



Governor Steve Bullock

# State of Montana

## Consolidated Annual Performance and Evaluation Report

April 1, 2019 through March 31, 2020



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# Consolidated Annual Performance and Evaluation Report

## *Introduction*

The Montana Departments of Commerce (Commerce) and Public Health and Human Services (DPHHS) receive annual U.S. Department of Housing and Urban Development (HUD) funding for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and National Housing Trust Fund (HTF) programs. Funding through these programs is a key component to organizations struggling to obtain scarce funding to serve households at or below 80% of area median income (AMI). As demonstrated in this 2019-2020 Consolidated Annual Performance and Evaluation Report (CAPER), these programs have been a critical funding source for constructing senior and health facilities in rural areas; developing housing facilities to assist disadvantaged populations; supporting economic opportunities for low- and moderate-income (LMI) beneficiaries; and providing clean water and sanitary sewer to support the growth of vital, resilient communities across Montana.

The State of Montana's CAPER serves as the report to HUD regarding the outcome of the goals and objectives with the resources made available through the CDBG, HOME, ESG, and HTF programs during the 2019-2020 Annual Action Plan and the 2015-2020 Montana Consolidated Plan for Housing and Community Development (Consolidated Plan). The 2019-2020 Annual Action Plan and the 2015-2020 Consolidated Plan comprehensively fulfill three basic goals in Montana: provide decent housing, provide a suitable living environment, and expand economic opportunities. The 2019-2020 Annual Action Plan summarizes the actions Montana will take to support the strategic goals identified in the 2015-2020 Consolidated Plan during the plan's fifth year, which is April 1, 2019, through March 31, 2020. The CAPER identifies the accomplishments of the CDBG, HOME, ESG, and HTF programs through detailed reports or spreadsheets and narrative.

Commerce and DPHHS have evaluated their performance in previous CAPERs for the 2015-2020 Consolidated Plan. All information relevant to the 2015-2020 Consolidated Plan is reported in the HUD Integrated Data Information System (IDIS), which interfaces with the eCon Planning Suite. IDIS and the eCon Planning Suite establish the format and manner in which data is collected and reported in all Consolidated Plan documents. The 2019-2020 CAPER is the fifth CAPER presented for the 2015-2020 Consolidated Plan, and accompanying documents, and is in the eCon Planning Suite format prescribed by HUD. This new format heavily relies on reports and spreadsheets specifically established electronically and derives its results from the objectives and outcomes specifically established in the 2019-2020 Annual Action Plan. This format allows this, and each

future, CAPER to report on specific information for each year's Annual Action Plan and includes an evaluation of past performance through measurable goals and objectives compared with actual performance. The award of federal funds, for programs reported in this document, occurred nearly 6 months into the state's program year (April 1, 2019 to March 31, 2020). The State received its federal funding agreement in September 2019, which delayed the implementation and award of funds for the State's program year. As a result, some program awards occurred after the ending of the State's program year but will be reported in the 2020-2021 CAPER to ensure that interested parties are aware of the distribution of funds awarded in this program year. Additionally, within this document there is data to augment the prepopulated tables from IDIS; this additional data is combined with the eCon Planning Suite prepopulated data in the cumulative tables, and other information or tables have been added to continue to report additional program accomplishments tracked by the State.

The State of Montana's CAPER references various IDIS reports, which the State uses to report accomplishments and progress made towards meeting established goals. These reports, which summarize project-level data for each program, are available and will be provided to the public and other stakeholders upon request.

## CR-05 – Goals and Outcomes

*Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a) This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.*

The 2019-2020 Annual Action Plan established five goals using the available resources from CDBG, HOME, HTF, and ESG funds that would address needs across the state. Programs have begun to award funds to project activities that will address the five goals established in the 2019-2020 Annual Action Plan. Commerce planned to devote funds to each of the following goals:

- 15.1% of CDBG funds, 73.4% of HOME funds, and 66.7% of HTF funds to Preserve and Construct Affordable Housing;
- 7.9% of CDBG funds to Plan for Communities;
- 36.6% of CDBG funds to Improve and Sustain Public Infrastructure;
- 28.5% of CDBG funds to Revitalize Local Economies; and
- 7.2% of CDBG funds, 16.6% of HOME funds, 100.0% of ESG funds, and 23.3% of HTF funds to Reduce Homelessness.

Actual expenditures for Plan Year 5 for both CDBG and HOME totaled \$7,999,517.70. These expenditures primarily include funding from past years. Once CDBG and HOME funds are awarded, construction activities and expenditures typically begin within 12 to 15 months. Projects take two to four years to complete before the accomplishments associated with those expenditures are reported. Therefore, the annual CAPER reporting includes project expenditures and accomplishments from previous fiscal years and goals and objectives from previous Annual Action Plans. It should also be noted that actual expenditures for Plan Year 5 for HTF totaled \$2,745,047.88, making the grand total of CDBG, HOME, and HTF expenditures for the State of Montana \$10,744,565.58.

In addition to expending program funds in support of existing projects, Commerce also awarded program funds to several new projects. The State received applications from seven applicants (eight applications) for the 2019 HTF application cycle. HTF funding was awarded in January of 2020 to five applicants (six projects): Rocky Mountain Development Council, ASI Great Falls, Inc., Missoula Housing Authority, ASI Billings, Inc., and Affiliated Developers, Inc. The State received one application for the 2019 HOME application cycle. HOME funding was awarded in January 2020 to Homeward, Inc. The State will award 2019 CDBG funds after the program year (April 1, 2019 to March 31, 2020) and report 2019 CDBG awards made in future CAPERs. For a detailed

account of all HTF, HOME, and CDBG projects awarded during Plan Year 5 (all funding years), see Table CR-05A – Projects Awarded During Plan Year 2019-2020.

Commerce, through the CDBG and HOME programs, has made progress towards the goals and objectives identified in the 2015-2020 Consolidated Plan and 2019-2020 Annual Action Plan. Commerce awarded CDBG and HOME funds during the 2019-2020 Annual Action Plan year to activities that addressed all five goals.

The first goal, Preserve and Construct Affordable Housing, expended \$2,660,653.16 in CDBG and HOME resources combined, which provided assistance to 47 eligible households across the state with rental developments or homebuyer financial assistance. The second goal, Plan for Communities, expended \$594,092.44 in CDBG resources, which supported local governments with planning activities to address various land use planning and project specific planning needs across the state to assist with long term development. The third goal, Improve and Sustain Public Infrastructure, expended \$3,709,301.31 in CDBG resources and assisted 5,977 income-eligible persons with new or improved access to vital public infrastructure. The fourth goal, Revitalize Local Economies, expended \$964,468.85 in CDBG resources to create or retain 52 jobs that will benefit income-eligible businesses or individuals. Lastly, with the fifth goal, Reduce Homelessness, the State assisted homeless individuals with \$720,425.99 of ESG funds for housing and services across the state. During the report period, HTF, CDBG and HOME awarded funds to projects that will reduce homelessness, but no funds were expended during the program year.

Montana communities most often use CDBG, HOME, and HTF funds in combination with other federal, state, or local funds to serve the needs of income-eligible households through projects that address all the goals listed above. Eligible applicants prepare planning documents that better identify the communities' highest priority needs and the types of development that need to occur in the community to meet these needs. As determined at the local level, applicants frequently apply with partner organizations, for CDBG, HOME, and HTF funding for projects with a high priority need and are supported within the community. Commerce does not dictate which applicants apply or which projects are submitted for funding; applications vary from year to year and the sum of submissions may not result in meeting exactly the planned goals or objectives.

ESG assisted a total of 885 individuals, spending \$256,666.87 to serve 484 individuals through Homeless Prevention activities and \$317,493.84 to serve 349 individuals through Rapid Rehousing activities which included Case Management, Rental Assistance, Rental Arrears, Security Deposit payments, and other expenditures for housing relocation and stabilization services. Subrecipient spent \$7,082.54 to assist their area's women's domestic violence shelters, which serves 52 individuals through essential services and operations support. One subrecipient

used \$1,241.08 for Street Outreach Activities. While one subrecipient has very effectively and consistently used a portion of ESG to fund their area’s coordinated assessment and assistance system, other ESG subrecipients have set up their coordinated entry systems and are using ESG in combination with other area funds to cover expenses.

*Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g) Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.*

As stated earlier, the CDBG, HOME, and HTF programs do not prescribe the location or type of activities that are submitted by local communities across the state, therefore, some goals were not met due to the lack of applications received to address a specific goal. Commerce based the 2019-2020 Annual Action Plan goals on the historical awards and activities completed with program funding.

Helping an individual secure stable housing to prevent homelessness or rehouse someone who is homeless or at risk of homelessness requires more than one-time support and more intensive case management. Therefore, ESG subrecipients are finding it necessary to spend more funds per client assisted than anticipated and are not able to help as many individuals as planned.

Table 1 – Accomplishments – Program Year & Strategic Plan to Date, shows both Plan Year 5 data as well as cumulative data for the 2015-2020 Consolidated Plan. The first three data columns (Expected – Strategic Plan, Actual – Strategic Plan, and Percent Complete) reflect the first four program years of the 2015-2020 Consolidated Plan. Data is drawn from Commerce-specific sources and IDIS reports PR23 Home Disbursements and Unit Completions and PR23 Count of CDBG Activities with Disbursements by Activity Group & Matrix Code.

The last three data columns (Expected – Program Year, Actual – Program Year, and Percent Complete) reflect the most recent completed program year (Plan Year 5) of the 2015-2020 Consolidated Plan. Data is drawn from IDIS reports PR23 HOME Disbursements and Unit Completions and PR23 Count of CDBG Activities with Disbursements by Activity Group & Matrix Code. No data is reported for HTF as projects have not been completed during Plan Year 5.

