

City of Great Falls 2015-2019 Consolidated Plan



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Executive Summary

ES-05 Executive Summary

1. Introduction

The City of Great Falls Consolidated Plan (Consolidated Plan or “ConPlan”) for the five year period from 2015 through 2019 received approval by the Great Falls City Commission on June 2, 2015 following a 30 day comment period extending from May 2, 2015 through May 31, 2015. City Commission action on the Consolidated Plan followed a plan development process which included the development of the Great Falls and Cascade County Comprehensive Housing Affordability Strategy 2010–2020 (CHAS) undertaken by a diverse community group; input from local organizations; and input from a public hearing on housing and community development needs on December 16, 2014, a Community Input agency meeting (needs assessment) on March 3, 2015, and a public hearing on the proposed Consolidated Plan and 2015/2016 Annual Action Plan May 19, 2015.

The purpose of the Consolidated Plan is to identify the housing and community development needs of low income people in the community and develop strategies for addressing those needs in a comprehensive, coordinated fashion using available federal and non-federal resources. The Consolidated Plan includes the one year Annual Action Plan for 2015/2016 which serves as the budget for the City of Great Falls 2015/2016 Community Development Block Grant (CDBG) Program and Home Investment Partnership Program (HOME). Specific projects recommended for the upcoming year are described in detail in the Consolidated Plan.

The Consolidated Plan is required for participation by the City of Great Falls in the U.S. Department of Housing and Urban Development (HUD) CDBG and HOME programs. The Consolidated Plan combines the planning and application requirements for the CDBG and HOME programs. Combining the submission requirements for these two programs, allows program planning and citizen participation to take place in a comprehensive context.

Seven priorities and related objectives are identified in the Consolidated Plan to meet the diverse needs of low income households in Great Falls. These needs were identified primarily through the process undertaken to develop the CHAS, including four separate community surveys, individual interviews, focus groups and working groups in 2009 and an additional two participatory meetings and an agency survey in early 2015. Census data and other published data were also reviewed to assist in identifying needs.

2. Summary of the objectives and outcomes identified in the Plan

The City of Great Falls identified seven (7) objectives or goals, as identified in the following table:

1	Goal Name	Public Improvements
	Goal Description	Provide public facility and infrastructure assistance including handicap accessibility and energy efficiency improvements to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. Other activities that will be funded will primarily address structural deficiencies and basic code upgrades for public facilities and non-profit agencies that serve the general population.
2	Goal Name	Transitional Housing
	Goal Description	Provide assistance for transitional housing with supportive services benefitting homeless or special needs persons. Over the next five years, the City of Great Falls will fund qualified projects to construct or rehabilitate transitional housing with supportive services for the homeless, homeless youth, young parents under the age of 18 years, homeless single head of household families who do not meet criteria for public housing, victims of abuse, and others.
3	Goal Name	Public Services
	Goal Description	Provide support to public service agencies operating programs that benefit low income persons. Over the next five years, the City of Great Falls will provide funds to social service agencies to fund scholarships for child and youth day care/recreational/educational programs, purchase food for elderly meal delivery programs and other activities for the provision of services to low income people.
4	Goal Name	Homeownership
	Goal Description	Provide direct first-time homebuyer assistance to low to moderate income families. Partner agencies have included NeighborWorks Great Falls and Habitat for Humanity using HOME and non-HOME funding.

5	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners or property owners with very low to moderate income renters to upgrade the city housing stock to meet standard building codes to provide and sustain safe, affordable housing. The City of Great Falls will provide loans to low income homeowners through the Deferred Payment Loan program. The City of Great Falls will provide loans to property owners to rehabilitate rental units that will be rented to low income people through the Rental Improvement program.
6	Goal Name	Fair Housing
	Goal Description	Provide affordable housing opportunities for very low and low income renters, particularly the elderly and/or disabled. The City of Great Falls will continue to provide non-profit, social service agencies CDBG funds to rehabilitate and subsidize rental housing for the elderly and/or disabled. Project-based rental assisted housing providers should apply for housing upgrades using CDBG dollars (through the Community Development Council) when available.
7	Goal Name	Economic Development
	Goal Description	Provide funding for projects which create decent paying jobs with benefits for persons from low to moderate income households. The City of Great Falls will fund economic development projects which will result in the creation of jobs for low to moderate income people. Such projects will include funding to the Great Falls Development Authority (GFDA) revolving loan fund to provide gap financing to existing and start-up businesses to create new jobs for low to moderate income people. For example, Economic Development was allocated 10% of CDBG dollars in FY 2015 and this allocation is predicted to continue through the next five years.

ES-05,AP-20 Goals

3. Evaluation of past performance

Objectives from the previous 2010-2015 Consolidated Plan for the City of Great Falls have been maintained or reinforced for use as goals in the new 2015-2019 plan. A needs assessment meeting that was attended by 25 nonprofit agency representatives on March 3, 2015 asked participants, goal by goal, which priorities should be emphasized, kept in place, or removed based on current housing (and non-housing) conditions. No items were removed, with extensive public comment providing support for stated goals. Refer to [Appendix D](#) for details.

The following is a listing of the priorities and the related objectives to address the priorities. All priorities were established based on high needs and none are higher than another.

Priority: Provide public facility and infrastructure assistance including handicap accessibility and energy efficiency improvements to provide a suitable living environment.

Priority: Provide assistance for transitional housing with supportive services benefiting homeless or special needs persons.

Priority: Provide support to public service agencies operating programs that benefit low income persons.

Priority: Provide direct first-time homebuyer assistance for low to moderate income families.

Priority: Provide construction and rehabilitation assistance for very low to moderate income homeowners or property owners with very low to moderate income renters to upgrade the city housing stock to provide and sustain safe, affordable housing (12-new construction or 14-rehabilitation)

Priority: Provide decent affordable housing opportunities for very low and low income renters, particularly the elderly and/or disabled.

Priority: Provide funding to projects which will create decent paying jobs with benefits for persons from low to moderate income households.

4. Summary of citizen participation process and consultation process

Buy-in with members of the community, with LMI residents as well as the nonprofit agency leaders who provide services to those residents, are critical to effective use of CDBG funds throughout the 2015-2019 five year period. Before the Consolidated planning process was underway, a Citizen Participation plan was created in January of 2013 to publish the purpose of the Consolidated Plan, CAPER, and a strategy for participation. This includes publishing in local newspapers, an explanation of the Community Development Council for the allocation of CDBG funding projects, and the use of email and traditional mail invitations to nonprofit agencies and faith-based organizations. A copy of the Citizen Participation Plan (2013) can be found in Appendix C of this document and online at <http://www.greatfallsmt.net/planning/citizen-participation-plan>.

Two public meetings were used to gather citizen participation in the creation of the Consolidated Plan draft and a final meeting to review the draft occurred on May 19, 2015 with no public comment. The comments and themes addressed in these meetings were transcribed and

attached to this document as Appendix D. Twenty five public agencies, nonprofit agencies, and faith-based representatives attended the March 13, 2015 Community Input meeting, along with the mailing of nearly 200 agency surveys to these same agencies; 15 responded either by mail or email after indicating they could not attend the meeting.

The Comprehensive Housing Affordability Strategy (CHAS) sent surveys to over 1,400 city and county residents, including the targeting of LMI households. This process involved agency questionnaires, opinion surveys, needs assessment, homeless survey, focus group findings, a collection of past housing efforts, and funding sources. Many of the views and opinions within this particular document, combined with more recent participatory events, formed the goals and objectives within the 2015-2019 Consolidated Plan. See [Appendix B](#) for this extensive participatory process.

5. Summary of public comments

A summary of public input sessions (Comprehensive Housing Affordability Strategy, Community Input meeting, etc) can be found in their respective Appendices.

No public comment was received during the draft 2015-2019 Consolidated Plan 30-day period, lasting from May 2-May 31, 2015, neither at the May 19 City Commission public nor via email/mail or telephone correspondence.

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

All public comments were noted, transcribed, or accepted into the Consolidated Plan where applicable.

7. Summary

The needs of the Great Falls community are greater than the funding provided from the entitlement community's CDBG funds or participating jurisdiction's HOME funds. Despite this, coordination of public and nonprofit leaders, as well as the added oversight provided by the Community Development Council, seeks to make the best use of these federal funds. The joint use of the Fair Housing Specialist by the City and Great Falls Housing Authority is an example of working together to solve needs indicated by the community; Great Falls is the only municipality in Montana with this position.

The Process

PR-05 Lead & Responsible Agencies

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	GREAT FALLS	Planning & Community Development
HOME Administrator	GREAT FALLS	Planning & Community Development

Table 1 – Responsible Agencies

Narrative

The Planning and Community Development Department is responsible for administering Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs within the City of Great Falls, Montana. A Consolidated Plan is required by U.S. Housing and Urban Development (HUD) in order to receive federal assistance annually. The City of Great Falls has received these funds as an entitlement community and participating jurisdiction, respectively. The City Commission reviews and approves the Consolidated Plan and will continue to do so in June 2015.

The City of Great Falls is seeking HUD approval for the 2015-2019 Consolidated Plan in June 2015 due to a granted one-month extension in the submittal date. This time was needed to allow for the required thirty (30) day public comment period and City Commission approval. This revised timetable also aligns more closely with PY 2016 for the city. The City program year begins July 1 and ends June 30.

Consolidated Plan Public Contact Information

On the web: <http://www.greatfallsmt.net/planning/community-development-block-grant-cdbg-and-home-investment-partnership-home-grant-programs>

Call: (406) 455-8407 or (406) 455-8435

Mail: P.O. Box 5021 | Great Falls, MT 59403

PR-10 Consultation

1. Introduction

Creation of the 2015-2019 Consolidated Plan was primarily authored by City of Great Falls Planning and Community Development department staff. Other City departments were heavily involved either in attendance/guidance for input meetings or available for consultation in updating current city projects (particularly the Great Falls Housing Authority). Nonprofit service agencies, affordable housing services, and housing developers were heavily involved in both the creation and fulfillment of past Consolidated Plan goals and objectives and are crucial to the further fulfillment of those goals for the next five-year period.

Sources of public data used in creating the plan include: U.S. Department of Housing and Urban Development (HUD User, CHAS, Office of Community Planning and Development), National Low Income Housing Coalition, Montana Department of Public Health and Human Services (2014 Montana Homeless Survey), Montana Human Rights Bureau (AI), and the U.S. Bureau of the Census. Individual interviews were used for updated information from partner agencies and all citizen participation meetings were documented as appendices with attendance. Other relevant planning or housing documents developed before the 2015-2019 Consolidated Plan are referenced later in PR-10 (Table 3).

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

From the 2013 Citizen Participation Plan, as posted publicly on the greatfallsmt.net website:

1. The City will contact local affordable housing and public service agencies, the Great Falls Housing Authority and the Neighborhood Councils to obtain information and comments to make citizens aware of the Consolidated Plan or Annual Action Plan process.

2. The proposed Consolidated Plan or Annual Action Plan will be available to all citizens on the City's internet site, at the Great Falls Public Library, and the City Planning & Community Development Department. Citizens will be informed about the availability of the proposed Consolidated Plan or Annual Action Plan by notifications on the City website, publishing display advertisements in the Great Falls Tribune and the Consumers Press and emailing notices to a wide variety of public service agencies. Notices will be emailed a second time to all agencies serving minorities and individuals with disabilities requesting they encourage their clients to participate. Notification will describe the availability of the plan and the 30 day period to receive public comment.

3. The City Commission will conduct two public hearings requesting input from citizens and representatives of low to moderate income level people as to the needs of the community,

including but not limited to housing, community development, infrastructure, economic development and homeless assistance. A second public hearing will be conducted to receive citizen comments on the proposed Consolidated Plan or Annual Action Plan.

The City will provide a reasonable number of free copies of the Consolidated Plan or Annual action Plan to citizens and groups upon request.

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

The Montana Continuum of Care Coalition (MT CoCC) was established by representatives of relevant geographies within the geographic state of Montana for the purpose of carrying out the duties of the CoCC program, as provided for in federal statute 24 CFR Part 578. Great Falls is within Region 5 of this statewide CoCC, and this Region is used to determine Homeless Survey data from the Montana Department of Health and Human Services. The last survey was held in January of 2015; however January 24, 2014 data is the most recent available in tabular format and publicly available online.

The City will help facilitate the local Continuum of Care for Homelessness (CoC) group. The CoC group meets regularly throughout the year to expand understanding of the services needed by those who are homeless, to facilitate consolidation and coordination of homeless services and to improve service delivery to homeless people. The City will facilitate the meetings. The CoC meetings provide a networking opportunity and assist in keeping funding options open for future HUD homeless grant funds. The most recent meeting addressed the 2015 Homeless Survey.

Transitional housing with supportive services is identified as the highest priority need for individuals and families who are homeless, as well as special populations such as teenagers, young parents, ex-felons, or people who have mental illness. To meet this need, the City will support development of transitional housing or other housing options for homeless people or people who are at risk of becoming homeless if applications made for CDBG/HOME funding fit established Strategic Plan goals. The CoC affirms transitional housing as a current priority need.

The City encourages application for federal homeless grant funds for projects assisting homeless people through the Montana Continuum of Care Coalition (MT CoCC) statewide application process. The MT CoCC is statewide which addresses homelessness issues and is the main vehicle for organizations in Montana to apply for federal homeless grant funds. Staff from Opportunities, Inc., (the local Human Resource Development Council) will be the local liaison with the MT CoCC. If local agencies pursue projects through the MT CoCC, the CoC will support all appropriate proposals. In addition, the City will encourage application for federal homeless grant funds for such projects through the MT CoCC statewide application process.

The City will also encourage the CoC to undertake activities which will move toward reaching the federal goal of ending chronic homelessness. Although no agencies in Great Falls other than Opportunities, Inc., have received any federal homeless grant funding for more than 11 years, the City will cooperate with the MT CoCC as much as possible to meet whatever requirements are established.

The CoC group will participate in the annual statewide housing status (homeless) survey which is undertaken to identify the number and demographics of homeless people in the state. The City will coordinate this survey.

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

ESG funds are not projected from the city PY 2016-2020.

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

Please see next page.

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	NEIGHBORWORKS GREAT FALLS
	Agency/Group/Organization Type	Services - Housing Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
2	Agency/Group/Organization	Rural Dynamics, Inc.
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
3	Agency/Group/Organization	GREAT FALLS DEVELOPMENT AUTHORITY
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
4	Agency/Group/Organization	QUALITY LIFE CONCEPTS
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
5	Agency/Group/Organization	MONTANA INSTITUTE OF FAMILY LIVING/PARK MANOR
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
6	Agency/Group/Organization	BIG BROTHERS BIG SISTERS OF GREAT FALLS
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
7	Agency/Group/Organization	GREAT FALLS AREA HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
8	Agency/Group/Organization	CITY PARK AND RECREATION - COMMUNITY RECREATION CENTER
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
9	Agency/Group/Organization	Great Falls College - MSU
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
10	Agency/Group/Organization	Great Falls Rescue Mission
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
11	Agency/Group/Organization	University of Great Falls
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
12	Agency/Group/Organization	Cascade City-County Health Department and Community Health Care Center, Inc
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs

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

The city attempted to contact local agencies not only through the 2010-2020 Comprehensive Housing Affordability Study (CHAS) undertaken several years but also through a publicly-posted December event that was published in the local paper (Great Falls Tribune) as well as the mail-invite Community Input Meeting for local nonprofit agencies. However the twenty-five attendees can not truly represent the entire spectrum of needs in the community.

Agencies were also contacted by Brendon Buckley of Johnson Economics, a consultant group hired by the City to conduct their own Market Analysis and assist with housing information on

the Great Falls region. Community response to housing needs will be a strong component of the contracted housing study, completed on May 8th, 2015.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Montana Continuum of Care Coalition	Housing Need Assessment
City of Great Falls Growth Policy Update	City of Great Falls	Dedicated Housing section informs needs for all four housing goals (fair and affordable, rental rehab, homeownership)
PHA 5-Year and Annual Plan	GFHA, U.S. Department of Housing and Urban Development	Quantifiable goals and objective for very low to low income needs; included public improvements (building sites), affordable housing
Great Falls Downtown Master Plan (2011)	City of Great Falls	Consists of census tracts qualifying as Low to Moderate Income areas, Housing Rehabilitation, affordable rental goals
Analysis of Impediments to Fair Housing Choice	City of Great Falls	Updated, included as 2015-2019 Analysis of Impediments (Appendix F), Fair Housing goal
Comprehensive Housing Affordability Strategy	City of Great Falls	Included as Appendix B, needs assessment for all goals as included in Strategic Plan

Table 3 – Other local / regional / federal planning efforts

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

The City of Great Falls works closely with state and county agencies in determining the needs of the region despite the relative isolation of Great Falls from adjacent municipalities. For example the community of Black Eagle is adjacent to the city limits but is found within the county jurisdiction, and the Malmstrom Air Force Base is adjacent but outside city limits. The Comprehensive Housing Affordability Strategy (CHAS) for 2010-2020 was conducted by a “Great Falls/Cascade County Housing Planning Group” to consider both city and county housing needs. See a full copy of this document in Appendix B.

Representatives from Malmstrom are regular attendees in the Housing Task Force monthly coordination meetings to discuss housing needs for airmen on and off base (within the city). City representatives from the Housing Authority, the Fair Housing Specialist, and Planning and Community Development staff all participate in these monthly events.

PR-15 Citizen Participation

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

In addition to a citizen participatory meeting on the evening of December 16, 2014, a Community Input Meeting was organized in March of 2015 to assess the needs of the nonprofit and faith-based agencies operating within the City of Great Falls. In addition to invitations sent through the mail, agencies were also provided with an agency questionnaire to assess the needs in their particular organization and how they are currently affirming fair housing (as described further in the Needs Assessment). Of the nearly 200 initiations sent, twenty five (25) agencies attended the event in-person and over a dozen (15) others who replied that they could not attend returned their surveys through email or mail.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
1	Public Meeting	Non-targeted/ broad community Non-profit agency personnel, faith-based institutions	The CDBG Community Input meeting was held on March 13, 2015 and attended by 25 persons from the Great Falls region, of which the majority was representatives of nonprofit organizations. Invitations were sent via mailings to area agencies and civic leaders (approximately 180 letters were sent)	The Community Input meeting invited participants to review the goals of the past 2010-2015 Consolidated Plan, suggest amending or adding to said goals, determining gaps in services provided to LMI individuals, and the general needs assessment of the community.	No comments were rejected.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
2	Public Hearing	Persons with disabilities Non-targeted/ broad community Residents of Public and Assisted Housing	The public hearing occurred on December 16, 2014 during a regularly scheduled City Commission meeting. Attendance was strong with members of nonprofit, housing and economic development agencies providing public comment.	15 individuals commented on community needs and proposed uses of CDBG funding during the public comment period. All comments were recorded in the minutes and attached in the URL.	No comments were rejected.
3	Public Hearing	Persons with disabilities Non-targeted/ broad community Residents of Public and Assisted Housing	The public hearing occurred on May 19, 2015 during a regularly scheduled City Commission meeting. While members of the public were in attendance for the meeting, no one spoke in support of or in opposition of this agenda item.	No one spoke in support of or in opposition.	No one spoke in support of or in opposition, thus no comments were rejected.

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The current needs assessment has been shaped by a number of planning documents and stakeholder interviews to shape the next five years in Great Falls. This includes the 2010-2020 Great Falls and Cascade County Comprehensive Housing Affordability Strategy (CHAS), which was included in the previous 2010-2015 Comprehensive Plan, as well as two (2) stakeholder meetings held in December 2014 and March 2015. These interviews developed new goals and housing needs as well as confirming that many needs found in 2010 are still relevant and necessary in the community for today and within the next five years covered in the Consolidated Plan.

Cascade County Comprehensive Housing Affordability Strategy (CHAS)

In September 2007, the City undertook a two and one-half year long process to incorporate extensive community involvement to identify and assess current housing and community development needs. This process included wide-ranging surveying, focus groups, individual and agency consultations, working groups and a full planning group effort which resulted in the 2010-2020 Great Falls and Cascade County Comprehensive Housing Affordability Strategy (CHAS). See a full copy of this document in [Appendix F](#). This planning process addressed community development needs beyond housing needs. The following are the 17 most significant housing needs as identified through the CHAS process.

1) Fair market rents are too low. The Great Falls Housing Authority and Opportunities, Inc., report Housing Choice voucher participants are having difficulties finding landlords that will accept vouchers. The primary problem is fair market rents are below the city market rents and in a strong rental market, landlords will rent to the open market for higher rents. A second problem is the landlord would have to hold the rental open until the Housing Quality Standards (HSQ) inspection was completed and compliance with HQS requirements achieved, meaning that rental income is lost during the transition. This waiting period, coupled with lower than market rent, results in landlords being reluctant to accept Housing Choice vouchers.

2) Transitional apartments for individuals and families ready to leave shelter care are lacking. Homeless families are now primarily housed in the Haven of Hope or the YWCA Mercy Home, while single males are housed at the Great Falls Rescue Mission. These organizations have identified a need for transitional apartments where families can live independently but with support services until they are ready to move to fully independent status.

3) *Supervised affordable housing for young parents is needed. Public housing and many private parties will no longer rent to teen parents because of the vagueness in Montana law concerning disaffirming contracts by persons under 18. Young parents are often unable to go to school, hold down a job to earn a living and care for a child.*

4) *Decent, safe one and two bedroom apartments are needed near the medical center, College of Technology (Great Falls College-Montana State University) and University of Great Falls. Students and persons needing or providing medical services have a very hard time finding affordable housing in those areas. Vacancies are immediately filled. Housing with less than a one year lease is needed for summer students and transitioning medical professionals.*

5) *More units of affordable accessible rental housing for seniors are needed. During the past decade a significant number of project-based affordable housing units have come out of contractual agreement with HUD to remain affordable. This fact, coupled with an ever increasing number of seniors—many of whom have low incomes—is creating an increased demand for one and two bedroom affordable senior rental units.*

6) *A lack of funds for rent and utility deposits keep individuals and families in emergency shelter longer than necessary. A deposit fund is needed to allow faster transition to independent living. This fund would also be helpful in integrating former criminal offenders into the community after their release.*

7) *Decent, affordable homes for first-time homebuyers continue to be needed. The average cost of safe and sanitary single family residences continues to be beyond the means of families with low to moderate incomes.*

8) *Land donations are needed to permanently create housing that is affordable in the form of land trusts.*

9) *Downtown redevelopment hinges on the need for middle income housing stock in the downtown area.*

10) *An expedited zoning process or special zoning ordinance is needed to encourage development of affordable housing.*

11) *Local non-profit developers need to utilize the Low Income Housing Tax Credit program to augment affordable rental housing stock, especially units affordable to households or individuals at 50% of area median income.*

12) *The need for deferred loans for single family home improvement by lower income homeowners continues.*

13) *Additional Medicaid waivers are needed for the growing number of disabled and elderly people. More housing providing assisted living units that will accept the waivers is needed.*

14) Facilities are needed that combine affordable senior housing and the use of in-home services. This is a lower cost alternative than assisted living or a nursing home, and is similar to allowing seniors to stay in their homes while receiving in-home care.

15) A housing ombudsman is needed to help renters negotiate rental application rejections.

16) A better quality of rental housing stock available to those receiving Housing Choice vouchers is needed.

17) Preservation and upgrading of existing manufactured housing communities is needed to preserve housing for lower income families.

December 2014 CDBG Community Needs Meeting

The December 16th event was published in the local newspaper, the Great Falls Tribune, one week prior and openly encouraged the public to participate. Both CDBG and HOME considerations were open for discussion including their current performance by the city and proposed uses of future grant funds. The event was advertised as handicap accessible and encouraged written comments to the CDBG/HOME Administrator if any interested citizens were unable to attend. Low to Moderate Income persons were the primary concern of the needs assessment, although comments promoting economic development were also considered.

March 2015 CDBG Consolidated Plan Community Meeting (agency meeting)

The March 13th meeting was attended by 25 nonprofit and faith-based agency leaders in a roundtable discussion organized by the Planning and Community Development Department. The event was largely informal but divided into three discussions about: adding or subtracting needs from the 2010-2020 CHAS, determining additional needs in the community (in general, rather than according to services that local government provides) and a discussion of current strengths and weaknesses in the current agency services provided, including gaps in service. A large notepad was used to write in real time attendees comments and concerns for each discussion; this notepad was transcribed and it attach to this Consolidated Plan as Appendix D.

New comments from this assessment not previously in the CHAS:

1) Planning for recent (post-recession) growth: need for all kinds of jobs, rather than settling for just “decent” jobs. This is closely connected to entry-level housing and “workforce housing”

2) Need for greater communication among agencies in Great Falls as well as to those in need. Nonprofits need to refer LMI residents to other local agencies for all of their needs; a “clearinghouse” of local information was suggested

3) Suggestion of a more active city role (proactive rather than reactive) to address absentee landlord housing conditions, code enforcement

NA-10 Housing Needs Assessment

Summary of Housing Needs

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	56,690	58,207	3%
Households	23,811	24,566	3%
Median Income	\$32,436.00	\$42,540.00	31%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	3,030	2,855	4,425	2,620	11,635
Small Family Households *	1,105	810	1,375	940	6,150
Large Family Households *	100	135	205	230	730
Household contains at least one person 62-74 years of age	385	425	955	485	2,270
Household contains at least one person age 75 or older	340	750	865	435	915
Households with one or more children 6 years old or younger *	775	445	500	445	810
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Data Source: 2007-2011 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	70	50	10	45	175	10	0	10	40	60
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	105	15	0	30	150	4	0	0	15	19
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	40	35	25	0	100	10	0	0	4	14
Housing cost burden greater than 50% of income (and none of the above problems)	990	365	60	0	1,415	475	230	275	15	995

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	425	675	310	30	1,440	195	350	810	400	1,755
Zero/negative Income (and none of the above problems)	230	0	0	0	230	25	0	0	0	25

Table 7 – Housing Problems Table

Data 2007-2011 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,205	460	100	75	1,840	500	230	290	80	1,100
Having none of four housing problems	790	1,195	1,665	750	4,400	285	970	2,375	1,720	5,350
Household has negative income, but none of the other housing problems	230	0	0	0	230	25	0	0	0	25

Table 8 – Housing Problems 2

Data 2007-2011 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	590	350	155	1,095	200	200	515	915
Large Related	45	50	25	120	40	65	90	195
Elderly	295	269	84	648	200	210	275	685
Other	635	425	115	1,175	245	110	210	565
Total need by income	1,565	1,094	379	3,038	685	585	1,090	2,360

Table 9 – Cost Burden > 30%

Data 2007-2011 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	355	85	15	455	135	100	105	340
Large Related	30	0	0	30	40	65	35	140
Elderly	225	90	45	360	110	25	65	200
Other	515	200	0	715	200	40	75	315
Total need by income	1,125	375	60	1,560	485	230	280	995

Table 10 – Cost Burden > 50%

Data 2007-2011 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	145	50	25	30	250	0	0	0	15	15

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	0	0	0	0	0	14	0	0	4	18
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	145	50	25	30	250	14	0	0	19	33

Table 11 – Crowding Information – 1/2

Data 2007-2011 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

According to the 2010 Census 40.2% of households in Great Falls are classified as nonfamily households. Of this percentage 33.5% live alone. Under [Table 9](#) and [Table 10](#) cost burdens for the designated category Other are likely similar to single person households. These tables indicate Other accounts for 45% of severe cost burdens and 38% of cost burdens for renters.

Community input meetings as well as applications for CDBD-funded programs in FY 2015 indicated the need for one-bedroom apartments, especially housing for low-income senior citizens. Thus the City of Great Falls sees rentals for the elderly as an increasingly important component of its Consolidated Plan, whether from independent living in single-family housing (commonly referred to as aging in place) or through multi-family senior housing facilities assisted with HUD rent controls. The Elderly category on [Table 9](#) and [Table 10](#) account for an additional 23% and 21% of cost burdens respectively.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Park Manor, an elderly/handicapped subsidized apartment building operated by in the Montana Institute of Family Living in the downtown area, is seeing a trend away from housing the elderly

to housing those who have a physical disability. Currently, 100% (from 85% in 2009) of their residents have a disability, including elderly residents. Park Manor has a total of 103 units, all of which are Section 8 assisted living units.

