

**City of Great Falls
2019-2020 Annual Action Plan**



Prepared by:
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Executive Summary

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

1. Introduction

The City of Great Falls Annual Action Plan for program year 2019 is scheduled for review by the Great Falls City Commission on June 4, 2019 following a 30 day comment period extending from April 17, 2019 through May 17, 2019. City Commission action on the Annual Action Plan follows a plan development process which included the development of the Great Falls and Cascade County Comprehensive Housing Affordability Strategy 2010–2020 (CHAS) undertaken by a diverse community group; input from local organizations; and input from a community assessment, which included one Neighborhood Council of Councils meeting (1/29/2019), a Community Survey, and a public needs hearing (4/2/2019).

The purpose of the Annual Action Plan is to implement the 2015-2019 Consolidated Plan and identify the housing and community development needs of low income people in the community and develop strategies for addressing those needs in a comprehensive, coordinated fashion using available federal and non-federal resources. The Consolidated Plan includes the one year Annual Action Plan for 2019/2020 and serves as the budget for the City of Great Falls 2019/2020 Community Development Block Grant (CDBG) Program and Home Investment Partnership Program (HOME). The City's community grant goals and priorities, recommended for the upcoming year, are described in detail in the Action Plan.

The Consolidated Plan and yearly Annual Action Plan 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.

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

2. 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.

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In the Consolidated Plan, the City of Great Falls chose seven (7) objectives or goals, as displayed in the following table. The 2019 Annual Community Assessment allows the City to identify specific needs to address in the 2019-2020 Grant Year. The Goals identified in relation to community needs are: Economic Development, Residential Housing Rehabilitation, and Public Improvements. Additionally, the City will allocate 15% of CDBG funds to Public Services. It should be noted that all Residential Housing Rehabilitation projects will be serviced through the City's revolving loan fund.

1	Goal Name	Public Improvements
	Goal Description	Provide public facility and infrastructure assistance including handicap accessibility and energy efficiency improvements to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. Other activities that will be funded will primarily address structural deficiencies and basic code upgrades for public facilities and non-profit agencies that serve the general population.
2	Goal Name	Transitional Housing
	Goal Description	Provide assistance for transitional housing with supportive services benefitting homeless or special needs persons. Over the next five years, the City of Great Falls will fund qualified projects to construct or rehabilitate transitional housing with supportive services for the homeless, homeless youth, young parents under the age of 18 years, homeless single head of household families who do not meet criteria for public housing, victims of abuse, and others
3	Goal Name	Public Services
	Goal Description	Provide support to public service agencies operating programs that benefit low to moderate income persons. Over the next five years the City of Great Falls will provide funds to social service agencies to fund scholarships for child and youth day care/recreational/educational programs, purchase food for elderly home meal programs and other activities for the provision of services to low income people.
4	Goal Name	Homeownership
	Goal Description	Provide direct first-time homebuyer assistance to low to moderate income families. Partner agencies have included NeighborWorks Great Falls and Habitat for Humanity using HOME and non-HOME funding.
5	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners with very low to moderate income rental units to upgrade the city's housing stock to meet standard building codes to provide and sustain safe, affordable housing. The City of Great Falls will provide loans to low income homeowners through the Deferred Payment Loan program. The City of Great Falls will provide loans to property owners to rehabilitate rental units that will be rented to low income people through the Rental Improvement Loan program.
6	Goal Name	Fair Housing
	Goal Description	Provide affordable housing opportunities for very low and low income renters, particularly the elderly and/or disabled. The City of Great Falls will continue to provide non-profit, social service agencies with CDBG funds to rehabilitate and subsidize rental housing for the elderly and/or disabled. Project-based rental assisted housing providers should apply for housing upgrades using CDBG dollars (Community Development Council) when available.
7	Goal Name	Economic Development
	Goal Description	Provide funding for projects which create decent paying jobs with benefits for persons from low to moderate income households. The City of Great Falls will fund economic development projects which will result in the creation of jobs for low to moderate income people. Such projects will include funding to the Great Falls Development Authority (GFDA) revolving loan fund to provide gap financing to existing and start-up businesses to create new jobs for low to moderate income people. Economic Development was recently allocated 10% of CDBG dollars in FY 2015 and this allocation is predicted to continue through the next five years.

