

CITY OF GREAT FALLS

Consolidated Annual Performance and Evaluation Report (CAPER)

Program Year 2020
(July 1, 2020 – June 30, 2021)



The City's Year-End Report for
Community Development Block Grant (**CDBG**) and
HOME Investment Partnerships Program (**HOME**)

Prepared by
City of Great Falls
Planning & Community Development
2 Park Drive South, Great Falls, MT 59401

Draft Released: September 7, 2021
Public Comment: September 7-September 21, 2021
Submitted to HUD: September 23, 2021

Table of Contents

CR-05 - Goals and Outcomes	2
CR-10 - Racial and Ethnic Composition of Families Assisted	8
CR-20 - Affordable Housing 91.520(b)	14
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)	16
CR-30 - Public Housing 91.220(h); 91.320(j)	18
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)	19
CR-40 - Monitoring 91.220 and 91.230	22
CR-45 - CDBG 91.520(c)	23
CR-50 - HOME 91.520(d)	24

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

This Consolidated Annual Performance and Evaluation Report (CAPER) covers the City's 2020 grant program year: July 1, 2020 - June 30, 2021. In this reporting period, the City of Great Falls received a total of \$1,088,578 in federal funds from the U.S. Department of Housing and Urban Development (HUD) through Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). The scope of the CAPER includes a wide range of activities undertaken in the past program year using CDBG and HOME program funds to address the priorities and goals identified in the City's 2020-2024 Consolidated Plan. In addition to the City using federal funding to provide a wide variety of services to low and moderate income individuals, it should be noted that housing providers, non-profit human service organizations, private entities, and other government agencies within the community used many other funding sources beyond those provided by HUD to assist low income households and persons experiencing homelessness. Major elements of this report include accomplishments and activities undertaken in the following areas:

Community development; Infrastructure improvements; Economic development; Public facilities upgrades; Public services provision; Affirmatively furthering fair housing; Addressing the needs of homeless people through the Continuum of Care for Homelessness Community homeless services; Maintaining and promoting affordable housing; Addressing obstacles to meeting underserved needs; Eliminating barriers to affordable housing; Taking steps to improve the degree and efficiency of interactions between governmental and private operations; Improvement of public housing; Evaluating and reducing lead-based paint and asbestos hazards; Reducing the number of people living below the poverty level; and securing additional funding resources to accomplish all of these activities.

During Program Year 2020, the City completed CDBG and HOME-funded activities that addressed the following goals outlined in the 2020-2024 Consolidated Plan and 2020 Action Plan: Affordable Housing, Fair Housing, Housing Rehabilitation, and Planning and Administration. Additionally, a number of CDBG and HOME-funded projects were initiated during Program Year 2020 that are still being carried out. Accomplishments related to activities not yet completed will be reported in next year's CAPER. These projects include activities that address the following goals outlined in the City's strategic and action plans: Public Facilities and Improvements, Public Services, Economic Development, Affordable Housing, and Housing Rehabilitation (including Public Housing Modernization).

The CAPER was made available to the public for a 15-day comment period from September 7, 2021, through September 21, 2021, to solicit comments from the public on activities undertaken and overall performance of the City's CDBG and HOME programs. Comments received from the public are included as an appendix.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Affordable Housing	Affordable Housing Homeless Non-Homeless Special Needs	HOME	Homeowner Housing Added	Household Housing Unit	10	0	0.00%	3	0	0.00%
Affordable Housing	Affordable Housing Homeless Non-Homeless Special Needs	HOME	Direct Financial Assistance to Homebuyers	Households Assisted	35	7	20.00%	7	7	100.00%
Economic Development	Non-Housing Community Development Economic Development	CDBG	Jobs created/retained	Jobs	15	0	0.00%	3	0	0.00%
Economic Development	Non-Housing Community Development Economic Development	CDBG	Businesses assisted	Businesses Assisted	10	0	0.00%	2	0	0.00%

Fair Housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	600	172	28.67%	120	172	143.33%
Housing Rehabilitation	Affordable Housing Public Housing Non-Homeless Special Needs	CDBG	Rental units rehabilitated	Household Housing Unit	40	0	0.00%	1	0	0.00%
Housing Rehabilitation	Affordable Housing Public Housing Non-Homeless Special Needs	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	25	1	4.00%	5	1	20.00%
Planning and Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Planning and Administration	CDBG/ HOME	Other	Other	0	0	City staff to administer, manage, and monitor CDBG and HOME funded activities.			
Public Facilities and Improvements	Public Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	0	0.00%	2000	0	0.00%

Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	0	0.00%	1000	0	0.00%
-----------------	--------------------------------------------------------------------------------------	------	-----------------------------------------------------------------------------------	---------------------	------	---	-------	------	---	-------

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

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

The City Commission approved the use of CDBG and HOME funds for all 7 goals outlined 2020 Annual Action Plan, which are listed and defined in the following chart.