**Table 1 – Accomplishments – Program Year & Strategic Plan to Date**

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Improve and Sustain Public Infrastructure	Non-Housing Community Development	CDBG: \$1,300,000	Public Facility or Infrastructure Activities Other than Low/Moderate Income Housing Benefit	Persons Assisted	5,000	208,280*	4,165.60%	2,000	5,977	298.85%
Improve and Sustain Public Infrastructure	Non-Housing Community Development		Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	100	0	0.00%	20	0	0.00%
Plan for Communities	Non-Housing Community Development	CDBG: \$500,000	Other	Other: Communities Assisted	10	22	220.00%	10	1	10.00%
Preserve and Construct Affordable Housing	Affordable Housing	CDBG: \$950,000 HOME: \$2,205,159 National Housing Trust Fund (NHTF): \$2,000,000	Rental units constructed	Household Housing Unit	125	194*	155.20%	25	3	12.00%
Preserve and Construct Affordable Housing	Affordable Housing		Rental units rehabilitated	Household Housing Unit	125	22	17.60%	20	0	0.00%
Preserve and Construct Affordable Housing	Affordable Housing		Homeowner Housing Added	Household Housing Unit	25	0	0.00%	2	0	0.00%
Preserve and Construct Affordable Housing	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	20	4*	20.00%	4	2	50.00%
Preserve and Construct Affordable Housing	Affordable Housing		Direct Financial Assistance to Homebuyers	Households Assisted	250	242*	96.80%	50	42	84.00%
Reduce Homelessness	Homeless	CDBG: \$750,000 HOME: \$500,000 ESG: \$720,425.99 National Housing Trust Fund (NHTF): \$700,000	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	3,000	1,770*	59.00%	600	349	58.17%
Reduce Homelessness	Homeless		Homeless Person Overnight Shelter	Persons Assisted	600	2,124*	354.00%	60	52	0.00%
Reduce Homelessness	Homeless		Overnight / Emergency Shelter / Transitional Housing Beds added	Beds	23	18*	78.26%	5	0	0.00%
Reduce Homelessness	Homeless		Homelessness Prevention	Persons Assisted	3,000	3,313*	110.43%	600	484	80.67%
Reduce Homelessness	Homeless		Housing for Homeless added	Household Housing Unit	50	42*	84.00%	15	0	0.00%

**Table 1 – Accomplishments – Program Year & Strategic Plan to Date**

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Revitalize Local Economies	Non-Housing Community Development	CDBG: \$2,488,226	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	3	62	2,066.67%	3	0	0.00%
Revitalize Local Economies	Non-Housing Community Development		Façade treatment / business building rehabilitation	Business	5	20	400.00%	1	20	2,000.00%
Revitalize Local Economies	Non-Housing Community Development		Brownfield acres remediated	Acre	3	0	0.00%		0	
Revitalize Local Economies	Non-Housing Community Development		Jobs created / retained	Jobs	100	579*	579.00%	15	32	213.33%
Revitalize Local Economies	Non-Housing Community Development		Businesses assisted	Businesses Assisted	20	0	0.00%	4	0	0.00%

\*A combination of Commerce-specific sources and data reported in the eCon Planning Suite to produce a cumulative total.

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

As stated above, the 2019-2020 Annual Action Plan identified the following five goals:

- Preserve and Construct Affordable Housing
- Plan for Communities
- Improve and Sustain Public Infrastructure
- Revitalize Local Economies
- Reduce Homelessness

As reflected in Table CR-05A, the CDBG, HOME, and HTF programs funded and initiated project activities during Plan Year 5 in communities across the state that will assist income-eligible populations once the activities are completed. This table reflects the CDBG activities that were reported on the Timely Distribution Report, submitted to HUD. The table below is a Commerce-specific table which contains information for grants that have been awarded in the program year.

**Table CR-05A – Projects Awarded During Plan Year 2019-2020**

Applicant	County	Funds Awarded	Program Type	Annual Action Plan Goal	Project Description
Anaconda-Deer Lodge City-County	Deer Lodge	\$33,750	CDBG	Plan for Communities	Planning (Housing Needs Assessment and Market Study)
Belt, Town of	Cascade	\$26,250	CDBG	Plan for Communities	Planning (Subdivision and Zoning Regulations)
Butte-Silver Bow City-County	Silver Bow	\$50,000	CDBG	Plan for Communities	Planning (Preliminary Architectural Report)
Butte-Silver Bow City-County	Silver Bow	\$700,000	CDBG	Revitalize Local Economies	Renovation of the Hotel Finlen to reopen the annex
Carter County	Carter	\$400,000	CDBG	Revitalize Local Economies	Purchase of new medical equipment for Dahl Memorial Hospital
Culberston, Town of	Roosevelt	\$30,000	CDBG	Plan for Communities	Planning (Growth Policy and Capital Improvement Plan)
Deer Lodge, City of	Deer Lodge	\$33,750	CDBG	Plan for Communities	Planning (Parks & Trails Plan)
Dillon, City of	Beaverhead	\$24,000	CDBG	Plan for Communities	Planning (Capital Improvement Plan)
Dodson, Town of	Phillips	\$362,150	CDBG	Improve and Sustain Public Infrastructure	Wastewater system improvements
East Helena, City of	Lewis & Clark	\$15,000	CDBG	Plan for Communities	Planning (Growth Policy Update)
Ekalaka, Town of	Carter	\$23,850	CDBG	Plan for Communities	Planning (Flood Study)

**Table CR-05A – Projects Awarded During Plan Year 2019-2020**

Applicant	County	Funds Awarded	Program Type	Annual Action Plan Goal	Project Description
Ekalaka, Town of	Carter	\$200,000	CDBG	Revitalize Local Economies	Purchase of new medical equipment for Dahl Memorial Hospital
Flathead County	Flathead	\$45,000	CDBG	Plan for Communities	Planning (Preliminary Architectural Report)
Geraldine, Town of	Chouteau	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Wastewater system improvements
Glasgow, City of	Valley	\$30,000	CDBG	Plan for Communities	Planning (Critical Needs Assessment)
Hardin, City of	Big Horn	\$24,750	CDBG	Plan for Communities	Planning (Growth Policy and Downtown Revitalization Plan)
Helena, City of	Lewis & Clark	\$0 <i>Funds will be set aside as projects are identified</i>	CDBG	Preserve and Construct Affordable Housing	Construction to rehabilitate single-family residences to address health, safety and accessibility issues
Hot Springs, Town of	Sanders	\$37,500	CDBG	Plan for Communities	Planning (Capital Improvement Plan)
Jefferson County	Jefferson	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Water system improvements
Lake County	Lake	\$450,000	CDBG	Preserve and Construct Affordable Housing	New construction of Meadowlark Vista, a 24-unit rental development for income-eligible households
Lewis & Clark County	Lewis & Clark	\$32,000	CDBG	Plan for Communities	Planning (Preliminary Architectural Report)
Lewistown, City of	Fergus	\$35,000	CDBG	Plan for Communities	Planning (Critical Needs Assessment and Preliminary Architectural Report)
Libby, City of	Lincoln	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Water system improvements
Libby, City of	Lincoln	\$13,000	CDBG	Plan for Communities	Planning (Preliminary Architectural Report)
Madison County	Madison	\$450,000	CDBG	Revitalize Local Economies	Renovation of kitchen facility at Madison Valley Manor
Malta, City of	Phillips	\$47,000	CDBG	Plan for Communities	Planning (Preliminary Architectural Report)
Manhattan, Town of	Gallatin	\$30,000	CDBG	Plan for Communities	Planning (Growth Policy)

**Table CR-05A – Projects Awarded During Plan Year 2019-2020**

Applicant	County	Funds Awarded	Program Type	Annual Action Plan Goal	Project Description
Mineral County	Mineral	\$0 <i>Funds will be set aside as projects are identified</i>	CDBG	Preserve and Construct Affordable Housing	Construction to rehabilitate single-family residences to address health, safety and accessibility issues
Missoula County	Missoula	\$450,000	CDBG	Reduce Homelessness	New construction of See Them Home Family Housing Center, a 13-room Domestic Violence Shelter, 25 housing rooms for homeless families, and overflow space to accommodate an additional 6 families.
Park County	Park	\$21,000	CDBG	Plan for Communities	Planning (Preliminary Architectural Report)
Plains, Town of	Sanders	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Wastewater system improvements
Roosevelt County	Roosevelt	\$30,000	CDBG	Plan for Communities	Planning (Growth Policy Update)
Rosebud County	Rosebud	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Construction to replace roof and remodel restrooms for ADA compliance at school
Rosebud County	Rosebud	\$400,000	CDBG	Improve and Sustain Public Infrastructure	Upgrade coal boiler system, HVAC, and electrical system; modify restrooms and locker rooms for ADA compliance at school
Roundup, City of	Musselshell	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Water system improvements
Sheridan, Town of	Madison	\$30,000	CDBG	Plan for Communities	Planning (Growth Policy and Capital Improvement Plan)
Teton County	Teton	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Water system improvements
Teton County	Teton	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Water system improvements
Three Forks, City of	Gallatin	\$30,000	CDBG	Plan for Communities	Planning (Growth Policy)
Townsend, City of	Broadwater	\$11,250	CDBG	Plan for Communities	Planning (Zoning Regulations and Growth Policy Update)
Twin Bridges, Town of	Madison	\$39,450	CDBG	Plan for Communities	Planning (Floodplain Study)
Valley County	Valley	\$0 <i>Withdrawn</i>	CDBG	Plan for Communities	Planning (Countywide Wayfinding Plan)

**Table CR-05A – Projects Awarded During Plan Year 2019-2020**

<b>Applicant</b>	<b>County</b>	<b>Funds Awarded</b>	<b>Program Type</b>	<b>Annual Action Plan Goal</b>	<b>Project Description</b>
Valley County	Valley	\$30,000	CDBG	Plan for Communities	Planning (Growth Policy and Capital Improvement Plan)
Whitehall, Town of	Jefferson	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Water system improvements
Wibaux County	Wibaux	\$26,550	CDBG	Plan for Communities	Planning (Growth Policy)
Winifred, Town of	Fergus	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Water system improvements
Winnett, Town of	Petroleum	\$450,000	CDBG	Improve and Sustain Public Infrastructure	Water system improvements
Yellowstone County	Yellowstone	\$40,000	CDBG	Plan for Communities	Planning (Corridor Plan)
Homeward, Inc.	Missoula	\$500,000	HOME	Preserve and Construct Affordable Housing	New construction of Trinity (Cooley site), a 71-unit rental development for income-eligible households, (8 HOME-assisted units)
Lake County Community Housing Organization	Lake	\$923,000	HOME	Preserve and Construct Affordable Housing	New construction of Meadowlark Vista, a 24-unit rental development for income-eligible households (6 HOME-assisted units)
Missoula Housing Authority	Missoula	\$1,200,000	HOME	Preserve and Construct Affordable Housing	New construction of Villagio, a 200-unit rental development for income-eligible households (10 HOME-assisted units)
Accessible Space	Cascade	\$170,000	HTF	Preserve and Construct Affordable Housing	Construction to rehabilitate Southwinds Estate (elevator), a 24-unit rental development for income-eligible seniors and disabled persons (23 HTF-assisted units)
Accessible Space	Yellowstone	\$120,000	HTF	Preserve and Construct Affordable Housing	Construction to rehabilitate Grandview Apartments (elevator), a 25-unit rental development for income-eligible adults with physical disabilities (24 HTF-assisted units)
Affiliated Developers, Inc.	Hill	\$173,000	HTF	Preserve and Construct Affordable Housing	Construction to rehabilitate Oakwood Village, a 60-unit rental development for income-eligible households (12 HTF-assisted units)

**Table CR-05A – Projects Awarded During Plan Year 2019-2020**

<b>Applicant</b>	<b>County</b>	<b>Funds Awarded</b>	<b>Program Type</b>	<b>Annual Action Plan Goal</b>	<b>Project Description</b>
Missoula Housing Authority	Missoula	\$2,500,000	HTF	Preserve and Construct Affordable Housing / Reduce Homelessness	New construction of Trinity (Mullan Road site), a 130-unit rental development, including 30 permanent supportive homes for homeless households (20 HTF-assisted units)
Rocky Mountain Development Council	Lewis & Clark	\$1,250,000	HTF	Preserve and Construct Affordable Housing	Construction to rehabilitate Fire Tower, a 44-unit rental development for income-eligible seniors (9 HTF-assisted units).
Rocky Mountain Development Council	Lewis & Clark	\$295,000	HTF	Preserve and Construct Affordable Housing	New construction of Red Alder, an 85-unit rental development for income-eligible households (13 HTF-assisted units)

