

Montana's 2024 Fair Housing Equity Plan

September 30, 2024

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Montana's 2024 Fair Housing Equity Plan

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portalapps.hud.gov/FHEO903/Form903/Form903Start.action

or

Montana Fair Housing
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TABLE OF CONTENTS

Introduction	**1**
Fair Housing	**2**
Fair Housing Analysis	**4**
I. Demographics	**6**
II. Segregation and Integration	**10**
III. R/ECAPS	**222**
IV. Access to Community Assets	**25**
V. Access to Affordable Housing Opportunities	**577**
VI. Access to Affordable Homeownership and Economic Opportunity	**64**
VII. Local and State Policies and Practices Impacting Fair Housing	**70**
VIII. Summary of Fair Housing Analysis	**75**
Fair Housing Issues	**77**
Fair Housing Goals	**84**

Appendix A: Public Comments and Agency Responses

Appendix B: Public Hearing Transcripts and Outreach Documents

Appendix C: Fair Housing Survey

COMMERCE

Introduction

This Fair Housing Equity Plan seeks to inform *Montana's 2025-2029 Consolidated Plan for Housing and Community Development* and serves the purpose of assessing Montana's fair housing issues and their underlying causes, as well as setting fair housing goals. The sections included in this plan detail the State's analysis and its proposed strategies for achieving equity in housing, which includes overcoming patterns of segregation and discrimination.

After a comprehensive public review process, this plan was submitted to the U.S. Department of Housing and Urban Development for final review and approval as a requirement of receiving HUD formula grant funding for housing and community development activities.

Once adopted, this plan and the data presented herein can be used to inform local and state decision-making processes, practices and policies. It can also be used as an educational tool, providing a snapshot of socio-economic conditions, increasing individual and institutional awareness of fair housing rights, and outlining strategic goals that can be pursued by fair housing stakeholders broadly.

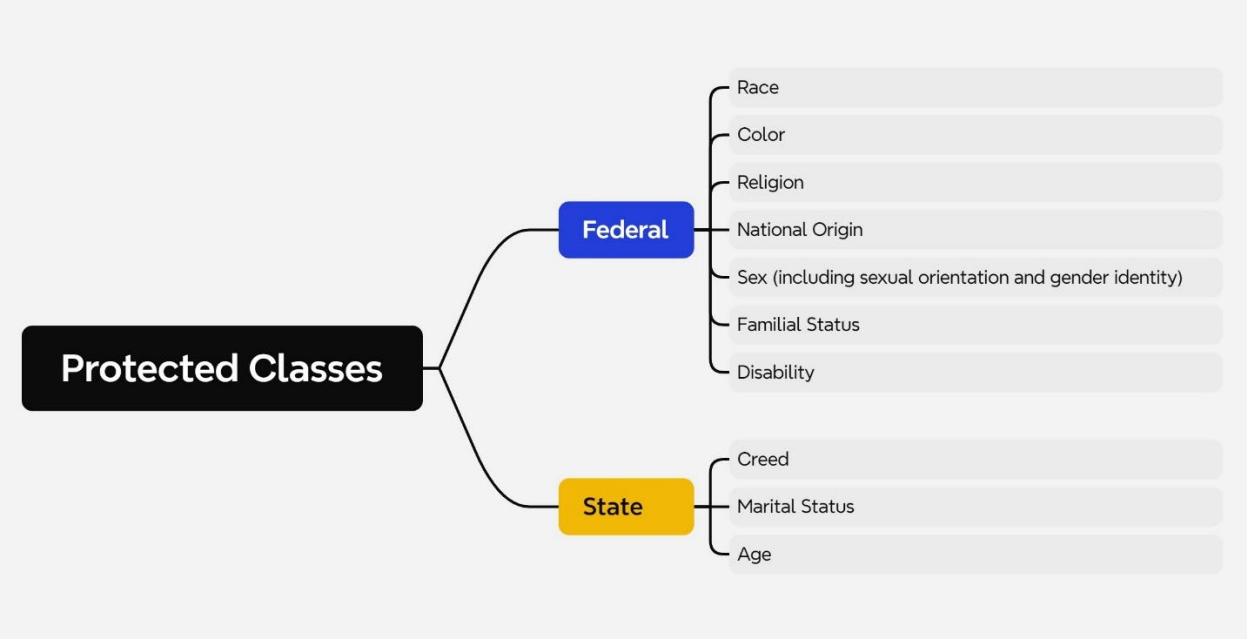
Fair Housing

The Civil Rights Act of 1968, signed by President Lyndon Johnson on April 11, 1968, expanded on previous acts and prohibited discrimination in housing sales, leasing and financing based on race, color, religion, national origin, sex and (as amended) handicap and familial status. With passage of the Act and after years of consideration, Title VIII, also known as the Fair Housing Act, was enacted. Discrimination based on sex was prohibited under the Act in 1974. When the law was comprehensively amended in 1988, it also prohibited discrimination based on disability and the presence of children under the age of 18 in a household.

The Act authorizes federal lawsuits by the U.S. Department of Justice and private lawsuits that can be filed in federal or state courts by individuals. Where violations of the law are established, remedies under the Fair Housing Act may include the award of compensatory damages to those who have experienced discrimination.

In addition to the federally protected classes noted above, the Montana Human Rights Act protects against discrimination based on creed, marital status, and age.

Both the federal and state fair housing acts prohibit retaliation against anyone who pursues their rights under the acts or assists others in doing so. Additionally, local jurisdictions may have nondiscrimination ordinances that provide further protections.



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Public Input Process

The Montana Departments of Commerce and Public Health & Human Services undertook a thorough public consultation process to gather information and feedback for this Fair Housing Equity Plan. This process included a series of meetings, outreach to community groups, targeting to underserved communities, a Fair Housing Survey, and a public input period.

Public Meetings

Three public hearings were held during the public review process. Two occurred prior to the release of the draft plan: the first was held on April 3, 2024, and the second was held on June 20, 2024. A final meeting will occur after the release of the draft plan on Sept. 10, 2024. Additionally, seven focus groups dealing specifically with housing and homelessness were held from May to July, and four regional meetings to discuss general housing and community needs were held from June to August. A detailed accounting of public outreach efforts, including lists of meeting attendees and all comments received, are included as Appendices A and B of this document. Informal feedback provided at focus group meetings and official comments received during public hearings are incorporated into this plan.

Fair Housing Survey

The Fair Housing Survey was utilized to gather feedback about the various needs for housing, the viewpoints of fair housing, and the need for fair housing education in the state. The survey was deployed on May 1, 2024, ended on May 31, 2024, and had 181 respondents in total. It was made available online and in print form. Commerce utilized scheduled internal and external-facing meetings, conference gatherings, newspaper publications, social media, and its listserv to publicize the survey with its network of service providers, agency contacts, and the general public. Survey responses are integrated into this plan and are included in Appendix C.

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Fair Housing Analysis

The Fair Housing Analysis takes a detailed look at access to housing and community assets in Montana. This includes an exploration of such concepts as segregation, racially or ethnically concentrated areas of poverty, access to community assets, access to affordable housing opportunities, access to affordable homeownership and economic opportunities, and local and state policies impacting fair housing.

Data Collection and Analysis

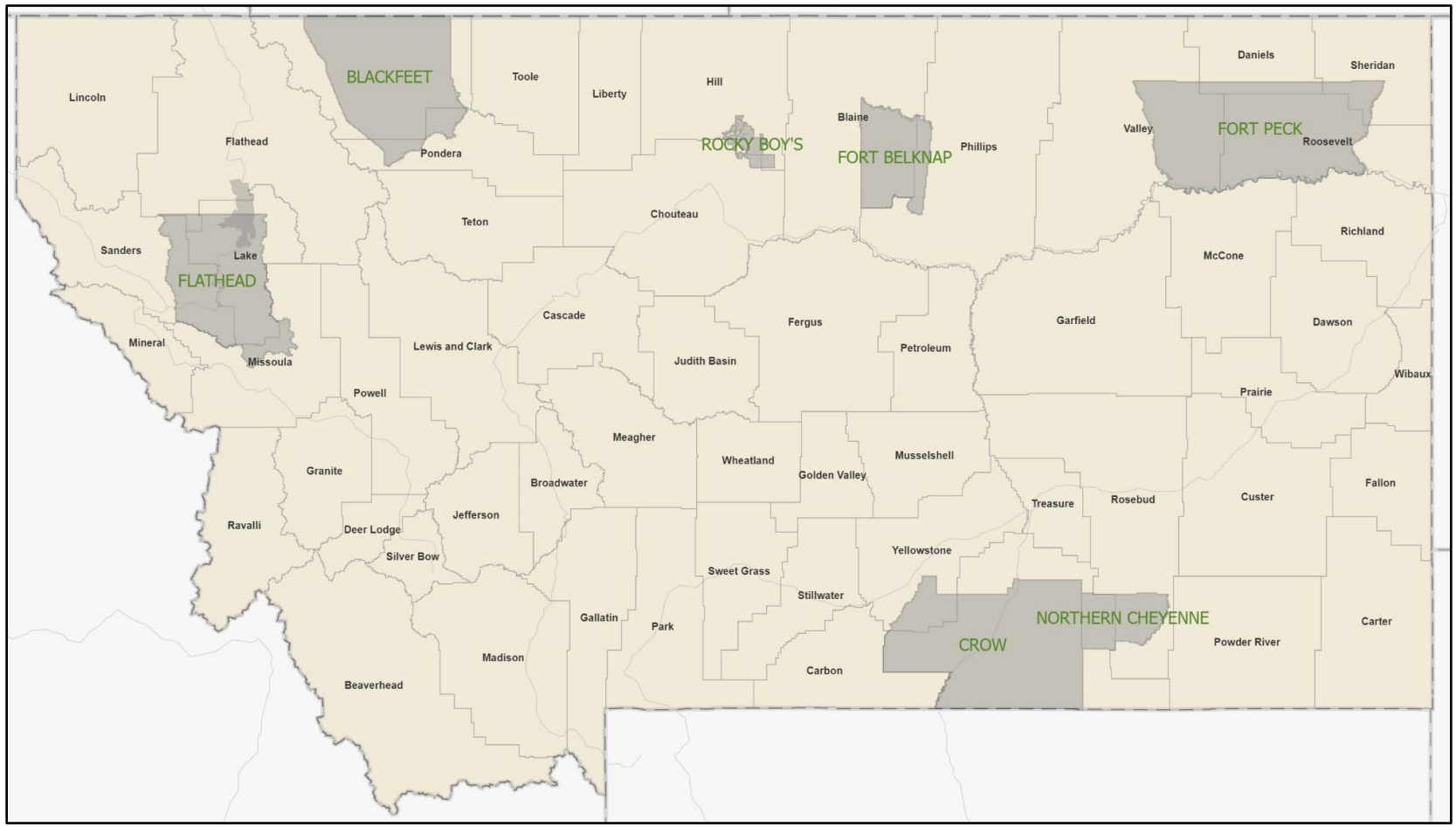
Data in the following sections has been collected from a variety of sources, including and primarily, the Affirmatively Furthering Fair Housing tool. This tool has been developed by HUD to provide jurisdictions with applicable data to evaluate the various measures of fair housing within their jurisdictions. The most recent version of this tool was released in 2020. When possible, this information is supplemented and updated with additional, more recent data. Supplemental data sources include the United States Census, American Community Survey, Home Mortgage Disclosure Act, and Comprehensive Housing Affordability Strategy.

In addition to the quantitative analysis of the data mentioned above, a number of qualitative data sources have been utilized in this analysis. These include findings from the public input process, the Fair Housing Survey, and input from stakeholders.

Service Area

Commerce, as the lead agency for this Fair Housing Equity Plan, represents the State of Montana. Commerce and DPHHS receive funding from HUD as part of Community and Planning Development formula grant funding. Other entities in the state that also receive this funding are known as entitlements and include the Cities of Billings, Great Falls and Missoula. This analysis looks at both statewide data as well as nonentitlement data when available and applicable. All references to nonentitlement areas in Montana include the entirety of Montana excluding Billings, Great Falls, and Missoula. Bozeman is also in the process of becoming an entitlement community; however, at the date of this study, any mention of nonentitlement areas will include the Bozeman area.

It is also important to note the seven American Indian reservations in Montana. These reservation areas are outside the jurisdiction of local and state government but are nonetheless a part of the state and, thus, a part of this Fair Housing Analysis. The map on the following page depicts the state and outlines its counties and the reservations within its borders. While this document uses the term American Indian to align with the state governor's Office of Indian Affairs, many data sources use the term Native American. In these instances, Native American and American Indian are used interchangeably.



Map of Montana counties and reservations

I. Demographics

The following section will discuss the demographics in Montana and how they have changed since 1990. In particular, this section will focus on the classes of people that are protected by state and federal fair housing law, including race, national origin, sex, familial status, and disability.

Demographics in Montana

Race and Ethnicity

The racial and ethnic groups in the nonentitlement areas of Montana have experienced a small shift since 1990 to include a more diverse makeup of residents. However, the White population still represents the vast majority of Montanans in nonentitlement areas of the state. The White population decreased from 91.4% in 1990 to 83.3% in 2020. Black, Asian or Pacific Islander, and American Indian populations all saw small increases in proportional representation. The Hispanic population grew from 1.3% in 1990 to 2.6% by 2020. See **Table I.1** for changes in race and ethnicity over time.

Table I.1: Race and Ethnicity

	1990 Trend		2000 Trend		2010 Trend		2020	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
White	556,529	91.4%	618,450	89.2%	666,393	87.8%	657,407	83.3%
Black	1,103	0.2%	2,275	0.3%	4,179	0.6%	2,648	0.3%
Hispanic	7,969	1.3%	11,912	1.7%	19,169	2.5%	28,565	3.6%
Asian or Pacific Islander	2,432	0.4%	4,558	0.7%	7,104	0.9%	5,371	0.7%
Native American	40,296	6.6%	54,443	7.9%	61,823	8.1%	53,132	6.7%

Data Source: HUD AFFH Tool, Census, ACS Nonentitlement Areas of Montana

National Origin and Limited English Proficiency

The percentage of Montana residents in nonentitlement areas that are foreign-born grew from 1.6% in 1990 to 2.0% in 2020. The most common country of origin is Canada, representing 710 people in the nonentitlement areas of the state. This is followed by Mexico and Germany. See **Table I.2** for more information about the national origin of Montana's residents.

Table I.2: National Origin

National Origin	Country	#	%
#1 country of origin	Canada	3,157	0.4%
#2 country of origin	Mexico	1,698	0.2%
#3 country of origin	Germany	1,348	0.2%
#4 country of origin	Other Eastern Europe	605	0.1%
#5 country of origin	Korea	604	0.1%
#6 country of origin	Other Western Europe	593	0.1%
#7 country of origin	Philippines	566	0.1%
#8 country of origin	China excl. Taiwan	548	0.1%
#9 country of origin	England	535	0.1%
#10 country of origin	Other South America	415	0.1%

Data Source: HUD AFFH Tool, Census, ACS Nonentitlement Areas of Montana

An estimated 0.7% of Montana's nonentitlement population has limited English proficiency, a decrease from 1.5% in 1990. Per HUD AFFH data presented in **Table I.3**, the most common language that people with LEP speak is Spanish, accounting for 1.5% of the Montana nonentitlement population. This data set also indicates that the second most common category of language that people with LEP speak in the state's nonentitlement population is Other & Unspecified, which captures but does not provide a detailed breakout of Montana's nine Native languages.[1]

Table I.3: Limited English Proficiency Language

National Origin	Language	#	%
#1 LEP Language	Spanish	10,647	1.1%
#2 LEP Language	Other & Unspecified Language	7,234	1.0%
#3 LEP Language	West Germanic Language	6,066	0.8%
#4 LEP Language	Other Indo-European Language	1,560	0.2%
#5 LEP Language	French	1,478	0.2%
#6 LEP Language	Other Asian & Pacific Language	960	0.1%
#7 LEP Language	Slavic Language	879	0.1%
#8 LEP Language	Tagalog	595	0.1%
#9 LEP Language	Chinese	544	0.1%
#10 LEP Language	Korean	337	0.1%

Data Source: HUD AFFH Tool, Census, ACS Nonentitlement Areas of Montana

Sex (including gender identity and sexual orientation)

The percentage of male and female residents has not shifted significantly over the years, with both male and female populations representing close to half of the overall Montana population since 1990. However, in older age groups, the female population tends to

[1] https://www.npr.org/2015/05/02/403576800/montana-offers-a-boost-to-native-language-immersion-programs?utm_medium=RSS&utm_campaign=education

represent a larger proportion of the population. For those 75 and older, the female population accounted for 54.7% versus 45.3% of the population, according to 2022 ACS 5-year estimates.

According to the Williams Institute, in 2023 there were 22,300 individuals identifying as lesbian, gay, bisexual, or transgender in Montana.[2] In 2023, 43 self-identified transgender individuals and 37 nonbinary individuals received services from homeless service providers, according to HMIS data. Per public input, gender identity discrimination is an ongoing issue in Montana that is often underreported.

Familial Status

Families with children accounted for 50.8% of the statewide population in 1990 and decreased to 41.3% by 2020. According to the 2022 ACS 5-year estimates, children under age 18 account for 21.2% of the population in Montana. Non-family households are considered to be one-person households or households with individuals not related by blood, adoption, or marriage.

Disability

The proportion of people with a disability in Montana has remained relatively steady between 2015 and 2022. As shown in **Table I.4**, older Montanans, or those aged 75 and older, have the highest rates of disability at 45.9% while Montanans ages 65 to 74 experience disabilities at a rate of 25.0%. Disability rates get precipitously lower with each younger age group.

Table I.4: Disability Rate

Age	2015	2022
Under 5 years	1.0%	0.9%
5 to 17 years	4.6%	5.7%
18 to 34 years	6.4%	8.4%
35 to 64 years	13.7%	13.3%
65 to 74 years	25.5%	25.0%
75 years and over	49.5%	45.9%

Data Source: 2015 and 2022 5-Year ACS State of Montana

Seniors

As Montana's population continues to age, this study considers changes in the elderly population or those over the age of 65. There were an estimated 211,501 people 65 and older in Montana in 2022, up from 147,972 a decade earlier. This group is growing faster than any other in the state. Taking this into consideration, seniors will be included in this

[2] https://williamsinstitute.law.ucla.edu/publications/discrimination-sogi-mt/stit

discussion when relevant and applicable. The terms seniors and elderly will be used interchangeably to mean people aged 65 and older unless otherwise noted.

Demographics in Publicly Supported Housing

Publicly supported housing is defined as housing that receives public assistance or subsidies, such as housing funded through Project Based Section 8, USDA Rural Housing, Low Income Housing Tax Credits, and other programs. Similar to their overall representation in the nonentitlement areas of the state, the White population in publicly supported housing units accounts for 91.2% (see **Table I.5**). Black, Hispanic, and Asian or Pacific Islander populations also represent percentages similar to their statewide representation by race or ethnicity (see **Table I.5**). Compared with data from 2017, racial and ethnic distributions in publicly supported housing units are similar to the most recent data available in the AFFH database.

Table I.5: Race and Ethnicity in Publicly Supported Housing

Publicly Supported Housing	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Category	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Public Housing	882	89.9%	11	1.1%	34	3.5%	6	0.6%
Project-Based Section 8	1,748	86.1%	16	0.8%	75	3.7%	7	0.3%
Other Multifamily	214	90.7%	1	0.4%	9	3.8%	1	0.4%
Housing Choice Voucher Program	2,386	84.3%	28	1.0%	97	3.4%	14	0.5%
Total Households	**284,478**	**91.2%**	**648**	**0.2%**	**6,282**	**2.0%**	**1,399**	**0.5%**
0-30% of AMI	35,576	83.5%	177	0.4%	1,223	2.9%	195	0.5%
0-50% of AMI	71,466	85.6%	239	0.3%	2,379	2.9%	371	0.4%
0-80% of AMI	126,896	87.7%	374	0.3%	3,645	2.5%	653	0.5%

Data Source: HUD AFFH Tool Nonentitlement Areas of Montana

Demographics in Public Housing

In public housing units, an estimated 89.9% are White, 1.1% are Black, 0.6% are Asian or Pacific Islander and 3.5% are Hispanic. Compared with data from 2017, racial and ethnic distributions in public housing units are similar to the most recent data available in the AFFH database.

Summary

Demographics in the nonentitlement areas of Montana have shifted as a whole and within the protected classes. While becoming more racially and ethnically diverse, Montanans are also seeing lower rates of families with children and fewer people with LEP. The demographics in

publicly supported housing closely mimic the racial and ethnic makeup of the nonentitlement areas as a whole, as does the population in public housing.

II. Segregation and Integration

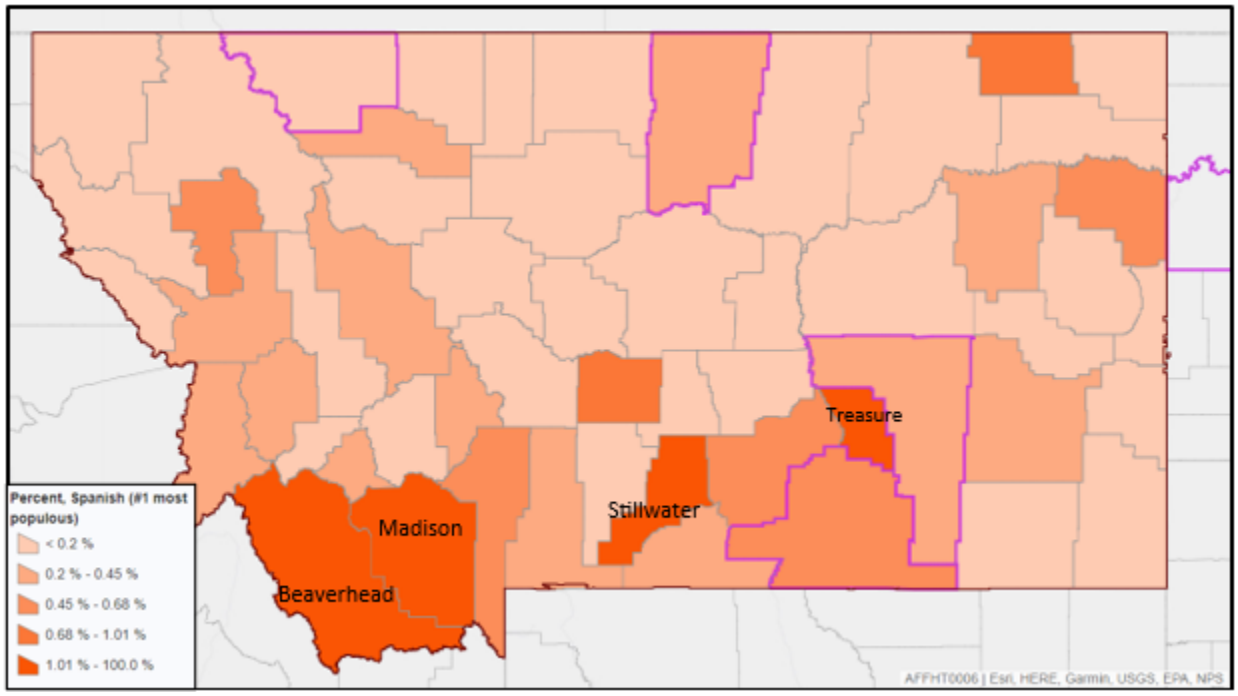
Segregation is defined as the action or state of setting someone or something apart from others. This section will analyze data for various groups to determine whether segregation exists based on these measures. This will include an analysis of household data including limited English proficiency, national origin, race and ethnicity, and disability.

Limited English Proficiency and National Origin

As discussed previously, Spanish is the most spoken language in Montana for those with LEP. As shown in **Map II.1**, the counties with the highest LEP Spanish percentage of the overall population include Beaverhead, Madison, Stillwater, and Treasure. However, the LEP Spanish-speaking population accounts for between 1.0% and 1.8% of the total population in these counties. Other languages represent very small proportions of the population statewide.

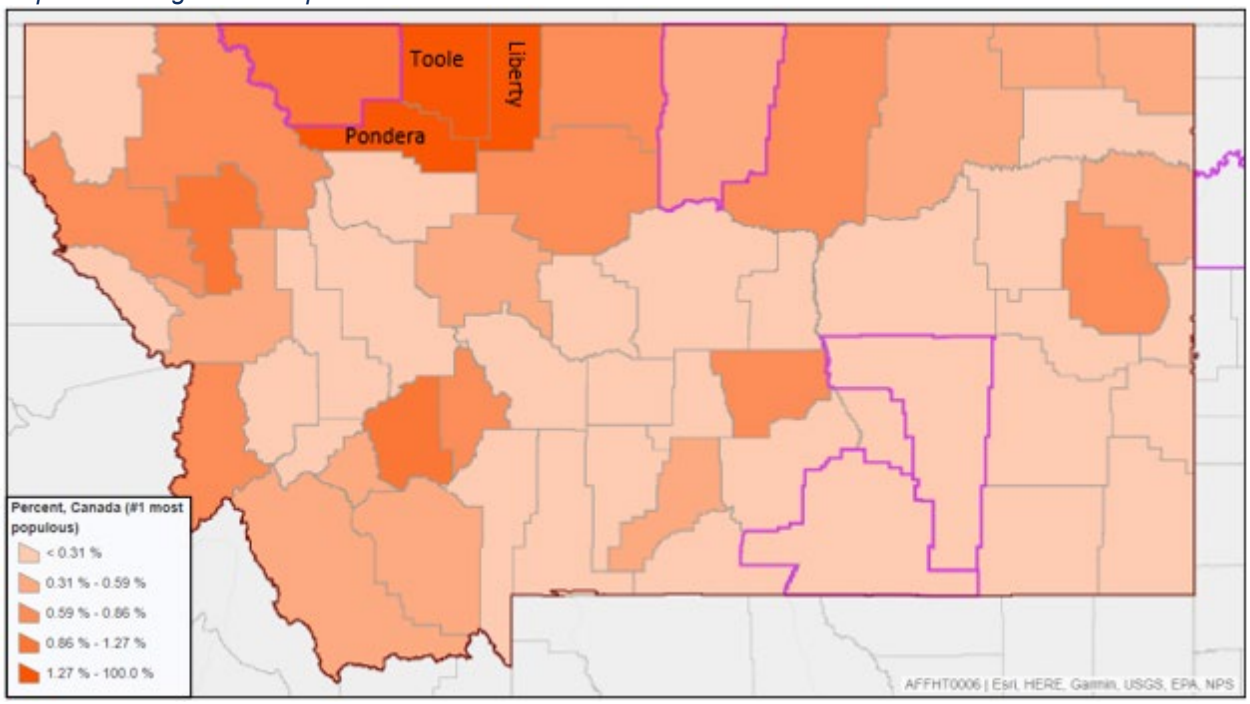
The most common country of origin for foreign-born citizens is Canada. As shown in **Map II.2**, northern counties in Montana have the highest proportion of Canadian-born citizens, at the highest of 2.2% in Toole County. This is followed by 2.0% in Liberty County and 1.4% in Pondera County. All other foreign-born populations represent very small proportions statewide.

Map II.1: Limited English Proficiency - Spanish Speaking



Data Source: HUD AFFH Tool

Map II.2: Foreign-Born Populations - Canada



Data Source: HUD AFFH Tool

Race and Ethnicity

The rate of segregation in an area is evaluated by the dissimilarity index. This index provides a quantitative measure of segregation in an area, based on the rate at which two different racial groups are distributed in neighboring census tracts. These calculations allow the user to see whether there are areas with higher concentrations of segregation in any parts of the subject area, in this instance throughout Montana.

The dissimilarity index (or the index of dissimilarity) is a commonly used measure of community-level segregation. It represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups.[3] The index is calculated as:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^{N} \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

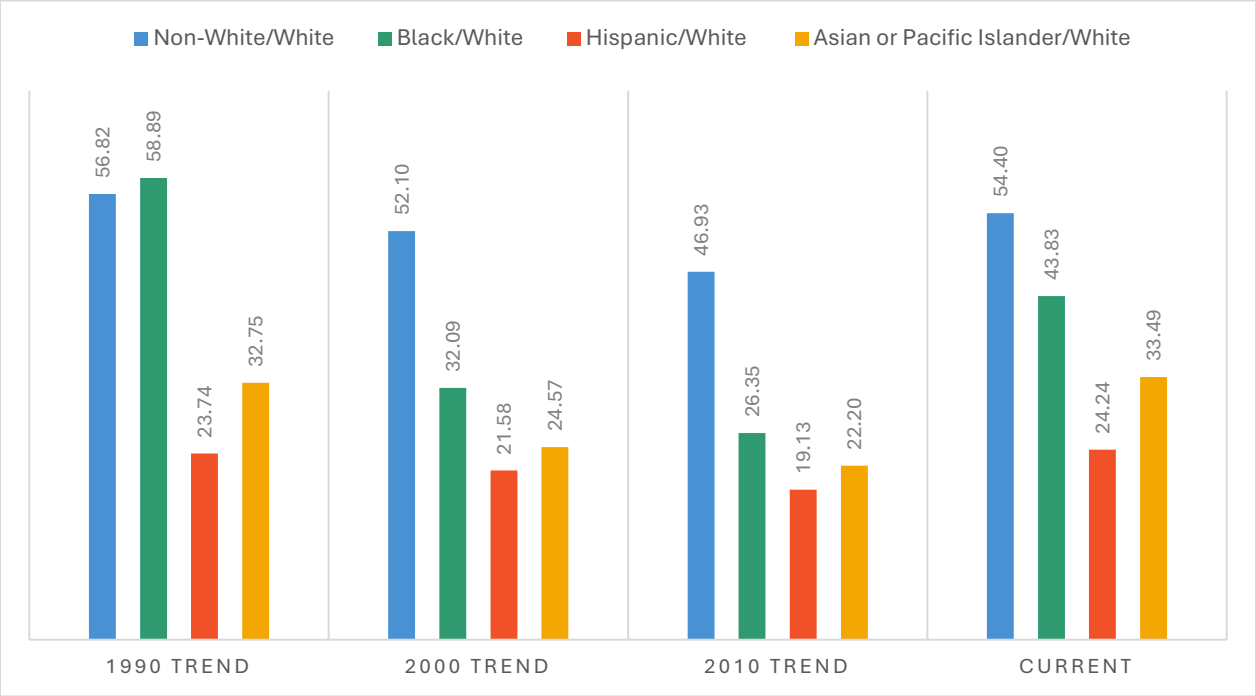
Where *i* indexes census block groups or tracts, *j* is the *jth* jurisdiction, *W* is group one and *B* is group two, and *N* is the number of block groups or tracts *i* in jurisdiction *j*. The higher the dissimilarity index value, the higher the level of segregation in an area, as seen in **Diagram II.1** on the following page.

Dissimilarity Index	
Low Segregation	<40
Moderate Segregation	40-54
High Segregation	>55

For the nonentitlement areas of Montana, recent trends have seen low to moderate levels of segregation. White versus non-White households see the highest rates of segregation, at 54.40 in current trends, which increased from 46.93 in 2010. Black versus White households see moderate levels of segregation at 43.83 currently, up from 26.35 in 2010. Asian or Pacific Islander versus White segregation is low at 33.49, up from 22.20 in 2010. Hispanic versus White segregation is low at 24.24, which is a slight increase from 19.13 in 2010.

[3] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf

Diagram II.1: Racial/Ethnic Dissimilarity Index



Data Source: HUD AFFH Tool

Nonentitlement Areas of Montana

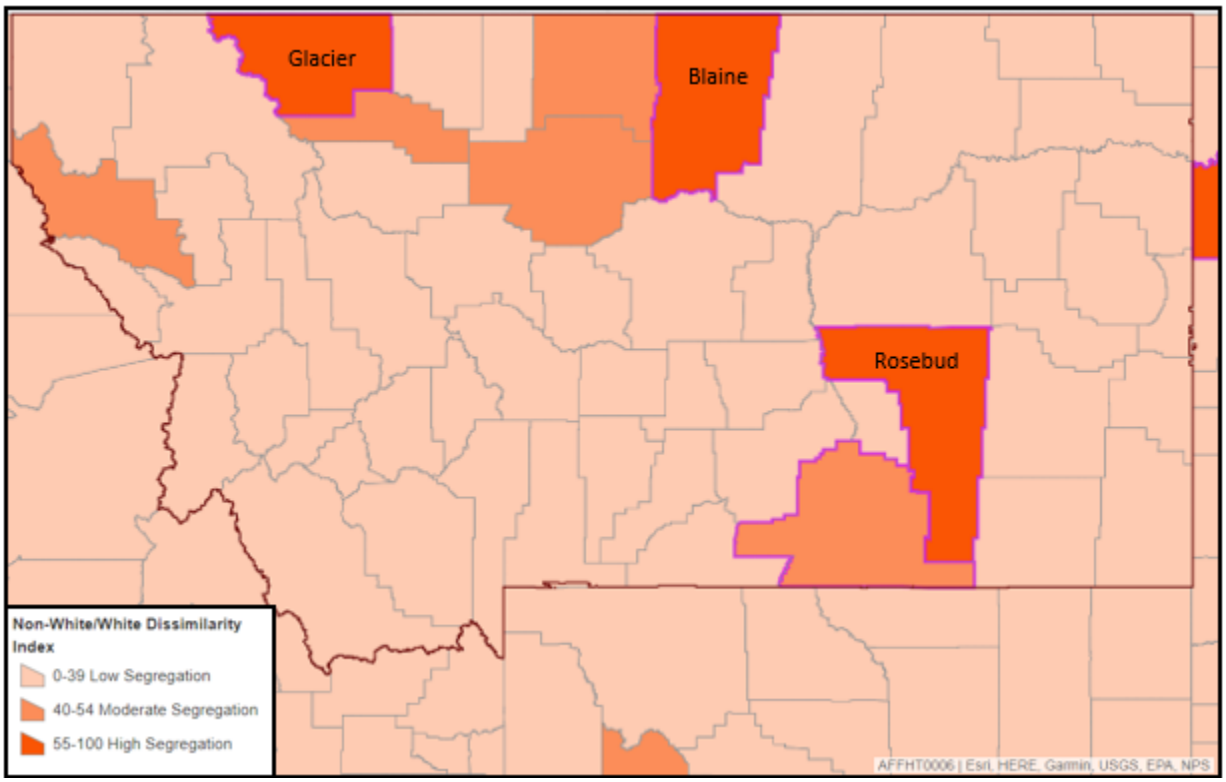
Geographic Distribution

When looking at the dissimilarity index geographically, it can be compared as White versus non-White populations, White versus Asian or Pacific Islander populations, White versus Black populations, and White versus Hispanic populations. Maps showing these comparisons are presented on the following two pages.

The highest levels of dissimilarity between White and non-White populations are seen in northern and eastern Montana, in Glacier, Blaine, and Rosebud counties (see **Map II.3**). These patterns are similar to 2010 as seen in **Map II.4**. While not shown in the federally available dissimilarity index data, these areas have high concentrations of American Indian households and are discussed in more detail in the following sections.

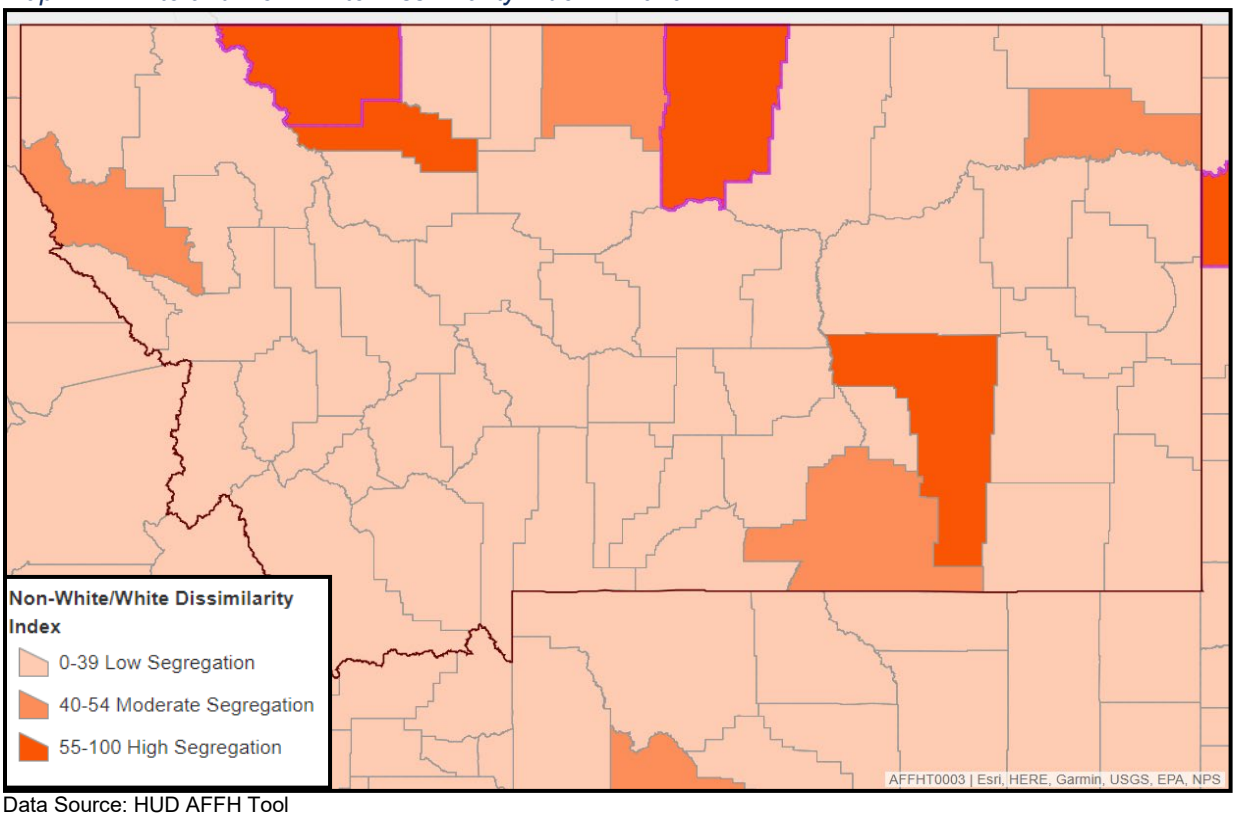
As for other racial and ethnic groups, geographically, there are no areas with higher rates of dissimilarity index ratings between White and Asian or Pacific Islander populations (see **Map II.5**). Black and White dissimilarity index ratings are higher in Blaine County (see **Map II.6**), and between White populations and Hispanic populations, it is highest in Blaine and Glacier counties (see **Map II.7**). Some of these concentrations of racial and ethnic groups extend outside the boundaries of Montana, particularly in North Dakota with Asian or Pacific Islander or Hispanic households.