2020 Annual Action Plan Goals

1	Goal Name	Public Services
	Goal Description	The City of Great Falls will provide CDBG funds to social service agencies for activities that provide services for low to moderate income people or areas. The City will focus efforts on meeting the needs of our homeless population, health/mental health needs, and underserved youth this Program Year. Applications will not be limited to these activities; however, the City will give priority to applications that directly address homelessness, health/mental health, and youth services.
2	Goal Name	Affordable Housing
	Goal Description	Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness.
3	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners and the Public Housing Authority. The City will focus on upgrading the City's housing stock to meet standard building codes to provide and sustain safe, affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization with the use of CDBG funding.
4	Goal Name	Fair Housing
	Goal Description	Provide funding for activities that affirmatively further fair housing. The City of Great Falls will fund activities that include but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions, as well as service activities that reduce and remove barriers to fair housing choice.
5	Goal Name	Economic Development
	Goal Description	All Economic Development Activities this Program Year will be carried out by GFDA through the administration of their already established CDBG Revolving Loan Fund for the purpose of job creation and retention for low to moderate income households. This program operates on program income from CDBG.
6	Goal Name	Public Facilities and Improvements
	Goal Description	Provide public facility and infrastructure assistance to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. There will be a focus on funding activities that are associated with public parks, public safety, public recreation as well as slum and blight removal this program year with the understanding that efforts are not limited solely to these priorities.
7	Goal Name	Planning and Administration
	Goal Description	City staff to administer, manage, and monitor CDBG and HOME funded activities.

2020 AAP Goals Chart uploaded as an image in IDIS

The 2020 Annual Action Plan Goals are identified by the City based on priority needs determined during the development of the City's Five-Year Consolidated Plan and are used as guidelines for the awarding of grant funds to subrecipients. Each of the City's goals are considered high priority and none ranks higher than the other.

Accomplishments from projects awarded and completed in Program Year 2020 are reported in Table 1 and include activities related to Affordable Housing, Fair Housing, and Housing Rehabilitation:

Affordable Housing: Downpayment Assistance was provided to 7 low-to-moderate income families in Great Falls. NeighborWorks Great Falls utilizes HOME program income to provide homeownership opportunities to eligible households.

Housing Rehabilitation: Rehabilitation assistance was provided to 1 homeowner through the City's CDBG Revolving Loan Fund, which focuses efforts on upgrading the City's housing stock to meet standard building codes to provide and sustain safe, affordable housing.

Fair Housing: Public service activities were carried out to affirmatively further fair housing for 172 individuals and included fair housing education, outreach, referrals, and information pertaining to the rights and responsibilities of landlords and tenants.

Planning and Administration: While this goal was met during Program Year 2020, Table 1 does not include associated units of measure, which is to fund City staff to administer, manage, and monitor CDBG and HOME-funded activities.

Accomplishments from projects initiated during Program Year 2020 that are still being carried out are not included in Table 1 as they are not yet complete. Program Year 2020 activities still in progress are listed below according to their associated goals and include:

Public Services: Alliance for Youth was awarded funding for activities within their Youth Resource Center to provide meals, transportation, addiction and suicide prevention services to youth that are homeless, at risk of homelessness, and/or have been abused.

Affordable Housing: NeighborWorks Great Falls received HOME funds for the development of two affordable single family dwellings, which will be sold to LMI households earning at or below 80% of the AMI as determined by HUD.

Housing Rehabilitation: CDBG funds were awarded to the Great Falls Housing Authority for Public Housing Modernization for a new elevator for Austin Hall, a 34-unit public housing development for the elderly and/or disabled.

Economic Development: Economic Development Activities this Program Year are being carried

out by Great Falls Development Authority through the administration of their already-established CDBG Revolving Loan Fund for the purpose of job creation.

Public Facilities and Improvements: CDBG funds were awarded for the purchase of an ambulance to provide EMS transport services for the LMI residents within Fire District 1 and to install new ADA compliant ramps and sidewalks around Longfellow Elementary School.

