



**City of Billings**

# **HOME-ARP**

# **Allocation Plan**



**Community Development**

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## Consultation

*Before developing its plan, a Participating Jurisdiction (PJ) must consult with the Continuum of Care(s) (CoC) serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.*

### **Describe the consultation process including methods used and dates of consultation.**

The City of Billings Community Development Division developed and distributed a survey to local service providers in October 2022. The survey was designed to establish community needs, identify gaps relative to homelessness, and engage consultation partners in the allocation planning process. The survey solicited information concerning the Qualifying Populations (QPs) as defined in the [HOME-ARP requirements](#). Agencies that served one or more QP within the past 12 months were asked to identify the following: population(s) served (including demographics and household types); services provided to each population; waiting time to access services; shelter usage; priority housing and shelter needs for each population; priority service needs for each population; and unmet service needs for each population. Agencies were also provided the opportunity to demonstrate interest in accessing HOME-ARP funding. Additionally, information gathered from survey responses allowed City staff to evaluate organizational capacity to carry out a HOME-ARP project.

An online version of the survey was released on October 12, 2022. Links to the survey were posted on the City's website and sent via email to 84 local agencies. Hard-copy surveys were also mailed to these agencies to provide alternative methods for completion. The survey deadline was November 14, 2022. City staff coordinated with organizations that did not meet that deadline in order to give an opportunity to provide supplementary data online through November 18, 2022. City staff offered additional means to obtain agency information including emails, phone calls, and meetings through December 30, 2022. Homeless service providers, domestic violence service providers, Public Housing Agencies (PHAs), public and private agencies addressing the needs of qualifying populations, organizations involved with civil rights and fair housing, and agencies serving persons with disabilities were invited to complete the survey. Providers were also given the option to request technical assistance and/or meet with City staff to discuss the requested information. The following agencies submitted at least partial responses to the City's survey:

Angela's Piazza  
Bureau of Indian Affairs (BIA) Tribal Operations  
Chinook Horses, Equine Therapy  
Community Crisis Center  
Early Childhood Intervention (ECI)  
Family Promise of Yellowstone Valley (FPYV)  
Family Service  
HER Campaign  
HomeFront

*Previously Housing Authority of Billings*

Human Resources Development Council District 7  
Living Independently For Today and Tomorrow  
(LIFTT)  
Montana Rescue Mission (MRM)  
National Alliance on Mental Illness (NAMI) Billings  
Off The Streets Corporation  
RiverStone Health  
The Salvation Army  
St. Vincent de Paul  
St. Vincent Healthcare

Support & Techniques for Empowering People  
(STEP, Inc.)  
SYNERGY HomeCare  
Tumbleweed  
United Way of Yellowstone County

Veterans, Inc.  
Yellowstone Co. Human Trafficking Task Force  
Yellowstone County Continuum of Care (CoC)  
YWCA Billings

The following agencies were contacted via email and sent hard-copy surveys, but did not provide feedback:

Adult Resource Alliance of Yellowstone County  
Ag Workers Health and Service  
Alternatives, Inc.  
Alzheimer's Association Montana  
Aware Inc.  
Big Brothers Big Sisters Yellowstone County  
Big Sky Senior Services  
Billings Child Care Association  
Billings Clinic  
Billings Family YMCA  
Billings Fire Department  
Billings Food Bank  
Billings Police Department  
Billings Public Library  
Billings Public Schools  
Billings Urban Indian Health & Wellness Center  
Boys and Girls Club of Yellowstone County  
CASA of Yellowstone County  
Chase Hawks Memorial Association  
Community Leadership and Development, Inc.  
COR Enterprises Dog Tag Buddies  
Dress for Success  
Eagle Mount Billings  
Head Start Explorers Academy  
Family Support Network  
Family Tree Center  
Friendship House of Christian Services  
Gratitude In Action

Habitat for Humanity  
Homecare Services LLC Love Inc.  
South Central Mental Health Center  
Montana United Indian Association Montana  
Veterans Affairs Division  
National Call Center for Homeless Veterans  
Native American Development Corporation  
New Day Ranch  
Residential Support Services, Inc.  
Rimrock  
Rocky Mountain Healthy Living, LLC  
Rocky Mountain Tribal Leaders Council  
Ronald McDonald House of Billings  
Rural Employment Opportunities  
The Home Center  
The Phoenix  
Veteran's Meat Locker  
Veterans Navigation Network  
Veterans Upward Bound Vocational  
Rehabilitation Services  
Veterans of America-Northern Rockies  
Yellowstone Boys and Girls Ranch Yellowstone  
County Sheriff's Office Yellowstone County  
Family Drug Treatment Court  
Yellowstone Youth Crisis Network Yellowstone  
Youth Services Center  
Young Families Early Head Start  
Youth Dynamics, Inc.

On November 10, 2022, staff sent a reminder to the organizations that had not yet submitted agency data. Additional outreach was made to obtain data from the following organizations: Alternatives, Inc. (email and phone) on December 7, 8 & 9, 2022; Volunteers of America (email) on December 7, 2022; HRDC District 7 (email) on November 15 & 29 and December 8, 2022.

HomeFront, the jurisdiction's PHA, was consulted separately via email and they provided information regarding housing vouchers on September 22, 2022.

In addition to evaluating community survey data from the local CoC, City staff consulted with the Montana Continuum of Care, as the City of Billings is included in a statewide CoC.

Programming must be reviewed for to ensure applicable fair housing, civil rights, and nondiscrimination requirements are in place. City staff contacted Montana Fair Housing on December 6, 2022 to provide an explanation of qualifying populations and preferences under the HOME-ARP Notice and to request consultation for review of program procedures and funding applications. The City will defer to Montana Fair Housing to ensure compliance with the conditions as stipulated at [billingsmt.gov/fairhousing](https://billingsmt.gov/fairhousing).

### List of Organizations Consulted

Agency	Agency Type		Method of Consultation
HomeFront	<b>Public Housing Agency</b> Continuum of Care Homeless Services Homeless Prevention Domestic Violence Veterans	Public Agencies Services <i>(Qualifying Population [QP])</i> Fair Housing Civil Rights Persons with Disabilities	In-Person Meeting: July 2022 Zoom meeting: August 30, 2021 Email – vouchers: September 2022 Survey: October 2022 Email – housing waiting lists: February 2023 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for emergency housing, affordable housing, varied multifamily / elderly / veteran housing options, payment assistance, increased capacity for veteran housing vouchers, increased multifamily units, & financial education; reported active in local & state CoC; provided voucher utilization rates and housing waiting list information.		
HRDC District 7	<b>Community Action Agency</b> Continuum of Care Homeless Services Homeless Prevention Domestic Violence	Veterans Fair Housing Civil Rights Persons with Disabilities	Survey: October 2022 Emails requesting additional data: - November 15 & 29, 2022 - December 8, 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided limited survey data; reported active in local & state CoC.		
Community Crisis Center	<b>24-Hour Emergency Shelter</b> Continuum of Care Homeless Services Homeless Prevention Domestic Violence	Sexual Assault / Stalking Human Trafficking Veterans Persons with Disabilities	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for transitional housing; reported active in local & state CoC.		
St. Vincent de Paul	Continuum of Care Homeless Services Homeless Prevention Domestic Violence Sexual Assault / Stalking	Human Trafficking Veterans Fair Housing Civil Rights Persons with Disabilities	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for overnight shelter (low barrier and non-congregate care based on need), mental health and substance use disorder treatment, case management, wrap around services, supportive and transitional housing, social supports, rental assistance, life skills, budgeting, childcare, mental health and trauma informed care, and employment training; reported active in local & state CoC		



Agency	Agency Type	Method of Consultation
RiverStone Health	Continuum of Care Homeless Services Homeless Prevention Domestic Violence Sexual Assault / Stalking Human Trafficking	Veterans Public Agencies (QP Services) Fair Housing Civil Rights Persons with Disabilities
	<b>Feedback:</b> Provided survey data; indicated need for housing, mental health services, transportation, substance abuse treatment, affordable housing, food insecurity, support for people with criminal history, housing availability that take HUD vouchers, increased beds for individuals fleeing domestic violence / dating violence / stalking / sexual assault / human trafficking; reported active in local CoC.	
The Salvation Army	<b>Non-Congregate Shelter</b> Continuum of Care	Homeless Services Homeless Prevention
	<b>Feedback:</b> Provided survey data; indicated need for shelter space for larger families, caregivers' ability to stay with individual in motel room (paid with voucher), assistance paying arrears, substance abuse treatment, mortgage assistance, supportive services, community training, and peer mentors; reported active in local & state CoC.	
Tumbleweed	Continuum of Care Homeless Services Homeless Prevention Domestic Violence	Human Trafficking Fair Housing Civil Rights
	<b>Feedback:</b> Provided survey data; indicated need for affordable housing, emergency shelter, and rental assistance; reported active in local & state CoC.	
Bob Buzzas, Buzzas Consulting & Christopher Sage (Pathways MISI)	<b>Statewide Continuum of Care</b> Homeless Management Information System	Point-in-Time Survey Lead
	<b>Feedback:</b> Provided housing inventory / homeless population data and gap analysis review.	
Yellowstone County Continuum of Care	Continuum of Care Homeless Services Homeless Prevention Domestic Violence Sexual Assault / Stalking	Human Trafficking Veterans Fair Housing Civil Rights Persons with Disabilities
	<b>Feedback:</b> Provided survey data; indicated need for more case management, outreach, transportation, and overnight drop-in care or emergency shelter for youth, mental health and medication management, improved care coordination.	

<b>Agency</b>	<b>Agency Type</b>	<b>Method of Consultation</b>
United Way of Yellowstone County	Continuum of Care	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for permanent supportive housing for highest utilizers of services, transportation, safe affordable housing, affordable quality childcare, mental health services, and legal services; reported active in local CoC.	
St. Vincent Healthcare	Continuum of Care Homeless Services Homeless Prevention	Domestic Violence Veterans Persons with Disabilities
	<b>Feedback:</b> Provided survey data; indicated greatest need for individuals at greatest risk of housing instability; reported active in local CoC.	
YWCA	Continuum of Care Domestic Violence Sexual Assault / Stalking	Human Trafficking Fair Housing Civil Rights
	<b>Feedback:</b> Provided survey data; indicated need for additional shelter space, and affordable safe housing; reported active in local & state CoC.	
Angela's Piazza	Homeless Services Homeless Prevention Domestic Violence Sexual Assault / Stalking	Human Trafficking Fair Housing Civil Rights
	<b>Feedback:</b> Provided survey data; indicated need for more affordable housing, access to mental health care, public transportation, additional support for stalking and human trafficking cases.	
Bureau of Indian Affairs	Homeless Services Homeless Prevention Domestic Violence	Sexual Assault / Stalking Human Trafficking Public Agencies (QP Services)
	<b>Feedback:</b> Provided limited survey data; indicated need for higher wages, additional housing, resources for housing cost assistance / mental health / legal services.	
Montana Rescue Mission	<b>Emergency &amp; Non-Congregate Shelter</b> Continuum of Care Homeless Services	Domestic Violence Fair Housing Civil Rights
	Email inquiring about shelter beds: August 4, 5 & 24; September 5, 18, 2022 Phone: August 5, 2022 Survey: October 2022 Email requesting survey data clarification: January 6, 2023 Email – drafted HOME-ARP Allocation Plan: February 25, 2023 <b>Feedback:</b> Provided survey data; indicated a critical need for additional emergency shelter for individuals, families, and unaccompanied youth; reported active in local & state CoC.	



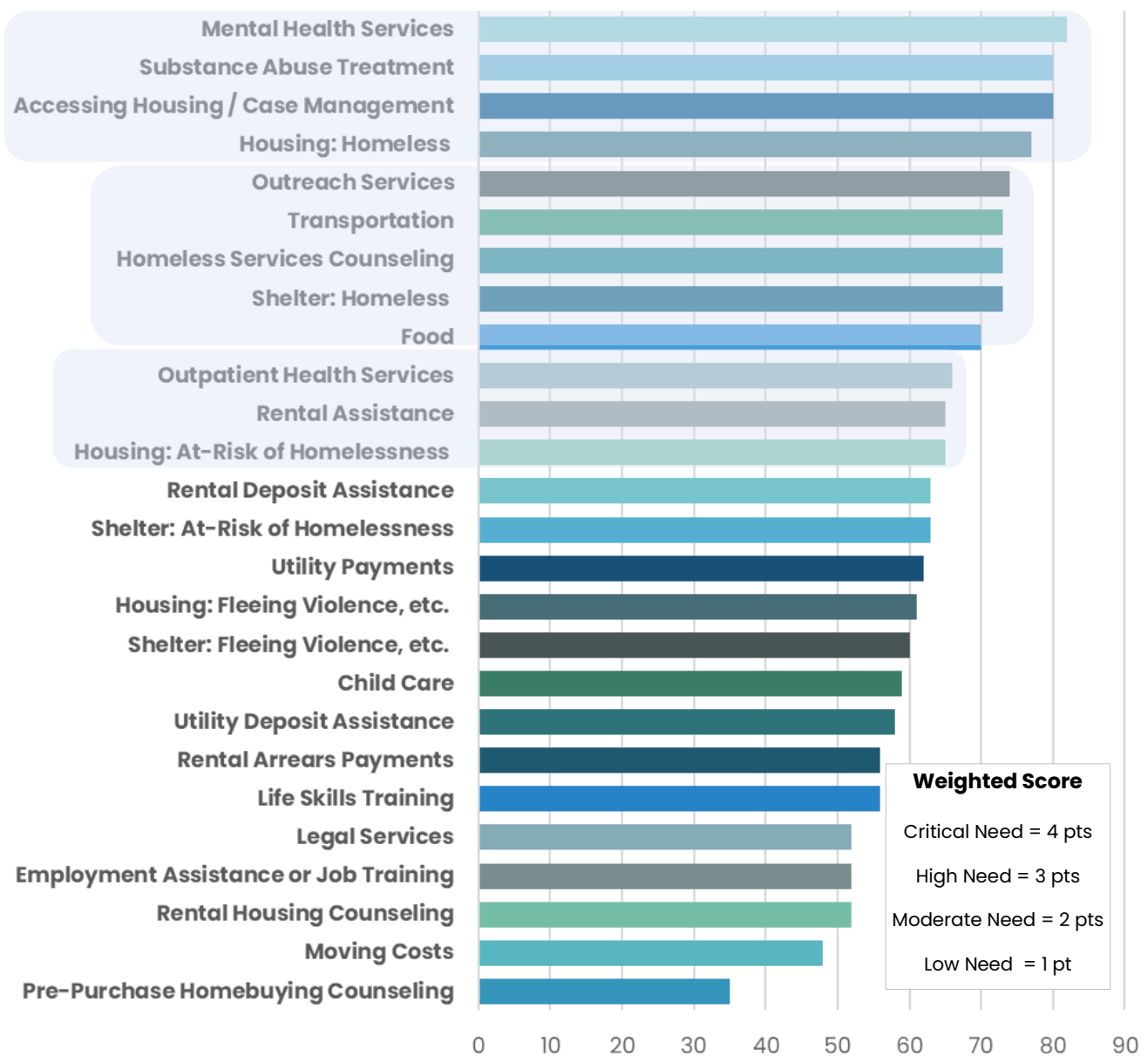
<b>Agency</b>	<b>Agency Type</b>	<b>Method of Consultation</b>
Chinook Horses Equine Therapy	Continuum of Care      Homeless Prevention	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for transportation to attend treatment / mental health services, and access to mental health / substance use / other treatment that accepts Medicaid; reported active in local CoC.	
NAMI	Homeless Prevention      Persons with Disabilities	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated emergency shelter and rental housing as critical needs.	
LIFTT	Homeless Services      Fair Housing Homeless Prevention      Civil Rights Domestic Violence      Persons with Disabilities	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data: indicated need for affordable housing, life skills training, substance abuse treatment, childcare resources, transportation, suicide prevention, workforce training, renter's education, victim advocacy and education / training, temporary shelter, financial education, and counseling.	
HER Campaign	<b>Emergency &amp; Non-Congregate Shelters</b> Human Trafficking	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for low barrier / immediate and short-term placement for survivors of human trafficking; reported active in local & state CoC.	
Family Service	Homeless Services      Domestic Violence Homeless Prevention      Veterans	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided limited survey data; reported active in local CoC.	
Off The Streets Corporation	Continuum of Care      Sexual Assault / Stalking Homeless Services      Human Trafficking Homeless Prevention      Veterans Domestic Violence	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for affordable housing, emergency low barrier shelter, and supportive housing; reported active in local CoC.	
Veterans Inc.	Homeless Services      Veterans Homeless Prevention      Persons with Disabilities Domestic Violence	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for affordable housing, permanent supportive housing, lower deposit and utility costs, financial / credit counseling, domestic violence shelters, financial resources including employment opportunities, more veteran focused providers, and additional funding to support homeless veterans in housing crises; reported active in local & state CoC.	

<i><b>Agency</b></i>	<i><b>Agency Type</b></i>	<i><b>Method of Consultation</b></i>
Family Promise of Yellowstone Valley	<b>Emergency &amp; Non-Congregate Shelters</b> Continuum of Care Homeless Services Homeless Prevention Domestic Violence Sexual Assault / Stalking	Human Trafficking Veterans Fair Housing Civil Rights Persons with Disabilities Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for affordable housing access and preventative services for those at risk of homelessness; reported active in local CoC.	
Early Childhood Intervention	Homeless Services	Persons with Disabilities Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided limited survey data.	
STEP, Inc.	Continuum of Care Homeless Services	Homeless Prevention Persons with Disabilities Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for case management and service coordination among providers, childcare, and transportation; reported active in local CoC.	
SYNERGY HomeCare	Senior Home Care Services	Veterans Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided limited survey data.	
Yellowstone County Area Human Trafficking Task Force	Human Trafficking	Survey: October 2022 Email – drafted HOME-ARP Allocation Plan: February 25, 2023
	<b>Feedback:</b> Provided survey data; indicated need for additional street outreach, case management, 24 hour low barrier shelter options, permanent supportive housing, harm reduction care and services, life skills training, mentorship programs, supportive services to prevent homelessness, childcare, reliable public transportation for shift work, rent and utility assistance, legal assistance, cell phone assistance, health care and financial education, clothing assistance, trauma informed care, integrated health and behavioral care, wrap around services.	

**Summarize feedback received and results of upfront consultation with these entities.**

Agency feedback via the City of Billings HOME-ARP Survey provided a snapshot of the expansive needs for all qualifying populations. Feedback revealed the strongest preference for funding supportive services for all qualifying populations, especially for mental health services, substance abuse treatment, and accessing housing / case management. Outreach services, transportation, and homeless services counseling were also indicated as high needs. Additionally, increasing affordable rental housing units to address the needs of people experiencing homelessness was ranked highly.

### Need for Services, Housing, Shelter by Population



To most effectively address gaps in services and identified needs for all qualifying populations, the City's HOME-ARP Allocation Plan is intended to both promote the development of affordable housing and address the significant need for prioritized supportive services identified by the community. Through the consultation process and review of community data identified in the needs assessment and gaps analysis, the City determined it will not establish a preference for the use of HOME-ARP funds for any qualifying population, as supportive service gaps were prevalent for all qualifying populations.

All households in all qualifying populations will be eligible for, have access to, and benefit from the use of HOME-ARP funding. This will be facilitated through the City's application process. The City of Billings will indicate in its HOME-ARP application that organizations intending to apply for funding should have the capacity to serve all qualifying populations. Alternatively, should organizations that do not serve all qualifying populations apply, the City may implement and advertise an additional application process to ensure all qualifying populations benefit from funding allocations. The City will also provide definitions of all qualifying populations with the understanding that applicant eligibility is dependent on the incorporation of the expanded HOME-ARP definitions.

## Public Participation

*PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less than 15 calendar days. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.*

- The City of Billings was awarded a total of \$1,211,321 in HOME-ARP funding.
- The range of activities the City may undertake include: Administration and Planning; Production or Preservation of Rental Housing; Tenant-Based Rental Assistance (TBRA); Supportive Services; Acquisition or Development of Non-Congregate Shelter; and/or Nonprofit Operating and Capacity Building Assistance. Activities must benefit individuals and/or families experiencing homelessness in qualifying populations.

### ***Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan.***

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First Public comment period:

- Start date: August 26, 2022
- End date: September 12, 2022
- Public Notice Dates: August 12, 19 & 26, 2023

The first public hearing was held on September 12, 2022, to obtain public comment on the needs of those experiencing homelessness while developing the HOME-ARP assessment and planning activities. This public hearing was also utilized for the review of the City's Comprehensive Annual Performance Evaluation Report (CAPER).

Second Public comment period:

- Start date: February 25, 2023
- End date: March 20, 2023
- Public Notice Dates: February 24, 2023, March 3, 10, & 17, 2023

The second public comment period was initially set to end on March 13, 2023 but was extended to March 20, 2023 as a result of public feedback and requests. A revised public notice was published on March 10 and 17. The second public hearing was held on March 13, 2023, at the Billings City Council Regular Meeting to obtain public comment on the drafted HOME-ARP Allocation Plan. The City Council voted to approve the HOME-ARP Allocation Plan via a Substantial Amendment to the City's Fiscal Year 2021-2022 Annual Action Plan. Public comment received between March 13 and March 20 was provided for the Council to review.

### ***Describe the public participation process.***

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In accordance with the City's Citizen Participation Plan, public notice was published in the Yellowstone County News. Various methods for public participation were advertised including accessibility options for individuals with physical disabilities, hearing, speech, and/or vision impairment. This also included the Traditional Relay Service (TTY) number for Montana Relay. Affidavit of Publication is attached in the appendices.

The City notified the agencies consulted as well as those that were sent the initial survey that the draft Allocation Plan was posted on the [City's website](#) for review and public comment. This notification was also sent via a list serv from a representative of the Billings Job Service through the Montana Department of Labor & Industry. Additionally, copies of the plan and notice of public hearing were also emailed to each organization on February 25, 2023.

### ***Describe any efforts to broaden public participation.***

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The community survey released in October 2022 was accompanied by an explanation of funds, eligible activities, and a letter from the City's Mayor, William Cole, to promote participation.

A public informational presentation was organized and held at the Billings Public Library on December 16, 2022. The City provided an overview of eligible funding activities, preliminary survey findings, and program timelines. Two email distribution lists were used to provide details about the presentation and an invitation to attend. In total, 221 local contractors / developers and 176 individuals from the following were contacted:

- Department of Housing and Urban Development (HUD)
- Community Housing Development Organizations (CHDOs)
- Public Housing Agencies
- Montana Fair Housing
- Billings City Council
- Neighborhood Task Forces
- Downtown Billings Alliance
- Non-Profit Organizations

For those who were not able to attend in person, virtual attendance via Zoom was made optional. Over 30 public attendees, one City Council member, and five City staff participated. Attendance lists including Zoom attendees are included in the appendices.

The drafted HOME-ARP Allocation Plan and March 13, 2023, public hearing date was posted on the City of Billings website. Community members were invited to provide comment during the public comment period and/or during the public hearing.



***Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing.***

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The following comments and/or recommendations were received during the public comment period from February 25, 2023 through March 20, 2023:

- Matthew Lundgren, Executive Director, Billings Leadership Foundation / Montana Rescue Mission: provided comments regarding the City's survey and identified potential data issues regarding agencies reporting unduplicated numbers of individuals and families served.
- Dianne Lehm, Director of Community Development, Big Sky Economic Development: requested more information about the purpose of allocating HOME-ARP funds to supportive services versus new housing development.
- Greg Sukut, Executive Director, Great Falls Housing Authority: identified the significant need for more affordable housing; asked the City to consider housing development a top priority.
- Patti Webster, Chief Executive Officer, HomeFront: requested that the public comment period be extended to a minimum of 30 days.
- Michael McManus, Program Coordinator, Veterans Navigation Network: outlined service information and support that Veterans Navigation Network can offer for homeless service providers.
- Georgia Cady, Executive Director, Tumbleweed: expressed that developing additional housing units is the best use of funds.
- Kari Boiter, President, Board of Directors, Yellowstone County Continuum of Care: requested that the public comment period be extended; provided a correction to the initial drafted plan regarding the funding amount awarded to the CoC by City Council to operate a seasonal shelter.
- Teddi Shorten, Chief Occupancy Director, HomeFront: provided concerns about lack of affordable housing in Billings; suggested that producing more affordable housing is the most effective way to stop homelessness.
- Jack Nickels, community member: urged City Council to approve the allocation; in support of increasing affordable housing and finding ways to encourage and incentivize developers.
- Shellie Young Running Crane, community member: expressed facing issues finding affordable housing with few landlords accepting Section 8 vouchers and the high price of rentals.
- Brandi Hernandez, community member: expressed facing housing instability due to lack of affordable housing in Billings; asked for concerns to be considered.
- Dave Graham, community member: expressed issues regarding housing costs.
- Tonya Littlehead, community member: expressed challenges regarding finding affordable housing and issues with deposit costs.
- Ricky Peltier, community member: expressed facing housing and employment instability.

- Cheryl Doney-Murphy, community member: expressed challenges related to finding affordable housing in the area.
- Paulette Not Afraid, community member: expressed facing housing instability due to MERA funding ending in April and lack of affordable housing options.
- Shelley Weber, community member: expressed concerns with high rental costs and lack of housing available.
- Erlissa Hugs, community member: expressed barriers to finding properties that accept Section 8 vouchers and lack of affordable rentals.
- Tehya Murillo, community member: expressed struggle to secure affordable rental housing.
- Veronica Baker, community member: expressed concerns about finding an affordable place to stay with MERA funding ending in May.

The following comments and/or recommendations were received orally at the public hearing held on March 13, 2023:

- Kathy Smit: was initially concerned about HOME-ARP funds not being prioritized for structure development, but after hearing discussion, is now in support of HOME-ARP allocation plan as written and funding supportive services.
- Teddi Shorten – (HomeFront): rental housing is important; has worked with HUD funding and understands complex funding. At HomeFront there are over 900 families on their two-bedroom waitlist and 7,000 families total on waiting lists for affordable housing right now. Supportive services are important, but if there is no housing available it will not be as impactful.
- Pamela Aning – (HomeFront): concerned about people experiencing homelessness as well as people that are working and paying rent that are being “priced out of their homes.” Supportive services are not enough on their own.
- Trina Swafford – (HomeFront): serves all the qualifying populations already; has impeccable record with HUD; both development of housing and supportive services is important, but more housing is needed; felt survey was not comprehensive.
- Bailey Desper: opposed HOME-ARP funds for housing as the amount allocated is not enough funding. People need supportive services to be fully supported.
- Ronalee Skees (District 7 HRDC – Home Center): Billings has a strong community of service providers, and the City Council is heavily involved in addressing housing instability. It is difficult to match needs with federal requirements; asked for City Council to look at all public comments and recommendations before voting.
- David Herres (PATH – Mental Health Center): the overall issue is housing, but the community needs more supportive services and case management to assist others; there needs to be a place where people can receive assistance immediately to make connections and referrals. HOME-ARP funds cannot make a significant impact on housing alone.
- D’Anthony Willis (PATH – Mental Health Center): people need more than just housing; the community must help address underlying issues of what people actually need to be independent and healthy with supportive services.

- Rebecca Noell (Community Development Board Chair): the best way to support the qualifying populations in our city with HOME-ARP dollars is to fund supportive services; urged council to approve the allocation plan as written.
- Jenna Martin (Community Development Board): was in support of the HOME-ARP allocation plan as written. Staff has evaluated all of the ways to best support the community with the funds available and requirements in place.
- Mary Gilluly (St. Vincent de Paul): agreed that funds should be for supportive services as the need is so great. There are people who have never previously asked for assistance that are asking now. With MERA ending, we need to be able to keep people in their homes as well; in favor of the document as written.
- Patti Webster (HomeFront): acknowledged the issue with data collection delays from HomeFront; appreciates the complexity of funding and is in support of more housing development. Waiting lists at HomeFront are growing by about 300 per month, and only 86% of vouchers can be utilized because there are not enough places for people to move into; requested that the City work with providers to both develop housing and support families. It is a great challenge to do subsidy layering and find enough funding. It is important to take more time to take a closer look at the best way to use this funding.

***Summarize any comments or recommendations not accepted and state the reasons why.***

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All comments and recommendations were carefully considered during the allocation planning process. Staff responded to questions, comments, and recommendations received during the public comment period.

Staff exhibited transparency within the allocation plan regarding its public participation process. This included the distribution of the City's service provider survey as well as the analysis process. Survey charts and results are published throughout the plan as well as in the appendices.

