



2024-2025 Consolidated Annual Performance Evaluation Report

Montana Department of Commerce

April 1, 2025

2020-2024 Montana Consolidated Plan for Housing and Community Development

Plan Year 1 (2020)	April 1, 2020 – March 31, 2021
Plan Year 2 (2021)	April 1, 2021 – March 31, 2022
Plan Year 3 (2022)	April 1, 2022 – March 31, 2023
Plan Year 4 (2023)	April 1, 2023 – March 31, 2024
Plan Year 5 (2024)	April 1, 2023 – March 31, 2025

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Introduction

The Montana Departments of Commerce and Public Health and Human Services receive annual U.S. Department of Housing and Urban Development funding for the following Community Planning and Development programs: Community Development Block Grant, HOME Investment Partnerships Program, Emergency Solutions Grant, and National Housing Trust Fund. In addition, Commerce has received one-time only allocations for the Community Development Block Grant – CARES Act and HOME – American Rescue Plan Act programs. Funding through these programs is crucial to organizations struggling to obtain scarce funding to serve households at or below 80% of area median income. As demonstrated in this 2024-2025 Consolidated Annual Performance and Evaluation Report, these programs have been critical funding sources for constructing senior and health facilities in rural areas; developing housing facilities to assist disadvantaged populations; supporting economic opportunities for low- and moderate-income beneficiaries; and providing clean water and sanitary sewer to support the growth of vital, resilient communities across Montana.

Montana's CAPER reports to HUD the outcomes of activities completed with the resources made available to the state through CDBG, HOME, ESG, and HTF programs during Plan Year 5 (April 1, 2024, to March 31, 2025), which falls under the 2020-2024 Montana Consolidated Plan for Housing and Community Development and the 2024-2025 Annual Action Plan. CDBG-CV and HOME-ARP funds were not made available to the state during Plan Year 5, but during Plan Years 1 and 2, respectively.

The Consolidated Plan and AAP fulfill three basic goals in Montana: provide decent housing, provide a suitable living environment, and expand economic opportunities. The 2024-2025 AAP outlines the actions Montana proposed to take during Plan Year 5 to support these basic goals and the strategic goals identified in the 2020-2024 Consolidated Plan. The CAPER identifies the accomplishments of the CDBG, CDBG-CV, HOME, ESG, and HTF programs and compares them with the goals and objectives

put forth in the Consolidated Plan and AAP. The majority of HOME-ARP funds were awarded to four organizations across Montana during Plan Year 4, and the remaining HOME-ARP funds were awarded to two additional communities during Plan Year 5. Two of the projects are underway, while the remaining will start activities summer 2025.

Much of the information relevant to the 2020-2024 Consolidated Plan is reported in HUD's Integrated Data Information System, which interfaces with HUD's 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. Montana augments some of HUD's data, when necessary, to report additional program accomplishments or provide detail not available in IDIS. The 2024-2025 CAPER is the fifth and final CAPER provided for the 2020-2024 Consolidated Plan and is in the eCon Planning Suite format prescribed by HUD.

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, including the annual CDBG Performance Evaluation Reports, are available on [Commerce's Consolidated Plan Documents page](#) 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 2020-2024 Consolidated Plan and 2024-2025 AAP established five goals for the CDBG, HOME, HTF, and ESG programs:

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

Table CR-1A shows planned funding allocations, by program, for each of these goals. Table CR-1B shows actual awards, by program, for each of these goals. Table CR-1C shows actual expenditures, by program, for each of these goals.

Table CR-1A – Plan Year 5 Funding Allocations

Program	Goal										Admin	
	Preserve and Construct Affordable Housing		Plan for Communities		Improve and Sustain Vital Public Infrastructure		Revitalize Local Economies		Reduce Homelessness			
CDBG	\$1,150,000.00	19%	\$600,000.00	10%	\$2,587,331.00	42%	\$1,050,000.00	17%	\$500,000.00	8%	\$285,175.00	4%
HOME	\$2,700,000.00	90%	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$300,000.00	10%
ESG	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$684,864.56	92%	\$59,553.44	8%
HTF	\$2,080,350.00	66%	\$0	0%	\$0	0%	\$0	0%	\$750,000.37	24%	\$313,483.00	10%

Source: 2024-2025 AAP


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Table CR-1B – Plan Year 5 Awards

Program	Goal										Admin
	Preserve and Construct Affordable Housing		Plan for Communities		Improve and Sustain Vital Public Infrastructure		Revitalize Local Economies		Reduce Homelessness		
CDBG	\$0	0%	\$870,247	18%	\$3,400,000	71%	\$525,000	11%	\$0	0%	N/A
HOME	\$1,552,000	100%	\$0	0%	\$0	0%	\$0	0%	\$0	0%	
ESG	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$744,418	100%	
HTF	\$1,933,200	100%	\$0	0%	\$0	0%	\$0	0%	\$0	0%	
HOME-ARP	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$3,154,291	100%	N/A

Source: Commerce Application Logs

Table CR-1C – Plan Year 5 Funding Expenditures

Program	Goal										Admin	
	Preserve and Construct Affordable Housing		Plan for Communities		Improve and Sustain Vital Public Infrastructure		Revitalize Local Economies		Reduce Homelessness			
CDBG	\$412,723.53	5%	\$805,778.58	10%	\$5,383,976.50	65%	\$868,198.15	10%	\$783,284.79	9%	\$76,449.70	1%
CDBG-CV	\$923,605.41	28%	\$0	0%	\$894,763.12	27%	\$0	0%	\$1,270,719.62	39%	\$187,974.74	6%
HOME	\$5,854,795.44	79%	\$0	0%	\$0	0%	\$0	0%	\$1,216,252.82	17%	\$321,611.07	4%


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HOME-ARP	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$1,618,499.86	93%	\$121,033.09	7%
ESG	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$686,264.00	93%	\$54,936.00	7%
HTF	\$4,667,366.12	72%	\$0	0%	\$0	0%	\$0	0%	\$1,372,000.00	21%	\$448,840.83	7%

Source: IDIS Report PR23 – CDBG Summary of Accomplishments; IDIS Report PR23 – CDBG-CV Summary of Accomplishments; IDIS Report PR07 – Drawdown Report by Voucher Number – All Vouchers; DPHHS.

*Included in the CDBG and CDBG-CV Admin figures, is \$51,379.09 of CDBG funds and \$1,475.46 of CDBG-CV funds that were used to provide technical assistance to grantees.

*ESG expenditures during Plan Year 5 are from FY23 ESG funds for \$741,200 and reported in SAGE.

Projects are generally funded in one plan year and have expenditures recorded in a subsequent plan year because construction activities typically begin 12 to 15 months after award, and once construction commences, grant expenditures may not occur immediately.

Expenditures for Plan Year 5 for CDBG, HOME, HTF, and ESG totaled \$22,952,477.53. Expenditures for Plan Year 5 for one-time grants (CDBG-CV and HOME-ARP) were \$5,016,595.84. The first goal, Preserve and Construct Affordable Housing, expended \$11,858,490.50 in CDBG, CDBG-CV, HOME, and HTF resources to assist eligible households across the state through development and rehabilitation of rental properties and owner-occupied homes, as well as down payment assistance. The second goal, Plan for Communities, expended \$805,778.58 in CDBG resources to support local governments with long-range planning activities to address various land use and project specific needs across the state. The third goal, Improve and Sustain Public Infrastructure, expended \$6,278,739.62 in CDBG and CDBG-CV resources to assist eligible Montana communities with new or improved access to vital public infrastructure and community facilities. The fourth goal, Revitalize Local Economies, expended \$868,198.15 in CDBG resources to create or retain jobs and benefit eligible businesses. The final goal, Reduce Homelessness, expended \$6,947,021.09 in CDBG, CDBG-CV, HOME, HOME-ARP, ESG, and HTF resources. The remaining \$1,210,845.43, or 4%, of funds was spent on program administration.

ESG assisted 1,589 individuals, spending \$328,804.57 to serve 324 individuals through homeless prevention activities and \$294,278.08 to serve 347 individuals through rapid rehousing activities including case management, rental assistance, rental arrears, security deposit payments, and other housing relocation and stabilization services. ESG subrecipients spent \$13,999.98 to assist shelters, serving 771 individuals through operations support; and spent \$30,480.85 to assist 147 individuals through street

outreach activities. ESG subrecipients have set up their coordinated entry systems and are using ESG in combination with other funds to cover expenses. The state spent \$18,700.52 for access to HMIS for state staff and ESG subrecipients.

In addition to expending program funds in support of existing projects, Commerce also awarded program funds to several new projects.

The state received 45 applications from 44 applicants for the 2024 CDBG application cycle, and CDBG funding was awarded to 30 projects. The state received seven applications for the 2024 HOME application cycle, and HOME funding was awarded to three projects in November and December 2024. The state received seven applications for the 2024 HTF application cycle, two of which received HTF awards.

The state's HOME-ARP Allocation Plan was approved by HUD in April 2023. The first round of HOME-ARP applications were accepted through October 2023 with \$7,159,501 in HOME-ARP funds awarded to four applicants in December 2023. The second round of HOME-ARP applications were accepted through April 2024 with \$3,185,000 awarded to two additional projects. All HOME-ARP funds have been awarded and nearly one third is under contract.

