

## Section V: Strategic Plan

### SP-05 Overview

#### Strategic Plan Overview

The Community Development Division's strategies for addressing community needs are included herein. As per findings and recommendations from the City's Analysis of Impediments to Fair Housing Choice, the investment of federal funds is not predominantly geographically distributed; funds are invested based on the needs of low income households and citizens.

### SP-10 Geographic Priorities

91.215 (a)(1)

#### Geographic Area

The City of Billings utilizes federal funding on a citywide basis, targeting qualified low income households for investment and programs.

#### General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Priorities for funding are based on both the most recent Needs Assessment in this Consolidated Plan and the Analysis of Impediments to Fair Housing Choice, completed in 2013. Citation 24 CFR 91.220(f) reads as follows, "When appropriate, jurisdictions should estimate the percentage of funds they plan to dedicate to target areas." Estimating the percentage of funds planned for dedication to target areas is not appropriate for the Billings community due to the following reasons:

- Geographic area is defined by the current City of Billings limits.
- Target areas include high concentrations of low income households, particularly those with higher concentrations of racial / minority households.
- Citywide strategies encourage the distribution of resources support affirmatively furthering fair housing and equal opportunity to avoid segregation in Billings.
- Geographic distribution of investments description includes the focus of resources on a citywide basis to support diversity across the community.
- The City of Billings is classified as a smaller city on a national scale.
- The actual dollar amount dedicated to each program is included in the Annual Action Plan.

The City will focus distribution of investments on a citywide basis in order to support diversity and mixed-income development across the community. The City's performance in serving predominantly low income households is clear via Integrated Distribution Information System reporting; nearly 100%. Neighborhood Revitalization Strategy areas **have not been established** in Billings and there is no specific amount of funding allocated for a target area in the City's geographic distribution of resources. **Therefore, the City plans to dedicate zero percent of funding to target areas in favor of supporting a citywide approach to further fair housing, equal opportunity and anti-segregation efforts.** Table 46 is not included in this Consolidated Plan due to the citywide nature of activities included in this Consolidated Plan.

#	Priority Need	Priority Level	Population	Family Types	Homeless Categories	Non-Homeless Special Needs	
1	Affordable Housing Preservation	High	Extremely Low Low Income	Large With Children Elderly	N/A	Elderly / Frail Elderly Disabled - All HIV/AIDS	
		<b>Description:</b> Preserve existing affordable housing supply, particularly in older neighborhoods, to support the stability of the current affordable housing stock.					
		<b>Basis for Relative Priority:</b> As determined in the Needs Assessment, nearly 10,000 households in Billings have one or more housing problem; just under 60% of the entire jurisdiction. The majority of homeowners are cost burdened; paying greater than 30% to 50% of household income for housing expenses. Preservation of the existing supply of affordable housing is an important factor influencing affordability for existing home owners and potential homebuyers.					
2	New Affordable Housing Opportunity	High	Extremely Low Low Income	Large With Children Elderly Public Housing	Chronic Homeless Individuals Families w/Children Mentally Ill Chronic Substance Abuse Veterans HIV/AIDS Domestic Violence Victims Unaccompanied Youth	Elderly / Frail Elderly Disabled - All Addicted Persons HIV/AIDS Domestic Violence Victims	
		<b>Description:</b> Create affordable housing opportunities to further improve access to and the quality of affordable housing stock.					
		<b>Basis for Relative Priority:</b> Low income households need access to affordable housing and limited housing units are currently available, as indicated in the Market Analysis. According to the Needs Assessment, the majority of homeowners and renters are cost burdened; paying greater than 30% to 50% of household income for housing expenses. The number of people in need is rising, including the homeless, the elderly, and the disabled.					
3	Housing Choice	High	Extremely Low Low Income Moderate Middle	Large With Children Elderly Public Housing	N/A	Elderly / Frail Elderly Disabled - All Addicted Persons HIV/AIDS Domestic Violence Victims	
		<b>Description:</b> Expand housing choice options for existing and potential new residents to foster stable, socio-economically diverse neighborhoods citywide.					
		<b>Basis for Relative Priority:</b> The City's Analysis of Impediments to Fair Housing Choice, cited in the Needs Assessment, identified a dual housing market; one for whites and Asians and one for American Indians, Hispanics and African Americans. Differences between actual and expected racial / ethnic census tract composition are likely due to housing discrimination. The probability of a dual, discriminative market exacerbates access to local housing, particularly for minorities and special populations.					
4	Poverty Impact	High	Extremely Low Low Income	Large With Children Elderly Public Housing	Chronic Homeless Individuals Families w/Children Mentally Ill Chronic Substance Abuse Veterans HIV/AIDS Domestic Violence Victims Unaccompanied Youth	Elderly / Frail Elderly Disabled - All Addicted Persons HIV/AIDS Domestic Violence Victims Non-Housing	
		<b>Description:</b> Support housing and community development specific to lower income and special needs households through poverty-impact initiatives.					
		<b>Basis for Relative Priority:</b> The number of people experiencing poverty and homelessness is on the rise in Billings. As noted in the Needs Assessment, there are now over 700 people experiencing homelessness in Billings at any one point in time; increased from 600 average homeless individuals (2005 to 2008). Public service organizations also require support and capacity building in order to better meet poverty / homeless needs in the community.					

Table 46

**Influence of Market Conditions**

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	There is great need in the Billings community for tenant housing assistance as evidenced by the Needs Assessment and Market Analysis. Those most in need may not have positive credit or rental histories to secure housing in the tight market.
TBRA for Non-Homeless Special Needs	See above. The needs for special needs populations remains high, particularly for the disabled and elderly.
New Unit Production	Affordable housing development, particularly smaller rental units for the homeless, extremely low and low income households, is paramount to the City’s success in meeting current housing needs in Billings. The majority of rental households are cost burdened. Over half of the current voucher holders seeking housing in Billings are not able to secure housing due to high rents and poor unit conditions.
Rehabilitation	Rental and owner rehabilitation greatly influences the quality of affordable housing stock in Billings. For owners, rehabilitation has been shown as an effective neighborhood stabilization tool that effectively lowers the costs to maintain housing. For renters, investment in the affordable housing stock where housing currently exists benefits both the neighborhood overall and maintains the quality of the rental market. Rehabilitation is also utilized as a tool to make accessibility improvements to sustain the affordable housing stock in order to meet the needs of those who are disabled and the elderly.
Acquisition, including preservation	Acquisition for affordable housing development, foreclosure rehabilitation, and first time homebuyer remains a high priority due to the high percentage of owners and renters who are cost burdened. Investment in the acquisition and rehabilitation of the affordable housing stock in Billings meets the needs of extremely low and low income households.

Table 47 – Influence of Market Conditions

**Introduction**

The following table illustrates the CDBG and HOME resources expected for the first year of this Consolidated Plan. The total amount expected for the remaining four years of the Consolidated Plan take into account a five percent decrease in funding resources per year. Other types of funding, including Emergency Shelter Grants, HOPWA funds, Section 8 funds, etc. are not included in the following table as the City of Billings is not a direct recipient.

CDBG administration allocations are capped at 20% of the new CDBG allocation in addition to eligible program income received during the project year. Maximum amounts for public service activities are capped at 15% of the new CDBG allocation and 15% of the previous year’s program income. HOME administration activities are capped at 10% of the new HOME allocation and eligible program income received following the required affordability period. Revenue received during a project’s affordability period is considered recaptured and may not be used for administration.

Expected revenues from the CDBG program include repayments for funding loaned through the Housing Rehabilitation Loan program and other revitalization efforts. The City expects to receive approximately \$75,000 in repayments for the upcoming fiscal year which will be reprogrammed for programs identified herein. The City will not receive proceeds for Section 108 loan guarantees, surplus funds from urban renewal settlements, or float-funded activities.

Revenue expected for the HOME program includes recaptured and program income funding generated by the First Time Homebuyer Loan program. The City expects to receive approximately \$150,000 in HOME funding through these venues, and the funding will be utilized to further programs identified in this Consolidated Plan. The City of Billings programs utilize 100% of CDBG and HOME funding to benefit low to moderate income households and / or areas.

The City may also receive program income attributable to the Neighborhood Stabilization Program.

**Anticipated Resources**

Program	Source of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Public / Federal	\$562,741	\$75,000	\$25,000	\$662,741	\$1,983,314	Entitlement Allocation
	<b>Uses of Funds:</b> Administration, Homeowner Rehabilitation, Homebuyer Acquisition, New Housing Development, Public Services						
HOME	Public / Federal	\$263,688	\$150,000	\$75,000	\$488,688	\$929,337	Entitlement Allocation
	<b>Uses of Funds:</b> Administration, Homebuyer Acquisition, New Housing Development						

Table 48 - Anticipated Resources

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

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The HOME program requires 25% match funding for projects be dedicated from non-federal sources. The City of Billings meets HOME matching requirements through low-interest financing available for First Time Homebuyer Loans issued through the Montana Board of Housing (MBOH) and matching funds provided for other affordable housing projects undertaken with HOME funds, such as private contributions and other local bank financing.

