

## **CR-05 - Goals and Outcomes**

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

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

The time period covered in the CAPER is July 1, 2018, through June 30, 2019. In this reporting period the City of Great Falls received a total of \$1,064,452 in federal funds to achieve the goals of the Consolidated Plan. The scope of the CAPER includes a wide range of activities undertaken in the past year using CDBG, HOME and NSP grant funds to address the identified priorities. In addition to the City using Department of Housing and Urban Development (HUD) funding to provide low income people with a wide variety of services, it should be noted housing providers, non-profit human service organizations, private entities and other government agencies within the community used many other funding sources beyond those provided by HUD to assist low income and homeless people. Major elements of the report include accomplishments and activities undertaken in the following areas:

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

The CAPER is made available to the public for a 15-day comment period to solicit comments from the public on activities undertaken and performance of the program.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Economic Development	Non-Housing Community Development Economic Development	CDBG: \$	Jobs created/retained	Jobs	15	73	486.67%	0	48	
Economic Development	Non-Housing Community Development Economic Development	CDBG: \$	Businesses assisted	Businesses Assisted	10	7	70.00%	0	3	
Fair Housing	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	8	11	137.50%	0	0	
Fair Housing	Affordable Housing	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	200	511	255.50%	0	0	
Homeownership	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	50	14	28.00%	5	0	0.00%
Homeownership	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	75	25	33.33%	5	0	0.00%

Homeownership	Affordable Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	25	69	276.00%	0	6	
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	0	0		5	0	0.00%
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	75	76	101.33%	5	2	40.00%
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	28		10	3	30.00%
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	700	375	53.57%	0	0	

Public Improvements	Public Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500	44528	2,968.53%	4624	14641	316.63%
Public Improvements	Public Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	100	53	53.00%	0	0	
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15000	23214	154.76%	0	0	

Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	6580		491	215	43.79%
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Transitional Housing	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5200	205	3.94%	0	64	

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

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

The City Commission prioritized 40% of the CDBG funds for public facility improvements and handicap accessibility, 35% for affordable housing, 5% for public services, and 20% for administration. Less than 20% was actually used for administration during the program year.

These percentages were used as guidelines in accepting grant proposal applications and in determining maximum funding levels for each category. Depending on the type of project applications that were funded and how the eligibility of the activities were categorized, a discrepancy

can be created between the original percentage guidelines and the actual expenditures. In addition, actual expenditures include activities which were funded after the application period and activities funded in previous years that were completed during this reporting period and are not included as part of the percentages in the initial prioritization of funds. A detailed description of specific activities, accomplishments, funds authorized and funds disbursed for each of these priorities is provided as an appendix.

## CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME
White	92	6
Black or African American	0	0
Asian	1	0
American Indian or American Native	1	0
Native Hawaiian or Other Pacific Islander	0	0
<b>Total</b>	<b>94</b>	<b>6</b>
Hispanic	2	0
Not Hispanic	92	6

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

### Narrative

The City is focused on assisting low to moderate income families that live within the city limits. Great Falls does not currently have a great deal of ethnic diversity. The largest percentage racial category in Great Falls is Caucasian followed by Native Americans. The City provides funding for activities that do not discriminate against any ethnic or racial group.

Formally three census tracts (4, 8 and 16) were designated as slum and blight areas and three Census tracts (5, 6 and 7) were included in a HUD-approved Urban Renewal Area. Both area designations expired in May 2012. Because of the large cuts in CDBG funding the past few years, the City decided it is unable to make the significant commitment to eliminating slum and blight conditions that would be required if it were to renew its slum and blight area designations.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,527,123	650,886
HOME	public - federal	917,488	20,776
General Fund	public - local	0	0

**Table 3 - Resources Made Available**

### Narrative

For Fiscal Year 2018/2019, the City received a total of \$1,064,452 in federal funds to achieve the goals of the Consolidated Plan. These goals are to provide decent housing, create a suitable living environment and expand economic opportunities for the citizens of Great Falls. Activities which were undertaken to achieve these goals included property acquisition, housing rehabilitation, homebuyer assistance and other endeavors designed to improve the quality of housing for people with low to moderate incomes. Activities were also undertaken to improve public facilities and to provide public services. The City pursued almost all resources it indicated it would pursue in the 2018/2019 Annual Action Plan to undertake these goals.

### Identify the geographic distribution and location of investments

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

**Table 4 – Identify the geographic distribution and location of investments**

### Narrative

All activities funded by the City are required to take place within the city limits. Most of the activities funded are located in LMI census tracts showing 51% or more LMI populations. Some of the activities that the City undertakes are income-based and can take place outside the LMI census tracts; however, the recipient must qualify as low to moderate income or fall within the Limited Clientele benefit.