Applicants for CDBG, HTF, HOME, and HOME-ARP funding in Plan Year 5 are presented in Table CR-2.


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Table CR-2 – Applicants for CDBG, HOME, HOME-ARP, and HTF Funding in Plan Year 5

Applicant	CDBG					HTF	HOME	HOME-ARP
	Planning	Housing	Public Facilities	Community Facilities	Economic Development			
Custer County	X							
Town of Jordan	X							
Town of Big Sandy	X							
City of Roundup	X							
Town of Cascade	X							
City of Scobey	X							
Carbon County	X							
City of Red Lodge	X							
City of East Helena	X							
City of Townsend	X							
Dawson County	X							
Town of Clyde Park	X							
Musselshell County	X							


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Applicant	CDBG					HTF	HOME	HOME- ARP
	Planning	Housing	Public Facilities	Community Facilities	Economic Development			
Powell County	X							
Park County	X							
Town of Fairview	X							
City of Sidney	X							
Town of Geraldine	X							
Richland County	X							
Big Horn County	X							
Golden Valley County	X							
Cascade County	X							
City of Livingston	X							
Powell County	X							
Thompson Falls	X							
Town of Plains	X							
Town of Bridger	X							
Town of Ennis	X		X					


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Applicant	CDBG					HTF	HOME	HOME-ARP
	Planning	Housing	Public Facilities	Community Facilities	Economic Development			
Mineral County	X							
Madison County			X					
Town of Shelby			X					
Town of Superior				X				
City of Wolf Point			X					
Lincoln County				X				
Town of Drummond			X					
City of Malta			X					
Town of Darby			X					
City of Ronan			X					
Town of St. Ignatius			X					
Town of Pinesdale			X					
City of Libby*			X					
Lake County*				X				
Basin*			X					


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Applicant	CDBG					HTF	HOME	HOME- ARP
	Planning	Housing	Public Facilities	Community Facilities	Economic Development			
City of Helena					X			
ASI – Eagle Watch Estates							X	
ASI – Summerwood Apts							X	
Belgrade Senior Housing						X		
Hardin Senior Housing						X		
Hidden Creek						X		
Homestead						X		
HomeFront – LB Lofts / Laurel Gardens						X	X	
HRDC 9 – Colorado Apts							X	
HRDC 9 – Gardiner Comm. Housing							X	
HRDC 9 – Rocky Mountain Flats						X	X	
Liberty Senior Housing						X		
Skyview Residences LLLP							X	


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Applicant	CDBG					HTF	HOME	HOME- ARP
	Planning	Housing	Public Facilities	Community Facilities	Economic Development			
Family Promise of Gallatin Valley - Journey Home								X
Crow Tribe - Western Motel Rehab								X
Samaritan House Family Living								X
Poverello Center - Housing Montana Heroes								X
NADC Recovery Residence								X

Source: Commerce Application Logs; * = Ineligible applicants

Applicants often use CDBG, HOME, and HTF funds in combination with other federal, state, and local funds. Proposed projects align with community needs and address priorities identified in long-range plans. Commerce does not dictate which applicants apply or which projects are proposed; all applications are considered and ranked, and eligible projects are awarded funding based on their ranking score and funding availability.

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.

Commerce does not prescribe the location or type of CDBG, HOME, and HTF projects that applicants submit; therefore, some goals may not be addressed in a specific plan year if applications are lacking or if proposed projects are not ultimately funded. Additionally, CDBG, HOME, and HTF projects generally take 2 to 4 years to complete; thus, expenditures for these programs may be reported in one plan year while associated accomplishments are reported in another. Because applications to be received and rankings to be determined are unknown, and because project completion dates are often difficult to predict, Commerce anticipates outcomes based on historical data. Due to these challenges, proposed outcomes may not align with actual outcomes. Table 1 shows both current and cumulative accomplishment data for the 2020-2024 Consolidated Plan period.

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

Goal	Category	Source/Amount		Indicator	Unit of Measure	All Program Years (To Date)			Current Program Year		
		All Program Years	Current Program Year			Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Preserve and Construct Affordable Housing	Affordable Housing	CDBG: \$4,000,000 HOME: \$11,500,000 HTF: \$10,000,00	CDBG: \$1,150,000 HOME: \$2,700,000 HTF: \$2,080,350	Rental Units Constructed	Household Housing Unit	60	145	242%	12	18	150%
				Rental Units Rehabilitated	Household Housing Unit	130	292	224%	18	31	172%
				Homeowner Housing Added	Household Housing Unit	10	0	0%	2	0	0%
				Homeowner Housing Rehabilitated	Household Housing Unit	15	7	47%	3	1	33%
				Direct Financial Assistance to Homebuyers	Households Assisted	250	77	30%	10	14	140%
Plan for Communities	Non-Housing Community Development	CDBG: \$2,500,000	CDBG: \$600,000	Other	Other: Local Governments Assisted	75	129	172%	15	33	220%
Improve and Sustain Public Infrastructure	Non-Housing Community Development	CDBG: \$13,000,000	CDBG: \$3,244,858	Public Facility or Infrastructure Activities Other than Low/Moderate	Persons Assisted	5,000	65,731	1,314%	1000	18,689	1,868%


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Goal	Category	Source/Amount		Indicator	Unit of Measure	All Program Years (To Date)			Current Program Year		
		All Program Years	Current Program Year			Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
				Income Housing Benefit							
				Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	100	0	0%	20	0	0%
Revitalize Local Economies	Non-Housing Community Development	CDBG: \$10,000,000	CDBG: \$600,000	Façade Treatment / Business Building Rehabilitation	Businesses	5	0	0%	1	0	0%
				Jobs Created / Retained	Jobs	250	120	48%	50	20	40%
				Businesses Assisted	Businesses Assisted	20	6	30%	3	1	33%
Reduce Homelessness	Homeless	CDBG: \$2,500,000 HOME:	CDBG: \$500,000 HOME:	Tenant-based Rental Assistance /	Households Assisted	1,000	749	74%	200	246	123%

Goal	Category	Source/Amount		Indicator	Unit of Measure	All Program Years (To Date)			Current Program Year		
		All Program Years	Current Program Year			Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
		\$2,500,000	\$0	Rapid Rehousing							
		HTF: \$3,500,000	HTF: \$750,000.37	Homeless Person Overnight Shelter	Persons Assisted	400	4558	1139%	350	771	220%
		ESG: \$3,500,000	ESG: \$686,264 \$685,610	Homelessness Prevention	Persons Assisted	2,400	1062	44%	170	324	190%
				Housing for Homeless Added	Household Housing Unit	100	140	140%	20	8	40%

Source: IDIS Report PR23 – CDBG Summary of Accomplishments; IDIS Report PR23 – HOME Summary of Accomplishments; IDIS Report PR105 – Status of HTF Activities; DPHHS; 2024-2025 AAP

See IDIS Report PR23 – CDBG-CV Summary of Accomplishments for a detailed accounting of CDBG-CV accomplishments across Goal categories.

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 2024-2025 AAP identified the following five goals:


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

As reflected in Table CR-3, the CDBG, HOME, and HTF programs funded and initiated projects throughout the state during Plan Year 5. These projects will assist communities with local efforts to preserve and construct affordable housing, plan for communities, improve and sustain public infrastructure, revitalize local economies, and reduce homelessness. Upon completion, all activities supported by program funds will benefit income-eligible households.

Table CR-3 includes the CDBG activities reported in the Timely Distribution Report, which is submitted to HUD annually.

Table CR-3 – Projects Awarded During Plan Year 5

Program	Applicant	County	Funds Awarded	Goal	Project Description
CDBG Public Facilities	Madison County	Madison	\$700,000	Improve and Sustain Vital Public Infrastructure	Upgrade wastewater treatment lagoons & irrigation system


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Program	Applicant	County	Funds Awarded	Goal	Project Description
CDBG Public Facilities	Town of Shelby	Toole	\$700,000	Improve and Sustain Vital Public Infrastructure	Install new pipes and rehabilitate wastewater system
CDBG Community Facilities	Town of Superior	Mineral	\$700,000	Improve and Sustain Vital Public Infrastructure	Construction of new Community Food Bank of Mineral County
CDBG Public Facilities	City of Wolf Point	Roosevelt	\$700,000	Improve and Sustain Vital Public Infrastructure	Wastewater collection system improvements
CDBG Community Facilities	Lincoln County	Lincoln	\$600,000	Improve and Sustain Vital Public Infrastructure	Rehabilitation of the Trego, Fortine, Stryker Community Hall
CDBG Planning	Town of Hysham	Treasure	\$50,000	Planning for Communities	Comprehensive School Facility


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Program	Applicant	County	Funds Awarded	Goal	Project Description
					Master Plan and PAR
CDBG Planning	City of Lewistown	Fergus	\$50,000	Planning for Communities	PAR and Library Master Plan
CDBG Planning	City of Hardin	Big Horn	\$25,000	Planning for Communities	Economic Development Strategy
CDBG Planning	Town of Superior	Mineral	\$39,500	Planning for Communities	PAR for Superior's swimming pool
CDBG Planning	Lake County	Lake	\$50,000	Planning for Communities	Affordable Housing Constructability Study
CDBG Planning	Town of Saco	Phillips	\$50,000	Planning for Communities	Levee Feasibility Study
CDBG Planning	Town of White	Meagher	\$23,377	Planning for Communities	Comprehensive Recreation Master Plan


