



State of Montana

HOME-ARP Allocation Plan

Public Comment Period

January 17, 2023 – February 17, 2023

Montana Department of Commerce

DOCConPlan@mt.gov

<https://commerce.mt.gov/Consolidated-Plan>

2020–2024 Montana Consolidated Plan
for Housing and Community Development

Plan Year 1 (2020)	April 1, 2020 – March 31, 2021
Plan Year 2 (2021)	April 1, 2021 – March 31, 2022
Plan Year 3 (2022)	April 1, 2022 – March 31, 2023
Plan Year 4 (2023)	April 1, 2023 – March 31, 2024
Plan Year 5 (2024)	April 1, 2024 – March 31, 2025

Commerce will make reasonable accommodations for persons with disabilities or persons with limited English proficiency who wish to participate in this process and need an alternative accessible format of presentation materials or translation services. If you require an accommodation, please contact Commerce at DOCConPlan@mt.gov no later than 5:00 p.m. on January 20, 2023.

El Departamento de Comercio hará adaptaciones razonables para las personas con discapacidades o personas con dominio limitado del inglés que deseen participar en este proceso y necesiten un formato accesible alternativo de materiales de presentación o servicios de traducción. Si necesita una adaptación, comuníquese con El Departamento de Comercio en DOCConPlan@mt.gov antes de las 5:00 p.m. del 20 de enero de 2023.

DOCConPlan@mt.gov

Phone: (406) 841-2770

Fax: (406) 841-2771

TDD: (800)-841-2702

Montana Relay Services number: 711

State of Montana HOME-ARP Allocation Plan

April 2023

The State of Montana Department of Commerce (Commerce) is eligible to receive \$11.46 million in federal funding from U.S. Department of Housing and Urban Development (HUD) to assist individuals who are homeless, at risk of homelessness, fleeing or experiencing domestic violence, and in other similar situations with their housing needs. These funds can be used to develop affordable housing, provide supportive services, reduce homelessness, and increase housing stability across Montana. This document, the State of Montana HOME-ARP Allocation Plan, summarizes how these funds will be allocated in Montana. Note the Cities of Billings, Great Falls and Missoula each received separate HOME-ARP allocations directly from HUD.

HUD Notice CPD-21-10 states that HOME-ARP funds are to benefit “qualifying populations”, which are defined as:

- Homeless individuals and families;
- Individuals and families who are extremely low income and do not have sufficient resources or support networks (family, friends, faith-based organizations) to prevent them from becoming homelessness and are living in temporary housing situations;
- Those who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking;
- Other residents who need resources to prevent homelessness and/or have the greatest risk of housing instability.
- Veterans are included in the qualifying populations among the above categories.

Consultation

Before developing its HOME-ARP allocation plan, states must consult with:

- Continuums of Care serving the state,
- homeless service providers,
- 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.

States are not required to consult with every PHA or CoC.

Describe the consultation process including methods used and dates of consultation:

Consultation took place from Summer 2021 to Winter 2023 and was primarily conducted by virtual meetings with diverse organizations and agencies that represent and serve qualifying populations throughout the state.

Commerce staff presented an overview of the HOME-ARP program to state legislators on October 27, 2021 as part of the Economic Transformation and Stabilization and Workforce Development Programs and Advisory Commission (EWAC) public hearing process and has continued to keep that Commission updated on progress toward the submission of this Plan to HUD. On September 20, 2022, Commerce presented the results of its survey, its consultation process, and data regarding qualifying populations in Montana. Those public meetings were held in person at the state capitol with the ability for interested parties to attend virtually.

Commerce staff also presented the HOME-ARP overview to the statewide Continuum of Care board members, to the statewide Human Resource Development Council Association, to the Interdepartmental Housing Integration Project (IHIP), to the Montana Housing Coordinating Team and to the group of Montana's seven most populous cities that are involved with Housing is Healthcare efforts to identify the Frequent Users Systems Engagement (FUSE) populations in their communities.

Commerce distributed a survey to its Listserv that reaches over 4,000 individuals and organizations requesting 1) information about the unmet housing and service needs of qualifying populations in their area and 2) what eligible activities should be supported with Montana's HOME-ARP allocation. Nearly two-thirds of respondents identified the need for development of rental housing as the top priority, followed by non-congregate shelter. Using HOME-ARP funds for supportive services was the amongst the top three choices for the majority of respondents.

Finally, Commerce staff met one-on-one with a dozen organization and agencies, as listed in the table below. In order to determine what the highest needs of qualifying populations are and how HOME-ARP funds could help address the gaps between available resources and needs, Commerce staff asked representatives to identify:

- which qualifying population(s) their agency or organization serves,
- what current resources they utilize to serve that population,
- the housing needs of the qualifying populations they serve, and
- the supportive service needs of the qualifying populations they serve.