## CR-10 – Racial and Ethnic Composition of Families Assisted

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

**Table 2 – Table of Assistance to Racial and Ethnic Populations by Source of Funds**

	CDBG	HOME	HOPWA	ESG	HTF
White	404	43	0	618	0
Black or African American	3	0	0	16	0
Asian	9	0	0	0	0
American Indian or American Native	58	2	0	166	0
Native Hawaiian or Other Pacific Islander	0	0	0	5	0
Other	4	0	0	80	0
Not Identified	0	0	0	0	0
<b>Total</b>	<b>478</b>	<b>45</b>	<b>0</b>	<b>885</b>	<b>0</b>
Hispanic	13	0	0	76	0
Not Hispanic	0	45	0	807	0
Not Identified	465	0	0	2	0

### *Narrative*

The CDBG, HOME, HTF, and ESG programs assisted persons from various racial and ethnic backgrounds during Plan Year 5. 1,065 assisted individuals identified as White; 19 assisted individuals identified as Black or African American; 9 assisted persons identified as Asian; 226 assisted individuals identified as American Indian or American Native; and 5 assisted individuals identified as Native Hawaiian or Other Pacific Islander. 852 of the assisted individuals identified their ethnic background as Not Hispanic and 89 assisted individuals identified as Hispanic. Ethnic and racial data collected from completed CDBG projects did not interface correctly between Commerce’s collection and IDIS report. The demographic data provided in Table 2 is drawn from IDIS and the eCon Planning Suite. These numbers are for the projects completed during Plan Year 5 and are not cumulative for the 2015-2020 Consolidated Plan. All racial and ethnic information is reported at project completion. Since there have not been projects completed for the HTF Program during Plan Year 5, no HTF data is entered in Table 2.

Because the State of Montana’s HOPWA funds are provided via competitive award and not through a formula grant, HOPWA data is not included in Table 2. HOPWA data for competitive awards is presented in a separate report, the HOPWA Annual Progress Report (APR).

## CR-15 – Resources and Investments 91.520(a)

### Identify the resources made available

Table 3 – Resources Made Available, reflects Plan Year 5 and the previous plan years’ combined resources that were not awarded or drawn.

**Table 3 – Resources Made Available**

Sources of Funds	Source	Resources Made Available*	Amount Expended During Program Year
CDBG	Public/Federal	\$7,906,042	\$5,940,846.86
HOME**	Public/Federal	\$3,105,732	\$2,058,670.84
HOPWA	Public/Federal		
ESG	Public/Federal	\$700,400	\$720,425.99
HTF***	Public/Federal	\$3,885,000	\$2,745,047.88

\* Amounts in this column reflect the estimates provided in the 2019-2020 Annual Action Plan.

\*\* \$3,388,813 in HOME resources was actually made available. This amount includes \$2,705,159 from the 2019 HOME allocation (allocation less administrative set-aside), as well as \$683,654 from remaining 2018 HOME funds.

\*\*\* \$623,000 was rescinded from the Lake County Community Housing Organization, making actual HTF resources available \$4,508,000.

### Narrative

During the 2019-2020 program year, the HOME program received an allocation of \$3,005,732. Utilizing resources made available, the HOME program awarded a total of \$2,623,000 to three multi-family rental projects as follows: \$500,000 to Homeward, Inc., for Trinity; \$923,000 to the Lake County Community Housing Organization for Meadowlark Vista; and \$1,200,000 to the Missoula Housing Authority for Villagio. In addition, \$600,000 in HOME funds were designated to provide down payment assistance to first-time homebuyers through three entities: Human Resource Development Council 9, the City of Missoula, and NeighborWorks Montana. It should be noted that HOME’s resources made available exceed the received allocation because it includes the annual allocation, carryover from previous years, and receipted program income.

During the 2019-2020 program year, the HTF program received an allocation of \$3,000,000. Utilizing resources made available, the HTF program awarded a total of \$4,508,000 to six projects as follows: \$170,000 to Accessible Space for Southwinds Estates; \$120,000 to Accessible Space for Grandview Apartments; \$173,000 to Affiliated Developers, Inc., for Oakwood Village; \$2,500,000 to Missoula Housing Authority for Trinity; \$1,250,000 to Rocky Mountain Development Council for Fire Tower; and \$295,000 to Rocky Mountain Development Council for

Red Alder. It should be noted that HTF’s resources made available exceed the received allocation, which is a result of carryover from the previous plan years.

During the 2019-2020 program year, the CDBG program received an allocation of \$6,356,042. Utilizing resources made available, the CDBG program awarded a total of \$9,151,250 to 47 projects ranging from planning to public infrastructure improvements and equipment purchases (see Table CR-05A for project details).

Because the State of Montana’s HOPWA funds are provided via competitive award and not through a formula grant, HOPWA data is not included in Table 3. HOPWA data for competitive awards is presented in a separate report, the HOPWA APR.

*Identify the geographic distribution and location of investments*

**Table 4 – Identify the Geographic Distribution and Location of Investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

*Narrative*

As described in the 2015-2020 Consolidated Plan and the 2019-2020 Annual Action Plan, Commerce does not target any particular geographic area for special assistance but will allow any non-entitlement community to apply for CDBG and all communities and other eligible entities to apply for HOME and HTF program funding, dependent on eligible activities. While there is no geographical distribution planned in the 2015-2020 Consolidated Plan or 2019-2020 Annual Action plan, Table CR-15A does provide a lookback at the awards made for the CDBG, HTF, and HOME Program funds by County during the 2019-2020 program year and cumulatively for the 2015-2020 Consolidated Plan period. The table applies a percentage allocation specific to each geographic area. Of the 56 counties in Montana, 49 have received CDBG, HOME, or HTF, or a combination of funding during the 2015-2020 Consolidated Plan period.

**Table CR-15A – Project Geographic Distribution and Percentage of Allocation for CDBG, HOME, and HTF**

County	2015-16 Funded Amount	2015-16 % of Allocation	2016-17 Funded Amount	2016-17 % of Allocation	2017-18 Funded Amount	2017-18 % of Allocation	2018-19 Funded Amount	2018-19 % of Allocation	2019-20 Funded Amount	2019-20 % of Allocation	2015-20 Total Funded	2015-20 Total % of Allocation
Anaconda-Deer Lodge	\$675,000	7.77%	\$22,000	0.25%	\$1,400,000	11.93%			\$67,500	0.55%	<b>\$2,164,500</b>	<b>4.01%</b>
Beaverhead					\$294,000	2.50%	\$262,100	2.12%	\$24,000	0.19%	<b>\$580,100</b>	<b>1.07%</b>
Big Horn	\$478,140	5.51%					\$346,654	2.80%	\$24,750	0.20%	<b>\$849,544</b>	<b>1.57%</b>
Blaine			\$30,000	0.34%						0.00%	<b>\$30,000</b>	<b>0.06%</b>
Broadwater							\$230,000	1.86%	\$11,250	0.09%	<b>\$41,250</b>	<b>0.08%</b>
Butte-Silver Bow	\$37,500	0.43%	\$350,000	3.97%	\$950,000	8.09%	\$30,000	0.24%	\$750,000	6.07%	<b>\$2,317,500</b>	<b>4.29%</b>
Carbon	\$471,000	5.42%					\$450,000	3.63%		0.00%	<b>\$921,000</b>	<b>1.71%</b>
Carter			\$25,000	0.28%					\$623,850	5.05%	<b>\$648,850</b>	<b>1.20%</b>
Cascade	\$161,000	1.85%					\$450,000	3.63%	\$196,250	1.59%	<b>\$807,250</b>	<b>1.50%</b>
Chouteau			\$25,000	0.28%	\$800,000	6.82%			\$450,000	3.64%	<b>\$1,275,000</b>	<b>2.36%</b>
Custer	\$420,100	4.84%	\$30,000	0.34%						0.00%	<b>\$450,100</b>	<b>0.83%</b>
Daniels	\$10,000	0.12%								0.00%	<b>\$10,000</b>	<b>0.02%</b>
Dawson			\$25,000	0.28%						0.00%	<b>\$25,000</b>	<b>0.05%</b>
Fallon	\$22,500	0.26%	\$25,000	0.28%						0.00%	<b>\$47,500</b>	<b>0.09%</b>
Fergus			\$35,000	0.40%			\$135,000	1.09%	\$485,000	3.92%	<b>\$655,000</b>	<b>1.21%</b>
Flathead	\$437,459	5.04%	\$230,465	2.61%			\$1,492,307	12.05%	\$45,000	0.36%	<b>\$2,205,231</b>	<b>4.09%</b>
Gallatin	\$780,000	8.98%	\$832,000	9.44%	\$750,000	6.39%	\$25,000	0.20%	\$60,000	0.49%	<b>\$2,447,000</b>	<b>4.53%</b>
Garfield			\$400,000	4.54%						0.00%	<b>\$400,000</b>	<b>0.74%</b>
Glacier			\$400,000	4.54%						0.00%	<b>\$400,000</b>	<b>0.74%</b>
Golden Valley*										0.00%	<b>\$0</b>	<b>0.00%</b>
Granite*										0.00%	<b>\$0</b>	<b>0.00%</b>
Hill	\$790,000	9.10%	\$461,000	5.23%					\$173,000	1.40%	<b>\$1,424,000</b>	<b>2.64%</b>
Jefferson	\$15,000	0.17%					\$51,000	0.41%	\$900,000	7.28%	<b>\$966,000</b>	<b>1.79%</b>
Judith Basin			\$25,000	0.28%						0.00%	<b>\$25,000</b>	<b>0.05%</b>

