

# CITY OF GREAT FALLS

## 2022 Annual Action Plan for HUD-Funded Programs

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  
(406) 455-8443

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Public Meeting: June 21, 2022  
Public Comment: May 16 – June 15, 2022  
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## 2022 Annual Action Plan

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

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The City of Great Falls Annual Action Plan for Program Year 2022 is scheduled for review by the Great Falls City Commission on July 5, 2022. City Commission action on the Annual Action Plan follows a plan development process which included input from local organizations and community residents through a public needs hearing held by the City Commission on April 5, 2022, a public meeting held on June 21, 2022 by the City Commission, and a 30-day public comment period extending from May 16, 2022 through June 15, 2022.

The purpose of this Annual Action Plan is to implement program year three of the five-year [2020-2024 Consolidated Plan](#), identify the housing and community development needs of low and moderate income (LMI) people in the community, and develop comprehensive, coordinated strategies for addressing those needs using available federal and non-federal resources. This Annual Action Plan for Program Year 2022 serves as the budget for the City of Great Falls Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). Detailed within this Plan are the City's recommended community grant goals and priorities for the upcoming program year, which begins July 1, 2022, and ends June 30, 2023. The City expects to receive an annual allocation of \$764,295 through CDBG and \$319,759 through HOME.

The five-year Consolidated Plan and subsequent Annual Action Plans are 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.

Eight priorities and related objectives are identified in the 2020-2024 Consolidated Plan to meet the diverse needs of low to moderate income households in Great Falls. These needs were identified primarily through the plan development process and citizen participation described in this section. Census data and other HUD-provided data were also reviewed to assist in identifying needs.

## Summarize the Objectives and Outcomes Identified in the Plan

*This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.*

The eight objectives, or goals, identified in the City's 2020-2024 Consolidated Plan are displayed in the following table.

### 2020-2024 Goals and Objectives

1	Goal Name	Public Services
	Goal Description	Provide support to public service agencies' operating programs that benefit low to moderate income persons. The City of Great Falls will provide CDBG funds to social service agencies for activities that service low to moderate income people or areas.
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. This includes, but is not limited to rehabilitation, acquisition/rehab/resale, demolition, site preparation, reconstruction, and slum and blight activities.
3	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, rental property owners through the City's revolving loan fund. Provide construction and rehabilitation assistance for Public Housing Modernization activities. Housing Rehab may include meeting standard building code upgrades, demolition, site preparation, slum and blight activities, rehabilitation activities addressing livability and life safety.
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	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 and retention of jobs for low to moderate income people.
6	Goal Name	Public Facilities and Improvements
	Goal Description	Provide public facility and infrastructure assistance, including but not limited to handicap accessibility, energy efficiency improvements, and removal of slum and blighted properties to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure.
7	Goal Name	Planning and Administration
	Goal Description	City staff to administer, manage, and monitor CDBG and HOME funded activities.

8	Goal Name	CDBG Slum & Blight Removal
	Goal Description	The City will allocate funding to remediate properties negatively affected by slum and blighted conditions. This will include clearance with the end goal of providing affordable housing opportunities and/or public facility improvements.

Based on the 2020-2024 Consolidated Plan goals and objectives, as well as citizen input during this plan development process, the following priorities have been identified in the Annual Action Plan for Program Year 2022:

**Public Improvements:** 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.

**Affordable Housing:** Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness through HOME Program funding, including the NeighborWorks Great Falls HOME-funded Down Payment Assistance and Owners in Partnership programs. Affordable housing efforts to remediate properties negatively affected by slum and blighted conditions will be funded through CDBG.

**Public Services:** 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, substance abuse, underserved youth, and Fair Housing 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, substance abuse and youth services.

**Residential Housing Rehabilitation:** 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. Housing efforts to remediate properties negatively affected by slum and blighted conditions will be funded through CDBG.

**Economic Development** All Economic Development Activities in 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.

**Planning and Administration:** City staff to administer, manage, and monitor CDBG and HOME funded activities.

In Program Year 2022, the City will continue to provide funding through the following programs utilizing program income:

**CDBG Program Income:** City of Great Falls – Housing Rehabilitation Loan Program

Great Falls Development Authority – Economic Development Revolving Loan Fund

**HOME Program Income:** NeighborWorks Great Falls – Down Payment Assistance and Owners in Partnership Program

At any time program income from the above programs may be reallocated to eligible grant activities if City Staff deem it necessary. Activities to be funded as a grant from the program income must meet an outlined priority already approved and a National Objective.

### **Evaluation of Past Performance**

*This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.*

The City of Great Falls receives CDBG funds as an Entitlement City and HOME funds as a Participating Jurisdiction. Year after year, the City's HUD-funded grant programs have successfully met performance expectations to benefit low and moderate income individuals and areas within the community.

Prior to the development of the 2018 Annual Action Plan, more than midway through the 2015-2019 Consolidated Plan cycle, the City evaluated its performance to date. After careful review of the City's practices, staff determined that it was necessary to update the program's Grant Policies to meet the City's current staff capacity and to create a more strategic and sustainable community grant program. Past performance demonstrated that the City was funding many small grants, collaborating with multiple non-profit agencies, and relying solely on subrecipients to reach community goals. Another challenge was that public facility projects were difficult for non-profits to implement due to their lack of knowledge of federal requirements. Evaluation of past performance also identified that many of the same agencies continuously requested funding for the same programs.

The evaluation of these issues led to updating the City's Grant Policies in 2018. The City now balances the funding of subrecipients with providing direct programming in order to reach community goals. Instead of funding many small grants, the City's most recent Annual Action Plans have focused on fewer goals. This narrowed funding approach is intended to make a greater impact by allocating greater funding amounts to a smaller number of projects annually. These updated policies will continue to be implemented in Program Year 2022.

