

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, 2017, through June 30, 2018. In this reporting period the City of Great Falls received a total of \$893,809 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; Steps taken 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; Additional funding resources.

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 | 25 | 166.67% | 4 | 4 | 100.00% |
| Economic Development | Non-Housing Community Development Economic Development | CDBG: \$ | Businesses assisted | Businesses Assisted | 10 | 4 | 40.00% | | | |
| Fair Housing | Affordable Housing | CDBG: \$ | Rental units constructed | Household Housing Unit | 8 | 11 | 137.50% | | | |
| Fair Housing | Affordable Housing | CDBG: \$ | Housing Code Enforcement/Foreclosed Property Care | Household Housing Unit | 200 | 511 | 255.50% | | | |
| Homeownership | Affordable Housing | CDBG: \$ / HOME: \$ | Homeowner Housing Added | Household Housing Unit | 50 | 14 | 28.00% | 4 | 0 | 0.00% |
| Homeownership | Affordable Housing | CDBG: \$ / HOME: \$ | Homeowner Housing Rehabilitated | Household Housing Unit | 75 | 25 | 33.33% | | | |

| | | | | | | | | | | |
|------------------------|--------------------|------------------------------|---|------------------------|-----|-----|---------|---|----|---------|
| Homeownership | Affordable Housing | CDBG: \$ / HOME: \$ | Direct Financial Assistance to Homebuyers | Households Assisted | 25 | 63 | 252.00% | | | |
| Housing Rehabilitation | Affordable Housing | CDBG: \$ / HOME: \$ | Rental units rehabilitated | Household Housing Unit | 75 | 74 | 98.67% | 0 | 74 | |
| Housing Rehabilitation | Affordable Housing | CDBG: \$ / HOME: \$ | Homeowner Housing Rehabilitated | Household Housing Unit | 0 | 25 | | 7 | 8 | 114.29% |
| 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% | | | |

| | | | | | | | | | | |
|---------------------|---|-------------|---|---------------------|-------|-------|-----------|------|------|---------|
| 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 | 29887 | 1,992.47% | 4624 | 8710 | 188.37% |
| 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% | | | |
| 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% | | | |

| | | | | | | | | | | |
|----------------------|--|----------|--|------------------------|------|------|-------|-----|-----|---------|
| Public Services | Non-Homeless Special Needs Non-Housing Community Development | CDBG: \$ | Public service activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 0 | 6365 | | 491 | 556 | 113.24% |
| Transitional Housing | Homeless Non-Homeless Special Needs | CDBG: \$ | Public service activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 5200 | 141 | 2.71% | | | |
| Transitional Housing | Homeless Non-Homeless Special Needs | CDBG: \$ | Housing for Homeless added | Household Housing Unit | 0 | 0 | | 10 | 0 | 0.00% |

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

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

The City Commission prioritized 30% of the CDBG funds for public facility improvements and handicap accessibility, 30% for affordable housing, 12.5% for public services, 7.5% for economic development 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 | 431 | 31 |
| Black or African American | 10 | 0 |
| Asian | 2 | 0 |
| American Indian or American Native | 54 | 6 |
| Native Hawaiian or Other Pacific Islander | 0 | 1 |
| Total | 497 | 38 |
| Hispanic | 6 | 0 |
| Not Hispanic | 491 | 38 |

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 of race 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 | CDBG | 1,225,249 | 597,454 |
| HOME | HOME | 513,226 | 0 |
| HOPWA | HOPWA | 0 | 0 |
| ESG | ESG | 0 | 0 |
| General Fund | General Fund | 0 | 0 |
| Other | Other | 0 | 0 |

Table 3 - Resources Made Available

Narrative

For Fiscal Year 2017/2018, the City received a total of \$893,809 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 economic development, 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 2017/2018 Annual Action Plan to undertake these goals. No HOME funding was expended in Fiscal Year 2017/2018.

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-recipient 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 Community Development Council. The Council reviewed all applications for CDBG funding. Some, but not all sub-recipients were able to provide match funds in addition to CDBG funds that were awarded. The match 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.

| Fiscal Year Summary – HOME Match | |
|--|-----------|
| 1. Excess match from prior Federal fiscal year | 3,557,045 |
| 2. Match contributed during current Federal fiscal year | 0 |
| 3. Total match available for current Federal fiscal year (Line 1 plus Line 2) | 3,557,045 |
| 4. Match liability for current Federal fiscal year | 46,337 |
| 5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4) | 3,510,708 |

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 begin-ning 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 \$ |
| 273,287 | 0 | 0 | 0 | 273,287 |

Table 7 – Program Income

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

Table 8 - Minority Business and Women Business Enterprises

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

Table 9 – Minority Owners of Rental Property

| Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition | | | | | | |
|--|-------|-----------------------------------|---------------------------|--------------------|----------|--------------------|
| 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 | 10 | 58 |
| Number of Non-Homeless households to be provided affordable housing units | 80 | 0 |
| Number of Special-Needs households to be provided affordable housing units | 0 | 0 |
| Total | 90 | 58 |

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 | 4 | 0 |
| Number of households supported through Rehab of Existing Units | 15 | 56 |
| Number of households supported through Acquisition of Existing Units | 0 | 0 |
| Total | 19 | 56 |

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 was able to assist with the new facilitation of the Great Falls Continuum of Care (CoC) Coordinated Entry System. The City's involvement with facilitating the Case Conferencing Bi-Weekly meetings and purchasing the software of the Coordinated Entry System lead to adding resources to house 58 homeless individuals.

Through the use of CDBG and HOME funds the City was able to assist in Down Payment Assistance to low income individuals and provide assistance towards rehabilitation of existing housing units that were occupied by low to moderate income households. The City was unable to implement the planned amount of new construction projects due to a problem with our grant process, we have updated our grant process, therefore moving forward we are able to proceed with the planned goals.

In the long run the City hopes to increase the number of new construction and rehabilitated homes in the future, however the 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 and 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 with the housing market is in high demand so being able to purchase units at an affordable price is always a challenge.

Discuss how these outcomes will impact future annual action plans.

The amount of funding prioritized to these types of activities is based on 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.

| Number of Households Served | CDBG Actual | HOME Actual |
|-----------------------------|-------------|-------------|
| Extremely Low-income | 53 | 0 |
| Low-income | 21 | 0 |
| Moderate-income | 0 | 0 |
| Total | 74 | 0 |

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 programs to assist LMI renters and homeowners with housing rehabilitation activities: Deferred Payment Loan Program: no-interest deferred loans to low income homeowners to make code-related repairs to owner-occupied, single family homes; Rental Improvement Loan Program: no-interest loans to property owners for code-related repairs to rental units which remain affordable to low income households; 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 bases. 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 organization that address emergency shelters and transitional housing facility. During the fiscal year funding was made available to a local non-profit to assist them in providing transitional housing to homeless families 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. Unfortunately 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 provided to address homelessness in Great Falls. Supportive services for the homeless included; assistance with case management, adult therapeutic aide services, emergency housing, food, clothing, household items and emergency medication funds. Opportunities Inc is a major partner that provides rental assistance to help individuals avoid homelessness on a temporary basis. The Center for Mental Health (CMH) had a full-time case manager who dedicated 40% of her time to outreach services (including wellness checks) to the chronically homeless population. Center for Mental Health, who

received \$10,000/CDBG in FY17 from the City, provide services for the mentally ill homeless and housing through multiple group homes. Rural Dynamics provides credit counseling for individual so that they are better able to manage expenses and avoid becoming homeless due to poor money management. Great Falls Children's Receiving Home provided 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 the past year 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 provided transitional housing, case management, life skills training and cultural activities for males transitioning out of chemical dependency treatment. Young Parents Education Center (YPEC) provided support services for young parents through coordinating with the school districts homeless coordinator and providing a seminar setting for the fair housing specialist to discuss housing topics with their students. Chronically homeless people under the age of 18 years were provided with child care, help competing applications for emergency assistance and referral services. In addition, YPEC used \$10,000 in 2017/2018 CDBG funds to provide day care scholarships and emergency housing scholarships for low income teen and young adult parents.

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 agency's, through the Continuum of Care, to assist homeless persons make the transition to permanent housing. The collaboration ensures that the City can assist wherever needed and be aware of the current resources available. The below agencies 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 with 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, 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 the interior of 12 units were demolished to the studs and were in the process of being rebuilt/rehabilitated. Concerning MT2-1, 95% of infrastructure rehabilitation is complete, while sewer mains and electrical distribution have been fully completed. Remodeling of MT2-2 continues, and the quantity of units to be rehabilitated depends upon source of funding as emphasis has been given for the design and implementation of infrastructure upgrades.

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 City provided \$40,000 in funds to the Housing Authority in fiscal year 2017/2018 to assist in replacing the two boilers for Austin Hall, new security entry door system and purchase 40 furnaces for Parkdale Amp 1 and Amp 2.

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 fair housing specialist reviewed city ordinances to ensure compliance with fair housing laws. The City 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 \$25,000 to Area VIII Agency on Aging to purchase food for Meals on Wheels, a citywide home delivery meal program for low/moderate income elderly who are handicapped or unable to prepare meals. 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 clinic, 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 agency's with administrative assistance and financial support to reduce poverty. The below projects were funded with CDBG funds to reduce the number of poverty-level families

Young Parents Education Center provided on-site developmental day care, family support and outreach, pre-vocational activities and parenting/child development education to assist pregnant and parenting teens and young adults to build self-sufficiency.

Great Falls Development Authority assisted 2 business to create new jobs for persons from LMI households. They also utilized funds to implement a household labor survey and analysis that will provide 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 the City government, organizations and other community groups as 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, Revolving Loan Fund Administrators (NeighborWorks Great Falls), 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 has taken a multitude of different directions 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 specialist took on initiatives to educate the public on their housing rights as well as provide informational resources when needed. The last two years the City utilized data collection to target populations to make more information available to them on housing and housing choice. Outreach through education and networking was the principal method of furthering fair housing. Activities the City 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 Local Individuals Network for Customized Services; and provided facilitation to prevent evictions; assisted tenants and landlords with landlord-tenant issues.

The impediments that have been previously identified in the past CAPER were impediments #4 and #5. The impediments discussed the quality of rental housing for low income, elderly, and disabled

individuals needed attention. The City has continued efforts on this front through their CDBG funding streams not only to employ a fair housing specialist, but to also assist in adding additional rental housing to the Great Falls market. Funds were also used to partially fund the position of Code Enforcement Technician and from July 1, 2016 to June 30, 2018. That individual opened 332 cases and was able to close 280 of them. This was an effort to decrease the slum and blight all over the city which would also raise the quality of rental properties. This has been coupled with a Tenant and Homeowner complaint system that involves formal written complaints filled out with the city so issues can be addressed.

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 to 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 also used and is currently using surveying to stay on top of different areas that the population sees as issues with fair housing. The previous survey was to see what the community of Great Falls wants to use the CDBG funding on. The survey currently being implemented is to gather data for furthering the efforts of the City as it moves forward with the next AI 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 scheduled as required by Federal regulations based on the period of affordability. On-site visits include property standards completion and ongoing compliance inspections, tenant file review, household income verification, etc. City staff also conducts desk reviews to ensure 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 CHDOs apply for recertification on an annual basis to ensure continued requirements are being met for 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 display ads spaced six days apart in the Great Falls Tribune, notification is posted on the City's website, and emails are sent to individuals on the CDBG distribution list. 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; Steps taken 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; Additional funding resources.

This fiscal year, the City changed the program objectives due to an issue with the grant process. In result, the City changed the process in allocating funding from utilizing a Community Development Council to facilitating an Annual Community Needs Assessment. The updated process allows for increased community involvement and a more streamline process, which ultimately gave subrecipients the ability to apply for funding year-round. Staff will continue to evaluate procedures to ensure a streamline and strategic approach to addressing the goals in the Consolidated Plan.

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.

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 is currently in the process of scheduling three on-site monitoring visits for Meadowlark Apartments, The Portage Apartments, and Sand Hills.

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

The City monitored NHS activity undertaken 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 is currently the only sub-receptient with HOME funds that generated program income. NeighborWorks solely used HOME Program Income as down payment assistance for purchase of homes to low to moderate income individuals. IDIS reports no Program Income activity for the HOME Grant, because IDIS has blocked all HOME activity. The City is working with HUD to resolve this IDIS issue.

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, Habitat for Humanity, and Great Falls Housing Authority to analyze and strategically create affordable housing opportunities including; new construction, housing rehab, case management and counseling, and financial assistance.

Attachment

Analysis of Impediments

**Analysis of Impediments
to
Fair Housing Choice**

2015 - 2019

**City of Great Falls
Community Development
City of Great Falls, Montana**

April 2015

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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. Great Falls receives approximately \$914,000 (2014) annually from the following HUD programs: Community Development Block Grant (CDBG) and Home Investment Partnership (HOME). (Office of Community Planning and Development CPD Cross Program Funding Matrix, 2015)

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.

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

What is an impediment to Fair Housing Choice?

According to HUD's Fair Housing Planning Guide, impediments to fair housing choice are defined as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice.
- Any actions, omissions, or decisions that have this effect.
- Violations, or potential violations, of the Fair Housing Act.
- Actions counter-productive to fair housing choices, such as community resistance when minorities, persons with disabilities and/or low-income persons first move into white and/or moderate to high income areas, or resistance to the siting of housing facilities for persons with disabilities because of the person who will be occupy the housing.
- Actions that have the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status, or national origin.

Methodology

In order to complete a comprehensive Analysis of Impediments to Fair Housing Choice, hereafter AI, two public hearings were held during December 2014 and March 2015. The initial hearing was advertised in local newspapers, The Great Falls Tribune and Consumer Press (a free publication). Notices of both public hearings were also e-mailed to numerous organizations throughout the City and by personal contacts. The resulting 12 survey responses and 25 agency participants (March event) represented a very diverse group from Habitat for Humanity, Consumer Credit Counseling Services of Montana, Opportunities, Inc., NeighborWorks, Quality Life Concepts, landlords, tenants, public housing, City of Great Falls Fair Housing Specialist, and interested citizens, to name a few. The public hearings were a forum to define impediments as seen by the attendees, establish strategies, measurements and responsibilities.

