

City of Great Falls, Montana

2010 - 2015 Analysis of Impediments to Fair Housing Choice Update for 2012

The City of Great Falls affirms our commitment to provide equal housing to all people and that every citizen has a right to live where they choose, without fear of discrimination.

March 2013

Introduction: HUD Fair Housing Requirements

The U.S. Department of Housing and Urban Development (HUD) requires communities that administer Community Planning and Development (CPD) programs to implement procedures to affirmatively further fair housing. For the HUD Funding Program Year 2012, the City of Great Falls received \$718,203 for CDBG and \$232,508 in HOME grant funds. This is a decrease from \$845,010 for CDBG and \$385,292 in Home grant funds from HUD Program Year 2011.

The CDBG program contains a regulatory requirement to affirmatively further fair housing and a second requirement that grantees certify that they will affirmatively further fair housing. This holds true for the HOME program, also.

As part of the jurisdiction's obligation to affirmatively further fair housing, Great Falls as an entitlement community, must undertake the completion of an Analysis of Impediments to Fair Housing Choice (AI).

Funding for this analysis was accomplished using HUD entitlement funds for administration activities in Great Falls.

The intent of this update is to evaluate data used in the 2010 -2015 AI for Great Falls, Montana; review the original impediments that were identified; determine if the impediments still exist; review actions and effectiveness of actions taken during calendar year 2012; identify new impediments that may exist and actions necessary for any newly identified impediments.

Minority Concentration in Great Falls

A review of the 2000 census reveals that there are several concentrations of minority races in Great Falls: American Indian’s located in all census tracts with the highest concentrations in tracts seven (7), nine (9) and 16; Hispanic or Latino in all census tracts with the highest concentration in tracts three(3), 12, and 16. Please note that Malmstrom Air Force Base is located in tract 12. We expect the new census tracts to be out in 2013. Note: Information for Census Tracts will be in the 2014 update.

Fair Housing Complaints

The Fair Housing Specialist for the City of Great Falls received 817 complaints and information calls during calendar year 2012 (a decrease from 871 in 2011) of which six alleged housing discrimination versus 14 in 2011. The table below gives the statistics for fair housing complaints based upon federal and state protective classes.

Great Falls Fair Housing complaints filed from January 2012 through December 2012				
<u>Protected Class</u>	HUD*	Montana Fair Housing**	Montana Human Rights Bureau***	Great Falls Fair Housing****
Race	2	5	0	0
Color	0	0	0	0
Religion	0	0	0	1
Sex/gender	0	0	0	1
Disability	5	7	1	3
Familial Status	0	5	0	0
National Origin	0	0	0	0
Martial Status	0	3	0	1
Age	0	0	0	0
Creed	0	0	0	0

(Source: Freedom of Information Request with HUD, personal contact via e-mail Mt Human Rights Bureau and Montana Fair Housing.)

*Five of HUD's cases ended due to successful conciliation or settlement.

**Montana Fair Housing had one filing and that was for a disability case.

*** This case is still open.

****All complaints received are referred to HUD, Montana Human Rights Bureau, or Montana Fair Housing.

Testing

Montana Fair Housing has and will continue to perform testing in Great Falls. In 2012 five tests were performed on housing providers. These test resulted in two test identifying no differences in treatment at the time of testing and three test were inconclusive. (Source: Montana Fair Housing)

Subsidized Housing Statistics

A telephone survey of all known subsidized housing providers in Great Falls was accomplished on January 9, 2013. Results are in Attachment A of this document.

Foreclosures, Building Permits and Blight

Foreclosures for 2012: approximately 94 foreclosures (Great Falls Association of Realtors / MLS) were sold in Great Falls down from 84 foreclosures in 2011. RDI-Consumer Credit Counseling stated that during 2012 they counseled 90 residential homeowners who were one to 12 months delinquent on their mortgage payments, compared to 52 residential homeowners in 2011. NeighborWorks stated they had 43 foreclosure packets that they helped individuals with guidance.