Comments suggesting that HOME-ARP funds should be allocated for the development of rental housing and/or non-congregate shelter were considered; however, recommendations to allocate funding for these activities were not implemented in the plan. The City already manages an affordable housing development program with developer funding available; moreover, the provision of supportive services was identified as the most significant priority need for all qualifying populations through the City's consultation process. The City's approach is to prioritize HOME-ARP funding allocations for supportive services and continue to bolster the City's affordable housing development programs, which will most effectively address overall community need.

## Needs Assessment and Gaps Analysis

*PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.*

The City used a variety of sources to guide the needs assessment and gaps analysis. These included the City of Billings HOME-ARP Survey; American Community Survey (ACS) 5-year Data Estimates; Point-In-Time (PIT) counts from January 2020; direct consultation with the Montana Continuum of Care; 2020 Community Health Needs Assessment (CHNA); HRDC District 7: 2020 Community Needs Assessment; and Comprehensive Housing Affordability Strategy (CHAS) data sets from 2014–2018. Additional data on homelessness was obtained from the [\*Homelessness and Housing Supports in Yellowstone County: A preliminary analysis\*](#), a compilation and analysis of Homeless Management Information System (HMIS) data from 2019. The City also utilized direct email consultation to assemble updated housing inventory from local providers. It is important to know that many data sources may not reflect population changes due to the coronavirus pandemic, which reached its first case number peak in Billings in November / December 2020.

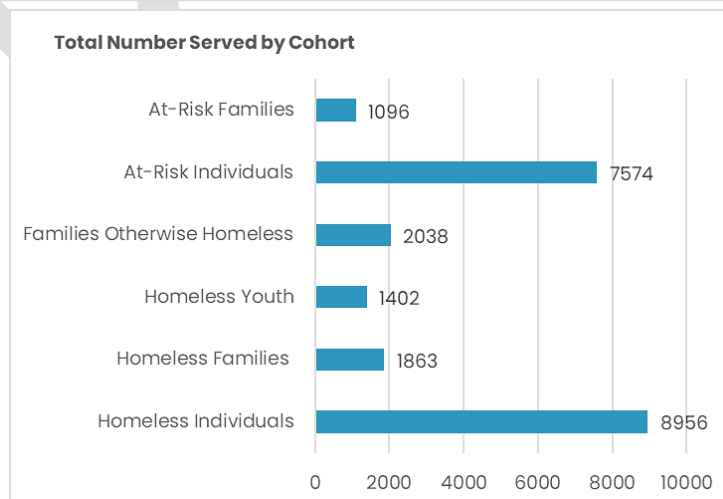
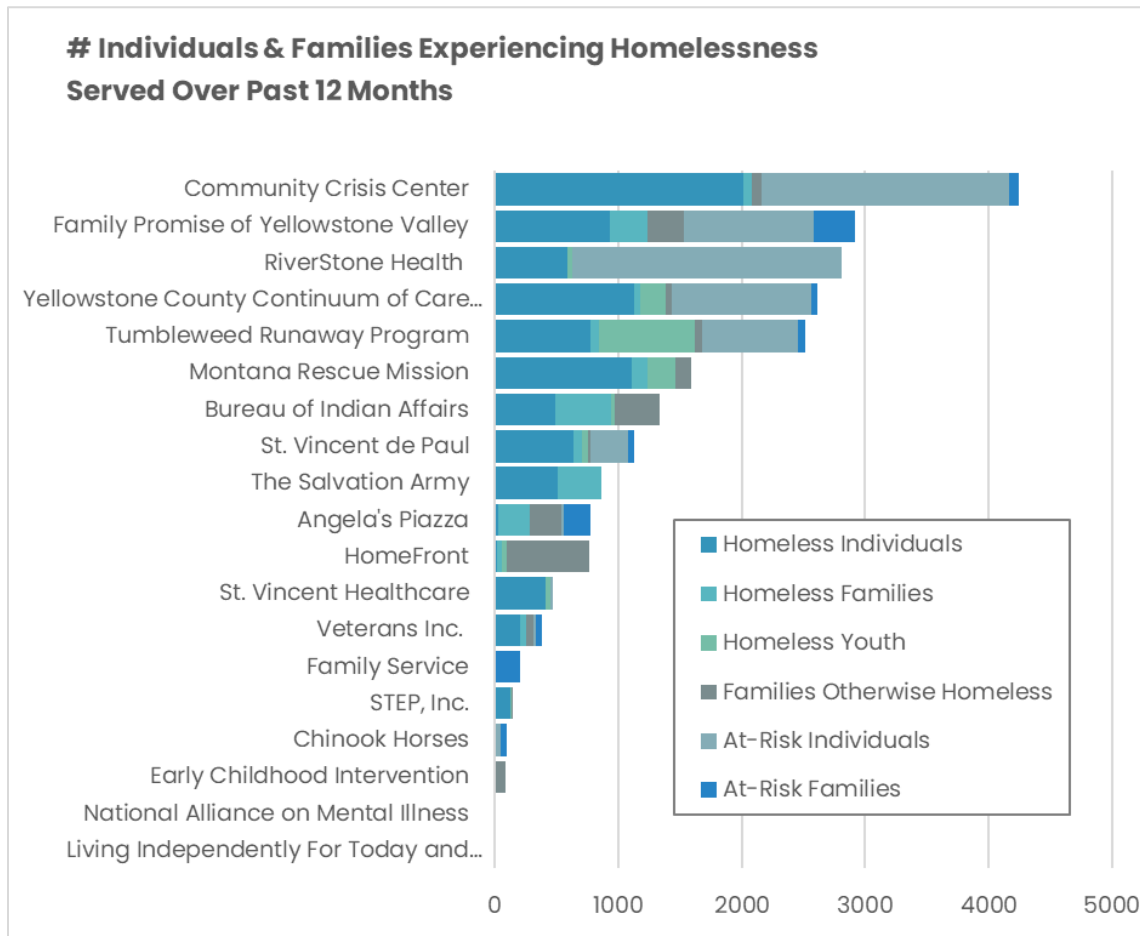
### ***Describe the size and demographic composition of qualifying populations within the PJ's boundaries.***

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The survey process for the City of Billings provided staff with general knowledge regarding the number of individuals and families served by local organizations in each qualifying population over the past twelve months. The City acknowledges that social service agencies may collect, assess, and report demographics and eligibility criteria differently from each other as well as differently from the HOME-ARP definitions. Some agencies may not have had the data tools in place to gather this information and respond effectively to this type of survey. It is important to note that, in the survey, respondents were asked to report on the number of unduplicated individuals in the HOME-ARP qualifying populations and were provided with separate definitions of each; however, it appears some organizations may have duplicated numbers of individuals and families served across multiple qualifying populations within the survey. Therefore, the total numbers served from multiple qualifying populations appears to be duplicated in some survey charts. City staff made the effort to clarify and/or obtain additional data as needed. A full chart depicting the populations served, as reported by social service organizations in the survey, can be found in Appendix D.

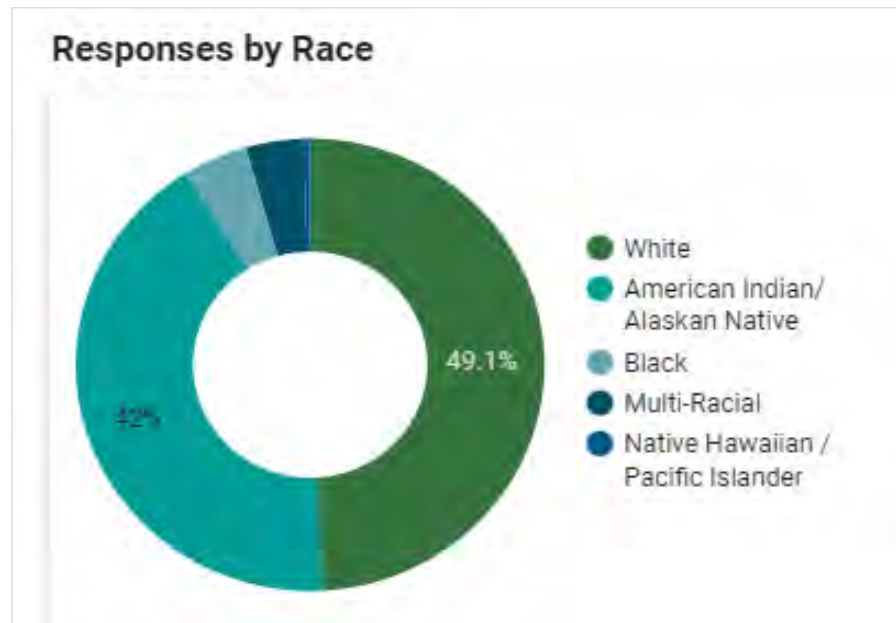
Accounting for potential duplication of individuals and families served, it appears the Community Crisis Center, Yellowstone County Continuum of Care, and Montana Rescue Mission served the highest number of individuals experiencing homelessness. The Bureau of

Indian Affairs served the highest number of homeless families, while Tumbleweed provided services for the most unaccompanied youth. RiverStone Health provided services for the highest number of individuals at-risk of homelessness. Family Promise of Yellowstone Valley served the highest number of at-risk families. Homeless individuals were the most frequently served population reported in the City's survey, followed by at-risk individuals. Please note, organizations may have served the same individuals and families during the reporting period.



### ***Homeless as defined in 24 CFR 91.5***

According to the [January 2020 Point-In-Time \(PIT\) survey](#), there were 1,545 people experiencing homelessness in the State of Montana. In Billings, 224 people (167 households) were counted in this survey – 15% of Montana’s total homeless population. The overall population experiencing homelessness decreased from 2018 to 2020 (2,060 in 2018 and 1,676 in 2019).



Source: [Montana Homeless Survey](#)

In the January 2020 PIT count, 49% of homeless individuals counted in Billings were White, 42% were American Indian / Alaskan Native, 5% were Black, 4% were Multi-Racial, and 0.1% were Native Hawaiian / Islander. Approximately 18% of individuals identified as Hispanic. The Black, Indigenous, People of Color (BIPOC) community was disproportionately represented compared to [population and racial estimates in Billings \(U.S. Census Bureau QuickFacts\)](#).

In the 2020 PIT count, 65% of homeless individuals in Billings identified as male, and 34% identified as female. Individuals within the ages of 25–44 made up 46% of the population. It is important to note that according to Billings HMIS data from the previous year, 24% of the total population accounted for was youth, ages 13 – 17; the largest percentage for a singular age demographic ([Homelessness and Housing Supports in Yellowstone County: A preliminary analysis](#)). Upwards of 54% of households reported having at least one disability, whereas [only 9% of Billings residents under 65 reported having a disability \(U.S. Census Bureau QuickFacts\)](#). These included physical health, mental health, and/or substance abuse.

According to the [Homelessness and Housing Supports in Yellowstone County: A preliminary analysis](#) report, 337 unhoused patients were seen an average of 2.35 times at St. Vincent Healthcare in 2019. Billings Clinic saw 264 unhoused patients for a total of 1,051 visits in 2018. Both facilities reported that the majority of these patients were male and people of color.



In the 2020 PIT Survey, most Billings respondents reported they were sleeping outside; however, data obtained in PIT counts may not account for all households served by organizations in Billings. According to 2019 HMIS data in the Billings Coordinated Entry System (CES), 23% of unhoused adults and 14% of families were sleeping outside upon initial assessment.

The same PIT Survey noted that the majority of households (twenty-nine) indicated they had been experiencing homelessness for over two years. Thirty-nine households reported having been homeless four or more times in the last three years. Most households estimated they had been unhoused for twelve months or more each time they had experienced homelessness. Therefore, 30% of the population surveyed were considered ["chronically homeless"](#). Ninety-eight households reported having no income whereas fifty-five households reported having at least one type of income.

### *Unaccompanied Youth and Families with Children and Youth*

Approximately 35% of homeless households in Billings included children and youth ([Homelessness and Housing Supports in Yellowstone County: A preliminary analysis](#)). Twelve service provider respondents from the City's HOME-ARP Survey reported family sizes ranging from one to four, with the exception being families served by the Bureau of Indian Affairs (BIA). The average family household size served by this agency was eight.

According to the 2019 PIT count, unaccompanied youth made up one out of every seven homeless households in Billings. One in twenty youth reported sleeping outside or in a place not meant for habitation. Like adult populations, the majority of unaccompanied youth in the 2020 PIT count reported being homeless four or more times within the last three years. Most unaccompanied youth indicated brief bouts of homelessness – more than one month, but less than three months.

In a [2019 Montana YRBS-Homeless Report](#), almost five percent of students were sleeping in places that were not a parent's or guardian's home. The majority of these students identified as Hispanic and/or American Indian / Native American, despite the fact that white, non-Hispanic youth make up [over 80% of the youth population in Montana \(U.S. Department of Justice\)](#). In Billings, similar trends existed; almost half of homeless students were American Indian / Native American and/or Hispanic. Additionally, half of all unaccompanied youth that were assessed for Coordinated Entry in Billings reported having a learning disability ([Homelessness and Housing Supports in Yellowstone County: A preliminary analysis](#)).

Eleven agency respondents to the City of Billings HOME-ARP Survey indicated serving unaccompanied youth. Tumbleweed, a Billings nonprofit assisting at-risk youth and young adults, reported serving the most individuals, 778 over the past twelve months. Tumbleweed also reported serving 22 unaccompanied youth individuals experiencing domestic and/or dating violence and 27 individuals fleeing or attempting to flee human trafficking.

### ***At-Risk of Homelessness as defined in 24 CFR 91.5***

A severe housing problem exists for households at-risk of homelessness. According to [2014-2018 CHAS Data](#), there were 3,275 renter occupied households and 1,785 owner occupied households earning between 0–30% of the Area Median Income (AMI). This is approximately 11% of all households in Billings.

Out of all the vacant-for-rent properties in Billings, there were none available that would have been considered affordable for earners falling below 30% AMI. According to the [City of Billings Five Year Consolidated Plan](#), approximately 75% of all renters with incomes less than 30% of the AMI are severely cost-burdened (paying more than 50% of monthly income towards housing).

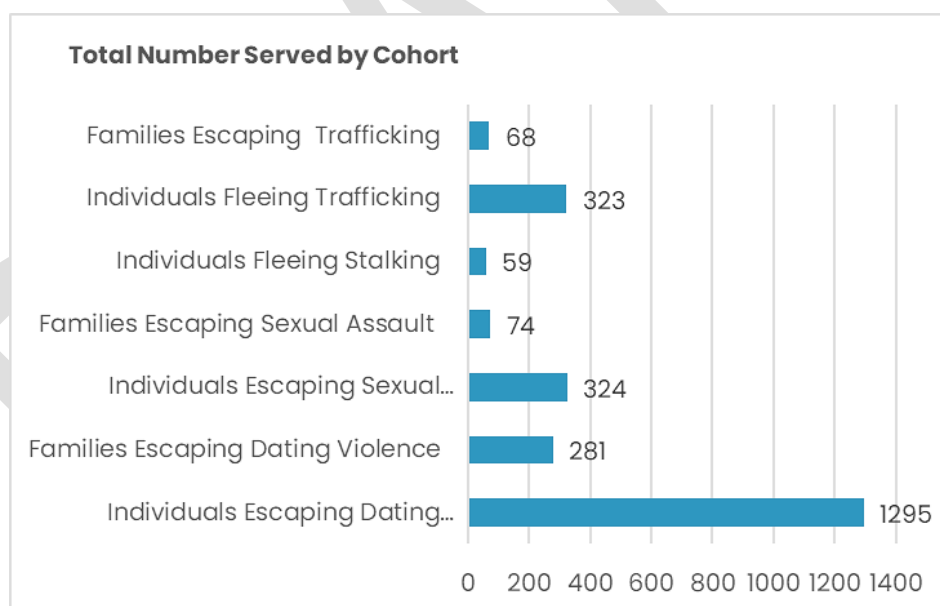
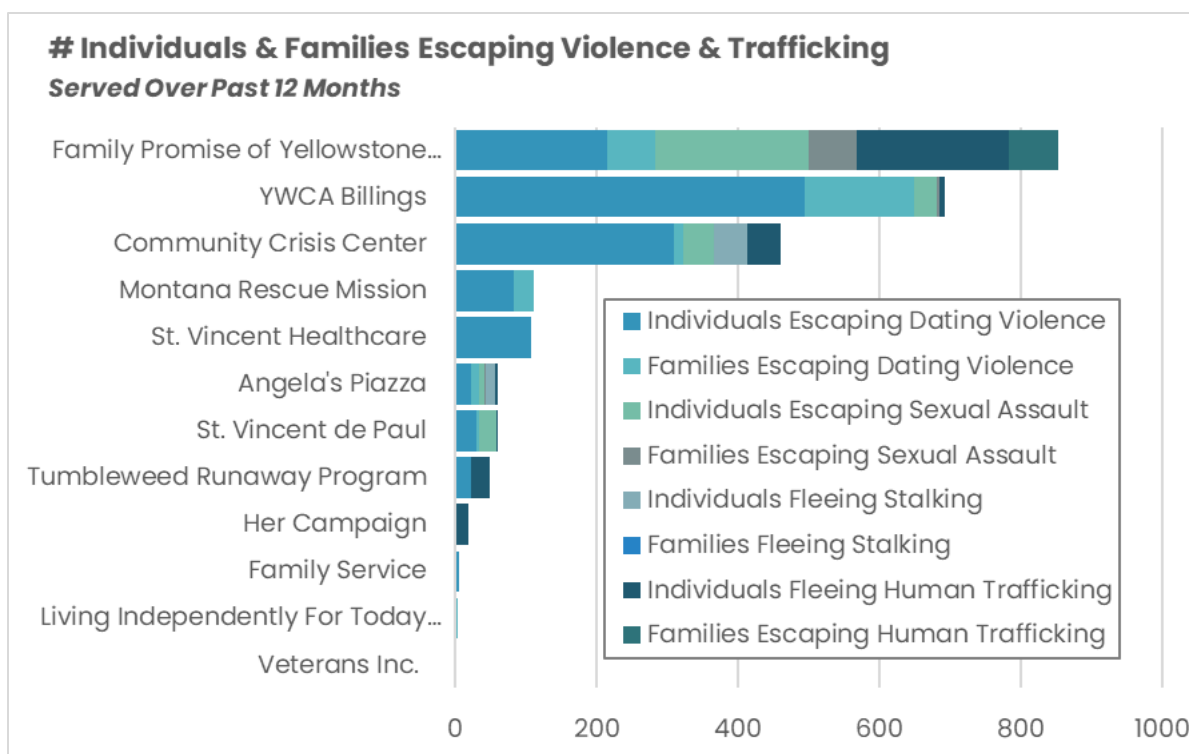
These factors only exacerbate the risk of homelessness, as households experiencing housing cost burden have fewer resources to cover the cost of other necessities. This data also exposes a lack of affordable housing options for this population.

### ***Fleeing, or Attempting to Flee, Domestic / Dating Violence, Sexual Assault, Stalking, or Human Trafficking***

The relationship between homelessness, domestic / dating violence, sexual assault, stalking, and human trafficking in Billings is significant. The [2020 Community Health Needs Assessment Report](#) indicated that over 20% of respondents had been a victim of domestic violence at least one time. The 2020 PIT survey counted 156 victims of domestic violence in the state, or 10% of the population.

The 2020 Billings Police Department Annual Report indicated that the number of investigations surrounding domestic violence issues has increased each year since 2017. In 2019, approximately 34% of Coordinated Entry individual assessments in Billings indicated exposure to at least one type of domestic violence. Billings' 2019 PIT count revealed that domestic violence issues were among the top reasons for housing barriers ([Homelessness and Housing Supports in Yellowstone County: A preliminary analysis](#)).

Twelve organizations from the City of Billings HOME-ARP Survey indicated they were serving community members in this qualifying population. Most people served were individuals escaping domestic / dating violence. People escaping sexual assault and human trafficking made up 33% of those served. In total, Billings agencies served 2,001 individuals over the past twelve months in this qualifying population. It is important to note that some individuals may have been reported more than once, as they may have identified as experiencing or fleeing multiple types of violence defined within this qualifying population (*City of Billings HOME-ARP Survey*). See charts following.



According to the National Human Trafficking Hotline Data Report ([Montana State Report For 2020](#)), the hotline received 462 substantive signals (e.g. text messages, phone calls, online tip reports, etc.) regarding human trafficking issues. Of those, 66% of signals came from victims of trafficking. This was the 22<sup>nd</sup> highest number of signals in the country. Most victims involved in human trafficking events were adult females. The Montana Department of Justice reported a [1,400% increase](#) in the number of human trafficking cases from 2015–2022.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice.***

Renters in Billings earning 50% or less of the AMI occupy approximately 6,750 housing units, or 40% of the total rentals, according to [2014-2018 CHAS Data](#). Of these households, 1,380 have at least one of four housing problems identified by HUD which include: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and housing cost burden. City staff anticipates that the number of households with a severe housing cost burden has increased since 2018 due to the economic results of the COVID-19 pandemic and rising housing costs in the area.



One important figure to note is that most households in Billings earning more than 80% of the HUD Area Median Family Income (HAMFI) are occupying a large portion of the housing units that fall within the affordability range for lower-income earners. This phenomenon also limits the number of units for households with annual incomes below 50% of the AMI and contributes to the number of households that experience housing cost burden.

***Veterans and Families that include a Veteran Family Member***

According to the [2021 Annual Homeless Assessment Report \(AHAR\) to Congress](#), between 2009 and 2021, the sheltered veteran homelessness population increased in only six states: Oregon (135 more sheltered veterans), Vermont (65), Idaho (62), New Hampshire (40), Rhode

Island (32), and Montana (27 more sheltered veterans). Montana also has one of the lowest rates of sheltered individuals with chronic patterns of homelessness, just under eight percent.

In January 2020, [165 veterans](#) were experiencing homelessness in the State of Montana; just under eleven percent of the total population. Billings is representative of this as well. According to the 2020 PIT Survey, 19 out of 167 households (11%) experiencing homelessness reported having at least one veteran family member.

Ten eligible veteran households accessed Rapid Re-Housing funds through the Supportive Services for Veteran Families (SSVF) program at Volunteers of American (VOA) in 2022.

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***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing.***

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Of the agencies that participated in the City's HOME-ARP Survey, individuals experiencing homelessness and individuals at-risk of homelessness were the most commonly served demographics. It is important to note that totals obtained from the City's HOME-ARP Survey may be duplicated, due to reporting variations and the fact that multiple agencies may have served the same individuals / families.

In 2018, Montana implemented a new Homeless Management Information System (HMIS) through [Pathways MISI](#) to carry out the activities for the Continuum of Care (CoC) including a Coordinated Entry System (CES). Community housing partners use HMIS and the CES to collect data relative to individuals and families experiencing barriers related to homelessness, increase housing access, maintain housing, and to meet HUD reporting requirements. In the City of Billings HOME-ARP Survey, eight organizations reported using HMIS regularly to obtain client-level data and assess housing needs and barriers. Eleven agencies reported active participation in CES Meetings. See *Appendix D*. This information will help determine organizational ability to carry out the HOME-ARP priority activities identified in this plan.

### ***Congregate and Non-Congregate Shelter***

The Community Crisis Center provides twenty-four-hour crisis intervention and congregate shelter for individuals. The center was created through a collaborative partnership of providers including SCL Health, Billings Clinic, the Mental Health Center, and RiverStone Health. There are 18 adult-only beds regularly available for individuals experiencing homelessness. Up to 20 [overflow / voucher beds](#) are also available.

Family Promise of Yellowstone Valley formerly provided congregate shelter beds for families. The shelter model is operated through the Interfaith Hospitality Network and includes

congregations that provide shelter, meals, and support to each family. Families also receive intensive case management services at Family Promise.

The Montana Rescue Mission (MRM) provides congregate and non-congregate shelter options and has 86 total beds for both individuals and families experiencing homelessness. MRM is in the process of building a "[Unified Campus Project](#)," which will increase the number shelter beds at their organization. The project will contain 50 beds for women and families and 76 beds for men. In September 2022, the City Council voted to provide MRM with approximately \$76,000 for administrative services and to enhance data entry through HMIS.

In September 2022, Billings City Council approved the use of public safety mill levy funds totaling \$210,000 to operate a low barrier emergency shelter for the year. The partnership between the Yellowstone County CoC, Community Crisis Center, and Billings First Congregational Church, "ShelterFirst," provides seasonal nightly shelter for up to 31 individuals, including families, through April 30<sup>th</sup>. The five-year strategic plan for the local CoC includes further infrastructure development with additional funding.

[YWCA Billings](#) operates an emergency shelter for single adults and households with children to quickly escape violent relationships. Gateway House has 12 family units, 35 family beds, and 2 adult-only beds in total. [In late 2021, the YWCA](#) opened a domestic violence shelter to serve the Crow and Northern Cheyenne Nations. The agency is also developing *Gateway Horizons*, which has 25 family units and 77 family beds available. [The YWCA Billings applied for funding through the 2021 Continuum of Care competition for this project.](#)

In addition to a Safe House, HER Campaign's emergency shelter can provide eight beds for survivors of sex trafficking for 30 to 90 days. The shelter serves women including trafficking survivors who are pregnant, have disabilities, and/or handicaps. A variety of advocacy services are also offered for survivors to facilitate a more permanent housing solution.

Angela's Piazza, a local agency advocating for and supporting victims of domestic violence, also reported providing non-congregate emergency shelter for nine individuals between October 2021 and October 2022.

### ***Supportive Services***

The City relies heavily on service providers as well as the local Continuum of Care and the Coordinated Entry System (CES) to provide supportive resources for qualifying populations within city-limits. According to the [United Way of Yellowstone County website](#), the following organizations are recognized as Key CoC Partners:

- Alternatives, Inc.
- Besaw Integrity Consulting
- Billings Clinic
- HomeFront
- City of Billings
- Community Crisis Center
- District 7 HRDC
- Downtown Billings Alliance



- Mental Health Center
- MT Dept. of Corrections
- Probation & Parole Division
- Mary Underriner
- Montana Rescue Mission
- Rimrock Foundation
- RiverStone Health
- St. Vincent Healthcare
- Tumbleweed
- Volunteers of America (VOA)
- YWCA
- St. Vincent DePaul
- Yellowstone County

Many of these agencies provide direct services for individuals and families experiencing homelessness including Rapid Re-Housing, case management, homeless services counseling, housing search assistance, mental health services, employment assistance, and life skills assistance. A full list of organizations / survey respondents reporting participation in the local CoC as of October 2022 can be found in Appendix D.

In 2019, over [\\$3.4 million was allocated](#) through HUD's Youth Homelessness Demonstration Program. [The plan](#) identified risk factors associated with the gaps in services for unaccompanied youth and outlined key steps to address these concerns. District 7 HRDC received \$102,580 as a renewal grant for the Youth Homeless Demonstration Project, ten percent of the overall \$1 million award.