A survey was sent to approximately 210 individuals (based upon mailing labels used in sending the letters) throughout the city by the City of Great Falls' CDBG/HOME Administrator. Of the approximate 210 surveys, 15 were filled out via email or hand delivered and does not include their comments recorded in the second input meeting, which referenced the survey questions during the participatory portion during the event. This data is used in the writing of this AI. (See Appendix B)

In completing the AI the following sources were reviewed or contacted:

- City of Great Falls Growth Policy Update 2013
- Great Falls City-County Growth Policy
- Great Falls zoning laws
- Complaints filed with:
 - The HUD Fair Housing office
 - The Montana State Human Rights Bureau
 - Montana Fair Housing
 - City of Great Falls Fair Housing Specialist
 - Montana Legal Services
- Home Mortgage Disclosure Act (HMDA)
- U.S. Decennial Census 2010
- Montana Census and Economic Information Center
- 2011-2013 American Community Survey (U.S. Census Bureau)
- Great Falls Area Housing Needs Assessment (conducted by the Great Falls Area Housing Plan Work Group)
- Interview of public hearing attendees
- 2010 housing survey of subsidized housing
- Internet
- HUD income guidelines and fair market rents for 2015
- Great Falls Tribune
- Habitat for Humanity
- NeighborWorks Great Falls
- Great Falls Housing Authority
- Opportunities, Inc.
- Other anecdotal data

The final draft was submitted for public review as an appendix to the **2015-2019** Consolidated Plan.

Executive Summary

In December 2014 and March 2015 public hearings (held in an open discussion format facilitated by the City of Great Falls Planning and Community Development staff) were held to gather information from the general population of Great Falls. Attendees were from the housing industry, financial organizations, mental health organizations, nonprofit service providers and residents. The purpose of the public hearings were to determine the housing needs and confirm goals and objectives for the upcoming **2015-2019** Consolidated Plan as well as identify barriers to fair housing choice. This feedback would be used to develop strategies that could be undertaken in partnership with local organizations to address those barriers and further the opportunity for fair housing choice.

The City Fair Housing Specialist and city Planning and Community Development staff worked with a variety of public and private stakeholders to identify impediments to fair housing choice. This included a review of public sectors: Great Falls zoning, building codes, permits and fees, public housing and Section 8 policies. Elements reviewed in the private sector included lending practices, affordability of housing in both the rental and homeownership arena.

Besides the public hearings, an Organizational Survey Questionnaire was distributed to an estimated 210 community members of which 15 surveys were mailed back. Results from the public hearings, surveys, and personal contacts resulted in retaining six impediments to fair housing choice selected for action. The AI was made available for public comment with the City of Great Falls Consolidated Plan, May 2 through May 31, 2015.

Strategies to Address Barriers

For each of the impediments and strategies discussed for the City of Great Falls, the designated lead staff person or organization will record all progress toward eliminating the stated impediment. A summary of the progress will be included as an appendix in the "Consolidated Plan for Great Falls" and will go through the appropriate public review and comment period. Final review will be accomplished by City staff, certified by the City Manager and approved by the Mayor and City Commissioners. This plan will be included in the **2015-2019** Consolidated Plan and the summary of progress will be included with the Consolidate Annual Performance Evaluation Report.

The listed impediments were those selected through the public hearing process, surveys and interviews, and listed as priorities within the community. Priority was determined based on impact upon the community, the community housing survey, and discussion among participants. Priorities and strategies are discussed in the final section of this plan.

Great Falls has been and will continue to actively pursue its commitment to furthering fair housing choice within the community. In addition to the impediments and strategies noted in this five year plan, Great Falls will continue the numerous activities and partnerships previously established to increase fair housing awareness in the public and private sector. This plan will be reviewed on an annual basis.

Impediments to Fair Housing Choice

Public:

1. HUD fair market rents are not competitive with local market rents (**too 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 with Housing Choice Vouchers results in a lack of housing and mobility for those that are using this program. **(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)**

Great Falls Background Data: Demographics, Income Data and Employment

General Overview

Great Falls, Montana is located along the banks of the Missouri River in Cascade County. Geographically located in the central region of the state the geography is typical of the Northern Plains with grasslands and mesas. The city is bordered on the east by the Highwood and Little Belt mountains while to the west the Rockies dominate the skyline.

The City of Great Falls has a population of 59,091 persons. The local economy is based on agriculture, retail, healthcare and defense.

Generally, the economy in Great Falls is fairly stable with neither dramatic growth nor decline. This is also true of the population.

| Population Comparison 2010 Census versus 2013 ACS | | |
|--|---------------|---------------|
| 2010 – 58,505 | 2013 – 59,051 | Increase: 586 |

Source: Montana Census and Economic Information Center, July 2008.

During the first half of the 1990's a shift to a service and retail economy started and has continued with limited growth in the industrial arena.

In 2010 the U.S. Census showed 6,740 minority residents of which 1,978 were of Hispanic (of any race) origin. Whereas the 2000 census shows 5,316 of which 1,354 are of Hispanic or Latino (of any race). The 2011 - 2013 American Community Survey 3-Year Estimates show an estimate 7,360 minority races of which 2,554 are Hispanic or Latino (of any race). This is an increase of 2,044 minority residents in a thirteen year period.

Poverty

In 2011-2013, 19.5 percent of the people were in poverty. Thirty-three (33) percent of related children under 18 were below the poverty level, compared with seven (7) percent of people 65 years old and over. Fourteen (14) percent of all families and Forty-one (41) percent of families with a female householder and no husband present had incomes below the poverty level. (2011-2013 American Community Survey 3-Year Estimate)

| Housing units, 2000 – 2013 | | | | |
|----------------------------|--------|---------|--------|---------|
| City of GF | 2000* | Percent | 2013* | Percent |
| Single-Family Units | 16,450 | 65.1 | 17,898 | 66.8 |
| Multi-Family Units | 7,771 | 29.5 | 7,472 | 27.9 |
| Mobile Homes** | 1,342 | 5.3 | 1,410 | 5.3 |
| Total Housing Units | 25,253 | | 26,780 | |

Source:* U.S. Census, ACS **2013 ACS data plus actual number of permits issued by City of Great Falls Community Development Department 2013 through 2015, *** includes modular and manufactured homes.

Single family units comprise the largest percentage of the housing units in Great Falls. These units are traditionally the least affordable, due in part to higher land cost and construction cost. The table shows a decline in multi-family housing resulting in a hardship for individuals seeking rental units.

Ethnic and Racial Population of Great Falls

| Great Falls 2013 Racial and Ethnic Distribution | | | |
|--|--------------------|--------------------|--------------------|
| | <u>2011 - 2013</u> | <u>2010 Census</u> | <u>2000 Census</u> |
| White | 51,731 | 51,765 | 50,996 |
| Black or African American | 507 | 617 | 540 |
| American Indian and Alaska Native | 3,176 | 2,942 | 2,888 |
| Asian | 601 | 510 | 485 |
| Native Hawaiian and Other Pacific Islander | 0 | 76 | 49 |
| Some other race | 582 | 365 | 341 |
| Total Population** | 59,091 | 58,505 | 56,690 |
| Hispanic or Latino(of any race) | 2,554 | 1,978 | 1,354 |

**The racial and ethnic distribution numbers may add to more than the total population because individuals may report more than one race.

Source: 2000 and 2010 U.S. Census , 2011-2013 American Community Survey 3-year estimates

Minority Concentration

A review of the CPD Maps provided by HUD reveals that there are several concentrations of minority races in Great Falls: American Indians are located in all census tracts with the highest concentrations in tracts 2 3, 9, and 107; persons of Hispanic Origin in all census tracts with the highest concentration in tracts 4, 9, 12, 106 and 107. Note that tract 107 consists primarily of county land: only the Great Falls International Airport is located within city limits. Please note that Malmstrom Air Force Base is located in Tract 12 resulting in a high concentration of all races (See Attachment D).

Economic Trends

The “base economy” of Great Falls includes agriculture and livestock, military, state and federal government, light manufacturing, healthcare, and service industries. Using cost of living comparisons provided by commercial sites such as AreaVibes, resulted in an A+ rating of 92 based on a scale of 100. The cost of living in Great Falls is 5.4% less than the Montana average and 8.4% less than the national average. Housing was rated less favorably (C+) on this same scale due to lower percentage of ownership and lower median home price.

The Bureau of Labor Statistics Economy at a Glance shows a positive 12-month percentage change in the Education and Health Services field, while employment is nearly all other sectors declined.

Labor Force Characteristics and Unemployment

The 2000 and American Community Survey for 2011-2013 censuses provides the following data:

| | Labor Force Status | |
|----------------------------|--------------------|-----------------------------------|
| | <u>2000</u> | <u>2011-2013 3-year estimates</u> |
| Persons 16 or over | 42,035 | 46,601 |
| In labor force | 26,501 | 29,013 |
| Civilian Labor Force | 24,926 | 27,696 |
| Employed | 23,273 | 26,262 |
| Unemployed | 1,653 | 1,434 |
| Armed Forces | 1,575 | 1,317 |
| Females 16 or over | 22,363 | 24,350 |
| Females in the labor force | 12,422 | 14,349 |

Source: 2000 Census, 2011-2013 American Community Survey 3-year estimates

The labor force in Great Falls continues to expand at a moderate rate. According to the Bureau of Labor Statistics January 2015 saw an unemployment rate of 5.1%.

As more of the population approaches 55 or older there may be shortages of entry level workers and an increase in an aging workforce. According to the 2011-2013 American Community Survey it is estimated that 17,165 individuals are over the age of 55 while the 2010 Census showed that 16,741 individuals were over age 55, a small increase of elderly population by 424.

Employment Characteristics

The largest employers in Great Falls are portrayed below:

| <u>Top 10 Private Employers in Great Falls</u> | | | |
|---|---------------------------|----------------------------|------------------|
| Private Sector | | | |
| <u>Rank</u> | <u>Employer</u> | <u>Business Type</u> | <u>Employees</u> |
| 1. | Benefis Healthcare | Hospital | 2,732 |
| 2. | Asurion | Warranty/Service Plans | 552 |
| 3. | Walmart Stores | Retailer | 475 |
| 4. | Great Falls Clinic | Services for Disabilities | 407 |
| 5. | Easter Seals-Goodwill | Construction | 305 |
| 6. | Centene | Insurance | 319 |
| 7. | Albertsons | Grocery Store | 280 |
| 8. | University of Great Falls | University | 229 |
| 9. | Missouri River Care | Nursing and Rehabilitation | 225 |
| 10. | Davidson Companies | Financial Services/Travel | 224 |

Source: "2014 The Great Falls Chamber of Commerce Community Guide"

Malmstrom Air Force Base

Malmstrom AFB, home of the 341st Space Wing, is one of the largest employers in Great Falls as well as a large contributor to the local economy. Malmstrom AFB saw a decline in their overall mission when 50 Minuteman Missiles were deactivated. The Base accounts for over 40 percent of the City's economic base. As part of the community its military members are active in contributing and sharing in numerous volunteer activities. The 120th Airlift Wing of the Montana Air National Guard is transitioning to C-130 cargo-carrying aircraft from previous fighter jet operations, including a \$22 million hanger under construction. It is anticipated for 2016. Source: "2015 The Great Falls Chamber of Commerce Community Guide"

| Top 5 Public Employers in Great Falls | | | |
|--|--|----------------------|------------------|
| Public Sector | | | |
| <u>Rank</u> | <u>Employer</u> | <u>Business Type</u> | <u>Employees</u> |
| 1. | Malmstrom Air Force Base (outside city limits) | Military | 4,693 |
| 2. | Great Falls Public Schools | Public School System | 2,035 |
| 3. | Montana Air National Guard | Military | 1,229 |
| 4. | City of Great Falls | City government | 541 |
| 5. | Cascade County | County government | 500 |

Source: "2014 The Great Falls Chamber of Commerce Community Guide"

Household, Income and Poverty

Family Size and Household Composition

The American Community Survey 3-year estimate (2011-2013) shows an estimated 24,629 households, down 672 households from the 2010 Census which showed 25,301 households. The survey estimates that the average family size is 2.98 while in 2010 the average family size was 2.88 persons. Of the total households 60.5% (up from 59.8% in 2010) were family households and 39.5% (compared to 40.2% in 2010) were non-family households. (2011-2013 American Community Survey 3-year estimates)

Income and Poverty

The median household income for all households in Great Falls was \$42,487 compared to \$32,436 in 2000, and the family median income was \$56,049 compared to \$40,107 in 2000. (Source: 2000 Census and 2011-2013 American Community Survey). In 2011-2013, 19.5 % of the people were in poverty. Twenty-seven (27) percent of related children under 18 were below the poverty level, compared with 7 percent of the people 65 years old or over. Fourteen percent of all families and 41 percent of families with a female householder and no husband present had income below the poverty level. (2011-2013 American Community Survey 3-year estimates)

The 2015 HUD income guidelines are presented below:

| Family size | HUD Income Guidelines for 2015 – Great Falls | | | | | | | |
|-----------------------|--|--------|--------|--------|--------|--------|--------|--------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
| Extremely Low Income* | \$12,950 | 15,930 | 20,090 | 24,250 | 28,410 | 32,570 | 36,720 | 40,600 |
| Very Low Income** | \$21,550 | 24,600 | 27,700 | 30,750 | 32,250 | 35,700 | 38,150 | 40,600 |
| Low Income*** | \$34,440 | 39,400 | 44,300 | 49,200 | 53,150 | 57,100 | 61,050 | 64,950 |

* Extremely low income at or below 30% of median family income
 ** Very low income at or below 50% of median family income
 *** Low income 51-80% of median family income

Source: http://www.huduser.org/portal/datasets/i/0115/Section8_IncomeLimits_Rev.pdf

Poverty

The poverty level is defined by the federal government on an annual basis and varies with household size.

| Size of Family | Poverty Thresholds 2015 | |
|----------------------|-----------------------------|--|
| | Weighted average thresholds | |
| One person | \$11,770 | |
| Two persons | \$15,930 | |
| Three persons | \$20,090 | |
| Four Persons | \$24,250 | |
| Five persons | \$28,410 | |
| Six persons | \$32,570 | |
| Seven persons | \$36,730 | |
| Eight persons | \$40,890 | |
| Nine persons or more | \$44,346 | |

Source: Office of The Assistant Secretary for Planning and Evaluation, Poverty Thresholds for 2015

| Census Tract | Areas of Poverty Concentration by U. S. Census Tract for Great Falls | | |
|--------------|--|--------------------|-----------------|
| | 2013 Population | Persons in Poverty | Percent Poverty |
| 1 | 2,628 | 556 | 21% |
| 2 | 4,124 | 155 | 4% |
| 3 | 3,001 | 635 | 21% |
| 4 | 1,983 | 516 | 26% |
| 108 | 3,918 | 481 | 11% |
| 7 | 1,938 | 600 | 30% |
| 8 | 1,763 | 177 | 10% |
| 9 | 3,041 | 636 | 21% |
| 10 | 2,998 | 256 | 9% |
| 11 | 4,414 | 1,111 | 25% |

| | | | |
|----|-------|------|-----|
| 16 | 4,809 | 1807 | 38% |
| 17 | 2,262 | 139 | 6% |
| 18 | 3,597 | 320 | 9% |
| 19 | 5,581 | 87 | 2% |
| 21 | 4,037 | 674 | 17% |
| 22 | 6,230 | 683 | 11% |
| 23 | 7,244 | 282 | 4% |

Note: Tracts 17, 21, 22, 23 are partial tracts that include City of Great Falls and County of Cascade numbers. Percent poverty is for that census tract only.