## Leveraging

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

Leveraging by sub-recipients is encouraged by the City and is a contributing factor in the awarding of CDBG and HOME funds. The amount that a sub-recipient is able to leverage other than federal funds will determine how favorable the application for funding was received by the City's Grant Evaluation Committee. The Committee reviewed all applications for CDBG and HOME funding. Some sub-recipients were able to provide matching funds in addition to CDBG funds that were awarded. The matching funds consisted of state, local, and private funds as well as other federal funds that were allowed to be used for match.

City staff is not aware of any publically-owned land that was utilized to address needs identified in the Consolidated Plan this fiscal year.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	3,510,707
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	3,510,707
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	3,510,707

**Table 5 – Fiscal Year Summary - HOME Match Report**

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

**HOME MBE/WBE report**

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	78,096	0	0	78,096

Table 7 – Program Income

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

**Table 8 - Minority Business and Women Business Enterprises**

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

**Table 9 – Minority Owners of Rental Property**

**Relocation and Real Property Acquisition** – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired		0	0			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – Relocation and Real Property Acquisition**

## CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	33
Number of Non-Homeless households to be provided affordable housing units	30	6
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>30</b>	<b>39</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	15	0
Number of households supported through Rehab of Existing Units	15	5
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>30</b>	<b>5</b>

Table 12 – Number of Households Supported

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

The City of Great Falls continued to assist with the facilitation of the Great Falls Continuum of Care (CoC) Coordinated Entry System. The City's involvement with facilitating the Case Conferencing Bi-Weekly meetings lead to adding resources to house 33 homeless individuals.

Through the use of CDBG and HOME funds the City was able to assist in Down Payment Assistance to 6 low income individuals and provide assistance towards rehabilitation of 5 existing housing units that

were occupied by low to moderate income households. The City was unable to implement the planned amount of new affordable housing construction projects due to a compliance problem with the City’s HOME program. The City has resolved the compliance issue and is once again issuing HOME program grants for new affordable housing construction. It should also be noted that NeighborWorks Great Falls is nearing completion of constructing its Rockcress Commons project. This project is being facilitated by the use of State of Montana Low Income Housing Tax Credits and will provide an influx of 124 new affordable rental housing units for Great Falls.

The City hopes to increase the number of new construction and rehabilitated homes in the future; however, this is limited by two factors. The first factor is the amount of funding available to undertake these activities. Construction cost continues to increase on a yearly bases, while the amount of funds continues to decrease. The second factor is the amount of infill properties that are available for new construction within the city limits. Rehabilitation is a more viable option; however, the housing market is in high demand, so being able to purchase units at an affordable price is always a challenge. With this noted, the City will be receiving a large increase in new affordable housing construction as a result of the following projects: 1) Rockcress Commons, 2) Meriweather Crossing (80 new, affordable single family homes that will be built and annexed into the City in 10 home phases), and 3) affordable infill homes in the Kranz subdivision.

**Discuss how these outcomes will impact future annual action plans.**

The amount of funding prioritized for these types of activities is based on responses from the Great Falls Community through the data collected during the Annual Community Needs Assessment. Future Annual Action plans will incorporate the Community Data and the goals initially set forth in the Consolidated Plan.

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

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	1	0
Low-income	0	1
Moderate-income	4	5
<b>Total</b>	<b>5</b>	<b>6</b>

**Table 13 – Number of Households Served**

**Narrative Information**

One of the main affordable housing programs that the City administers is the CDBG-funded housing rehabilitation program to assist LMI renters and homeowners with housing rehabilitation activities. This program includes the 1) Deferred Payment Loan Program: no-interest deferred loans to low income

homeowners to make code-related repairs to owner-occupied, single family homes; 2) Rental Improvement Loan Program: no-interest loans to property owners for code-related repairs to rental units which remain affordable to low income households; and 3) Water & Sewer Loan Program: no/low-interest loans to low income homeowners and property owners who provide rental units which remain affordable to low income households to construct or replace water and sewer lines.

All of the City's beneficiaries served this fiscal year had household incomes less than 80% of the Area Median Income (AMI) level. All of the City's affordable housing beneficiaries were homeowners or were assisted in achieving homeownership.