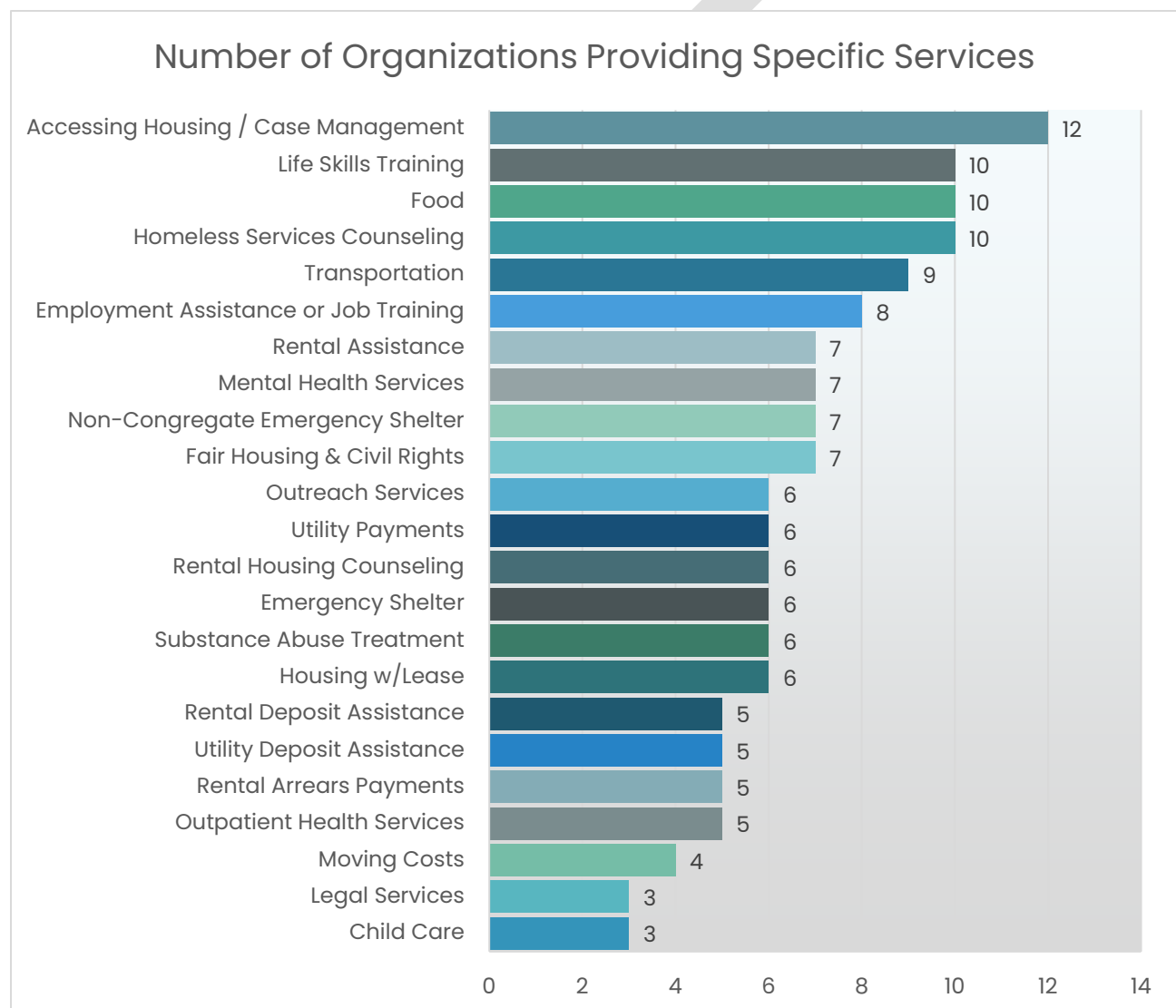
Various resources have been established to address the needs of people escaping violence and/or trafficking in Billings. YWCA's housing program provides a variety of support services at no charge. These include: shelter, 24-hour help lines, hospital accompaniment, case management, legal assistance, clinical services, advocacy, employment and training programs, financial empowerment and tuition assistance. A Housing Navigator coordinates services for survivors within the YWCA and with community partners.

Tumbleweed operates victim advocacy programs for youth in need of services to support victims with the development of life skills and to address barriers to medical and behavioral health, education, and employment.

The Yellowstone County Area Human Trafficking Task Force was formed in 2016 to evaluate needs related to trafficking and to advocate for survivors. It is comprised of over 800 representatives from 80 organizations. The Task Force meets once per quarter and is open to the public.

Supportive service assistance to prevent homelessness is provided at various local agencies. HRDC District 7 offers supportive service assistance through its Homeless Prevention program with the Emergency Solutions Grant (ESG). The Salvation Army can assist individuals and families with emergency rent assistance as well as motel and hotel vouchers. Family Service has limited funding for assistance with rent (if an eviction notice has been issued), utilities, and one-time funding for security deposits for individuals and families eligible for Section 8 housing.

In addition to serving individuals and families experiencing homelessness or at-risk of homelessness, agencies in Billings provide a variety of services for other qualifying populations. The Salvation Army offers supportive service assistance to individuals and families facing housing instability. This includes case management to address housing, childcare, legal, employment, and health barriers. NAMI provides mental health services. Other organizations provide substance abuse treatment, childcare, outpatient health services, employment assistance / job training, fair housing & civil rights training, food, life skills, and legal services. In the HOME-ARP Survey, the majority of respondents reported the provision of accessing housing / case management, life skills training, food, and homeless services counseling.



### ***Tenant-Based Rental Assistance (TBRA)***

Housing Choice Voucher (HCV) programs for eligible individuals and families in Billings are administered by the local PHA, HomeFront. According to HomeFront, 82% of HCVs were being utilized as of September 2022. Additional Local Preference vouchers for individuals and

families experiencing homelessness, domestic violence, and with family reunification needs also had an 82% utilization rate.

HRDC District 7 administers tenant-based, permanent rental and supportive service assistance through Rapid Re-Housing under the Emergency Solutions Grant (ESG). Up to 40 family units can be assisted with these funds. Unaccompanied, parenting youth may be eligible for transitional housing at Harmony House through HRDC District 7. Residents can receive transitional living support for up to 18 months as well as aftercare services for an additional 6 months. There are five family units and twenty total beds available through this program.

Family Promise of Yellowstone Valley offers transitional living spaces for 12 families, a total of 30 family beds.

HER Campaign opened a transitional housing project in May 2021. The program can serve four women and/or women with children for up to two years. During this time, women are provided with one-on-one support to build skills working towards financial independence.

Beginning in 2021, the Montana Department of Commerce (MDOC) issued Emergency Housing Vouchers (EHVs) through a direct referral program with the Montana Continuum of Care Coalition. EHV referring agencies in Billings are HRDC District 7, United Way of Yellowstone County, and YWCA Billings.

Volunteers of America (VOA) provides rapid re-housing services through Supportive Services for Veteran Families (SSVF) in Billings. SSVF in Billings has seven family units and ten beds in total. The VOA also operates Independence Hall, a transitional housing program for adult males with 20 beds.

### ***Affordable & Permanent Supportive Rental Housing***

[HomeFront](#) owns and operates seven affordable rental housing developments in Billings. HomeFront also operates affordable public housing rentals, rentals for individuals over 62, and for individuals with disabilities. They also manage the city's Housing Choice Voucher (HCV) program. Over 3,000 residents are currently served through HomeFront programming in Billings.

The MRM Unified Campus project plans to add six transitional housing units and 23 supportive housing apartments. The rentals will be reserved for individuals and families earning less than 60% of the AMI.

In 2018, YWCA Billings opened a low-income housing tax credit property, Gateway Vista. This two-story, 24-hour secured facility has twenty-four apartments and gives preference to Gateway Shelter residents and other victims of domestic violence and human trafficking. Residents have access to counseling and case management, and YWCA's 24/7 help lines

where 4,775 callers were assisted in the last year. Gateway Vista Apartments are based on a percentage of area median income.

Rental housing options in Billings appear to be limited compared to the number of families in the area that are income eligible. The following properties are considered affordable housing options:

- Aspen Grove Senior Subsidized Apartments
- Magic City Terrace (Volunteers of America)
- Sunrise Manor
- Fraser Tower
- South Forty Apartments
- Ponderosa Acres
- Sage Tower
- Western View Apartments
- Big Sky Apartments
- Rose Park Plaza
- Grand View Apartments
- Prairie Tower Apartments

Both Permanent Supportive Housing and Transitional Housing options exist in Billings for Veterans. Permanent Supportive Housing through the HUD-Veterans Affairs Supportive Housing (VASH) is operated by HomeFront in Billings. As of September 2022, 87% of HUD-VASH vouchers were being utilized. A total of 106 beds are available through VASH. At VOA, 20 transitional housing beds at Independence Hall are reserved for single, adult males, whereas Rapid Re-Housing through SSVF can support seven veteran family units. A summary of shelter and housing inventory can be found in Appendix C.

### ***Describe the unmet housing and service needs of qualifying populations.***

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People experiencing homelessness experience higher rates of morbidity and mortality as the social determinants of health are greatly affected by lack of safe, affordable, and accessible housing ([Tackling Health Disparities for People Who Are Homeless, National Library of Medicine](#)). Solving the issue of homelessness is complicated and requires a highly dedicated amount of time, investment, and resources. It is necessary that people experiencing issues related to homelessness have access to, and knowledge of, services in order to combat these barriers.

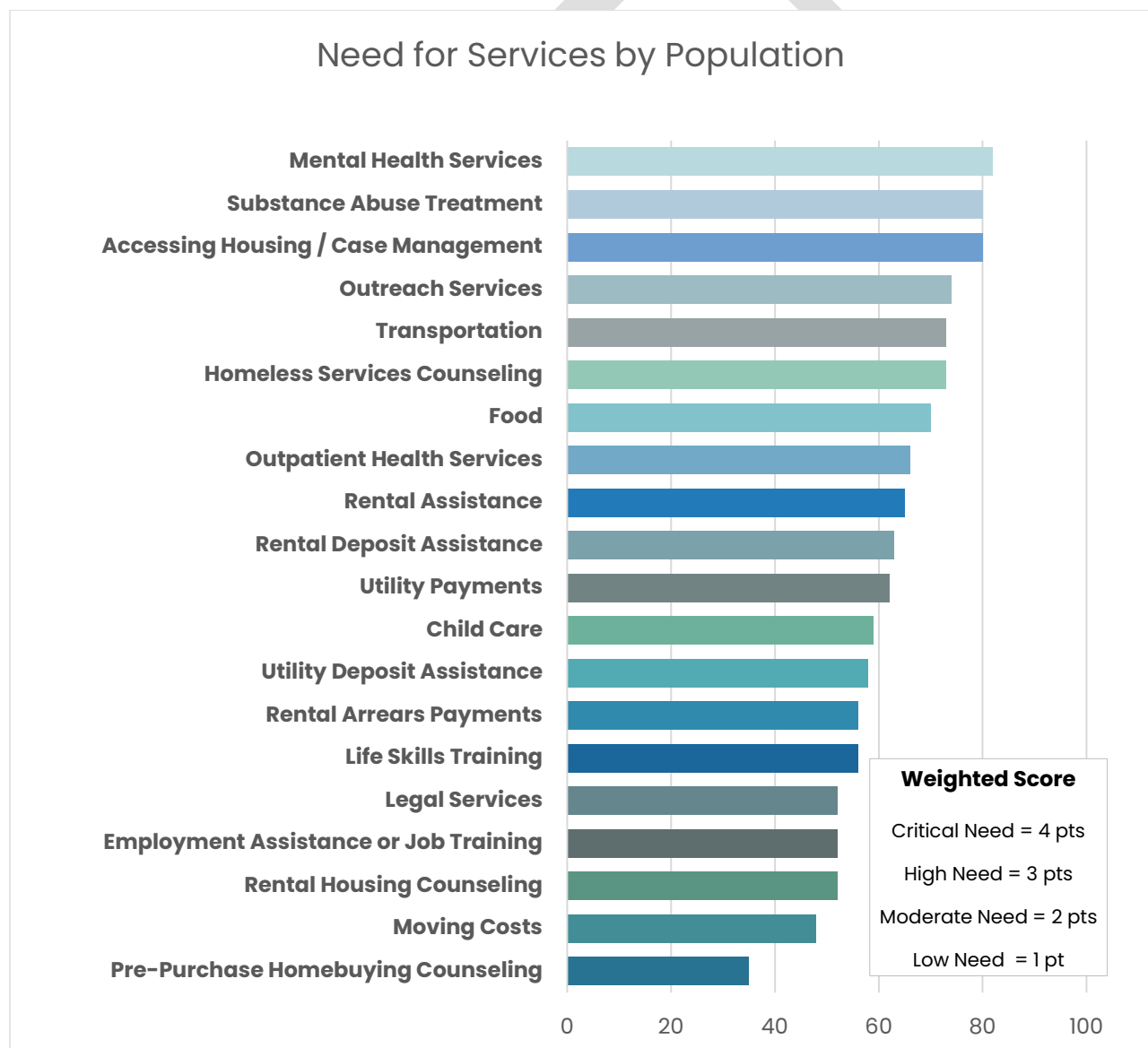
[The HRDC District 7 2020 Community Needs Assessment](#) reported that the top five services that households most need but don't know how to access were: low-income housing or rental payment assistance; utility payment assistance; transportation; minor home repair or weatherization services; and employment and training. Additionally, when respondents were asked to provide details regarding the most important issues, they had faced within the past twelve months, the highest ranked responses were affordable health care, safe affordable housing, and access to living wage jobs. Following these were barriers related to transportation, childcare, and food. These unmet service needs closely resemble the responses from service providers through the City's HOME-ARP consultation process.

In 2021, the City of Billings utilized CDBG-CV (Community Development Block Grant – CARES Act) funding for supportive services in response to the coronavirus pandemic. The City formed agreements with several non-profit organizations in Billings to provide services detailed in the [Coronavirus Initiative Report](#) assessment. From July 2021 – June 2022, over 1,900 households with incomes below 30% AMI were served, or 87% of all beneficiaries. These funds have since been allocated and mostly expended.

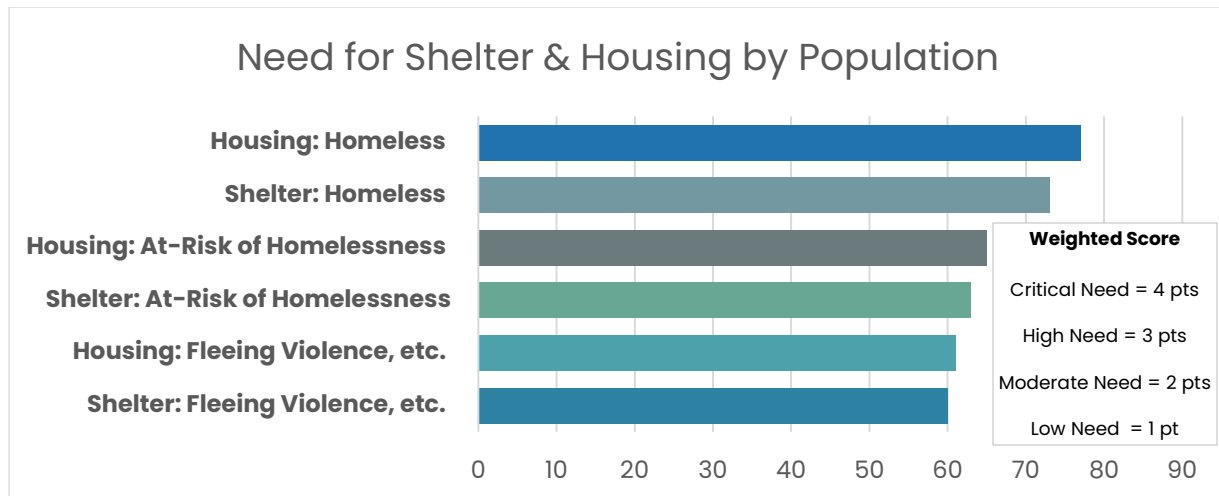
According to the [City of Billings' Consolidated Plan](#), HomeFront has over 4,400 single person households earning 0-30% of AMI on waiting lists for housing options. During the HOME-ARP consultation process, HomeFront reported that the combination of low rental inventory available and sky-rocketing rental costs has become the most significant issue for people that receive housing vouchers, but unable to secure housing, and therefore remain on waiting lists. As of September 2022, there were 177 vouchers that had been issued to families searching for housing that had not yet been utilized.

At present, the number of affordable and permanent supportive housing options in Billings is not sufficient to meet the needs of the current population. With both little inventory and low vacancy rates for affordable units, all qualifying populations are experiencing hardships when it comes to obtaining and maintaining housing. For homeless individuals, there is currently a lack of adult-only shelter beds available in Billings.

According to the City of Billings HOME-ARP Survey, the three highest ranked needs for services for all qualifying populations were mental health services, substance abuse treatment, and accessing housing / case management. With limited funding and an increasing need for services that address these barriers, the provision of supportive services is a priority in Billings. Agencies also ranked housing and shelter needs for each qualifying population. Rental housing for those experiencing homelessness was identified as the most significant unmet housing need.







In addition to ranking needs for qualifying populations, survey respondents were asked to provide comments regarding unmet housing and service needs for each qualifying population. The results are as follows:

#### **Homeless as defined in 24 CFR 91.5**

For individuals and/or families experiencing homelessness, social service agencies indicated that the most common unmet needs were access to various types of affordable housing, lack of shelter options, and lack of case management, and health services.

- *"Outreach on the streets; case management; 24 hour low barrier shelter options ; permanet [sic] supportive housing; harm reduction care and services, no services should EVER be dependent on participation in religious activity"*
- *"Not adequate space at MRM or Family Promise for larger families. Individuals who can't meet their ADL's - can't get into assisted living / mental hospital. Need caregivers in motel room. Money to pay off old credit companies - rent, damages, and utilities. Substance abuse treatment options for those who have severe mental health diagnoses with no active treatment."*
- *"Overnight shelter, both low barrier and other as well as non-congregate care, mental health and Substance use disorder txmt [sic], case management, wrap around services, supportive and/or transitional housing, Social Support"*
- *"During Q2 of this year, we assessed and provided some sort of services for 756 literally homeless adults. Of this, existing case management can prioritize no more than 160 people at any given time."*
- *"Lack of affordable accessable [sic] housing"*
- *Lack of affordable housing and lack of permanent supportive housing and services. High cost to move in (ex. security deposit 3 months rent). High cost of utilities. Lack of financial and credit counseling assistance. Lack of CORI friendly housing.*

- *"access to affordable housing"*
- *"case management and service coordination among providers; child care; transportation"*
- *"Permanent Supportive Housing for the highest utilizers of services. This is housing with supportive services attached to keep people stabilized."*
- *"Affordable housing, emergency shelter, rental assistance"*
- *"insufficient family income"*
- *"Unmet service needs include immediate, accessible and affordable housing. This includes emergency shelter such as low barrier shelter. Another unmet need is housing that is manageable and affordable by tenants with limited ability to manage their own home. This population includes mentally and physically disabled adults who cannot or do not qualify for other housing programs. Low barrier shelter and supportive housing are the greatest unmet needs for this population."*
- *"Transitional housing while persons awaiting treatment"*
- *"Adequate, available, affordable housing; access to mental health care"*

### *Unaccompanied Youth*

- *"Same as above; life skills training; drivers training; mentorship programs; safe places to be a child, teen, and young adult; children should NOT be expected to act as and perform adult behavior 24 hours a day; no services should EVER be dependent on participation in religious activity"*
- *"Overnight shelter, both low barrier and other as well as non-congregate care, mental health and Substance use disorder txmt [sic], case management, wrap around services, supportive and/or transitional housing, Social Supports"*
- *"There is an extreme shortage of case management for this population, among all other literally homeless clients we serve. We also need outreach and overnight drop-in care or emergency shelter specifically for youth"*
- *"Life skills training, substance abuse training, and suicide prevention."*
- *"Lack of rental/credit history to move into housing."*
- *"case management and service coordination among providers; child care; transportation"*
- *"Transportation"*
- *"Affordable housing, emergency shelter, rental assistance"*
- *"insufficient resources"*
- *"Unmet service needs include immediate, accessible and affordable housing. This includes emergency shelter such as low barrier shelter. Another unmet need is housing"*

*that is manageable and affordable by tenants with limited ability to manage their own home. This population includes mentally and physically disabled adults who cannot or do not qualify for other housing programs. Low barrier shelter and supportive housing are the greatest unmet needs for this population."*

- *"A tolerant family and community – LGBT youth are too often kicked out of their family"*

### ***At-Risk of Homelessness as defined in 24 CFR 91.5***

For individuals and/or families at-risk of homelessness, social service agencies indicated that the most common unmet needs were affordable housing options, financial assistance related to housing, case management, and supportive services to cover costs such as childcare and transportation.

- *"Supportive services designed to prevent homelessness; child care; reliable public transportation for shift work; rental and utility assistance; no services should EVER be dependent on participation in religious activity"*
- *"Rental Assistance, Life Skills, Budgeting, Employment Training, case management, wrap around services, Social Supports"*
- *"Case management, Case management, Case management. I cannot emphasize this enough. Second to this is outreach with transportation coming in third"*
- *"Life skills training and budgeting."*
- *"Lack of affordable housing and financial supports."*
- *"preventative services"*
- *"case management and service coordination among providers; child care; transportation"*
- *"Low inventory of affordable housing that is also safe. Affordable, quality childcare and before and after school care. Transportation."*
- *"Affordable housing, emergency shelter, rental assistance"*
- *"rental qualifications, large downpayments, high rental rates"*
- *"Transitional housing"*
- *"Public transportation at night"*

### ***Fleeing, or Attempting to Flee, Domestic / Dating Violence, Sexual Assault, Stalking, or Human Trafficking.***

For individuals and/or families fleeing or attempting to flee, domestic / dating violence, sexual assault, stalking, or human trafficking, social service agencies indicated that the most

common unmet needs were lack of shelter options, affordable housing, and other supportive services including mental health care and legal services.

### *Domestic / Dating Violence*

- *"SAFE and secure housing; cell phones with new numbers; legal assistance and protection of public information; SAFE child care; healthcare and financial counseling [sic]/aid; clothing assistance; trauma care; no services should EVER be dependent on participation in religious activity; SAFE space and TIME to work through the healing process"*
- *"Not enough space at YWCA shelter. Those placed in a motel can't necessarily be kept safe. Community training for best practices."*
- *"Specific and Separate Shelters, Ability to house pets, Mental Health and Trauma informed care, Non-congregate shelter"*
- *"Victim advocacy, resources for temporary shelter, and victim counseling."*
- *"YWCA Billings services are at capacity. The opening of Gateway Horizons will alleviate some of the shelter shortage but I believe we will still be unable to serve everyone who needs it. Additionally, it is almost impossible to find affordable, safe housing that is accessible to hard to rent populations [sic]."*
- *"Lack of DV shelters, lack of space for nontraditional groups fleeing."*
- *"Mental health services - legal services"*
- *"Affordable housing, emergency shelter, rental assistance"*
- *"insufficient resources for healing"*
- *"Adequate, available, affordable housing"*

### *Sexual Assault*

- *"Need an advocate / counselor / transport. Community training for best practices."*
- *"Specific and Separate Shelters, Ability to house pets, Mental Health and Trauma informed care, Non-congregate shelter"*
- *"Victim counseling and a safe place while fleeing."*
- *"Lack of DV shelters, lack of space for nontraditional groups fleeing."*
- *"Mental health services - legal services"*
- *"Affordable housing, emergency shelter, rental assistance"*
- *"Insufficient resources for healing"*
- *"Adequate, available, affordable housing; access to mental health support"*

## Stalking

- *"Not enough space at YWCA shelter. Those placed in motel through MERA cannot be protected. Community training for best practices."*
- *"Specific and Separate Shelters, Ability to house pets, Mental Health and Trauma informed care, Non-congregate shelter"*
- *"victim education for cyber bullying and Victim counseling and a safe place while fleeing."*
- *"Lack of DV shelters, lack of space for nontraditional groups fleeing."*
- *"Mental health services – legal services"*
- *"Affordable housing, emergency shelter, rental assistance"*
- *"insufficient resources for protection"*
- *"Law enforcement that take this seriously"*

## Human Trafficking

- *"SAFE transportation to a different city or state; advocate assistance throughout legal/court process; legal protection from criminal charges; restitution"*
- *"Peer mentors that can provide immediate transport. Community training for best practices."*
- *"Specific and Separate Shelters, Ability to house pets, Mental Health and Trauma informed care, Non-congregate shelter"*
- *"Victim education and counseling, community education and partnerships within the community."*
- *"We need low barrier, immediate short-term (3-5 day) placement option for survivors exiting the life. Trauma, other mental health problems, flight or fight response to an abusive life, drug dependency, sleep deprivation, and many more factors demand that each Survivor exiting the life of trafficking get a few days to rest and think about their next step in life before making a life decision under the influence of a grave need to survive."*
- *"Lack of DV shelters, lack of space for nontraditional groups fleeing."*
- *"Mental health services – legal services"*
- *"Affordable housing, emergency shelter, rental assistance"*
- *"insufficient support during legal proceedings and after"*
- *"Adequate, available, affordable housing; access to mental health support; follow through on capturing the trafficker"*

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice.***

For individuals and/or families requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, social service agencies indicated that the most common unmet needs were lack of affordable housing, rental assistance, supportive services for substance abuse treatment and life skills, and case management.

***Individuals or Families Requiring Services or Housing Assistance to Prevent Homelessness***

- *"Mortgage assistance through MERA is a loan and very difficult to acquire. Provide less requirements and one-time free assistance rather than a loan."*
- *"Rental Assistance, Life Skills, Budgeting, Employment Training, case management, wrap around services, Social Supports"*
- *"This is an area where we have quite a bit of assistance, but it is often hampered by so many funding requirements that it can be difficult to utilize. Unrestricted funds would help case managers find creative solutions for Housing Problem Solving"*
- *"Child care resources/ options, transportation, adapting back to workforce."*
- *"Lack of affordable housing, high cost of living, lack of financial resources including employment opportunities"*
- *"Mental health and other supportive services that can be accessed easily any time of the day or night"*
- *"Affordable housing, emergency shelter, rental assistance"*
- *"rental qualifications, credit scores, high rental rates, low availability"*
- *"Adequate, available, affordable housing"*

***Individuals or Families At Greatest Risk of Housing Instability***

- *"Increase access to mental health, DV, substance abuse treatment. Money doesn't solve the problem. They need supportive services w/easy access."*
- *"Social Supports, Life Skills, Budgeting, job training, child care, intensive case management, wrap around services for entire family"*
- *"Have I mentioned case management? We could also use care coordination teams with members strategically placed to fill gaps within the homeless crisis response system"*

- *"Lack of affordable, accessible [sic] housing and renters education."*
- *"Lack of affordable housing, high cost of living, lack of financial resources including employment opportunities."*
- *"Low inventory of affordable housing that is also safe. Mental health support that can be accessed easily any time of the day or night. Affordable quality childcare, before and afterschool care."*
- *"Affordable housing, emergency shelter, rental assistance"*
- *"insufficient resources for income, housing"*
- *"Adequate, available, affordable housing"*

### *Veterans and Families that include a Veteran Family Member*

- *"Integrated [sic] health and behavioral care; permanent supportive housing when needed; wrap around services at all levels"*
- *"Services for those who are not income qualified by who have had a major life event or disaster."*
- *"Specific Services like VOA and Independence Hall (need a second shelter for female veterans who are homeless), long term case management"*
- *"Traumatic Brain Injuries, PTSD, medication management, holistic relief. Aside from this, we work well with local veteran service providers and defer to them on the best way to meet any unmet need in this category"*
- *"Budgeting education, more affordable housing."*
- *"Lack of Veteran focused providers such as Veterans Inc. Lack of funding to support all homeless veterans during a housing crisis with minimal financial resources."*
- *"Mental health services"*
- *"Affordable housing, emergency shelter, rental assistance"*
- *"insufficient resources for housing, medical"*

**Identify any gaps within the current shelter and housing inventory as well as the service delivery system.**

Table One indicates a significant gap exists between the number of individuals and families experiencing homelessness or at-risk of homelessness compared to the number of available affordable housing units for these populations.

Table One: Non-Homeless Housing Needs Inventory and Gap Analysis Table			
Categories	Current Inventory	Level of Need	Gap Analysis
	# Units	# HH	# HH
Total Occupied and Vacant Rental Units	18,075		
Occupied and Vacant Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,920		
Occupied and Vacant Rental Units Affordable to HH at 50% AMI (Other Populations)	5,255		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,380	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,105	
Current Gap for HH at 30%			(460)
Current Gap for HH between 30% and 50%			4,150
Data Sources: CHAS <a href="#">2018 Five-Year Data by Place</a>			



Data (*Table Two*) indicates the number of beds and units, when combined, are adequate to provide shelter and housing to families, but a significant need for the development of 272 units or 311 beds for individuals. A gap exists between the number of Adult-Only beds in emergency shelters and transitional housing units versus what is needed. Currently, permanent supportive housing units in Billings exist for individuals or families with veteran status and those fleeing or attempting to flee domestic violence and/or human trafficking. An updated version of housing inventory with staff input can be found in Appendix C.

Table Two: Homeless Needs Inventory and Gap Analysis Table

Housing Type	Current Inventory					Homeless Population						Gap Analysis			
	Family		Adults Only		Veterans	# Family Members	Family HH (≥ child)	# Adults	Adult HH (w/o child)	Veterans	Victims of Domestic Violence	Family		Adults Only	
	# Beds	# Units	# Beds	# Units	# Beds							# Beds	# Units	# Beds	# Units
Emergency Shelter	52	19	88	88	0										
Transitional Housing	40	9	0	0	20										
Permanent Supportive Housing	0	0	0	0	90										
Other Permanent Housing						NA	NA	NA	NA	NA	NA				
Sheltered Homeless						48	27	171	152	22	24				
Unsheltered Homeless						33	4	228	208	NA*	NA*				
Totals	92	28	88	88	110	81	31	399	360	22	24				
Current Gap												11	(3)	(311)	(272)

Data provided by Montana Continuum of Care, November 2021 via Bob Buzzas and Christopher Sage, PCNI.org

\* The last unsheltered count was observational due to the pandemic. Veteran status and DV were not observed.