Through consultation and needs assessment, Commerce staff developed its Allocation Plan in preparation for the public participation process.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
MT Continuum of Care	Continuum of Care Serving all qualifying populations, including veterans	Phone Conversation 9-23-22	Rural areas of the state are under served by the statewide CoC. Urban areas that have CoC funds for rental assistance have difficulty in finding suitable rental units.
MT Dept of Corrections	State Agency Serving those at risk of homelessness and who need services to prevent homelessness	Virtual meeting 1-14-2022	Those leaving the state penitentiary have difficulty finding landlords willing to rent to them. Dept of Corrections has rental assistance funds but needs more homes. The highest need is for additional rentals.
MT Dept of Public Health and Human Services – Human and Community Services	State Agency Serving all qualifying populations	Virtual meeting 9-19-22	Need additional affordable rentals that will accept ESG and Housing Choice Vouchers; longer term rental assistance; mental health funding for services so that case managers are able to make referrals more easily.
MT Dept of Public Health and Human Services – Behavioral Health and Devl Disabilities Division	State Agency Serving those who need services to prevent homelessness	Virtual meeting 9-22-22	Recovery homes are in need of repair; those in rural areas need supportive services.
MT Dept of Commerce - Tenant Based Rental Assistance Program	State Public Housing Authority	Virtual meeting 12-9-22	Need for more units where tenant-based vouchers are accepted and that meet property standards and rent standards. This will help improve utilization of all voucher types (Section 8, Section 811, VASH, MERA, etc).
State association of Human Resource Development Councils (HRDCs)	Community Action Agencies Serving all Qualifying Populations, including veterans	In person meeting 9-26-22	There is a lot of need across the state, but short supply of units that pass inspection and are willing to accept rent standards causes the most need.

Samaritan House	Homeless Services Providers	Virtual Meeting 9-27-22	Not enough housing of any sort – need more shelter, transitional and permanent homes. Case managers have very heavy loads and supportive services are a high need.
North Central Independent Living Services Montana Independent Living Project Living Independently for Today and Tomorrow Summit Independent Living	Disability Service Providers	Virtual meeting 9-21-22 Survey responses	Need permanent housing and shelter space with low-barrier entry for those with justice system history; space for personal service/tenant care providers; need for visitable homes and to make home modifications. Supportive services for activities of daily living, as well as mental health services, eviction prevention services, and legal services.
SAFE	Domestic Violence Service Providers	Virtual meeting 10-19-22	Need for more units for emergency shelter and for permanent housing, with and without supportive services; no need for additional TBRA.
Great Northern Development Corporation	Community Development Organization Serving all qualifying populations in rural counties	Virtual meeting 9-22-22	Need for rental units; keeping the existing housing stock maintained, especially properties with rental assistance; financing is difficult from commercial lenders in blighted areas. In the most rural areas of the state, mental health services and substance use treatment is a high need; child and elder care.
Veterans Affairs	Veterans Service Providers	Survey	No response.
Montana Fair Housing	Montana Fair Housing	Survey response	Need for supportive services and accessible housing.

Summarize feedback received and results of upfront consultation with these entities:

Most of the feedback received identified a high need for all types of housing – affordable and market rate, permanent and emergency shelter, newly constructed and rehabilitated – and for all types of supportive services – case management, legal advice and eviction prevention counselling, employment retention and transportation, counselling to address mental health and substance use. All those consulted identified 1) a strong need for increases in affordable housing, particularly for households with extremely low incomes, and 2) a continual gap in homes for unsheltered individuals and families. The survey results lend further support for using HOME-ARP funds for rental housing and then non-congregate shelter as the top two priorities.

After consultation with stakeholders, the Allocation Plan retains flexibility for use of some HOME-ARP funds for supportive services for qualified populations, dependent on eligible and competitive applications submitted.

Given other currently available rental assistance sources, Tenant-Based Rental Assistance is not recommended at this time. While some respondents indicated the need for rental assistance, they all recognized the difficulty in finding appropriate rentals for residents with vouchers through existing programs in Montana, such as ESG, Continuum of Care, Housing Choice Vouchers, Montana Emergency Rental Assistance, and Veterans Affairs Supportive Housing.