The YWCA Mercy Home, the primary provider of emergency/transitional housing and supportive services for victims of domestic abuse, has the capacity to house 30 women & children at one time; supportive services include crisis intervention, support groups, information and referral, group counseling, personal advocacy, parenting classes, 911 cell phone lending program, transportation, legal advocacy, resume building & employment coaching. This agency reports an ongoing trend of women seeking housing services for a longer period of time where they will be safe from previous abusive relationships. The Mercy Home was designed to be emergency shelter and is not adequately designed for transitional housing. The YWCA also reports serving more victims who are not eligible for public housing until they pay past due balances which are often caused by abusive partners. Along with housing assistance, victims of domestic violence may require financial assistance for basic needs, counseling, legal assistance and training/education to assist with employment.

Increasing housing prices and rents make it difficult for single-parent households to purchase or rent safe, affordable housing. Most single-parent households are classified as low or very low income. NWGF reports a large proportion of the low income people they serve are single parent heads of household. Affordable housing options are available, however, these units are primarily of substandard condition, unsafe or not energy efficient so utility costs are prohibitive. Therefore, subsidized housing that is in decent condition is needed.

A future multi-story shelter for families is currently under construction (adjacent to existing men's and women's shelters) operated by the Great Falls Rescue Mission. This will prevent families, especially children, from being separated while finding shelter or attempting transitional housing. It is anticipated to open in 2016 and is largely dependent on donations for the cost of construction.

What are the most common housing problems?

A review of findings from the 1,496 surveys which were returned from an opinion survey undertaken as part of the CHAS process revealed the following significant housing problems and needs:

- Inadequate insulation
- air leaks around windows and doors
- sticking doors and windows
- need to demolish vacant deteriorating buildings, houses and trailers
- need grants and low-interest loans to support first time homebuyers
- support seeking state or federal funds to make improvements or expand affordable housing opportunities

Of the 1,348 responses to the survey question about the area's biggest housing problem, the following was found:

- no problem – 310
- poor quality housing – 242
- lack of affordable housing – 226
- lack of low income housing – 99
- new homes too expensive – 77
- rent too high – 60

Are any populations/household types more affected than others by these problems?

Nearly two-thirds of residents with 0-30% of Area Median Income have one or more severe housing problems at a rate of 65%. Over one-third (38.7%) of renters are cost burdened and paying over 30% on housing. Elderly homeowners face a larger cost burden than elderly renters, with 29% of owners paying over 30% on housing while renters are estimated at 21%.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Of the 113 individuals who responded to the 2009 survey questionnaire:

18% were single parents with children, 5% were with a spouse or partner and children

Updating that information, the 2014 Montana Homeless Survey Analysis Tool found 51 respondents with family and 171 respondents with accompanying children in school. Of the 1299 total respondents, this equates to 4% of responses with family and 13.2% of respondents accompanying children in District 5 – Great Falls (mthomeless.org/2014).

The Great Falls Public School District has hired a homeless student coordinator who has begun participating in the COC group so information about the number of homeless students and their associated needs should be available in the future. The coordinator reported as of April 2010 there were 145 homeless students in the public schools. One of the focus group of the CHAS reported there are nine chronically homeless students attending the alternative high school and seven chronically homeless students at the two regular high schools. An additional estimated 10% to 15% of the alternative high school population may be doubling up. Several agencies have noted there is a significant number of youth who need housing and transportation assistance so they can attend school.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

According to 2014 Homeless Survey results, 1,035 in District 5 of the Montana Continuum of Care (Great Falls) were at risk of being homeless on the night of January 26th, 2014. 1,299 surveys were completed. This can be further explained by differentiating at-risk of being homeless (such as being located in treatment facilities, jail, or “couch surfing”) versus the HUD definition of homeless (emergency shelters, hotel vouchers, or outside or other place not meant for sleeping). Only 264 meet the definition of homeless while the remaining 1,035 (80%) remain at risk.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The number one concern found by respondents of surveys and interviews are the lack of decent, affordable rental (and ownership) housing options and the combination of low wages and low fair market rents. The median household income has increased over \$10,000 over the past ten years (31%).

The basic housing affordability problem for many residents is the disparity between income levels and housing costs, especially for low and moderate income people. Average housing prices have grown faster than income levels, making it difficult or impossible for many families to save enough for a down payment or to afford the monthly cost of a mortgage, interest, insurance and taxes. This problem is worse for people with poor credit histories, especially those people with low and moderate incomes.

Housing that is considered affordable is defined as housing units that have sales prices or rents that are within the means of a low or moderate income household. The private housing market does not generally provide affordable housing without some type of subsidy or incentive. Public agencies and non-profit organizations have been very active in housing programs for many years, as described elsewhere in this report. Despite their success, however, the ability of low and moderate income families to acquire housing has still been adversely affected as a result of costs rising faster than incomes.

Another problem related to housing affordability is a shortage of quality houses in certain price ranges. Housing units that may be affordable to residents within certain income groups often have physical problems that make the units ineligible for financing from private lending institutions, as well as unattractive to potential buyers. In other cases, the houses may be in good enough condition to qualify for a loan but the unit is priced too high for low or moderate income potential buyers to afford.

NA-15 Disproportionately Greater Need: Housing Problems

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The City of Great Falls is over 87.5% White according to the 2011-2013 ACS. Other races account for around 5% or less for nonwhite races, with American Indian or Alaska Native amounting to the second largest percentage at 5.4%. Asian is 1% and Black or African American is less than 1%. Hispanic or Latino of any race amounts for 4.3%

Based upon the tables below, calculation has found that disproportionately greater needs to exist among certain racial or ethnic groups based on housing problems despite their small percentage of the population. Disproportionately greater need is defined by being at least 10% larger than the total income level (all races combined).

For 0%-30% AMI:

- **76.7%** of extremely low income residents have one or more of the four housing problems provided, but all ten (**100%**) of Asian residents in this AMI range suffer from one or more housing problems.

For 30%-50% AMI:

- **60.2%** of low income residents have one or more of the four housing problems provided, but **75%** of Native American and nearly **93%** of Hispanic residents suffer from one or more housing problems.

For 50%-80% AMI:

- **51.5%** of moderate income residents has one or more of the four housing problems provided, but **71.4%** of Hispanic residents suffer from one or more housing problems

For 80%-100% AMI:

- **22.1%** of residents have one or more of the four housing problems provided, but **41.1%** of Hispanic residents suffer from one or more housing problems

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,325	455	250
White	1,965	380	150
Black / African American	0	35	0
Asian	10	0	0
American Indian, Alaska Native	180	15	85
Pacific Islander	0	0	0
Hispanic	50	15	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,720	1,135	0
White	1,495	1,020	0
Black / African American	0	55	0
Asian	0	0	0
American Indian, Alaska Native	135	45	0
Pacific Islander	0	0	0
Hispanic	50	4	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,505	2,920	0
White	1,365	2,590	0
Black / African American	0	75	0
Asian	0	15	0
American Indian, Alaska Native	90	165	0
Pacific Islander	0	0	0
Hispanic	50	20	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	580	2,040	0
White	545	1,805	0
Black / African American	0	25	0
Asian	0	10	0
American Indian, Alaska Native	0	85	0
Pacific Islander	0	0	0
Hispanic	35	50	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

NA-20 Disproportionately Greater Need: Severe Housing Problems

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Based upon the tables below, calculation has found that disproportionately greater needs to exist among certain racial or ethnic groups based on housing problems despite their small percentage of the population. Disproportionately greater need is defined by being at least 10% larger than the total income level (all races combined).

For 0%-30% AMI:

- **60.1%** of extremely low income residents have one or more of the four housing problems provided, but all ten (**100%**) of Asian residents suffer from one or more housing problems.

For 30%-50% AMI:

- **24.2%** of low income residents have one or more of the four housing problems provided, but nearly **72.4%** of Hispanic residents suffer from one or more housing problems.

For 50%-80% AMI:

- No disproportionately greater need found

For 80%-100% AMI:

- Only **5.7%** of residents has one or more of the four housing problems provided, but **35.3%** of Hispanic residents suffer from one or more housing problems

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,705	1,075	250
White	1,475	865	150
Black / African American	0	35	0
Asian	10	0	0
American Indian, Alaska Native	120	80	85

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	0	0
Hispanic	40	25	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	690	2,165	0
White	625	1,890	0
Black / African American	0	55	0
Asian	0	0	0
American Indian, Alaska Native	15	160	0
Pacific Islander	0	0	0
Hispanic	40	15	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	385	4,040	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	360	3,595	0
Black / African American	0	75	0
Asian	0	15	0
American Indian, Alaska Native	20	235	0
Pacific Islander	0	0	0
Hispanic	4	60	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	150	2,470	0
White	120	2,230	0
Black / African American	0	25	0
Asian	0	10	0
American Indian, Alaska Native	0	85	0
Pacific Islander	0	0	0
Hispanic	30	55	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

NA-25 Disproportionately Greater Need: Housing Cost Burdens

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

The table below (once correcting the numbers for “Jurisdiction as a whole”) indicates that a high number (73.2%) are not cost burdened based on the data. The remaining 26.8 percent of Great Falls households are cost-burdened, meaning that they pay over 30% of their income on housing needs. 15.8% of cost burdened residents pay between 30-50% of their income while the other 11% pay greater than 50% of their income on housing (extremely cost burdened).

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	6,815	3,270	2,560	285
White	16,205	3,410	2,445	185
Black / African American	275	0	0	0
Asian	100	0	10	0
American Indian, Alaska Native	520	265	80	85
Pacific Islander	0	0	0	0
Hispanic	275	60	85	0

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2007-2011 CHAS

Discussion:

NA-30 Disproportionately Greater Need: Discussion

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Based upon the data provided under form NA-20, calculation has found that disproportionately greater needs do exist among certain racial or ethnic groups based on housing problems despite their small percentage of the population. Disproportionately greater need is defined by being at least 10% larger than the total income level (all races combined).

For 0%-30% AMI:

- **60.1%** of extremely low income residents have one or more of the four housing problems provided, but all ten (**100%**) of Asian residents suffer from one or more housing problems.

For 30%-50% AMI:

- **24.2%** of low income residents have one or more of the four housing problems provided, but nearly **72.4%** of Hispanic residents suffer from one or more housing problems.

For 50%-80% AMI:

- No disproportionately greater need

For 80%-100% AMI:

- Only **5.7%** of residents has one or more of the four housing problems provided, but **35.3%** of Hispanic residents suffer from one or more housing problems

If they have needs not identified above, what are those needs?

Great Falls has not specified or determined any targeted needs based on race outside of the findings above.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

A review of the CPD Maps provided by HUD reveals that there are several concentrations of minority races in Great Falls: American Indians are located in all census tracts with the highest concentrations in tracts 2 3, 8, 9, and 107; persons of Hispanic Origin in all census tracts with the highest concentration in tracts 4, 9, 12, 106 and 107. Note that tract 107 consists primarily of county land: only the Great Falls International Airport is located within city limits. Please note

that Malmstrom Air Force Base is located in Tract 12 resulting in a high concentration of all races (See images attached to NA-30).

NA-35 Public Housing

Introduction

Only one Public Housing Authority exists within the city of Great Falls: the Great Falls Housing Authority. The GFHA was designated by HUD as a high performing public housing authority yearly through 2009 based on the Public Housing Management Assessment Program. In reviewing the Section 504 needs assessment, the GFHA is in compliance with the physical handicapped accessibility requirement for housing authority facilities. The GFHA will take into account the handicap accessibility requirements (5% rule) during any rehabilitation projects. It has housing designated for the elderly/disabled and has established partnerships with assistive agencies within the community to assist those residents.

The Great Falls Housing Authority will encourage tenants to be involved in the management of public housing through having two tenants on the Housing Authority Board of Commissioners. It writes and distributes a quarterly newsletter and hosts public hearings to obtain input from residents as to their needs and opinions, including those related to the annual plan and proposed rehabilitation of housing units. The information obtained from hearings will be considered in the annual grant applicant.

The GFHA is governed by a seven-member Board of Commissioners appointed by the Great Falls City Commission. The community members of the Board serve five-year terms and the resident members serve two-year terms. All members serve without compensation. The Board contracts for staff and management services from the city.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	469	184	0	183	0	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	11,976	12,647	0	12,602	0	0
Average length of stay	0	0	3	3	0	3	0	0
Average Household size	0	0	2	2	0	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	61	31	0	31	0	0
# of Disabled Families	0	0	109	63	0	63	0	0
# of Families requesting accessibility features	0	0	469	184	0	183	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	369	149	0	149	0	0	0
Black/African American	0	0	14	8	0	7	0	0	0
Asian	0	0	6	0	0	0	0	0	0
American Indian/Alaska Native	0	0	77	26	0	26	0	0	0
Pacific Islander	0	0	3	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	11	5	0	5	0	0	0
Not Hispanic	0	0	458	179	0	178	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Great Falls Housing Authority has been designated by HUD as a high performing public housing authority each year since 2004 based on the Public Housing Management Assessment Program. The Great Falls Housing Authority will continue the processes it has in place to improve the living environment for its residents, including using capital funds to rehabilitate housing units as necessary. A rehabilitation project continuing through the upcoming five years is infrastructure upgrading and major renovation of 156 units at the main housing site.

In reviewing the Section 504 needs assessment, the Great Falls Housing Authority is in compliance with the physical handicapped accessibility requirement for housing authority facilities. The Great Falls Housing Authority will take into account the handicap accessibility requirements (5% rule) during any rehabilitation projects. The Great Falls Housing Authority has housing designated for the elderly/disabled and has established partnerships with assistive agencies within the community to assist those residents.

The Great Falls Housing Authority will encourage tenants to be involved in the management of public housing through having two tenants on the Housing Authority Board of Commissioners. The Great Falls Housing Authority will write and distribute a quarterly newsletter and host public hearings to obtain input from residents as to their needs and opinions, including those related to the annual plan and proposed rehabilitation of housing units. The information obtained from hearings will be considered in the annual grant applicant.

The Great Falls Housing Authority will work with NWGF and Habitat for Humanity to encourage residents to undertake the necessary steps to make the transition from renters to homeowners, if appropriate. The Great Falls Housing Authority has contracted with the Great Falls Police Department for more than two decades for an on-site community police officer. The programs involved with this service encourage public housing residents to become involved in their community and address problems in their neighborhood. The Great Falls Housing Authority will continue this service as long as funding is available. The Great Falls Housing Authority will coordinate with the Boys & Girls Club of Cascade County to provide a wide variety of services for resident youth and will provide numerous scholarships.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

From the Analysis of Impediments (2015): Fair market rents are too low. The Great Falls Housing Authority and Opportunities, Inc., report Housing Choice voucher participants are having difficulties finding landlords that will accept vouchers. The primary problem is fair market rents are below the city market rents and in a strong rental market, landlords will rent to the open market for higher rents. A second problem is the landlord would have to hold the rental open until the Housing Quality Standards (HSQ) inspection was completed and compliance with HQS requirements achieved, meaning that rental income is lost during the transition. This

waiting period, coupled with lower than market rent, results in landlords being reluctant to accept Housing Choice vouchers.

How do these needs compare to the housing needs of the population at large

Decent, affordable housing for the City was re-emphasized by two citizen participation meetings held in December 2014 and March 2015. One of the primary needs expressed by participants and a goal of the 2010-2015 Consolidated Plan, need for one-bedroom apartments, applies to both attraction of young professionals, workforce housing, and independent living for the disabled and/or elderly.

The decrease in public funding for nonprofit partner agencies (and CDBG programming also provided to these agencies) affects all housing organizations in the community. This creates a housing burden on those depending on these agencies as well as impacting those recently affected by the combination of rising housing costs, low inventory of high-quality rental units, and a discrepancy between salaries in the Great Falls region and the cost of housing.

NA-40 Homeless Needs Assessment

Introduction:

On the night of January 24, 2014, 1,319 people were counted as homeless or at risk of homeless in Great Falls. Of those included, 507 were counted as individuals, 187 respondents with family, 387 accompanying persons, and 238 (accompanying) children. Categories such as jail prison or detention center are counted as at risk because they may become homeless upon release, whereas those counted as outside or in others places not meant for sleeping are more clearly defined.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	496	500	0	0	0
Persons in Households with Only Adults	0	497	500	0	0	0
Chronically Homeless Individuals	0	214	225	0	0	0
Chronically Homeless Families	0	47	50	0	0	0
Veterans	0	106	100	0	0	0
Unaccompanied Child	0	9	10	0	0	0
Persons with HIV	0	16	20	0	0	0

Table 26 - Homeless Needs Assessment

Episodes of Homelessness				
Length of Homelessness	Individuals	Family Head	Accompanying Persons	Children
Once	8	3	2	2
Twice	18	4	7	6
Three times	12	2	7	5
Four or more times	5	2	7	3
Missing or N/A	13	0	0	0
Total	56	11	23	16

Length of Homelessness				
Length of Homelessness	Individuals	Family Head	Accompanying Persons	Children
One week or less	153	94	114	73
From one week to one month	52	10	34	27
More than one month	56	9	30	23
More than three months	40	12	39	21
More than six months	54	20	66	47
More than one year	36	18	44	22
More than two years	90	14	24	13
Missing or N/A	26	10	16	12
Total	507	187	367	238

Episodes, Length of Homelessness

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Length of Homelessness, Military Veterans				
Length of Homelessness	Individuals	Family Head	Accompanying Persons	Children
One week or less	11	5	7	5
From one week to one month	6	0	0	0
More than one month	7	0	0	0
More than three months	1	1	2	2
More than six months	6	2	8	7
More than one year	3	2	6	2
More than two years	16	0	0	0
Missing or N/A	6	1	0	0
Total	56	11	23	16

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Homeless Race or Ethnicity				
Ethnicity	Individuals	Family Head	Accompanying Persons	Children
White	154	38	104	66
Hispanic/Latino	19	1	18	7
Amer. Indian	298	140	234	163
Black/Afr. Amer.	8	2	7	2
Asian	5	0	0	0
Native Hawaiian	10	2	4	0
Other	0	0	0	0

Extent of Homelessness by Race, Veterans

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Chronically homeless, as defined by HUD meaning an individual or family with a disabling condition who has been continuously homeless for a year or more or has had at least four episodes of homelessness in the past three years, is prevalent in Great Falls. 2014 Montana Homeless Survey estimated over 200 sheltered individuals who have recorded being homeless for over a year, and nearly 50 homeless families. Veteran homelessness was recorded at over 100 (106) for District 5, Great Falls. Great Falls maintains a strong military presence by being adjacent to Malmstrom Air Force Base.

The number of homeless families with children is high, with demand requiring the construction of a new family facility by the Great Falls Rescue Mission that holds an additional two floors of beds (under construction in 2015). While the number of unaccompanied youth is undefined, other family service agencies report receiving children from family members due to methamphetamine use by one or more parents.

Nature and Extent of Homelessness:

Race:	Sheltered:	Unsheltered (optional)
White	362	0
Black or African American	19	0
Asian	5	0
American Indian or Alaska Native	835	0
Pacific Islander	16	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	45	0
Not Hispanic	1,237	0

Data Source

Comments:

Montana Department of Health and Human Services 2014 Montana Homeless Survey Analysis Tool

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

On the night of January 24, 2014, 1,319 people were counted as homeless or at risk of homeless in Great Falls. Of those included, 507 were counted as individuals, 187 respondents with family, 387 accompanying persons, and 238 (accompanying) children.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The stand-out figure coming from the 2014 count of homelessness is the prevalence of American Indian or Alaskan Natives when categorized by race. Over two-thirds of those counted on January 24, 2014 were categorized as such despite accounting for less than 6% of the overall racial composition in Great Falls. The City serves as the social services hub of all of North Central Montana and the surrounding Cascade County jurisdiction contains larger American Indian or Alaskan Native populations than the city limits. Populations of surrounding municipalities are served by homeless providers in Great Falls and have access to public transportation within a city block of Great Falls Rescue Mission properties.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Only 12% of respondents indicated that they slept in an unsheltered location on the night of January 26th 2014. Unsheltered was interpreted as outside or other place not meant for sleeping (e.g. on the street under a bridge in a park car bus station abandoned building etc.). The remaining 88% of respondents reported various locations, the most common being with family/friends either on an emergency basis or for a long duration, in their own apartment for that night, or in an Emergency Shelter found within the city.

NA-45 Non-Homeless Special Needs Assessment

Introduction:

Non-homeless special needs include populations of the elderly, mentally, developmentally, or physically disabled, those dependant on alcohol and drugs, victims of domestic violence, persons with HIV/AIDS, at risk youth, home care services and employment services.

Describe the characteristics of special needs populations in your community:

Although it is difficult to identify the precise number of people who have special needs, data from the 2009-2013 ACS update reflects 8,791 individuals age five years and older with a disability reside in Great Falls. Although more specific Census data is not available for Great Falls, 2011-2013 ACS data for Cascade County indicate there are 6,049 people who are 16 years or older with outside-home/self-care disabilities and 11,453 disabled persons age five years and older with sensory/physical/mental disabilities (persons can have more than one disability). It is of note that of the 1,299 individuals who responded to a community opinion survey question about limitations, 320 people indicated they are limited in some way because of physical, mental or emotional problems.

The current (2015) waiting list for public housing includes 23 families with disabilities. The current waiting list for Housing Choice vouchers through the Great Falls Housing Authority includes 19 families with disabilities.

Medicaid Waivers are administered by Easter Seals-Goodwill Industries and Area VIII Agency on Aging.

The search for affordable housing is complicated for individuals facing serious disabilities or other special situations. Both the public and government agencies have become increasingly aware of the need to work with the private sector and non-profit organizations to develop viable housing options for people with special needs, including the elderly, disabled, homeless and single female-headed households. An important component of successfully addressing housing needs is integrating low income and special needs housing units into the community. In addition, people with disabilities or who have other special needs require supportive services concurrent with housing assistance.

As described previously, extensive community-wide surveying was done through the CHAS process to determine community needs. Results of the 1,496 surveys which were returned from an opinion survey indicated the following significant needs as related to the special needs population:

- more housing for people with physical or mental disabilities
- more permanent housing opportunities for teen parents who are pursuing schooling and caring for children
- more permanent housing opportunities for victims of violence
- more apartments for the elderly
- more housing options for low income elderly more group homes for people who are mentally ill, developmentally disabled, adult foster care, youth foster care, runaway youth and at risk youth
- more personal care facilities
- more nursing home space

People with Mental Disabilities

The population in Great Falls with special housing needs includes people with various forms of mental illness. Using data from the 2011-2013 American Community Survey, there are listed an estimated 3,621 people in Great Falls who are classified as having cognitive difficulty. Cognitive disability does not imply mental illness.

As described previously, the main programs to assist this group of residents are administered by the Center for Mental Health (CMH). This agency provides one Housing Choice Voucher for independent living, four separate group homes (32 total beds) for adults with SDMI and nine additional beds of adult foster care for adults with SDMI. In addition to the housing services described in the Homeless Facilities and Services section, the CMH provides comprehensive community-based mental health services including psychiatric assessment and treatment; medication monitoring; individual, group and family therapy; day treatment; crisis intervention; and supportive services such as housing assistance, case management, supported employment and recreational activities.

There is a significant need for more transitional housing to serve this population, as well as permanent housing (affordable rental units). The CMH provides seven units of transitional housing and five group home beds at Center West, a short-term transitional housing facility for adults with severe disabling mental illness. This facility will house people leaving the state hospital or group homes and/or disabled veterans to help them transition into community living. American Recovery and Reinvestment Act funds were used in part on this project and seven permanent jobs were created.

The focus group of the CHAS which addressed housing for people with disabilities reported that only one of the four group homes operated by the CMH which serve mentally disabled people are accessible to physically disabled clients. The Mental Health Association of Great Falls reports a number of people with mental illness live in sub-standard conditions because they have criminal records and are viewed as undesirable tenants. The following needs were identified by the focus group:

- dental care
- mental health outreach services to assist people with finding rental housing
- emergency shelter and transitional housing in a setting that understands the needs of mentally ill homeless person
- subsidized housing units for seriously mental ill people

Physically Disabled People

Based on data from the 2011-2013 ACS, there are 8,781 people in Great Falls age of all ages with a physical disability. This accounts for 15.4% of the population.

Accessible Space, Inc., developed and manages two accessible, subsidized apartment complexes which have a total of 40 units for mobility impaired/brain injured adults. 23 units for low income adults with severe mobility impairments and/or traumatic brain injuries are provided at Southwinds Estates and 17 units at Meadow Lark Apartments. The occupancy rate at Meadow Lark Apartments was 100%, with a waiting list of 45 applicants for one bedroom units and five applicants for two bedroom units. Twenty-four hour personal care attendant services will be provided or available at both housing complexes. ASI will also provide 47 units of accessible housing with availability of personal care attendant services for low income elderly at The Portage.

Park Manor, an elderly/handicapped subsidized apartment building operated by in the Montana Institute of Family Living in the downtown area, is seeing a trend away from housing the elderly to housing those who have a physical disability. In 2010, 85% of their residents have a physical disability. In 2015, management indicated all (100%) residents were physically disabled; all seniors in residence were physically disabled.

Small focus groups were held from October 2008 through April 2009 to determine the extent and character of the needs identified through the surveys undertaken as part of the CHAS process. A focus group noted the agency staff helping people with disabilities who are seeking accessible housing do not have a process in place to interact with providers and therefore a gap exists between providers and people who need the service. This lack of communication between agencies and those seeking their services is noted as Impediment #6 in the Analysis of Impediments for Fair Housing. Identifying the inventory of accessible housing and establishing an electronic network for providers to report current vacancies to potential clients looking for accessible housing is needed.

Other needs noted in the CHAS are for new homes and rental property to be built to minimum visit ability standards and the need for more flexibility in use of emergency funds, including rental deposits and first and last month rent, which can be used by people with disabilities who are seeking rental housing.

Developmentally Disabled People

Quality Life Concepts, Inc. has provided home-based, respite, community support and residential services to adults with developmental and/or physical disabilities and their families. They provide services in 13 group homes which have a total capacity of 88 residents. The agency will also assist disabled individuals living in their own homes.

Easter Seals Disability Services--Goodwill provides a variety of services to people with developmental disabilities and anticipate serving approximately 250 developmentally disabled people annually. In fall of 2014 Easter Seals Northern Rocky Mountain renovated their second headquarters building near downtown Great Falls after recently relocating to the center of the Great Falls downtown core. 11,041 intensive therapy visits to 710 autistic children were recorded in the organization's 2014 Annual Report.

The focus group of the CHAS process which addressed housing for people with disabilities reported that less than half of the group homes for developmentally disabled people operated by Quality Life Concepts meet accessibility requirements. This group identified the following needs:

- five to six group homes on one level in safe neighborhoods, adaptable to specific needs
- supportive housing with services for severely disabled mentally ill, developmentally disabled and those with brain injuries
- current group homes need to be adapted to meet needs of aging clients

Elderly/Frail Elderly People

2011-2013 Census data reflects there are 9,718 people (16.4% of the total population) who are 65 years of age or older. The median age is 38. The portion of the population who is elderly has been steadily increasing and will continue to do so. As a result of these changes, the number of elderly people facing housing problems will increase, especially for people who have low and moderate incomes. Many of these elderly people will need subsidized housing and/or special housing facilities as they continue to age, including handicapped accessible units, assisted living facilities and congregate care facilities. A wide range of levels of in-home care such as meal delivery, home attendant services and transportation will be needed so elderly people can age in place. Other needs include medication management, assistance with activities of daily living and transportation.