Source: 2009-2013 American Community Survey 5-year estimates

According to the data most individuals rated as being in poverty are located in the central residential and downtown area of Great Falls, census tracts 4, 7, 9, and 16. In contrast tracts 4, 7, 9, 16, 21, and 108 are classified as Low to Moderate Income areas. Tract 21 contains largely county lands (CPD Maps, Appendix A). Note: this data differs slightly from other sources of information in the Analysis of Impediments due to the census tract level analysis of poverty; the most recent data at this level was 5-year, rather than 3-year estimates.

Great Falls Current Fair Housing Legal Status

Fair Housing Testing, Complaints and Legal Findings

Discrimination complaints, lawsuits and settlements can provide a snapshot of fair housing problems within a jurisdiction. Complaints, lawsuits and settlements can also be used to measure the severity of discrimination in housing, hence an impediment to furthering fair housing. The four organizations normally contacted with fair housing complaints from Great Falls are the City of Great Falls Fair Housing Specialist, Montana Fair Housing (a non-profit organization located in Butte, Montana), Montana Human Rights Bureau, and the Denver HUD Office. The City of Great Falls Fair Housing Specialist is a clearing house for referrals and information but does not perform any compliance/enforcement activity.

Fair Housing Testing and Complaints

E-mails requesting information on discrimination complaints were sent to Montana Fair Housing, Montana Human Rights Bureau and the Denver HUD office. Numbers submitted by the Great Falls Fair Housing Specialist were referred to the, afore mentioned agencies.

Montana Fair Housing is the main agency referred to by City staff. Montana Fair Housing receives complaints, completes basic intake information, logs the data in its data base, investigates complaints, conducts testing, and provides mediation and negotiation services.

Testing:

Montana Fair Housing has and will continue to perform testing in Great Falls. In 2014 six tests were performed with 5 showing a difference in treatment. Montana Fair Housing received 93 calls in 2014.

Complaints:

The following tables show complaints received by the various agencies for Great Falls. It should be noted that the tables include not only federal protected classes but additionally the three protected classes recognized by the state of Montana: age, marital status and creed.

Great Falls Fair Housing complaints filed from January 2010 to December 2014 with HUD Office in Denver.

| <u>Protected Class</u> | <u>2010</u> | <u>2011</u> | <u>2012</u> | <u>2013</u> | <u>2014</u> |
|------------------------|-------------|-------------|-------------|-------------|-------------|
| Race | 2 | 1 | 2 | 0 | 0 |
| Color | 0 | 0 | 0 | 0 | 0 |
| Religion | 0 | 0 | 0 | 0 | 0 |
| Sex/gender | 3 | 0 | 0 | 0 | 0 |
| Disability | 0 | 0 | 5 | 2 | 0 |
| Familial Status | 3 | 0 | 0 | 0 | 0 |
| National Origin | 0 | 0 | 0 | 0 | 2 |
| Martial Status | 0 | 0 | 0 | 0 | 0 |
| Age | 0 | 0 | 0 | 0 | 0 |
| Creed | 0 | 0 | 0 | 0 | 0 |

Source: Freedom of Information Request with HUD for 2014, March 2015 Fair Housing Specialist

Both complaints in 2014 found no cause determination.

Great Falls Fair Housing complaints filed from January 2010 to December 2014 with Montana Human Rights Bureau.

| <u>Protected Class</u> | <u>2010</u> | <u>2011</u> | <u>2012</u> | <u>2013</u> | <u>2014</u> |
|------------------------|-------------|-------------|-------------|-------------|-------------|
| Race | 1 | 0 | 0 | 0 | 1 |
| Color | 0 | 0 | 0 | 0 | 0 |
| Religion | 1 | 0 | 1 | 1 | 0 |
| Sex/gender | 1 | 0 | 1 | 0 | 3 |
| Disability | 4 | 0 | 3 | 1 | 1 |
| Familial Status | 0 | 0 | 0 | 0 | 1 |
| National Origin | 1 | 0 | 0 | 0 | 0 |
| Martial Status | 0 | 0 | 1 | 0 | 0 |
| Age | 1 | 0 | 0 | 0 | 0 |
| Creed | 0 | 0 | 0 | 0 | 0 |

Source: Montana Human Rights Bureau submission March, 2015

During 2014 the Montana Human Rights Bureau addressed one case for disability (under "cause" as of 3/25).

Great Falls Fair Housing Complaints Filed from January 2010 to December 2014 with Montana Fair Housing.

| <u>Protected Class</u> | <u>2010</u> | <u>2011</u> | <u>2012</u> | <u>2013</u> | <u>2014</u> |
|------------------------|-------------|-------------|-------------|-------------|-------------|
| Race | 0 | 0 | 5 | 0 | 2 |
| Color | 0 | 0 | 0 | 0 | 0 |
| Religion | 0 | 0 | 0 | 0 | 0 |
| Sex/gender | 0 | 8 | 0 | 0 | 3 |
| Disability | 9 | 15 | 7 | 1 | 1 |
| Familial Status | 0 | 4 | 5 | 1 | 2 |
| National Origin | 0 | 7 | 0 | 0 | 2 |
| Martial Status | 0 | 2 | 3 | 0 | 0 |
| Age | 0 | 1 | 0 | 0 | 0 |

| | | | | | |
|-------|---|---|---|---|---|
| Creed | 0 | 0 | 0 | 0 | 0 |
|-------|---|---|---|---|---|

Source: Great Falls Annual AI Updates for 2011, 2012, 2013, and MT Fair Housing

During 2009 Montana Fair Housing settled three cases in disabilities and one familial status by conciliation.

| Great Falls Fair Housing complaints filed from January 2010 to December 2014 with City of Great Falls Fair Housing Specialist | | | | | |
|---|------|------|------|------|------|
| Protected Class | 2010 | 2011 | 2012 | 2013 | 2014 |
| Race | 5 | 2 | 0 | 0 | 1 |
| Color | 0 | 0 | 0 | 0 | 0 |
| Religion | 0 | 0 | 1 | 1 | 0 |
| Sex/gender | 2 | 7 | 1 | 0 | 4 |
| Disability | 5 | 4 | 3 | 1 | 1 |
| Familial Status | 3 | 1 | 0 | 0 | 0 |
| National Origin | 0 | 0 | 0 | 0 | 0 |
| Martial Status | 0 | 0 | 1 | 0 | 0 |
| Age | 0 | 0 | 0 | 0 | 0 |
| Creed | 0 | 0 | 0 | 0 | 0 |

Note: All complaints were referred to Montana Fair Housing.

Source: City of Great Falls Annual AI Updates for 2013, 2012, 2011

All complaints were referred to Montana Fair Housing, Montana Human Rights Bureau or HUD. The numbers show that most complaints are based on disability and the majority of these complaints dealt with assistive, therapy or service animals.

Organizational Survey Questionnaire

Approximately 210 surveys were distributed through numerous health services organizations, Great Falls Housing Authority, Retired Senior Volunteer Program and Opportunities, Inc., plus others. The exact number is unknown because many organizations e-mailed the survey to clients and other organizations. Surveys were also given to the Great Falls Housing Task Force, landlord associations and to members of the public hearing. The survey was designed to assess the community's general level of understanding and experience with not only fair housing issues but the housing needs of the community for the next five years under the Consolidated Plan. Questions 11-20 deal largely in housing discrimination (See Appendix B). This was not a scientific survey but with 15 official email/letter responses and its inclusion in a March 3rd 2015 input meeting, it did provide a picture of possible discrimination in the community as well as information indicating the need for greater education in fair housing. See appendix B for survey and comments by those taking the survey.

A review of the survey shows the following perceptions by those that took the survey:

- All but one of the written respondents (14/15) chose the option b.) "report it to an agency that would act" in regards to question 16. If you were aware of a housing discrimination act, what would you do?
- 5/15 (33%) of respondents indicated that they or someone they know had been a victim of housing discrimination
- Common terms included
 - "affordable"
 - "slumlords"

- “working poor”
- “decent housing”

Questions 11 through 20 showed the following as serious barriers to fair housing in Great Falls as seen by those surveyed:

- Need for more ADA accessible units and unit modification for protected groups such as elderly
- Residents are not familiar with their fair housing rights.
- Quality of rental properties and housing stock is substandard
- There is testimony of ethnic discrimination of minorities (Native American) for Question 13. See Appendix B

Summary of Fair Housing Profile in Great Falls

- The results of the Community survey and complaints received suggest that the Great Falls community members do experience discrimination in housing. In addition to the formal complaints and referrals, One-third of nonprofit or faith-based respondents indicated that they or someone they know had been a victim of housing discrimination. Agencies indicated discrimination most often occurs due to disability or race. While complaints to the city Fair Housing Specialist has decreased from 2010, this may be due to decreasing work hours to ten hours per week in 2013.

It is notable that no complaints surrounding real estate and financial transactions were noted.

Public Sector Impediments and Additional Programs

In August 2013 the Great Falls City Commission adopted “The City of Great Falls Growth Policy Update”. Generally, a Growth Policy, formerly known as a Comprehensive Plan, is an official document adopted by a local government as a broad body of public policy to guide decisions about the physical, social, and economic development of a community. The essential characteristics of a Growth Policy are general, comprehensive, and long range: It is general in that it analyzes and summarizes community-wide issues and trends in order to recommend broad goals, objectives, and policies. It is comprehensive because it focuses on the entire community and all functional aspects of development as a single unit, with all components working together, not apart. The Growth Policy is long-range because it looks beyond pressing current issues to the potential problems and opportunities five or ten years or more into the future. The following discussions on zoning and subdivisions, codes, infrastructure, permits and fees and processing are from the “Growth Policy” document (Source: “The City of Great Falls Growth Policy Update” 2013).

Zoning and Subdivision Regulations

Areas of the City are zoned for medium density multi-family residential use (“R-5 Multi-Family Medium Density”) and for high density multi-family use (“R-6 Multi-Family High Density”). The “R-6” zoning district is intended to accommodate multi-family units of the highest density on parcels that have sufficient area to accommodate required parking and landscaping. Multi-family residential development projects proposed for properties zoned “R-5” and “R-6” are subject to design review criteria through an open meeting process. As long as design and site requirements are met, development of multi-family residential housing in an “R-5” or an “R-6” zoning district is not restricted.

Building Codes and Enforcement

The enforcement of building codes in the City is not considered to be a constraint to residential development since most lenders and buyers demand that houses must meet the Montana State Adopted Codes or similar

regulation. However, the enforcement of building codes in existing housing units is an issue, especially in the City's older neighborhoods where property owners may not have the funds to repair problems and bring the units up to code.

Cost and Availability of Infrastructure

The condition and capacity of the streets, utilities, and other public facilities in the Great Falls area are generally sufficient to accommodate growth into the future.

Permits and Fees

The City collects fees that affect the cost of developing housing in Great Falls area. For example, building/zoning permit fees can contribute to the cost of building or remodeling housing. The largest impact on housing cost is the infrastructure such as sewers, water mains, etc. During the review for the AI this was observed as being necessary for the future of quality development.

Timely Processing of Permits for Development Projects

The City has relatively streamlined procedures for reviewing and approving development projects. Most proposals that conform to existing zoning, subdivisions, and building codes can obtain building permits within a few weeks or less. Request for new subdivisions, zoning changes, or conditional use permits are usually resolved within a few months. As a policy, the City of Great Falls attempts to keep the development review process as quick and efficient as possible. This does not seem to be a significant housing issue.

Malmstrom Air Force Base Housing

Malmstrom AFB currently has 1,116 housing units in the inventory. There are zero housing units under construction at this time. The waiting list for airman varies significantly depending on the season. On average, two bedrooms are the highest in demand at 100+ on the waiting list at any given time. 0-50 individuals are waiting for three bedrooms and 0-20 waiting for four bedroom units. This number includes the newest 111 renovated units and 278 newly constructed units. (Source: Malmstrom AFB Housing Office telephone inquiry April 27, 2015).

Public Housing, Section 8 and Subsidized Housing

Great Falls Public Housing Authority

The Great Falls Housing Authority owns and manages 490 public housing units located at five geographically separated sites. These sites are discussed below:

The Great Falls Housing Authority main site is located at 1500 Sixth Avenue South and consists of 356 units; 156 units were constructed in the early 1940's and 40 of these units were substantially rehabilitated in 1982. In 1986 a major rehabilitation began on the additional 116 units. In 1998 a program designed to modify 200 additional units was started and completed in 2001. The Housing Authority will continue the multi-year rehabilitation project at the main site (MT2-1 and MT2-2) which involves upgrading the overhead electrical distribution system, street lights, sewer mains, water mains and gas distribution systems for 356 units and major interior renovation of 156 units. The units will be demolished down to the studs and rebuilt, including new roofs; windows; doors; walls; flooring; electrical, plumbing and heating systems. Exterior sewer, water and electrical services will also be replaced. The overall project will take 10 to 15 years to complete

15

In 1973, 50 units were constructed at Sunrise Court located at 5115 Third Avenue South. These units have gone through complete interior and exterior rehabilitation. This phase was completed in 2004 and the second phase was completed in 2006. Rehabilitation included asbestos abatement, new doors, windows, siding, kitchen cabinets, bathrooms, flooring and section 504 requirements.

In 1980, 20 units were constructed at 3313 Eleventh Avenue South known as the Russell site. This project is in good condition. The Great Falls Housing Authority partnered with the Air Force Red Horse organization located at Malmstrom Air Force Base and completed a major landscaping project in 2001. 2009 and 2010 saw a complete renovation of the Russell site to include asbestos abatement, new doors, windows, siding, kitchen cabinets, bathrooms, flooring and section 504 requirements.

Also in 1980, 30 units were constructed at 2700 Sixteenth Avenue South known as Yeoman-Tynes. This site was completely modernized and completed in December 2008.