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Program	Applicant	County	Funds Awarded	Goal	Project Description
	Sulphur Springs				
CDBG Planning	City of Dillon	Beaverhead	\$30,000	Planning for Communities	Growth Policy Update
CDBG Planning	City of Roundup	Musselshell	\$50,000	Planning for Communities	Preliminary Architectural Report
CDBG Planning	Custer County	Custer	\$50,000	Planning for Communities	Capital Improvements Plan
CDBG Planning	Dawson County	Dawson	\$24,120	Planning for Communities	Preliminary Architectural Report
CDBG Planning	City of Red Lodge	Carbon	\$50,000	Planning for Communities	Housing Study & Land Assessment
CDBG Planning	Musselshell County	Musselshell	\$50,000	Planning for Communities	Growth Policy & Capital


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Program	Applicant	County	Funds Awarded	Goal	Project Description
					Improvements Plan
CDBG Planning	City of East Helena	Lewis & Clark	\$15,000	Planning for Communities	Capital Improvements Plan
CDBG Planning	Town of Clyde Park	Park	\$15,000	Planning for Communities	Preliminary Engineering Report
CDBG Planning	Town of Bridger	Carbon	\$24,000	Planning for Communities	Growth Policy
CDBG Planning	Town of Cascade	Cascade	\$22,500	Planning for Communities	Growth Policy Update
CDBG Planning	City of Thompson Falls	Mineral	\$25,500	Planning for Communities	Growth Policy Update
CDBG Planning	Town of Fairview	Richland	\$40,000	Planning for Communities	Subdivision & Zoning Regulation Updates


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Program	Applicant	County	Funds Awarded	Goal	Project Description
CDBG Planning	Town of Jordan	Garfield	\$30,000	Planning for Communities	Growth Policy Update
CDBG Planning	Golden Valley County	Golden Valley	\$26,250	Planning for Communities	Growth Policy Update
CDBG Planning	Richland County	Richland	\$50,000	Planning for Communities	Growth Policy Update & Zoning Study
CDBG Planning	City of Sidney	Richland	\$40,000	Planning for Communities	Downtown Master Plan
CDBG Planning	Town of Geraldine	Chouteau	\$40,000	Planning for Communities	Preliminary Architectural Report
CDBG Economic Development	City of Helena	Lewis & Clark	\$525,000	Revitalizing Local Economies	Working Capital for The Union restaurant
HOME	District IX HRDC	Gallatin	\$220,000.00	Preserve and Construct Affordable Housing	Rehabilitation of 8 rental units


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Program	Applicant	County	Funds Awarded	Goal	Project Description
HOME	Skyview Residence LLLP	Yellowstone	\$350,000.00	Preserve and Construct Affordable Housing	New construction of 26 rental units
HOME	HomeFront	Yellowstone	\$982,000.00	Preserve and Construct Affordable Housing	Rehabilitation of 30 units with project-based rental assistance for seniors
HTF	The Housing Company	Beaverhead	\$416,100	Preserve and Construct Affordable Housing	New construction of 20 units for seniors
HTF	United Housing Partners	Gallatin	\$1,517,100	Preserve and Construct Affordable Housing	New construction of 162 rental units
HOME-ARP	Family Promise of Gallatin Valley	Gallatin	\$750,000	Reduce Homelessness	Acquisition and rehab of 31 units of transitional housing.


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Program	Applicant	County	Funds Awarded	Goal	Project Description
HOME-ARP	Crow Tribe	Big Horn	\$2,404,291	Reduce Homelessness	Rehab of an existing building to provide 27 units of permanent supportive housing.

Source: Commerce's Grants Database (<https://commerce.mt.gov/Funded-Projects>)

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).

Data presented in Table 2 are for the projects completed during Plan Year 5 and are not cumulative for the 2020-2024 Consolidated Plan.

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

	CDBG	CDBG-CV	HOME	HOPWA	ESG	HTF	Total
White	194,821	5,091	55	0	1,120	2	201,089
Black / African American	7	33	0	0	67	0	107
Asian	10	40	0	0	13	0	63
American Indian / Alaskan Native	10	91	3	0	262	6	372
Native Hawaiian or Other Pacific Islander	11	45	0	0	5	0	61
American Indian / Alaskan	23	0	1	0	47	1	72


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	CDBG	CDBG-CV	HOME	HOPWA	ESG	HTF	Total
Native and White							
Asian and White	0	0	0	0	2	0	2
Black / African American and White	0	2	0	0	12	0	14
American Indian / Alaskan Native and Black / African American	0	0	0	0	5	0	5
Other	58	29	3	0	12	0	102
Not Identified	0	0	0	0	44	0	44
Total	194,940	5,331	62	0	1,589	9	201,931
Hispanic	383	45	1	0	188	1	618
Not Hispanic	50	5,286	61	0	1,357	8	6,762
Not Identified	0	0	0	0	44	0	44

Source: IDIS Report PR23 – CDBG Summary of Accomplishments; IDIS Report PR23 – CDBG-CV Summary of Accomplishments; IDIS Report PR23 – HOME Summary of Accomplishments; 2024 Completed IDIS activities for HTF

Narrative

The CDBG, CDBG-CV, HOME, HTF, and ESG programs assisted persons from various racial and ethnic backgrounds during Plan Year 5. In total, 201,089 assisted individuals identified as White; 107 identified as Black or African American; 63 identified as Asian; 372 identified as American Indian or American Native; and 61 identified as Native Hawaiian or Other Pacific Islander. 6,762 of the assisted individuals identified their ethnic background as Not Hispanic, 618 identified as Hispanic, and 44 did not identify.

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.

CR-15 – Resources and Investments 91.520(a)

Identify the resources made available.

Table 3 reflects resources made available and expenditures by program during Plan Year 5.

Table 3 – Resources Made Available

Sources of Funds	Source	Resources Made Available*	Amount Expended During Program Year
CDBG	Public/Federal	\$6,172,506.00	\$8,330,411.25
CDBG-CV**	Public/Federal	\$0.00	\$3,277,062.89
HOME	Public/Federal	\$3,500,000.00	\$7,392,659.33


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Sources of Funds	Source	Resources Made Available*	Amount Expended During Program Year
HOME-ARP**	Public/Federal	\$0.00	\$1,739,532.95
HOPWA	N/A	N/A	N/A
ESG	Public/Federal	\$744,418	\$741,200
HTF	Public/Federal	\$3,144,833.37	\$6,488,206.95

Source: IDIS Report PR26 – CDBG Financial Summary Report; PR23 – CDBG-CV Summary of Accomplishments; IDIS Report PR07 – Drawdown Report by Voucher Number

* Amounts in this column reflect the estimates provided in the 2024-2025 AAP.

** One-time-only funds made available in previous program years.

Narrative

During the 2024-2025 program year, the CDBG program received an allocation of \$6,172,506. During the 2024-2025 program year, \$8,330,411.25 of this resource was expended. Utilizing resources made available, the CDBG program awarded a total of \$4,795,247 to 30 projects as detailed in Table CR-3. Additional awards will be made early in the 2025-2026 program year for the applications received in June 2025 as detailed in Table CR-2.

During the 2020-2021 program year, the CDBG-CV program received an allocation of \$10,174,175.00, all of which was awarded during the 2021-2022 program year. During the 2024-2025 program year, \$3,277,062.89 was expended as detailed in Table CR-3.

During the 2024-2025 program year, the HOME program received an allocation of \$3,000,000. During the 2024-2025 program year, \$7,392,659.33 of this resource was expended, \$776,869.55 of which was program income. Utilizing resources made

available, the HOME program awarded a total of \$1,552,000.00 to three projects as detailed in Table CR-3. HOME awards in the 2024-2025 program year were less than the allocation due to forward allocation of funds during the 2023-2024 program year. All available HOME funds have been awarded to eligible projects.

During the 2021-2022 program year, the HOME-ARP program received an allocation of \$11,308,920, \$7,159,501 of which was awarded during the 2023-2024 program year, and the remaining \$3,185,000 was awarded during the 2024-2025 program year and the remaining HOME-ARP funds are set aside for administration of the program. During the 2024-2025 program year, \$1,739,532.95 was expended as detailed in Table CR-3.

During the 2024-2025 program year, the HTF program received an allocation of \$3,144,833.37. During the 2024-2025 program year, \$6,488,206.93 of this resource was expended. Utilizing resources made available, the HTF program awarded a total of \$1,933,200 to two projects as detailed in Table CR-3. HTF awards in the 2024-2025 program year were less than the allocation due to forward allocation of funds during the 2023-2024 program year. All available HTF funds have been awarded to eligible projects.

During the 2024-2025 program year, the ESG program received an allocation of \$744,418. This allocation was passed through to 8 HRDCs in Montana via formula grants. This program year saw expenditures of \$741,200 utilizing all of the FY23 allocation. Therefore, the amount spent is slightly lower than the amount awarded for FY24.

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.

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Identify the geographic distribution and location of investments.

Because the State of Montana does not have geographic priorities for any of its federally funded CPD programs, data is not provided in Table 4.