Residential building permits decreased in 2012 from 2011: January 1, 2012 through December 31, 2012 there were 46 residential permits valued at \$10,483,593 while during calendar year 2011 there were 52 residential permits valued at \$12,158,761. During 2012 there were 137 permits for residential repairs compared to 179 permits for residential repairs in 2011. There were 31 razing permits issued of which nine were single family residents in 2012 compared to 15 single family residents and one duplex razing permits for 2011. (Source Community Development Building Permit Summary Jan-Dec 2012 Year End)

To combat blight in low to moderate income neighborhoods CDBG monies were used for part of the salary for the City Code Enforcement Technician. For the year 2012 there were approximately 300 actions taken that resulted in two citations and the rest involved notices to owners for required clean up of rubbish, junk, abandoned vehicles, appliances, etc.

Strategies to Address Impediments to Fair Housing Choice

The impediments and strategies listed below were developed through a consensus effort during public listening meetings and e-mail review.

Impediments

Public:

1. HUD fair market rents are not competitive with local market rents (to low) resulting in opting out from HUD programs and fewer housing units for subsidized rents. **(Restricts housing choices or availability of housing choices)**

Private:

2. Discriminatory practices in violation of the Fair Housing Act are present in Great Falls. **(Restricts housing based on protected classes)**
3. Landlords, property managers, tenants, future tenants and support agencies lack knowledge on Federal Fair Housing Laws, State landlord tenant laws and discrimination laws. **(Counter productive to fair housing choice)**

4. Lack of quality housing for low income individuals including those using Housing Choice Vouchers. This results in a lack of housing and mobility for low income tenants. This impediment has been revised to be broader for 2012. **(Counter productive to fair housing choice)**
5. Lack of subsidized housing for elderly and disabled that is fully accessible / usable. **(Restricts housing based on protected classes)**
6. Lack of communications and education between organization that provide housing and agencies seeking housing for their cliental: safe housing for young parents, housing for veterans, foreclosure prevention, accessible housing. **(Restricts housing choices or availability of housing choices)**

Strategies and Measurements

Impediment 1 (Public Sector)

HUD fair market rents are not competitive with local market rents (to low) resulting in opting out from HUD programs and fewer housing units for subsidized rents.

(Restricts housing choices or availability of housing choices)

Strategy

Discuss this impediment during the annual HUD consultation and see what is being done, if anything.

Measurement

Will be monitored and compared with the next FY 1013 Fair Market Rent for all bedroom sizes.

Update: Upon receipt of the “Final FY 2013 Fair Market Rents” (FMR) it has been noted that the market rents have increased from 2012; efficiency units went from \$401 to \$496; one bedroom FMR increased from \$483 to \$517 in 2013; two bedroom rents have increased from \$619 in 2012 to \$663 in 2013; three bedroom units went from \$837 to \$959; and four bedroom units decreased from \$1,008 in 2012 to \$977 in 2013. This impediment continues as stated above. Even though there was an increase in fair market rents in all but four bedroom units this is still below rents being requested at this time.

Impediment 2 (Private Sector)

Discriminatory practices in violation of the Fair Housing Act are present in Great Falls. **(Restricts housing based on protected classes)**

Strategy

1. The City will market the availability of education and outreach pertaining to the rights of all protected classes. The City will be responsible for contacting various agencies to offer training on the rights and responsibilities of people in the housing market to include human services agencies.

2. A strategy will be developed to increase a community wide awareness of the existence of discrimination and resources available to those who have been discriminated against.

Measurement and Responsibility

The Fair Housing Specialist will update the Great Falls Housing Task Force committee on a monthly basis as to the number of discrimination complaints received, the number of individuals receiving training and organizations contacted, commencing April 2010.

Update: The Great Falls Housing Task Force has been and will continue to be briefed on monthly discrimination complaints received. During 2012 there were six (6) alleged discrimination complaints received by the fair housing specialist. See “Fair Housing Complaints” this document.

