



Annual Action Plan

FY2026-2027

DRAFT

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Section I: Executive Summary

Introduction

The U.S. Department of Housing and Urban Development (HUD) requires both a five-year Consolidated Plan and a one-year action plan for the City of Billings to qualify for funding under the Community Development Block Grant (CDBG) and HOME Investment Partnerships programs. The City's five-year Consolidated Plan for FY2025–2029 outlines activities scheduled from July 1, 2025, through June 30, 2030, to address community priorities and serves as the strategic framework for utilizing CDBG and HOME funds. This one-year Annual Action Plan addresses priority needs and outlines the use of the City's CDBG and HOME funding for activities to be carried out from July 1, 2026, to June 30, 2027.

As an entitlement community, the City of Billings, through its Community Development Division, will continue to lead and manage the administration of its CDBG and HOME program activities, ensuring that all initiatives primarily benefit low-income individuals. The Consolidated and Annual Action Plans integrate both planning and application requirements for these programs, aligning all activities with the community's prioritized needs.

The CDBG and HOME programs covered by the Consolidated Plan have three basic goals:

- **To provide decent housing**, including maintaining affordable housing stock in the community; increasing the availability of permanent housing that is affordable to low-income households without discrimination; increasing support of housing that enables people with special needs to live independently; and assisting homeless people to obtain affordable housing.
- **To provide a suitable living environment**, including improving the safety and livability of neighborhoods; increasing access to quality facilities and services; reducing the isolation of low-income households within areas by de-concentrating housing opportunities and revitalizing deteriorating neighborhoods; restoring and preserving natural and physical features of special value for historic, architectural, or aesthetic reasons; and conserving energy resources.
- **To expand economic opportunities**, including creating jobs accessible to low-income individuals; providing access to credit for community development activities promoting long-term economic and social viability; and empowering low-income people living in public and federally assisted housing to achieve self-sufficiency.

Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City's goals are to effectively manage the implementation of HUD-funded programs; create, preserve, and expand affordable housing options; ensure that vulnerable populations have reliable access to support services; and foster suitable living environments. The city's strategies aim to improve the safety and livability of neighborhoods, enhance access to quality facilities and services, and expand economic opportunities for lower-income residents. The City will continue to offer programs on a citywide basis to ensure equal opportunity in all Billings neighborhoods.

Administration

Goal: Efficiently manage the implementation of objectives, strategies, and initiatives for HUD-funded programs and projects and ensuring federal regulatory compliance.

Affordable Housing

Goal: Create, preserve, and expand decent, affordable housing options for low-income residents citywide. Community Development aims to enhance and broaden housing access, availability, physical quality, economic value, and longevity across the city for Billings' low-income residents including seniors, individuals with disabilities, minority groups, and other special populations.

Strategy: Increase affordable housing opportunities by implementing financing initiatives, including housing development loans to drive construction and rehabilitation, first-time homebuyer loans to support sustainable ownership, and home repair financing to preserve and upgrade existing low-income homes.

Key Initiatives

- **Affordable Housing Development:** Promote citywide development of affordable single-family, multi-family, and special needs housing by offering loan financing to private developers and nonprofit organizations for new construction, rehabilitation, and infrastructure improvements.
- **First Time Home Buyer:** Offer accessible loan financing to foster first-time homeownership opportunities that support long-term financial stability, build generational wealth, and stabilize neighborhoods.
- **Home Repair:** Offer loan financing to agencies that assist low-income homeowners in completing essential repairs - such as major systems upgrades, weatherization, energy/water efficiency, and lead water service line replacements - to enhance and preserve the quality of Billings' affordable housing stock.
- **Foreclosure:** Mitigate the adverse effects of vacant, foreclosed properties by acquiring, rehabilitating, and selling these homes to low-income households - thereby combating urban decay, reducing crime, stabilizing property values, and stimulating the local economy.

Services for Vulnerable Populations

Goal: Ensure that vulnerable populations have reliable access to comprehensive supportive services that enhance stability, self-sufficiency, and overall well-being.

Strategy: Provide resources to nonprofit organizations to address poverty and provide supportive services to low-income individuals and families to provide stable housing, promote self-sufficiency, and promote overall well-being:

Key Initiatives

- **Public Facilities:** Provide financing to develop public facilities to serve as accessible, community-based hubs where individuals and families facing economic, social, or health-related challenges can find help.
- **Billings Metro VISTA Project:** Allocate AmeriCorps resources to nonprofit organizations to undertake poverty impact activities and to support the low-income individuals and families they serve. Federal AmeriCorps Volunteers in Service to America (VISTA) focus areas include education, healthcare, food security, economic opportunity, housing, financial literacy, and others.

- **HOME-ARP:** Provide grant funding to nonprofit organizations delivering supportive services to prevent homelessness; unhoused individuals and families; those at-risk of becoming unhoused; and people fleeing domestic violence / trafficking. Federal service categories include case management, housing counseling, rent/utilities/deposit assistance, mental health, healthcare, substance misuse treatment, job training, employment, financial literacy, assistance with benefits enrollment, childcare, and transportation.

Neighborhood Revitalization

Goal: Foster suitable living environment and quality of life through the improvement of physical conditions in lower-income neighborhoods.

Strategy: Integrate environmental design, infrastructure improvements, and public safety measures to revitalize neighborhoods, prevent crime, and enhance quality of life for residents.

Key Initiatives

- **Crime Prevention Through Environmental Design:** Reduce crime by making infrastructure improvements in low-income neighborhoods (parks, adding streetlights, etc.) while: creating more attractive and secure environments; stimulating local investment; encouraging residents to use public spaces more freely; and improving quality of life for low-income residents.

Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Overall, the City of Billings demonstrates a commitment to utilizing CDBG and HOME funds effectively, focusing on affordable housing development, community engagement, and strategic planning to meet the evolving needs of its residents.

The City of Billings has been receiving CDBG funds since the 1970s and began receiving HOME funds in the mid-1990s. Performance on past goals and projects has been adequate, given declining resources. As a result, City staff have consolidated smaller programs focused on meeting priority needs, including affordable housing preservation and the provision of new housing opportunities. Community Development staff have:

- Maintained core loan programs such as Affordable Housing Development, First Time Home Buyer, Foreclosure Acquisition / Rehabilitation, and the Billings Metro VISTA Project to assist in meeting timely expenditure deadlines.
- Facilitated financing for a \$1.2 million Affordable Housing Development project to create 32 new rental units to benefit low-income households in the Mitchell Court rental housing project. The Community Development Board and Billings City Council also awarded over \$1.5 million to the LB Lofts project to create 101 affordable rental units, pending formal funding commitment in later 2026.
- Successfully carried out additional activities to respond to, prepare for, and prevent the spread of the coronavirus. As of January 2025, City staff has completed all CDBG-CV projects and drawn down over \$900,000 in additional federal funding allocated for coronavirus projects.
- Developed a HOME-ARP Allocation Plan and funded supportive services to assist those experiencing homelessness, those at risk of becoming unhoused, and other qualifying populations. As of March 2026, nearly half of the funding has been expended and 76% has been committed to several local nonprofit organizations.

Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

To foster broad community involvement, the City of Billings has implemented a Citizen Participation Plan during the Consolidated Plan process, ensuring active engagement by residents and affiliated organizations. Additionally, a Language Assistance Plan has been adopted to guarantee that all individuals, including those with hearing impairments and limited English proficiency, have meaningful access to program information and equal opportunities to participate.

Several local organizations active in affordable housing and the community have been invited to review and comment on the Consolidated Plan. Their ongoing collaboration is essential for meeting the plan's affordable housing goals. The consultation process involved both public and private agencies including those providing health care, social services, and fair housing education. Staff also sought to gather input from residents of low-income neighborhoods and from agencies serving children, the elderly, individuals with disabilities, minorities, people with HIV/AIDS and their families, as well as homeless individuals and families. Both plans can be found online at BillingsMT.gov/CDreports.