**Table CR-15A – Project Geographic Distribution and Percentage of Allocation for CDBG, HOME, and HTF**

County	2015-16 Funded Amount	2015-16 % of Allocation	2016-17 Funded Amount	2016-17 % of Allocation	2017-18 Funded Amount	2017-18 % of Allocation	2018-19 Funded Amount	2018-19 % of Allocation	2019-20 Funded Amount	2019-20 % of Allocation	2015-20 Total Funded	2015-20 Total % of Allocation
Lake	\$450,000	5.18%	\$30,000	0.34%			\$923,000	7.45%	\$1,373,000	11.11%	\$2,776,000	5.14%
Lewis & Clark	\$18,300	0.21%	\$510,000	5.79%	\$1,177,344	10.03%	\$3,150,000	25.44%	\$1,592,000	12.88%	\$6,447,644	11.94%
Liberty*										0.00%	\$0	0.00%
Lincoln							\$511,500	4.13%	\$463,000	3.75%	\$974,500	1.81%
McCone	\$450,000	5.18%			\$450,000	3.83%				0.00%	\$900,000	1.67%
Madison	\$437,388	5.04%	\$20,000	0.23%					\$519,450	4.20%	\$976,838	1.81%
Meagher	\$18,000	0.21%								0.00%	\$18,000	0.03%
Mineral			\$570,000	6.47%			\$224,892	1.82%		0.00%	\$794,892	1.47%
Missoula	\$1,450,000	16.70%	\$373,770	4.24%			\$991,000	8.00%	\$4,650,000	37.62%	\$7,464,770	13.83%
Musselshell	\$483,750	5.57%			\$450,000	3.83%			\$450,000	3.64%	\$1,383,750	2.56%
Park	\$28,000	0.32%			\$850,000	7.24%	\$50,000	0.40%	\$21,000	0.17%	\$949,000	1.76%
Petroleum	\$22,500	0.26%					\$35,000	0.28%	\$450,000	3.64%	\$507,500	0.94%
Phillips	\$26,800	0.31%			\$320,000	2.73%	\$300,000	2.42%	\$409,150	3.31%	\$1,055,950	1.96%
Pondera*										0.00%	\$0	0.00%
Powder River							\$50,000	0.40%		0.00%	\$50,000	0.09%
Powell	\$30,000	0.35%					\$182,270	1.47%		0.00%	\$212,270	0.39%
Prairie	\$40,000	0.46%								0.00%	\$40,000	0.07%
Ravalli	\$827,000	9.52%	\$28,333	0.32%	\$450,000	3.83%				0.00%	\$1,305,333	2.42%
Richland*										0.00%	\$0	0.00%
Roosevelt	\$40,000	0.46%	\$450,000	5.11%			\$840,000	6.78%	\$60,000	0.49%	\$1,390,000	2.57%
Rosebud							\$80,000	0.65%	\$850,000	6.88%	\$930,000	1.72%
Sanders	\$35,000	0.40%	\$450,000	5.11%	\$450,000	3.83%	\$490,500	3.96%	\$487,500	3.94%	\$1,913,000	3.54%
Sheridan	\$22,500	0.26%								0.00%	\$22,500	0.04%
Stillwater							\$400,000	3.23%		0.00%	\$400,000	0.74%

**Table CR-15A – Project Geographic Distribution and Percentage of Allocation for CDBG, HOME, and HTF**

County	2015-16 Funded Amount	2015-16 % of Allocation	2016-17 Funded Amount	2016-17 % of Allocation	2017-18 Funded Amount	2017-18 % of Allocation	2018-19 Funded Amount	2018-19 % of Allocation	2019-20 Funded Amount	2019-20 % of Allocation	2015-20 Total Funded	2015-20 Total % of Allocation
Sweet Grass*										0.00%	\$0	0.00%
Teton									\$900,000	7.28%	\$900,000	1.67%
Toole							\$468,000	3.78%		0.00%	\$468,000	0.87%
Treasure*										0.00%	\$0	0.00%
Valley							\$492,000	3.97%	\$30,000	0.24%	\$522,000	0.97%
Wheatland	\$450,000	5.18%					\$450,000	3.63%		0.00%	\$900,000	1.67%
Wibaux									\$26,550	0.21%	\$26,550	0.05%
Yellowstone	\$818,000	9.42%	\$498,176	5.65%			\$1,321,000	10.67%	\$40,000	0.32%	\$2,677,176	4.96%

\*Counties have not applied for or were not awarded CDBG, HOME, or HTF funding.

## Leveraging

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

Commerce programs leveraged CDBG, HOME, and HTF resources with other federal, state, and local funding to maximize the impact of HUD funding and utilize available funding resources to conduct housing and community development activities that will benefit income-eligible households.

The CDBG program requires 25% matching funds for public infrastructure projects. For other CDBG project types, match is encouraged but not required. However, the maximum amount of CDBG funds that can be awarded to an individual project cannot exceed \$450,000 for grant construction activities, \$400,000 for economic development activities, or \$50,000 for grant planning activities. These caps make leveraging an important component of any CDBG-funded project.

CDBG match contributions are typically provided by a direct cash contribution or by incurring a loan through bond financing which is re-paid through user charges or property tax assessments. Other local match sources may include loan or grant funds from other federal or state grant programs, local funds expended for predevelopment planning, the value of donated land provided by the applicant, and/or the value of labor performed by the applicant's employees. The 25% match requirement may be waived if the local government demonstrates financial hardship and satisfies the waiver request requirements.

The HOME program requires 25% matching funds for both multi-family and single-family projects. HOME matching contributions must come from non-federal sources and are typically obtained through direct cash contributions; donated materials and labor; donated land or real property; foregone interest, taxes, fees, etc.; and proceeds from bond financing. Other non-federal local match sources are any non-duplicated HOME-eligible activities paid for with non-federal monies within the program year.

ESG funds are matched by subrecipients who provide rental assistance, transitional housing and/or supportive services through the Montana Continuum of Care (MT CoC) Program. A significant amount of local ESG subrecipients contribute additional resources such as block grant funds, local public funds, and local philanthropic foundation resources to the homeless programs

they operate. ESG grant funds are required to be matched 100% after the first \$100,000 of the fiscal year grant. The state recipient must transfer the benefit of this exception to its subrecipients that are least capable of providing the recipient with matching contributions. See 24 CFR §576.201 (matching requirement) for further details.

No match is required for CDBG housing or neighborhood renewal grants, but each applicants' relative ability to leverage other private, local, state, or federal funds is considered when ranking a proposed project for CDBG housing or neighborhood renewal grant funding.

Commerce's internal tracking processes are utilized to record and report all matching funds from CDBG, HTF, and HOME projects. These matching funds are in the form of bank loans, loans from state and federal agencies, bonds, non-federal grants, foregone property taxes, local and county funds, and in-kind services. Grantees submit invoices and correlate funding sources to specific expenditures. Commerce staff track the eligible matching funds with each invoice and track the cumulative tally throughout the project process. Table 5 – Fiscal Year Summary – HOME Match, below, indicates the excess matching funds the HOME Program carried over from previous program years, matching funds contributed during the 2019-2020 program year, the total of all matching funds available for the current fiscal year, the required amount of Match Liability for the current fiscal year as noted by the IDIS report PR33 Home Matching Liability Report, and the excess match that will be carried over to the next fiscal year. The match reported below falls within the federal fiscal year: October 1, 2018 through September 30, 2019 and will be submitted to HUD on the form HUD-40107-A through the eCon Planning Suite.

**Table 5 – Fiscal Year Summary – HOME Match Report**

1. Excess match from prior Federal fiscal year	18,438,552.19
2. Match contributed during current Federal fiscal year	778,711.12
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	19,217,263.31
4. Match liability for current Federal fiscal year	782,805.82
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	18,434,457.49

Table 6 – Match Contribution for the 2019 Federal Fiscal Year reports each matching fund contribution for Plan Year 5 from the HOME Program. Matching funds were recorded between October 1, 2018 through September 30, 2019 per HUD requirements. These funds are contributed as part of the Homebuyer Assistance grants and multi-family rental developments or rehabilitation projects. Matching funds are recorded in the form of bond financing, cash, appraised land or real property, and foregone taxes, fees, or charges as noted in Table 6.

**Table 6 – Match Contribution for the Federal Fiscal Year**

Project No. or Other ID	Date of Contribution	Cash (Non-Federal Sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation Construction, Materials, Donated Labor	Bond Financing	Total Match
4676	1/23/2019		\$140,384.87					\$140,384.87
4802	12/19/2018		\$49,819.45					\$49,819.45
4888	10/1/2018	\$5,000.00						\$5,000.00
4892	1/15/2019	\$5,000.00					\$42,187.50	\$47,187.50
4896	10/1/2018	\$5,000.00						\$5,000.00
4897	1/17/2019						\$36,250.00	\$36,250.00
4898	1/8/2019						\$37,904.00	\$37,904.00
4904	5/21/2019	\$7,000.00					\$54,436.25	\$61,436.25
4905	10/4/2018	\$5,000.00						\$5,000.00
4906	1/8/2019	\$9,000.00						\$9,000.00
4907	1/8/2019						\$42,929.25	\$42,929.25
4908	12/31/2018						\$39,772.50	\$39,772.50
4909	1/8/2019						\$33,459.50	\$33,459.50
4910	12/17/2018						\$40,404.00	\$40,404.00
4916	10/23/2018	\$15,000.00						\$15,000.00
4917	10/17/2018	\$5,000.00					\$47,006.50	\$52,006.50
4918	10/17/2018	\$5,000.00					\$47,032.00	\$52,032.00
4919	10/23/2018	\$5,000.00					\$31,799.50	\$36,799.50
4920	10/31/2018	\$2,100.57						\$2,100.57
4921	10/31/2018						\$42,735.00	\$42,735.00
4922	1/9/2019						\$50,000.00	\$50,000.00
4923	11/5/2018						\$15,771.25	\$15,771.25
4924	1/8/2019						\$51,767.50	\$51,767.50
4925	1/17/2019	\$75.00	\$1,005.00					\$1,080.00
4926	12/31/2018	\$5,000.00					\$34,340.50	\$39,340.50
4927	12/31/2018	\$5,000.00						\$5,000.00
4928	12/28/2018	\$5,000.00						\$5,000.00
4929	11/30/2018	\$2,000.00						\$2,000.00
4930	10/23/2018	\$15,000.00					\$33,221.25	\$48,221.25
4931	10/31/2018						\$38,293.50	\$38,293.50
4932	10/31/2018						\$40,404.00	\$40,404.00
4936	12/12/2018	\$6,500.00					\$27,017.50	\$33,517.50
4940	1/9/2019						\$38,029.00	\$38,029.00
4941	3/22/2019	\$5,000.00						\$5,000.00
4942	1/17/2019	\$1,800.00						\$1,800.00
4943	1/4/2019	\$5,000.00					\$33,806.25	\$38,806.25