While a need for additional shelter beds for adults exists, the development of [MRM's Unified Campus Project](#) and [YWCA's Gateway Horizons](#) will add over 230 beds to help close this gap. Both of these organizations serve a significant number of people experiencing homelessness each year, so these improvements will be greatly impactful for the community. At this time, using HOME-ARP funds to provide supportive services and address housing instability for all qualifying populations in Billings appears to outweigh the need for developing shelter units.

The City of Billings is also included in a statewide Continuum of Care. Year after year, the Montana Continuum of Care has prioritized and allocated a vast majority of HUD's Continuum of Care funding for renewal programs benefiting organizations in western Montana. This leaves very little funding for new projects in Billings. In 2021, over 80 percent of the \$3.26 million was dedicated to renewal and reallocation projects.

Since 2005, organizations located in Billings were directly allocated seven percent of the near \$40 million allocated through the Montana Continuum of Care (\$2.88 million). Organizations in Missoula were allocated 40 percent of the Continuum of Care's funding (\$15.8 million). Organizations in western Montana receive most of the allocations; agencies within 120 miles of Missoula received 73 percent (\$29 million) of the funding.

[The Montana Census and Economic Information Center \(CEIC\) released data](#) analyzing ACS 5-Year Data. In 2019, Billings had the highest percent of occupied housing units in the state. The vacancy rate for rentals hovered at around 7% in 2019. In 2021 [Billings was rated the number one city](#) in the Wall Street Journal's Emerging Housing Markets Index. This type of national attention likely led to an influx of people moving to Billings and therefore driving up housing costs. [In June 2021, the average price for a single-family home had increased by 32% since the previous year.](#)

Rental prices have also continued to increase. According to ACS 5-Year Estimate data, Billings's [median gross rent was \\$965 \(U.S. Census Bureau QuickFacts\)](#) from 2017 – 2021. Fair Market Rent (FMR) for Billings is now over \$1,000 per month for a two bedroom unit, [the fourth highest in the state](#). The increasing cost of housing leaves the options limited for community members in need of more affordable housing. The financial strain on individuals and families is also significant, as the ability to remain in a stable housing situation becomes increasingly difficult.

As of January 20, 2023, the Montana Department of Commerce is no longer accepting new applications for [the Montana Emergency Rental Assistance \(MERA\) program](#). According to the State of Montana, over 12,000 Montana households received assistance for future and past due rent, past due and future utilities since 2021.

For eligible individuals and families fleeing or attempting to flee violence and/or trafficking, YWCA's Housing Navigator is a key resource; however, not all survivors will be able to receive financial assistance for housing because of limited resources.

In the City of Billings HOME-ARP Survey, organizations were asked to identify whether they maintain a waiting list for each type of service they provide. Respondents indicated that the majority of time spent on a waiting list for services in Billings is one week or less. However, regarding housing and shelter needs, most individuals and families are on a waiting list for approximately three months. Wait time for financial assistance (including rental and deposit assistance) was averaged at three months, the highest wait time for any of the supportive services.

Despite there being a variety of services available to assist qualifying populations, funding is not currently sufficient to meet the need. More affordable housing and expanded funding for services is crucial to addressing the gaps in housing and service delivery in Billings.

***Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of "other populations" as established in the HOME-ARP Notice.***

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The City does not intend to further define 'other populations' beyond what is established in the HOME-ARP Notice.

***Identify priority needs for qualifying populations.***

---

The provision of supportive services is a clear priority need for all the qualifying populations. Supportive services related to health (including mental health and substance abuse treatment) were the highest ranked needs for all qualifying populations in the City of Billings HOME-ARP Survey. Additionally, accessing housing / case management, outreach services, transportation, food, and outpatient services were among the highest priority needs for individuals and families experiencing homelessness, at-risk of homelessness, and other populations. The Yellowstone County CoC also recommended that the City consider using HOME-ARP funding for supportive service needs, especially case management and care coordination teams to fill the gaps within homeless crisis response.

The highest ranked housing need was for rental housing for households experiencing homelessness. The City recognizes that a lack of affordable housing for qualifying populations in Billings is a significant issue. The City determined that providing Supportive Services with HOME-ARP funds and encouraging affordable housing development through current programming will maximize funding benefits, increase long-term sustainability of housing developments, and most effectively benefit all qualifying populations.

***Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined.***

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Quantitative data sources include the 2014–2018 Comprehensive Housing Affordability Strategy (CHAS), 2019 and 2020 American Community Survey (ACS), 2019 and 2020 Point-In-Time counts through the Montana Continuum of Care, and some analysis of the Coordinated Entry System (CES) in Billings. The City relied heavily on the consultation process and other community assessments to fill in gaps in the available quantitative data and to better understand agency services, gaps, and needs. The City reviewed the number of organizations serving the qualifying populations and their current capacity as well as how the organizations are funded. Through this information, the City determined that a need for more affordable rental housing inventory, permanent supportive housing, and the provision of expanded supportive services are crucial to address unmet needs and bridge gaps in services.

## HOME-ARP Activities

### ***Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors.***

---

The development of funding application materials and applicant eligibility criteria will be undertaken during HUD's review of the City's HOME-ARP Allocation Plan. The City will hold an open application process following HUD's approval of the HOME-ARP Allocation Plan. Any developer, service provider, subrecipient and/or contractor may apply. Following the application deadline, all applications received will be reviewed for completeness, eligibility, and an applicant's ability to provide services based on the priorities identified within the allocation plan. The City will also consult with Montana Fair Housing to ensure procedures are in place so that applicants convey compliance with fair housing, civil rights, and nondiscrimination requirements during preference implementation.

Funding allocations for selected applicants will be finalized following the City's review of the applicant's project scope regarding how well it meets the prioritized needs and gaps as identified, as well as their ability to carry out activities as outlined in the federal requirements.

### ***Describe whether the PJ will administer eligible activities directly.***

---

The City proposes that selected applicant(s) administer selected activities; the City will monitor the applicant(s) / subrecipient(s).

### ***If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all the PJ's HOME-ARP program.***

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Administrative funds were not provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

**PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.**

Use of HOME-ARP Funding			
Service	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$1,029,623		
Acquisition, Development of Non-Congregate Shelter	\$0		
Tenant-Based Rental Assistance	\$0		
Development of Affordable Rental Housing	\$0		
Non-Profit Operating	\$0	0%	5%
Non-Profit Capacity-Building	\$0	0%	5%
Administration and Planning	\$181,698	15%	15%
Total HOME-ARP Allocation	\$1,211,321		

**Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:**

In accordance with its FY2020–2024 Consolidated Plan, the City manages its activities and programs on the basis of timely community need. Types of applications for funding may vary based on changing community resources and needs throughout the expenditure period; however, the City expects that funding will be allocated to address the overall needs and gaps as discussed in its Allocation Plan.

The City proposes to fund Administration and Planning at the full amount (15% of the total HOME-ARP funding amount). These funds will allow City Staff to execute duties related to the program efficiently including program management, coordination, monitoring, and evaluation. Funding must also be sufficient to operate and monitor the HOME-ARP program and any subrecipient(s) through the expenditure deadline of September 2030.

The City will distribute the remaining 85% of the total funding award through Supportive Services to supplement programs that currently exist and/or other projects that are eligible to take on this activity through a written agreement with the City. Through its gap analysis, the City identified that the number of households in need of services to secure and maintain housing in all qualifying populations is significant. Providing supportive services to qualified households will help close the gap on several priority needs identified by both residents and providers in Billings.

***Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities.***

---

The needs assessment revealed that households considered homeless, at risk of homelessness, requiring services or housing assistance to prevent homelessness, and/or other populations at greatest risk of housing instability need ongoing assistance and supportive services to secure and maintain affordable housing options. Limited resources, provider identified needs, and wait times for this type of support provided a rationale for funding these activities. Because financial assistance for rental applications, deposits, utility payments, etc. and short / medium-term financial assistance for rent are also eligible services, the City expects these types of needs can also be successfully met.

The gaps analysis identified the need for more affordable rental housing and shelter beds for homeless individuals; however, the City does not propose the acquisition / development of non-congregate shelter, or the development of affordable rental housing using HOME-ARP funds. The total allocated funding amount does not lend itself to the production of more than three units without a significant amount of additionally leveraged funds. Considering the restricted use period of up to fifteen years, and that only a few households could potentially benefit, undertaking these activities is not considered an effective use of HOME-ARP funds to address this gap within the expenditure period in the Billings community.

To serve all qualifying populations, the City determined that Supportive Services will most effectively address the unmet needs and service gaps that currently exist in Billings. The City can ensure that households within all of the qualifying populations will benefit from this funding use. The City also recognizes that housing and shelter needs for those experiencing homelessness is a community need. To ensure residents in all qualifying populations have increased access to services, and to support community housing needs, the City will continue to support the development of rental housing and/or shelter through existing programming. The City Council has prioritized the allocation of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds to address this need. Agencies can apply at any time through the Affordable Housing Development program at [billingsmt.gov/AHDinfo](http://billingsmt.gov/AHDinfo).

## HOME-ARP Production Housing Goals

***Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation.***

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The City of Billings will not be proposing the production or support of additional affordable rental housing units with HOME-ARP funds.

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs.***

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The City of Billings does not have an affordable rental housing production goal that will utilize HOME-ARP funds.

## Preferences

*A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A method of prioritization is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.*

- *Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).*
- *The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.*

***Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.***

---

The City's needs assessment and gaps analysis demonstrated a considerable lack of affordable housing options, especially for homeless and at-risk households; however, the need for various supportive services were identified as critical for all qualifying populations. Because the City proposes that HOME-ARP funds be allocated to supportive services and not for the development of additional housing or shelters, financial assistance for all qualifying populations is essential. The expanded provision of services for all populations will address the unmet needs and gaps identified by service providers, therefore the City will not implement a preference for any qualifying populations or subpopulations.



Because of the open and competitive application process, the City expects funding applications to vary. The City will ensure that applicants verify that they serve individuals and/or families that meet the criteria for at least one or more of the qualifying populations. As noted previously, the City may implement and advertise an additional application process to ensure all qualifying populations benefit and to ensure all needs and gaps for all qualifying populations are addressed.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

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N/A.

## **HOME-ARP Refinancing Guidelines**

*If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project.*

The City of Billings does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

## Appendices

- A. City of Billings HOME-ARP Survey
- B. Mayor's Letter of Support – City of Billings HOME-ARP Survey
- C. Billings Housing & Shelter Inventory
- D. Survey Charts
- E. Affidavits of Publication – Notice of Public Hearings
- F. Public Outreach Attendance Lists
- G. Public Comments

## Appendix A : City of Billings HOME-ARP Survey

### HOME-ARP Service Provider Survey



**Background:** The City of Billings has been allocated about \$969,000 from the U.S. Department of Housing & Urban Development (HUD) through the HOME Investment Partnership Program (HOME) as part of the American Rescue Plan (ARP). HOME-ARP funding must benefit individuals and families who are homeless, at risk of homelessness, and in other vulnerable populations to reduce homelessness and increase housing stability within the Billings city limits. There are four eligible activities:

- Production or Preservation of Affordable Housing
- Tenant-Based Rental Assistance (TBRA)
- Supportive Services, Homeless Prevention Services, and Housing Counseling
- Purchase and Development of Non-Congregate Shelter

This survey was designed to gather data to help determine priorities for a coordinated HOME-ARP response within the Billings community. Please be as accurate as possible in your responses, as community need must be established prior to funding allocation. If the organization served an individual or family more than one time in the past 12 months, please count that individual / family only ONCE. **Please complete this survey by November 14, 2022.**

You may either complete this paper survey and return it by US mail, complete the survey online at [https://www.surveymonkey.com/r/HOME-ARP\\_Billings](https://www.surveymonkey.com/r/HOME-ARP_Billings), by clicking the link at <https://www.billingsmt.gov/2989/HOME-ARP-American-Rescue-Plan>, or scan the QR code at right to complete the online survey on a computer, tablet, or smartphone. If you need assistance, please contact the Billings Community Development Division at (406) 247-8675.



Organization Name:			
Contact Name:		Job Title	
Contact Email:		Phone Number	(    )

Please ensure the information provided below is representative of verifiable backup documentation and data for the organization.

1. Is your organization interested in accessing HOME-ARP funding?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure
2. Does your organization have strategic plans, annual reports, or other materials that provide information about program services and outcomes?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please describe materials your organization has about program services and outcomes AND if they are available for review.	
3. Does your organization solicit feedback from populations served? (e.g., client or participant satisfaction surveys)	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please describe the feedback solicitation methods used AND if they are available for review.	

4. Please enter the total unduplicated number of people the organization served in the <b>PAST 12 MONTHS</b> for each of the following populations. Also identify average household size. <i>BLUE CAPS indicate HOME-ARP "qualifying populations"</i>	# Individuals (single person household)	# Families	Average family household size
If the organization served individuals or families more than one time in the past 12 months, please count that individual / family only ONCE.			
<b>EXPERIENCING HOMELESS</b> <b>Those lacking fixed, regular, adequate night-time residence</b> <i>(e.g., living in car, motorhome, park, campground, abandoned building, bus station, airport, etc.)</i> <b>Living in a supervised shelter</b> <i>(e.g., congregate, non-congregate, transitional housing, hotels / motels - paid by charitable / government organization, or institution)</i> <b>Losing primary nighttime residence</b> <i>(e.g., within 14 days of application, no subsequent residence identified, or lacks support networks / resources to obtain housing)</i>			
<b>UNACCOMPANIED YOUTH</b> <i>Unaccompanied individuals under 25 years old and it is not possible to live in safe environment.</i>		N/A	
<b>FAMILIES WITH CHILDREN AND/OR YOUTH</b> <ul style="list-style-type: none"> <li>No housing lease, ownership, or occupancy agreement for 60 days prior;</li> <li>Has moved two or more times within the last 60 days;</li> <li>Is expected to stay homeless due to chronic disability, addiction, history of violence, neglect;</li> <li>Sharing housing due to loss of housing, economic hardship, or similar reasons;</li> <li>Children of migrants;</li> <li>Those abandoned at a hospital or awaiting foster care placement; and/or</li> <li>Living in temporary accommodation for not more than 90 days in the residence of another individual</li> </ul>	N/A		
<b>INDIVIDUALS OR FAMILIES AT RISK OF HOMELESSNESS</b> <i>"Homeless" as defined in 24 CFR 91.5.</i> <ul style="list-style-type: none"> <li>Currently housed with temporary / emergency assistance (financial, services, rental assistance, etc.)</li> <li>Needs additional housing assistance / supportive services to avoid a return to homelessness</li> </ul>			



Please enter the total unduplicated number of people the organization served in the <b>PAST 12 MONTHS</b> for each of the following populations. Also identify average household size. <i>BLUE CAPS</i> Indicate HOME-ARP "qualifying populations"	# Individuals (single person household)	# Families	Average family household size																											
If the organization served individuals or families more than one time in the past 12 months, please count that individual / family only ONCE.																														
<p><b>Those Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking</b></p> <p><b>Domestic Violence:</b> A felony or misdemeanor crime of violence committed by a person: Who is / was in a social relationship of a romantic or intimate nature with the victim; With whom the victim shares a child in common; or Who is / was cohabitating with the victim (as a family member and / or a spouse or intimate partner).</p> <p><b>Dating Violence:</b> Violence committed by a person who is / was in a social relationship of romantic or intimate nature with the victim.</p> <p><b>Sexual Assault:</b> Nonconsensual sexual act including, but not limited to, a person who lacks capacity to consent.</p> <p><b>Stalking:</b> Engaging in a course of conduct directed at a specific person that would cause a reasonable person to: fear for their safety or the safety of others; or suffer substantial emotional distress.</p> <p><b>Human Trafficking:</b> The use of force, fraud, or coercion for the recruitment, harboring, transportation, provision, or obtaining a person for the purpose of: A commercial sex act (under the age of 18 is defined as a severe form of trafficking); or Labor or services through subjection to involuntary servitude, peonage, debt bondage, or slavery.</p>																														
<p><b>INDIVIDUALS / FAMILIES AT GREATEST RISK OF HOUSING INSTABILITY</b></p> <p><b>≤30% Area Median Income (AMI) and experiencing severe cost burden and paying more than 50% of monthly household income for housing costs</b></p> <p><b>OR</b></p> <p><b>≤50% AMI and meets at least one of the following conditions:</b></p> <ul style="list-style-type: none"> <li>Moved 2+ times over last 60 days</li> <li>Living in another's home due to economic hardship</li> <li>Notified housing terminated within 21 days</li> <li>Lives in hotel / motel not paid by charitable / government organization</li> <li>Lives in SRO / efficiency apartment, 2+ persons</li> <li>Lives in 1+ bedroom apartment w/&gt;1.5 persons per room</li> <li>Exiting institution, health / mental health facility, foster care youth facility, corrections, etc.</li> </ul> <table border="1" data-bbox="634 1077 946 1325"> <thead> <tr> <th>Household Size</th> <th>30% AMI Income Limit*</th> <th>50% AMI Income Limit*</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>\$17,880</td> <td>\$29,800</td> </tr> <tr> <td>2</td> <td>\$21,380</td> <td>\$35,880</td> </tr> <tr> <td>3</td> <td>\$27,980</td> <td>\$46,100</td> </tr> <tr> <td>4</td> <td>\$29,400</td> <td>\$49,900</td> </tr> <tr> <td>5</td> <td>\$29,850</td> <td>\$49,700</td> </tr> <tr> <td>6</td> <td>\$29,500</td> <td>\$49,100</td> </tr> <tr> <td>7</td> <td>\$31,500</td> <td>\$52,500</td> </tr> <tr> <td>8+</td> <td>\$33,550</td> <td>\$55,850</td> </tr> </tbody> </table> <p><small>*Effective June 15, 2022</small></p>	Household Size	30% AMI Income Limit*	50% AMI Income Limit*	1	\$17,880	\$29,800	2	\$21,380	\$35,880	3	\$27,980	\$46,100	4	\$29,400	\$49,900	5	\$29,850	\$49,700	6	\$29,500	\$49,100	7	\$31,500	\$52,500	8+	\$33,550	\$55,850			
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7	\$31,500	\$52,500																												
8+	\$33,550	\$55,850																												
<p><b>5. Please check any notable demographics within the homeless populations the organization serves:</b></p> <table border="0"> <tr> <td><input type="checkbox"/> Race</td> <td><input type="checkbox"/> Ethnicity</td> <td><input type="checkbox"/> Age</td> </tr> <tr> <td><input type="checkbox"/> Family makeup</td> <td><input type="checkbox"/> Individual</td> <td><input type="checkbox"/> Gender</td> </tr> <tr> <td><input type="checkbox"/> Veterans</td> <td><input type="checkbox"/> Disabled</td> <td><input type="checkbox"/> Active substance misuse / abuse</td> </tr> <tr> <td><input type="checkbox"/> Recovering substance misuse / abuse</td> <td><input type="checkbox"/> BIPOC (black, indigenous, and people of color)</td> <td><input type="checkbox"/> LGBTQ (lesbian, gay, bisexual, transgender, and queer)</td> </tr> </table>				<input type="checkbox"/> Race	<input type="checkbox"/> Ethnicity	<input type="checkbox"/> Age	<input type="checkbox"/> Family makeup	<input type="checkbox"/> Individual	<input type="checkbox"/> Gender	<input type="checkbox"/> Veterans	<input type="checkbox"/> Disabled	<input type="checkbox"/> Active substance misuse / abuse	<input type="checkbox"/> Recovering substance misuse / abuse	<input type="checkbox"/> BIPOC (black, indigenous, and people of color)	<input type="checkbox"/> LGBTQ (lesbian, gay, bisexual, transgender, and queer)															
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Please feel free to comment regarding notable demographics checked above.																														

6. How many unduplicated people from the above-noted <b>QUALIFYING POPULATIONS</b> did the organization provide the following services within the past 12 months? Please also identify funding source and waiting list data.	# Unduplicated people served in the past 12 months	Identify Funding Source Used to Provide Service	If waiting list is used, # people on waiting list	Average waiting time for those on waiting list to access services
If the organization served individuals or families more than one time in the past 12 months, please count that individual / family only ONCE.				
<b>Housing</b>				
<b>Accessing Housing / Case Management:</b> <i>Housing search, moving arrangements, securing utilities, submitting applications, etc.</i>				
<b>Homeless Services Counseling:</b> <i>Assistance in finding emergency shelter or gaining access to transitional housing.</i>				
<b>Housing:</b> <i>Providing affordable rental housing to qualified populations with a signed lease.</i>				
<b>Moving Costs:</b> <i>Truck rental / moving company fees to move into permanent housing.</i>				
<b>Rental Assistance:</b> <i>Paying rent to landlords for clients not able to afford monthly rent to maintain housing.</i>				
<b>Rental Arrears Payments:</b> <i>Payment of late fees or missed rent charges to remove a demonstrated barrier to maintain housing.</i>				
<b>Rental Deposit Assistance:</b> <i>Rental deposits to obtain housing.</i>				
<b>Rental Housing Counseling:</b> <i>HUD rental and rent subsidy programs, fair housing, rental search assistance, landlord tenant laws, lease terms, rent delinquency, referrals to state / local / federal resources.</i>				
<b>Utility Deposit Assistance:</b> <i>Deposits for gas, electric, water, and / or sewer.</i>				
<b>Utility Payments:</b> <i>Payments required by the utility company for gas, electric, water, and / or sewer.</i>				
<b>Healthcare</b>				
<b>Mental Health Services:</b> <i>Outpatient treatment, crisis intervention, counseling, prescriptions of psychotropic medications, etc. to address mental health conditions to bring about positive resolution.</i>				
<b>Outpatient Health Services:</b> <i>Outpatient treatment, in-home care, and / or emergency services including health assessments, health education, assistance in accessing health services, preventive medical care, prescriptions, follow up services, preventive and urgent dental care.</i>				
<b>Substance Abuse Treatment:</b> <i>Services to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.</i>				



How many unduplicated people in the <b>QUALIFYING POPULATIONS</b> did the organization provide the following services to <b>within the past 12 months</b> ? Please also identify funding source(s) and waiting list data.	# Unduplicated people served in the past 12 months	Identify Funding Source Used to Provide Service	If waiting list is used, # people on waiting list	Average waiting time for those on waiting list to access services
If the organization served individuals or families more than one time in the past 12 months, please count that individual / family only ONCE.				
<b>Supportive Services</b>				
<b>Child Care:</b> Payments to a licensed, qualified for the supervision and care of minor child(ren).				
<b>Employment Assistance or Job Training:</b> Classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.				
<b>Fair Housing &amp; Civil Rights:</b> Providing information and resources.				
<b>Food:</b> Providing meals and / or groceries.				
<b>Life Skills Training:</b> Teaching critical life management skills that have not been learned or were lost due to physical / mental illness, domestic / dating violence, sexual assault, stalking, human trafficking, substance misuse, or homelessness.				
<b>Legal Services:</b> Attorneys services for representation in matters that interfere with the ability to obtain and /or retain housing; child support; guardianship; paternity; protection orders for victims of domestic violence, dating violence, sexual assault, human trafficking, and / or stalking; benefits appeals; immigration; citizenship; etc.				
<b>Transportation:</b> Public / private transportation to access medical care, employment, childcare, or other services.				
<b>Homeless Services</b>				
<b>Emergency Shelter:</b> Non-private beds as temporary shelter to individuals and families. No lease required.				
<b>Non-Congregate Emergency Shelter:</b> Private units or rooms as temporary shelter to individuals and families. No lease required				
<b>Outreach Services:</b> Engaging qualified populations in the community to provide immediate support and intervention services. Includes initial assessment; crisis counseling; addressing urgent physical need (e.g., meals, blankets, clothes, or toiletries); actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services.				
<b>7. Does your organization provide non-congregate emergency shelter?</b>			<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>If yes, who owns the shelter building?</b>	<input type="checkbox"/> Organization Owns <input type="checkbox"/> Other Ownership			

If yes, does the organization have confirmed and reliable source(s) of funding for ongoing operating costs?		<input type="checkbox"/> Yes <input type="checkbox"/> No				
Please explain the funding source(s) for ongoing operating costs:						
8. Please share your opinion by ranking the need for additional funding to serve Billings' qualifying populations in the following areas:						
Rank the level of need for additional funding according to the following scale: 0 = No Need; 1 = Low Need; 2 = Moderate Need; 3 = High Need; 4 = Critical Need		Need for additional funding to serve qualifying populations in Billings				
		0	1	2	3	4
Rental Housing Counseling						
Pre-Purchase Homebuying Counseling						
Homeless Services Counseling						
Child Care						
Employment Assistance or Job Training						
Food						
Accessing Housing / Case Management						
Legal Services						
Life Skills Training						
Mental Health Services						
Outpatient Health Services						
Outreach Services						
Substance Abuse Treatment						
Transportation						
Rental Deposit Assistance						
Utility Deposit Assistance						
Moving Costs						
Rental Assistance						
Utility Payments						
Rental Arrears Payments						



<b>9. Please describe any prominent, <u>UNMET SERVICE NEEDS</u> specific to the following populations.</b> <i>If needed, please refer to the definitions on pages 2-3.</i>		
Individuals and / or families experiencing homeless		
Unaccompanied youth		
Individuals and / or families at-risk of homelessness		
Individuals and / or families requiring services or housing assistance to prevent homelessness		
Individuals and / or families at greatest risk of housing instability		
Individuals and / or families fleeing Domestic / Dating Violence		
Individuals and / or families fleeing Sexual Assault		
Individuals and / or families fleeing Stalking		
Individuals and / or families fleeing Human Trafficking		
Veteran individuals and / or families		
<b>10. Please rank the level of need for <u>developing additional shelter / housing</u> to serve qualifying populations within the Billings city limits.</b> <i>If needed, please refer to the definitions on pages 2-3.</i> Rank the level of need for additional shelter / housing according to the following scale: 0 = No Need; 1 = Low Need; 2 = Moderate Need; 3 = High Need, 4 = Critical Need		
<b>Experiencing Homelessness:</b> <ul style="list-style-type: none"> <li>• Lacking fixed, regular, adequate night-time residence</li> <li>• Living in a supervised shelter</li> <li>• Losing primary nighttime residence</li> </ul>	<b>Emergency Shelter:</b> Private units or rooms as temporary shelter to individuals and families. No lease required.	<b>Rental Housing:</b> Private single-family or multi-family rental units for individuals and / or families. Occupants must sign a lease.
<b>Individuals</b>		
<b>Families</b>		
<b>Unaccompanied Youth</b>		

Rank the level of need for additional shelter / housing according to the following scale: 0 = No Need; 1 = Low Need; 2 = Moderate Need; 3 = High Need, 4 = Critical Need		
<b>At-Risk of Homelessness:</b> <ul style="list-style-type: none"> <li>• &lt;30% Area Median Income</li> <li>• Lacks resources / support to prevent them from moving to shelter, other place</li> <li>• Moved 2+ times over last 60 days</li> <li>• Living in another's home due to economic hardship</li> <li>• Notified housing terminated within 21 days</li> <li>• Lives in hotel / motel not paid by charitable / government organization</li> <li>• Lives in SRO / efficiency apartment, 2+ persons</li> <li>• Lives in 1+ bedroom apartment w/&gt;1.5 persons per room</li> <li>• Exiting institution, health / mental health facility, foster care youth facility, corrections, etc.</li> </ul>	<b>Emergency Shelter:</b> Private units or rooms as temporary shelter to individuals and families. No lease required.	<b>Rental Housing:</b> Private single-family or multi-family rental units for individuals and / or families. Occupants must sign a lease.
<b>Individuals</b>		
<b>Families</b>		
<b>Unaccompanied Youth</b>		
<b>Those fleeing or attempting to flee domestic violence:</b> <i>A felony or misdemeanor crime of violence committed by a person: Who is / was in a social relationship of a romantic or intimate nature with the victim; With whom the victim shares a child in common; or Who is / was cohabitating with the victim (as a family member and / or a spouse or intimate partner).</i>	<b>Emergency Shelter:</b> Private units or rooms as temporary shelter to individuals and families. No lease required.	<b>Rental Housing:</b> Private single-family or multi-family rental units for individuals and / or families. Occupants must sign a lease.
<b>Individuals</b>		
<b>Families</b>		
<b>Unaccompanied Youth</b>		
<b>Those fleeing or attempting to flee dating violence:</b> <i>Violence committed by a person who is / was in a social relationship of romantic or intimate nature with the victim.</i>	<b>Emergency Shelter:</b> Private units or rooms as temporary shelter to individuals and families. No lease required.	<b>Rental Housing:</b> Private single-family or multi-family rental units for individuals and / or families. Occupants must sign a lease.
<b>Individuals</b>		
<b>Families</b>		
<b>Unaccompanied Youth</b>		
<b>Those fleeing or attempting to flee sexual assault:</b> <i>Nonconsensual sexual act including, but not limited to, a person who lacks capacity to consent.</i>	<b>Emergency Shelter:</b> Private units or rooms as temporary shelter to individuals and families. No lease required.	<b>Rental Housing:</b> Private single-family or multi-family rental units for individuals and / or families. Occupants must sign a lease.
<b>Individuals</b>		
<b>Families</b>		
<b>Unaccompanied Youth</b>		



Rank the level of need for additional shelter / housing according to the following scale: 0 = No Need; 1 = Low Need; 2 = Moderate Need; 3 = High Need, 4 = Critical Need		
<b>Those fleeing or attempting to flee stalking:</b> <i>Engaging in a course of conduct directed at a specific person that would cause a reasonable person to: fear for their safety or the safety of others; or suffer substantial emotional distress.</i>	<b>Emergency Shelter:</b> Private units or rooms as temporary shelter to individuals and families. No lease required.	<b>Rental Housing:</b> Private single-family or multi-family rental units for individuals and / or families. Occupants must sign a lease.
<b>Individuals</b>		
<b>Families</b>		
<b>Unaccompanied Youth</b>		
<b>Those fleeing or attempting to flee human trafficking:</b> <i>The use of force, fraud, or coercion for the recruitment, harboring, transportation, provision, or obtaining a person for the purpose of: A commercial sex act (under the age of 18 is defined as a severe form of trafficking); or Labor or services through subjection to involuntary servitude, peonage, debt bondage, or slavery.</i>	<b>Emergency Shelter:</b> Private units or rooms as temporary shelter to individuals and families. No lease required.	<b>Rental Housing:</b> Private single-family or multi-family rental units for individuals and / or families. Occupants must sign a lease.
<b>Individuals</b>		
<b>Families</b>		
<b>Unaccompanied Youth</b>		
	<b>Emergency Shelter</b>	<b>Rental Housing</b>
<b>Individual Veterans that meet one of the above criteria.</b>		
<b>Families, that include a Veteran Family Member, that meet one or more of the above criteria.</b>		
11. Is the organization an active and involved member of the Billings Continuum of Care? (e.g., regularly attending monthly meetings)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
12. Is the organization an active and involved member of the Montana Continuum of Care?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
13. Does the organization regularly use the Homeless Management Information System (HMIS) managed by the Montana Continuum of Care? (e.g., enter and update client data as appropriate)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
14. Does the organization actively participate in regularly-scheduled Coordinated Entry System meetings?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
15. Does the organization provide housing and/or services for those reviewed through the Coordinated Entry system?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

**Thank you for responding to this survey.** The City appreciates your participation and feedback! The information provided will be used to better understand community needs and priorities related to housing / homelessness in Billings and to facilitate the HOME-ARP allocation process.