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

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City staff does not anticipate publically owned land will be utilized to address needs identified in the Consolidated Plan.

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, nonprofit organizations, and public institutions.

The City of Billings is the lead government entity responsible for Consolidated Plan activities funded through CDBG and HOME.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Billings	Government	Planning Affordable Housing Ownership Affordable Housing Rental	City of Billings Jurisdiction
Housing Authority of Billings	PHA	Public Housing Affordable Housing Ownership Affordable Housing Rental	Billings Area

Table 49 - Institutional Delivery Structure

**Assess of Strengths and Gaps in the Institutional Delivery System**

The City of Billings - Community Development Division is a small branch of the City’s government with a total of 4.5 full time equivalent staff positions. Strengths of the Division include:

- **Longevity:** Staff have worked, on average, over seven years in the Division and have over 36 years of collective experience in working with federal grant programs in the Division.
- **Advanced Training and Certifications:** Four of the staff members have HOME certifications, including: Regulations (four staff members); Administration (three staff members); and Rental Compliance (two members). Staff members have also been trained in Lead-Based Paint Risk Assessment and Environmental Review.
- **Focused Goals and Programs:** When funding levels were higher, the Division was able to fund and manage many diverse programs to meet community needs. As funding levels diminished, staff has condensed program development, management and implementation on a few core programs, including: First Time Home Buyer; Home Repair programs; Foreclosure Acquisition / Rehabilitation; Affordable Housing Development; and the Billings Metro VISTA Project as the City’s primary anti-poverty initiative. Streamlining programs has resulted in the development of comprehensive procedures and forms to maintain program compliance, including: Section 3, Lead-Based Paint, Subsidy Layering, Labor Standards, Environmental Review, etc.
- **Affordable Housing Partnerships:** City staff have forged strong relationships with the Housing Authority of Billings, local developers, realtors, contractors, lenders, and agencies interested in affordable housing development and preservation. City staff also maintains relationships with the staff working in HOME and CDBG programs across the state, including the Montana Department of Commerce, the Missoula Department of Grants and Community Programs, and the Great Falls Planning and Community Development Department.
- **Poverty and Homeless Services Partnerships:** Through the development and implementation of the City’s anti-poverty initiative, the *Billings Metro VISTA Project*, and the City’s ten-year plan to impact

homelessness, *Welcome Home Billings*, City staff have created partnerships with over 50 social service agencies, benefit providers, faith communities, philanthropic organizations and private industry leaders to expand coordination, collaboration and efficacy. Information on local Continuum of Care efforts can be found in the PR-10 Consultation section of this Consolidated Plan.

Gaps in the local institutional delivery system exist primarily due to funding limitations, particularly for administrative functions. Billings offers a great number of services to its citizens, but needs for funding, staffing, innovative programs and coordination exist. The ability to effectively relay information regarding the service array in Billings to those in need has been one of the community’s greatest challenges. A comprehensive strategy for overcoming service gaps in the institutional delivery system is a priority of many organizations involved in overall community development initiatives.

Through efforts of the Community Development Division and the Mayor’s Committee on Homelessness, with the support of the capacity building efforts of the Billings Metro VISTA Project, the community has benefitted from several initiatives aimed at improving public awareness of service delivery structure including: Resource Notepads / Maps; Illuminate Homelessness; Faith Engagement; capacity-building for 37 nonprofit organizations; and the annual Billings Community Connect event, formerly known as Project Homeless Connect.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

<i>Service Continuum</i>	<i>Available in the Community</i>	<i>Targeted to Homeless</i>	<i>Targeted to People with HIV</i>
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X		X
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	X
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X		X
Employment / Training	X		X
Healthcare	X	X	X
HIV/AIDS	X		X
Life Skills	X		X
Mental Health Counseling	X	X	X
Transportation	X	X	X
<b>Other</b>			
Housing First	X	X	

Table 50 - Homeless Prevention Services Summary

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

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A complete listing of services to meet the needs of the homeless is located in MA-30 Homeless Facilities and Services. The services listed herein meet the needs of some who are experiencing homelessness in the Billings community. The main issue with service delivery is the lack of resources relative to the number of people seeking assistance. The greatest barrier in the coordination of the institutional delivery structure to serve the homeless is community capacity and funding sources to manage long-term efforts. In recent years, the recession impacted the fundraising ability and sustainability of local nonprofit organizations. Several nonprofits have greatly limited services due to overwhelming need and a greatly diminished donor pool.

Through efforts of the Community Development Division and the Mayor's Committee on Homelessness, with the support of the capacity building efforts of the Billings Metro VISTA Project, the community has benefitted from several initiatives aimed at improving public awareness of service delivery structure including: Resource Notepads / Maps; Illuminate Homelessness; Faith Engagement; capacity-building for 37 nonprofit organizations; and the annual Billings Community Connect event, formerly known as Project Homeless Connect.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

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The service delivery system for special needs populations and the homeless in Billings is bolstered by the vast service array available for those seeking assistance. The Community Development Division has spearheaded many initiatives based on national best practices, including the development and implementation of the State's first ten-year plan to impact homelessness. City staff also led the creation of a Billings Community Connect annual event, which serves hundreds of people per year. The City has funded two *housing first* projects to provide chronically homeless families and individuals *housing first* to create a solid foundation prior to enhancing support service and benefits delivery. City staff have also created the Billings Metro VISTA Project to enhance capacity building efforts to support local nonprofit organizations serving special needs and the homeless.

Recent community efforts to meet urgent needs, particularly for individuals experiencing street living, identified the need for a 24/7 low-barrier warming center providing safe sleeping and supportive services for those who are not able to access services from other service providers due to eligibility barriers. More information on the Community Innovation Summit and subsequent efforts can be found online at the Spare Change for Real Change website at [www.4realchange.org](http://www.4realchange.org).

While Billings provides a vast array of services to persons experiencing homelessness, the majority of services are only available to individuals enrolled to receive services. For others, the basic services are adequate to meet basic human needs such as food, clothing, toiletries, and referrals.

Resources are not adequate to meet the need of the general homeless population, including housing, temporary shelter beds, dental care, vision care, and day centers. The most urgent need in the community is housing, both *long-term affordable housing* and *safe sleeping / low-barrier facility* for those not meeting eligibility requirements for other programs.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

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**Affordable Housing Preservation:** The City has the comprehensive ability to address priority needs through home repair programs such as Housing Rehabilitation, Manufactured Home Repair, and Foreclosure Acquisition / Rehabilitation. Contractors trained in lead-safe work methods are limited and staff advertises contractor opportunity through print media, on the City's website, through the Neighborhood Task Forces and holding public informational meetings. Emphasis on the provision of opportunity to Section 3 and minority and women-owned businesses ensures furthering equal opportunity to low income owners / employers, racial / ethnic minorities and businesses owned by women.

**New Affordable Housing Opportunity:** The City maintains positive relations with the Housing Authority of Billings, developers, lenders, realtors and others to ensure collaboration and engagement in the implementation of First Time Home Buyer and Affordable Housing Development programs. City staff currently facilitates regular meetings for the Affordable Housing Task Force and Billings Partners for American Indian Home Ownership to facilitate engagement and participation in City programs. The City has one currently certified Community Housing Development Organization and is actively seeking additional organizations for the purposes of affordable housing development.

**Housing Choice:** City staff maintain positive and close relationships with the staff at Montana Fair Housing, who is the primary organization in fair housing education and enforcement for the state. The City's Analysis of Impediments to Fair Housing Choice revealed the beginnings of segregated neighborhoods and lending discrimination for Hispanic Americans in Billings. The Analysis contained the following recommendation:

*Billings should establish a housing service center, much like the Oak Park Regional Housing Center, where home seekers are introduced to housing options beyond the racial or ethnic neighborhoods to which they often feel they are limited. In Billings, the housing service center should seek to expand the housing search of minorities beyond the census tracts where the proportion of minorities is significantly greater than would be expected in a free market without discrimination. It should seek to expand the housing choices of Whites to those parts of the city where the proportion of Whites is less than would be expected in a discrimination-free housing market.*

At the invitation of the City, NeighborWorks Montana researched the potential of a comprehensive housing center to serve low income renters and homeowners. All of the Billings housing organizations, including City of Billings, the Housing Authority of Billings, Rebuilding Together, District 7 HRDC, Rural Dynamics, Beartooth Resource Conservation and Development, and Homeward agreed to join together to form the Home Center of Billings. To date, \$105,000 has been raised from private investors. A suitable building has been located in downtown Billings, which is central to the City's low income and minority neighborhoods.