Table 4 – Identify the Geographic Distribution and Location of Investments

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


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Table CR-4 – Project Geographic Distribution and Percentage of Allocation for CDBG, HOME, and HTF

Source: Commerce’s Grants Database (<https://commerce.mt.gov/About/Funded-Projects>)

County	2020-2021 Funded Amount	2020- 2021 % of Award s	2021-2022 Funded Amount	2021- 2022 % of Awards	2022-2023 Funded Amount	2022- 2023 % of Awards	2023-2024 Funded Amount	2023- 2024 % of Awards	2024-2025 Funded Amount	2024- 2025 % of Awards	2020-2024 Total Funded Amount	2020- 2024 Total % of Awards
Anaconda-Deer Lodge	\$0	0	\$530,000	2.65	\$35,000	0.25	\$20,000	0.07	\$0	0.00	\$585,000	0.73
Beaverhead	\$30,000	0.3	\$0	0	\$0	0	\$0	0	\$446,100	3.90	\$476,100	0.59
Big Horn	\$450,000		\$30,000	.15	\$0	0	\$20,000		\$2,429,291	21.24	\$2,429,291	3.02
Blaine	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0.00	\$0	0
Broadwater	\$0	0	\$0	0	\$400,000	2.82	\$0	0	\$0	0.00	\$400,000	0.50
Butte-Silver Bow	\$50,000	0.5	\$1,300,000	6.5	\$800,000	5.65	\$2,235,000	8.11	\$0	0.00	\$4,385,000	5.45
Carbon	\$0	0	\$481,240	2.41	\$0	0	\$0	0	\$74,000	0.65	\$555,240	0.69
Carter	\$0	0	\$0.00	0	\$0	0	\$30,000	0.08	\$0	0.00	\$30,000	0.04
Cascade	\$0	0	\$1,700,000	8.5	\$26,250	0.19	\$26,250	0.09	\$22,500	0.20	\$1,775,000	2.21
Chouteau	\$0	0	\$0	0	\$750,000	5.29	\$0	0	\$40,000	0.35	\$790,000	0.98
Custer	\$0	0	\$60,000	0.3	\$750,000	5.29	\$0	0	\$50,000	0.44	\$860,000	1.07
Daniels	\$0	0	\$0	0	\$50,000	0.35	\$30,000	0.08	\$0	0.00	\$80,000	0.10
Dawson	\$0	0	\$10,000	0.05	\$626,250	4.42	\$36,750	0.13	\$24,120	0.21	\$697,120	0.87
Fallon	\$0	0	\$60,000	0.3	\$0	0	\$0	0	\$0	0.00	\$60,000	0.07
Fergus	\$530,000	5.27	\$380,000	1.9	\$250,000	1.76	\$0	0	\$50,000	0.44	\$1,210,000	1.50
Flathead	\$0	0	\$30,000	0.15	\$850,000	6	\$3,750,000	13.61	\$0	0.00	\$4,630,000	5.75
Gallatin	\$1,000,000	9.94	\$460,000	2.3	\$718,000	5.07	\$3,046,973	11.06	\$2,487,100	21.75	\$7,712,073	9.58
Garfield	\$0	0	\$0.00	0	\$0	0	\$0	0	\$30,000	0.26	\$30,000	0.04
Glacier	\$0	0	\$30,000	0.15	\$0	0	\$0	0	\$0	0.00	\$30,000	0.04


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County	2020-2021 Funded Amount	2020- 2021 % of Award s	2021-2022 Funded Amount	2021- 2022 % of Awards	2022-2023 Funded Amount	2022- 2023 % of Awards	2023-2024 Funded Amount	2023- 2024 % of Awards	2024-2025 Funded Amount	2024- 2025 % of Awards	2020-2024 Total Funded Amount	2020- 2024 Total % of Awards
Golden Valley	\$0	0	\$0	0	\$600,000	4.23	\$0	0	\$26,250	0.23	\$626,250	0.78
Granite	\$36,000	0.36	\$30,000	0.15	\$40,000	0.28	\$0	0	\$0	0.00	\$106,000	0.13
Hill	\$1,160,500	11.54	\$1,187,813	5.94	\$297,050	2.1	\$0	0	\$0	0.00	\$2,645,363	3.29
Jefferson	\$37,500	0.37	\$0	0	\$15,000	0.11	\$620,000	2.25	\$0	0.00	\$672,500	0.84
Judith Basin	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0.00	\$0	0.00
Lake	\$340,000	3.38	\$22,500	0.11	\$0	0	\$0	0	\$50,000	0.44	\$412,500	0.51
Lewis & Clark	\$550,000	5.47	\$2,257,187	11.29	\$2,054,282	14.5	\$4,917,194	17.84	\$540,000	4.72	\$10,318,663	12.82
Liberty	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0.00	\$0	0.00
Lincoln	\$37,500	0.37	\$624,972	3.12	\$1,400,000	9.88	\$816,000	2.96	\$600,000	5.25	\$3,478,472	4.32
Madison	\$25,000	0.25	\$22,500	0.11	\$776,250	5.49	\$20,000	0.07	\$700,000	6.12	\$1,543,750	1.92
McCone	\$472,500	4.7	\$550,000	2.75	\$0	0	\$54,000	0.19	\$0	\$0	\$1,076,500	1.34
Meagher	\$0	0	\$0	0	\$630,000	4.45	\$0	0	\$23,377	0.20	\$653,377	0.81
Mineral	\$0	0	\$259,310	1.3	\$750,000	5.29	\$20,060	0.07	\$765,000	6.69	\$1,794,370	2.23
Missoula	\$480,000	4.77	\$1,106,276	5.53	\$900,000	6.35	\$1,520,000	5.52	\$0	0.00	\$4,006,276	4.98
Musselshell	\$450,000	4.47	\$0	0	\$0	0	\$22,500	0.08	\$100,000	0.87	\$572,500	0.71
Park	\$0	0	\$60,000	0.3	\$0	0	\$1,467,500	5.32	\$15,000	0.13	\$1,542,500	1.92
Petroleum	\$485,000	4.82	\$600,000	3	\$0	0	\$0	0	\$0	0.00	\$1,085,000	1.35
Phillips	\$0	0	\$30,000	0.15	\$787,500	5.56	\$750,000	2.72	\$50,000	0.44	\$1,617,500	2.01
Pondera	\$450,000	4.47	\$30,000	0.15	\$0	0	\$0	0	\$0	0.00	\$480,000	0.60
Powder River	\$0	0	\$0	0	\$46,000	0.32	\$0	0	\$0	0.00	\$46,000	0.06
Powell	\$0	0	\$30,000	0.15	\$0	0	\$0	0	\$0	0.00	\$30,000	0.04
Prairie	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0.00	\$0	0.00


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County	2020-2021 Funded Amount	2020- 2021 % of Award s	2021-2022 Funded Amount	2021- 2022 % of Awards	2022-2023 Funded Amount	2022- 2023 % of Awards	2023-2024 Funded Amount	2023- 2024 % of Awards	2024-2025 Funded Amount	2024- 2025 % of Awards	2020-2024 Total Funded Amount	2020- 2024 Total % of Awards
Ravalli	\$35,000	0.35	\$1,665,500	8.33	\$41,000.00	0.28	\$6,017,528	21.83	\$0	0.00	\$7,759,028	9.64
Richland	\$0	0	\$0	0	\$0	0	\$0	0	\$130,000	1.14	\$130,000	0.16
Roosevelt	\$450,000	4.47	\$580,000	2.9	\$0	0	\$0	0	\$700,000	6.12	\$1,730,000	2.15
Rosebud	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0.00	\$0	0.00
Sanders	\$450,000	4.47	\$0	0	\$0	0	\$0	0	\$0	0.00	\$450,000	0.56
Sheridan	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0.00	\$0	0.00
Stillwater	\$50,000	0.5	\$0	0	\$0	0	\$0	0	\$0	0.00	\$50,000	0.06
Sweet Grass	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0.00	\$0	0.00
Teton	\$22,500	0.22	\$0	0	\$526,500	3.72	\$0	0	\$0	0.00	\$549,000	0.68
Toole	\$450,000	4.47	\$350,000	1.75	\$0	0	\$0	0	\$700,000	6.12	\$1,500,000	1.86
Treasure	\$0	0	\$0	0	\$0	0	\$400,000	1.45	\$50,000	0.44	\$450,000	0.56
Valley	\$450,000	4.47	\$28,500	0.14	\$0	0	\$48,974	0.17	\$0	0.00	\$527,474	0.66
Wheatland	\$0	0	\$600,000	3	\$0	0	\$0	0	\$0	0.00	\$600,000	0.75
Wibaux	\$0	0	\$600,000	3	\$0	0	\$0	0	\$0	0.00	\$600,000	0.75
Yellowston e	\$1,565,000	15.56	\$2,069,704	10.35	\$50,000	0.35	\$1,687,500	6.12	\$1,332,000	11.65	\$6,704,204	8.33
Total	\$10,056,500	100.00	\$20,000,502	100.00	\$14,169,082	100.00	\$27,556,229	100.00	\$11,434,738	100.00	\$80,492,051	100.00

Narrative

As described in the 2020-2024 Consolidated Plan and the 2024-2025 AAP, the State of Montana does not target any particular geographic area for special assistance but allows non-entitlement communities to apply for CDBG, all communities and developers to apply for HOME, and developers to apply for HTF funding. ESG funds are distributed via formula allocation to HRDCs throughout the state.