Consolidated Plan Outreach and Engagement

- Community Development staff began citizen participation and outreach efforts in August 2024 with a presentation to the City Council to describe HUD programs and processes and garner understanding of the Council's funding priorities for the 2025-2029 Consolidated Plan.
- The Billings City Council held a public hearing on Monday, September 23, 2024, to obtain public comment on current community needs to assist the Community Development Board in designing the application process for the upcoming year, before the publication of the drafted Consolidated / Annual Action Plan.
- Community Development staff presented during a City Council Work Session meeting on November 18, 2024. Topics included: prior work session material, recent challenges Community Development is navigating to move the Consolidated Plan forward, seeking clarity on the Council's goals for the new Consolidated Plan, schedule review, public engagement, etc.
- City Council regular meetings and Work Sessions are streamed live and video is available on demand at www.comm7tv.com. Meetings are also streamed live and video is available on demand at www.facebook.com/comm7tv. Public notices are published in the Yellowstone County news for public meetings and hearings including the monthly public Community Development Board meeting.
- Staff and the Community Development Board made presentations to low-income neighborhood task forces to present information on the Division and to identify community needs to address with CDBG and HOME.
- Hard copy and online surveys were distributed via email and in-person to hundreds of individuals and organizations to seek public input on community needs and funding priorities. A QR code was also included in the [Planning and Community Services Department's annual report](#), which was widely distributed.
- Four weekly ads, with a QR code to the survey, were published in the Yellowstone County News (February 14 – March 7, 2025).
- Social media was utilized to garner CDBG, HOME, and AmeriCorps VISTA applications for funding and resources. Social media was also utilized to distribute the Consolidated Plan survey on community needs and funding priorities.

- Email listservs were utilized to garner input on various sections of the Consolidated Plan, to distribute surveys, and to garner information relative to community needs and funding priorities.
- Another public hearing was held on February 4, 2025, at the Community Development Board meeting to garner public comment on community need and for organizations interested in funding to present information on applications submitted.
- A City Council work session was held March 17, 2025, to discuss the Consolidated Plan Goals and Strategies.
- The City Council held a public hearing regarding the Draft 2025-2029 Consolidated Plan at their April 14, 2025, meeting and approved the plan during their April 28, 2025, meeting.

FY2026-2027 Annual Action Plan Outreach & Engagement

- The Billings City Council held a public hearing on September 22, 2025, to garner comments on the Comprehensive Annual Performance Evaluation Report and input on 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.
- The Community Development Board held a public hearing during their regular monthly meeting on February 3, 2026.
- The FY2026-2027 Annual Action Plan is available online from March 14 through April 13, 2026. The Billings City Council will hold a public hearing during their regular business meeting on April 13 and will act on April 27, 2026.

Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A summary of public comments is in the Appendices.

Summary of comments or views not accepted and the reasons for not accepting them

All comments are taken into consideration during the development of the Annual Action Plan.

Section II: The Process

PR-05 Lead & Responsible Agencies

24 CFR 91.200(b)

Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

The City of Billings - Community Development Division staff are responsible for preparing the Consolidated Plan and administration of CDBG and HOME grant programs.

Agency Role	Name	Department/Agency
CDBG Administrator	City of Billings B. Beckett, Division Manager	Community Development Division
HOME Administrator		

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

B. Beckett, Community Development Manager
Community Development Division, 316 North 26th Street, Fourth Floor, Billings, MT 59101
Phone: 406-657-8286 TTY 711
Email: beckettb@billingsmt.gov
Web: Billingsmt.gov/comdev

Introduction

Several community organizations are invited to participate in planning activities related to affordable housing and community development in Billings and are encouraged to review and comment on the Consolidated Plan and Annual Action Plans. Consultation includes outreach to public and private agencies that provide health care, social services, and fair housing education. Agencies serving children, older adults, people with disabilities, minority populations, people with HIV/AIDS and their families, and individuals and families experiencing homelessness are specifically included in the consultation process.

The Consolidated Plan is widely distributed during the public comment period, and interested people are invited to attend staff-facilitated public meetings and regularly scheduled Community Development Board meetings to learn more about community development initiatives. The Community Development Board serves in an advisory role, and a majority of its members represent lower-income neighborhoods, ensuring that the perspectives of low-income residents are incorporated into planning and decision-making.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies (91.215(l)).

The City of Billings, Montana actively fosters collaboration between public and assisted housing providers and private and governmental health, mental health, and service agencies.

Adjacent Governments: Communication regarding non-housing community development needs is conducted via collaboration through adjacent units of local government including the State of Montana and Yellowstone County. [91.100\(a\)\(4\)](#)

Public Housing: The City's local public housing authority, [HomeFront](#), is dedicated to providing affordable housing and promoting self-sufficiency for moderate and lower-income families. HomeFront is primarily responsible for administration of the public housing and Section 8 programs for the community. The organization also collaborates with local experts to address critical community needs, including combating homelessness, ending domestic violence, and supporting physical and mental health.

HomeFront is an independent organization established under the laws of the State of Montana. Board members for the Housing Authority are appointed by the Mayor for the City of Billings. [91.100\(c\)](#)

Housing Opportunities for Persons with AIDS: Public and private agencies have assisted the City in reviewing the Consolidated Plan. Local organizations providing housing, health services, and social services have been involved in planning processes for the homeless and chronically homeless. The City does not receive Housing Opportunities for Persons with AIDS (HOPWA) funding directly, but supports the Human Resources Development Council District 7 in their implementation of HOPWA goals and objectives. [91.100\(b\)](#)

Homeless Services: The Yellowstone County Continuum of Care (CoC) involves assessment, planning, and coordination to support homeless individuals who are high utilizers of local services. The CoC aims to reduce the burden on social and safety systems while saving money long-term. It values community collaboration and supports other coalitions.

Metropolitan Planning: The City of Billings - Community Development Division is included in the Planning and Community Services Department. The Department, overall, includes Code Enforcement, Planning / Transportation (includes the City of Billings and Yellowstone County), and the Building Division. These

Divisions work internally to implement the Growth Policy, Infill Policy, Transportation Plan and Neighborhood Plans collectively. All City-assisted projects are reviewed for residential access to public transportation and broadband infrastructure. [91.100\(a\)\(5\)](#)

Community Development Board: The [Community Development Board](#) is a citizen’s advisory board consisting of nine members who are appointed by the Mayor of Billings with the consent of the City Council. Six members are appointed to represent low-income neighborhoods of the City as defined by federal regulations for the CDBG program and three members represent the community at large. This board serves as an advisory group to the City Council for the purpose of providing citizens with input on policy decisions to the City Council.

The Community Development Board makes recommendations to the City Council regarding the Consolidated Plan, the Annual Action Plan, the Citizen Participation Plan, and the Comprehensive Annual Performance Evaluation Report. In addition, the Community Development Board reviews applications submitted for CDBG and HOME funding to make funding recommendations to the City Council for approval.

Local Government: The [Billings City Council](#) is the final governmental policy body that reviews and takes action on the Annual Action Plan, including the Citizen Participation Plan. The Community Development Board presents recommendations to the City Council during a scheduled work session preceding the public hearing each April to deliver information on decisions made regarding recommendations. After receipt and consideration of public comments, the City Council can approve the Consolidated Plan and Annual Action Plan and proposed funding allocations. Following approval, the Consolidated Plan and Annual Action Plans are forwarded to HUD.

Low-Income and Minority Households: To encourage citizen participation emphasizing the involvement of low-income and minority residents in areas where housing and community development funds may be spent, the City’s Community Development Board is comprised of six members representing lower income neighborhoods. The City’s Planning and Community Services Department also continues to coordinate meetings with the Combined Task Force Leadership Meetings, including those representing the City’s low-income areas with high concentrations of minorities.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless people (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Continuum of Care Funding: Funding is provided to the State of Montana and is distributed by the State to various regions in Montana through the Human Resource Development Councils (HRDCs). A Continuum of Care application is prepared on a statewide basis and the City plays a small role in this process through annual Certifications of Consistency with the Consolidated Plan. One or two organizations in Billings may receive Continuum of Care funding, but a very small percentage of the available statewide Continuum of Care funding is allocated to local projects: five to seven percent annually.

In the past, the Billings City Council has allocated \$210,000 to the Yellowstone County Continuum of Care for the FY23 low-barrier winter shelter for one year. The City Council also approved an allocation of \$76,700 to the Montana Rescue Mission to support data entry into the Coordinated Entry system in the Homeless Management Information System.

Billings Metro VISTA Project: To maintain momentum for City’s ten-year plan to impact homelessness, the City’s Community Development Division created an AmeriCorps Volunteers in Service to America (VISTA) program known as the *Billings Metro VISTA Project*; sponsored by the Corporation for National

and Community Service. VISTA members work to create or expand community-based programs, services, and systems that prevent and intervene in homelessness. VISTA members may be supervised by City staff for over-arching, community-wide benefit programs and they can also be supervised by nonprofit organization staff that are spearheading efforts to impact poverty and homelessness.