Public Participation

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:

- ***Date(s) of public notice:*** 1/17/2023
- ***Public comment period:*** start date - 1/17/2023 end date - 2/17/2023
- ***Date(s) of public hearing:*** 1/26/2023

Describe the public participation process:

All public participation efforts were done in accordance with Commerce’s Citizen Participation Plan, which describes the steps that must be taken to ensure comprehensive feedback from stakeholders and community members. In addition to the consultation efforts described above, the State published its HOME-ARP Allocation Plan documents for public review on Commerce’s website at <https://housing.mt.gov/Community-Housing/HOME-ARP> . Citizens or groups that have subscribed to Commerce’s HOME-ARP listserv were notified by e-mail of the document’s availability for comment. The State’s mailing list includes social service organizations, local jurisdictions, low-income housing consumers, neighborhood groups, previous participants and

commentators, businesses, developers, and other interested parties. Commerce placed legal advertisements in the eight major newspapers statewide announcing the availability of the HOME-ARP Allocation Plan, the date of the public hearing, and the dates of the public comment period. Affidavits of publication for the following publications are attached to the HOME-ARP Allocation Plan: the Billings Times, the Bozeman Daily Chronicle, the Great Falls Tribune, the Helena Independent Record, the Missoulian, the Ravalli Republic, the Butte Montana Standard, and the Daily Interlake.

A virtual public hearing was held on January 26, 2023 to inform stakeholders and the public about the HOME-ARP program, the results of State's survey and consultation efforts, and Commerce's plan for the use of funds. Anyone wishing to provide public comment was invited to do so during the public comment period, which ran from January 17 to February 17, 2023.

Describe efforts to broaden public participation:

Notice of the public meeting and comment period was published in multiple newspapers around the state, via press release on Commerce's website, and through email blasts to partners and stakeholders on the State's mailing list. The public comment period was extended from 15 to 30 days.

The public hearing was held virtually to accommodate potential and actual beneficiaries, and those with disabilities around the state. To accommodate non-English speaking persons, alternative formats of the HOME-ARP Allocation Plan were provided upon request.

In addition to the hundreds of hours spent consulting with stakeholders, as outlined in the previous Consultation section of this HOME-ARP Allocation Plan, Commerce staff also provided updates to the EWAC during its public meetings starting in October 2021, with an initial summary of the HOME-ARP requirements, and most recently in September 2022, with draft recommendations for use of HOME-ARP funds in Montana. These public meetings held by the Montana Legislature were additional forums where the public had the opportunity to receive information and updates on the HOME-ARP funding source, as well as provide comments to Commerce staff. Members of the public asked questions and provided input to the plan during these meetings and through the state of Montana's American Rescue Plan Act website: <https://arpa.mt.gov>.

Presentations and updates were provided throughout 2022 at the Montana Housing Coordinating Team meetings, at the Montana Continuum of Care board meetings, at the Human Resource Development Council board meetings, at Interdepartmental Housing Integration Project meetings, and at statewide Housing is Healthcare meetings.

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

Comments received during the public hearing were generally positive and confirmed that the highest priority use of the State's HOME-ARP funds is development of rental units in rural areas. Agencies that provided comment reiterated that the lack of affordable rental units makes it challenging to make use of existing rental assistance programs, and that services needed to keep qualifying populations housed are concentrated in urban areas and entitlement communities. It was suggested that Commerce consider allowing HOME-ARP funds to be used for the acquisition and development of non-congregate shelter, which Commerce has accepted and will accept applications for this activity.

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

Agencies asked about the process to request supportive services funding not associated with any other eligible activity. In order to maximize the production and preservation of housing for qualifying populations with this one-time funding source, supportive services will be an eligible HOME-ARP expense for projects financed with HOME-ARP funds.

Needs Assessment and Gaps Analysis

States must evaluate the size and demographic composition of all four of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. States must identify any gaps within current shelter and housing inventory as well as the service delivery system. States 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.

<i>Table 1: Housing Needs Inventory and Gap Analysis Table</i>			
<i>Non-Homeless</i>	<i>Current Inventory</i>	<i>Level of Need</i>	<i>Gap Analysis</i>
	<i># of Units</i>	<i># of Households</i>	<i># of Households</i>
Total Rental Units	136,685		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	8,400		
Rental Units Affordable to HH at 50% AMI (Other Populations)	7,550		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		18,910	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		7,295	
<i>Current Gaps</i>			26,205

Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Table 2: 2021 Point-in-Time Counts by Shelter Type				
Community	Sheltered – Emergency Shelter	Sheltered – Transitional Housing	Unsheltered	Total Number of Homeless
Great Falls	165	8	31	204
Billings	179	40	228	447
Helena	101	70	55	226
Bozeman	120	32	4	156
Kalispell	68	58	117	243
Missoula	206	45	114	365
Hamilton	6	15	50	71
Butte	55	0	34	89
Total	900	268	633	1,801

Data Source: 2021 Continuum of Care Point-in-Time Count

Table 4: 2021 Point-in-Time Counts by Household Type	
Household Type	Number of Homeless
Adult Individuals	1,270
Family Households	196
Veterans	110
Disabled	299
Total	1,801