Applications for HOME-ARP funding will be released following survey data review and analysis.

Please mail this completed survey to:

HOME-ARP Survey Response  
 Community Development Division  
 2825 3<sup>rd</sup> Ave. N, Suite 610  
 Billings, MT 59101



## Appendix B : Mayor's Letter of Support – City of Billings HOME-ARP Survey



Bill Cole, Mayor  
P.O. Box 1178  
Billings, MT 59103  
P 406.657.8296  
F 406.657.8390



Greetings,

The City of Billings will be allocating approximately \$969,000 received from the U.S. Department of Housing & Urban Development (HUD) through the HOME Investment Partnership Program (HOME) as part of the American Rescue Plan (ARP) to an eligible applicant(s). Funding must benefit individuals and families who are either homeless, at risk of homelessness, or part of other vulnerable populations as defined by HOME-ARP regulations.

The City created the following survey to gather information from local organizations to facilitate a needs assessment of service gaps. This will allow the City to prioritize a coordinated response to address the issues of homelessness and housing instability within our community. The City requests that your organization complete and submit the survey by **Monday, November 14<sup>th</sup>**. Please only submit *one survey per organization* to avoid duplication of data. Please note it may be helpful to review the paper survey and gather requested data prior to online submission. The online version can be accessed at: [www.surveymonkey.com/r/HOME-ARP\\_Billings](http://www.surveymonkey.com/r/HOME-ARP_Billings); however, completed paper surveys will also be accepted.

The City must evaluate the current needs and service gaps for all qualifying populations. It is imperative that organizations provide accurate data about the number of unduplicated individuals and families served, as well as services provided over the past 12 months. Errors and / or omissions will greatly impact the City's ability to produce a quality needs assessment. The final assessment will be available for review upon completion.

Please be aware that an applicant's eligibility to apply for funding may be dependent upon survey participation. Organizations interested in accessing HOME-ARP funding who submit a survey response may be given priority during the application review process.

Homelessness and housing instability continue to be issues affecting our community. I urge you to consider the implications of providing your organization's data in this survey so HOME-ARP funding might more effectively address the needs of the most vulnerable populations in Billings.

Questions and technical assistance requests should be directed to Carly Collins at 406-247-8675 or [collinsc@billingsmt.gov](mailto:collinsc@billingsmt.gov). Thank you in advance for your participation!

Sincerely,

William A. Cole, Mayor

WAC:CC

Attachment: HOME-ARP Service Provider Survey

[billingsmt.gov](http://billingsmt.gov)

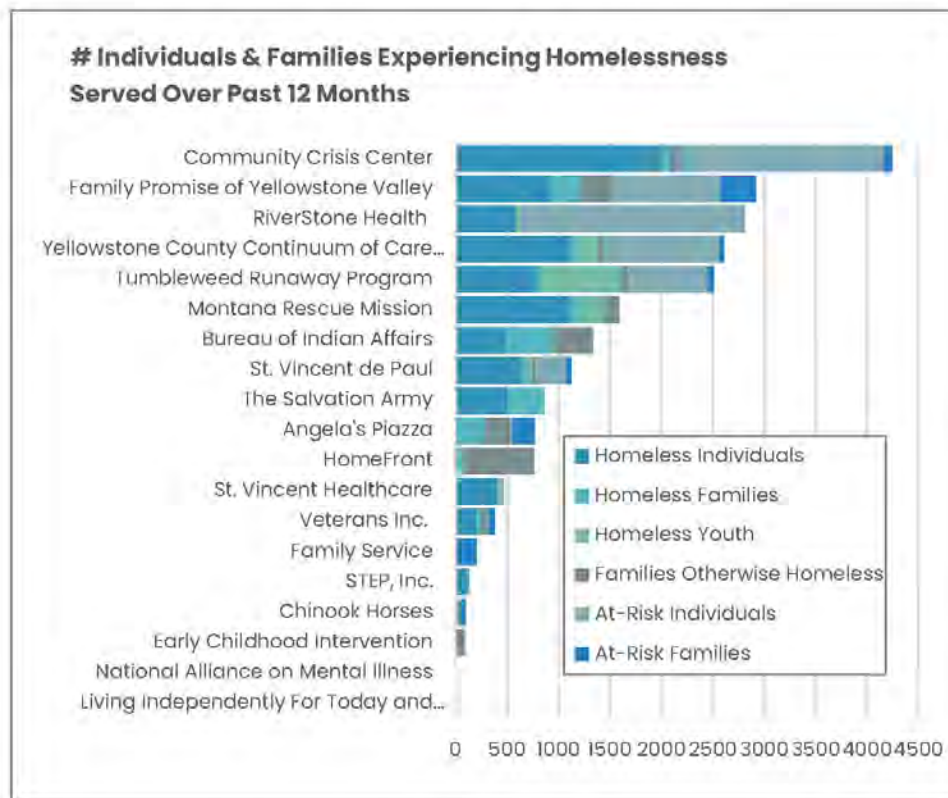


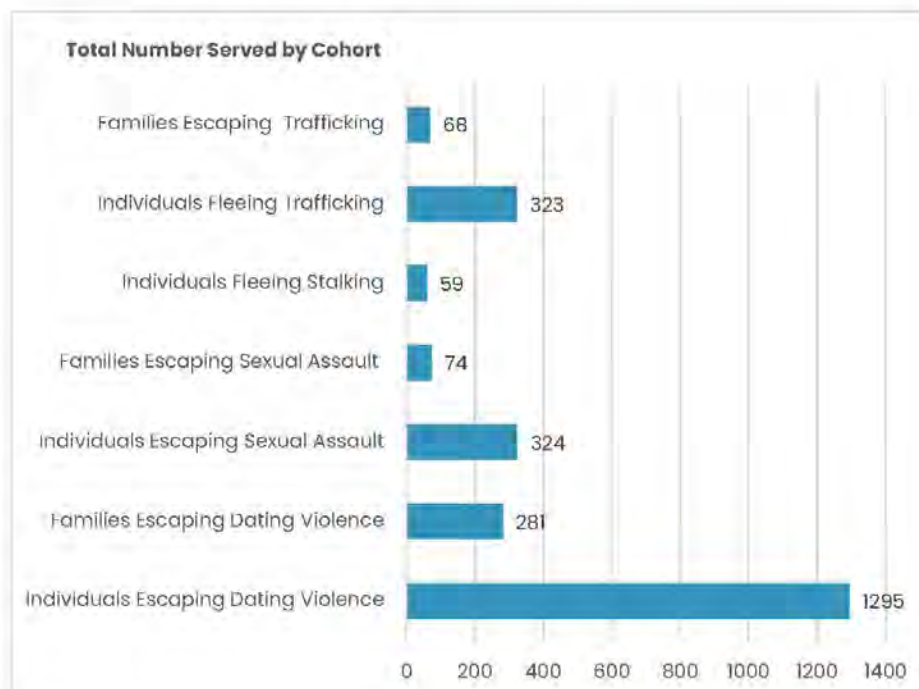
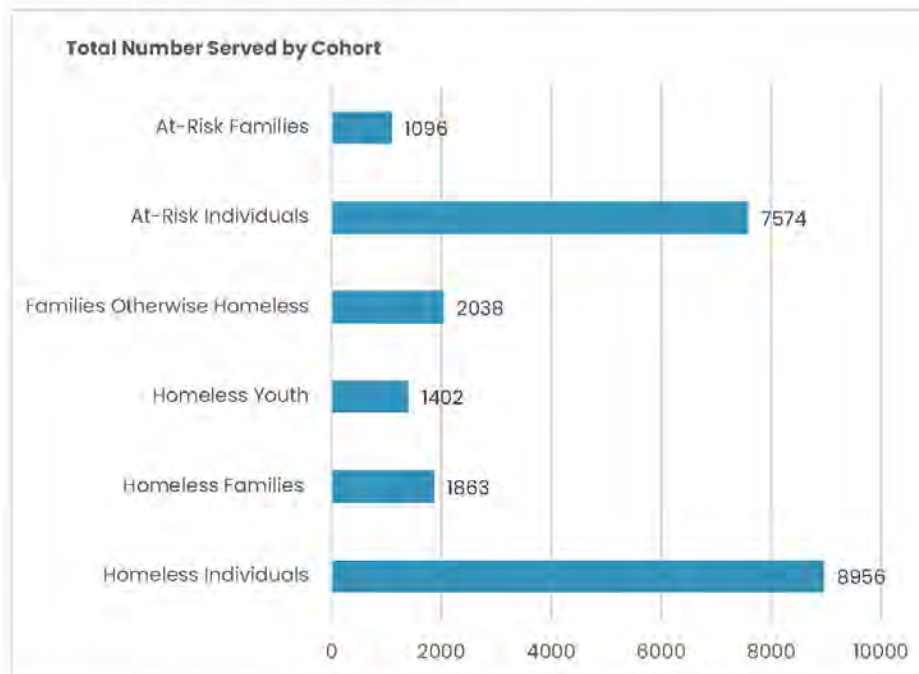
## Appendix C : Billings Housing & Shelter Inventory

### 2022 Summary of Available Beds

EMERGENCY SHELTER		Population	Family Units	Family Beds	Adult-Only Beds	Child Only Beds	Seasonal	Overflow / Voucher	Total Beds	Chronic Beds	Veteran Beds	Youth Beds
Temporary shelter for those experiencing homelessness. Does not require a lease / occupancy agreement.												
Community Crisis Center	Community Crisis Center	Single Males & Females			18			20	38			
Family Promise of Yellowstone Valley	Shelter	Households with Children	5	14					14			
Montana Rescue Mission	Shelter	Single Males & Females, Households with Children	14	28	58				86			
ShelterFirst	Shelter (Seasonal)	Single Adults & Households with Children					31		31			
YWCA, Billings	Gateway House	Single Adults & Households with Children	12	33	2				35			
YWCA, Billings	Gateway Horizons	Single Adults & Households with Children	25	77					77			
HER Campaign	Shelter	Single Females fleeing Human Trafficking			8				8			
			56	152	86	0	31	20	289	0	0	0
PERMANENT SUPPORTIVE HOUSING		Population	Family Units	Family Beds	Adult-Only Beds	Child Only Beds	Seasonal	Overflow / Voucher	Total Beds	Chronic Beds	Veteran Beds	Youth Beds
Community-based housing for formerly homeless, disabled, individuals / families to live as independently as possible. Month-to-month, indefinite leasing with supportive services.												
VASH HA Billings	VASH Vouchers	Veterans	14	30	60		16		106	60	60	60
YWCA, Billings	Gateway VISTA	Single Adults & Households with Children	24	74					74			
			38	104	60	0	16	0	180	60	60	60
RAPID RE-HOUSING		Population	Family Units	Family Beds	Adult-Only Beds	Child Only Beds	Seasonal	Overflow / Voucher	Total Beds	Chronic Beds	Veteran Beds	Youth Beds
Tenant-based, permanent housing rental and supportive services assistance for short-term (up to three months) and medium-term (4-24 months) for households experiencing homelessness.												
HRDC Dist 7	HRDC 7 ESG-RRH	Emergency Shelter Grant - Rapid Re-Housing	40	25	12				37			
Volunteers of America	SSVF - Billings VOA	Supportive Services for Veteran Families	7	3	7				10	7	7	7
YWCA, Billings	YWCA Billings		10	36	10				46			
			57	64	29	0	0	0	93	7	7	7
TRANSITIONAL HOUSING		Population	Family Units	Family Beds	Adult-Only Beds	Child Only Beds	Seasonal	Overflow / Voucher	Total Beds	Chronic Beds	Veteran Beds	Youth Beds
Interim housing, up to 24 months, with accompanying supportive services. Lease / occupancy agreement required.												
Family Promise of Yellowstone Valley	Transitional Housing	Households with Children	12	30					30			
HRDC Dist 7	Harmony House	Households with Children	5	10		10			20			
Volunteers of America	GPD-Independence Hall	Single Males			20				20	20	20	20
HER Campaign	Transitional Housing	Single Females & Females with Children	4	4					4			
			21	44	20	10	0	0	74	20	20	20

## Appendix D: Survey Charts

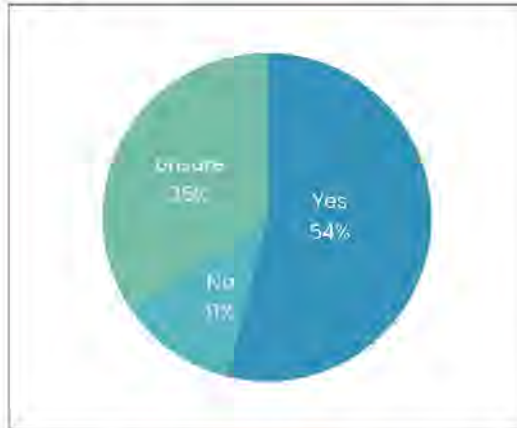




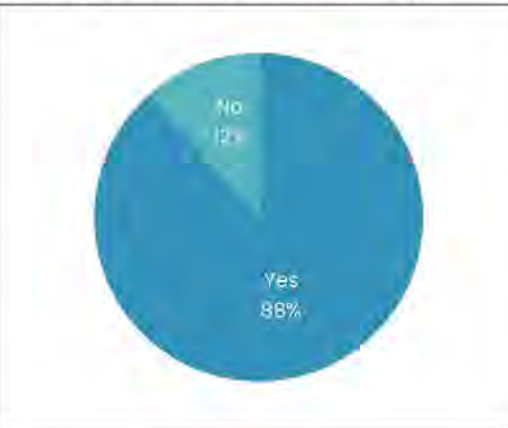


**CITY OF BILLINGS – COMMUNITY DEVELOPMENT DIVISION**  
**HOME-ARP Service Provider Survey Results: 26 Responding Organizations**

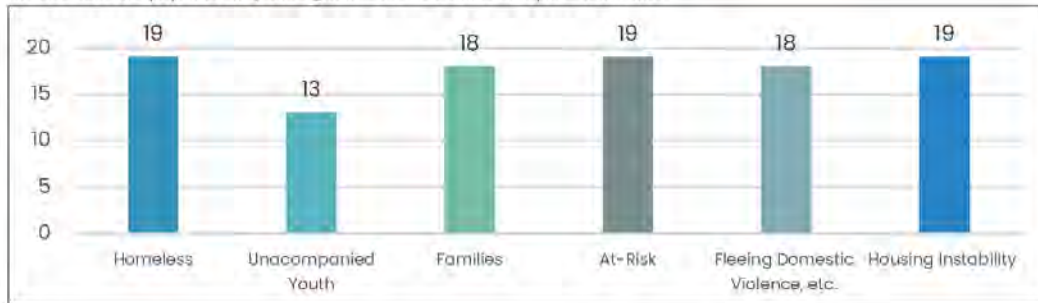
Is your organization interested in accessing HOME-ARP funding?



Does your organization solicit feedback from populations served? (e.g., client or participation satisfaction surveys)



Please select the populations your organization served over the past 12 months.



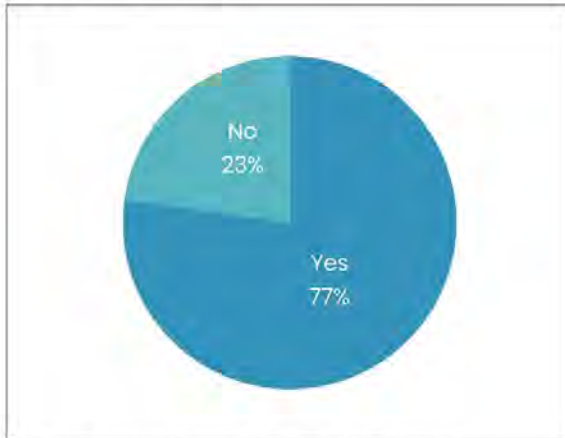
Please indicate any notable demographics within the populations your organizations is serving.

- St. Vincent de Paul serves all--there are no barriers to accessing services (food service, charity office, Representative Payee services, Drop-in-Center groups and case management, day shelter & meals, agency office for Mental Health Center, Rimrock and other providers who come here, and healthcare (Health Care for the Homeless has a clinic here two mornings each week). - We have seen an increase in the number of unaccompanied youth we serve and do refer them to Tumbleweed. We also have seen an increase in veterans who may or may not be eligible for VA services--we do attempt to hook them up with VOA or HUD-VASH case managers. Again, as there are no barriers to services here, we do see many in the categories described above and on a previous page.
- Category I Homelessness according to HUD; People with co-occurring disorders; chronic, repeated, long-term homelessness
- We serve anyone with a disability regardless of medical documentation, age, or any other attribute.
- Mental health (Bipolar, DID, Complex PTSD, etc..)
- All HMIS data needs are addressed in our housing program - Our focus is on the Veteran, however, the household can receive services as well depending on the program. / Veterans Inc.
- Literally homeless according to HUD definition for Category 1
- Federally recognized Tribal members
- Homeless who present as couples, with pets, and those with severe mental illness as well as those with COVID-19
- We primarily work with reservation Tribes/individuals.
- Referrals and support for persons under 18 and we serve Housed and ANYONE needing crisis care and persons not served by other non profits
- Children in the foster care system and parents completing the re-unification process / Chinook Horses
- YWCA Billings serves mostly women who have been victims of domestic violence, sexual assault, stalking, and human trafficking. As much as 60% of those served are American Indian. Many of those we serve have active substance use disorders or are in recovery.
- We serve women and pregnant women. Substance abuse and recovery is typical and each client typically has at least one mental health diagnosis because of the trauma endured in trafficking. / HER Campaign
- There is a large number of persons who are waiting treatment dates, who need housing and who cannot go to the shelter due to triggers. And or the shelter is too intense for persons who have mental health issues. / Community Crisis Center

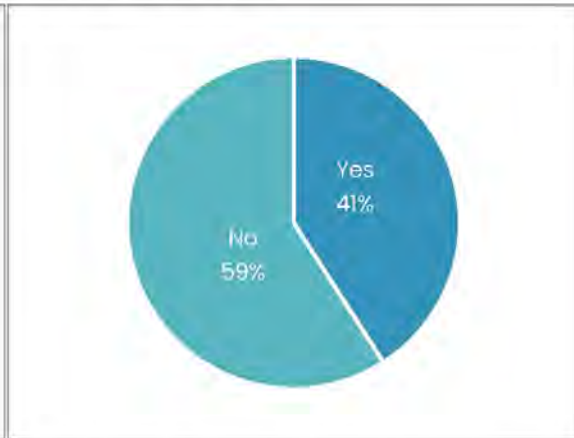


**CITY OF BILLINGS – COMMUNITY DEVELOPMENT DIVISION**  
**HOME-ARP Service Provider Survey Results: 22 / 26 Responding Organizations**

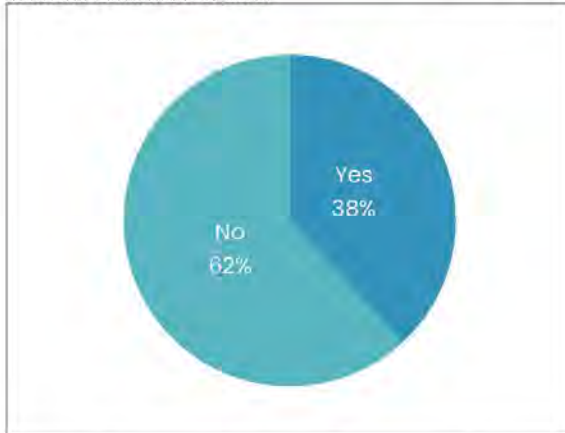
Is the organization an active and involved member of the Billings Continuum of Care?



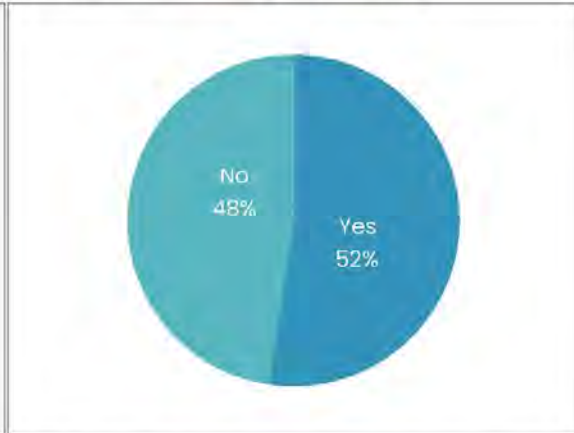
Is the organization an active and involved member of the Montana Continuum of Care?



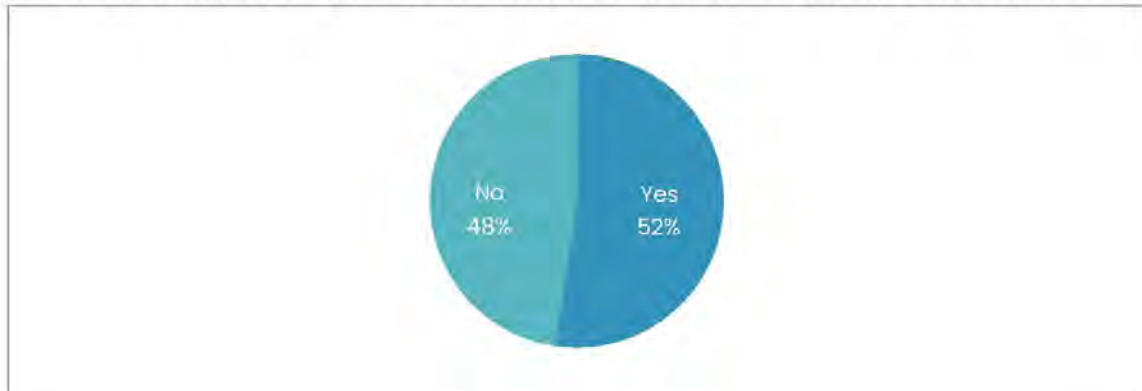
Does the organization regularly use the Homeless Management Information System (HMIS) managed by the Montana Continuum of Care?



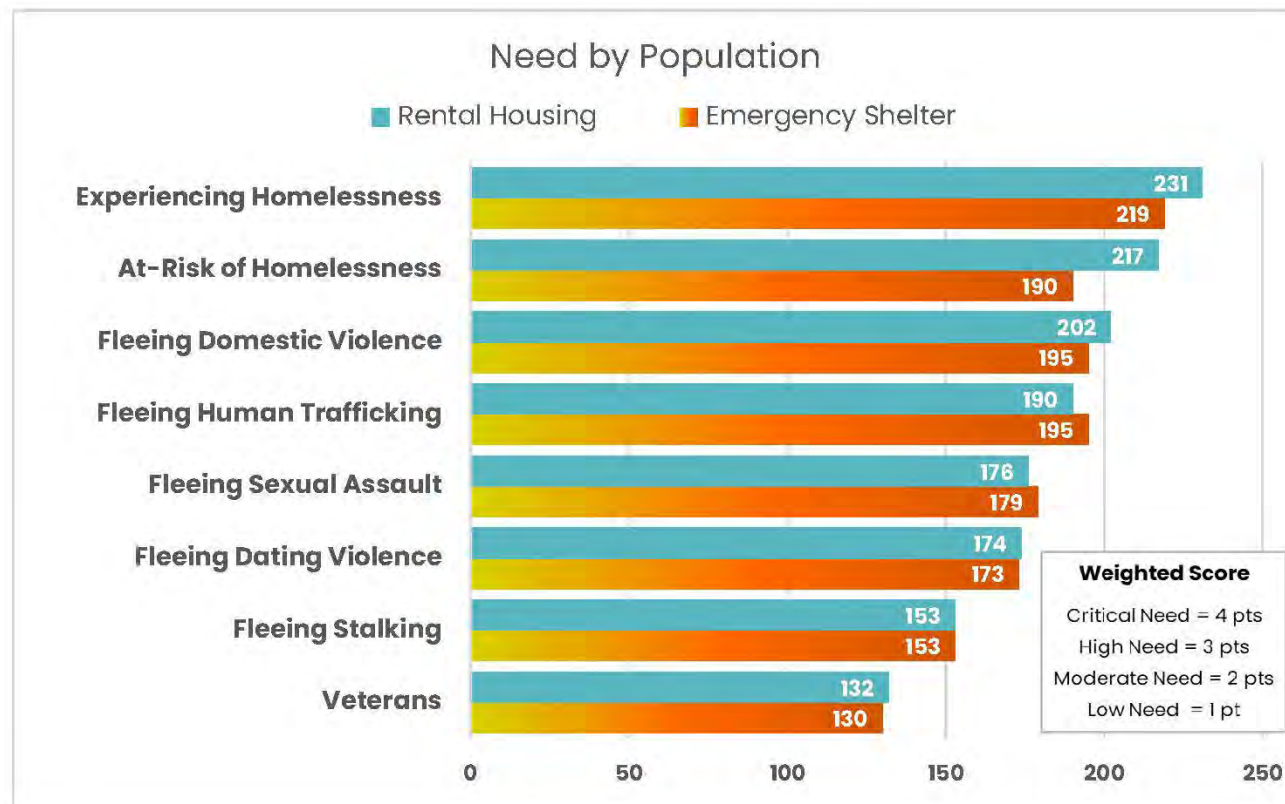
Does the organization actively participate in regularly-scheduled Coordinated Entry System meetings?



Does the organization provide housing and/or services for those reviewed through the Coordinated Entry system?