Impediment 3 (Private Sector)

Landlords, property managers, tenants, future tenants and support agencies lack knowledge on Federal Fair Housing Laws, State landlord tenant laws and discrimination laws. **(Counter productive to fair housing choice)**

Strategy

1. An ongoing assessment of specific education needs through current course evaluations and a survey process of housing stakeholders will be performed by the City Fair Housing Specialist.
2. Partner with local agencies to provide education and encouragement for successful landlords and tenants and others in the housing market.
3. The Fair Housing Specialist will update and develop training materials and partner with housing agencies (landlord organizations, financial institutions, and insurance and real estate organizations) to procure and author educational handouts within each area of expertise.

Measurement and Responsibility

The Fair Housing Specialist will provide a list of organizations contacted, number of individuals trained, and copies of educational material to the housing task force, for an annual review.

Update: On going. During calendar year 2012, 419 individuals received education in fair housing during 18 contact hours.

Impediment 4 (Private Sector)

There is a lack of quality housing for low income families and individuals and low income holding Housing Choice Vouchers, which results in a lack of housing and mobility for low income tenants. This impediment was revised to be broader for 2012 by adding "low income families "and will continue in 2013. **(Counter productive to fair housing choice)**

Strategy

1. Great Falls Planning / Community Development Department through its building inspectors, is establishing a more aggressive program to evaluate the habitability/quality of mobile homes, manufactured homes, rental properties (single and multi-family) especially for low income using Housing Choice Vouchers. This will include a tenant complaint system with involvement of the Cities Fair Housing Specialist.
2. Outreach and education will be provided by building officials to act in a proactive manner.
3. Community Development Block Grant (CDBG) funds will be used to improve housing stock and provide new housing for low income.

Measurement

Number of razing permits and permits for repairs issued by the City. Number of projects funded by Community Development Block Grant (CDBG) Funds and money expended.

Update: The City Building Official has ordered the repair or removal of uninhabitable trailers, which has been the focus of cleaning up blighted areas. There were 31 razing permits for 2012 which included: 9 single family razing permits: compared to 2011: 37 razing permits were issued that included 15 single family units and one duplex. Community Development Block Grant Funds were used to improve the quality housing through the following projects:\$64,872 to fund a rehabilitation specialist who provides rehab counseling, loan processing, inspections and construction monitoring for all CDBG funded City revolving loan housing programs for low income individuals; \$35,766 for a City Planning and Community Development Code Enforcement Technician; \$67,473 for the rental improvement loan program; Montana Home Ownership Network received \$25,000; \$60,289 to Neighborhood Housing services, Inc. for down payment assistance, purchase and rehabilitation of houses and revitalization activities in their Community Based Development Organization (CBDO)-designated neighborhoods. The City Building Official is insuring that HUD pamphlets "Seven Technical Requirements" and information on Section 504 are distributed to individuals that bring in plans for construction or rehab of multifamily structures.

Impediment 5 (Private Sector)

There is a lack of subsidized housing for elderly and disabled that is fully accessible / usable. **(Restricts housing based on protected classes)**

Strategy

Market need for fully accessible and usable housing and available programs that would help future rehabilitation of existing housing to become fully accessible / usable to households requiring special needs. Attract elderly / accessible housing providers to construct new units in the Great Falls community.

Measurement

Track increase in request for program information and annual survey of agencies that request accessible / usable living for their clients. This will include tracking the number of newly constructed accessible units for elderly and occupancy rates.

Update: In 2012 Benefis Health Care completed construction of Cascade Ridge, a low income housing tax credit project. This project has 20 two bedroom and 20 one bedroom apartments for elderly and accessible housing. All units are accessible and adaptable for its low income tenants. The Great Falls Housing Authority has completed two four-plex's that are accessible and two more four-plex's are under construction. These 16 units, when the last two four-plex's are complete will be affordable housing. See Attachment A, Sand Hills project.

Impediment 6 (Private Sector)

Lack of communications and education between organization that provide housing and agencies seeking housing for their cliental: safe housing for young parents, housing for veterans, foreclosure prevention, accessible housing.
(Restricts housing choices or availability of housing choices)

Strategy

Seek an agency or organization willing to coordinated and maintain a web site for organizations and housing providers to list available housing for the specific needs of individuals listed in this impediment or any special needs housing situation.

