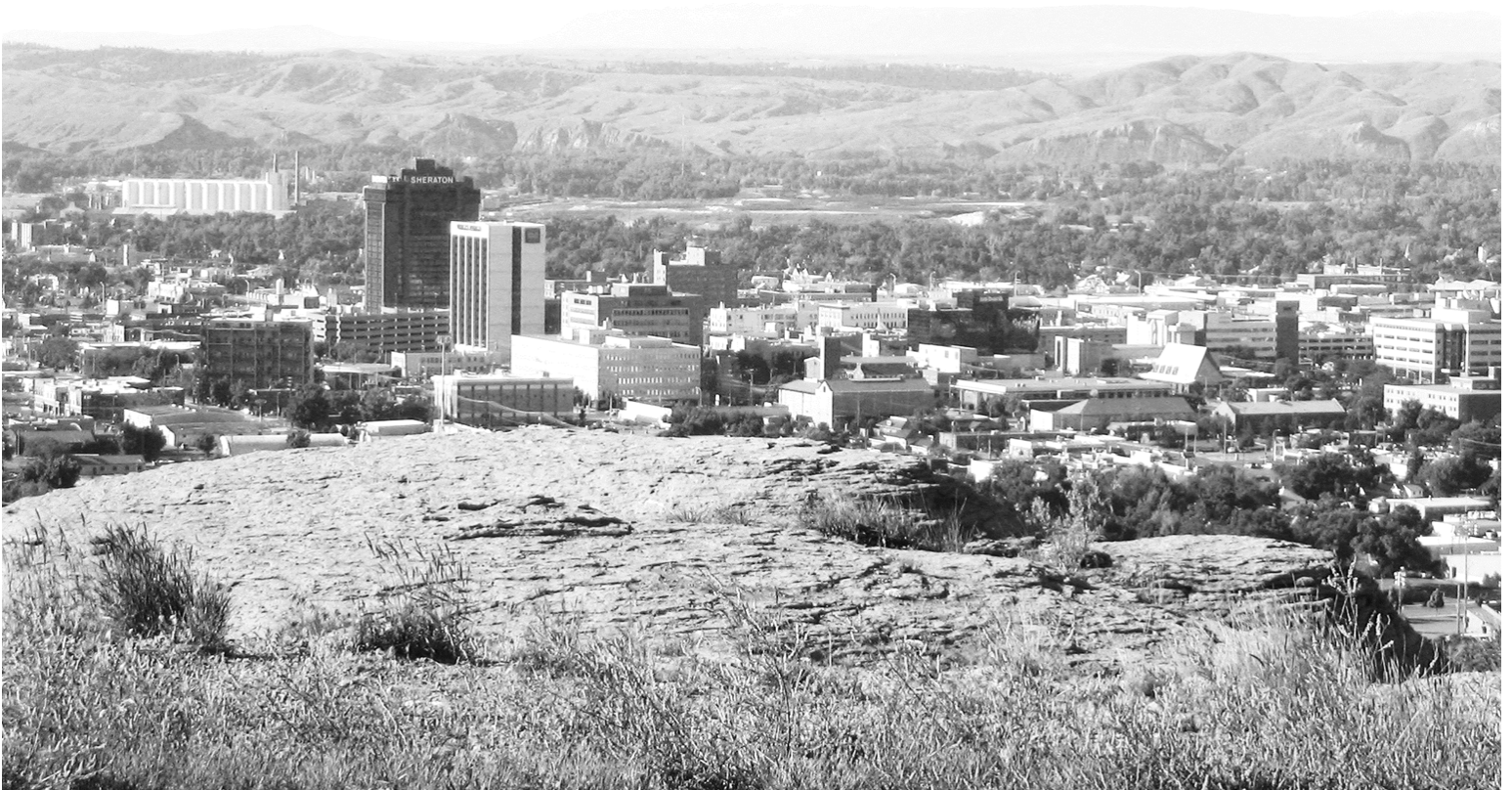




# Comprehensive Annual Performance Evaluation Report FY2021 - 2022

**DRAFT**

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|--|---|
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| PR05: Drawdown Report by Project and Activity    | PR26: Activity Summary by Selected Grant  |
| PR07: Drawdown Report by Voucher Number          | PR27: Status of HOME Grants - Entitlement |
| PR09: Receipt Fund Type Detail Report HOME       | PR33: Home Matching Liability Report      |
| PR22: Status of HOME Activities - Entitlement    | PR56: CDBG Timeliness Report              |
| PR23: CDBG / HOME Summary of Accomplishments     |   |
| PR25: Status of CHDO Funds by Fiscal Year Report |   |

*\*All table references are those included and required in HUD's IDIS eCon Planning Suite system.*

## CR-05 Goals and Outcomes

### Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview including major initiatives/highlights that were proposed and executed throughout the program year. Maximum 4,000 characters and no additional text boxes available.

#### Introduction

Presented herein is the City of Billings FY2021-2022 Comprehensive Annual Performance and Evaluation Report (CAPER) for the federally funded Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). CDBG and HOME funds were granted to the City as an entitlement community through the United States Department of Housing and Urban Development (HUD).

The CAPER covers a program year beginning on July 1 to June 30 and it illustrates the City's progress in meeting goals in the five-year Consolidated and Annual Action Plans. Funding is allocated on a shovel- / close-ready basis to ensure efficient use of funds.

The public comment period for this CAPER exceeded the 15-day minimum; August 26 through September 12, 2022. The City Council will hold a public hearing to obtain public comment on:

- CDBG and HOME achievements in the CAPER;
- Current community needs to assist the Community Development Board in:
  - Designing the application process for the upcoming program year, before the publication of the drafted Annual Action Plan; and
  - Identifying the needs of those experiencing homelessness in preparation for HOME-ARP assessment and activities.

Federal regulations require the City to facilitate two public hearings, at different stages of the program year, to obtain residents' views and respond to questions. Public comments are included in the appendix.

**Major Initiatives and Highlights:** The COVID-19 pandemic had a significant impact on low-income individuals and families, contractor availability, project feasibility, and housing prices. The number of positive COVID cases rose beginning in July 2021 and peaked in January 2022; the highest number of daily cases in history. The chart below represents the number of positive cases identified per day.

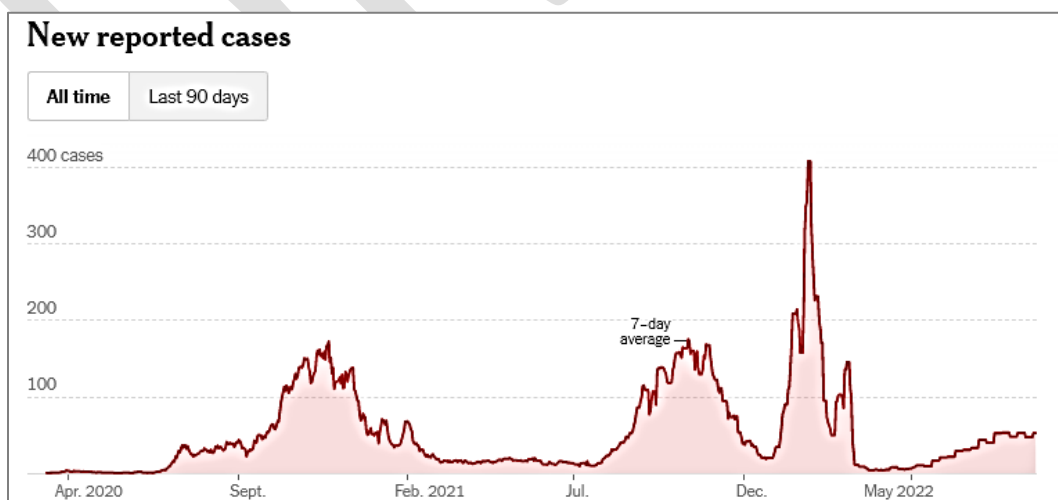


Figure One – Number of Positive COVID Cases per Day - Yellowstone County, Montana Covid Case and Risk Tracker  
*Retrieved from the New York Times on August 22, 2022*

The CDBG-CV allocation and revenue from CDBG and HOME loan repayments allowed the City to respond quickly with additional allocations to help prepare, prevent, and respond to the coronavirus. The City posted three separate opportunities to access federal resources. Several public facility and public service projects and activities were funded to address pandemic needs.

- **The Salvation Army:** Increase food service by 20 percent through the mobile meals program.
- **Downtown Billings Improvement District:** Installation of a public handwashing and restroom facility in an area frequently used by those experiencing homelessness.
- **Parks Improvements:** Low-income neighborhood parks will be improved with touchless restroom fixtures; facilities to provide suitable outdoor fitness and creating spaces to support social distancing; ADA upgrades; playground equipment; community building airflow exchange; and the installation of adult exercise equipment to encourage physical activity and social distancing outside.
- **Fast-Track Public Services:** The City implemented a fast-track public services application process in December 2021 and several awards were made to social service agencies to address pandemic needs. Awards can be found online [www.BillingsMT.gov/CDBGcvfast](http://www.BillingsMT.gov/CDBGcvfast).
- **Alternatives, Inc.:** \$47,000 in CDBG funding will be used to strengthen information technology and app development to provide mental health treatment options, at a distance, to low-income clients.
- **Boys & Girls Club:** \$140,000 in CDBG funding will be used to renovate an insufficient front reception area at the Boys & Girls Club in order to provide room for social distancing.
- **Billings Public Schools:** \$313,300 in CDBG and CDBG-CV funding will be used to replace an insufficient HVAC system at Washington Elementary School to improve indoor air quality and ventilation. The Delta variant significantly impacted children attending school in Billings and accelerated the spread of the coronavirus across the city.

The following tables compare proposed and actual outcomes for the FY2020-2024 Consolidated Plan (*Expected / Actual Strategic Plan*) and the FY2021-2022 Annual Action Plan (*Expected / Actual Program Year*).