Data Source: 2021 Continuum of Care Point-in-Time Count

Table 5: 2015-2019 Comprehensive Housing Affordability Survey Data		
Total Renter Households	137,320	31% of total population
Very Low-Income Renters	56,727	41% of renter households
Cost Burdened VLI Renters	38,007	67% of VLI renter households
Severely Cost Burdened VLI Renters	13,047	23% of VLI renter households
Extremely Low-Income Renters	33,598	24% of renter households
Cost Burdened ELI Renters	27,886	83% of ELI renter households
Severely Cost Burdened ELI Renters	21,502	64% of ELI renter households

Data Source: Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

- 2021 Point-in-Time¹ (PIT) data indicates that there was a total of 1,801 homeless persons in 1,286 households around the state, with half of those (900) in emergency shelters. This is an 11% increase over the 2020 total, which reported 797 individuals and families in emergency shelters. Point-in-Time data also reports a 27% increase in unsheltered individuals and families between 2020 and 2021.

¹ [HUD 2021 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations](#)

- 2022 PIT² data shows a slight decrease in the total number of homeless persons and families in Montana, but an increase in the number of those in emergency shelters. There were a reported 1,585 persons in 1,233 households facing homelessness in the state, with 1,072 of those in emergency shelters.
- Data for 2022 also shows a decrease in the number of individuals and families in transitional housing, which supports the need for more affordable units for qualifying populations around the state. In 2021 there were 268 persons in 184 households residing in transitional housing, but in 2022 that decreased to 220 persons in 137 households.
- The majority of sheltered individuals are reported to be non-Hispanic and over the age of 24. In 2022, there were 784 white individuals, 177 Native Americans, 25 Black/African Americans, four Asian, 13 Native Hawaiian/Pacific Islanders, and 69 individuals reporting multiple races in emergency shelters.
- Of the 1,072 individuals reported in emergency shelters in 2022, 638 are male and 428 are female. Individuals in transitional housing are evenly distributed with 101 male and 117 females.
- PIT data for 2022 also reports that 293 persons in 243 households are unsheltered. This data has been unknown in previous years due to challenges in locating unsheltered populations around the state.
- The accuracy of Montana's data can vary between sources due to the challenges in locating homeless individuals and families. Shelters that participate in the State's Continuum of Care program and Coordinated Entry System are primarily located in metro areas around the state, but anecdotal data through consultation suggests that a significant portion of the homeless population is unreported due to their location in rural areas with limited access to shelters and services.

At Risk of Homelessness as defined in 24 CFR 91.5

- According to the 2019 American Community Survey³ (ACS), Montana has 136,400 renter-occupied housing units. 40% of those households, or 54,844, are in rental units considered to be unaffordable and pay more than 30% of their income in rent.
- 2019 Comprehensive Housing Affordability Strategy (CHAS) data shows that 33,290 renter households are at or below 30% of the Area Median Income (AMI). CHAS data also reports that 60% of all renter households are cost burdened and paying 30% or more of their income in rent. Of those cost burdened renter households, 24,385 have incomes at or below 30% of AMI. This means that 73% of renter households at or below 30% AMI are cost burdened and at increased risk of homelessness.
- CHAS data shows that regardless of income, 57,125 renter households are facing at least one housing problem, with 32,195 of those facing a severe housing problem.

² [HUD 2022 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations](#)

³ [Comprehensive Housing Affordability Strategy "CHAS" Data 2015-2019](#)

This equates to nearly 42% of renter households across the state are cost burdened, face overcrowding, or have inadequate kitchen or plumbing facilities. Of those renter households facing at least one housing problem, more than half (25,200) have incomes at or below 30% AMI.

- Of the renter households facing at least one severe housing problem, 82% are white, 9% are Native American, and the remaining 9% are Black/African American, Asian, or Hispanic.
- The Joint Center for Housing Studies⁴ (JCHS) reports that 11.3% of renters are behind on their rent payments at the time of the survey in 2021.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

- According to the National Coalition Against Domestic Violence (NCADV) Fact Sheet⁵ for Montana, 37.2% of Montana women and 34.6% of Montana men experience intimate partner violence, intimate partner sexual violence and/or intimate partner stalking in their lifetime.
- On September 9, 2021, the National Network to End Domestic Violence⁶ (NNEDV) completed a survey with seven out of 20 programs identified throughout the state. In a single day, 197 victims were served with four unmet requests for services due to lack of resources. The annual survey conducted on September 10, 2020⁷, reported 457 victims served in a single day.
- While it appears that the number of requests for services has decreased from 2020 to 2021, and more of those requests were met, only 35% of domestic violence programs across the state participated in the NNEDV 2021 annual survey. The same survey conducted in 2020 had a 70% participation rate with 14 out of 20 agencies involved. The most recent data on domestic violence in Montana may not be an accurate reflection of the true numbers due to the lack of participation in things such as the NNEDV annual survey.