The City of Billings coordinates with the Montana Continuum of Care Coalition (MT CoC), a statewide network of homeless service providers that works collaboratively to identify needs, assess available resources, identify service gaps, and prioritize HUD funding to address homelessness throughout Montana. The MT CoC includes regional representatives from planning districts aligned with the Montana Department of Public Health and Human Services, along with at-large members. The coalition's Board of Directors oversees operations and ensures compliance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act.

Local Continuum of Care: The South-Central Montana Continuum of Care serves as the City's local Continuum of Care organization. It is a subsidiary of the MT CoC and represents Big Horn, Carbon, Stillwater, Sweet Grass, and Yellowstone counties. The South-Central Montana Continuum of Care collaboratively works to develop, support, and promote a continuum of resources, services, and housing opportunities that prevent homelessness and promote long-term stability.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate Emergency Solutions Grant (ESG) funds, develop performance standards and evaluate outcomes, and develop funding, policies, and procedures for the administration of Homeless Management Information System (HMIS).

In Billings, Montana, the allocation of Emergency Solutions Grant funds, development of performance standards, outcome evaluation, and administration of the Homeless Management Information System (HMIS) are coordinated through a collaborative partnership between the Montana Department of Public Health and Human Services (DPHHS) and the Montana Continuum of Care Coalition.

The City of Billings does not directly receive Emergency Solutions Grant funds as an entitlement; instead, these funds are distributed statewide by DPHHS through ten Human Resource Development Councils, with District 7 serving the Billings area. and families seeking housing assistance. The following agencies have participated in the local CoC's bi-weekly case conferencing meetings and many are utilizing the Homeless Management Information System (HMIS)* system:

- | | |
|---|--|
| Adult Resource Alliance Billings | Off The Streets * |
| Big Sky Senior Services | Rimrock Foundation, HOT Team * |
| Billings School District 2 | RiverStone Health * |
| Community Crisis Center * | Saint Vincent de Paul* |
| Downtown Billings Alliance* | South Central Mental Health Center PATH Team * |
| Family Promise of Yellowstone Valley | STEP, Inc. |
| Family Service of Billings* | The Salvation Army * |
| First Congregational Church | Tumbleweed * |
| Gratitude in Action * | Veterans Administration |
| HomeFront * | Veterans Inc.* |
| HRDC District 7 * | Volunteers of America* |
| Intermountain Health Care Manager Team | Yellowstone Boys and Girls Ranch |
| Montana Legal Services | YWCA Billings |
| Native American Development Corporation | |

The Montana Continuum of Care Board is responsible for governing and operating HMIS, with an Oversight Committee established as per the Montana Continuum of Care bylaws. This structure ensures that policies and procedures for HMIS administration are developed collaboratively, incorporating input from various stakeholders, including DPHHS. DPHHS actively participates in HMIS developments, providing training and engaging in regular data quality assessments. This involvement ensures that the HMIS operates efficiently and effectively, supporting the broader goals of the Emergency Solutions Grant program.

DPHHS collaborates closely with the Montana Continuum of Care to determine the allocation of Emergency Solutions Grant funds across the state. This partnership involves regular monthly meetings where strategies are aligned to address homelessness effectively. A formal agreement between DPHHS and the Montana Continuum of Care outlines mutual guidance for the utilization of Emergency Solutions Grant funds in Montana. This agreement ensures that both entities work cohesively in planning and performance evaluation of Emergency Solutions Grant projects.

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Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities.

#	Agency/Group/Organization*	Type(s)	Consolidated Plan Section(s)	How Consulted / Outcomes
1	HomeFront, local public housing authority	Public Housing Authority; Housing; Services - Homeless	Housing Need Assessment; Public Housing Needs; Homeless Needs - Chronically Homeless, Families with Children, Veterans; Homelessness Strategy; Market Analysis; Anti-Poverty Strategy	Email / phone / web retrieval; data exchange for the development of relevant sections
2	Homeward	Housing	Housing Need Assessment; Market Analysis; Anti-Poverty Strategy	
3	Mental Health Center	Housing; Services - Persons with Disabilities	Housing Need Assessment; Non-Homeless Special Needs; Anti-Poverty Strategy	
4	Family Service, Inc.	Services - Housing	Housing Need Assessment; Market Analysis; Homeless Needs - Families with Children; Homelessness Strategy; Anti-Poverty Strategy	
5	District 7 HRDC	Housing; Services - Housing, Children, Persons with HIV/AIDs, Homeless	Housing Need Assessment; Homeless Needs - Chronically Homeless, Families with Children; Homelessness Strategy; HOPWA Strategy; Anti-Poverty Strategy	
6	YWCA Billings	Housing; Services - Domestic Violence, Children	Housing Needs Assessment; Market Analysis; Homeless Needs - Families with Children; Anti-Poverty Strategy	
7	Montana Continuum of Care	Housing; Services - Domestic Violence, Children	Housing Need Assessment; Homeless Needs - Chronically Homeless, Families with Children; Homelessness Strategy; HOPWA Strategy; Anti-Poverty Strategy	
8	NeighborWorks Montana	Housing	Housing Need Assessment; Market Analysis; Anti-Poverty Strategy	
9	Yellowstone County Continuum of Care	Housing; Services - Domestic Violence, Children	Housing Need Assessment; Homeless Needs - Chronically Homeless, Families with Children; Homelessness Strategy; HOPWA Strategy; Anti-Poverty Strategy	
10	RiverStone Health	Health Agency; Services - Homeless	Non-Homeless Special Needs; Homeless Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	

***The first ten agencies / organizations are listed in the main part of the Consolidated Plan. Dozens of additional agencies / organizations were consulted and participated in the Consolidated Planning process – as noted and included in the Appendices. They are omitted because they must be re-entered each year with the Annual Action Plan.**

HUD Table 2 – Participating Agencies, Groups, and Organizations

Identify any Agency Types not consulted and provide rationale for not consulting.

The City of Billings staff is not aware of any agency types that have not been consulted in preparation of the Consolidated Plan. City staff contacted many agencies to assist with the development of the Consolidated Plan and have widely circulated information relative to proposed programs and funding allocations to garner feedback. Additional efforts were made during the public comment period to distribute the Consolidated Plan for review and feedback.

Other local/regional/state/federal planning efforts considered when preparing the Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Montana State Continuum of Care	Identifies Federal and State resources to impact homelessness.
Growth Policy	City of Billings - Planning Division	Promotes affordable housing and infill development.
Infill Policy	City of Billings - Planning Division	Promotes affordable housing and infill development.
Annexation Policy	City of Billings - Planning Division	Promotes infill development.
Transportation Plan	City of Billings - Planning Division	Improves transit impacting project affordability
Neighborhood Plans	City of Billings - Planning Division and Neighborhood Task Forces	Guides development efforts in each neighborhood.
Consolidated Plan	Montana Department of Commerce - Community Development	State CDBG and HOME resources may be available to further projects. Consultation and coordination of statewide Analysis of Impediments to Fair Housing Choice.

Table 3 – Other Local, Regional, and Federal Planning Efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan [91.215\(l\)](#)

The City of Billings - Community Development Division is included in the Planning and Community Services Department. The Department, overall, includes Code Enforcement, Planning / Transportation (includes the City of Billings and Yellowstone County), and the Building Division. These Divisions work internally to implement the Growth Policy, Annexation Policy, Infill Policy, Transportation Plan and Neighborhood Plans collectively. All projects are reviewed for residential access to public transportation.

AP-12 Participation

[91.105, 91.200\(c\)](#)

Summary of citizen participation process/Efforts made to broaden citizen participation. Summarize citizen participation process and how it impacted goal setting.

Public comments are requested at least 30 days prior to submission of reports required under HUD’s Consolidated Plan process. City staff has considered all written comments by citizens, public agencies, and other interested parties prior to submission of its final Consolidated Plan and related reports to HUD and attach a summary of each comment to the final submission. If written comments were not accepted for inclusion in the Plan, City staff have provided written explanation of why those comments were not accepted. Staff utilizes data-driven analysis processes along with citizen and community participation to establish goals, strategies, and funded activities.