A detailed description of funded activities and correlating disbursements of funds are included in the PR-02 Activities List, PR-05 Drawdown Report, and PR-26 CDBG Financial Summary Report, all of which are attached to this report as an appendix. Activities to prevent, prepare for, and respond to the coronavirus (COVID-19) pandemic are addressed in section CR-15 of this report.

CR-10 - Racial and Ethnic Composition of Families Assisted

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

	CDBG	HOME
White	0	6
Black or African American	1	1
Asian	0	0
American Indian or American Native	5	0
Native Hawaiian or Other Pacific Islander	0	0
Other/multi-racial or unreported	167	0
Total	173	7
Hispanic	0	1
Not Hispanic	1	6
Unreported	172	0

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Not all beneficiaries of this program year's projects and activities reported racial or ethnic status; those individuals are reflected in Table 2 above as "unreported." The City is focused on assisting low-to-moderate income families that live within the city limits. Data from the 2019 5-year American Community Survey Estimate indicated that the population of Great Falls is largely White/Non-Hispanic, with minorities representing 15.7% of the total population. American Indian/Alaska Natives make up the largest minority group at 4.93% of the total population, while persons of Hispanic origin make up 4.85% of the population. Asian and Black or African American residents represent less than 1% of the city's population. The City provides funding for activities that do not discriminate against any ethnic or racial group.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available.

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$1,189,868	\$230,713.46
HOME	public - federal	\$1,557,456	\$197,072.44
General Fund	public - local	\$0	\$0
Other (CDBG-CV)	public - federal	\$711,890	\$91,112

Table 3 - Resources Made Available

For Program Year 2020, the City received a total of \$1,088,578 in federal funds to achieve the goals identified in the Consolidated Plan and Annual Action Plan. Total resources made available this year, as reflected in Table 3, include those federal funds as well as program income received through ongoing CDBG and HOME programs, such as the City's CDBG Revolving Loan Fund, GFDA's CDBG Economic Development Revolving Loan Fund, and NeighborWorks Great Falls HOME program income. As mentioned in previous sections of this report, a number of activities were undertaken by the City this year to address the City's strategic and annual goals, which include Public Services, Affordable Housing, Housing Rehabilitation, Fair Housing, Economic Development, Public Facilities and Improvements, and Planning and Administration. The City has allocated nearly all of this year's federal funding to undertake these activities, as projected in the 2020 Annual Action Plan.

The City received two special CDBG allocations (CDBG-CV) from HUD during Program Years 2019 and 2020 to prevent, prepare for, and respond to the coronavirus (COVID-19) pandemic. These allocations (\$475,515 in PY2019; \$236,375 in PY2020) were authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) under Community Development Block Grant (CDBG-CV). In Program Year 2020, CDBG-CV funds were awarded to YWCA to provide counseling to individuals directly affected by Coronavirus and to Alluvion Health for the purchase of a Mobile Medical Unit to prevent, prepare for, and respond to Coronavirus by providing health services such as vaccination distribution, testing locations, and other health-related responses to low-to-moderate income individuals in the City of Great Falls. Accomplishments associated with these CDBG-CV public service activities will be reported in next year's CAPER, following activity completion. A detailed description of funded activities and correlating disbursements of funds are included in the PR-02 CDBG-CV Activities List, PR-05 CDBG-CV Drawdown Report, and PR-26 CDBG-CV Financial Summary Report, all of which are attached to this report as an appendix.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of Great Falls	100	100	Municipality

Table 4 – Identify the geographic distribution and location of investments

All activities funded by the City are required to take place within the city limits. Many of the activities funded are located in low to moderate income (LMI) census tracts, where at least 51% of the households are LMI, earning 80% or less of the area median income. Some of the activities that the City undertakes are income-based and can take place outside the LMI census tracts; however, the recipient must qualify as low to moderate income or fall within the Limited Clientele benefit.