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

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

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

The City works with a number of non-profit organizations that work directly with the homeless within our community. Notifications for public hearings and other requests for community involvement are forwarded to these non-profits that interact with the homeless on a day-to-day basis. The City also assists the local Continuum of Care with facilitating Case Conferencing meetings for the Coordinated Entry System, administrative support, and financial assistance.

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

The City has made a push this year and into the future to encourage applications for CDBG funds from organizations that address emergency shelters and transitional housing facilities. During the fiscal year funding was made available to a local non-profit to assist them in providing transitional housing to homeless veterans within our community. In the future the City hopes to continue to provide funding to new and existing non-profits to provide more opportunities for housing to the homeless. The Great Falls Rescue Mission is a wonderful partner and the only emergency shelter within the city limits. To date, the City has been unable to convince the Mission to apply for federal assistance.

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

The City of Great Falls provides support and financial assistance to encourage preventative efforts and services to address homelessness in Great Falls. Supportive services for the homeless include assistance with case management, adult therapeutic aide services, emergency housing, food, clothing, household items and emergency medication funds. Opportunities, Inc., is a primary partner that provides rental assistance to help individuals avoid homelessness on a temporary basis. The Center for Mental Health (CMH) employs full-time case managers who dedicate their time to outreach services (including wellness checks) to the chronically homeless population. Rural Dynamics provides credit counseling for individuals so that they are better able to manage expenses and avoid becoming homeless due to poor money management. Great Falls Children's Receiving Home provides emergency foster care, shelter care and supportive services for children who were removed from their homes because of abuse,

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

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

The City partners with multiple agencies through our involvement with the Continuum of Care to assist homeless persons in their transition to permanent housing. The collaboration ensures that the City can assist wherever needed and be aware of the current resources available. The agencies below are involved in the Continuum of Care:

The Rescue Mission experienced very high service levels at its women and family shelter throughout the year. The agency began a long-term capital campaign to construct a facility to be used for additional emergency and transitional housing for women, children and families. The campaign was a success and the building opened in late 2016.

Family Promise of Great Falls is another non-profit that provides temporary housing to homeless families. The organization works with religious organizations within the city to temporarily house homeless families in the churches for a week at a time. The families are moved from church to church until the families can find a long-term housing solution.

St. Vincent de Paul is a non-profit that provides transitional housing and case management through their Grace Home Veterans Home. They also provide food and emergency supplies through their homeless outreach program.

Opportunities, Inc., provides transitional support through case management, referral services, food

vouchers, and hotel vouchers. They are able to provide additional case support for all shelters in Great Falls.

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

### **Actions taken to address the needs of public housing**

The Housing Authority continued its ongoing program for the rehabilitation of public housing. During the past year the agency progressed in its multi-year rehabilitation project at the main site (MT2-1 and MT2-2) which involves upgrading the overhead electrical distribution system, street lights, sewer mains, water mains and gas distribution systems for 490 units and major interior renovation of 156 units. In the past year, infrastructural modernization and updates were completed within MT2-1. Additionally, the interiors of 12 units were demolished to the studs. Renovations on these units continued within the last year and expanded to include an additional 4-plex. The plans and scope of work were completed for site electrical and lighting upgrades within MT2-2, where remodeling is expected to continue in phases.

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

Resident input was sought through public meetings, particularly as related to the annual plan and renovation projects. All residents were notified of public meeting dates and agendas through a quarterly newsletter. Two resident tenants served on the Housing Authority Board of Commissioners during the past year. The Housing Authority works with both NeighborWorks Great Falls and Habitat for Humanity to encourage current tenants to become homeowners through these programs.

### **Actions taken to provide assistance to troubled PHAs**

The Great Falls Housing Authority is not a designated troubled agency. The projects noted in the narrative above indicate a strong commitment to assist the Housing Authority.

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

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

The City's Fair Housing Specialist reviewed city ordinances to ensure compliance with fair housing laws. The City's Fair Housing Specialist monitored whether the City has local policies, practices or regulations having a disparate impact on any protected classes and was not aware of any actions that would reflect a disparate treatment in housing. The City's Land Development code defines "Family" and restricts the number of non-related individuals who can live in a dwelling unit to five (5) adults. As it does with all of the City's zoning regulations, the City of Great Falls enforces over-occupancy of dwelling units through citizen-driven complaints.

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

The CDBG program funded activities through agencies which assisted in meeting the needs of underserved people, such as \$36,845 to St Vincent de Paul for the roof replacement of their Grace Home, a transitional housing facility for veterans experiencing homelessness. As described elsewhere in this report, many non-profit social service organizations and governmental agencies met the needs of individuals who are handicapped and/or underserved in the community.