Citizen Participation Outreach

#	Mode of Outreach	Target of Outreach	Summary of response/attendance
Summary of comments not accepted and reasons: No comments were rejected.			
1	Public Notices	Nonprofit and other organizations with an interest in CDBG and/or HOME funding opportunities, Broad Community	Public Notices to obtain public comments on: performance 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. The notices were published through the Yellowstone County News on September 5, 12, and 19, 2025 .
	Please reference the appendices for public comments.		
2	Public Hearing / Public Meeting	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents	Public Hearing on September 22, 2025 , to obtain public comments on performance for the prior program year; 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. City Council meetings are streamed live and the videos are available on demand at www.comm7tv.com and www.facebook.com/comm7tv .
	Please reference the appendices for public comments.		
3	Email Notification	Nonprofit organizations with an interest in AmeriCorps VISTA funding opportunities, Broad Community	Email notification regarding the availability of AmeriCorps VISTA resources on December 12, 2025 .
	The City received numerous proposals for AmeriCorps VISTA placements for projects designed to impact poverty.		
4	Public Notices	Nonprofit organizations with an interest in AmeriCorps VISTA funding opportunities	Public Notices regarding the availability of AmeriCorps VISTA resources were published through the Yellowstone County News on December 12, 19, 26, 2025 and January 2 and 9, 2026 .
	The City received numerous proposals for AmeriCorps VISTA placements for projects designed to impact poverty.		
5	Public Notices	Nonprofit and other organizations with an interest in CDBG and/or HOME funding opportunities, Broad Community	Public Notices regarding the availability of CDBG and HOME funding and application process were published through the Yellowstone County News on December 19 and 26, 2025, and January 2, 2026 .
	Not applicable.		
6	Public Notices / Public Hearing	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens Nonprofit organizations with an interest in AmeriCorps VISTA funding opportunities	Public notices were published through the Yellowstone County News on December 19 and 26, 2025, and January 2, 2026 . A public hearing was held on February 3, 2026 , at the Community Development Board meeting to garner public comment on community need and for organizations interested in funding to present information on applications submitted.
	Public comments are included in the Appendices.		
7	Website	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens	The drafted Annual Action Plan was available online from March 14 through April 13, 2026 , for public comment. Emails were also sent to Billings area nonprofit, healthcare, and housing organizations.
	Not applicable.		
8	Public Notices / Comment Period / Hearing	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents	Public notices were published in the Yellowstone County News on March 13, 20, and 27, 2026 regarding: - Availability of the drafted Annual Action Plan for public comments from March 14 through April 13, 2026 ; and - City Council public hearing to be held on April 13, 2026 .
	No responses or comments were received.		

Citizen Participation Outreach			
#	Mode of Outreach	Target of Outreach	Summary of response/attendance
Summary of comments not accepted and reasons: No comments were rejected.			
9	Website	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents	The drafted Annual Action Plan was available online, from March 14 through April 13, 2026, for public comment and feedback. Emails were also sent to local nonprofit, healthcare, and housing organizations on December 15, 2025.
	No responses or comments were received.		
10	Public Meetings	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents	Monthly Community Development Board meetings are open to the public. Meetings are held on the first Tuesday of each month and are advertised.
	Public comments are included in the Appendices.		
11	Email Notification	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens	Emails to nine neighborhood task forces, predominantly located in low-income area neighborhoods, were sent offering a presentation from City staff members and the Community Development Board regarding the City's proposed activities for CDBG and HOME funding on February 20, 2026 .
	Two task forces scheduled presentations and staff met with one task force leader who requested short newsletter stories.		
12	Public Meeting	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens	City staff and Community Development Board members made a presentation to the South Side Task Force on March 19, 2026 .
	Public comments are included in the Appendices.		
13	Public Meeting	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens	City staff and Community Development Board members made a presentation to the Billings Heights Task Force on March 24, 2026 .
	Public comments are included in the Appendices.		
14	Public Hearing / Public Meeting	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents	The City Council public hearing held April 13, 2026 , was streamed live. The videos are available on demand at www.comm7tv.com and www.facebook.com/comm7tv .
	See the appendix for a summary of responses.		

Table 2 – Citizen Participation Outreach

Section III: Annual Action Plan

AP-15 Expected Resources

91.220(c)(1,2)

Introduction

The table below illustrates the CDBG and HOME resources expected for the program year. CDBG administration allocations are capped at 20% of the new CDBG allocation in addition to eligible program income received during the project year. Maximum amounts for public service activities are capped at 15% of the new CDBG allocation and 15% of the previous year’s program income. HOME administration activities are capped at 10% of the new HOME allocation and eligible program income received following the required affordability period. Revenue received during a project’s affordability period is considered recaptured and may not be used for administration.

Expected revenues from the CDBG program include repayments for funding loaned through the Housing Rehabilitation program, First Time Home Buyer program, and other revitalization efforts. The City expects to receive approximately \$50,000 to \$300,000+ in repayments for the upcoming fiscal year and this funding will be reprogrammed for programs identified herein and in the Consolidated Plan. The City will not receive proceeds for Section 108 loan guarantees, surplus funds from urban renewal settlements, or float-funded activities.

Revenue expected for the HOME program includes recaptured and program income funding generated by the First Time Homebuyer Loan program. The City expects to receive approximately \$50,000 to \$300,000+ in HOME funding through these venues, and the funding will be utilized to further programs identified in this Plan. City of Billings programs utilize 100% of CDBG and HOME funding to benefit low- to moderate-income households and/or areas. The City may also receive program income attributable to the Neighborhood Stabilization Program and other previously funded federal and state programs.

Routine revenues including program income, recaptured / repaid funds, and re-programmed monies will be utilized for existing and previously approved programs as it is received during each fiscal year. Routine revenues are allocated on a close- and shovel-ready basis to ensure timely commitment and expenditure. These changes are customary and facilitate funding allocations to projects and activities most in demand and do not require a substantial or minor amendment to the Consolidated Plan, as per the City’s Citizen Participation Plan.

Anticipated Resources

Program	Source of Funds	Expected Amount Available Year Two				Expected Amount Available Remainder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Years EN Resources	Total		
CDBG	Public / Federal	\$650,000	\$# Prior Year \$### Current Year \$100,000 FY26-27	\$#	\$#	\$#*	Entitlement Allocation
	Uses of Funds: Administration, Housing, Public Improvements / Services						
HOME	Public / Federal	\$300,000	\$# Prior Year \$# Current Year \$100,000 FY26-27	\$#	\$#	\$#*	Entitlement Allocation
	Uses of Funds: Administration, Homebuyer Acquisition, New Housing Development						

Table 3 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state, and local funds), including a description of how matching requirements will be satisfied.

The HOME Program requires a 25% non-federal match for project funding. The City of Billings meets this requirement through low-interest financing available for First-Time Homebuyer Loans issued through the Montana Board of Housing (MBOH), as well as through matching contributions for other HOME-assisted affordable housing projects, including private contributions and local bank financing.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

The City of Billings does not have plans to use publicly owned land to address needs identified in the Consolidated Plan and is not required to do so, as per federal regulation.

Requirements set forth in CFR 24 91.220 and 91.520 indicate the City *may indicate* publicly owned land or property located within the jurisdiction that *may be used* to address the needs identified in the Consolidated / Annual Action Plan.

While the City has not dedicated land to the Community Development Division, the Billings City Council supported the Division's housing programs by dedicating nearly \$450,000 in non-federal funds to support Consolidated Plan activities.

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#	Goal Name	Category & Needs Addressed	Outcome	Objective	\$	City Program / Activities	Goal Outcome Indicator	One-Year Goal
1	Create, preserve, and expand affordable housing options	Affordable Housing	Affordability	Decent Affordable Housing	CDBG # HOME # NSP TBD	Affordable Housing Development	7 - Rental Units Constructed	32 Rentals: Mitchell Court 6 HOME Housing Units
						First Time Home Buyer	11 - Direct Financial Assistance to Homebuyers	10 Housing Units
						Foreclosure Acquisition / Rehabilitation	10 - Homeowner housing rehabilitated	1 Households Assisted
						<p>Goal: Create, preserve, and expand decent, affordable housing options for low-income residents citywide. Community Development aims to enhance and broaden housing access, availability, physical quality, economic value, and longevity across the city for Billings' low-income residents including seniors, individuals with disabilities, minority groups, and other special populations.</p> <p>Strategy: Increase affordable housing opportunities by implementing financing initiatives, including housing development loans to drive construction and rehabilitation, first-time homebuyer loans to support sustainable ownership, and home repair financing to preserve and upgrade existing low-income neighborhood homes.</p> <ul style="list-style-type: none"> • Affordable Housing Development: Promote citywide development of affordable single-family, multi-family, and special needs housing by offering loan financing to private developers and nonprofit organizations for new construction, rehabilitation, and infrastructure improvements. • First Time Home Buyer: Offer accessible loan financing to foster first-time homeownership opportunities that support long-term financial stability, build generational wealth, and stabilize neighborhoods. • Home Repair: Offer loan financing to agencies that assist low-income homeowners in completing essential repairs - such as major systems upgrades, weatherization, energy/water efficiency, and lead water service line replacements - to enhance and preserve the quality of Billings' affordable housing stock. • Foreclosure: Mitigate the adverse effects of vacant, foreclosed properties by acquiring, rehabilitating, and selling these homes to low-income households - thereby combating urban decay, reducing crime, stabilizing property values, and stimulating the local economy. 		