2015-2019 Goals and Objectives

3. Evaluation of past performance

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

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

In preparation for the planning of the FY18 Grant Year and the Annual Action Plan, the City evaluated past performance. After careful review of the City's practices, it was decided to update the Grant Policies and Citizen Participation Plan to streamline the process to meet the City's current capacity and be more strategic to create a sustainable community grant program. Past performance demonstrated that the City was collaborating with multiple non-profit agencies, relying solely on sub-recipients to reach community goals. The City is now implementing practices that balance the use of sub-recipients and providing direct programming. Another policy change was to narrow the focus to strategically provide larger amounts of funding toward a goal to see a bigger impact. Past performance demonstrated that the City was funding many small grants. Another challenge that was identified is that public facility projects were difficult for non-profits to implement due to the federal requirements. Lastly, past performance also demonstrated that many of the same agencies continuously requested funding. The evaluation of these issues led to updating the Grant Policies, which continue to be implemented in the FY19 Grant Year. The community-identified FY19 Goals are:

Residential Housing Rehabilitation

Provide funding towards low interest loans for property owners, to assist very low to moderate income individuals to bring properties up to code, and upgrade the city's housing stock to provide safe, affordable housing.

Economic Development

Provide funding to assist with the creation of decent paying jobs with benefits for persons from low to moderate income households. In prior years the City has fulfilled this need by providing low-interest loans to new and expanding businesses. After meeting with Great Falls Development Authority, the City identified new opportunities to assist with economic growth. The City plans to encourage job creation

and business growth in the community by providing funding support for microenterprise activity, infrastructure installation, and alleviation of spot slum and blight.

Public Improvements

Enhance public infrastructure such as sidewalks, curb ramps, City facility accessibility and playground equipment to enhance ADA access.

Public Services

Provide funding toward public service projects specifically focused on addressing Youth Services/Childcare, Alcohol and Drug Treatment/Healthcare/Suicide Prevention, Senior Services, Employment Training, and Housing Counseling and Education. The Public Service priorities were identified through extensive community feedback. All public service projects must be new and/or expanding services that benefit low-to-moderate income persons.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Achieving buy-in from members of the community, LMI residents as well as the nonprofit agency leaders who provide services to those residents, is critical to the effective use of CDBG funds throughout the 2015-2019 five year period, including the 2019 Annual Action Plan. A Citizen Participation Plan was approved in April of 2019, which outlines the Citizen Participation Process regarding the Annual Action Plan, Consolidated Plan, and CAPER. This Plan includes public hearings, public comment period, community survey, publishing in local newspapers, Neighborhood Council of Councils meeting, and engagement of community stakeholders. A copy of the Citizen Participation Plan (2019) can be found in Appendix C of this document and online at <http://www.greatfallsmt.net/planning/citizen-participation-plan>.

Two public meetings were used to gather citizen participation in the creation of the Consolidated Plan draft, and a final meeting to review the draft occurred on May 19, 2015 with no public comment. The comments and themes addressed in these meetings were transcribed and attached to this document. Twenty five public agencies, nonprofit agencies, and faith-based representatives attended the March 13, 2015 Community Input meeting, along with the mailing of nearly 200 agency surveys to these same agencies; 15 responded either by mail or email after indicating they could not attend the meeting.

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

5. Summary of public comments

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

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

No public comment was received during the draft 2015-2019 Consolidated Plan 30-day period, lasting from May 2 - May 31, 2015. No comments were provided at the May 19 City Commission public meeting, nor via email/mail or telephone correspondence.

All comments received during the 30-day comment period from April 17 – May 17, 2019, are summarized and/or attached to the 2019 Annual Action Plan.

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

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

7. Summary

The needs of the Great Falls community are greater than the funding provided from the entitlement community's CDBG funds or participating jurisdiction's HOME funds. Despite this, coordination of public and nonprofit leaders 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)

1. 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

Table 1 – Responsible Agencies

Narrative (optional)

The Planning and Community Development Department is responsible for administering Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs within the City of Great Falls, Montana. A Consolidated Plan including Annual Action Plans are required by U.S. Housing and Urban Development (HUD) in order to receive federal assistance annually. The City of Great Falls has received these funds as an entitlement community and participating jurisdiction, respectively. The City Commission reviews and approves the Annual Action Plan and will continue to do so in 2019.

The City of Great Falls is seeking HUD approval for the 2019 Annual Action Plan in June 2019 following the required thirty (30) day public comment period and City Commission approval. The City program year begins July 1 and ends June 30.

Consolidated Plan Public Contact Information

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

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

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

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

Creation of the 2019 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). Nonprofit service agencies and affordable housing agencies were heavily involved in both the creation and fulfillment of past Consolidated Plan goals and objectives and are crucial to the further fulfillment of those goals throughout the five-year period.

Sources of public data used in creating the plan include: U.S. Department of Housing and Urban Development (HUD User, CHAS, Office of Community Planning and Development), National Low Income Housing Coalition, Montana Department of Public Health and Human Services (2014 and 2015 Montana Homeless Survey), Montana Human Rights Bureau (AI), and the U.S. Bureau of the Census. Individual interviews were used for updated information from partner agencies and all citizen participation meetings were documented as appendices with attendance.