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives.** 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

*HUD IDIS Tables 1 and 2 - Accomplishments –Strategic Plan to Date and Program Year*

Goal	Category	Source / Amount*	Indicator	Unit of Measure	Five-Year Goals: FY2020-2024			One-Year Goals: FY2021-2022		
					Expected Strategic Plan	Actual Strategic Plan	% Complete	Expected Program Year	Actual Program Year	% Complete
Create, preserve, and expand affordable housing options	Affordable Housing	CDBG \$1,886,534	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	60	60	100%	-	-	-
			Rental units constructed	Household Housing Unit	10	-	-	-	-	-
		Rental units rehab	-		-	-	-	-	-	
		Homeowner Housing Added	-		-	-	-	-	-	
		Homeowner Housing Rehabilitated	20		Did not meet goal - pandemic impact		2	Did not meet goal - pandemic impact		
		Direct Financial Assistance to Homebuyers	Households Assisted	175	88	50%	35	27	77%	
Neighborhood Revitalization: Foreclosures	Affordable Housing	CDBG \$780,677	Homeowner Housing Rehabilitated	Household Housing Unit	5	1	20%	1	0	100%
			Buildings Demolished	Buildings	0	1	-	-	0	N/A
Poverty Impact	Poverty Impact	CDBG \$585,508	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,000	1338	134%	200	448	224%
Prevent, prepare for, and respond to coronavirus	Other: Prevent, prepare for, and respond to coronavirus	CDBG-CV \$909,126	Public service activity for low-income benefit	Persons Assisted	500	1977	395%	500	1977	395%
			Public facility or infrastructure activities		500	0	-	100	Accomplishments will be reported in FY22-23 CAPER, projects underway	

*Staff Note: HUD’s Integrated Disbursement and Information System (IDIS) screen separates HUD Table 1 - Accomplishments - Program Year and HUD Table 2 - Accomplishments - Strategic Plan to Date.*

*\*Monetary figures in this chart represent the estimated investment of CDBG and HOME funds noted in the Consolidated Plan for a five-year period.*

**Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

---

The City of Billings utilizes CDBG funds to address low-income housing needs through home repair, home buyer, and affordable housing development programs. The City also supports a public service activities to assist nonprofit organizations in meeting the needs of those impacted by the coronavirus, and those experiencing homelessness and / or poverty. The following priorities have been identified as specific and are included in the Consolidated Plan.

**Create, preserve, and expand affordable housing options:** The use of CDBG funds for housing positively influences housing accessibility and affordability for current low-income home owners and potential homebuyers. The majority of homeowners are cost burdened; paying greater than 30% of household income for housing expenses.

- **Housing Rehabilitation:** The City was unable to assist low-income households with financing to carry out major home repairs. Significant hail storms the summer of 2019 contributed to a contractor and workforce shortage. Homeowners have been hesitant to engage with the program due to coronavirus contamination concerns. Skyrocketing building supply costs and lack of inventory have also contributed to the program's decline. The program has been discontinued beginning in FY2022-2023.
- **Affordable Housing Development:** CDBG funding totaling \$540,000 was provided to NeighborWorks Montana, a certified Community Housing Development Organization (CHDO), to upgrade infrastructure for a resident-owned-community benefitting 60 low-income households residing in manufactured housing. The project is nearly complete and asphalt was installed in the fall of 2021. Several additional items will be completed on the project during 2022. Achievements for this activity were reported in the FY2021-2022 CAPER.
- **First Time Home Buyer:** Twenty-one families were able to purchase their first home this fiscal year through financing for down payment and closing costs. Ten of the households were assisted with CDBG and 17 were assisted with HOME funding.

This is a tremendous achievement given current local economic conditions. Billings was ranked number one in the Wall Street Journal / Realtor.com's [July 2021 Emerging Housing Markets Index](#), noting increased opportunity for remote work. The [housing price index](#) for the first quarter in 2020 was \$261,100; in 2021 it increased to 279,910; and in 2022 it rose again to \$342,710. There are very few homes on the market, particularly those appraising under HUD's purchase price limits.

**Neighborhood Revitalization: Foreclosures:** Using CDBG funds to create low-income housing opportunities improves access to, and the quality of, the affordable housing stock. Low-income households need access to affordable housing and there are a limited number of housing units available, as indicated in the Consolidated Plan's Market Analysis. In addition, the Consolidated Plan's Needs Assessment indicates the majority of homeowners and renters are cost burdened; paying greater than 30% of household income for housing expenses. The number of people in need is rising, including the homeless, the elderly, and the disabled.

- **Foreclosure Acquisition / Rehabilitation:** The City purchased, rehabilitated and sold twelve homes to income-qualified households since 2009. One property was purchased in the Billings Heights area (Steffanich Drive) and staff reviewed the project for rehabilitation feasibility. The property was not feasible for rehabilitation and subsequently demolished. City staff has facilitated

several Request for Proposals / Invitation for Bids processes without receiving responses:

- **Request for Proposals – Affordable Housing Development Project** (advertising): November 29 & December 6, 2019; January 17 & 31, 2020; and March 6 & 20, 2020.
- **Request for Proposals – Affordable Modular Housing Project** (advertising): December 17 & 24, 2021.
- **Invitation for Bids – Modular Home** (advertising): July 8, 15 & 29, 2022.

Staff is presently visiting with all of the modular home companies in the Billings area to discuss direct bids for the project. Staff is also seeking a 3D home printing bid using the same project specifications for this reconstruction project.

**Poverty Impact:** Nonprofit social service organizations greatly benefit from the use of CDBG funds to support the Billings Metro VISTA Project. VISTA members work to alleviate poverty through the expansion or improvement of services such as housing, healthcare, education, employment, and financial literacy to alleviate poverty conditions for very low-income citizens.

- **Billings Metro VISTA Project:** AmeriCorps Volunteers in Service to America (VISTA) members were dedicated to impacting poverty and homelessness in Billings. Overall, the project provided education, housing, health and social services to 448 extremely low-income and low-income individuals in the Billings area this year.

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**CR-10 Racial and Ethnic Composition of Families Assisted**

**Describe the families assisted (including the ext and ethnic status of families assisted).** 91.520(a)

Race / Ethnicity	CDBG	HOME	Totals
White	1648	16	1700 / 62%
Black or African American	59		1023 / 38%
Asian	20		
American Indian or American Native	816		
Native Hawaiian or Other Pacific Islander	5		
American Indian and Black*	6	1	
Multi-Racial*	116		
<b>Totals*</b>	<b>2706</b>	<b>17</b>	<b>2723</b>
Hispanic	173	1	174 / 6%
Not Hispanic	2533	16	2549 / 94%

HUD IDIS Table 3 - Assistance to racial and ethnic populations by source of funds.

**Narrative**

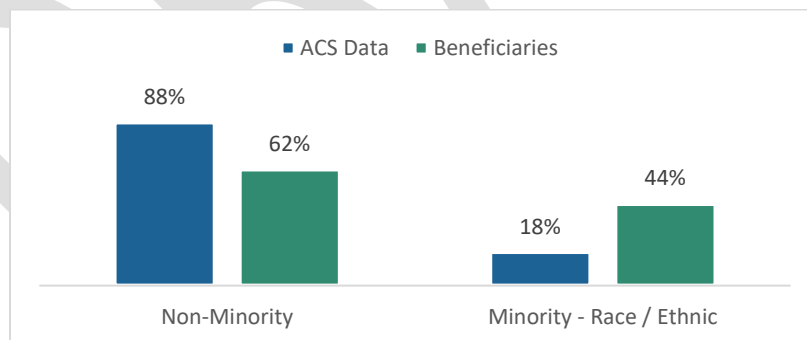
The City assisted 2,723 beneficiaries with CDBG and HOME this fiscal year. Thirty-eight percent of the beneficiaries self-reported they were a racial minority. Six percent reported they were Hispanic.

Special Categories		CDBG	HOME	Totals All Programs
Single Head of Household	Female	616	5	1303 / 48%
	Male	681	1	
Disabled		458	0	458 / 17%
Elderly		196	0	196 / 7%

City of Billings - Table A - Special category beneficiaries by funding source.

Out of the total beneficiaries assisted, 48 percent noted they were single-headed households, 17 percent self-reported disabilities, and 7 percent of the beneficiaries noted they were elderly.

*\*Please note: The above charts were adapted from HUD’s IDIS system as IDIS does not include a category for American Indian and Black or Multi-Racial beneficiaries, which impacts table totals and percentages.*



City of Billings - Figure 1 - Billings ACS data compared to beneficiary demographics.

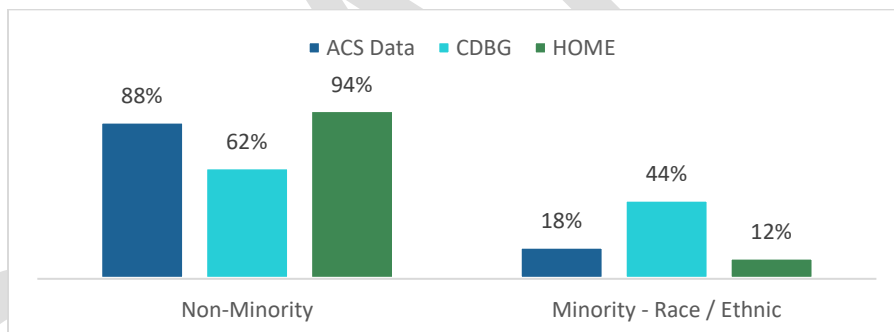
The 2021 American Community Survey (ACS) estimates indicate a 18 percent overall percent minority rate in Billings, including Hispanics. Forty-four percent of the City’s beneficiaries were racial and ethnic minorities this past fiscal year when calculated using category percentages collectively.

*Please note: ACS data estimates are derived from sample data and sampling / non-sampling errors are likely. The small size of the City’s population (117,445) creates variability in data accuracy, particularly for cohorts less than 10 percent of the total population and the margin of error can be 10 percent. Further, programs serving less than 30 households are not considered statistically valid, like the First Time Home Buyer program.*

Beneficiaries by Program and Funding Source						
Race / Ethnicity	Home Buyer		VISTA	Public Services	Totals	
	CDBG	HOME	CDBG	CDBG-CV		
White	8	16	278	1398	1700	
Black or African American			13	46	59	
Asian			5	15	20	
American Indian or American Native	2		133	681	816	
Native Hawaiian or Other Pacific Islander				5	5	
American Indian and Black		1		6	7	
Multi-Racial			19	97	116	
Subtotals	10	17				
<b>Totals</b>		<b>27</b>	<b>448</b>	<b>2248</b>	<b>2723</b>	
Hispanic	1	1	42	130	174	
Not Hispanic	9	16	406	2118	2549	
Special Populations		Home Buyer		VISTA	Public Services	Totals
		CDBG	HOME	CDBG	CDBG	
Single Head of Household	Female	1	5	119	496	621
	Male		1	90	591	682
Disabled Households				72	386	458
Elderly				24	172	196

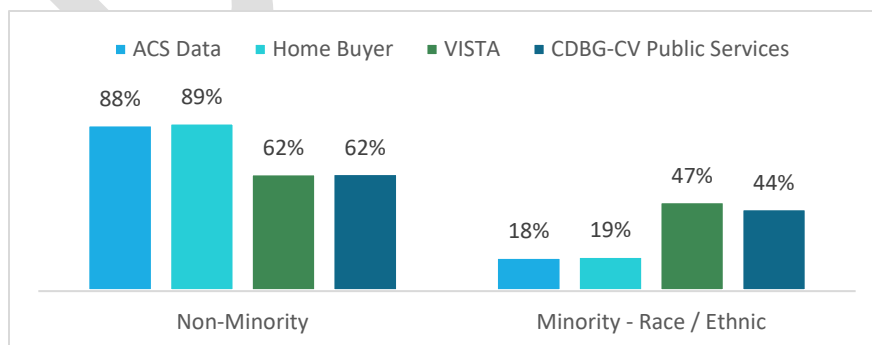
City of Billings - Table B - Beneficiaries by City program and funding source.