Map II.3: White and Non-White Dissimilarity Index



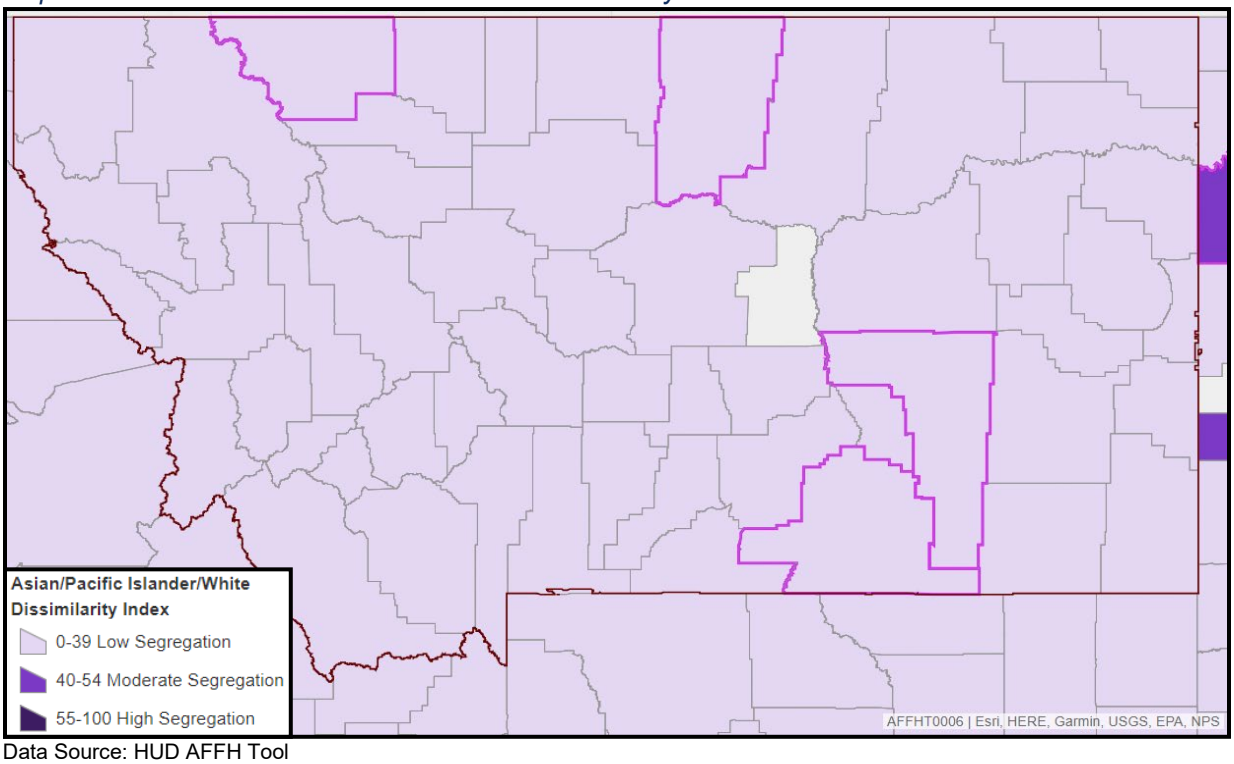
Data Source: HUD AFFH Tool

Map II.4: White and Non-White Dissimilarity Index in 2010



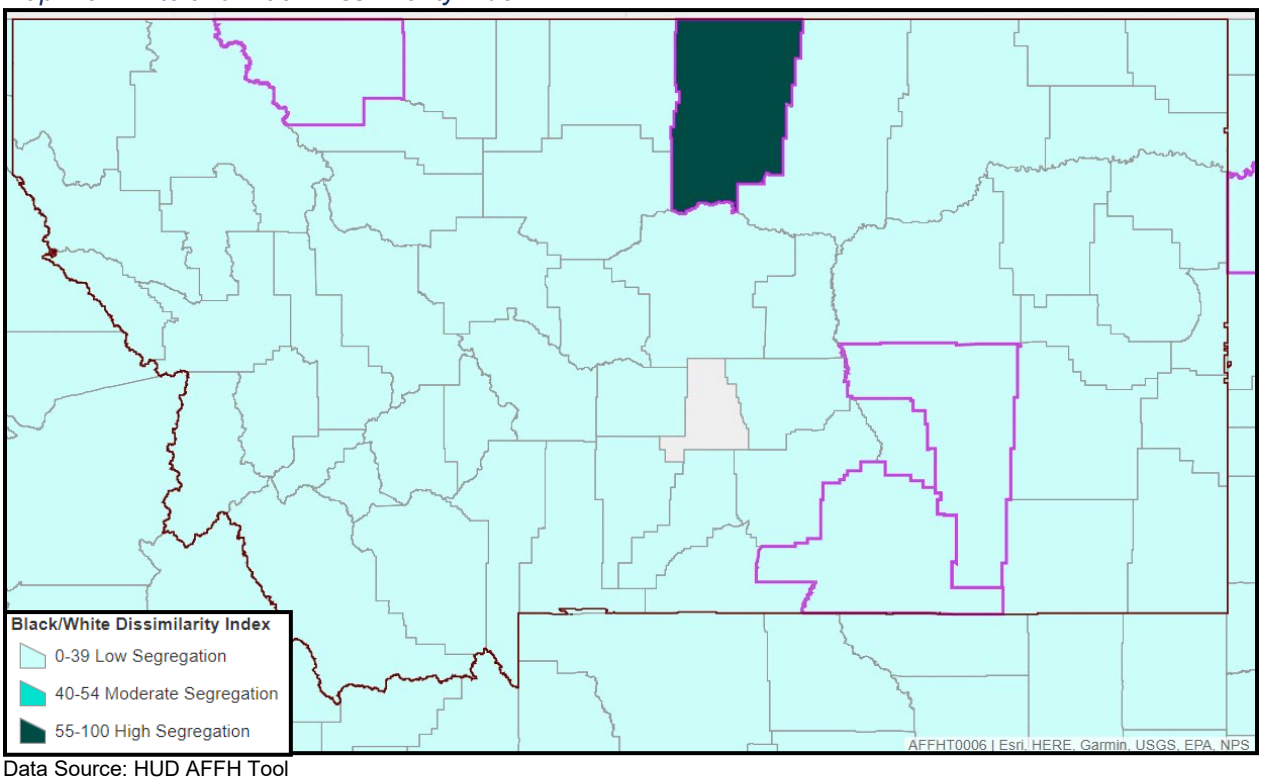
Data Source: HUD AFFH Tool

Map II.5: White and Asian or Pacific Islander Dissimilarity Index



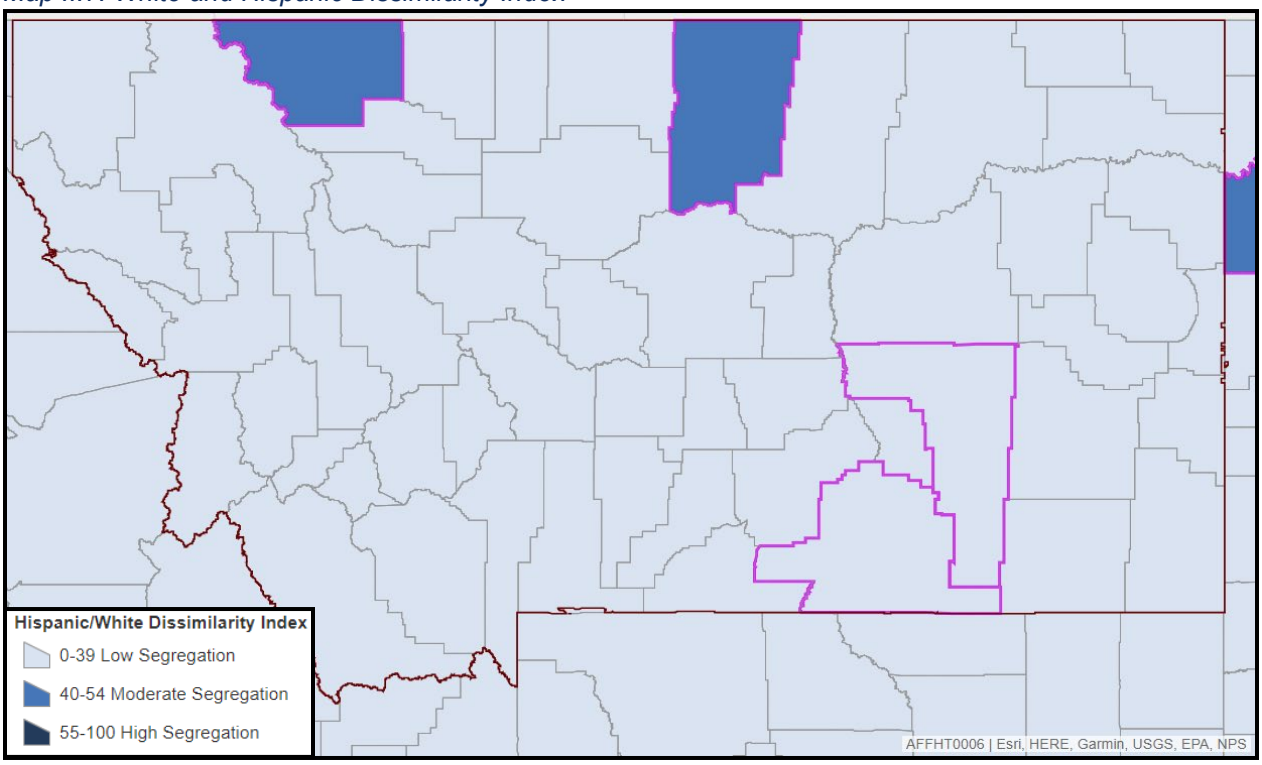
Data Source: HUD AFFH Tool

Map II.6: White and Black Dissimilarity Index



Data Source: HUD AFFH Tool

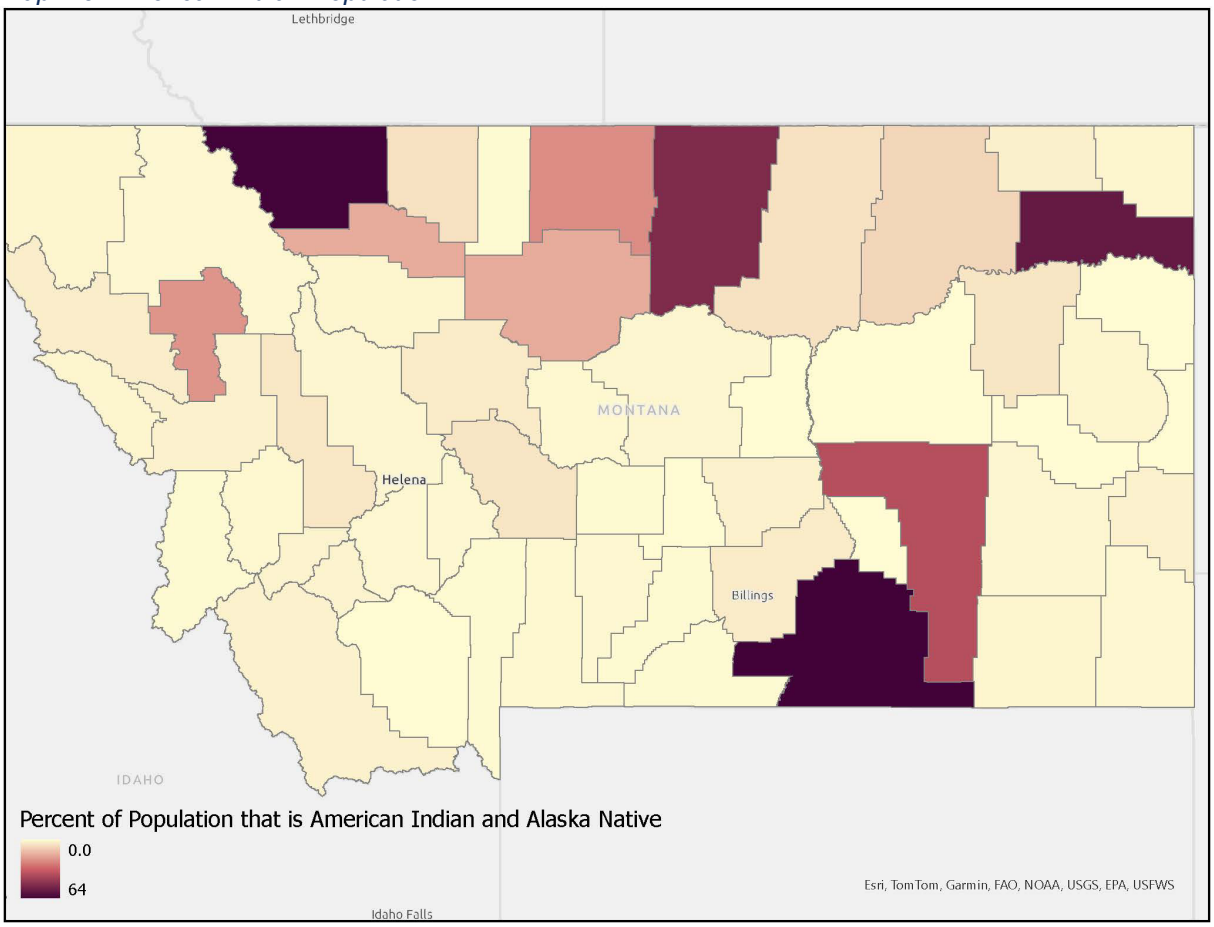
Map II.7: White and Hispanic Dissimilarity Index



Data Source: HUD AFFH Tool

Federally available data does not provide the dissimilarity index for White versus Native American or American Indian populations. As the American Indian population in Montana is large and diverse, this study is incorporating additional data to supplement federal data sources. **Map II.8**, on the following page, shows the concentration of the American Indian population in Montana. This is shown by county boundaries. Later in this study, these areas will be discussed in their relationship to American Indian reservations. The highest concentrations of American Indians are seen in Glacier County with 65.9% of the population identifying as American Indian or Alaskan Native, Big Horn County with 65.7%, Roosevelt County with 57%, and Blaine County with 51.4%. This data corresponds heavily to White and non-White dissimilarity, as seen in **Maps II.3** and **II.4**, leaving the conclusion that the level of segregation between White and American Indian populations is moderate to high in these areas. While segregation is noted, it must be considered within the context of occurring on or near American Indian reservations, which have de facto higher concentrations of American Indian households.

Map II.8: American Indian Population



Data Source: 2020 Census

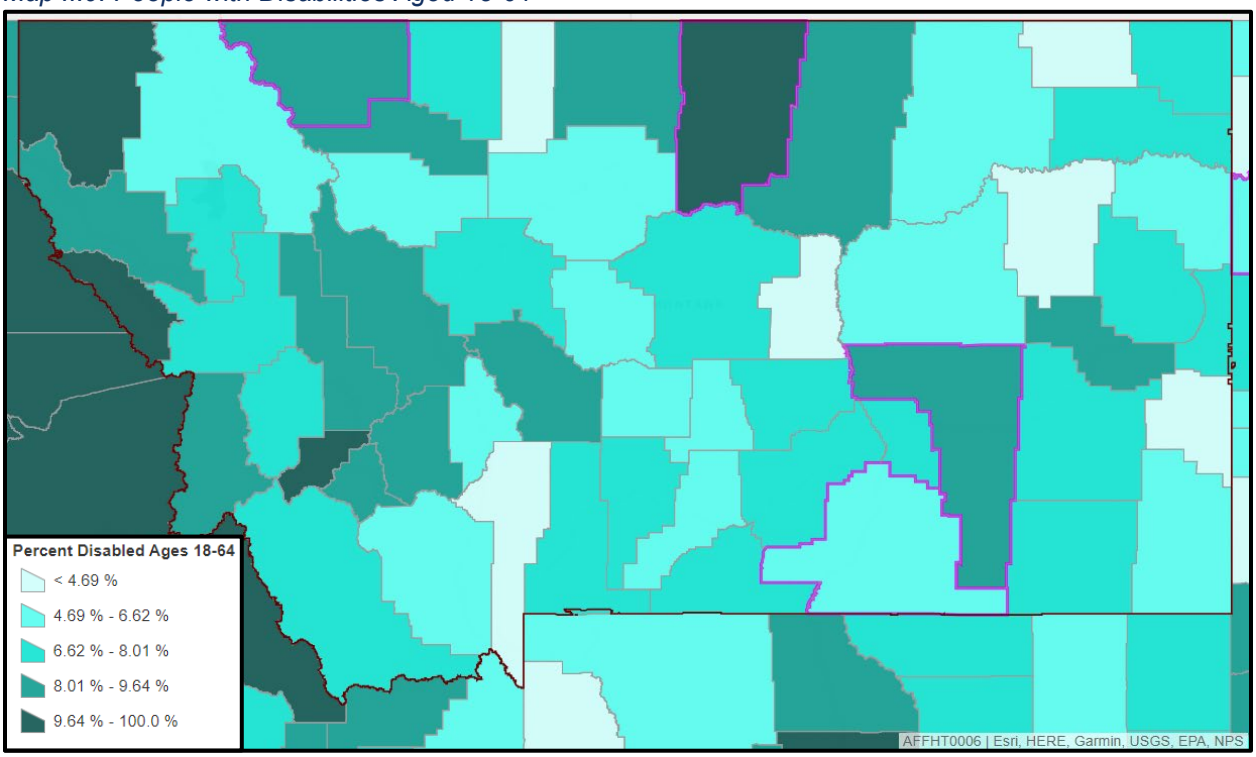
People with Disabilities and Seniors

There are several areas with higher concentrations of people with disabilities in Montana. However, none of these areas represent disproportionately higher rates of people with disabilities. This is true for both working-age adults and the elderly population. The areas with the highest rates of disabilities are shown in **Maps II.9** and **II.10**, with the darkest parts of the maps representing areas where disability rates are higher than 9.6% for working-age adults and 10.3% for the elderly population.

Public input suggests that while there is not a disproportionate share of individuals with disabilities in a specific area or region, this population faces persistent difficulties in accessing housing and needs continued support. This is especially true for subsidized housing with wait lists, that may not prioritize people with disabilities to access ADA-compliant units, causing additional wait times for these individuals. In addition, public input suggested the continued need for visitability standards for housing and public facilities.

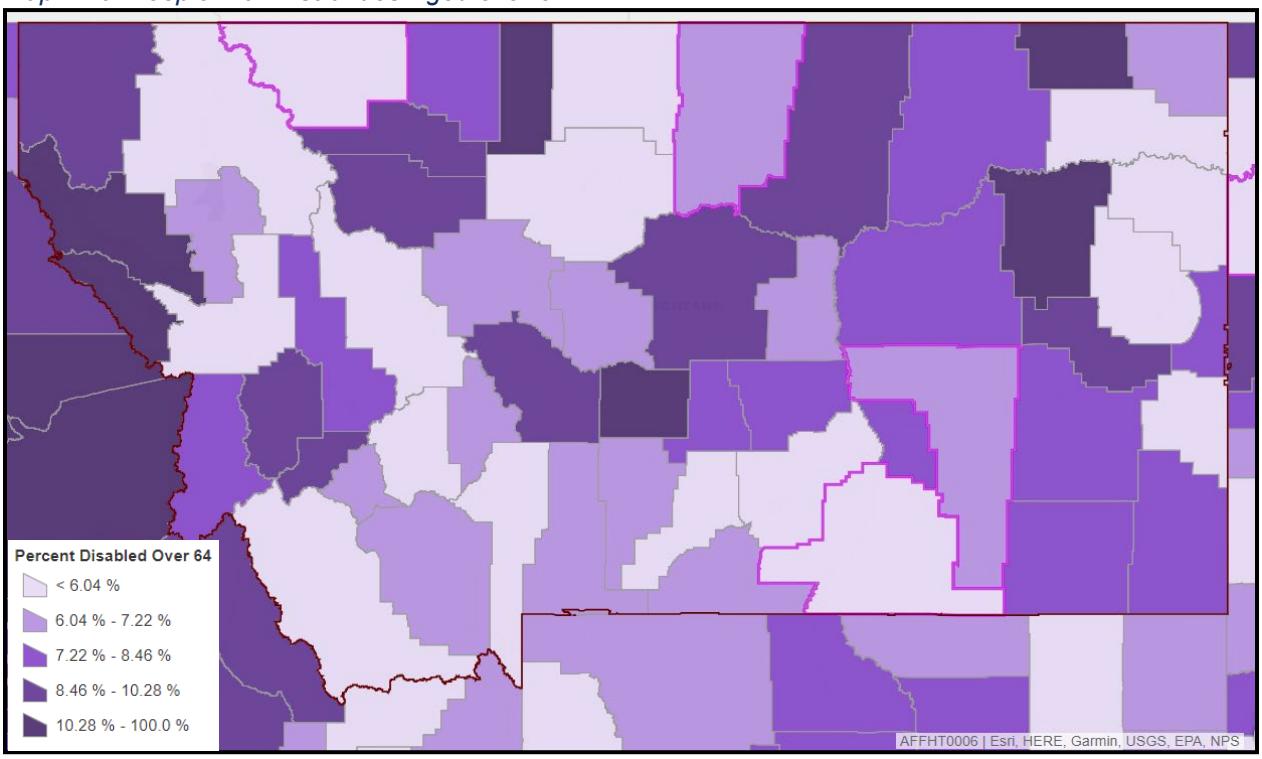
In terms of geographic distribution, some concentrations of people with disabilities extend outside the boundaries of Montana, particularly into Idaho for working-age adults and elderly adults.

Map II.9: People with Disabilities Aged 18-64



Data Source: HUD AFFH Tool

Map II.10: People with Disabilities Aged over 64



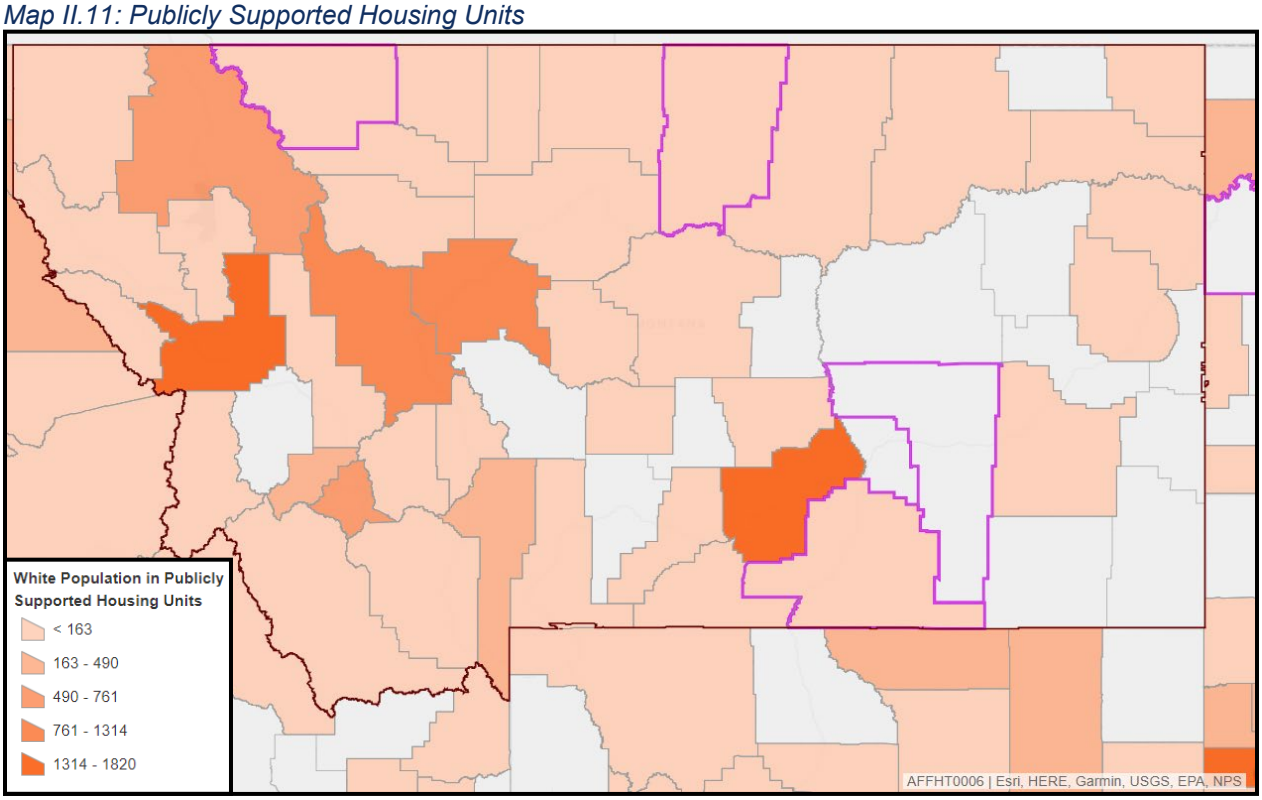
Data Source: HUD AFFH Tool

Publicly Supported Housing and Segregation

Publicly supported housing is located, generally, in areas with higher population concentrations, as seen in **Map II.11**. These areas do not tend to have higher rates of segregation based on the dissimilarity index.

In general, the population residing in publicly supported housing units in the nonentitlement areas of Montana aligns with the racial and ethnic makeup of the state as a whole. The White population accounts for 91.2% of the population in publicly supported housing versus 83.3% of the population as a whole. The Hispanic population accounts for 2.0% of the population in publicly supported housing compared to 3.6% of the population as a whole. The demographics of publicly supported housing for all groups specified in the AFFH database are presented in **Table II.1**.

Map II.11: Publicly Supported Housing Units



Data Source: HUD AFFH Tool

Table II.1: Publicly Supported Housing Demographics

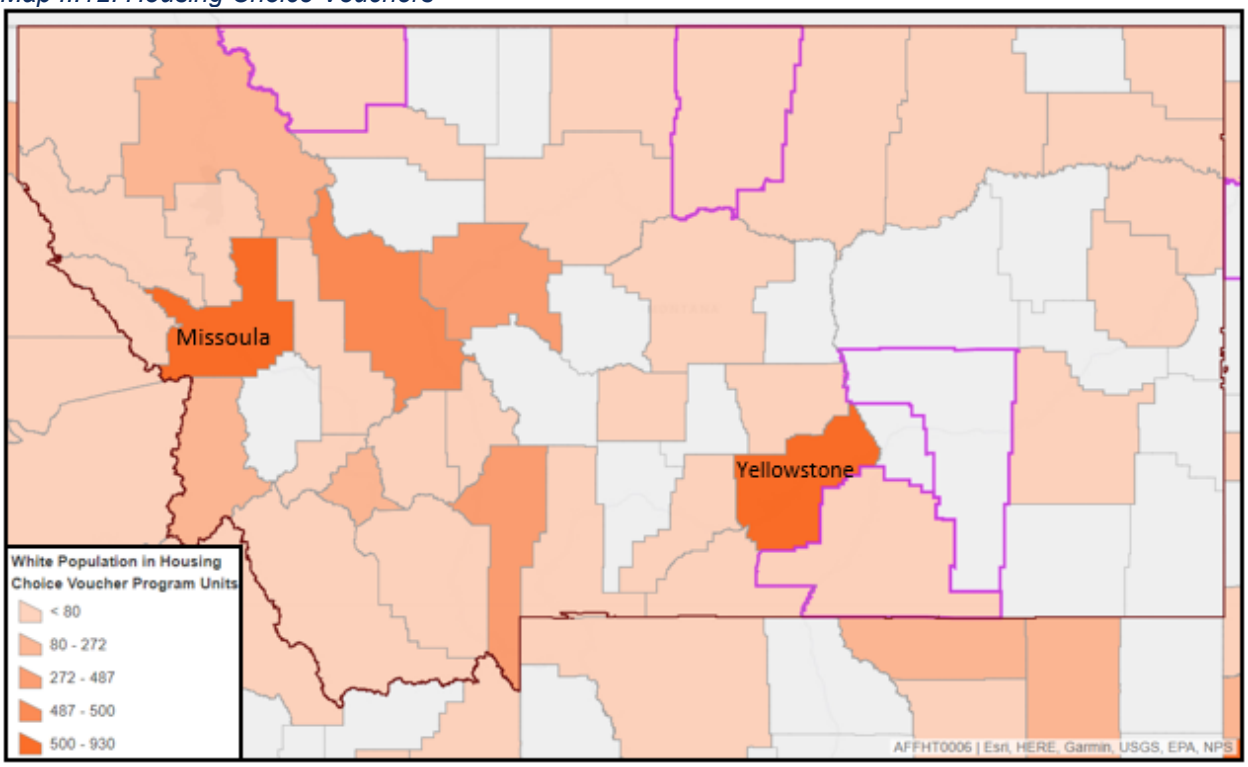
Publicly Supported Housing	White		Black		Hispanic		Asian or Pacific Islander	
Housing Category	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Public Housing	882	89.9%	11	1.1%	34	3.5%	6	0.6%
Project-Based Section 8	1,748	86.1%	16	0.8%	75	3.7%	7	0.3%
Other Multifamily	214	90.7%	1	0.4%	9	3.8%	1	0.4%
Housing Choice Voucher Program	2,386	84.3%	28	1.0%	97	3.4%	14	0.5%
Total Households	**284,478**	**91.2%**	**648**	**0.2%**	**6,282**	**2.0%**	**1,399**	**0.5%**
0-30% of AMI	35,576	83.5%	177	0.4%	1,223	2.9%	195	0.5%
0-50% of AMI	71,466	85.6%	239	0.3%	2,379	2.9%	371	0.4%
0-80% of AMI	126,896	87.7%	374	0.3%	3,645	2.5%	653	0.5%

Data Source: HUD AFFH Database

Nonentitlement Areas of Montana

As shown in **Map II.12**, Housing Choice Vouchers have the highest rate of use in Yellowstone and Missoula counties, which are some of the most populous counties in the state. Conversely, the areas with the lowest population also tend to have the lowest rate of voucher use. The areas of highest voucher use do not correspond to areas with higher rates of segregation according to the measures above.

Map II.12: Housing Choice Vouchers



Data Source: HUD AFFH Tool

Overall, publicly supported housing units and voucher use do not correlate with areas of segregation. As discussed in the next section, public assistance is not disproportionately occurring within racially or ethnically concentrated areas of poverty in the state. As Montana is shifting demographically, as well as economically, areas with higher populations and lower median incomes tend to have the highest rates of housing assistance. While the median income in Yellowstone County stands above the state average at $79,283, an estimated 46.7% of households earn less than the median income for the county. Within those, 20.7% of households earn less than $35,000 in Yellowstone County. The median income in Missoula County is closer to the state average at $68,305. However, 38.5% of the population makes less than that average and 22.9% of households earn less than $35,000.

Summary

Areas of segregation in Montana are primarily seen when looking at racial concentrations of American Indian populations. These are predominantly counties that are within or near American Indian reservations. The dissimilarity index found that these geographic areas had high levels of segregation even though the overall calculation for the state remains low. Other racial and ethnic groups show low levels of segregation in the state overall.

With such small foreign-born and limited English proficiency populations, any concentrations are not significant in proportion to the overall population. In addition, while there are areas in the state with higher rates of people with disabilities, there are no areas with a disproportionate share. Publicly supported housing, likewise, does not tend to be concentrated in areas with higher levels of segregation, but tends to be found in areas with a larger share of the overall population.

III. R/ECAPS

Racially or ethnically concentrated areas of poverty are geographic areas that have relatively high levels of households living in poverty and higher levels of racial and ethnic minorities. To be considered a R/ECAP, an area must have at least 40% of the population living in poverty and at least 50% of the population must be a (non-White) racial or ethnic minority.

As shown in **Table III.1**, there are 11,573 Montanans living in R/ECAPs. This includes over 10,000 American Indians, 558 White persons, and 362 Hispanic persons. An estimated 90.5% of Montanans living in R/ECAPs are American Indians. Other racial and ethnic groups reside in R/ECAPS in much lower proportions, with the White population making up 4.8% of R/ECAPs, the Hispanic population accounting for 3.1%, and the Black and Asian populations both accounting for 0.1%.

Table III.1: R/ECAP Population by Race and Ethnicity

R/ECAP Race/Ethnicity	#	%
Native American, Non-Hispanic	10,477	90.5%
White, Non-Hispanic	558	4.8%
Hispanic	362	3.1%
Asian or Pacific Islander, Non-Hispanic	12	0.1%
Black, Non-Hispanic	11	0.1%
Other, Non-Hispanic	3	0.0%
Total Population in R/ECAPs	11,573	

Data Source: HUD AFFH Tool Nonentitlement Areas of Montana

As shown in **Table III.2**, an estimated 53.1% of households living in R/ECAPs are families with children, accounting for 1,333 families.

Table III.2: R/ECAP Population by Family Type

R/ECAP Family Type	#	%
Families with children	1,333	53.1%
Total Population in R/ECAPs	11,573	

Data Source: HUD AFFH Tool Nonentitlement Areas of Montana

As presented in **Table III.3**, the most common foreign national origin for households living in R/ECAPs in Montana is Germany, accounting for 28 people, followed by Canada and Mexico, accounting for 14 each.

Table III.3: R/ECAP Population by Race and Ethnicity

R/ECAP National Origin	#	%
Germany	28	0.2%
Canada	14	0.1%
Mexico	14	0.1%
Japan	8	0.1%
Other South Eastern Asia	8	0.1%
Other Central America	5	0.0%
Other Eastern Europe	4	0.0%
Cuba	2	0.0%
China excl. Taiwan	1	0.0%
Total Population in R/ECAPs	11,573	

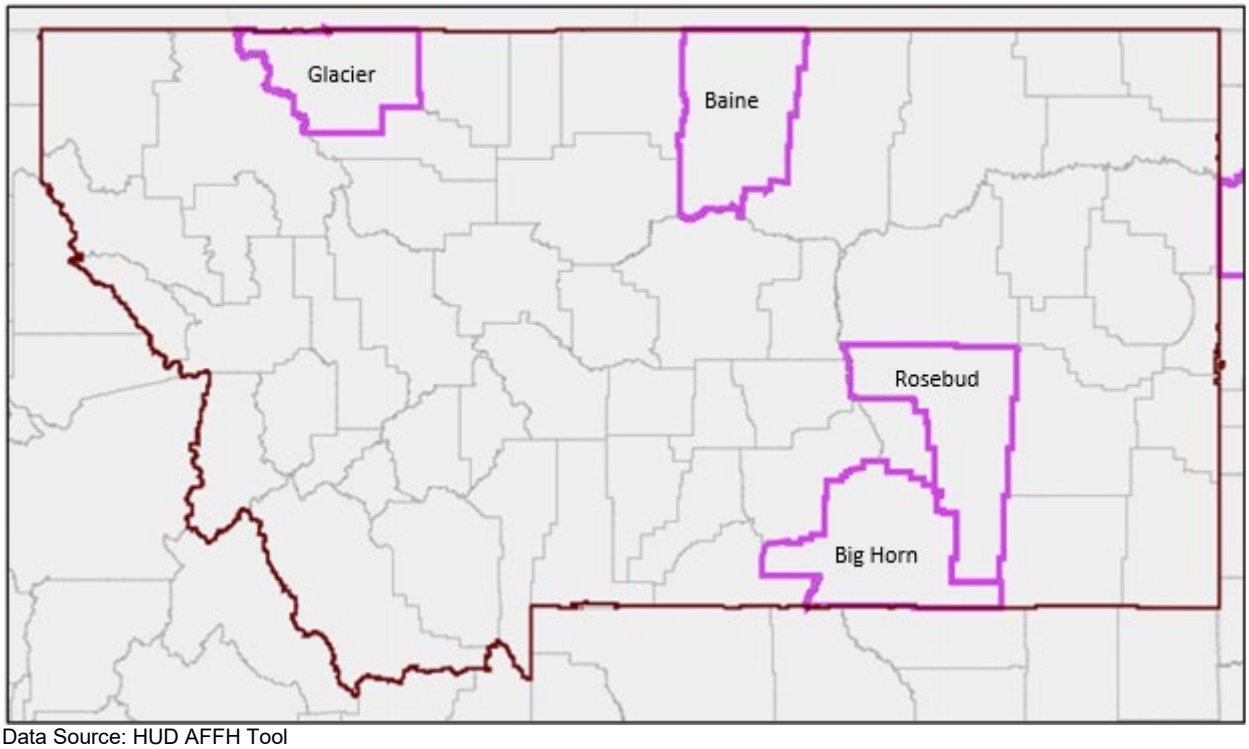
Data Source: HUD AFFH Tool Nonentitlement Areas of Montana

The R/ECAPs in Montana are shown in **Map III.1**, outlined in purple on the following page. They are present in Glacier, Blaine, Rosebud and Big Horn counties. In 2010, the R/ECAPs included only Glacier and Blaine counties. American Indians are the minority group primarily present in the R/ECAPs as seen in the tables above, as well as in **Map II.8**, in the previous section. All four of the counties that are classified as R/ECAPs contain American Indian reservations. An estimated 71% of Glacier County is within the Blackfeet Reservation. The Crow Reservation is primarily situated in Big Horn County. The Fort Belknap Reservation is partially located in Blaine County, and the Northern Cheyenne Indian Reservation is located in both Big Horn and Rosebud counties.