The Home Center is expected to provide comprehensive housing services including fair housing information, housing education, counseling, development and revitalization. As a collaboration, no single entity will provide all of the services, but collectively, services can be available under one roof, creating the opportunity for potential homebuyers and renters seeking safe, affordable homes to access all of the services in a one-stop-shop.

**Poverty Impact:** CDBG and HOME resources are not adequate to meet the need of the homeless and those experiencing poverty in Billings. The City's main anti-poverty initiative is the implementation of the

Billings Metro VISTA Project. The City has provided full-year and summer associate support to 37 nonprofit organizations to date and the continuance of this initiative is imperative to support capacity building efforts to strengthen service delivery to those in need. The Billings Metro VISTA Project enables the City to support nonprofit organizations in a sustainable fashion since the provision of public service grants is no longer an option due to dwindling CDBG allocations.

To the greatest extent possible, City staff will continue to implement ***Welcome Home Billings***, the City's ten-year plan to impact homelessness. It is a comprehensive document that includes data, resources, cross-cutting strategic goals and programmatic goals. The *Strategic Framework* is currently used as a guiding tool for homeless / poverty impact (following page).

# WELCOME HOME BILLINGS

## Strategic Framework: Ten-Year Plan to Impact Homelessness

**Vision:** No one in Billings has to be homeless. Everyone in Billings has access to tools and opportunities for safe, appropriate, affordable housing.

**Mission:** The Mayor’s Committee on Homelessness has partnered with local organizations and community members to develop and implement a comprehensive ten-year plan in the pursuit of ending chronic homelessness in the Billings community.

### CROSS-CUTTING STRATEGIC GOALS

<b>COLLABORATION</b>	<b>A: Join community partners with resources to address homelessness intervention and prevention efforts and facilitate partnerships to improve collaboration, service array, leveraging and capacity.</b>	
	<b>A1:</b>	Develop resources for funding homeless initiatives and coordinate grant efforts.
	<b>A2:</b>	Support Billings Community Connect as an annual event.
	<b>A3:</b>	Create modes of communication between partnering organizations to facilitate coordination, avoid duplication, and increase collaboration to maximize resources.
<b>AWARENESS</b>	<b>B: Increase advocacy and public knowledge on behalf of the homeless.</b>	
	<b>B1:</b>	Utilize the ten-year plan to provide guidance regarding homeless policy for local, state, and federal entities.
	<b>B2:</b>	Increase understanding of the causes and economic realities of homelessness through targeted public awareness campaigns for homeless projects and service events.
	<b>B3:</b>	Promote understanding and respect for all people experiencing homelessness.
	<b>B4:</b>	Provide venues for those experiencing homelessness to have their ideas and concerns heard.
<b>ACCOUNTABILITY</b>	<b>C: Ensure innovation, fiscal responsibility and long-term effectiveness for projects and programs.</b>	
	<b>C1:</b>	Support both prevention and intervention modalities for projects and programs.
	<b>C2:</b>	Closely monitor trends in the needs of the homeless and near-homeless in Billings in order to respond to community need.
	<b>C3:</b>	Research innovation in homeless services and facilitate capacity-building with local service providers and community organizations to implement improved services.
	<b>C4:</b>	Support education efforts for case management, mentoring and services.
<b>SUSTAINABILITY</b>	<b>D: Ensure high standards for management, accountability and performance measurement.</b>	
	<b>D1:</b>	Embrace public involvement, comment and input for ten-year planning and project development efforts.
	<b>D2:</b>	Ensure performance measurements are implemented with each project and data is gathered and analyzed on a routine basis.
	<b>D3:</b>	Evaluate projects for long-term sustainability as part of the routine processes prior to endorsement or facilitation.
	<b>D4:</b>	Evaluate cost-effectiveness, essential services, and long-term business resource planning for all projects.
	<b>D5:</b>	Embrace public involvement, comment and input for ten-year planning and project development efforts.

# WELCOME HOME BILLINGS

Strategic Framework: Ten-Year Plan to Impact Homelessness

## PROGRAMMATIC STRATEGIC GOALS & PRIORITIES

HOUSING		PREVENTION		SERVICES		ASSETS	
<b>E: Increase the city's supply of decent, affordable housing.</b>		<b>F: Provide adequate emergency homeless prevention programs.</b>		<b>G: Expand treatment /service capacity and linkage to essential services.</b>		<b>H: Increase personal income levels and economic opportunities.</b>	
<b>E1:</b>	Increase supportive housing units, permanent rentals, transitional housing units, veterans housing, emergency shelter beds, housing for those returning from prison and those in recovery.	<b>F1:</b>	Increase funding dedicated to rent, utilities and mortgage assistance.	<b>G1:</b>	Expand coordinated intensive case management and street outreach services for the homeless.	<b>H1:</b>	Increase access to social service and income benefits by ensuring assistance is provided to complete applications.
<b>E2:</b>	Seek federal, state and local funding sources to support affordable housing development for households with very low income (0 - 30% Area Median Income).	<b>F2:</b>	Support incentive programs for landlords to rent to the homeless or those at risk for homelessness, and increase service provider capacity to engage in long-term leasing and / or rental ownership.	<b>G2:</b>	Increase assistance to complete applications and facilitate application streamlining to access services, transportation, employment and housing.	<b>H2:</b>	Support asset development, education, job training, and employment opportunities serving the homeless (and those at risk of homelessness) throughout the community.
<b>E3:</b>	Build local service provider capacity for affordable housing development, management and housing rehabilitation.	<b>F3:</b>	Support pre-release / discharge planning education and intervention for all institutional services including foster care, prison, jail, and behavioral health facilities.	<b>G3:</b>	Increase availability and capacity of health care, mental health, substance abuse services, medication assistance and access to legal assistance to the very low income / uninsured.	<b>H3:</b>	Establish mentoring support systems, life skills training, and childcare assistance to the homeless (and those at risk of homelessness) currently in the workforce.
<b>E4:</b>	Provide Community Housing Development Organization (CHDO) capacity-building opportunities through the City's Community Development Division.	<b>F4:</b>	Utilize <i>housing first</i> and <i>rapid re-housing</i> philosophies in developing housing options to shorten homelessness.	<b>G4:</b>	Support increases in capacity for day center operations across the city.	<b>H4:</b>	Support the expansion of financial fitness and credit assistance programs.
<b>E5:</b>	Decrease barriers to obtaining existing housing units and refine housing placement services and coordination.	<b>F5:</b>	Support case management efforts to transition occupants from shelter care to permanent supportive housing.	<b>G5:</b>	Support expansion of community-based, criminal justice diversion and re-entry programs.	<b>H5:</b>	Promote fair wage rates and competitive bidding through the expansion of social enterprise efforts.
<b>E6:</b>	Facilitate collaborative grant and loan applications for affordable housing development to serve the homeless.	<b>F6:</b>	Support landlord-tenant intervention to prevent eviction.	<b>G6:</b>	Establish one-stop shop to access all services for the homeless.	<b>H6:</b>	Increase financial management services for those in need.

**Goals Summary Information**

Funding allocated in this section represents an estimate of resources to be utilized over a five-year period utilizing a five percent decline in HUD Entitlement funding, estimated program income and prior year resources available for FY15-16. Projects are funded on a close- and shovel-ready basis for core programs as described in this Plan.