## Summary of Citizen Participation Process and Consultation Process

*Summary from citizen participation section of plan.*

Community involvement is a critical component of the planning process for the effective use and prioritization of CDBG and HOME funds. The Citizen Participation Plan contains the City of Great Falls' policies and procedures for involving the community in the development of the Citizen Participation Plan, Annual Action Plan and the Consolidated Plan; the review of the Consolidated Annual Performance and Evaluation Report (CAPER); and any substantial amendments to the Consolidated Plan. The City's Citizen Participation Plan was adopted by the City Commission on April 20, 2021, following a 15-day public comment period from March 22, 2021, through April 5, 2021. A copy of the Citizen Participation Plan can be found as an appendix to this document and on the City's [website](#).

A Community Needs Assessment survey and three public meetings were held to gather citizen input for the development of the 2020-2024 Consolidated Plan. As detailed in the [Consolidated Plan](#), a total of 529 survey responses were received, and the public meetings were attended by community residents, as well as public agencies, nonprofit agencies, and Neighborhood Council members. For the development of this 2022 Annual Action Plan, a public needs hearing was held by the City Commission on April 5, 2022; a 30-day public comment period on the proposed Plan was provided from May 16, 2022 through June 15, 2022; a public meeting at the City Commission was held on June 21, 2022, and a final public hearing was held at the City Commission Meeting on July 5, 2022. All public comments received and themes addressed in public meetings were transcribed and attached to this document as an appendix.

Public outreach included notifications via traditional and social media outlets, including the Great Falls Tribune, The Electric, and the City's Facebook page and webpage, as well as direct emails to other public, private, and non-profit agencies. Additionally, City Staff distributed a communication piece to partners and to all 9 Neighborhood Councils outlining the proposed priorities and process. A detailed review of public outreach and citizen participation for Program Year 2022 is found in sections AP-10 and AP-12 of this Plan.

## Summary of Public Comments

*This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.*

All public comments received for the development of this Plan are attached to this document as an appendix. Below is a brief summary by commenter.

### Public Needs Hearing – April 5, 2022:

Michael Yeagerlener – Spoke about the increased rent and how there is a need for more incorporated neighborhoods regardless of income.

Sherrie Arey – Encouraged staff to include the Housing Market Study information in the planning process. She also spoke about the need for housing in the community that is affordable.

Carrie Parker – Spoke about the need for housing and shelter and urged the commission to allocate funding for such activities.

Brenda Landsdale – Spoke about the need for affordable housing for all. She spoke about how homeless and non-homeless need shelter that is affordable.

Megan Miller – Spoke about the need for assistance to homeless in the community.

Carl Spitzmacher – Spoke about the need for homeless services and shelter.

Julie Bass – Spoke about her concern for an additional homeless shelter to the community as well as how that may impact taxes for the community in the long run.

Lisa Lord – Spoke about the need to provide hope to the homeless.

Shyla Patera – Submitted comments via email pertaining to the needs of affordable, accessible, universally designed housing. She also advocated for policy change at the federal level to allow for a reduction in fees to allow people to be housed.

**30 Day Public Comment Period – May 16, 2022 to June 15, 2022:**

Sheila Rice – Submitted comments in regard to CDBG and HOME funding being allocated to housing and how this will have a great impact on the shortage of homes and apartments that are affordable to Great Falls residents.

Shyla Patera – Submitted comments pertaining to the needs of affordable, accessible, universally designed housing. She touched on the need for accessible pathways, sidewalks, and parking in the community. She stated that there is a need for more accessible transportation options in the community. She also advocated for policy change at the federal level to allow for a reduction in fees to allow people to be housed.

Kevin Taggart – Commented that “it is a great idea and we need more of it factored into the numbers annually”.

**Public Meeting – June 21, 2022:**

No comments were received during the public meeting.

**Public Hearing – July 5, 2022:**

Judith Mortensen - Inquired how the housing proposal would solve the homelessness issue. She expressed concern that the proposal would allow people to benefit at the hands of the taxpayers.



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

All public comments were noted, transcribed, or accepted into the Annual Action Plan where applicable. No comments or views were rejected.

## 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 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.

## PR-05 Lead & Responsible Agencies – 91.200(b)

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### Agency/entity responsible for preparing/administering the Consolidated Plan

*Describe the agency/entity 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

**HUD Table 1 – Responsible Agencies**

## Narrative

The Planning and Community Development Department is responsible for administering the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) within the City of Great Falls, Montana. An Annual Action Plan is required by the U.S. Department of Housing and Urban Development (HUD) in order to receive federal assistance annually. The City of Great Falls receives CDBG and HOME funds as an Entitlement Community and Participating Jurisdiction, respectively. The City Commission is required to review and approve the Consolidated Plan and associated Annual Action Plans and will continue to do so in July 2022.

The City of Great Falls will submit the 2022 Annual Action Plan to HUD by July 15, 2022, following the required public comment period and City Commission review. The City program year begins July 1 and ends June 30.

## **Consolidated Plan Public Contact Information**

**On the web:** <https://greatfallsmt.net/planning/consolidated-plan-annual-action-plan>

**Call:** (406) 455-8443 or (406) 455-8432

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

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

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### **Introduction**

The 2022 Annual Action Plan was 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, Public Works, and Park and Recreation. Nonprofit service agencies, affordable housing service providers, and housing developers were heavily involved in the creation and fulfillment of past and current Consolidated Plan goals and are crucial to the further fulfillment of these goals during the 2022 program year.

### **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(l))**

The City will encourage the participation of public and assisted housing residents from the Great Falls Housing Authority and Opportunities, Inc., to provide input to the City on whether their needs in regard to physical health, mental health, and basic services are being adequately met in the community. In response to this input, the City will make every effort to share this feedback with other public, private and non-profit agencies that provide housing, health services, and social services to these residents.

The City partners with the Great Falls Housing Authority to fund a Fair Housing Program Specialist, and the City is actively engaged with the local Continuum of Care to assist with the collaboration of multiple agencies, including mental health and service agencies, to address homelessness. The City also partners with local Economic Development and Affordable Housing agencies to collaborate on enhancing community growth and providing opportunity for low-income individuals.