**Demographics by Funding Source:** The 2021 ACS data indicates an approximate 18 percent minority rate, including both racial and ethnic categories. Over 40 percent of CDBG beneficiaries are minorities. HOME data is not considered statistically valid due to the low cohort size (17 households).



City of Billings - Figure 2 - Billings ACS data compared to beneficiaries by funding source.

**Demographics by Program:** Nineteen percent of the First Time Home Buyer beneficiaries, forty-seven percent of the Billings Metro VISTA Project beneficiaries, and 44 percent of the CDBG-CV Public Service beneficiaries were racial / ethnic minorities.



City of Billings - Figure 3 - Billings ACS data compared to beneficiaries by City program.

Please note: The PDF version of the CAPER submitted to HUD via email and through IDIS contains various charts and graphs depicting data explained herein. Charts and graphs may not be included in the IDIS version, as they are not sizing correctly when uploaded.

**Ongoing Marketing:** Community Development Division staff makes concerted efforts to market available programs and opportunities to attract minorities, the disabled, and female-headed households to participate. The **Montana Relay 711** phone number is placed on City correspondence, publications, notices, and on program brochures. Information on home repair and purchase programs has been continually available via the City of Billings website, at the Community Development office, the City’s Building Division and the Billings Home Center.

**Community Outreach:** When possible, staff has participated in community events to promote home buyer / repair programs and contractor opportunity, including the *Phillips 66 Meet in the Park* event held each September in South Park, a lower income neighborhood. The South Side Neighborhood has high concentrations of low-income, racial / ethnic minorities, and female-headed households. City staff has historically contacted mobile home park managers to distribute brochures on home buyer / repair programs and contractor opportunity. In the past, staff also provided a contractor’s ad to local title companies who manage rehabilitation accounts for various construction agencies. Contractor recruitment cards have also been made available through the City’s Building Division.

Each spring, staff offers to present information on the Consolidated Plan, Annual Action Plans, housing programs, contractor opportunity, and to garner feedback on federal funding allocations to Neighborhood Task Forces representing low-income communities. In prior years, home buyer / repair brochures, contractor opportunity, and marketing materials have been provided to the Office of Indian Education for distribution during their Native Family Nights. Materials have also been provided to the Indian Health Board. CDBG-CV grant opportunities were marketed through direct emails to all local area nonprofit organizations, website posts, and mentioned during multiple public meetings.

**Advertising:** Print advertisement for home buyer / repair programs and contractor ads have appeared in multiple publications including the Tidbits of Billings, Generation Link, the CityLink, and the Senior News. Online banner ads have been placed in the Billings Gazette to be displayed on their website. Several years ago, a full-color insert was enclosed in more than 35,000 utility bills and direct mailed to City residents.

**Marketing and Outreach Results:** The City received 67 applications for the First Time Home Buyer program (see chart below). Sixteen percent of the applicant households self-identified as racial or ethnic minorities, collectively. Application denials are typically due to Area Median Income limits for both home buyer and repair programs. The City also received 16 applications for CDBG-CV public service or facility grants this fiscal year for coronavirus prevention, preparation, and response activities.

Applicants by City Program		
Race / Ethnicity		Home Buyer
White		59
Black or African American		1
Asian		0
American Indian or American Native		6
Native Hawaiian or Other Pacific Islander		0
American Indian and Black		0
Multi-Racial		1
<b>Totals</b>		<b>67</b>
Hispanic		3
Not Hispanic		64
Special Populations		Home Buyer
Single Head of Household	Female	18
	Male	3
Disabled Households		3
Elderly		2

City of Billings - Table C - Demographics of applicants by City program

## Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	HUD	\$1,150,835	\$820,592
HOME	HUD	\$831,459	\$346,274
CDBG-CV	HUD	\$909,126	\$235,028
HOME-ARP	HUD	\$1,211,321	\$0

HUD IDIS Table 4 - Resources made available and expended, including new entitlement and fiscal year repayments.

## Narrative

## Resources Made Available

- **CDBG:** New CDBG entitlement funds totaled \$654,649 and program income received during the fiscal year totaled \$496,186. The City of Billings had a total of \$1,150,835 in CDBG funds available this fiscal year. Funding was allocated to support coronavirus response, preparation, and prevention activities including parks improvements, public services, upgrades at a local elementary school, the Boys & Girls Club, etc.
- **HOME:** New HOME entitlement funds totaled \$334,548 and recaptured funding and other HOME revenues totaled \$496,911 (\$348,000 in recaptured funds and \$68,911 in program income). The City of Billings had a total of \$831,459 available in HOME funds this fiscal year.
- **CDBG-CV:** HUD allocated \$909,126 and this funding has been fully committed to coronavirus response, preparation, and prevention projects and activities. Please reference the CDBG explanation of projects / activities above.
- **HOME-ARP:** The City was awarded \$1,211,321 and 15 percent will be used for administration for the life of the grant (up to 23 years). City staff is currently developing the tools necessary to carry out a required needs assessment prior to designing an application / allocation process for data-driven priority activities. All funds must be expended by the year 2030 and projects must be monitored for 15 years.

## Amount Expended During Program Year

- **CDBG:** Expenditures in entitlement and program income funds totaled \$820,592 this fiscal year. This included funding allocated in previous fiscal years that was expended this year. This year's timeliness ratio was **1.67** as measured on May 2, 2022; above the maximum 1.5 ratio. If the City cannot meet the timeliness goal in FY2022-2023, a workout plan will need to be submitted to HUD.
- **HOME:** Expenditures in entitlement and program income funds totaled \$346,274 this fiscal year. This included funding allocated in previous fiscal years that was expended this year.
- **CDBG-CV:** Expenditures total \$235,028 for coronavirus prevention, preparation and response activities; 26 percent of total funding. The City must expend 80 percent of CDBG-CV funding by July 2024 and 100 percent of all funding by July 2027.

As required by HUD, City staff ensures the use of currently available program income prior to drawing down entitlement funds in the CDBG program.

**Identify the geographic distribution and location of investments**

<b>Target Area</b>	<b>Planned Percentage of Allocation</b>	<b>Actual Percentage of Allocation</b>	<b>Narrative Description</b>
Citywide	100%	100%	City of Billings Limits

*HUD IDIS Table 5 – Geographic distribution and location of investments.*

**Narrative**

As per findings and recommendations from the City’s Analysis of Impediments to Fair Housing Choice, the investment of federal funds is not distributed to a specific geographical location in Billings. The City of Billings utilizes federal funding on a citywide basis, targeting qualified low-income households for investment and programs.

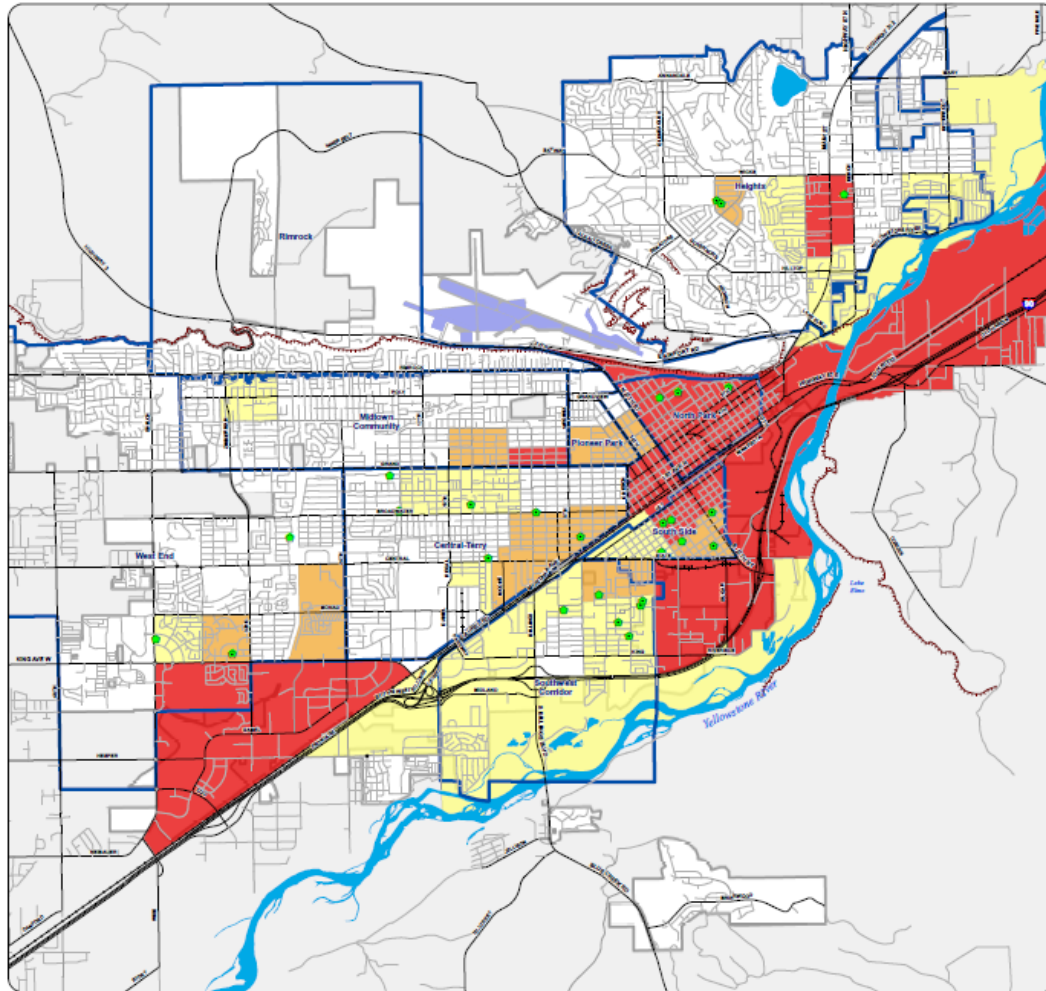
Priorities for funding are based on both the most recent Needs Assessment in the Consolidated Plan and the 2013 Analysis of Impediments to Fair Housing Choice. Citation 24 CFR 91.220(f) reads as follows, “When appropriate, jurisdictions should estimate the percentage of funds they plan to dedicate to target areas.” Estimating the percentage of funds planned for dedication to target areas is not appropriate for the Billings community due to the following reasons:

- Geographic area is defined by the current City of Billings limits.
- Strategies encourage the distribution of resources citywide to support affirmatively furthering fair housing, equal opportunity, and the avoidance of segregation in Billings.
- The description for geographic distribution includes the focus of resources on a citywide basis to support diversity across the community.
- The City of Billings is classified as a smaller city on a national scale.
- The preliminary dollar amount dedicated to each program is included in the Annual Action Plan.