Leveraging

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

Leveraging by grant applicants and subrecipients is encouraged by the City and is a contributing factor in the City's decision to award CDBG and HOME funds. The Grant Committee reviewed all applications for CDBG and HOME funding that were received this program year. HOME-funded projects require a 25% match. Although a match is not required for CDBG subrecipients, many are able to provide matching funds in addition to their CDBG awards. The matching funds consist of state, local, and private funds as well as other federal funds that were allowed to be used for match. City staff is not aware of any publicly-owned land that was utilized to address the needs identified in the Consolidated Plan this program year.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$ 3,510,707
2. Match contributed during current Federal fiscal year	\$ 896,255
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$ 4,406,962
4. Match liability for current Federal fiscal year	\$ 12,250
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$ 4,394,712

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal <i>No</i> sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
20-1483-PI	10/10/2019	\$172,529.03						\$172,529.03
19-1486-PI	09/06/2019	\$114,315.32						\$114,315.32
19-1488-PI	09/06/2019	\$117,970.19						\$117,970.19
19-1489-PI	09/06/2019	\$116,879.68						\$116,879.68
19-1490-PI	09/06/2019	\$144,461.40						\$144,461.40
19-1491-PI	09/06/2019	\$106,099.00						\$106,099.00
19-1492-PI	09/06/2019	\$124,000.00						\$124,000.00

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE Report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$0	\$1,141,382.45	\$219,929.80	\$0	\$921,452.65

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0

Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises				Male
Contracts						
Dollar Amount	0	0				0
Number	0	0				0
Sub-Contracts						
Number	0	0				0
Dollar Amount	0	0				0

Table 8 - Minority Business and Women Business Enterprises

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

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition		
	Number	Cost
Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations Displaced	0	0

Households Temporarily Relocated, not Displaced	0	0
-------------------------------------------------	---	---

Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	15	8
Number of Special-Needs households to be provided affordable housing units	0	0
Total	15	8

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	2	0
Number of households supported through Rehab of Existing Units	6	1
Number of households supported through Acquisition of Existing Units	7	7
Total	15	8

Table 12 – Number of Households Supported

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

Through the use of CDBG and HOME funds, the City was able to assist in the rehabilitation of 1 existing housing unit that is occupied by a low-to-moderate income household and provide downpayment assistance for 7 low-income households.

The City hopes to increase the number of new construction and rehabilitated homes in the future; however, this remains limited by three factors. The first factor is the amount of funding available to undertake these activities. Construction costs continue to increase on a yearly basis, while the amount of funds continues to decrease. The second factor is the amount of infill properties that are available for new construction within the city limits. Rehabilitation is a more viable option; however, the housing market is in high demand, so being able to purchase units at an affordable price is always a challenge. The final factor, which is relatively unique to Great Falls, is the extremely poor soils which make it necessary to use helical piers for foundations of housing structures. With this noted, the City will be receiving a large increase in new affordable housing construction as a result of the following projects: 1)

Meriweather Crossing (80 new, affordable single family homes that will be built and annexed into the City in 10 home phases), and 2) affordable infill homes in the Kranz subdivision.

Discuss how these outcomes will impact future annual action plans.

The amount of funding prioritized for these types of activities is based on responses from the Great Falls Community through the data collected during the Community Needs Assessment. Future Annual Action Plans will incorporate the Community Data and the goals initially set forth in the Consolidated Plan. Because the projects noted in the above section are in the construction process and agencies such as NeighborWorks and Habitat for Humanity will be in need of additional new lots in the future, staff anticipates working with NeighborWorks to develop the next subdivision that will provide a predictable number of new opportunities for low to moderate income home construction. This will be reflected in future Annual Action Plans.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	1	0
Moderate-income	0	7
Total	1	7

Table 13 – Number of Households Served

One of the main affordable housing programs the City administers is the CDBG-funded housing rehabilitation program to assist LMI renters and homeowners with housing rehabilitation activities. This program includes the 1) Deferred Payment Loan Program: no-interest deferred loans to low income homeowners to make code-related repairs to owner-occupied, single family homes; 2) Rental Improvement Loan Program: no-interest loans to property owners for code-related repairs to rental units which remain affordable to low income households; and 3) Water & Sewer Loan Program: no/low-interest loans to low income homeowners and property owners who provide rental units which remain affordable to low income households to construct or replace water and sewer lines. Residential rehabilitation program funds can also be used for housing upgrades to meet accessibility requirements for persons with disabilities.

All of the City's beneficiaries served this program year had household incomes less than 80% of the Area Median Income (AMI) level, and four of the households served have single-parent heads of household. All of the City's affordable housing beneficiaries were homeowners or were assisted in achieving homeownership.