### **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 City participates in the local Continuum of Care for Homelessness (CoC) group. The CoC group meets monthly 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 people experiencing homelessness. The CoC meetings provide a networking opportunity and assist in keeping funding options open for future HUD homeless grant funds. Since September 2017, the CoC has incorporated a Coordinated Entry System and bi-monthly Case Conferencing meetings. The progression of the CoC has allowed the community service providers to collaborate, partner, and offer wraparound services to address the community's needs.

The City encourages applications 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 entity which addresses homelessness issues and is the main vehicle for organizations in Montana to apply for federal homeless grant funds. If local agencies pursue projects through the MT CoCC, the local CoC will support all appropriate proposals. The City will also encourage our local CoC to undertake activities which will move toward reaching the federal goal of ending chronic homelessness.

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

ESG funds are not projected to be available for the City for Program Years 2020-2024.

**Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

1	<b>Agency/Group/Organization</b>	<b>NEIGHBORWORKS GREAT FALLS</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services - Education Regional Organization Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input on community needs; attended Public Needs Hearing and offered comments; attended meetings with City staff to develop potential project ideas.
2	<b>Agency/Group/Organization</b>	<b>GREAT FALLS DEVELOPMENT AUTHORITY</b>
	<b>Agency/Group/Organization Type</b>	Services - Education Services - Employment Regional Organization Planning Organization Business Leaders Community Development Financial Institution
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input on community needs; attended meetings with City staff to develop potential project ideas for proposed Economic Development funds.
3	<b>Agency/Group/Organization</b>	<b>CITY PARK AND RECREATION - COMMUNITY RECREATION CENTER</b>
	<b>Agency/Group/Organization Type</b>	Services - Children Services - Persons with Disabilities Other Government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Facility/ADA Improvements
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended meetings with City staff to develop potential project ideas for proposed Public Infrastructure funds.
4	<b>Agency/Group/Organization</b>	<b>Great Falls Public Housing Authority</b>
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Fair Housing Other Government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended CoC meetings and bi-monthly Case Conferencing meetings. Attended meetings with City staff to develop potential project ideas for Public Housing Modernization.

5	<b>Agency/Group/Organization</b>	<b>North Central Independent Living Services</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services - Elderly Persons Services - Persons with Disabilities Services - Homeless Services - Fair Housing Regional Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input on community needs; attended Public Needs Hearing and offered comments; attended CoC meetings.
6	<b>Agency/Group/Organization</b>	<b>HELPING HANDS</b>
	<b>Agency/Group/Organization Type</b>	Services – Food & Clothing Services - Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs – Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input on community needs; attended Public Needs Hearing and offered comments; attended CoC meetings.

**HUD Table 2 – Agencies, groups, organizations who participated**

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

The City attempted to contact local public and private agencies with public notice announcements and information via electronic mail as well as traditional and social media platforms. Media outlets included KFBB, KRTV, the Great Falls Tribune, The Electric, and the City's webpage and Facebook page. Our community is noteworthy for its numerous existing social service and housing agencies, and all play a key role in participatory and advisory sessions that shape our Annual Action Plan.

### 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	Coordinates local and statewide housing and services for households experiencing homelessness
City of Great Falls Growth Policy Update	City of Great Falls	Dedicated Housing section informs needs for all four housing goals (Fair and Affordable Housing, Rental Rehabilitation, and Homeownership)
PHA 5-Year and Annual Plan	GFHA, U.S. Department of Housing and Urban Development	Quantifiable goals and objectives for very low to low income needs; including 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 (2015-2019)	City of Great Falls	Goals and strategies that address Fair and Affordable Housing
Comprehensive Housing Affordability Strategy	City of Great Falls	Needs assessment for previous goals and included in previous Strategic Plans (2011-2015; 2015-2019)
Housing Market Demand Assessment for Great Falls, MT	Great Falls Development Authority	Dedicated Housing section informs needs for all four housing goals (Fair and Affordable Housing, Rental Rehabilitation, and Homeownership)

**HUD Table 3 – Other local / regional / federal planning efforts**

### Narrative (or 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(l)).

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. Over the last several years, representatives from Malmstrom have engaged extensively with City staff about the challenges in finding quality and affordable rental housing units for the Malmstrom employees who are unable or choose to live outside of airbase property. In recent years, 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.

## Summary of citizen participation process/Efforts made to broaden citizen participation

*Summarize citizen participation process and how it impacted goal-setting.*

The goals outlined in this Plan are primarily driven by community input through the Community Needs Assessment survey that was incorporated into the Consolidated Plan, a public meeting, a public needs hearing, and the public comment period. The City intentionally provided multiple avenues of public engagement to ensure the priority-setting process was community-driven and inclusive. The 2022 goals reflect the community's identified priorities, which allows for strategic funding in areas of need. These funding priorities will be used by City staff as a guideline for awards throughout the year.

## Citizen Participation Outreach

<b>1</b>	<b>Mode of Outreach: PUBLIC NEEDS HEARING</b>	
	<b>Target of Outreach</b>	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing
	<b>Summary of response/attendance</b>	Eight individuals commented at the Public Needs Hearing on April 5, 2022, while one other presented written comments via email.
	<b>Summary of comments received</b>	Comments received were related to the use of CDBG funds for affordable housing development, as well as prioritizing funding for services. Comments received are included as an appendix and summarized in this document.
	<b>Summary of comments not accepted and reasons</b>	No comments were rejected.
<b>2</b>	<b>Mode of Outreach: PUBLIC MEETING</b>	
	<b>Target of Outreach</b>	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing
	<b>Summary of response/attendance</b>	On June 21, 2022 a public meeting was held during the City Commission meeting to present the City's Plan Goals and solicit input for Program Year 2022 activities and priorities.
	<b>Summary of comments received</b>	No comments were received during the Public Meeting.
	<b>Summary of comments not accepted and reasons</b>	No comments were rejected.
<b>3</b>	<b>Mode of Outreach: PUBLIC HEARING</b>	
	<b>Target of Outreach</b>	Minorities, Persons with disabilities, Non-targeted/broad community, Non-profit agency personnel, faith-based institutions
	<b>Summary of response/attendance</b>	A second Public Hearing was held on July 5, 2022, when the City Commission voted on the 2022 Annual Action Plan. One person commented at the public hearing.
	<b>Summary of comments received</b>	Comment received was in regard to addressing homelessness and a concern about tax payer dollars being used for such activities. Comment received is included as an appendix.
	<b>Summary of comments not accepted and reasons</b>	No comments were rejected.
<b>4</b>	<b>Mode of Outreach: INTERNET OUTREACH</b>	