The focus group of the CHAS process which addressed senior housing identified needs which included the following:

- more assisted living homes that are affordable for persons with Medicaid waivers
- a combination facility where home services can be provided to seniors
- more Medicaid waivers to keep seniors in assisted living instead of skilled care facilities

- a tax credit project with rents affordable for 50% area median income earners
- more HUD 202 rental projects that generally serve extremely low income seniors by providing extended project based rental assistance
- one-bedroom homes in safe neighborhoods for seniors who wish to sell their larger than needed homes

Single Parent Households/Victims of Domestic Abuse

In 2014 the YWCA Mercy Home, the primary provider of emergency/transitional housing and supportive services for victims of domestic abuse, sheltered 344 women and children who were victims of domestic violence. This number has increased from the last measure in 2009 (268). This agency reports an ongoing trend of women seeking housing services for a longer period of time where they will be safe from previous abusive relationships. The Mercy Home was designed to be emergency shelter and is not adequately designed for transitional housing. The YWCA also reports serving more victims who are not eligible for public housing until they pay past due balances which are often caused by abusive partners. Along with housing assistance, victims of domestic violence may require financial assistance for basic needs, counseling, legal assistance and training/education to assist with employment.

Increasing housing prices and rents make it difficult for single-parent households to purchase or rent safe, affordable housing. Most single-parent households are classified as low or very low income. NWGF reports a large proportion of the low income people they serve are single parent heads of household. Affordable housing options are available, however, these units are primarily of substandard condition, unsafe or not energy efficient so utility costs are prohibitive. Therefore, subsidized housing that is in decent condition is needed.

Youth

Kairos Youth Services provides 16 beds of emergency shelter/transitional housing along with supportive services for co-ed adolescents at their Evergreen and Missouri River Youth and Shelter Homes. They also provide six additional beds for severely emotionally disturbed co-ed adolescents at their Portage Place Therapeutic Group Home.

The Children's Receiving Home provides 14 beds and supportive services for children (0-18) removed from their homes from the judicial system.

CASA-CAN Children's Advocacy Network reports there are 478 abused and neglected children in Cascade County served in 2014 who are in some type of foster care placement. This number has nearly doubled from the previous Consolidated Plan (250). In addition, it was estimated 57% of these cases were in some way related to methamphetamine use in the community. An estimated 99% of these abused and neglected children are in families of poverty.

The focus group of the CHAS which addressed teens and teen parents reported public housing and many private parties will no longer rent to teen parents because of the vagueness in

Montana law concerning disaffirming contracts by persons under the age of 18 years. Some landlords will rent to teens under 18 years old in special circumstances but these units are not subsidized. Teens and teen parents who have to pay full rent may need to drop out of school in order to work full-time to be able to afford the rent. Such a situation can create long term poverty patterns because of a lack of education and inability to obtain employment which pays an adequate wage. The needs this group identified included the following:

- rent deposit assistance
- teen crisis stabilization facility
- supportive housing for teens graduating from foster care
- supportive housing for teens parents
- increased CDBG funding to improve current specialized housing

The need is seen for a supervised transitional living center for young parents to address the lack of affordable housing, especially for those ages 17 years and younger. In addition to housing, this group needs affordable daycare.

People with Alcohol/Drug Addictions

It is difficult to provide an estimate of the numbers of people with some form of alcohol and/or drug addiction. Gateway Recovery Services is the primary provider of intensive outpatient, treatment, case management, and residential treatment services for low and moderate income people who are diagnosed with a chemical dependency addiction. Current attempts for comment have been unsuccessful.

Public Housing Residents

Of the Great Falls Housing Authority's current resident families, 18 current residents are elderly and 23 disabled residents are on the public housing waiting list. These targeted special needs populations of residents will have needs similar to those in the population as a whole.

What are the housing and supportive service needs of these populations and how are these needs determined?

In addition to the supportive housing listed previously, numerous agencies assist non-homeless persons who have special needs.

The Center for Mental Health (CMH) provides children and adults with mental disorders with comprehensive community-based mental health services including psychiatric assessment and treatment; individual, group and family therapy; medication monitoring; case management; crisis intervention; and supportive employment and recreational activities. The agency currently provides day treatment but this service is at grave risk for being discontinued because of funding decreases.

CMH assists people with chronic and severe mental illness in transitioning from hospital settings such as the Montana State Hospital to independent living situations through the Program for Assertive Community Treatment. CMH has a Peer Support Program to assist clients in crisis or in need of recovery support. CMH works with local agencies such as Office of Public Assistance, Great Falls Rescue Mission, Opportunities, Inc., Salvation Army and St. Vincent DePaul Society to coordinate services. Services include assistance with housing, food, clothing, medical care and payee services for people with mental illness.

Easter Seals-Goodwill Industries provides a wide array of services to people with disabilities, including employment services, supportive and sheltered employment, supported living services, adult day programs, case management, home care and home health care.

Quality Life Concepts provides services for people with developmental and/or physical/ mental disabilities and their families. In addition to housing, they provide day activities; day programming; assistance with finances, medical appointments, shopping, transportation and other day-to-day living needs; vocational rehabilitation services; recreational/social activities; and assistance to families with children who have developmental disabilities or are at risk for developing delays.

Accessible Space, Inc. (ASI) is a national non-profit organization which provides accessible, affordable housing, assistive/supportive living and independent living opportunities for low income people with physical disabilities and brain injuries, as well as seniors. ASI has developed three apartment complexes in Great Falls: two provide accessible subsidized housing and supportive services for adults with mobility impairments and/or brain injuries and one provides accessible subsidized housing and supportive services for elderly people with low incomes.

The City-County Health Department provides a wide variety of services to the entire community, including people with low incomes or who are homeless. These services include disease prevention and control, nutrition education, food supplements, primary health care, dental care, case management, assistance with obtaining prescriptions and specialty medical care and parenting instruction.

The Indian Family Health Clinic serves low income urban American Indian patients as well as non-native people. Services include primary medical care, diabetes clinical services, prescription medication, behavioral health programs, fitness and wellness services and limited mental health counseling.

Gateway Community Services provides comprehensive alcohol and drug abuse treatment services, including intensive outpatient treatment, case management and residential treatment services for low and moderate income people diagnosed with a chemical dependency addiction.

Cascade County Aging Services provides supportive services such as home meal delivery, home attendants, health promotion, foster grandparents, retired senior volunteer programming and transportation to assist elderly people who are not homeless.

The Great Falls Senior Citizens Center provides low cost meals, health/exercise programs, tax preparation assistance, telephone outreach, information, educational workshops and recreational/social activities for elderly people in the community.

Several organizations and agencies have programs for ensuring people returning from mental health and physical health institutions will receive appropriate supportive housing, including Benefis Healthcare, Northcentral Independent Living Services, Easter Seals—Goodwill, CMH and Quality Life Concepts. Benefis Healthcare staff members provide discharge planning services for patients being discharged from the hospital. Discharge planners have an in-depth knowledge of all community services, including housing options statewide, and provide information about these services, as well as assisting with financial plans. Along with planning for the medical needs of the patient, discharge planning focuses on housing and supportive service needs.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The City-County Health Department (CCHD) reports as of January 2010, an estimated total of 23 people living in Great Falls have been diagnosed with HIV/AIDS. Demographics are available on 17 of this population as they are accessing case management services. Data indicates the following:

- five are female, twelve are male
- fourteen are white, two are African-American, one is other (undefined race)
- five are between the ages of 25 and 35, six are between the ages of 36 and 45 and six are between the ages of 46 and 55
- nine have annual incomes of less than \$1,000, four have incomes between \$10,000 and \$20,000, two have incomes between \$20,000 and \$30,000 and two have incomes between \$50,000 and \$60,000

The CCHD reports of these 17 people, ten are currently receiving supporting housing assistance. Eight of these ten are single adults living alone or with a partner/spouse. The other two are single with one or two children. A federal program, Housing Opportunities for People With AIDS, can provide security deposits and rental assistance. This grant-based program serves a tri-state area and is designed to fill the gap until people are able to find more permanent housing options such as Housing Choice vouchers. The local waiting list for this program is unknown. The CCHD indicates the priority supportive services needs of this

population are medical treatment, clothing, food, emotional/mental health support, substance abuse treatment and education about risk reduction.

The City of Great Falls as an entitlement community for CDBG funding does not receive HOPWA funds as of 2014-2015.

NA-50 Non-Housing Community Development Needs

Describe the jurisdiction's need for Public Facilities:

Most non-profit social service agencies continue to have difficulty securing the financial resources to pay for code deficiencies, badly needed rehabilitation or handicap accessibility in their buildings. In many cases the rehabilitation is necessary for the agency to continue to offer services and, in some cases, the demand for the service has increased so dramatically that additional space is needed. In addition to the needs presented by agencies, needs are seen within City departments to complete upgrades at a variety of city public facilities and public improvements to comply with Americans with Disability Act requirements. As noted previously, the City will need to continue to work toward meeting American with Disability Act requirements for handicap accessibility in infrastructure and public facilities.

City departments and a number of non-profit agencies apply for CDBG funding each year and the dollar amounts of these requests has been increasing over the recent years. During the application process for 2015/2016, the City received requests from two city departments (plus the Housing Authority) and one non-profit public service request for a total of \$200,920 in CDBG funding to meet public facility improvement needs. The total dollars requested for public facility projects was approximately 2.25 times the amount of funding available. Funding was requested for a broad range of activities such as handicap accessibility, sidewalk repairs, building renovations and energy efficiency upgrades. Based on the current trend, a high level of requests for CDBG funding for public facility improvement projects is projected to continue throughout the next five years.

A review of findings from the 1,496 surveys which were returned from an opinion survey undertaken as part of the CHAS process revealed the following as related to public facilities needs:

- of the 66% who know about disabled and handicap access and facilities, 34% indicated more or better quality is needed
- of the 52% who know about daycare services, 25% indicated more or better quality is needed
- of the 61% who know about senior center and senior services, 23% indicated more or better quality is needed
- of the 56% who know about crisis services, 31% indicated more or better quality is needed

How were these needs determined?

A CDBG Consolidated Plan Community Input meeting was held on March 13th in the municipal Civic Center with approximately 25 agencies represented and over 200 invitations sent via mail prior to the event. Comments from this event were transcribed by Planning and Community

Development staff and the entire session was taped for record. This is in addition to the 2010-2020 CHAS which is still in effect.

In addition to actively seeking citizen participation, the Community Development Council, a ten member volunteer advisory board, was appointed by the City Commission to review and prioritize public service grant applications and make funding recommendations to the City Commission. Meetings were held on the following dates:

- Wednesday, February 11 , 2015, 5:30-8PM. 8 proposal presentations
- Thursday, February 12, 2015, 5:30-8PM. 8 agency proposal presentations
- Tuesday, February 17, 2015, 5:30-8PM. 9 agency proposal presentations
- Monday, March 2, 2015, 5-7PM. Funding Allocation Meeting

Seven projects at a combined value of \$448,044 were proposed to the Council during this time, of which only \$214,752 were available for approved projects. Council members determined the most eligible projects using a 100 point scoring matrix. During the March meeting all members made their determinations based on this score including community need based on number of LMI persons served.

For example, one project scored low by many council members due to the improvement serving a limited number of people and the testimony of the applicant stating it has no stated need by any customers or MLI residents that they were aware of.

Describe the jurisdiction’s need for Public Improvements:

For the purposes of the Community Development Council, public improvement projects are categorized under Public Facilities. Please refer to Public Facilities for the jurisdictions need and how these needs were determined.

How were these needs determined?

For the purposes of the Community Development Council, public improvement projects are categorized under Public Facilities. Please refer to Public Facilities for the jurisdictions need and how these needs were determined.

Describe the jurisdiction’s need for Public Services:

A number of social service agencies apply for CDBG funding each year. An analysis of the CDBG applications received over the past five years for public service funds reflects the City received an average of ten different non-profit agencies for an average of \$15,399 requested in CDBG funding to meet public service needs. An average of \$7,594 was available, well below the \$10,000 minimum to fund public service applications. A broad range of requests are received from social service agencies seeking funding for activities such as child care

scholarships, food programs and office equipment. The trend for this high level of funding requests is expected to continue throughout the next five years. It is anticipated the needs will continue to increase exponentially in this category, especially if non-profit social service agencies continue to be faced with governmental funding cuts.

A review of findings from the 1,496 surveys which were returned from an opinion survey undertaken as part of the CHAS process reflected a significant need for the following public services for low income people:

- health care (especially in the form of a walk-in medical care facility)
- dental services or medical services for people with chronic conditions
- medication
- food
- utility assistance
- transportation, including extended bus service in the evenings and on weekends
- money management training

The need is seen for social service agencies to be able to provide their services on a scholarship basis to low income people using CDBG funds similar to the child care scholarships that are now being provided. For example, if supportive services such as transportation to medical appointments could be provided, it would allow special needs populations to live in their own homes rather than having to be housed in a care facility.

How were these needs determined?

A CDBG Consolidated Plan Community Input meeting was held on March 13th in the municipal Civic Center with approximately 23 agencies represented and over 200 invitations sent via mail prior to the event. Comments from this event were transcribed by Planning and Community Development staff and the entire session was taped for record. This is in addition to the 2010-2020 CHAS which is still in effect.

In addition to actively seeking citizen participation, the Community Development Council, a 10 member volunteer advisory board, was appointed by the City Commission to review and prioritize public service grant applications and make funding recommendations to the City Commission. Meetings were held on the following dates:

- Wednesday, February 11 , 2015, 5:30-8PM. 8 proposal presentations
- Thursday, February 12, 2015, 5:30-8PM. 8 agency proposal presentations
- Tuesday, February 17, 2015, 5:30-8PM. 9 agency proposal presentations
- Monday, March 2, 2015, 5-7PM. Funding Allocation Meeting

Seven projects at a combined value of \$153,994 were proposed to the Council during this time, of which only \$71,584 were available for approved projects. Council members determined the

most eligible projects using a 100 point scoring matrix. During the March meeting all members made their determinations based on this score including community need based on number of LMI persons served.

For example, one project scored low by many council members due to the service project serving as a pilot program but duplicating services provided by another local nonprofit. The applicant was unaware of how many LMI residents would benefit from the program or the sustainability of the project without CDBG funding.

Describe the jurisdiction's need for Economic Development:

The Great Falls Development Authority (GFDA) is the primary economic development organization in the community. The GFDA's mission is to lead Great Falls economic development efforts to promote growth, diversification and the creation of high wage jobs. The growth areas the GFDA will focus on are agri-processing, energy and entrepreneurship. One of their strategic priorities is to develop a heavy industrial park (Great Falls AgriTech Park) and this will involve working with existing businesses and entrepreneurs, identifying and contacting leads within the competitive niches of the target industries, networking to identify opportunities and expanding their web site services.

The Montana Government Contract Assistance Center and the Small Business Development Center will be housed within the GFDA offices.

The GFDA's financial services will continue to be business financing options such as loan programs, revolving loan funds and a SBA 504 program. The GFDA was allocated CDBG funds in the past to expand a CDBG revolving loan fund to provide gap financing to existing and start-up businesses to provide loans to businesses to create jobs for low income people.

The GFDA reports they are seeing a sharp increase in needs in the following three financial areas as a result of the credit crisis:

- 1) filling gaps in conventional lending markets,
- 2) additional unconventional loan capital to assist existing businesses and start-up entrepreneurs
- 3) real estate revitalization loan funds to address the gap financing needs of commercial real estate developers who are trying to renovate distressed properties

How were these needs determined?

Based upon documented citizen input on the previous 2010-2015 Consolidated Plan 30-day public review period, allocation to various categories determined by the CDC (housing, public services, and public facilities) was reorganized to accommodate the non-housing need of

Economic Development. In 2015, the City Commission approved \$50,000 to the Great Falls Development Authority for this need.

Housing Market Analysis

MA-05 Overview

Great Falls is located in Cascade County in the north central region of Montana and the geography is typical of the Northern Plains. The Rocky Mountain front is nearby to the west. The residential housing stock can be found in the relatively flat original townsite stretching east towards Malmstrom Air Force Base or within the hills of the city's northwest side. In 2013 the population of Great Falls was 59,091 (2013 ACS). In the past 13 years the population has increased by 4.2%; the population has increased only 1% since the 2010 Census.

Great Falls has a total minority population of 12.5%, with the largest percentage (5.4%) being American Indian or Alaskan Native. Census Tract 7 has the highest concentration of racial minorities and is one of the oldest areas of the City. Census tracts which have 15% or more racial minorities include 2,3,4,7,8, and 9, but do not near or exceed 25% in any (city-limit) tract.

The median age in Great Falls is 37.9 years; 23% of the population is under 18 years and 21% is 60 years or older. As the population matures in larger numbers, there will be greater demands for assisted living facilities and elderly support services. As demographic changes occur, the housing market will need to change to serve these residents. Over 51% of the families in Census tracts 4, 5, 6, 7, 8, 9, 16, 21, and 108 are low to moderate income. The highest concentration of low income households are in Census tracts 108 and 7. The poverty rate for Great Falls is 14.4%. Of the people at least five years of age or older, 15.4% report a disability.

In Cascade County in 2013, the highest percentage of those employed in private industry was 22% in services, 13.5% in retail trade and 7% in construction. Based on the Census Bureau 2011-2013 American Community Survey, the median household income in Great Falls is \$42,487 and the median family income is \$56,049. Per capita income is \$23,577, which is 84% of the national average. In 2013 the unemployment rate for Great Falls was 6.8% but is estimated between 2.5% and 3% today (Johnson Economics LLC 2015).

Census tracts 4, 8 and 16 are designated as slum and blight areas. Census tracts 108, 16 and 7 are included in a HUD-approved Urban Renewal Areas. Great Falls also has a designated HUB Zone which includes Census tracts 4, 5, 6, 7, 8, 9 and 108. An average of 78% of the houses in Census tracts 4, 5, 6, 7, 8, 9 and 108 were built prior to 1950.

The City of Great Falls Planning and Community Development Department worked with a consultant group (Johnson Economics) in the collection and analysis of the housing market within Great Falls. The findings of Johnson Economics were submitted on May 8th 2015 and incorporated within the *2015-2019 Consolidated Plan* thereafter as an appendix, Appendix A, to

reflect the most accurate data available and portray an accurate narrative of the current (post-recession) housing market.

MA-10 Number of Housing Units

Introduction

Information from the 2007-2011 ACS indicated there are approximately 26,498 residential properties within the city. The majority of these units are single family houses (62%) and nearly half (43%) of all units have two bedrooms. Only 5% of homes are manufactured housing. These numbers do not reflect characteristics outside of the city limits, where Malmstrom Air Force Base contains a large concentration of housing and county lands contain either larger lot homes or manufactured housing.

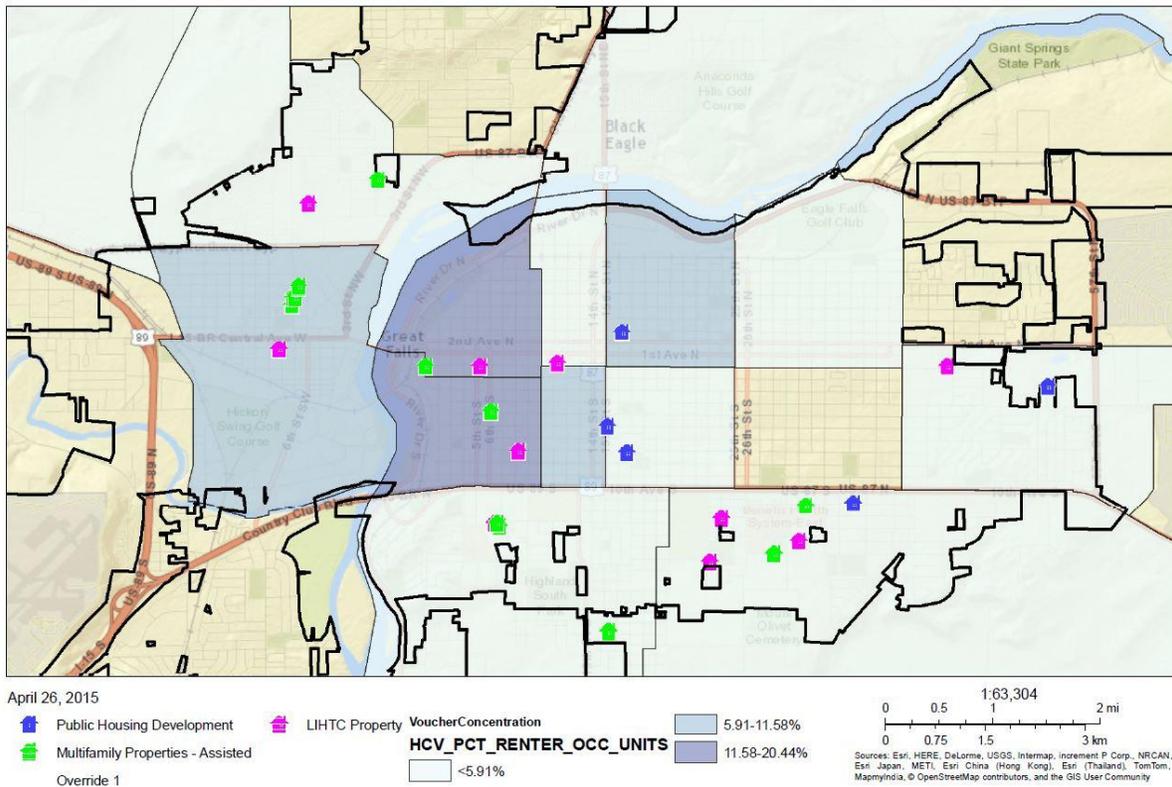
All residential properties by number of units

Property Type	Number	%
1-unit detached structure	16,546	62%
1-unit, attached structure	889	3%
2-4 units	2,924	11%
5-19 units	2,690	10%
20 or more units	2,014	8%
Mobile Home, boat, RV, van, etc	1,435	5%
Total	26,498	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2007-2011 ACS

CPD Maps - Multifamily, LIHTC, and Voucher Concentration - MA-10 Units Assisted



Multifamily and Voucher Concentration

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	0	0%	798	9%
1 bedroom	374	2%	2,409	28%
2 bedrooms	3,573	23%	3,724	43%
3 or more bedrooms	11,872	75%	1,816	21%
Total	15,819	100%	8,747	101%

Table 28 – Unit Size by Tenure

Data Source: 2007-2011 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Through CDBG and HOME funding, services from both the City and sub-recipients were provided to assist with low-to-moderate income households. This includes the construction of new homeownership and rental units, rehabilitation of older units (both to comply with ADA and

code standards and to add formerly-vacant units to the housing market in the downtown core) and home loan assistance.

The following specific activities were undertaken in 2014 to address the housing and supportive services needs of people who are not homeless but have special needs:

The Housing Authority will have 22 units of public housing which are ADA compliant for combined physical, hearing and vision impairments and nine units of handicap accessible affordable housing at Holland Court and Sand Hills. They will also provide accommodations to all tenants as directed by 504 requirements.

Accessible Space, Inc., will provide 23 units of accessible, subsidized housing for low income adults with severe mobility impairments and/or traumatic brain injuries at Southwinds Estates and 17 units at Meadow Lark Apartments. Twenty-four hour personal care attendant services will be provided or available at both housing complexes. ASI will also provide 47 units of accessible housing with availability of personal care attendant services for low income elderly at The Portage.

An effective tool for managing and mapping assisted units through CDBG and HOME funds is the CPD Maps web program, or Consolidated Plan mapping tool. Assisted properties, LIHTC projects, and public housing projects can all be mapped along with housing voucher concentration. This at-a-glance measure of where assisted units are located within the city is available not only to public agencies but residents of Great Falls as well at <http://egis.hud.gov/cpdmmaps/#>.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to the Great Falls Housing Authority staff, there have been minimal complaints received regarding the rejection of Section 8 eligible individuals and families by landlords and property managers. Of the few complaints received by the City of Great Falls Fair Housing Specialist the reasons stated were paperwork required, lack of payment for damages, and problems that have happened in the past with Section 8 renters. The Housing Authority raised their payments to 110% to be competitive with the rental market thus insuring a reasonable pool of Section 8 accepting landlords and property managers. Fair market rents (FMR) have dropped in the Great Falls MSA for the past several years, including FY 2015. Due to fair market rents being lower than local rents housing units continue opting out of the HUD program. This discrepancy is Impediment 1 in the 2015-2019 Analysis of Impediments to Fair Housing, attached as Appendix F.

Does the availability of housing units meet the needs of the population?

When comparing the 2000 Census to the 2007-2011 ACS, Great Falls added only 96 units of single-family homes to the total housing stock. These numbers do not accurately reflect the housing construction that has resumed post-recession in 2015 Great Falls. Much of this single family-growth can be seen on the city's northwest side. In this market, the desirability of single-family homes is likely to continue.

The City has worked with local developers and non-profit agencies to produce new housing opportunities. Unfortunately, the number of new affordable units is still smaller than the demand from low and moderate income residents. The private sector is unable to build single-family homes priced below \$125,000, except in limited numbers. And it takes an increasing grant subsidy for non-profit housing agencies to provide affordable units.

New construction of multi-family housing units has fluctuated greatly over the past five years, with the "Great Recession" severely hampering construction. In response to need, partner agency and local CBDO NeighborWorks has begun shifting priorities to multifamily housing. Based on these findings, multi-family construction seems to be more dependent on market demand than single-family construction. A clear need for a demonstrated number of rental units must be shown in order to justify the substantial investment needed to construct a large multi-family residential building.

The ability to produce affordable rental housing varies by the targeted rent levels. The private market is generally able to produce new rental housing that is affordable to households earning above 80% of the median income level when there is sufficient demand. In addition, many of the existing rental units are affordable to households earning over 70% of the median income if vacancy rates remain high. Once the demand for housing increases enough to make the vacancy rate drop below 5%, however, it becomes much more difficult to find suitable rental units that are affordable to low and moderate income households. In order to produce units for these residents, it is often necessary to provide the tenants or developers with some type of federal and/or state subsidy or incentive. The City clearly does not have sufficient resources to provide such assistance and the annual level of state and federal assistance is difficult to predict.

Mobile or manufactured homes represent another significant component of the housing market. There are approximately 12 developed mobile home parks where residents can rent a mobile home or a pad if they already own a unit. Mobile home parks provide a form of affordable housing; however, conditions in these parks vary dramatically. Anecdotal evidence indicates limited availability of parks that will allow mobile homes which are more than five years old. In addition to developed parks, there are a number of properties located throughout the community that contain two or more mobile homes. These are often older units in crowded and poorly maintained conditions. Since 1977, the City zoning ordinance has allowed only double-wide mobile homes to be located on lots in the single-family zoning districts provided they are placed on permanent foundations and use compatible exterior materials.

Describe the need for specific types of housing:

Following a citywide meeting of professionals and others interested in housing, a housing plan group was formed to focus on the development of a comprehensive housing affordability plan for Great Falls and Cascade County, with the goal of assisting local organizations and the city and the county to address the housing and community development needs into the next decade.