The City has focused distribution of investments on a citywide basis in order to support diversity and mixed-income development across the community. The City’s performance in serving predominantly low-income households is clear via Integrated Distribution Information System (IDIS) reporting; nearly 100%.

Neighborhood Revitalization Strategy areas have not been established in Billings and there is no specific amount of funding allocated for a target area in the City’s geographic distribution of resources. Therefore, the City has dedicated zero percent of funding to target areas in favor of supporting a citywide approach to further fair housing, equal opportunity and anti-segregation efforts.

The map below clearly illustrates the disbursement of federal investments to promote equal opportunity in all neighborhoods for the City’s home buyer, repair and foreclosure programs for this fiscal year. [An infrastructure project is underway in the Southwest Corridor. The C & C Community is a resident-owned, manufactured housing community.](#)



# City of Billings

Neighborhood Task Force Areas  
&  
Low and Moderate Income  
2015 Census Data



Low to Moderate Income Estimates have been prepared at the Census Bureau's Geographic Summary Level "500" State-County-County Subdivision-Place/Remainder-Census Tract/Unincorporated Block Group for FY16

**Legend (FY 21-22)**

- CDBG - Home Buyer
- HOME - Home Buyer
- Railroad
- Rims
- Task Force Area
- Yellowstone County

**Pct Low - Mod Income**

- 50 - 60 %
- 61 - 70 %
- 71 - 95 %



City of Billings - Figure 4 - Geographic distribution of CDBG and HOME investments.

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Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

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**Publicly-Owned Land:**

The requirements set forth in CFR 24 91.220 and 91.520 are as follows:

- Where the jurisdiction deems it appropriate, the jurisdiction may indicate publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.
- The performance report must include a description of the resources made available, the investment of available resources, the geographic distribution and location of investments, the families and persons assisted (including the racial and ethnic status of persons assisted), actions taken to affirmatively further fair housing, and other actions indicated in the strategic plan and the action plan.

The City of Billings does not have plans to use publicly owned land to address needs identified in the Consolidated Plan. However, the Billings City Council supported the Community Development Division's housing programs by dedicating \$250,000 in non-federal funds in 2013. The City Council dedicated an additional \$195,321 in non-federal funding to further the City's housing programs. The City's generous and dedicated financial support should be recognized, even if the City does not use publicly owned land to support the Consolidated Plan.

**Overall Leveraging:** The City continually makes strides in obtaining other public and private resources to address identified needs. The total leveraging for CDBG and HOME this fiscal year is \$5,508,013 which calculates to a leveraging ratio of 1:6. Included in this figure are the following notable leveraging resources:

- **Montana Board of Housing (MBOH) and Lender Financing:** \$4,800,063 in loans secured in conjunction with its First Time Home Buyer and Foreclosure programs. Several lenders also offer below-market, fixed interest rates for low-income homebuyers.
- **CDBG-CV Awardees:** Public service awardees matched the CDBG-CV awards with \$119,453 to carry out activities to prevent, prepare for, and respond to the coronavirus pandemic.
- **AmeriCorps VISTA:** This fiscal year, VISTA members generated \$117,208 in cash and in-kind contributions. The Corporation for National and Community Services' grant to the City totaled \$466,289. Host Sites also contributed \$5,000 to support the program.

Since 2005, City staff has generated an additional \$8,215,678 in cash and grant awards (outside of CDBG and HOME) to further goals developed in the City's Consolidated Plans. This includes significant funds to further fair housing education through the Fair Housing Initiative Programs.

**HOME Leveraging:** The HOME program requires 25 percent match funding for projects be dedicated from non-federal sources. The City of Billings meets HOME matching requirements through low-interest financing available for First Time Home Buyer loans issued through private lenders and the MBOH and matching funds provided for other affordable housing projects undertaken with HOME funds, such as private contributions.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	\$6,509,175
2. Match contributed during current Federal fiscal year	\$0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$6,509,175
4. Match liability for current Federal fiscal year	\$0 - waived due to pandemic
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$6,509,175

HUD IDIS Table 6 - Funding leveraged to support the HOME program.

<b>Match Contribution for the Federal Fiscal Year</b>								
<i>October 1, 2020 through September 30, 2021</i>								
Project No. or Other ID	Date of Contribution	Non-Federal Cash	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated Labor	Bond Financing	Total Match
Waived due to pandemic								
<b>Total</b>								

HUD IDIS Table 7 - Match contribution for the most recently completed federal fiscal year.

<b>HOME Program Income</b>				
<i>Enter the program amounts for the reporting period</i>				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	TBRA Amount	Balance on hand at end of reporting period
\$0	\$99,554	\$99,554	\$0	\$0

HUD IDIS Table 8 - Program income entered into IDIS via the IDIS PR-09 Report during the fiscal year; does not include recaptured revenue received from loan repayments.

As noted on the PR-09 IDIS report: a total of \$99,554 was entered into IDIS prior to the fiscal year end; and the balance on hand at the end of the reporting period totals \$0. The City utilized HOME funding for homebuyer assistance activities and no HOME contracts. There were no rental property owners assisted and displacement did not occur. *Add IDIS Textbox*

<b>Minority Business Enterprises and Women Business Enterprises</b>						
<i>Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</i>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts	0	0	0	0	0	1
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
Subcontracts	0	0	0	0	0	0
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts	0	0	0			
Number	0	0	0			
Dollar Amount	0	0	0			
Subcontracts	0	0	0			
Number	0	0	0			
Dollar Amount	0	0	0			

HUD IDIS Table 9 - Minority- and women-owned business enterprises engaged during the program year.

<b>Minority Owners of Rental Property</b>						
<i>Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted</i>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

HUD IDIS Table 10 - Minority owners of rental property assisted during the program year.

<b>Relocation and Real Property Acquisition</b>						
<i>Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition</i>						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

HUD IDIS Table 1 Number of individuals displaced during the program year.

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Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate income, and middle income persons served.

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	0	0
Number of non-homeless households to be provided affordable housing units	38	27
Number of special-needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>38</b>	<b>27</b>

HUD IDIS Table 2 - Number of homeless, non-homeless, and special-needs households assisted.

	One-Year Goal	Actual
Number of households supported through rental assistance	0	0
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	3	0
Number of households supported through the acquisition of existing units	1	0
<b>Total</b>	<b>4</b>	<b>0</b>

HUD IDIS Table 33 - Number of households receiving assistance through housing development.

### Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The 27 units represented in the non-homeless households provided with affordable housing includes:

- 10 CDBG First Time Home Buyer beneficiaries, IDIS activity 1699; and
- 17 HOME beneficiaries, various IDIS activities from 1694 through 1750.

Unfortunately, the City was unable to meet the one-year goals established for rehabilitating existing units through the Housing Rehabilitation program and was unsuccessful in assisting households through the Foreclosure Acquisition / Rehabilitation programs. Other housing efforts for activities open during the fiscal year can be reviewed in the PR-03 CDBG Activity Summary Report.

#### Affordable Housing Development Program

- **Activity 1669** represents the C & C Community's infrastructure project to assist 60 low-income households in a resident-owned-community. The project involves street improvements for a manufactured housing development. Achievements and beneficiaries are included in the FY2020-2021 CAPER ([www.BillingsMT.gov/CAPER](http://www.BillingsMT.gov/CAPER)).

#### Housing Rehabilitation Program

- **Activity 1666** funded Housing Rehabilitation program administration. Despite valiant efforts, staff has been unable to close rehabilitation loans with low-income households due to pandemic impacts. As a result, the program has been closed beginning in FY2022-2023.

## Foreclosure Acquisition / Rehabilitation Program

- **Activity 1631** represents demolition work competed on a foreclosed property on Steffanich Drive. A feasibility assessment for rehabilitation or demolition was completed. The property was not feasible for rehabilitation and subsequently demolished. City staff has facilitated several Request for Proposals / Invitation for Bids processes without receiving bids or proposals:
  - **Request for Proposals – Affordable Housing Development Project** (advertising): November 29 & December 6, 2019; January 17 & 31, 2020; and March 6 & 20, 2020.
  - **Request for Proposals – Affordable Modular Housing Project** (advertising): December 17 & 24, 2021.
  - **Invitation for Bids – Modular Home** (advertising): July 8, 15 & 29, 2022.

Staff is presently visiting with all of the modular home companies in the Billings area to discuss direct bids for the project. Staff is also seeking a 3D home printing bid using the same project specifications for this reconstruction project.

- **Activity 1664** is the rehabilitation of a foreclosed property located at 817 North 22<sup>nd</sup> Street. This foreclosed property was purchased, rehabilitated, and sold to a low-income household. Beneficiary demographic data is recorded in this activity in a prior year’s CAPER.
- **Activity 1667** was opened as a Foreclosure Acquisition / Rehabilitation project. However, no foreclosed homes have been available in the Billings area due to the pandemic.

### Discuss how these outcomes will impact future annual action plans.

The City of Billings is utilizing CDBG and HOME funds to support home buyer, foreclosure and development programs. Outcomes are based on program demand and available federal and non-federal funding resources to carry out planned activities. City staff will continue to set achievable annual action plan goals and will adjust the Consolidated Plan as needed to reflect changes in available federal and non-federal funding and program demand.

Include the number of extremely low-income, low-income, and moderate income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	0	1
Low-income	10	16
Moderate income	0	0
<b>Total</b>	<b>10</b>	<b>17</b>

Table 4 - Number of households assisted through the City’s housing programs.

### Narrative Information

All of the City’s beneficiaries served this fiscal year had household incomes less than 80 percent of the Area Median Income (AMI) level. In the CDBG program, *low and moderate income* refers to households under 80 percent of the AMI, which is the same threshold in determining factor in the HOME program’s *low-income* determination. All of the City’s affordable housing beneficiaries were homeowners or were assisted in achieving homeownership. Therefore, the City did not offer rental assistance during this fiscal year.