	<b>Target of Outreach</b>	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing, Non-profit agency personnel, faith-based institutions
	<b>Summary of response/attendance</b>	The City's website and Facebook page were utilized to provide additional sources of Public Notice for the following: public comment period for the proposed Citizen Participation Plan from May 16 – June 15, 2022; Public Needs Hearing on April 5, 2022; public comment period for the proposed Annual Action Plan from May 16 - June 15, 2022; Public Meeting on June 21, 2022; Public Hearing on July 5, 2022; and to host the proposed Citizen Participation Plan and Annual Action Plan drafts for public review, comment, and download.
	<b>Summary of comments received</b>	Comments received are included as an appendix.
	<b>Summary of comments not accepted and reasons</b>	No comments were rejected.
<b>5</b>	<b>Mode of Outreach: NEWSPAPER AD</b>	
	<b>Target of Outreach</b>	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing, Non-profit agency personnel, faith-based institutions
	<b>Summary of response/attendance</b>	Legal Advertisements were placed with the Great Falls Tribune to run on the following dates for the corresponding Public Notices: March 20, 2022 and March 27, 2022 for the April 5, 2022 Public Needs Hearing; May 15, 2022 and May 22, 2022 for the 30-day comment period from May 16, 2022-June 15, 2022 for the proposed Annual Action Plan and Citizen Participation Plan; June 19, 2022 and June 26, 2022 for the July 5, 2022 Public Hearing.
	<b>Summary of comments received</b>	Comments received are included as an appendix.
	<b>Summary of comments not accepted and reasons</b>	No comments were rejected.

**HUD Table 4 – Citizen Participation Outreach**



## AP-15 Expected Resources – 91.220(c)(1,2)

### Introduction

All staff activities used in creating and implementing the Annual Action Plan are provided from the 20% of CDBG funds allotted for Administrative spending.

The expected resources include the annual allocations of CDBG and HOME federal grant funds that Great Falls receives as an Entitlement City and Participating Jurisdiction. The grant amounts are actual allocations for Program Year 2022. If the grant funding or program income comes in above or below the expected amounts identified in the Priority Table below, the project allocations (AP-38 Projects Summary) will be adjusted.

### Anticipated Resources

Program	Source of Funds	Expected Amount Available for Program Year				Expected Amount Available Remainder of ConPlan
		Annual Allocation:	Program Income:	Prior Year Resources:	Total:	
CDBG	public - federal	\$764,295	\$1,747,168	\$501,479	\$3,012,942	\$1,528,590
Uses of Funds	Acquisition, Economic Development, Housing, Public Improvements, Public Services, Admin and Planning					
Description	CDBG funds are anticipated to be \$800,000 annually for the program years 2020-2024.					
HOME	public - federal	\$319,759	\$1,494,280	\$1,001,417	\$2,815,456	\$639,518
Uses of Funds	Acquisition, Homebuyer Assistance, Rehabilitation (Multifamily & Homeowner), New Construction (Multifamily & Homeowner), Admin and Planning					
Description	HOME funds are anticipated to be \$280,000 annually for the program years 2020-2024.					

HUD Table 5 - 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, state, and outside (private) sources of funding. CDBG and HOME projects can maximize their local impact within the Great Falls community when combined with leveraged local resources among area providers.

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

None appropriate.

## AP-20 Annual Goals and Objectives

### Goals Summary Information

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2022	2023	Homeless, Non-Homeless Special Needs, Non-Housing Community Development	City of Great Falls	Public Services	CDBG: \$87,644	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
2	Affordable Housing	2022	2023	Affordable Housing, Homeless, Non-Homeless Special Needs	City of Great Falls	Affordable Housing	HOME: \$2,783,481 CDBG: \$60,000	Homeowner Housing Added: 4 Household Housing Units Rental Units Rehabilitated: 4 Household Housing Units Direct Financial Assistance to Homebuyers: 7 Households Assisted Buildings Demolished: 1 Building
3	Housing Rehabilitation	2022	2023	Affordable Housing, Public Housing, Non-Homeless Special Needs	City of Great Falls	Housing Rehabilitation	CDBG: \$1,370,000	Rental Units Rehabilitated: 34 Household Housing Units Homeowner Housing Rehabilitated: 2 Household Housing Units
4	Fair Housing	2022	2023	Affordable Housing, Public Housing, Homeless, Non-Homeless Special Needs	City of Great Falls	Fair Housing	CDBG: \$27,000	Public service activities other than Low/Moderate Income Housing Benefit: 120 Persons Assisted

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Economic Development	2022	2023	Non-Housing Community Development, Economic Development	City of Great Falls	Economic Development	CDBG: \$166,000	Jobs created/retained: 5 Jobs
6	Public Facilities and Improvements	2022	2023	Public Housing, Non-Homeless Special Needs, Non-Housing Community Development	City of Great Falls	Public Facilities and Improvements	CDBG: \$1,149,439	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted Buildings Demolished: 1 Building
7	Planning and Administration	2022	2023	Planning and Administration	City of Great Falls	Planning and Administration	CDBG: \$152,859 HOME: \$31,975	

HUD Table 6 – Goals Summary

### Program Year 2022 Goal Descriptions

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, substance abuse, underserved youth, and Fair Housing 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, substance abuse 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. This includes rehabilitation, acquisition, demolition, site preparation, and slum and blight activities. The HOME-funded Down Payment Assistance and Owners in Partnership programs will continue with HOME Program Income.
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 through grant funding. Housing efforts to

		remediate properties negatively affected by slum and blighted conditions will be funded through CDBG.
4	<b>Goal Name</b>	<b>Fair Housing</b>
	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	<b>Goal Name</b>	<b>Economic Development</b>
	Goal Description	All Economic Development Activities in 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	<b>Goal Name</b>	<b>Public Facilities and Improvements</b>
	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	<b>Goal Name</b>	<b>Planning and Administration</b>
	Goal Description	City staff to administer, manage, and monitor CDBG and HOME funded activities.