Numerous governmental departments provided services to the underserved. For example, the City-County Health Department (CCHD) provided health care services to low income people. Services included disease prevention and control, nutrition education, food supplements, primary health care, dental care, sexually transmitted disease treatment and education, mental health counseling, case management, assistance with obtaining prescriptions and specialty medical care and parenting instruction.

Indian Family Health Clinic (IFHC) provided clinical services to primarily urban American Indians with extremely low to low income; however, the clinic was open to all. Services included primary medical care, diabetes clinical services, prescription medication, behavioral health programs (including chemical dependency, IV/Hepatitis C prevention), wellness services, limited community resource advocacy and limited mental health counseling.

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

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

paint if any of the houses were built prior to 1978. The City monitored to assure lead-based paint hazard regulations were followed on all CDBG housing rehabilitation projects.

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

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

The City supports local agencies with administrative assistance and financial support to reduce poverty, including the Great Falls Development Authority, which assisted 3 business to create new jobs for persons from LMI households during this program year. They also utilized funds to implement a household labor survey and analysis that provided data for new economic development initiatives to create jobs for low and moderate income residents.

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

A variety of means were used in the past year to improve the degree and efficiency of interactions between governmental and private operations.

The nine Neighborhood Councils met regularly and provided a source of educational outreach for Citystaff to promote and seek input on CDBG and HOME program priorities. Additionally, the City's involvement with the Continuum of Care, NeighborWorks Great Falls, and United Way organizations and other community groups create a method to both disseminate and obtain information on issues of importance to citizens.

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

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

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

The City continued its close working relationship with the Housing Authority. This relationship included sharing of staff, review of loan requests, environmental clearances and fair housing activities. The City Commission appoints the Housing Authority's Board of Commissioners and the City Manager appoints

the Executive Director of the Housing Authority. Housing Authority staff members are City employees. The Housing Authority Board acts as a loan committee and reviews loan requests for the City's CDBG-funded housing rehabilitation programs. All Housing Authority sponsored construction and rehabilitation projects were environmentally cleared by the City before any costs were incurred. Therefore, the City was aware of and reviewed any proposed development or demolition of public housing sites.

The City coordinated with the city and state historic preservation officers to evaluate properties for historical significance as part of the environmental review process related to the use of federal funds.

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

The City of Great Falls continues to make diligent efforts to overcome impediments identified in the analysis of impediments to fair housing choice. The City has used CDBG funds to partially fund a Fair Housing Specialist position shared with the Great Falls Housing Authority.

The Fair Housing Specialist took on initiatives to educate the public on their housing rights as well as provide informational resources when needed. Outreach through education and networking was the principal method of furthering fair housing. Activities the City's Fair Housing Specialist undertook included: maintained current fair housing news on the Housing Authority and City websites; distributed free pamphlets with information about fair housing community-wide; presented fair housing educational/outreach programs at the NeighborWorks Great Falls Homebuyer Education Course and Young Parents Education Center; provided facilitation to prevent evictions; and assisted tenants and landlords with landlord-tenant issues.

The impediments that have been identified in past CAPERs are impediments #4 and #5, which discuss quality rental housing for low income, elderly, and disabled individuals. The City has continued efforts on this front through CDBG funding streams, not only to employ a fair housing specialist, but to also assist in creating additional rental housing in the Great Falls market, decrease the slum and blight all over the city, and raise the quality of rental properties. Additionally, the City began implementing its newly developed Tenant and Homeowner Housing Complaint Form, which allows community members to file formal, written complaints with the City so that housing concerns can be addressed accordingly.

The partnership between the City and the Housing Authority continued through the joint position of the City's Fair Housing Specialist. Fair housing activities included: a) investigating tenant complaints and referring them to the Montana Fair Housing and Montana Human Rights Bureau when appropriate, b) providing facilitation services, c) investigating tenants' complaints related to fair housing and Housing Authority policies, and d) reviewing Housing Authority procedures that pertain to federal and state landlord and tenant law for public housing.

The City continues to use community surveying as a means to outline and address what the population

deems to be fair housing issues. This includes the community needs assessment survey that was utilized to gather feedback from citizens on how CDBG and HOME funds should be allocated, as well as the City's participation in the state-wide Fair Housing Survey, further expanding the efforts of the City as it moves forward with the next Analysis of Impediments for 2020-2025.