CDBG actual data illustrated in Table 13 includes homebuyer, foreclosure, and Affordable Housing Development projects. The HOME actual category includes homebuyer and HOME housing development activities. Actions taken to foster and maintain affordable housing include the following:

- **Extremely Low-income:**
  - **HOME:** One extremely low-income household was assisted through the First Time Home Buyer program.
- **Low-income:**
  - **CDBG:** Ten households were assisted through the First Time Home Buyer program.
  - **HOME:** Sixteen low-income households were assisted through the First Time Home Buyer program.

The City of Billings was not able to achieve its affordable housing goals and did not provide assistance to middle-income households. The pandemic impacted the City's ability to meet many goals. The City did not meet its goals to in the First Time Home Buyer program or rehabilitate housing units through home repair / foreclosure programs primarily due to the pandemic.

Efforts to address *worst case needs* refers to low-income renter households who pay more than half of their income for rent, live in seriously substandard housing, including the homeless, or who have been involuntarily displaced. This fiscal year, the City did not create any goals to assist rental households with rental assistance. However, the City may have assisted rental households in acquiring a home through the homebuyer programs. This fiscal year, zero households assisted through Community Development Division's housing programs self-reported that they were disabled.

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Evaluate progress in meeting its specific objectives for reducing and ending homelessness through:

**Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.**

The City does not directly receive Continuum of Care, Emergency Shelter Grant, or other federal funds to exclusively support efforts to impact homelessness. CDBG resources have decreased dramatically, which greatly inhibits the City's ability to support overall administrative activities to coordinate services to benefit the homeless, particularly when the City does not directly receive mainstream federal funding sources to impact homelessness. Therefore, the City's progress in reaching out to homeless persons, particularly unsheltered persons, is greatly limited.

**Current Efforts:** In October and November 2020, the local Continuum of Care opened a 40-unit low-barrier shelter with quarantine / isolation capacity. In September 2021, the owner of the property, HAB Development, submitted an Affordable Housing Development program application for boiler repairs, rehabilitation, and the installation of new heating / cooling systems. The project will be reviewed by the Billings City Council on October 25, 2021.

**Historical Efforts:** In 2006, City staff began the process of writing a ten-year plan to impact homelessness. Local housing, health, and social service organizations have been intricately involved in planning processes for the homeless and chronically homeless. The Billings City Council created the Mayor's Committee on Homelessness, which is comprised of twenty individuals representing nonprofit organizations, lending, housing, philanthropy, social service providers, code and law enforcement, economic development, work force agencies, veterans, civic and business leaders, philanthropic organizations, academia, health care, American Indian stakeholders, and those experiencing homelessness. In 2009, the City's ten-year plan to impact homelessness, *Welcome Home Billings*, was adopted by the Billings City Council.

To the greatest extent possible, City staff has continued to implement Welcome Home Billings with support provided through the Billings Metro VISTA Project. VISTA members have been placed at over 50 nonprofit Host Site organizations to work on specific anti-poverty initiatives to assist people in accessing housing, healthcare, education and employment.

The Community Development Division staff has implemented the following:

- Development and distribution of the City's *Resource Map* and *Notepad*, which includes a comprehensive downtown service directory for anyone seeking assistance. These resources are also available at the City office and are also online:
  - [www.CityofBillings.net/resourcemap](http://www.CityofBillings.net/resourcemap)
  - [www.CityofBillings.net/notepad](http://www.CityofBillings.net/notepad)
- Placement of full-year and ten-week summer associate VISTA members at local nonprofit organizations primarily serving the homeless and those at risk of homelessness through the *Billings Metro VISTA Project*.

The Mental Health Center manages the Projects for Assistance in Transition from Homelessness (PATH) outreach program to engage those living outside or in areas unfit for human habitation. Tumbleweed runs a Street Outreach program to seek out unaccompanied youth to engage them in services. A complete listing of services, including outreach, is included in the MA-30 Homeless Facilities and Services section of this Consolidated Plan.

## Addressing the emergency shelter and transitional housing needs of homeless persons.

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The City of Billings is addressing homelessness to the greatest extent possible, although the City does not directly receive Emergency Solutions Grants, McKinney Vento Homeless Assistance Act grants, or other federal funding to specifically address the housing needs of the homeless. Temporary housing needs for the homeless in Billings are primarily met by the Montana Rescue Mission Shelter, the Community Crisis Center, YWCA's Gateway House, Volunteers of America's Independence Hall, Family Promise of Yellowstone Valley, and Rimrock. A complete listing of services, including emergency and transitional housing, is included in the MA-30 Homeless Facilities and Services section of the Consolidated Plan.

City staff received an Affordable Housing Development program application from HAB Development for boiler repair, rehabilitation, and the installation of new heating / cooling systems for 40 units dedicated to serving those experiencing homelessness and individuals and families needing isolation and / or quarantine. This project was cancelled by HAB Development in April 2022 due to unforeseen circumstances.

Several local and state agencies assist homeless families by providing funding for rent, mortgage, utility, and deposits. The Community Crisis Center provides crisis intervention and 23-hour stays as a technique to impact chronic homelessness. The YWCA provides transitional housing for victims of domestic violence. The State of Montana has been providing six months of housing assistance for renters and homeowners if they have been impacted by the coronavirus.

Volunteers of America's Independence Hall is a 20-bed men's facility that has been providing transitional housing and services for honorably discharged veterans. While residing at Independence Hall, veterans are able to continue receiving treatment through the Department of Veterans Affairs and are given opportunities to participate in activities designed to help them reconnect with the community and get back to independent living.

City staff has provided over \$800,000 in HUD Economic Development Initiative and State financing to establish new housing for those experiencing homelessness in Billings:

- \$500,000 was awarded to Family Promise of Yellowstone Valley, formerly known as Interfaith Hospitality Network. Two duplex apartment properties were acquired and rehabilitated, resulting in a total of four rental units serving homeless families.
- \$300,000 was awarded to Rimrock, formerly Rimrock Foundation, to acquire and rehabilitate a single-family home to house up to six men who have experienced chronic homelessness.

For those living on the downtown streets of Billings, a new position has been created for an addiction / mental health counselor to accompany two downtown police officers when engaging people living on the streets. This initiative has been undertaken as one of the many outcomes from the Community Innovations Summit, which was facilitated by the Community Development Division, City Administration, and the Downtown Billings Alliance. [An article](#) published by the Billings Gazette highlights immediate successes as a result of this program. A complete list of service providers offering housing, services and prevention support is located in MA-30 Homeless Facilities and Services section of the Consolidated Plan.

With the HOME-ARP allocation, City staff will have the opportunity to conduct a needs assessment and respond to local homeless needs in FY2022-2023 and beyond.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

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The City does not receive or administer McKinney Vento Homeless Assistance Act or Emergency Solutions Grant funds to support programs to directly meet the needs of the homeless. The City did not receive requests this fiscal year for CDBG or HOME funding to assist the homeless. The HOME-ARP funding resource is the first direct allocation made directly to the City of Billings to assist those experiencing, or at-risk of, homelessness.

The Montana Continuum of Care (MT CoC) for the Homeless Coalition is primarily responsible for discharge policy and is the state's lead agency for addressing homeless activities through federal CoC funds, which includes the City of Billings. The MT CoC is a statewide collaboration of diverse homeless service providers, nonprofit organizations, local and state governments dedicated to preventing homelessness. The avoidance of discharging people living in federally funded programs to homelessness is a primary philosophy for Montana service providers.

CoC awards to organizations located in the City of Billings have historically been very low, as renewal grants are prioritized over pro-rata need and geographic distribution. Organizations in Billings have previously received five to seven percent of the over \$2.5 million awarded to the statewide Continuum of Care each year.

Additional local organizations providing prevention services include Family Service, Inc., the Food Bank, the Center for Children and Families, Harmony House, the Yellowstone AIDS Project, St. Vincent de Paul, and Tumbleweed, to name a few.

To the greatest extent possible, City staff has continued to implement *Welcome Home Billings*, the City's ten-year plan to impact homelessness. The City assists in the prevention of homelessness through the development and distribution of the City's *Resource Map* and *Notepad*, which includes a comprehensive downtown service directory for anyone seeking assistance. These resources have been distributed to health / mental health care facilities, foster care and other youth facilities, and local corrections programs. This initiative has been adopted by several community members and social service agencies and updates are underway. Montana 211 is also a resource to identify housing, healthcare, addiction, food, and other resources.

Through the Billings Metro VISTA Project, beneficiaries have received direct services relating to housing, food security, economic opportunity, education and employment support. Full-year and summer associate VISTA members have supported over 50 nonprofit organizations in the Billings area from 2007 to the present. For other accomplishments, please see the response to the first question in this section (CR-25).

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

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As previously stated, the City of Billings does not receive mainstream federal funding to reduce and end homelessness. To the greatest extent possible, City staff has continued to implement Welcome Home Billings, the City's ten-year plan to impact homelessness.

The City's *Resource Map* and *Notepad* includes a comprehensive downtown service directory for anyone seeking assistance. These resources have been distributed to health / mental health care facilities, foster care and other youth facilities, and local corrections programs. A local social services group has volunteered to update these documents and they have secured funding for printing and distribution. The Montana 211 website and phone line is now up and running, and this service provides another resource for Billings citizens.

The City sponsored a full-year VISTA member to assist NeighborWorks Montana in researching the feasibility of establishing a comprehensive housing center to serve low-income renters and homeowners. The VISTA member facilitated a working group comprised of the Billings affordable housing organizations to bring the Home Center into fruition. Participants included the City of Billings, HomeFront, Rebuilding Together Yellowstone County, District 7 HRDC, Rural Dynamics, Beartooth Resource Conservation and Development, and Homeward.

After 18 months of planning, the Home Center opened in July 2015 and it is located in downtown Billings, which is central to the City's low-income neighborhoods. The City provided a second, full-year VISTA member from July 2015 to July 2016 to help create the Home Center's housing programs. Today, the Home Center provides comprehensive housing services including information on available units, fair housing information, housing education and counseling. Housing services are coordinated under one roof, creating the opportunity for potential homebuyers and renters seeking safe, affordable homes and access all housing services in a one-stop-shop.

Additional information regarding crosscutting strategic and programmatic goals to impact homelessness is located in SP-40 Institutional Delivery Structure of the Consolidated Plan. For other accomplishments, please see the response to the first question in this section (CR-25).