## Introduction

The City of Great Falls will strategically focus on 10 projects for funding from the CDBG and HOME program, which includes funding for administration and planning at the HUD limit.

The Fair Housing Program will be a partnership with the Great Falls Housing Authority. The City will also utilize CDBG funds to carry out the Revolving Loan Fund Program as well as support the Fair Housing Specialist position.

Staff will adjust the recommendations based on Timeliness notifications from HUD. The City is required to have no more than 1.5 times its annual CDBG funding allocation plus program income by May 2nd of every year. Therefore, staff will respond to this HUD requirement as needed, while remaining within the identified and approved priorities.

### Program Year 2022 Projects

	Project Name
1	2022 Public Services
2	2022 Residential Housing Rehabilitation
3	2022 Public Facilities and Improvements
4	2022 Fair Housing Program
5	2022 CDBG Slum and Blight Removal
6	2022 CDBG/HOME Affordable Housing
7	2022 HOME NeighborWorks Direct Assistance to Homebuyers
8	2022 HOME CHDO Project
9	2022 Great Falls Development Authority Job Creation
10	2022 CDBG/HOME Administration

HUD Table 7 – Project Information

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

The recommended funding allocation priorities are primarily driven by community input through a public needs hearing, Neighborhood Council of Councils meeting, and the public comment period. Staff intentionally provided multiple avenues of public engagement to ensure the priority-setting process was community-driven and inclusive. The City of Great Falls' recommendation is to respectfully utilize the community's input in setting these priorities. These community-identified priorities allow for strategic funding in areas of need and will be used by staff as a guideline for awards throughout the year.

## AP-38 Project Summary

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### Project Summary Information

1	<b>Project Name</b>	<b>2022 Public Services</b>
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$87,644
	<b>Description</b>	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, substance abuse, 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 the aforementioned needs.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	300 LMI individuals will benefit from the proposed activity.
	<b>Location Description</b>	City of Great Falls
2	<b>Planned Activities</b>	The City will focus efforts on meeting the needs of our homeless population, health/mental health needs, substance abuse, 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 the aforementioned needs.
	<b>Project Name</b>	<b>2022 Residential Housing Rehabilitation</b>
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$1,370,000

	<b>Description</b>	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 through grant funding. Housing efforts to remediate properties negatively affected by slum and blighted conditions will be funded through CDBG.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	36 LMI households will benefit from this proposed activity.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	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 through grant funding. Housing efforts to remediate properties negatively affected by slum and blighted conditions will be funded through CDBG.
<b>3</b>	<b>Project Name</b>	<b>2022 Public Facilities and Improvements</b>
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Public Facilities and Improvements
	<b>Needs Addressed</b>	Public Facilities and Improvements
	<b>Funding</b>	CDBG: \$949,439
	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	These projects will primarily provide an area benefit to LMI families, an estimated 2000 residents this year.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	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.
<b>4</b>	<b>Project Name</b>	<b>2022 Fair Housing Program</b>
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Fair Housing
	<b>Needs Addressed</b>	Fair Housing
	<b>Funding</b>	CDBG: \$27,000
	<b>Description</b>	This is a shared position with the Great Fall Housing Authority to 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.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	120 LMI families will benefit from the proposed activity.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	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	<b>Project Name</b>	<b>2022 CDBG Slum and Blight Removal</b>
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Affordable Housing, Public Facilities and Improvements
	<b>Needs Addressed</b>	Affordable Housing, Public Facilities and Improvements
	<b>Funding</b>	CDBG: \$210,000
	<b>Description</b>	The City will allocate funding to remediate properties negatively affected by slum and blighted conditions. This will include clearance with the end goal of providing affordable housing opportunities and/or public facility improvements.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 buildings will be demolished under the Slum and Blight National Objective.
	<b>Location Description</b>	City of Great falls
6	<b>Planned Activities</b>	The City will allocate funding to remediate properties negatively affected by slum and blighted conditions. This will include clearance with the end goal of providing affordable housing opportunities and/or public facility improvements.
	<b>Project Name</b>	<b>2022 CDBG/HOME Affordable Housing</b>
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$2,410,518 CDBG: \$50,000
	<b>Description</b>	Allocate HOME Investment Partnerships Program (HOME) funds towards new construction and homeownership. HOME funds will be granted to continue the City's mission to improve and grow the community's affordable housing stock. HOME funding can be utilized towards building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. CDBG will be used for acquisition of properties for the goal of developing affordable housing.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	7 LMI households will benefit from this project.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	Allocate HOME Investment Partnerships Program (HOME) funds towards new construction and homeownership. HOME funds will be granted to continue the City's mission to improve and grow the community's affordable housing stock. HOME funding can be utilized towards building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. CDBG will be used for acquisition of properties for the goal of developing affordable housing.
<b>7</b>	<b>Project Name</b>	<b>2022 HOME-NeighborWorks Direct Assistance to Homebuyers</b>
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$325,000
	<b>Description</b>	NeighborWorks Great Falls will utilize HOME program income to provide direct assistance to first-time homebuyers in the form of down payment assistance, closing costs, or gap financing (OIP). Any activity providing direct assistance through this project will be required to utilize the Recapture Provision as outlined in the AAP and Program Income Plan.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	7 LMI families will benefit from the proposed activity.
	<b>Location Description</b>	City of Great Falls

	<b>Planned Activities</b>	NeighborWorks Great Falls will utilize HOME program income to provide direct assistance to first-time homebuyers in the form of down payment assistance, closing costs, or gap financing (OIP). Any activity providing direct assistance through this project will be required to utilize the Recapture Provision as outlined in the AAP and Program Income Plan.
<b>8</b>	<b>Project Name</b>	<b>2022 HOME CHDO Project</b>
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$47,963
	<b>Description</b>	15% set-aside for HOME CHDO Project
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 1 LMI household will benefit from this project.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	Activities to increase affordable housing stock.
<b>9</b>	<b>Project Name</b>	<b>2022 GFDA Job Creation</b>
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$166,000
	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 LMI jobs created/retained.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	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.
10	<b>Project Name</b>	<b>2022 CDBG/HOME Administration</b>
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$152,859 HOME: \$31,975
	<b>Description</b>	City staff to administer, manage, and monitor CDBG and HOME funded activities.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	n/a - City staff to administer, manage, and monitor CDBG and HOME funded activities.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	City staff to administer, manage, and monitor CDBG and HOME funded activities.