The housing plan group gathered information and data from four different surveys, fifteen focus groups, and town meetings in the cities of Belt and Cascade, Montana. The state Department of Commerce contributed a community profile. From the data gathered over a period of two years and five months, the housing plan group produced a summary of strategies to meet the greatest needs identified. The summary was presented to the full Great Falls/Cascade County Housing Planning Group on February 25, 2010. The full planning group adopted key strategies to meet housing needs. The strategies denoted in italics below and combined into seven priorities to meet unmet needs in our community were adopted for inclusion in the *Great Falls/Cascade County CHAS 2010-2020*:

- *Construct or rehabilitate buildings to create transition housing with support services for individuals and families who are homeless, teenagers, young parents, ex-felons or suffer from mental illness.*
- *Address the need for affordable student/health worker rental housing in the medical-education district near university, college of technology, and hospital such as the newly constructed student housing at UGF or pursue creative leasing options for existing housing.*
- *Address the affordable housing needs of the community's growing senior population*
- *Construct affordable, accessible rentals for seniors, such as the planned Accessible Space project.*
- *Expand the existing senior home improvement programs to reach more people.*
- *Increase the number of Medicaid waiver slots and find more assisted living facilities that will accept the waivers.*
- *Encourage combination facilities where in-home services can be provided to seniors.*
- *Create middle income condominiums or townhomes in the downtown area as a key to downtown redevelopment. Utilize incentives to make renovation possible. Support historic building renovation.*
- *Adopt affordable housing zoning ordinances to include universal accessibility and energy efficiency features. Expedite zoning approval in return for housing affordable or lower households.*
- *Improve the quality of rental housing stock available to those receiving Housing Choice vouchers. Build or rehabilitate more rental housing stock to meet HQS standards and to be more energy efficient.*
- *Preserve existing manufactured housing communities.*

These housing needs were reinforced during outreach meetings in December 2014 and March 2015 during the CDBG Consolidated Plan Community Input meeting: the need for safe, affordable housing. A common item addressed in these input meetings are the idea for “workforce housing”: quality choices outside of the needs of LMI residents. Many rentals options were noted as substandard by participants. Please see [Appendix C](#) for documentation.

MA-15 Housing Market Analysis: Cost of Housing

Introduction

According to 2007-2011 data from Table 29-Cost of Housing, median home value has greatly increased from 2000 to today; a jump of 67% occurred over the last eleven years. This is similar to trends seen in other large cities in Montana. For examples, Missoula's median home value increased by 76% from 2000 to 2009 (Missoula 2014-2018 Consolidated Plan).

Median Contract Rent has also increased, from \$365 in 2000 to nearly \$500 in 2011. This equates to greater housing costs for renters as well as homeowners, with over 50% (58.3%) of renters paying less than \$500 for their housing. While rents are low, this \$113 increase in rent negatively affects many of Great Falls' lowest income residents. Only 1,015 renters can afford units earning 30% of HAMFI.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	89,700	149,900	67%
Median Contract Rent	365	478	31%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	5,095	58.3%
\$500-999	3,338	38.2%
\$1,000-1,499	82	0.9%
\$1,500-1,999	76	0.9%
\$2,000 or more	156	1.8%
Total	8,747	100.0%

Table 30 - Rent Paid

Data Source: 2007-2011 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,015	No Data
50% HAMFI	3,305	825
80% HAMFI	5,940	3,410
100% HAMFI	No Data	5,835
Total	10,260	10,070

Table 31 – Housing Affordability

Data Source: 2007-2011 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	496	517	663	959	977
High HOME Rent	476	497	637	922	939
Low HOME Rent	476	497	637	772	862

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Data from the National Low Income Housing Coalition (NLHIC) provided information, last updated in February 2015, regarding housing affordability in several Metropolitan Statistical Areas in the state of Montana. This data includes “Regional Rental Affordability Statistics”. This provides a comparison not only national average median income (AMI) but several comparable markets in Montana to the Great Falls MSA. 2013 ACS data states that renters make up 33% of all households in Montana, or 134,172 total. NLHIC indicates that nearly three-fourths (72%) of Montanan renters are severely cost burdened when incomes fall below 30% of AMI. That is 24,291 severely burdened households. 25% (33,735) total renters in Montana are severely cost burdened. Incomes below 50% would find 80/100 units affordable to rent, while incomes below 30% would only find 47 affordable.

Regional Affordability Statistics

The Great Falls MSA has 11,295 total rental households under the same data. Area median income is \$56,200, while earning 30% of that AMI would net \$16,860. This AMI is \$15,000 less than Gallatin County and the lowest among Montana MSA’s. Rent affordable at 30% AMI is \$422 while \$446 is available in Billings or \$459 in Missoula. For renters in Great Falls, fair market rent for a one bedroom is \$75 greater than affordable rent. When compared under a different parameter, the average renter wage in the area of \$10.35 is below the two-bedroom housing wage projected by these values. In Great Falls renters could afford a one bedroom, however; a benefit not available to peer city Missoula.

The HUD FY 2015 Fair Market Rents increase slightly, from \$497 to \$505 for a one-bedroom. Table 32 shows fair market rents jump nearly \$300 from two bedrooms to three bedrooms, however, a burden on larger families who rent.

The City has worked with local developers and non-profit agencies to produce new housing opportunities. Unfortunately, the number of new affordable units is still smaller than the demand from low and moderate income residents. The private sector is unable to build single-family

homes priced below \$125,000, except in limited numbers. And it takes an increasing grant subsidy for non-profit housing agencies to provide affordable units.

How is affordability of housing likely to change considering changes to home values and/or rents?

The basic housing affordability problem for many residents is the disparity between income levels and housing costs, especially for low and moderate income people. Average housing prices have grown faster than income levels, making it difficult or impossible for many families to save enough for a down payment or to afford the monthly cost of a mortgage, interest, insurance and taxes. This problem is worse for people with poor credit histories, especially those people with low and moderate incomes.

Housing that is considered affordable is defined as housing units that have sales prices or rents that are within the means of a low or moderate income household. The private housing market does not generally provide affordable housing without some type of subsidy or incentive. Public agencies and non-profit organizations have been very active in housing programs for many years, as described elsewhere in this report. Despite their success, however, the ability of low and moderate income families to acquire housing has still been adversely affected as a result of costs rising faster than incomes.

Another problem related to housing affordability is a shortage of quality houses in certain price ranges. Housing units that may be affordable to residents within certain income groups often have physical problems that make the units ineligible for financing from private lending institutions, as well as unattractive to potential buyers. In other cases, the houses may be in good enough condition to qualify for a loan but the unit is priced too high for low or moderate income potential buyers to afford.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Using data from [Table 32](#) provided by HUD, Fair Market rents are comparable to HOME rents when considering efficiency or one bedroom apartments. FMR is \$496 for an efficiency and \$517 for a one-bedroom in this community; HOME rents are only \$20 less or both the high and low measure. This apartment size likely reflects the needs of the elderly, mentally and physically disabled or LMI single workers in the region that are supported by area services.

That same data from [Table 32](#) also shows a much larger gap between HOME rents and FMR when considering larger apartments, especially 3-4 bedrooms. Comparing Fair Market Rent to the Low HOME rent shows a \$187 gap between the higher (959) FMR and lower (772) HOME rent. Combined with a median contract rent of under \$500, large families or families with children who must rent face both limited housing choices in this market and a higher cost. [Table 28](#) of this document shows 21% of renters occupy a 3-bedroom or larger apartment.

MA-20 Housing Market Analysis: Condition of Housing

Introduction

Table 33-Condition of Units shows the year housing units were built for both owner-occupied and renter-occupied. Looking at the age of residential structures is helpful in evaluating physical condition. According to American Community Survey data, nearly half (45.7%) of all housing units are over 55 years old. As the community's housing units continue to age, increased investment for maintenance, repairs, rehabilitation and replacement will be needed to maintain the quality of living conditions and prevent deterioration of neighborhoods.

78% of owner-occupied units had no selected conditions (housing problems as defined by HUD) while only 60% of renter-occupied units met that definition. Of the remaining 40%, 37% were found to have one selected Condition.

Definitions

The Condition of Units fall under four separate housing problems, defined as:

- housing unit lacks complete kitchen facilities
- housing unit lacks complete plumbing facilities
- household is overcrowded;
- household is cost burdened.

A household is said to have a housing problem if they have any one or more of these four problems (CHAS)

What constitutes overcrowded, and cost burdened can be further defined by HUD as:

- Overcrowding – More than 1 person per room.
- Severe overcrowding – More than 1.5 persons per room.
- Cost burden – monthly housing costs (including utilities) exceed 30% of monthly income.
- Severe cost burden – monthly housing costs (including utilities) exceed 50% of monthly income.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,415	22%	3,266	37%
With two selected Conditions	45	0%	189	2%
With three selected Conditions	47	0%	44	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	12,312	78%	5,248	60%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total	15,819	100%	8,747	100%

Table 33 - Condition of Units

Data Source: 2007-2011 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,347	9%	505	6%
1980-1999	2,074	13%	1,440	16%
1950-1979	8,712	55%	4,026	46%
Before 1950	3,686	23%	2,776	32%
Total	15,819	100%	8,747	100%

Table 34 – Year Unit Built

Data Source: 2007-2011 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	12,398	78%	6,802	78%
Housing Units build before 1980 with children present	485	3%	425	5%

Table 35 – Risk of Lead-Based Paint

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	2,151	0	2,151
Abandoned Vacant Units	0	0	0
REO Properties	10	0	10
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source Comments: Suitability for rehabilitation undetermined using ACS dataset

Vacancy: Table 6.5 (below) presents estimated vacant units by category. Overall, an estimated 8% of the City housing stock, and 11% of county housing stock is estimated to be vacant. The County has a higher share of seasonal and recreational units among its vacant stock.

Table 6.5: Vacant Units by Category (2013)

DATA CATEGORY	GREAT FALLS		CASCADE COUNTY	
	# of Units	%	# of Units	%
Category of Vacancy				
For rent	851	40%	958	24%
Rented, not occupied	46	2%	100	2%
For sale only	377	18%	705	17%
Sold, not occupied	108	5%	243	6%
For seasonal, recreational, or occasional use	240	11%	1,008	25%
For migrant workers	0	0%	0	0%
Other vacant	529	25%	1,017	25%
Total Vacant	2,151	100%	4,031	100%
Vacancy Rate (All Units)	8%		11%	
Imputed Rental Vacancy	9%		8%	

¹ US Census; 2011-2013 American Community Survey 3-Year Estimates; Table B25004
Sources: US Census, Johnson Economics LLC

Vacant Units by Category (2013)

Need for Owner and Rental Rehabilitation

2011-2013 American Community Survey data indicates there are over 2,100 (2,151) vacant housing units within the City of Great Falls at 8% of the housing stock. However, the most recent Market Study conducted by the city (May 2015) projects vacancy as low as 2.5%. No physical inventory has been conducted by the city and no NEO Property data was provided in the most recent market study.

To quote a consultant, Johnson Economics, regarding the rental market in Great Falls:

By all accounts the vacancy rate in Great Falls is very low. Property manager's report that units remain vacant long enough to clean and prepare them for a new tenant. Available units are often filled in a day or a few days, with some managers reporting no need to advertise the vacancy in any formal way.

Multiple large complexes report being 100% leased, with units rented as they come available. While vacancies do occur from normal turnover, they are filled immediately, meaning no long-term structural vacancy. Older and less marketable properties may remain vacant for a longer period. The U.S. Census estimated a local rental vacancy rate of over 8% as of 2013, but the rate seems to be much lower than this currently. Based on listings identified, JOHNSON

ECONOMICS estimates current rental vacancy in the market at 2.5% to 3.0%. (A third-party source, Sperling's Best Places, estimates vacancy at 2.9%, but the source is unclear.)

Property managers typically use an occupancy rate of 95% (5% vacancy) to represent being "fully leased." In other words, 5% vacancy represents a sustainable level representing normal turnover and allowing apartment shoppers to have a selection across properties and unit types. Therefore vacancy of less than 3% represents a tight rental market, with limited availability and selection among properties. In this type of market, the most attractive properties will tend to maintain near 100% occupancy, while substandard properties will be over-represented in the available supply.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Using both ACS and CHAS data sources provided in [Table 35](#), there are approximately 485 owner-occupied units and 425 renter-occupied units built before 1980 with children present. While only accounting for 3% and 5% of all units, respectively, each provides risk to children in our community. Only 20-22% of housing in Great Falls was built after 1980, significantly older housing stock than other large Montana cities.

Preventive and rehabilitative measures will be taken in all CDBG and HOME funded housing and public facilities projects that serve young children to ensure the extinction of lead-based paint hazards. All rehabilitation projects in which the building was constructed before 1978 will address lead-based paint regulations. Information about lead-based paint hazards will be provided to all people who apply for City housing rehabilitation loans. If lead-based paint is found during initial testing on a project where families with children under the age of six reside they will be referred for testing for lead-based paint exposure.

All CDBG and HOME funded housing project sites which have visual paint deterioration where rehabilitation will take place will be tested by a certified risk assessor for the presence of lead-based pain using the XRF Technology Lead Analyzer. On any sites that test positive, only contractors certified in safe work practices will be used for abatement. Clearance tests will be performed by an Environmental Protection Agency (EPA) certified risk assessor and a certified laboratory after interim controls are completed.

MA-25 Public and Assisted Housing

Introduction

Only one Public Housing Authority exists within the city of Great Falls: the Great Falls Housing Authority. The GFHA was designated by HUD as a high performing public housing authority yearly through 2009 based on the Public Housing Management Assessment Program. In reviewing the Section 504 needs assessment, the GFHA is in compliance with the physical handicapped accessibility requirement for housing authority facilities. The GFHA will take into account the handicap accessibility requirements (5% rule) during any rehabilitation projects. It has housing designated for the elderly/disabled and has established partnerships with assistive agencies within the community to assist those residents.

The Great Falls Housing Authority will encourage tenants to be involved in the management of public housing through having two tenants on the Housing Authority Board of Commissioners. It writes and distributes a quarterly newsletter and hosts public hearings to obtain input from residents as to their needs and opinions, including those related to the annual plan and proposed rehabilitation of housing units. The information obtained from hearings will be considered in the annual grant applicant.

The GFHA is governed by a seven-member Board of Commissioners appointed by the Great Falls City Commission. The community members of the Board serve five-year terms and the resident members serve two-year terms. All members serve without compensation. The Board contracts for staff and management services from the city.

Strategy for Addressing Housing Needs

The GFHA strives to effectively maintain and manage its public housing stock. Policies are in place to ensure this goal is carried out. With these policies they are reducing turnover time on vacated and renovated units. Payment standards are at 110% to assist families in broadening their housing choices. We are also marketing to prospective landlords throughout our jurisdiction. We screen all applicants to provide these landlords with quality tenants. To assist in the need for housing, they have completed Phase I & II of the Sand Hills development to date. Austin Hall is designated as elderly/disabled to assist with this population and continue to work with local assistive agencies. We affirmatively further fair housing by working with the City of Great Falls Fair Housing Specialist. See the Great Falls Housing Authority PHA 5-Year and Annual Plan.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			490	250			0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Housing Authority is the public housing authority for Great Falls and its mission is to work toward a community that provides safe, affordable housing. They educate and assist residents to develop skills necessary to maintain successful residency, to improve quality of life and to pursue self-sufficiency. The Housing Authority own and manage 490 units of public housing at five different sites.

The GFHA reports that 85% of the households on the public housing waitlist qualify for a one bedroom unit, while these units only make up 28% of the housing stock. Households seeking larger unit sizes generally face less of a wait.

The Great Falls Housing Authority (GFHA) and Opportunities Inc. administer a total of 735 vouchers. 88% of vouchers are in use as some households are seeking an appropriate unit, or are otherwise in transition. There is a list of 590 households waiting for vouchers, representing 80% of the vouchers available. The waiting period is estimated at 6 to 8 months.

The Great Falls Housing Authority own and manage 490 units of public housing at five different sites. Inspections occurred on all five sites most recently in 2014. These inspection dates are provided below:

- 5/8/2014 10:06
- 5/9/2014 15:01
- 6/23/2014 10:47
- 5/12/2014 10:37

Public Housing Condition

Public Housing Development	Average Inspection Score
Austin Hall/Parkdale MT002000001	81
Austin Hall/Parkdale MT002000005	95
PARKDALE MT002000002	78
Sunrise Courts MT002000003	81
Yeoman Tynes/Russel MT02000004	83

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The Housing Authority will continue the multi-year rehabilitation project at the main site (MT2-1 and MT2-2) which involves upgrading the overhead electrical distribution system, street lights, sewer mains, water mains and gas distribution systems for 356 units and major interior renovation of 156 units. The units will be demolished down to the studs and rebuilt, including new roofs; windows; doors; walls; flooring; electrical, plumbing and heating systems. Exterior sewer, water and electrical services will also be replaced. The overall project will take ten to fifteen years to complete. In the 2014-2015 year one four-plex (four units) was scheduled be remodeled.

Sand Hills is the newest affordable housing complex completed by the Housing Authority and consists of 8 two-bedroom handicapped adaptable housing units. Construction was completed in 2013.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

From GFHA's website:

The Great Falls Housing Task Force will meet regularly to collect and share statistics on housing affordability, availability and accessibility; to discuss and project trends within the local housing market; and, to promote fair housing activities.

The Great Falls Housing Authority communicates with residents monthly including newsletters that are posted on-site and online.

The Great Falls Housing Authority has one full-time Community Police Officer.

Police Youth Activity Club (PYAC) is an activity group for school-age kids in our Public Housing and Section 8 Voucher programs. The PYAC program is directed by Housing Authority Community Police Officers and presents an opportunity for building an atmosphere of trust and

mentoring with our Officers, as well as having some great times. Parent participation is encouraged.

The Great Falls Housing Authority offers a satellite unit of the Boys & Girls club located at 1722 Chowen Springs Loop.

We are proud to offer scholarships to graduating seniors who plan to pursue higher education. Applicants must be residents of the GFHA's Public Housing or Section 8 Voucher program and must maintain a 2.5 grade point average to apply for the scholarship. GFHA also provides scholarship money for children to assist with extracurricular activities.

Little Buddies is a monthly program for pre-school children and their parents offering a fun-filled hour of play and an added bonus of lunch for the families.

Dronen Hall, a community hall, attached to the Housing Authority office at 1500 Chowen Springs Loop, is available for tenant use for birthday parties, baby showers, etc. A \$40.00 deposit is required and refunded when the hall is cleaned and the key is returned.

Discussion:

Please refer to the *2015-2019 Analysis of Impediments to Fair Housing* ([Appendix F](#)) for significantly greater detail into public housing and Housing Choice Voucher program.

MA-30 Homeless Facilities and Services

Introduction

Transitional housing with supportive services is identified as the highest priority need for individuals and families who are homeless, as well as special populations such as teenagers, young parents, ex-felons or people who have mental illness. To meet this need, The City will support development of transitional housing or other housing options for homeless people or people who are at risk of becoming homeless if appropriate application is made for CDBG/HOME funding for new construction or rehabilitation projects. The CoC verifies transitional housing as a current priority need.

The City will facilitate the local Continuum of Care for Homelessness (CoC) group. The CoC group will meet regularly throughout the upcoming year to expand understanding of the services needed by those who are homeless, to facilitate consolidation and coordination of homeless services and to improve service delivery to homeless people. The City will facilitate the meetings. The CoC meetings will provide a networking opportunity and assist in keeping funding options open for future HUD homeless grant funds.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	118	5	104	0	0
Households with Only Adults	71	20	71	207	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	12	0	0
Unaccompanied Youth	22	0	22	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source
Comments:

Activity	Agency/Organization	Services/Capacity
Outreach & homelessness prevention:	Voices of Hope	24 hour hotline, ongoing outreach, community education
	Faith-based organizations	Ongoing outreach

	Opportunities, Inc.	Eviction prevention intervention & counseling
	City Fair Housing	Education services for landlords & tenants
	NHS	Foreclosure prevention loans
	Habitat for Humanity	Foreclosure prevention assistance for partner families
	Rural Dynamics, Inc.	Foreclosure prevention counseling
	Young Parents Education Center	Individual counseling and group classes, referrals to avoid eviction, assistance with rental applications, coordination with landlords to prevent eviction/homelessness
	Center for Mental Health	Individual counseling & assistance for people being discharged from mental health facilities
Emergency shelter & supportive services:	Great Falls Rescue Mission	71 beds of emergency/transitional shelter for men & 59 beds of emergency/transitional shelter for women & families; additional 20 mats on the floor for men in emergency & 5 mats & foldaway cribs for women & families in emergency; supportive services of meals; primary health care; optical, chiropractic, emergency dental & hygiene care; legal assistance
	Human Services Resource Center (Opportunities, Inc.)	Limited motel vouchers for emergency shelter, intake, referral, food, housing, clothing, medical care, prescriptions, clothing & transportation
	Missouri River Youth and Shelter Home (Kairos Youth Services)	8 beds of emergency shelter/transitional housing & supportive services for male adolescents
	Evergreen Youth and Shelter Home (Kairos Youth Services)	8 beds of emergency shelter/transitional housing & supportive services for co-ed adolescents
	Portage Place Therapeutic Group Home (Kairos Youth Services)	6 beds of emergency shelter/transitional housing & supportive services to severely emotionally disturbed co-ed adolescents
	YWCA Mercy Home	Capacity to house 30 women & children; supportive services include crisis intervention, support groups, information and referral, group counseling, personal advocacy, parenting classes, 911 cell phone lending program, transportation, legal advocacy, resume building & employment coaching
	Children's Receiving Home	14 beds & supportive services for children (age birth to 18 years) removed from their homes by judicial system; also provide emergency foster care
	Young Parents Education Center	Limited emergency rental assistance
Transitional housing & supportive services:	Great Falls Rescue Mission	71 beds of emergency/transitional shelter for men & 74 beds of emergency/transitional shelter for women & families; also have additional 20 mats on the floor for men in emergency & 5 mats & foldaway cribs for women & families in emergency; supportive services of meals; primary health care; optical, chiropractic, emergency dental and hygiene care; legal assistance

	Evergreen Youth and Shelter Home (Kairos Youth Services)	8 beds of emergency shelter/transitional housing & supportive services for co-ed adolescents
	Portage Place Therapeutic Group Home (Kairos Youth Services)	6 beds of emergency shelter/transitional housing & supportive services for severely emotionally disturbed co-ed adolescents
Activity	Agency/Organization	Services/Capacity
	Missouri River Youth and Shelter Home (Kairos Youth Services)	8 beds of emergency shelter/transitional housing & supportive services for male adolescents
	Blue Thunder Lodge (Gateway Community Services)	8 beds of transitional housing & supportive services for Native American males transitioning out of chemical dependency treatment
	Center for Mental Health (Center West)	7 transitional living beds & 5 transitional group home beds & supportive services for adults with severe disabling mental illness or disabled veterans
Permanent/ supportive housing:	Meadow Lark Apartments (Accessible Space Inc.)	17 unit accessible subsidized housing complex & supportive services for low income mobility/brain impaired adults
	Southwinds Estates (Accessible Space, Inc.)	23 unit accessible subsidized housing complex & supportive services for low income mobility/brain impaired adults
	The Portage (Accessible Space, Inc.)	47 unit accessible subsidized housing for low income adults
	Opportunities, Inc.	Assist in administering HUD Veterans Administration Supported Housing vouchers by accepting VASH referrals & doing housing inspections
	Center for Mental Health	1 Shelter Plus Care housing voucher
	Center for Mental Health	4 group homes (32 total beds) for adults with SDMI
	Center for Mental Health	9 beds of adult foster care for adults with SDMI
	Quality Life Concepts, Inc.	14 group homes with total capacity for 96 adults with physical & developmental disabilities

Facilities Targeted to Homeless_CAPER

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The Great Falls Rescue Mission will do outreach to chronically homeless people through the day room program and will provide sleeping mats to chronically homeless people during nights which have life threatening weather.

The Center for Mental Health will have an adult case manager who will provide outreach and wellness checks for chronically homeless people.

Opportunities, Inc., will provide support to chronically homeless people through screening for homelessness issues during intake, referrals, limited case management, financial assistance and job training assistance.

The YWCA will provide 30 different human service agencies with vouchers for chronically homeless people to use at its used clothing store.

The Indian Family Health Clinic will provide community resource information through group sessions provided by staff members.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The Great Falls Rescue Mission (Rescue Mission) is the primary emergency shelter provider in Great Falls. It is difficult to delineate the specific numbers of beds available for emergency shelter versus transitional housing as *the organization does not use governmental funding and is not restricted by specific programming requirements*, therefore, they can be flexible regarding bed usage. Whether a specific bed is used for emergency or transitional shelter is driven by actual need that particular day. Overall, there are 71 beds available in the men's shelter and 74 beds in the women and family shelter. This is an increase from the 59 beds available previously due to an expansion of the women's shelter. The number of people who can be housed at the women and family shelter depends on the composition of the family. In an emergency such as life threatening weather, the Rescue Mission will also provide an additional 20 mats on the floor for men and five mats and foldaway cribs for women and children.

The Rescue Mission has purchased property near to their current facilities and is currently fundraising for the new facility which will provide emergency shelter/transitional housing for approximately 100 people (families and women).

MA-35 Special Needs Facilities and Services

Introduction

Although it is difficult to identify the precise number of people who have special needs, data from the 2009-2013 Census ACS update reflects 8,791 individuals age five years and older with a disability reside in Great Falls. Although more specific Census data is not available for Great Falls, 2011-2013 ACS data for Cascade County indicate there are 6,049 people who are 16 years or older with outside-home/self-care disabilities and 11,453 disabled persons age five years and older with sensory/physical/mental disabilities (person can have more than one disability). It is of note that of the 1,299 individuals who responded to a community opinion survey question about limitations, 320 people indicated they are limited in some way because of physical, mental or emotional problems.

The search for affordable housing is complicated for individuals facing serious disabilities or other special situations. Both the public and government agencies have become increasingly aware of the need to work with the private sector and non-profit organizations to develop viable housing options for people with special needs, including the elderly, disabled, homeless and single female-headed households. An important component of successfully addressing housing needs is integrating low income and special needs housing units into the community. In addition, people with disabilities or who have other special needs require supportive services concurrent with housing assistance.

Extensive community-wide surveying was done through the CHAS process to determine community needs. Results of the 1,496 surveys which were returned from an opinion survey indicated the following significant needs as related to the special needs population:

- more housing for people with physical or mental disabilities
- more permanent housing opportunities for teen parents who are pursuing schooling and caring for children
- more permanent housing opportunities for victims of violence
- more apartments for the elderly
- more housing options for low income elderly more group homes for people who are mentally ill, developmentally disabled, adult foster care, youth foster care, runaway youth and at risk youth
- more personal care facilities
- more nursing home space

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The Housing Authority provides 22 units of public housing which are ADA compliant for combined physical, hearing and vision impairments and nine units of handicap accessible affordable housing at Holland Court and Sand Hills. They will also provide accommodations to all tenants as directed by 504 requirements.

Accessible Space, Inc., provides 23 units of accessible, subsidized housing for low income adults with severe mobility impairments and/or traumatic brain injuries at Southwinds Estates and 17 units at Meadow Lark Apartments. Twenty-four hour personal care attendant services will be provided or available at both housing complexes. ASI will also provide 47 units of accessible housing with availability of personal care attendant services for low income elderly at The Portage.

Easter Seals-Goodwill Industries provides a variety of services to people with disabilities and disadvantaging conditions. Services will include supportive and organizational employment, employment placement and training support, supported living, adult day programs, home care and home health care.

Quality Life Concepts, Inc., provides housing services for adults with developmental and/or physical disabilities. QLC will also provide supportive living services for disabled people living in their own homes, as well as providing community-based day programs/services including: day activities and programming; assistance with finances, medical appointments, shopping, transportation and other day-to-day living needs; vocational rehabilitation services; recreational/social activities and assistance to families whose children have a developmental disability or are at risk for delay.

The City-County Health Department provides a wide variety of health care services to the entire community, including people with low income and who are homeless. These services include disease prevention and control, nutrition education, food supplements, primary health care, dental care, mental health counseling, case management, assistance with obtaining prescriptions and specialty medical care, sexually transmitted disease testing and medication and parenting instruction. The Health Department will provide educational services to inform the public and professional community members about lead-based paint hazards when requested. The agency anticipates serving approximately 4,000 families in the upcoming year.

The Indian Family Health Clinic will provide primary medical care, diabetes clinical services, prescription medication, behavioral health programs (including chemical dependency and tobacco prevention, HIV/Hepatitis C prevention), wellness services, limited community resource advocacy and limited mental health counseling.

Gateway Community Services provides comprehensive alcohol and drug abuse treatment services, including evaluation, intensive outpatient treatment, adult and adolescent co-occurring mental health services, residential treatment services for low and moderate income people diagnosed with a chemical dependency addiction, case management, relapse prevention, anger

management and monthly monitoring, early intervention and community prevention classes and outreach activities for community awareness.