In 1982, 34 units were constructed at 1622 Third Avenue North, known as Austin Hall which serves elderly and disabled residents. Nine units and the community room are completing total rehabilitation and were ready for occupancy during December 2004.

The Great Falls Housing Authority administers 250 Housing Choice Vouchers serving a population of approximately 250 families. As of January 2014, 119 families are currently on the waiting list for public housing and 100 families for Housing Choice Vouchers. The waiting time for Housing Choice Vouchers is approximately two to five years depending upon bedrooms and availability of vouchers.

Lead based paint abatement and removal requirements when first implemented were a major concern resulting in landlords not participating in the Housing Choice Voucher program. After discussing this with housing authority staff, participation in the voucher program has not become a problem, in part due to working closely with landlords on abatement and removal requirements.

The Great Falls Housing Authority has been rated as a "High Performer" by HUD nine of ten years from 2000-2010. The quality of housing and customer service provided for residence is outstanding (Source: Great Falls Housing Authority Interview).

The Great Falls Housing Authority Five Year Plan includes substantial remodel at the main site to include underground utilities. It is estimated that the project will take approximately five years to complete and is currently under construction in 2015.

The Sandhills site is a new moderate income housing project under construction. The first 4-plex, of four 4-plexes, was completed in 2010. In 2013, the Great Falls Housing Authority completed the second phase of its Sand Hills project which included two four-plexes that are accessible, resulting in a total of 16 affordable housing units.

The Housing Authority will have 719 units of public housing when including vouchers; however, four units will be unavailable at the main site (previously known as Parkdale) because of renovation. The Housing Authority will provide 32 units of affordable housing (16 units at Holland Court and 16 units at Sand Hills. Eight of the 16 units at Holland Court, two of the units at Sand Hills and 22 of the 490 units of public housing are handicap accessible units (including five units at Austin Hall, a 34 unit elderly housing project where the entire building is accessible).

As of February 2014 the Housing Authority was administering 265 Housing Choice vouchers and anticipates administering the same number in the upcoming year. As of February 2014 the waiting list for public housing

was 101 families. The average wait for public housing is four to six months. The waiting list for Housing Choice vouchers was 223 families and the average wait time is one year to one and one-half years.

Opportunities, Inc.

“Opportunities, Inc. is dedicated to the principal that all people have the right to be self sufficient in providing for their own needs without discrimination; that they have equal opportunity for education training, employment and career advancement; and , that they have just access to the necessities for physical, psychological and spiritual well being.” (Source: Opportunities, Inc. mission statement) The purpose of the HUD Housing program is to “enable low and moderate income families to live in decent, safe, sanitary, and affordable housing.” They provide a direct rental subsidy and administer the voucher program as an HRDC receiving federal funds through the Montana Department of Commerce.

As of March 2014 Opportunities, Inc., was administering 475 Housing Choice vouchers and 141 mod rehab units and anticipates maintaining a similar level of administration in the coming year. As of March 2014 there were 3,365 families on the waiting list for Housing Choice vouchers, with an average wait time of three and one-half years. It is of note the people on Opportunities, Inc. waiting list could be duplicated on the Housing Authority Housing Choice waiting list.

Opportunities, Inc., will provide rental assistance and have a security deposit revolving account to assist low income households who are renting. The agency will also own and maintain a 16 unit apartment building (Kennedy Apartments) where rent levels are kept as low as possible for low income renters.

Acceptance of Tenant Based Section 8

According to the Great Falls Housing Authority staff, there have been minimal complaints received regarding the rejection of Section 8 eligible individuals and families by landlords and property managers. Of the few complaints received by the City of Great Falls Fair Housing Specialist the reasons stated were paperwork required, lack of payment for damages, and problems that have happened in the past with Section 8 renters. The Housing Authority raised their payments to 110% to be competitive with the rental market thus insuring a reasonable pool of Section 8 accepting landlords and property managers. Fair market rents (FMR) have dropped in the Great Falls MSA for the past several years, including FY 2015. Due to fair market rents being lower than local rents housing units continue opting out of the HUD program. See impediment 1.

Subsidized Housing

A survey of subsidized housing was accomplished during the month of January 2014 to ascertain availability of subsidized housing. The survey includes public housing operated by the Great Falls Housing Authority. Other properties are privately owned subsidized housing where the federal government, either through state channels or directly, provides subsidies to the owner who then applies the subsidies to the rent charged to low income tenants. There are privately owned subsidized housing units for seniors and people with disabilities, families and individuals. Accessibility is based on units available for individuals who are mobility impaired. A request by several human services agencies to ascertain the number of roll-in showers available in subsidized housing resulted in 116 units with roll-in showers being reported.

| Summary of Subsidized Housing Statistics – January 2014 | | | |
|---|-----------------------|-------------------------|--------------------------|
| <u>Units (Occupied)</u> | <u>Occupancy Rate</u> | <u>Accessible Units</u> | <u>Disabled Occupied</u> |
| 1,350 (1,273) | 94% | 272 | 91 |
| See Appendix C for complete survey. | | | |

Numerous landlords stated that they advertise the availability of accessible units throughout the City but very few apply, hence the discrepancy between accessible units and disabled occupied. This has been the trend for several years.

Summary of Impediments in the Public Sector

There is only one impediment in the public sector: “HUD fair market rents are not competitive with local market rents (they are low) resulting in the opting out from HUD programs and fewer housing units for *subsidized rents*”.

Age and Quality of Housing Stock

| Year Structure Built | Estimate | Percent |
|-----------------------|----------|---------|
| Total housing units | 25,708 | |
| Built 2005 or later | 182 | 0.7% |
| Built 2000 to 2004 | 2,118 | 7.9% |
| Built 1990 to 1999 | 1,628 | 6.1% |
| Built 1980 to 1989 | 1,397 | 5.2% |
| Built 1970 to 1979 | 3,824 | 14.3% |
| Built 1960 to 1969 | 5,388 | 20.1% |
| Built 1950 to 1959 | 4,570 | 17.1% |
| Built 1940 to 1949 | 2,870 | 10.7% |
| Built 1939 or earlier | 4,803 | 17.9% |

Selected Housing Characteristics, 2011-2013 American Community Survey 3-year Estimates

The large percentage of housing stock in Great Falls is 35 years or older (80%). Nearly half (45.7%) of all housing units in Great Falls were built before 1960. This is considerably older housing stock than the State of Montana. As the community’s housing units continue to age, increased investment for maintenance, repairs, rehabilitation, and replacement will be needed to maintain the quality of living conditions and prevent deterioration of neighborhoods. (American Community Survey 3-year Estimates)

The quality of housing has always been at the forefront of discussion with low income tenants. The 2011-2013 ACS estimates that 27 units lack plumbing, (both hot and cold piped water, a flush toilet and a bathtub or shower), down from 201 in 2000, while 2011-2013 estimates show 210 units lacked complete kitchen facilities (installed sink with piped water, a range, convection or microwave oven; and a refrigerator) down from 381 in 2000.

Disproportionately Greater Needs

The City of Great Falls is over 87.5% White according to the 2011-2013 ACS. Other races account for around 5% or less for nonwhite races, with American Indian or Alaska Native amounting to the second largest percentage at 5.4%. Asian is 1% and Black or African American is less than 1%. Hispanic or Latino of any race amounts for 4.3%

Based upon the tables below, calculation has found that disproportionately greater needs to exist among certain racial or ethnic groups based on housing problems despite their small percentage of the population. Disproportionately greater need is defined by being at least 10% larger than the total income level (all races combined).

For 0%-30% AMI:

- 76.7% of extremely low income residents has one or more of the four housing problems provided, but all ten (100%) of Asian residents suffer from one or more housing problems.

For 30%-50% AMI:

- 60.2% of low income residents has one or more of the four housing problems provided, but 75% of Native American and nearly 93% of Hispanic residents suffer from one or more housing problems.

For 50%-80% AMI:

- 51.5% of moderate income residents has one or more of the four housing problems provided, but 71.4% of Hispanic residents suffer from one or more housing problems

For 80%-100% AMI:

- 22.1% of residents has one or more of the four housing problems provided, but 41.1% of Hispanic residents suffer from one or more housing problems

30%-50% of Area Median Income

| Housing Problems | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|--|---------------------------------------|--|
| Jurisdiction as a whole | 1,720 | 1,135 | 0 |
| White | 1,495 | 1,020 | 0 |
| Black / African American | 0 | 55 | 0 |
| Asian | 0 | 0 | 0 |
| American Indian, Alaska Native | 135 | 45 | 0 |
| Pacific Islander | 0 | 0 | 0 |
| Hispanic | 50 | 4 | 0 |

• **Table 1 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2007-2011 CHAS

- *The four housing problems are:
- 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

The City Community Development Department enforces various codes to ensure that housing units meet minimum safety requirements for the residents. The City supports the maintenance and rehabilitation of housing and residential neighborhoods through its code enforcement program.

Homeownership and Affordability

Housing affordability is affected by two independent factors: housing cost and household income. Housing costs have continued to grow steadily over the past decade, while income levels have not kept pace.

(Source Great Falls Growth Policy Update 2013)

Housing that is considered "affordable" is defined as housing units that have sales prices or rents that are within the means of a low or moderate income household. The private housing market does not generally provide affordable housing without some type of subsidy or incentive. Public agencies and non-profit organizations have been very active in housing programs, such as NeighborWorks and Habitat for Humanity. Despite their success, the ability of low and moderate income families to purchase housing has been adversely affected during the past decade as a result of costs rising faster than income levels.

NeighborWorks

Neighborhood Housing Services (NHS), aka NeighborWorks Great Falls will be allocated approximately \$22,7800 in CDBG funds for 2015/2016 for a revolving loan fund to provide down payment and closing cost assistance, new construction, purchase and rehabilitation of six housing units and other activities addressing neighborhood revitalization. NHS will also use prior year HOME funds through the Owners in Partnership Program to provide down payment and closing cost assistance to low to moderate income first-time homebuyers.

NHS is a 501(c)(3) non-profit organization whose overall goal is to provide safe, affordable housing for low income families. NHS is the primary affordable housing developer in Great Falls and is also the only Community Housing Development Organization (CHDO) and Community Based Development Organization (CBDO) in Great Falls. When an agency is designated as a CHDO and/or CBDO by HUD, it means the agency is eligible to apply for specific federal grant funds and undertake specific activities to address affordable housing within a community. These activities would include a CBDO using CDBG funds for new construction.

NHS's primary services include providing low interest loans and construction assistance to neighborhood low income homeowners for rehabilitation of their homes; purchasing and rehabilitating houses to be sold to low and moderate income households; constructing single family homes that are affordable for low to moderate income households; down payment and closing cost assistance; homebuyer education; foreclosure prevention loans; neighborhood wide clean-up and revitalization activities and special assistance to residents of targeted neighborhoods.

NHS will use Neighborhood Stabilization Program's program income funds to purchase lots with substandard buildings and demolish these structures. CDBG and HOME funds will be used to build new homes on these lots which will be available for sale to low income first-time homebuyers. The City will administer these funds through NHS.

NHS will administer a Section 8 Housing Choice Voucher Homeownership Program in partnership with the Housing Authority. This program involves Housing Authority current Housing Choice Voucher holders who are eligible being able to switch their rental vouchers to mortgage payments and pay 30% of their income toward a house payment rather than monthly rent. All eligible voucher holders will be required to participate in NHS's first-time homebuyer program and receive individual financial counseling. As of March 2013 no families were enrolled in the program but NHS and the Housing Authority anticipate serving two families in the upcoming year.

Rental Market and Affordability

According to the 2010 Census there are 25,301 occupied housing units of which 9,302 are specified renter occupied. The 2011-2013 American Community Survey 3- year estimates 26,780 total housing units with 24,619 occupied, and 9,461 are rental units. Since the 2010 census we see an increase in occupied housing and an increase of over 100 rentals. Below is the 2011-2013 ACS data for gross rent and the three year estimates for 2011-2013.

| Gross Rent | Number | Percent |
|-----------------|--------|---------|
| Less than \$200 | 460 | 5.0 |
| \$200 to \$299 | 572 | 6.2 |
| \$300 to \$499 | 2,186 | 23.7 |
| \$500 to \$749 | 3,255 | 35.2 |
| \$750 to \$999 | 1,577 | 17.1 |

| | | |
|--------------------|-----|-----|
| \$1,000 to \$1,499 | 809 | 8.8 |
| \$1,500 or more | 383 | 4.1 |
| No cash rent | 219 | |

Source: 2011-2013, American Community Survey 3-year Estimates

Current Great Falls Fair Housing activities

Affirmatively Furthering Fair Housing

The City aggressively pursued diverse avenues in expanding its philosophies and community involvement to affirmatively further fair housing through the following activities.

1. Annual updates to the Analysis of Impediments to Fair Housing Choice through 2014.
2. Outreach through education and networking continued to be the principal method of furthering fair housing. Activities undertaken during 2010 – 2015: (these activities will continue)
 - * distributed pamphlets community-wide free of charge (information involved fair housing, landlord and tenant law, advertising guidance, and accessibility guidelines)
 - * provided current information about fair housing on the City's Internet site
 - * presented discrimination and fair housing educational programs to approximately 283 individuals in 2014 through workshops at numerous agencies to include workshops sponsored by the City
 - * provide a monthly fair housing presentation to first time homebuyers and quarterly to the Great Falls Association of Realtors (Terry's Tidbits)
 - * participated in summer orientation event at Great Falls College-MSU and distributed fair housing information

Landlords Association,

 - * participated in community-wide workshops co-sponsored by the City, Opportunities, Inc., Neighborhood Councils and provided information about fair housing, landlord and tenant law, and housing regulations related to disabled people
 - * wrote articles about fair housing for newsletters for NeighborWorks and the Great Falls Housing Authority
 - * held 6 one-on-one landlord/property manager training sessions (8 hours total)
 - * actively participated as member of the Housing Task Force, Community Advisory Council, and the Local Individuals Network for Customized Services Landlords Association,
3. 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:
 - * conducted investigations of tenant complaints, sexual harassment complaints, and assistive animal rules and regulations at the Housing Authority
 - * reviewed Housing Authority leasing requirements and provided guidance on fraud, fair housing, service animals, and pet policies
 - * writing a fair housing column for the Housing Authority's newsletter about issues of concern to the public housing community.
4. From 2011 through 2015 the City Fair Housing Specialist responded to 3,140 housing complaints and information inquiries from landlords and tenants, a majority dealt with state landlord and tenant laws.
5. Provided conflict resolution services involving fair housing issues and formal mediations related to landlord-tenant law to all individuals, as requested.