While there is no planned geographic distribution in the 2020-2024 Consolidated Plan or 2024-2025 AAP, Table CR-4 shows the amount of CDBG, HOME, and HTF funds awarded and percent of total funding allocation by county for the 2024-2025 program year and the entire 2020-2024 Consolidated Plan period.

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. There was no state-owned land or property that was used to address the needs identified in this plan.

The CDBG program requires 50% match for Economic Development projects and 25% match for Public Facilities projects. For other CDBG projects, match is encouraged but not required. However, applicants' relative ability to leverage private, local, state, or federal funds is considered when ranking other CDBG projects. The maximum amount of CDBG funds that can be awarded to an individual project cannot exceed \$750,000 for

construction activities, \$525,000 for economic development activities, and \$50,000 for planning activities. These caps make leveraging an important component of any CDBG-funded project.

CDBG Economic Development match contributions can come from a variety of sources, including cash investment, bank loans, state or federal loan programs, or grants. Most Economic Development grants are at least partially matched with funds from state grants, private bank loans, or owner equity.

CDBG Public Facilities 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 include loan or grant funds from other competitive state grant programs, funds expended for predevelopment planning, the value of donated land or materials provided by the applicant, and 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.

Commerce's HOME program requires 5% match for both multi-family and single-family projects. This match requirement may be fully or partially waived if the subrecipient demonstrates financial hardship or shows that extenuating circumstances justify an exemption. HOME matching contributions must come from non-federal sources and are typically obtained through private grants; direct cash contributions; donated materials and labor; donated land or real property; foregone interest, taxes, fees; and proceeds from bond financing. The HTF, CDBG-CV and HOME-ARP programs do not require match.

ESG funds are matched by subrecipients who provide rental assistance and/or supportive services through their housing programs and the Montana Continuum of

Care 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. ESG match amounts are reported in the SAGE data system. An attachment of the report is included.

Commerce’s internal tracking processes are utilized to record and report all matching funds from CDBG and HOME projects. Grantees submit invoices and correlate funding sources to specific expenditures. Commerce staff document eligible matching funds with each drawdown and track the cumulative tally throughout the project. Table 5 indicates the excess matching funds the HOME program carried over from previous federal fiscal years, matching funds contributed during the current federal fiscal year, the total of all matching funds available for the current federal fiscal year, the amount of match liability for the current federal fiscal year, and the excess match that will be carried over to the next federal fiscal year. The match reported in this CAPER falls within the federal fiscal year beginning October 1, 2023, and ending September 30, 2024. In addition to this CAPER, Commerce provides match reporting via HUD form HUD-40107-A.

Table 5 – Fiscal Year Summary – HOME Match Report

Excess match from prior Federal fiscal year	\$19,669,454.77
Match contributed during current Federal fiscal year	\$2,316,458.82
Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$21,985,913.59
Match liability for current Federal fiscal year	\$591,044.55

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Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$21,394,869.04
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Source: IDIS Report PR33 – HOME Matching Liability; Commerce Comprehensive Tracking Spreadsheets

Table 6 reports each HOME matching fund contribution recorded between October 1, 2023, and September 30, 2024, per HUD requirements. These funds are contributed as part of the HOME program, which supports housing development and rehabilitation activities, and provides down payment assistance to homebuyers.


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Table 6 – Match Contribution for the Federal Fiscal Year

Activity ID	Date of Contribution	Cash (Non-Federal Sources)	Foregone Taxes, Fees, Charges	Land Real Prop	Required Infrastructure	Site Preparation Construction, Materials, Donated Labor	Bond Financing	Total Match
5208	11/07/2023		\$1,478,897.88					\$1,478,897.88
5507	01/19/2024						\$38,000.00	\$38,000.00
5508	01/02/2024	\$74,541.00					\$33,126.00	\$107,667
5511	02/14/2024						\$58,251.75	\$58,251.75
5512	01/17/2024	\$129,541.00					\$46,500.00	\$176,041.00
5513	02/08/2024	\$2,414.34						\$2,414.34
5516	03/13/2024	\$5,965.79					\$44,000.00	\$49,965.79
5517	03/15/2024	\$300,000.00						\$300,000.00
5518	06/24/2024	\$2,600.00				\$10,000.00		\$12,600.00
5519	04/18/2024	\$2,300.00					\$42,349.50	\$44,649.50
5521	05/08/2024		\$21,057.76					\$21,057.76
5520	05/28/2024	\$26,913.80						\$26,913.80
Total Non-Bond Financing Match:								\$2,054,231.57


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Activity ID	Date of Contribution	Cash (Non-Federal Sources)	Foregone Taxes, Fees, Charges	Land Real Prop	Required Infrastructure	Site Preparation Construction, Materials, Donated Labor	Bond Financing	Total Match
Total Bond Financing Match Eligible:								\$262,227.25
TOTAL ELIGIBLE MATCH:								\$2,316,458.82

Source: IDIS Report PR07 – Drawdown by Voucher Number – All Vouchers; PR33 – HOME Matching Liability Report; Commerce Comprehensive Tracking Spreadsheet

HOME began the program year with \$0.00 in program income, received \$776,869.55 and expended \$776,869.55 in program income during the program year. The HOME program does not award or expend funding for Tenant Based Rental Assistance activities, therefore there are zero dollars listed in Table 7 for TBRA activities.

Table 7 – Program Income

Program Income – Enter the program amounts for the reporting period				
Balance on hand at the beginning of the reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$0	\$776,869.55	\$776,869.55	\$0	\$0

Source: IDIS Report PR09 – Receipt Fund Type Detail Report

HOME MBE/WBE Report

Commerce collects and records Disadvantaged Business Enterprise, Minority Business Enterprise, and Women-Owned Business Enterprise information throughout the program year and reports it to HUD for the federal fiscal year in the Contract and Subcontract Activity Report. Table 8 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 MBE or WBE. For HOME in Plan Year 5, Commerce recorded no MBE prime contractors, two MBE subcontractors, no WBE contractors, and no WBE subcontractors.

Table 8 – Minority Business and Women Business Enterprises

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	TOTAL	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	7	0	0	0	0	7
Dollar Amount	\$14,257,665.00	\$0	\$0	\$0	\$0	\$14,257,665.00
Sub-Contracts						
Number	30	2	0	0	0	28
Dollar Amount	\$8,269,037.83	\$477,670.83	\$0	\$0	\$0	\$7,791,367.00

	TOTAL	Women Business Enterprises	Male
Contracts			
Number	7	0	7
Dollar Amount	\$14,257,665.00	\$0	\$14,257,665.00
Sub-Contracts			
Number	30	0	30
Dollar Amount	\$8,269,037.83	\$0	\$8,269,037.83

Source: Form HUD-2516 for periods 04/01/2024-09/30/2024 and 10/01/2024-03/31/2025.

Table 9 – Minority Owners of Rental Property

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						
	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	\$0	\$0	\$0	\$0	\$0

During Plan Year 5, as reflected in Table 10, no parcels were acquired, no businesses were displaced, and no nonprofit organizations were displaced. No households were displaced during the program year. Households were temporarily relocated within and from rental properties during rehabilitation; all were provided General Information Notices, assisted with moving belongings and none were permanently displaced.

Table 10 – Relocation and Real Property Acquisition

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired	N/A	\$0				
Businesses Displaced	N/A	\$0				
Nonprofit Organizations Displaced	N/A	\$0				
Households Temporarily Relocated, not Displaced	8	\$79,203				
Households Displaced	TOTAL	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Cost	\$0					

Source: Commerce staff completion reports.

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

	1-Year Goal	Actual
Number of homeless households to be provided affordable housing units	120	254
Number of non-homeless households to be provided affordable housing units	57	228
Number of special needs* households to be provided affordable housing units	10	9
Total	187	491

Source: IDIS Report PR22 – Status of HOME Activities – State; IDIS Report PR23 – CDBG Summary of Accomplishments; IDIS Report PR23 – HOME Summary of Accomplishments; IDIS Report PR104 – HTF High Priority Performance Goals; DPHHS

*Special needs, for the purpose of this report, is defined as disabled, elderly, veteran, and HIV/AIDS households, or households that have been impacted by domestic violence. With the exception of HTF, neither homeless nor special-needs households as defined are tracked and reported in IDIS.