#	Goal Name	Years	Category	Outcome & Objective	Area	Needs Addressed	Funding	Goal Outcome Indicator - Five Years
1	Affordable Housing Preservation	2015 to 2019	Affordable Housing	Affordability & Suitable Living Environment	City wide	Affordable Housing Preservation	CDBG, NSP \$1,797,516	<b>31 Household Housing Units</b> <i>Homeowner housing rehabilitated</i> <i>Five foreclosure units, 26 owner-occupied rehabilitation</i>
		Preserve existing affordable housing supply, particularly in older neighborhoods, to support the stability of the current affordable housing stock: <ul style="list-style-type: none"> <li>• Provide direct, affordable financing and assistance to low income homeowners for the completion of needed repairs citywide.</li> <li>• Revitalize low income neighborhoods through foreclosure remediation, redevelopment and infill development.</li> </ul>						
2	New Affordable Housing Opportunities	2015 to 2019	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	Availability / Accessibility & Decent Housing	City wide	New Affordable Housing Opportunity	HOME \$1,298,722 CDBG funding possible	<b>4 Rental Units Constructed</b> <i>The Affordable Housing Development Program is expected to create ten new affordable housing units, which could be rental / owner, new construction / rehabilitation</i>  <b>175 Households Assisted</b> <i>Direct Financial Assistance to Homebuyers</i>
		Create affordable housing opportunities to further improve access to and the quality of affordable housing stock: <ul style="list-style-type: none"> <li>• Provide affordable financing and support to promote homeownership opportunities citywide.</li> <li>• Provide homebuyer education to all households utilizing acquisition programs.</li> <li>• Encourage the citywide development of new affordable single-family, multi-family and special needs housing in the community through private developers and nonprofit organizations.</li> </ul>						
3	Housing Choice*	2015 to 2019	Other: Equal Opportunity	Availability / Accessibility & Suitable Living Environment	City wide	Housing Choice	Admin \$628,513	<b>250 Households</b> <i>Home Center and City Programs</i>
		Expand housing choice options for existing and potential new residents to foster stable, socio-economically diverse neighborhoods citywide. <ul style="list-style-type: none"> <li>• Ensure equal opportunity and housing choice with all programs and activities citywide.</li> </ul> For the Housing Choice priority and goal, CDBG and HOME Administrative estimates are entered to support fair housing and equal opportunity across all programs. However, CDBG and HOME Administrative activities will not exclusively be utilized for Housing Choice. Funds will also be utilized for grant and project administration.						
4	Poverty Impact	2015 to 2019	Other	Affordability & Suitable Living Environment	City wide	Poverty Impact	CNCS \$339,329	<b>1,000 Individuals</b> <i>Public service activity for low income benefit, VISTA</i>
		Support housing and community development specific to lower income and special needs households through poverty-impact initiatives. <ul style="list-style-type: none"> <li>• Encourage collaboration to better address needs and to respond to opportunities for special needs populations.</li> </ul> Poverty Impact initiatives are funded primarily as CDBG Public Service activities and may be funded at 15% of the total CDBG Entitlement and program income received by the City of Billings. The following estimate is provided based on a 13% new HUD Entitlement allocation as planned for FY15-16. In future years, this allocation may increase to the full 15% allowable amount.						
*Community Development Block Grant (CDBG)    Neighborhood Stabilization Program (NSP)    HOME Investment Partnerships Program (HOME) CDBG or HOME Administration (Admin)    Corporation for National and Community Service (CNCS)								

Table 51 – Goals Summary

\*Goal not included in IDIS version, as no funding is allocated.

**Estimate the number of extremely low income, low income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

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The City expects to:

- Assist 26 low income households with home repair programs.
- Acquire and rehabilitate five foreclosed, vacant homes to sell to five low income households.
- Assist 175 low income households through the First Time Home Buyer program and assist 250 households through the Billings Home Center.
- Develop four new affordable housing units, which may be rental or owner, new construction or rehabilitation to provide housing for ten low income households through the Affordable Housing Development program.
- Serve 1,000 extremely low and low income individuals through poverty impact initiatives through the Billings Metro VISTA Project.

*SP-50 Public Housing Accessibility and Involvement*

91.215(c)

**Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

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The Housing Authority of Billings performed a baseline Section 504 Needs Assessment that was updated in detail for physical changes in 1992 and the assessment is reviewed annually. The Housing Authority keeps track of demand for accessible units and wait list needs to determine when more accessible units may be needed. The Housing Authority also keeps a list of accessible units in the community for the Section 8 and Shelter Plus Care participants to assist them in their search. This is completed via outreach survey to all landlords participating in the program. Outreach is facilitated throughout the year to those who may need housing in accessible units. It often takes many offers before a unit is filled by a client requiring an accessible unit.

The Housing Authority performs outreach to many agencies several times annually and to other program lists to make sure staff are able to fill accessible units with a family or individual who may need such a unit. If staff is not able to serve households for accessible units when their application comes to the top of the waiting list, they are offered a voucher to look for housing within the community. If an accessible unit at another program managed by the Housing Authority has not been filled, applicants are allowed to transfer to that program.

The Housing Authority will continue to review 504 Assessment results to determine when additional units and bedroom sizes may be needed in the inventory and research how to best implement those needs as they arise. As part of all Housing Authority programs, the disabled and handicapped are encouraged and allowed to request reasonable accommodations using approved Fair Housing Office forms to assist with whatever physical or assistance needs they may have. The Housing Authority's five-year and annual action plan submissions, including Section 504 information, is on file at the local Housing Authority office for review.

**Activities to Increase Resident Involvements**

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Each year the Housing Authority assesses physical needs identified by tenants through their Resident Advisory Board for the Annual Plan process; comments are also solicited via Resident Council functions

throughout the year. These comments, Board participation, tenant commissioners, and Public Housing Administration's daily communications with the Housing Authority's client base serve to assist in assessing client needs for physical adjustments, security issues, and needed links with the community. The physical needs improvements are implemented along with staff recommendations in the Capital Fund planning process.

### Is the public housing agency designated as troubled under 24 CFR part 902?

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The Housing Authority is expected to continue achieving High Performer ranking on their PHAS report, which assesses in great detail the management, operations, financial, resident survey, and physical needs addressed by the agency.

### Plan to remove the 'troubled' designation

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Not applicable to the Housing Authority of Billings.

## SP-55 Barriers to Affordable Housing

91.215(h)

### Barriers to Affordable Housing

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Several barriers to the affordable housing development and maintaining residency in housing have been identified. They include:

- **Economic Conditions:** The Needs Assessment and Market Analysis indicate median housing cost has exceeded median household income for certain household income levels. Lower income households have a difficult time affording and maintaining a suitable home in the current market.
- **Cost of Development:** This includes infrastructure costs and leapfrog development.
- **Difficulty in Paying for Needed Repairs:** Many low income households pay greater than 30% to 50% of their income for housing costs. Many of these households do not have the resources to pay for needed repairs to the property.
- **Few New Manufactured Housing Developments:** It is a challenging process for new manufactured housing developments to be approved, which may raise the price of existing lots due to the value of limited units. Owners of manufactured homes have a difficult time finding an affordable place for their housing unit. While manufactured housing has drawbacks, it also provides an affordable rental lot option for many families. The construction quality with manufactured housing continues to improve.
- **Tax Structure:** Dependence on property taxes to support local government costs, including infrastructure.

Additional barriers have been identified in the City's Analysis of Impediments to Fair Housing Choice, including:

- Concentrations of minorities that would not exist in a free market not distorted by discrimination suggest that Billings has a dual housing market; one for non-Hispanics, Whites and Asians and another for all other minorities.
- Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing.
- Discrimination against Latinos in issuing government-backed mortgage and refinancing loans continues unabated in Billings as it does throughout the nation.
- The relatively high cost of housing continues to pose a barrier to fair housing choice in Billings.
- A review of Unified Zoning Regulations and review requirements to foster compliance with fair housing law and to promote inclusionary zoning.
- There is a serious shortage of housing affordable to holders of Housing Choice Vouchers in the areas where the proportion of public school students from low income neighborhoods is relatively low.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

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The City plans on assisting with: housing affordability for renters / owners; cost of development; difficulty in paying for needed repairs; manufactured housing developments; and tax structure by implementing the following programs:

- Housing Rehabilitation
- Manufactured Home Repair
- Foreclosure Acquisition / Rehabilitation
- First Time Home Buyer
- Affordable Housing Development

Relative to the barriers identified in the City's Analysis of Impediments to Fair Housing Choice, the City plans on the following activities:

- Produce and disseminate consumer education on Fair Housing issues through ongoing publicity campaigns to make people aware they can move anywhere in the area they can afford.
- Work to expand housing choices of existing and potential new residents beyond neighborhoods identified by their own race or ethnicity.
- Continue to partner with enforcement agencies providing testing of the real estate industry practitioners to identify discriminatory practices in rental and for-sale housing.
- Support the efforts of local housing counseling agencies, especially to Latinos, before they apply for a mortgage.
- Continue to provide brochures containing information apprising potential home buyers of the availability of housing counseling and how to spot / report discriminatory lending practices.
- Continue to work toward the provision of affordable housing through Community Development programs.
- Support the efforts of the Planning Division in reviewing the following for feasibility:

- Minimum percentage of affordable housing units per development with five or more units.
  - Housing Authority of Billings first right of refusal for inclusionary units.
  - Amendments for neighborhood plans to promote stable, socio-economically diverse neighborhoods throughout Billings.
  - Affirmative marketing and billboard advertising requirements.
  - Developer brochure distribution requirements.
  - Fair Housing logo / language requirements for agreements.
  - Occupancy requirements and equal treatment for group living for the disabled.
  - Accessory dwelling units / cottage cluster homes.
- Support efforts to promote economic diversity in all schools to ensure every school has a majority of pupils coming from middle-class / higher-income households.
  - Support the Housing Authority's efforts to expand the geographic range where holders of Housing Choice Vouchers look for housing.