#	Goal Name	Category & Needs Addressed	Outcome	Objective	\$	City Program / Activities	Goal Outcome Indicator	One-Year Goal
2	Services for vulnerable populations	Services for vulnerable populations	Availability / Accessibility	Create Suitable Living Environment	CDBG # CNCS TBD	Billings Metro VISTA Project	3 - Public service activity other than low-income benefit	50 People
						Public Facilities	1 - Public facility / infrastructure for other than low-income housing benefit	0 Facilities 0 Persons this year
<p>Goal: Ensure that vulnerable populations have reliable access to comprehensive supportive services that enhance stability, self-sufficiency, and overall well-being.</p> <p>Strategy: Provide resources to nonprofit organizations to address poverty and provide supportive services to low-income individuals and families to provide stable housing, promote self-sufficiency, and promote overall well-being:</p> <ul style="list-style-type: none"> • Public Facilities: Provide financing to develop public facilities to serve as accessible, community-based hubs where individuals and families facing economic, social, or health-related challenges can find help. • Billings Metro VISTA Project: Allocate AmeriCorps resources to nonprofit organizations to undertake poverty impact activities and to support the low-income individuals and families they serve. Federal AmeriCorps Volunteers in Service to America (VISTA) focus areas include education, healthcare, food security, economic opportunity, housing, financial literacy, and others. • HOME-ARP: Provide grant funding to nonprofit organizations delivering supportive services to prevent homelessness; unhoused individuals and families; those at-risk of becoming unhoused; and people fleeing domestic violence / trafficking. Federal service categories include case management, housing counseling, rent/utilities/deposit assistance, mental health, healthcare, substance misuse treatment, job training, employment, financial literacy, assistance with benefits enrollment, childcare, and transportation. 								
3	Neighborhood Revitalization	Neighborhood Revitalization	Availability / Accessibility	Create Suitable Living Environment	CDBG ###	CPTED Public Facilities	1 - Public facility / infrastructure for other than low-income housing benefit	1 Facility 150 Persons
						<p>Goal: Foster suitable living environment and quality of life through the improvement of physical conditions in lower-income neighborhoods.</p> <p>Strategy: Integrate environmental design, infrastructure improvements, and public safety measures to revitalize neighborhoods, prevent crime, and enhance quality of life for residents.</p> <ul style="list-style-type: none"> • Crime Prevention Through Environmental Design: Reduce crime by making infrastructure improvements in low-income neighborhoods (parks, adding streetlights, etc.) while: creating more attractive and secure environments; stimulating local investment; encouraging residents to use public spaces more freely; and improve quality of life for low-income residents. 		
		HOME Investment Partnerships Program (HOME)			Community Development Block Grant (CDBG)		Corporation for National and Community Service (CNCS)	

Table 6 – Goals Summary (added in AP-21 in IDIS)

Introduction

The City of Billings is recommending the following projects for CDBG and HOME funding for FY2026-2027. The City will be receiving an estimated \$650,000 in new CDBG funds and \$300,000 in new HOME funds. Prior awards for CDBG and HOME entitlement funds and repayment revenue received and anticipated for receipt are identified in the chart below. CDBG programs will be funded with estimated entitlement and program income funding as follows:

- **Administration at maximum caps, 20% of CDBG (estimated \$130,000) and 10% of HOME (estimated \$30,000). Community Housing Development Organization** set-aside will be allocated 15% of new HOME funding, as required by HUD (estimated \$45,000).
- **Affordable Housing Development at \$750,000 for the Sage Tower renovation project** in addition to an estimated \$87,619 to cover City staff costs to manage and monitor the project.
- **The First Time Home Buyer program would be allocated an estimated \$559,965 in CDBG and HOME funding.** This includes at least \$200,000 in CDBG funding in addition to \$25,000 in CDBG repayment funding, if received. An estimated \$234,965 in HOME and \$100,000 in HOME repayment funding would also be allocated, if received.
- **Billings Metro VISTA Project would be allocated an estimated \$25,000 in repayment revenue, if received during next fiscal year.** Rollover funding, in addition to a small amount of repayment revenue, should be sufficient for the next fiscal year.
- **An estimated \$320,000 would be allocated to the Foreclosure Acquisition / Rehabilitation program.** This funding would assist the city in purchasing a foreclosed home to renovate and sell to a low-income household. This program is the City’s most effective tool in managing timely expenditure and is highly rated by participants.
- **An estimated \$50,000 in CDBG repayment funding would be allocated to make improvements in low-income neighborhood parks utilizing Crime Prevention Through Environmental Design concepts.** Public safety is a high priority for the City Council. If the City receives less CDBG funding from HUD than anticipated, this allocation would be lowered to accommodate.

CDBG and HOME funding allocations are subject to the City’s standard close- and shovel-ready allocation process, including the addition of repayment revenues to any project/activity identified in the City’s Consolidated / Annual Action Plan, as per the City’s Citizen Participation Plan. The amounts below represent budget authorizations from past years as well as the Annual Action Plan’s program year.

FY2026-2027 ESTIMATED Allocations

#	Project Name	CDBG				HOME				TOTALS
		EN	Prior EN	Prior PI	Est PI	EN	Prior EN	Prior PI	Est PI	
1 & 2	Administration	130,000	-	-	-	30,000	-	-	-	160,000
3	Community Housing Dev Orgs Set-Aside	-	-	-	-	45,000	159,712	-	-	204,712
	Affordable Housing Development: Sage Tower	0	440,271	397,348	-	0	0	-	-	837,619
4	First Time Home Buyer	200,000	-	-	~25,000	225,000	-	9,965	~100,000	559,965
5	Billings Metro VISTA Project	0	-	-	~25,000	-	-	-	-	25,000
6	Foreclosure Acquisition / Rehabilitation	320,000	-	-	0	-	-	-	-	320,000
7	Crime Prevention through Environmental Design	0	-	-	~50,000	-	-	-	-	50,000
TOTALS		650,000	440,271	397,348	~100,000	300,000	159,712	9,965	~100,000	2,157,296

Table 7 – Projects and Allocations (including estimated future program income).

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The allocation priorities were established by identifying community needs through Needs Assessment and Market Analysis:

- **Affordable Housing:** Single- and multi-housing development, First Time Home Buyer, and Foreclosure Acquisition and Rehabilitation.
- **Poverty Impact:** Billings Metro VISTA Project and Crime Prevention Through Environmental Design.

Limited funding is the primary obstacle faced by the City in undertaking the activities described in its Consolidated Plan and meeting underserved needs. The Needs Assessment identified the affordable housing needs and conditions of our community. These conditions, particularly the cost burden faced by very low-income renters and homeowners, are difficult to address given existing resources.