**Table 6 – Match Contribution for the Federal Fiscal Year**

<b>Project No. or Other ID</b>	<b>Date of Contribution</b>	<b>Cash (Non-Federal Sources)</b>	<b>Foregone Taxes, Fees, Charges</b>	<b>Appraised Land/Real Property</b>	<b>Required Infrastructure</b>	<b>Site Preparation Construction, Materials, Donated Labor</b>	<b>Bond Financing</b>	<b>Total Match</b>
4944	3/22/2019	\$5,000.00						\$5,000.00
4945	1/23/2019	\$9,000.00					\$33,323.00	\$42,323.00
4946	12/31/2018	\$5,000.00						\$5,000.00
4948	3/22/2019	\$5,000.00						\$5,000.00
4949	12/31/2018			\$57,714.00				\$57,714.00
4957	12/31/2018						\$35,691.75	\$35,691.75
4958	3/22/2019	\$5,000.00						\$5,000.00
4979	1/14/2019						\$48,840.00	\$48,840.00
4980	1/17/2019	\$2,500.00						\$2,500.00
4986	1/23/2019						\$41,666.50	\$41,666.50
4989	3/21/2019	\$8,089.42						\$8,089.42
4990	1/17/2019						\$42,676.75	\$42,676.75
4994	2/13/2019						\$48,000.50	\$48,000.50
4995	3/5/2019						\$35,353.50	\$35,353.50
4996	3/5/2019						\$36,237.25	\$36,237.25
4997	3/22/2019	\$3,000.00					\$58,132.25	\$61,132.25
4998	4/4/2019						\$40,404.00	\$40,404.00
4999	4/3/2019	\$11,246.38					\$49,494.75	\$60,741.13
5001	3/27/2019	\$10,000.00					\$20,871.25	\$30,871.25
5002	4/11/2019	\$6,000.00					\$37,571.00	\$43,571.00
5021	7/15/2019	\$26,870.33						\$26,870.33
5022	5/29/2019	\$7,500.00						\$7,500.00
5025	6/18/2019	\$200.00					\$49,603.00	\$49,803.00
5028	8/8/2019	\$7,500.00					\$30,925.00	\$38,425.00
5029	6/6/2019	\$7,500.00						\$7,500.00
5030	8/1/2019	\$4,000.00						\$4,000.00
5031	8/8/2019	\$8,015.84					\$48,484.75	\$56,500.59
5032	7/29/2019	\$7,500.00						\$7,500.00
5033	7/15/2019	\$35,866.75						\$35,866.75
5034	7/29/2019	\$8,980.00					\$29,000.00	\$37,980.00
5057	8/8/2019	\$9,533.34						\$9,533.34
5058	8/13/2019	\$2,410.17					\$57,107.00	\$59,517.17
5059	8/8/2019	\$2,000.00						\$2,000.00
5060	8/13/2019	\$7,500.00					\$21,600.00	\$29,100.00
5061	8/8/2019	\$2,000.00						\$2,000.00
5081	9/17/2019	\$5,000.00						\$5,000.00

**Table 6 – Match Contribution for the Federal Fiscal Year**

<b>Project No. or Other ID</b>	<b>Date of Contribution</b>	<b>Cash (Non-Federal Sources)</b>	<b>Foregone Taxes, Fees, Charges</b>	<b>Appraised Land/Real Property</b>	<b>Required Infrastructure</b>	<b>Site Preparation Construction, Materials, Donated Labor</b>	<b>Bond Financing</b>	<b>Total Match</b>
5082	9/17/2019						\$20,820.50	\$20,820.50
5092	9/25/2019	\$5,100.00					\$32,828.25	\$37,928.25
		<b>\$335,787.80</b>	<b>\$191,209.32</b>	<b>\$57,714.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$1,677,197.75</b>	<b>\$2,261,908.87</b>
							<b>Total Non-Bond Financing Match:</b>	<b>\$584,711.12</b>
							<b>Total Bond Financing Match Eligible:</b>	<b>\$194,000.00</b>
							<b>TOTAL ELIGIBLE MATCH:</b>	<b>\$778,711.12</b>

CDBG program income was receipted and expended during Plan Year 5. The program income of \$60,000.00 in CDBG funds from an Economic Development grant to Lincoln County was receipted and expended on CDBG eligible activities during Plan Year 5. According to the IDIS report PR09, HOME began the program year with \$0.00 in program income, received \$923,065.11 in program income during the program year and expended \$923,065.11. The balance of program income was \$0.00. The HOME program does not award or expend funding for Tenant Based Rental Assistance (TBRA) activities, therefore there are zero dollars listed in the table below.

**HOME MBE/WBE Report**

**Table 7 – Program Income**

<b>Program Income – Enter the program amounts for the reporting period</b>				
<b>Balance on hand at the beginning of the reporting period \$</b>	<b>Amount received during reporting period \$</b>	<b>Total amount expended during reporting period \$</b>	<b>Amount expended for TBRA \$</b>	<b>Balance on hand at end of reporting period \$</b>
<b>\$0.00</b>	<b>\$923,065.11</b>	<b>\$923,065.11</b>	<b>\$0.00</b>	<b>\$0.00</b>

Commerce collects and records Disadvantaged Business Enterprise (DBE), Minority Business Enterprise (MBE), and Women-Owned Business Enterprise (WBE) information throughout the program year and reports it to HUD for the Federal Fiscal Year in the Contract and Subcontract Activity Report. Table 8 – Minority Business and Women Business Enterprises, shows the number of contracts reported for HOME grants, the dollar amount of these contracts, and whether the contractors for the HOME projects report being a DBE, MBE, or WBE. For Plan Year 5, Commerce recorded no DBE or MBE prime or subcontractors and four WBE prime or subcontractors.

**Table 8 – Minority Business and Women Business Enterprises**

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	TOTAL	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Number	8					8
Dollar Amount	\$32,411,869.00					\$32,411,869.00
<b>Sub-Contracts</b>						
Number	38					38
Dollar Amount	\$6,400,494.33					\$6,400,494.33
	TOTAL	Women Business Enterprises	Male			
<b>Contracts</b>						
Number	8		8			
Dollar Amount	\$32,411,869.00		\$32,411,869.00			
<b>Sub-Contracts</b>						
Number	38	4	34			
Dollar Amount	\$6,400,494.33	\$1,074,678.33	\$5,325,816.00			

During Plan Year 5, Commerce received no report of any Minority Owner of Rental Property for housing grants. This is reflected in Table 9 – Minority Owners of Rental Property below.

**Table 9 – Minority Owners of Rental Property**

<b>Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted</b>						
	TOTAL	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

During Plan Year 5, 16 households were temporarily relocated because of rehabilitation activities. Relocation costs incurred during the program year totaled \$129,276.80. This information is reflected in Table 10 – Relocation and Real Property Acquisition. No parcels were acquired, no

businesses were displaced, and no nonprofit organizations were displaced. No households were displaced during the program year.

**Table 10 – Relocation and Real Property Acquisition**

<b>Relocation and Real Property Acquisition</b> – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired	0	\$0.00				
Businesses Displaced	0	\$0.00				
Nonprofit Organizations Displaced	0	\$0.00				
Households Temporarily Relocated, not Displaced	16	\$129,276.80				
Households Displaced	TOTAL	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	16	0	0	0	0	16
Cost	\$129,276.80	\$0.00	\$0.00	\$0.00	\$0.00	\$129,276.80

## CR-20 – Affordable Housing 91.520(b)

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

**Table 11 – Number of Households**

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	1,340	209
Number of non-homeless households to be provided affordable housing units	40	210
Number of special-needs* households to be provided affordable housing units	25	3
<b>Total**</b>	<b>1,405</b>	<b>419</b>

\*Special needs, for the purposes of this table, is defined as disabled, elderly, veteran, and HIV/AIDS households, or households that have been impacted by domestic violence.

\*\*These categories are not mutually exclusive; a household will be either homeless or non-homeless and may also be special needs.

**Table 12 – Number of Households Supported**

	One-Year Goal	Actual
Number of households supported through rental assistance	600	413
Number of households supported through the production of new units	2	3
Number of households supported through the rehab of existing units	4	2
Number of households supported through the acquisition of existing units	50	42
<b>Total</b>	<b>656</b>	<b>460</b>

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

CDBG, HOME, HTF, and ESG programs have made progress towards the goals and objectives identified in the 2015-2020 Consolidated Plan and 2019-2020 Annual Action Plan. Commerce awarded CDBG, HOME, and HTF funds during the 2019-2020 Annual Action Plan year to activities that, cumulatively, addressed all five goals. CDBG-funded activities provided critical assistance to 169,266 individuals or households through housing, infrastructure, public and community facilities, and economic development. HOME-funded activities provided critical affordable housing development and financing to 45 households. The number of households (Table 11) for

ESG, HOME, and CDBG was derived from DPHHS and Commerce internal tracking. The number of households supported (Table 12) for both HOME and CDBG was derived from the IDIS reports PR23 CDBG Sum of Actual Accomplishments by Activity Group and Accomplishment Type, and HOME Disbursements and Unit Completions. All owner and renter households assisted meet Title II of the Cranston-Gonzalez National Affordable Housing Act, as amended, Section 215 definition of affordable housing. ESG provided assistance to 833 individuals in 413 households. Helping an individual secure stable housing in order to prevent homelessness or rehouse someone who is literally homeless requires more than one-time support and more intensive case management. Therefore, ESG subrecipients are finding it necessary to spend more funds per client that is assisted than anticipated and are not able to help as many individuals as they had planned.

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

Internal and external measures to collect and report data will be completed in future action plans through modified subgrantee reporting processes from application submission through project completion. CDD will continue to improve grant processes to meet these goals and be successful at reporting the accomplishments of the CDBG, HOME, and HTF programs from each activity necessary to report on all goals and objectives identified in action plans. Additionally, action plans will properly transmit within the format prescribed through the electronic consolidated plan suite.

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

**Table 13A – Number of Households Served**

<b>Number of Households Served</b>	<b>CDBG Actual (Housing)</b>	<b>HOME Actual</b>	<b>HTF Actual</b>
Extremely Low-income	0	1	0
Low-income	1	12	0
Moderate-income	1	32	0
<b>Total</b>	<b>2</b>	<b>45</b>	<b>0</b>

**Table 13B – Number of Persons Served**

<b>Number of Persons Served</b>	<b>CDBG Actual (Non-Housing)</b>	<b>HOME Actual</b>	<b>HTF Actual</b>
Extremely Low-income	241		0
Low-income	11		0
Moderate-income	22		0
Non Low-income/Moderate-income	0		0
<b>Total</b>	<b>274</b>		<b>0</b>

***Narrative Information***

Commerce received approval of its HTF Allocation Plan, with which it addresses “worst case” needs, i.e., individuals who are homeless or at-risk of homelessness, extremely low-income seniors and persons with disabilities, and households who are rent-burdened or live in substandard housing. Commerce encourages all applicants to develop affordable housing that addresses the “worst case” needs; however, Commerce does not mandate the type or location of projects that are submitted. Commerce does accept applications, from all eligible entities, that are working to meet the highest and most critical housing needs of the selected area or community. During the plan year, Commerce accepted applications on November 22, 2019. Commerce awarded its third round of HTF grants for the following projects, utilizing all available HTF funds: Fire Tower Apartments in Helena for extremely low-income households, Red Adler in Helena for extremely low-income households, Southwinds Estate in Great Falls for extremely low-income seniors and disabled persons, Trinity Apartments in Missoula for providing permanent supportive housing for households experiencing homelessness, Grandview Apartments in Billings for extremely low-income adults with physical disabilities, and Oakwood Village Apartments in Havre for extremely low-income households. These project awards will specifically address those highest and most critical housing needs for families and individuals.

Table 13A – Number of Households Served and Table 13B – Number of Persons Served, report on the proposed number of beneficiaries served by CDBG, HOME, and HTF activities. Data was derived from the IDIS reports PR23 CDBG Summary of Accomplishments: CDBG Beneficiaries by Income Category and PR23 HOME Summary of Accomplishments: Home Unit Completions by Percent of Area Median Income. CDBG assisted 241 extremely low-income persons, 11 low-income persons, and 22 moderate-income persons, as well as 1 low-income household and 1 moderate-income household. HOME provided assistance to 1 extremely low-income household, 12 low-income households, and 32 households of moderate income. Because HTF projects have not yet been completed, there is not yet beneficiary data to report.