Publicly Supported Housing and R/ECAPs

As shown in **Maps II.11** and **II.12**, in the previous section, higher rates of publicly supported housing or voucher use do not correspond to R/ECAPs. In fact, all four counties that are considered R/ECAPs contain 3.5% of publicly supported housing units for the state, according to the AFFH database. In addition, an estimated 1.4% of Housing Choice Vouchers are used within R/ECAPs.

Map III.1: R/ECAPs



Data Source: HUD AFFH Tool

Summary

R/ECAPs correlate with counties that include or are proximal to American Indian reservations. R/ECAPs have disproportionately high rates of American Indian households compared with other racial and ethnic groups. About half of the households in R/ECAPs are families with children. Publicly supported housing units are not disproportionately located in R/ECAPs.

IV. Access to Community Assets

In an effort to quantify neighborhood opportunities, HUD has identified seven indices to value the level of access to opportunity based on geographic location. These measures can be used to compare geographic neighborhoods, counties, and, in this instance, areas across the state for level of access to these opportunities. These include access to education, employment, transportation, low poverty, and environmental health. Although there are limitations to these calculations, they provide a guide to evaluating geographic areas based on access to opportunity and assessing whether certain populations have disproportionately less access to these opportunities. As described in the excerpt below, HUD evaluates these indices by geographic location and by race and ethnicity, allowing for interpretation about access based on these two factors.

> *HUD used a two-stage process for developing the data needed to analyze disparities in access to opportunity. The first stage involves quantifying the degree to which a neighborhood offers features commonly viewed as important opportunity indicators. In the second stage, HUD compares these rankings across people in particular racial and economic subgroups to characterize disparities in access to opportunities. To focus the analysis, HUD developed methods to quantify a selected number of the important opportunity indicators in every neighborhood. These dimensions were selected because existing research suggests they have a bearing on a range of individual outcomes. HUD has selected five dimensions upon which to focus: poverty, education, employment, transportation, and health.*[4]

The following discussion will describe in finer detail these seven indices of opportunity, and specifically how disparities exist among residents of protected classes to avail themselves of these opportunities. HUD defines seven distinct index indicators, each having a value between 0 and 100:

- School Proficiency Index
- Labor Market Engagement Index
- Jobs Proximity Index
- Low Transportation Cost Index
- Transit Trips Index
- Low Poverty Index
- Environmental Health Index

Table IV.1 shows all opportunity index values by race/ethnicity for Montana with the exception of the Jobs Proximity Index, which is only provided in map form. Each of these indices are described in more detail in the following sections. HUD's AFFH Tool looks at this data through the lens of the following racial and ethnic groups: Asian or Pacific Islander, non-Hispanic; Black, non-Hispanic; American Indian, non-Hispanic; White, non-Hispanic; and Hispanic.

[4] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf

Table IV.1: Access to Opportunity Indices

Montana	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Environmental Health Index
Total Population						
White, Non-Hispanic	52.48	53.03	61.23	31.68	29.34	90.22
Black, Non-Hispanic	52.06	49.35	58.32	36.50	35.03	88.28
Hispanic	47.40	46.72	56.67	33.68	33.60	88.13
Asian or Pacific Islander, Non-Hispanic	53.65	56.76	63.80	37.75	35.32	88.42
Native American, Non-Hispanic	23.52	21.60	29.24	23.87	16.78	93.81
Population below federal poverty line						
White, Non-Hispanic	45.94	51.82	56.75	31.35	30.36	89.45
Black, Non-Hispanic	46.10	50.04	57.53	42.19	34.68	88.64
Hispanic	40.54	44.42	49.07	31.41	32.79	87.79
Asian or Pacific Islander, Non-Hispanic	54.21	56.02	66.53	32.05	36.83	84.79
Native American, Non-Hispanic	21.24	24.23	29.83	23.42	18.43	93.19

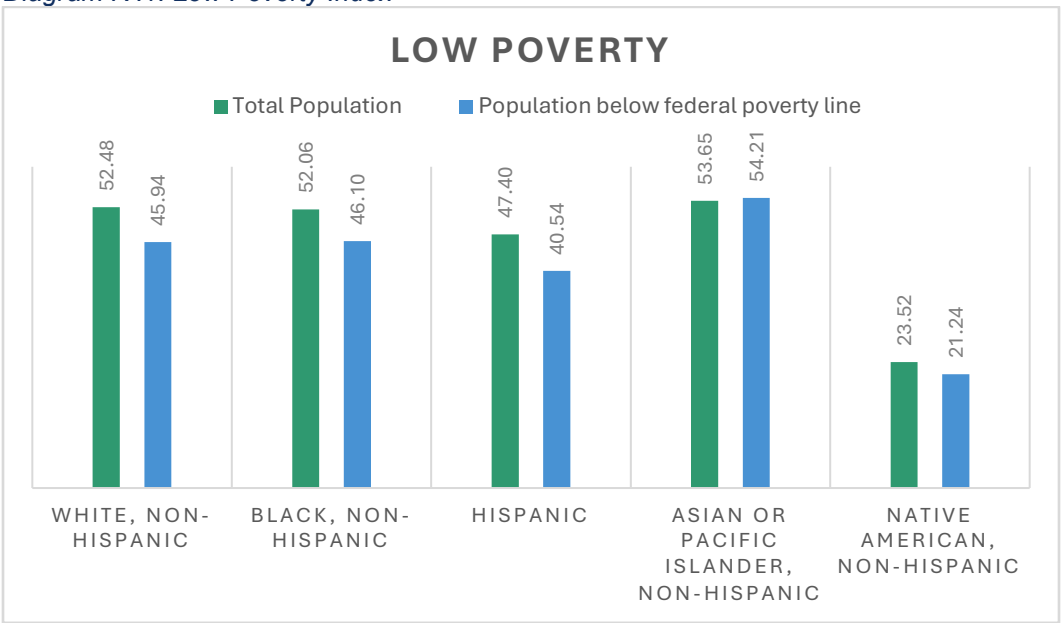
Data Source: HUD AFFH Tool (Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA)

Low Poverty

The Low Poverty Index uses rates of household poverty based on the federal poverty line to measure exposure to poverty by census tract. A higher score indicates less exposure to poverty for a given census tract. Each calculation is given a value from 1 to 100 and ranked nationally.[5] A higher index rating means that a household is more likely to live in a low-poverty area.

Diagram IV.1 presents Montana's Low Poverty Index by race and ethnicity. American Indian households have markedly less access to low-poverty areas than other racial and ethnic groups in the state, meaning American Indian households are more likely to be living in high-poverty areas. At an index rating of 23.52 for the total American Indian population, it is disproportionately lower than all the other racial and ethnic groups in Montana. Asian or Pacific Islander households have the highest rate of access to low-poverty areas at 53.65 for the total population, followed by White households at 52.48, Black households at 52.06, and Hispanic households at 47.40. Populations living below the federal poverty line have, unsurprisingly, less access to low-poverty areas, aside from Asian or Pacific Islander households.

Diagram IV.1: Low Poverty Index



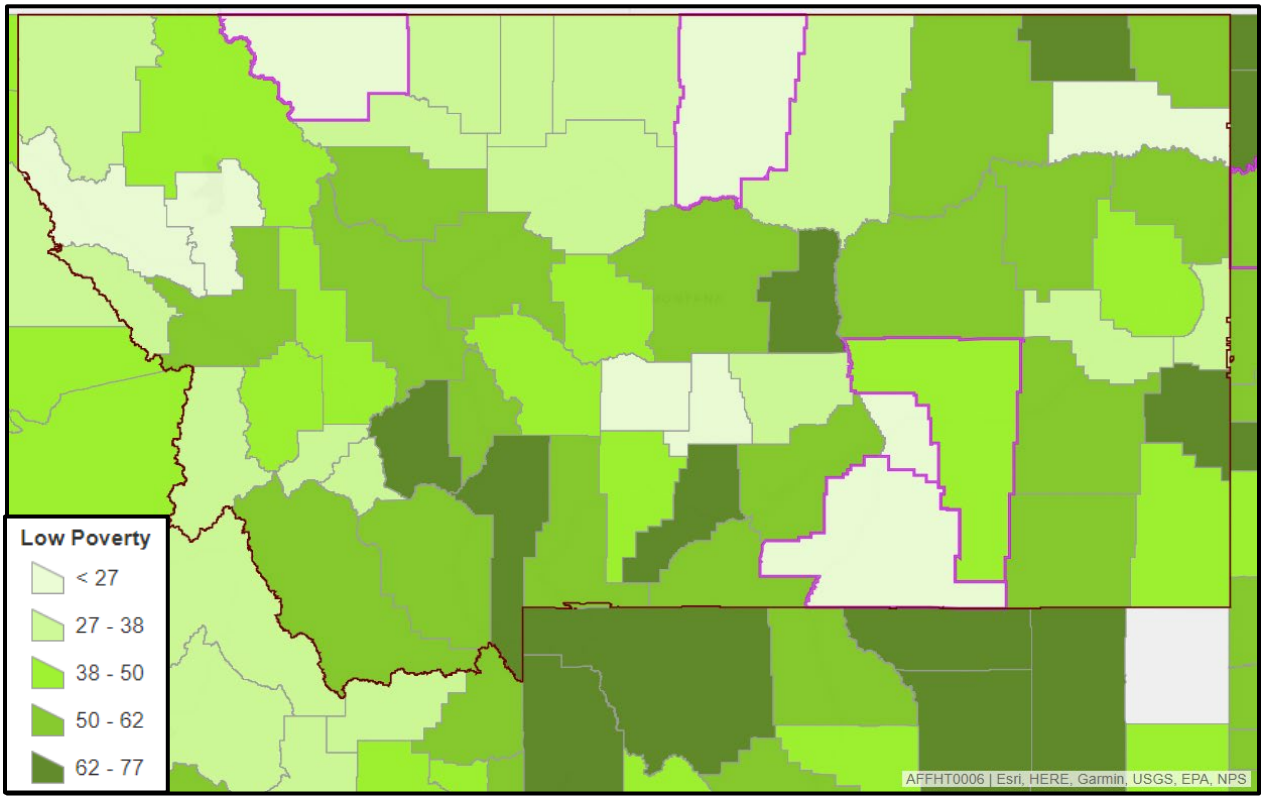
Data Source: HUD AFFH Tool

[5] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf

Geographic Access

Map IV.1 shows levels of access to low poverty areas across Montana. The highest index levels, or those with more access to low poverty areas, are found across the state, primarily in areas adjacent to larger cities and outside American Indian reservations. The geographic distribution of low poverty areas by race and ethnicity follows this trend as well.

Map IV.1: Low Poverty Index



Data Source: HUD AFFH Tool

Darker color = lower poverty

The highest rates of access to low poverty areas are adjacent to larger cities, such as Butte and Billings, as seen in the darkest-shaded areas of **Map IV.1**. In contrast, the lighter-shaded portions of **Map IV.1** represent the areas with the highest exposure to poverty — generally more rural locations within the state.

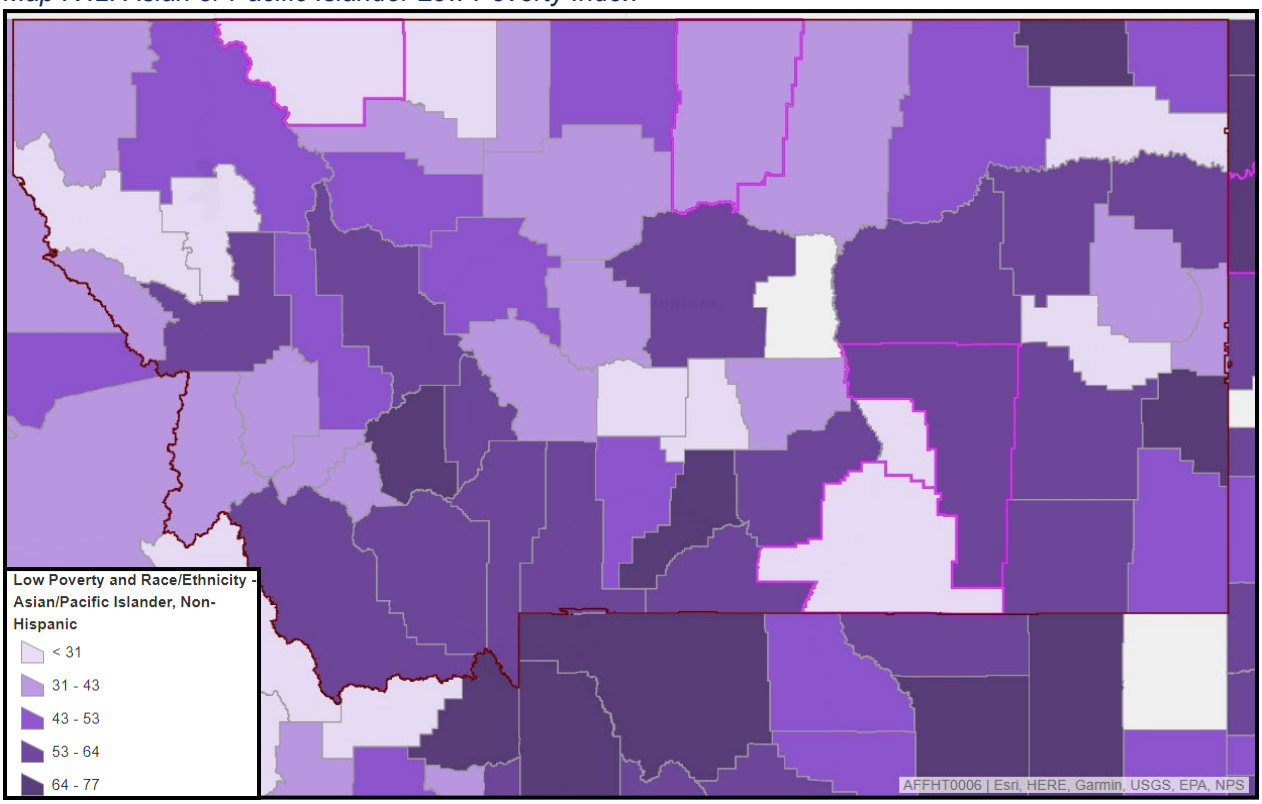
As shown in **Map IV.2**, Asian or Pacific Islander populations see access to low poverty areas in a similar geographic pattern as the overall Montana population.

Per **Map IV.3**, American Indian populations see the lowest levels of access to low poverty areas, or conversely the highest exposure to poverty, in American Indian reservation areas. Outside of reservation areas, American Indian households have similar levels of Low Poverty index ratings as other racial and ethnic groups.

White, non-Hispanic populations trend in a similar pattern with geographic access to low poverty areas, as seen in **Map IV.4**.

Hispanic populations also mirror the geographic distribution of access to low poverty areas, as seen in **Map IV.5**. Hispanic populations have comparable index ratings for low poverty access to White, Black, and Asian or Pacific Islander populations in Montana.

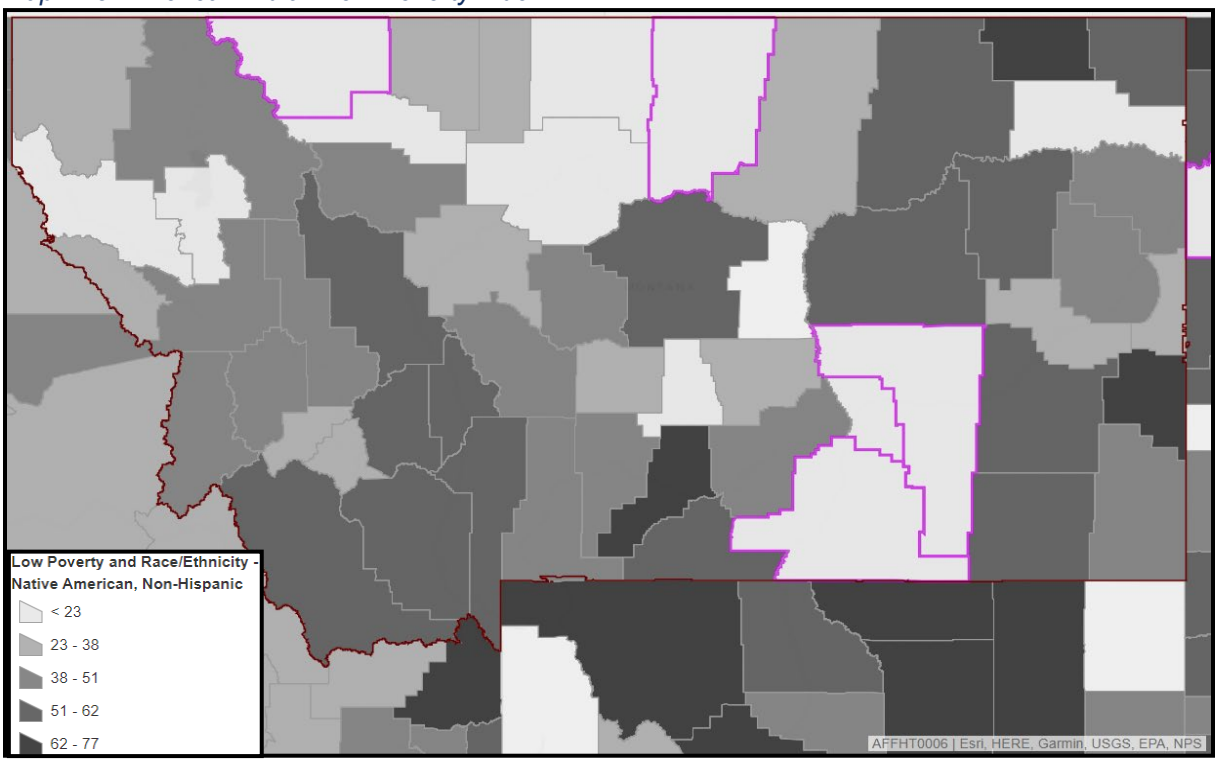
Map IV.2: Asian or Pacific Islander Low Poverty Index



Data Source: HUD AFFH Tool

Darker color = lower poverty

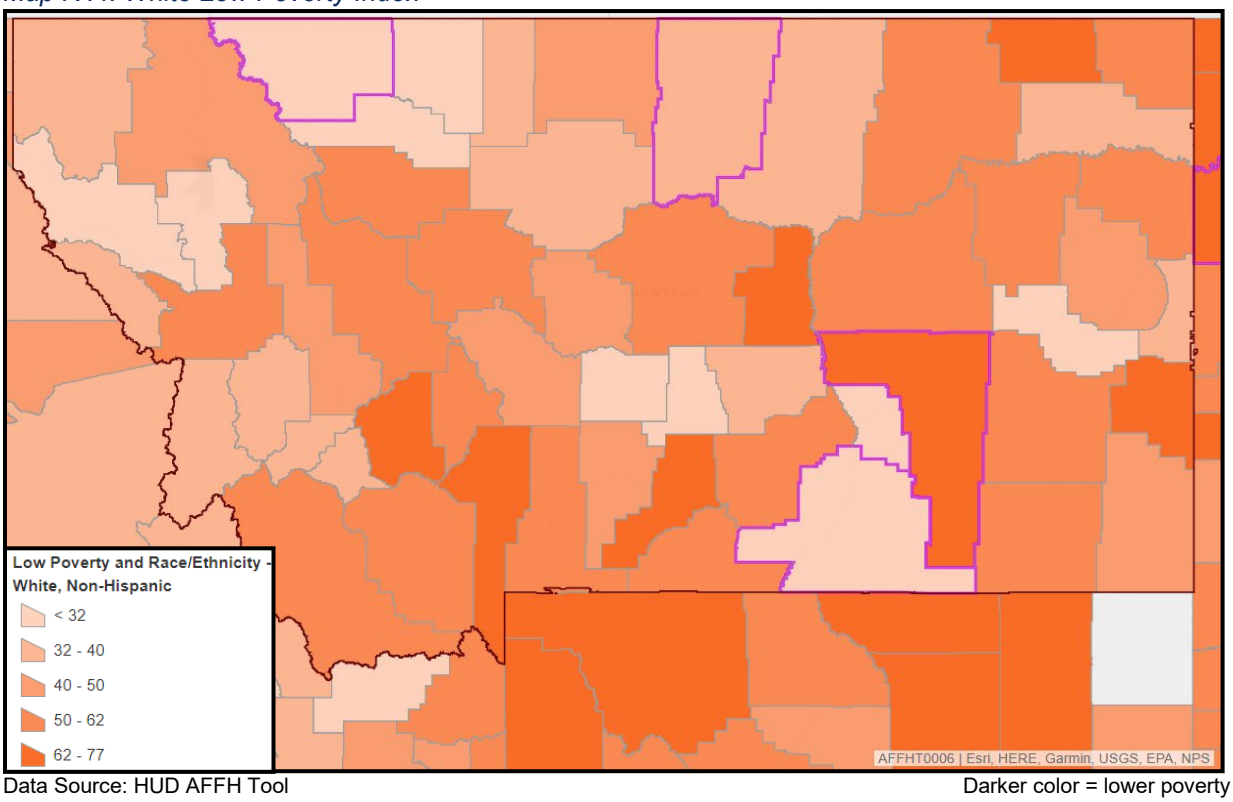
Map IV.3: American Indian Low Poverty Index



Data Source: HUD AFFH Tool

Darker color = lower poverty

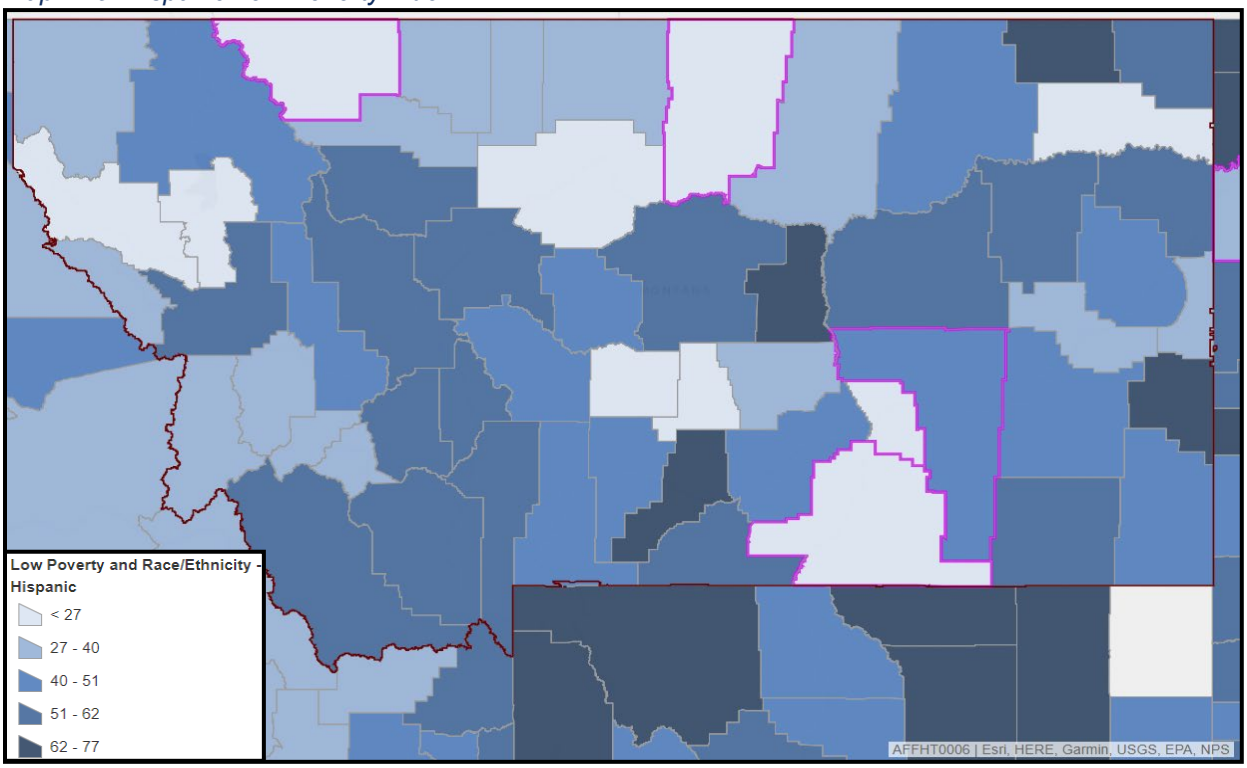
Map IV.4: White Low Poverty Index



Data Source: HUD AFFH Tool

Darker color = lower poverty

Map IV.5: Hispanic Low Poverty Index



Data Source: HUD AFFH Tool

Darker color = lower poverty

School proficiency

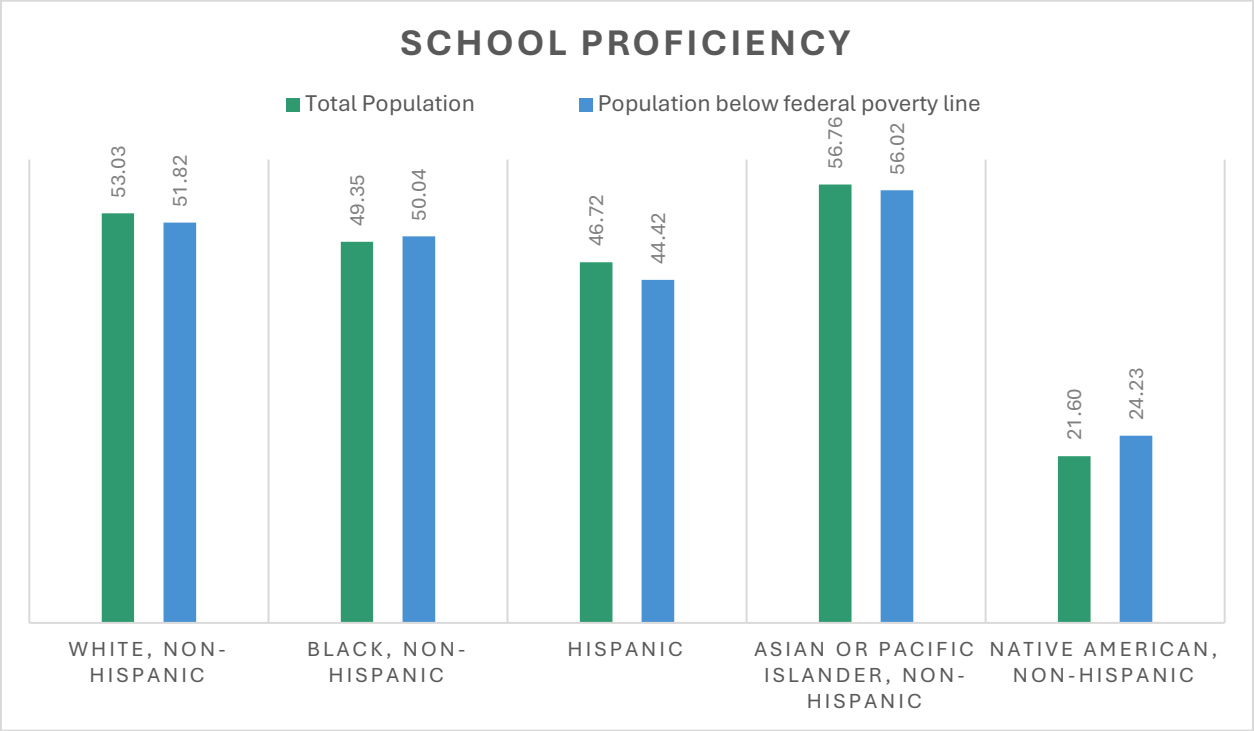
The School Proficiency Index uses school-level data on the performance of 4th-grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower-performing elementary schools. The School Proficiency Index is based on the percentage of 4th-grade students proficient in reading and math on state test scores for up to three schools within 3 miles of geographic neighborhoods.[6]

The values for Montana are shown in **Diagram IV.2**. American Indian, non-Hispanic households have the lowest level of access to proficient schools based on HUD's definition. This is followed by Hispanic households, then Black, Non-Hispanic households. White, non-Hispanic, and Asian or Pacific Islander, non-Hispanic households have the highest level of access to proficient schools. While there is some variation between the population as a whole and the population under the federal poverty line, the level of

[6] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf

access to proficient schools is relatively equal for households living in poverty to those not living in poverty.

Diagram IV.2: School Proficiency Index



Data Source: HUD AFFH Tool

Geographic Access

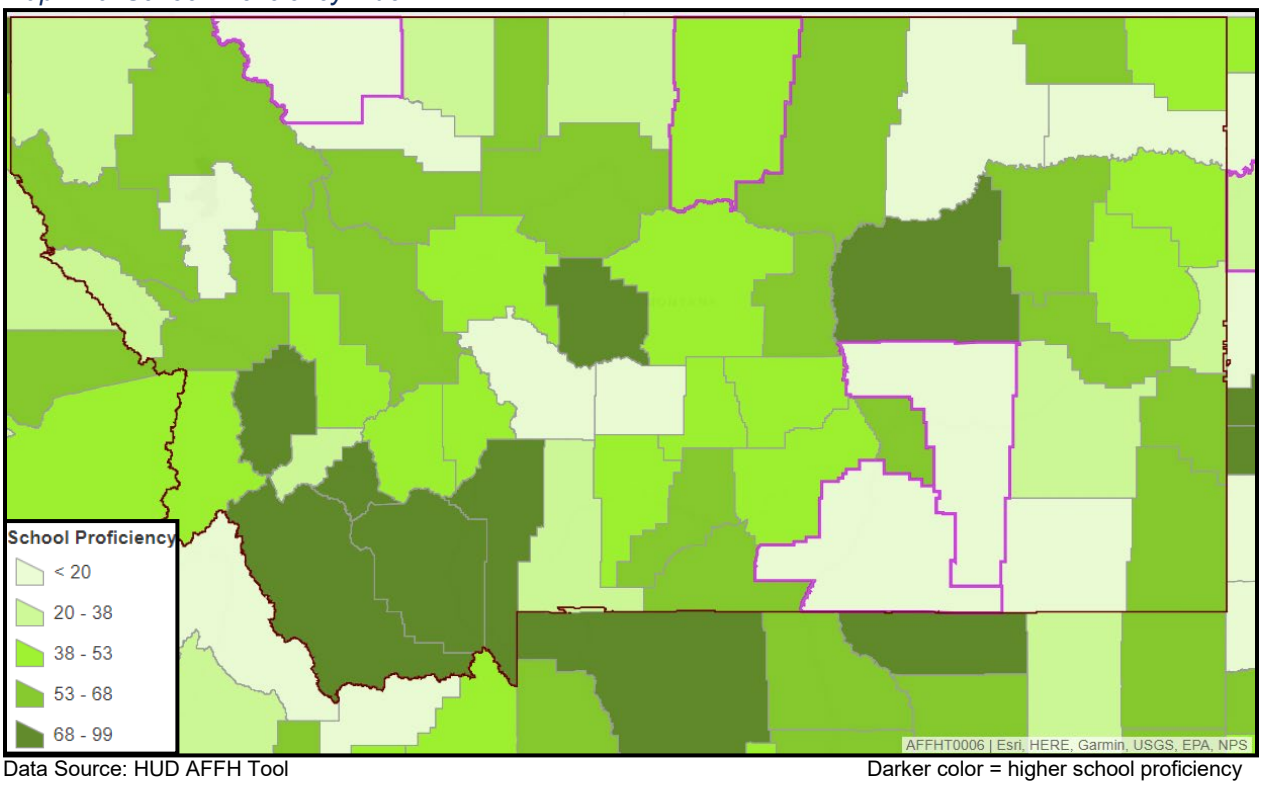
According to **Maps IV.6** through **IV.11**, the largest concentration of low school proficiency scores occurs in the more rural areas of the state, including several R/ECAPs, as noted by the lighter-shaded areas of each map below.

Asian or Pacific Islander populations see the greatest access to proficient schools in more densely populated areas. However, contrary to the School Proficiency Index rating in Montana overall, the lowest levels of access are not primarily in R/ECAPs, and are spread out across the state, as seen in **Map IV.7**.

Similar to the overall School Proficiency Index ratings, Black populations see a wide range of access to proficient schools with higher ratings in more densely populated areas (**Map IV.8**). American Indian populations see the lowest ratings in areas in and adjacent to American Indian reservations (**Map IV.9**).

Since the majority of the population in Montana is White, the School Proficiency Index rating for the White population unsurprisingly mirrors the statewide index ratings (**Map IV.10**). Hispanic populations, however, see the lowest ratings closely corresponding to R/ECAPs, as seen in **Map IV.11**.