## **CR-40 - Monitoring 91.220 and 91.230**

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

Overall monitoring includes the following for CDBG and HOME programs:

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

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

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

CDBG Projects are monitored via desk review and/or site-visits, including inspections, every year. HOME Projects are monitored on a schedule as required by Federal regulations based on the period of affordability. On-site visits include an assessment of property standards completion and ongoing compliance inspections, tenant file review, household income verification, etc. City staff also conducts desk reviews to ensure that leases are in compliance with HOME regulations; rents are compliant with HOME limits; tenant incomes are reviewed annually and they are within eligibility limits; the property owner/manager is inspecting the property at least annually; that adequate project reserves have been established and annual reports are received. Affordable housing projects are also scrutinized via routine Risk Assessment in order for City staff to evaluate the relative level of risk of noncompliance for each project in the assisted portfolio. The factors taken into consideration are the number of units; staff turnover and experience; funding amounts, affordability periods and type of assistance provided; file and project documentation; and past performance. Projects with higher risk assessment scores are prioritized for intensive case management efforts to bring the project into compliance. These projects typically undergo multiple site visits and extensive technical assistance from City staff.

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

of housing units using federal funds.

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

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

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

Per the City of Great Falls Citizen Participation Plan a proposed copy of the Consolidated Annual Performance and Evaluation Report is made available to the public on the City's website, at the public library, and at the Planning & Community Development office for a 15-day comment period. Notice of availability of the report is accomplished through two legal ads spaced seven days apart in the Great Falls Tribune. Notification is also posted on the City's website, and emails are sent to individuals on the CDBG distribution list. Agencies that work with individuals at higher risk, such as minorities, non-English speaking persons, and persons with disabilities, are contacted through the CDBG distribution list to ensure all citizens had reasonable notice and an opportunity to comment on performance reports. All published notices have information available for individuals that are speech or hearing impaired. All comments received regarding the CAPER will be considered and a summary of all comments will be included in the final copy of the CAPER to be posted to the City website on an ongoing basis.

## **CR-45 - CDBG 91.520(c)**

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

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

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

During the previous fiscal year (2017/2018), the City changed the program objectives due to an issue with the grant process. This resulted in a change from allocating funding based on project proposals submitted to a Community Development Council to facilitating an Annual Community Needs Assessment to develop broad community-based funding categories. This updated process allows for increased community involvement and a more streamlined process, which ultimately gives subrecipients the ability to apply for funding year-round. Implementation of this updated grant process continued during this fiscal year. Staff will continue to evaluate procedures to ensure a streamlined and strategic approach to addressing the goals in the Consolidated Plan. Based on input received from NeighborWorks and the City Commission, a focus group session will be added to gain additional insights on possible funding priorities.

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

No

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

## **CR-50 - HOME 91.520(d)**

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

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

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

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

On-site inspection and program monitoring is conducted based on Federal regulations. The City conducted 3 HOME on-site monitoring visits and file reviews in October 2018 for Meadowlark Apartments, The Portage Apartments, and Sand Hills. While these 3 projects were on the schedule to be inspected for FY17, there was a delay due to staffing availability. In February 2019, on-site monitoring and a file review was conducted for the 6 HOME units at First Avenue Estates, an affordable multi-family rental project completed in 2017 by NeighborWorks Great Falls.

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

As part of the agreement with the City, each sub-recipient receiving HOME funds through the City for housing projects containing five or more units was required to affirmatively market these units. The City found the programs using HOME funds during this reporting period to be using every available option to market affordable housing units. The City will provide guidance to future grant sub-recipients to continue successful marketing of the housing units.

The City monitored all NeighborWorks (NHS) activity conducted with HOME funds by requiring NHS to submit quarterly reports on all activities. The City has also recently updated the approval process for NHS grant activities to create a transparent process. NHS marketed their Down Payment Assistance Program and new construction projects to realtors and bankers throughout the city. Bankers and realtors made referrals to the Down Payment Assistance Program and the homebuyers clubs offered by NHS. All graduates of the homebuyers clubs having low to moderate incomes were eligible to apply to

purchase the newly constructed or rehabilitated homes and a letter notifying of the purchase application time frame and procedure was mailed to all eligible graduates. In addition, information on all NHS services was included in their newsletters and on their website.

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

HOME program income generated by sub-recipients is allowed to remain in their revolving loan account. The funds are to be used for eligible activities as outlined in the written agreement with the City. HOME program income was generated by only one sub-receptient this fiscal year. NeighborWorks Great Falls is currently the only sub-receptient with HOME funds that generated program income. NeighborWorks Great Falls solely used HOME Program Income as down payment assistance for purchase of homes to low to moderate income individuals. A total of 6 loans were processed during the program year.

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

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