Measurement

Successful sponsorship and utilization of coordinator and web page.

Update: Housing agencies have been advised to list their rentals and tenants have been advised to search on MTHousingSearch.com for their housing needs. This existing web site fulfills the needs of the impediment if used properly. This web site is provided by the Montana Board of Housing and the Montana Department of Commerce Housing Division at no charge to the agency or tenant.

Malmstrom Air Force Base uses the Automated Housing Referral Network (AHRN.com) to advertise for military personnel.

Attachment A:

Great Falls Subsidized Housing Statistics as of January 2013

Attachment A: Subsidized Housing statistics as of January 9, 2013. The survey includes public housing and affordable housing operated by the Great Falls Housing Authority. Other properties are privately owned subsidized housing where the government provides subsidies directly to the owner who then applies the subsidies to the rent charged to low income tenants. This does not apply to affordable housing. Accessibility is based on units available for individuals who are mobility impaired. Various agencies have asked for an inventory of roll in showers. This survey did not focus on other supportive services.

Subsidized Housing Statistics as of January 9, 2013

<u>Name</u>	<u>#Units (Occupied)</u>	<u>Occupancy Rate</u>	<u>Accessible Units / #filled by Mobility Impaired</u>			
Autumn Run** (***)	120		52	/		
Cascade Ridge**	40 (40)	100%	40	/		*4
Mountain View**	48 (46)	95%	16	/	4	
Town site Apts. **	20 (16)	80%	10	/	0	
Sand Hills **	8(8)	100%	8	/	1	
Holland Court **	16 (15)	93%	8	/	4	
Yeoman	30 (30)	100%	2	/	1	
Russell	20 (20)	100%	0	/	0	
Sunrise	50 (49)	98%	3	/	3	
Austin Hall	34 (34)	100%	5	/	5	*5
Area 22 (GFPHA)	200 (186)	98%	14	/	14	*14
Area 25 (GFPHA)	142 (136)(14 rehab)	95%	0	/	0	
Vista Villa	96 (94)	98%	0	/	0	
Elmore Roberts	60 (55)	91%	3	/	0	*1
Park Manor	103 (98)	95%	0	/	0	
Aspen Village	60 (57)	95%	8	/	2	*1
Elmwood	18 (18)	100%	2	/	1	
Parkview	83 (83)	100%	0	/	0	
Southwinds	23 (23)	100%	23	/	23	*23
Portage	47(46)	98%	47	/	8	*47
Meadow Lark	17 (17)	100%	17	/	17	*17
Broadview Manor	20(20)	100%	1	/	1	
Centennial Village	48(48)	100%	0	/	0	
Rainbow House	40(40)	100%	0	/	0	
Sunshine Village	72(65)	90%	7	/	7	*6
Franklin School Apt.	40(33)	82%	6	/	0	
TOTALS:	1335(1277) (14 in rehab)	96%	272		91	*118

*Denotes units with roll in showers. (Note: Rehab units were subtracted from totals to use only livable units in calculations.)

** Affordable Housing

*** Manager stated that "it was company policy not to give out occupancy rates" hence add 120 units to total units available (1455 units).

Section Eight Housing Choice Vouchers as of January 9, 2013: Housing Choice Vouchers are managed by Opportunities, Inc. and the Great Falls Housing Authority. Project Based (Mod Rehab) are managed by Opportunities, Inc.. Opportunities, Inc. is funded through the Montana Department of Commerce who in turn contracts with the Department of Housing and Urban Development. The Great Falls Housing Authority is funded directly with Department of Housing and Urban Development.