Organization Name	Is / does the organization:				
	<i>An active and involved member of the Billings Continuum of Care? (e.g., regularly attending monthly meetings)</i>	<i>An active and involved member of the Montana Continuum of Care?</i>	<i>Regularly use the Homeless Management Information System (HMIS) managed by the Montana Continuum of Care? (e.g., enter and update client data as appropriate)</i>	<i>Actively participate in regularly-scheduled Coordinated Entry System meetings?</i>	<i>Provide housing and/or services for those reviewed through the Coordinated Entry system?</i>
Riverstone Health	Yes	No	Yes	Yes	Yes
Chinook Horses	Yes	No	No	No	No
HomeFront	Yes	Yes			
YCA Human Trafficking Task Force	No	No	No	No	No
National Alliance on Mental Illness	No	No	No	No	No
The Salvation Army	Yes	Yes	No	Yes	Yes
District 7 Human Resources Development Council					
St. Vincent de Paul	Yes	Yes	Yes	Yes	Yes
Yellowstone County Continuum of Care (CoC)	Yes	Yes	Yes	Yes	Yes
Living Independently For Today and Tomorrow (LIFTT)	Yes	No	No	No	No
YWCA Billings	Yes	Yes	Yes	Yes	Yes
Her Campaign	No	No	No	No	No
Veterans Inc.	Yes	Yes	Yes	Yes	Yes
Family Promise of Yellowstone Valley	Yes	No	No	Yes	Yes
SYNERGY HomeCare					
Early Childhood Intervention					
STEP, Inc.	Yes	No	Yes	Yes	Yes
United Way of Yellowstone County	Yes	No	No	No	No
Tumbleweed Runaway Program	Yes	Yes	Yes	Yes	Yes
St. Vincent Healthcare	Yes	No	No	Yes	No
Off The Streets Corporation	Yes	No	No	No	No
Bureau of Indian Affairs	No	No	No	No	No
Community Crisis Center	Yes	Yes	Yes	Yes	Yes
Family Service					
Angela's Piazza	No	No	No	No	No
Montana Rescue Mission	Yes	Yes	No	No	Yes



Unduplicated number of individuals / families experiencing homelessness	Individuals	Families	Average Family Household Size	Total # People
Early Childhood Intervention		10	3	30
STEP, Inc.	121	2	3	127
HomeFront	13	47	3	154
Veterans Inc.	202	54		202
St. Vincent Healthcare	414			414
RiverStone Health - Billings, MT	590			590
Tumbleweed Runaway Program	778	60	1	838
St. Vincent de Paul	636	70	3	846
Angela's Piazza	30	251	4	1,034
Yellowstone County Continuum of Care (CoC)	1,128	53		1,128
The Salvation Army	509	354	3	1,394
Montana Rescue Mission	1,108	127	3	1,489
Family Promise of Yellowstone Valley	931	305	3	1,846
Community Crisis Center	2,011	75	2	2,161
Bureau of Indian Affairs	485	455	8	4,125
<b>Totals (may be duplicated - reporting variations &amp; agencies serving same people):</b>	<b>8,956</b>	<b>1,863</b>	<b>-</b>	<b>16,378</b>

Family size for those experiencing homelessness ranged from one to four with the exception of the Bureau of Indian Affairs. The average family household size for this organization is eight.

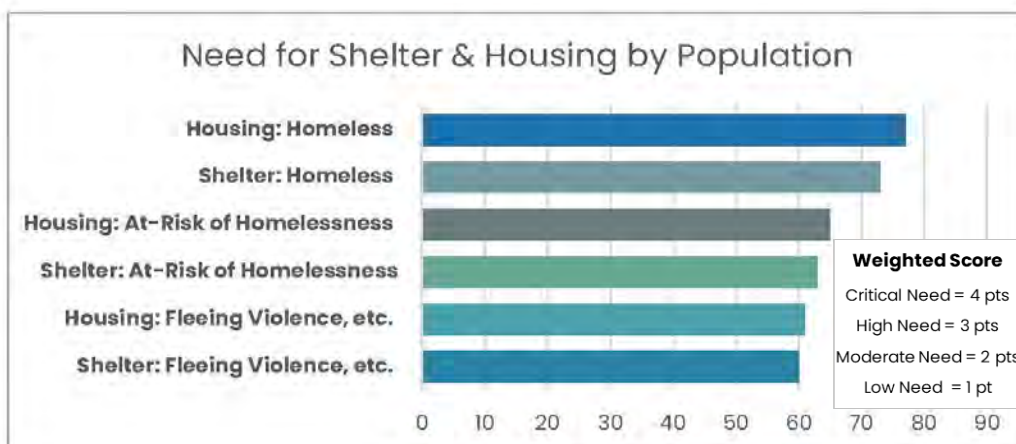
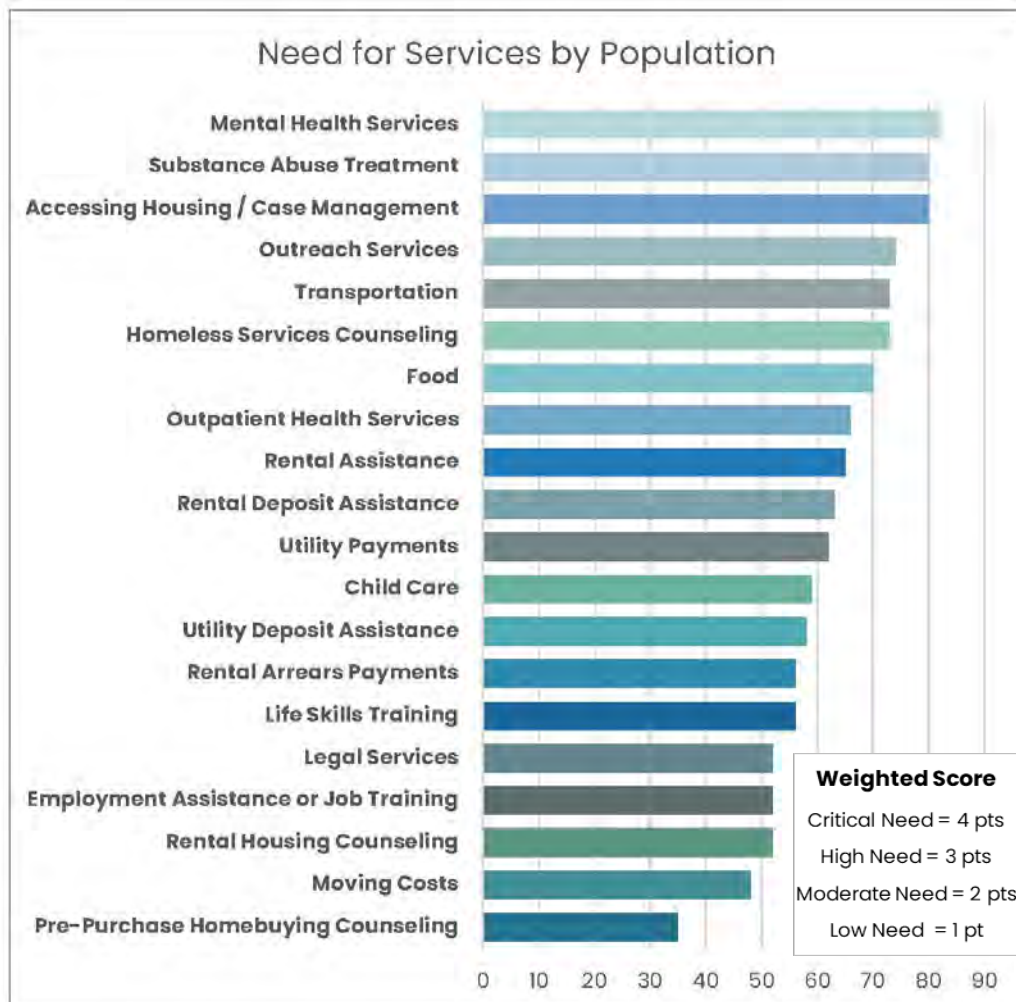
Total number of unaccompanied youth served over past 12 months	Total # People
Angela's Piazza	2
Living Independently For Today and Tomorrow	3
STEP, Inc.	11
Bureau of Indian Affairs	30
HomeFront	31
St. Vincent Healthcare	32
RiverStone Health - Billings, MT	37
St. Vincent de Paul	51
Yellowstone County Continuum of Care (CoC)	200
Montana Rescue Mission	227
Tumbleweed Runaway Program	778
<b>Totals (may be duplicated - reporting variations &amp; agencies serving same people):</b>	<b>1,402</b>



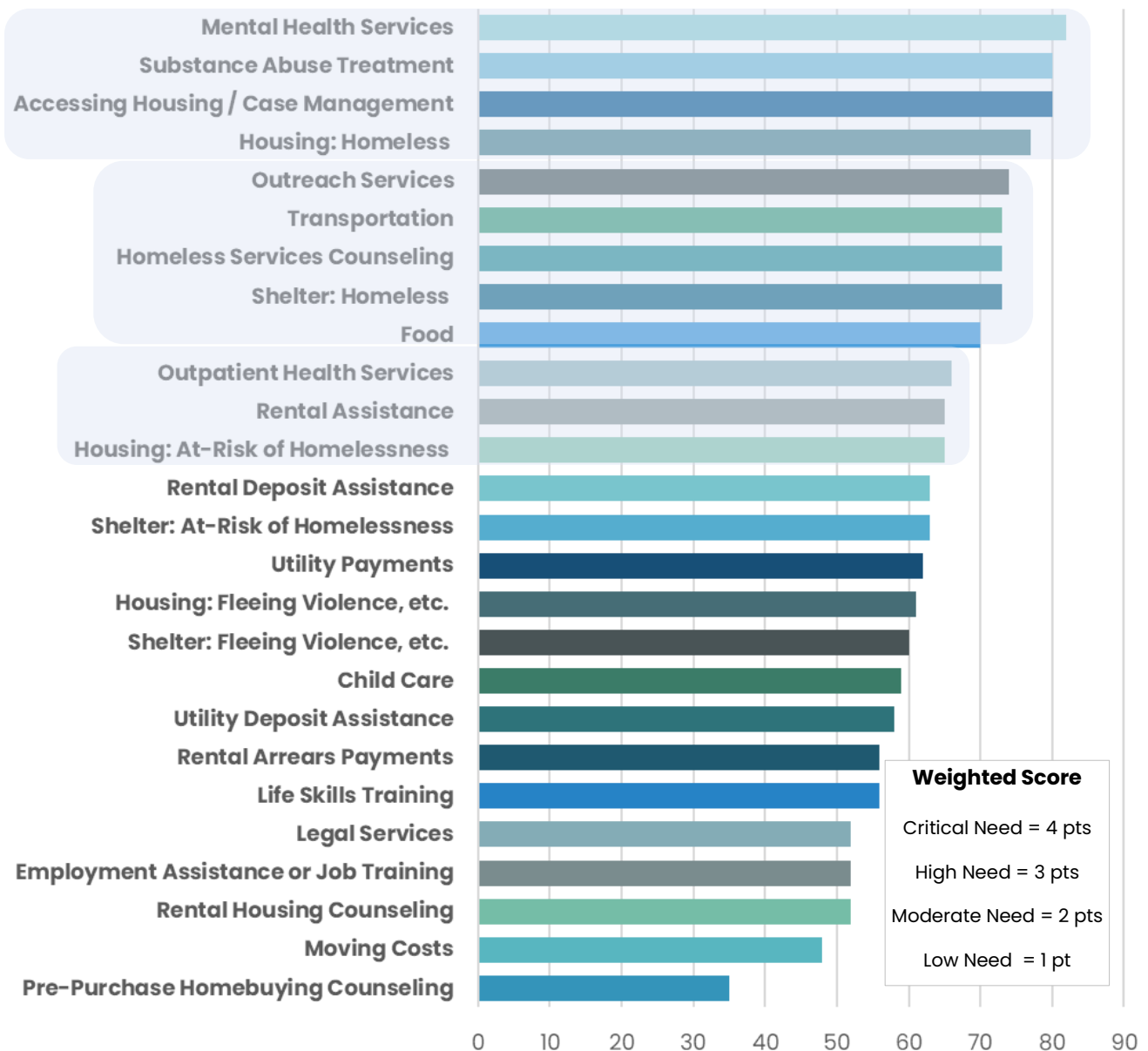
Organizations Reporting QP #s Served	Individuals (Number of)			Families (Number of)		
	Homeless	At-Risk of Homelessness	Unaccompanied Youth	Homeless	Homeless with children	At-Risk of Homelessness
Riverstone Health	590	2,184	37			
Chinook Horses		50				45
HomeFront	13		31	47	671	
National Alliance on Mental Illness		6				
The Salvation Army	509			354		
St. Vincent de Paul	636	301	51	70	19	48
Yellowstone County Continuum of Care (CoC)	1,128	1,128	200	53	53	53
Living Independently For Today and Tomorrow			3			
Veterans Inc.	202	21		54	54	54
Family Promise of Yellowstone Valley	931	1,052		305	291	340
Early Childhood Intervention				10	75	
STEP, Inc.	121		11	2	2	
Tumbleweed Runaway Program	778	778	778	60	60	60
St. Vincent Healthcare	414	19	32			
Bureau of Indian Affairs	485		30	455	366	
Community Crisis Center	2,011	2,011		75	70	75
Family Service						206
Angela's Piazza	30	24	2	251	250	215
Montana Rescue Mission	1,108		227	127	127	
<b>Totals (may be duplicated - reporting variations &amp; agencies serving same people):</b>	<b>8,956</b>	<b>7,574</b>	<b>1,402</b>	<b>1,863</b>	<b>2,038</b>	<b>1096</b>
	<b>Total Number of Individuals: 17,932</b>			<b>Total Number of Families: 4,997</b>		

Organizations Reporting QP #s Served	Individuals Fleeing or Attempting to Flee Violence				Families Fleeing or Attempting to Flee Violence			
	Domestic or Dating violence	Sexual Assault	Stalking	Human Trafficking	Domestic or Dating Violence	Sexual Assault	Stalking	Human Trafficking
St. Vincent de Paul	31	24		2	3			
Living Independently For Today and Tomorrow	2				2			
YWCA Billings	495	31		7	155	4		
Her Campaign				20				
Veterans Inc.	2							
Family Promise of Yellowstone Valley	216	216		216	68	68		68
Tumbleweed Runaway Program	22			27				
St. Vincent Healthcare	107							
Community Crisis Center	310	45	47	47	12			
Family Service	5							
Angela's Piazza	22	8	12	4	12	2		
Montana Rescue Mission	83				29			
<b>Totals (may be duplicated - reporting variations &amp; agencies serving same people):</b>	<b>1,295</b>	<b>324</b>	<b>59</b>	<b>323</b>	<b>281</b>	<b>74</b>	<b>0</b>	<b>68</b>
	<b>Total Number of Individuals: 2,001</b>				<b>Total Number of Families: 423</b>			





## Need for Services, Housing, Shelter by Population





## Waiting List Analysis

- Waiting lists are created by tracking specific individuals / families.
- If the number of individuals on a waiting list was not identified, the length of time those individuals typically stay on the waiting list was not considered.
- If the number of days, weeks, months, or years was not identified, this data was not considered.

**If an organization maintains a waiting list for services provided, the majority of time spent on a waiting list is one week or less.**

Accessing Housing / Case Management	# People	Days
<b>LIFTT:</b> Three are on the waiting list for six months.	3	180
<b>Family Promise:</b> 7 are on the waiting list for one week.	7	7
<b>Homeless Services Counseling</b>		
<b>CoC:</b> 1,089 are on the waiting list for two weeks.	1089	14
<b>Housing</b>		
<b>Family Promise:</b> 100 are on the waiting list for 90 days.	100	90
<b>YWCA:</b> Nine are on the waiting list for three months.	9	90
<b>CoC:</b> 1,128 are on the waiting list for three months.	1128	90
<b>Rental Deposit Assistance</b>		
<b>MRM:</b> 25 are on the waiting list for three months.	25	90
<b>Utility Deposit Assistance</b>		
<b>MRM:</b> 22 are on the waiting list for one month.	22	30
<b>Substance Abuse Treatment</b>		
<b>Community Crisis Center:</b> 78 are on the waiting list for up to two months.	78	60
<b>Child Care</b>		
<b>United Way:</b> 81 are on the waiting list for one year.	81	365
<b>Legal Services</b>		
<b>St. Vincent de Paul:</b> Four are on the waiting list for two weeks.	4	14
<b>Emergency Shelter</b>		
<b>Family Promise:</b> 100 are on the waiting list for 90 days.	100	90

## Appendix E: Affidavits of Publication & Public Notices

### Affidavit of Publication

STATE OF MONTANA

County of Yellowstone

Jonathan McNiven

Being duly sworn, deposes and says:

That he is the Legal Advertising Clerk of Yellowstone County News, a newspaper of general circulation published weekly in the town of Huntley, in the County of Yellowstone, State of Montana, and that the (6) folio Legal Notice of Public Hearing a true copy of which is hereto **Included**, was published in said newspaper on the following dates:

**August 12, 2022; August 19, 2022**

making in all (2) publication(s).

STATE OF MONTANA

County of Yellowstone

On this 19th day of August 2022, before me, the

undersigned, a Notary Public for the State of Montana,

personally appeared Jonathan McNiven, known to me to be the person whose name is subscribed to the

within instrument and acknowledged to me that he executed same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal that day and year first above written.

Tana McNiven

NOTARY PUBLIC for the State of Montana, residing at Huntley, MT.

My commission expires: August 23, 2024

### NOTICE OF PUBLIC HEARING

CITY OF BILLINGS

FY2021-2022 COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG) AND HOME INVESTMENT PARTNERSHIP PROGRAM (HOME) COMPREHENSIVE ANNUAL PERFORMANCE EVALUATION REPORT (CAPER) AND CURRENT COMMUNITY NEEDS FOR LOW-INCOME HOUSEHOLDS AND THOSE EXPERIENCING HOMELESSNESS

The City of Billings will hold a public hearing on Monday, September 12, 2022 at 5:30 pm to obtain public comment on:

- CDBG and HOME Comprehensive Annual Performance Evaluation Report (CAPER) for the prior program year; and
- Current community needs to assist the Community Development Board in:
  - o Designing the application process for the upcoming program year, before the publication of the drafted Annual Action Plan; and
  - o Regarding the needs of those experiencing homelessness in preparation for HOME-ARP assessment and planning activities.

Federal regulations require the City to facilitate two public hearings, at different stages of the program year, to obtain residents' views and respond to questions. Together, the hearings must address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, and a review of program performance.

Copies of the City's drafted FY2021-2022 CDBG and HOME CAPER are available beginning August 26, 2022 online at [www.BillingsMT.gov/CDReports](http://www.BillingsMT.gov/CDReports). The CAPER is also available for review at the Community Development office on the 6th floor of the Miller Building, 2825 3rd Avenue North, Billings, MT. The City must facilitate a minimum 15-day public comment period for the CAPER. The City of Billings exceeds this requirement by facilitating a public comment period beginning August 26 through September 12, 2022.

Due to COVID-19 health concerns, the format of the City Council meeting will be held in a partial virtual videoconferencing environment. In order to honor the Right of Participation and the Right to Know in Article II, sections 8 and 9, of the Montana Constitution, the City of Billings and City Council are making every effort to meet the requirements of the open meeting laws.

#### Public Participation:

- **City Council Agenda Packet:** View on the City's website [www.BillingsMT.gov/council-agendas](http://www.BillingsMT.gov/council-agendas).

#### • Watch the Meeting:

- o [www.BillingsMT.gov](http://www.BillingsMT.gov), click Watch Meetings Online.
- o Community 7 TV - Channel 7, Channel 507 - Spectrum Cable, or online at [www.com7tv.com](http://www.com7tv.com) - click Watch Live, Facebook, or YouTube. Recordings are also available after the meeting.
- Attend the Meeting: City Council Chambers, 210 North 27th Street, Billings, MT 59101.
- o Verbal comments are scheduled during the Public Comment / Public Hearings as indicated on the agenda. Written communication can be submitted any time prior to, or during, the public comment period.

• Accessibility: The public hearing is accessible to individuals with physical disabilities. Special arrangements for participation in the public hearing by individuals with hearing, speech, or vision impairment may be made upon request at least three days prior to the hearing. Fair Housing Equal Opportunity.

- o Leave a voice mail message by calling 406.657.8286 (Montana Relay 711).
- o Send an email to [beckettb@BillingsMT.gov](mailto:beckettb@BillingsMT.gov).
- o Send a written letter to Community Development, P.O. Box 1178, Billings, MT 59103.

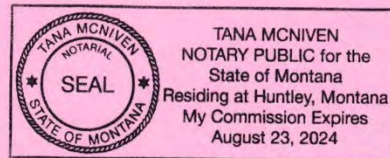
#### • Communicate via Email:

- o Emails can be sent to the City Council before 3:00 pm on the date of the Public Hearing at [council@BillingsMT.gov](mailto:council@BillingsMT.gov). All emails sent to the City Council can be viewed online at [www.BillingsMT.gov/council-emails](http://www.BillingsMT.gov/council-emails). Emails received after 3:00 pm and prior to 5:00 pm, may be read during the meeting.
- o Email comments to [beckettb@BillingsMT.gov](mailto:beckettb@BillingsMT.gov).

Published on August 12 and 19, 2022.

08/12, 08/19 2022  
MNAXLP

Denise R. Bohlman  
Billings City Clerk  
P.O. Box 1178  
Billings, MT 59103





# Affidavit of Publication

STATE OF MONTANA

County of Yellowstone

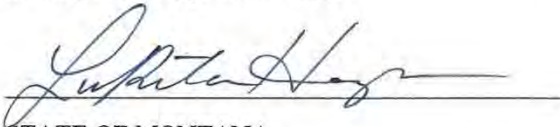
Lorita Harper

Being duly sworn, deposes and says:

That she is the Legal Advertising Clerk of Yellowstone County News, a newspaper of general circulation published weekly in the town of Huntley, in the County of Yellowstone, State of Montana, and that the (6) folio Legal, **Public Notice**, a true copy of which is hereto **Included**, was published in said newspaper on the following dates:

**February 24, 2023;;March 03, 2023;March 10, 2023**

making in all (3) publication(s).



STATE OF MONTANA

County of Yellowstone

On this 9th day of March 2023, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Lorita Harper, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed same.

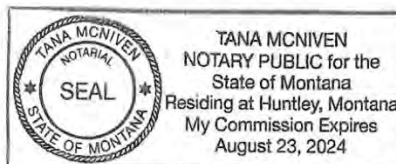
IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal that day and year first above written.



Tana McNiven

NOTARY PUBLIC for the State of Montana, residing  
at Huntley, MT.

My commission expires: August 23, 2024



## PUBLIC NOTICE CITY OF BILLINGS SUBSTANTIAL AMENDMENT FOR THE FY2021-2022 ANNUAL ACTION PLAN TO INCLUDE THE HOME INVESTMENT PARTNERSHIP PROGRAM - AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN

The City of Billings will hold a public hearing on Monday, March 13, 2023, at 5:30 pm, to obtain public comment on the substantial amendment to the FY2021-2022 Annual Action Plan to include the City's HOME-ARP Allocation Plan. Federal regulations require the City to facilitate at least one public hearing during the development of the HOME-ARP Allocation Plan and prior to submission to the Department of Housing and Urban Development (HUD). The hearing will allow the City to obtain residents' views, comments, recommendations, and to respond to questions. The City must also make the following information available to the public:

- The City of Billings received a HOME-ARP allocation totaling \$1,211,321.

- The activities the City may undertake include Administration and Planning; Production or Preservation of Rental Housing; Tenant-Based Rental Assistance (TBRA); Supportive Services; Acquisition or Development of Non-Congregate Shelter; and / or Nonprofit Operating and Capacity Building Assistance. Activities must benefit individuals and / or families experiencing homelessness and other qualifying populations.

Copies of the City's substantial amendment to the FY2021-2022 Annual Action Plan and the HOME-ARP Allocation Plan are available beginning February 25, 2023 online at [www.billingsmt.gov/homearp](http://www.billingsmt.gov/homearp). The drafted HOME-ARP Allocation Plan is also available for review at the Community Development office on the 6th floor of the Miller Building, 2825 3rd Avenue North, Billings, MT. The City must facilitate a minimum 15-day public comment period. The City of Billings exceeds this requirement by facilitating a public comment period beginning February 25 through March 13, 2023.

### Public Participation:

- **City Council Agenda Packet:** View on the City's website [www.BillingsMT.gov/councilagendas](http://www.BillingsMT.gov/councilagendas).

- **Watch the Meeting:**

- o [www.BillingsMT.gov](http://www.BillingsMT.gov), click Watch Meetings Online.

- o Community 7 TV - Channel 7, Channel 507 - Spectrum Cable, or online at [www.com7tv.com](http://www.com7tv.com) - click Watch Live, Facebook, or YouTube. Recordings are also available after the meeting.

- **Attend the Meeting:** City Council Chambers, 210 North 27th Street, Billings, MT 59101.

- o Verbal comments are scheduled during the Public Comment / Public Hearings as indicated on the agenda. Written communication can be submitted any time prior to, or during, the public comment period.

- **Accessibility:** The public hearing is accessible to individuals with physical disabilities. Special arrangements for participation in the public hearing by individuals with hearing, speech, or vision impairment may be made upon request at least three days prior to the hearing. Fair Housing Equal Opportunity.

- o Leave a voice mail message by calling 406.657.8286 (Montana Relay 711).

- o Send an email to [collinsc@billingsmt.gov](mailto:collinsc@billingsmt.gov).

- o Send a written letter to Community Development, P.O. Box 1178, Billings, MT 59103.

- **Communicate via Email:**

- o Emails can be sent to the City Council before 3:00 pm on the date of the Public Hearing at [council@BillingsMT.gov](mailto:council@BillingsMT.gov). All emails sent to the City Council can be viewed online at [www.BillingsMT.gov/councilemails](http://www.BillingsMT.gov/councilemails). Emails received after 3:00 pm and prior to 5:00 pm, may be read during the meeting.

- o Email comments to [collinsc@billingsmt.gov](mailto:collinsc@billingsmt.gov).

Published on February 24, March 3, and March 10, 2023.

Denise R. Bohlman  
Billings City Clerk  
P.O. Box 1178  
Billings, MT 59103

02/24, 03/03, 03/10 2023  
MNAXLP

PUBLIC NOTICE

CITY OF BILLINGS

**REVISED - SUBSTANTIAL AMENDMENT FOR THE FY2021-2022 ANNUAL ACTION PLAN TO INCLUDE THE HOME INVESTMENT PARTNERSHIP PROGRAM - AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN**

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**Public Participation:**

- **City Council Agenda Packet:** View on the City's website [www.BillingsMT.gov/councilagendas](http://www.BillingsMT.gov/councilagendas).
- **Watch the Meeting:**
  - [www.BillingsMT.gov](http://www.BillingsMT.gov), click *Watch Meetings Online*.
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  - Email comments to [collinsc@billingsmt.gov](mailto:collinsc@billingsmt.gov).

Published on March 10 & 17

Please send a PDF of the Affidavit of Publication to Community Development.



## MetraPark manager search ...

(Continued from page 1)

would have happened if we had had the full support of the community."

He went on to point out that during COVID, they were among only 15 percent of the fairs, nationwide, that were still held despite the restraints in place. And, he lamented the fact that as a result of the uncertainty of the past year, all the investment and work involved in developing a master plan has been abandoned.

When it comes to naming a manager to MetraPark, Goodridge said, "I believe I am that person." He added, "I hope to be able to finish what I have started."

"We are not going to get substantial benefit from hiring someone else," said board member Dave Williams.

"Why are you going to pull him out of the game?" questioned advisory board past president, Charlie Loveridge. "We had such a wonderful year." He added that MetraPark already has talented people and he is worried about losing them. "Their loyalty is unmatched," he said, underscoring the demoralizing events of the past year that they have had to tolerate.

At the same time, there were comments from others that even if the end result is to name Goodridge as the manager, "What are we out to have these people take a look?" said Director of Finance Kevin Bryan.

Reed suggested that they should look closely at the reasons for having a good year. Perhaps it was just a matter of coming out of the COVID restraints.

Commissioner Mark Morse said, "There is so much that we don't know. Tim may be the best guy, he may not."

Bryan continued in urging a search saying that while he felt confident that in the end Goodridge would be the choice, "We have one time to do it right."

Others disagreed. If their decision now didn't work out, they could do a search later. Board Chairman Mike Mayott said that they should look at the policies of it. "The county has gotten a black-eye." It would be wise to go with what has been working and forego spending \$50,000.

He went on to say, "There is nothing that has been positive for those working at MetraPark" but still the staff continued to do their jobs and remain there. To keep the current management and the structure is "to show that we are behind what they have been doing... that as a board, you are valuing them."

Board member Pam Ask said that "MetraPark has had a black-eye from the things that have been going on and to continue with a management that has been working." This puts the board in better position to move forward and to pursue the development of things like the master plan.

Others pointed out that a new manager – especially someone unfamiliar with the community – could take as much as two years to get acclimated. There could be cultural issues and time lost

due to unfamiliarity with the community – all issues that would not be issues with Tim Goodridge.

It was noted that often a new manager – no matter how well something is working, will want to impose their own ideas of what has worked for them, causing more staff turmoil.

All of the board agreed and told the county commissioners that whatever their decision they would stand behind them.