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

The City enhances the coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies by practicing the outreach efforts identified in the Citizen Participation Plan adopted on April 2, 2019. In addition to these outreach efforts, the City collaborates with multiple agencies to achieve the goals identified in the Consolidated Plan. As mentioned prior, the City partners with the Great Falls Housing Authority to fund a Fair Housing Program Specialist. The City is also 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 last survey was held on January 31, 2019 and included volunteers surveying the Great Falls area on foot.

The City will continue to help facilitate the local Continuum of Care for Homelessness (CoC) group. The CoC group now 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 homeless people. The City will assist with the facilitation of the meetings. The CoC meetings provide a networking opportunity and assistance 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 need.

The City encourages local 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 addresses homelessness issues and is the main vehicle for organizations in Montana to apply for federal homeless grant funds. Unfortunately, the Great Falls community has not been awarded any federal homeless grant funds, despite the best efforts to submit applications to the State. If local agencies pursue projects through the MT CoCC, the CoC will continue to support all appropriate proposals. In addition, the City will continue to encourage application for federal homeless grant funds for such projects through the MT CoCC statewide application process. The City will remain proactive in attempting to bring federal homeless grant funds into the Great Falls community, as it is much needed.

The City will also encourage the CoC to undertake activities which will move toward reaching the federal goal of ending chronic homelessness. Although no agencies in Great Falls other than Opportunities, Inc., have received any federal homeless grant funding for more than 12 years, the City will cooperate with the MT CoCC as much as possible to meet whatever requirements are established.

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

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 from the city PY 2015-2019.

2. 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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	NEIGHBORWORKS GREAT FALLS
	Agency/Group/Organization Type	Housing Services - Housing Services-Education Regional organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded/distributed community surveys, provided input on community needs, attends CoC meetings, and attended meetings with staff to better understand possible uses of HOME funds.
2	Agency/Group/Organization	Rural Dynamics, Inc.
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Financial Education/Coaching
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs

3	Agency/Group/Organization	GREAT FALLS DEVELOPMENT AUTHORITY
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Planning organization Business Leaders Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs, and attended multiple meetings with City staff to develop potential project ideas for proposed Economic Development funds.
4	Agency/Group/Organization	QUALITY LIFE CONCEPTS
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs

5	Agency/Group/Organization	MONTANA INSTITUTE OF FAMILY LIVING/PARK MANOR
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
6	Agency/Group/Organization	GREAT FALLS AREA HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Housing Services - Housing Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs
7	Agency/Group/Organization	CITY PARK AND RECREATION - COMMUNITY RECREATION CENTER
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Facilities/ADA Improvements

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded/distributed community surveys, and provided input on community needs.
8	Agency/Group/Organization	Great Falls Rescue Mission
	Agency/Group/Organization Type	Services-homeless Religious Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded/distributed community surveys, provided input on community needs, and attends CoC meetings and bi-monthly case conferencing meetings
9	Agency/Group/Organization	Family Promise of Great Falls
	Agency/Group/Organization Type	Services-homeless Religious Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded/distributed community surveys, provided input on community needs, and attends CoC meetings and bi-monthly case conferencing meetings
10	Agency/Group/Organization	CENTER FOR MENTAL HEALTH
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	They were consulted through the community survey and the CoC. The outcome will improve overall community collaborations. Attends monthly COC meetings and bi-monthly case conferencing meetings.
11	Agency/Group/Organization	Great Falls Senior Citizens Center
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Elderly Services/Need
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Responded/distributed community surveys and provided input on community needs
12	Agency/Group/Organization	Great Falls Public Housing Authority
	Agency/Group/Organization Type	PHA Service-Fair Housing Other government - Local

	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded/distributed community surveys, provided input on community needs, and attends CoC meetings and bi-monthly case conferencing meetings
13	Agency/Group/Organization	INDIAN FAMILY HEALTH CLINIC
	Agency/Group/Organization Type	Services-Health Health Agency Regional organization
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Responded/distributed community surveys, provided input on community needs, attends monthly COC meeting
14	Agency/Group/Organization	OPPORTUNITIES INCORPORATED
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Health Services-Education Services-Employment Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded/distributed community surveys, provided input on community needs, and attends CoC meetings and bi-monthly case conferencing meetings; is the lead HMIS agency for Great Falls
15	Agency/Group/Organization	YOUNG PARENTS EDUCATION CENTER
	Agency/Group/Organization Type	Services - Housing Services-Education Services-Employment Service-Fair Housing Childcare
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Responded/distributed community surveys, provided input on community needs, attends monthly COC meetings