	<u>Number Vouchers Contracted</u>	<u>Number Vouchers in Use</u>	<u>Percentage in Use</u>
Opportunities, Inc.	475	448	94%
Great Falls Housing Authority	265	204	76%
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TOTALS:	740	652	88%

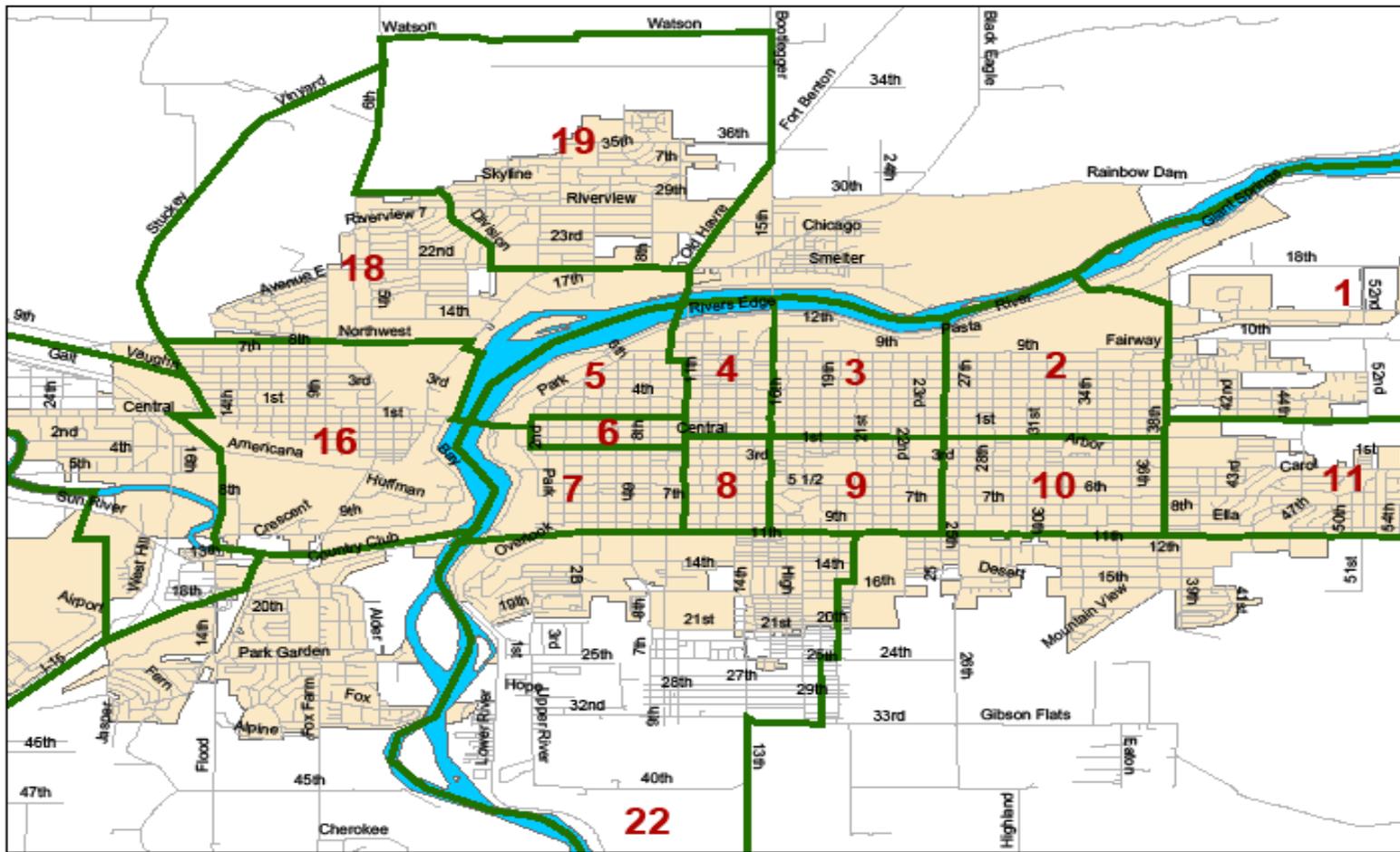
Housing Choice Voucher waiting list as of January 10, 2013: Opportunities, Inc. 1281; Great Falls Housing Authority 100.

Project Based (Mod Rehab) as of January 9, 2013: This program is managed by Opportunities, Inc.

<u>#Units (Occupied)</u>	<u>Occupancy Rate</u>
141(141)	100%

Attachment B

Great Falls Census Tracts



 Census Tracts

March 2005

Great Falls, MT
2000 Census Tracts