6. The rental housing market, especially subsidized housing was monitored on an ongoing basis. As of January 2014 the vacancy rate of subsidized housing was approximately 6%, this rate has been fairly constant (5% - 6%) throughout the years. The National Low Income Housing Coalition released a report showing that in 2015 a Great Falls worker would need to earn \$11.38 an hour to afford a two bedroom apartment at fair market rate; this is up \$0.87 from 2009.
7. All enacted city ordinances were reviewed to ensure compliance with fair housing laws.
8. In recognition of Fair Housing Month, the Mayor of Great Falls, during the Commission Meeting, proclaims April as Fair Housing Month, at which time statistics from the previous year are mentioned.

Strategies to Address Impediments to Fair Housing Choice

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

Impediments

Public:

1. HUD fair market rents are not competitive with local market rents (too 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 with Housing Choice Vouchers results in a lack of housing and mobility for low income tenants. This impediment was revised to be broader in 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)**

Strategies and Measurements

Impediment 1 (Public Sector)

HUD fair market rents are not competitive with local market rents (too 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

Pending 2015 HUD consultation, HUD webinar sessions with CDBG/HOME administrator.

Will be monitored and compared with the next FY 2015 Fair Market Rent for all bedroom sizes.

Update:

Upon receipt of the "Final FY 2015 Fair Market Rents" (FMR) it has been noted that the market rents have slightly increased from 2014; efficiency units went from \$476 to \$485; one bedroom FMR increased from \$497 to \$505; two bedroom rents have increased from \$637 to \$648; three bedroom units went from \$922 to \$937; and four bedroom units increased from \$939 to \$955 in 2015. This impediment continues as stated above. The increase in fair market rents is below market rents being requested by owners at this time. Note: market rents decreased from FY 2013 to FY 2014.

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 in 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 current Fair Housing Specialist or a member of the Great Falls Planning and Community Development department will continue to 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.

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, following two (2) alleged complaints received in 2013. See "Fair Housing Complaints" attachment to 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, insurance and realty organizations) to procure and author educational handouts within each area of expertise.

Measurement and Responsibility

The Fair Housing Specialist will update the current list of organizations contacted, number of individuals trained, copies of educational material to the housing task force on a quarterly basis

Update: Ongoing. For example, during calendar year 2013, 409 individuals received education in fair housing during 18.5 contact hours.

Impediment 4 (Private Sector)

Lack of quality housing for low income with Housing Choice Vouchers results in a lack of housing and mobility for low income tenants. **(Counter-productive to fair housing choice)**

Strategy

1. Great Falls Planning and 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 City's Fair Housing Specialist. The City also employs a Code Enforcement Technician with partial funding from the CDBG program who addresses complaints or refers appropriate fair housing cases to the 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 based upon submissions and approval of City Commission.

Measurement

Number of razing permits and permits for repairs based upon complaints received. Number of projects funded by Community Development Block Grant (CDBG) funds and money expended.

Update: Community Development Block Grant funds were used to improve the quality of housing through the following projects during calendar year 2015: \$68,000 to fund the housing rehabilitation specialist (up from \$65,500 in 2013) who provides rehab counseling, loan processing, inspections, and construction monitoring for all CDBG-funded City revolving loan programs for low income individuals; \$31,031 for the City Planning and Community Development Code Enforcement Technician; \$68,341 for the rental improvement loan program (down from \$94,324 from 2013); \$22,780 to NeighborWorks Great Falls for down-payment assistance, purchase and rehabilitation of houses and revitalization activities in their Community Based Development Organization (CBDO)-designated neighborhoods.

Impediment 5 (Private Sector)

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

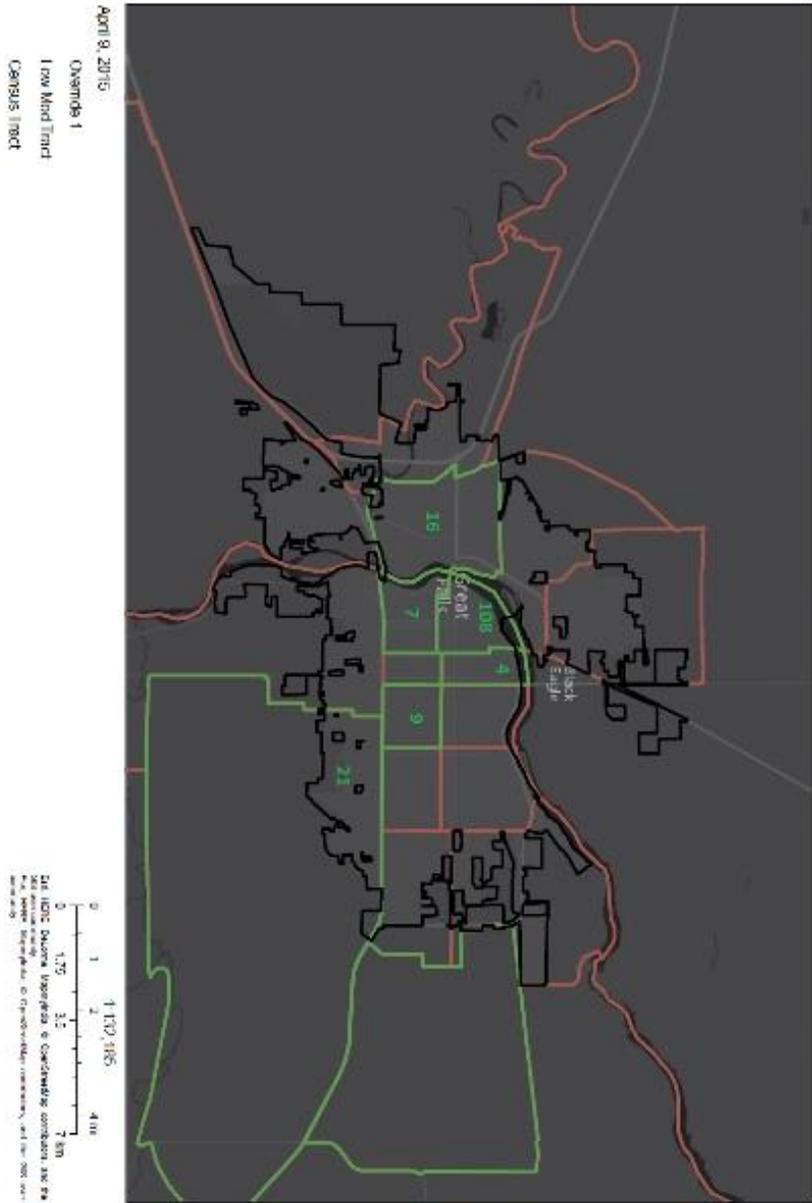
Track increase in request for program information and annual survey of agencies that request accessible / usable living for their clients. This will include tracking the number of newly constructed accessible units for elderly and occupancy rates.

Update:

In 2013, the Great Falls Housing Authority completed the second phase of its Sand Hills project which included two four-plexes that are accessible, resulting in a total of 16 affordable housing units. In 2014 Accessible Space Inc. began construction of a 38 unit project for residents 55 years or older. This will be fully accessible.

APPENDIX A:
HUD Low to Moderate Income Areas and Census
Tract Map, City of Great Falls

CPD Maps - Low-Moderate Income Tracts 2015 - Consolidated Plan & Continuum of Care Planning Tool



APPENDIX B:

2015-2019 CDBG Consolidated Plan
Organizational Survey Questionnaire
February 2015 – March 2015



P.O. Box 5021
Great Falls, MT 59403-5021
jwetterau@greatfallsmt.net

Telephone 406/455-8407
Hearing Impaired 406/454-0495

2015-2019 CDBG Consolidated Plan - Organizational Survey Questionnaire

Please find the following list of question to help the City better assess the needs of the community through the use of Community Development Block Grant and HOME Improvement Partnership funds. Your responses may be submitted to the Planning and Community Development office at the Civic Center located at 2 Park Drive S., Room 112 or mailed to the address above. Responses can also be submitted via email to Jolene Wetterau at jwetterau@greatfallsmt.net. Please submit your responses no later than March 20, 2015.

1. What is the name of your organization/office?
2. List the strengths and weaknesses of the housing sector in your area as they impact your customers and your organization. Please consider such factors as: housing affordability and accessibility, housing conditions, housing availability, convenience of location, transportation to services, non-profit capacity, public sector capacity, private sector capacity, financial resources, military housing, homeless housing, supportive housing, public housing, and housing infrastructure such as sewer, water, power, phone, garbage etc. services.
Think about who is and who is not well served, and why people are not well served.
3. What current housing needs in your area does your organization run up against most frequently? and for what groups?
4. What resources are available in the public or private sectors of the community to meet these housing needs? (Please consider the following and others: low and moderate-income renters/owners, military families, college students, young families, single parent households, work force households, as well persons who are: elderly; cognitively, sensory, physically, psychiatrically, and/or developmentally disabled; domestic-abuse victims; runaway or at-risk youth; homeless or individuals/families at risk of being homeless; living with significant chronic health conditions including HIV/AIDS, or substance abuse/chemically dependent.)
5. In your professional opinion, exactly what are the housing needs of the clients you serve? What are their other community service needs (i.e. jobs, transportation, health care, etc.)?
6. Please describe the gaps between current housing needs and resources in your area.
7. How have the housing needs in your area changed in the last five to ten years?
8. How do you expect your area's housing needs to change in the next five years to ten years?

9. Please describe the regulatory barriers or other barriers you perceive to affordable housing. Do they increase the costs of housing or act as a disincentive to the development of low-income housing affordable to residents with very low incomes?
10. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing for moderate income and middle income households are affected by: public policies including tax policies, land use controls, zoning ordinances, building codes, fees and charges, growth limits, or policies that affect the return on residential investment.
11. Have you or someone you know been a victim of housing discrimination? Yes or No
12. Does Great Falls have individuals practicing housing discrimination? Yes or No
13. Of the following protected classes (race, color, national origin, religion, sex, familial status (discrimination against children), disability, marital status, creed, age) which happens the most in Great Falls? Select only one.
 - a. Race b. color c. national origin d. religion e. sex
 - f. familial status g. disability h. marital status i. age j. creed
14. Where is the best place to learn to recognize and/or prevent housing discrimination?
 - a. On the Internet b. workshops c. friends d. read a book
 - e. Other _____
15. How important is housing discrimination to you?
 - a. Not so much b. a little c. somewhat d. a lot
16. If you were aware of a housing discrimination act, what would you do?
 - a. nothing
 - b. report it to an agency that would act (Dept. of Housing and Urban Development, Montana Fair Housing, Human Rights Bureau, Great Falls Fair Housing Specialist)
 - c. try to educate the parties involved
 - d. would not want to be involved even if I knew it was wrong
17. Other comments on housing discrimination in Great Falls.
18. Other comments about housing issues in your area.
19. Other comments about needs of the low-income persons in your area.
20. How does your organization define affordable housing?

APPENDIX C:

Great Falls Subsidized Housing Statistics as of January 2, 2014

Appendix C: Subsidized Housing statistics as of January 2, 2014. 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 2, 2014

| Name | #Units (Occupied) | Occupancy Rate | Accessible Units / #filled by Mobility Impaired | | |
|----------------------|---------------------------------|----------------|---|-----------|-------------|
| Autumn Run** (***) | 120 | | 52 | / | |
| Cascade Ridge** | 40 (40) | 100% | 40 | / | *4 |
| Mountain View** | 48 (44) | 92% | 16 | / | 4 |
| Town site Apts. ** | 20 (18) | 90% | 10 | / | 0 |
| Sand Hills ** | 16 (16) | 100% | 16 | / | 1 |
| Holland Court ** | 16 (16) | 100% | 8 | / | 4 |
| Yeoman | 30 (29) | 97% | 2 | / | 1 |
| Russell | 20 (18) | 90% | 0 | / | 0 |
| Sunrise | 49 (48) | 98% | 3 | / | 3 |
| Austin Hall | 34 (34) | 100% | 5 | / | 5 |
| Area 22 (GFPHA) | 200 (179) | 90% | 14 | / | 14 |
| Area 25 (GFPHA) | 152 (134)(4 rehab) | 88% | 0 | / | 0 |
| Vista Villa | 96 (90) | 94% | 0 | / | 0 |
| Elmore Roberts | 60 (50) | 83% | 3 | / | 0 |
| Park Manor | 101 (99) | 98% | 0 | / | 0 |
| Aspen Village | 60 (60) | 100% | 8 | / | 2 |
| Elmwood | 18 (18) | 100% | 2 | / | 1 |
| Parkview | 83 (83) | 100% | 0 | / | 0 |
| Southwinds | 23 (23) | 100% | 23 | / | 23 |
| Portage | 47 (45) | 96% | 47 | / | 8 |
| Meadow Lark | 17 (17) | 100% | 17 | / | 17 |
| Broadview Manor | 20 (19) | 95% | 1 | / | 1 |
| Centennial Village | 48 (48) | 100% | 0 | / | 0 |
| Rainbow House | 40 (40) | 100% | 0 | / | 0 |
| Sunshine Village | 72 (70) | 97% | 7 | / | 7 |
| Franklin School Apt. | 40 (35) | 88% | 6 | / | 0 |
| TOTALS: | 1350 (1273) (4 in rehab) | 94% | 272 | 91 | *117 |

*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 (1470 units)

Section Eight Housing Choice Vouchers as of January 2, 2014: 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 | 425 | 89% |
| Great Falls Housing Authority | 265 | 188 | 71% |
| <hr/> | | | |
| TOTALS: | 740 | 613 | 83% |

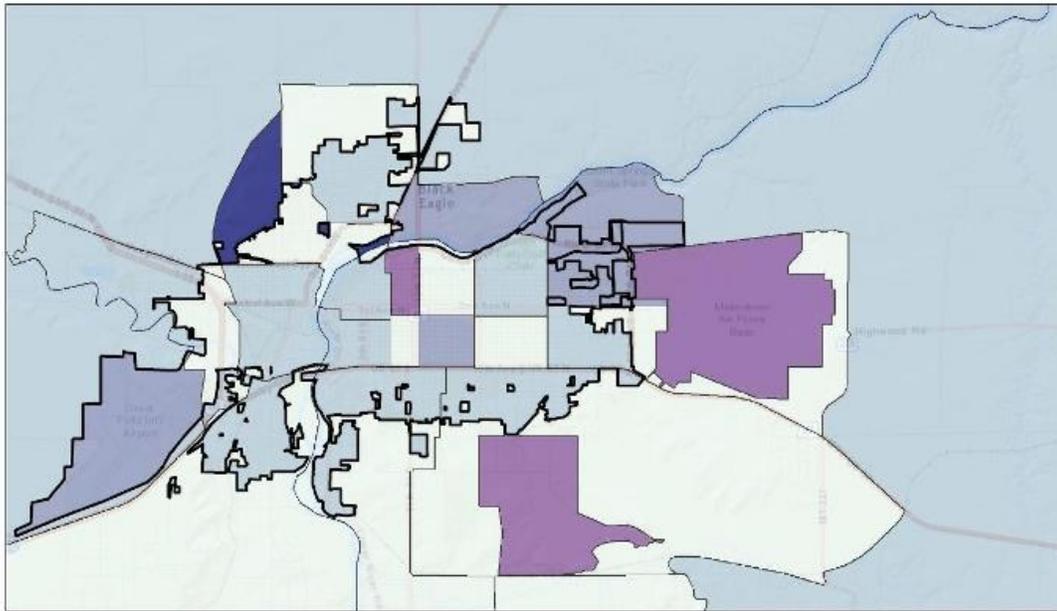
Project Based (Mod Rehab): This program is managed by Opportunities, Inc.