**Actions taken to address the needs of public housing.**

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HomeFront, the City's local public housing authority, is eligible to apply for funding through the City's Affordable Housing Development Program. In the past, the City has granted over \$1.5 million to support efforts to expand affordable housing opportunities, resulting in 75 new housing units. The City has also provided funding for a variety of rehabilitation and new construction projects to neighborhoods that have public housing units.

The City has helped rehabilitate properties, sold land for new businesses, and granted land to nonprofits to assist with neighborhood revitalization efforts in neighborhoods where HomeFront complexes have been built. The City has also provided funding for parks and play areas for the neighborhoods where HomeFront families reside. The City's First Time Home Buyer program assists with home ownership down payment assistance and home ownership counseling for clients interested in purchasing their first home.

City staff coordinates with the HomeFront to assist with applications for supportive services when required. The City has also dedicated VISTA resources to support food security initiatives and a new reading literacy program. Several community gardens have been created on residential properties owned and managed by the HomeFront.

**Actions taken to encourage public housing residents to become more involved in management and participate in homeownership.**

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HomeFront implements the Family Self-Sufficiency program, which links participants to community agencies to help them become self-sufficient through individualized goal setting. expanded the program to include clients from the Montana Department of Commerce (MDOC). Resident councils, an Advisory Board and the Family Self-Sufficiency Panel are involved in providing input on program needs and assisting others to become actively involved in the process.

Each year, HomeFront goes through a process to assess physical needs addressed by tenants through their Resident Advisory Board for the Annual Plan process; comments are also solicited via Resident Council functions throughout the year. These comments, Board participation, tenant commissioners, and Public Housing Asset Managers' daily communications with HomeFront's client base serve to assist in assessing client needs for physical adjustments, security issues, and needed links with the community. The physical needs requests are implemented along with staff recommendations in the Capital Fund planning process.

Additional information relative to HomeFront's successes is included in the five-year plan on file at the HomeFront office.

**Actions taken to provide assistance to troubled PHAs.**

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Not applicable. HomeFront received certification from HUD for sustaining a High Performer Status for the Public Housing Assessment System and, therefore, a review of troubled status needs is not required as part of the Consolidated or Annual Action Plan. HomeFront has also consistently received a score of 100% from HUD for the SEMAP (Section 8 Management Assessment).

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.**

91.220 (j); 91.320 (i)

According to the City's most recent Analysis of Impediments to Fair Housing Choice, most of the typical exclusionary provisions that would hinder affordable housing development do not exist in the current Billings zoning codes. However, the following issues may act as barriers to affordable housing investment:

- Density bonuses have not been established to offset the cost of development if a project contains a certain percentage of affordable housing.
- There is currently not a way to fast-track the approval processes for affordable housing development projects.

However, fast-tracking may not be as important in Billings as it is in other parts of the country. Subdivision review times are set by the Montana State Legislature. Building permit reviews for single-family homes (one to four units) are three to five days and commercial permits, including multi-family with five or more units in a structure, take four to six weeks to review. Other areas of the country, and some cities in Montana, take 30 days or longer for single-family reviews and four to six months for commercial reviews.

- The City does not currently permit a waiver or reduction of impact fees, including water and wastewater system development fees, to promote affordable housing development.
- The use of accessory dwelling units is not a widely practiced housing development strategy.

**Project Re:Code:** The City has undertaken a large-scale initiative to modernize zoning regulations to ensure equal opportunity and housing affordability citywide. Several AmeriCorps Volunteers in Service to America (VISTA) members have been placed in the City's Planning Division to assist with this effort.

**Analysis of Impediments to Fair Housing Choice:** In early 2017, the City of Billings started collaborating with entities across Montana to construct a regional 2020 fair housing analysis utilizing data and formatting recently made available through HUD's [Assessment of Fair Housing](#) initiative. This collaboration includes partnerships with the State of Montana's Department of Commerce (MDOC), the City of Missoula, and the City of Great Falls. Seven full-year AmeriCorps Volunteers in Service to America (VISTA) members have been placed to assist with this fair housing / equal opportunity initiative:

- **Montana Department of Commerce, Helena:** One member began in July 2017 and one additional member began in January 2018.
- **City of Billings:** One member began service in August 2017 in the Community Development Division. Two members began service in the Planning Division in January 2018.
- **Cities of Great Falls and Missoula:** One VISTA member was placed in each of these jurisdictions in January 2018 and a third VISTA member was placed in Missoula in January 2019.

The City's Analysis of Impediments to Fair Housing Choice was drafted in 2020 and is available online at [www.BillingsMT.gov/CDreports](http://www.BillingsMT.gov/CDreports).

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**Actions taken to address obstacles to meeting underserved needs.** 91.220(k); 91.320(j)

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The City has been meeting underserved needs through the following programs:

- **Create, Preserve, and Expand Affordable Housing:** Housing Rehabilitation, Affordable Housing Development, and First Time Home Buyer
- **Neighborhood Revitalization - Foreclosures:** The City's Foreclosure Acquisition / Rehabilitation loan program.
- **Poverty Impact:** Billings Metro VISTA Project

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**Actions taken to reduce lead-based paint hazards.** 91.220(k); 91.320(j)

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The City continues to be in compliance with HUD's lead-based paint requirements as established in September of 2000. According to the American Community Survey estimates from 2007-2011, there are over 29,317 housing units built before 1979 that are at risk of containing lead-based paint, which comprises 64 percent of the total housing stock in Billings. Not all of the homes built prior to 1979 contain lead-based paint and lead hazards. However, projects involving structures built prior to 1978 are considered to have the potential for lead-based paint and consistent procedures have been developed to ensure compliance with federal regulations.

In 2012, the Center for Disease Control recommended action for children with elevated levels greater than or equal to five ug/dL. The Montana Department of Public Health and Human Services cited a [2012 field study](#) conducted in 11 counties in the state. Children enrolled in Medicaid aged one to five years were tested for elevated blood lead levels. Nearly 600 children participated in the study, and three percent of the children had levels  $\geq$  five ug/dL. One in four of the children tested had  $\geq$  one ug/dL. This information is the latest data available on children in Montana and exposure to lead to date.

The City will continue to practice diligence while undertaking rehabilitation and construction activities in order to maintain the safety of households participating in federal programs. Participants in the City's housing programs are made aware of lead-based paint requirements. Education on the hazards of exposure to lead-based paint is provided for each rehabilitation project. The City currently offers risk assessment, paint inspections, and clearance testing through certified professionals. The City also has access to certified, lead-safe and abatement contractors to ensure compliance.

In addition, City staff promotes lead-safe work practices training whenever it is offered in Montana, which gives local contractors the opportunity to become certified in lead-safe work methods. The City will continue to maintain working relationships and partner in furthering educational efforts with lead-based paint professionals to ensure HUD requirements are effectively met.

In summary, the City of Billings has achieved full compliance with HUD lead-based paint requirements. City staff continues to develop local contractor capacity for regulatory compliance. Certified Risk Assessors are utilized for assessments and clearance activities. All rehabilitation projects facilitated and monitored by City staff are brought to lead-safe standards.

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**Actions taken to reduce the number of poverty-level families.** 91.220(k); 91.320(j)

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The City supports efforts to improve economic conditions and supports activities to address economic conditions of low-income households in Billings. All of the Consolidated Plan strategies target the improvement of economic conditions of lower income households in the community, including housing development, financing home repair and buyer activities, continuing partnerships to support community needs and funding public service activities. Specifically, the City's efforts to reduce the number of persons

living below the poverty level include CDBG and HOME funding allocations to home buyer / repair programs. The results of this fiscal year's actions are as follows:

- **First Time Home Buyer:** Extremely low and low-income households acquired their first home.
- **Foreclosure Acquisition / Rehabilitation:** When units are completed, low-income households are able to purchase a fully-renovated home.

The City has continued to work with nonprofit organizations to help address the human service needs of lower income residents of the community in general and also to serve lower income neighborhoods. This has been achieved in the past through funding allocations to social service organizations under CDBG Public Service activities, including the VISTA program. In addition, HOME program requirements stipulate serving low-income households exclusively.

The City of Billings - Community Development Division staff began working with the AmeriCorps VISTA program in 2007 to assist with the development and implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness. This project generates full-time volunteers to work in nonprofit organizations to support homeless and poverty-impact initiatives.

By July 2009, the City had earned an official project designation and the Billings Metro VISTA Project was established. This initiative is particularly important when funding levels decline; all work completed must impact poverty and homelessness. Volunteers work to provide social services to those experiencing homelessness and / or poverty. Examples of projects undertaken this fiscal year include: furthering childhood literacy and food security for public housing residents at HomeFront; assisting the Parks and Recreation Department expand food security for low-income households through the development of a community garden located in Billings' Southwest Corridor neighborhood; assisting economically disadvantaged children succeed in education through monitored mentoring programs; and expanding health education for American Indians in Billings.

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**Actions taken to develop institutional structure.** *91.220(k); 91.320(j)*

The City of Billings is the lead government entity responsible for Consolidated Plan activities funded through CDBG and HOME. The City's ability to carry out home repair / buyer and poverty impact programs relies heavily on partnerships in the community, representing a significant strength in institutional structure. Gaps in institutional structure would, in part, be remedied with additional administrative funds to further coordinate services.

The City has been strengthening institutional structure by carrying out housing, homeless and other community development activities to address the following priorities as listed below.

**Create, Preserve, and Expand Affordable Housing and Neighborhood Revitalization:** The City has the comprehensive ability to address priority needs through home repair programs such as Housing Rehabilitation and Foreclosure Acquisition / Rehabilitation programs. Private-industry contractors are trained in lead-safe work methods and staff advertises contractor opportunities through print media, on the City's website, and through the Adjacent Neighborhood Task Force through public informational meetings. Emphasis continues on the provision of opportunities to Section 3, minority and women-owned businesses and furthering equal opportunity to low-income owners / employers, racial / ethnic minorities and businesses owned by women.

The City maintains positive relations with HomeFront, CDBG and HOME officials at the Montana Department of Commerce, private industry developers, lenders, realtors and others to ensure collaboration and engagement in the implementation housing programs. The City has two currently certified nonprofit CHDOs and is actively seeking additional project opportunities for the purposes of affordable housing development.

**Poverty Impact:** CDBG and HOME resources are not adequate to meet the needs of the homeless and those experiencing poverty in Billings. The City's main anti-poverty initiative is the implementation of the Billings Metro VISTA Project. The City has provided full-year and summer associate VISTA support to dozens of nonprofit organizations in the Billings area to date. The Billings Metro VISTA Project enables the City to support nonprofit organizations in a sustainable fashion since the provision of public service grants is no longer an option due to historically low CDBG allocations.