16	Agency/Group/Organization	YWCA
	Agency/Group/Organization Type	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded/distributed community surveys, provided input on community needs, and attends CoC meetings and bi-monthly case conferencing meetings
17	Agency/Group/Organization	St. Vincent de Paul
	Agency/Group/Organization Type	Services - Housing Services-homeless Food Boxes
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded/distributed community surveys, provided input on community needs, provides funding support for the Fair Housing Specialist position, and attends CoC meetings and bi-monthly case conferencing meetings. Participant in April 2016 Veteran Homelessness Forum.
18	Agency/Group/Organization	VOLUNTEERS OF AMERICA
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Employment

What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Veterans
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attends bi-monthly Case Conferencing meetings hosted by City, CoC meetings; participant in April 2016 Veteran Homelessness Forum

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

The City contacts local agencies through print media (newspapers), monthly Continuum of Care meetings, as well as through the 2010-2020 Comprehensive Housing Affordability Study (CHAS) undertaken over several years. 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	In 2017 multiple agencies assisted in creating a strategy for ending Veteran's homelessness and in 2019, the strategy continues to be implemented.
City of Great Falls Growth Policy Update	City of Great Falls	Dedicated Housing section informs needs for all four housing goals (fair, affordable, rental rehab, homeownership)

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

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. Malmstrom Air Force Base is also adjacent but outside city limits. The Comprehensive Housing Affordability Strategy (CHAS) for

2010-2020 was conducted by a “Great Falls/Cascade County Housing Planning Group” to consider both city and county housing needs. The City of Great Falls has multiple building inspectors, one of whom is Lead Certified. Additionally, the City’s Community Loan Specialist is Lead Certified and will be consulted with all Lead-Based Paint Strategies for HOME and CDBG projects.

AP-12 Participation – 91.105, 91.200(c)

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

The FY19 Goals are completely driven by community input through a community survey, Neighborhood Council of Councils meeting, public hearing, and public comment period. The City intentionally provided multiple avenues of public engagement to ensure the priority-setting process was community driven and inclusive. The FY19 Goals utilize 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

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Non-targeted/broad community	Notice of public hearing was given in the local news publication according to HUD guidelines. Additional, direct outreach was made to neighborhood councils and key stakeholder agencies. One stakeholder agency attended the public hearing and made comments regarding community outreach, specifically about focus groups.	The stakeholder agency in attendance provided comments regarding community outreach, specifically about focus groups.	No comments were rejected.	
2	Public Meeting	Non-targeted/broad community	Attended Neighborhood Council of Councils Meeting on 1/29/19		No comments rejected.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Community Survey	Non-targeted/broad community	The Community Survey was available to the public January 14 - February 18, 2019. It was available online as well as at the Planning and Community Development office and the City's Public Library. The City received 318 survey responses.	Community responses reflected the following priorities for the use of CDBG and HOME funds: Residential Housing Rehabilitation, Economic Development, and Public Improvements.	No comments rejected.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Stakeholder Meetings	One-on-One Stakeholder Agency Meetings	One-on-one stakeholder agency meetings were held with lead agencies within the community.	The City met with Great Falls Development Authority, the lead Economic Development stakeholder in Great Falls, to discuss the need in the community and best practices to address those needs. Through the discussion with GFDA, two key strategies were identified: Microenterprise Assistance and Infrastructure Improvements. The City also met with NeighborWorks Great Falls, the largest Affordable Housing provider and developer in Great Falls, to discuss housing needs and strategies for HOME Grant	No comments rejected.	25

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

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

The expected resources include the CDBG and HOME Federal Grant Funds annual allocation as an Entitlement City. The grant amounts are estimated using last year’s allocation. If the grant funding comes in above or below the expected amount identified in the Priority Table below, the project allocations (AP-38 Projects Summary) will be adjusted based on the percentage increased or decreased.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	794,666	522,540	459,590	1,776,796	1,776,796	CDBG funds are anticipated to be \$700,000 annually for the program years 2016-2020, program income includes revolving loan funds and is estimated based on prior year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	273,088	273,288	597,380	1,143,756	1,143,756	HOME funds are anticipated to be \$180,000 annually for the program years 2016-2020, program income includes revolving loan fund and is estimated based on prior year. All HOME funded projects, except planning and admin, will include a 25% match of non-federal funds by the subrecipient facilitating the project.
General Fund	public - local	Admin and Planning Public Improvements Public Services	0	0	0	0	0	

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

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

None appropriate.