The general consensus seemed to be that while they were questioning the VSG proposal regarding the search for a manager, they were supportive of the rest of their proposal regarding providing recommendations for policies

and procedure and especially for providing training. Mayott, however, questioned whether they shouldn't do the policy development first prior to searching for a new manager. He said that the policies and procedures should be what MetraPark wants and not that of a new manager.

In other business before the board during their regular monthly meeting, Board member Rick Reed pointed out the impact of the state wrestling tournament on Metra's bottom line. The two-day event generated almost a quarter-of-a-million dollars. That's as much as many concerts and other events. Reed said that in understanding the economic impact to Metra Park, "We have to work hard

to keep high school events."

There was further discussion about the wrestling tournament with appreciation expressed to the several small schools in the area that stepped-up to provide better food in the hospitality room. There have been increasing complaints over the past couple of years about the deterioration of the quality of the food that is provided for the benefit of those involved in overseeing tournaments, such as coaches, bus drivers and other workers, which often totals some 300 or more people. It has been the responsibility of the Chamber of Commerce to provide the fare, which historically generated rave reviews.

The MetraPark advisory board chairman, Mike Mayott reviewed some of the requirements spelled out in the board's bylaws which they have not been following – one of which is the establishment of an executive committee. One of the duties of the executive committee is to set the agenda for meetings. The committee is to be comprised of the board chairman, vice chair and a member at large. Reed was unanimously elected as the member at large.

Ideas about how best to express the board's appreciation for MetraPark employees were bounced around, with the board coming to the decision to host a very nice, catered, dinner for employees once a year.

## LEGAL NOTICES PAGES 14-18

### CALL FOR SEALED BIDS: NOTICE TO BIDDERS

Sealed bids entitled HAIL DAMAGE REPAIRS AT BILLINGS COMMUNITY CENTER for the City of Billings, Montana, will be received by the Billings City Clerk, via email at [billings@billingsmt.gov](mailto:billings@billingsmt.gov) or by mail or delivery at 210 N. 27th Street, Billings, MT, 59101, P.O. Box 1178, Billings, MT 59103, until 2:00 PM (MST) on Tuesday, April 4, 2023 and then publicly opened and read about via Facebook Live on the City's Facebook page <https://www.facebook.com/BillingsMT>. Bid tabulations will be posted for public viewing after the bids have been opened.

More specific additional information regarding the HAIL DAMAGE REPAIRS AT BILLINGS COMMUNITY CENTER can be obtained by contacting JOHN CATERINO, FACILITIES MANAGER, by telephone at 406-855-8454, or via email at [JCATERINO@BILLINGSMT.GOV](mailto:JCATERINO@BILLINGSMT.GOV). The full bid packet may also be found on the City's website at [www.billingsmt.gov](http://www.billingsmt.gov) by clicking on "Doing Business" and then on "Bids".

An optional pre-bid walk-through of the premises is scheduled for Tuesday, March 21, 2023, at 11:00 AM MST. Meet inside at conference room of Billings Community Center located at 360 N. 23rd St. Billings, MT 59101.

Each bid must be accompanied by a Certified Check, Cashier's Check, or Bid Bond payable to the City of Billings, Montana, in an amount not less than ten percent (10%) of the total amount of the bid. The bid security will be retained by the City Clerk until the successful bidder enters into a contract with the City of Billings. If no contract is entered into, the successful bidder, within sixty (60) days the security may be forfeited to the City of Billings. Successful bidders will be required to furnish an approved Performance Bond and Labor and Materials Bond Payment Bond in the amount of one hundred percent (100%) of the contract amount.

Bidders may withdraw their bid either personally or by written request at any time prior to the time set for bid opening. No bid may be withdrawn or modified after the time set for opening, unless and until the award of the contract is delayed for a period exceeding ninety (90) days. The right is reserved to reject any or all bids received, to waive irregularities, to postpone the award of the contract for a period of not to exceed ninety (90) days, and to accept that bid which is in the best interests of the City of Billings, Montana.

The prices established from this bid may be extended to other political subdivisions within the State of Montana solely at the vendor's discretion. The City of Billings is an Equal Opportunity Employer. The Contractor and subcontractor shall abide by the requirements of 41 CFR 60-300.56 and 41 CFR 60-741.56, which prohibit discrimination against qualified protected veterans and/or qualified individuals on the basis of disability, and requires affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified protected veterans and individuals with disabilities. Published on March 10 and 17, 2023.

03/10, 03/17/2023  
Dorise R. Bohman  
Billings City Clerk  
P.O. Box 1178  
Billings, MT 59103

### REVISED PUBLIC NOTICE

CITY OF BILLINGS  
REVISED - SUBSTANTIAL AMENDMENT FOR THE FY2021-2022  
ANNUAL ACTION PLAN TO INCLUDE THE  
HOME INVESTMENT PARTNERSHIP PROGRAM -  
AMERICAN RESCUE PLAN HOME-ARP ALLOCATION PLAN

The City of Billings will hold a public hearing on Monday, March 13, 2023, at 5:00 pm, to obtain public comment on the substantial amendment to the FY2021-2022 Annual Action Plan to include the City's HOME-ARP Allocation Plan. Federal regulations require the City to facilitate at least one public hearing during the development of the HOME-ARP Allocation Plan and prior to submission to the Department of Housing and Urban Development (HUD). The hearing will allow the City to obtain residents' views, comments, recommendations, and to respond to questions. The City must also make the following information available to the public:

- The City of Billings received a HOME-ARP allocation totaling \$1,211,221.
- The activities the City may undertake include Administration and Planning; Production or Preservation of Rental Housing; Tenant-Based Rental Assistance (TBRA); Supportive Services; Acquisition or Development of Non-Compulsory Shelter; and / or Nonprofit Operating and Capacity Building Assistance. Activities must benefit individuals and / or families experiencing homelessness and other qualifying populations.
- Copies of the City's substantial amendment to the FY2021-2022 Annual Action Plan and the HOME-ARP Allocation Plan are available beginning February 25, 2023 online at [www.billingsmt.gov/council](http://www.billingsmt.gov/council). The drafted HOME-ARP Allocation Plan is also available for review at the Community Development office on the 8th floor of the Miller Building, 2825 3rd Avenue North, Billings, MT. The City must facilitate a minimum 15-day public comment period. The City of Billings exceeds this requirement by facilitating a public comment period beginning February 25 through March 20, 2023.

Public Participation

- City Council Agenda Packet: View on the City's website [www.billingsmt.gov/council](http://www.billingsmt.gov/council).

Watch the Meeting:

- o [www.BillingsMT.gov](http://www.BillingsMT.gov), click Watch Meetings Online.
- o Community 7 TV - Channel 507 - Spectrum Cable, or online at [www.billingsmt.gov/council](http://www.billingsmt.gov/council).
- o Click Watch Live, Facebook, or YouTube. Recordings are also available at [www.billingsmt.gov/council](http://www.billingsmt.gov/council).

Attend the Meeting: City Council Chambers, 210 North 27th Street, Billings, MT 59101.

Verbal comments are welcomed during the Public Hearing. Public Hearing as indicated on the agenda. Written communication can be submitted any time prior to, or during, the public comment period.

Accessibility: The public hearing is accessible to individuals with physical disabilities. Special arrangements for participation in the public hearing by individuals with hearing, speech, or vision impairment may be made upon request at least three days prior to the hearing. For Hearing Equal Opportunity.

o Leave a voice mail message by calling 406.857.8286 (Montana Relay 711).

o Send an email to [council@billingsmt.gov](mailto:council@billingsmt.gov).

o Send a written letter to Community Development, P.O. Box 1178, Billings, MT 59103.

o Communicate via Email.

o Emails can be sent to the City Council before 3:00 pm on the date of the Public Hearing at [council@billingsmt.gov](mailto:council@billingsmt.gov). Emails received after 3:00 pm and prior to 5:00 pm, may be read during the meeting.

o Email comments to [council@billingsmt.gov](mailto:council@billingsmt.gov).

Published on March 10 and March 17, 2023

03/10, 03/17/2023  
Dorise R. Bohman  
Billings City Clerk  
P.O. Box 1178  
Billings, MT 59103

### NOTICE OF PUBLIC HEARING

City-County Planning Division  
2825 3rd Ave North, 4th Floor, Miller Building, Billings, MT 59101

Notice is hereby given that the Board of Adjustment of the City of Billings, Montana will hold a public meeting on April 5, 2023, at 6:00 p.m., and have a public hearing on the following Appeal of an Administrative Decision:

Appeal 23-01 - 818 Howard Avenue - Appeal the Determination that corrugated steel is not a commonly used fence material and the structure in question is not a fence. The Zoning Coordinator, in cooperation with the Code Enforcement Division needs the determination that corrugated steel is not a commonly used fence material in a residential zone is related to the fence re-constructed at 818 Howard Avenue (BMOO Section 27-102B.1). The property owner now appeals such determination. The property is located on Lots 37 & 38, Block 15 of Broadwater Subdivision and is zoned R1-First Neighborhood. Tax ID: A35841.

The Board may affirm, modify or reverse the determination of the Zoning Coordinator in this matter. BMOO 27-161E.

The City Board of Adjustment will hold its public hearing in the 1st Floor Conference Room at 2825 3rd Avenue North (Miller Building) starting at 6 pm, April 5, 2023.

All interested persons are invited to attend in person or view the meeting online on the Billings Planning & Community Services Facebook Page here: <https://www.facebook.com/billingsplanning>

A public comment phone line is available for on-line viewers to provide testimony during the specific Public Comment periods announced by the Chairman during the hearings. The call in phone number is 406.857.8286. All callers will be in a queue system and are asked to remain on hold and be patient. Calls will be taken in the order in which they are received. Callers will be restricted to 3 minutes of testimony as is customary.

Written comments may also be sent to Board via email to [council@billingsmt.gov](mailto:council@billingsmt.gov) or [barb@billingsmt.gov](mailto:barb@billingsmt.gov) before 1:00 PM on April 5, 2023. All emails received prior to this time will become part of the record for the public hearing.

Additional information on this application is available on-line at <https://www.billingsmt.gov/2361/Current-Zoning-Applications> or in the Planning Office at 2825 3rd Ave N - 4th Floor.

Public hearings are accessible to individuals with physical disabilities. Special arrangements for participation in the public hearings by individuals with hearing, speech, or vision impairment may be made upon request at least three days prior to the hearing. Please notify Robbin Bartley, Administrative Assistant, at 247-8676 or e-mail to [barb@billingsmt.gov](mailto:barb@billingsmt.gov).

Dated: March 7, 2023

City Board of Adjustment  
Published on March 10 and March 17, 2023

03/10, 03/17/2023  
Tammy Delnes  
Planning Clerk  
2825 3rd Ave N, 4th Floor  
Billings, MT 59101

### NOTICE OF PUBLIC HEARING

City-County Planning Division  
2825 3rd Ave North, 4th Floor, Miller Building, Billings, MT 59101

Notice is hereby given that the Board of Adjustment of the City of Billings, Montana will hold a public meeting on April 5, 2023, at 6:00 p.m., and have public hearings on the following appeals:

Return Item: City Variance 1361 - Angel Oak Lane, The Timbers Sub - Attached Garage Location Entry - A variance from Section 27-300.6, A1) Attached Garage Location and Entrance to allow attached garage space in the front half of structures and allow the garage entrance to face the street frontage, in a Mixed Residential 1 (MX1) zone, on Lots 1 through 27 of Block 1, The Timbers Subdivision (final plat pending). The Variance affects 4.3 acres of land. Tax ID: D32502 (part).

City Variance 1363 - 630 Key City Drive - Residential use on the ground floor in the front 30 feet in a re-built - A variance request from Section 27-102C, and Table 27-100.1 including any residential use in a CMU/ concrete zone defined be located less than 30 feet behind the front facade, on the East side of Lot 10, Block 1, Key City Drive, a 2.618 of parcel of land. The variance would allow the owner to rebuild a severely damaged residential structure without building a mixed use structure. Tax ID: C00795.

City Variance 1364 - 315 Cady Circle - Rear Yard Location, Rear Setback, Building Height, and Minimum Separation from Principal Structure - A variance from Section 27-300.3, Table 27-300.4 - A7 (Rear Yard Location for Accessory Building), A.8 (Minimum Rear Setback of 3 feet), B.13 (Height of Accessory Structure), and Section 27-1603 (Detached accessory structure Requires 6-foot minimum separation in an NC zone situated on Lot 27, Block 11, Meadowbrook Subdivision, a 12,840 of parcel of land. If approved, the variance will allow an existing detached accessory to remain in place. Tax ID: C08058.

City Variance 1365 - 6410/6412 Southern Bluffs Lane - Location of Garage and Garage Entry - A variance from Section 27-308, Table 27-300.7 - A11 (Attached garage location and garage entry location in an NC zone district to allow an attached garage in the front half of the proposed structure and a street front garage entry, on Lot 6, Block 1, Forest Ridge Estates, 2nd Filing on an 11,402 of parcel of land. Tax ID: A35151.

The City Board of Adjustment will hold its public hearing in the 1st Floor Conference Room at 2825 3rd Avenue North (Miller Building) starting at 6 pm, April 5, 2023.

All interested persons are invited to attend in person or view the meeting online on the Billings Planning & Community Services Facebook Page here: <https://www.facebook.com/billingsplanning>

A public comment phone line is available for on-line viewers to provide testimony during the specific Public Comment periods announced by the Chairman during the hearings. The call in phone number is 406.857.8286. All callers will be in a queue system and are asked to remain on hold and be patient. Calls will be taken in the order in which they are received. Callers will be restricted to 3 minutes of testimony as is customary.

Written comments may also be sent to Board via email to [barb@billingsmt.gov](mailto:barb@billingsmt.gov) or [council@billingsmt.gov](mailto:council@billingsmt.gov) before 1:00 PM on April 5, 2023. All emails received prior to this time will become part of the record for the public hearing.

Additional information on this application is available on-line at <https://www.billingsmt.gov/2361/Current-Zoning-Applications> or in the Planning Office at 2825 3rd Ave N - 4th Floor.

Public hearings are accessible to individuals with physical disabilities. Special arrangements for participation in the public hearings by individuals with hearing, speech, or vision impairment may be made upon request at least three days prior to the hearing. Please notify Robbin Bartley, Administrative Assistant, at 247-8676 or e-mail to [barb@billingsmt.gov](mailto:barb@billingsmt.gov).

Dated: March 7, 2023

City Board of Adjustment  
Published on March 10 and March 17, 2023

03/10, 03/17/2023  
Tammy Delnes  
Planning Clerk  
2825 3rd Ave N, 4th Floor  
Billings, MT 59101



## Appendix F: Public Outreach Attendance Lists



### Community Development Division

Information Session: CDBG, HOME, Affordable Housing  
Development, AmeriCorps VISTA, and HOME-ARP

Friday, December 16, 2023, 2:30pm – 4:00pm

Library Community Room

NAME	AGENCY / AFFILIATION		
RONALD Skers	HRDC7, Home Center		
Patricia Wadsworth	Home Front		
Tina Stark	Respite of MT		
Krystal Bickel	Adult Resource Alliance		
Doug WILSON	CDH		
Tesla Shallen	Homefront		
Helen Verhagel	Homefront +		
Skylar Magee	Homefront		
MAX FRENCH	MRM		
Doug Dushoff	MRM		
Marguerite Felig	South Side Neighborhood TF		
Steve Smorens	BAR		
Larry Larsen	Premier Group Real Estate HUB		
Mark Spiffing	GRFFIN DULP		



Meeting ID  
88944555003

Topic  
PCSD Information Session

Name (Original Name)	Join Time	
Tyler's Otter.ai	12/16/2022 14:08	Start Time
Jennifer Olson (HUD)	12/16/2022 14:24	12/16/2022 14:07
GIA	12/16/2022 14:24	
iPhoneTyler (2)	12/16/2022 14:24	End Time
Lisa Donnot	12/16/2022 14:28	12/16/2022 15:34
Autumn-NWMT	12/16/2022 14:28	
Dean Wells	12/16/2022 14:28	Duration (Minutes)
Rosie Goldich - she/her	12/16/2022 14:29	87
Wes Feist - MT SWIB	12/16/2022 14:30	
Heather McMillin	12/16/2022 14:30	Participants
tara williamson (ryan rummel)	12/16/2022 14:30	12
Collin W. (Collin W. DII GSR)	12/16/2022 14:37	

OK



## Appendix G : Public Comments

**From:** [Matt Lundgren](#)  
**To:** [Collins, Carly](#)  
**Cc:** [Oksana](#); [Beckett, Brenda](#)  
**Subject:** [EXTERNAL] Public Comment on City of Billings Home ARP Allocation Plan  
**Date:** Tuesday, February 28, 2023 11:49:47 AM

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Ms. Collins,

Thank you for producing the City of Billings Home ARP Allocation Plan. It is informative and professional.

However, I wonder if the data reported is accurate. I do not believe there is any foul play, rather, I believe there were different assumptions about what definitions were used when the data was requested and, as one who filled out the survey for my organization, there was no guidance or specificity provided regarding the number of clients served based on whether they were - unduplicated or duplicated- ie. unique individuals or those served multiple times by the same agency. Because of this, I believe we have a faulty data set in the report. Therefore we can not use the conclusions from this report to make any accurate recommendations for funding allocations.

Case in point, on page 18 of the report it is listed that there were 1,545 persons counted as homeless in Montana as a whole in 2020 and 224 in Billings specifically. However, on the previous page 17 over 22,000 persons are listed collectively as having been served by organizations in Bilings in 2022. This presents the basis for my supposition that the data is mis reported. If there are only 224 homeless persons counted in Billings in 2020, then either 21,600 were missed in the count, homelessness increased by over 21,000 in two years or agencies have reported client encounters/visits rather than unique individuals served and are thus "duplicating" these numbers.

For us at Montana Rescue Mission- the largest shelter in our region with over 200 beds in our facility, we reported on your survey that we served approximately 1,600 unduplicated/unique persons. We saw the questions as referring to unduplicated/unique individuals. However, if we at Montana Rescue Mission were to report each guest encounter/visit or in other words reported "duplicated" visits, our count for each time we served the same person on a daily basis throughout the year, then our numbers would be approximately 50,124.

In the survey, for example, it is reported that the Community Crisis Center- an organization with approximately 20 beds reported serving approximately 4,200 persons. This is three times the number served by Montana Rescue Mission. I am not claiming that they falsified their data, rather I am supposing that they counted serving the same person multiple times within the year. In the report, as I recall, no specificity was given as to whether were to count unduplicated or unique individuals or if it was a count of the number of times a client was served- "duplicates". If the Community Crisis Center did indeed report a count of unique individuals served, then more than 11 newly homeless unique individuals came to the Community Crisis Center each day and there was no duplication. This seems hard to fathom given the data reported on page 16 of 224 homeless individuals in Billings in 2020 is now 4,200 homeless individuals at just one agency two years later. This same observation holds true for Family Promise of Yellowstone Valley and Riverstone Health. They each reported to have served nearly 3,000 homeless individuals.

Because of this data reporting confusion, I believe that it is only prudent to either: A. Re- do

the survey with consistent definitions of duplicated or unduplicated individuals, B. Allow Montana Rescue Mission to revise our report to count duplicated individuals and change our number to 50,124, or C. Ask all agencies listed in this report to verify the data to reflect one or the other- duplicated or unduplicated individuals served and follow the same collection rules.

Because Montana Rescue Mission is the largest provider of homeless services in our region, it is hard to imagine that we ranked 6th in your report of the number of homeless individuals served in Billings- unless there was data reported with the incorrect definitions. Furthermore, it is harder to believe that the City of Billings Home ARP Allocation Plan has a good data set on which to make funding allocation recommendations.

Therefore I comment that you should hold off on using this report as a means to allocate funding until the data set is near and each agency reports from the same definitions.

Thank you for consideration,

Sincerely,

Matt

Rev. Matthew Lundgren

*Executive Director*

**Billings Leadership Foundation**

a: 2902 Minnesota Ave, Billings, MT 59101

e: [mattl@billingslf.org](mailto:mattl@billingslf.org)

p: 406.247.0140

c: 406.670.8556

**From:** [Collins, Carly](#)  
**To:** [Matt Lundgren](#)  
**Cc:** [Oksana](#); [Beckett, Brenda](#); [Friday, Wyeth](#)  
**Subject:** RE: Public Comment on City of Billings Home ARP Allocation Plan  
**Date:** Monday, March 06, 2023 12:18:00 PM  
**Attachments:** [Mayor's Letter - HOME-ARP.pdf](#)  
[Service Provider Survey - PAPER FINAL.pdf](#)  
[HOME-ARP Allocation Plan - FINAL DRAFT.pdf](#)  
[MRM - Checking Data.pdf](#)

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Good afternoon,

Thank you for submitting feedback and public comment. The comment will be included, with the City's official response, in an appendix in the HOME-ARP allocation plan.

In response to your concerns regarding the accuracy of data and reporting, please note the following:

**The HOME-ARP allocation plan has a specific HUD-designed format** including a pre-prescribed needs assessment based on defined qualifying populations.

- The plan will not assess and address all community needs relative to those experiencing or at-risk of homelessness.
- Findings and recommendations are specific to eligible activities funded by HOME-ARP and will not address the needs of the community at-large.

**One cohesive dataset characterizing the needs of all qualifying populations in Billings does not exist.** Unfortunately, the nature of homelessness, housing instability, and those fleeing violent circumstances does not support detailed data-gathering efforts. Staff made every effort to garner relevant, current data from community partners, organizations serving qualified populations, published studies, and widely utilized datasets. HUD references specific, older, data sets to determine needs in HOME-ARP regulatory guidance. Unfortunately, these datasets precede the coronavirus pandemic.

**Agencies serving qualifying populations may have duplicated data in survey responses**, although survey instructions clearly:

- Defined qualifying populations in separate categories.
- Requested data on unduplicated number of individuals and families (*see plan appendices*):
  - Mayor's Cover Letter:
    - "The City must evaluate the current needs and service gaps for all qualifying populations. It is imperative that organizations provide accurate data about the number of unduplicated individuals and families served, as well as services provided over the past 12 months."
  - Survey Instrument (six separate instances):
    - "Please enter the total unduplicated number of people the organization served in the PAST 12 MONTHS for each of the following populations."


A narrative of these extenuating factors exists within the body of the Allocation Plan. This is also conveyed through data as reported by organizations in the **Survey Charts** included in the



In response to the following requests: "A. Re- do the survey with consistent definitions of duplicated or unduplicated individuals, B. Allow Montana Rescue Mission to revise our report to count duplicated individuals and change our number to 50,124, or C. Ask all agencies listed in this report to verify the data to reflect one or the other- duplicated or unduplicated individuals served and follow the same collection rules."

**Please note:** The drafted HOME-ARP allocation plan does not commit funding to specific organizations, and it does not include preferences relative to qualified populations served. The plan proposes to dedicate funding to all the eligible activities noted in the HOME-ARP regulation; HOME-ARP funding to supportive services; and utilize the City's Affordable Housing Development program for public facility (shelter) and rental housing development. After HUD approves the plan, staff will begin developing procedures and an application process for supportive services. The City Council will make decisions on what to award applicants in another, separate process.

Thanks again for your comment and feedback.

 <p><b>Billings</b> PLANNING &amp; COMMUNITY SERVICES</p>	<p><b>Carly Collins, Grants Coordinator</b> Department of Planning and Community Services <a href="mailto:carly.collins@billingsmt.gov">carly.collins@billingsmt.gov</a></p>
<p><a href="http://billingsmt.gov/ComDev">billingsmt.gov/ComDev</a></p>	<p>2023 Program North Hill Town Project # 2023-001 PROJECT BIDDING</p>

---

**From:** Dianne Lehm <[Dianne@bigskyeda.org](mailto:Dianne@bigskyeda.org)>

**Sent:** Friday, March 03, 2023 3:11 PM

**To:** Collins, Carly <[collinsc@billingsmt.gov](mailto:collinsc@billingsmt.gov)>

**Subject:** [EXTERNAL] RE: City of Billings HOME -ARP Allocation Plan - Available for Review & Public Comment

Hello Carly,

In reviewing the data and the recommendations, I'm curious on the thought process behind allocations of funds to support services versus new housing development. Both seem equally important to me. One of Big Sky Economic Development strategic priorities related to downtown housing. I would really love to see the downtown core have affordable housing within walking distance of essential services and jobs.

Any information you could provide would be helpful in understanding the allocations.

Thank you,

Dianne









1500 Chowen Springs Loop  
Great Falls, MT 59405-2564  
Office: 406-453-4311  
Fax: 406-727-5566  
TDD: 406-453-6327  
e-mail: [gfa@gfhousing.org](mailto:gfa@gfhousing.org)  
Website: [www.gfhousing.org](http://www.gfhousing.org)

March 3, 2023

Billings Planning & Community Services  
Carly Collins, Grants Coordinator  
2825 3<sup>rd</sup> Avenue North, 6<sup>th</sup> Floor  
Billings, Montana 59101

Ms. Collins,

Rents and home prices have seen a steady increase since the pandemic and these costs continue to rise. President Biden has urged local municipalities and states to put some of this federal aid towards housing programs. As Deputy Treasury Secretary Wally Adeyemo stated, "Increasing the nation's housing supply is essential to lowering shelter costs over the long-term. "The Treasury continues to strongly encourage state and local governments to dedicate a portion of the historic funding available through President Biden's American Rescue Plan toward building and rehabilitating housing in their communities and the actions being announced make it even easier for them to do so."

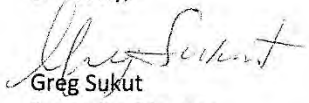
New guidance has been released from the Dept. of Treasury that gives these locals more flexibility to use these funds to expand affordable housing. In an article from Route Fifty, it states data through March 2022 that more than 600 state and local governments had budgeted 12.9 billion of the recovery funds on housing, including 4.2 billion for affordable housing.

In looking at the needs in Billings, waiting lists at HomeFront increasing by 300 families per month, the City Council declaring Affordable Housing a City Priority, and data from the Billings Association of Realtors showing Billings needs to build over 1200 housing units per year to keep up with current needs; this is a housing crisis.

In the State of Montana alone, 15 million dollars of Fiscal Recovery Funds have been used for Affordable Housing.

Please consider Affordable Housing a top priority in your HOME-ARP Allocation Plan.

Sincerely,

  
Greg Sukut  
Executive Director  
Great Falls Housing Authority  
Great Falls, MT



**From:** [Collins, Carly](#)  
**To:** ["Greg Sukut"](#)  
**Subject:** RE: Letter Public Comment on HOME-ARP Plan  
**Date:** Wednesday, March 08, 2023 1:42:00 PM

---

Hello Greg,

Thank you for submitting feedback and public comment. The comment will be included, with the City's official response, in an appendix in the HOME-ARP allocation plan.

In response to your comment, staff is recommending funding housing development through the City's existing Affordable Housing Development program ([billingsmt.gov/ahdinfo](http://billingsmt.gov/ahdinfo)), which currently has over \$1 million to allocate. If the City Council approves additional FY23-24 funding for this program, over \$2 million will be available for housing development.

This recommendation gives housing developers much more freedom to create financially viable developments without the City monitoring all referrals, qualifying population admissions, application denials, etc., for HOME-ARP "qualifying populations" for at least 15 years. It also allows housing developers access to HOME-ARP supportive services funding (including staff costs) to further assist their tenants.

Thank you again for your input.

Respectfully,

Carly Collins, Grants Coordinator  
Community Development Division  
[collinsc@billingsmt.gov](mailto:collinsc@billingsmt.gov)  
[billingsmt.gov/ComDev](http://billingsmt.gov/ComDev)  
2825 3rd Ave. North, 6th Floor  
Billings, MT 59101  
P 406.247.8675

City of Billings email messages and attachments are subject to the Right to Know provisions of Montana's Constitution (Art. II, Sec. 9) and may be considered a "public record" pursuant to Title 2, Chapter 6, Montana Code Annotated. As such, this email, its sender and receiver, and the contents may be available for public disclosure and will be retained pursuant to the City's record retention policies. Emails that contain confidential information such as information related to individual privacy may be protected from disclosure under law. This message is intended for the use of the individual or entity named above. If you are not the intended recipient of this transmission, please notify the sender immediately, do not forward the message to anyone, and delete all copies. Thank you.