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#	Project Name	Target Area	Goals / Needs	Funding	Target Date	Estimate # / Type Families Benefitting
1 & 2	Administration	City of Billings	Affordable Housing	CDBG \$# HOME \$#	June 30, 2027	Not Applicable
		General grant administration for CDBG and HOME programs.				
3	Foreclosure Acquisition & Rehabilitation	City of Billings	Affordable Housing	CDBG \$#	June 30, 2027	1 or 2 Housing Units – Low-Income Household(s) (IDIS Category 10)
		<p>Description: Revitalize low-income neighborhoods through foreclosure remediation, redevelopment, and infill development.</p> <p>Planned Activities: Funding to support the purchase of vacant and foreclosed properties for the purpose of rehabilitation and direct homeownership assistance to income-qualified homebuyers as their primary residence. Properties may also be demolished to make way for new construction of affordable housing. The purpose of the program is to stabilize neighborhoods, stem the decline of house values of neighboring homes due to foreclosure, and to preserve decent affordable housing.</p>				
4	Affordable Housing Development	City of Billings	Affordable Housing	CDBG \$# HOME CHDO: \$# HOME EN: \$#	June 30, 2027	4 Household Housing Units - Low-Income Household, Rental Units Constructed (IDIS Category 7)
		<p>Description: Encourage the citywide development of new affordable single-family, multi-family and special needs housing in the community via offering financing through the Affordable Housing Development program to private developers and nonprofit organizations.</p> <p>Planned Activities: CDBG, HOME, and HOME CHDO funding would be utilized to facilitate the development of new affordable housing.</p>				
5	First Time Home Buyer	City of Billings	Affordable Housing	HOME \$# Utilizing Rollover Funding from Last Fiscal Year \$#	June 30, 2027	20 Low-Income Households Assisted (IDIS Category 11)
		<p>Description: Provide affordable financing and support to promote homeownership opportunities citywide.</p> <p>Planned Activities: This program provides financial resources to support low-income first-time homebuyers with down payment and closing costs.</p>				
6	Billings Metro VISTA Project	City of Billings	Poverty Impact	CDBG \$#	June 30, 2027	200 Low-Income Persons Assisted (IDIS Category 3)
		<p>Description: Provide public service activity funding to support the Billings Metro VISTA Project to help local nonprofit organizations expand services for the homeless and special needs populations: Healthcare; Food Security; Education; Employment; Financial Literacy; and Housing.</p> <p>Planned Activities: AmeriCorps members work on poverty impact issues in the community including hunger, homelessness, education, and veterans / military family support. Members are placed at nonprofit organization Host Sites and the City to assist in strengthening services in the poverty-impact service continuum.</p>				
7	Crime Prevention through Environmental Design	City of Billings	Crime Prevention	CDBG \$#	June 30, 2027	1 Public Facility 50 Persons Assisted (IDIS Category #1 & 23)
		<p>Description: Provide funding to support Crime Prevention through Environmental Design for improvements to low-income neighborhood parks.</p> <p>Number and Family Type: One public facility located in a lower-income neighborhood. The number and type of families will be determined through Census block groups adjacent to parklands identified as higher-crime locations.</p> <p>Planned Activities: This program is designed to add park amenities to reduce crime in low-income neighborhoods including, lighting, design, landscaping, social engagement, etc.</p>				

Community Development Block Grant (CDBG) HOME Investment Partnerships Program (HOME)

Table 8 - Projects Summary Information

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The geographic area served by the Consolidated and Annual Action Plans is defined by the current City of Billings limits. 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 Billings city limits.
- Citywide strategies encourage the distribution of resources to support affirmatively furthering fair housing and equal opportunity to avoid segregation in Billings.
- Geographic distribution of investments description 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 actual dollar amount planned for allocation to each program is included in this Action Plan.

The City will focus distribution of investments on a citywide basis to support diversity and mixed-income development across the community. 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 plans to dedicate zero percent of funding to target areas in favor of supporting a citywide approach to further fair housing, equal opportunity, and anti-segregation efforts.**

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100%

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The strategies identified in the Consolidated and Annual Action Plans will be addressed on a citywide basis to encourage the distribution of low-income affordable housing and other assistance to lower-income households throughout the community.

Introduction

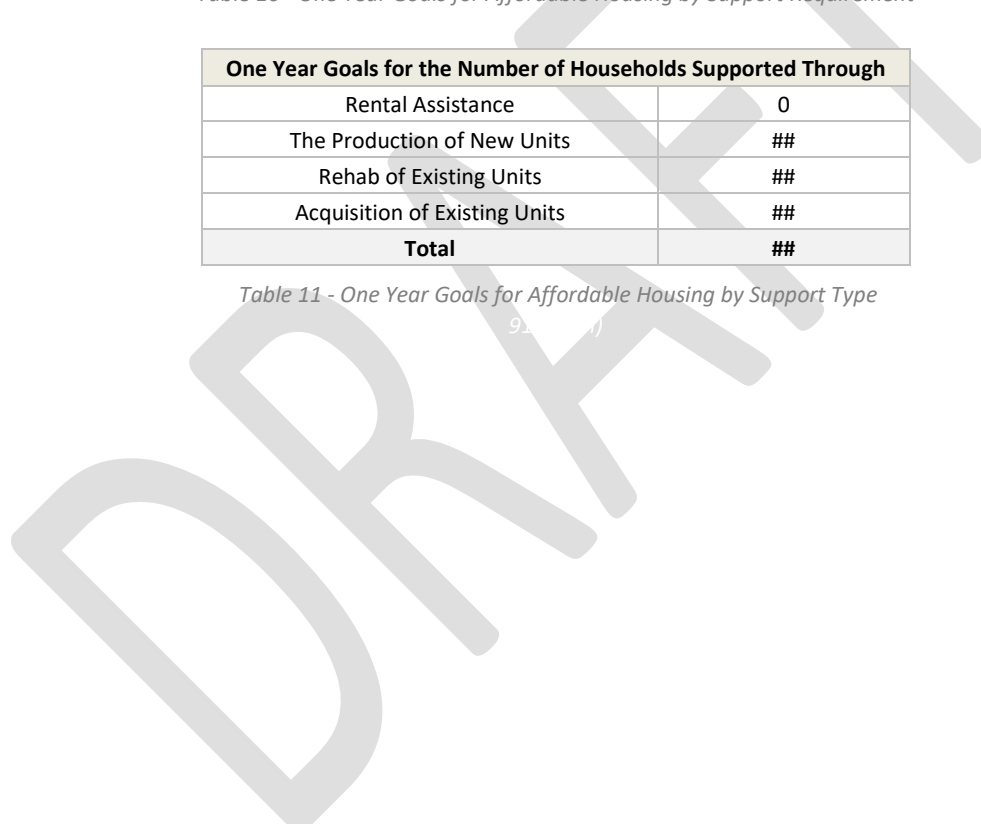
Planned affordable housing activities for the upcoming year include Foreclosure Acquisition / Rehabilitation, Affordable Housing Development, and First Time Home Buyer. While many of these programs may serve the homeless or special needs households, the programs are not designed to exclusively serve one or more of the following cohorts.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	##
Special-Needs	0
Total	##

Table 10 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	##
Rehab of Existing Units	##
Acquisition of Existing Units	##
Total	##

Table 11 - One Year Goals for Affordable Housing by Support Type



Introduction

HomeFront serves extremely low-income, very low-income, and low-income citizens. HomeFront plans to apply for all grants that will assist the organization in adding units to its existing programs and any programs that complement existing services and are able to be implemented. HomeFront will continue to assess and implement modernization funds to upgrade and restore units and complete energy efficient repairs as needed.

Actions planned during the next year to address the needs of public housing

HomeFront may apply for funding to develop affordable housing through the Affordable Housing Development Program. In the past, the City granted funds to build new units through the HOME and CDBG programs in neighborhoods where Housing Authority property exists. The City has also provided funding for a variety of rehabilitation and new construction projects to neighborhoods that have public housing units in need of upgrading.

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 Housing Authority complexes have been built. The City has provided funding for parks and play areas for the neighborhoods where Housing Authority families reside. In addition, the businesses that have moved into areas where Housing Authority properties are located have contributed to the economic stability of HomeFront clients. The City's First Time Home Buyer program assists with home ownership down payment assistance and home ownership counseling for clients considering homeownership. The City coordinates with HomeFront for housing needs assessments, assists in funding new projects when appropriate, and assists with applications for supportive services when called upon for assistance.

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

HomeFront implements the Family Self-Sufficiency program. This program links participants to community agencies to help them become self-sufficient through individual goal setting. Forty-one households have achieved homeownership through this program to date. 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. Additional information is included in the five-year plan on file at the HomeFront office.

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 Administration's daily communications with the Housing Authority'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.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable. HomeFront is a [standard performer](#) as per the Public Housing Assessment System (HAS) and, therefore, a review of troubled status needs is not required.

Introduction

As previously stated in the SP-60 Homelessness Strategy of the [Consolidated Plan](#), the Community Development Division's ongoing activities, to the greatest extent possible:

- Continuing to provide supportive services funding to nonprofit organizations through the HOME-ARP program, specific to qualified populations. Funding allows subrecipients to provide supportive services and financial assistance to low-income households and individuals at risk of homelessness. These services help households regain stability and permanent housing.
- Staff will continue to provide local nonprofit organizations access to AmeriCorps VISTA members through the **Billings Metro VISTA Project** resources. VISTA members may be placed at the City to undertake objective citywide initiatives. VISTA members may also be placed at nonprofit Host Site organizations to work on specific anti-poverty initiatives.