Table 12 – Number of Households Supported

	1-Year Goal	Actual
Number of households supported through rental assistance	100	419



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	1-Year Goal	Actual
Number of households supported through the production of new units	32	18
Number of households supported through the rehab of existing units	45	40
Number of households supported through the acquisition of existing units	10	14
Total	187	491

Source: IDIS Report PR22 – Status of HOME Activities – State; IDIS Report PR23 – CDBG Summary of Accomplishments; IDIS Report PR23 – HOME Summary of Accomplishments; IDIS Report PR104 – HTF High Priority Performance Goals; DPHHS

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

The State of Montana made progress towards reaching the goals and objectives identified in the 2020-2024 Consolidated Plan and 2024-2025 AAP. During Plan Year 5, Commerce awarded CDBG, HOME, and HTF funds to activities that addressed Goals 1 and 5. DPHHS used ESG funds to provide rental assistance to address Goal 5. Tables 11 and 12 demonstrate that DPHHS provided rental assistance to more households for rental housing than planned. Commerce fell just short of its goals for the number of special needs households assisted by projects completed during Plan Year 5 and for new construction and rehabilitation of units. CDBG funds financed the completion of rehabilitation activities for one homeowner. HOME-funded activities provided critical affordable housing development with construction and rehabilitation of 48 HOME-assisted units in 6 rental properties and exceeded the goal to provide downpayment and closing cost assistance to 14 households. HTF-funded activities provided critical affordable housing development to 9 households through rehabilitation of one senior project. Developers have been participating in acquisition and rehabilitation projects,

more than new construction, due to shortages in labor and material markets. ESG-funded activities provided assistance to 1,589 individuals in 1,314 households through all of its activities, as detailed in CR-25. The numbers reported in Tables 11 and 12 include ESG rental assistance provided to 246 households experiencing homelessness and 173 households who were prevented from becoming homeless.

For this program year with ESG, subrecipients utilized FY23 funds to assist as many participants as possible. With the ending of ESG-CV and Montana's Emergency Rental Assistance funds provided for in the American Rescue Plan Act, there was a rise in need. In addition to the figures reported in Tables 11 and 12, CDBG-CV funds completed 4 rental homes, and 3 homes for homebuyers during Plan Year 5.

While during Plan Year 5, the one HTF project that was completed does not specifically serve households with disabilities or those experiencing homelessness, but it does serve seniors and households with extremely low-incomes. One of the HOME projects completed provides a group home setting for those experiencing homelessness. CDBG projects are underway that will serve those experiencing homelessness. Importantly, efforts to serve households in critical need are supplemented by CDBG-CV and HOME-ARP activities.

[Discuss how these outcomes will impact future annual action plans.](#)

Commerce and DPHHS will continue to improve grant processes to successfully report the accomplishments of the CDBG, CDBG-CV, HOME, HOME-ARP, ESG, and HTF programs and measure progress made towards reaching long- and short-term goals and objectives. The 1-Year Goals for our regular HUD CPD programs (CDBG, HOME, HTF) were developed under our 2020-2024 Consolidated Plan and related Annual Action Plans for each program year. These “stretch goals” were solidified prior to the impacts of COVID and the passage of significant federal legislation, such as the CARES Act and American Rescue Plan Act. As previously mentioned, the State of Montana

aimed to prioritize use of these one-time-only federal resources, and in some instances that effort did have unintended impacts on our regular HUD CPD program utilization and performance. In addition, market conditions such as inflation, increased construction costs, market interest rates, labor/contractor shortages and supply chain issues continued to have an impact on production and performance goals. The state continues to see the trend of developers reducing the number of CDBG-, HOME- and HTF-assisted units in proposed developments in response to these factors.

As a means of improving our actual performance outcomes going forward, Commerce is actively applying lessons learned and feedback from our awardees as we consider revisions to our grant administration manuals and processes, and as we develop our next AAP and Montana’s 2025-2029 Consolidated Plan.

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 13 – Number of Households Served

Number of Households Served	CDBG Actual (Housing)	HOME Actual	HTF Actual
Extremely Low-income	1	14	9
Low-income		48	N/A
Moderate-income		N/A	N/A
Total	1	62	9

Source: IDIS Report PR23 – CDBG Summary of Accomplishments; IDIS Report PR23 – HOME Summary of Accomplishments; IDIS Report PR103 – HTF Program and Beneficiary Characteristics for Completed Units; PR104 – HTF High Priority Performance Goals

Narrative Information

CPD resources are used to address the needs of 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 needs of their community's most vulnerable families and individuals; however, Commerce does not mandate the types or locations of projects that are submitted. Commerce accepts applications from all eligible entities working to meet the highest and most critical housing needs in local communities. Projects awarded are detailed in Table CR-3. All awards will address the highest and most critical housing needs of families and individuals in Montana.

Table 13 reports the number of households served by CDBG, HOME, and HTF housing activities. CDBG-Housing assisted one extremely low-income homeowner with rehabilitation that was completed during Plan Year 5. HOME assisted 14 extremely low-income households who were renters; 4 very low-income homebuyers; 25 very low-income renter households; and 9 renter households and 10 homebuyers with low incomes. Of the 14 homebuyers assisted, four households had incomes below 50% AMI, three with incomes between 51% and 60%, and the remaining seven had incomes between 61% and 80%. HTF assisted nine extremely low-income senior households in the one rental rehabilitation project that was completed during Plan Year 5. Of those nine, none were households living with disabilities and none were experiencing chronic homelessness.

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

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

While MTCoC strives to meld and leverage programs and resources at the federal and 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 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 program which now operates statewide, local veteran groups, faith-based programs, and the federally funded Project for Assistance in Transition from Homelessness programs (but only in Billings, Butte, and Missoula). Limited ESG funds are being used for street outreach activities in one community. Coordinated Entry Systems across the state provide for uniform intake and assessment using assessment 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 for homeless persons.

Emergency Shelter: ESG funds were used to assist 1 emergency shelter. A total of 771 individuals in 749 households were assisted. Emergency shelters continue to need

support. As funding levels return to pre-COVID levels, ESG will not be able to support them at the same level it has in the past.

HOME-ARP resources are being used to develop non-congregate shelters, in addition to permanent supportive housing. Furthermore, Emergency Shelter Facilities Grant resources provided by the State of Montana are being used in seven Montana counties to develop or rehabilitate congregate and non-congregate emergency shelter facilities.

Transitional Housing: ESG is not used to support transitional housing. The Point-In-Time counted individuals sheltered in transitional housing.

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. In Plan Year 5, 324 individuals were served with these funds.

All the ESG-funded housing programs are required to provide case management and assist clients in accessing cash benefits from mainstream programs, including: 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 is a federally funded Health Resources and Services Administration 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 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 HRDCs 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.
- Montana Housing Stability Services Program is a partnership with the Montana Department of Public Health & Human Services and the Montana Emergency Rental Assistance Program in the Department of Commerce. The HSS Program assists individuals with developing a housing plan to find and/or keep housing. This includes making connections to other supportive services that an individual might need to live successfully in the community.

Discharged Persons from Public Institutions: Both the ESG and continuum of care Rapid Rehousing programs serve discharged persons. The MTCOC does not specifically target funding toward discharged persons, but the ESG and continuum of care 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.

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.

ESG subrecipients participate in MTCoC activities. The MTCoC, 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, including the 2025 state legislation that adjourned on April 30, have not been successful. Congressional funding to HUD/CoC continues to be the sole resource.

Chronically Homeless: The focus on serving Chronic Homeless continues through the vulnerability assessment process provided in Coordinated Entry.

Rapid Rehousing: 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; 347 individuals were served with these funds.

Permanent Supportive Housing: Permanent supportive housing provides long-term housing with supportive services for persons with disabilities experiencing homelessness allowing them to live independently in a permanent setting. ESG funds are not used for a permanent supportive housing program. However, HOME funds were awarded to a historic rehab property that will provide 25 PSH units and is scheduled to lease up summer of 2025. HOME-ARP funds are expected to provide PSH for projects serving qualifying populations in the coming years.

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.

While HTF, HOME, and CDBG funds are not used for public housing investment, these resources are available to public housing authorities for the development of other, non-public affordable housing.

The Billings Housing Authority's private development corporation received a HOME award to rehabilitate a critical source of housing with rental assistance. The Public

Housing Authority of Butte is involved in two CDBG and CDBG-CV projects, one of which will rehabilitate an affordable housing property and the other will construct PSH. All needs, including public housing needs, are assessed by gathering and evaluating data and soliciting citizen and community input. While some identified needs may fall outside the scope of the HTF, HOME, and CDBG programs, Commerce can and does work collaboratively with others to ensure that comprehensive and statewide strategies for addressing all priority needs are in place.

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

All applications for homebuyer assistance under the HOME program identify whether prospective homebuyers come from public housing. Divisions within Commerce work collaboratively to encourage low- and moderate-income residents, including public housing residents, to attend homebuyer education courses offered throughout the state by various qualified providers. These courses are advertised statewide at various public housing authorities, with key partner agencies, and through a multi-media marketing approach.

Consolidated Plan documents are made available at various repositories where public housing residents are likely to seek services. All Montana citizens, including public housing residents, are encouraged to actively engage in the development and assessment processes of Montana's Consolidated Plan.

Actions taken to provide assistance to troubled PHAs

Commerce is aware of one local public housing authority in the state that is experiencing significant challenges, including recent litigation impacting the agency's financial stability. However, that housing authority has not applied for any specific assistance from Commerce as it continues to evaluate its options. Therefore, no actions have yet been taken to assist the troubled public housing authority.

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 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, regulations, housing assessments, and development throughout the state.

Through CDBG funding, local communities can prepare or update various planning documents, including comprehensive land use planning documents, which identify barriers to affordable housing (such as zoning, subdivision, and annexation regulations) and assist communities with addressing local needs.