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

- Individuals returning to their communities after incarceration often have acute needs relating to but not limited to health, employment, and education in order to prevent homelessness. Gaps in services between the needs of this population and the available resources often result in recidivism, re-incarceration, and even death, putting this population at greater risk of housing instability.

⁴ [Joint Center for Housing Studies of Harvard University – The Financial Pressures on Households Vary Considerably by State](#)

⁵ [National Coalition Against Domestic Violence \(2020\). Domestic Violence in Montana](#)

⁶ [National Network to End Domestic Violence 16th Annual Domestic Violence Counts Report - Montana Summary](#)

⁷ [National Network to End Domestic Violence 15th Annual Domestic Violence Counts Report - Montana Summary](#)

- The Montana Emergency Rental Assistance (MERA) program supports Montanans who have experienced financial hardships directly, indirectly, or during the COVID-19 pandemic and are at risk of housing instability. Eligible households can receive assistance for past due and future rent, utility bills, and internet service, as well as late fees, unpaid security deposits, and rental application fees. The MERA program is making policy adjustments to extend this temporary program.
- The MERA program prioritizes assistance for households with incomes less than 50% of Area Median Income (AMI). Of the 13,064 households that have received this benefit to date, 11,508 were households earning less than 30% AMI, 3,767 earned between 30% and 50% AMI, and 2,302 earned between 50% and 80% AMI.
- Of the households assisted through the MERA program, more than 66% were white and 15% were Native American or Alaska Native. Nearly 5% were Asian, Black or African American, Native Hawaiian or Pacific Islander, or Mixed Race. The remaining 13% declined to provide race information.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

- The 2021 Continuum of Care Homeless Assistance Programs Housing Inventory Count⁸ (HIC) reports 1,262 year-round emergency shelter beds in Montana. 609 are family beds, and 653 are adult-only beds. The same inventory count reports a total of 248 seasonal shelter beds. At most, this totals 1,510 emergency shelter beds available for a homeless population estimated to be 1,801 in the same year.
- The homeless population in Montana is estimated to be 1,585 in 2022. While this is less than the PIT count for 2021, the number of households and individuals in emergency shelters still exceeds the number of available beds around the state.
- Between 2021 and 2022, the number of households in emergency shelter increased from 687 to 853. During the same period, the number of households in transitional housing decreased from 184 to 137. While this suggests that Montana faces a shortage of emergency shelter beds, information gathered from homeless shelters and service providers during consultation shows that the lack of affordable rental units plays a large role in the changing number of households experiencing homelessness.
- The number of chronically homeless individuals in Montana jumped from 59 in 2021 to 238 in 2022. There were also a reported 293 unsheltered persons in Montana in 2022, but there is no information on the same population for 2021. This suggests a significant need for supportive services and permanent supportive housing for these individuals.

⁸ [HUD 2021 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report](#)

At Risk of Homelessness as defined in 24 CFR 91.5

- 75% of the responses to Commerce’s survey on the use of HOME-ARP funds identified Tenant-Based Rental Assistance (TBRA) as an area of need around the state. Existing programs that provide rental assistance are short-term and do not provide assistance long enough for individuals and families to get to the top of a voucher waitlist, which can take as much as five years in some parts of Montana. However, 65% of the survey responses selected the development of affordable housing as the number one priority use of HOME-ARP funds because of the extreme lack of rentals available to households assisted with TBRA.
- Of the 4,269 Housing Choice Vouchers (HCVs) available through the State, less than 3,000 are currently in use due to the lack of qualified rentals that meet property standards and accept HCV rent standards. 3,495 households are on waitlists around the state, and 1,170 are under eligibility review. This further supports the need to direct HOME-ARP funds toward development of affordable rental housing to put more vouchers to use, move households off waitlists, and reduce the vulnerability of qualifying populations.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

- The NNEDV fact sheet reports that on a single day in September 2019, programs around the state served 400 adults and children but 21 requests for service went unanswered due to lack of resources. The same fact sheet for 2020 reports that 75% of the unmet requests for services were for housing or emergency shelter.