Discussion

N/A

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Economic Development	2016	2020	Non-Housing Community Development Economic Development	City of Great Falls	Economic Development	CDBG: \$418,662	Jobs created/retained: 10 Jobs
2	Public Improvements	2016	2020	Public Housing Non-Homeless Special Needs Non-Housing Community Development	City of Great Falls	Public Improvements	CDBG: \$372,144	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4624 Persons Assisted
3	Public Services	2016	2020	Non-Homeless Special Needs Non-Housing Community Development	City of Great Falls	Public Services	CDBG: \$104,000	Public service activities other than Low/Moderate Income Housing Benefit: 491 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Housing Rehabilitation	2016	2020	Affordable Housing	City of Great Falls	Fair and Affordable Rental Housing Housing Rehabilitation Public Services	CDBG: \$522,540	Rental units constructed: 5 Household Housing Unit Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Rehabilitated: 10 Household Housing Unit
5	Homeownership	2016	2020	Affordable Housing	City of Great Falls	Homeownership Housing Rehabilitation	HOME: \$858,423	Homeowner Housing Added: 5 Household Housing Unit Homeowner Housing Rehabilitated: 5 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Economic Development
	Goal Description	The community identified the need of Economic Development funding to assist with the creation of decent paying jobs with benefits for persons from low to moderate income households. In prior years the City has fulfilled this need by providing low-interest loans to new and expanding businesses. After meeting with Great Falls Development Authority, the City identified new opportunities to assist with economic growth. In FY19 the City will provide funding towards Microenterprise Assistance and Infrastructure with the ultimate goal of job creation.
2	Goal Name	Public Improvements
	Goal Description	The 2019 annual community needs assessment identified Public Improvements as the third priority. The allocation will provide funding to enhance public infrastructure such as sidewalks, curb ramps, City facility accessibility and playground equipment to enhance ADA access.

3	Goal Name	Public Services
	Goal Description	The 2019 annual community needs assessment identified Public Services as the sixth priority. This will provide funding towards public service projects, specifically focused on addressing Youth Services/Childcare; Alcohol and Drug Treatment/Healthcare/Suicide Prevention; Senior Services; Employment Training; and Housing Education and Counseling. The Public Service priorities were identified by the received community feedback. All public service projects must be new and/or expanding services that benefit low-to-moderate income persons.
4	Goal Name	Housing Rehabilitation
	Goal Description	The annual community assessment identified Residential Housing Rehab as the first priority. The goal is to provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners with very low to moderate income rental units to upgrade the city's housing stock to meet standard building codes to provide and sustain safe, affordable housing. The City of Great Falls will provide loans to low income homeowners through the Deferred Payment Loan program. The City of Great Falls will provide loans to property owners to rehabilitate rental units that will be rented to low income people through the Rental Improvement Loan program.
5	Goal Name	Homeownership
	Goal Description	HOME Investment Partnership Program (HOME) funds will be utilized towards new construction and homeownership. HOME funds, approximately \$858,423, will be able to be granted to continue to further the City's mission to improve and grow the 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.

Projects

AP-35 Projects – 91.220(d)

Introduction

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

Five projects are exclusively funded through the CDBG program, whereas the Fair Housing Program will be a partnership with the Great Falls Housing Authority. The CDBG program is proposed to fund Residential Housing Rehab, Economic Development, Public Improvements, Public Services, the Loan Program Specialist, and a Fair Housing Program Specialist. Public Service projects will not exceed the 15% HUD limitation. The City will accept applications starting July 1st, 2019 that will address the strategic annual goals.

Staff will adjust the percent recommendations by zero to ten percent based on Timeliness need. The City is required to have no more than 1.5 times of their annual allocation by May 2nd of every year. Therefore, staff will respond to this HUD requirement as needed, while remaining within the identified and approved priorities.

Projects

#	Project Name
1	2019 Residential Housing Rehab
2	2019 Economic Development
3	2019 Public Improvements
4	2019 Public Services
5	2019 Fair Housing Specialist
6	2019 Loan Program Specialist
7	2019 CDBG/HOME Administration
8	2019 HOME Investment Partnership Program
9	2019 CHDO Project

Table 7 - Project Information

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

The funding allocation priorities recommended are completely driven by community input through a community survey, neighborhood council meetings, public hearing, and 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 chosen top three priorities, as well as continue to allocate a percentage of funds to Public Services not to exceed the 15% limit set by HUD. 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
Project Summary Information