Cascade County Area VIII Agency on Aging provides supportive services such as home meal delivery, home attendants, health promotion, foster grandparents, retired senior volunteer programming and transportation to assist elderly people who are not homeless. The Great Falls Senior Citizens Center will provide on-site low cost meals, health and exercise programs, tax return preparation assistance, telephone outreach, educational workshops and recreational/social activities for elderly people in the community.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The Center for Mental Health (CMH) will provide children and adults with integrated community-based mental health services and substance abuse services. In addition to the housing assistance options previously noted, services will include psychiatric assessment and treatment; medication monitoring; crisis stabilization; individual, group and family therapy; day treatment; and supportive services such as case management, supported employment and recreational activities. The agency noted as of March 2013 they had 2,468 open cases in Cascade County. CMH will administer the Program for Assertive Community Treatment (PACT) which assists people with chronic severe mental illness in transitioning from the Montana State Hospital to independent living situations. This program will offer 24 hour coverage for clients with psychotic disorders and will be operated at the Wellness Recovery Center. The agency will operate the New Directions Center to provide services such as casement management, adult therapeutic aide services and supported employment. Day treatment and educational classes will also be provided on a part-time basis at the New Directions Center.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The following projects being allocated 2015/2016 CDBG funds will benefit people with special needs:

Housing and Public Facilities

Great Falls City Park & Recreation - Chowen Springs Park was awarded a \$40,000 CDBG grant to purchase and replace the Chowen Springs play structure with an ADA accessible play structure. The park is adjacent to a public housing development.

Great Falls City Park & Recreation – Natatorium was awarded \$31,183 CDBG grant to replace of doors, doorframes, and transoms at the City’s indoor swimming pool where disabled swimming activities take place.

Great Falls Housing Authority – Holland Court Rehabilitation Project was awarded \$97,737 to redesign, remove, and replace existing sidewalks, parking lots, asphalt, and handicap ramps around a public housing complex to bring the facility up to current building codes.

Great Falls City Public Works – Sidewalk Project was awarded \$30,000 CDBG grant to assist low to moderate income homeowners replace broken or deteriorated sidewalks that do not meet current City code.

Public Services

Area VIII Agency on Aging – Meals on Wheels was awarded \$25,000 CDBG grant to purchase food for the Meals on Wheels program that delivers meals to low to moderate income elderly who are handicapped or unable to prepare meals for themselves.

Great Falls City Park & Recreation – Morony Natatorium & Community Recreation Center Scholarship was awarded \$10,000 CDBG grant to provide scholarships for disabled adults to participate in dedicated swim classes.

Quality Life Concepts, Inc. was awarded \$10,000 to purchase hospital beds and a lift for its disabled client’s day program as well as purchase a camera monitoring systems for two of its high risk group homes.

Link to one-year goals

272 units of subsidized housing, when surveyed on January 2, 2014 by the Fair Housing Specialist, are listed as Accessible Units. 91 of these units are filled by the mobility impaired. Voyageur Apartment, a planned housing development for the elderly population, will add 37 additional beds when it is constructed in 2016.

These efforts directly link to Goal 6 of the Strategic Plan and 2015-2016 Action Plan:

Fair Housing

Provide affordable housing opportunities for very low and low income renters, particularly the elderly and/or disabled. The City of Great Falls will continue to provide non-profit, social service agencies CDBG funds to rehabilitate and subsidize rental housing for the elderly and/or disabled. Project-based rental assisted housing providers should apply for housing upgrades using CDBG dollars (Community Development Council) when available.

MA-40 Barriers to Affordable Housing

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Great Falls first adopted a zoning ordinance to regulate the use of land and buildings in 1930. A complete re-write was undertaken and the Unified Land Development Code was adopted in 2005. The new code implements the City's growth policy, river corridor plan, neighborhood plans and transportation plan. The purposes of the code are: 1) to ensure that all development is guided by and gives consideration to the Growth Policy; 2) to provide clear, consistent standards, regulations and procedures for the review and approval of all proposed development within the city; and, 3) to safeguard the public health, safety and general welfare by establishing minimum standards for design and development.

The City subjects development applications to subdivision regulations, zoning and land use controls and annexation policies. Such codes and policies are designed to create orderly development; provide adequate services including transportation, utilities, and fire and police protection; and promote public health, safety and general welfare.

Costs for building new housing have greatly increased in recent years but this is due to other factors previously described rather than the cost of meeting code requirements. The City building official reports there is the perception costs of building permits are high and require a time-consuming process. However, the total estimated cost for construction permits to build a house was approximately 1% of the structure's value. The building codes require over-engineered foundations and this may be a significant cost, however, it is necessary because of the clay formation underlying much of the city. The City works with homeowners to educate them on ways to reduce the cost of permitting whenever possible. The time line for permitting is currently a 10 day turnaround time based on approved drawings and there is good accessibility to inspections and access to inspectors. However, the time line for annexation is protracted.

The current zoning and setback requirements can be restrictive for developing affordable housing in situations where developers wish to use odd-size or small lots or construct high density housing as the codes will not allow this. Additionally, no affordable housing incentives such as reduced lot size, set back or building fees are available to developers of affordable housing. Currently, no affordable housing zoning ordinances exist. In order to build homes on small lots, a special process of zoning variance has to be undertaken which often involves a four month process.

Traditionally, mobile/manufactured housing has allowed low income families to purchase housing when a conventional home may be out of reach. However, there is limited availability of vacant affordable single lots, mobile home courts will not accept homes that are older than five years and a zoning change would be required if a new mobile home subdivision were to be developed. There appears to be the demand for an affordable housing option such as improvements to existing mobile/manufactured home parks or development of a new mobile/manufactured home subdivision.

In Montana, property tax is the only way authorized by the legislature for cities to raise money to provide local government service and finance schools. Therefore, the tax burden falls on property owners. The cost of building new housing is also affected by the concept that the user pays. The developer of new housing must pay the full cost of extending water and sewer services, connecting to city utilities and putting in curbs, gutters, sidewalks and paved streets. While these requirements affect the cost of housing, these standards also dictate the quality, permanence, safety and environmental aspects of a community.

MA-45 Non-Housing Community Development Assets

Introduction

The “base economy” of Great Falls includes agriculture and livestock, military, state and federal government, light manufacturing, healthcare, and service industries. The labor force in Great Falls continues to expand at a moderate rate. According to the Bureau of Labor Statistics January 2015 saw an unemployment rate of 5.1%. Unemployment at the time of the 2007-2011 ACS, measured during the duration of the “Great Recession”, measured unemployment at 6%.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	296	67	1	0	-1
Arts, Entertainment, Accommodations	3,622	4,214	16	16	-1
Construction	1,407	1,506	6	6	-1
Education and Health Care Services	4,772	6,510	22	24	3
Finance, Insurance, and Real Estate	1,491	1,937	7	7	1
Information	570	624	3	2	0
Manufacturing	805	896	4	3	0
Other Services	1,034	1,198	5	4	0
Professional, Scientific, Management Services	1,204	1,436	5	5	0
Public Administration	0	0	0	0	0
Retail Trade	3,702	4,746	17	18	1
Transportation and Warehousing	636	650	3	2	0
Wholesale Trade	1,089	1,317	5	5	0
Total	20,628	25,101	--	--	--

Table 40 - Business Activity

Data 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	28,626
Civilian Employed Population 16 years and over	26,900
Unemployment Rate	6.03
Unemployment Rate for Ages 16-24	25.91
Unemployment Rate for Ages 25-65	2.93

Table 41 - Labor Force

Data Source: 2007-2011 ACS

Occupations by Sector	Number of People
Management, business and financial	4,850
Farming, fisheries and forestry occupations	1,066
Service	3,275
Sales and office	7,767
Construction, extraction, maintenance and repair	3,139
Production, transportation and material moving	1,396

Table 42 – Occupations by Sector

Data Source: 2007-2011 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	24,973	93%
30-59 Minutes	1,502	6%
60 or More Minutes	512	2%
Total	26,987	100%

Table 43 - Travel Time

Data Source: 2007-2011 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,326	102	768
High school graduate (includes equivalency)	5,523	291	2,404
Some college or Associate's degree	8,848	402	2,235
Bachelor's degree or higher	5,910	76	1,106

Table 44 - Educational Attainment by Employment Status

Data Source: 2007-2011 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	64	14	111	298	538
9th to 12th grade, no diploma	823	570	391	812	1,181
High school graduate, GED, or alternative	2,048	1,792	1,879	4,582	3,473
Some college, no degree	2,048	2,489	2,065	4,297	2,081
Associate's degree	259	831	945	1,374	366
Bachelor's degree	418	1,477	1,071	2,594	1,207
Graduate or professional degree	31	464	324	1,328	577

Table 45 - Educational Attainment by Age

Data Source: 2007-2011 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	15,996
High school graduate (includes equivalency)	24,627
Some college or Associate's degree	28,040
Bachelor's degree	36,863
Graduate or professional degree	47,195

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2007-2011 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Located within the “Golden Triangle” region of agriculture in Montana, the economic base of the city has long been perceived as a regional center for farming needs and healthcare. Data from [Table 40](#), above, indicated that this Agriculture, Mining, Oil & Gas Extraction business sector employs only 1% of workers within the City limits and 296 jobs. Worker share has slightly declined. Ongoing negotiations between the City, ownership groups and the Great Falls Development Authority are working towards the development of AgriTech Business Park and the Tax Increment Financing (TIF) that goes along with scheduled the area’s improvements.

Education and Health Services contains the largest number of workers (4,772) and jobs (6,510) in Great Falls. This sector has also seen the highest increase in workers percentage (+3%). Retail trade (17% of jobs) and Arts, Entertainment, Accommodations (16% of jobs) create the clear top three employment sectors of the economy at that recorded point in time.

Describe the workforce and infrastructure needs of the business community:

The Great Falls Development Authority (GFDA) is the primary economic development organization in the community and coordinates its activities with organizations such as the City, Cascade County, the Great Falls International Airport Authority, the Great Falls Chamber of Commerce and various educational institutions. The GFDA's mission is to grow and diversify the Great Falls economy and support the creation of high wage jobs.

GFDA is a Community Development Financial Institution and provides a wide variety of financial services, including a Small Business Administration 504 loan program and a USDA Intermediary Relending Program revolving loan fund which are managed through its financing partner, High Plains Financial. The agency will manage an Economic Development Administration loan fund, Environmental Protection Agency Brownfield loan fund, Downtown loan fund and several other state loan funds. At this time the GFDA hosts a Procurement Technical Assistance Center and a Small Business Development Center and anticipates continuing these contracts, dependent on local, state and federal funding.

The GFDA has two revolving loan funds which were allocated CDBG funds in the past to create new jobs for persons from low to moderate income households. In the upcoming year, the agency anticipates the one CDBG-funded loan fund which was financed in part by the Economic Development Agency will receive \$6,900 in income and they will make one loan of approximately \$12,000 from this fund. The agency anticipates the second CDBG-funded loan fund will receive \$5,500 in income and they will make one loan of approximately \$51,000 from this fund.

As more of the population approaches 55 or older there may be shortages of entry level workers and an increase in an aging workforce. According to the 2011-2013 American Community Survey it is estimated that 17,165 individuals are over the age of 55 while the 2010 Census showed that 16,741 individuals were over age 55, a small increase of elderly population by 424.

Travel time is not an issue in the Great Falls community; 93% of workers commute 30 minutes or less. The most current infrastructure concern in 2015 is servicing the AgriTech business park with rail service: negotiations are on-going at this time and construction and maintenance are projected to occur through 2020.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Update: On May 7, 2015 (during the 30-day public review process) technical service company Asurion announced that it will be closing their downtown Great Falls call center. Employment had already been reduced to 248 Great Falls employees, although these employees are

permitted to pursue continued employment from home for Asurion. The employment impact is thus unknown. The loss of density provided by these employees in the City of Great Falls is an enormous challenge. Asurion employees amounted to an estimated 20% of the entire yearly parking revenue from their lease of the two public parking garages in downtown Great Falls.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Based on data provided by the ACS found in Table 49, only 20% of the area workforce has obtained a Bachelor's degree or higher. Great Falls contains two colleges: the private University of Great Falls and public Great Falls College-MSU and are adjacent to one another. Great Falls College participates in *RevUp Montana*, "a partnership between the state's Department of Labor and Industry and many of Montana's two-year colleges. The partnership has created training programs to meet the current and future needs of businesses in two of Montana's key economic sectors" (Great Falls College homepage). The college's four core values include:

1. Workforce Development: Through applied programming our students successfully attain a credential leading to life-sustaining careers.
2. Transfer Preparation: Our students complete transfer programming and successfully transfer toward a four-year degree.
3. Academic Preparation: We prepare individuals for success in college coursework through developmental (remedial) education and adult basic education.
4. Community Development: As the community's college, we support social and economic development through outreach, lifelong learning, and active partnership.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Rural Dynamics, Inc. is the primary financial education resource within the city. RDI's Assets for Montana project will assist families with savings accounts, the use of tax credits, financial education and will expand a website and network of non-profit organizations focused on building assets. RDI will hold financial education workshops and free financial literacy classes and will administer a youth financial literacy program and Montana Foster Child Independence Program. This agency will also provide income tax assistance to help eligible low income people file their federal tax returns and provide matched savings incentive. Families will be provided with financial literacy training, one-on-one counseling and ADD match assistance for down payment.

Opportunities, Inc., will provide a wide variety of programs to assist very low and low income people. The Human Service Resource Center within Opportunities, Inc., will provide emergency services related to food, housing, clothing, eye care, medical care, prescriptions, dental care and transportation. Opportunities, Inc., will administer the following programs which focus on assisting people out of poverty:

1. Family Self-sufficiency Program which teaches participants how to become self-sufficient;
2. Work Force Investment Act Program which provides dropout, low income, at risk and special needs young adults ages 16 through 22 with year round, full-time employment; and
3. HeadStart Program which provides education of preschool-age children, child care, parent education, job training, continuing education, GED preparation, life skills classes, assistance with applying for financial aid for college and coordination with other community services.

Opportunities, Inc., will provide assistance to low income households through the Low Income Energy Assistance Program and the Weatherization Program which gives financial assistance to low income families to help with utility bills, furnace repair/replacement and other energy efficiency services.

The YWCA of Great Falls will offer services that promote self-sufficiency, reduce violence and achieve equal opportunities for people. Services will include life skills training classes and women's health workshops. Vouchers will be available to community service organizations for used clothing.

Young Parents Education Center will provide on-site developmental day care, family support and outreach, pre-vocational activities and parenting/child development education to assist pregnant and parenting teens and young adults to build self-sufficiency.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDs)? If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Sweetgrass Development is a private, non-profit corporation created in 2004 to support economic development in the counties of Glacier, Cascade, Pondera, Teton and Toole, as well as the Blackfeet Nation. It is diverse area that includes a large metropolitan area (Great Falls), small towns, rural farming areas, several Hutterite Colonies and the Blackfeet Reservation.

Discussion

The most recent CEDs document associated with Sweetgrass Development was developed in 2012 covering the 2012-2017 planning years. The Executive Summary of this document acknowledges weaknesses in the economic diversity of the region as well as strengths anchored by Great Falls as the area's largest city. These findings include:

The principle strengths of the region are: a relatively high education rate and above average earnings per job and per capita income. The region is economically diverse, has a low

unemployment rate and a willing workforce . There is a metropolitan area within the Sweetgrass region, which is reasonably accessible to most communities. Road and rail transportation is adequate. There also exists a high quality of life in the Sweetgrass region, which citizens value and wish to protect. There are identifiable local businesses that can act as models of success and a high level of locally invested citizens eager to contribute to a prosperous future.

The weaknesses of the region are: an overall increase in the unemployment rate from 1990 to 2010 (between 2005 and 2010 the region witnessed the largest spike on average in the unemployment rate). In most counties, with the exception of Cascade and Teton, there is too much reliance on relatively lower wage tourism-related service sectors and not enough growth in the high-wage services, such as information, financial, and health services. In spite of good highways, three of the five counties (those with the lowest wage service industries), are isolated from major population centers and therefore cannot readily access a commercial airport. Agriculture, historically the most important industry, has not generated new jobs or income in recent years. Many counties within the region are experiencing high rates of drug use and an outflow of youth to more urban areas. Some communities do not have a skilled workforce able to compete for higher wage jobs.

The Sweetgrass region as a whole will benefit from economic diversification, which will provide greater resilience for communities and a broader array of opportunities to individuals. Exploring high-wage service sectors and value-added agriculture should be a significant component of this diversification. It is equally important to develop a set of financial tools and resources for entrepreneurs in the region. Job training, as well as advanced educational opportunities, will be crucial to retaining area youth and positioning the region’s labor force to compete successfully in higher wage enterprises. (2012-2017 Comprehensive Economic Development Strategy)

Top 10 Private Employers in Great Falls

Rank	Employer	Private Sector	
		Business Type	Employees
1.	Benefis Healthcare	Hospital	2,732
2.	Asurion	Warranty/Service Plans	552
3.	Walmart Stores	Retailer	475
4.	Great Falls Clinic	Services for Disabilities	407
5.	Easter Seals-Goodwill	Construction	305
6.	Centene	Insurance	319
7.	Albertsons	Grocery Store	280
8.	University of Great Falls	University	229
9.	Missouri River Care	Nursing and Rehabilitation	225
10.	Davidson Companies	Financial Services/Travel	224

Source: "2014 The Great Falls Chamber of Commerce Community Guide"

Top Private Employers 2014

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

City efforts are concentrated in areas that are over 51% Low to Moderate Income as defined by HUD. Using information from the 2010 U.S. Census, there are seven census tracts that fit this definition, all adjacent to one another: tracts 4, 7, 8, 9, 16, 21, and 108, respectively. The city rehabilitation specialist and code enforcement specialist operate exclusively in this area as required for the use of CDBG funds.

The City of Great Falls is over 87.5% White according to the 2011-2013 ACS. Other races account for around 5% or less for nonwhite races, with American Indian or Alaska Native amounting to the second largest percentage at 5.4%. Asian is 1% and Black or African American is less than 1%. Hispanic or Latino of any race amounts for 4.3%

Based upon the tables below, calculation has found that disproportionately greater needs to exist among certain racial or ethnic groups based on housing problems despite their small percentage of the population. Disproportionately greater need is defined by being at least 10% larger than the total income level (all races combined).

For 0%-30% AMI:

- **76.7%** of extremely low income residents have one or more of the four housing problems provided, but all ten (**100%**) of Asian residents in this AMI range suffer from one or more housing problems.

For 30%-50% AMI:

- **60.2%** of low income residents have one or more of the four housing problems provided, but **75%** of Native American and nearly **93%** of Hispanic residents suffer from one or more housing problems.

For 50%-80% AMI:

- **51.5%** of moderate income residents has one or more of the four housing problems provided, but **71.4%** of Hispanic residents suffer from one or more housing problems

For 80%-100% AMI:

- **22.1%** of residents has one or more of the four housing problems provided, but **41.1%** of Hispanic residents suffer from one or more housing problems

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

City efforts are concentrated in areas that are over 51% Low to Moderate Income as defined by HUD. Using information from the 2010 U.S. Census, there are seven census tracts that fit this definition, all adjacent to one another: tracts 4, 7, 8, 9, 16, 21, and 108, respectively. The city rehabilitation specialist and code enforcement specialist operate exclusively in this area as required for the use of CDBG funds.

HUD MINORITY NEIGHBORHOOD: A neighborhood in which the percentage of persons of a particular racial or ethnic minority is at least 20 points higher than that minority's percentage in the housing market as a whole; the neighborhood's total percentage of minority persons is at least 20 points higher than the total percentage of minorities for the housing market area as a whole; or in the case of a metropolitan area, the neighborhood's total percentage of minority persons exceeds 50 percent of its population.

The most racially-diverse census tract in the region is Tract 12 which is almost entirely outside of city limits and includes Malmstrom Air Force Base. The next two Tracts of racial diversity, using the CPD Maps tool, are tracts 8 and 9 but the White population still accounts for over 90% of the population in these tracts. Both tracts are within HUD Low to Moderate income areas (greater than 51% LMI). There are no census tracts in the City Great Falls that would qualify as an area of minority concentration.

What are the characteristics of the market in these areas/neighborhoods?

Census tracts 108, 7, 8, and 9 are all designated as Low to Moderate Income areas, and all at some point were include as part of a HUBZone (Tract 8 has been reclassified). Census Tract 108 contains the city's main historic main street, Central Avenue and the Central Business Historic District as recognized as a National Register Historic District by the National Park Service. Quoting the U.S. Small Business Administration website:

The program encourages economic development in historically underutilized business zones - "HUBZones" - through the establishment of preferences. SBA's HUBZone program is in line with the efforts of both the Administration and Congress to promote economic development and employment growth in distressed areas by providing access to more federal contracting opportunities.

Are there any community assets in these areas/neighborhoods?

Census Tract 108 contains the city's "main street", Central Avenue, and the Central Business Historic District as recognized as a National Register Historic District by the National Park Service. Tract 108 also contains the Great Falls Railroad District (extending south into Tract 7),

Great Falls Northside Residential District and the city's two central parks, Gibson Park and Riverside Park. The Great Falls Housing Authority's main site is located in Tract 9.

The Great Falls Business Improvement District (BID) has focused its activities on façade and interior building improvements; cleaning, maintenance and beautification; new business activity; and residential development in the downtown area. BID provides facade improvement, outdoor art projects, interior/new business activity, business incentive and residential grant funds at the maximum amount available in the upcoming year. They have a community ambassador program and carry out numerous public art installations and projects. BID will be part of the Downtown Business Watch program which educates people about various safety issues.

The BID will coordinate efforts with organizations such as the City, the GFDA, Chamber of Commerce, Downtown Great Falls Association and NHS for business development and revitalization of the downtown area.

The City historic preservation officer and the Great Falls-Cascade County Historic Preservation Advisory Commission will promote the use of investment tax credits for certified rehabilitation and the use of the Uniform Code for Building Conservation as tools for revitalization of the downtown area. The City will be an active member of the Downtown Development Partnership and will work to incentivize downtown revitalization. The City will also promote the National Register sign register program and other historic signage programs to promote tourism.

Are there other strategic opportunities in any of these areas?

The Downtown Master Plan was adopted in October 2011 in an effort to revitalize several tracts within the downtown core and to consolidate revitalization efforts among interests groups within the city, including the City, nonprofit agencies and community leaders. The Downtown Master Plan Study area extends fifteen blocks east of the river and encompasses portions of tracts 4, 7, 8, and 108. The Plan was developed around four community Working Groups:

Vitality: Downtown's role as the center of commerce, culture, and community events - year-round, throughout the day and into the night.

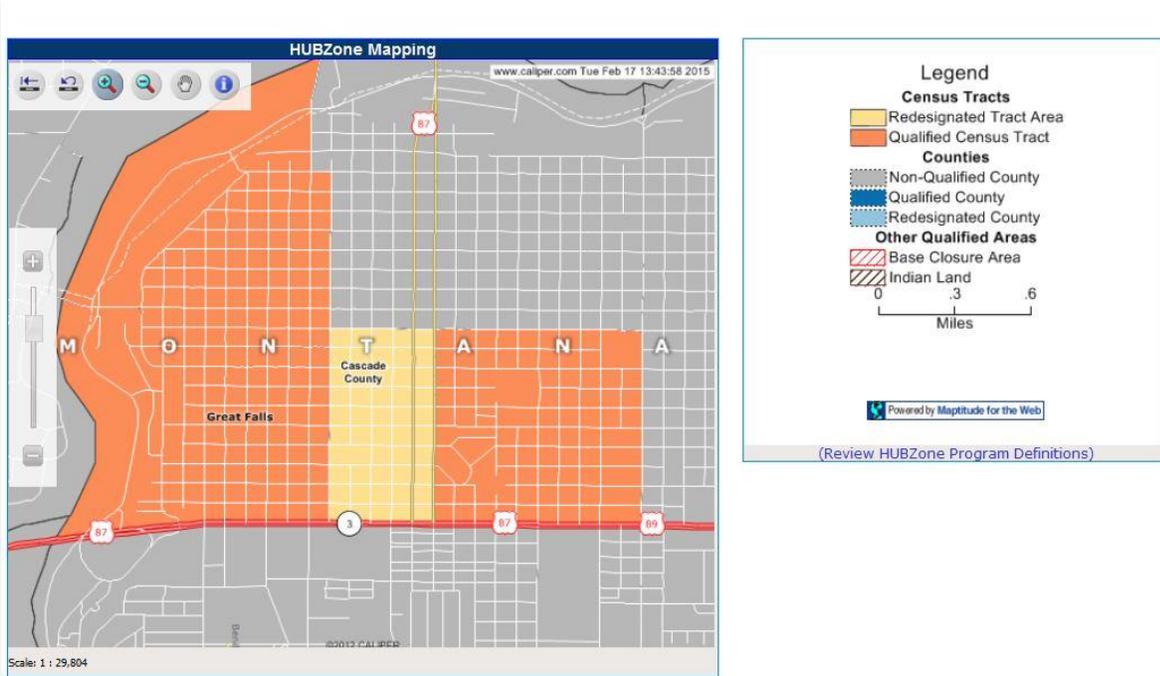
Livability: the enrichment of the physical, social, and personal well being of Downtown residents, employees, and visitors.

Character: the physical elements that create a unique sense of place that distinguishes the Downtown area from other parts of the city.

Mobility: the ability of residents, employees, and visitors to have the option of using multiple modes of transportation to reach Downtown destinations in a safe and efficient manner.

These working groups later comprised the Downtown Development Partnership, an inter-agency cooperative group which meets bi-monthly to discuss issues specific to this area.

The Montana Main Street program, through the Montana Department of Commerce, awards grants to affiliate communities (which include Great Falls) upon providing a quarterly Community Reinvestment Report. All activities within the Downtown Master Plan area are included and consist of all building rehabilitations, volunteer activities, and new businesses.



HUBZone Great Falls

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The five year strategic plan was developed to coordinate the needs of the community and available resources to meet the following basic goals central to performance measurement requirements and set forth in the statutes of the CDBG and HOME grant programs:

- provide decent housing for low and moderate income people
- provide a suitable living environment for low and moderate income people
- expand economic opportunity principally for low and moderate income people

Priorities have also been developed in coordination with the goals the City Commission has identified, which include the following:

- develop a visually appealing and culturally rich community
- manage growth to preserve our resources, environment and sense of community
- provide excellent public services desired by the community within its financial means
- strengthen and diversify our economy to provide job opportunities
- anticipate future service needs, costs and resources and plan ahead to address them
- form partnerships with other governments and organizations to make better use of public resources in providing services
- ensure open and accessible government
- build a stronger team of staff, elected officials and citizens by transforming our organization to meet the change needs of the community
- remain financially strong
- provide leisure and recreation opportunities which add to our quality of life

The five year strategy is designed to address areas of greatest need through a systematic process. Beginning as early as September 2007 the City helped to initiate a community-wide effort to undertake a combined comprehensive housing affordability strategy and community development needs assessment. This process began with facilitated group discussions about community needs, which lead to working groups being formed, one of which focused on undertaking a comprehensive housing and community development needs assessment and developing a comprehensive strategy to assure affordable housing needs will be met. When considering needs, all community needs were considered, including such areas as infrastructure, public services, public facilities and economic development in order to obtain comprehensive information for the Consolidated Plan. However, it should be noted the strategies developed as part of the CHAS focus on housing needs only.