The City of Billings does not directly receive Continuum of Care, Emergency Shelter Grant, or other federal funds to exclusively support efforts to impact homelessness. At present, Community Development staff do not provide direct services to those experiencing homelessness.

A network of over 50 local service providers in the community strive to meet the diverse needs of those experiencing homelessness, those who are at-risk of homelessness, and people experiencing poverty. A complete listing of services, including outreach, is included in the MA-30 Homeless Facilities and Services section of this Consolidated Plan.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless people (especially unsheltered people) 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. City staff does not provide direct services to those experiencing homelessness.

A network of over 50 local service providers in the community strive to meet the diverse needs of those experiencing homelessness, those who are at-risk of homelessness, and people experiencing poverty. The Mental Health Center manages a 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

The shelter needs for those experiencing homelessness in the Billings community are primarily met by the Montana Rescue Mission (MRM). The organization operates a men's shelter and a shelter to serve women and their children. The City of Billings recently offered a one-year grant to the MRM to implement the Homeless Management Information System (HMIS) and Coordinated Entry System. Several local service providers assist homeless families by providing funding for rent, mortgage, utility, and deposit assistance.

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. Additional services for the homeless are included in the MA-30 Homeless Facilities and Services section of the Consolidated Plan (www.BillingsMT.gov/ConPlan). The YWCA recently opened an emergency shelter for the same population.

For those living on the downtown streets of Billings, a position was created for an addiction / mental health counselor to accompany two downtown police officers when engaging people living on the streets. This initiative was undertaken as one of the many outcomes from the Community Innovations Summit, which was facilitated by the Community Development Division and the Downtown Billings Alliance. Non-federal funding through the City of Billings has been allocated to support the counselor staff position.

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.

City staff administer and monitor funding for subrecipients of the HOME-ARP program. Three subrecipients have received funding in Billings and details of each subrecipient are listed below:

- **Alternatives, Inc.:** Alternatives, Inc. provides financial assistance for housing including rental application fees, security deposits, utility deposits, utility payments and moving costs. The organization assists with rental arrears up to 24 months and substance abuse treatment. This array of services plays an integral role in empowering individuals to prevent homelessness.
- **District 7 Human Resources Development Council (HRDC):** HRDC District 7 provides financial assistance for housing including rental application fees, security deposits, utility deposits, utility payments, moving costs and rental arrears up to 24 months. Case management through the organization allows for personalized education and support to prevent recurring homelessness. In addition to HOME-ARP funding, HRDC District 7 receives Emergency Shelter Grant funds and manages a rapid rehousing program to help families quickly regain stability into permanent housing.
- **Native American Development Corporation (NADC):** NADC provides supportive services including credit repair services, employment assistance, job training and transportation services. The organization also administers substance abuse treatment and mental health services. Direct case management provides ongoing support for low-income households and those at risk of homelessness.

In addition to organizations supported by the HOME-ARP program, various other organizations provide housing and assistance solutions:

- **Montana Rescue Mission:** Operates a 150-bed emergency shelter, 150 bed long-term shelter, 29 affordable housing apartments, mental health clinic, addiction recovery clinic, medical clinic, childcare center, community meals, and chaplaincy/spiritual care. Services are available for men, women, children and families.
- **YWCA's Northern Lights:** Provides housing for survivors of domestic violence. Additional services provided include case management, mental health treatment, budgeting assistance, and the facilitation of access to benefits. The organization also provides transitional housing and permanent

supportive housing.

- **Community Crisis Center:** Provides crisis intervention and 23 hour stays as a technique to impact chronic homelessness.
- **Family Promise of Yellowstone County:** Provides emergency shelter to several families at a time in a network of church congregations. The organization also operates a transitional housing program that provides apartments for those who have graduated from the shelter program.

Several local service providers assist homeless families by providing funding for rent, mortgage, utility, and deposit assistance. Additional services for the homeless are included in the MA-30 Homeless Facilities and Services section of this Consolidated Plan.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The City does not receive McKinney-Vento Homeless Assistance Act funds and is not required to develop and implement a Discharge Coordination Policy. The Montana Continuum of Care (MT CoC) for the Homeless Coalition is the state's lead agency for addressing homeless activities and is a statewide collaboration of diverse homeless service providers, nonprofit organizations, and local and state governments. The coalition was formed to address homelessness with very few resources to cover Montana's vast geographical area. The system is established upon community and regionally-based continuum of care systems, which form the statewide coalition and continuum of care process. The City supports the MT CoC in their efforts to establish a Statewide Discharge Coordination Policy.

The City does not receive Emergency Shelter Grant funds. These funds are distributed statewide by the Montana Department of Public Health and Human Services through ten HRDCs throughout the state. The local District 7 HRDC utilizes these funds to support rapid re-housing activities in conjunction with the local shelters.

Introduction

Barriers to affordable housing are noted in the MA-40 and SP-55 Barriers to Affordable Housing sections of the Consolidated Plan, which can be found online at www.BillingsMT.gov/ConPlan.

Additional barriers have been identified in the City's Analysis of Impediments to Fair Housing Choice, including:

- Concentrations of minorities that would not exist in a free market not distorted by discrimination suggest that Billings has a dual housing market; one for non-Hispanics, Whites and Asians and another for all other minorities.
- Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing.
- Discrimination against Latinos in issuing government-backed mortgage and refinancing loans continues unabated in Billings as it does throughout the nation.
- The relatively high cost of housing continues to pose a barrier to fair housing choice in Billings.
- A review of Unified Zoning Regulations and review requirements was needed to foster compliance with fair housing law and to promote inclusionary zoning. [Project Re:Code](#) was completed in 2021.
- There is a serious shortage of housing affordable for Housing Choice Vouchers in the areas where the proportion of public-school students from low-income neighborhoods is relatively low.

Actions it planned 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.

The City plans on assisting with housing affordability for renters / owners; cost of development; difficulty in paying for needed repairs; manufactured housing developments; and tax structure by implementing the following programs:

- Affordable Housing Development
- First Time Home Buyer
- Foreclosure Acquisition / Rehabilitation

While City staff does not have the capacity to manage a home repair program, local nonprofit agencies are welcome to apply for CDBG funding to manage a housing rehabilitation loan program through the City's routine allocation process.

Relative to the barriers identified in the City's Analysis of Impediments to Fair Housing Choice, the City plans on the following activities:

- Produce and disseminate consumer education on Fair Housing issues through ongoing publicity campaigns to make people aware they can move anywhere in the area they can afford.
- Work to expand housing choices of existing and potential new residents beyond neighborhoods identified by their own race or ethnicity.
- Continue to partner with enforcement agencies providing testing of the real estate industry

practitioners to identify discriminatory practices in rental and for-sale housing.

- Support the efforts of local housing counseling agencies, especially Latinos, before they apply for a mortgage.
- Continue to provide brochures containing information apprising potential home buyers of the availability of housing counseling and how to spot / report discriminatory lending practices.
- Continue to work toward the provision of affordable housing through Community Development programs.
- Support the Housing Authority's efforts to expand the geographic range where holders of Housing Choice Vouchers look for housing.

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Introduction

The City's programs have been designed to meet priority needs in the community. However, there is very limited funding coming through the City to meet the needs of local citizens.

Actions planned to address obstacles to meeting underserved needs

Goal: Ensure that vulnerable populations have reliable access to comprehensive supportive services that enhance stability, self-sufficiency, and overall well-being.

Strategy: Provide resources to nonprofit organizations to address poverty and provide supportive services to low-income individuals and families to provide stable housing, promote self-sufficiency, and promote overall well-being:

Key Initiatives

- **Public Facilities:** Provide financing to develop public facilities to serve as accessible, community-based hubs where individuals and families facing economic, social, or health-related challenges can find help.
- **Billings Metro VISTA Project:** Allocate AmeriCorps resources to nonprofit organizations to undertake poverty impact activities and to support the low-income individuals and families they serve. Federal AmeriCorps Volunteers in Service to America (VISTA) focus areas include: education, healthcare, food security, economic opportunity, housing, financial literacy, and others.
- **HOME-ARP:** Provide grant funding to nonprofit organizations delivering supportive services to: prevent homelessness; the unhoused; those at-risk of becoming unhoused; and people fleeing domestic violence/trafficking. Federal service categories include case management, housing counseling, rent/utilities/deposit assistance, mental/healthcare, substance misuse treatment, job training, employment, financial literacy, benefits enrollment, childcare, and transportation.