## *CR-25 – Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)*

*Evaluate the jurisdiction’s progress in meeting its specific objectives for reducing and ending homelessness through:*

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

### Outreach

DPHHS coordinates and aligns its goals for ESG with the efforts of the MT CoC. The continued role of the statewide CoC is critical in meeting the needs of the homeless population in Montana.

While MT CoC strives to meld and leverage programs and resources at the state level, it also strives to assure homeless persons can access these programs through effective, coordinated entry, case management and service delivery at the local level. It does so by encouraging strong community continuum of care organizations that bring all providers of homeless services together to identify needs, close gaps, coordinate client services across all programs, and to identify new and innovative approaches to eradicating homeless conditions.

Outreach, especially to the unsheltered, is being met primarily through the outreach activities of the state’s emergency shelters, the Supportive Services for Veteran Families (SSVF) program which now operates statewide, local Veteran groups, faith-based programs and the federally funded Project for Assistance in Transition from Homelessness (PATH) programs (but only in Billings, Butte, and Missoula). Coordinated Entry Systems across the state provide for uniform intake and assessment using the VI-SPDAT tools and case conferencing to score vulnerability levels and prioritize those most in need for available housing opportunities.

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

Emergency Shelter (ES): Unfortunately, the 2020 PIT numbers have not yet been released. As of January 2019, Montana had an estimated **1,357** experiencing homelessness on any given day, as reported by MT CoC to HUD. Of that total, **136** were family households, **205** were veterans, **82** were unaccompanied young adults (aged 18-24), and **228** were living in chronic homelessness. Last year, the 2019 PIT counted 27% fewer ES beds than in 2018 due, in part, to the closing of a

shelter in Butte that has since been reopened. This follows two consecutive years of modest increase in beds of 17% and 18%. While the statewide utilization of ES beds was 69%, utilization rates of shelters in the state's largest cities are often 100% or higher. The 2019 PIT counted a 5% decrease in the number of persons in Emergency Shelters following a 6% increase in ES stays the year before.

Transitional Housing (TH): With the loss of five CoC transitional housing programs in the 2015 competitive grant cycle, all CoC-TH has been replaced with Rapid Rehousing and one joint component TH-RRH project. The only transitional housing is now provided solely by domestic violence shelters, faith-based programs, Family Promise and VA GPD veteran grantees.

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

ESG funds are used for Homelessness prevention activities. 484 individuals were served with these funds.

All the housing programs are required to provide case management and assist clients in accessing cash benefits from mainstream programs that include: Supplemental Security Income, Social Security Disability Insurance, Veterans Disability, TANF, retirement and pensions or child support. These programs also assist clients to access non-cash mainstream benefits from Medicaid, Medicare, State children's health insurance, WIC, VA medical services, TANF childcare, temporary rental assistance, and Section 8 or other public rental assistance.

There are many vital programs providing other services to the homeless, such as:

\* Health Care for the Homeless (HCH) is a federally funded Health Resources and Services Administration (HRSA) program that provides temporary medical services to homeless individuals and families. There are two clinics in Billings and Missoula and six satellite service sites in Billings, Butte, and Helena.

\* The PATH program coordinates the SSI/SSDI Outreach, Access and Recovery (SOARS) training which helps all homeless case managers successfully assist homeless clients apply for SSI and SSDI assistance.

\* Volunteers of America, Billings, is a recent recipient of a Veterans Administration’s Supportive Services for Homeless Veteran Families grant which provides services and some rental assistance to veteran households in the Billings area.

\* The 10 Human Resource Development Councils provide a statewide network of no-wrong-door accessibility to homeless assistance, including short-term rental assistance, emergency shelter, food banks, and referral assistance to a myriad of other programs.

Discharged Persons from Public Institutions: Both the ESG and CoC Rapid Rehousing programs serve discharged persons. The MT CoC does not specifically target funding toward discharged persons, the ESG and CoC programs assist persons according to vulnerability assessments conducted during the Coordinated Entry System intake and assessment process.

The Montana Department of Corrections works with incarcerated individuals to develop individualized plans for the offender reentry. Efforts include connecting offenders with potential housing leads, engaging landlords, onsite reviews of potential housing opportunities to identify safe and supportive environments and networking with other community resources.

The Statewide Reentry Task Force reviews and compiles policy recommendations related to offender reentry. The DPHHS, the Human Resource Development Councils (HRDCs), and the Department of Corrections may partner and review solutions for increasing the effectiveness of reentry objectives related to stable housing, then bring their ideas to the Reentry Task Force for consideration. Statewide Reentry Task Force public policy recommendations are provided to the Law and Justice Interim Committee to create, where appropriate, supportive legislation.

*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*

The MT CoC, along with all other low-income organizations, continue to prioritize the severe shortage of affordable housing as the greatest need followed by the need for more federal—and state—funding of permanent supportive housing. To date, efforts to increase state funding through the legislature have not been successful and Congressional funding to HUD/CoC continues to be the sole resource.

Chronically Homeless (CH): As Coordinated Entry Systems become fully implemented, the focus on serving Chronic Homeless continues through the vulnerability assessment process provided in Coordinated Entry.

Rapid Rehousing (RRH): Since HUD implemented changes in the CoC grant competition encouraging TH projects to reallocate funds to RRH, the MT CoC has reallocated all TH projects to RRH or PSH. Rapid Rehousing grants now account for 31% of all CoC funding. Unfortunately, the 2020 PIT numbers have not yet been released. In 2019, The CoC counted 583 Rapid Rehousing beds filled on the night of the PIT which was 11% or 71 beds fewer than the previous year with 53% being CoC-RRH, 29% being ESG-RRH and 20% being SSVF-RRH.

Eligible applicants for all program components include states, local governments, other government agencies (such as public housing authorities), private nonprofit organizations, and community mental health associations that are public nonprofit organizations.

ESG funds are used for RRH activities; 349 individuals were served with these funds.

Permanent Supportive Housing: This component provides long-term housing with supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting. In 2019, Montana received about \$1.44 million in CoC-PSH grant funding which provided 268 PSH beds and another 563 beds. Beds provided with HOPWA funds are reported in the HOPWA APR since the State receives a competitive HOPWA award and not a formula grant.

Currently, neither TANF nor Medicaid are used to provide homeless housing assistance.

## **CR-30 – Public Housing 91.220(h); 91.320(j)**

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

HOME and HTF program funds were awarded to complete activities through public housing authorities (PHAs) in the state. No specific actions by CDBG were taken to address the needs of PHAs in the state, as no local governments applied on behalf of a PHA. During Plan Year 5, HTF funds were awarded to the Missoula Housing Authority (MHA) to construct Trinity, which will provide 130 homes, 30 of which will provide permanent supportive housing for households experiencing homelessness; additionally, HOME funds were awarded to MHA for construction of Villagio, which will provide homes for 200 households.

Commerce and Public Health and Human Services have completed the 2015-2020 Analysis of Impediments to Fair Housing Choice and continues to work with a vast array of public entities and key stakeholders, through various events and public meetings to create more clearly defined objectives. These objectives are the focus of action steps, currently being further refined, that can be used by entities and ultimately initiated at the local level. A collaboration agreement has been executed to complete a state-wide Affirmative Fair Housing (AFH) plan. The collaboration agreement includes PHAs across the state, as well as Commerce, DPHHS and the three entitlement communities. PHAs will continue to be invited to provide input and be involved with the development of this AFH process.

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

With every Homebuyer Assistance application that is reviewed and funded in the HOME Program, applicants must identify if the prospective homebuyer is coming from public housing. The Community Development and the Housing Divisions, within Commerce, work collaboratively to encourage LMI residents to attend Homebuyer Education courses offered throughout the state by various qualified agencies. These courses are advertised across the state at the various PHAs, with key partner agencies, and through a multi-media approach to increase the awareness of their availability.

Additionally, as the Consolidated Plan documents and AFH are developed and made available to the public, through meetings, surveys, or other activities, the state will encourage PHA residents to participate in the development of these resources. Currently, the Consolidated Plan

documents are made available at various repositories where PHA residents are likely to seek services. Additional details will be provided during the next program year as the AFH public participation activities are carried out.

*Actions taken to provide assistance to troubled PHAs*

HOME and HTF program funds were awarded to complete activities through PHAs in the state, however, beyond the specific project activities listed in the activity award table (Table CR05-A) for HOME and HTF, no specific actions by CDBG were taken to address the needs of public housing authorities in the state. The HOME, HTF, and CDBG programs have not identified a troubled PHA during Plan Year 5, therefore no actions to provide assistance were developed.

## **CR-35 – Other Actions 91.220(j)-(k); 91.320(i)-(j)**

*Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220(j); 91.320(i)*

Commerce administers the Community Technical Assistance Program (CTAP). CTAP provides direct technical assistance to local governments and elected officials, land use planners, associated professionals and members of the public on issues related to land use planning and development throughout the state. CTAP is currently completing an update of its model subdivision regulations, which will be distributed to cities and counties throughout Montana for adoption. These model regulations promote affordable housing and support resilient community and economic development.

Through CDBG funding, local communities can prepare or update various planning documents, including comprehensive land use planning, including zoning, subdivision, and annexation regulations in support of the amelioration of barriers to affordable housing. CDBG Planning Grant guidelines continue to promote community resiliency, including the development and preservation of an affordable, reliable housing stock.

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

All the activities funded under the CDBG, HOME, HTF and ESG programs addressed obstacles to meeting underserved needs. CDBG, HOME, and HTF all promote projects that align with the resiliency goals set forth by CDD which include projects aimed at strengthening local independence, stability, and sense of community.

During Plan Year 5, the CDBG, HOME, and HTF programs awarded grants to projects that will provide clean, safe, affordable, decent, and sanitary housing for special needs populations. These projects include:

- New construction of Trinity, a 201-unit rental development by the Missoula Housing Authority and Homeward, Inc., which will provide 30 permanent supportive homes for homeless households;
- Rehabilitation of elevators at two of Accessible Space’s properties, Southwinds Estate and Grandview Apartments, which house seniors and disabled persons;

- New construction of See Them Home Family Housing Center, a development by Missoula County with 13 rooms to shelter victims of domestic violence, 25 housing rooms for homeless families, and overflow space to accommodate an additional 6 families; and
- Construction and updates by Rosebud County to bring a school into compliance with ADA.

Coordinated Entry Systems across the state provide for uniform intake and assessment of ESG and partnering programs using the VI-SPDAT tools and case conferencing to score vulnerability levels and prioritize those most in need for available housing opportunities.

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

Commerce uses HOME, HTF, and CDBG funds to support acquisition and rehabilitation activities to ensure that households, particularly those with children, benefit from federal housing programs that practice proper lead-based paint (LBP) protocols and comply with current requirements of Title X of the Residential Lead Based Paint Hazard Reduction Act of 1992. Both Commerce and DPHHS provide education and information on LBP hazards to parents, families, healthcare providers, grant recipients, and contractors. Commerce requires that any contractor or subcontractor engaged in renovation, repair, and/or paint activities that disturb LBP in homes, and childcare facilities built before 1978 must be certified and follow specific work practices to prevent lead contamination. In addition to complying with LBP regulations, Uniform Physical Condition Standards (UPCS) inspections will be performed at rental properties assisted with HTF, HOME, and CDBG, as well as Section 8 rental properties throughout the state.