**HUD Table 8 – Projects Summary**

**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. Data from the 2018 American Community Survey 5-year Estimate suggests that minority populations represent less than 14% of the city's total population. When considering areas of minority concentration, [HUD's CPD Mapping Tool](#) indicates that a larger number of minority households live in Census Tracts 3, 4, 7, and 108 when compared to the rest of the city; however, Great Falls does not have any areas of minority concentration according to Federal Financial Institutions Examination Council (FFIEC) data or as defined by HUD Minority Neighborhoods. The city does, however, have areas of low-income concentration, which are defined as areas where 51% of the population has income at or below 80% AMI.

**Geographic Distribution**

Target Area	Percentage of Funds
City of Great Falls	100

**HUD Table 9 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

The City of Great Falls does not allocate funding priorities based on geographic needs. Funding priorities are based on community need and the number of individuals or households that can benefit from the limited amount of funding available. Some allocations are based on an area need and focus efforts in LMI areas with 51% LMI residents as calculated using the HUD area benefit calculation tool. This is the only geographic distinction made by the City of Great Falls.

## 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.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	51
Special-Needs	0
Total	51

**HUD Table 10 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	4
Rehab of Existing Units	40
Acquisition of Existing Units	7
Total	51

**HUD Table 11 - One Year Goals for Affordable Housing by Support Type**

### **Introduction**

The Great Falls Housing Authority (GFHA) is the only Public Housing Authority within the city of Great Falls. GFHA owns and operates one main public housing site (Chowen Springs) and four scattered public housing sites (Austin Hall, Yeoman-Tynes, Russell Apartments, and Sunrise Court). These properties include a total of 490 apartment units that range in size from 1-4 bedrooms. Additionally, GFHA has budget authority for 250 Housing Choice Vouchers (HCVs). The HCV program, formerly known as the Section 8 program, allows private landlords to contract with GFHA, who inspects the units for Housing Quality Standards and subsidizes the rent for the approved tenant.

GFHA also manages two affordable housing properties (Sand Hills and Holland Court), which have 16 apartment units each. Eight units at Sand Hills were funded with City HOME funds and are currently within their affordability period per HOME regulations. Eight units at Holland Court were funded with City HOME funds, and although the period of affordability has expired, GFHA continues to set rent for these units within HOME contract limits.

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

The Housing Authority will continue 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. At the time of this report, the major interior renovations of 34 units have been completed as a part of this project. This modernization project began in 2015 and is expected to take 10 to 15 years to complete, contingent upon funding.

### **Actions 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.

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.

### **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 – 91.220(i)**

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**Introduction**

The City will participate in the local Continuum of Care for Homelessness (CoC) group. The CoC group will meet monthly 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 people experiencing homelessness. The CoC meetings will provide a networking opportunity and assist in keeping funding options open for future HUD homeless grant funds.

The trend of 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 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. The local CoC Chair 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.

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.**

The City of Great Falls does not provide direct assistance to homeless outreach programs. There are a number of agencies within the city that provide special outreach services for homeless persons and their individual needs. The City will continue to work with these organizations to reduce and eventually end homelessness. Opportunities, Inc., continues to be a great resource for the city, facilitating a number of local, state, and federal programs to assist with homelessness. Additionally, NeighborWorks Great Falls, Habitat for Humanity, Rural Dynamics Inc., St. Vincent de Paul of North Central Montana, Volunteers of America, Alliance for Youth, Indian Family Health Clinic, and YWCA, among others, provide services to help prevent homelessness.

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

The City of Great Falls will provide grant funding to address the housing needs of homeless persons through public service activities and its housing rehab program.



**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 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 on that particular day. Overall, there are 52 beds available in the men's shelter and 65 beds in the women's shelter. In an emergency such as life-threatening weather, the Mission will also provide additional mats on the floor for men and women and foldaway cribs for children.

The Rescue Mission's Cameron Family Center accommodates 114 beds and focuses on housing homeless families. The beds are set up in 28 rooms with private bathrooms to provide a more private place for families to be together. The facility also has space available for supportive services including a medical/dental clinic, year-round youth programs, and coordinated social services.

**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 Specialist provides information to landlords and tenants on how to avoid evictions. NeighborWorks Great Falls offers foreclosure prevention counseling and financial assistance as well as rental counseling, while Habitat for Humanity offers foreclosure prevention for their partner families. Additionally, Young Parents Education Center offers individual counseling and group classes to help young adults with life skills, referrals to avoid evictions, assistance with rental applications, and coordination 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.

## **Discussion**

The Center for Mental Health has an adult case manager who provides outreach and wellness checks for chronically homeless people. The Center provides outreach to the mentally ill homeless population and

conducts evaluations to determine whether symptoms of a mental disorder are evident. The agency coordinates 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., provides support to chronically homeless people through screening for homelessness issues during intake, referrals, case management, financial assistance, and job training assistance.

The YWCA provides 30 different human service agencies with vouchers for chronically homeless people to use at its used clothing store. 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, a 911 cell phone lending program, transportation, legal advocacy, resume building, and employment coaching.