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

APPENDIX D:

Great Falls Racial Concentration: CPD Maps

CPD Maps Hispanic Origin - Consolidated Plan and Continuum of Care 4/13/2015



April 13, 2015

Override 1 HispanicOrigin
B03002EST12_PCT
 <1.35%
 1.35-4.72%
 4.72-9.47%
 9.47-18.57%
 >10.57%

1:132,180
 0 1 2 4 mi
 0 1.75 3.5 7 km
 Source: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., GEBCO, Esri, Swis, METI, Esri, China (Hong Kong), Swis, Thailand, Swis, Mexico, © Esri/ClearMap Solutions, and the GIS User Community

2017 Project List

2017/2018 USE OF FEDERAL GRANT FUNDS COMMUNITY DEVELOPMENT BLOCK GRANT

Affordable Housing

2940-71-742

| | <u>Funding</u> | <u>Project #</u> | <u>Acct #</u> |
|--|----------------|------------------|---------------|
| GREAT FALLS CITY PLANNING & COMMUNITY DEVELOPMENT- CODE ENFORCEMENT Provide services to preserve and enhance public health and safety and reduce slums and blight by enforcing international and city codes related to maintenance of property and buildings. | \$25,097 | CD721820 | 49310 |
| GREAT FALLS CITY PLANNING & COMMUNITY DEVELOPMENT- REVOLVING LOAN FUNDSERVICING Provide servicing for rehab counseling, loan processing, inspections and construction monitoring for all CDBG-funded City revolving loan housing programs for low income people. | \$40,000 | CD721801 | 49310 |
| Great Falls Housing Authority Affordable Housing Rental Rehab. - Purchase two new boilers for Austin Hall, new entry door system and purchase 40 furnaces for Parkdale Amp 1 and Amp 2. | \$40,000 | CD721830 | 47330 |

Public Facility Improvements

2940-71-742

| | <u>Funding</u> | <u>Project #</u> | <u>Acct #</u> |
|--|----------------|------------------|---------------|
| GREAT FALLS CITY PARK & RECREATION - PARK SIDEWALKS Install ADA compliant sidewalks to play structures at multiple City Parks: Rhodes, Elks Riverside | \$14,978 | CD721807 | 49310 |
| GREAT FALLS CITY PARK & RECREATION - COMMUNITY RECREATION CENTER- ADA BATHROOM AND LOCKER ROOM Update the basement bathroom and locker room to be ADA accessible for the community recreation center located at 801 2 nd Avenue North | \$27,177 | CD721808 | 49310 |
| GREAT FALLS CITY PUBLIC WORKS - SIDEWALK AND RAMPS Grant program to provide assistance to low income homeowners to remove and replace hazardous sidewalks within the city limits and replacement of existing intersections with ADA accessible ramps | \$56,672 | CD721809 | 49310 |

O:\PCD\CDBG & HOME\2017-2018\CAPER\2017 Project List.docx

August 30, 2018

| | | | |
|---|----------|----------|-------|
| GREAT FALLS CITY PARK & RECREATION – KRANZ PARK- PARK STRUCTURE | \$45,000 | CD721831 | 49310 |
| Park and Recreation staff will remove the existing play structure and install a new ADA compliant structure to meet the needs of many children in the neighborhood. | | | |
| GREAT FALLS CITY PARK & RECREATION – KRANZ PARK- PAVILION AND AMENITIES | \$28,000 | CD721832 | 49310 |
| Purchase 20'x24' open Pavilion, 4 ADA compliant picnic tables, and 2 concrete garbage receptacles. | | | |
| YWCA | \$19,937 | CD721810 | 47330 |
| Seal and replace the asbestos flooring located on the 2 nd floor of the YWCA | | | |
| QUALITY LIFE CONCEPTS | \$20,877 | CD721811 | 47330 |
| Seal and replace the asbestos flooring of South Park Group Home | | | |
| CENTER FOR MENTAL HEALTH- PASSAGES GROUP HOME | \$10,000 | CD721812 | 47330 |
| Provide external repairs, including exterior paint, for Passages Group Home located at 704 5 th Ave N | | | |

Public Service Activities

2940-71-742

| | <u>Funding</u> | <u>Project #</u> | <u>Acct #</u> |
|---|----------------|------------------|---------------|
| AREA VIII AGENCY ON AGING | \$25,000 | CD721813 | 47330 |
| Purchase food for Meals on Wheels, a citywide home delivery meal program for low/moderate income elderly who are handicapped or unable to prepare meals | | | |
| BOYS & GIRLS CLUB OF CASCADE COUNTY | \$22,500 | CD721814 | 47330 |
| Provide scholarships for summer day camps for children from low income families, programs located at Great Falls Housing Authority (1722 Chowen Springs Loop) and Boys & Girls Club (600 1 st Avenue Southwest) | | | |
| GREAT FALLS CITY PARK & RECREATION— MORONY NATATORIUM & COMMUNITY RECREATION CENTER | \$10,000 | CD721816 | 49310 |
| Provide scholarships for disabled adults to participate in special needs water activities at community indoor pool facility located at 111 12 th Street North; provide scholarships for children from low income families for after school programs and summer camp programs at community center located at 801 2 nd Avenue North | | | |

| | | | |
|---|----------|----------|-------|
| YOUNG PARENTS EDUCATION CENTER | \$10,000 | CD721817 | 47330 |
| Provide day care scholarships for very low to low income teen or young adult parents completing high school or GED programs, programs coaching, and education | | | |

Administration

| | | | |
|---|-----------|--|-------|
| CDBG PROGRAM ADMINISTRATION | \$142,110 | | 41110 |
| General oversight, promotion, financial accountability, monitoring, reporting, and coordination of the CDBG program including activities to further fair housing and the Continuum of Care for Homelessness | | | |

PR26- Financial Summary



Office of Community Planning and Development
 U.S. Department of Housing and Urban Development
 Integrated Disbursement and Information System
 PR26 - CDBG Financial Summary Report
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PART I: SUMMARY OF CDBG RESOURCES

| | |
|---|------------|
| 01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR | 0.00 |
| 02 ENTITLEMENT GRANT | 702,709.00 |
| 03 SURPLUS URBAN RENEWAL | 0.00 |
| 04 SECTION 108 GUARANTEED LOAN FUNDS | 0.00 |
| 05 CURRENT YEAR PROGRAM INCOME | 0.00 |
| 05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE) | 0.00 |
| 06 FUNDS RETURNED TO THE LINE-OF-CREDIT | 0.00 |
| 06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT | 0.00 |
| 07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE | 0.00 |
| 08 TOTAL AVAILABLE (SUM, LINES 01-07) | 702,709.00 |

PART II: SUMMARY OF CDBG EXPENDITURES

| | |
|--|------------|
| 09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION | 457,721.61 |
| 10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT | 0.00 |
| 11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10) | 457,721.61 |
| 12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION | 139,732.87 |
| 13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS | 0.00 |
| 14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES | 0.00 |
| 15 TOTAL EXPENDITURES (SUM, LINES 11-14) | 597,454.48 |
| 16 UNEXPENDED BALANCE (LINE 08 - LINE 15) | 105,254.52 |

PART III: LOWMOD BENEFIT THIS REPORTING PERIOD

| | |
|--|------------|
| 17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS | 0.00 |
| 18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING | 0.00 |
| 19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES | 417,784.49 |
| 20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT | 0.00 |
| 21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20) | 417,784.49 |
| 22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11) | 91.27% |

LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS

| | |
|---|-------------|
| 23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION | PY: PY: PY: |
| 24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION | 0.00 |
| 25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS | 0.00 |
| 26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24) | 0.00% |

PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS

| | |
|---|------------|
| 27 DISBURSED IN IDIS FOR PUBLIC SERVICES | 67,397.75 |
| 28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR | 0.00 |
| 29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR | 0.00 |
| 30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS | 0.00 |
| 31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30) | 67,397.75 |
| 32 ENTITLEMENT GRANT | 702,709.00 |
| 33 PRIOR YEAR PROGRAM INCOME | 93,767.56 |
| 34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP | 0.00 |
| 35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34) | 796,476.56 |
| 36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35) | 8.46% |

PART V: PLANNING AND ADMINISTRATION (PA) CAP

| | |
|--|------------|
| 37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION | 139,732.87 |
| 38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR | 0.00 |
| 39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR | 0.00 |
| 40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS | 0.00 |
| 41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40) | 139,732.87 |
| 42 ENTITLEMENT GRANT | 702,709.00 |
| 43 CURRENT YEAR PROGRAM INCOME | 0.00 |
| 44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP | 0.00 |
| 45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44) | 702,709.00 |
| 46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45) | 19.88% |



LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17

Report returned no data.

LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18

| Plan Year | IDIS Project | IDIS Activity | Activity Name | Matrix Code | National Objective | Drawn Amount |
|--------------|--------------|---------------|---|-------------|--------------------|--------------------|
| 2017 | 26 | 1470 | FY17 Housing Authority Timeliness Project | 14B | LMH | \$39,937.12 |
| | | | | 14B | Matrix Code | \$39,937.12 |
| Total | | | | | | \$39,937.12 |

LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19

| Plan Year | IDIS Project | IDIS Activity | Voucher Number | Activity Name | Matrix Code | National Objective | Drawn Amount |
|-----------|--------------|---------------|----------------|--|-------------|--------------------|---------------------|
| 2016 | 33 | 1452 | 6090336 | C4MH Lewes Windows | 03B | LMC | \$24,590.00 |
| | | | | | 03B | Matrix Code | \$24,590.00 |
| 2015 | 10 | 1405 | 6081707 | P&R Natatorium project | 03E | LMA | \$21,230.00 |
| 2015 | 10 | 1405 | 6090336 | P&R Natatorium project | 03E | LMA | \$13,256.77 |
| 2015 | 10 | 1405 | 6094997 | P&R Natatorium project | 03E | LMA | \$2,588.45 |
| | | | | | 03E | Matrix Code | \$37,075.22 |
| 2016 | 7 | 1425 | 6060533 | 2016 P&R Rhodes Park Structure | 03F | LMA | \$2,123.26 |
| 2016 | 7 | 1425 | 6081707 | 2016 P&R Rhodes Park Structure | 03F | LMA | \$409.50 |
| 2016 | 7 | 1425 | 6090336 | 2016 P&R Rhodes Park Structure | 03F | LMA | \$2,450.00 |
| 2017 | 27 | 1471 | 6147580 | 2017 P&R Kranz Park - Pavilion & Amenities | 03F | LMA | \$27,911.00 |
| 2017 | 28 | 1472 | 6148181 | 2017 P&R Timeliness Kranz Park- Park Structure | 03F | LMA | \$45,000.00 |
| | | | | | 03F | Matrix Code | \$77,893.76 |
| 2016 | 8 | 1424 | 6060533 | GF PW ADA Handicap Ramps | 03K | LMA | \$3,451.08 |
| | | | | | 03K | Matrix Code | \$3,451.08 |
| 2017 | 9 | 1463 | 6145762 | Public Works-Sidewalk/Ramps | 03L | LMA | \$56,672.00 |
| | | | | | 03L | Matrix Code | \$56,672.00 |
| 2017 | 21 | 1462 | 6145460 | Quality Life Concepts- Floor | 03R | LMC | \$1,943.00 |
| | | | | | 03R | Matrix Code | \$1,943.00 |
| 2016 | 19 | 1430 | 6060533 | 2016 Meals on Wheels | 05A | LMC | \$25,000.00 |
| 2017 | 10 | 1466 | 6162288 | Meals in Wheels Program-Food Assistance | 05A | LMC | \$25,000.00 |
| | | | | | 05A | Matrix Code | \$50,000.00 |
| 2016 | 20 | 1432 | 6060533 | 2016 Young Parents Education | 05L | LMC | \$1,137.55 |
| 2017 | 12 | 1467 | 6113051 | Young Parent Education Center Scholarships | 05L | LMC | \$1,315.00 |
| 2017 | 12 | 1467 | 6145460 | Young Parent Education Center Scholarships | 05L | LMC | \$5,964.70 |
| | | | | | 05L | Matrix Code | \$8,417.25 |
| 2017 | 20 | 1469 | 6127222 | P&R Nat and CRC Scholarships | 05M | LMC | \$3,492.00 |
| 2017 | 20 | 1469 | 6131250 | P&R Nat and CRC Scholarships | 05M | LMC | \$2,256.00 |
| 2017 | 20 | 1469 | 6162288 | P&R Nat and CRC Scholarships | 05M | LMC | \$3,208.50 |
| | | | | | 05M | Matrix Code | \$8,956.50 |
| 2016 | 18 | 1428 | 6065833 | P&R Natatorium & Rec Center Scholarships | 05Z | LMC | \$24.00 |
| | | | | | 05Z | Matrix Code | \$24.00 |
| 2016 | 3 | 1433 | 6060533 | Habitat for Humanity 2016 | 12 | LMH | \$28,074.00 |
| 2016 | 12 | 1436 | 6127222 | NHS - Affordable Housing Program | 12 | LMH | \$75,000.00 |
| | | | | | 12 | Matrix Code | \$103,074.00 |
| 2016 | 2 | 1434 | 6060533 | NW GF Revolving Loan Servicing | 14H | LMC | \$7.50 |
| 2016 | 2 | 1434 | 6065833 | NW GF Revolving Loan Servicing | 14H | LMC | \$4,992.80 |
| 2016 | 2 | 1434 | 6081707 | NW GF Revolving Loan Servicing | 14H | LMC | \$774.00 |
| 2016 | 2 | 1434 | 6090336 | NW GF Revolving Loan Servicing | 14H | LMC | \$992.00 |
| 2016 | 2 | 1434 | 6094997 | NW GF Revolving Loan Servicing | 14H | LMC | \$2,115.70 |
| 2016 | 2 | 1434 | 6103173 | NW GF Revolving Loan Servicing | 14H | LMC | \$2,773.00 |
| 2016 | 2 | 1434 | 6113051 | NW GF Revolving Loan Servicing | 14H | LMC | \$1,027.00 |
| 2016 | 2 | 1434 | 6127222 | NW GF Revolving Loan Servicing | 14H | LMC | \$473.00 |