*SP-60 Homelessness Strategy*

91.215(d)

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

The City does not directly receive Continuum of Care, Emergency Shelter Grant, or other federal funds to exclusively support efforts to impact homelessness outside of CDBG Administration. CDBG resources have decreased dramatically, which greatly inhibits the City's ability to support overall administrative activities to coordinate services to benefit the homeless, particularly when the City does not receive mainstream federal funding sources to impact homelessness directly.

In 2006, City staff wrote a ten-year plan to impact homelessness and began implementing the plan and community initiative, **Welcome Home Billings**. Local housing, health services, and social services organizations have been intricately involved in planning processes for the homeless and chronically homeless, including members of the Mayor's Committee on Homelessness. To the greatest extent possible, City staff will continue to implement **Welcome Home Billings** primarily through the **Billings Metro VISTA Project** resources. VISTA members may be placed at the City to undertake objective citywide initiatives. VISTA members may also be placed at nonprofit Host Site organizations to work on specific anti-poverty initiatives.

The Community Development Division's ongoing activities, dependent on adequate administrative resources, include:

- Supporting the annual **Billings Community Connect** event, formerly known as Project Homeless Connect.
- Continuing to develop and distribute the City's **Resource Map** and **Notepad**, which includes a comprehensive downtown service directory for anyone seeking assistance.
- Supporting capacity building efforts of nonprofit organizations who provide direct assistance to the homeless and those at risk of homelessness through the **Billings Metro VISTA Project**.

- Supporting ongoing *Community Innovation Summit* efforts to engage those living on the streets in service provision and treatment.

Additional information regarding cross-cutting strategic and programmatic goals to impact homelessness is located in SP-40 Institutional Delivery Structure. Specific Goals and strategies relative to **outreach activities** are as follows.

*Cross Cutting Goals - Awareness:*

- B: Increase advocacy and public knowledge on behalf of the homeless.
- B4: Provide venues for those experiencing homelessness to have their ideas and concerns heard.

*Programmatic Goals & Priorities - Services:*

- G: Expand treatment /service capacity and linkage to essential services.
- G1: Expand coordinated intensive case management and street outreach services for the homeless.

The Mental Health Center manages a Projects for Assistance in Transition from Homelessness (PATH) outreach program to engage those living outside or in areas unfit for human habitation. Tumbleweed runs a Street Outreach program to seek out unaccompanied youth to engage them in services. A complete listing of services, including outreach, is included in the MA-30 Homeless Facilities and Services section of this Consolidated Plan.

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

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To the greatest extent possible, City staff will continue to implement *Welcome Home Billings*, the City's ten-year plan / initiative to impact homelessness, primarily through the *Billings Metro VISTA Project* resources. VISTA members may be placed at the City to undertake objective citywide initiatives. VISTA members may also be placed at nonprofit Host Site organizations to work on specific anti-poverty initiatives. Additional information regarding cross-cutting strategic and programmatic goals to impact homelessness is located in SP-40 Institutional Delivery Structure. Specific Goals and strategies relative to **emergency and transitional housing** activities are as follows.

*Programmatic Goals & Priorities - Housing:*

- E: Increase the City's supply of decent, affordable housing.
- E1: Increase supportive housing units, permanent rentals, transitional housing units, veterans housing, emergency shelter beds, housing for those returning from prison and those in recovery.
- E2: Seek federal, state and local funding sources to support affordable housing development for households with very low income (0 - 30% AMI).
- E3: Build local service provider capacity for affordable housing development, management and housing rehabilitation.
- E6: Facilitate collaborative grant and loan applications for affordable housing development to serve the homeless.

*Programmatic Goals & Priorities - Prevention:*

- F: Expand treatment / service capacity and linkage to essential services.
- F1: Increase funding dedicated to rent, utilities and mortgage assistance.

- F2: Support incentive programs for landlords to rent to the homeless or those at risk for homelessness, and increase service provider capacity to engage in long-term leasing and / or rental ownership.
- F3: Support pre-release / discharge planning education and intervention for all institutional services including foster care, prison, jail, and behavioral health facilities.
- F4: Utilize housing first and rapid re-housing philosophies in developing housing options to shorten homelessness.
- F5: Support case management efforts to transition occupants from shelter care to permanent supportive housing.
- F6: Support landlord-tenant intervention to prevent eviction.

The shelter homeless needs for the Billings community are primarily met by the Montana Rescue Mission, which operates both a men’s shelter and a women and family shelter. Montana Rescue Mission does not seek nor utilize federal funds for its operation. Several local service providers assist homeless families by providing funding for rent, mortgage, utility, and deposit assistance.

The Community Crisis Center provides crisis intervention and 23 hour stays as a technique to impact chronic homelessness. The YWCA provides transitional housing for victims of domestic violence. A complete listing of services, including emergency and transitional housing, is included in the MA-30 Homeless Facilities and Services section of this Consolidated Plan.

For those living on the downtown streets of Billings, a new position has been created for an addiction / mental health counselor to accompany two downtown police officers when engaging people living on the streets. This initiative has been undertaken as one of the many outcomes from the Community Innovations Summit, which was facilitated by the Community Development Division and the Downtown Billings Alliance. A [recent article](#) published by the Billings Gazette highlights immediate successes as a result of this program.

A complete list of service providers offering housing, services and prevention support is located in MA-30 Homeless Facilities and Services.

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

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To the greatest extent possible, City staff will continue to implement **Welcome Home Billings**, the City’s ten-year plan to impact homelessness and the overarching community initiative bearing the same name, primarily through the **Billings Metro VISTA Project** resources. VISTA members may be placed at the City to undertake objective citywide initiatives. VISTA members may also be placed at nonprofit Host Site organizations to work on specific anti-poverty initiatives. Additional information regarding cross-cutting strategic and programmatic goals to impact homelessness is located in SP-40 Institutional Delivery Structure. Specific Goals and strategies relative to **service, housing and prevention** activities are as follows.

*Programmatic Goals & Priorities - Housing:*

E5: Decrease barriers to obtaining existing housing units and refine housing placement services and coordination.

*Programmatic Goals & Priorities - Prevention:*

F: Expand treatment / service capacity and linkage to essential services.

F1: Increase funding dedicated to rent, utilities and mortgage assistance.

F2: Support incentive programs for landlords to rent to the homeless or those at risk for homelessness, and increase service provider capacity to engage in long-term leasing and / or rental ownership.

F3: Support pre-release / discharge planning education and intervention for all institutional services including foster care, prison, jail, and behavioral health facilities.

F4: Utilize housing first and rapid re-housing philosophies in developing housing options to shorten homelessness.

F5: Support case management efforts to transition occupants from shelter care to permanent supportive housing.

F6: Support landlord-tenant intervention to prevent eviction.

*Programmatic Goals & Priorities - Services:*

G: Expand treatment /service capacity and linkage to essential services.

G1: Expand coordinated intensive case management and street outreach services for the homeless.

G2: Increase assistance to complete applications and facilitate application streamlining to access services, transportation, employment and housing.

G3: Increase availability and capacity of health care, mental health, substance abuse services, medication assistance and access to legal assistance to the very low income / uninsured.

G4: Support increases in capacity for day center operations across the city.

G5: Support expansion of community-based, criminal justice diversion and re-entry programs.

G6: Establish one-stop shop to access all services for the homeless.

*Programmatic Goals & Priorities - Assets:*

H: Increase personal income levels and economic opportunities.

H1: Increase access to social service and income benefits by ensuring assistance is provided to complete applications.

H2: Support asset development, education, job training, and employment opportunities serving the homeless (and those at risk of homelessness) throughout the community.

H3: Establish mentoring support systems, life skills training, and childcare assistance to the homeless (and those at risk of homelessness) currently in the workforce.

H4: Support the expansion of financial fitness and credit assistance programs.

H5: Promote fair wage rates and competitive bidding through the expansion of social enterprise efforts.

H6: Increase financial management services for those in need.

A complete list of service providers offering housing, services and prevention support is located in MA-30 Homeless Facilities and Services.

**Help low income individuals and families avoid becoming homeless, especially extremely low income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

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To the greatest extent possible, City staff will continue to implement *Welcome Home Billings*, the City's ten-year plan to impact homelessness. Specific Goals and strategies relative to prevention activities are as follows.

*Programmatic Goals & Priorities - Prevention:*

- F: Expand treatment / service capacity and linkage to essential services.
- F1: Increase funding dedicated to rent, utilities and mortgage assistance.
- F2: Support incentive programs for landlords to rent to the homeless or those at risk for homelessness, and increase service provider capacity to engage in long-term leasing and / or rental ownership.
- F3: Support pre-release / discharge planning education and intervention for all institutional services including foster care, prison, jail, and behavioral health facilities.
- F4: Utilize housing first and rapid re-housing philosophies in developing housing options to shorten homelessness.
- F5: Support case management efforts to transition occupants from shelter care to permanent supportive housing.
- F6: Support landlord-tenant intervention to prevent eviction.

The City does not receive McKinney-Vento Homeless Assistance Act funds and is not required to develop and implement a Discharge Coordination Policy. The Montana Continuum of Care (MT CoC) for the Homeless Coalition is the state's lead agency for addressing homeless activities, and is a statewide collaboration of diverse homeless service providers, nonprofit organizations and local and state governments. The coalition was formed to address homelessness with very few resources to cover Montana's vast geographical area. The system is established upon community and regionally based continuum of care systems, which form the statewide coalition and continuum of care process. The City supports the MT CoC in their efforts to establish a Statewide Discharge Coordination Policy.

The City's work with the homeless is impacted significantly by the fact that it is not a direct recipient of homeless funding. Funds are provided to the State of Montana and are distributed by the State to various regions in Montana through the Human Resource Development Councils. A Continuum of Care application is prepared on a statewide basis and the City plays a supportive role in this process.

The City's homeless activities are complemented by the work of a primary provider of shelter to individuals and women and families in Billings; the Montana Rescue Mission (MRM). The MRM effectively raises funds to support its various activities including job training and transitional housing programs. The MRM traditionally has not pursued or accepted government grants outside of the Billings Metro VISTA Project.

The City does not receive Emergency Shelter Grant funds. These funds are distributed statewide by the Montana Department of Public Health and Human Services through ten HRDCs throughout the state. The local District 7 HRDC utilizes these funds to support rapid re-housing activities in conjunction with the local shelters.

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**Actions to address Lead-Based Paint (LBP) hazards and increase access to housing without LBP hazards**

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The City continues to be in compliance with HUD's lead-based paint requirements as established in September of 2000. According to the American Community Survey estimates from 2007-2011, it is estimated that there are over 29,317 housing units built before 1979 that are at risk of containing lead-based paint, which comprises 64% of the total housing stock in Billings. Not all of the homes built prior to 1979 contain lead-based paint and lead hazards. However, projects involving structures built prior to 1978 are considered to have the potential for lead-based paint and consistent procedures have been developed to ensure compliance with federal regulations.

In 2012, the Center for Disease Control recommended action for children with elevated levels greater than or equal to five ug/dL. The Montana Department of Public Health and Human Services cited a [2012 field study](#) conducted in 11 counties in the state. Children enrolled in Medicaid aged one to five years were tested for elevated blood lead levels. Nearly 600 children participated in the study, and three percent of the children had levels  $\geq$  five ug/dL. One in four of the children tested had  $\geq$  one ug/dL. This information is the latest data available on children in Montana and exposure to lead as of March 2014.

The City will continue diligence while undertaking rehabilitation and construction activities in order to maintain the safety of households participating in federal programs. Participants in the City's housing programs are made aware of the requirements the City must follow when providing assistance. Education on the hazards of exposure to lead is provided for each rehabilitation project. The City currently offers risk assessments, through certified staff, paint inspections, clearance testing, and has access to lead-safe certified contractors to ensure compliance.

In addition, the City also promotes lead-safe work practices training whenever it is offered in Montana, which gives local contractors the opportunity to become certified in lead-safe work methods. The City will continue to maintain working relationships and partner in furthering educational efforts with lead-based paint professionals to ensure HUD requirements are effectively met.

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**How are the actions listed above related to the extent of lead poisoning and hazards?**

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Unlike many larger jurisdictions, the City of Billings does not have a high prevalence of lead poisoning. The City's actions related to housing rehabilitation and development activities are preventive in nature.

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**How are the actions listed above integrated into housing policies and procedures?**

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The City's procedures contain provisions for lead-based paint compliance in all programs. A complete set of forms is currently utilized by staff for the purposes of lead-paint inspection, assessment, notification, reporting and compliance.

**Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

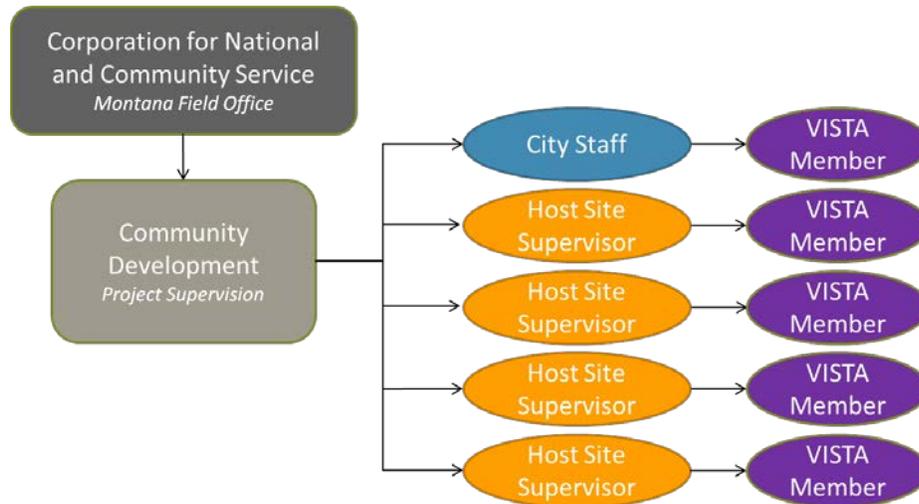
The Needs Assessment contains comprehensive information on the lower income status of local households. All of the Consolidated Plan strategies target the improvement of economic conditions of lower income households in the community, including housing development, financing home repair, continuing partnerships and funding public service activities. The City’s strategies to promote affordable housing and fair housing citywide, and to preserve the existing housing stock and the neighborhoods where the affordable housing stock is located, will compliment economic development efforts by providing safe, decent, and affordable housing and livable neighborhoods for lower income households in our community. The City proposes to support the following specific activities in this Consolidated Plan to address economic conditions of low and moderate-income households in Billings:

- Continue to work with nonprofit organizations to help address the human service needs of lower income residents of the community in general and of our lower income neighborhoods in particular. This would be achieved primarily through supporting capacity building efforts of social service agencies through implementation of the *Billings Metro VISTA Project*.
- Continue to support the work of local economic development organizations to help create higher wage jobs for low income persons.
- Continue to apply for the AmeriCorps VISTA project status in order to bring full-time and summer associate volunteers to work on capacity-building for the homeless initiatives through *Welcome Home Billings*, the City’s ten-year plan to impact homelessness and overarching community driven homeless impact initiative.

AmeriCorps VISTA is a national anti-poverty initiative that places full-year and Summer Associate volunteers with local projects. Full-year VISTA members are recruited locally and nationally, are college graduates and commit to at least a year of service with a project. Summer Associates are at least 18 years old and commit to ten weeks of service.

<b>Focus Area</b>	<b>Objective</b>	<b>Programming Area: Specific to People Experiencing Poverty</b>
<b>Economic Opportunity</b>	<b>Financial Literacy</b>	Financial services and related programs to enhance financial literacy.
	<b>Housing</b>	Services to improve housing situations and access to affordable housing, including transitioning individuals into or helping them remain in safe, healthy, affordable housing.
	<b>Employment</b>	Employment-related services to improve employability leading to increased success in becoming employed / maintaining a job.
<b>Education</b>	<b>School Readiness</b>	Services for children to make gains in school readiness in the following areas: Social / Emotional Development; Literacy Skills; and Numeracy / Math Skills.
	<b>K-12 Success</b>	Services to improve academic performance and engagement for students, particularly for students in low-achieving schools.
	<b>Post-Secondary Success</b>	Services to increase enrollment and completion of post-secondary education.
<b>Healthy Futures</b>	<b>Food Security</b>	Services to gain access to food resources and access to nutritious food.
	<b>Access to Health Care</b>	Services to gain access to preventative and primary health care services.
<b>Veterans &amp; Military Families</b>	<b>Veterans Served</b>	Any of the above programming areas targeting services for low-income veterans, family members, members of active duty military and military service members.

The structure of the Billings Metro VISTA Project serves to build the capacity of nonprofit organizations to work on poverty issues (see graphic below). VISTA members may serve at the City to work on initiatives with citywide benefit such as: Faith Engagement in Homelessness; Illuminate Poverty; Resource Map and Notepad; Veterans and Military Families; Billings Community Connect; and Food Security. More information on citywide initiatives can be found on the [City's Poverty Impact Initiatives](http://www.ci.billings.mt.us/poverty) website. Information on VISTA can be found online at [www.ci.billings.mt.us/vista](http://www.ci.billings.mt.us/vista).



VISTA members may also be placed at nonprofit Host Site organizations to work on specific anti-poverty projects to benefit the organization’s clients. To date, 136 VISTA members were placed at 37 Host Site organizations, including:

- Philanthropic organizations such as:
  - United Way of Yellowstone County
- Housing organizations such as:
  - Housing Authority of Billings
  - Rebuilding Together for Yellowstone County
  - NeighborWorks Montana
- Social service organizations like:
 

<ul style="list-style-type: none"> <li>○ Family Support Network</li> <li>○ Center for Children and Families</li> <li>○ Mental Health Center</li> <li>○ Montana Rescue Mission</li> <li>○ District 7 HRDC</li> <li>○ Self Help Law Center</li> <li>○ National Alliance on Mental Illness Billings</li> <li>○ Tumbleweed Program, Inc.</li> </ul>	<ul style="list-style-type: none"> <li>○ Boys &amp; Girls Club</li> <li>○ Independence Hall, serving homeless veterans</li> <li>○ Family Service, Inc.</li> <li>○ Billings Head Start</li> <li>○ Friendship House</li> <li>○ Family Promise of Yellowstone Valley</li> <li>○ Crow Veteran’s Affairs</li> <li>○ YWCA Billings</li> </ul>
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- Adjacent public entities have also been served by the VISTA program, including:
  - Billings Public Library
  - Billings Public Schools
  - Downtown Billings Association
  - Billings Police Department
  - Planning & Parks Divisions

**How are the Jurisdiction’s poverty-reducing goals, programs, and policies coordinated with this affordable housing plan?**

Poverty reduction is addressed through the Billings Metro VISTA Project and staff implementation of **Welcome Home Billings**, the City’s ten-year plan to impact homelessness and the overarching homeless impact initiative. Affordable housing programs are operated in tandem with poverty impact efforts. Priority needs, program goals, policies and procedures are all in alignment with poverty impact and affordable housing activities.

The Community Development Division’s method for linking priority needs identified through the Housing Needs Assessment, Market Analysis and Analysis of Impediments to Fair Housing Choice to outcomes involves a multi-layered approach. Once programs meeting priority needs have been identified, several matrices are reviewed for relevance and connectivity:

- HUD Objectives / Outcomes
- HUD’s Livability Principles
- Analysis of Impediments to Fair Housing Choice
- Billings City Council’s Strategic Plan



The above-noted matrices have been provided, in order, as a reference for the **City’s FY2015-2019 Consolidated Plan Strategies, Objectives, Activities and Outcomes Table**.

<b>HUD Objectives / Outcomes Matrix</b>			
	<b>Availability / Accessibility</b> Making the basics available to low income households	<b>Affordability</b> Making an activity more affordable to low income households	<b>Sustainability</b> Using resources to make an area / project more viable
<b>Decent Housing</b>	<b>DH-1:</b> Enhance Suitable Living Environment through Improved/New Accessibility	<b>DH-2:</b> Enhance Suitable Living Environment through Improved/New Affordability	<b>DH-3:</b> Enhance Suitable Living Environment through Improved/New Sustainability
<b>Suitable Living Environment</b>	<b>SL-1:</b> Create Decent Housing with Improved/New Availability	<b>SL-2:</b> Create Decent Housing with Improved/New Affordability	<b>SL-3:</b> Create Decent Housing with Improved/New Sustainability
<b>Economic Opportunity</b>	<b>EO-1:</b> Provide Economic Opportunity through Improved/New Accessibility	<b>EO-2:</b> Provide Economic Opportunity through Improved/New Affordability	<b>EO-3:</b> Provide Economic Opportunity through Improved/New Sustainability

### **HUD Livability Principles Matrix**

*The formation of the interagency Partnership for Sustainable Communities involved HUD, the U.S. Department of Transportation and the US Environmental Protection Agency in June 2009. These three agencies are working together to support efforts to expand housing and transportation efforts while protecting the environment. This partnership promotes reinvestment in existing communities, expanding access to employment and education, and collaborative planning.*

<b>Principles</b>	<b>Strategies</b>	<b>City Principles</b>
<b>A.</b> Provide more transportation choices.	Develop safe, reliable, and economical transportation choices to decrease household transportation costs, reduce our nation's dependence on foreign oil, improve air quality, reduce greenhouse gas emissions, and promote public health.	Ensure all newly developed housing units supported with City funds are located adjacent to existing transportation services and undergo Environmental Review to assure impact to the environment is minimized.
<b>B.</b> Promote equitable, affordable housing.	Expand location- and energy-efficient housing choices for people of all ages, incomes, races, and ethnicities to increase mobility and lower the combined cost of housing and transportation.	Ensure equal access to projects supported by home repair, first time homebuyer, and development programs, and ensure projects are offered citywide.
<b>C.</b> Enhance economic competitiveness.	Improve economic competitiveness through reliable and timely access to employment centers, educational opportunities, services and other basic needs by workers, as well as expanded business access to markets.	Support public service activities, the development of social enterprise businesses and Section 3 activities.
<b>D.</b> Support existing communities.	Target federal funding toward existing communities through strategies like transit oriented, mixed-use development, and land recycling to increase community revitalization and the efficiency of public works investments and safeguard rural landscapes.	Ensure community revitalization efforts remain in overall strategies and activities of the Consolidated Plan and continue to work cooperatively with other departments to integrate planning.
<b>E.</b> Coordinate and leverage federal policies and investment.	Align federal policies and funding to remove barriers to collaboration, leverage funding, and increase the accountability and effectiveness of all levels of government to plan for future growth, including making smart energy choices such as locally generated renewable energy.	Ensure partnerships, where possible, are created and maintained to maximize program usage.
<b>F.</b> Value communities and neighborhoods.	Enhance the unique characteristics of all communities by investing in healthy, safe, and walkable neighborhoods; rural, urban, or suburban.	Support housing and transportation development activities designed to reflect existing neighborhoods and walkable / vistable communities.

### **Analysis of Impediments to Fair Housing Choice Matrix**

*The following chart illustrates the results of the latest Analysis of Impediments to Fair Housing Choice, including identified impediments and recommended strategies to impact barriers. In order to further illustrate the City's intent to affirmatively further fair housing, impediments and strategies identified in this document are linked to the City's overall Consolidated Plan activities.*

<b>Selected Impediments</b>	<b>Proposed Strategies</b>
<b>A.</b> Concentrations of minorities that would not exist in a free market not distorted by discrimination suggest that Billings has a dual housing market; one for non-Hispanics, Whites and Asians and another for all other minorities.	<b>A1:</b> Produce and disseminate consumer education on Fair Housing issues through ongoing publicity campaigns to make people aware that they can move anywhere in the area they can afford.
	<b>A2:</b> Work to expand housing choices of existing and potential new residents beyond neighborhoods identified by their own race or ethnicity.
<b>B.</b> Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing.	<b>B1:</b> Continue to partner with enforcement agencies providing testing of the real estate industry practitioners to identify discriminatory practices in rental and for-sale housing.
<b>C.</b> Discrimination against Latinos in issuing government-backed mortgage and refinancing loans continues unabated in Billings as it does throughout the nation.	<b>C1:</b> Support the efforts of local housing counseling agencies, especially to Latinos, before they apply for a mortgage.
	<b>C2:</b> Continue to provide brochures containing information apprising potential home buyers of the availability of housing counseling and how to spot / report discriminatory lending practices.
<b>D.</b> The relatively high cost of housing continues to pose a barrier to fair housing choice in Billings.	<b>D1:</b> Continue to work toward the provision of affordable housing through Community Development programs.
<b>E.</b> Review Unified Zoning Regulations and review requirements to foster compliance with fair housing law and to promote inclusionary zoning.	<b>E1:</b> Support the efforts of the Planning Division in reviewing: <ul style="list-style-type: none"> <li>- Minimum percentage of affordable housing units per development with five or more units.</li> <li>- Housing Authority of Billings first right of refusal for inclusionary units.</li> <li>- Amendments for neighborhood plans to promote stable, socio-economically diverse neighborhoods throughout Billings.</li> <li>- Affirmative marketing and billboard advertising requirements.</li> <li>- Developer brochure distribution requirements.</li> <li>- Fair Housing logo / language requirements for agreements.</li> <li>- Occupancy requirements and equal treatment for group living for the disabled.</li> <li>- Accessory dwelling units / cottage cluster homes.</li> </ul>
	<b>F1:</b> Support efforts promote economic diversity in all schools to ensure every school has a majority of pupils coming from middle-class / higher-income households.
<b>F.</b> There is a serious shortage of housing affordable to holders of Housing Choice Vouchers in the areas of Billings where the proportion of public school students from low income neighborhoods is relatively low.	<b>F2:</b> Support the Housing Authority's efforts to expand the geographic range where holders of Housing Choice Vouchers look for housing.