After compiling the survey results, from October 2008 through April 2009 the working group held 15 weekly focus group sessions to determine the extent and character of the needs identified through the surveys. Following the surveys and focus groups, a working group produced a list of 17 housing needs. This information was presented to the entire CHAS group for discussion, prioritization and adoption. In February 2009 the full planning group identified 16 strategies to address the needs. From the beginning of the CHAS process, the planning group was considering housing needs of people with low to moderate income, as well as housing for the work force which roughly includes those at 80% to 120% of area median income. As a result, some of the 17 strategies will not fit within the parameters of what can be undertaken with HUD funding. Out of these 17 strategies, **seven** were prioritized for adoption in the CHAS as the 2010-2020 Housing Plan (See Appendix B)

SP-10 Geographic Priorities

Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	City of Great Falls
	Area Type:	municipality
	Other Target Area Description:	municipality
	% of Low/ Mod:	n/a
	Revital Type:	Jurisdiction
	Other Revital Description:	n/a
	Identify the neighborhood boundaries for this target area.	Jurisdiction
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	n/a
	Identify the needs in this target area.	See MA
	What are the opportunities for improvement in this target area?	n/a
	Are there barriers to improvement in this target area?	n/a

General Allocation Priorities

City efforts are concentrated in areas that are over 51% Low to Moderate Income as defined by HUD. Using information from the 2010 U.S. Census, there are seven census tracts that fit this definition, all adjacent to one another: tracts 4, 7, 8, 9, 16, 21, and 108, respectively. The city rehabilitation specialist and code enforcement specialist operate exclusively in this area as required for the use of CDBG funds. Great Falls is not racially diverse and no areas of minority concentration currently exist within city limits.

Describe the basis for allocating investments geographically within the jurisdiction

The City of Great Falls focuses on Low to Moderate Income residents regardless of geographic location. There are no areas of minority concentration within the city. However, local agency participation in a March 3, 2015 Community Input meeting involved asking attendees to place a green dot on one area of the city where needs could be best addressed/targeted. All dots were located in their Original Townsite region near downtown, with the majority of dots located within a three block radius south of downtown. While not a scientific basis for determining Geographic Allocation Priorities, it provided citizen input to where many housing agencies in the community feel efforts should be targeted.

SP-25 Priority Needs

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Public Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	municipality
	Associated Goals	Public Improvements
	Description	Provide public facility and infrastructure assistance including handicap accessibility and energy efficiency improvements to provide a suitable living environment.
	Basis for Relative Priority	2010-2020 Comprehensive Housing Affordability Study: conducted a Needs Assessment (based upon focus groups, interviews, surveys), a December 2014 CDBG community needs meeting and March 2015 Consolidated Plan Community Input agency meeting. Needs were identified by agencies and citizens represented by this group. Attendees to the latter meeting were asked about goals from the previous 2010-2015 Consolidated Plan goals and if these goals were still applicable to the community or needed revised/removed.

2	Priority Need Name	Transitional Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	municipality
	Associated Goals	Transitional Housing
	Description	Provide assistance for transitional housing with supportive services benefitting homeless or special needs persons.
	Basis for Relative Priority	2010-2020 Comprehensive Housing Affordability Study: conducted a Needs Assessment (based upon focus groups, interviews, surveys), a December 2014 CDBG community needs meeting and March 2015 Consolidated Plan Community Input agency meeting. Needs were identified by agencies and citizens represented by this group. Attendees to the latter meeting were asked about goals from the previous 2010-2015 Consolidated Plan goals and if these goals were still applicable to the community or needed revised/removed.
3	Priority Need Name	Public Services
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	municipality
	Associated Goals	Public Services
	Description	Provide support to public service agencies operating programs that benefit low to income persons.
	Basis for Relative Priority	2010-2020 Comprehensive Housing Affordability Study: conducted a Needs Assessment (based upon focus groups, interviews, surveys), a December 2014 CDBG community needs meeting and March 2015 Consolidated Plan Community Input agency meeting. Needs were identified by agencies and citizens represented by this group. Attendees to the latter meeting were asked about goals from the previous 2010-2015 Consolidated Plan goals and if these goals were still applicable to the community or needed revised/removed.
4	Priority Need Name	Homeownership
	Priority Level	Low

	Population	Extremely Low Low Moderate Large Families Families with Children Public Housing Residents Families with Children veterans Persons with HIV/AIDS and their Families
	Geographic Areas Affected	municipality
	Associated Goals	Homeownership
	Description	Provide direct first-time homebuyer assistance for low to moderate income families.
	Basis for Relative Priority	2010-2020 Comprehensive Housing Affordability Study: conducted a Needs Assessment (based upon focus groups, interviews, surveys), a December 2014 CDBG community needs meeting and March 2015 Consolidated Plan Community Input agency meeting. Needs were identified by agencies and citizens represented by this group. Attendees to the latter meeting were asked about goals from the previous 2010-2015 Consolidated Plan goals and if these goals were still applicable to the community or needed revised/removed.
5	Priority Need Name	Housing Rehabilitation
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	municipality
	Associated Goals	Housing Rehabilitation
	Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners and property owners with very low to moderate income renters to upgrade the city housing stock to provide safe, affordable housing.
	Basis for Relative Priority	2010-2020 Comprehensive Housing Affordability Study: conducted a Needs Assessment (based upon focus groups, interviews, surveys), a December 2014 CDBG community needs meeting and March 2015 Consolidated Plan Community Input agency meeting. Needs were identified by agencies and citizens represented by this group. Attendees to the latter meeting were asked about goals from the previous 2010-2015 Consolidated Plan goals and if these goals were still applicable to the community or needed revised/removed.
6	Priority Need Name	Fair and Affordable Rental Housing
	Priority Level	High

	Population	Extremely Low Low Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	municipality
	Associated Goals	Fair Housing
	Description	Provide decent affordable housing opportunities for very low and low income renters, particularly the elderly and/or disabled.
	Basis for Relative Priority	2010-2020 Comprehensive Housing Affordability Study: conducted a Needs Assessment (based upon focus groups, interviews, surveys), a December 2014 CDBG community needs meeting and March 2015 Consolidated Plan Community Input agency meeting. Needs were identified by agencies and citizens represented by this group. Attendees to the latter meeting were asked about goals from the previous 2010-2015 Consolidated Plan goals and if these goals were still applicable to the community or needed revised/removed.
7	Priority Need Name	Economic Development
	Priority Level	Low

Population	Extremely Low Low Moderate Middle Large Families Families with Children Public Housing Residents Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
Geographic Areas Affected	municipality
Associated Goals	Economic Development
Description	Provide funding to projects that will create decent paying jobs with benefits for persons from low to moderate income households
Basis for Relative Priority	2010-2020 Comprehensive Housing Affordability Study: conducted a Needs Assessment (based upon focus groups, interviews, surveys), a December 2014 CDBG community needs meeting and March 2015 Consolidated Plan Community Input agency meeting. Needs were identified by agencies and citizens represented by this group. Attendees to the latter meeting were asked about goals from the previous 2010-2015 Consolidated Plan goals and if these goals were still applicable to the community or needed revised/removed.

Narrative

Priorities, objectives and strategies were developed by a consideration of the needs assessment, consideration of the housing and homeless inventory and an analysis of CDBG and HOME funded activities. It also included unmet needs for the past five years. All the priorities and objectives identified in the following five year strategic plan are consistent with the strategies identified in the CHAS. They are also consistent with the City Commission goals as identified in the Strategic Plan Overview section.

It must be kept in mind, historically, there have been competing interests requesting a large amount of CDBG and HOME financial assistance from a limited availability of funds. The City anticipates this situation will continue throughout the next five year period.

All priorities were established based on high needs and none are higher than another.

- Provide public facility and infrastructure assistance including American with Disabilities Act (ADA) handicap accessibility and energy efficiency improvements to provide a suitable living environment
- Provide assistance for transitional housing with supportive services benefiting homeless or special needs persons
- Provide support to public service agencies operating programs that benefit low income persons
- Provide direct first-time homebuyer assistance for low to moderate income families
- Provide construction and rehabilitation assistance for very low to moderate income homeowners and landlords with very low to moderate income renters to upgrade the city housing stock to provide and sustain safe, affordable housing
- Provide decent affordable housing opportunities for very low and low income renters, particularly the elderly and/or disabled
- Provide funding to projects which will create decent paying jobs with benefits for persons from low to moderate income households

SP-30 Influence of Market Conditions

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Based on ACS data provided by HUD, the rental market in Great Falls provides numerous rental units under \$500; however rents are high in comparison to the quality and supply of safe, affordable housing. As of 2014-2015 Opportunities, Inc., provides rental assistance and have a security deposit revolving account to assist low income households who are renting.
TBRA for Non-Homeless Special Needs	Based on ACS data provided by HUD, the rental market in Great Falls provides numerous rental units under \$500; however rents are high in comparison to the quality and supply of safe, affordable housing. As of 2014-2015 the Young Parents Educational Center provides limited emergency rental assistance.
New Unit Production	<p>In 2014-2015, the CBDO NeighborWorks (NHS) anticipated receiving \$50,000 in HOME program income from new construction (Owners in Partnership programs) and \$75,000 in HOME program income from down payment and closing cost assistance loans. The City anticipated receiving no program income from a City HOME loan.</p> <p>For 2015-2016 one project, NHS – Affordable Housing Program will be exclusively funded by HOME program funds to new construction and/or rehabilitation of rental units.</p>
Rehabilitation	<p>CDBG funding on a yearly project basis will continue to be used for the City's housing rehabilitation programs, administered through Neighborhood Housing Services, Inc. (NeighborWorks Great Falls). The city will continue to act as the applicant for these funds.</p> <p>2015-2016 Priority Need: Provide construction and rehabilitation assistance for very low to moderate income homeowners and landlords with very low to moderate income renters to upgrade the City housing stock to provide and sustain safe, affordable housing. Provide decent affordable housing opportunities for very low and low income renters, particularly the elderly and/or disabled.</p> <p>As of FY 2016 NeighborWorks Great Falls (formerly the City rehabilitation specialist) will administer the CDBG-funded Rental Improvement and Water & Sewer loan programs to provide housing rehabilitation and utility line assistance to property owners who agree to keep rents affordable for a specific period; and 2) the City code enforcement specialist will provide services to preserve and enhance public health and safety by enforcing international and city codes related to property and building maintenance.</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	The Great Falls-Cascade County Historic Preservation Advisory Commission (HPAC) is the strongest advocate for building preservation within the Great Falls region. The primary purpose of HPAC is to advise the local governments on matters of preservation and to ensure that historic preservation is considered at all levels of City and County decision-making, and is incorporated in projects throughout the area. HPAC provides technical assistance and grants for preservation of area resources but has not purchased property in the recent past.

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources

Introduction

All staff activities used in creating the Consolidated Plan is provided from 20% of CDBG funds allotted for Administrative spending.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	715,840	300,000	74,000	1,089,840	2,800,000	CDBG funds are anticipated to be \$700,000 annually for the program years 2016-2020
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	191,970	150,000	193,527	535,497	760,000	HOME funds are anticipated to be \$190,000 annually for the program years 2016-2020

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
General Fund	public - local	Admin and Planning Public Improvements Public Services	26,758,998	0	0	26,758,998	107,035,992	Based on 2015 budget.

Table 50 - Anticipated Resources

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

Federal funding will be leveraged with the support of local and regional outside (private) sources of funding as well as state and local funds. When evaluating yearly allocations of CDBG funding to grant applications, the Community Development Council (citizen volunteers) use the criteria of sustainability when selecting applicant awards. This is defined as the ability for the funded program to sustain itself by reducing and/or eliminating future CDBG funds and also in its ability to match federal dollars with other funding sources. Other key criteria used by the CDC in selecting projects for federal funding is its ability to reach the largest audience of LMI individuals and providing services to underserved communities i.e. avoiding service duplication. Both CDBG and HOME projects can maximize local impact with leveraged local resources among area providers.

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

A strong example of using publically owned land to address low to moderate income needs is the Westside Orchard Garden, located on public parkland called Community Hall Park. It is found within a LMI Census Tract (16) at 400 16th St NW Great Falls, MT. Sunburst Unlimited temporarily uses the land and opened Westside Orchard Garden in the spring of 2013 with the help of CDBG funding. Food grown in the garden is donated for local consumption for residents within the LMI tract, the Boys and Girls Club, and Meals on Wheels for elderly residents.

SP-40 Institutional Delivery Structure

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Great Falls	Government	Economic Development Non-homeless special needs Planning Rental neighborhood improvements public facilities public services	Jurisdiction
GREAT FALLS DEVELOPMENT AUTHORITY	PHA	Public Housing	Jurisdiction

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City is a public entity whose purpose relative to housing and other categories pertinent to CDBG and HOME grant funding involve such areas as planning, financing, code enforcement, zoning enforcement, building inspection, plan review and overall community development. The City's financial resources for assistance are the CDBG and HOME programs. In addition to having its own housing programs, the City allocates federal funds to housing and non-profit agencies to address housing, economic development, public facility and public services issues. The programs are administered through the Planning & Community Development Department with support, as necessary, from other departments within the City of Great Falls. Policy oversight is provided by the City Commission. Administrative oversight is provided by the City's department director and the city manager.

The City works in conjunction with the various entities described in the previous section (such as local housing, community development and social service providers) and groups such as the Continuum of Care for Homelessness and Great Falls Housing Task Force to insure the Consolidated Plan accurately reflects the needs of the community. The CDC provides application funding recommendations and the City Commission makes the final decision on the direction the City will take to meet the needs identified in the Consolidated Plan.

Availability, homeless and people with HIV have clear gaps in services. However gaps evident in HIV persons are partially due to the low level of HIV/AIDS population currently in Great Falls.

The jurisdiction does not currently receive HOPWA funding, and City-County Health Services provides health and treatment related services to those with HIV rather than providing housing assistance as HOPWA is intended. Gaps in homeless may be explained by the Great Falls Rescue Mission being the primary provider of homeless services in the community. They are planning a large expansion (100+ beds) for their facilities in 2015 but are based almost exclusively on donations. As a faith-based organization, the Rescue Mission prefers not to accept federal funding for their projects, thus no CDBG funds have been used for their general purpose.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The City is a public entity whose purpose relative to housing and other categories pertinent to CDBG and HOME grant funding involve such areas as planning, financing, code enforcement, zoning enforcement, building inspection, plan review and overall community development. The City's financial resources for assistance are the CDBG and HOME programs. In addition to having its own housing programs, the City allocates federal funds to housing and non-profit agencies to address housing, economic development, public facility and public services issues. The programs are administered through the Planning & Community Development Department with support, as necessary, from other departments within the City of Great Falls. Policy oversight is provided by the City Commission. Administrative oversight is provided by the City's department director and the city manager.

The City works in conjunction with the various entities described in the previous section (such as local housing, community development and social service providers) and groups such as the Continuum of Care for Homelessness and Great Falls Housing Task Force to insure the Consolidated Plan accurately reflects the needs of the community. The CDC provides application funding recommendations and the City Commission makes the final decision on the direction the City will take to meet the needs identified in the Consolidated Plan.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The various entities previously described have a history of collaboration with the City in seeking to meet the needs of low income and at-risk populations. This collaboration has become increasingly crucial as funding resources have decreased at most governmental levels. The City anticipates being able to implement the programs/projects proposed in the Consolidated Plan unless federal funds become unavailable, reduced or delayed for a substantial period of time. From the City's viewpoint, the major weakness in the Consolidated Plan is the lack of sufficient funding available to adequately address all the priorities simultaneously. However, this problem is beyond the control of the City.

Locally, the turnover of some agency leadership due to lack of available funding or retirement will provide a gap in experience and knowledge in the local workforce. Mentorship and replacing these key community leaders is essential for maintaining current level of service.

Based upon Table 52: Assess of Strengths and Gaps in the Institutional Delivery System

Availability, homeless and people with HIV have clear gaps in services. However gaps evident in HIV persons are partially due to the low level of HIV/AIDS population currently in Great Falls.

The jurisdiction does not currently receive HOPWA funding, and City-County Health Services provides health and treatment related services to those with HIV rather than providing housing assistance as HOPWA is intended. Gaps in homeless may be explained by the Great Falls Rescue Mission being the primary provider of homeless services in the community. They are planning a large expansion (100+ beds) for their facilities in 2015 but are based almost exclusively on donations. As a faith-based organization, the Rescue Mission prefers not to accept federal funding for their projects, thus no CDBG funds have been used for their general purpose.

SP-45 Goals Summary

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Improvements	2016	2020	Public Housing Non-Homeless Special Needs Non-Housing Community Development	City of Great Falls	Public Improvements	CDBG: \$840,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100 Households Assisted
2	Transitional Housing	2016	2020	Homeless Non-Homeless Special Needs	City of Great Falls	Transitional Housing	CDBG: \$280,000	Public service activities other than Low/Moderate Income Housing Benefit: 5200 Persons Assisted
3	Public Services	2016	2020	Non-Homeless Special Needs Non-Housing Community Development	City of Great Falls	Public Services	CDBG: \$356,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeownership	2016	2020	Affordable Housing	City of Great Falls	Homeownership	CDBG: \$130,000 HOME: \$184,000	Homeowner Housing Added: 50 Household Housing Unit Homeowner Housing Rehabilitated: 75 Household Housing Unit Direct Financial Assistance to Homebuyers: 25 Households Assisted
5	Housing Rehabilitation	2016	2020	Affordable Housing	City of Great Falls	Housing Rehabilitation	CDBG: \$420,000 HOME: \$500,000	Rental units rehabilitated: 75 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 700 Household Housing Unit
6	Fair Housing	2016	2020	Affordable Housing	City of Great Falls	Fair and Affordable Rental Housing	CDBG: \$140,000	Rental units constructed: 8 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 200 Household Housing Unit
7	Economic Development	2016	2020	Non-Housing Community Development Economic Development	City of Great Falls	Economic Development	CDBG: \$150,000	Jobs created/retained: 15 Jobs Businesses assisted: 10 Businesses Assisted

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Public Improvements
	Goal Description	Provide public facility and infrastructure assistance including handicap accessibility and energy efficiency improvements to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. Other activities that will be funded will primarily address structural deficiencies and basic code upgrades for public facilities and non-profit agencies that serve the general population.
2	Goal Name	Transitional Housing
	Goal Description	Provide assistance for transitional housing with supportive services benefitting homeless or special needs persons. Over the next five years, the City of Great Falls will fund qualified projects to construct or rehabilitate transitional housing with supportive services for the homeless, homeless youth, young parents under the age of 18 years, homeless single head of household families who do not meet criteria for public housing, victims of abuse and others.
3	Goal Name	Public Services
	Goal Description	Provide support to public service agencies operating programs that benefit low income persons. Over the next five years the City of Great Falls will provide funds to social service agencies to fund scholarships for child and youth day care/recreational/educational programs, purchase food for elderly home meal delivery program and other activities for the provision of services to low income people.
4	Goal Name	Homeownership
	Goal Description	Provide direct first-time homebuyer assistance to low to moderate income families. Partner agencies have included NeighborWorks Great Falls and Habitat for Humanity using HOME and non-HOME funding.

5	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners or property owners with very low to moderate income renters to upgrade the city housing stock to provide and sustain safe, affordable housing. The City of Great Falls, administered through the nonprofit Neighborhood Housing Services, Inc. (NeighborWorks Great Falls), will provide loans to low income homeowners through the Deferred Payment Loan program. The City of Great Falls, administered through the nonprofit Neighborhood Housing Services, Inc. (NeighborWorks Great Falls), will provide loans to property owners to rehabilitate rental units that will be rented to low income people through the Rental Improvement program.
6	Goal Name	Fair Housing
	Goal Description	Provide affordable housing opportunities for very low and low income renters, particularly the elderly and/or disabled. The City of Great Falls will continue to provide non-profit, social service agencies CDBG funds to rehabilitate and subsidize rental housing for the elderly and/or disabled. Project-based rental assisted housing providers should apply for housing upgrades using CDBG dollars (Community Development Council) when available.
7	Goal Name	Economic Development
	Goal Description	Provide funding for projects which create decent paying jobs with benefits for persons from low to moderate income households. The City of Great Falls will fund economic development projects which will result in the creation of jobs for low to moderate income people. Such projects will include funding to the Great Falls Development Authority (GFDA) revolving loan fund to provide gap financing to existing and start-up businesses to create new jobs for low to moderate income people. Economic Development was recently allocated 10% of CDBG dollars in FY 2015 and this allocation is predicted to continue through the next five years.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City of Great Falls estimated the number of LMI families that would be provided as part of the Strategic Plan and Executive Summary Portion of the 2010-2015 Consolidated Plan. This was estimated, through nonprofit partner agencies:

- Construction and rehabilitation of transitional housing (16 units)
- Assistance to first-time home buyers (46 buyers)
- Housing site work (15)
- Deferred Payment Loan (50)
- Rental Improvement Program (140)
- Water and Sewer Program (9)
- New public housing construction (16) Specifically for elderly and/or disabled (30+40 rehab)

This amounts to approximately 363 households served, not including current services provided in subsidized housing.

Previous activity and anticipated resources, despite the decrease in yearly CDBG and HOME federal funding sources, is projected to continue in a similar manner to previous services. Four of the seven new Goals for 2015-2019 involve housing. Affordable housing is projected for 33 households in year one; conservatively, at least 165 non-homeless households will be supported with additional 27 special needs and non-homeless households supported each year (135). Three hundred households are projected to be served.

SP-50 Public Housing Accessibility and Involvement

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable.

Activities to Increase Resident Involvements

At least one member of Planning and Community Development staff attend a Housing Task Force agency coordination meeting to update partner agencies in housing needs, discuss problems or concerns in current operations, and highlight current projects. Involved agencies include governmental agencies including the Housing Authority, nonprofit housing developers, service providers, developers, and representatives from the adjacent Malmstrom Air Force base, which has significant impact on the local rental market.

The Fair Housing Coordinator and Housing Authority Director are major contributors to resident involvement including noting all resident concerns and complaints at the Task Force events, while many agency nonprofits provide down-payment/loan assistance, job training services (Easter Seals-Goodwill) and the marketing of these services while referring residents to their options within other Task Force members to remove barriers to fair housing.

Is the public housing agency designated as troubled under 24 CFR part 902?

No.

Plan to remove the 'troubled' designation

Not applicable. The Great Falls Housing Authority is not currently designated as troubled.

SP-55 Barriers to affordable housing

Barriers to Affordable Housing

Great Falls first adopted a zoning ordinance to regulate the use of land and buildings in 1930. A complete re-write was undertaken and the Unified Land Development Code was adopted in 2005. The new code implements the City's growth policy, river corridor plan, neighborhood plans and transportation plan. The purposes of the code are: 1) to ensure that all development is guided by and gives consideration to the Growth Policy; 2) to provide clear, consistent standards, regulations and procedures for the review and approval of all proposed development within the city; and, 3) to safeguard the public health, safety and general welfare by establishing minimum standards for design and development.

The City subjects development applications to subdivision regulations, zoning and land use controls and annexation policies. Such codes and policies are designed to create orderly development; provide adequate services including transportation, utilities, and fire and police protection; and promote public health, safety and general welfare.

Costs for building new housing have greatly increased in recent years but this is due to other factors previously described rather than the cost of meeting code requirements. The City building official reports there is the perception costs of building permits are high and require a time-consuming process. However, the total estimated cost for construction permits to build a house was approximately 1% of the structure's value. The building codes require over-engineered foundations and this may be a significant cost, however, it is necessary because of the clay formation underlying much of the city. The City works with homeowners to educate them on ways to reduce the cost of permitting whenever possible. The time line for permitting is currently a 10 day turnaround time based on approved drawings and there is good accessibility to inspections and access to inspectors. However, the time line for annexation is protracted.

The current zoning and setback requirements can be restrictive for developing affordable housing in situations where developers wish to use odd-size or small lots or construct high density housing as the codes will not allow this. Additionally, no affordable housing incentives such as reduced lot size, set back or building fees are available to developers of affordable housing. Currently, no affordable housing zoning ordinances exist. In order to build homes on small lots, a special process of zoning variance has to be undertaken which often involves a four month process.

Traditionally, mobile/manufactured housing has allowed low income families to purchase housing when a conventional home may be out of reach. However, there is limited availability of vacant affordable single lots, mobile home courts will not accept homes that are older than five years and a zoning change would be required if a new mobile home subdivision were to be developed. There appears to be the demand for an affordable housing option such as improvements to existing mobile/manufactured home parks or development of a new mobile/manufactured home subdivision.

In Montana, property tax is the only way authorized by the legislature for cities to raise money to provide local government service and finance schools. Therefore, the tax burden falls on property owners. The cost of building new housing is also affected by the concept that the user pays. The developer of new housing must pay the full cost of extending water and sewer services, connecting to city utilities and putting in curbs, gutters, sidewalks and paved streets. While these requirements affect the cost of housing, these standards also dictate the quality, permanence, safety and environmental aspects of a community.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The foundation for the City's fair housing program is the Analysis of Impediments to Fair Housing Choice 2015—2019 (AI) which was completed in April 2015 and updated yearly, the last update occurring in March 2014. This document includes a detailed description of the six impediments which were identified and the activities which will be undertaken in the upcoming year to address overcoming the effects of each impediment (see Appendix F).

In 2014, the City used CDBG funds in the following ways to address the impediments identified in the Analysis of Impediments to Fair Housing:

The City will ensure compliance with the Fair Housing Act and many of these activities will address each of the impediments identified in the AI.

The impediment which addresses the lack of quality housing for low income renters will be addressed through the use of 2014/2015 CDBG funds in the following projects: 1) The City will administer the CDBG-funded Rental Improvement and Water & Sewer loan programs to provide housing rehabilitation and utility line assistance to property owners who agree to keep rents affordable for a specific period; and 2) the City's code enforcement specialist will provide services to preserve and enhance public health and safety by enforcing international and city codes related to property and building maintenance.

The impediment which addresses the lack of subsidized housing for the elderly and disabled will be addressed through the use of HOME funds by Accessible Space, Inc., to develop a 38 unit subsidized accessible apartment complex for the elderly and frail elderly.

As part of fair housing outreach and education activities, the City will distribute pamphlets about fair housing, landlord and tenant law, accessibility guidelines and HUD programs community-wide, free of charge. Current information will be available on the City's and Housing Authority's Internet sites. Education programs will be presented at NHS, the Great Falls Realtors Association and the Local Individuals Network for Customized Services. The City will provide fair housing information through one-on-one training for landlords and tenants and through three City-sponsored workshops. It is anticipated 500 tenants and landlords will be assisted in the upcoming year.

The fair housing specialist will be involved with activities that pertain to public housing through a partnership with the Housing Authority. Housing Authority procedures that pertain to federal and state landlord and tenant law for public housing will be reviewed. Investigations will be conducted about tenant complaints. When requested by HUD, workshops will be presented to provide information to tenants about their responsibilities and rights under state and federal law.

The City building official will provide a summary of accessibility requirements to each individual who requests an architectural and engineering plan review through the City Planning and Community Development Department. These handouts will include the HUD Accessibility Guidelines *Seven Technical Requirements* pamphlet and a summary listing of the Fair Housing Act accessibility requirements and the Section 504 of the Rehabilitation Act of 1973 accessibility requirements (see [Appendix F](#)).

SP-60 Homelessness Strategy

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

The CoC group participates in the annual statewide housing status (homeless) survey which is undertaken to identify the number and demographics of homeless people in the state. The City will coordinate this survey. The most recent statewide housing status survey was undertaken for the night of January 4, 2015. Although HUD recommends pursuing expansive outreach to identify the number of homeless youth in a community, the City cannot undertake surveying within the public school district because of privacy laws. However, the Great Falls Public School District homeless coordinator reports as of December 2013 there were 289 homeless students in the district.

Resources Available to Address the Needs of Chronically Homeless People:

- The Great Falls Rescue Mission will do outreach to chronically homeless people through the day room program and will provide sleeping mats to chronically homeless people during nights which have life threatening weather.
- The Center for Mental Health will have an adult case manager who will provide outreach and wellness checks for chronically homeless people.
- Opportunities, Inc., will provide support to chronically homeless people through screening for homelessness issues during intake, referrals, limited case management, financial assistance and job training assistance.
- The YWCA will provide 30 different human service agencies with vouchers for chronically homeless people to use at its used clothing store.
- The Indian Family Health Clinic will provide community resource information through group sessions provided by staff members.