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

- Multiple agencies noted that those who are justice involved are particularly vulnerable to housing challenges. Consultation provided anecdotal evidence that individuals end up staying in hotels or couch surfing while they wait for assistance with permanent housing, but due to the lack of affordable rentals and willing landlords this intermediary time can be quite long. This puts those individuals at high risk of recidivism and increases their need for supportive services.
- Consultation also identified recovery residences as a need around the state. Current recovery homes serve an average of 75 individuals transitioning out of residential treatment and correctional facilities each year. However, the program has not yet been standardized which creates challenges with funding the agencies that provide on-site services and case management for a very high need population.
- Households earning less than 50% of AMI that were eligible for assistance through the MERA Program no longer have access to this assistance due to diminished funding and the end of the program. To date, there are 3,458 applications that have been submitted

for assistance and are being reviewed. Through consultation, it is clear that there is still a significant need for this assistance even after funding for the program ends.

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

- The lack of affordable housing around the state is the largest gap in the current shelter and housing inventory. A shortage of landlords and property owners who are willing to rent to voucher holders further limits the housing opportunities for qualifying populations. Of the 4,269 Housing Choice Vouchers available through the State, less than 3,000 are currently in use due to the lack of affordable rentals. 3,495 households are on waitlists around the state, and 1,170 are under eligibility review. Multiple agencies that were consulted reported that this makes it extremely difficult for individuals and families attain permanent affordable housing.
- Those experiencing homelessness face a higher risk of substance use, addiction, and behavioral and mental health challenges, and therefore have a higher need for services. The range of service needs covers everything from permanent supportive housing for the highest need individuals and families, to housing navigation and eviction prevention for those at risk of homelessness or facing homelessness for the first time. Existing service providers are concentrated in urban areas, leaving the majority of Montana, a rural state, underserved at every service level.
- The current shelter system provides 1,262 beds across the state, but the total population of individuals and families experiencing homelessness is estimated at 1,801. The level of need varies across homeless subpopulations, but additional shelter beds are required to support the current population.

States may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Commerce does not intend to further define ‘other populations’ beyond what is established in the HOME-ARP Notice.

Identify priority needs for qualifying populations:

Through consultation and public comments, three main needs have been identified as priorities for qualifying populations – non-congregate shelter, supportive services and rental housing units. State funding for supportive services has not kept up with the increasing need, making it difficult for case managers to make referrals. Existing service providers are centralized in larger communities where the need is highest, but that leaves rural communities underserved. Since much of Montana is rural, vulnerable populations must travel to access services which may not be feasible and puts additional strain on existing providers. While the homeless population in

rural areas is unknown due to gaps in the annual Point-in-Time survey, it's clear that the homeless population across the state exceeds the capacity of existing shelters. There are extensive waitlists for Housing Choice Vouchers and transitional housing programs are seeing an increase in the average length of stay. With few landlords willing to accept vouchers and fewer housing options available, the other priority need for qualifying populations is rental housing units. Developing more units that accept vouchers and provide permanent housing for vulnerable populations would relieve the pressure on transitional housing and work to move people from waitlists and into housing opportunities.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

Quantitative data sources include the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS), 2019 and 2020 American Community Survey (ACS), 2021 and 2022 Continuum of Care Homeless Assistance Program. Additionally, Commerce used data from NCADV and NNEDV. Point-in-Time data for both 2021 and 2022 was used since only statewide detail was available for the most recent survey. PIT data for both years is incomplete due to lack of capacity for the Statewide Continuum of Care to conduct a survey of the balance of state. Therefore, Commerce relied heavily on the consultation process to fill in gaps in the quantitative data and better understand the need around the state. All of this information points toward an extreme need for more affordable rental housing inventory around the state, primarily in the underserved rural communities.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Commerce will accept HOME-ARP applications on a competitive basis and prioritize proposals from eligible entities through a ranking process. Applications will be ranked to determine how closely a project aligns with the HOME-ARP program goals and objectives, and Commerce's criteria. HOME-ARP Program requirements, grant application and guidelines, and other relevant information and resources are available on the Commerce website at <https://housing.mt.gov/Community-Housing/HOME-ARP>.

Describe whether the PJ will administer eligible activities directly:

The State of Montana will not administer eligible activities directly. Instead, Commerce will oversee the administration of HOME-ARP funds and accept applications for eligible projects on a competitive basis.

If any portion of HOME-ARP administrative funds are 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 HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the HOME-ARP program:

Not applicable.

Use of HOME-ARP Funding	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,300,000		
Acquisition and Development of Non-Congregate Shelters	\$ 2,000,000		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 7,013,792		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 1,145,976	10 %	15%
Total HOME ARP Allocation	\$ 11,459,768		

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

The above funding amounts are estimates based on feedback during consultation and may be adjusted depending on the number and types of applications received. The majority of funding will be allocated to development of new rental housing units as the highest priority need in the State, followed by development of non-congregate shelter and supportive services.