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

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

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

Although the City does not directly receive federal funding to exclusively address homelessness, such Emergency Solutions Grants and Continuum of Care funding, the City partners with a robust network of non-profit organizations that work directly with those in our community who are experiencing homelessness. Notifications for public hearings and other requests for community involvement are forwarded to these non-profits that interact with homeless individuals and households on a day-to-day basis. The City also participates in the Continuum of Care and biweekly Case Conferencing meetings to assist with the coordination of homeless services.

Addressing the emergency shelter and transitional housing needs of homeless persons:

The City continues to encourage applications from organizations that address the need for emergency shelters and transitional housing facilities. The City hopes to continue to provide funding to new and existing non-profits to provide more opportunities for housing to the homeless. The Great Falls Rescue Mission is a wonderful partner and the only emergency shelter within the city limits. To date, the Rescue Mission has not applied for CDBG or HOME funds. As a faith-based organization, the Rescue Mission prefers not to accept federal funding for their projects and is financially supported almost exclusively with donations.

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

The City of Great Falls provides support and financial assistance to encourage preventative efforts and services that address homelessness in Great Falls. Supportive services for the homeless include assistance with case management, adult therapeutic aide services, emergency housing, food, clothing, household items and emergency medication funds.

Opportunities, Inc., is a primary partner that provides temporary rental assistance to help individuals avoid homelessness. The Center for Mental Health (CMH) employs full-time case managers who dedicate their time to outreach services (including wellness checks) to the chronically homeless population. Rural Dynamics provides credit counseling for individuals so that they are better able to manage expenses and avoid becoming homeless due to poor money management.

Great Falls Children's Receiving Home provides emergency foster care, shelter care and supportive

services for children who were removed from their homes because of abuse, neglect and abandonment. Kairos Youth Services provides a combination of emergency shelter/transitional housing and supportive services to abused, neglected, pre-delinquent and emotionally disturbed adolescents ages 12 to 18. Services provided to avoid homelessness include housing; food; individual treatment planning; case management; individual, group and family counseling; tutoring; coping skills training; independent living skills training and recreational programming. In recent years, Kairos became a respite care provider for the Department of Public Health and Human Services in the Psychiatric Residential Treatment Facility Program. Young Parents Education Center (YPEC) provides support services for young parents by coordinating with the school district's homeless coordinator and, in recent years, has provided a seminar setting for the City's Fair Housing Specialist to discuss housing rights and responsibilities with their students. Chronically homeless people under the age of 18 years of age are provided child care, assistance with completing applications for emergency assistance, and referral services.

Gateway Community Services provides transitional housing, case management, life skills training and cultural activities for males transitioning out of chemical dependency treatment.

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 City partners with multiple agencies through its involvement with the Continuum of Care and bi-weekly Case Conferencing meetings to assist homeless individuals and families in their transitions to permanent housing. This collaboration ensures that the City can assist wherever needed and be aware of the current resources available. A number of the agencies involved, as well as services provided and populations served, are outlined below:

Chronically Homeless: The Great Falls Rescue Mission (Rescue Mission) includes a men's shelter, women's shelter, and family shelter and 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. As a result, the Mission 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 52 beds available, with another 65 beds in the women shelter. In an emergency such as life threatening weather, the Rescue Mission provides additional mats on the floor and foldaway cribs to accommodate need.

Opportunities, Inc., receives Emergency Solutions Grant (ESG) funding and offers emergency assistance through rapid re-housing and homeless prevention services.

Families with Children: To meet growing need for shelter services for homeless families, the Great Falls Rescue Mission completed construction of the Cameron Family Center in November of 2016. The Cameron Family Center can serve approximately 134 people experiencing homelessness, 70 of which, on average, are children.

Veterans: Volunteers of America provides individualized service coordination to veterans who are homeless or at risk of being homeless through rapid rehousing, homelessness prevention, and emergency shelter as funding allows. St. Vincent de Paul's Grace Home offers transitional housing for homeless veterans, as well as employment and other general assistance.

Unaccompanied Youth: Young Parents Education Center provides 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. Alliance for Youth's Youth Resource Center serves youth ages 13-20 who are disadvantaged, homeless, or at risk of becoming homeless. Services offered include medical, dental, behavioral health care, substance abuse treatment, housing search support and advocacy. Additionally, drop-in centers operate in tandem with outreach programs, family engagement services, emergency shelters and transitional housing.

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

Actions taken to address the needs of public housing.