1	Project Name	2019 Residential Housing Rehab
	Target Area	City of Great Falls
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation Fair and Affordable Rental Housing
	Funding	CDBG: \$522,540
	Description	This will provide funding towards low interest loans for property owners, to assist very low to moderate income individuals to bring properties up to code, and upgrade the city's housing stock to provide safe, affordable housing.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	15 LMI Families will benefit from the proposed activity.
	Location Description	City of Great Falls
	Planned Activities	This will provide funding towards low interest loans for property owners, to assist very low to moderate income individuals to bring properties up to code, and upgrade the city's housing stock to provide safe, affordable housing.
2	Project Name	2019 Economic Development
	Target Area	City of Great Falls
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$418,662
	Description	The community identified the need of Economic Development funding to assist with the creation of decent paying jobs with benefits for persons from low to moderate income households. In prior years the City has fulfilled this need by providing low-interest loans to new and expanding businesses. After meeting with Great Falls Development Authority, the City identified new opportunities to assist with economic growth. In FY19 the City will provide funding towards Microenterprise Assistance and Infrastructure with the ultimate goal of job creation.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	10 jobs will be created for LMI individuals from the proposed activity.
	Location Description	City of Great Falls
	Planned Activities	The community identified the need of Economic Development funding to assist with the creation of decent paying jobs with benefits for persons from low to moderate income households. In prior years the City has fulfilled this need by providing low-interest loans to new and expanding businesses. After meeting with Great Falls Development Authority, the City identified new opportunities to assist with economic growth. In FY19 the City will provide funding towards Microenterprise Assistance and Infrastructure with the ultimate goal of job creation.
3	Project Name	2019 Public Improvements
	Target Area	City of Great Falls
	Goals Supported	Public Improvements
	Needs Addressed	Public Improvements
	Funding	CDBG: \$372,144
	Description	This project will provide funding to enhance public infrastructure such as sidewalks, curb ramps, City facility accessibility and playground equipment to enhance ADA access. The Public Improvements designation will include that, at minimum, 20% of the total annual budget must be specifically allocated to retrofit ADA Access projects.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	These projects will primarily provide an area benefit to LMI Families.
	Location Description	City of Great Falls
	Planned Activities	This project will provide funding to enhance public infrastructure such as sidewalks, curb ramps, City facility accessibility and playground equipment to enhance ADA access. The Public Improvements designation will include that, at minimum, 20% of the total annual budget must be specifically allocated to retrofit ADA Access projects.

4	Project Name	2019 Public Services
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$83,077
	Description	This will provide funding towards public service projects, specifically focused on addressing Youth Services/Childcare, Alcohol and Drug Treatment/Healthcare/Suicide Prevention, Senior Services, Employment Training, and Housing Counseling and Education. The Public Service priorities were identified by the received community feedback. All public service projects must be new and/or expanding services that benefit low-to-moderate income persons.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	50 LMI Families will benefit from the proposed activity.
	Location Description	City of Great Falls
	Planned Activities	This will provide funding towards public service projects, specifically focused on addressing Youth Services/Childcare, Alcohol and Drug Treatment/Healthcare/Suicide Prevention, Senior Services, Employment Training, and Housing Counseling and Education.
5	Project Name	2019 Fair Housing Specialist
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Fair and Affordable Rental Housing
	Funding	CDBG: \$21,158
	Description	Partner with Great Falls Housing Authority to provide funding towards a Fair Housing Specialist, to ensure Fair Housing needs are addressed within the City through education, collaboration, and case management.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	80 LMI Families will benefit from the proposed activity.
	Location Description	City of Great Falls
	Planned Activities	Partner with Great Falls Housing Authority to provide funding towards a Fair Housing Specialist, to ensure Fair Housing needs are addressed within the City through education, collaboration, and case management.
6	Project Name	2019 Loan Program Specialist
	Target Area	City of Great Falls
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$60,727
	Description	Administrative staff to facilitate Rehab Loan Program.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	15 LMI Families will benefit from the proposed activity.
	Location Description	City of Great Falls
	Planned Activities	Administrative staff to facilitate Rehab Loan Program.
7	Project Name	2019 CDBG/HOME Administration
	Target Area	City of Great Falls
	Goals Supported	Public Improvements Public Services Homeownership Housing Rehabilitation
	Needs Addressed	Public Improvements Public Services Homeownership Housing Rehabilitation

	Funding	CDBG: \$158,933 HOME: \$27,308
	Description	Staff to Administer, Manage, and Monitor the CDBG and HOME Grant.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A- Staff to Administer, Manage, and Monitor the CDBG and HOME Grant.
	Location Description	City of Great Falls
	Planned Activities	Staff to Administer, Manage, and Monitor the CDBG and HOME Grant.
8	Project Name	2019 HOME Investment Partnership Program
	Target Area	City of Great Falls
	Goals Supported	Homeownership Housing Rehabilitation
	Needs Addressed	Homeownership Housing Rehabilitation Fair and Affordable Rental Housing
	Funding	HOME: \$858,423
	Description	HOME Investment Partnership Program (HOME) funds towards new construction and homeownership. HOME funds, will be granted to continue the City's mission to improve and grow the 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.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	10 LMI Families will benefit from the proposed activity.
	Location Description	City of Great Falls