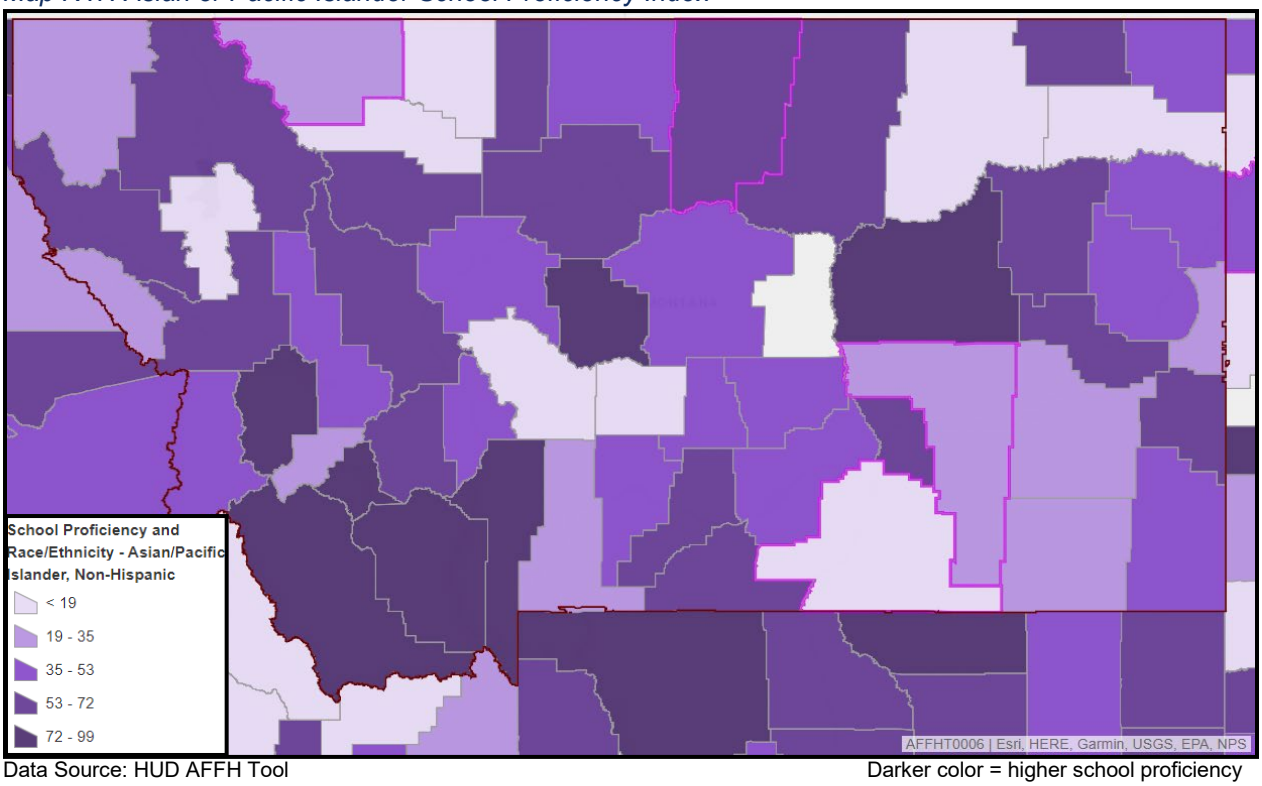
Map IV.6: School Proficiency Index



Data Source: HUD AFFH Tool

Darker color = higher school proficiency

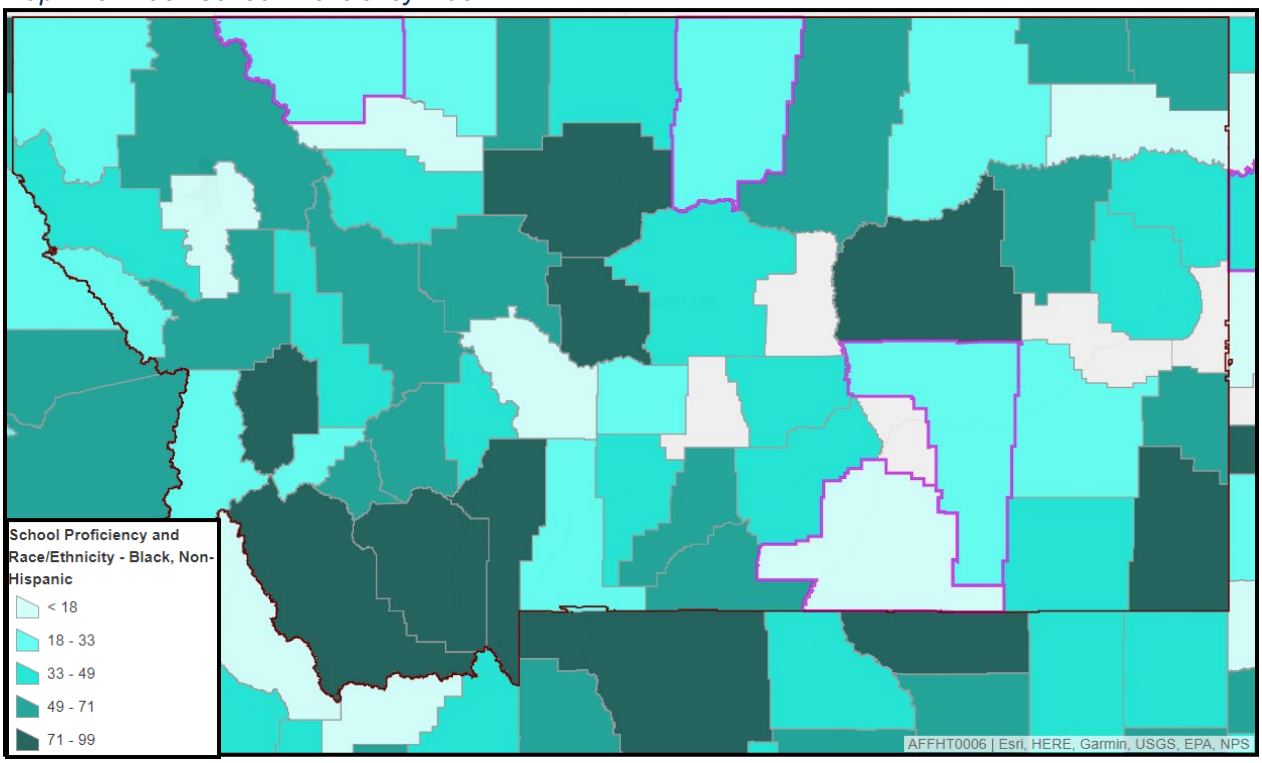
Map IV.7: Asian or Pacific Islander School Proficiency Index



Data Source: HUD AFFH Tool

Darker color = higher school proficiency

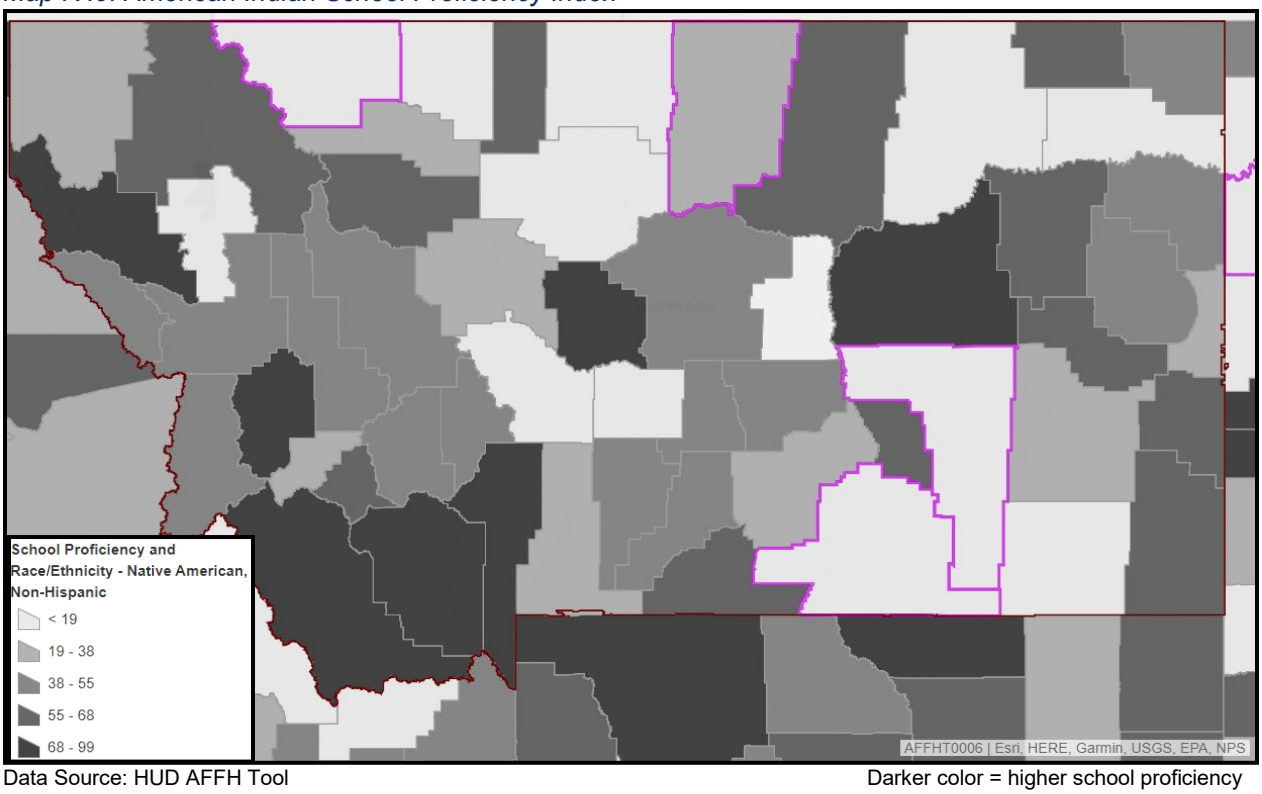
Map IV.8: Black School Proficiency Index



Data Source: HUD AFFH Tool

Darker color = higher school proficiency

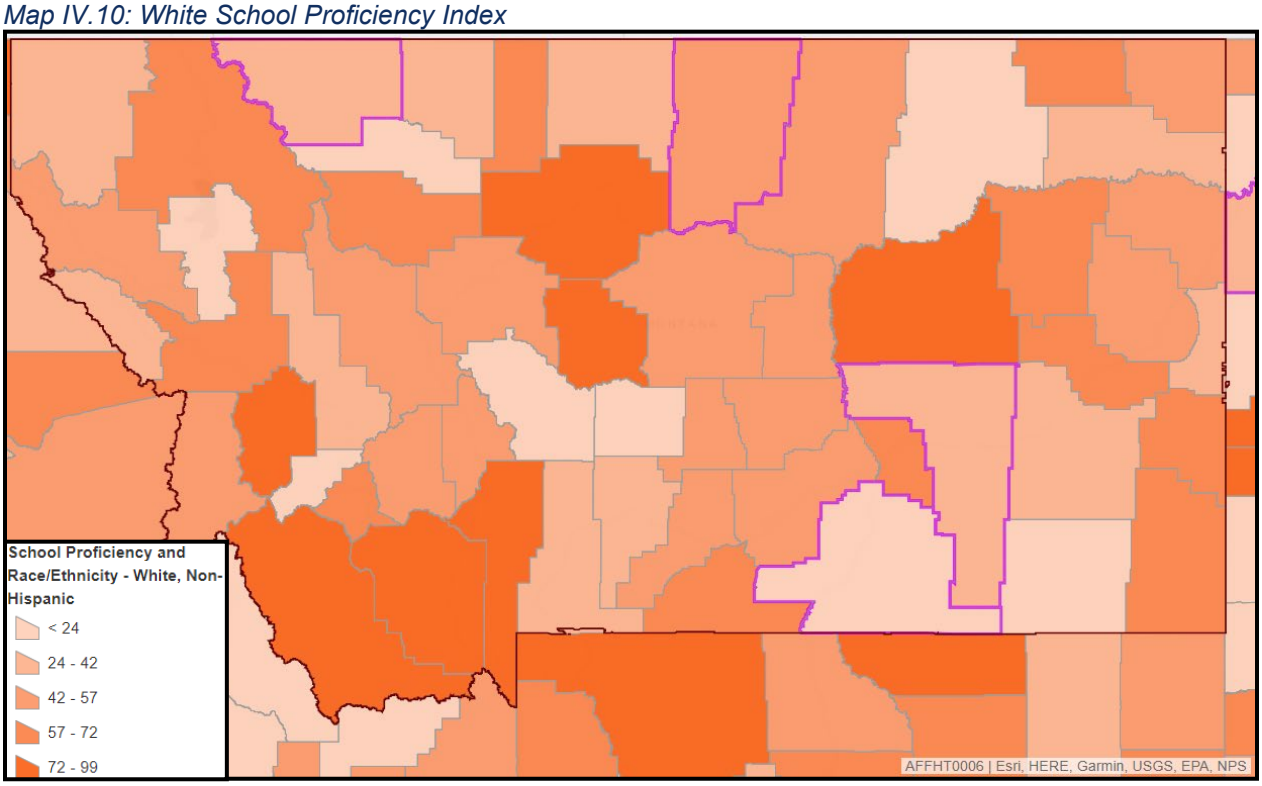
Map IV.9: American Indian School Proficiency Index



Data Source: HUD AFFH Tool

Darker color = higher school proficiency

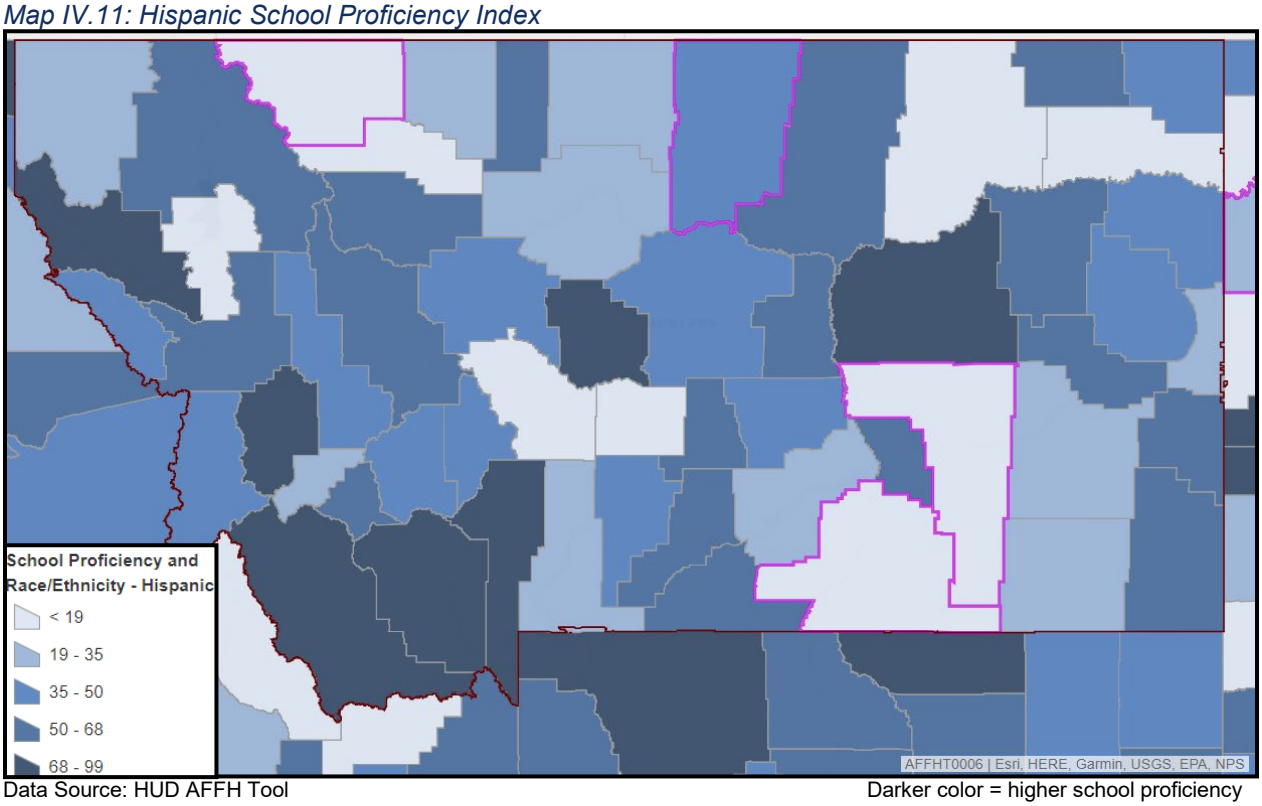
Map IV.10: White School Proficiency Index



Data Source: HUD AFFH Tool

Darker color = higher school proficiency

Map IV.11: Hispanic School Proficiency Index



Data Source: HUD AFFH Tool

Darker color = higher school proficiency

Job Proximity

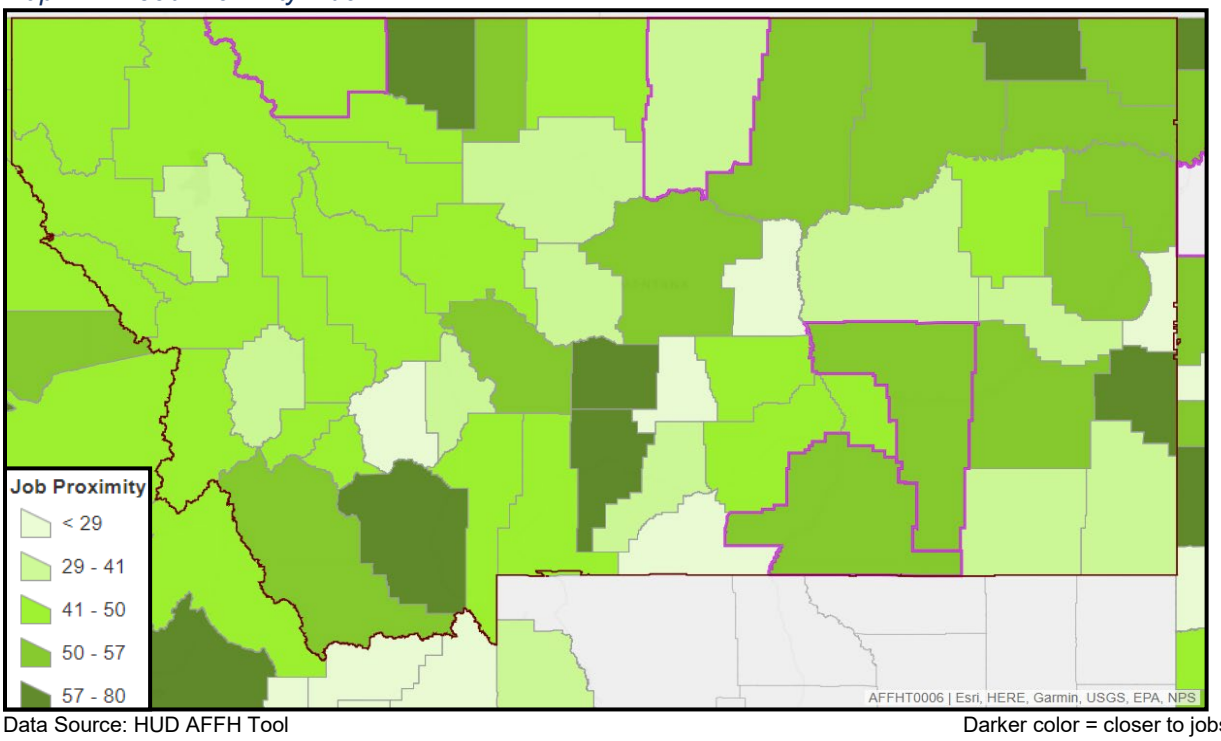
The Jobs Proximity Index measures the physical distances between the place of residence and jobs. It calculates the physical closeness of neighborhoods to employment centers and measures the accessibility of employment to the geographic location of neighborhoods.[7] The HUD AFFH Tool does not provide the Job Proximity Index ratings in tabular form. However, it is available in mapped form, as discussed below.

Geographic Access

Job proximity varies across the state. As expected, areas with closer access to city centers have higher ratings of job proximity, according to the HUD-defined calculations, as seen in **Map IV.12**. This is also true for areas with larger tourist attractions and educational institutions.

Racial and ethnic distribution of Job Proximity Index ratings does not vary much from the overall ratings in Montana, as seen in **Maps IV.13** through **IV.17** on the following pages.

Map IV.12: Job Proximity Index

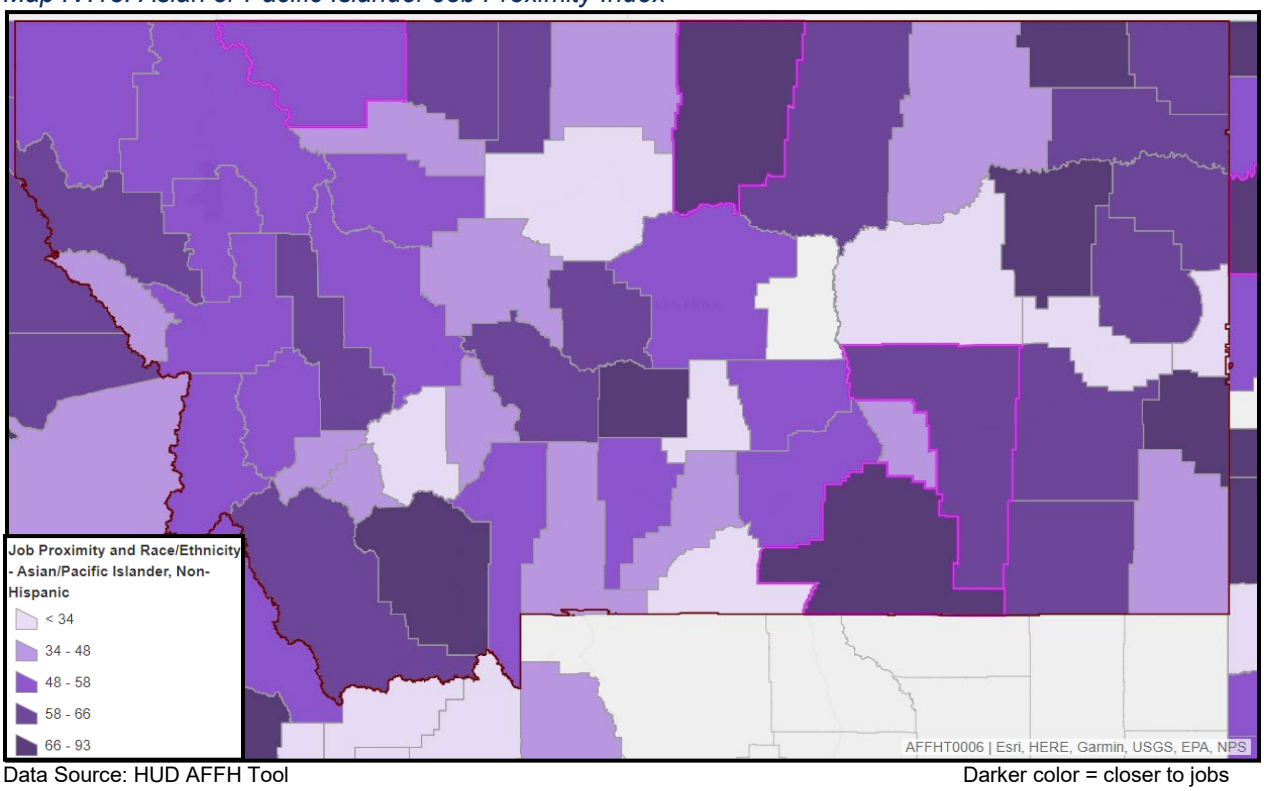


Data Source: HUD AFFH Tool

Darker color = closer to jobs

[7] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf

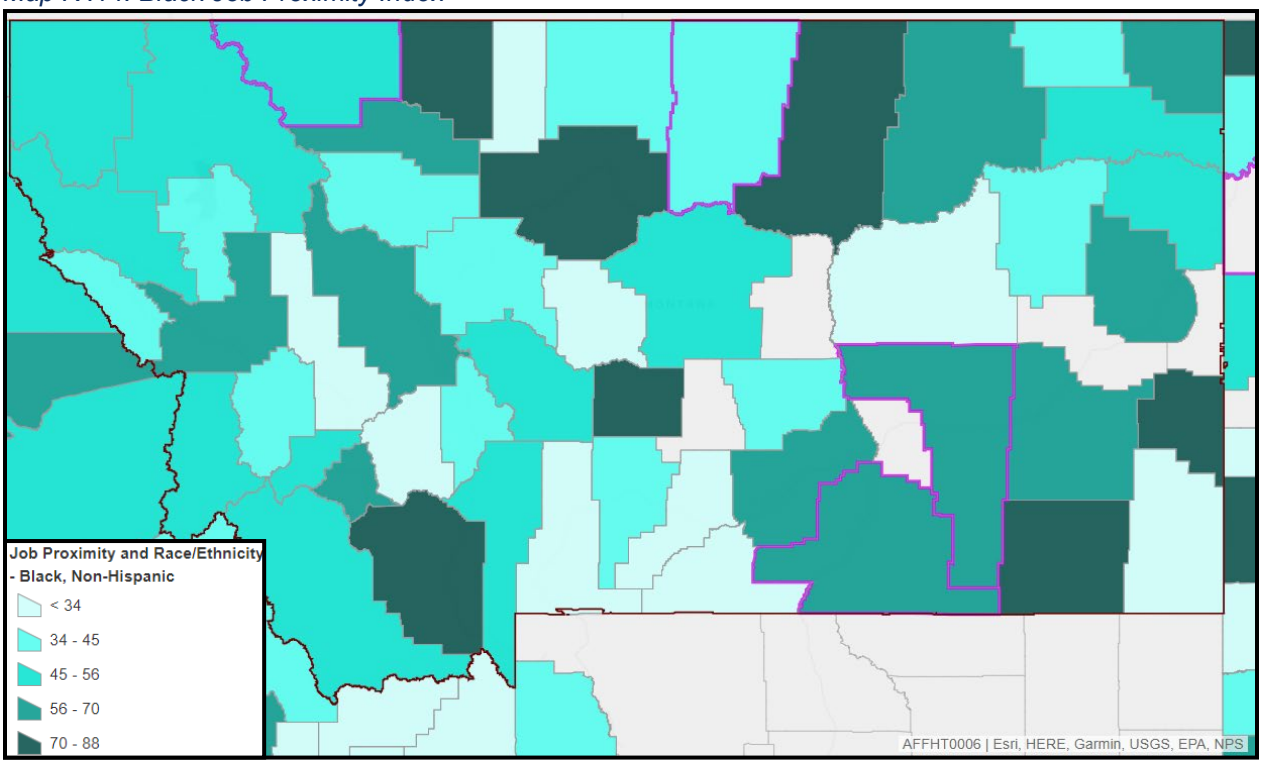
Map IV.13: Asian or Pacific Islander Job Proximity Index



Data Source: HUD AFFH Tool

Darker color = closer to jobs

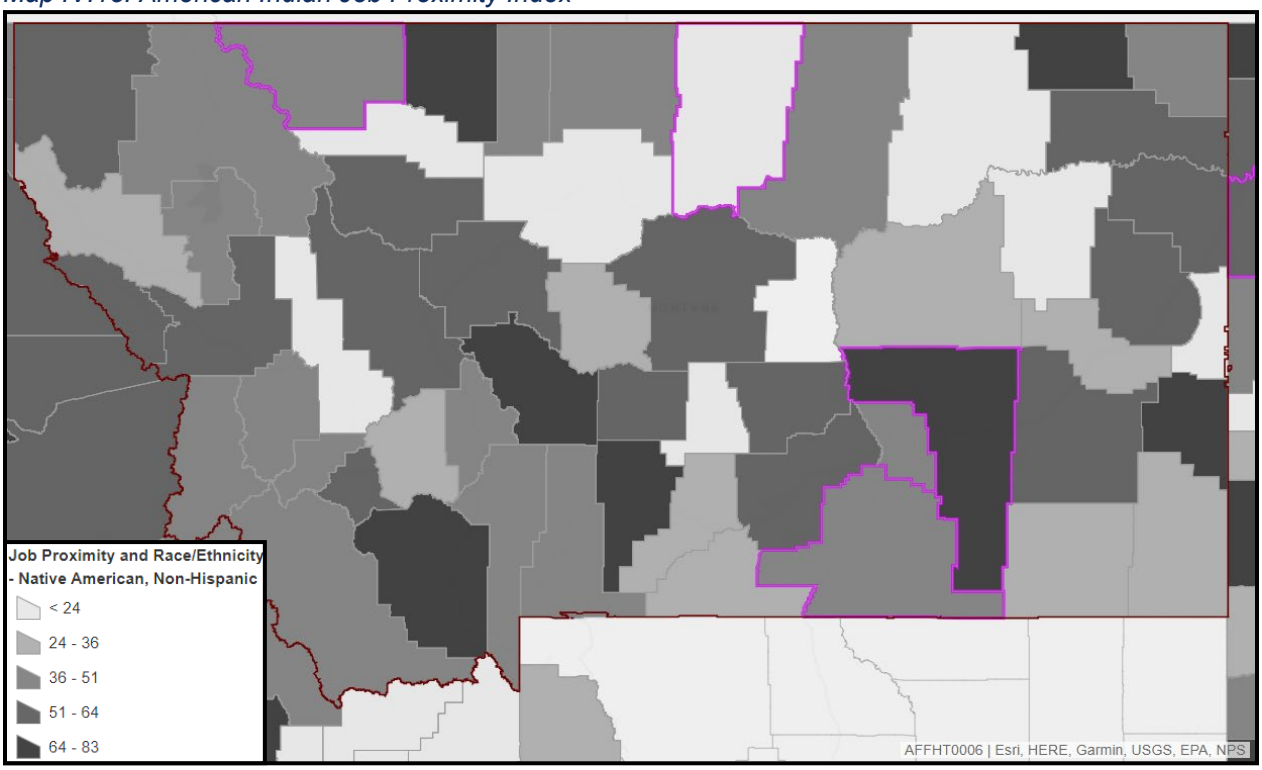
Map IV.14: Black Job Proximity Index



Data Source: HUD AFFH Tool

Darker color = closer to jobs

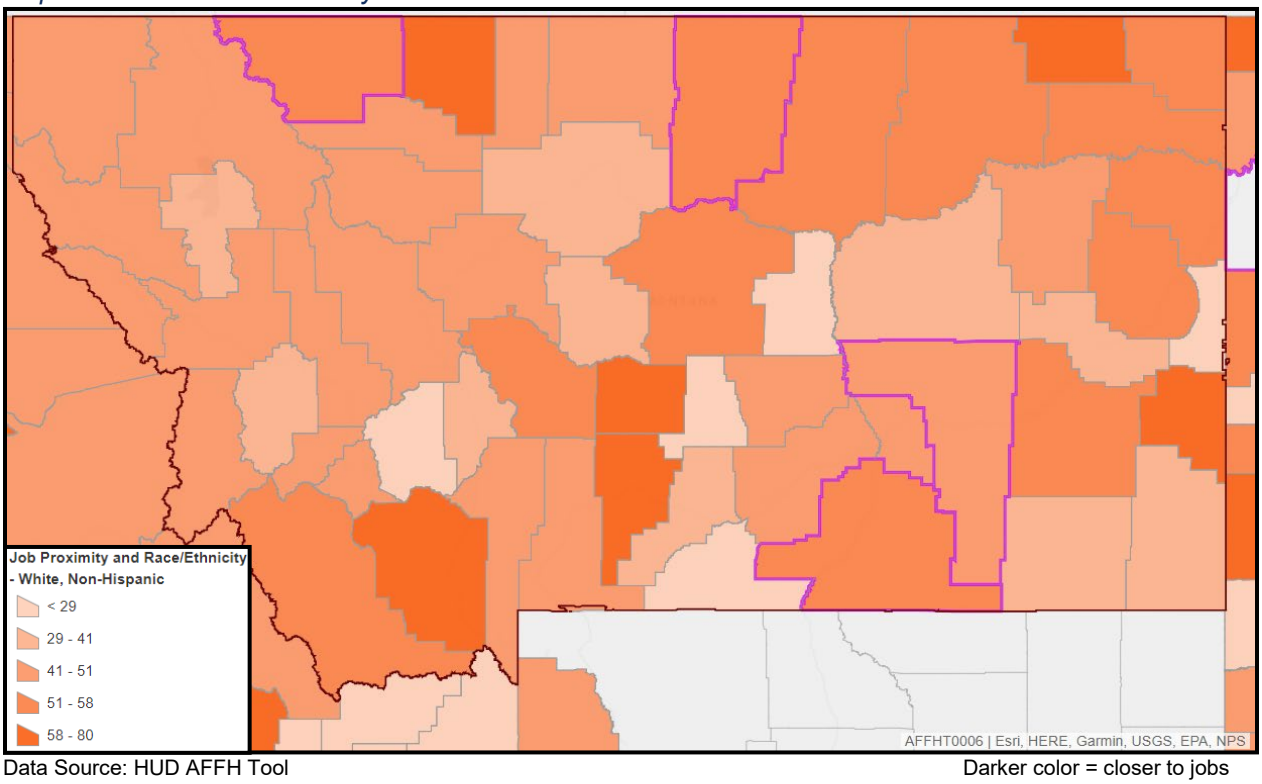
Map IV.15: American Indian Job Proximity Index



Data Source: HUD AFFH Tool

Darker color = closer to jobs

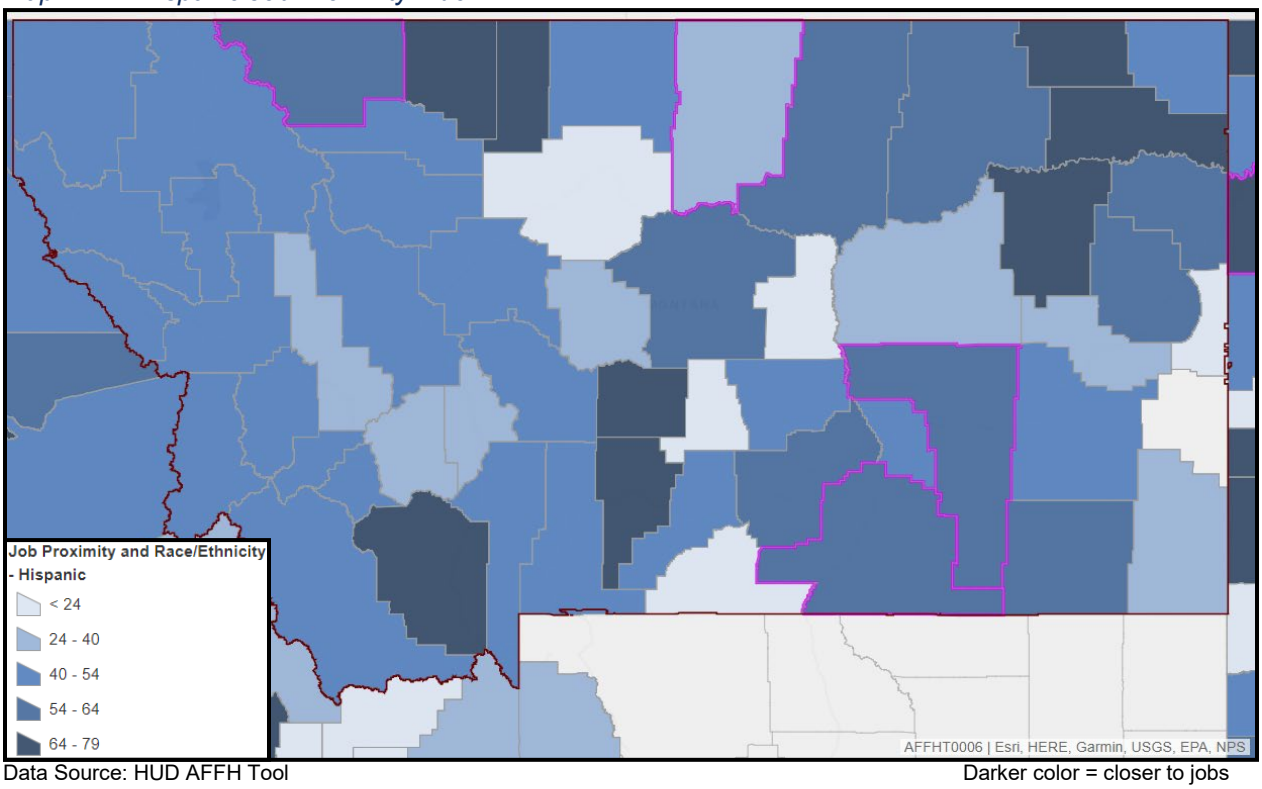
Map IV.16: White Job Proximity Index



Data Source: HUD AFFH Tool

Darker color = closer to jobs

Map IV.17: Hispanic Job Proximity Index



Data Source: HUD AFFH Tool

Darker color = closer to jobs

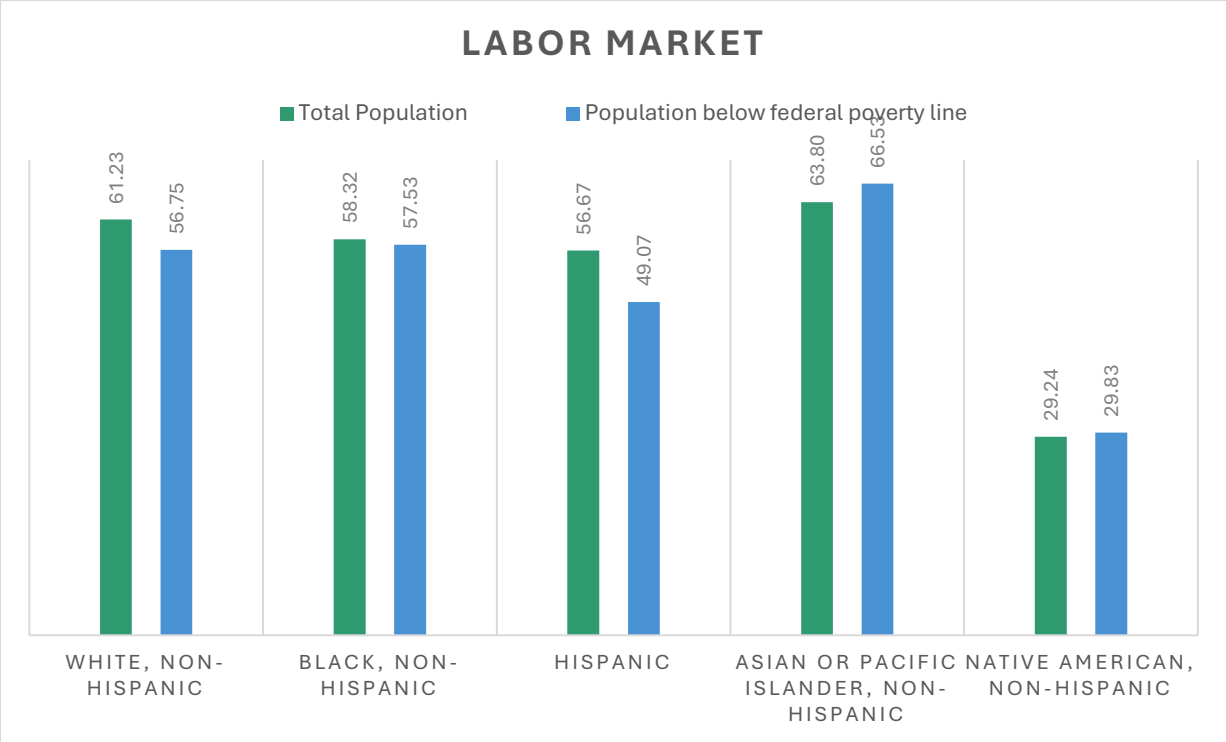
Labor Market Engagement

The Labor Market Engagement Index provides a quantification of the relative intensity of labor market engagement and human capital in a neighborhood, based upon the level of employment, labor force participation, and educational attainment in a census tract.[8]

American Indian, Non-Hispanic households have the lowest rates of access to the labor market with index ratings below 30, while Asian or Pacific Islander, Non-Hispanic households have the highest rates at over 63. White, Black, and Hispanic households all have similar ratings for access to the job market, ranging between 49.07 and 61.23. This is shown in **Diagram IV.3**.