**Actions taken to enhance coordination between public and private housing and social service agencies.**  
*91.220(k); 91.320(j)*

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The City of Billings staff works in collaborative partnership with social service providers, other government agencies, and the private sector to further community development programs, including HomeFront and the CDBG and HOME administrators at the Montana Department of Commerce.

City staff believes positive collaboration and coordination of programs and services will enhance the community's ability to meet the needs of low-income citizens. The City has continued coordinating with public, private, and social service agencies to further activities and projects identified herein, including participation in the following groups and initiatives:

- **Adjacent Neighborhood Committee:** The Planning and Community Services Department facilitates a quarterly meeting for the Neighborhood Task Force officers to collaborate. The City Council has dedicated \$12,000 in non-federal funds to support Task Force newsletters, public information mailings, and community events.
- **Community Innovations Initiatives:** In October 2014, staff members from the Community Development Division, City Administration, and the Downtown Billings Alliance facilitated the Community Innovations Summit. The Summit was the catalyst for a multi-jurisdictional, coordinated response to downtown street homelessness. City staff and community leaders addressed legislation, the justice system, law enforcement and business environments. [An article](#) published by the Billings Gazette, highlights immediate successes as a result of this collaboration.
- **Resource Map and Notepad:** City staff has continued to make available the City's *Resource Map* and *Notepad*, which includes a comprehensive downtown service directory. A group of social service providers is working on an update to this document and the group has garnered funding for printing.
- **Billings Metro VISTA Project:** The City has assisted dozens of nonprofit social service organizations to expand and enhance programs for the homeless and those experiencing poverty. Priority focus areas include housing, financial literacy, employment, education, food security and access to healthcare.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

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The City's most significant achievement is the adoption of [Project Re:Code](#). This initiative was the City's first chance, in nearly a half-century, to adopt modern zoning regulations that meet the communities' stated goals and aspirations. This community-led process began in January 2018 and was steered by an ad hoc committee comprised of city and county representatives. The new zoning code was passed by the Billings City Council in January 2021.

The new zoning code has also spurred reinvestment and there is a significant increase in the number of remodeling permits for additions to existing residential homes, particularly in older neighborhoods. Accessory dwelling units can now be placed in most residential neighborhoods; a significant achievement for affordable housing development.

The [City of Billings Pattern Guide](#) is designed to provide guidance to homeowners, home builders, and small business owners looking to invest in the First Neighborhoods of Billings. The guide provides character profiles for several of the lower-income neighborhoods including the South Side, North Park, and Central-Terry.

The City's Analysis of Impediments to Fair Housing Choice revealed the beginnings of segregated neighborhoods and lending discrimination for Hispanic Americans in Billings. The Analysis contained the following recommendation:

*Billings should establish a housing service center... where home seekers are introduced to housing options beyond the racial or ethnic neighborhoods to which they often feel they are limited.*

The City sponsored a full-year VISTA member to assist NeighborWorks Montana in researching the feasibility of establishing a comprehensive housing center to serve low-income renters and homeowners. The VISTA member facilitated a working group comprised of the Billings affordable housing organizations to bring the Home Center into fruition. Participants included the City of Billings, HomeFront, Rebuilding Together Yellowstone County, District 7 HRDC, Rural Dynamics, Beartooth Resource Conservation and Development, and Homeward.

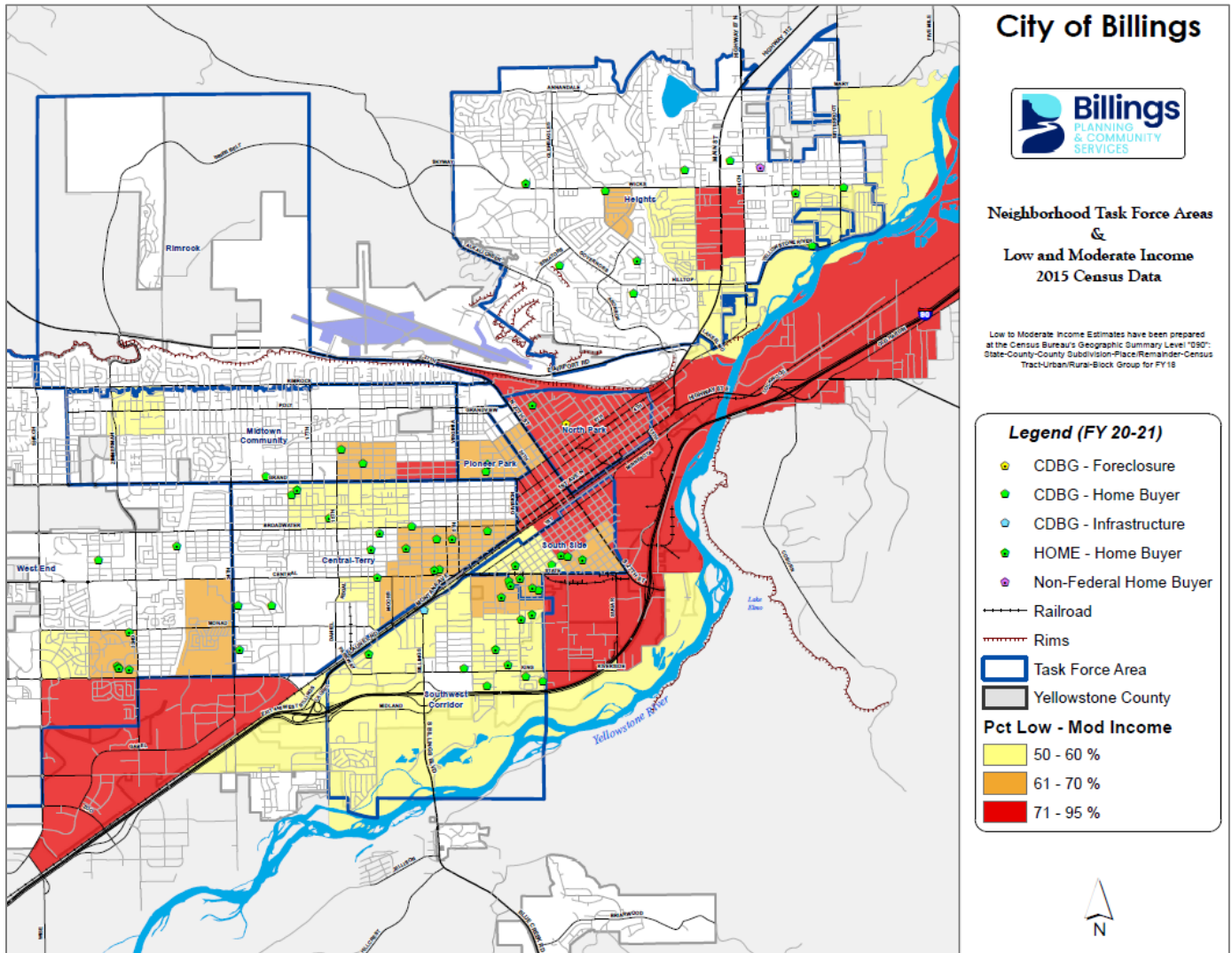
After 18 months of planning, the Home Center opened in July 2015 and it is located in downtown Billings, which is central to the City's low-income neighborhoods. The City provided a second, full-year VISTA member from July 2015 to July 2016 to help create the Home Center's housing programs. Today, the Home Center provides comprehensive housing services including information on available units, fair housing information, housing education and counseling. Housing services are coordinated under one roof, creating the opportunity for potential homebuyers and renters seeking safe, affordable homes and access all housing services in a one-stop-shop.

The City has focused distribution of investments on a citywide basis in order to support diversity and mixed-income development across the community. The City's performance in serving predominantly low-income households is clear via Integrated Distribution Information System (IDIS) reporting; nearly 100%.

Neighborhood Revitalization Strategy areas have not been established in Billings and there is no specific amount of funding allocated for a target area in the City's geographic distribution of resources. Therefore, the City has dedicated zero percent of funding to target areas in favor of supporting a citywide approach to further fair housing, equal opportunity and anti-segregation efforts.

The following map clearly illustrates the disbursement of federal investments to promote equal opportunity in all neighborhoods for the City's home buyer, repair and foreclosure programs for this fiscal year. One infrastructure project is currently underway. The C & C Community is a resident-owned, manufactured housing project and CDBG funding has been allocated for infrastructure and street improvements.

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**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

Overall monitoring includes the following for CDBG and HOME programs:

- Examination of the community's use of available HUD, state, and local resources to meet the affordable housing and community development needs as outlined in the Consolidated Plan.
- Examination of the effectiveness of, and demand for, the Community Development Division's programs.
- Review of public comments received on the community's performance in meeting the affordable housing and community development needs described in the City's Consolidated Plan.

**Organizations:** The City may fund a variety of organizations to carry out CDBG and HOME activities each year. Written agreements are executed that describe applicable regulations, the scope of work and funding. This fiscal year, the City entered into an agreement with NeighborWorks Montana to develop two homeownership housing units. Organizations receiving City funds are monitored by Community Development staff to ensure compliance with the terms of the agreement and applicable regulations, including Section 3 and minority business outreach.

**Affordable Housing Projects:** Housing projects are monitored via desk review and / or site-visits, including inspections, on a schedule based on the number of units in the project:

<b># of Units</b>	<b>Frequency of On-Site Monitoring</b>
1 - 4 Units	Every 3 years
5 - 25 Units	Every 2 years
26+ Units	Every year
Source Documentation	Every 6 years
<i>Staff inspects 15% - 20% of the total HOME units per project, minimum one unit in each building</i>	
10+ HOME-Assisted Units = Annual Financial Review	

*Chart omitted from IDIS*

On-site visits include property standards completion and ongoing compliance inspections, tenant file review, household income verification, etc. City staff also conducts annual desk reviews to ensure leases are in compliance with HOME regulations; rents are compliant with HOME limits; tenant incomes are reviewed annually and they are within eligibility limits; the property owner/manager is inspecting the property at least annually; that adequate project reserves have been established and annual reports are received; and the year-end profit and loss statements show the project is profitable and/or sustainable for the period of affordability.

**Risk Assessments:** Affordable housing projects are also scrutinized via routine Risk Assessment in order for City staff to evaluate the relative level of risk of noncompliance for each project in the assisted portfolio. The risk assessment includes reviewing:

- Number of units
- Staff turnover and experience
- Funding amounts, affordability periods and type of assistance provided
- File and project documentation
- Past performance

Projects with higher risk assessment scores are prioritized for intensive case management efforts to bring the project into compliance. These projects typically undergo multiple site visits and extensive technical assistance from City staff.