The Great Falls Housing Authority (GFHA) continued its 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; and electrical, plumbing and heating systems. Exterior sewer, water and electrical services will also be replaced. This modernization project began in 2015 and is expected to take 10 to 15 years to complete, contingent upon funding.

CDBG funds were awarded to the Great Falls Housing Authority this year for Public Housing Modernization for a new elevator for Austin Hall, a 34-unit public housing development for the elderly and/or disabled.

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

GFHA encourages tenants to be involved in the management of public housing through having two tenants on the Housing Authority Board of Commissioners. Resident board members serve two-year terms. All members serve without compensation.

Resident input was sought through public meetings, particularly as related to the annual plan and

renovation projects. All residents were notified of public meeting dates and agendas through GFHA's quarterly newsletter.

GFHA does not provide direct involvement in supporting homeownership. However, they connect tenants who are interested in homeownership to other organizations within the city that provide financial management training, homeownership training, and other forms of assistance.

Actions taken to provide assistance to troubled PHAs.

The Great Falls Housing Authority is not a designated troubled agency.

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

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

The Great Falls City Commission sets 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 researches policy questions and looks for best practices in following the policies set forth by the Commission. Recommendations to the Administration and the Commission are made with input from the public as well as stakeholders 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 regarding annexation, rezoning, and other discretionary land use decisions. It is anticipated that the Growth Policy document will be updated during the timeframe of the 2020-2024 Consolidated Plan. In fact, the Department expects to start work on a minor update of the Plan during calendar year 2021. This update will address future housing and community development needs. One other code initiative that should support more affordable rental housing projects is a code amendment completed earlier in 2020 to reduce the amount of landscaping required for multifamily housing projects. Finally, the most successful initiatives undertaken have been the City's partnerships with NeighborWorks to use the Planned Unit Development zoning process to reduce lot sizes and other development standards that make owner occupied affordable housing much more feasible to construct.

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

The City continues to meet underserved needs through the following CDBG and HOME-funded programs:

Housing Rehabilitation Program: The City's CDBG-funded revolving loan fund assists LMI renters and homeowners with housing rehabilitation activities, including no-interest deferred loans to low income homeowners to make code-related repairs; no-interest loans to property owners for code-related repairs to rental units which remain affordable to low income households; and no/low-interest loans to low income homeowners and property owners who provide rental units which remain affordable to low income households to construct or replace water and sewer lines. Residential rehabilitation program funds can also be used for housing upgrades to meet accessibility requirements for persons with disabilities. This program assisted 1 LMI household during this grant year.

Down Payment Assistance: NeighborWorks Great Falls utilizes HOME program income to provide down payment assistance to HOME program-eligible households, making homeownership a reality for 7 LMI households in Great Falls during Program Year 2020.

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

The possibility of lead-based paint hazards was addressed in all CDBG housing rehabilitation projects in which buildings were constructed prior to 1978 which met the minimum threshold. Information about lead-based paint hazards was provided to all people who applied for City housing rehabilitation loans. All homeowners receiving loans were notified of the age of their houses and the hazard of lead-based paint if any of the houses were built prior to 1978. The City monitored to assure lead-based paint hazard regulations were followed on all CDBG housing rehabilitation projects.

The Housing Authority provided all new tenants with lead-based paint hazard reduction information. Lead-based paint hazards were taken into consideration by the Housing Authority as part of the Housing Choice voucher inspections done for private rental units in all buildings built prior to 1978 where peeling paint was present and children would be in the home.

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

The City supports local agencies with administrative assistance and financial support to reduce poverty, including the Great Falls Development Authority. In recent years, CDBG funds were used to implement a household labor survey and analysis that provided data for new economic development initiatives to create jobs for low and moderate income residents.

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

A variety of means were used in the past year to improve the degree and efficiency of interactions between governmental and private operations. The nine Neighborhood Councils met regularly and provided a source of educational outreach for City staff to promote and seek input on CDBG and HOME program priorities. Additionally, the City's involvement with the Continuum of Care, NeighborWorks Great Falls, United Way, and other community groups creates a method to disseminate and obtain information on issues of importance to citizens.

In addition to community engagement, City staff remain in constant communication with all aspects of community development with collaboration through the Grants Administrator, Program Specialist, Fair Housing Specialist, and grant subrecipients. The efforts to develop a strategic approach to address LMI needs were a partnership and collaboration, which created a strong institutional structure.

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

The local Continuum of Care for Homelessness group worked toward coordination of services and avoiding duplication of homeless services in the community.