In July 2022, Governor Gianforte issued Executive Order No. 5-2022 creating the Housing Advisory Council, also known as the Governor’s Housing Task Force. The purpose of the Task Force was to “provide the Governor with short- and long-term recommendations and strategies for the State of Montana to increase the supply of affordable, attainable workforce housing.” This 30-member, bipartisan Task Force was directed to provide two written reports. First, a written report by October 15, 2022 “with recommendations and strategies to increase the supply of affordable, attainable workforce housing, specifically focusing on measures the Legislature could consider and the Governor could sign into law.” Second, a written report by December 15, 2022 “with recommendations and strategies to increase the supply of affordable, attainable workforce housing, specifically focusing on regulatory changes and best practices that could be adopted by state agencies and local governments.”

As a result of the Task Force recommendations and a broad, bipartisan coalition, the State of Montana 68th Legislature passed a suite of significant land use and zoning ordinance bills, which were signed into law. These bills include but are not limited to:

- Montana Land Use Planning Act, which requires local governments to plan for future housing needs and adopt pro-housing zoning reforms.
- Revise zoning laws related to Accessory Dwelling Units (ADUs), to give landowners more freedom to respond to housing needs.
- Allow for duplex, triplex, and fourplex housing in city zoning, to end exclusionary zoning and increase access to starter homes and “missing middle” housing.
- Revise municipal zoning to allow multifamily and mixed-use development, to build denser homes in urban areas and protect our open spaces from sprawl.
 - As communities enact and comply with the new land use planning bills, there has been an increase in requests for planning dollars and technical assistance to identify new strategies to reduce the barriers to affordable homes in Montana. Assessing the comprehensive housing need is the first step, followed by identifying appropriate sites and then adapting the regulations to clearly remove the regulatory barriers.

The Governor’s Housing Task Force reconvened in October 2023 evaluating successes from the 68th Legislative session, including local government implementation of land use reforms to comply with new state laws, as well as identifying remaining challenges. The Task Force produced another report in June 2024 which included a comparison of Montana housing development successes and challenges using common themes, key factors, and root-cause analysis. Some areas of focus included parking reforms, minimum lot sizes, litigation against the state and/or municipalities over allowing housing, allowing for one staircase in multifamily residential construction, legalizing micro-units/co-housing, and additional financing tools to support infrastructure for new housing growth. The 2025 Legislature passed many of these recommendations in

various bills, which are in the enrollment and transmittal process to the governor for signature.

On January 14, 2025, HUD announced \$100 million in awards to communities to boost housing supply and lower housing costs with the Pathways to Removing Obstacles to Housing program. The State of Montana was awarded \$7 million to assist with land use updates, public engagement, and data analysis. This funding will incentivize affordable housing development and support homeownership for families of modest means.

Commerce will work with the Montana League of Cities and Towns to provide \$5 million of the PRO Housing grant to the 11 Montana LUPA communities to complete the planning and public participation work needed to meet the May 17, 2026, deadline for compliance with the Act. The remaining \$2 million will be used to create programs that communities statewide can access to further incentivize affordable housing development.

[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 Commerce 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 underserved and special needs populations.

Coordinated Entry Systems across the state provide for uniform intake and assessment of ESG and partnering programs using the local assessment 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\(j\)](#)

The state diligently undertakes rehabilitation and construction activities to ensure that households, particularly those with children, benefitting from federal housing programs are safe from LBP hazards and comply with current requirements of Title X of the Residential Lead Based Paint Hazard Reduction Act of 1992, HUD's Lead Safe Housing Rule and other applicable federal laws and regulations. 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 painting activities that disturb LBP in homes and childcare facilities built before 1978 is certified and follows specific work practices to prevent lead contamination. In addition to complying with Title X, LSHR, UPCS or NSPIRE inspections are performed on all homes (renter or owner-occupied) assisted with HTF, HOME, Section 8, and other public funds.

UPCS inspections are also conducted on all homes purchased with HOME assistance prior to the commitment of HOME funds. State staff conducting UPCS or NSPIRE inspections, as applicable, complete UPCS training as well as HUD's online Lead-Based Paint Visual Assessment Training.

Units that ESG-eligible households live in or move into 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\(j\)](#)

The state, in coordination with nonprofit organizations and the private sector, work to ensure individuals and families have pathways out of poverty by supporting local and

regional efforts to increase household incomes and provide affordable housing options. All of the strategies and priorities identified in the Consolidated Plan and AAP target the improvement of economic conditions for Montanans of low- to moderate-income, from the rehabilitation and new construction of affordable units, homebuyer assistance, and temporary shelter services to investment in compact, walkable development where efficiencies of public infrastructure, community services, and employment centers encourage healthy, vital, and resilient communities.

All HOME and HTF housing activities and all CDBG housing, public and community facilities, and economic development activities target extremely low-, low-, and moderate-income households and either directly or indirectly benefit 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. CDBG, HOME, HTF, and ESG resources are not adequate to meet the needs of Montanans with less than low- to moderate-incomes, particularly the homeless, disabled, elderly, and other disadvantaged populations. However, the ability to effectively relay information regarding existing grant opportunities and technical assistance from the state to eligible entities continues to be one of Montana's greatest challenges. There are areas of opportunity for increased collaboration vertically and horizontally, as well as 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.

During Plan Year 5, both vertical and horizontal collaboration was emphasized with Commerce's Community MT Division and Housing MT Division working closely together, along with DPHHS and the MTCOC, to address housing and healthcare needs in Montana. One example being the ProHousing application.

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

Commerce pursues opportunities to coordinate with public and private housing and social service agencies and partners. Coordination occurs during the execution and completion of planning and development projects.

DPHHS is represented on various state advisory groups to ensure coordination of social services for needy populations in Montana. DPHHS works proactively with its MTCoC partners to ensure that efficient and effective coordination of services exists between affordable housing and social services.

Commerce and DPHHS continue to work with a vast array of public entities and key stakeholders, through numerous public meetings to affirmatively further fair housing. Commerce and DPHHS also participate in the Interdepartmental Housing Integration Project to address housing and healthcare needs.

Commerce undertook extensive outreach, as detailed in its [HOME-ARP Allocation Plan](#) pages 1 through 7, to agencies that serve Qualifying Populations, as defined by the HOME-ARP program. These conversations informed Commerce's HOME-ARP Allocation Plan, which was approved in April 2023, and amended in January 2025.

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

During Program Year 5, Commerce hired a consultant to lead efforts to develop Montana's Fair Housing Plan. An extensive process to collect and analyze data and public input took place throughout 2024. The Fair Housing Plan provides important data to stakeholders working to remove and ameliorate the negative effects of public policies currently serving as barriers to affordable housing and fair housing choice. Commerce

submitted Montana's Fair Housing Plan to HUD in September 2024 and used its findings to inform Montana's 2025-2029 Consolidated 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 and owners to ensure compliance with program requirements. The HOME, CDBG, and HTF programs continually evaluate and improve processes to ensure compliance with federal regulations. Program staff hold regular calls with grantees and owners to deliver technical assistance in every phase of a project.

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. Program staff work with grantees and relevant partners to schedule monitoring visits, providing ample notice and sufficient details to ensure a productive and thorough monitoring. If issues are observed or technical assistance is needed, a project may be monitored more than once before closeout. After a project has been monitored, Commerce issues a monitoring letter documenting performance issues, concerns, or findings and relevant corrective actions, as applicable.

HOME and HTF project activities are monitored at various stages during a project's life. Commerce staff conduct construction monitoring to verify work is underway and to provide technical assistance, as needed. Final monitoring includes a visit to the construction site at project completion to conduct a detailed file audit of all relevant records and documents related to the project, as well as HUD-compliant inspections to

ensure the project is prepared for closeout. HOME and HTF projects are then monitored during the first 3 years of their periods of affordability, with the first monitoring occurring within 1 year of project closeout per HUD regulations. These initial monitoring visits provide the grantee with an opportunity to receive HOME and HTF program training and technical assistance. After the first 3 years of the period of affordability, project monitoring occurs every 1 to 3 years depending on assessed risk. During all period of affordability monitoring, a property inspection as well as a file review to verify tenant income eligibility, rent limit compliance, and proper documentation is completed for a sample of assisted units. Additionally, on an annual basis, HOME and HTF grantees submit rent and occupancy information to Commerce reporting on beneficiaries, rent structure, changes to leases or tenant selection policies and property financials. Monitoring visits also help verify the information submitted in rent and occupancy reports.

During Plan Year 5, ten CDBG projects, three HOME projects, and two HTF projects were monitored during project completion visits. In addition, four HOME projects and five HTF projects were monitored during construction progress visits. CDBG projects monitored included those in the City of Helena, Lewis and Clark County, Golden Valley County, City of Havre, Town of Cascade, Meagher County, City of Libby, Carbon County, and the Town of Richey.

During Plan Year 5, Commerce staff conducted period of affordability monitoring on-site visits to 31 HOME and 13 HTF properties. See **Appendix B** for a complete list of the projects and CR-50 for more information. One of the properties monitored reported requests by residents for emergency transfers. A handful of properties monitored reported requests for reasonable accommodations, as detailed in **Appendix B**.

All 8 ESG subrecipients were monitored with a combination of on-site visits, and desk monitoring.

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.

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 its website, print advertisements in newspapers across the state, and a listserv of approximately 5,000 individuals, towns, counties, nonprofits, and interested parties. The draft documents are available electronically on Commerce's website and in hard copy at 22 repositories spread across Montana. The draft documents are also available upon request.