**First Time Home Buyers:** Homebuyers receiving HOME assistance are monitored for residency requirements annually through the United States Postal Service. City staff sends a newsletter via first class mail to each assisted household. If homeowners have changed primary residency, the mail is returned to the City office. Noncompliant projects are prioritized for intervention through the City's legal office.

**Community Housing Development Organizations (CHDOs):** The City requires CHDOs apply for recertification on an annual basis to ensure continued requirements are being met for CHDO designation throughout applicable affordability periods. The application includes (but is not limited to) maintenance of Board composition, including at least one-third membership by residents of low-income neighborhoods and no more than one-third may be public officials or local / state employees. Staff also conducts a CHDO capacity review every time a new project is funded to ensure the organization has the ability to carry out functions of the proposed project. This fiscal year, NeighborWorks Montana and Homeword were certified as active CHDOs.

**Citizen Participation Plan: Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.** *91.105(d); 91.115(d)*

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Federal regulations require the City to facilitate two public hearings, at different stages of the program year, to obtain residents' views and respond to questions. Together, the hearings must address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, and a review of program performance.

The City of Billings held a public hearing in September 2022 to obtain public comment on:

- CDBG and HOME Comprehensive Annual Performance Evaluation Report (CAPER) for the prior program year; and
- Current community needs to assist the Community Development Board in:
  - Designing the application process for the upcoming program year, before the publication of the drafted Annual Action Plan; and
  - Identifying the needs of those experiencing homelessness in preparation for HOME-ARP assessment and activities.

As noted in the first section of this CAPER (CR-05), the public comment period for the City's CDBG and HOME CAPER exceeds the minimum 15-day requirement. A public hearing is also held before the Billings City Council at the end of the public comment period. Notice of both the public comment period and hearing are published in a local newspaper for three consecutive weeks. Public comments are noted in the first section of the CAPER.

The City's Citizen Participation Plan includes garnering input throughout annual allocation and performance reporting procedures and continuing to work with stakeholders to address needs. City staff encourages citizen participation in the consolidated planning process and makes special efforts to include low-income citizens, minorities, non-English speaking persons, persons with disabilities, and female-headed households. City staff is also fully prepared to comply with Citizen Participation requirements for the development of the Assessment of Fair Housing.

**Community Development Board:** The City of Billings created the Community Development Board in the 1970s to ensure low-income citizen participation and consultation for the use of federal funds. By City

ordinance, six of the nine Board members must reside in low-income areas or be designated as representatives of a low-income neighborhood.

The Board meets on the first Tuesday of each month and is responsible for making recommendations to the City Council for the use of federal funds and monitoring program implementation. The Board members review drafted Consolidated Plans, Annual Action Plans and CAPERs and they annually attend Neighborhood Task Force meetings and public events to promote the City's programs.

**Website Posting:** The drafted CAPER was posted to the City's website and a public notice was published for three consecutive weeks to notify the public about the drafted document and the City Council's public hearing.

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**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

The coronavirus pandemic's impact has greatly impacted the Billings community. The Delta variant surge in August and September 2021 has not influenced the City's goals and strategies, as they are still relevant (see below), although the City may not meet established goals due to pandemic-related challenges. However, funding allocations and how funding may be utilized is expected to change.

The City's core programs have also been impacted by the pandemic. Foreclosed homes are currently not available for the City to acquire, rehabilitate, and sell to low-income households. The cost of building supplies, lack of contractors available, and homeowner hesitancy to allow contractors in and out of their homes has stalled the City's Housing Rehabilitation program. Despite frequent publication and solicitation, developers are not responding to the City's Request for Proposals to develop new affordable housing for the City's foreclosure project on Steffanich Drive.

City staff received an Affordable Housing Development program application from HAB Development for boiler repair, rehabilitation, and the installation of new heating / cooling systems for 40 units dedicated to serving those experiencing homelessness and individuals and families needing isolation and / or quarantine. This project was cancelled by HAB Development in April 2022.

The City will need to remain flexible and willing to make substantial amendments to Annual Action Plans as the coronavirus pandemic forces changes in community needs. Maintaining the City's close- and shovel-ready prioritization is a pinnacle to community response.

**Goals and Objectives**

- Create, preserve, and expand affordable housing options
  - Encourage the citywide development of new affordable single-family, multi-family and special needs housing in the community through private developers and nonprofit organizations.
  - Provide direct, affordable financing and assistance to low income homeowners for the completion of needed repairs citywide.
  - Provide affordable financing and support to promote homeownership opportunities citywide.
- Neighborhood Revitalization: Foreclosures
  - Revitalize neighborhoods through foreclosure remediation, redevelopment and infill development. Impact Poverty
- Impact Poverty
  - Provide public service activity funding to support the Billings Metro VISTA Project to support local nonprofit organizations expand services for the homeless and special needs populations: Healthcare; Food Security; Education; Employment; Financial Literacy; and Housing.
- Prevent, prepare for, and respond to coronavirus
  - Provide public service activity and public facility improvement funding to prevent, prepare for, and respond to the coronavirus. Priority needs have been identified in the City's Community Assessment Report, including, but not limited to:

- Low-Income Beneficiaries: Rent, mental health care, meal distribution, mortgage payments, internet access, utility assistance, childcare, etc.
- Public Improvements & Facilities: Handwashing stations, additional public restrooms / cleaning, infrastructure, etc.
- Social Service Agencies & Public Health Support: Client remote access, vaccination activities, virtual service ability, exposure prevention - staff training, unmet hospital / public health needs, FEMA match, facility social distancing, etc.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

The City of Billings - Community Development Division does not have an open BEDI grant.

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**Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations.**

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

City staff conducts annual reviews of affordable rental housing projects funded through the HOME program throughout the affordability period. HOME-funded projects requiring on-site inspections this year included: Old Town Square apartments (HomeFront of Billings); Southern Lights apartments (Homeward); Magic City Terrace apartments (Volunteers of America); Westchester Square apartments (HomeFront of Billings) and Pheasant Home apartments.

All of the issues detected during the inspection of HOME-assisted units were minor and were immediately remedied. A second floor bedroom was missing a screen which was replaced. Another property needed to have a smoke detector replaced and one burner on a stovetop replaced. All of the projects were reviewed this year and staff determined that they are being operated in compliance with HOME program regulations. Properties not meeting compliance with regulations are addressed through case-management and a targeted provisional work plan is created to bring the project into compliance.

**Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.** 92.351(b)

The City adheres to an Affirmative Marketing Procedure to further the City's commitment to nondiscrimination and equal opportunity in housing. The intention of City staff's efforts is to attract those who are least likely to apply for housing and community development programs. City staff has assessed affirmative actions taken and believes the marketing completed for HOME units is adequate.

**Affordable Housing:** Proposed affordable housing development projects with more than five HOME units are required to submit an Affirmative Marketing Plan with the application for funding. Plans include procedures for marketing units to minority / disabled populations and performing significant outreach to ensure equal housing opportunity for potential renters / owners of the housing units.

Affirmative Marketing Action Plans were also reviewed during annual monitoring reviews. Organizations list the process by which they are marketing vacant units (rental offices, the local newspaper, and entrance of the project) in attempt to reach different minorities, genders, and the disabled.

**Home Buyer:** In recent fiscal years, information regarding the home repair / buyer programs and contractor opportunities have been distributed as follows:

- City staff routinely emails fliers to agencies serving the elderly, disabled and those experiencing homelessness including HRDC District 7, Rimrock, Family Service, Inc., the Mental Health Center and the Community Crisis Center.
- A flyer describing the home repair programs has been sent to low-income homeowners previously assisted through the First Time Home Buyer program and to local lenders.
- Print advertising appeared multiple issues of *Tidbits of Billings* (a weekly publication).
- Printed brochures and information are continually distributed through the Billings Home Center.
- Before the pandemic, over 35,000 full-color direct mail inserts were distributed to City residents via water bills.

- Distributed printed flyers, brochures and information through the Office of Indian Education and the Indian Health Board of Billings.
- Information, applications, and other information are continuously available on City of Billings' website [here](#).

**Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

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A total of \$496,911 in program income and recaptured funds was received in the HOME program this fiscal year. Funding was committed and expended this fiscal year via the First Time Home Buyer program.

HUD requires the City of Billings to utilize program income, repaid, and recaptured revenues prior to drawing down entitlement funds. Therefore, staff reduces previously committed entitlement funds from IDIS activities and replaces it with cash revenue funds for immediate use. The Consolidated Plan stipulates that federal resources will be allocated on a close- and shovel-ready basis, ensuring the efficient use of funds in programs that are in higher demand.

A total of 27 households achieved homeownership through the First Time Home Buyer program, 17 of which were funded using HOME dollars. The average purchase price of the homes was just under \$192,000. Last fiscal year, the average purchase price was \$173,000. One of the HOME-assisted homebuyer households were minorities, and six households were single-headed households. One household was extremely low-income and the remaining households were low-income.

**Describe other actions taken to foster and maintain affordable housing. 91.220(k)**

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The City has been managing the following programs to foster and maintain affordable housing:

- **Create, preserve, and expand affordable housing options**
  - First Time Home Buyer, Affordable Housing Development, and Housing Rehabilitation
- **Neighborhood Revitalization:** Foreclosure Acquisition / Rehabilitation
- **Poverty Impact:** Billings Metro VISTA Project
- **Prevent, prepare for, and respond to coronavirus**
  - **Public Services:** Rent, mental health care, meal distribution, mortgage payments, internet access, utility assistance, childcare, etc.
  - **Public Facility Improvements:** Handwashing stations, additional public restrooms / cleaning, infrastructure, etc.
  - **Social Service Agencies & Public Health Support:** Client remote access, vaccination activities, virtual service ability, exposure prevention - staff training, unmet hospital / public health needs, FEMA match, facility social distancing, etc.

## *ATTACHMENT A - Public Notice*

## *ATTACHMENT B - Public Comments*

The City of Billings will hold a public hearing on Monday, September 12, 2022 at 5:30 pm to obtain public comment on:

- CDBG and HOME Comprehensive Annual Performance Evaluation Report (CAPER) for the prior program year;
- Designing the application process for the upcoming program year, before the publication of the drafted Annual Action Plan; and
- Identifying the needs of those experiencing homelessness in preparation for HOME-ARP assessment and activities.

Federal regulations require the City to facilitate two public hearings, at different stages of the program year, to obtain residents' views and respond to questions. Together, the hearings must address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, and a review of program performance.

Public comments include: