

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, 2016, through June 30, 2017. In this reporting period the City of Great Falls received a total of \$896,135 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	21	140.00%	4	12	300.00%
Economic Development	Non-Housing Community Development Economic Development	CDBG: \$	Businesses assisted	Businesses Assisted	10	3	30.00%			
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	375	187.50%			
Homeownership	Affordable Housing	CDBG: \$ / HOME: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	2				
Homeownership	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	0	11				

Homeownership	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	50	14	28.00%	4	10	250.00%
Homeownership	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	75	17	22.67%			
Homeownership	Affordable Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	25	56	224.00%			
Homeownership	Affordable Housing	CDBG: \$ / HOME: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Homeownership	Affordable Housing	CDBG: \$ / HOME: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	75	70	93.33%	0	58	
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	17		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	257	36.71%			
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	21177	1,411.80%	4624	20050	433.61%
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	39	39.00%			

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	4723	6365	134.77%	491	1802	367.01%
Transitional Housing	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5200	16	0.31%			
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, 10% for public services, 10% 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	1,513	0
Black or African American	17	0
Asian	13	0
American Indian or American Native	47	0
Native Hawaiian or Other Pacific Islander	4	0
Total	1,594	0
Hispanic	49	0
Not Hispanic	1,545	0

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

Narrative

The City does not have any data for HOME due to no new HOME Projects for FY16. The data from prior year HOME projects were captured in their corresponding CAPER's.

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 Caucasion 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	710,552	570,654
HOME	HOME	185,583	17,439
HOPWA	HOPWA		
ESG	ESG		
General Fund	General Fund		
Other	Other		

Table 3 - Resources Made Available

Narrative

For Fiscal Year 2016/2017, the City received a total of \$896,135 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, new construction of single family houses, 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 2016/2017 Annual Action Plan to undertake these goals.

Identify the geographic distribution and location of investments

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

Table 4 – Identify the geographic distribution and location of investments

Narrative

All activities funded by the City are required to take place within the city limits. Most of the activities funded are located in LMI census tracts showing 51% or more LMI populations. Some of the activities that the City undertakes a 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 is received by the Community Development Council. The Council reviews 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	2,007,053
2. Match contributed during current Federal fiscal year	1,646,250
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	3,653,303
4. Match liability for current Federal fiscal year	96,258
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	3,557,045

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
IDIS 1385	01/10/2017	436,250	0	0	0	1,210,000	0	1,646,250

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	365,109	174,350	0	190,759

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	0
Number of Non-Homeless households to be provided affordable housing units	122	76
Number of Special-Needs households to be provided affordable housing units	0	0
Total	132	76

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	12	10
Number of households supported through Rehab of Existing Units	12	66
Number of households supported through Acquisition of Existing Units	0	0
Total	24	76

Table 12 – Number of Households Supported

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

With the use of CDBG and HOME funds the City was able to assist in the land acquisition and construction of ten new housing units that were sold to low to moderate income households. The City was also able to assist in the rehabilitation of sixty six units, including single family homes and rental units that are occupied by low to moderate income households. This exceeded the City's estimated one-year goal.

In the long run the City hopes to increase the number of new construction and rehabilitated home 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 future of building or rehabilitating of units is always a flexible barrier. The amount of funding prioritized to these types of activities will have to increase in the future to allow for increased costs. Future Annual Action plans will have to be taken into considerate of the goals set forth in the Consolidated Plan and make sure that appropriate finding is allocated so that goals are met.

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	3	0
Low-income	10	0
Moderate-income	0	0
Total	13	0

Table 13 – Number of Households Served

Narrative Information

City of Great Falls

The City administered 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.

Neighborhood Housing Services, Inc.

The main goal of NHS is to provide safe, affordable housing for low income families. Primary services included providing low interest loans and construction assistance to neighborhood low income homeowners for rehabilitation of their homes; providing down payment and closing cost assistance and foreclosure prevention loans; purchasing and rehabilitating houses to be sold to low and moderate income households; constructing single family homes that are affordable for LMI households; providing homebuyer education programs; and providing administrative assistance to Montana communities for the development of affordable housing programs.

Other activities NHS accomplished included: incorporated Energy Star considerations into new construction and rehabilitation projects; partnered with Rural Dynamics, Inc., and (RDI) to move low income families into first-time homeownership; collaborated with RDI to provide homebuyer services including financial literacy training for low income people; provided one deferred loan for home repairs to elderly and low income homeowners who do not have mortgages on their homes; collaborated with the Housing Authority, Habitat for Humanity and RDI to coordinate housing services for low income families; did outreach with many different agencies within the city; and developed and implemented new home loan improvement program. None of the beneficiaries receiving housing assistance reported they were experiencing homelessness or involuntarily displaced.

The City addressed "worst case needs" and progress in meeting the needs of persons with disabilities by providing a Rehabilitation Specialist to facilitate rehab counseling and loan processing to individuals who need financial assistance and guidance. The city also provided funding and worked with NHS and Habitat for Humanity to provide affordable housing through down payment assistance, new construction, and other activities addressing neighborhood revitalization. In addition to the financial support, the city provides code enforcement specialist to enhance public health and safety, while reducing slums and blight. All of these elements address "worst case needs" by providing support through financial assistance, programming, and case management.

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 helps low-income individuals and families avoid becoming homeless, including 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) by partnering with various agencies within the community to provide resources and opportunities.

The City is actively engaged in the local Continuum of Care group and leads the facilitation of Case

Conferencing which addresses the names from the Coordinated Entry System. The Case Conferencing Meetings allows homeless individuals to receive full case management from multiple nonprofits that offer services. The case management at these meetings gives individuals and families a better chance at avoiding becoming homeless.

Preventative Efforts and Services Provided

Opportunities Inc is a major partner that provides rental assistance to help individuals avoid homelessness on a temporary basis. Opportunities Inc collaborated with Center for Mental Health, who received \$24,640/CDBG in FY16 from the City, to provide services for the mentally ill homeless through referral for emergency services. 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, who received \$18,819/CDBG in FY16 from the City, provided 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 at the Blue Thunder Lodge. 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. Supportive services for the homeless included; assistance with case management, adult therapeutic aide services, emergency housing, food, clothing, household items and emergency medication funds. CMH coordinated with Opportunities, Inc., Office of Public Assistance, Great Falls Rescue Mission, Salvation Army, St. Vincent DePaul and other social service agencies to provide assistance with food, clothing, housing and payee services. CMH operated Center West, a transitional living facility for adults with severe mental illness which currently has a capacity of eight units. Housing, supportive services including 24 hour on-site staff, meals, case management, job placement, and wellness recovery services were provided. 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 2016/2017 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.

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 \$80,000 in funds to the Housing Authority in fiscal year 2016/2017 to assist in replacing the fire alarm system at Austin Hall. The activity allowed the facility to comply with code and ensure the building was not shut down.

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 provided the City building official with the HUD Accessibility Guidelines *Seven Technical Requirements* pamphlets, a summary listing of the Fair Housing Act accessibility requirements and a summary of the Section 504 of the Rehabilitation Act of 1973 accessibility requirements. The City building official was requested to provide this information to any individual who requested an architectural and engineering plan review through the City Planning and Community Development Department. These requirements apply only to multi-family construction and federal funded projects for Section 504.

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 \$30,000 to Great Falls Development Authority to undertake a household labor survey that will provide data to identify the underserved needs. 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. The agency served a total of approximately 20,000 people in all programs over the past year. In the past year the CCHD had to limit free HIV testing and free condoms to individuals who fall in specific risk categories and they lost the Early HeadStart Home Visitation contract.

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. In the past year one cdbg project primary focus was to address lead-based paint abatement.

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 povert. 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 Great Falls Housing Task Force met regularly to collect and share statistics on housing affordability, availability and accessibility; to discuss and project trends within the Great Falls housing market; and to promote fair housing activities. Discussion has begun in regards to creating a city/county wide directory that would be made available to all agencies both in the city and the county. This directory would include the contact information and services that agencies provide so that the information would be readily available to everyone. This would make it easier for agencies to assist individuals and direct them as needed.

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. Verbiage in the City zoning code defines family and restricts the number of non-related individuals who can live together. However, this code has not historically been enforced and the City is in the process of changing the code.

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 pursued diverse avenues to affirmatively further fair housing through the following activities. The City has used CDBG administrative funds to partially fund a fair housing specialist position since 1995.

The City fair housing specialist assisted with the City of Great Falls Analysis of Impediments to Fair Housing Choice 2015—2020 (AI) in April 2015. Five impediments, as well as strategies to address those impediments and activities accomplished in the past year, were identified.

All activities the City fair housing specialist undertook throughout the year focused in some way on addressing the six identified impediments of the position:

- Impediment # 4 identified the lack of quality rental housing for low income people. CDBG activity funds were used to fund two housing programs which addressed this impediment through providing funds to provide more quality rental housing for low income people. CDBG funds were used in the Rental Improvement Loan Program and in the Water & Sewer Loan Program.
- Impediment # 5 identified the lack of subsidized housing for elderly and disabled that is fully accessible. The City administers a Deferred Payment Loan that utilized funds to help people make improvements to their homes;

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; provided facilitation to prevent evictions; assisted tenants and landlords with landlord-tenant issues; and actively participated as member of the Great Falls Housing Task Force, Local Individuals Network for Customized Services, and Missouri River Workforce System Community Management Team.

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.

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.

Affordable housing projects are monitored via desk review and/or site-visits, including inspections, every two years. On-site visits include property standards completion and ongoing compliance inspections, tenant file review, household income verification, etc. City staff also conducts annual 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. This fiscal year, NeighborWorks Great Falls was certified as the City's only active CHDOs.

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, staff has identified reasons to change the process in allocating funding to address the current programs identified in the Consolidated plan. Staff is developing 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 biennially. One project was monitored on-site, ASI Voyageur Apartments Project, no findings were identified.

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 each individual activity that NHS undertook with HOME funds by site visits and by requiring NHS to submit quarterly reports on all activities. 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 used \$174,350 in program income this fiscal year and has a current balance of \$190,759. NeighborWorks solely used HOME Program Income as down payment assistance for purchase of homes to low to moderate income individuals.

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 NH, 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.