

Appendix A: Draft 2018-2019 Consolidated Annual Performance & Evaluation Report Public Comments and Agency Responses

The draft of the 2018-2019 Consolidated Annual Performance & Evaluation Report (“Draft CAPER”) was made available on June 4, 2019 for a 15-day public comment period ending June 21, 2019. The State of Montana held a public hearing on the Draft CAPER on June 13, 2019 and recorded a transcript of all comments received at the hearing. All comments received in writing and at the hearing were considered, and the State of Montana’s responses to each comment are provided below.

Comments Received and Responses Thereto

North Central Independent Living Services, Inc. Shyla Patera, IL Specialist

Comment #1:

I, Shyla Patera, wish to submit the following comments on the annual Consolidated Action Plan and Evaluation Report (CAPER) for the 2019 -2020 year on behalf of North Central Independent Living Services, Inc. We at NCILS wish to commend the Board of Housing for much of its work regarding HOME funds, CDBG funds, HOPWA Funds, ESG Funds and more to assist Montanans with disabilities and others in housing crisis to find more stability in their individual housing situations. However, we feel that more needs to be done regarding physical accessibility, visit-ability, and universal design both in our rental and homebuyer housing stock. The Montana Board of Housing should undertake an assessment of not only its physical housing stock, but also the programs, policies, and partnerships it is forming to ensure that all are accessible and being utilized by those with disabilities that may need the programs most. Community shelters should be accessible to all including those with mobility, sensory, and chemical disabilities.

NCILS applaud the undertaking of efforts to address coordinated entry for homelessness. However, as federal funds may become extremely narrow in scope over the next years, NCILS encourages innovative practices and policies to ensure that low income Montanans have access to rental housing. NCILS hopes that the State of Montana work with HUD and Montana’s Congressional delegation to ensure that Montana receives HUD funding at adequate levels and rates. NCILS asks that that HUD pursue flexible ideas and solutions to solving HUD barriers. We also would ask that the Board of Housing ,the State of Montana as well as the City of Great Falls advocate for those who wish to reintegrate into Montana communities that have lived in institutional settings i.e. the Montana Developmental Center, Warm Springs , correctional, and other nursing home settings. We believe that the State of Montana should help cities and rural areas explore 811 Housing, TBRA and other appropriate DPHHS and housing supports available in order to facilitate successful community transitions and meet Montana's Olmstead priorities. To meet this goal, we are advocating for both statewide and local housing navigators to be hired on staff when possible. Given potential funding constraints, we encourage public private partnerships and training to meet this goal. The City of Great Falls needs to study its community policies and ordinances so that

people with disabilities can live in our homes and apartments not be placed in nursing homes or assisted living settings. We need to focus on visit ability and universal design in new construction, but we also need to focus on financing home modifications in older homes.

Community Infrastructure plays a vital role in our communities. On the public infrastructure projects that are funded, NCILS hopes that communities will prioritize accessible curb cuts, contiguous sidewalks, alleyways as well community accessible streets policies will be studied, implemented and financed.

NCILS would encourage the Montana Housing and the Community Development Division to help communities find ways where DPHHS, Montana Housing, Community Development Division and MDT can shape policies and ideas and meld them together so that people with disabilities can live in fully integrated and accessible communities.

Given the potential impacts of potential funding losses in future federal budgets, Montana and other states should begin building educational coalitions to ensure that Montanans understand the economic impacts that housing and infrastructure play in our communities.

Response to Comment #1:

Thank you for your comment. The Montana Department of Commerce's Community Development administers the HOME Investment Partnerships (HOME), Community Development Block Grant (CDBG), and Housing Trust Fund (HTF) programs. The Department of Public Health and Human Services administers the Emergency Solutions Grant (ESG) and Housing Opportunities for Persons With AIDS (HOPWA) programs and establishes guidelines for how these programs can assist all eligible households with improved access. Comments made regarding programs and funds that are not covered under this Consolidated Annual Performance Evaluation Report will be shared with the Commerce's Housing Division and the Montana Board of Housing staff.

Commerce and DPHHS continue to support the inclusion of accessibility and visit-ability in proposed projects to the greatest extent possible, particularly when funds are used for newly constructed facilities or projects that involve ADA improvements. Commerce and DPHHS ensure ADA requirements are carried out, which includes documenting the completion of ADA self-assessment and transition plan when utilizing CDBG and HOME funds. Facilities including shelters funded through CDBG and HOME are required to be ADA accessible. ESG sub-grantees can choose to use a portion of their ESG allocation to help shelters meet ADA requirements if this is an identified need in their local assessment, however there is a statutory cap on how much can be spent on emergency shelters. Further, shelters are required to meet HUD reporting requirements. Additionally, case managers for both ESG and HOPWA help clients submit requests for reasonable accommodation to private landlords as well as advocate on behalf of their clients' needs and help educate private landlords.

Commerce and DPHHS will continue collaborating to increase the public and private partnerships through the Consolidated Plan processes. This includes ensuring opportunities for improved program delivery that can address any potential funding or regulatory changes. Commerce and

DPHHS continue this coordination through the collaborative work on the Analysis of Impediments to Fair Housing Choice and Coordinated Entry to the greatest extent possible.