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| Plan Year | IDIS Project | IDIS Activity | Voucher Number | Activity Name | Matrix Code | National Objective | Drawn Amount |
|--------------|--------------|---------------|----------------|--------------------------------|-------------|--------------------|---------------------|
| 2016 | 2 | 1434 | 6145457 | NW GF Revolving Loan Servicing | 14H | LMC | \$2,928.45 |
| 2016 | 2 | 1434 | 6145460 | NW GF Revolving Loan Servicing | 14H | LMC | \$1,278.00 |
| 2016 | 2 | 1434 | 6162288 | NW GF Revolving Loan Servicing | 14H | LMC | \$2,899.20 |
| | | | | | 14H | Matrix Code | \$20,260.65 |
| 2016 | 1 | 1418 | 6060546 | PCD Code Enforcement | 15 | LMA | \$2,184.76 |
| 2016 | 1 | 1418 | 6081707 | PCD Code Enforcement | 15 | LMA | \$4,154.18 |
| 2016 | 1 | 1418 | 6090336 | PCD Code Enforcement | 15 | LMA | \$2,062.70 |
| 2017 | 1 | 1459 | 6103173 | 2017 Code Enforcement | 15 | LMA | \$4,116.84 |
| 2017 | 1 | 1459 | 6113051 | 2017 Code Enforcement | 15 | LMA | \$2,058.42 |
| 2017 | 1 | 1459 | 6127222 | 2017 Code Enforcement | 15 | LMA | \$2,413.48 |
| 2017 | 1 | 1459 | 6131250 | 2017 Code Enforcement | 15 | LMA | \$2,109.16 |
| 2017 | 1 | 1459 | 6145457 | 2017 Code Enforcement | 15 | LMA | \$2,109.17 |
| 2017 | 1 | 1459 | 6155599 | 2017 Code Enforcement | 15 | LMA | \$2,109.16 |
| 2017 | 1 | 1459 | 6162288 | 2017 Code Enforcement | 15 | LMA | \$2,109.16 |
| | | | | | 15 | Matrix Code | \$25,427.03 |
| Total | | | | | | | \$417,784.49 |

LINE 27 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 27

| Plan Year | IDIS Project | IDIS Activity | Voucher Number | Activity Name | Matrix Code | National Objective | Drawn Amount |
|--------------|--------------|---------------|----------------|--|-------------|--------------------|--------------------|
| 2016 | 19 | 1430 | 6060533 | 2016 Meals on Wheels | 05A | LMC | \$25,000.00 |
| 2017 | 10 | 1466 | 6162288 | Meals in Wheels Program-Food Assistance | 05A | LMC | \$25,000.00 |
| | | | | | 05A | Matrix Code | \$50,000.00 |
| 2016 | 20 | 1432 | 6060533 | 2016 Young Parents Education | 05L | LMC | \$1,137.55 |
| 2017 | 12 | 1467 | 6113051 | Young Parent Education Center Scholarships | 05L | LMC | \$1,315.00 |
| 2017 | 12 | 1467 | 6145460 | Young Parent Education Center Scholarships | 05L | LMC | \$5,984.70 |
| | | | | | 05L | Matrix Code | \$8,417.25 |
| 2017 | 20 | 1469 | 6127222 | P&R Nat and CRC Scholarships | 05M | LMC | \$3,492.00 |
| 2017 | 20 | 1469 | 6131250 | P&R Nat and CRC Scholarships | 05M | LMC | \$2,256.00 |
| 2017 | 20 | 1469 | 6162288 | P&R Nat and CRC Scholarships | 05M | LMC | \$3,208.50 |
| | | | | | 05M | Matrix Code | \$8,956.50 |
| 2016 | 18 | 1428 | 6065833 | P&R Natatorium & Rec Center Scholarships | 05Z | LMC | \$24.00 |
| | | | | | 05Z | Matrix Code | \$24.00 |
| Total | | | | | | | \$67,397.75 |

LINE 37 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 37

| Plan Year | IDIS Project | IDIS Activity | Voucher Number | Activity Name | Matrix Code | National Objective | Drawn Amount |
|--------------|--------------|---------------|----------------|--------------------------|-------------|--------------------|---------------------|
| 2016 | 14 | 1416 | 6060546 | 2016 CDBG Administration | 21A | | \$11,112.36 |
| 2016 | 14 | 1416 | 6065833 | 2016 CDBG Administration | 21A | | \$43.32 |
| 2016 | 14 | 1416 | 6081707 | 2016 CDBG Administration | 21A | | \$26,552.67 |
| 2017 | 8 | 1458 | 6103173 | 2017 CDBG Administration | 21A | | \$29,835.05 |
| 2017 | 8 | 1458 | 6113051 | 2017 CDBG Administration | 21A | | \$9,038.15 |
| 2017 | 8 | 1458 | 6127222 | 2017 CDBG Administration | 21A | | \$16,523.75 |
| 2017 | 8 | 1458 | 6131250 | 2017 CDBG Administration | 21A | | \$12,416.03 |
| 2017 | 8 | 1458 | 6145457 | 2017 CDBG Administration | 21A | | \$10,105.76 |
| 2017 | 8 | 1458 | 6155599 | 2017 CDBG Administration | 21A | | \$9,655.30 |
| 2017 | 8 | 1458 | 6162288 | 2017 CDBG Administration | 21A | | \$14,450.48 |
| | | | | | 21A | Matrix Code | \$139,732.87 |
| Total | | | | | | | \$139,732.87 |

HOME Match, Section 3, MBE, HOME Annual Performance Report

Annual Performance Report HOME Program

U.S. Department of Housing
and Urban Development
Office of Community Planning
and Development

OMB Approval No. 2506-0171
(exp. 8/31/2009)

Public reporting burden for this collection of information is estimated to average 2.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

The HOME statute imposes a significant number of data collection and reporting requirements. This includes information on assisted properties, on the owners or tenants of the properties, and on other programmatic areas. The information will be used: 1) to assist HOME participants in managing their programs; 2) to track performance of participants in meeting fund commitment and expenditure deadlines; 3) to permit HUD to determine whether each participant meets the HOME statutory income targeting and affordability requirements; and 4) to permit HUD to determine compliance with other statutory and regulatory program requirements. This data collection is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act or related authorities. Access to Federal grant funds is contingent on the reporting of certain project-specific data elements. Records of information collected will be maintained by the recipients of the assistance. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

This form is intended to collect numeric data to be aggregated nationally as a complement to data collected through the Cash and Management Information (C/M) System. Participants should enter the reporting period in the first block. The reporting period is October 1 to September 30. Instructions are included for each section if further explanation is needed.

| | | | |
|---|--|----------------------|---|
| Submit this form on or before December 31. Send one copy to the appropriate HUD Field Office and one copy to: HOME Program, Rm 7176, 451 7th Street, S.W., Washington D.C. 20410 | This report is for period (mm/dd/yyyy) Starting 07/01/2017 | Ending 06/30/2018 | Date Submitted (mm/dd/yyyy) 09/30/2018 |
|---|--|----------------------|---|

Part I Participant Identification

| | | | |
|--|---|----------------|---------------------------|
| 1. Participant Number M-17-MC-30-0218 | 2. Participant Name City of Great Falls, Montana | | |
| 3. Name of Person completing this report Maria Porter | 4. Phone Number (include Area Code) 406-455-8407 | | |
| 5. Address 2 Park Drive S., P.O. Box 5021 | 6. City Great Falls | 7. State MT | 8. Zip Code 59401-4006 |

Part II Program Income

Enter the following program income amounts for the reporting period: in block 1, enter the balance on hand at the beginning; in block 2, enter the amount generated; in block 3, enter the amount expended; and in block 4, enter the amount for Tenant-Based rental Assistance.

| | | | | |
|--|--|--|---|--|
| 1. Balance on hand at Beginning of Reporting Period 294,398 | 2. Amount received during Reporting Period 56,638 | 3. Total amount expended during Reporting Period 70,550 | 4. Amount expended for Tenant-Based Rental Assistance | 5. Balance on hand at end of Reporting Period (1 + 2 - 3) = 5 280,486 |
|--|--|--|---|--|

Part III Minority Business Enterprises (MBE) and Women Business Enterprises (WBE)

In the table below, indicate the number and dollar value of contracts for HOME projects completed during the reporting period.

| | a. Total | Minority Business Enterprises (MBE) | | | f. White Non-Hispanic |
|-------------------------|----------|--------------------------------------|------------------------------|-----------------------|-----------------------|
| | | b. Alaskan Native or American Indian | c. Asian or Pacific Islander | d. Black Non-Hispanic | |
| A. Contracts | | | | | |
| 1. Number | 0 | | | | |
| 2. Dollar Amount | | | | | |
| B. Sub-Contracts | | | | | |
| 1. Number | 0 | | | | |
| 2. Dollar Amount | | | | | |
| | a. Total | b. Women Business Enterprises (WBE) | c. Male | | |
| C. Contracts | | | | | |
| 1. Number | 0 | | | | |
| 2. Dollar Amount | | | | | |
| D. Sub-Contracts | | | | | |
| 1. Number | | | | | |
| 2. Dollar Amounts | | | | | |

Part IV Minority Owners of Rental Property

In the table below, indicate the number of HOME assisted rental property owners and the total dollar amount of HOME funds in these rental properties assisted during the reporting period.

| | a. Total | Minority Property Owners | | | f. White Non-Hispanic |
|------------------|----------|--------------------------------------|------------------------------|-----------------------|-----------------------|
| | | b. Alaskan Native or American Indian | c. Asian or Pacific Islander | d. Black Non-Hispanic | |
| 1. Number | 0 | | | | |
| 2. Dollar Amount | | | | | |

Part V 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. The data provided should reflect only displacements and acquisitions occurring during the reporting period.

| | a. Number | b. Cost |
|--|-----------|---------|
| 1. Parcels Acquired | 0 | |
| 2. Businesses Displaced | 0 | |
| 3. Nonprofit Organizations Displaced | 0 | |
| 4. Households Temporarily Relocated, not Displaced | 0 | |

| Households Displaced | a. Total | Minority Business Enterprises (MBE) | | | f. White Non-Hispanic |
|----------------------------------|----------|--------------------------------------|------------------------------|-----------------------|-----------------------|
| | | b. Alaskan Native or American Indian | c. Asian or Pacific Islander | d. Black Non-Hispanic | |
| 5. Households Displaced - Number | 0 | | | | |
| 6. Households Displaced - Cost | | | | | |



Section 3 Summary Report

Economic Opportunities for Low- and Very Low-Income Persons

U.S. Department of Housing and Urban Development

Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0043
(exp. 11/30/2018)

| Disbursement Agency |
|--|
| City of Great Falls, Montana |
| 2 Park Drive S., Great Falls, MT 59403 |
| 81-6001269 |

| Reporting Entity |
|--|
| City of Great Falls, Montana |
| 2 Park Drive S., Great Falls, MT 59403 |

| | |
|------------------------------|--------------|
| Dollar Amount | \$597,454.48 |
| Contact Person | Maria Porter |
| Date Report Submitted | 09/06/2018 |

| Reporting Period | | Program Area Code | Program Area Name |
|-------------------------|-----------|--------------------------|------------------------------|
| From | To | | |
| 7/1/17 | 6/30/18 | CDB1 | Community Devel Block Grants |

Part I: Employment and Training

| Job Category | Number of New Hires | Number of New Hires that Are Sec. 3 Residents | Aggregate Number of Staff Hours Worked | Total Staff Hours for Section 3 Employees | Number of Section 3 Trainees |
|-------------------------------------|---------------------|---|--|---|------------------------------|
| Technical (Bookkeeping, IT, etc) | 1 | 0 | 0 | 0 | 0 |

| | |
|--|------|
| Total New Hires | 1 |
| Section 3 New Hires | 0 |
| Percent Section 3 New Hires | 0.0% |
| Total Section 3 Trainees | 0 |
| The minimum numerical goal for Section 3 new hires is 30%. | |

Part II: Contracts Awarded

| Construction Contracts | |
|--|-------------|
| Total dollar amount of construction contracts awarded | \$90,770.00 |
| Total dollar amount of contracts awarded to Section 3 businesses | \$0.00 |
| Percentage of the total dollar amount that was awarded to Section 3 businesses | 0.0% |
| Total number of Section 3 businesses receiving construction contracts | 0 |
| The minimum numerical goal for Section 3 construction opportunities is 10%. | |

| Non-Construction Contracts | |
|---|--------------|
| Total dollar amount of all non-construction contracts awarded | \$179,736.00 |
| Total dollar amount of non-construction contracts awarded to Section 3 businesses | \$0.00 |
| Percentage of the total dollar amount that was awarded to Section 3 businesses | 0.0% |
| Total number of Section 3 businesses receiving non-construction contracts | 0 |
| The minimum numerical goal for Section 3 non-construction opportunities is 3%. | |

Part III: Summary

| | |
|---|--|
| Indicate the efforts made to direct the employment and other economic opportunities generated by HUD financial assistance for housing and community development programs, to the greatest extent feasible, toward low- and very low-income persons, particularly those who are recipients of government assistance for housing. | |
| Yes | Attempted to recruit low-income residents through: local advertising media, signs prominently displayed at the project site, contacts with community organizations and public or private agencies operating within the metropolitan area (or nonmetropolitan county) in which the Section 3 covered program or project is located, or similar methods. |
| Yes | Participated in a HUD program or other program which promotes the training or employment of Section 3 residents. |
| Yes | Participated in a HUD program or other program which promotes the award of contracts to business concerns which meet the definition of Section 3 business concerns. |
| No | Coordinated with Youthbuild Programs administered in the metropolitan area in which the Section 3 covered project is located. |
| No | Other; describe below. |
| There are no Section 3 registered businesses within our Entitlement City area (Great Falls), but we share Section 3 registry information with all of our contractors and encourage our subrecipients to share Section 3 registry information with all of their contractors. | |

Public reporting burden for this collection of information is estimated to average 45 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

The HOME statute imposes a significant number of data collection and reporting requirements. This includes information on assisted properties, on the owners or tenants of the properties, and on other programmatic areas. The information will be used: 1) to assist HOME participants in managing their programs; 2) to track performance of participants in meeting fund commitment and expenditure deadlines; 3) to permit HUD to determine whether each participant meets the HOME statutory income targeting and affordability requirements; and 4) to permit HUD to determine compliance with other statutory and regulatory program requirements. This data collection is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act or related authorities. Access to Federal grant funds is contingent on the reporting of certain project-specific data elements. Records of information collected will be maintained by the recipients of the assistance. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

Instructions for the HOME Match Report

Applicability:

The HOME Match Report is part of the HOME APR and must be filled out by every participating jurisdiction that incurred a match liability. Match liability occurs when FY 1993 funds (or subsequent year funds) are drawn down from the U.S. Treasury for HOME projects. A Participating Jurisdiction (PJ) may start counting match contributions as of the beginning of Federal Fiscal Year 1993 (October 1, 1992). A jurisdiction not required to submit this report, either because it did not incur any match or because it had a full match reduction, may submit a HOME Match Report if it wishes. The match would count as excess match that is carried over to subsequent years. The match reported on this form must have been contributed during the reporting period (between October 1 and September 30).