Actions planned to foster and maintain affordable housing.

Goal: Create, preserve, and expand decent, affordable housing options for low-income residents citywide. Community Development aims to enhance and broaden housing access, availability, physical quality, economic value, and longevity across the city for Billings' low-income residents including seniors, individuals with disabilities, minority groups, and other special populations.

Strategy: Increase affordable housing opportunities by implementing financing initiatives, including housing development loans to drive construction and rehabilitation, first-time homebuyer loans to support sustainable ownership, and home repair financing to preserve and upgrade existing low-income neighborhood homes.

Key Initiatives

- **Affordable Housing Development:** Promote citywide development of affordable single-family, multi-family, and special needs housing by offering loan financing to private developers and nonprofit organizations for new construction, rehabilitation, and infrastructure improvements.
- **First Time Home Buyer:** Offer accessible loan financing to foster first-time homeownership opportunities that support long-term financial stability, build generational wealth, and stabilize neighborhoods.

- **Home Repair:** Offer loan financing to agencies that assist low-income homeowners in completing essential repairs - such as major systems upgrades, weatherization, energy/water efficiency, and lead water service line replacements - to enhance and preserve the quality of Billings' affordable housing stock.
- **Foreclosure:** Mitigate the adverse effects of vacant, foreclosed properties by acquiring, rehabilitating, and selling these homes to low-income households - thereby combating urban decay, reducing crime, stabilizing property values, and stimulating the local economy.

Actions planned to reduce lead-based paint hazards.

The City continues to be compliant with HUD's lead-based paint requirements as established in September of 2000. 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.

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

Actions planned to reduce the number of poverty-level families.

All Consolidated Plan strategies target the improvement of economic conditions of lower-income households in the community, including housing development, financing home repair, continuing partnerships, and funding public service activities. The City proposes to support the following specific activities in the Consolidated Plan to address economic conditions of low-income households in Billings:

- Continuing to provide supportive services funding to nonprofit organizations through the HOME-ARP program, specific to qualified, eligible populations.
- Continue to work with nonprofit organizations to help address the human service needs of lower-income residents of the community in general and of our lower-income neighborhoods. This would be achieved primarily through supporting capacity building efforts of social service agencies through implementation of the *Billings Metro VISTA Project*.
- If available, continue to apply for the AmeriCorps VISTA project status to bring full-time and summer associate volunteers to work on poverty-impact programs.

AmeriCorps VISTA is a national anti-poverty initiative that places full-year and Summer Associate volunteers with local projects. Full-year VISTA members are recruited locally and nationally, are college graduates, and commit to at least a year of service with a project. Summer Associates are at least 18 years old and commit to ten weeks of service.

Actions planned to develop institutional structure.

The City of Billings maintains strong partnerships with housing and social service agencies. The only gaps in the institutional structure relate to funding limitations and the City's inability to dedicate time and resources to additional projects outside of the current funding structure.

Actions planned to enhance coordination between public and private housing and social service agencies.

The City will continue coordinating with public, private, and social service agencies to further activities and projects identified herein, including collaborating via the following:

- Nonprofit Organizations
- Neighborhood Task Forces
- Billings Metro VISTA Project
- HOME-ARP Supportive Services

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Introduction

The City of Billings has programmed all available revenues in current programs identified herein.

**Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(I)(1)**

1. Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.	\$0
2. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed.	\$0
3. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	\$0
4. The amount of surplus funds from urban renewal settlements.	\$0
5. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0
6. The amount of income from float-funded activities.	\$0
Total Program Income:	\$0

Other CDBG Requirements

1. The amount of urgent need activities.	\$0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low- and moderate-income. Overall Benefit - A consecutive period of one, two, or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specific the years covered that include this Annual Action Plan.	100%
FY Year Covered 2024	

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The above-noted regulation refers to the use of HOME funds for eligible activities. The City of Billings will not utilize HOME funds outside of the following allowable investments:

- Equity investments, interest-bearing loans or advances, non-interest-bearing loans or advances, interest subsidies consistent with the purposes of this part, deferred payment loans, grants, or other forms of assistance that HUD determines to be consistent with the purposes of this part. Each participating jurisdiction has the right to establish the terms of assistance, subject to the requirements of this part.
- Guarantee loans made by lenders and, if required, the participating jurisdiction may establish a loan guarantee account with HOME funds. The HOME funds may be used to guarantee the timely payment of principal and interest or payment of the outstanding principal and interest upon foreclosure of the loan. The amount of the loan guarantee account must be based on a reasonable estimate of the default rate on the guaranteed loans, but under no circumstances may the amount on deposit exceed 20% of the total outstanding principal amount guaranteed; except that the account may include a reasonable minimum balance. While loan funds guaranteed with HOME funds are subject to all HOME requirements, funds which are used to repay the guaranteed loans are not.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture provisions permit the original homebuyer to sell the assisted property to any willing buyer during the period of affordability while the City can recapture all, or a portion of the HOME assistance provided to the original homebuyer. The City utilizes recapture provisions exclusively when assisting homeowners and the provisions are enforced via a Promissory Note (not recorded), the use of a Deed Restriction Agreement and a Montana Trust Indenture that are both recorded at the Yellowstone County Clerk and Recorder's office. These written, legal documents contain language outlining the recapture provisions as established herein. The City does not use subrecipients or other grantees to carry out these activities.

Homebuyer Requirements: For homeownership housing to qualify as affordable housing eligible for HOME funding, it must be single-family; considered modest housing; be acquired by a low-income household for their principal residence; and meet affordability requirements for a single period determined by the amount of assistance provided. The City utilizes [single family mortgage limits set by HUD](#).

Direct HOME Subsidy: The amount of HOME assistance that enabled the homebuyer to buy the unit. The direct subsidy includes down payment and closing costs provided directly to the homebuyer, which resulted in a reduced purchase price from the fair market value of the home to an affordable price. The entire amount of HOME assistance is subject to recapture.

Net Proceeds: The sales price, less superior loan repayment and any closing costs. The City will only recapture the net proceeds from a sale. Any loans or improvements made to the property after the time of HOME assistance will be paid after the City is repaid the amount owed under its recapture provisions. If the net proceeds are not sufficient to recapture the full HOME investment, the City will accept the available net proceeds as full payment.

Recapture Model - City Recaptures Entire HOME Assistance Amount: The City allows the assisted homebuyer to retain all appreciation and the City expects to recapture the entire direct HOME subsidy invested in the project. Therefore, the homeowner will retain any value of the appreciation of the property after the City's HOME assistance has been recaptured / repaid. The homeowner's down payment, principal payments, and any capital improvement investment made in the property after the HOME assistance was provided will be returned to the homeowner at closing after the City's HOME assistance is recaptured and repaid from the net proceeds as described above.

Subordination: The City does not subordinate loans in the First Time Homebuyer program and other homeowner-assisted projects without City Administrator approval. Therefore, if an assisted homeowner refinances the property, the City will need to be repaid the full amount of HOME assistance provided.

Use of Recaptured Funds: Recaptured HOME funds will be used to assist other first-time homebuyers to purchase property in Billings or other HOME-eligible activities to be determined through the City's budget allocation process in accordance with the Citizen Participation Plan. Homebuyers must be low-income and must use the assisted property with the recaptured funds as their principal residence. Low-income and first-time homebuyer status will be determined based on HOME program regulations.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4) are as follows:

Long Term Affordability: Under the recapture provision, there is no requirement that the original HOME-assisted homebuyer sell the unit to another low-income homebuyer.

Affordability Periods: For City-assisted homebuyer units under the recapture provision, the period of affordability is based upon the direct HOME subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any program income used to provide direct assistance to the homebuyer is included when determining the period of affordability. Recapture provisions for the First Time Home Buyer program are either five or ten years for each assisted property beginning after the transfer of the property to the property owner as evidenced by the Deed Restriction Agreement, Montana Trust Indenture and Promissory Note.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Billings does not propose the use of HOME funds to refinance existing debt secured by multi-family housing that is being rehabilitated with HOME funds.

Section IV: Appendix

Appendix A: CDBG Application for Federal Assistance (SF-424)