	Planned Activities	HOME Investment Partnership Program (HOME) funds towards new construction and homeownership. HOME funds, approximately will be granted to continue the City's mission to improve and grow the 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.
9	Project Name	2019 CHDO Project
	Target Area	City of Great Falls
	Goals Supported	Homeownership Housing Rehabilitation
	Needs Addressed	Homeownership Housing Rehabilitation Fair and Affordable Rental Housing
	Funding	HOME: \$40,963
	Description	15% set-aside for HOME CHDO Project
	Target Date	7/1/2020
	Estimate the number and type of families that will benefit from the proposed activities	At least 2 Low-Income Households will benefit from this project
	Location Description	City of Great Falls
	Planned Activities	Increasing the affordable housing stock.

AP-50 Geographic Distribution – 91.220(f)

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

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

Geographic Distribution

Target Area	Percentage of Funds
City of Great Falls	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

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	15
Special-Needs	0
Total	15

Table 9 - 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	7
Rehab of Existing Units	8
Acquisition of Existing Units	0
Total	15

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

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

The GFHA currently manages five public housing sites and two affordable housing sites. These facilities provide 490 units to income qualifying residents through the GFHA's subsidized housing program and another 32 units that are not subsidized but are affordable to low/moderate income households through the GFHA's affordable housing programs.

The GFHA is also a manager for Housing Choice Vouchers, formerly known as the Section 8 Program. This program allows private landlords to contract with the GFHA, who inspects the home for Housing Quality Standards and subsidizes the rent for the approved client.

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

CDBG funds were awarded to the GFHA in 2015 for redesign, removal, and replacement of all concrete, asphalt, sidewalks, parking lots, and ADA ramps around their Holland Court housing units. Eight units are currently ADA accessible units.

CDBG funds were awarded to the GFHA in 2016 to replace the existing fire alarm system in their Austin Hall apartments with a new system that is up to code. All apartments within Austin Hall serve as homes for the elderly or people who need housing assistance due to a disability. Five units are currently ADA accessible units.

CDBG funds were awarded to the GFHA in 2017 to replace two new boilers and a security door entry system in their Austin Hall apartments and 40 new furnaces in Parkdale Community.

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

The GFHA does not provide direct involvement in management and 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.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City will assist with the facilitation of 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 homeless people. The City will provide support to the meetings. The CoC meetings will provide a networking opportunity and assist in keeping funding options open for future HUD homeless grant funds.

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

The 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. In addition, the City will encourage application for federal homeless grant funds for such projects through the MT CoCC statewide application process.

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

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

The City will also continue to work with a number of organizations within the city 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, and Rural Dynamics, Inc., provide services to help prevent homelessness.

The City of Great Falls does not provide direct assistance to homeless outreach programs. There are a

number of agencies that provide special outreach services for homeless persons and their individual needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

During the 2019/2020 program year, the City of Great Falls will provide grant funding towards addressing the housing needs of homeless persons through public service activities and a 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 (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 71 beds available in the men's shelter and 74 beds in the women and family shelter. The number of people who can be housed at the women and family shelter depends on the composition of the family. In an emergency such as life threatening weather, the Rescue Mission will also provide an additional 20 mats on the floor for men and five mats and foldaway cribs for women and children.

The Rescue Mission has recently constructed the Cameron Family Center, a ~43,000 square foot facility that 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

office provides opportunities for training for landlords and tenants on how to avoid evictions. NeighborWorks Great Falls offers foreclosure prevention loans, 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 eviction, 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 will have an adult case manager who will provide outreach and wellness checks for chronically homeless people. The Center will do outreach with the mentally ill homeless population and will evaluate to determine whether symptoms of a mental disorder are evident. The agency will coordinate with organizations such as Opportunities, Inc., Office of Public Assistance, Great Falls Rescue Mission, Salvation Army and St. Vincent DePaul to provide assistance with housing, food, clothing and payee services.

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

The YWCA will provide 30 different human service agencies with vouchers for chronically homeless people to use at its used clothing store. The 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 will provide community resource information through group sessions provided by staff members.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Great Falls first adopted a zoning ordinance to regulate the use of land and buildings in 1930. A complete re-write was undertaken and the Unified Land Development Code was adopted in 2005. The new code implements the City's comprehensive plan, Missouri River Corridor Plan, neighborhood plans and its 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 and approval of all proposed development within the city; and, 3) to safeguard the public health, safety and general welfare by establishing minimum standards for design and development.

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

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

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 size, setback or building fees are available to developers of affordable housing. Creating such incentives has been discussed. Currently, no affordable housing zoning ordinances exist. In order to build homes on small lots, a zoning variance is needed through the City's Board of Adjustment. This board has meetings scheduled monthly.