Addressing the emergency and transitional housing needs of homeless persons

The Great Falls Rescue Mission (Rescue Mission) is the primary emergency shelter provider in Great Falls. It is difficult to delineate the specific numbers of beds available for emergency shelter versus transitional housing as the organization does not use governmental funding and is not restricted by specific programming requirements, therefore, they can be flexible regarding bed usage. Whether a specific bed is used for emergency or transitional shelter is driven by actual need that particular day. Overall, there are 71 beds available in the men's shelter and 74 beds in the women and family shelter. This is an increase from the 59 beds available last year due to an expansion of the women's shelter. The number of people who can be housed at the women and family shelter depends on the composition of the family. In an emergency such as life threatening weather, the Rescue Mission will also provide an additional 20 mats on the floor for men and five mats and foldaway cribs for women and children.

The Rescue Mission has purchased property near to their current facilities and is currently fundraising for the new facility which will provide emergency shelter/transitional housing for approximately 100 people (families and women). As of 2015 the Cameron Family Shelter has received funding and anticipates the building to be complete in 2016. It would include medical facilities and offices in addition to family beds.

In addition to the housing services noted in the previous chart, the Rescue Mission will provide meals to both homeless and non-homeless people; optical, chiropractic, emergency dental and hygiene care; and legal assistance. The Rescue Mission will collaborate with MSU-Bozeman School of Nursing to provide primary health care for homeless people when they are able to have a doctor available on-site.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

As noted in the previous *2010—2015 Consolidated Plan*, transitional housing with supportive services is identified as the highest priority need for individuals and families who are homeless, as well as special populations such as teenagers, young parents, ex-felons or people who have mental illness. To meet this need, The City will support development of transitional housing or other housing options for homeless people or people who are at risk of becoming homeless if appropriate application is made for CDBG/HOME funding for new construction or rehabilitation projects. The CoC verifies transitional housing as a current priority need.

As observed in previous years, the trend of overall gradually increasing numbers and needs of homeless people continues in Great Falls. In particular, the Great Falls Rescue Mission continues to see a significant increase in the number of single parent families seeking assistance.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Opportunities Inc. is the central intake point for social service providers in Great Falls. This agency provides a wide range of services for homeless and low income people. Opportunities Inc. will provide referral, limited case management and designated payee's status for Social Security recipients to prevent people from becoming homeless. This agency will collaborate with

the Center for Mental Health to provide services for the mentally ill homeless by referral for emergency services and direct assistance services.

Opportunities Inc., will collaborate with a local organization, Vets4Vets, implemented a Stand Down in Great Falls in September 2014. Veterans were given surplus military supplies and representatives from a wide variety of social service agencies participated to provide services and information.

Kairos Youth Services, Inc., provides emergency shelter, transitional housing and supportive services as noted in the previous chart. Supportive services will include housing, meals, recreational programming, tutoring, coping skills training, independent living skills training, individual treatment planning, case management and individual, group and family counseling. As of February 2013 the agency reports a waiting list of five youth at Missouri River Youth and Shelter Home. Kairos will operate aftercare/early intervention mentoring programs with the Eighth Judicial District Youth Court, administer the Montana Foster Care Independence Program in Region 2 and provide Psychiatric Residential Treatment Facility Program services. Kairos Youth Services, Inc., has purchased property on which to build a facility to replace the Missouri River Youth and Shelter Home and anticipates construction soon.

A sampling of other agencies who will provide a variety of services for people who are homeless or threatened with homelessness include the Great Falls Community Food Bank, St. Vincent de Paul, Salvation Army and many churches. In addition, numerous programs through government departments such as the Cascade County Office of Public Assistance will work toward meeting the needs of homeless people.

SP-65 Lead based paint Hazards

Actions to address LBP hazards and increase access to housing without LBP hazards

All CDBG and HOME funded housing project sites which have visual paint deterioration where rehabilitation will take place will be tested by a certified risk assessor for the presence of lead-based pain using the XRF Technology Lead Analyzer. On any sites that test positive, only contractors certified in safe work practices will be used for abatement. Clearance tests will be performed by an Environmental Protection Agency (EPA) certified risk assessor and a certified laboratory after interim controls are completed.

The City will pay for lead-based paint testing on all projects through the City housing rehabilitation programs and the only added cost to the homeowner is if a contractor has to be hired. The City will provide outreach activities for lead-based paint hazards through notifying contractors of the availability of lead-based paint certification classes if certified private companies hold such classes during the upcoming year.

Lead-based paint hazards will be taken into consideration on all pertinent CDBG-funded projects being undertaken by sub-grantees.

NeighborWorks Great Falls will comply with all HUD lead safe requirements on all City-funded housing rehabilitation projects for properties constructed prior to 1978. NWGF is a certified abatement company and has staff that is certified in lead safe practices. NWGF will have certified inspectors from the Housing Authority do initial tests using the XRF Lead Analyzer to check for the presence of lead-based paint in all projects involving a building constructed prior to 1978. If lead-based paint is found, NWGF staff or subcontractors certified in lead safe practices will do abatement or mitigation and obtain laboratory clearance tests from an EPA certified risk assessor after the abatement is completed. NWGF purchased an XRF Technology Lead Analyzer using CDBG funds and will have this testing tool available to the City, Housing Authority and Opportunities, Inc., for a nominal fee.

The Housing Authority will provide all new tenants with lead-based paint hazard reduction information and will include lead-based paint considerations in their policies. Lead-based paint hazard will be taken into consideration as part of the Housing Choice voucher program inspections which are done for private rentals. This process will include initial testing using the XRF Analyzer on all houses built prior to 1978 when peeling paint is present and children will be in the home. Safe work practices and clearance testing will be undertaken when the presence of lead-based paint is found.

The Housing Authority has retained an engineering consultant firm to address lead-based paint testing and mitigation, if required, at the main site rehabilitation project. The Housing Authority will provide information regarding previous lead-based paint testing to the City as each building is vacated, along with any clearance test results if abatement is required.

How are the actions listed above related to the extent of lead poisoning and hazards?

Preventive and rehabilitative measures will be taken in all CDBG and HOME funded housing and public facilities projects that serve young children to ensure the extinction of lead-based paint hazards. All rehabilitation projects in which the building was constructed before 1978 will address lead-based paint regulations. Information about lead-based paint hazards will be provided to all people who apply for City housing rehabilitation loans. If lead-based paint is found during initial testing on a project where families with children under the age of six reside they will be referred for testing for lead-based paint exposure.

How are the actions listed above integrated into housing policies and procedures?

Lead-based paint hazards will be taken into consideration on all pertinent CDBG-funded projects being undertaken by sub-grantees.

SP-70 Anti-Poverty Strategy

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Two non-profit social service agencies were allocated 2015/2016 CDBG funds to provide child care for low income families. These scholarships will provide transitional financial assistance to families to enable parents to seek or retain employment, maintain quality child care arrangements and receive education on budgeting for child care expenses.

Young Parents Education Center will provide on-site developmental day care, family support and outreach, pre-vocational activities and parenting/child development education to assist pregnant and parenting teens and young adults to build self-sufficiency. In the upcoming year the agency will expand their programs involving family support services, pre-vocational activities, parenting education classes and support groups to serve non-student young parents.

Rural Dynamics, Inc., (RDI) is a non-profit organization which provides programs designed to assist low to moderate income people to obtain financial security. RDI was awarded grant funds through the Northwest Area Foundation several years ago to provide programs to help people get out of poverty. RDI will use these grant funds locally to provide credit building loans, enroll participants in a small business individual development account program and maintain a support group for people participating in financial security programs. RDI will hold financial education workshops, provide free financial literacy classes for low income people and administer a youth financial literacy program. The agency will also partner with local agencies to provide income tax assistance sites to assist eligible low income people file their federal tax returns and claim earned income tax credits. RDI will partner with NWGF on their homeownership individual development account and provide financial literacy training as part of NWGF's homebuyer education program.

Opportunities, Inc. will provide a wide variety of programs to assist very low and low income people, including administration of the following programs which focus on assisting people out of poverty:

- 1) Work Force Investment Act Program – year round, full-time employment for dropout, low income, at risk and special needs young adults ages 16 through 22,
- 2) HeadStart Program – education of preschool-age children, child care, parent education, job training, continuing education, GED preparation, life skills classes, assistance with applying for financial aid for college and coordination with other community services,
- 3) Low Income Energy Assistance Program and Weatherization Program – financial assistance to low income families to help with utility bills, furnace replacement/repair and other energy efficiency services.

The YWCA of Great Falls will offer services that promote self-sufficiency, including life skills training classes, women's health workshops and self defense training. The agency will also collaborate with RDI to offer financial skill development training. The YWCA is partnering with the University of Great Falls Psychology Department to develop a volunteer/mentor program for eighth grade girls.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The Consolidated Plan is a guiding document for the next five years within the community and affordable housing is a crucial portion of this year's Plan, as indicated in the Goals set forth in the Strategic Plan and expressly stated in the Executive Summary. The Montana Continuum of Care is the coordinating agency for the chronically homeless and for those at risk of homelessness, but local agencies such as the Great Falls Rescue Mission are essential in supporting those goals. The planned shelter expansion is a response to this local demand.

The City of Great Fall's goals, programs and policies are aligned with members of the current Housing Task Force and other local nonprofit, faith-based and private businesses to provide not only affordable housing but decent, safe housing as stated in the goals and objectives. The Consolidated Plan, citizen participation process for every annual Action Plan and the monthly coordination meetings between housing providers aims to align agency goals with those stated in this plan. Assistance to LMI persons will be guided by the input provided to create the affordable housing plan.

SP-80 Monitoring

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

The City will be responsible for managing the day-to-day operations of the CDBG and HOME programs. The City will monitor the performance of all CDBG recipients and all entities receiving HOME funds from the City by reviewing program agreements and requirements with grant recipient prior to project start, monitoring projects through project completion and obtaining required documents prior to paying out full grant funds.

The grant award letter will include language regarding the need for timeliness in project implementation. See the following Performance Measurement section regarding actions which will be taken to monitor performance as related to meeting priorities and objectives set forth in the Consolidated Plan.

All CDBG sub-recipients other than City departments will be monitored on-site at least once during the grant activity period. All CDBG sub-recipients receiving program income which they are allowed to keep in their revolving loan funds will be monitored on-site annually to assure compliance with CDBG regulations. All entities receiving CDBG and HOME funding are required to provide quarterly project updates and project completion information which includes individual and community benefit.

All projects which involve construction contracts of more than \$2,000 will be monitored to assure compliance with Davis-Bacon Act regulations.

A current listing of local minority business enterprises (MBEs) taken from the Montana Department of Transportation website will be provided to all sub-grantees who will be procuring services with CDBG grant funds. Sub-grantees will be encouraged to submit a request for proposal directly to any appropriate MBEs. Bids for an amount over \$80,000 will be required to advertise in a regional newspaper.

All rental housing developed with the use of HOME funds will be monitored for property standard requirements and rent restrictions in accordance with HOME requirements. Tenant interviews will be conducted after one year of residency and again in the second year as required by the program policies of the City Rental Improvement Loan Program to verify rents are being kept within the required range.

Annual Action Plan

AP-15 Expected Resources

Introduction

All staff activities used in creating the Consolidated Plan is provided from 20% of CDBG funds allotted for Administrative spending.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	715,840	300,000	74,000	1,089,840	2,800,000	CDBG funds are anticipated to be \$700,000 annually for the program years 2016-2020
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	191,970	150,000	193,527	535,497	760,000	HOME funds are anticipated to be \$190,000 annually for the program years 2016-2020

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
General Fund	public - local	Admin and Planning Public Improvements Public Services	26,758,998	0	0	26,758,998	107,035,992	Based on 2015 budget.

Table 54 - Expected Resources – Priority Table

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

Federal funding will be leveraged with the support of local and regional outside (private) sources of funding as well as state and local funds. When evaluating yearly allocations of CDBG funding to grant applications, the Community Development Council (citizen volunteers) use the criteria of sustainability when selecting applicant awards. This is defined as the ability for the funded program to sustain itself by reducing and/or eliminating future CDBG funds and also in its ability to match federal dollars with other funding sources. Other key criteria used by the CDC in selecting projects for federal funding is its ability to reach the largest audience of LMI individuals and providing services to underserved communities i.e. avoiding service duplication. Both CDBG and HOME projects can maximize local impact with leveraged local resources among area providers.

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

A strong example of using publically owned land to address low to moderate income needs is the Westside Orchard Garden, located on public parkland called Community Hall Park. It is found within a LMI Census Tract (16) at 400 16th St NW Great Falls, MT. Sunburst Unlimited temporarily uses the land and opened Westside Orchard Garden in the spring of 2013 with the help of CDBG funding. Food grown in the garden is donated for local consumption for residents within the LMI tract, the Boys and Girls Club, and Meals on Wheels for elderly residents.

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Improvements	2016	2020	Public Housing Non-Homeless Special Needs Non-Housing Community Development	City of Great Falls	Public Improvements	CDBG: \$200,920	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 8832 Persons Assisted
2	Public Services	2016	2020	Non-Homeless Special Needs Non-Housing Community Development	City of Great Falls	Public Services	CDBG: \$97,000	Public service activities other than Low/Moderate Income Housing Benefit: 4723 Persons Assisted
3	Homeownership	2016	2020	Affordable Housing	City of Great Falls	Homeownership Housing Rehabilitation	CDBG: \$47,380 HOME: \$172,773	Rental units constructed: 12 Household Housing Unit Homeowner Housing Added: 8 Household Housing Unit
4	Housing Rehabilitation	2016	2020	Affordable Housing	City of Great Falls	Fair and Affordable Rental Housing Housing Rehabilitation	CDBG: \$167,372 General Fund: \$27,519	Rental units rehabilitated: 20 Household Housing Unit Homeowner Housing Rehabilitated: 12 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 200 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Economic Development	2016	2020	Non-Housing Community Development Economic Development	City of Great Falls	Economic Development	CDBG: \$50,000	Jobs created/retained: 5 Jobs

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Public Improvements
	Goal Description	Provide public facility and infrastructure assistance including handicap accessibility and energy efficiency improvements to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. Other activities that will be funded will primarily address structural deficiencies and basic code upgrades for public facilities and non-profit agencies that serve the general population.
2	Goal Name	Public Services
	Goal Description	Provide support to public service agencies operating programs that benefit low income persons. Over the next five years the City of Great Falls will provide funds to social service agencies to fund scholarships for child and youth day care/recreational/educational programs, purchase food for elderly home meal programs and other activities for the provision of services to low income people.
3	Goal Name	Homeownership
	Goal Description	Provide direct first-time homebuyer assistance to low to moderate income families. Partner agencies have included NeighborWorks Great Falls and Habitat for Humanity using HOME and non-HOME funding.

4	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners with very low to moderate income rental units to upgrade the city's housing stock to meet standard building codes to provide and sustain safe, affordable housing. The City of Great Falls, administered through the nonprofit Neighborhood Housing Services, Inc. (dba NeighborWorks Great Falls), will provide loans to low income homeowners through the Deferred Payment Loan program. The City of Great Falls, administered through the nonprofit Neighborhood Housing Services, Inc. (dba NeighborWorks Great Falls), will provide loans to property owners to rehabilitate rental units that will be rented to low income people through the Rental Improvement Loan program.
5	Goal Name	Economic Development
	Goal Description	Provide funding for projects which create decent paying jobs with benefits for persons from low to moderate income households. The City of Great Falls will fund economic development projects which will result in the creation of jobs for low to moderate income people. Such projects will include funding to the Great Falls Development Authority (GFDA) revolving loan fund to provide gap financing to existing and start-up businesses to create new jobs for low to moderate income people. Economic Development was recently allocated 10% of CDBG dollars in FY 2015 and this allocation is predicted to continue through the next five years.

AP-35 Projects

Introduction

The Community Development Council (CDC) has recommended 21 projects for funding from the CDBG and HOME programs including funding for administration and planning at the 20% HUD limit.

19 projects are exclusively funded through the CDBG program. The CDBG program funds five housing projects, one economic development project, four public facilities projects, and eight public service projects. Four projects; 2015 DPL Program, 2015 RIF Program, 2015 W&S Program, and NHS Revolving Loan Fund will be funded using program income and expanded with additional funds awarded from 2015/2016 funds. Public service project will not exceed the 15% HUD limitation and will total \$107,000.

One project, NHS – Affordable Housing Program will be exclusive funded by HOME program funds to new construction and/or rehabilitation of rental units.

The City received requests from 23 agencies for a total of \$1,149,474 in CDBG funds. All applications were reviewed and 18 projects being recommended for funding. Of the 18 projects selected for funding, seven projects did not receive full funding. Seven requests did not receive funds due to lack of funding.

Projects

#	Project Name
1	NHS Revolving Loan Fund
2	PCD Rehabilitation Services
3	PCD Code Enforcement Program
4	2015 DPL Program
5	2015 RIF Program
6	2015 W&S Program
7	2015 CDBG Administration
8	Great Falls Development Auth - RLF
9	GFHA - Holland Court Rehab Phase I
10	Park & Rec - Natatorium
11	Park & Rec - Chowen Springs Play Structure
12	Public Works-Sidewalk Replacement
13	Meals in Wheels Program
14	Boys & Girls Club Scholarship
15	Family Promise of GF
16	Park & Rec CRC/Nat Scholarships
17	Great Falls Senior Center Meal Program

#	Project Name
18	Quality Life Concepts
19	Rural Dynamics - Credit Building for LMI Individuals
20	Young Parent Education
21	2015 HOME Administration
22	NHS - HOME Affordable Housing
23	Habitat for Humanity Infrastructure

Table 56 – Project Information

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

Applications for CDBG and HOME funds were submitted to the Planning and Community Development Department (PCD) and were reviewed by members of the department for eligibility and forwarded to the Community Development Council (CDC) to determine application benefits and funding recommendations. The CDC was giving funding priority by the City Commission as a guideline of making the funding recommendations. The priorities were determined based on input from the public gathered at a public hearing held by the Commission and other input received by the PCD. Recommendations made by the CDC are then presented to the Commission for approval and award. Approved awards for 2015/2016 fiscal year will be submitted with the 2015-2019 Consolidated Plan.

Over the last few years the number of funding application amount has been double the amount of funding received by the City. This has been the major obstacle to addressing underserved needs within the community. The CDC has had a harder time then ever evaluating what project to fund and what projects have to be postponed or not funded at all.

AP-38 Project Summary

Project Summary Information

See pages 146-158.

1	Project Name	NHS Revolving Loan Fund
	Target Area	City of Great Falls
	Goals Supported	Homeownership Housing Rehabilitation
	Needs Addressed	Homeownership Housing Rehabilitation
	Funding	CDBG: \$22,780
	Description	Construction of high school homes in conjunction with advanced building Trades Classes at GF High School and CM Russell High School; construction or renovation single family or rentals in target neighborhoods.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
Planned Activities	Construction of high school homes in conjunction with advanced building Trades Classes at GF High School and CM Russell High School; construction or renovation single family or rentals in target neighborhoods.	
2	Project Name	PCD Rehabilitation Services
	Target Area	City of Great Falls
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$68,000
	Description	Provide rehab counseling, loan processing, inspections and construction monitoring for all CDBG funded City revolving loan housing programs for low income people.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	
	Planned Activities	Provide rehab counseling, loan processing, inspections and construction monitoring for all CDBG funded City revolving loan housing programs for low income people.
3	Project Name	PCD Code Enforcement Program
	Target Area	City of Great Falls
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation Fair and Affordable Rental Housing
	Funding	CDBG: \$31,031 General Fund: \$27,519
	Description	Provide services to preserve and enhance health and safety by enforcing international and city codes related to maintenance of property and buildings.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Provide services to preserve and enhance health and safety by enforcing international and city codes related to maintenance of property and buildings.
4	Project Name	2015 DPL Program
	Target Area	City of Great Falls
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation Fair and Affordable Rental Housing
	Funding	CDBG: \$100,000
	Description	Provide funds for no interest loan program for property owners having low to moderate incomes to bring home up to current code requirements
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Provide funds for no interest loan program for property owners having low to moderate incomes to bring homes up to current code requirements.
5	Project Name	2015 RIF Program
	Target Area	City of Great Falls
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation Fair and Affordable Rental Housing
	Funding	CDBG: \$150,000
	Description	Provide funds for no interest loan program for property owners who provide rental units which remain affordable to low income households, to bring rental units up to current code requirements
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Provide funds for no interest loan program for property owners who provide rental units which remain affordable to low income households, to bring rental units up to current code requirements.
6	Project Name	2015 W&S Program
	Target Area	City of Great Falls
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$15,000

	Description	Funds to expand citywide no interest/low interest loan program for low income households and property owners who provide rental units which remain affordable to low income households, to construct or replace water and sewer service lines.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Funds to expand citywide no interest/low interest loan program for low income households and property owners who provide rental units which remain affordable to low income households, to construct or replace water and sewer service lines.
7	Project Name	2015 CDBG Administration
	Target Area	City of Great Falls
	Goals Supported	Public Improvements Public Services Homeownership Housing Rehabilitation Economic Development
	Needs Addressed	Public Improvements Public Services Homeownership Housing Rehabilitation Fair and Affordable Rental Housing Economic Development
	Funding	CDBG: \$143,168
	Description	General oversight, promotion, financial accountability, monitoring, reporting, and coordination of the CDBG program including activities to further fair housing and the Continuum for Care for Homelessness
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	
	Planned Activities	General oversight, promotion, financial accounting, monitoring, reporting, and coordination of the CDBG program including activities to further fair housing and Continuum of Care for Homelessness.
8	Project Name	Great Falls Development Auth - RLF
	Target Area	City of Great Falls
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$50,000
	Description	Expansion of the existing revolving loan fund that provides gap financing to existing and start-up businesses to create new jobs for persons of LMI households.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Expansion of the existing revolving loan fund that provides gap financing to existing and start-up businesses to create new jobs for persons of LMI households.
9	Project Name	GFHA - Holland Court Rehab Phase I
	Target Area	City of Great Falls
	Goals Supported	Public Improvements
	Needs Addressed	Public Improvements Fair and Affordable Rental Housing
	Funding	CDBG: \$97,737
	Description	Redesign, removal of all concrete and asphalt, back-fill, and repaving of parking lots, sidewalks, and handicap access ramps for LMI housing complex.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Redesign, removal of all concrete and asphalt, back-fill, and repaving of parking lots, sidewalks, and handicap access ramps for LMI housing complex.
10	Project Name	Park & Rec - Natatorium
	Target Area	City of Great Falls
	Goals Supported	Public Improvements
	Needs Addressed	Public Improvements
	Funding	CDBG: \$33,183
	Description	Replacement of existing doors, door frames and transom frames at the Morony Natatorium.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Replacement of existing doors, door frames and transom frames at the Morony Natatorium, the only city indoor pool open to the public.
11	Project Name	Park & Rec - Chowen Springs Play Structure
	Target Area	City of Great Falls
	Goals Supported	Public Improvements
	Needs Addressed	Public Improvements
	Funding	CDBG: \$40,000
	Description	Purchase and replacement of existing ADA play structure of play area border in park adjacent to a public housing authority neighborhood.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Purchase and replacement of existing ADA play structure and play area border in park adjacent to a public housing authority neighborhood.
12	Project Name	Public Works-Sidewalk Replacement
	Target Area	City of Great Falls
	Goals Supported	Public Improvements
	Needs Addressed	Public Improvements
	Funding	CDBG: \$30,000
	Description	Grant program to provide assistance to low income homeowners to remove and replace hazardous sidewalks within the city limits.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Grant program to provide assistance to low income homeowners to remove and replace hazardous sidewalks within the city limits.
13	Project Name	Meals in Wheels Program
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$25,000
	Description	Purchase food for Meals on Wheels, a citywide home delivery meal program for low/moderate income elderly who are handicapped or unable to prepare meals for themselves.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Purchase food for Meals on Wheels, a citywide home delivery meal program for low/moderate income elderly who are handicapped or unable to prepare meals for themselves.
14	Project Name	Boys & Girls Club Scholarship
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$25,000
	Description	Provide scholarships for summer day camps for children of low income families.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Provide scholarships for summer day camps for children of low income families.
15	Project Name	Family Promise of GF
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Transitional Housing Public Services
	Funding	CDBG: \$10,000
	Description	Purchase of covered cargo trailer and other supplies to support the Families Moving UP Program which provides shelter for homeless families.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Purchase of covered cargo trailer and other supplies to support the Families Moving UP Program which provides shelter for homeless families.
16	Project Name	Park & Rec CRC/Nat Scholarships
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$10,000
	Description	Provide scholarships for disabled adults to participate in special needs water activities at the community indoor pool facility and also provide child care scholarships for low income families for after school programs and summer camp programs offered through the community recreation center.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Provide scholarships for disabled adults to participate in special needs water activities at the community indoor pool facility and also provide child care scholarships for low income families for after school programs and summer camp programs offered through the community recreation center.
17	Project Name	Great Falls Senior Center Meal Program
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$7,000

	Description	Purchase food and supplies for on-site meal program for the elderly administered in elderly facility.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Purchase food and supplies for on-site meal program for the elderly administered in elderly facility.
18	Project Name	Quality Life Concepts
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$10,000
	Description	Purchase of assistance lift and hospital beds for use with disabled adults day program and the purchase of camera monitoring system in two high risk group homes for developmentally disabled adults.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
Planned Activities	Multiple locations within the city	
19	Project Name	Rural Dynamics - Credit Building for LMI Individuals
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$10,000
	Description	Provide scholarships for credit building services through the Credit Building for LMI Individuals Program.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Provide scholarships for credit building services through the Credit Building for LMI Individuals Program.
20	Project Name	Young Parent Education
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$10,000
	Description	Provide day care scholarships for very low to low income teen or young adult parents completing high school or GED programs.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Provide day care scholarships for very low to low income teen or young adult parents completing high school or GED programs.
21	Project Name	2015 HOME Administration
	Target Area	City of Great Falls
	Goals Supported	Homeownership Housing Rehabilitation
	Needs Addressed	Fair and Affordable Rental Housing
	Funding	CDBG: \$19,197
	Description	General oversight, management, promotion, financial accountability, monitoring and coordination of the HOME program
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	General oversight, management, promotion, financial accountability, monitoring and coordination of the HOME program.
22	Project Name	NHS - HOME Affordable Housing
	Target Area	City of Great Falls
	Goals Supported	Homeownership
	Needs Addressed	Fair and Affordable Rental Housing
	Funding	:
	Description	Development of new or rehabilitated houses or apartments for sale or rental
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	New construction of single family homes or rental properties, rehabilitation of single family homes, down payment assistance.
23	Project Name	Habitat for Humanity Infrastructure
	Target Area	City of Great Falls
	Goals Supported	Homeownership
	Needs Addressed	Homeownership
	Funding	CDBG: \$24,600
	Description	Infrastructure improvements for Habitat for Humanity Self Help Home program
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Infrastructure for two Habitat for Humanity Self Help homes to include concrete flatwork (parking pad, sidewalk, front porch, back step), site excavation & backfill, and water & sewer installation.

AP-50 Geographic Distribution

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

The geographic area for the entitlement city, Great Falls, Montana, is outlined as the area within the city limits as established by the City of Great Falls. The city does not have any census tract areas of minority concentration based on Federal Financial Institutions Examination Council (FFIEC) data. Low-income concentration as an area where 51% of the population has income at or below 80% AMI, these concentrations are located in census tracts 4, 7, 8, 9, 16, 21, and 108.

Geographic Distribution

Target Area	Percentage of Funds
City of Great Falls	100

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Great Falls does not allocate funding priorities based on a geographic basis. Funding priorities are based on community need and the number of individuals or households that can benefit of the limited amount of funding available. Some allocations are based in an area need and focus efforts in LMI census tracts with 51% LMI residents. That is the only distinction that is made by the City of Great Falls.