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

### Introduction

Great Falls first adopted a zoning ordinance to regulate the use of land and buildings in 1930. The last comprehensive update of these regulations occurred when the Unified Land Development Code was adopted in 2005. The current zoning and subdivision code implements the City's growth policy, Missouri River Corridor Plan, neighborhood plans and Long Range 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 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 reviews development applications to ensure that they are consistent with 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. Existing home prices have greatly increased due to low housing stock. The City's Chief Building Official reports there is also the perception that costs of new building permits are high and require a time-consuming process. However, the total estimated cost for construction permits to build a house is approximately 1% of the structure's value. The building codes may require engineered foundations and this could be a significant cost; however, this 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 timeline for residential permitting is currently averaging approximately a 7-day turnaround time based on the quality of drawing submittals. There is good accessibility to plans examiners and access to inspectors when needed.

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. Additionally, no affordable housing incentives such as reduced lot sizes, setback standards or waived building fees are automatically available to developers of affordable housing. Due to land prices and infrastructure costs, smaller lots are being developed for condensed housing at this time. Additionally, the City has worked very successfully with NeighborWorks Great Falls to use the Planned Unit Development process to create customized development standards to support higher density affordable housing development. As result of this partnership, NeighborWorks has successfully completed the Rockcross Apartments project (124 affordable rental units) as well as currently building affordable homes on its Meriwether Crossing subdivision. This subdivision will lead to the eventual addition of 80 affordable, owner-occupied homes into the City's affordable housing inventory. NeighborWorks has

begun outreach with community stakeholders to seek input for its next affordable housing proposal for property south of Great Falls.

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. Some of those proposed upgrades are cost prohibitive due to some existing mobile home parks being located in the floodplain.

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 are also important to positively impact the quality, permanence, safety and environmental aspects of the Great Falls community.

**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 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. PCD staff are currently working on a minor update to the Growth Policy document that will be followed by a major update to the document during the timeframe of the 2020-2024 Consolidated Plan. This update will address future housing and community development needs.

### Introduction

The Planning and Community Development Department (PCD) administers the CDBG and HOME grant funds that the City is allocated each year. For the 2022 program year, PCD will administer more than one million dollars in funding for projects in public services, affordable housing, housing rehabilitation, fair housing, economic development, and public facilities. These funds come from both federal dollars and program income.

### Actions planned to address obstacles to meeting underserved needs

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

The preservation and development of quality, affordable housing continues to be a priority for the City of Great Falls. The [Consolidated Plan](#) details the overall housing strategy, which was developed based on a market analysis, an assessment of housing needs, and extensive community involvement. Data provided by HUD in the Needs Assessment section of the Consolidated Plan (NA-25) indicates that 28.2% of Great Falls households are cost-burdened, meaning they pay more than 30% of their income on housing needs. The goals listed below, as outlined in the Consolidated Plan, seek to foster and maintain affordable housing, affirmatively further fair housing, and preserve housing choice for households in Great Falls:

**Affordable Housing** Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness. This includes acquisition and affordable housing efforts that require funding to remediate properties negatively affected by slum and blighted conditions, but is not limited to these activities.

**Housing Rehabilitation** Provide construction and rehabilitation assistance for very low to moderate income homeowners, rental 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 projects with the use of grant funding.

**Fair Housing** 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.

The City of Great Falls certifies to affirmatively further fair housing through its housing programs. Progress on actions taken by the City to affirmatively further fair housing will be reported annually in the City's Consolidated Annual Performance and Evaluation Report (CAPER).

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

### **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. 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 paint 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, with homeowners only incurring greater costs 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**

All planned activities for Program Year 2022 will promote the reduction of poverty-level families by providing resources and opportunities to assist low-income individuals to be able to grow and prosper. One specific example is that 15% of the CDBG Budget, approximately \$114,000, will be allocated to

provide public services to reduce the number of poverty-level families. This will provide funding toward public service projects that specifically focus on addressing barriers in the areas of homelessness, health/mental health, substance abuse, youth services, and fair housing. All public service projects must be new and/or expanding services that benefit low-to-moderate income persons.

### **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 continue to further develop and implement best practices to streamline the administration of federal funds. For example, the City recently expanded the size of its Municipal Grant Committee and soon plans to modify its grant application process to implement a compressed grant application cycle as opposed to allowing grants to be filed throughout the program year.

### **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 the 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 that 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 Communications Specialist serves as the Neighborhood Council coordinator and will communicate regularly with City management on issues brought up by the Neighborhood Councils. The Communications Specialist 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 needs and coordinate delivery of services for people experiencing homelessness. The City will continue its close working relationship with the Great Falls Housing Authority. This relationship will include such aspects as sharing of staff, 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 City will complete environmental reviews for all Housing Authority sponsored construction and rehabilitation projects; therefore, the City will be aware of and review any proposed development projects or proposed demolition of public housing units.

The City will work with private and public organizations to foster communication and delivery of information to the public regarding housing and social services to be provided.



### Introduction

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

### 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 of this section. The following Table also identifies program income that is available for use.

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
<b>Total Program Income:</b>	<b>0</b>

### 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.	70.00%

**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 for ONLY development and include NO direct assistance to a homebuyer will follow the resale provisions as required by federal regulation 24 CFR 92.254(a)(5)(i)(A). The HOME funds will be secured with a deed restriction.

The resale option will require that the home remain affordable for the period of affordability by ensuring that, if the property is sold during the period of affordability, that it is sold to an income eligible buyer, that it is affordable to a reasonable range of low to moderate income homebuyers, and that the original buyer receives a fair return, if the market allows.

When defining “*affordable to a reasonable range of low-income homebuyers*” it will mean that the home resale price will be affordable to the individuals or families at or below 80% of AMI. The general standard for affordability is 30% as a maximum percentage of income that a household should dedicate to housing costs. Consequently, what is *affordable to a reasonable range of low-income homebuyers* would be defined as a family at or below 80% of AMI paying no more than 30% of income for principal, interest, property taxes, and insurance.

When defining “*fair market return on investment*” the City will calculate based on an appraisal of the property. To determine the amount of market appreciation, if any, will be done by calculating the difference between the initial and resale appraisals. This figure will represent the basis for calculating the fair return on investment. In a declining market, it is possible that there will not be a return.