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

the cost of housing, these standards also dictate the quality, permanence, safety and environmental aspects of a community.

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 public and parties that are interested in the policies.

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

Discussion:

The 2015-2019 Analysis of Impediments to Fair Housing, as part of the 2015-2019 Consolidated Plan, provides greater detail into the barriers and impediments to both fair and affordable housing in our community.

AP-85 Other Actions – 91.220(k)

Introduction:

The Planning and Community Development (PCD) department administers the CDBG and HOME grant funds that the City is allocated each year. For the 2019/2020 program year the PCD will administer over one million dollars in funding for projects in affordable housing, public facilities, and public services areas. These funds come from both federal dollars and program income.

Actions planned to address obstacles to meeting underserved needs

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

The following projects proposed for allocation of 2019/2020 CDBG funds will benefit people with disabilities: 1) at least 20% of the annual allocation dedicated to ADA Access Projects; and 2) a Fair Housing Program Specialist dedicated to community outreach and case management.

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

Actions planned to foster and maintain affordable housing

Affordable housing will be one of the highest priorities to be addressed by the City. The City proposes to allocate \$1,500,000 from the HOME Grant, Residential Rehab Program, and Fair Housing Program annual budgets to affordable housing activities. The overall housing strategy is described in detail in the Consolidated Plan. The strategy was developed based on a market analysis, an assessment of housing needs and extensive community involvement.

By regulation, at least 15% of HOME funds must be set-aside for a Community Housing Development Organization (CHDO). Thus far, NeighborWorks Great Falls is the only CHDO in the community, they will be allocated at least. The majority of the projects which will address affordable housing will be implemented through a variety of City and nonprofit housing programs.

Actions planned to reduce lead-based paint hazards

Preventive and rehabilitative measures will be taken in all CDBG and HOME funded housing and public

facilities projects that serve young children to ensure the extinction of lead-based paint hazards. All rehabilitation projects in which the building was constructed before 1978 will address lead-based paint regulations. Information about lead-based paint hazards will be provided to all people who apply for City housing rehabilitation loans. 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 and the only added cost to the homeowner is if a contractor has to be hired. The City will provide outreach activities for lead-based paint hazards through notifying contractors of the availability of lead-based paint certification classes if certified private companies hold such classes during the upcoming year. Lead-based paint hazards will be taken into consideration on all pertinent CDBG-funded projects being undertaken by sub-grantees.

Actions planned to reduce the number of poverty-level families

All planned 2019/2020 activities 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 15% of the CDBG Budget, approximately \$119,999 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 Youth Services/Childcare, Alcohol and Drug Treatment/Healthcare/Suicide Prevention, Senior Services, Employment Training, and Housing Counseling and Education. The Public Service priorities were identified by the received community feedback. All public service projects must be new and/or expanding services that benefit low-to-moderate income persons.

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

Actions planned to develop institutional structure

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

Actions planned to 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 encourage collaboration and to help reduce duplication of programs. The City will emphasize efficient service delivery for local, state and federal programs and identify and overcome gaps in institutional structure for carrying out the previously described strategies developed to address the priority needs.

The nine Neighborhood Councils will meet on a regular basis to discuss neighborhood issues. It is anticipated local non-profit agencies and governmental departments will use Neighborhood Council meetings as a forum to disseminate information about their organizations. There will be an ongoing agenda item at all City Commission meetings to give Neighborhood Council members an opportunity to report on specific issues of concern. The Neighborhood Councils will hold three Council of Council meetings in the upcoming year to discuss matters of citywide importance. The City Communications Specialist also 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 needed services and coordinate delivery of services for homeless people. The City will continue its close working relationship

with the Housing Authority. This relationship will include such aspects as sharing of staff, review of loan requests, environmental clearances and fair housing activities. The City Commission appoints the Housing Authority Board of Commissioners and the city manager appoints the executive director of the Housing Authority. Housing Authority staff is made up of City employees. The Housing Authority board acts as a loan committee and reviews loan requests for the City's CDBG-funded housing rehabilitation programs. This agreement was last reviewed in 2016. The City will do environmental reviews for all Housing Authority sponsored construction and rehabilitation projects; therefore, the City will be aware of and review any proposed development sites or proposed demolition of public housing.

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

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

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

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

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:

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

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

All HOME funded activities for homebuyer assistance and rehabilitation will be within the HOME affordable homeownership limits, based on the 95% median purchase price of the area determined by Federal FHA single family mortgage program data, provided by HUD annually for Cascade County. Please visit <https://www.hudexchange.info/resource/2312/home-maximum-purchase-price-after-rehab-value/> for the 2018 HOME limits.

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

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

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

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

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

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