[8] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf

Diagram IV.3: Labor Market Engagement Index

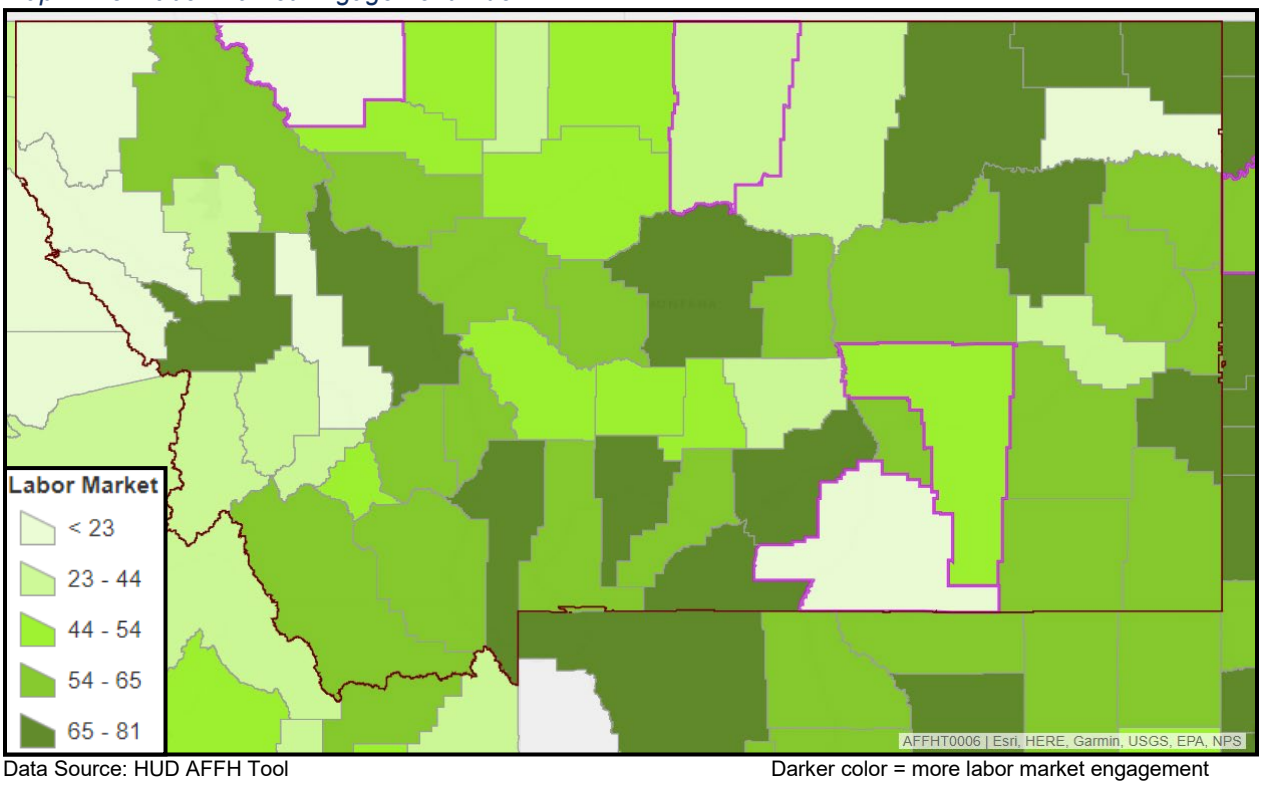


Data Source: HUD AFFH Tool

Geographic Access

As seen by the Jobs Proximity Index data above, racial and ethnic groups experienced a relatively similar set of index values, with the exception of American Indians. However, the level of labor market engagement varied across the state. The highest level of labor market engagement was seen outside of R/ECAPs and in areas near larger cities. Similar trends were seen across racial and ethnic groups. See **Maps IV.18** through **IV.23**.

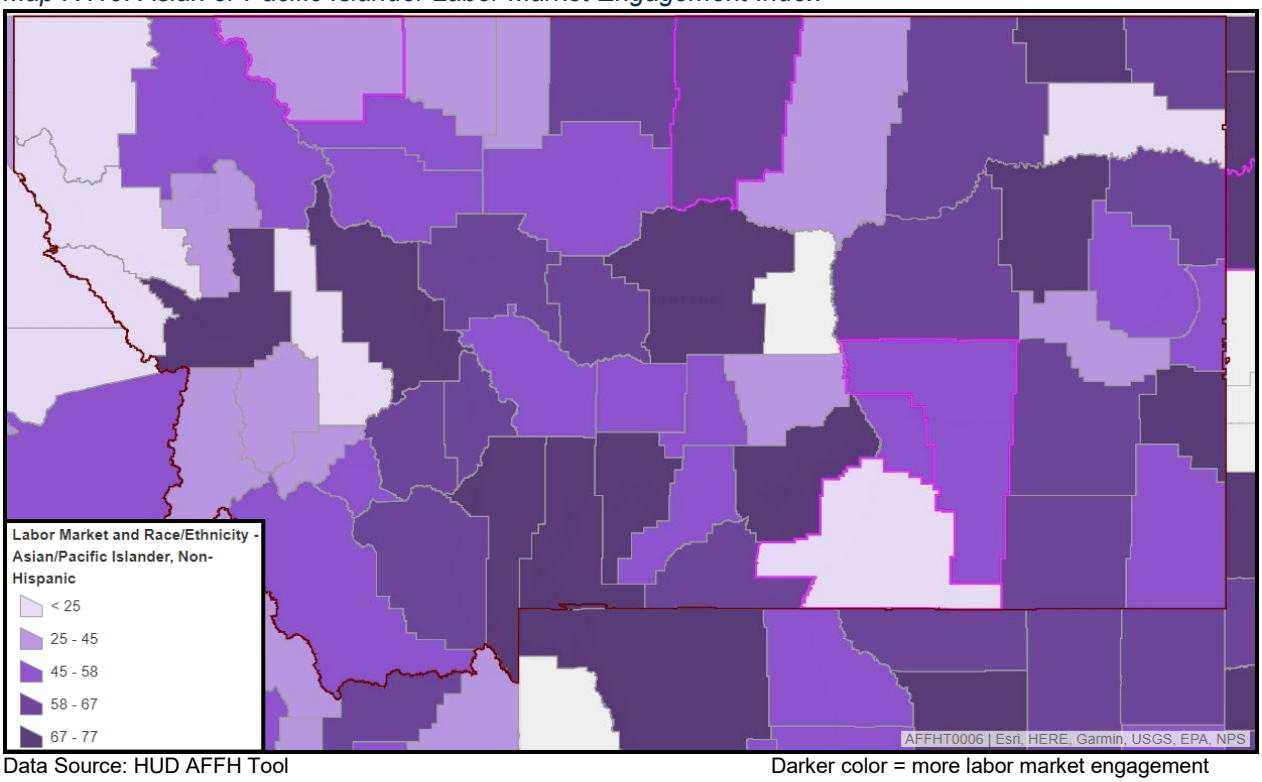
Map IV.18: Labor Market Engagement Index



Data Source: HUD AFFH Tool

Darker color = more labor market engagement

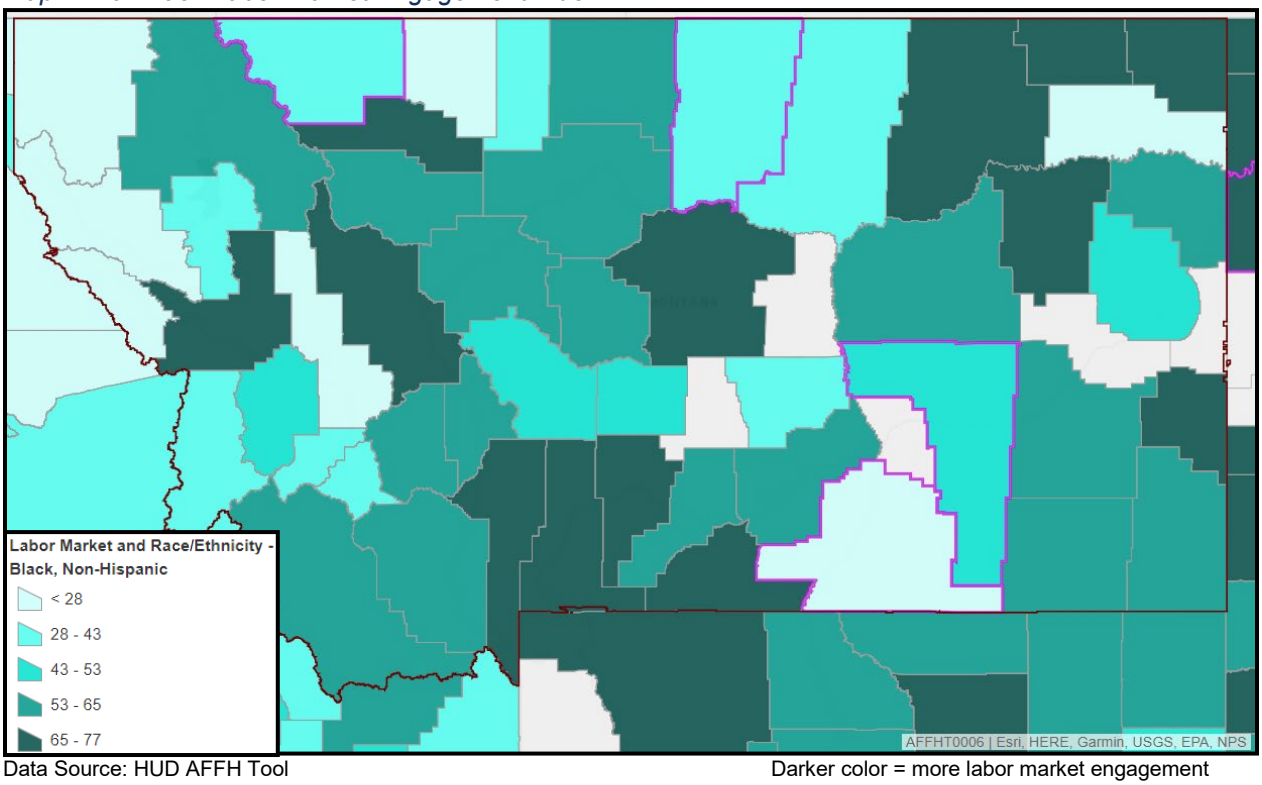
Map IV.19: Asian or Pacific Islander Labor Market Engagement Index



Data Source: HUD AFFH Tool

Darker color = more labor market engagement

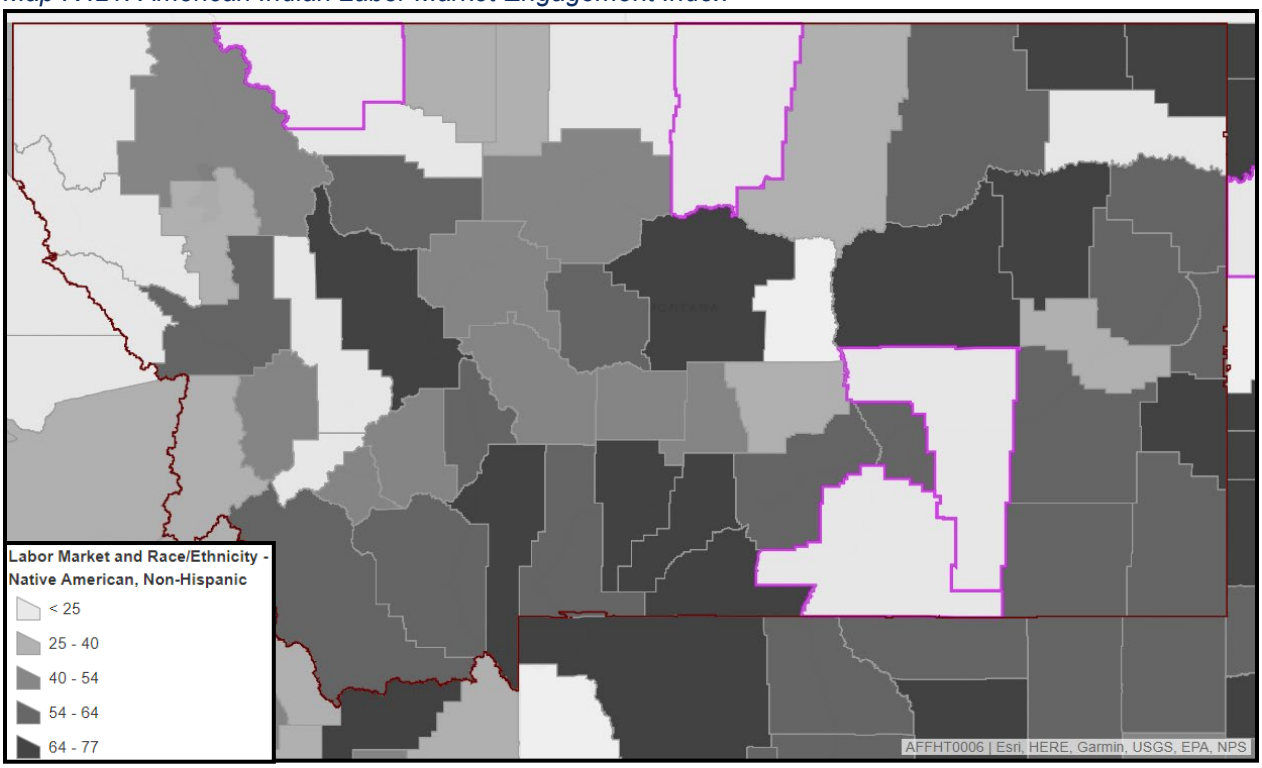
Map IV.20: Black Labor Market Engagement Index



Data Source: HUD AFFH Tool

Darker color = more labor market engagement

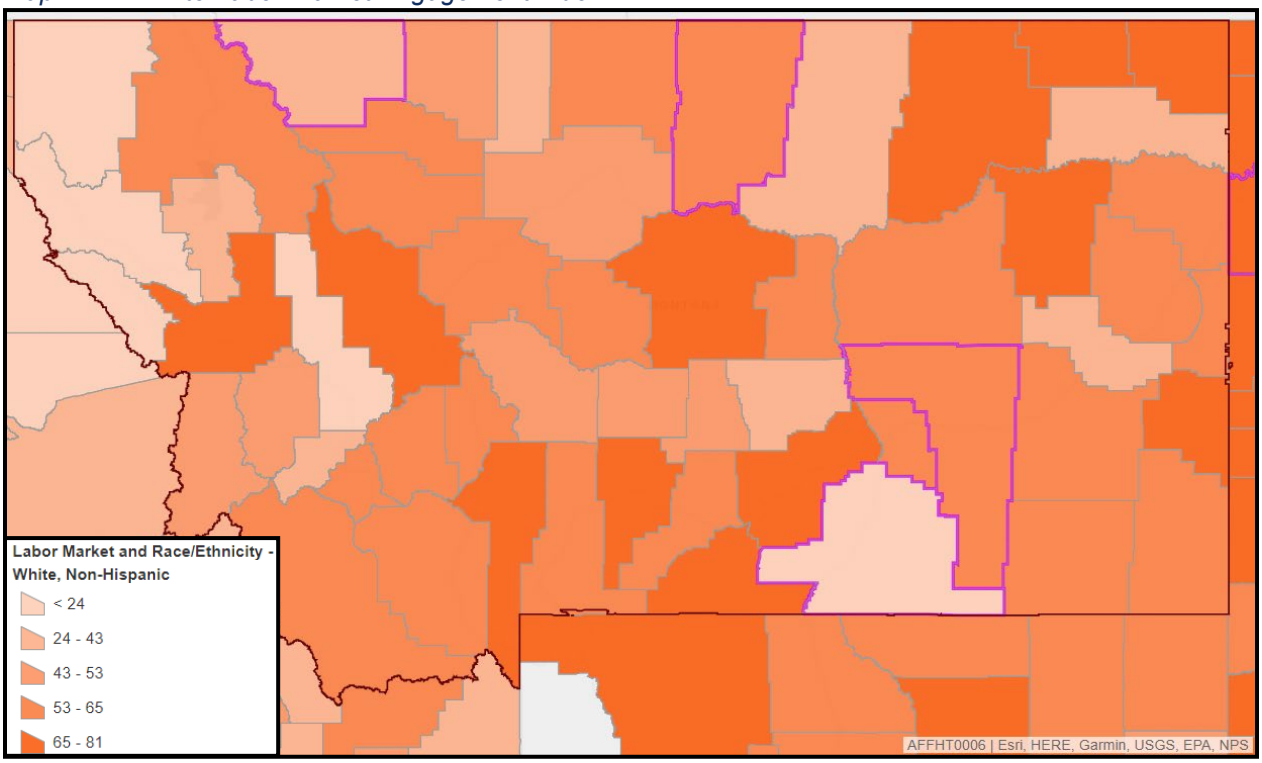
Map IV.21: American Indian Labor Market Engagement Index



Data Source: HUD AFFH Tool

Darker color = more labor market engagement

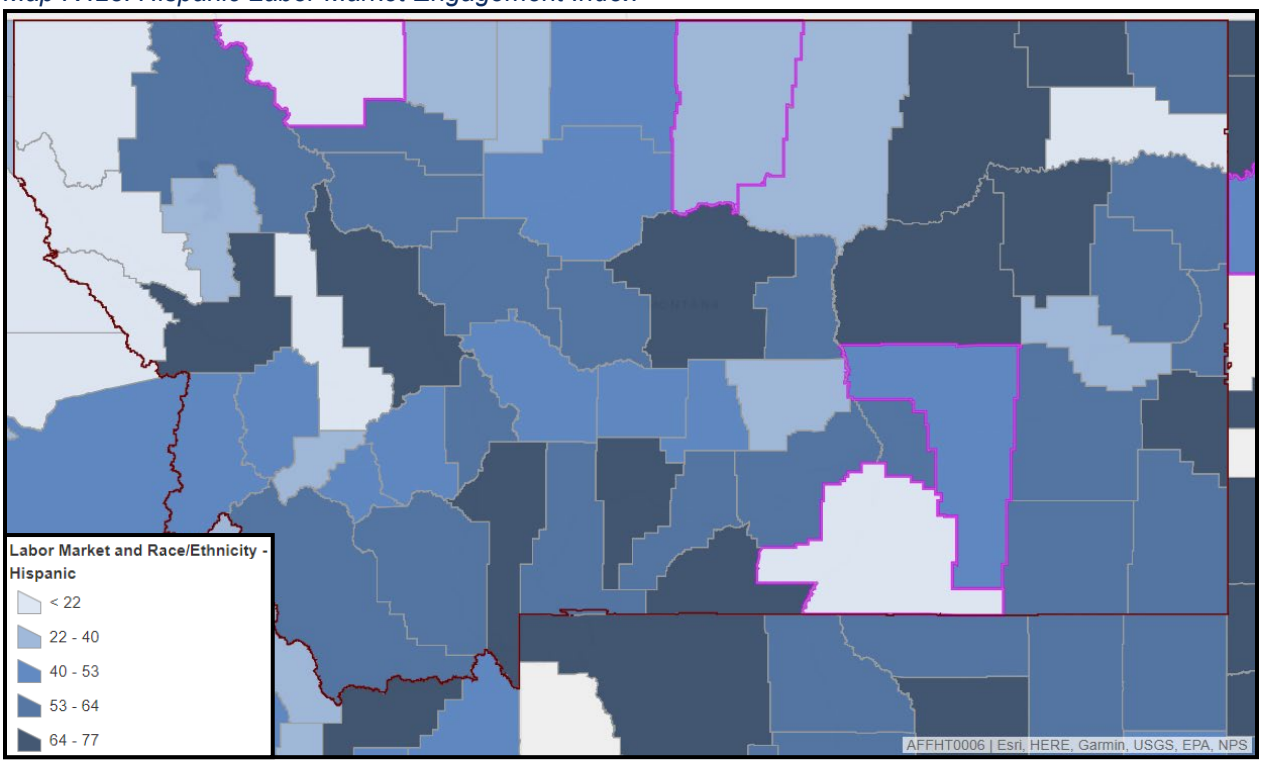
Map IV.22: White Labor Market Engagement Index



Data Source: HUD AFFH Tool

Darker color = more labor market engagement

Map IV.23: Hispanic Labor Market Engagement Index



Data Source: HUD AFFH Tool

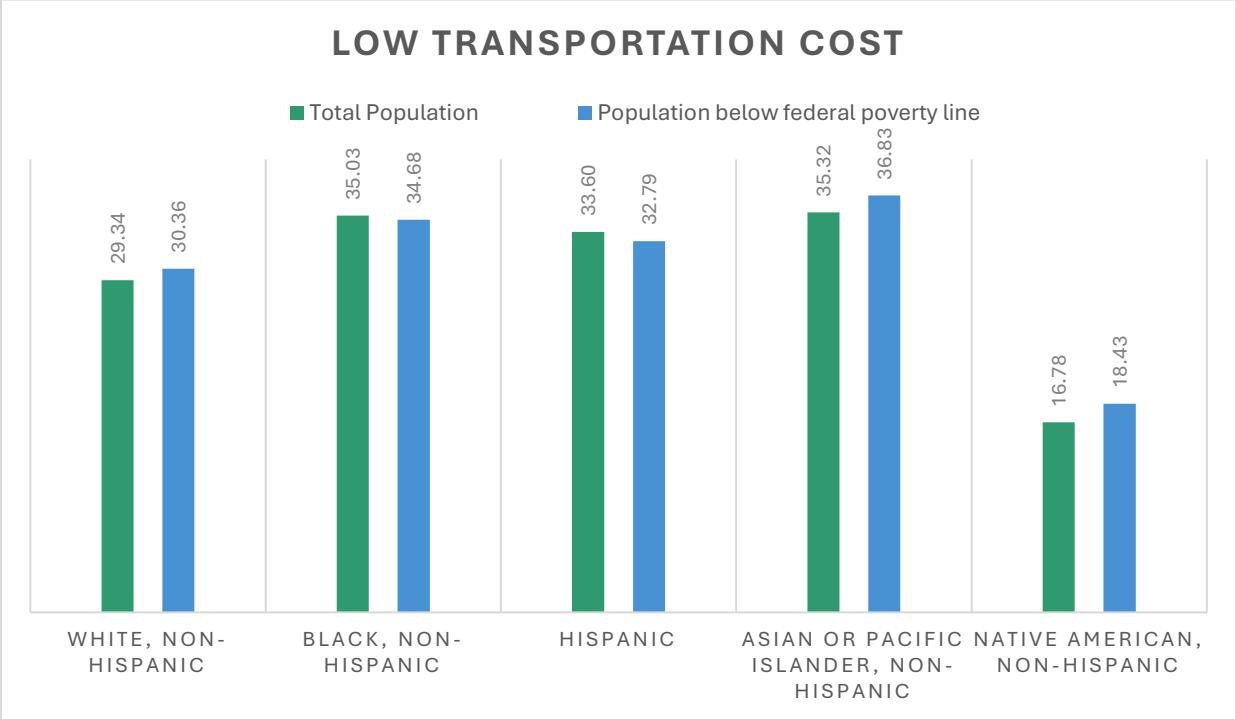
Darker color = more labor market engagement

Low Transportation Cost

The Low Transportation Cost Index measures the cost of transport as well as the proximity to public transportation by neighborhood. The index estimates transportation costs for a family that meets the following description: a 3-person single-parent family with 50% of the median income for renters for the region. The higher the index value, the lower the cost of transportation in that neighborhood.[9]

The values for Montana are shown in **Diagram IV.4**. Low Transportation Index ratings were highest for Asian or Pacific Islander and Black populations, at index ratings over 35. White populations had ratings at 29.34 overall and 30.36 for White populations living below the federal poverty line. The lowest rating by racial and ethnic group is for American Indians, at 16.76 overall, and 18.43 for poverty-level populations. The lower overall index ratings are presumably due to lower levels of public transportation statewide than other areas in the nation.

Diagram IV.4: Low Transportation Cost Index



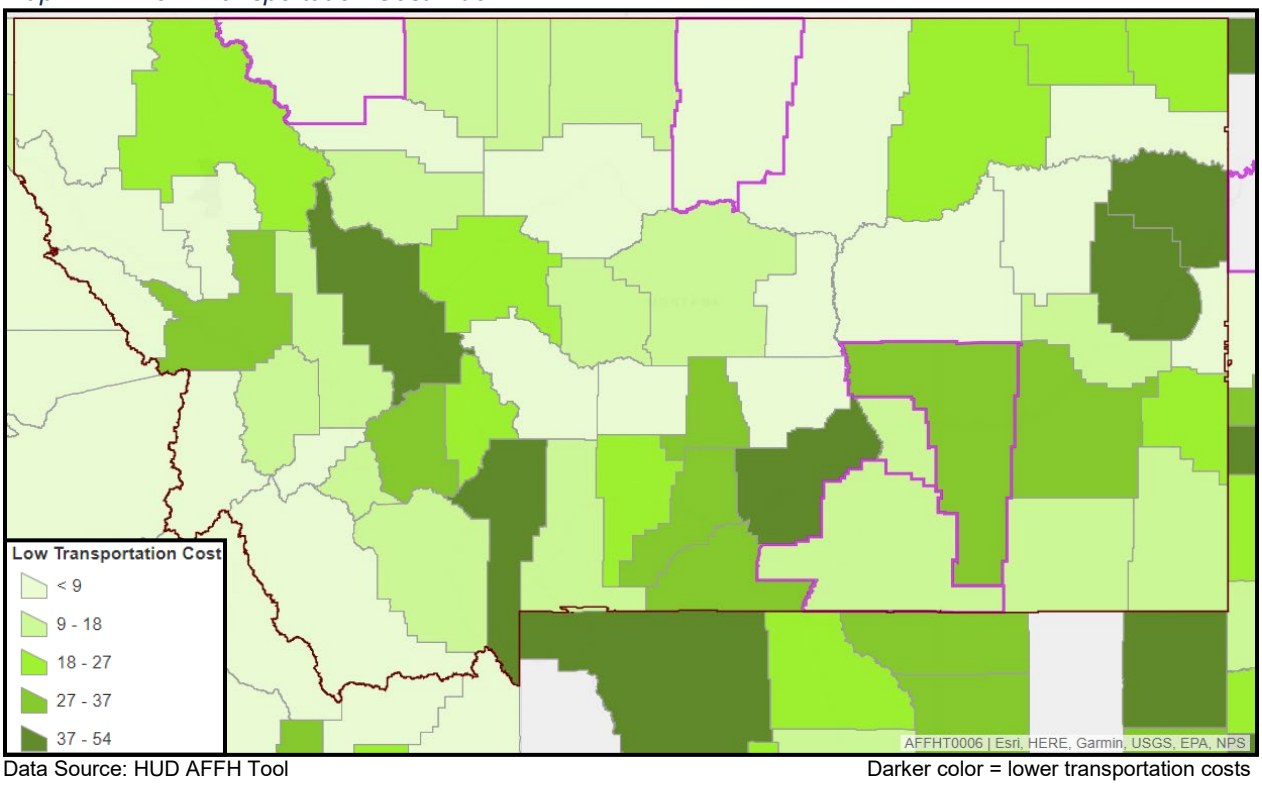
Data Source: HUD AFFH Tool

[9] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf

Geographic Access

Transportation costs are highest, according to HUD calculations, in the more rural areas of Montana. This is attributed to lower levels of access to public transportation due to the large and rural nature of the state with limited access to resources in some areas. The geographic distribution of index ratings for low transportation cost do not vary significantly by race and ethnicity. See **Maps IV.24** to **IV.29** for Low Transportation Cost Index values broadly and across races and ethnicities.

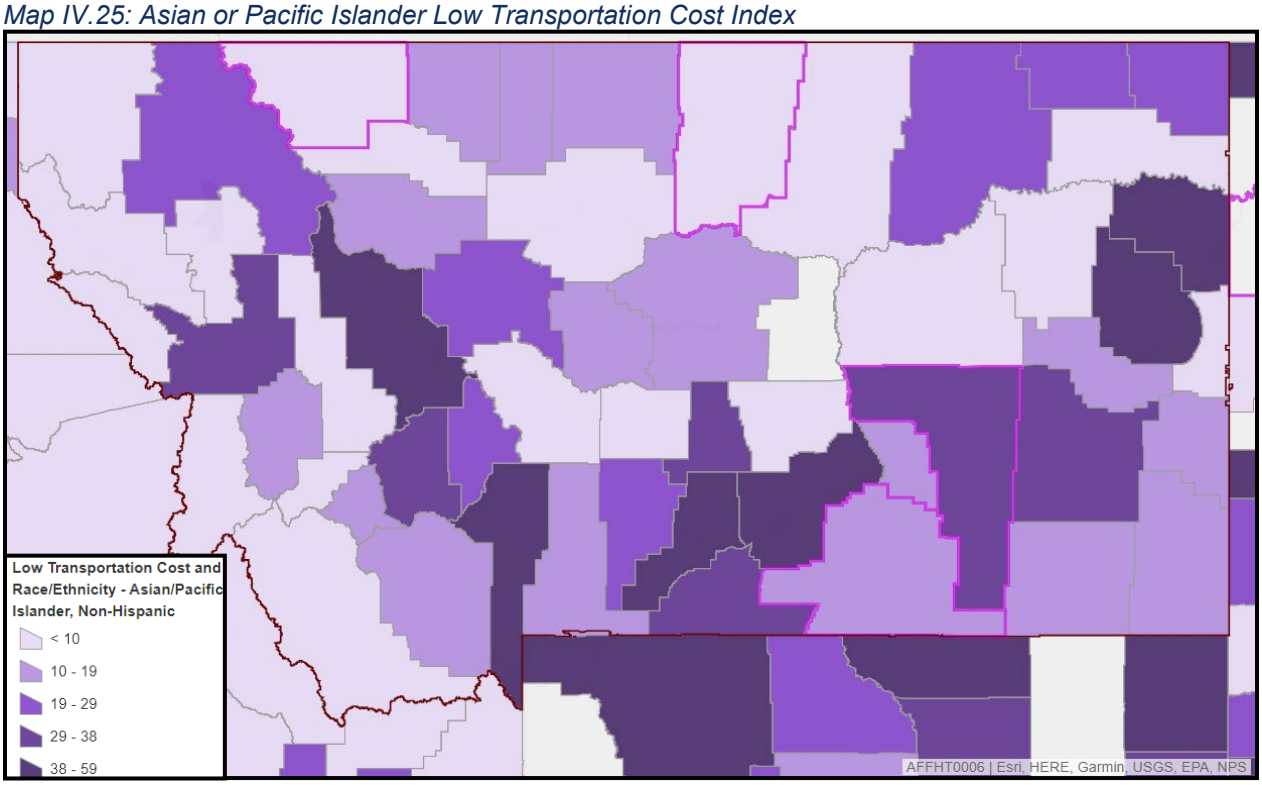
Map IV.24: Low Transportation Cost Index



Data Source: HUD AFFH Tool

Darker color = lower transportation costs

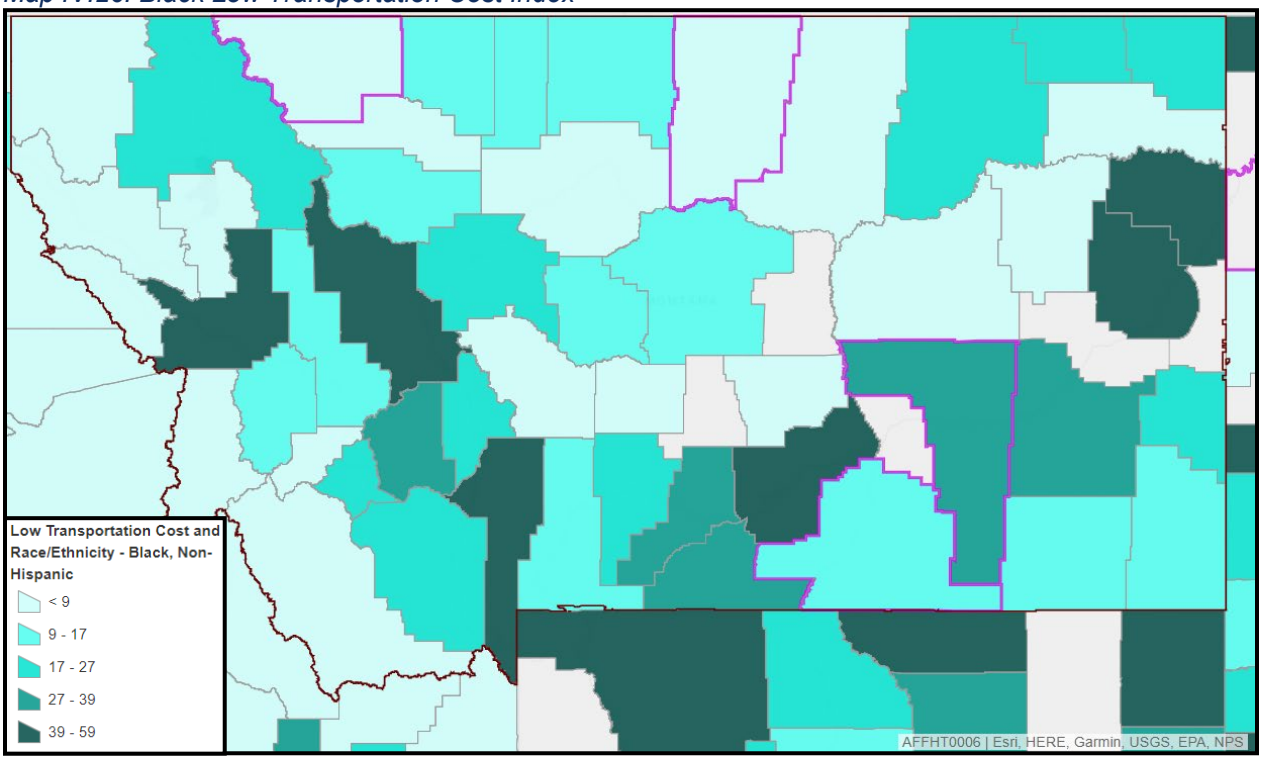
Map IV.25: Asian or Pacific Islander Low Transportation Cost Index



Data Source: HUD AFFH Tool

Darker color = lower transportation costs

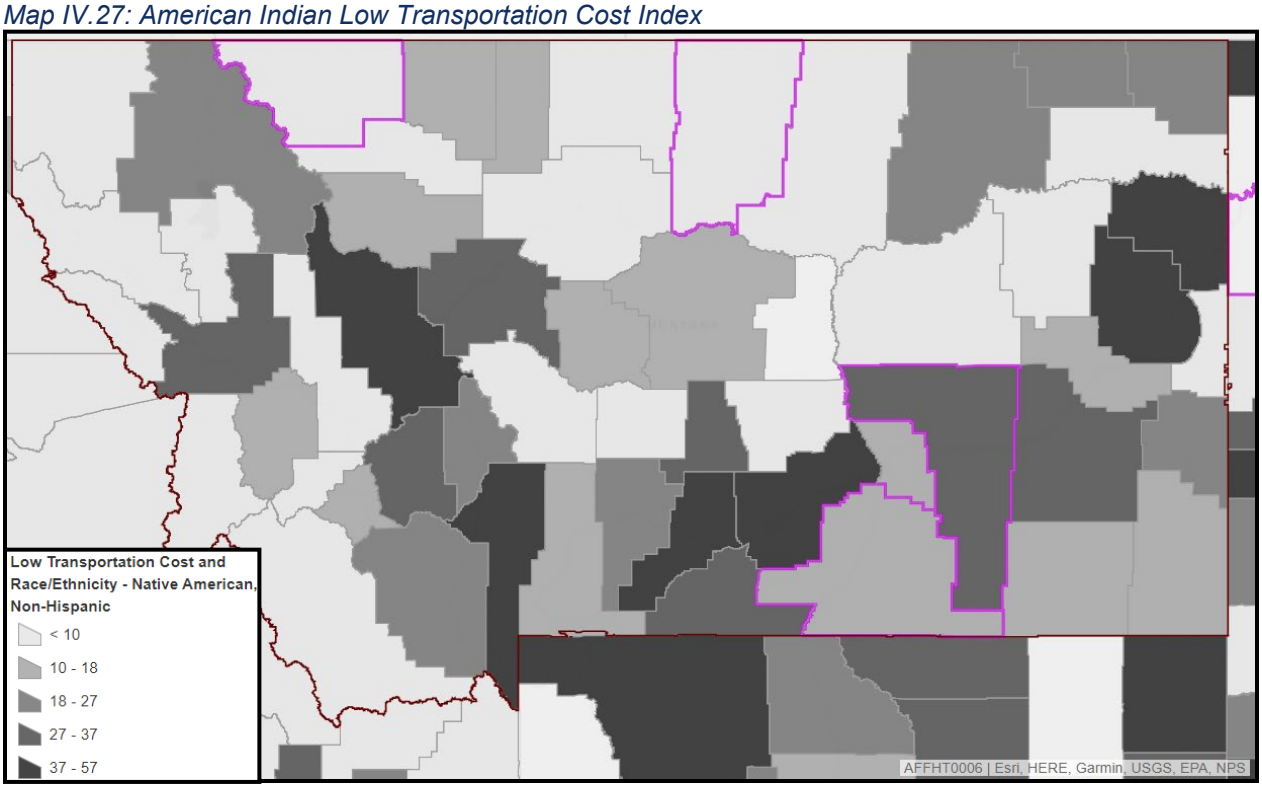
Map IV.26: Black Low Transportation Cost Index



Data Source: HUD AFFH Tool

Darker color = lower transportation cost

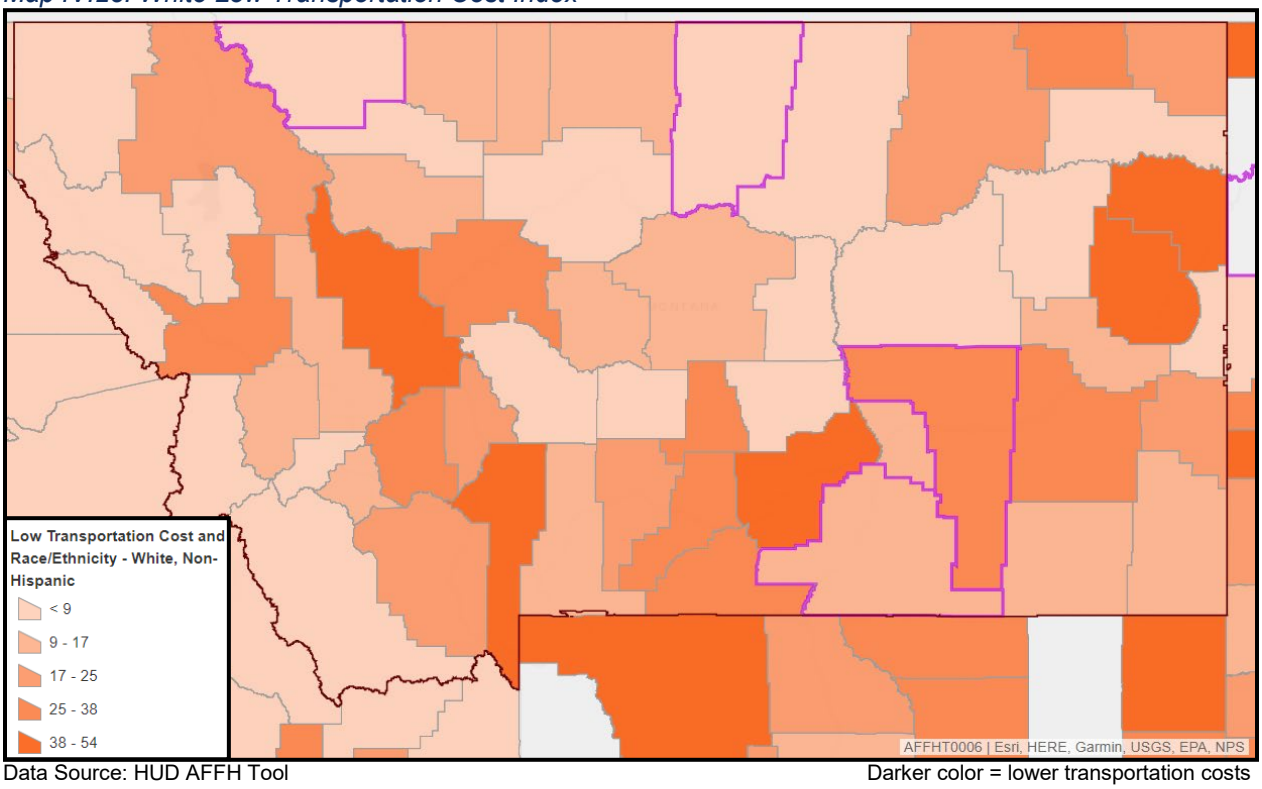
Map IV.27: American Indian Low Transportation Cost Index