**To calculate “*affordable to a reasonable range of low-income homebuyers*” as well as the “*fair market return on investment*”:**

(Resale Appraisal – Initial Appraisal) x Clearly defined standard or index = Fair return on investment to homeowner

Affordable price at sale + Fair return on investment to homeowner = Resale price

Example:

Fair Market Value at Sale (Initial Appraisal): \$200,000

Affordable Price at Sale: \$150,000

Standard or Index: 25%

Fair Market Value at Resale (Resale Appraisal): \$275,000

Increase in Market Appreciation: \$275,000 - \$200,000 = \$75,000

Fair Return on Investment: \$75,000 x .25 = \$18,750

Resale Price: \$150,000 + \$18,750 = \$168,750

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 through NeighborWorks Great Falls (NHS) for its Owners in Partnership (OIP) program where NeighborWorks Great Falls operates as the owner and developer of the properties. NeighborWorks Great Falls is the City's only Community Housing Development Organization (CHDO). All City HOME funds used for first-time homebuyers down payment and closing cost assistance will be through NeighborWorks Great Falls in its role as a HOME grant subrecipient. 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.

NeighborWorks Great Falls will comply with the Recapture Provisions established in §92.254(a)(5)(ii). Recapture permits the original homebuyer to sell the property to any willing buyer during the period of affordability while NeighborWorks Great Falls is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer. Two key concepts in the recapture requirements – *direct subsidy to the homebuyer* and *net proceeds* - must be understood in order to determine the amount of HOME assistance subject to recapture, and the applicable period of affordability on the unit. The recapture approach requires that all or a portion of the *direct subsidy* provided to the homebuyer be recaptured from the *net proceeds* of the sale.

***Direct HOME Subsidy*** - is the amount of HOME assistance, *including any program income* that enabled the homebuyer to buy the unit. The direct subsidy includes down payment, closing costs, interest subsidies, or other HOME assistance provided directly to the homebuyer. In addition, direct subsidy includes any assistance that reduced the purchase price from fair market value to an affordable price. If HOME funds are used for the cost of developing a property and the unit is sold below fair market value the difference between the fair market value and the purchase price is considered to be directly attributable to the HOME subsidy.

**Net Proceeds** - are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Under no circumstances can NeighborWorks Great Falls recapture more than is available from the net proceeds of the sale. The recapture option is used because it is generally easier to administer than the resale option. The recapture option works well when the sale of the property will most likely preserve affordability without the imposition of resale restrictions.

Of the four basic recapture options that are described in the HOME rule and discussed in CPD 12-003, NeighborWorks Great Falls uses “**3. Shared Net Proceeds.**” In this option, the HOME rule states that if the net proceeds are not sufficient to recapture the entire HOME investment or a reduced amount as described above, plus enable the homebuyer to recover the amount of the down payment and any investment in the form of capital improvements made by the homebuyer since purchase, NeighborWorks may share the net proceeds. In practice, this approach has been the most widely used model and has been applied to all recapture situations, not just insufficient net proceeds. Shared net proceeds, in combination with the pro rata reduction over time, is the most commonly used approach.

**To calculate the amount of net proceeds (or shared appreciation) to be returned:**

- 1) Divide direct HOME subsidy by the sum of the direct HOME subsidy and the homebuyer’s investment,
- 2) Multiply by the net proceeds to calculate the amount of HOME investment to return,

$$\frac{\text{Direct HOME Subsidy}}{\text{Direct HOME Subsidy} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{HOME Recapture}$$

**To calculate the amount of net proceeds (or shared appreciation) available to the homebuyer:**

- 1) Divide the homebuyer’s investment by the sum of the direct HOME subsidy and the homebuyer’s investment,
- 2) Multiply by the net proceeds to calculate the amount of homebuyer investment to return to the homebuyer.

$$\frac{\text{Homebuyer Investment}}{\text{Direct HOME Subsidy} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{Amount to Homebuyer}$$

**Written Agreements** – NeighborWorks Great Falls executes a set of HOME written agreements that accurately reflects the recapture provisions with the homebuyer at the time of sale. These detailed written agreements, including an Occupancy Agreement, HOME rider to the Deed of Trust, and Deed Restriction Agreement, ensure that all parties are aware of the specific HOME requirements applicable to the unit (i.e., period or affordability, principal residency requirement, terms and

conditions of either the resale or recapture requirement), and helps NeighborWorks and the City of Great Falls enforce those requirements. When revisions to the recapture provisions in the City of Great Falls Annual Action Plan are submitted, homebuyer written HOME agreements are modified to reflect any changes. The written agreement creates a legal obligation for the City of Great Falls, NeighborWorks and the homebuyer. The HOME written agreements are separate legal documents from any loan instrument and comply with the requirements of §92.504(c)(5) of the HOME rule.

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 for HOME funds used ONLY for development and include NO direct assistance to a homebuyer will contain the following provisions: federal regulation 24 CFR 92.254(a)(5)(i)(A).

- Principal residency requirement (including a separate Home Occupancy Agreement signed by the borrower)
- Deed Restriction will be executed at time of closing and recorded at that time.
- Original Developer gets the right of first refusal to buy back the property
- New buyer must be income eligible
- Remaining resale restrictions apply to the new buyer upon transfer
- There must be a “*fair return on investment*” to the original buyer – if the market supports that
  - “*Fair Return on Investment*” will be calculated based on an appraisal of the property. To determine the amount of market appreciation, if any, will be done by calculating the difference between the initial and resale appraisals. This figure will represent the basis for calculating the fair return on investment. In a declining market, it is possible that there will not be a return.
- The home must be affordable

A Deed Restriction containing the following provisions will be used to enforce HOME Program requirements for activities with both HOME funded development subsidy and HOME funded direct assistance to a homebuyer:

- Principal residency requirement (including a separate Home Occupancy Agreement signed by the borrower)
  - 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 2021. 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 as an appendix.

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 debt secured by multifamily housing that is rehabilitated with HOME funds.

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