The Community Development and Housing Divisions added HUD’s on-line Lead-Based Paint Visual Assessment Training to its employee on-boarding process to ensure that all staff involved in the funding of housing projects through Commerce are trained in identifying deteriorated paint and awareness increased risk of the presence of LBP hazards.

Units that ESG-eligible households live in must adhere to LBP requirements as set forth by HUD.

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

Commerce and DPHHS, in coordination with non-profit organizations and the private sector, helped individuals and families in poverty by supporting local and regional efforts to improve family and individual incomes. All the strategies and priorities identified in the 2015-2020 Consolidated Plan targeted the improvement of economic conditions of Montanans of lower income, from the rehabilitation and construction of affordable housing, provision of homebuyer assistance, and the availability of temporary shelter services to investment in compact walkable

development where efficiencies of public infrastructure, community services, and employment center encourage healthy, vital, and resilient communities. Additionally, all CDBG housing, public and community facilities, and economic development projects indirectly support reducing poverty-level families.

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

Gaps in the institutional delivery system exist primarily due to funding limitations that are outside the control of the State of Montana. CDBG, HOME, HTF, and ESG resources are inadequate to meet the needs of Montanans of low-moderate income, with special needs, or experiencing homelessness. However, effectively relaying information regarding grant opportunities and technical assistance from the State of Montana to eligible entities continues to be one of the State's greatest challenges. These are areas of opportunity for increased collaboration across and between agencies, organizations, and the private sector to ensure that services are delivered to the greatest number of eligible entities and individuals in the state. As an example, during the 2019-2020 Annual Action Plan year, the State actively engaged with the entitlement communities to begin work on the development of the AFH to comprehensively address Fair Housing Choice in Montana. Lastly, CDD restructured its division to provide more transparent and resource-focused technical assistance and administration and support staff development to effectively support the needs of local governments, non-profit organizations, businesses and key stakeholders. CDD has four main teams to better coordinate resources and assistance: Community Planning, Housing Development, Infrastructure, and Community and Economic Vitality. These teams allow for staff to become subject matter experts and enable continued leveraging of federal, state, and local resources statewide.

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

As a part of the Consolidated Plan and certification process of the Analysis of Impediments to Fair Housing, Commerce coordinated with both public and private partners for continued discussions on the impediments to fair housing choice in Montana. Commerce coordinates with public and private partners to discuss current projects and methods to coordinate efforts throughout the state. Coordinated efforts occurred during the implementation and completion of many awarded project activities in providing planning grants, grants for public facilities, housing and infrastructure, while working toward reducing or eliminating impediments to Fair Housing choice in the state. DPHHS was represented on various social service state advisory groups to ensure coordination with social services for needy populations in Montana. DPHHS worked proactively

with its MT CoC partners to facilitate efficient and effective coordination of services between affordable housing and social service organizations.

Commerce and DPHHS have continued to work with a vast array of public entities and key stakeholders, through numerous public meetings to create more clearly defined objectives to Affirmative Further Fair Housing. These objectives are the focus of action steps, currently being further refined, that can be used by entities and ultimately initiated at the local level. Commerce and DPHHS are working closely with key stakeholders to engage participation between public and private housing and social service agencies and reduce impediments to fair housing choice.

The Analysis of Impediments (AI) Steering Committee is led by CDD staff and involves advocates from Commerce's Housing Division, DPHHS, Montana Fair Housing, Montana's Human Rights Bureau, and Helena's HUD representative. The Steering Committee ensures that the direction of the AI and AFH discussion moves towards addressing the action items, objectives, and measurable outcomes and that they are consistent with the 2015-2020 Analysis of Impediments to Fair Housing Choice in Montana.

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

Commerce and DPHHS are collaborating with a state-wide partnership that includes the three entitlement communities (Great Falls, Missoula and Billings) and the many public housing authorities across the state to begin development of a state-wide Affirmative Fair Housing plan. This plan will be developed and released for public comment according to the 2020-2024 5-year Consolidated Plan for all entities. Planning meetings have continued during this program year and will continue for the state-wide partnership to develop a state-wide approach to reducing or eliminating impediments to Fair Housing Choice through the Affirmative Fair Housing plan.

## CR-40 – Monitoring 91.220; 91.230

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

Commerce works closely with all grantees to ensure compliance with program requirements. The HOME, CDBG, and HTF programs continually evaluate and improve processes to ensure compliance with federal regulations. CDD program staff hold regular calls with grantees throughout the project to ensure that technical assistance is always available.

CDBG project activities are all monitored at least once during the project's scope of work. The monitoring includes a review of the grantee's project file, an inspection of the facility, and a review of the financial processes. CDD staff will notify the grantee and all relevant partners of the intended monitoring visit with ample notice to establish the monitoring date. If problems arise or technical assistance is needed, a project may be monitored more than once before closeout. After the project has been monitored, Commerce issues a monitoring letter, documenting any performance issues, concerns, or findings and relevant corrective actions.

HOME project activities are monitored twice during the project's scope of work. One monitoring includes a site-visit and a detailed desk audit of all relevant records and documents related to the project. The second monitoring includes a visit to the construction site at project completion to conduct UPCS inspections and ensure the project is prepared for closeout. HOME projects are then monitored during the first three years of the period of affordability with the first monitoring occurring within one year of project closeout per HUD regulations. These initial monitorings provide an opportunity for HOME program training and technical assistance with the grantee. After the first three years of the period of affordability, project monitoring occurs every one to three years depending on assessed risk.

During this program period, four CDBG projects, six HOME projects, and seven HTF projects were monitored during on-site visits. HTF projects monitored include Chapel Court, Cornerstone Apartments, Alpenglow, Meadowlark Vista, Cottonwood Creek, Hearthstone Apartments, and Red Alder. HOME projects monitored include Skyscape Duplexes, Bluebunch Flats, Copper Ridge Apartments, Nemont Manor, Roosevelt Villas, and West Mont Farm and Gardens. CDBG projects monitored include Town of Circle, Butte-Silver Bow County (two projects), and City of Shelby. All projects mentioned in this paragraph were funded during previous program years but were

substantially complete or had begun construction during this program year and were monitored by Commerce staff.

All 10 ESG subrecipients were monitored during on-site visits. Monitoring activities completed for the HOPWA Program are reported in the HOPWA APR since the State receives a competitive HOPWA award and not a formula grant.

### ***Citizen Participation Plan 91.105(d); 91.115(d)***

#### ***Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports***

Commerce announces the availability of draft documents through a listserv of approximately 1,500 individuals, towns, counties, non-profits, and interested parties. The draft documents are available electronically on the Commerce website. There are 22 organizations across Montana that have also agreed to be a repository for all draft documents through the 2015-2020 Consolidated Plan period for all relevant draft documents including each year's Annual Action Plan (including any amendments) and the CAPER (including any amendments). Each repository was mailed a physical copy of the draft document to help make it available for public review during the relevant comment periods. Physical copies of the draft document were also made available to the public upon request. Citizens were invited to comment on draft documents via oral testimony during a virtual public hearing, via email, or letter to Commerce. If a citizen requests an alternative form of the draft documents, then Commerce makes all reasonable efforts to comply with the request.

The public comment period for the Draft 2019-2020 CAPER began July 19, 2020, and ended August 4, 2020. A virtual public hearing was held July 28, 2020. The public hearing was announced through the Commerce website, listserv, and multiple newspapers across the state. The draft document was physically accessible at the 22 repositories across the state, electronically accessible on the Commerce website, and available upon request. Once the public comment period ended, a record of the public hearing transcript was made available through the Commerce website (URL below). Comments considered and responses provided are included in Appendix A of this document.

<http://commerce.mt.gov/conplan>.

**CR-45 – CDBG 91.520(c)**

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

There have not been any changes in Commerce’s program objectives during the 2019-2020 Annual Action Plan year.

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

No.

*[BEDI grantees] Describe accomplishments and program outcomes during the last year.*

N/A

## **CR-50 – HOME 91.520(d)**

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

Thirty-seven (37) properties were scheduled and 34 properties were monitored during the 2019-2020 Plan Year. Of all 37 monitoring appointments, 3 were cancelled or not scheduled due to concerns over transmission of the novel Coronavirus (COVID-19). As allowed by HUD's memorandum dated April 10, 2020, which outlines waivers available under the HOME program in response to the COVID-19 pandemic, Commerce will delay the inspection of its remaining three properties until it is determined that staff, property management, and property residents can participate in an inspection safely. See Appendix B for a table of projects monitored between April 1, 2019, and March 31, 2020; dates monitored, issues noted, and compliance status are provided as part of the table. These projects were funded previously with HOME funds and are currently in their period of affordability (POA). Commerce will continue to monitor the projects while they are in their POA. Each monitoring visit includes inspection of HOME-assisted units and review of the HOME-assisted tenant files to verify source documentation, income eligibility, and rent limits.

Additionally, as described in CR-40, HOME projects under construction are monitored two or more times during the grant period. At least one construction site visit is conducted and one full monitoring visit, which includes a full review of the grantee file and inspection of the HOME-assisted project and units. The HOME Program also coordinates with other funding agencies (when applicable) to communicate any issues or concerns regarding the project during construction.

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

Commerce reviews all Affirmative Fair Housing Marketing Plans (AFHMP) for HOME-assisted projects. Each project with five (5) or more HOME-assisted units is required to complete and submit an AFHMP for review and approval. During the Annual Rental Certifications, Commerce requests all updated documentation is submitted and kept in project records. Commerce provides technical assistance for updating AFHMP to grantees and property owners/managers during the construction phase and on an ongoing basis during the POA.

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

CDBG program income was receipted and expended during Plan Year 5. The \$60,000.00 in CDBG funds from an Economic Development grant to Lincoln County was receipted and expended on CDBG eligible activities during Plan Year 5. According to the IDIS report PR09, HOME began the program year with \$0.00 in program income, received \$923,065.11 in program income during the program year and expended \$923,065.11. The balance of program income was \$0.00.

*Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)*

CDD and the Housing Division, which administers the LIHTC program, have been working together through increased communications, meetings, and projects to continue fostering and maintaining affordable housing in Montana. LIHTC is often a leveraged funding source for HOME, HTF, and CDBG projects. This coordination has increased the communication with our grantees and other possible interested parties regarding the HOME Program and the opportunities that it provides. Additionally, during Plan Year 5 the HOME and LIHTC programs have reviewed monitoring results on blended projects to ensure both programs are aware of any potential issues and can follow-up on identified deficiencies during the next onsite monitoring, regardless of the funding source.

## CR-55 – HOPWA 91.520(e)

### *Identify the number of individuals assisted and the types of assistance provided*

The number of individuals assisted and the types of assistance provided under the HOPWA Program are reported in the HOPWA APR since the State receives a competitive HOPWA award and not a formula grant.