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 majority of the existing shelter and housing inventory is in the larger urban communities around the state, leaving rural areas underserved. The same can be said of the service delivery system, where agencies that provide necessary services to qualifying populations are in urban areas making it difficult to access for those in rural areas. While there is still a need in these urban areas, most are entitlement communities and receive a direct allocation of funds from HUD to provide housing and services in their jurisdiction. Therefore, Commerce intends to open the competitive HOME-ARP application process to non-entitlement communities first, and if all funds are not distributed to eligible projects a second competitive application process will be opened to all communities regardless of entitlement status.
- All agencies consulted with identified additional affordable housing units as a high need, which if combined with existing rental assistance programs, may help alleviate the

housing needs for qualifying populations. Tenant based rental assistance is a lower priority because of low utilization rate of existing HCV and Continuum of Care voucher programs.

- The consultation agencies agreed that homes for qualifying populations in either non-congregate shelter or permanent supportive housing require supportive services. The existing shelter space across the state is inadequate for the number of people experiencing homelessness, indicating a need for more shelter beds. However, these agencies also noted that if there were more affordable rental units available, people could transition out of shelter faster which would increase the efficiency of the current shelter system. Commerce intends to accept applications for eligible non-congregate shelter projects to address this need.

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:

The State of Montana estimates that 35 rental units will be produced with HOME-ARP funds. This is based on an estimated average \$200,000 per unit development cost. While there is no per unit subsidy limit under HOME-ARP, this estimate aligns with HUD's HOME Program per unit subsidy limits for efficiency, one- and two-bedroom units. However, Commerce expects these funds will be leveraged with other private and public funds to develop additional homes for qualifying populations.

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

Commerce anticipates that 25 new units of rental housing will be constructed, and as many as 10 units will be rehabilitated. This will increase the number of housing options available to qualifying populations, which is the highest priority need identified in Montana. While eligible projects may be financed solely through HOME-ARP, it is expected that projects will leverage other funding sources to further increase the affordable housing stock around the state.

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 *method of prioritization* is the process by which a state determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. States must describe the planned use of any preferences in its HOME-ARP allocation plan.

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:

Montana does not intend to give preference to any qualifying population or subpopulation. However, Commerce recognizes that individual applicants may implement preferences for projects that utilize HOME-ARP funds. To ensure a preference is not present in funding decisions and all qualifying populations are able to benefit from HOME-ARP funds, scoring criteria has been developed which awards the most points to projects that serve all qualifying populations. If projects with preferences are submitted, prior to recommending those projects for funding, Commerce will determine if a substantial amendment is required.

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 subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable as the State of Montana does not intend to use any preferences. While projects with preferences may be funded, Commerce will determine if a substantial amendment to the HOME-ARP Allocation Plan is required before making recommendations for funding.

Referral Methods

A state is not required to describe referral methods in the plan. However, if a state intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the state must ensure compliance with HUD requirements.

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

Commerce will oversee the administration of HOME-ARP funds and accept applications on a competitive basis for eligible projects. Applicants for HOME-ARP funding will utilize different referral methods for their programs as appropriate.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

The State of Montana does not intend to use CE as the State will not administer any program activities directly. Eligible projects that are awarded HOME-ARP funds may use coordinated entry processes established by local Continuums of Care that are specific to the applicant's jurisdiction and consistent with the HOME-ARP requirements. This process must be described in the application for funding to ensure compliance.

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The State of Montana will not further restrict the use of HOME-ARP funds by limiting eligibility for a rental housing or NCS project to a particular qualifying population over any others. Commerce anticipates that some applicants for HOME-ARP funds may implement a limitation for individual projects based on the specialized services offered, such as development of a non-congregate shelter for individuals and families fleeing or attempting to flee domestic violence, dating violence, sexual assault, and human trafficking as defined by HUD. These services and any associated limitations must be described in the application for HOME-ARP funds and must be consistent with the program requirements. Prior to recommending projects with limitations, Commerce will determine whether a substantial amendment to the HOME-ARP Allocation Plan is required.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable as the State does not intend to implement any limitations.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not applicable as the State does not intend to implement any limitations.

HOME-ARP Refinancing Guidelines

The State of Montana will not allow HOME-ARP funds to be used to refinance existing debt. Through consultation, the highest and best use of funds is development and construction of affordable rental units and non-congregate shelter.

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.***

Not applicable as Montana's HOME-ARP funds will not be used to refinance existing debt.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

Not applicable as Montana's HOME-ARP funds will not be used to refinance existing debt.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

Not applicable as Montana's HOME-ARP funds will not be used to refinance existing debt.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

Not applicable as Montana's HOME-ARP funds will not be used to refinance existing debt.