**From:** Patti Webster <[PattiW@homefrontmt.org](mailto:PattiW@homefrontmt.org)>  
**Sent:** Friday, March 03, 2023 10:16 AM  
**To:** Collins, Carly <[collinsc@billingsmt.gov](mailto:collinsc@billingsmt.gov)>; Friday, Wyeth <[FridayW@billingsmt.gov](mailto:FridayW@billingsmt.gov)>; Kukulski, Chris <[kukulskic@billingsmt.gov](mailto:kukulskic@billingsmt.gov)>; Council <[council@billingsmt.gov](mailto:council@billingsmt.gov)>; Girard, Jacqueline M <[Jacqueline.M.Girard@hud.gov](mailto:Jacqueline.M.Girard@hud.gov)>  
**Cc:** Carol Burton <[cburton2173@gmail.com](mailto:cburton2173@gmail.com)>; Edward Hammer <[erhammersr@gmail.com](mailto:erhammersr@gmail.com)>; Hannah Reno <[hreno@kw.com](mailto:hreno@kw.com)>; Patti Webster <[PattiW@homefrontmt.org](mailto:PattiW@homefrontmt.org)>; Phyllis Crawford <[phylliscrawford2021@gmail.com](mailto:phylliscrawford2021@gmail.com)>; Sheri Herman ([fishingmontana16@gmail.com](mailto:fishingmontana16@gmail.com)) <[fishingmontana16@gmail.com](mailto:fishingmontana16@gmail.com)>; Tafuna Tusi <[taftusi@gmail.com](mailto:taftusi@gmail.com)>; [tboos@billingsfcu.org](mailto:tboos@billingsfcu.org)  
**Subject:** [EXTERNAL] RE: City of Billings HOME-ARP Allocation Plan - Available for Review & Public Comment  
**Importance:** High

Good Morning,

I received this email on a Saturday, February 25, 2023 at 5:01 pm.

There are only 10 business days and 16 calendar days, from the date of the email to the City Council public hearing on March 13, 2023.

This is not adequate time to respond appropriately nor does it lend to collaboration, partnerships and community goodwill.

Given this short timeline, there is not adequate time for the HomeFront Board to provide public comment and I respectfully request that you extend the public comment deadline to a **minimum of 30 days** that will allow the HomeFront Board (which is critical to the housing issues in Billings) the opportunity to respond appropriately.

It doesn't make sense to move forward with any plan that doesn't have feedback from the Board of the largest housing provider, affordable housing developer and management company in the City of Billings.

Please consider this email as public comment.

Respectfully,



Formerly  
Housing  
Authority of  
Billings

**Patti**  
**Patti Webster, CME, SHMP**  
(she, her, hers)  
Chief Executive Officer/Executive Director  
Phone: 406.237-1916  
Fax: 406-237-1956  
Email: [pattiw@homefrontpartners.org](mailto:pattiw@homefrontpartners.org)  
2415 First Avenue North  
Billings, MT 59101  
[www.homefrontpartners.org](http://www.homefrontpartners.org)



From: Collins, Carly

To: Patti Webster

Cc: Carol Burton ; Edward Hammer; Hannah Reno; Phyllis Crawford ; Sheri Herman (fishingmontana16@gmail.com); Tafuna Tusi; tboos@billingsfcu.org; Beckett, Brenda; Friday, Wyeth; Kukulski, Chris; council@billingsmt.gov; Girard, Jacqueline M; Bohlman, Denise

Subject: RE: City of Billings HOME-ARP Allocation Plan - Available for Review & Public Comment

Date: Monday, March 06, 2023 11:11:00 AM

Attachments: HomeFront - Survey Deadline Extension.pdf

Hi Patti,

Thank you for submitting feedback and public comment. The comment will be included, with the City's official response, in an appendix in the HOME-ARP allocation plan.

We sincerely apologize for issues the 15-day public comment period poses for HomeFront. Delays in garnering survey responses from service providers, including HomeFront, pushed the timeline forward by six weeks (*see attached*). The same month the survey was released, HUD published a [new deadline for plan submission](#) (March 31) that significantly shortened the public participation process.

To accommodate your request, we have extended the public comment period to **March 20**. This provides a 24-day public comment period, exceeding the 15-day regulatory requirement. Extending the public comment period beyond March 20 is not possible due to limited staff availability.

**Please note:** The drafted HOME-ARP allocation plan does not commit funding to specific organizations, and it does not include preferences relative to qualified populations served. The plan proposes to dedicate funding to all the eligible activities noted in the HOME-ARP regulation; HOME-ARP funding to supportive services; and utilize the City's Affordable Housing Development program for public facility (shelter) and rental housing development. After HUD approves the plan, staff will begin developing procedures and an application process for supportive services. The City Council will make decisions on what to award applicants in another, separate process.

We began collaborative efforts with HomeFront in October 2022 for this project. Please see the timeline as follows:

- **October 12, 2022:** Hard copy survey and online survey link sent to service providers
- **October 31, 2022:** HUD [publishes new deadline](#) for HOME-ARP allocation plan submission – March 31, 2023
- **November 14-18, 2022: Survey Deadline**
- **December 30, 2022: Extended Survey Deadline**
- **January & February 2023:** Data analysis, research, and plan development
- **February 23, 2023:** City Council memo due
- **February 25, 2023:** Drafted plan published – public comment begins
- **March 13, 2023:** City Council action
- **March 20, 2023: Extended public comment period ends**
- **March 31, 2023:** Deadline for allocation plan submission

Thanks again for your comment and feedback.

Respectfully,



**Carly Collins, Grants Coordinator**  
Community Development Division  
[collinsc@billingsmt.gov](mailto:collinsc@billingsmt.gov)

**From:** [Michael McManus](#)  
**To:** [Collins, Carly](#)  
**Subject:** [EXTERNAL] City of Billings HOME-ARP Allocation Plan Review  
**Date:** Monday, March 06, 2023 10:28:06 AM  
**Attachments:** VNN summary v02.18.23.pdf  
Stories of Honor - BF.pdf  
Bio 01.31.23.pdf

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Good morning Carly.

After reviewing the plan I have the following input:

- Veterans Navigation Network (<https://www.veteransnavigation.org/our-mission>; <https://www.facebook.com/VetNavNet>) isn't part of coordinated entry, have funding for housing, use HMIS, etc., basically we're not a homeless service provider. We do try to attend COC meetings.
- VNN's mission is to facilitate a smooth transition from military service to civilian life through one-on-one resource counseling, case management, and peer mentorship for the military veteran community of Montana.
- Even though we aren't a homeless service provider, we do work with several like VOA Independence Hall, VOA/SSVF, Veterans Inc./SSVF, the MT Rescue Mission, etc. assisting them resource counseling of veterans. Most veterans, even those with a Other Than Honorable or Bad Conduct discharge can be helped by SSVF, but not by every program, and a vet can't receive other VA benefits like disability compensation, a benefit that could certainly help a homeless or at risk of homelessness vet with additional "income".

We also directly assist veterans changing military records and in upgrading their discharges.

I've attached some background on our founder/chairman Blake Fuhriman, VNN, and myself.

Basically, I just want you and the city to know what VNN is and how we can assist homeless service providers and homeless/at risk of homelessness veterans and family members.

Please let me know if you have any questions.

Have a good day.

Mike

Mike McManus  
Program Coordinator, Veterans Navigation Network  
Senior Master Sergeant (retired), USAF  
County Veteran Service Officer (retired)  
(406) 435-9308  
[mike@veteransnavigation.org](mailto:mike@veteransnavigation.org)  
<https://www.veteransnavigation.org/>  
<https://www.facebook.com/VetNavNet>





**From:** [Georgia Cady](#)  
**To:** [Collins, Carly](#)  
**Subject:** [EXTERNAL] HOME-ARP Allocation  
**Date:** Tuesday, March 07, 2023 9:27:58 AM  
**Attachments:** Outlook-1520975848.png

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Good Morning,

I am the Executive Director at Tumbleweed and the affordable housing shortage in Yellowstone County effects the work we do at Tumbleweed every day.

As providers serving people experiencing homelessness, our community as adopted the Housing First model wherein we first strive to end homelessness as quickly as possible, and then wrap the needed services around the individual's experiencing homelessness. However, when there are not sufficient affordable units to rent, when fair market rent increases by at least 10% in the past year across all units in our area, and when the only "hope" that we have for our barriered population is to hopefully convince a private landlord that they are a safe candidate to rent to; the best use of these funds would seem to be constructing additional affordable units.

Supportive Services are wonderful tools that afford our homeless neighbors the opportunity to more easily carry out needed daily activities. Allowing them to obtain bus passes, phone minutes, hygiene assistance, etc., but what they do not do is turn the dial in such a way that dramatically changes the trajectory of someone's life. We are able to find \$28.00 within our agency for a bus pas if someone is going to lose their job because they cannot get to work tomorrow. We cannot as easily produce a one-bedroom unit that our formerly incarcerated, entry-level client can afford without a significant amount of time, application fees and luck. Time is the most important expense, as our client's experiencing homelessness grow more hopeless by the day, they grow more hopeless when each application is denied, by each additional day that the trauma of homelessness continues to impact their lives.

In short, our view is that additional units are the best use of these HOME funds for all of the aforementioned reasons. A home is what ends homelessness.

The following is from endhomelessness.org:

### **Does Housing First work?**

There is a large and growing evidence base demonstrating that Housing First is an effective solution to homelessness. Consumers in a Housing First model access housing faster and are more likely to remain stably housed. This is true for both PSH and rapid re-housing programs. PSH has a one-year housing retention rate of up to 98 percent. Studies have shown that rapid re-housing helps people exit

homelessness quickly—in one study, an average of two months—and remain housed. A variety of studies have shown that between 75 percent and 91 percent of households remain housed a year after being rapidly re-housed.

More extensive studies have been completed on PSH finding that clients report an increase in perceived levels of autonomy, choice, and control in Housing First programs. A majority of clients are found to participate in the optional supportive services provided, often resulting in greater housing stability. Clients using supportive services are more likely to participate in job training programs, attend school, discontinue substance use, have fewer instances of domestic violence, and spend fewer days hospitalized than those not participating.

I appreciate your attention to the housing shortage crisis we are facing.

Georgia J. Cady

Executive Director

[505 N. 24th St., Billings, MT 59101](#)

Phone: (406) 259-2558

Cell: (406) 696-2775

Fax: (406) 259-3681



**Tumbleweed**  
Lasting Change for Vulnerable Youth

"Tumbleweed provides safety, assistance and hope to our community's vulnerable and homeless youth creating lasting life changes."

This e-mail is **confidential** and contains information intended only for the individual to whom it is addressed. You should not disseminate, distribute or copy this e-mail. Please notify the sender if you have received this e-mail by mistake.



Hi Georgia,

In response to your comment, staff is recommending funding housing development through **the City's existing Affordable Housing Development program**, which currently has over **\$1 million to allocate**. If the City Council approves additional FY23-24 funding for this program, over **\$2 million will be available for housing development**.

If you have questions about the [Affordable Housing Development program](#), please contact Dina Harmon at [harmond@billingsmt.gov](mailto:harmond@billingsmt.gov) or call 406-657-3045.

Thank you again for your input.

Respectfully,

[illegible]

2593-302-480, ext. 577-777

2025-2026

1947357

[illegible]



**From:** [Kari Boiter](#)  
**To:** [Collins, Carly](#)  
**Cc:** [Kody Christensen-Linton](#); [Keely McCave](#); [Ann Treece \(annt@step-inc.org\)](#); [Alyssa Hutchinson](#); [Catherine Card](#); [D'Anthony Willis](#); [Debbie Brown](#); [Farrar-Neary, Marcee A.](#); [Patti Webster](#); [Ryan Staggs](#); [Taylor Papka](#); [Terri Todd](#)  
**Subject:** [EXTERNAL] Re: City of Billings HOME-ARP Allocation Plan - Available for Review & Public Comment  
**Date:** Thursday, March 09, 2023 1:08:33 PM

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Hi Carly,

I am writing on behalf of the Board of Directors for the Continuum of Care (cc'd) regarding the draft **HOME-ARP Allocation Plan**. We wish to submit a unified response to this document as part of the public comment process, but cannot do so by the 3/13 deadline. Is it possible for this deadline to be extended to the end of the month? Any additional time that the City can provide is greatly appreciated.

The Yellowstone County CoC wishes to be as helpful as possible during this process, strengthening the ongoing partnership with the City of Billings. In doing so, it's important to note errors contained within the document as it is presently drafted. One example, on Page 24, presently says:

*In September 2022, Billings City Council approved the use of public safety mill levy funds totaling \$510,000 to operate a seasonal low barrier emergency shelter over a two-year period.*

Respectfully, this is incorrect. City Council ultimately awarded the CoC funding in the amount of \$210,000 (not \$510,000) and it was to operate a seasonal shelter for *this year only* (not a two-year period). I am certain there are other areas in which the CoC and its partners can help clarify and/or improve the City's draft plan. The example above is one that stands out most starkly.

Please kindly consider our request for additional time to submit public comment, so that we can be as thorough as possible while submitting a unified response on behalf of the Yellowstone County CoC.

Thank you,

**Kari Boiter**

Kari Boiter (she/her/hers)  
President, Board of Directors  
Yellowstone County Continuum of Care  
Phone: (406) 544-9164  
Email: [kariboiter@gmail.com](mailto:kariboiter@gmail.com)

**From:** [Collins, Carly](#)  
**To:** [Kari Boiter](#)  
**Cc:** [Kody Christensen-Linton](#); [Keely McCave](#); [Ann Treece \(annt@step-inc.org\)](#); [Alyssa Hutchinson](#); [Catherine Card](#); [D'Anthony Willis](#); [Debbie Brown](#); [Famar-Neary, Marcee A.](#); [Patti Webster](#); [Ryan Staggs](#); [Taylor Papka](#); [Terri Todd](#)  
**Subject:** RE: [EXTERNAL] Re: City of Billings HOME-ARP Allocation Plan - Available for Review & Public Comment  
**Date:** Friday, March 10, 2023 9:40:00 AM


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Hi Kari,

Thank you for submitting this feedback. I have updated the information regarding the seasonal shelter.

The public comment period has been extended through March 20<sup>th</sup>, but cannot be extended any further due to limited staff availability. Please feel free to provide any additional comment or feedback through the 20<sup>th</sup>. Comments will be included, with the City's official response, in an appendix in the HOME-ARP allocation plan.

Respectfully,

 <b>Billings</b> PLANNING & COMMUNITY SERVICES	<b>Carly Collins, Grants Coordinator</b> Community Development Division 
<a href="http://billingsmt.gov/ComDev">billingsmt.gov/ComDev</a>	2503 Broadway, North 5 <sup>th</sup> Floor Billings, MT 59101 P: 406-594-5677

The City of Billings is a proud member of the Montana Department of Transportation (MDOT) and is committed to providing safe and reliable transportation for all. We are currently seeking feedback from the community on the proposed allocation plan for the HOME-ARP funds. We encourage you to provide your input by March 20th. Your feedback will be used to inform the final allocation plan. For more information, please visit [billingsmt.gov/ComDev](http://billingsmt.gov/ComDev).





**From:** [Teddi Shorten](#)  
**To:** [Collins, Carly](#)  
**Subject:** [EXTERNAL] HOME-ARP Allocation Plan comment  
**Date:** Friday, March 10, 2023 4:59:24 PM

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Hello Carly, I am confused about why the HOME-ARP Allocation Plan is saying, on page 47 that "The City of Billings will not be proposing the production or support of additional affordable rental units". Why in the world would our city say that it doesn't support creating more affordable rental units? I work have worked for HomeFront for over 22 years. I have seen the need go up and go down during this time. BUT what is happening in Billings right now is so scary to the average working person. They can't find any units to rent that would be considered affordable. 1 bedroom units go for \$625 to \$895 a month plus utilities. 2 bedroom units are between \$695 and \$1,350 plus utilities. As an example my adult daughter has to live in Acton because she is unable to secure affordable housing in Billings. I work with families everyday that are frantic in their search for affordable, safe and decent rent housing for their families. Isn't that why we have governments? Isn't that why Congress gives our communities money to create or procure affordable housing?

How can families with children get an affordable place when they cost so much? You can do the math and see they would pay more that 30% and even up to 70% of their income just on a place to live. The shelters in our town only have so much room and it is always a temporary fix at best.

Having a place to live is the best way to keep workers employed and for companies to have a stable work force so it benefits EVERYONE!

I understand support services are important, BUT they work better if the person using the support services have a place to live they can afford. A place they feel safe in.

The second comment in the HOME-ARP Allocation Plan on page 47 says "The City of Billings does not have an affordable rental housing production goal that will utilize HOME-ARP funds" isn't true! HomeFront it a working partner with the City of Billings to create a housing strategy for Billings and we have plans for affordable we have shown and worked with the City to develop! I think the City of Billings should be a leader in this area. We are the biggest City in Montana and we need to lead the way to affordable housing solutions that other Montana cities can follow. The need for affordable rental units is in every community across our State.

THE BEST WAY TO STOP HOMELESSNESS IN BILLINGS IS TO CREATE MORE AFFORDABLE RENTAL HOUSING!

Teddi Shorten  
Chief Occupancy Director  
HomeFront  
Phone: 406.237.1911  
FAX: 406.237.1951  
[teddis@homefrontpartners.org](mailto:teddis@homefrontpartners.org)

**From:** [Collins, Carly](#)  
**To:** [Teddi Shorten](#)  
**Cc:** [Beckett, Brenda](#); [Friday, Wyeth](#)  
**Subject:** RE: HOME-ARP Allocation Plan comment  
**Date:** Friday, March 17, 2023 8:23:00 PM

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Hello Teddi,

Thank you for your comments on the HOME-ARP allocation plan. Your comments, and the City's response, will be added to the HOME-ARP allocation plan. The thought and effort you put into this email is appreciated. We recognize HomeFront as the local, lead administrative agency for federally-funded housing assistance programs.

The City's support to HomeFront is evident through the commitment of over \$2 million in federal funding to support tenant-based rental assistance and the development of 95 housing units.

The City's recommendation to fund supportive services with HOME-ARP and Affordable Housing Development, with CDBG and HOME, supports the overarching goal HUD envisioned with the ARP. It is also feasible given the very small allocation awarded by HUD. The majority of rental units developed with HOME-ARP (at least 70%) must be continually occupied by qualifying populations who will not be able to pay rent. The City cannot ethically support funding a financially unstable project where the majority of tenants, if not all, do not have the ability to pay rent (for a minimum 15-year compliance period).

Please see the following references HUD makes in the [final rule](#):

*Most HOME-ARP qualifying households will be unable to pay a rent that covers allocated debt service or operating costs, requiring PJs to use other techniques to determine that HOME-ARP units are affordable and that projects containing HOME-ARP units are sustainable throughout the minimum compliance period. (Page 21).*

We look forward to seeing the new housing developments HomeFront creates with the \$13 million garnered from selling 54 properties to Wedgewood Homes, a California company. While HomeFront eliminated over 50 units of affordable housing stock in Billings, the potential to develop additional units would be a great advantage long-term.

I also wanted to provide some follow up regarding your questions and the following comments:

I am confused about why the HOME-ARP Allocation Plan is saying, on page 47 that "The City of Billings will not be proposing the production or support of additional affordable rental units". Why in the world would our city say that it doesn't support creating more affordable rental units?

The City did not state that it does not support creating more affordable rental units. Contrarily, the City is proposing continued use of the current Affordable Housing Development program to create more affordable housing units. The City's statement is specific to using HOME-ARP funding to develop units due to project unsustainability. Full quote from the Plan: "The City of Billings will not be proposing the production or support of additional rental housing units **with HOME-ARP Funds**".



The City of Billings, and Community Development staff, support the development of affordable rental units. The City also supports housing developers, like HomeFront, by offering available funding through the Affordable Housing Development program. However, City staff cannot ethically recommend or allocate funding to unsustainable housing projects without also being able to commit substantial, ongoing support to meet compliance minimums.

Isn't that why we have governments? Isn't that why Congress gives our communities money to create or procure affordable housing? How can families with children get an affordable place when they cost so much?

HomeFront is the local administrative agency for federally-funded housing assistance programs and receives millions of federal dollars annually to support low-income households.

The Community Development Division's role in creating or procuring affordable housing is extraordinarily limited. The City of Billings receives a very small amount of HOME funding each year for housing-related activities (~\$325,000), including the First Time Home Buyer program and affordable housing development. The City also receives an average of \$620,000 per year in CDBG funding to develop viable urban communities for low-income citizens. The primary use for CDBG funding across the nation is for infrastructure.

The second comment in the HOME-ARP Allocation Plan on page 47 says "The City of Billings does not have an affordable rental housing production goal that will utilize HOME-ARP funds" isn't true! This statement is also specific to HOME-ARP funding.

HomeFront it a working partner with the City of Billings to create a housing strategy for Billings and we have plans for affordable we have shown and worked with the City to develop! I think the City of Billings should be a leader in this area. We are the biggest City in Montana and we need to lead the way to affordable housing solutions that other Montana cities can follow. The need for affordable rental units is in every community across our State. THE BEST WAY TO STOP HOMELESSNESS IN BILLINGS IS TO CREATE MORE AFFORDABLE RENTAL HOUSING!

**HomeFront is the local administrative agency for federally-funded housing assistance programs and leads efforts to develop coordinated housing strategies.** The Billings City Council dedicated funding to support Affordable Housing Development and City staff participates in affordable housing strategy meetings.

Thank you again for your comments and feedback,



[billingsmt.gov/ComDev](http://billingsmt.gov/ComDev)

**Carly Collins, Grants Coordinator**

Community Development Division

[carly.collins@billingsmt.gov](mailto:carly.collins@billingsmt.gov)

2607 1st Avenue North, 3rd Floor

Billings, MT 59101

**From:** [jacknickels55@gmail.com](mailto:jacknickels55@gmail.com)  
**To:** [Council; Cole, Bill](#)  
**Cc:** [jacknickels55@gmail.com](mailto:jacknickels55@gmail.com)  
**Subject:** [EXTERNAL] HOME ARP funding support letter  
**Date:** Sunday, March 12, 2023 3:14:12 PM  
**Attachments:** [image001.png](#)  
[March 10th - Affordable housing letter - ARP FUNDS - 2.docx](#)

---

To: Billings City Council Members  
From: Jack Nickels – Realtor and community volunteer  
Re: Home ARP allocation

Dear City Council Members:

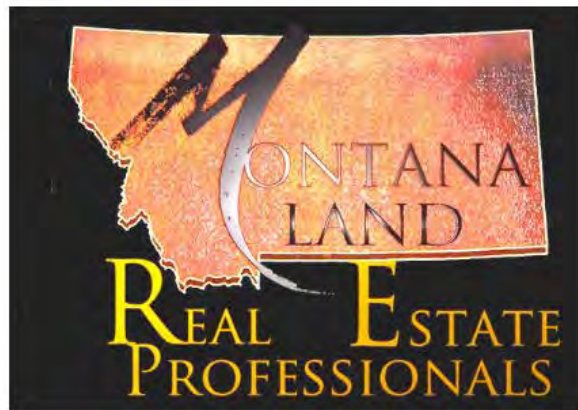
I am writing to you today in support of allocating current HOME ARP funds to address Billings increasing need for affordable housing. This is not, as we all know, a local problem; it is a serious national problem and unless city, state, and national leaders take action to address the extreme housing shortage in this country, it will only get worse. We have all seen the pictures and read the news articles about what some of our major cities like Los Angeles, San Francisco, Portland, and Seattle are dealing with. However, Montana and Billings are not immune to this problem. Currently according to state statistics, Billings has over 7,000 individuals and families on a waiting list for some form of affordable housing and that number has continues to climb, and according to a recent report published by CNN, we have underbuilt affordable housing in this country between 2012-2022, but almost 6.5 million units. Billings can no longer afford to neglect the issue if it is to retain what workers it has or attract talented workers in the future as well as assure that the next generation can afford to live in comfortable, safe affordable housing. The American dream of owning your own home, is being replaced by multi-generational families living in the same home, ever increasing rental rates and a drastic increase in homelessness.

I have lived in Billings for the last 21 years as well as being a Realtor for the last 18 years and involved as a volunteer in our community. I have seen and experienced the need every day. With that in mind. I support wholeheartedly the use of these funds to address the affordable housing issue in our community. However, I would also ask at the same time, that the city of Billings become a leader in not only the development of more affordable housing, but also in finding innovative ways of encouraging developer to look more favorability at the construction of project that in the longer term could be owner occupied. It is key that the city creates not only funding, but also zoning and project development incentives moving forward.

In closing I will say this. I have been involved in affordable housing development advocacy for over 30 years mostly in association with a non-profit known as Artspace Projects, who has developed over 50+ creative affordable housing project throughout the United States, and I have seen how innovative private/public partnerships have led to the creation of some unique affordable housing projects throughout the United States, by thinking outside the box. I urge you to not only approve this allocation, but also to look at possibly setting aside a portion of the funds to be used to fund an innovative program geared to encouraging developers to step up to the plate to bring more affordable housing to Billings and more to the point to the downtown area of Billings, which would serve to help with the continued development of our downtown as well.



*Jack Nickels*



1148 16<sup>th</sup> Street West, Suite 16  
Billings MT. 58102  
Phone: 406-672-6936  
Email: [jacknickels55@gmail.com](mailto:jacknickels55@gmail.com)

DRAFT

**From:** [Collins, Carly](#)  
**To:** [jacknickels55@gmail.com](mailto:jacknickels55@gmail.com)  
**Cc:** [Beckett, Brenda](#); [Friday, Wveth](#)  
**Subject:** HOME-ARP Comment Response  
**Date:** Tuesday, March 21, 2023 12:11:00 PM

Hello Mr. Nickels,

Thank you for submitting feedback and public comment regarding HOME-ARP funds. The comment will be included, with the City's official response, in an appendix in the HOME-ARP allocation plan.

The City understands the need for affordable housing; however, the City of Billings is not a housing provider, nor a housing developer. The City maintains an Affordable Housing Development program and housing development organizations are welcome to apply at any time. More information can be found here: [www.BillingsMT.gov/chdo](http://www.BillingsMT.gov/chdo). Additionally, HOME-ARP funding can only be allocated towards eligible activities. This funding is not able to support the development of owner-occupied housing units and must be viable, accessible, and affordable to income eligible renters for at least 15 years.

Thank you again for your insight and recommendations.

Respectfully,

	<p><b>Carly Collins, Grants Coordinator</b>          Community Development Director  <a href="mailto:carly.collins@billingsmt.gov">carly.collins@billingsmt.gov</a></p>
<p><a href="http://billingsmt.gov/ComDev">billingsmt.gov/ComDev</a></p>	<p>2507 Ave. of the Arts, 3rd Floor          Billings, MT 59101          P 406.257.8877</p>

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### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

HUD

**5b. Federal Award Identifier:**

M21-MP300213

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** City of Billings

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

816001237

**\* c. UEI:**

LVG1L245LE95

**d. Address:**

**\* Street1:**

PO Box 1178

**Street2:**

**\* City:**

Billings

**County/Parish:**

**\* State:**

MT: Montana

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

59103-1178

**e. Organizational Unit:**

**Department Name:**

Planning & Community Services

**Division Name:**

Community Development Division

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

**\* First Name:**

Brenda

**Middle Name:**

**\* Last Name:**

Beckett

**Suffix:**

**Title:**

**Organizational Affiliation:**

**\* Telephone Number:**

406-657-8286

**Fax Number:**

**\* Email:**

beckettb@billingsmt.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

US Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

### \* 12. Funding Opportunity Number:

HOME Investment Partnership Program

\* Title:

HOME Investment Partnership Program (HOME-ARP)

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Activities noted in the City of Billings HOME-ARP Allocation Plan

Attach supporting documents as specified in agency instructions

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

MT-001

\* b. Program/Project

MT-001

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

04/01/2023

\* b. End Date:

09/30/2030

**18. Estimated Funding (\$):**

\* a. Federal

1,211,321.00

\* b. Applicant

0.00

\* c. State

0.00

\* d. Local

0.00

\* e. Other

0.00

\* f. Program Income

0.00

\* g. TOTAL

1,211,321.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

\* First Name: Chris

Middle Name: A.

\* Last Name:

Kukulski

Suffix:

\* Title:

City Administrator

\* Telephone Number:

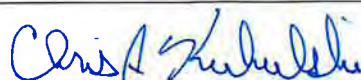
406-657-8430

Fax Number:

\* Email:

kukulskic@billingsmt.gov

\* Signature of Authorized Representative:



\* Date Signed:

3-22-23

## HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

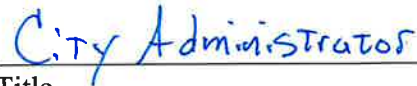
**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official



Date



Title

**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**


**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.



9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Administrator
APPLICANT ORGANIZATION City of Billings	DATE SUBMITTED 3-22-23

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Administrator
APPLICANT ORGANIZATION City of Billings	DATE SUBMITTED 3-22-23