Citizens are invited to comment on draft documents via oral testimony during in-person or virtual public hearings or via written statements provided through email or regular mail. Citizens are provided reasonable accommodations and alternative formats of draft documents and hearing materials upon request.

The public comment period for the Draft 2024-2025 CAPER began on May 19, 2025 and ended June 6, 2025. A virtual public hearing was held May 22, 2025. An official transcript of the public hearing, a record of all comments considered, and responses provided are included in **Appendix A**.

CR-45 – CDBG 91.52(d)

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 Plan Year 5.

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(e)

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

As described in CR-40, HOME projects under construction are monitored two or more times during the award 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. Projects are then monitored during the first 3 years of the period of affordability and then every 1 to 3 years thereafter depending on assessed risk.

See **Appendix B** for a table of HOME projects monitored between April 1, 2024, and March 31, 2025. The appendix also provides information regarding requests for emergency transfers and reasonable accommodation. Note there was one monitored property with emergency transfers requested.

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

Commerce reviews all Affirmative Fair Housing Marketing Plans 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 that all updated documentation be 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 period of affordability.

[Provide data on the amount and use of program income for projects, including the number of projects and owner and tenant characteristics.](#)

As reflected in IDIS Report PR09, HOME began the program year with \$0.00 in program income, received \$776,869.55 in program income during the program year and expended \$776,869.55. Of those funds, \$756,229.16 of HOME program income was used by two subrecipients to provide 12 homebuyers with down payment and closing cost assistance; four had incomes under 50% AMI, three with incomes between 51% and 60%, and five with incomes between 61% and 80%. An additional \$20,640.39 was used as part of larger investments of HOME funds in two different multifamily projects that are projected to be completed during the 2025-2026 program year and will assist primarily very low-income households.

[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\(j\)](#)

Within Commerce, managers who oversee the Low-Income Housing Tax Credit and HUD CPD programs work together to foster and maintain affordable housing in Montana. LIHTC is often a leveraged funding source for HOME, HTF, and CDBG housing projects. The LIHTC, HOME, HTF, and CDBG-Housing applications share underwriting criteria so that program requirements complement and do not contradict each other. Commerce staff coordinated the distribution of State and Local Fiscal Recovery Funds from the ARPA with HOME and HTF awards to ensure that previously funded projects were able to fill financing gaps that resulted from labor and material

shortages due to the Coronavirus pandemic. Coordination within Commerce has aligned application deadlines and improved communication with grantees to provide for more comprehensive technical assistance at every phase of project work.

CR-55 – HOPWA 91.520(f)

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

Number of Households Served Through:	1-Year Goal	Actual
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		
Total		

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 2024-2025 AAP, Commerce set out to use its \$3,144,833.37 annual allocation to support the development and rehabilitation of rental housing. All activities meet the requirements of 24 CFR part 93.

One HTF activity was completed in Plan Year 5; this activity rehabilitated nine HTF-assisted units in a property with 32 total housing units. All HTF-assisted units were occupied and the household incomes of the residents in those units were below 30% AMI, as shown in Table 15. The property receives project-based rental assistance through USDA-Rural Development ensuring renters pay no more than 30% of their income toward rent.

Onsite monitoring results for HTF projects under construction and in their periods of affordability are detailed in **Appendix B**. One monitored property had requests for emergency transfers.

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

Tenure Type	0 – 30%	0% to 30+ to poverty line	% of the higher of 30+ AMI or poverty line to 50% AMI	Total Occupied Units	Units Completed, Not Occupied	Total Completed Units
Rental	9	0	0	9	0	9
Homebuyer*	0	0	0	0	0	0

Source: IDIS Report PR104 – HTF High Priority Performance Goals

* The approved AAP does not include homebuyer activities as eligible for HTF.

CR-58 – Section 3

Table 16 – CR 58 Section 3 Total Labor Hours

	CDBG	HOME*	ESG**	HOPWA**	HTF
Total Number of Activities	6	3			1
Total Labor Hours	25,385	32,325			15,609
Total Section 3 Worker Hours	1	860			1,478
Total Targeted Section 3 Worker Hours	1	0			0

Source: IDIS Report Section 3

* Some of the HOME projects completed during Plan Year 5 were created in IDIS before HUD’s compliance start date of July 1, 2021. As a result, numbers for three of the six HOME projects completed in Plan year 5 are reported here.

** Section 3 does not apply to ESG or HOPWA.

Table 17 – CR 58 Section 3 Qualitative Efforts – Number of Activities by Program

	CDBG	HOME*	ESG**	HOPWA**	HTF*
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	0			1
Outreach efforts to generate job applicants who are Other Funding Targeted Workers	0	0			1


COMMERCE

	CDBG	HOME*	ESG**	HOPWA**	HTF*
Direct, on-the-job training (including apprenticeships)	1	1			0
Indirect training such as arranging for, contracting for, or paying tuition for off-site training	0	0			0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching)	0	1			0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns	0	1			0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services	0	1			0
Held one or more job fairs	0	2			0
Provided or connected residents with supportive services that can provide direct services or referrals	0	0			0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation	0	1			0
Assisted residents with finding childcare	0	0			0


COMMERCE

	CDBG	HOME*	ESG**	HOPWA**	HTF*
Assisted residents to apply for, or attend, community college or a four-year educational institution	0	1			0
Assisted residents to apply for, or attend, vocational/technical training	0	1			0
Assisted residents to obtain financial literacy training and/or coaching	0	1			0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns	0	0			0
Provided or connected residents with training on computer use or online technologies	0	0			0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses	1	1			0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act	0	0			0
Other	1	1			0

Source: IDIS Report Section 3

Narrative

The Section 3 Final Rule became effective on November 30, 2020, and the State of Montana switched its Section 3 reporting to IDIS for activities created in IDIS after HUD’s compliance start date of July 1, 2021. When projects are completed, staff enters applicable Section 3 data in IDIS for each completed activity. CDBG, HOME, and HTF projects where Section 3 is triggered – in other words, where more than \$200,000 in HUD assistance is used for housing or public facility rehabilitation or construction – often take multiple years to complete. Therefore, Table 16 and Table 17 contain Section 3 data for CDBG, HOME, and HTF projects that were set up after July 1, 2021, and were completed in Plan Year 5. These CDBG, HOME, and HTF projects are funded from CPD allocations from various program years.

CR-60 – ESG 91.520(g)

ESG Supplement to the CAPER in SAGE for Paperwork Reduction Act

1. Recipient Information – All Recipients Complete

Basic Grant Information	
Recipient Name	MONTANA
Organizational DUNS Number	809790579
UEI (SAM)	TR3DAXR9MCN8 – this is what is listed on the grant award
EIN/TIN Number	810302402
Identify the Field Office	DENVER
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Montana CoC

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 2	
City	Helena
State	MT
Zip Code	59620
Phone Number	406-447-4265
Extension	
Fax Number	
Email Address	slowen@mt.gov

ESG Secondary Contact	
Prefix	Mrs.
First Name	Julianna
Last Name	Campbell
Suffix	

Title	Community Services Section Supervisor
Phone Number	406-329-1612
Extension	
Email Address	julianna.campbell@mt.gov

2. Reporting Period – All Recipients Complete

Program Year Start Date	04/01/2024
Program Year End Date	03/31/2025

3. 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	\$113,558

Subrecipient or Contractor Name	HRDC of District IX, Inc.
City	Bozeman
State	MT
Zip Code	59715-6241


COMMERCE

DUNS Number	
Is subrecipient a victim services provider	N
Subrecipient Organization Type	Other Non-Profit Organization
ESG Subgrant or Contract Award Amount	\$97,332.67

Subrecipient or Contractor Name	Human Resource 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	\$114,502.35

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


COMMERCE

ESG Subgrant or Contract Award Amount	\$54,316.70
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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	\$52,486.16

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	\$137,750.73

Subrecipient or Contractor Name	District 6 – HRDC VI
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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	\$16,297.06

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	\$115,150.97

CR-65 – Persons Assisted

4. Persons Served

Not applicable to ESG. Data uploaded to Sage.

4a. Complete for Homelessness for Homeless 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	
Total	

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	
Total	

4c. Complete for Shelter

Table 18 – Shelter Information

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

Total	
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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	
Total	

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	
Total	

5. Gender – Complete for All Activities

Table 21 – Gender Information

	Total
Male	
Female	

Transgender	
Don't Know / Refused / Other	
Missing Information	
Total	

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	
Total	

7. Special Populations Served – Complete for All Activities

Table 23 – Special Population Served

Subpopulation	Total	Total Persons Served – Preservation	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans				
Victims of Domestic Violence				
Elderly				
HIV/AIDS				

Chronically Homeless				
Persons with Disabilities:				
Severely Mentally Ill				
Chronic Substance Abuse				
Other Disability				
Total (unduplicated if possible)				

CR-70 – ESG 91.520(g) – Assistance Provided and Outcomes

No longer applicable to ESG. All data is uploaded to Sage. As of October 1, 2021, this form is no longer applicable to ESG. Data is uploaded to Sage.

CR-75 – Expenditures

Expenditures – As of October 1, 2021, this form is no longer applicable to ESG. Data is uploaded to Sage.