The City continued its close working relationship with the Housing Authority. This relationship included sharing of staff, environmental clearances and fair housing activities. The City Commission appoints the Housing Authority's Board of Commissioners and the City Manager appoints the Executive Director of the Housing Authority. Housing Authority staff members are City employees. All Housing Authority sponsored construction and rehabilitation projects were environmentally cleared by the City before any costs were incurred. Therefore, the City was aware of and reviewed any proposed development or demolition of public housing sites.

The City coordinated with the City and State Historic Preservation Officers to evaluate properties for historical significance as part of the environmental review process related to the use of federal funds.

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

The City of Great Falls continues to make diligent efforts to overcome impediments identified in the most recent Analysis of Impediments to Fair Housing Choice. The City has used CDBG funds to partially fund a Fair Housing Specialist position shared with the Great Falls Housing Authority.

The Fair Housing Specialist took on initiatives to educate the public on their housing rights and provided resources and referrals when needed. Outreach through education and networking was the principal method of furthering fair housing. Although in-person education and outreach continued to be limited this program year due to public health guidelines and restrictions related to COVID-19, activities undertaken by the City's Fair Housing Specialist included maintaining current fair housing information on the Housing Authority and City websites; distributing free pamphlets and posters with information about fair housing; participating in the local Continuum of Care for Homelessness as well as biweekly Case Conferencing meetings; and assisting tenants and landlords with landlord-tenant concerns. Of the 172 individuals who received Fair Housing services, 31 were reported as persons living with disabilities.

Collaborative efforts to develop a statewide Assessment of Fair Housing (AFH) among the State of

Montana Department of Commerce and Montana's three CDBG entitlement cities (the City of Billings, the City of Missoula, and the City of Great Falls) began in 2018 and paused in PY2020 due to changes in HUD's requirements for grantee reporting on affirmatively furthering fair housing. Effective July 31, 2021, HUD's [Interim Final Rule Restoring Affirmatively Furthering Fair Housing Definitions and Certifications](#) requires grantees to certify annually to meet the Fair Housing Act's obligation to affirmatively further fair housing. As such, the City will continue its efforts to identify and remove impediments, or barriers, to fair housing choice. This includes efforts to preserve and increase housing quality, choice, and affordability through CDBG and HOME funding streams, not only to employ a Fair Housing Specialist, but also to assist in creating rental housing and homeownership opportunities in the Great Falls market, as well as decrease slum and blighted properties throughout the city.

The City's most recent fair housing planning document is the 2015-2019 Analysis of Impediments and is included as an appendix.

CR-40 - Monitoring 91.220 and 91.230

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

Overall monitoring includes the following for CDBG and HOME programs:

Review of the community's use of available HUD, state, and local resources to meet the City's priorities listed in the Consolidated Plan.

Review of the effectiveness of, and demand for, the CDBG programs. Review of public comments received on the community's performance in meeting the needs described in the City's Consolidated Plan.

The City may fund a variety of agencies to carry out CDBG and HOME activities each year. Written agreements are executed that outline regulations, the scope of work, and funding. Agencies receiving federal funds are monitored by Planning & Community Development Department staff to ensure compliance with the terms of the agreement and applicable regulations, including Section 3 and minority business outreach.

CDBG and HOME projects and activities are monitored via desk review and/or site visits every year. HOME rental housing projects are monitored on a schedule as required by federal regulations based on the period of affordability. The on-site monitoring of HOME-funded rental housing is detailed in the following section (CR-50 - HOME 91.520(d)). On-site visits include an assessment of property standards completion and ongoing compliance inspections, tenant file review, household income verification, etc. City staff also conducts desk reviews to ensure that leases are in compliance with HOME regulations;

rents are compliant with HOME limits; tenant incomes are reviewed annually and they are within eligibility limits; the property owner/manager is inspecting the property at least annually; that adequate project reserves have been established and annual reports are received.

Affordable housing projects are also scrutinized via routine Risk Assessment in order for City staff to evaluate the relative level of risk of noncompliance for each project in the assisted portfolio. The factors taken into consideration are the number of units; staff turnover and experience; funding amounts, affordability periods and type of assistance provided; file and project documentation; and past performance. Projects with higher risk assessment scores are prioritized for intensive case management efforts to bring the project into compliance. These projects typically undergo multiple site visits and extensive technical assistance from City staff.