Data Source: HUD AFFH Tool

Darker color = lower transportation costs

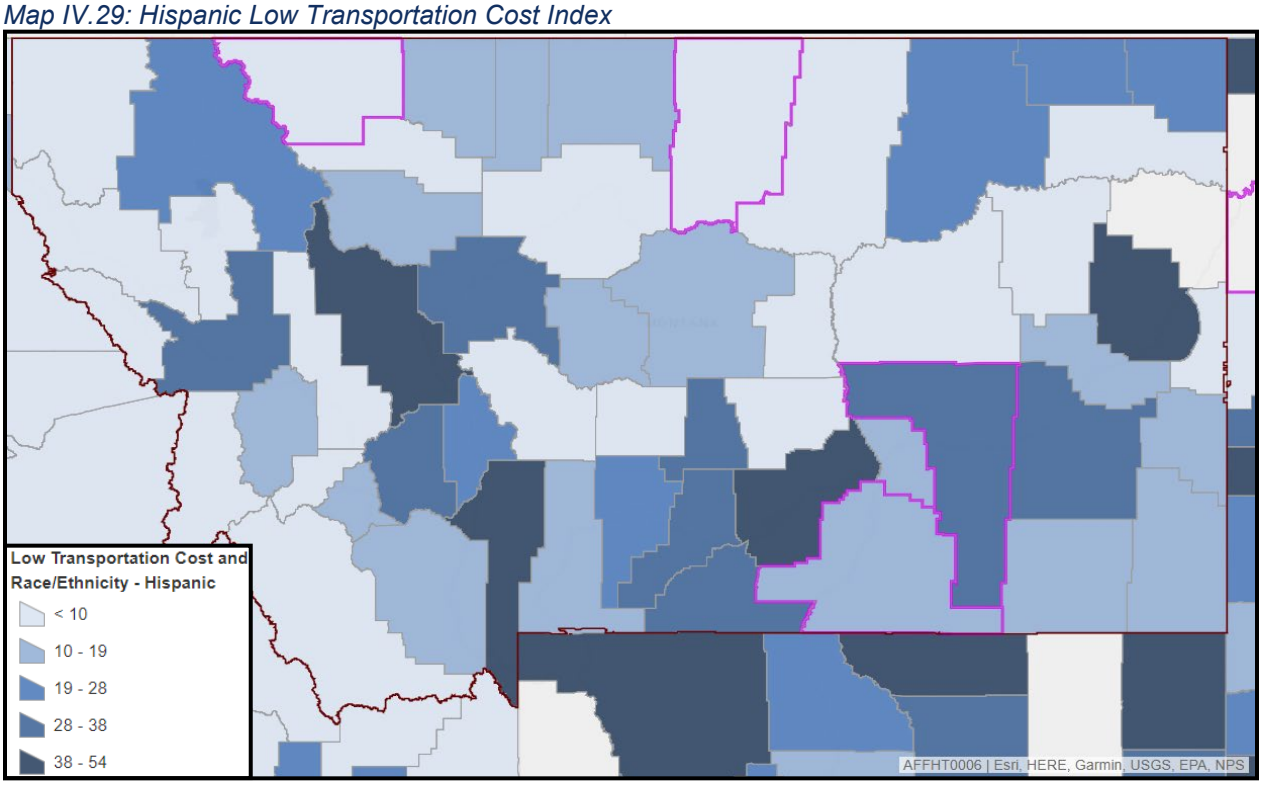
Map IV.28: White Low Transportation Cost Index



Data Source: HUD AFFH Tool

Darker color = lower transportation costs

Map IV.29: Hispanic Low Transportation Cost Index



Data Source: HUD AFFH Tool

Darker color = lower transportation costs

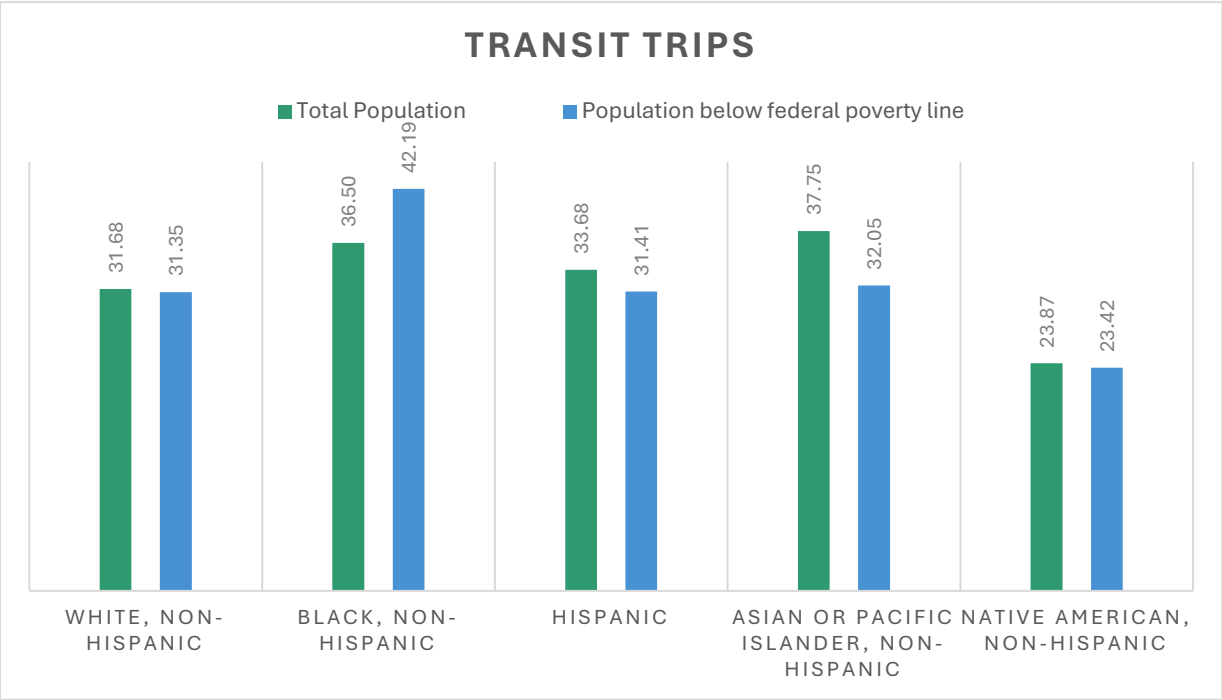
Transit Trips

The Transit Trips Index portrays how often low-income families in a neighborhood use public transportation. The index is based on estimates of transit taken by a 3-person single-parent family with 50% of the median income. The higher the index value, the more likely residents in that neighborhood are to utilize public transit.[10]

The values for Montana are shown in **Diagram IV.5**. According to the Transit Trips Index ratings, Asian or Pacific Islander populations utilize public transportation at the highest rates, and American Indian populations utilize it the least. This corresponds with the Low Transportation Cost Indexes above. The overall index ratings are relatively low compared with national averages, which is presumably due to the lower level of access to public transportation across the state.

[10] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf

Diagram IV.5: Transit Trips Index

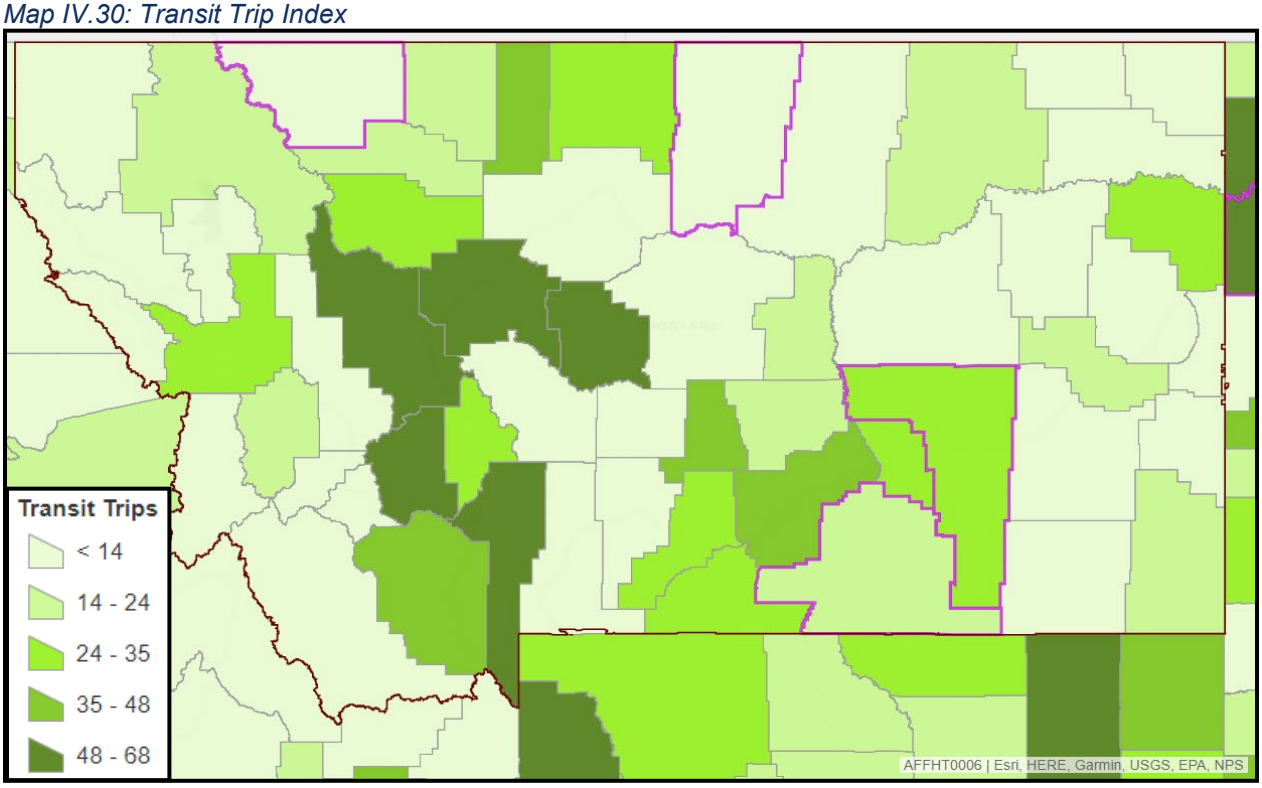


Data Source: HUD AFFH Tool

Geographic Access

Geographic access to higher levels of Transit Trips Index ratings mirrors the geographic distribution of higher levels of low transportation costs. Higher index ratings are found in more densely populated areas. There is little variation geographically by race and ethnicity, as shown in **Maps IV.30** to **IV.35**.

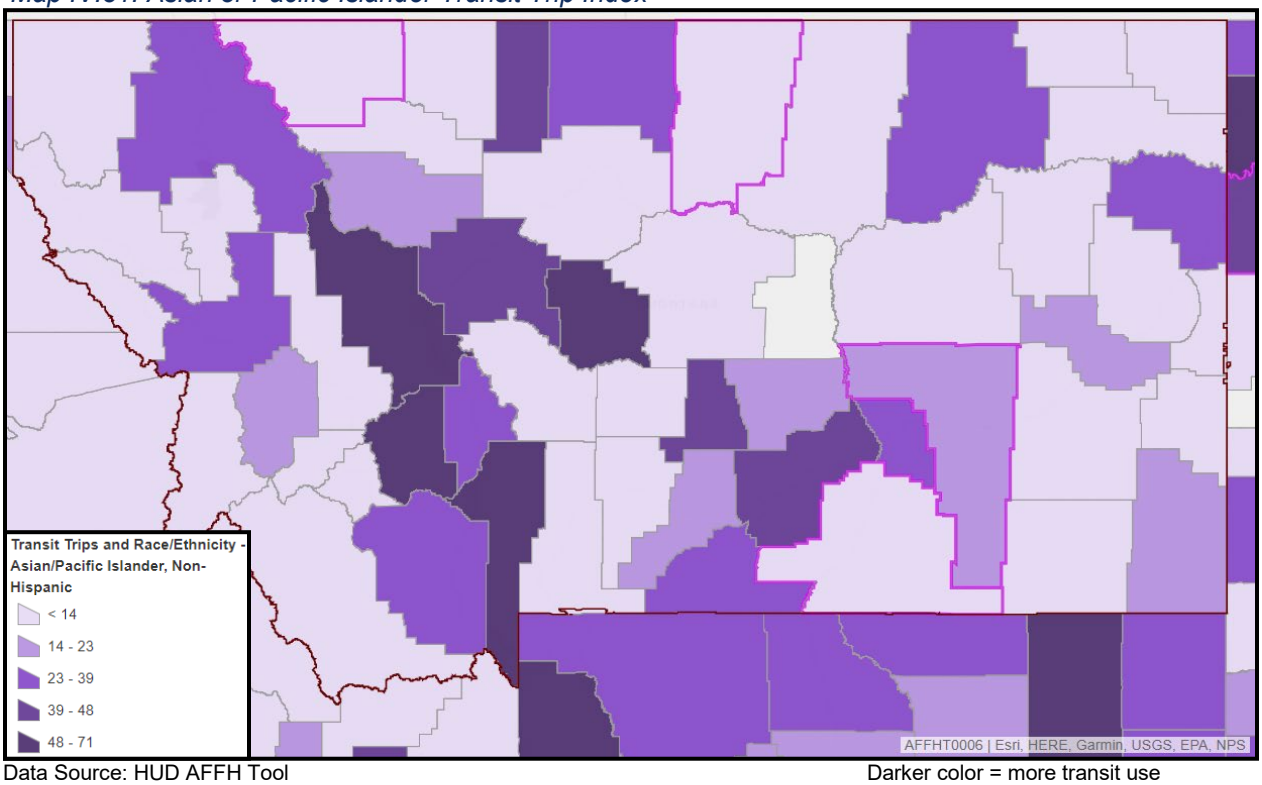
Map IV.30: Transit Trip Index



Data Source: HUD AFFH Tool

Darker color = more transit use

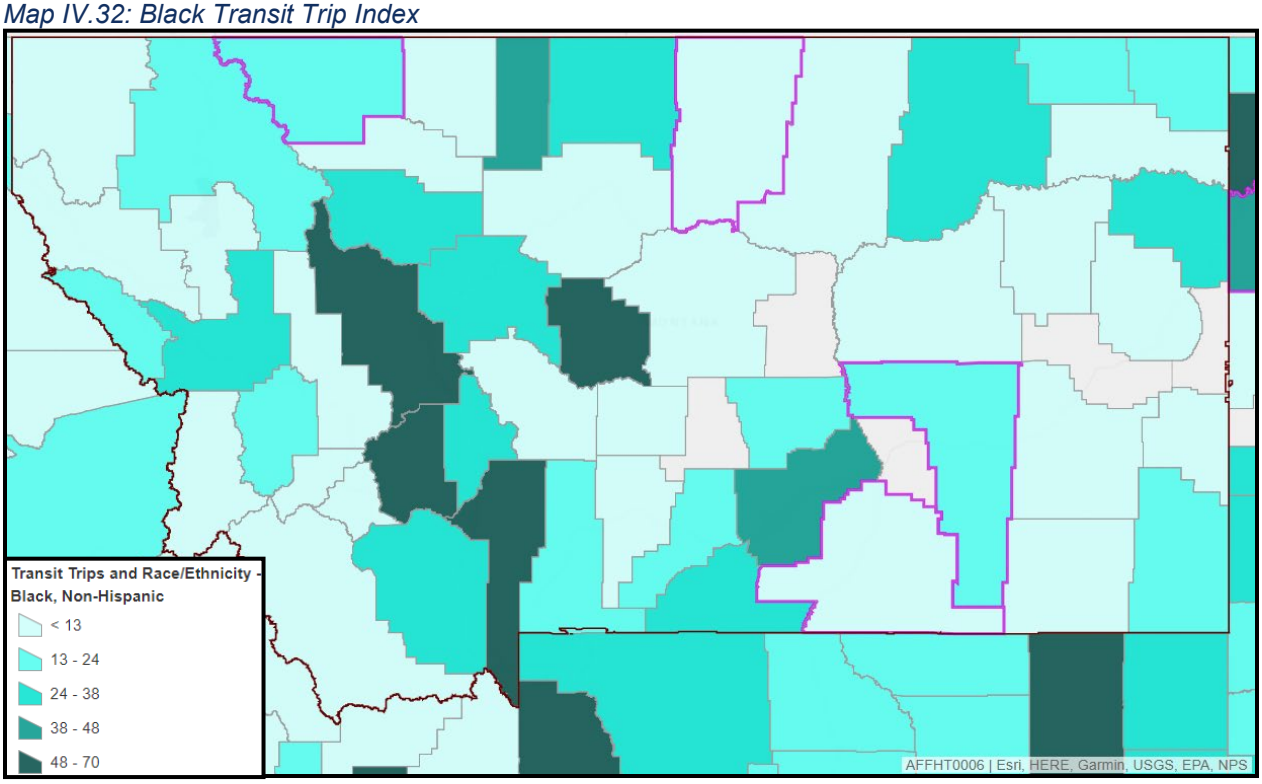
Map IV.31: Asian or Pacific Islander Transit Trip Index



Data Source: HUD AFFH Tool

Darker color = more transit use

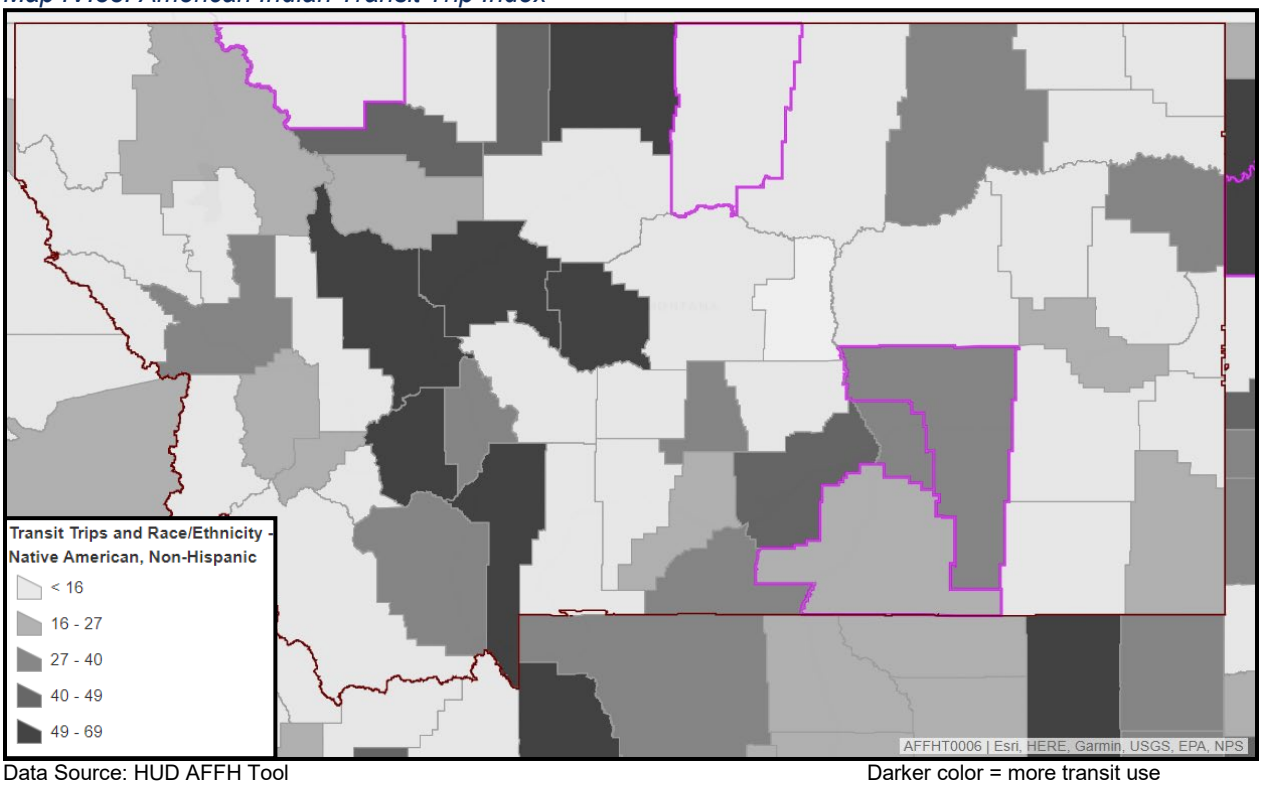
Map IV.32: Black Transit Trip Index



Data Source: HUD AFFH Tool

Darker color = more transit use

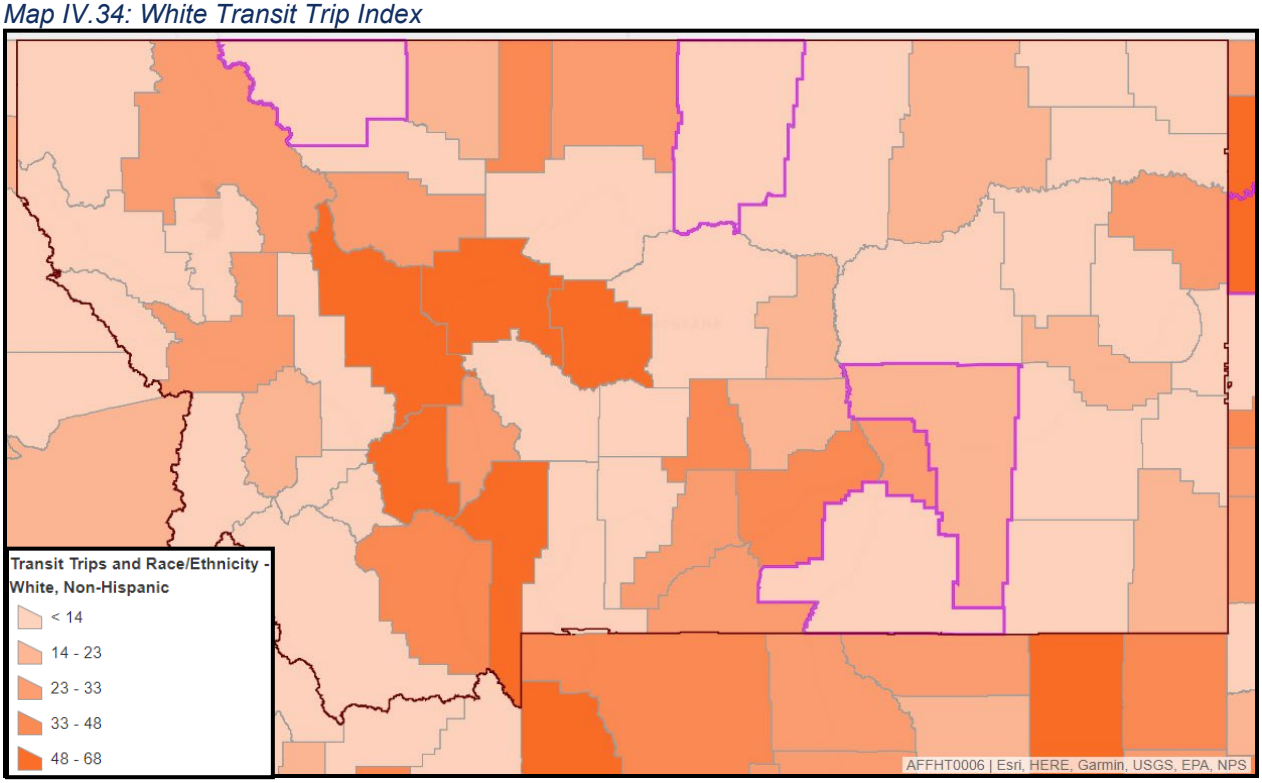
Map IV.33: American Indian Transit Trip Index



Data Source: HUD AFFH Tool

Darker color = more transit use

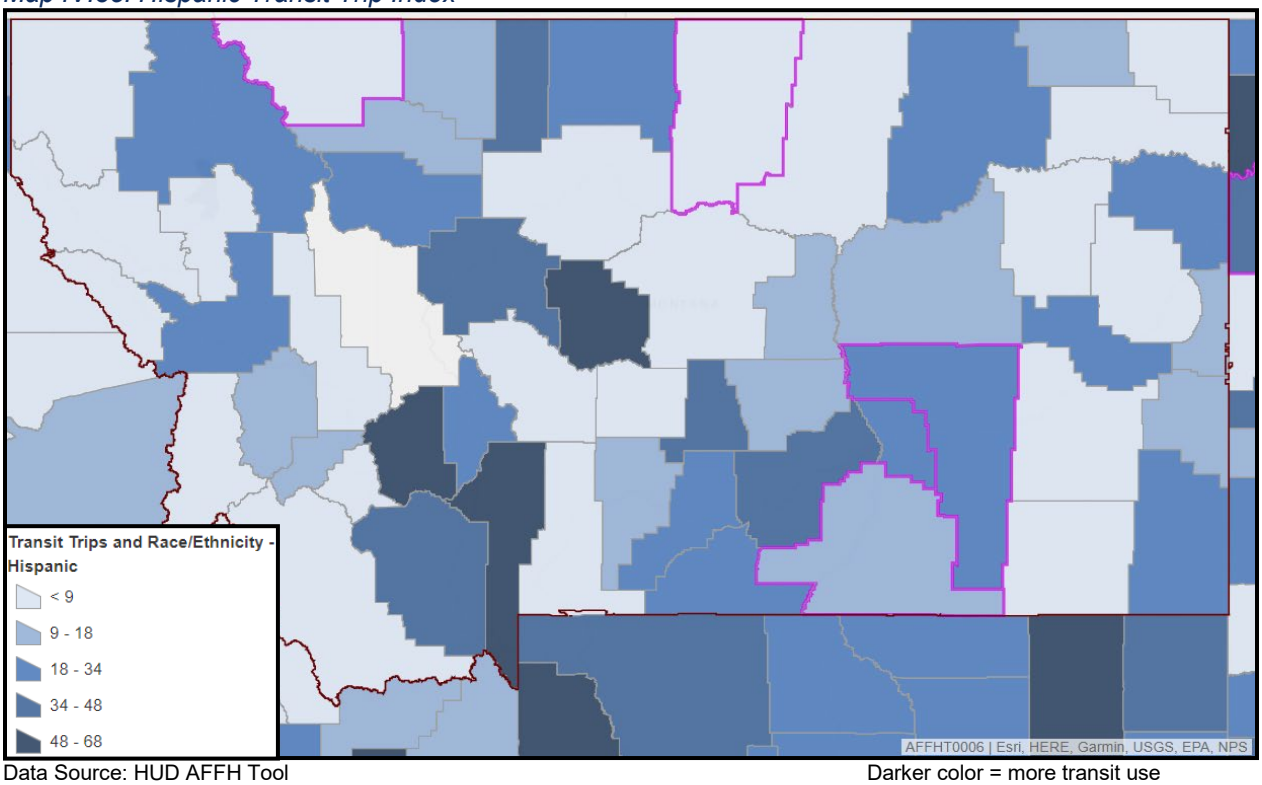
Map IV.34: White Transit Trip Index



Data Source: HUD AFFH Tool

Darker color = more transit use

Map IV.35: Hispanic Transit Trip Index



Data Source: HUD AFFH Tool

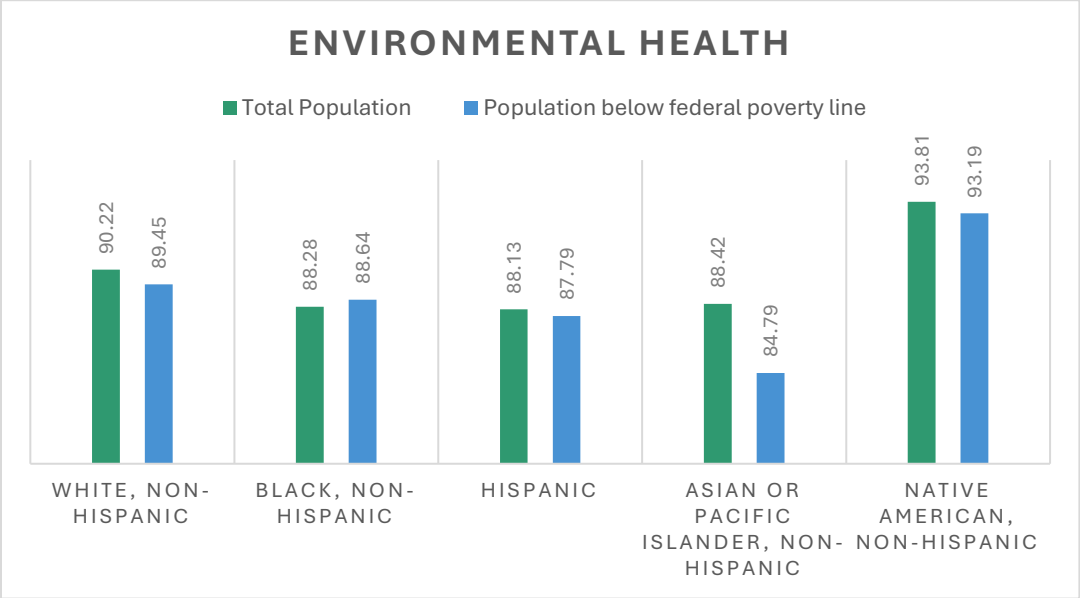
Darker color = more transit use

Environmental Health

The Environmental Health Index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a combination of standardized EPA estimates of air quality carcinogenic, respiratory, and neurological hazards in census tracts.[11]

As shown in **Diagram IV.6**, the Environmental Health Index ratings are high across all racial and ethnic groups in Montana, with ratings above 88 across the board. Populations living below the poverty line have slightly lower index ratings. American Indians have the highest level of Environmental Health Index ratings, at over 93. This is compared with Hispanic and Asian or Pacific Islander populations with ratings of 88.13 and 88.42, respectively.

Diagram IV.6: Environmental Health Index



Data Source: HUD AFFH Tool

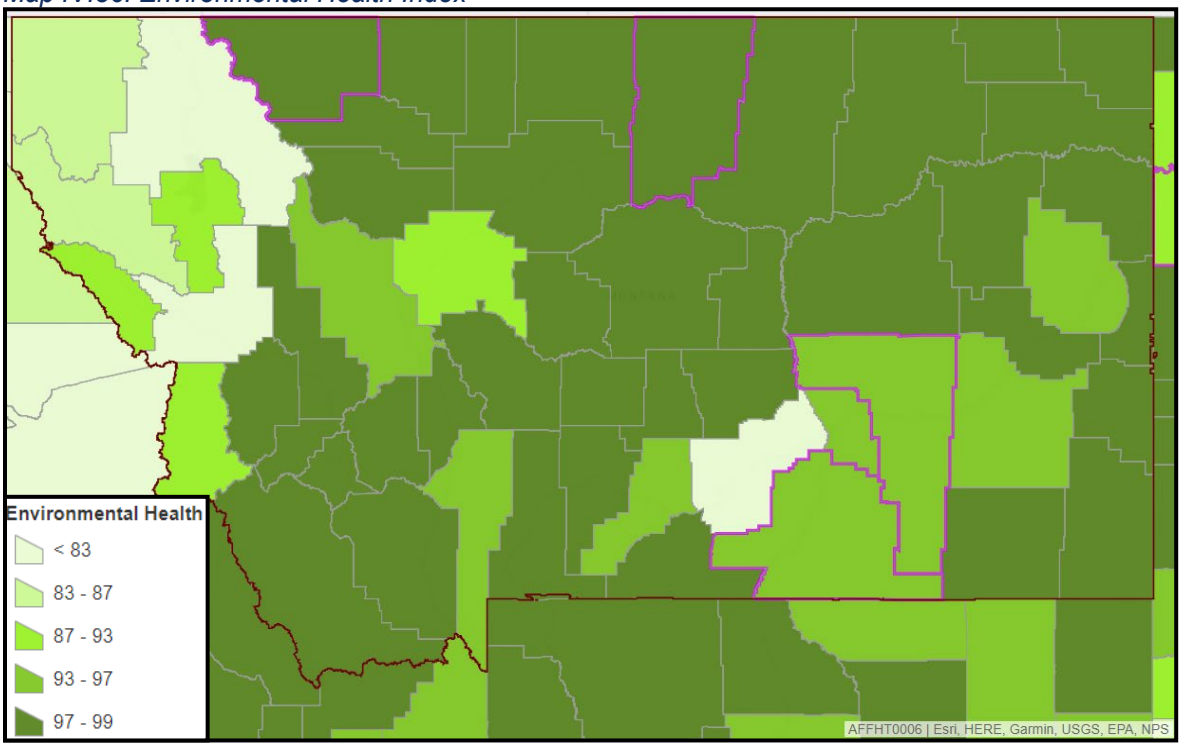
Geographic Access

Large swaths of the state are considered environmentally healthy by the standard of the Environmental Health Index, which is primarily based on EPA air quality data. The level of variation is between 77 and 99 statewide. Lower levels are seen in the northwestern part of the state. R/ECAPs do not have significantly lower levels of access to higher rates of environmental health. The patterns of access to higher rates of environmental health

[11] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf

do not vary significantly by racial and ethnic groups across the state, as demonstrated in **Maps IV.36** to **IV.41**.