AP-55 Affordable Housing

Introduction

The City of Great Falls will be using CDBG and HOME funds to support a number of affordable housing projects within the city limits. The HOME project that the City will be supporting consists of new construction or rehabilitation of an estimated 12 housing or rental units and down payment assistance. CDBG funds will be used to support five housing projects ranging from code enforcement to housing and rental rehabilitation, new construction of housing units through our CBDO.

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

Table 58 - One Year Goals for Affordable Housing by Support Requirement

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

Table 59 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing

Introduction

The City of Great Falls relies on the Great Falls Housing Authority (GFHA) to provide public housing within the City. The Great Falls Housing Authority will responsibly and respectfully make safe, basic, affordable housing for qualified residents.

The GFHA currently manages five public housing sites and two affordable housing sites. These facilities provide 490 units to income qualifying residents with this subsidized housing program and another 24 units that are not subsidized but are affordable to low/moderate income households through their affordable housing programs.

The Great Falls Housing Authority also a manager for Housing Choice Vouchers formally the Section 8 housing program. This program allows private landlords to contact GFHA and they will inspect the home for Housing Quality Standards and subsidizes the rent for the approved client.

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

Projects for the coming year will include the continued rehabilitation of the Parkdale (MT-2-1 and MT-2-2) units. This project includes remodeling older housing units to remove lead-based paint, asbestos, and bring units up to current building codes.

CDBG funds were also awarded to the GFHA for redesign, removal, and replacement of all concrete, asphalt, sidewalks, parking lots, and ADA ramps around the Holland Court housing units. All units are currently ADA accessible units, however due to site settling some units are no longer assessable to wheelchair access.

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

The Great Falls Housing Authority does not provide direct involvement in management and homeownership. However they encourage tenants that are interested to other organizations within the city that provide financial management training, homeownership training, and other forms of assistance.

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

The Great Falls Housing Authority is not currently designated as troubled.

AP-65 Homeless and Other Special Needs Activities

Introduction

The City will facilitate the local Continuum of Care for Homelessness (CoC) group. The CoC group will meet regularly throughout the upcoming year to expand understanding of the services needed by those who are homeless, to facilitate consolidation and coordination of homeless services and to improve service delivery to homeless people. The City will facilitate the meetings. The CoC meetings will provide a networking opportunity and assist in keeping funding options open for future HUD homeless grant funds.

Transitional housing with supportive services is identified as one of the priority needs for individuals and families who are homeless, as well as special populations such as teenagers, young parents, ex-felons or people who have mental illness. To meet this need, The City will support development of transitional housing or other housing options for homeless people or people who are at risk of becoming homeless if appropriate application is made for CDBG/HOME funding for new construction or rehabilitation projects. The CoC verifies transitional housing as a current priority need.

The trend of overall gradually increasing numbers and needs of homeless people continues in Great Falls. In particular, the Great Falls Rescue Mission continues to see a significant increase in the number of single parent families seeking assistance.

The City will encourage application for federal homeless grant funds for projects assisting homeless people through the Montana Continuum of Care Coalition (MT CoCC) statewide application process. The MT CoCC is a statewide group which addresses homelessness issues and is the main vehicle for organizations in Montana to apply for federal homeless grant funds. Staff from Opportunities, Inc., (the local Human Resource Development Council) will be the local liaison with the MT CoCC. If local agencies pursue projects through the MT CoCC, the CoC will support all appropriate proposals. In addition, the City will encourage application for federal homeless grant funds for such projects through the MT CoCC statewide application process.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including...

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

During the 2015/2016 program year, the City of Great Falls will be assisting a new non-profit agency, Family Promise of Great Falls, with a \$10,000 grant. Family Promise is an organization that offers shelter and case management services to homeless families in Great Falls that don't currently have access to the Great Falls Rescue Mission. The families are housed in various religious congregations throughout the city on a week by week basis for up to 90 days. Family

Promise assists the families on finding long term housing as well as jobs and other services.

The City will also continue to work with a number of organizations within the city to reduce and eventually end the homelessness issues. Opportunity Inc continues to be a great resource for the city facilitating a number of local, state, and federal programs to assist with homelessness. NeighborWorks Great Falls, Habitat for Humanity, and Rural Dynamics Inc provide services to help prevent homelessness.

The City of Great Falls does not provide direct assistance to homeless outreach programs. There are a number of agencies that provide special outreach services for homeless persons and their individual needs.

2. Addressing the emergency shelter and transitional housing needs of homeless persons

The Great Falls Rescue Mission (Rescue Mission) is the primary emergency shelter provider in Great Falls. It is difficult to delineate the specific numbers of beds available for emergency shelter versus transitional housing as the organization does not use governmental funding and is not restricted by specific programming requirements, therefore, they can be flexible regarding bed usage. Whether a specific bed is used for emergency or transitional shelter is driven by actual need that particular day. Overall, there are 71 beds available in the men's shelter and 74 beds in the women and family shelter. This is an increase from the 59 beds available last year due to an expansion of the women's shelter. The number of people who can be housed at the women and family shelter depends on the composition of the family. In an emergency such as life threatening weather, the Rescue Mission will also provide an additional 20 mats on the floor for men and five mats and foldaway cribs for women and children.

The Rescue Mission is in the process of constructing a ~43,000 square foot facility that will accommodate 114 beds and will be focused on housing homeless families. The beds will be set up in 28 rooms with private bathrooms to provide a more private place for families to be together. The facility will also have space available for supportive services including a medical/dental clinic, year round youth programs and coordinated social services.

The YWCA Mercy Home offers emergency shelter and supportive services for women and children who are victims of domestic violence. The Mercy Home can accommodate 30 women and children. The support services provided include crisis intervention, support groups, information and referral, group counseling, personal advocacy, parenting classes, 911 cell phone lending program, transportation, legal advocacy, resume building & employment coaching.

3. Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating

access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Great Falls Rescue Mission will do outreach to chronically homeless people through the day room program and will provide sleeping mats to chronically homeless people during nights which have life threatening weather.

The Center for Mental Health will have an adult case manager who will provide outreach and wellness checks for chronically homeless people. The Center will do outreach with the mentally ill homeless population and will evaluate to determine whether symptoms of a mental disorder are evident. The agency will coordinate with organizations such as Opportunities, Inc., Office of Public Assistance, Great Falls Rescue Mission, Salvation Army and St. Vincent DePaul to provide assistance with housing, food, clothing and payee services.

Opportunities, Inc., will provide support to chronically homeless people through screening for homelessness issues during intake, referrals, limited case management, financial assistance and job training assistance.

The YWCA will provide 30 different human service agencies with vouchers for chronically homeless people to use at its used clothing store.

The Indian Family Health Clinic will provide community resource information through group sessions provided by staff members.

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

Opportunities Inc provides assistance with eviction prevention and counseling. The City Fair Housing office provides training opportunities for training for landlords and tenants on how to avoid evictions. NeighborWorks Great Falls offers foreclosure prevention loans. Habitat for Humanity offers foreclosure prevention for their partner families. Young Parents Education Center offers individual counseling and group classes to help young adults with life skills, referrals to avoid eviction, assistance with rental applications, coordinate with landlords to prevent eviction and homelessness. The Center for Mental Health provides individual counseling and assistance for people being discharged from mental health facilities.

AP-75 Barriers to affordable housing

Introduction:

Barriers for affordable housing are discussed in section SP-55 of the strategic plan on page 127 of the Consolidated Plan. These issues are also discussed in great detail in the City's 2015 Analysis of Impediments to Fair Housing Choice attached to the Consolidated Plan.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The Great Falls City Commission set policy addressing barriers to affordable housing for the city. The Planning and Community Development Department (PCD) deals with all policies related to land use, zoning ordinances, building codes, growth limitations, and fees and charges. The department researched policy questions and looks for best practices in following the policies set forth by the Commission. Recommendations to administration and the Commission are made with input from public and parties that are interested in the policies.

PCD completed an update to the City's Growth Policy in 2013. The Growth Policy strengthened and highlights existing initiatives while creating the pathway for others. It is utilized for guidance in land use, service delivery, policy making and decision making.

AP-85 Other Actions

Introduction:

The Planning and Community Development (PCD) department administers the CDBG and HOME grant funds that the City is allocated each year. For the 2015/2016 program year the PCD will administer over one million dollars in funding for project in affordable housing, public facilities, economic development, and public services areas. These funds come from both federal dollars and program income.

Actions planned to address obstacles to meeting underserved needs

The CDBG and HOME programs will fund activities which assist in meeting the needs of individuals who are handicapped and/or underserved.

The following projects being allocated 2015/2016 CDBG funds will benefit people with disabilities: Great Falls City Park & Recreation - Natatorium; Great Falls City Park & Recreation—Chowen Springs Park; Great Falls City Public Works—Sidewalk Replacement; Great Falls Housing Authority – Holland Court Rehabilitation Phase I; Area VIII Agency on Aging – Meals on Wheels; Great Falls City Park & Recreation—Morony Natatorium & Community Recreation Center; and, Quality Life Concepts, Inc.; Great Falls Senior Center – Meal Program.

The City will collaborate with non-profit agencies and other governmental departments to seek funding to fill the gaps needed to make projects financially feasible so they can serve low to moderate income families. Efforts will be made to work with social service and housing agencies to encourage collaboration when providing supportive services and housing services. In addition, ongoing technical support and coordination with housing providers and social services agencies will assist with meeting federal requirements in as timely, efficient manner as possible to avoid delays in obtaining federal funding.

Actions planned to foster and maintain affordable housing

Affordable housing will be one of the priorities to be addressed by the City. The City will allocate 30% (\$214,752) of the annual CDBG allocation and 90% (\$172,773) of the annual HOME allocation to affordable housing activities. The overall housing strategy is described in detail in the Consolidated Plan. The strategy was developed based on a market analysis, an assessment of housing needs and extensive community involvement. It should be noted in addition to the many other activities that will be undertaken as part of the housing strategy, the Great Falls Housing Task Force and other groups will be consulted with on an ongoing basis to determine if additional needs arise or if strategies need to be modified.

By regulation, at least 15% of HOME funds must be set-aside for a Community Housing Development Organization (CHDO). As NHS is the only CHDO in the community, they will be allocated at least 15% of HOME funds for the upcoming year.

The majority of the projects which will address affordable housing will be implemented through a variety of City and NHS (NeighborWorks Great Falls) housing programs.

Actions planned to reduce lead-based paint hazards

Preventive and rehabilitative measures will be taken in all CDBG and HOME funded housing and public facilities projects that serve young children to ensure the extinction of lead-based paint hazards. All rehabilitation projects in which the building was constructed before 1978 will address lead-based paint regulations. Information about lead-based paint hazards will be provided to all people who apply for City housing rehabilitation loans through Neighborhood Housing Services, Inc. (dba NeighborWorks Great Falls). If lead-based paint is found during initial testing on a project where families with children under the age of six reside they will be referred for testing for lead-based paint exposure.

All CDBG and HOME funded housing project sites which have visual paint deterioration where rehabilitation will take place will be tested by a certified risk assessor for the presence of lead-based pain using the XRF Technology Lead Analyzer. On any sites that test positive, only contractors certified in safe work practices will be used for abatement. Clearance tests will be performed by an Environmental Protection Agency (EPA) certified risk assessor and a certified laboratory after interim controls are completed.

The City will pay for lead-based paint testing on all projects through the City's housing rehabilitation programs and the only added cost to the homeowner is if a contractor has to be hired. The City will provide outreach activities for lead-based paint hazards through notifying contractors of the availability of lead-based paint certification classes if certified private companies hold such classes during the upcoming year. Lead-based paint hazards will be taken into consideration on all pertinent CDBG-funded projects being undertaken by sub-grantees.

Actions planned to reduce the number of poverty-level families

In the 2015/2016 program year, the City of Great Falls will be allocating 7% of CDBG funds to economic development activities that will promote the creation of jobs for low to moderate individuals. The funding will be in the form of loans made to local businesses to create low income jobs.

Two non-profit social service agencies will be allocated 2015/2016 CDBG funds to provide child care for low income families. These scholarships will provide transitional financial assistance to families to enable parents to seek or retain employment, maintain quality child care arrangements and receive education on budgeting for child care expenses.

Young Parents Education Center will provide on-site developmental day care, family support and outreach, pre-vocational activities and parenting/child development education to assist pregnant and parenting teens and young adults to build self-sufficiency. In the upcoming year the agency will expand their programs involving family support services, pre-vocational

activities, parenting education classes and support groups to serve non-student young parents.

Rural Dynamics, Inc., (RDI) is a non-profit organization which provides programs designed to assist low to moderate income people to obtain financial security. RDI will use grant funds locally to provide credit building loans, enroll participants in a small business individual development account program and maintain a support group for people participating in financial security programs. RDI will hold financial education workshops, provide free financial literacy classes for low income people and administer a youth financial literacy program. The agency will also partner with local agencies to provide income tax assistance sites to assist eligible low income people file their federal tax returns and claim earned income tax credits. RDI will partner with NHS on their homeownership individual development account and provide financial literacy training as part of NHS's homebuyer education program.

The City will also work with Opportunities Inc which provides a number of programs to assist LMI families.

Actions planned to develop institutional structure

The City has no plans at this time to make any significant institutional structure changes. The Planning and Community Development department will however be working to implement best practices to streamline administration in response to the decrease funding levels that have been experienced in recent program years.

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

In addition to the formal structure inherent in administering CDBG and HOME funds, the City will pursue informal communication and coordination with public and private housing agencies, other government agencies, private businesses, non-profit community agencies and other entities who work to meet the housing assistance and support service needs of low income and moderate income people in the community. The City will coordinate with local agencies to help reduce duplication of programs, to emphasize efficient service delivery for local, state and federal programs and to identify and overcome gaps in institutional structure for carrying out the previously described strategies developed to address the priority needs.

The nine Neighborhood Councils will meet on a regular basis to discuss neighborhood issues. It is anticipated local non-profit agencies and governmental departments will use Neighborhood Council meetings as a forum to disseminate information about their organizations. There will be an ongoing agenda item at all City Commission meetings to give Neighborhood Council members an opportunity to report on specific issues of concern. The Neighborhood Councils will hold three Council of Council meetings in the upcoming year to discuss matters of citywide importance. The City staff person who serves as the Neighborhood Council coordinator will communicate regularly with City management on issues brought up by the Neighborhood

Councils. The Neighborhood Council coordinator will actively participate in a variety of groups and committees to help increase governmental coordination with community members.

The Continuum of Care for Homelessness will meet in an ongoing effort to identify needed services and coordinate delivery of services for homeless people. The City will continue its close working relationship with the Housing Authority. This relationship will include such aspects as sharing of staff, review of loan requests, environmental clearances and fair housing activities. The City Commission appoints the Housing Authority Board of Commissioners and the city manager appoints the executive director of the Housing Authority. Housing Authority staff is made up of City employees. The Housing Authority board acts as a loan committee and reviews loan requests for the City's CDBG-funded housing rehabilitation programs. This agreement was last reviewed in July 2013. The City will do environmental reviews for all Housing Authority sponsored construction and rehabilitation projects; therefore, the City will be aware of and review any proposed development sites or proposed demolition of public housing.

The City will work with both private and public organizations to provide open communication that will allow for greater information flow regarding housing and social services to be provided to the public.

Program Specific Requirements

AP-90 Program Specific Requirements

Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

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

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

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

Great Falls does not intend to use any other form of investment beyond eligible activities listed in 24 CFR 92.205(a)

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

All City HOME funds used as subsidies augmenting the affordable purchase by low to moderate income first-time homebuyer families of newly constructed or rehabilitated single family homes will be granted to NHS for its Owners in Partnership (OIP) program where NHS operates as the owner and developer of the properties. NHS is the City's only Community Housing Development Organization (CHDO) and Community-based Development Organization. All City HOME funds used for first-time homebuyer's down payment and closing cost assistance will be granted to NHS in its role as a HOME grant sub-recipient. The HOME funds will be secured with a deed restriction.

Each down payment assistance grant to homebuyers is secured with a deed restriction stating that if the house is sold, the grant monies must be returned to NHS to be used for down payment assistance to another qualifying buyer.

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

A Deed Restriction will be used to enforce HOME Program requirements and contain the following provisions:

- Principal residency requirement (including a separate Home Occupancy Agreement signed by the borrower)
- Equity share provision upon resale of the home purchased with HOME fund assistance
- Recapture provision based on net proceeds available from sale (voluntary or involuntary)
- Deed Restriction will be executed at time of closing and recorded at that time

An agreement between NeighborWorks Great Falls and the City of Great Falls ensures that the CHDO complies with all recapture provisions established, most recently updated in 2015. It notes when and how recapture is scheduled to occur. While a deed restriction acts as the primary agreement between borrower and lender, information provided in the Program Income Policy clearly states the terms of recapture to the prospective homeowner, the required length of affordability, and strongly associates responsibility to (ultimately) the Participating Jurisdiction, the City of Great Falls. This policy is attached to the 2015-2019

Consolidated Plan as **Appendix G.**

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

Great Falls has no current plans to use HOME funds to refinance existing secured by multifamily housing that is rehabilitated with HOME funds.

Loan Servicing

Beginning FY 2016, the City of Great Falls (City) will be utilizing Neighborhood Housing Services (dba NeighborWorks Great Falls (NWGF)) to operate and oversee their Housing Rehabilitation Loan Programs – Deferred Payment Loan Program, Rental Improvement Fund Program and the Water and Sewer Loan Program. NWGF will be responsible for processing applications for each of the loan programs.

NWGF will act as the loan servicer for existing loans as well as operate the loan program and underwrite new loans. Responsibilities include taking payments, making collections and monitoring compliance with HUD and City regulations.

The revolving loan funds will appear on the City's financial statements as an asset invested in NeighborWorks Great Falls. All existing and current loans will be assigned to NWGF for servicing. As the City's loan servicer, NWGF will be issuing loans on behalf of the City. All new loans will be issued under the name of "NeighborWorks Great Falls" and will clearly identify that the City is providing the funding for the loans. The City will be named as "investor" in the NWGF loan servicing software, so all loan proceeds are maintained in the investor account.

At no time is the Revolving Loan Fund to be used to pay for or reimburse for the costs associated with administering the Great Falls Housing Rehabilitation Loan Programs.

NWGF shall make loans for the purpose in which the City's Housing Rehabilitation Loan Program was designed and intended, the funds are not to be combined with any other loans. If any of these loans are being made to individuals that NWGF is also providing additional, separate loans to, the City shall be placed in a superior loan position to NWGF.

NWGF is responsible for adhering to the rules and guidelines of the U.S. Department of Housing and Urban Development (HUD) and the Community Development Block Grant (CDBG) program. If NWGF makes loans or conducts activities that are found to be ineligible by HUD, which results in a situation that requires repayment of funds to HUD, NWGF may be responsible for the repayment.

All proposed loans will be brought to the City's appointed loan review committee for final review and approval.

NWGF will notify the City prior to any loans being written off or forgiven.

NWGF will continue to use the same eligibility criteria as developed by the City. The City recognizes that forms/applications may be modified as needed. The City reserves the right to cancel this agreement if NWGF does not provide the necessary documents or reports in a timely manner and/or NWGF conducts or funds activities that are found to be ineligible by HUD.

Attachments

Citizen Participation Comments

Public Comment Period

Consisting of full day May 2nd, 2015 through May 31st, 2015

No public comments were received during the 30-day public comment window in any medium (mail, email, telephone, interview, et cetera).
No comments were presented in the May 19th, 2015 public hearing.

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Free application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 06/15/2015	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: M-15-201-30-0218	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: City of Great Falls		
* b. Employer/taxpayer Identification Number (EIN/TIN): 11 6001269	* c. Organizational DLNS: 000207090000	
d. Address:		
* Street1: 2 Park Drive S.	Street2: PO Box 4021	
* City: Great Falls	County/Parish: Cascade	
* State: MT: Montana	Province: <input type="text"/>	
* Country: USA: UNITED STATES	* Zip / Postal Code: 59403-5021	
e. Organizational Unit:		
Department Name: Planning & Community Developme	Division Name: CPBC/HOME	
I. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr.	* First Name: Craig	Middle Name: <input type="text"/>
* Last Name: Raymond	Suffix: <input type="text"/>	
Title: Director		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 406-455-0535	* Fax Number: 406-454-0192	
* Email: crazymrd@greatfallsmt.net		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="0: City or Township Government."/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text"/>	
CFDA title: <input type="text"/>	
* 12. Funding Opportunity Number: <input type="text" value="14-239"/>	
* Title: <input type="text" value="HOME Investment Partnership Program"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/>	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="City of Great Falls 2016-2020 Consolidated Plan, including the 2015/2016 HOME Investment Partnership Program Annual Action Plan and certifications for a participating jurisdiction."/>	
Attach supporting documents as specified in agency instructions <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: * b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project

* a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal	151,372.00
* b. Applicant	3.00
* c. State	3.00
* d. Local	3.50
* e. Other	3.00
* f. Program Income	130,001.00
* g. TOTAL	341,371.00

19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

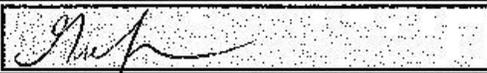
* Last Name:

Suffix:

* Title:

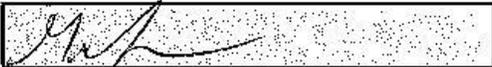
* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:  * Date Signed:

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s). <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 06/13/2015	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: H-15-30-0002	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: City of Great Falls		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 31-6301209	* c. Organizational DUNS: 0602670930009	
d. Address:		
* Street1: 2 Park Drive S.	<input type="text"/>	
Street2: PO Box 5021	<input type="text"/>	
* City: Great Falls	<input type="text"/>	
County/Parish: Cascade	<input type="text"/>	
* State: MT: Montana	<input type="text"/>	
Province: <input type="text"/>	<input type="text"/>	
* Country: USA: UNITED STATES	<input type="text"/>	
* Zip / Postal Code: 59403-5021	<input type="text"/>	
e. Organizational Unit:		
Department Name: Planning & Community Development	Division Name: CEBG/PCOE	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Dr.	* First Name: Craig	<input type="text"/>
Middle Name: <input type="text"/>	<input type="text"/>	
* Last Name: Raymond	<input type="text"/>	
Suffix: <input type="text"/>	<input type="text"/>	
Title: Director		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 406-454-0530	Fax Number: 406-454-3131	
* Email: cgraymond@greatfallsmt.net		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text"/>	
CFDA Title: <input type="text"/>	
* 12. Funding Opportunity Number: <input type="text" value="L4-218"/>	
* Title: <input type="text" value="Community Development Block Grant"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="City of Great Falls 2015-2020 Consolidated Plan, including the 2015/2016 CDBG Annual Action Plan and certifications for a participating jurisdiction"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant	39
* b. Program/Project	39
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date:	07/01/2015
* b. End Date:	06/30/2016
18. Estimated Funding (\$):	
* a. Federal	715,040.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	300,000.00
* g. TOTAL:	1,015,040.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix:	Mr. * First Name: Gregory
Middle Name:	
* Last Name:	Doyon
Suffix:	
* Title:	City Manager
* Telephone Number:	406-455-0451 Fax Number: 406-451-3131
* Email:	gdoyon@greatfalls.net
* Signature of Authorized Representative:	 * Date Signed: 6/9/15

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

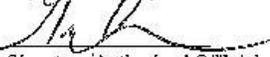
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



Signature/Authorized Official

Date

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) _____, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

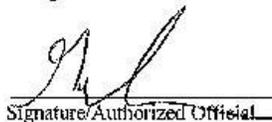
jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.


Signature/Authorized Official _____ Date 6/1/15


Title _____

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;


Signature/Authorized Official 6/9/15
Date


Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Appendix - Alternate/Local Data Sources

1	Data Source Name correction of Housing Cost Burden (Jurisdiction)
	List the name of the organization or individual who originated the data set. 2007-2011 CHAS
	Provide a brief summary of the data set. In the currently provided data set, the numbers for the Jurisdiction as a whole are less than the numbers just for White individuals. This makes NA-25 incomplete as currently provided. The administrator used addition to combine all numbers provided for each race in order to provide a new Jurisdiction as a whole number; the sum of all races is now greater than the single White category. This number was used in in accessing the need of any racial or ethnic group for disproportionate greater need, which was impossible with the previous data provided.
	What was the purpose for developing this data set? Correcting an addition error in the provided 2007-2011 CHAS data
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? This data only concerns correcting an additon error in 2007-2011 CHAS data provided in NA-25. The data involves correction Jurisdiction as a whole numbers by adding all racial burden data provided below
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? 2007-2011
	What is the status of the data set (complete, in progress, or planned)? complete
2	Data Source Name Johnson Economics - Housing Market Analysis
	List the name of the organization or individual who originated the data set. Johnson Economics was contracted in April of 2015 to conduct a housing market study of the City of Great Falls and metropolitan area (County). The draft was recieved on May 8th, 2015.
	Provide a brief summary of the data set. The Housing Market Analysis was broken down into the following sections: Population and Housing Demographics, Economic Overview, Housing Needs v. Inventory, Housing Trends, Current Housing Inventory and Characteristics, Housing Costs, Low-Income Housing Inventory & Vouchers, Market Rate Rental Housing Trends, and Findings and Conclusions.

	<p>What was the purpose for developing this data set?</p> <p>The FRP and contracting of Johnson Economics was to ensure that the most up-to-date housing information was available not only for the revision of the Consolidated Plan for 2015-2019 but also to provide this housing data to local nonprofit and partner agencies throughout the Great Falls, MT region.</p> <p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>April-May, 2015. The current draft was received by the City of Great Falls by Johnson Economics on May 8, 2015.</p> <p>Briefly describe the methodology for the data collection.</p> <p>Census data (ACS 2011-2013), the City of Great Falls data, interviews, the Great Falls Housing Authority, subject properties, and proprietary Johnson Economics LLC data were collected by a single individual, Brendan Buckley of Johnson Economics. Mr. Buckley was contracted by the city to complete a summary report and Excel document of data sources as part of the contract between the City of Great Falls and the Johnson Economics.</p> <p>Describe the total population from which the sample was taken.</p> <p>The total population include the City of Great Falls limits, Casacade County, and in numerous cases comparisons to peer cities within the state of Montana (Missoula and Billings).</p> <p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Interviews and research conducted by Johnson Economics, LLC included email correspondence and interviews with property owners and the Great Falls Housing Authority in additon to communication with the City of Great Falls.</p>
3	<p>Data Source Name</p> <p>2011-2013 American Community Survey</p> <p>List the name of the organization or individual who originated the data set.</p> <p>United States Census Bureau (Bureau of the Census)</p> <p>Provide a brief summary of the data set.</p> <p>The most up to date census data available from the American Factfinder website. Data is compiled as a 3-year estimate from 2011-2013. Data sets include DP02 (social), DP03 (economic), DP04 (housing) and DP05 (demographic) information for the city limits of the City of Great Falls, Montana.</p> <p>What was the purpose for developing this data set?</p> <p>The ACS data provided by HUD and included in the demographic tables, specifically under Needs Accessment, include data from 2007-2011. Not only is this data four years old at best, but this data set reflects the "Great Recession" period of economic cycle that affected American life. Planning and Community staff felt this data did not accurately reflect the current (2015) realities of growth, post-recession housing construction, or economic sectors.</p>

	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>2011-2013</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>The American Community Survey (ACS) is a nationwide survey designed to provide communities a fresh look at how they are changing. It is a critical element in the Census Bureau's decennial census program. The ACS collects information such as age, race, income, commute time to work, home value, veteran status, and other important data. As with the 2010 decennial census, information about individuals remains confidential.</p>
	<p>Describe the total population from which the sample was taken.</p> <p>A survey (estimate) of all residents within the City of Great Falls, Montana.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Units of measure vary by data set. Measure may include total number, median, percentage, margin of error, et cetera. Each data set is arranged by theme e.g. economic, social, demographic.</p>