Homebuyers receiving federal assistance are monitored through review of the agency which has been granted the funds to undertake distribution of both down payment assistance and construction/rehab of housing units using federal funds.

The City requires that CHDOs apply for recertification on an annual basis to ensure continued requirements are being met for the CHDO designation throughout applicable affordability periods. The application includes (but is not limited to) maintenance of Board composition, including at least one-third membership by residents of low income neighborhoods and no more than one-third being public officials or local/state employees. Staff also conducts a CHDO capacity review every time a new project is funded to ensure the organization has the ability to carry out functions of the proposed project.

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

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

Per the City of Great Falls Citizen Participation Plan, a proposed copy of the Consolidated Annual Performance and Evaluation Report is made available to the public on the City's website, at the public library, and at the Planning & Community Development office for a 15-day comment period. Notice of availability of the report is published in the Great Falls Tribune, as well as on the City's website. All published notices have information available for individuals that are speech or hearing impaired. All comments received regarding the CAPER will be considered, and a summary of all comments will be included in the final copy of the CAPER to be posted to the City website.

CR-45 - CDBG 91.520(c)

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

The objectives set forth in the Consolidated Plan are still viable and appropriate:

Community development; Infrastructure improvements; Removal of slum and blight; Economic development; Public facilities upgrades; Public services provision; Affirmatively furthering fair housing; Addressing the needs of homeless people through the Continuum of Care for Homelessness Community homeless services; Maintaining and promoting affordable housing; Addressing obstacles to meeting underserved needs; Eliminating barriers to affordable housing; Taking steps to improve the degree and efficiency of interactions between governmental and private operations; Improvement of public housing; Evaluating and reducing lead-based paint and asbestos hazards; Reducing the number of people living below the poverty level; and securing additional funding resources to accomplish these tasks.

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

No

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

N/A.

CR-50 - HOME 91.520(d)

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

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The City was responsible for managing the day-to-day operations of the HOME programs. The City tracked the performance of all entities receiving HOME funds from the City by reviewing program agreements and requirements with grant recipient prior to project start, desk monitoring projects from initiation through project completion and obtaining required paperwork prior to paying out full grant funds

On-site inspection and program monitoring is conducted based on Federal regulations and periods of affordability. The on-site monitoring of the six HOME-funded units at First Avenue Estates, a multifamily rental housing property developed by NeighborWorks Great Falls, is due this year and scheduled for September 22, 2021. On-site monitoring of First Avenue Estates occurs every two years throughout the 20-year period of affordability, which is effective through 2036.

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

As part of the agreement with the City, each subrecipient receiving HOME funds through the City for housing projects containing five or more units was required to affirmatively market these units. The City

found the programs using HOME funds during this reporting period to be using every available option to market affordable housing units. The City will provide guidance to future grant subrecipients to continue successful marketing of the housing units.

The City monitored all NeighborWorks Great Falls (NHS) activity conducted with HOME funds by requiring NHS to submit quarterly reports on all activities. NHS marketed their Down Payment Assistance Program and new construction projects to realtors and bankers throughout the city. Bankers and realtors made referrals to the Down Payment Assistance Program and the homebuyers clubs offered by NHS. All graduates of the homebuyers clubs having low to moderate incomes were eligible to apply to purchase the newly constructed or rehabilitated homes, and a letter notifying of the purchase application time frame and procedure was mailed to all eligible graduates. In addition, information on all NHS services was included in their newsletters and on their website.

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

HOME program income generated by subrecipients is allowed to remain in their revolving loan accounts. The funds are to be used for eligible activities as outlined in the written agreement with the City. HOME program income was generated by only one subrecipient this program year. NeighborWorks Great Falls is currently the only subrecipient with HOME funds that generated program income. NeighborWorks Great Falls solely used HOME Program Income as downpayment assistance for purchase of homes to low-to-moderate income individuals. A total of 7 loans were processed during the program year.

The City's Program Income Policies and Procedures ensure that internal financial controls are established and followed by the City's Planning and Community Development Department (P&CD) as well as the City's Finance Department to accurately account for Program Income funds associated with the City's administration of its CDBG and HOME programs. This document is attached to this report as an appendix.

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

The City fosters and maintains affordable housing by collaborating with housing agencies such as NeighborWorks Great Falls (NHS), Habitat for Humanity, and the Great Falls Housing Authority to analyze and strategically create affordable housing opportunities, including new construction, housing rehabilitation, case management and counseling, and financial assistance.