**City Council - Strategic Plan Matrix**

*The City's 2012 Priority Based Budgeting Results are also noted below. Quartile One services are considered essential in supporting the goals and values established for the City, whereas Quartile Four programs are considered less essential.*

<b>Goal</b>	<b>Objective</b>	<b>Action</b>
<p><b>A: Honest, Responsive Government:</b> Strengthen and ensure public trust by governing effectively.</p>	<p><b>A1:</b> Ensure regulatory conformity for federally funded programs and projects by establishing comprehensive compliance procedures and dedicating staff resources to carry out program implementation, risk assessment, compliance planning and monitoring activities.</p>	
<p><b>B. Comprehensive, Orderly Growth &amp; Development:</b> Manage growth in a way that protects the existing community.</p>	<p>Develop, preserve, and revitalize residential neighborhoods that are safe and attractive, and provide diverse, affordable housing.</p>	<p><b>B1:</b> Dedicate resources to rehabilitate substandard housing via the provision of loan financing to lower income households in order to preserve and revitalize neighborhoods citywide (Quartile One).  <b>B2:</b> Dedicate resources to develop new, affordable housing in all neighborhoods to promote inclusion, equal opportunity, and access (Quartile Three).  <b>B3:</b> Dedicate resources to acquire and rehabilitate vacant and/or foreclosed properties in order to promote infill, stabilize neighborhoods, and prevent decline (Quartile Two).</p>
<p><b>C. Sustainable Economic Development:</b> Further the economic vitality of Billings, and the greater region, by fostering community partnerships and maintaining a strong and efficient infrastructure.</p>	<p>Provide a safe, healthy, and attractive place to live and work; and offer quality housing choices, accessible amenities, and an environment that provides a desirable quality of life.</p>	<p><b>C1:</b> Dedicate resources to support homeownership opportunities through loan financing to low income households (Quartile One).  <b>C2:</b> Determine the feasibility of creating a housing center to support potential and existing residents in their quest to obtain, retain, and maintain stable housing. If feasible, create a strategic plan for implementation.  <b>C3:</b> Support initiatives to alleviate poverty and promote economic opportunity through Welcome Home Billings, the City's ten-year plan to impact homelessness, and the AmeriCorps VISTA program. The City must support an anti-poverty strategy to receive CDBG funding (Quartile Two).</p>

**FY2015-2019 CONSOLIDATED PLAN**  
**Strategies, Objectives, Activities and Outcomes**

July 1, 2015 through June 30, 2020

Strategy	Objective	Activity	Type	#	HUD Objectives / Outcomes	Council Strategic Plan	Priority Based Budgeting	Livability Principles	Impediment Strategies	\$ Source
A: Preserve existing affordable housing supply, particularly in older neighborhoods, to support the stability of the current affordable housing stock.	Provide direct, affordable financing and assistance to low income homeowners for the completion of needed repairs citywide.	Housing Rehabilitation Loan Program	Housing Units	25	SL-2: Create Decent Housing w/Improved / New Affordability	A1, B1	Quartile 1	B, C, F	D1	CDBG
		Manufactured Home Repair Loan Program		1		A1, B1	Quartile 1	B, C, F	D1	CDBG
	Revitalize low income neighborhoods through foreclosure remediation, redevelopment and infill development.	Foreclosure Acquisition / Rehabilitation Loan Program		5		A1, B1, B2, B3	Quartile 2	B, C, F	A1, A2, C1, C2, D1	CDBG, NSP
	Affordable Housing Development Program	4		A1, B2		Quartile 3	A, B, C, D, F	A1, A2, C1, C2, D1	CDBG, HOME	
B: Create affordable housing opportunities to further improve access to and the quality of affordable housing stock.	Provide affordable financing and support to promote homeownership opportunities citywide.	First Time Homebuyer Program	Housing Units	175	SL-2: Create Decent Housing w/Improved / New Affordability	A1, B2, B3, C1	Quartile 1	A, B, E, F	A1, A2, C1, C2, D1	CDBG, HOME
	Provide homebuyer education to all households utilizing acquisition programs.		Households	175	EO-3: Provide Economic Opportunity through Improved/New Sustainability	A1, B2, B3, C1	Quartile 1	B, C, E, F	A1, A2, C1, C2, D1	CDBG, HOME
	Encourage the citywide development of new affordable single-family, multi-family and special needs housing in the community through private developers and nonprofit organizations.	Affordable Housing Development Program	Housing Units	See Above	SL-2: Create Decent Housing w/Improved / New Affordability	A1, B2	Quartile 3	A, B, C, D, F	A1, A2, C1, C2, D1	CDBG, HOME

Strategy	Objective	Activity	Type	#	HUD Objectives / Outcomes	Council Strategic Plan	Priority Based Budgeting	Livability Principles	AI Barriers / Strategies	\$ Source
C: Expand housing choice options for existing and potential new residents to foster stable, socio-economically diverse neighborhoods citywide.	Ensure equal opportunity and housing choice with all programs and activities citywide.	All Programs	-	-	SL-1: Create Decent Housing with Improved/New Availability	A1, B1, B2, B3, C1, C2, C3	-	B, E	A1, A2, B1, C1, C2, D1, E1, F1, F2	Admin
		Billings Home Center	Clients	250						Admin
	Ensure core programs are implemented citywide to promote desegregation and inclusive neighborhoods.	All Programs	-	-						Admin
D: Support housing and community development specific to lower income and special needs households through poverty-impact initiatives.	Encourage collaboration to better address needs and to respond to opportunities for special needs populations.	Billings Metro VISTA Project	Clients	1,000	EO-1: Provide Economic Opportunity through Improved/New Accessibility	A1, C3	Quartile 2	E	D1, F2	CNCS, CDBG
		Billings Home Center	Households	See Above	SL-1: Create Decent Housing with Improved/New Availability	A1, C2	-	B, E	A1, A2, B1, C1, C2, D1, E1, F1, F2	Admin

\*Community Development Block Grant (CDBG) Neighborhood Stabilization Program (NSP) HOME Investment Partnerships Program (HOME)  
CDBG or HOME Administration (Admin) Corporation for National and Community Service (CNCS)

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

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The goals to be achieved through the Consolidated Plan will be monitored on a yearly basis as required as part of the CAPER submitted to HUD for the Consolidated Plan. Monitoring consists of:

- Examination of the community's use of available HUD, state, and local resources to meet the affordable housing and community development needs as outlined in the Consolidated Plan.
- Examination of the effectiveness of the programs in place.
- Review of public comments received on the community's performance in meeting the affordable housing and community development needs described in the City's Consolidated Plan.

The City funds a variety of programs to carry out CDBG and HOME funded activities each year. Each of these subrecipients is required to enter into a detailed agreement that specifically describes funding use and monitoring.

**Organizations:** The City may fund a variety of organizations to carry out City-funded activities each year and would enter into a written agreement specifically describing scope of work and funding use. Organizations receiving City funds will generally be monitored on-site by Community Development staff at to ensure compliance with the terms of the agreement and applicable regulations. Site visits will include monitoring in the following areas:

- Compliance with agreement timeframe
- Rate of expenditures
- Continued eligibility of the activities under the agreement
- Adequate documentation concerning client eligibility and service delivery

Compliance with federal regulations will also be monitored, including (but not limited to) a review of the following:

- American Disabilities Act
- Fair Housing Act
- Equal Employment Opportunity
- Section 3 of the Housing and Urban Development Act of 1968
- Uniform Administrative Requirements
- Davis-Bacon Labor Standards (on-site inspections required)

Assisted organizations are required to have audits performed pursuant to OMB Circular A-133 and submitted to the City on an annual basis. In addition, assisted organizations are required to submit quarterly / annual reports during the grant period and / or the period of affordability.

### **Community Housing Development Organizations (CHDOs)**

The City requires CHDOs apply for recertification on an annual basis to ensure continued requirements are being met for CHDO designation, including (but 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.

### **Affordable Housing Projects**

Housing projects are monitored via desk review and / or site-visits, including inspections, on a schedule based on the number of units in the project:

<b># of Units</b>	<b>Frequency of On-Site Monitoring</b>
1 - 4 Units	Every 3 years
5 - 25 Units	Every 2 years
26+ Units	Every year
Source Documentation	Every 6 years
<i>Staff inspects 15% - 20% of the total HOME units per project, minimum one unit in each building</i>	

On-site visits include property standards compliance inspections, tenant file review, household income verification, etc. City staff will also conduct 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; and the year-end profit and loss statements show the project is profitable and/or sustainable for the period of affordability.

**Risk Assessments:** 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 risk assessment includes reviewing:

- Number of units
- Staff turnover and experience
- Funding amounts and affordability periods
- Type of assistance provided
- File and project documentation
- Past performance

Projects with higher risk assessment scores are prioritized for intensive case management efforts to bring the project into compliance and may receive multiple site visits and technical assistance from City staff.

### **First Time Home Buyers**

Homebuyers receiving assistance are monitored for residency requirements by US Postal Service and noncompliant projects are prioritized for intervention through the City's legal office.