Timing:

This form is to be submitted as part of the HOME APR on or before December 31. The original is sent to the HUD Field Office. One copy is sent to the

Office of Affordable Housing Programs, CGHF
Room 7176, HUD, 451 7th Street, S.W.
Washington, D.C. 20410.

The participating jurisdiction also keeps a copy.

Instructions for Part II:

1. **Excess match from prior Federal fiscal year:** Excess match carried over from prior Federal fiscal year.
2. **Match contributed during current Federal fiscal year:** The total amount of match contributions for all projects listed under Part III in column 9 for the Federal fiscal year.

3. **Total match available for current Federal fiscal year:** The sum of excess match carried over from the prior Federal fiscal year (Part II, line 1) and the total match contribution for the current Federal fiscal year (Part II, line 2). This sum is the total match available for the Federal fiscal year.

4. **Match liability for current Federal fiscal year:** The amount of match liability is available from HUD and is provided periodically to PJs. The match must be provided in the current year. The amount of match that must be provided is based on the amount of HOME funds drawn from the U.S. Treasury for HOME projects. The amount of match required equals 25% of the amount drawn down for HOME projects during the Federal fiscal year. Excess match may be carried over and used to meet match liability for subsequent years (see Part II line 5). Funds drawn down for administrative costs, CHDO operating expenses, and CHDO capacity building do not have to be matched. Funds drawn down for CHDO seed money and/or technical assistance loans do not have to be matched if the project does not go forward. A jurisdiction is allowed to get a partial reduction (50%) of match if it meets one of two statutory distress criteria, indicating "fiscal distress," or else a full reduction (100%) of match if it meets both criteria, indicating "severe fiscal distress." The two criteria are poverty rate (must be equal to or greater than 125% of the average national family poverty rate to qualify for a reduction) and per capita income (must be less than 75% of the national average per capita income to qualify for a reduction). In addition, a jurisdiction can get a full reduction if it is declared a disaster area under the Robert T. Stafford Disaster Relief and Emergency Act.

5. **Excess match carried over to next Federal fiscal year:** The total match available for the current Federal fiscal year (Part II, line 3) minus the match liability for the current Federal fiscal year (Part II, line 4). Excess match may be carried over and applied to future HOME project match liability.

Instructions for Part III:

1. **Project No. or Other ID:** "Project number" is assigned by the C/MI System when the PJ makes a project setup call. These projects involve at least some Treasury funds. If the HOME project does not involve Treasury funds, it must be identified with "other ID" as follows: the fiscal year (last two digits only), followed by a number (starting from "01" for the first non-Treasury-funded project of the fiscal year), and then at least one of the following abbreviations: "SF" for project using shortfall funds, "PI" for projects using program income, and "NON" for non-HOME-assisted affordable housing. Example: 93.01.SF, 93.02.PI, 93.03.NON, etc.

Shortfall funds are non-HOME funds used to make up the difference between the participation threshold and the amount of HOME funds allocated to the PJ; the participation threshold requirement applies only in the PJ's first year of eligibility. [§92.102]

Program income (also called "repayment income") is any return on the investment of HOME funds. This income must be deposited in the jurisdiction's HOME account to be used for HOME projects. [§92.503(b)]

- Non-HOME-assisted affordable housing is investment in housing not assisted by HOME funds that would qualify as "affordable housing" under the HOME Program definitions. "NON" funds must be contributed to a specific project; it is not sufficient to make a contribution to an entity engaged in developing affordable housing. [§92.219(b)]
2. **Date of Contribution:** Enter the date of contribution. Multiple entries may be made on a single line as long as the contributions were made during the current fiscal year. In such cases, if the contributions were made at different dates during the year, enter the date of the last contribution.
 3. **Cash:** Cash contributions from non-Federal resources. This means the funds are contributed permanently to the HOME Program regardless of the form of investment the jurisdiction provides to a project. Therefore all repayment, interest, or other return on investment of the contribution must be deposited in the PJ's HOME account to be used for HOME projects. The PJ, non-Federal public entities (State/local governments), private entities, and individuals can make contributions. The grant equivalent of a below-market interest rate loan to the project is eligible when the loan is not repayable to the PJ's HOME account. [§92.220(a)(1)] In addition, a cash contribution can count as match if it is used for eligible costs defined under §92.206 (except administrative costs and CHDO operating expenses) or under §92.209, or for the following non-eligible costs: the value of non-Federal funds used to remove and relocate ECHO units to accommodate eligible tenants, a project reserve account for replacements, a project reserve account for unanticipated increases in operating costs, operating subsidies, or costs relating to the portion of a mixed-income or mixed-use project not related to the affordable housing units. [§92.219(c)]
 4. **Foregone Taxes, Fees, Charges:** Taxes, fees, and charges that are normally and customarily charged but have been waived, foregone, or deferred in a manner that achieves affordability of the HOME-assisted housing. This includes State tax credits for low-income housing development. The amount of real estate taxes may be based on the post-improvement property value. For those taxes, fees, or charges given for future years, the value is the present discounted cash value. [§92.220(a)(2)]
 5. **Appraised Land/Real Property:** The appraised value, before the HOME assistance is provided and minus any debt burden, lien, or other encumbrance, of land or other real property, not acquired with Federal resources. The appraisal must be made by an independent, certified appraiser. [§92.220(a)(3)]
 6. **Required Infrastructure:** The cost of investment, not made with Federal resources, in on-site and off-site infrastructure directly required for HOME-assisted affordable housing. The infrastructure must have been completed no earlier than 12 months before HOME funds were committed. [§92.220(a)(4)]
 7. **Site preparation, Construction materials, Donated labor:** The reasonable value of any site-preparation and construction materials, not acquired with Federal resources, and any donated or voluntary labor (see §92.354(b)) in connection with the site-preparation for, or construction or rehabilitation of, affordable housing. The value of site-preparation and construction materials is determined in accordance with the PJ's cost estimate procedures. The value of donated or voluntary labor is determined by a single rate ("labor rate") to be published annually in the Notice Of Funding Availability (NOFA) for the HOME Program. [§92.220(6)]
 8. **Bond Financing:** Multifamily and single-family project bond financing must be validly issued by a State or local government (or an agency, instrumentality, or political subdivision thereof). 50% of a loan from bond proceeds made to a multifamily affordable housing project owner can count as match. 25% of a loan from bond proceeds made to a single-family affordable housing project owner can count as match. Loans from all bond proceeds, including excess bond match from prior years, may not exceed 25% of a PJ's total annual match contribution. [§92.220(a)(5)] The amount in excess of the 25% cap for bonds may carry over, and the excess will count as part of the statutory limit of up to 25% per year. Requirements regarding bond financing as an eligible source of match will be available upon publication of the implementing regulation early in FY 1994.
 9. **Total Match:** Total of items 3 through 8. This is the total match contribution for each project identified in item 1.
- Ineligible forms of match include:**
1. Contributions made with or derived from Federal resources e.g. CDBG funds [§92.220(b)(1)]
 2. Interest rate subsidy attributable to the Federal tax-exemption on financing or the value attributable to Federal tax credits [§92.220(b)(2)]
 3. Contributions from builders, contractors or investors, including owner equity, involved with HOME-assisted projects. [§92.220(b)(3)]
 4. Sweat equity [§92.220(b)(4)]
 5. Contributions from applicants/recipients of HOME assistance [§92.220(b)(5)]
 6. Fees/charges that are associated with the HOME Program only, rather than normally and customarily charged on all transactions or projects [§92.220(a)(2)]
 7. Administrative costs



Section 3 Summary Report

Economic Opportunities for Low- and Very Low-Income Persons

U.S. Department of Housing and Urban Development

Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0043
(exp. 11/30/2018)

| Disbursement Agency |
|--|
| City of Great Falls, Montana |
| 2 Park Drive S., Great Falls, MT 59403 |
| 81-6001269 |

| Reporting Entity |
|--|
| City of Great Falls, Montana |
| 2 Park Drive S., Great Falls, MT 59403 |

| | |
|------------------------|--------------|
| Dollar Amount: | \$4,497.31 |
| Contact Person: | Maria Porter |
| Date Report Submitted: | 09/06/2018 |

| Reporting Period | | Program Area Code | Program Area Name |
|-------------------------|-----------|--------------------------|--------------------------|
| From | To | | |
| 7/1/17 | 6/30/18 | HOME | HOME Program |

The expenditure of these funds did not result in any covered contracts or new hires during the 12-month period selected.

Contract and Subcontract Activity

U.S. Department of Housing and Urban Development

OMB Approval No. 2577-0088

OMB Approval No. 2502-0385

Public reporting burden for this collection of information is estimated to average 5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The information is voluntary. HUD may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB Control Number.

Executive Orders dated July 14, 1983, direct that the Minority Business Development Plans shall be developed by each Federal Agency and these annual plans shall establish minority business development objectives. The information is used by HUD to monitor and evaluate MBE activities against the total program activity and the designated minority business enterprise (MBE) goals. The Department requires the information to provide guidance and oversight for programs for the development of minority business enterprise concerning Minority Business Development. If the information is not collected HUD would not be able to establish meaningful MBE goals nor evaluate MBE performance against these goals.

Privacy Act Notice - The United States Department of Housing and Urban Development, Federal Housing Administration, is authorized to solicit the information requested in this form by virtue of Title 12, United States Code, Section 1701 et seq., and regulation. It will not be disclosed or released outside the United States Department of Housing and Urban Development without your consent, except as required or permitted by Law.

1. Grantee/Project Owner/Developer/Sponsor/Builder/Agency
City of Great Falls

| | |
|-----------|------------------------------------|
| Check if: | 2. Location (City, State Zip Code) |
| PH | Great Falls, MT 59403 |
| BH | |
| CPD | |
| Housing | |

| | | | | |
|--|--|--|---|--|
| 3a. Name of Contact Person Maria Porter | 3b. Phone Number (Including Area Code) 406-455-8407 | 4. Reporting Period <input checked="" type="checkbox"/> April 1, 2018 - September 30, 2018 (Same Annual) | 5. Program Code (Not applicable for CPD programs) See explanation of Codes at bottom of Page Use a separate sheet for each program code. | 6. Date Submitted to Field Office 9/30/2018 |
|--|--|--|---|--|

| Grant/Project Number or HUD Case Number or other identification of property, subdivision, dwelling unit, etc. 7a. | Amount of Contract or Subcontract 7b. | Type of Trade Code (See below) 7c. | Contractor or Subcontractor Business Race/Ethnic (See below) 7d. | Woman Owned Business (Yes or No) 7e. | Prime Contractor Identification (IC) Number 7f. | Sec. 3 7g. | Subcontractor Identification (ID) Number 7h. | Sec. 3 7i. | Contractor/Subcontractor Name and Address 7j. | | | | |
|---|---------------------------------------|------------------------------------|--|--------------------------------------|---|------------|--|------------|---|---------------------|-------------|-------|-------|
| | | | | | | | | | Name | Street | City | State | Zip |
| Revolving Loan Fund-CD751801 | \$7,389.00 | 3 | 1 | No | 33-0433246 | | | | Apole Valley | 2103 Vaughn Road | Great Falls | MT | 59404 |
| B-17-MC-30-0002 (CDBG/QLC Floor) | \$17,888.00 | 2 | | No | 84-8660932 | | | | Environmental Contractors LLC | 2701 Overland Ave | Billings | MT | 59102 |
| B-17-MC-30-0002 (CDBG/PW Sidewalks) | \$56,567.00 | 2 | 1 | No | 81-0458647 | | | | David W Kuglin Construction | P.O. Box 941 | Black Eagle | MT | 59414 |
| B-17-MC-30-0002 (CDBG/PR CRC Bathroom) | \$7,150.00 | 9 | 1 | No | 06-3731137 | | | | L'Heureux Page Werner, PC | 15 5th Street South | Great Falls | MT | 59401 |
| B-17-MC-30-0002 (CDBG/PR Park Sidewalk) | \$14,753.48 | 2 | | No | 03-6570075 | | | | Gregoire Construction | 710 49th St S | Great Falls | MT | 59405 |

| | | |
|--|---|--|
| 7c: Type of Trade Codes: Housing/Public Housing: 1 = New Construction 2 = Substantial Rehab. 3 = Repair 4 = Service 5 = Project Manag. 6 = Professional 7 = Tenant Services 8 = Education/Training 9 = Arch./Engng. Appraisal 0 = Other | 7d: Racial/Ethnic Codes: 1 = White Americans 2 = Black Americans 3 = Native Americans 4 = Hispanic Americans 5 = Asian/Pacific Americans 6 = Hispanic Jews | 5: Program Codes (Complete for Housing and Public and Indian Housing programs only): 1 = All Insured, including Section8 2 = Rentable Subsidy 3 = Section 8 Nonrental, Non-HPDA 4 = Insured (Management) 5 = Section 202 6 = HUD-HOME (Management) 7 = Public/Private Housing 8 = Section 811 |
|--|---|--|