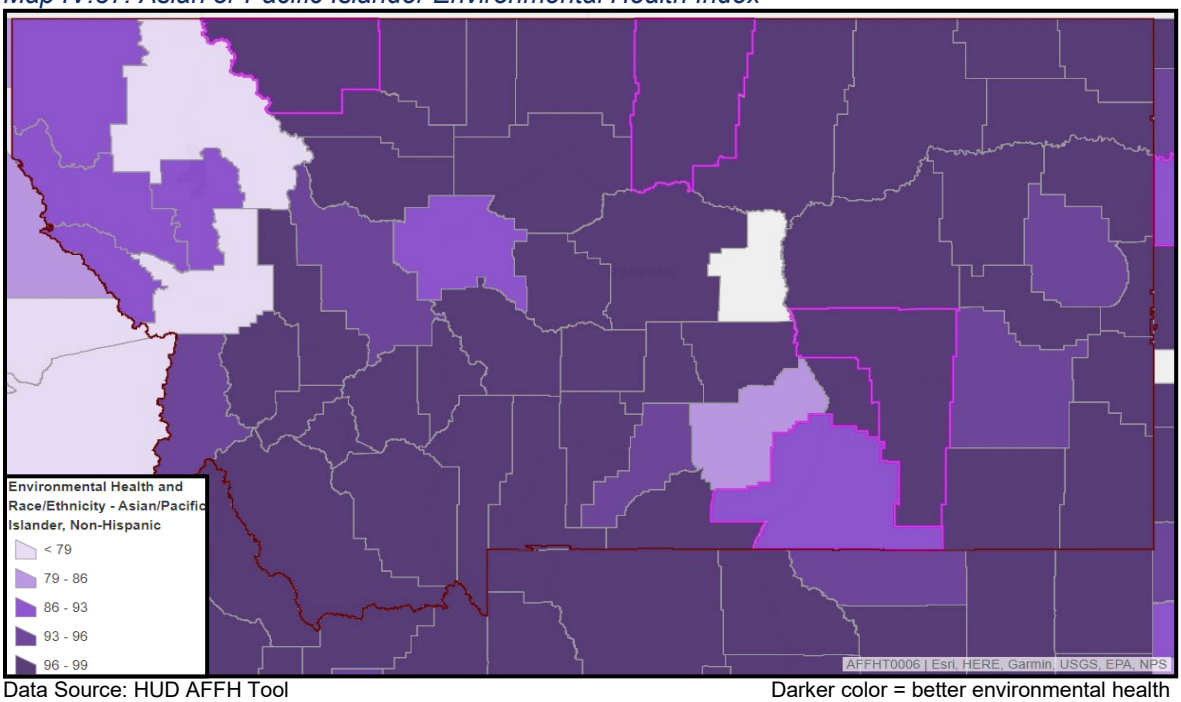
Map IV.36: Environmental Health Index



Data Source: HUD AFFH Tool

Darker color = better environmental health

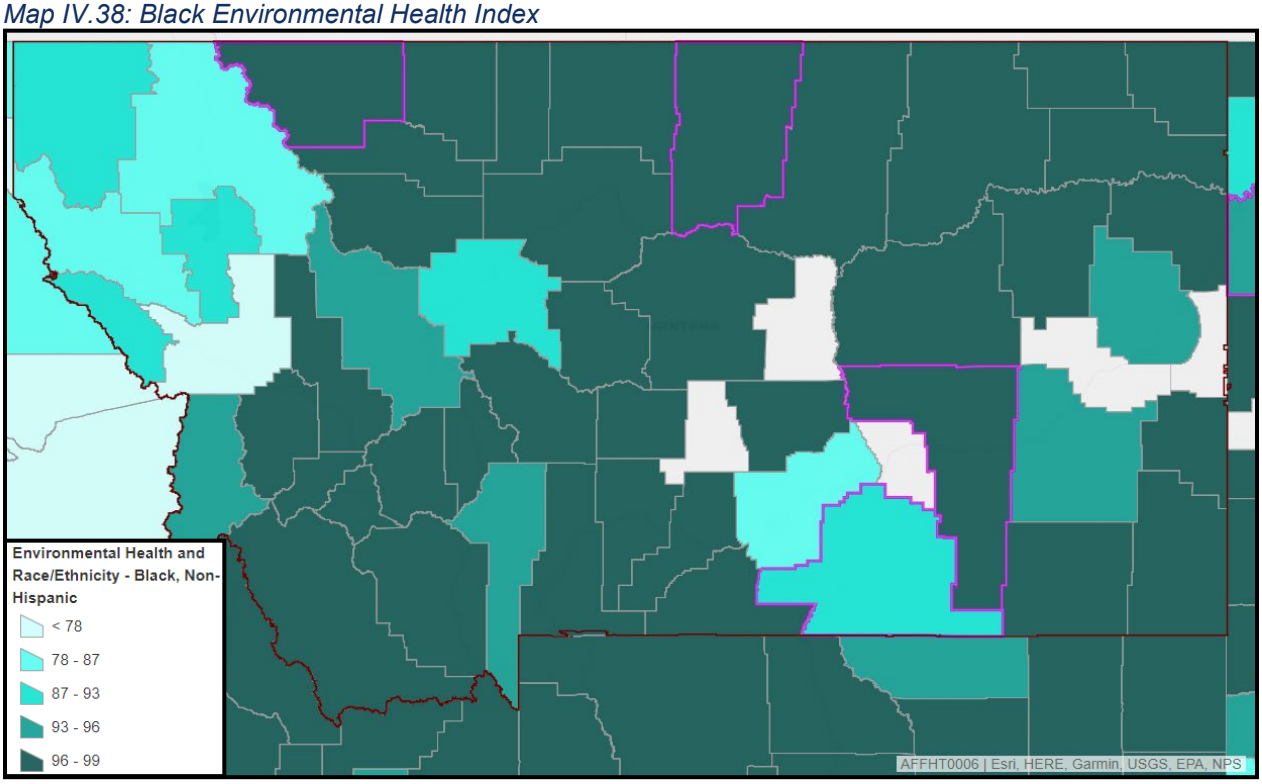
Map IV.37: Asian or Pacific Islander Environmental Health Index



Data Source: HUD AFFH Tool

Darker color = better environmental health

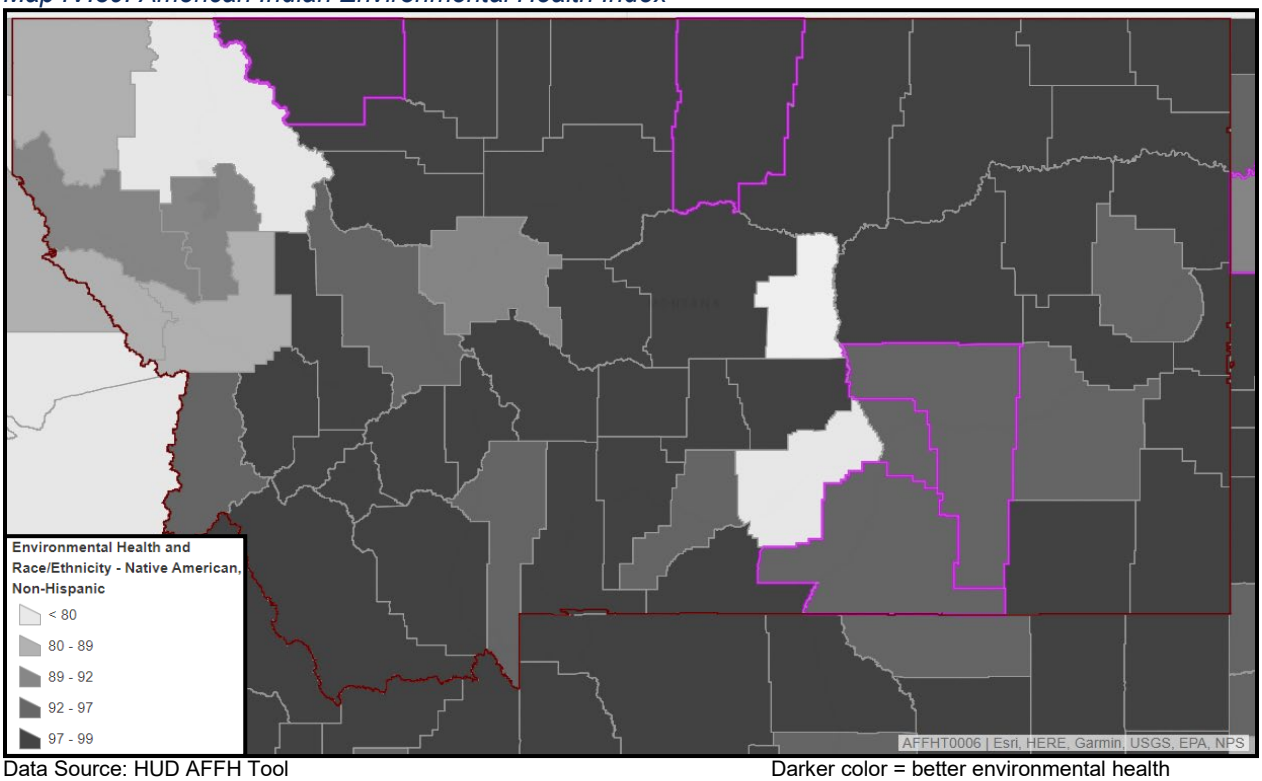
Map IV.38: Black Environmental Health Index



Data Source: HUD AFFH Tool

Darker color = better environmental health

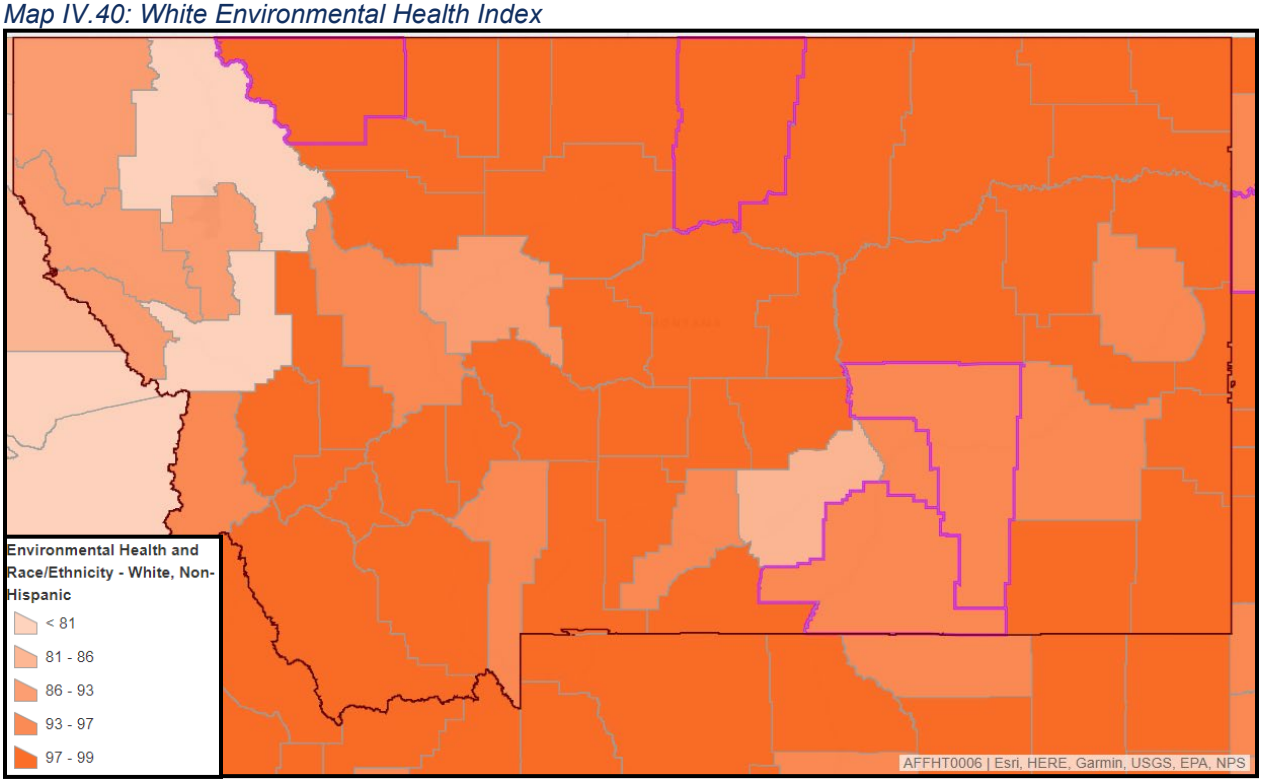
Map IV.39: American Indian Environmental Health Index



Data Source: HUD AFFH Tool

Darker color = better environmental health

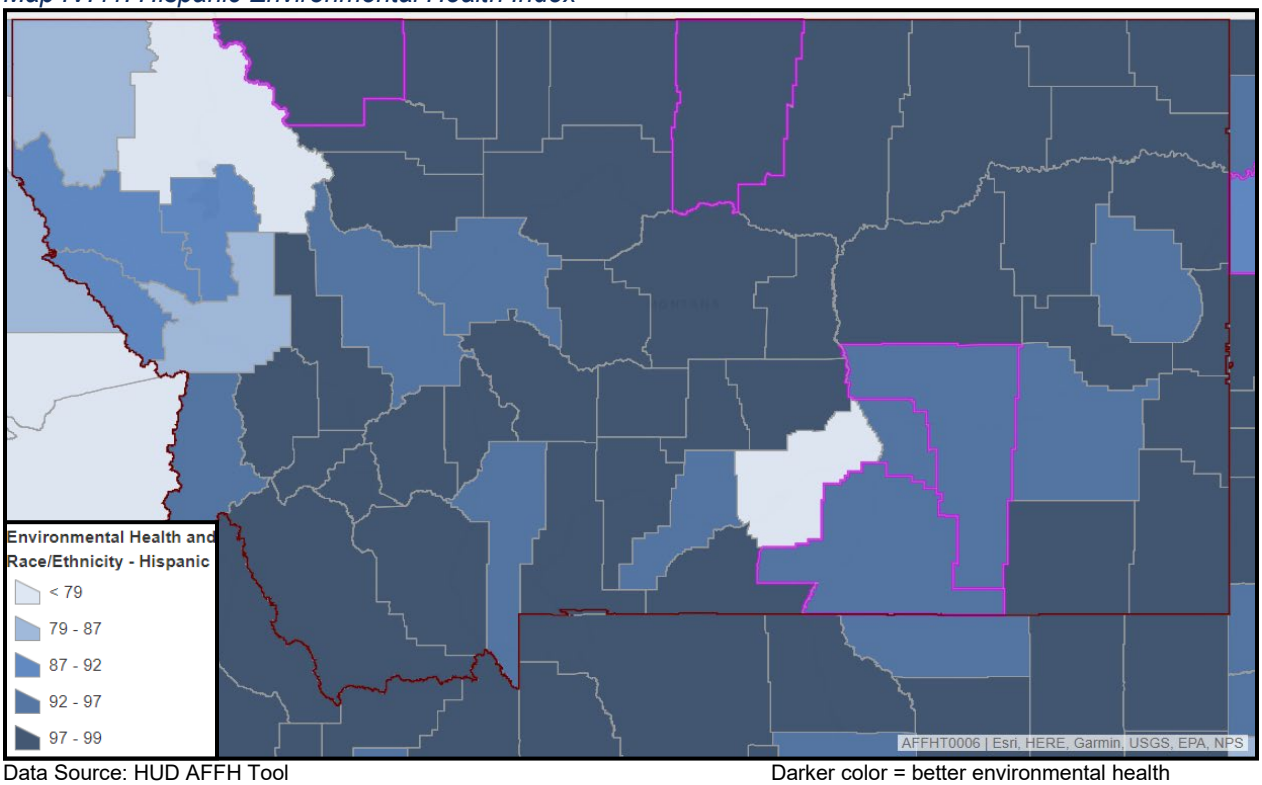
Map IV.40: White Environmental Health Index



Data Source: HUD AFFH Tool

Darker color = better environmental health

Map IV.41: Hispanic Environmental Health Index



Data Source: HUD AFFH Tool

Darker color = better environmental health

Geographic Access to Opportunities

Access to opportunities throughout the state, with the exception of environmental health, tends to be higher in more highly populated areas. These areas also tend to have more access to publicly supported housing and more Housing Choice Voucher use. High Labor Market Engagement Index levels are spread across the state, demonstrating a more equitable level of geographic access than other opportunities. Since households with disabilities are not concentrated heavily in certain areas of the state, there is no noticeable lack of access for disabled households to community assets on a statewide scale. In addition, R/ECAPs and areas with higher segregation tend to have lower levels of access to job proximity and transportation, perhaps due in part to the rural nature of some of these places.

Summary

As discussed throughout this section, access to opportunities varies by race and ethnicity across the state as well as geographically. In terms of geographical variation, it is primarily a juxtaposition of more populous and less populous areas for most opportunities measured. American Indian households in Montana tend to have the lowest access to opportunities. While American Indian reservations are outside of state and local jurisdictions, city, county, and even state policies can and do have a lasting impact on these communities and the households therein. As such, this study notes these inequities in access in its evaluation and priorities. Environmental health is highly rated across the state and does not vary significantly by race and ethnicity.

V. Access to Affordable Housing Opportunities

Housing Problems

Montana's housing stock is aging and as its population continues to grow, supply is not keeping up with demand. As discussed in detail in the 2025-2029 Consolidated Plan, 47.5% of housing units in Montana were built prior to 1980. The Market Analysis of the Consolidated Plan describes the landscape of the current Montana housing stock, which does not provide enough housing to meet current needs for residents, especially considering the influx of growth in recent years.

Housing problems are defined as incomplete kitchen facilities, incomplete plumbing facilities, overcrowding, and cost burden greater than 30%. Severe housing problems are defined as incomplete kitchen facilities, incomplete plumbing facilities, overcrowding, and cost burden greater than 50%. In the nonentitlement areas of Montana, 28.6% of the total

population experiences at least one of these housing problems, compared with 31.4% of households nationwide. An estimated 14.4% of Montanans experience severe housing problems, compared with 16.7% nationwide.

Based on available data, housing problems and severe housing problems vary by race and ethnicity, with Black and Hispanic households experiencing problems disproportionately. Disproportionate housing problems exist if a racial or ethnic group experiences problems at a rate of at least 10 percentage points higher than the average. For the nonentitlement areas of Montana, Black (non-Hispanic) households face housing problems at a rate of 38.6% and Hispanic households at a rate of 39.0%, both meeting the criteria of disproportionate. Black households also experience severe housing problems at a disproportionate rate, at 25.9% compared with 14.4% overall.

Nonfamily households, which are defined as households with one person or households made of people that are not related to one another, experience housing problems at the highest rate, at 38.5%, compared with families with less than five people at 21.0% and families with more than five people at 37.9%.

Housing problems are seen at the highest rates in the western part of the state as well as some areas in the south, as seen in **Map V.1**. Two R/ECAPs also face higher rates of housing problems. This includes Big Horn County where 30.7% of households have at least one housing problem and Glacier County where 30.4% of households do. Missoula County has the highest rate of housing problems, at 36.0%.

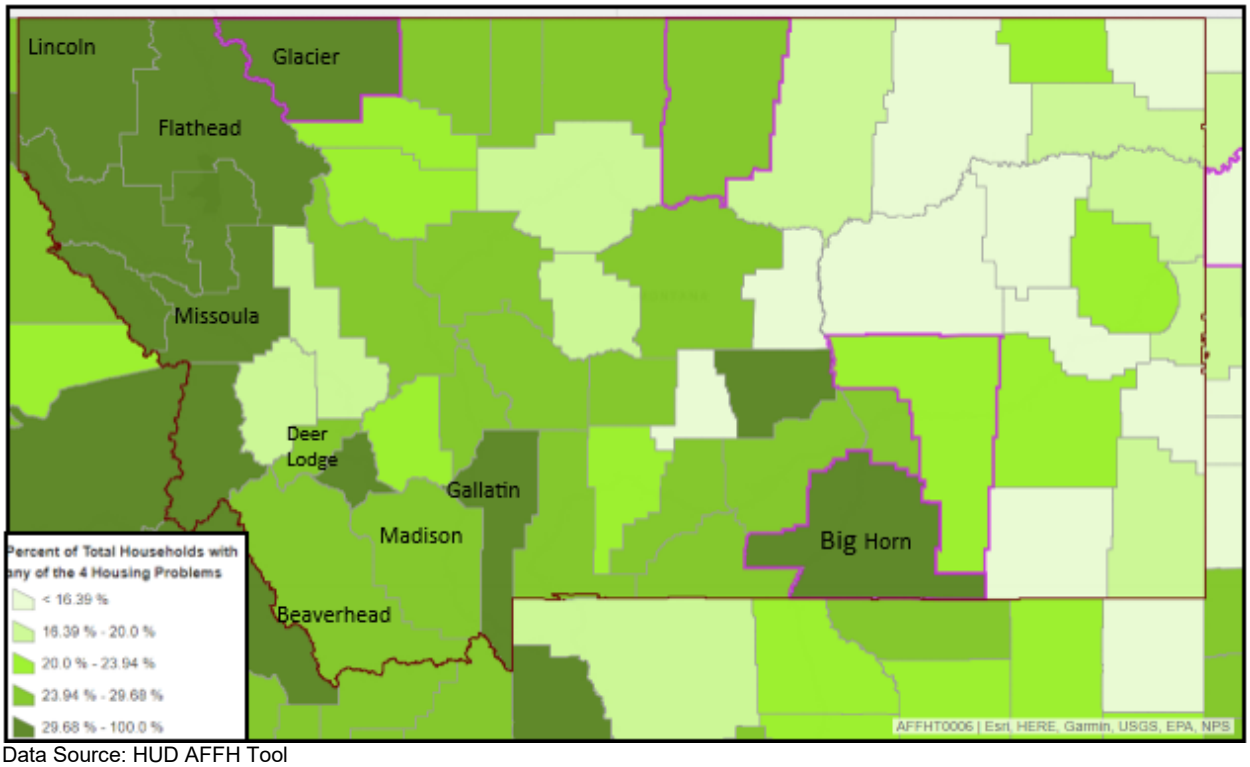
Cost Burdens

Cost Burdens (or paying more than 30% of household income on housing) is the most common housing problem. A severe cost burden (spending more than 50% of household income on housing) is a particular issue when evaluating access to affordable housing. These households are most likely to be at risk of housing instability and lack of access to affordable housing options. In nonentitlement areas of Montana, 11.7% of residents experience severe cost burdens. No racial or ethnic groups experience severe cost burdens at a disproportionate rate. However, Black households experience severe cost burdens at the highest rate at 21.3%, followed by Hispanic households at 17.0%.

Nonfamily households experience severe cost burdens at the highest rate for household types at 18.9%, with less than five-person family households at 8.0% and more than five-person households at 6.7%.

As shown in **Table V.1**, statewide, renters faced overall cost burdens at a rate higher than owners, 38.3% versus 20.1%. This was also true for severe cost burdens, at a rate of 18.7% versus 8.2%.

Map V.1: Housing Problems



Data Source: HUD AFFH Tool

Table V.1: Cost Burdens

Montana	Owner	Renter
Cost Burden	12.0%	19.6%
Severe Cost Burden	8.2%	18.7%
Total	20.1%	38.3%

Data Source: 2022 5-Year ACS State of Montana

Lower-income renter households also face housing cost burdens, not surprisingly, at the highest rate in the state. Households earning less than 30% of the HUD Area Median Family Income experience housing cost burdens at a rate of 75.1%. Of these, 58.4% are experiencing severe cost burdens, or spending more than 50% of their household income on housing

Geographic Distribution of Housing Problems

Housing problems are highest in the northwestern areas of the state as well as in some areas of southern Montana. Two R/ECAPs also face higher rates of housing problems. This includes Big Horn County where 30.7% of households have at least one housing problem and Glacier County where 30.4% of households do. Missoula County has the highest rate of housing problems, at 36.0%. Glacier County is also an area with high levels of segregation, as discussed in the Section II.

Housing quality can be estimated based on the proportion of households experiencing housing problems. The areas with the lowest levels of housing problems include most of eastern Montana. Publicly supported housing units are most likely to be found in areas with higher levels of housing problems. The largest proportion of publicly supported housing units are seen in Missoula, Yellowstone, and Flathead counties, all of which have higher levels of housing problems.

When looking at housing cost burdens in particular, the rates of cost burdens vary widely by county. **Table V.2** shows the rates of cost burdens and severe cost burdens by county. Counties with the highest rates of housing cost burdens overall included Missoula at 31.0%, Gallatin at 30.4%, Lincoln at 30.2% and Sanders at 29.4%. The counties with the highest rate of severe cost burdens for renters (paying more than 50% of income on rent) included Deer Lodge at 33.2%, Beaverhead at 27.1% and Missoula at 23.4%.

Households are continuing to experience homelessness across the state. During the 2023 Point-in-Time count, over 2,100 people were counted, an increase of 23% from the year before. Those at the greatest risk of housing instability and at risk of homelessness due to housing costs are households with severe cost burdens at the lowest income ranges, or below 30% HAMFI. This includes an estimated 12,450 homeowners and 19,085 renters in Montana in 2020 who were at the greatest risk of housing instability by this measure.

Public Input

The Fair Housing Survey asked respondents about the need for various housing types. When asked about what housing needs respondents see in their communities, the majority saw the need for more affordable rental units with 79% of respondents indicating it as a need. This was followed by more affordable homeowner units with 65% of respondents indicating the need for more units. Roughly half of respondents indicated the need for more market-rate single-family homes and more senior housing. Public input from stakeholders and residents also repeatedly suggested the need for housing opportunities for individuals with non-violent criminal records. Many times, these individuals are unable to find available housing. National studies support these claims, finding a majority of formerly incarcerated people have been denied housing accommodations nationwide.

Table V.2: Cost Burdens by County

County	Cost Burden	Owner	Renter	Total	County	Cost Burden	Owner	Renter	Total
Beaverhead	Cost Burden	9.3%	14.5%	25.4%	McCone	Cost Burden	5.5%	2.9%	13.9%
	Severe Cost Burden	7.0%	27.1%			Severe Cost Burden	10.8%	0.0%	
Big Horn	Cost Burden	10.0%	14.1%	18.5%	Meagher	Cost Burden	12.9%	9.1%	22.0%
	Severe Cost Burden	5.7%	9.7%			Severe Cost Burden	10.6%	3.6%	
Blaine	Cost Burden	11.8%	13.9%	23.3%	Mineral	Cost Burden	9.4%	22.1%	20.7%
	Severe Cost Burden	10.4%	11.0%			Severe Cost Burden	8.0%	10.5%	
Broadwater	Cost Burden	9.2%	20.8%	17.6%	Missoula	Cost Burden	14.4%	20.4%	31.0%
	Severe Cost Burden	6.8%	5.2%			Severe Cost Burden	7.5%	23.4%	
Carbon	Cost Burden	11.3%	17.6%	22.5%	Musselshell	Cost Burden	16.7%	22.7%	26.4%
	Severe Cost Burden	8.8%	12.0%			Severe Cost Burden	7.1%	10.9%	
Carter	Cost Burden	10.6%	25.9%	24.9%	Park	Cost Burden	14.8%	19.2%	27.6%
	Severe Cost Burden	12.1%	3.9%			Severe Cost Burden	11.0%	12.4%	
Cascade	Cost Burden	9.8%	22.5%	24.9%	Petroleum	Cost Burden	12.9%	10.7%	18.1%
	Severe Cost Burden	6.9%	18.6%			Severe Cost Burden	8.6%	0.0%	
Chouteau	Cost Burden	8.1%	7.6%	14.7%	Phillips	Cost Burden	10.3%	16.9%	17.3%
	Severe Cost Burden	4.9%	10.3%			Severe Cost Burden	6.4%	2.8%	
Custer	Cost Burden	9.2%	17.2%	23.3%	Pondera	Cost Burden	10.0%	16.1%	18.4%
	Severe Cost Burden	9.7%	15.1%			Severe Cost Burden	5.9%	8.5%	
Daniels	Cost Burden	11.9%	9.7%	19.4%	Powder River	Cost Burden	9.6%	4.2%	12.7%
	Severe Cost Burden	9.6%	2.2%			Severe Cost Burden	5.9%	0.0%	
Dawson	Cost Burden	8.4%	15.0%	18.3%	Powell	Cost Burden	6.3%	20.7%	17.5%
	Severe Cost Burden	3.0%	16.5%			Severe Cost Burden	7.3%	3.1%	
Deer Lodge	Cost Burden	13.6%	11.2%	27.6%	Prairie	Cost Burden	8.0%	13.3%	16.0%
	Severe Cost Burden	5.8%	33.2%			Severe Cost Burden	4.8%	14.3%	
Fallon	Cost Burden	7.1%	6.0%	12.5%	Ravalli	Cost Burden	14.1%	18.1%	28.0%
	Severe Cost Burden	6.5%	4.2%			Severe Cost Burden	10.1%	22.7%	
Fergus	Cost Burden	9.3%	12.4%	22.2%	Richland	Cost Burden	5.0%	13.0%	18.7%
	Severe Cost Burden	7.7%	22.4%			Severe Cost Burden	11.2%	11.2%	
Flathead	Cost Burden	13.0%	23.4%	27.6%	Roosevelt	Cost Burden	6.0%	11.5%	15.8%
	Severe Cost Burden	9.3%	18.9%			Severe Cost Burden	5.7%	11.6%	
Gallatin	Cost Burden	14.4%	20.4%	30.4%	Rosebud	Cost Burden	9.4%	9.0%	18.3%
	Severe Cost Burden	8.3%	22.2%			Severe Cost Burden	8.8%	9.5%	
Garfield	Cost Burden	9.0%	11.1%	20.0%	Sanders	Cost Burden	9.5%	34.2%	29.4%
	Severe Cost Burden	8.3%	14.8%			Severe Cost Burden	11.5%	23.5%	
Glacier	Cost Burden	8.9%	14.8%	19.1%	Sheridan	Cost Burden	7.3%	16.6%	19.9%
	Severe Cost Burden	7.0%	9.2%			Severe Cost Burden	10.3%	10.4%	
Golden Valley	Cost Burden	20.0%	0.0%	21.7%	Silver Bow	Cost Burden	9.3%	13.9%	21.8%
	Severe Cost Burden	4.1%	11.4%			Severe Cost Burden	6.0%	22.6%	
Granite	Cost Burden	12.1%	13.7%	19.1%	Stillwater	Cost Burden	10.8%	23.1%	20.5%
	Severe Cost Burden	6.5%	7.0%			Severe Cost Burden	7.2%	8.0%	
Hill	Cost Burden	7.2%	19.8%	23.0%	Sweet Grass	Cost Burden	5.6%	8.1%	14.8%
	Severe Cost Burden	7.1%	18.4%			Severe Cost Burden	7.9%	10.1%	
Jefferson	Cost Burden	15.4%	11.4%	21.6%	Teton	Cost Burden	10.8%	21.3%	22.9%
	Severe Cost Burden	6.3%	10.0%			Severe Cost Burden	8.0%	12.1%	
Judith Basin	Cost Burden	12.8%	5.7%	23.5%	Toole	Cost Burden	5.7%	15.1%	17.5%
	Severe Cost Burden	10.4%	19.0%			Severe Cost Burden	8.4%	7.9%	
Lake	Cost Burden	14.0%	19.8%	26.9%	Treasure	Cost Burden	15.8%	14.7%	28.4%
	Severe Cost Burden	9.0%	17.3%			Severe Cost Burden	12.1%	14.7%	
Lewis & Clark	Cost Burden	12.7%	18.9%	28.9%	Valley	Cost Burden	7.4%	25.3%	19.5%
	Severe Cost Burden	7.1%	16.6%			Severe Cost Burden	8.2%	6.1%	
Liberty	Cost Burden	2.8%	16.0%	18.7%	Wheatland	Cost Burden	7.4%	9.6%	20.9%
	Severe Cost Burden	9.1%	10.5%			Severe Cost Burden	14.7%	8.0%	
Lincoln	Cost Burden	13.8%	19.9%	30.2%	Wibaux	Cost Burden	6.6%	23.0%	16.0%
	Severe Cost Burden	15.3%	12.8%			Severe Cost Burden	6.3%	4.0%	
Madison	Cost Burden	11.9%	19.3%	24.4%	Yellowstone	Cost Burden	12.0%	22.0%	26.5%
	Severe Cost Burden	12.0%	6.4%			Severe Cost Burden	7.7%	19.6%	

Data Source: 2020 CHAS Data

Housing Problems and American Indian Reservation Lands

As noted previously, American Indian reservation lands overlap with many of the areas discussed in this plan. The Federal Reserve Bank of Minneapolis and the Center for Indian Country Development have created Native Community Data Profiles. The following information has been drawn from these profiles to get a better understanding of the level of housing problems within these communities and in surrounding areas.

The **Blackfeet Reservation** and Off-Reservation Trust Land includes 10,375 people, 85.0% of whom identify as American Indian or Alaskan Native. Of these, 19.5% are cost burdened and 10.3% are overcrowded. An estimated 34.1% of American Indian households residing within the reservation are considered to be living in poverty, and 38.5% of children under the age of 18 are living in poverty. An estimated 71% of Glacier County is within the Blackfeet Reservation.

The **Crow Reservation** and Off-Reservation Trust Land includes 7,353 people, 83.0% of whom identify as American Indian or Alaskan Native. An estimated 15.4% of households are cost-burdened and 14.2% are overcrowded. 34.0% of households experience poverty and 36.5% of children under the age of 18 experience poverty. Crow Reservation is located primarily in Big Horn County, but also extends into Yellowstone and Treasure counties.

The **Flathead Reservation** and Off-Reservation Trust Land includes 31,690 people, 32.3% of whom identify as American Indian or Alaskan Native. About 30.6% of households are cost-burdened and 2.0% are overcrowded. 33.5% of households are living in poverty and 38.2% of children under age 18 are living in poverty. Flathead Reservation is located primarily in Lake and Sanders counties but also extends into Missoula and Flathead counties to the north and south.

The **Fort Belknap Reservation** and Off-Reservation Trust Land includes 3,377 people, 96.3% of whom identify as American Indian or Alaskan Native. Approximately 23.3% of households are cost-burdened and 9.6% are overcrowded. 28.9% of households are living in poverty compared with 38.1% of children under age 18. Fort Belknap Reservation is in southeastern Blaine County and a small portion of western Phillips County.

The **Fort Peck Indian Reservation** and Off-Reservation Trust Land includes 10,126 people, 70.4% of whom identify as American Indian or Alaskan Native. Some 18.1% of households are considered cost-burdened while 3.6% are considered overcrowded. 47.7% of the population is living in poverty, and 51.6% of children under the age of 18 are living in poverty. Fort Peck Reservation includes the entirety of Roosevelt County as well as portions of Valley, Daniels and Sheridan counties.

The **Northern Cheyenne Indian Reservation** and Off-Reservation Trust Land includes 4,460 people, 94.8% of whom identify as American Indian or Alaskan Native. Approximately 20.6% of households are cost-burdened and 14.7% are overcrowded. 39.4% of households are living in poverty and 51.8% of children under the age of 18 are

living in poverty. Northern Cheyenne Reservation is located in Big Horn and Rosebud counties.

The **Rocky Boy's Reservation** and Off-Reservation Trust Land includes 3,613 people, 97.0% of whom identify as American Indian or Alaskan Native. About 16.5% of households are cost-burdened and 6.3% are overcrowded. 31.9% of households are living in poverty compared with 34.6% of children under 18. Rocky Boy's Reservation is located in Hill and Chouteau counties.

Summary

Housing problems are experienced by Montanans across the state, with cost burdens especially impacting residents. Minority racial and ethnic groups do not tend to face disproportionate rates of housing problems but may face housing problems at a higher rate than their White counterparts. Nonfamily households also face housing problems at a higher rate than family households. The rate of housing problems also varies geographically, with northwestern Montana seeing the largest concentration of housing problems. Counties with the highest rates of housing cost burdens overall include Missoula, Gallatin, Lincoln, and Sanders counties. Cost burdens impact lower-income households the most and have potential to cause housing instability and put households at risk of homelessness. Households below 30% HAMFI and with severe cost burdens are at the greatest risk. In 2020, there were an estimated 12,450 homeowners and 19,085 renters in Montana who were at the greatest risk of housing instability by this measure.

VI. Access to Affordable Homeownership and Economic Opportunity

Homeownership

Homeownership rates in Montana have stayed steady since 2010 with 69.0% of Montana residents owning a home, according to 2022 5-Year ACS estimates. Homeowners experience housing problems and housing cost burdens at lower rates than rental households. Statewide, an estimated 8.2% of owner households experience severe cost burden, while 20.1% experience cost burdens. A decade ago, the rate of cost burden for homeowners was 14.8% while severe cost burden was 9.1%. Today, lower-income owner households are most likely to experience cost burdens and severe cost burdens, at a rate of 69.8% and 49.9%, respectively for households with incomes below 30% HAMFI.

For homeowners, Lincoln and Madison counties had the highest rates of severe cost burdens, with 15.3% of Lincoln County homeowners and 12.0% of Madison County homeowners facing severe cost burdens, as seen in **Map V.1**, in the previous section.

Access to Mortgages

One way people access affordable homeownership is through mortgages. The Home Mortgage Disclosure Act provides data about mortgage applications. This includes mortgage denials by race and ethnicity. This can be utilized to understand whether there are any racial or ethnic groups that face a disproportionate share of mortgage denials in Montana. When looking at denial rates by sex, denial rates for males and females varied between 2018 and 2022 but were within three percentage points each year.

In 2022, there were 47,859 loan applications originated. Of these, a total of 6,275 were denied. There was an overall denial rate in Montana of 13.1% in 2022. The rate of denials by race and ethnicity, however, varied. In 2022, applicants who identified as two or more races had the highest denial rate, at 42.1%. However, this only represented a total denial of 16 applicants and may not be statistically significant. American Indian or Alaskan Native applicants had a disproportionately higher rate of mortgage denials than applicants overall, at 26.1%, which is twice that of the overall denial rate for the state.

Since 2018, Black or African American, and Native Hawaiian or other Pacific Islander applicants have faced a disproportionate share of denials. In each of these instances, the denial rates for these minority groups have exceeded ten percentage points of the statewide average for denials. However, these denials also represent small populations when considered against the total population of the state, and account for less than 2% of annual denials.

Table VI.1 presents mortgage denial rates by race over time.

Table VI.1: Mortgage Denial Rates by Race

Race or Ethnicity	2018	2019	2020	2021	2022
American Indian or Alaska Native	23.6%	23.0%	17.5%	16.7%	26.1%
Asian	13.7%	15.4%	14.1%	9.8%	16.8%
Black or African American	16.5%	24.0%	14.9%	15.8%	22.3%
Native Hawaiian or Other Pacific Islander	11.8%	16.0%	26.8%	6.7%	26.2%
White	13.3%	12.0%	9.2%	9.7%	13.6%
Two or More Races	21.4%	23.8%	13.6%	12.8%	42.1%
Not Available	7.8%	6.8%	7.0%	7.8%	10.2%
Total	**12.4%**	**11.2%**	**8.9%**	**9.4%**	**13.1%**

Data Source: HMDA Data State of Montana

Property taxes are additional costs homeowners face to pay for housing. In Montana, property taxes have been 1.35% for residential properties since 2018. Some jurisdictions also levy mill levies, which help pay for local services and schools. Beginning in 2023, residential properties will be reappraised every two years. In addition to property taxes, homeowners' insurance is an on-going expense for households. According to the National Association of Realtors, the average rate for homeowners' insurance in Montana is $1,997 in 2024 and is expected to increase by 24% during the year. This is one of the fifth-steepest rates of increase expected nationally in 2024, behind Louisiana, Maine, Michigan, and Utah.[12]

Access to Economic Opportunities

Access to economic opportunities can be measured in a variety of ways. This section will explore poverty and median income levels for various subsections of the Montana population. These measures can be broken down by race and ethnicity and family types, as well as by place of birth and disability status for poverty rates.

Poverty

Poverty levels varied by race and ethnicity in 2022, with American Indian and Alaskan Native populations experiencing the highest rates of poverty, at 35.1%. Black populations experienced poverty at a rate of 17.1% and those that identified as two or more races at a rate of 17.0%. In terms of ethnicity, the Hispanic population experienced poverty at a rate of 17.0%. **Table VI.2** shows these rates in tabular form.