**Table 14 – HOPWA Number of Households Served**

<b>Number of Households Served Through:</b>	<b>One-Year Goal</b>	<b>Actual</b>
Short-term rent, mortgage, and utility assistance payments		
Tenant-based rental assistance		
Units provided in transitional housing facilities developed, leased, or operated with HOPWA funds		
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds		
<b>Total</b>		

### *Narrative*

Because the State of Montana’s HOPWA funds are provided via competitive award and not through a formula grant, HOPWA data is not included in Table 14. HOPWA data for competitive awards is presented in a separate report, the HOPWA APR.

**CR-56 – HTF 91.520(h)**

*Describe the extent to which the grantee complied with its approved HTF allocation plan and the requirements of 24 CFR part 93.*

As detailed in the approved 2019-2020 Annual Action Plan, Commerce set out to use its \$3,000,000 annual allocation and \$885,000 carryover for acquisition, demolition, reconstruction, and new construction to support the development and rehabilitation of rental housing. All activities meet the requirements of 24 CFR part 93.

**Table 15 – CR-56 HTF Units in HTF Activities Completed During the Period**

<b>Tenure Type</b>	<b>0 – 30% AMI</b>	<b>0% of 30+ to poverty line (when poverty line is higher than 30% AMI)</b>	<b>% of the higher of 30+ AMI or poverty line to 50% AMI</b>	<b>Total Occupied Units</b>	<b>Units Completed, Not Occupied</b>	<b>Total Completed Units</b>
Rental	0	0	0	0	0	0
Homebuyer*	0	0	0	0	0	0

\* Note: the approved Annual Action Plan outlines all HTF funds will be used for rental projects.

Although several HTF activities have been initiated since the 2017-2018 program year, no HTF activities have been completed to date.

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

**1. Recipient Information – All Recipients Complete**

Basic Grant Information

Recipient Name	MONTANA
Organizational DUNS Number	809790579
EIN/TIN Number	810302402
Identify the Field Office	DENVER
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

ESG Contact Name

Prefix	Ms.
First Name	Sara
Middle Name	
Last Name	Loewen
Suffix	
Title	Bureau Chief

ESG Contact Address

Street Address 1	1400 Carter Drive
Street Address 1	
City	Helena
State	MT
ZIP Code	59620
Phone Number	4064474265
Extension	
Fax Number	
Email Address	<a href="mailto:SLoewen@mt.gov">SLoewen@mt.gov</a>

ESG Secondary Contact

Prefix	Ms.
First Name	Marcia
Last Name	Lemon
Suffix	

Title	Energy and Community Services Program Manager
Phone Number	4064474276
Extension	
Email Address	<a href="mailto:mlemon@mt.gov">mlemon@mt.gov</a>

**2. Reporting Period – All Recipients Complete**

<b>Program Year Start Date</b>	<b>04/01/2019</b>
<b>Program Year End Date</b>	<b>03/31/2020</b>

**3a. Subrecipient Form – Complete one form for each subrecipient**

Subrecipient or Contractor Name	Northwest Montana Human Resources
City	Kalispell
State	MT
Zip Code	59903-1058
DUNS Number	
Is subrecipient a victim services provider	N
Subrecipient Organization Type	Other Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$109,095.91

Subrecipient or Contractor Name	HRDC of District IX, Inc.
City	Bozeman
State	MT
Zip Code	59715-6241
DUNS Number	
Is subrecipient a victim services provider	N
Subrecipient Organization Type	Other Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$69,184.22

Subrecipient or Contractor Name	Human Resources Development Council
City	Missoula
State	MT
Zip Code	59801-5763
DUNS Number	
Is subrecipient a victim services provider	N
Subrecipient Organization Type	Other Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$118,560.41

Subrecipient or Contractor Name	Action Inc - Human Resources Council District XII
City	Butte
State	MT
Zip Code	59701-9362
DUNS Number	
Is subrecipient a victim services provider	N

Subrecipient Organization Type	Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$47,581.30

Subrecipient or Contractor Name	Rocky Mountain Development Council, Inc.
City	Helena
State	MT
Zip Code	59624-1717
DUNS Number	
Is subrecipient a victim services provider	N
Subrecipient Organization Type	Other Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$41,249.00

Subrecipient or Contractor Name	District IV HRDC
City	Havre
State	MT
Zip Code	59501-4960
DUNS Number	
Is subrecipient a victim services provider	N
Subrecipient Organization Type	Other Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$22,715.23

Subrecipient or Contractor Name	Action for Eastern Montana
City	Glendive
State	MT
Zip Code	59330-1309
DUNS Number	
Is subrecipient a victim services provider	N
Subrecipient Organization Type	Other Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$3,631.72

Subrecipient or Contractor Name	HRDC District 7
City	Billings
State	MT
Zip Code	59101-2114
DUNS Number	
Is subrecipient a victim services provider	N
Subrecipient Organization Type	Other Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$104,965.60

Subrecipient or Contractor Name	District 6 - HRDC VI
City	Lewistown
State	MT
Zip Code	59457-1700
DUNS Number	
Is subrecipient a victim services provider	N
Subrecipient Organization Type	Other Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$20,972.12

Subrecipient or Contractor Name	Opportunities Incorporated
City	Great Falls
State	MT
Zip Code	59401-2605
DUNS Number	
Is subrecipient a victim services provider	N
Subrecipient Organization Type	Other Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$80,863.10

## CR-65 – Persons Assisted

### 4. Persons Served

Not applicable to ESG. Data uploaded to Sage.  
Attached eCart file to CR-00.

#### 4a. Complete for Homelessness Prevention Activities

**Table 16 – Household Information for Homeless Prevention Activities**

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

#### 4b. Complete for Rapid Re-Housing Activities

**Table 17 – Household Information for Rapid Re-Housing Activities**

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

#### 4c. Complete for Shelter

**Table 18 – Shelter Information**

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

**4d. Street Outreach**

**Table 19 – Household Information for Street Outreach**

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

**4e. Totals for all Persons Served with ESG**

**Table 20 – Household Information for Persons Served with ESG**

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

**5. Gender – Complete for All Activities**

**Table 21 – Gender Information**

	Total
Male	
Female	
Transgender	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

**6. Age – Complete for All Activities**

**Table 22 – Age Information**

	Total
Under 18	
18-24	
25 and over	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

7. Special Populations Served – Complete for All Activities

Table 23 – Special Population Served

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans				
Victims of Domestic Violence				
Elderly				
HIV/AIDS				
Chronically Homeless				
<b>Persons with Disabilities:</b>				
Severely Mentally Ill				
Chronic Substance Abuse				
Other Disability				
Total (unduplicated if possible)				

**10. Shelter Utilization**

**Table 24 – Shelter Capacity**

Number of New Units – Rehabbed	0
Number of New Units – Conversion	0
Total Number of beds – nights available	4,745
Total Number of beds – nights provided	951
Capacity Utilization	20%
Total Persons Served (unduplicated)	51

**11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)**

Agencies receiving ESG funds have continued to focus funding on Rapid Rehousing and Homeless Prevention activities as directed by the MT CoC’s Strategic Plan. There is only one agency that allocated to Shelter Services: District IV Human Resource Development Council (funds Shelter Operation and Essential Services).

## CR-75 – Expenditures

### 11. Expenditures

#### 11a. ESG Expenditures for Homelessness Prevention

**Table 25 – ESG Expenditures for Homelessness Prevention**

Dollar Amount of Expenditures in Program Year			
	2017	2018	2019
Expenditures for Rental Assistance	\$0.00	\$42,224.90	\$89,185.88
Expenditures for Housing Relocation and Stabilization Services – Financial Assistance	\$0.00	\$12,616.46	\$25,850.00
Expenditures for Housing Relocation & Stabilization Services – Services	\$0.00	\$22,935.23	\$63,854.40
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	\$0.00	\$0.00	\$0.00
<b>Subtotal Homelessness Prevention</b>	<b>\$0.00</b>	<b>\$77,776.59</b>	<b>\$178,890.28</b>

#### 11b. ESG Expenditures for Rapid Re-Housing

**Table 26 – ESG Expenditures for Rapid Re-Housing**

Dollar Amount of Expenditures in Program Year			
	2017	2018	2019
Expenditures for Rental Assistance	\$0.00	\$41,988.55	\$39,548.26
Expenditures for Housing Relocation and Stabilization Services – Financial Assistance	\$0.00	\$45,700.84	\$70,508.00
Expenditures for Housing Relocation & Stabilization Services – Services	\$0.00	\$41,444.85	\$78,303.34
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	\$0.00	\$0.00	\$0.00
<b>Subtotal Rapid Re-Housing</b>	<b>\$0.00</b>	<b>\$129,134.24</b>	<b>\$188,359.60</b>

**11c. ESG Expenditures for Emergency Shelter**

**Table 27 – ESG Expenditures for Emergency Shelter**

<b>Dollar Amount of Expenditures in Program Year</b>			
	<b>2017</b>	<b>2018</b>	<b>2019</b>
Essential Services	\$0.00	\$0.00	\$2,372.54
Operations	\$0.00	\$2,000.00	\$2,710.00
Renovation	\$0.00	\$0.00	\$0.00
Major Rehab	\$0.00	\$0.00	\$0.00
Conversion	\$0.00	\$0.00	\$0.00
<b>Subtotal</b>	<b>\$0.00</b>	<b>\$2,000.00</b>	<b>\$5,082.54</b>

**11d. Other Grant Expenditures**

**Table 28 – Other Grant Expenditures**

<b>Dollar Amount of Expenditures in Program Year</b>			
	<b>2017</b>	<b>2018</b>	<b>2019</b>
Street Outreach	\$0.00	\$0.00	\$1,241.08
HMIS	\$0.00	\$76,479.90	\$18,700.00
Administration	\$0.00	\$13,090.25	\$29,671.01

**11e. Total ESG Grant Funds**

**Table 29 – Total ESG Funds Expended**

<b>Total ESG Funds Expended</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
	<b>\$0.00</b>	<b>\$298,480.98</b>	<b>\$421,945.01</b>

**11f. Match Source**

**Table 30 – Other Funds Expended on Eligible ESG Activities**

	<b>2017</b>	<b>2018</b>	<b>2019</b>
Other Non-ESG HUD Funds	\$0.00	\$38,217.23	\$144,476.88
Other Federal Funds	\$0.00	\$10,209.92	\$188,639.49
State Government	\$0.00	\$0.00	\$0.00
Local Government	\$0.00	\$67,292.37	\$94,470.87
Private Funds	\$0.00	\$157,534.05	\$254,824.62
Other	\$0.00	\$4,753.58	\$0.00
Fees	\$0.00	\$0.00	\$0.00
Program Income	\$0.00	\$1,211.00	\$0.00
<b>Total Match Amount</b>	<b>\$0.00</b>	<b>\$279,218.15</b>	<b>\$682,411.86</b>

**11g. Total**

**Table 31 – Total Amount of Funds Expended on ESG Activities**

<b>Total Amount of Funds Expended on ESG Activities</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
	\$0.00	\$577,699.13	\$1,104,356.87