[12] https://www.nar.realtor/magazine/real-estate-news/states-where-home-insurance-costs-are-surging-highest

Table VI.2: Poverty by Race and Ethnicity

Race and Ethnicity	% in poverty
White	10.7%
Black or African American	17.1%
American Indian and Alaska Native	35.1%
Asian	12.9%
Native Hawaiian and Other Pacific Islander	4.5%
Some other race	17.0%
Two or more races	15.0%
Hispanic or Latino origin (of any race)	17.0%

Data Source: 2022 5-Year ACS State of Montana

As reflected in **Table VI.3**, different household types also experienced poverty at varying rates, with families with female households (and no spouse present) having the highest rate of 27.2%. Households with "other" living arrangements experienced poverty at a rate of 24.2%. These rates are significantly higher than for family households overall, at 9.2% and in married-couple families at 4.9%.

Table VI.3: Poverty by Family Type

Household Types	% in poverty
In family households	9.2%
In married-couple family	4.9%
In Female householder, no spouse present households	27.2%
In other living arrangements	24.2%

Data Source: 2022 5-Year ACS State of Montana

As shown in **Table VI.4**, foreign-born households experience poverty at similar rates as native-born households, at 12.9% and 12.4%, respectively. Naturalized households have a slightly lower level of poverty at 9.1%.

Table VI.4: Poverty by Place of Birth

Place of Birth	% in poverty
Native	12.4%
Foreign born	12.9%
Naturalized citizen	9.1%

Data Source: 2022 5-Year ACS State of Montana

People with a disability experience poverty at a rate almost eight percentage points higher than the population without a disability, at 19.1% versus 11.3% (**Table VI.5**).

Table VI.5: Poverty by Disability Status

Disability Status	% in poverty
With any disability	19.1%
No disability	11.3%

Data Source: 2022 5-Year ACS State of Montana

Median Income

The median household income for all Montanans in 2022 was $66,341. Median household income levels varied however, by race and ethnicity, as well as by family type. White households had the highest median household income at $68,005, aside from "other" race households at $69,964. American Indian and Alaskan Native households had the lowest median household income at $39,077. Asian households have seen the greatest growth in median household income since 2010, aside from "other" race households. American Indian and Alaskan Native households have seen the lowest growth during this same time period. **Table VI.6** presents median household income by race and ethnicity and shows change in income from 2010 to 2022 for each racial and ethnic group.

Table VI.6: Median Household Income by Race and Ethnicity

Race and Ethnicity	2010	2022	% change 2010-2022
White	$44,928	$68,005	51.4%
Black or African American	$34,079	$50,676	48.7%
American Indian and Alaska Native	$28,561	$39,077	36.8%
Asian	$34,732	$62,390	79.6%
Native Hawaiian and Other Pacific Islander	$62,143	$55,000	-11.5%
Some other race	$36,101	$69,964	93.8%
Two or more races	$34,104	$59,100	73.3%
Hispanic or Latino origin (of any race)	$32,182	$54,890	70.6%
Total	**$43,872**	**$66,341**	**51.2%**

Data Source: 2022 5-Year ACS State of Montana

Family and nonfamily households had decidedly different median household incomes in 2022. The median household income for family households was $84,027 and for nonfamily households it was $39,863. Married couples with their own children under the age of 18 had the highest median income in 2022 at $106,633. Female households with no spouse present had the lowest median income of family households, at $33,721. For nonfamily households, male householders not living alone had the highest income at $72,607, and female householders living alone had the lowest at $32,028. In terms of growth since 2010, in family households, female householders (with no spouse present) experienced the highest rate of growth. In nonfamily households, female householders not living alone experienced the highest rate of growth. Median household income by household type is provided in **Table VI.7**.

Table VI.7: Median Household Income by Household Type

Household Type	2010	2022	% change 2010-22
Families	$55,725	$84,027	50.8%
With own children of householder under 18 years	$53,472	$84,205	57.5%
With no own children of householder under 18 years	$57,221	$83,930	46.7%
Married-couple families	$62,796	$95,586	52.2%
With own children under 18 years	-	$106,633	
Female householder, no spouse present	$24,842	$41,968	68.9%
With own children under 18 years	-	$33,721	
Male householder, no spouse present	$37,525	$56,345	50.2%
With own children under 18 years	-	$51,102	
Nonfamily households	$25,972	$39,863	53.5%
Female householder	$22,608	$36,282	60.5%
Living alone	$20,438	$32,028	56.7%
Not living alone	$41,935	$69,206	65.0%
Male householder	$30,297	$44,151	45.7%
Living alone	$26,382	$37,312	41.4%
Not living alone	$47,335	$72,607	53.4%

Data Source: 2022 5-Year ACS State of Montana

Incomes for Seniors

An estimated 60.0% of senior households have incomes less than $60,000 a year. On the other end of the spectrum, 12.6% of senior households have incomes over $125,000 a year. The remaining 27.4% of households have incomes between $60,000 and $125,000 a year. The households at the lowest range of income are expected to have the most difficult time affording housing, especially if their housing needs are changing due to increasing levels of disabilities or other life circumstances. There are over 45,000 senior households in Montana that are earning less than $30,000 annually. Household incomes for Montana's seniors are displayed in **Table VI.8**.

Table VI.8: Household Income for Householders 65 and Older

Income	Percentage of Households
Less than $10,000	6.2%
$10,000 to $14,999	7.9%
$15,000 to $19,999	6.4%
$20,000 to $24,999	5.9%
$25,000 to $29,999	5.8%
$30,000 to $34,999	4.7%
$35,000 to $39,999	5.2%
$40,000 to $44,999	5.6%
$45,000 to $49,999	3.7%
$50,000 to $59,999	8.6%
$60,000 to $74,999	10.0%
$75,000 to $99,999	10.4%
$100,000 to $124,999	7.1%
$125,000 to $149,999	3.9%
$150,000 to $199,999	4.4%
$200,000 or more	4.4%

Data Source: 2022 5-Year ACS State of Montana

Summary

Access to affordable homeownership and economic opportunities varies in Montana by race and ethnicity, family type, and disability status. American Indian or Alaskan Native households, female-headed households, and households with disabilities tend to have higher rates of poverty or lower median household incomes statewide. However, the state has seen positive growth in recent years, especially for incomes of female-headed households.

While local and state policies do not have a direct impact on income rates for households, policy can impact homeownership rates in communities. In addition to local policies, there may be avenues to promote outreach and education for targeted households to receive additional support for homebuying in Montana.

VII. Local and State Policies and Practices Impacting Fair Housing

Local and state policies impact fair housing through the promotion and implementation of fair housing practices. Part of this promotion includes limiting barriers to accessing housing, as well as promoting access to housing and community assets. As a statewide plan, this section will look primarily at the efforts of statewide and regional policies but will also include an overview of any identified local barriers or incentives.

Fair Housing in Montana is promoted by the following entities:

Montana Human Rights Bureau enforces certain state and federal laws that prohibit discrimination. In addition, the Bureau provides training opportunities to tenants and housing providers.

PO Box 1728
Helena, MT 59624-1728
Telephone: 1-800-542-0807
Fax: 406-443-3234
erd.dli.mt.gov/human-rights/human-rights-laws/housing-discrimination/

Montana Fair Housing's mission is to promote and ensure nondiscrimination in Montana through outreach, education, dispute resolution, and enforcement.

501 East Front Street
Suite 533
Butte, MT 59701
Telephone: 406-782-2573 or 1-800-929-2611
Montana Relay: 711
Fax: 406-782-2781
montanafairhousing.org/

Local Laws and Promotion of Fair Housing

The 2024 Fair Housing Survey was conducted to gauge the understanding of fair housing laws in the state, as well as to see how housing is advocated across Montana. The survey was distributed via multiple means including email and online distribution as well as through printed copies at meetings and other in-person events. Some 181 respondents completed the survey. The most respondents came from Lewis and Clark County (18), Lincoln County (17), Missoula County (17), and Sanders County (17).

The Fair Housing Survey asked respondents about barriers to housing development in communities. Commonly identified barriers included the cost of construction with 78% of respondents citing this as a barrier, cost of labor and materials at 72%, and cost of land at 64%. Zoning restrictions, lack of community support, and development and permitting fees were at the bottom of the list of barriers with only 16% to 22% of respondents indicating these factors as barriers to housing development in their communities. However, only 39% of respondents are aware of policies in their communities to actively promote affordable housing.

In addition to survey responses, consultation with stakeholders has indicated that local zoning policies, including minimum lot sizes and maximum density requirements, limit affordable housing development in many communities.

Survey responses and stakeholder input indicate that local laws may not directly impede affordable housing development, but they do not encourage development through less restrictive zoning requirements or proactive measures to allow additional housing opportunities.

State Laws

Landlord-Tenant Laws

According to Chapter 24 of Montana Code Title 70. Property Chapter 24. Residential Landlord and Tenant Act of 1977, landlords must give tenants 15-day notice of rent-related issues, such as increased rent. A tenant has three days to pay overdue rent or move before a landlord can file for an eviction. Landlords must have just cause to evict a tenant, such as nonpayment of rent, violation of lease terms, or substantial damage to the property.

The tenant rights in Montana are below what they are in many other states, where 30 days is the standard for notification and eviction procedures. Shorter eviction times present challenges for households, especially lower-income renters with limited resources to accommodate increased rents.

Statewide Initiatives

Commerce utilizes federal funding annually to develop affordable housing options throughout the state. These initiatives are targeted to both tenants and homebuyers, and housing developers, to help promote development to meet the needs of Montana residents. Ranking priorities for HOME Investment Partnerships Program and Housing Trust Fund projects include Geographic Diversity and Housing Needs, Capacity of the Applicant, Affordability, and Financial Feasibility, Appropriate Design and Long-Term Solution, Long-term Planning and Management, and Readiness to Proceed. These selection criteria help ensure funded projects are meeting the housing needs of residents

in Montana and are occurring in areas with capacity to sustain development. Commerce also provides programs for rental assistance and homeownership.

In addition to HUD Community Planning and Development formula funds, Montana Board of Housing has a variety of funding sources for development, such as:

- Coal Trust Multifamily Homes Program: New construction, acquisition, and/or rehabilitation of existing multifamily rental homes; Acquisition of land for multifamily rental homes including land trusts for rental, mobile or manufactured housing projects; and Development or preservation of a mobile home park.
- Multifamily Loan Program: Residential rental homes that may be new construction and acquisition with substantial rehabilitation with complete living units. No funds are currently available for this program.
- Conduit Bond Program: Financing a mortgage loan made to a sponsor of a multifamily housing project located in the State of Montana for the construction, acquisition, or rehabilitation of a Project which incorporates the use of low-income housing tax credits. No funds have currently been appropriated to this program.
- Housing Montana Fund: Matching funds, bridge financing, acquisition of existing housing stock, preconstruction technical assistance, acquisition of land for housing developments, land banking, and land trusts.
- Low Income Housing Tax Credit: Supports the development of affordable housing in accordance with the annual Qualified Allocation Plan.

Equitable Access to Homeownership

There are statewide efforts to help ensure equitable access to homeownership in Montana. Commerce makes all determinations with respect to the adequacy of the borrower's income in a uniform manner without regard to race, color, religion, sex, national origin, familial status, disability, marital status, actual or perceived sexual orientation, gender identity, source of income of the borrower, or location of the property.[13] The Bond Advantage Down Payment Assistance Program and the MBOH Plus 0% Deferred Down Payment Assistance Program provide homebuyer assistance to first-time homebuyers. The Montana Board of Housing also offers homebuyer education through a contractual relationship with NeighborWorks Montana to help Montana residents prepare for and navigate the homebuying process, HOME Homebuyer Assistance, Veterans Affairs Supportive Housing, and Home Repair. The Montana Homeowner Assistance Fund helps to mitigate financial hardships to prevent mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and

[13] https://housing.mt.gov/Homeownership/Homeowners

displacements of homeowners experiencing financial hardship after January 21, 2020, as a temporary HOME-American Rescue Plan fund program.[14]

Eviction Prevention

Commerce partners with Montana Legal Services Association to fund the Montana Eviction Intervention Program, which works to prevent eviction by helping people understand and navigate the eviction process; enforcing renter rights to safe housing; negotiating with landlords; and providing housing navigators to assist clients in finding alternative housing.[15] This program is funded by the American Rescue Plan Act and will not be a permanent program.

Senate Bill 382

The Montana Land Use Panning Act was passed in 2023 and enacted broad-sweeping land use legislation. The bill aims to modernize the development process by limiting public hearings on housing projects, allowing development approvals to proceed by right after early public engagement, and requiring local governments to establish planning commissions, set population growth projections, and adopt a minimum number of pro-housing strategies.

House Bill 819

House Bill 819 established a Reinvestment Plan Account to fund community reinvestment organizations to help eligible households purchase deed-restricted housing. This program, funded by a $50 million state investment, targets service workers earning 60-140 percent of the median income in Montana, and can partner with local employers for employment retention.

Housing Task Force

The Montana Housing Task Force, established in July 2022, is a bipartisan group tasked with recommending affordable housing solutions across regulation, planning, construction, and financial aspects. It has already submitted written reports to the governor, with a Phase III report to be completed prior to the 2025 Legislative Session.

Public Housing Authorities

The Rental Assistance Bureau within Commerce is the Public Housing Authority for the State of Montana. Commerce administers the HUD Housing Choice Voucher Program (and associated programs) and the Moderate Rehabilitation Program. Commerce also

[14] https://housing.mt.gov/Homeownership/Homeowner-Assistance-Fund
[15] https://housing.mt.gov/Rental-Assistance/Montana-Emergency-Rental-Assistance-Program

serves as Project Based Contract Administrator for Montana's HUD Project-Based Section 8 Portfolio.

Partnerships and Outreach

Commerce works with a number of outside agencies to support local administration of the HCV and related programs. These include Action for Eastern Montana, Opportunities, Inc., District 6 Human Resource Development Council, District 7 Human Resources Development Council, District 9 Human Resources Development Council, Community Action Partnership of Northwest Montana, District XI Human Resource Council, Action, Inc., Helena Housing Authority, and HomeFront Partners.

In addition to its partnerships, the State has solicited community and stakeholder feedback on the PHA FY2025 Administrative Plan, as well as with the development of this Fair Housing Equity Plan. This has included public forums and publication of draft documents.

Nondiscrimination and Compliance

The Montana PHA Administrative Plan Update outlines nondiscrimination policies. This policy outlines steps to file a complaint of discrimination and mandates the policy for investigation. The Plan defines the resources available for people with disabilities and limited English proficiency, as well as the steps to request reasonable accommodations. Commerce monitors compliance with all stated nondiscrimination policies, federal laws, and regulations.

Mobility and Portability

The PHA Administration Plan outlines the mobility and portability of HCVs. According to HUD guidelines, a participant family or an applicant family that has been issued a voucher has the right to use tenant-based voucher assistance to lease a unit anywhere in the United States providing that the unit is located within the jurisdiction of a PHA administering a tenant-based voucher program. For a family to be eligible for portability, they must be income eligible in the area where they plan to move and must leave their current unit in "good standing." New families may not be able to port immediately; they may have to live in the jurisdiction of the initial PHA for a year before they can port. Initial PHAs may allow moves during the first year.[16]

[16] https://housing.mt.gov/Rental-Assistance/Portability

Similarly, households have the right to move, generally contingent upon the family's compliance with program requirements. HUD specifies two conditions under which a PHA may deny a move, which include insufficient funding or denial/termination of assistance.[17]

Fair Housing Education

According to the 2024 Fair Housing Survey, 41% of respondents are aware of fair housing laws in Montana, 39% are somewhat aware, and 19% are not aware. The survey found that 37% of respondents are aware of policies to promote fair housing in their communities. Of the 181 respondents to the survey, 29 have witnessed or experienced housing discrimination. Additional public responses indicated the need to address housing discrimination based on gender identity, age, and source of income.

The Fair Housing Survey and public input suggest the need for additional fair housing education and outreach for tenants, landlords, and communities.

VIII. Summary of Fair Housing Analysis

Demographics in Montana, and the nonentitlement areas, have shifted as a whole and within the protected classes. While becoming more racially and ethnically diverse, Montanans are also seeing lower rates of families with children and fewer people with limited English proficiency. The demographics in publicly supported housing closely mimic the racial and ethnic makeup of the nonentitlement areas as a whole, as does the population in public housing.

Segregation and Integration

Segregation in the state is most apparent for American Indian populations. American Indian segregation is predominantly seen in areas of American Indian reservations. Other racial or ethnic groups and people with disabilities do not see widespread segregation. Publicly supported housing units and voucher use do not correlate with areas of segregation.

R/ECAPs

There are four R/ECAP counties in Montana and these areas are 90.5% American Indian. The other racial make-up of R/ECAPs are 4.8% White, 3.1% Hispanic, and 0.1% Black and Asian or Pacific Islander. The R/ECAPs tend to align with areas of American Indian reservations which accounts for the larger proportion of American Indians residing in

[17] chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://housing.mt.gov/_shared/RentalHousing/docs/2025-Admin-Plan/10MovingFinal.pdf

R/ECAP areas. However, the rate of poverty in these areas is disproportionate to other areas, resulting in the American Indian population in Montana living at highly disproportionate rates of poverty. In fact, 20% of American Indians in Montana live in a R/ECAP while 0.08% of White Montanans do. In addition, more than half of the households living in R/ECAPs in Montana are families with children. Publicly supported housing units are not concentrated in R/ECAPs.

Access to Community Assets

Access to community assets is marked by variation across race and ethnicity. The American Indian population in Montana sees disproportionately lower ratings for the Low Poverty Index, School Proficiency Index, Labor Market Index and Low Transportation Cost Index. All other racial and ethnic groups are within ten index points of White index ratings. In this instance, White population index ratings are used for comparison because the White population is the majority at over 83%. More rural areas of the state have less access to transportation and employment opportunities.

Access to Affordable Housing Opportunities

Cost burdens are the singular most common housing problem in Montana. The rate of housing cost burdens varies geographically as well as by income. Counties with the highest rates of housing cost burdens overall (all households paying more than 30% of their income on housing) included Missoula, Gallatin, Lincoln, and Sanders counties at rates between 29% and 31%. The counties with the highest rate of severe cost burdens for renters (paying more than 50% of income on rent) included Deer Lodge, Beaverhead, and Missoula counties, at rates between 22% to 33% of renters. For homeowners, Lincoln and Madison counties had the highest rates of severe cost burdens, with 15.3% of Lincoln County homeowners and 12.0% of Madison County homeowners facing severe cost burdens.

Households with the lowest incomes in Montana are facing the highest rates of cost burdens. 75.1% of renters with incomes below 30% HAMFI face cost burdens. Of these, 58.4% are severely cost-burdened. Similarly, 69.8% of homeowners below 30% HAMFI are cost-burdened, and of those 49.9% are severely cost-burdened.

Overall, renters also face higher rates of cost burdens and housing problems than homeowners, at 38.3% for renters versus 20.1% for homeowners.

Access to Affordable Homeownership and Economic Opportunities

Homeownership rates have remained steady in Montana in recent years, even as cost burdens for homeowners have increased in the last decade. Households can access affordable homeownership through mortgages. As presented by HMDA data in this study, American Indian or Alaskan Native mortgage applicants have a disproportionately higher mortgage denial rate than the overall mortgage denial rate for mortgages for Montana applicants since 2018.

Economic opportunity can be measured in many ways. Household income and poverty levels are two ways to systematically compare economic equity across the state population. Economic opportunity varies for Montanans. Most notably poverty rates in Montana show disparate contrast by various groups including American Indians, female-headed households, and people with disabilities. While the overall poverty rate in Montana in 2022 was 12.4%, the poverty rate for American Indians was 35.1%. The poverty rate for female-headed households was 27.2% and the poverty rate for people with a disability was 19.1%. These rates put households at greater risk of housing problems and homelessness than the general population. As discussed above, those with the lowest incomes had the highest rates of severe cost burdens.

While local and statewide policies do not have a direct impact on income rates for these households, policy can impact homeownership in communities. In addition to local policies, there may be avenues to promote outreach and education for targeted households to receive additional support for homebuying in Montana.

Fair Housing Issues

Fair Housing Issues are conditions in a program participant's geographic area of analysis that restricts fair housing choice or access to opportunity and community assets. These can be restrictions that have been imposed by laws and statutes, unintended consequences of past actions, or even the result of compounded historical decisions. Nevertheless, these restrictions are limitations on a group of people, a geographic place, or a protected class within the state. Montana's Fair Housing Issues are identified below. In the subsequent section, they are prioritized as a high priority or low priority based on the prioritization presented herein.

Fair Housing Issues are identified through the process of the Fair Housing Analysis. This analysis, coupled with the public input process, stakeholder input, and consultation efforts, defines the Fair Housing Issues presented below. Each issue is accompanied by supporting documentation. Additional support for each issue is found in the Fair Housing Analysis.

No Fair Housing Issues have been identified by gender, households with families, or publicly supported housing users.

Issue 1: Barriers for American Indian Households to Access Housing and Community Assets

1.1: Disproportionately Less Access to Mortgages for American Indian Applicants

American Indian households have been shown to have continued higher rates of mortgage denial rates than the overall denial rates for Montana applicants. While there are many reasons for mortgage denials, including debt-to-income ratio, credit history, and other factors, the impact of these should generally be felt equally across racial groups. This may be an opportunity for education, outreach, and

targeted homebuyer assistance to mitigate barriers for American Indian homebuyers in need in Montana.

1.2: Disproportionately Higher Rates of Poverty for American Indians

American Indian households face poverty rates higher than any other racial or ethnic group in Montana, which can have other long-lasting impacts on individuals, households, and communities. Similar to the impact of lower levels of access to community assets and higher occupation of R/ECAPs, disproportionate rates of poverty limit opportunity and access to housing.

1.3: Lower Levels of Access to Community Assets for American Indians

As seen by the opportunity index ratings above, American Indian households have less access to community assets based on the Low Poverty Index, School Proficiency Index, Labor Market Index, and Low Transportation Cost Index.

1.4: R/ECAPs Occur in Communities with American Indian Poverty

An estimated 20% of American Indians in Montana live in a R/ECAP while 0.08% of White Montanans do. This disproportionate representation of the American Indian population in R/ECAPs in Montana results in fewer opportunities for American Indian households to access opportunities and housing options. These disproportionate rates call for additional supports in R/ECAPs.

Issue 2: Barriers for Low-Income Households to Access Housing

2.1: Higher Rates of Cost Burden for Low-Income Households

Low-income households in Montana face cost burdens at a significantly higher rate than moderate-income households. More than three-quarters of renter households below 30% HAMFI experience cost burdens and almost 70% of homeowners in this income range experience cost burdens. Households in this lowest income range with severe cost burdens are at the greatest risk of housing instability. In 2020, there were an estimated 12,450 homeowners and 19,085 renters in Montana that were at the greatest risk of housing instability by this measure.

Issue 3: Barriers for Renter Households to Access Housing

3.1: Renter Households Face Higher Rates of Cost Burdens Statewide

In addition to low-income households overall facing housing cost burdens at higher rates, renters also see more challenges in accessing affordable housing. On average, renters face overall cost burdens at a rate 18 percentage points higher than homeowners. This varies geographically within Montana with counties such as Deer Lodge, Beaverhead, and Missoula seeing the highest rates of severe cost burdens for renters.

Issue 4: Barriers for Seniors and Households with Disabilities to Access Housing

4.1: Senior Households and Households with Disabilities Face Increased Levels of Housing Need Statewide

While data did not show disproportionate shares of housing problems systemically for seniors, public input and stakeholder engagement found that senior households have increasingly higher levels of need when accessing housing and services. As the senior population increases, this need is expected to grow as well. In addition, households with disabilities face difficulties finding housing, particularly accessible housing in many parts of the state, as demonstrated by public input and stakeholder feedback. Public input also suggested the need for visitability standards for housing and public facilities. Commerce continues to promote visitability standards through funding priorities and guidelines.

Issue 5: Barriers to Providing Adequate Community Support

5.1: Lack of Resources

An overall lack of federal, state, local, and private resources is available to fulfill the needs of the state. Private development has not kept pace with the growing population of the state, nor with its changing demographics. In addition, publicly supported housing does not have sufficient funds to meet the needs of eligible households.

5.2: Lack of Federal-Level Data

Federal data is insufficient or inadequate, especially pertaining to American Indian populations. As American Indians make up a large and integral part of the Montana population, any instances when American Indians are included in the “other” race category is counter-productive to inclusivity. Specifically, the dissimilarity index does not include American Indian versus White calculations. The lack of federal data in this instance makes the investigation of the fair housing process more arduous and less inclusive for this study’s purpose.

5.3: Lack of Fair Housing Knowledge

The Fair Housing Survey indicated there is a need for additional outreach and education statewide about fair housing laws and resources. An estimated 41% of respondents to the Fair Housing Survey are aware of fair housing laws and 37% are aware of policies promoting fair housing in their communities.

5.4: Institutional Barriers

Current federal regulations are prohibitive for many communities to effectively use federal funds. Federal reporting and qualifications are quite burdensome for small and rural communities. Furthermore, in the case of Montana, investments on American Indian reservations also face unique challenges. These include limitations in CDBG regulations in contracting with tribal governments and tribal housing authorities, restrictions of environmental regulations including noise impacts on rail lines, and Buy America Build America impact costs. Findings in this

study implicate that the strategic use of funds on American Indian reservations would benefit not only reservation residents but also the state as a whole.

5.5: State and Local Barriers

State tenant-landlord laws limit tenant rights, exacerbating evictions and the housing crisis for many at-risk households in Montana. However, landlords must have just cause for eviction proceedings, such as nonpayment of rent, violation of lease terms, or substantial damage to the property. In addition, the lack of affordable housing incentivization in local communities limits the development of additional affordable housing stock, resulting in ever-decreasing options for an ever-increasing population.

Prioritization of Fair Housing Issues

Fair Housing Issues are prioritized based on the level of urgency, the severity of the issue, and the capacity of Commerce and other state agencies to impact change. This prioritization process is the culmination of the Fair Housing Analysis and review of the Fair Housing Issues. Each Fair Housing Issue will also be associated with a Fair Housing Goal.

Issue 1: Barriers for American Indian Households to Access Housing and Community Assets

1.1: Disproportionately Less Access to Mortgages for American Indian Applicants

Priority: High

Justification: With mortgage denial rates at nearly twice that of the average, American Indian applicants in Montana are in need of additional support. Not only is this a highly disproportionate rate of inequitable access, but it is also within the capacity of Commerce to help mitigate and, therefore, is a high priority.

1.2: Disproportionately Higher Rates of Poverty for American Indians

Priority: High

Justification: Poverty impacts American Indian households at higher rates than any other racial or ethnic group in Montana. The impact of poverty on housing and access to other opportunities is far-reaching. The importance and urgency of this issue makes this a high priority for this Fair Housing Equity Plan.

1.3: Lower Levels of Access to Community Assets for American Indians

Priority: High

Justification: American Indian households were the one racial or ethnic group to have consistently lower levels of access to community assets in Montana. This level of inequity must be taken into consideration and evaluated and is considered to be a high priority as a Fair Housing Issue.

1.4: R/ECAPs Occur in Communities with American Indian Poverty

Priority: High

Justification: American Indian households make up over 90% of the R/ECAP occupants in Montana. This disproportionate representation ensures this receives a high priority to be addressed as a Fair Housing Issue.

Issue 2: Barriers for Low-Income Households to Access Housing

2.1: Higher Rates of Cost Burden for Low-Income Households

Priority: High

Justification: The rate at which extremely low-income households experience cost burdens can easily put additional strain on homeless service providers and crisis systems with any flux in prices or increased instability. This puts this issue as a high priority.

Issue 3: Barriers for Renter Households to Access Housing

3.1: Renter Households Face Higher Rates of Cost Burdens Statewide

Priority: High

Justification: Similar to low-income households, renters face higher rates of cost burdens. With greater levels of need for housing across the board, renters have less access to affordable housing opportunities and are considered a high priority.

Issue 4: Barriers for Seniors and Households with Disabilities to Access Housing

4.1: Senior Households and Households with Disabilities Face Increased Levels of Housing Need Statewide

Priority: High

Justification: As the senior population continues to grow, the level of housing need for this population is expected to increase. In addition, households with disabilities are expected to increase along with the aging population due to a higher rate of disabilities in older populations. With this increasing level of need, this issue is rated as a high priority.

Issue 5: Barriers to Providing Adequate Community Support

5.1: Lack of Resources

Priority: Medium

Justification: While the lack of resources is an important issue to ensure funding for the state and its residents, Commerce has little control over the amount of funding available. However, Commerce will continue to advocate for additional resources through Commerce leadership and the Executive Planning Process, as well as participation on the Governor's Housing Task Force. Commerce also engages in the biennium legislative process under the direction of the Governor's office. Commerce maintains this issue as a medium priority.

5.2: Lack of Federal-Level Data

Priority: Low

Justification: Commerce will continue to advocate for changes at the federal level for data collection. However, Commerce has little recourse to impact change at the federal level, and, therefore, makes this Fair Housing Issue a low priority.

5.3: Lack of Fair Housing Knowledge

Priority: High

Justification: The lack of fair housing knowledge statewide is pertinent to maintaining well-informed citizens and initiative-taking communities that promote good fair housing practices. It is well within the state's capacity to encourage fair housing outreach and education and is a high priority.

5.4: Institutional Barriers

Priority: Low

Justification: While more federal dollars are needed on American Indian reservations, Commerce is sometimes limited in its ability to invest by federal and/or tribal policies. Additionally, Commerce must direct resources where there is capacity for utilization. Many tribal and rural areas of the state have relatively less capacity for housing activities. Commerce is committed to navigating complex and overlapping policies and building capacity in underserved areas, but also faces its own capacity challenges and administers many programs that are already oversubscribed; as such, Commerce itemizes this Fair Housing Issue as a low priority.

5.5: State and Local Barriers

Priority: High

Justification: While Commerce does not expect to be able to change state tenant-landlord laws, it does hope to activate local communities in encouraging the development of affordable housing through more inclusive zoning and incentivization. Community MT currently provides planning grants to local communities to support efforts to increase local affordable housing options. In addition, Community MT works at the state level to initiate and adopt statewide reforms to encourage housing development and reduce barriers. This is a high priority.

COMMERCE

Fair Housing Goals

Fair Housing Goals are measured steps to address the Fair Housing Issues identified in this plan. These goals represent a collaboration between Commerce and the Department of Health & Human Services, as well as partnerships with outside agencies and organizations. In identifying these goals, Commerce is committing to affirmatively further fair housing in Montana through concerted efforts to reduce barriers to accessing housing, well-resourced areas, and economic opportunity. Commerce is committed to directing staff time, funding, and resources to address fair housing issues and leading efforts across the state to allow for more equitable access to housing and opportunities.

Goal	Strategy	Priority	Fair Housing Issue/s	Metric/s, Milestone/s, Timeframe	Responsible Party, Partners
1	Expand Fair Housing Outreach and Education	High	5.3 Lack of Fair Housing Knowledge	Within 1 year of publication, distribute the Fair Housing Equity Plan to stakeholders strategically and broadly. Information will be shared with repositories, all individuals and organizations subscribed to Commerce's Consolidated Plan and Equity Plan listserv, and at least 50 entities or individuals identified for direct outreach. In addition to meeting fair housing objectives, this effort will also meet identified Objectives, Goals, Strategies and Measures for Commerce.	Commerce, DPHHS
		High	5.3 Lack of Fair Housing Knowledge	Throughout the 2025-2029 Consolidated Plan period, partner with Montana Fair Housing to distribute and, if needed, collaborate to develop educational materials about fair housing rights and	Commerce, DPHHS, Montana Fair Housing

Goal	Strategy	Priority	Fair Housing Issue/s	Metric/s, Milestone/s, Timeframe	Responsible Party, Partners
				resources. Within 1 year of publication, identify educational materials needed. By the end of the 2025-2029 Consolidated Plan period, share materials with stakeholders in each of Montana's 56 counties. In addition to meeting fair housing objectives, this effort will also meet identified Objectives, Goals, Strategies and Measures for Commerce.	
		High	5.3 Lack of Fair Housing Knowledge, 5.5 State and Local Barriers	In alignment with applicable Department and State of Montana communication and legislative engagement policies and procedures, share the Fair Housing Equity Plan with stakeholders, including advocates and legislators, during the 2025 Legislative Session. Revisit the Fair Housing Equity Plan with stakeholders during the 2027 and 2029 Legislative Sessions to discuss progress made and persistent or new barriers encountered.	Commerce
2	Increase Fair Housing Coordination	High	1.1: Disproportionately Less Access to Mortgages for American Indian Applicants, 1.2: Disproportionately Higher Rates of Poverty for American Indians, 1.3: Lower Levels of Access to Community Assets for American Indians,	Within 2 years of publication, convene an interagency work group to assess equity needs and opportunities across the state. The work group may be newly formed or incorporated into existing and ongoing collaborative efforts. The work group will meet at least annually to consider housing barriers and solutions for renters, low and extremely low-	Commerce, DPHHS, Montana Fair Housing, Montana Human Rights Bureau, Community Leaders, Service Providers

Goal	Strategy	Priority	Fair Housing Issue/s	Metric/s, Milestone/s, Timeframe	Responsible Party, Partners
			1.4: R/ECAPs Occur in Communities with American Indian Poverty, 2.1: Higher Rates of Cost Burden for Low-Income Households, 3.1: Renter Households Face Higher Rates of Cost Burdens Statewide, 4.1: Senior Households and Households with Disabilities Face Increased Levels of Housing Need Statewide, 5.1: Lack of Resources, 5.4: Institutional Barriers, 5.5: State and Local Barriers	income households, residents with accessibility needs, Native American households, and households occupying R/ECAPs. The work group will also examine poverty strategy and identify underutilized or new resources for housing and community development.	
3	Reduce Barriers for Native American Households and Communities	High	1.1: Disproportionately Less Access to Mortgages for American Indian Applicants	Continue to partner with NeighborWorks Montana to support homebuyer education and do so with an increased emphasis on serving Native American communities during the 2025-2029 Consolidated Plan period.	Commerce, NeighborWorks Montana
		High	1.1: Disproportionately Less Access to Mortgages for American Indian Applicants	Continue to participate in the Montana Native Homeownership Coalition throughout the 2025-2029 Consolidated Plan period including participation in task force meetings.	Commerce, Montana Native Homeownership Coalition
		High	1.4: R/ECAPs Occur in Communities with American Indian Poverty	Provide targeted technical assistance to service providers and developers in R/ECAPs, increasing access to services and assets for Native American households. Montana's Fair Housing Equity Plan identifies four R/ECAPs:	Commerce, DPHHS

Goal	Strategy	Priority	Fair Housing Issue/s	Metric/s, Milestone/s, Timeframe	Responsible Party, Partners
				Glacier, Blaine, Rosebud, and Big Horn counties. One of these R/ECAPs will be selected for targeted support each year during the first 4 years of the 2025-2029 Consolidated Plan period. The State will aim to provide technical assistance to at least five key organizations in each county annually. In addition to meeting fair housing objectives, this effort will also meet identified Objectives, Goals, Strategies and Measures for Commerce.	
		Low	5.2 Lack of Federal-Level Data	Through existing mechanisms such as annual reporting to HUD over the 2025-2029 period, continue to call attention to existing information gaps at the federal level. Within the scope of the Consolidated Plan, note Native American data needs. Additionally, continue to engage with federal partners to share new resources as they become available, such as Fannie Mae's Native American Homeownership Journey (under development) and updates to the Minneapolis Federal Reserve Montana Dashboard (released July 2024 and to be updated based on public feedback).	Commerce, DPHHS
4	Support Housing and Community Development for Priority Areas and Populations	High	1.3: Lower Levels of Access to Community Assets for American Indians,	Prioritize funding for housing and community development that benefits disproportionately impacted or otherwise underserved populations and serves	Commerce

Goal	Strategy	Priority	Fair Housing Issue/s	Metric/s, Milestone/s, Timeframe	Responsible Party, Partners
			1.4: R/ECAPs Occur in Communities with American Indian Poverty, 4.1: Senior Households and Households with Disabilities Face Increased Levels of Housing Need Statewide	areas that are under-resourced or have high rates of poverty. Per the Fair Housing Equity Plan, this specifically includes projects in R/ECAPs and in Montana's rural communities, especially those with higher proportions of Native American residents. Based on public input, this also includes accessible projects benefiting seniors and households with disabilities. Commerce will measure progress under this goal by evaluating the change in investment for priority applicants year over year.	
5	Build the Capacity of Partners and Developers of Housing and Community Assets	Low	5.4 Institutional Barriers	Using existing and/or newly developed resources, create toolkits in support of housing and community development projects. Specific needs will be explored within 1-2 years of publication, and toolkits will be provided within 3 years of publication.	Commerce
		High	5.1: Lack of Resources, 5.5: State and Local Barriers	Continue to provide support broadly via the Community Technical Assistance Program, which offers professional planning assistance to communities across Montana. Also begin providing data to communities (within 1-2 years of publication) through the Community Planning Platform, which is currently under development. Investments in and a focus on planning may increase awareness of and access to available resources: state, federal and/or private.	Commerce

Goal	Strategy	Priority	Fair Housing Issue/s	Metric/s, Milestone/s, Timeframe	Responsible Party, Partners
6	Carryout Governor's Housing Task Force Recommendations	High	5.5: State and Local Barriers	Continue to engage with the Governor's Housing Task Force and, once drafted, assist to carryout recommendations to increase the supply of affordable and attainable housing for Montanans. The timeframe for specific initiatives to be undertaken will follow the task force's final report.	Commerce, Governor's Housing Task Force