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

Not applicable as Montana's HOME-ARP funds will not be used to refinance existing debt.

- ***Other requirements in the PJ's guidelines, if applicable:***

Not applicable.

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:**

09/20/2021

4. Applicant Identifier:

5a. Federal Entity Identifier:

HUD

5b. Federal Award Identifier:

M21SP300100

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** State of Montana

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

81-0302402

*** c. UEI:**

QF1EAYPHGCD6

d. Address:

* Street1: 301 South Park Avenue

Street2: Montana Department of Commerce - PO Box 200523

* City: Helena

County/Parish: Lewis and Clark County

* State: MT: Montana

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 59620-0523

e. Organizational Unit:

Department Name:

Montana Department of Commerce

Division Name:

Montana Housing

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

Prefix:

Ms.

*** First Name:**

Cheryl

Middle Name:

*** Last Name:**

Cohen

Suffix:

Title: Division Administrator

Organizational Affiliation:

Department of Commerce, Montana Housing

* Telephone Number: 406-841-2840

Fax Number: 406-841-2841

* Email: cheryl.cohen@mt.gov

Application for Federal Assistance SF-424

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

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:

HOME Investment Partnerships Program - American Rescue Plan

* 12. Funding Opportunity Number:

* Title:

HUD Montana Non-Entitlement for Home Investment Partnerships Program - American Rescue Plan

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:

State of Montana HOME Investment Partnerships Program - American Rescue 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 * b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="11,459,768.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="11,459,768.00"/>

*** 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 218, 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:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

4.5.23

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).
9. 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.
10. Will comply with all Federal statutes relating to non-discrimination. 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.

11. 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 and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the 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.
13. 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.
14. Will comply 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.
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).
16. 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.
17. 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).
18. 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."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. 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 <input type="text" value="Director"/>
APPLICANT ORGANIZATION <input type="text" value="Montana Department of Commerce"/>	DATE SUBMITTED <input type="text" value="02/28/2023"/>

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 <input type="text" value="Director"/>
APPLICANT ORGANIZATION <input type="text" value="State of Montana Department of Commerce"/>	DATE SUBMITTED <input type="text" value="02/28/2023"/>

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.

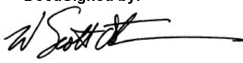
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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.

DocuSigned by:

623463E3E1AC453...

Signature of Authorized Official

3/2/2023

Date

Director, Montana Department of Commerce
Title

Appendix A: Public Engagement Record

The State of Montana solicited public comment by announcing a public comment period and holding a public hearing for the HOME-ARP Allocation Plan. Every comment received in writing and provided verbally at the hearing was considered. All comments received and the State's responses are outlined below. An official transcript of the public hearing as well as documentation showing outreach completed (affidavits of publication for print advertisements and proof of electronic announcement) are also attached.

Comments Received and Responses Thereto

Jim Morton, Executive Director, District XI Human Resources Council

Comment #1:

Overall, I want to compliment the staff on the document and especially comment on the recognition in the document of non-entitlement communities. And I'll have questions I'll submit in writing. My further comment would be that once the plan is approved, that I would stress the need for the staff to hold a working session with potential applicants so that we can have a time to answer -- to ask questions and have them answered. Thank you.

Response to Comment #1:

Thank you for your comments during the public meeting. When the HOME-ARP Application Guidelines are complete and a deadline for applications is established, Commerce will hold a workshop to assist eligible entities with the development of their applications and answer any remaining questions about the program.

Heather Grenier, Chief Executive Officer, Human Resources Council District IX

Comment #2:

I'm speaking to the HOME-ARP Plan and I would just encourage consideration for allocating dollars to development of non-congregate shelter. That was one of the initial HOME-ARP priorities identified as a high-priority-need area, but not allocated any funding. I think there are solutions on the ground that people deployed as COVID response in anticipation of those dollars across the State, and it feels like that's a slight diversion from the initial plan. But I also want to thank the staff for all their work on this and appreciate the opportunity today. Thank you.

Response to Comment #2:

Acquisition and development of non-congregate shelter is an eligible activity under the HOME-ARP program and Commerce will accept applications for projects to develop non-congregate shelter. We understand that by not specifying a funding amount for this activity in the draft Allocation Plan, it appeared that Commerce would not allow HOME-ARP funds for this activity. The Allocation Plan has been adjusted to clarify that applications for non-congregate shelters will be accepted and ranked according to the criteria in Commerce's application guidelines.

Ruth Burke, Executive Director, District XI Human Resources Council

Comment #3:

26 January 2023

Montana Dept of Commerce
Community MT Division
Attn: Con Plan
301 S. Park Avenue
P.O. Box 200523
Helena, MT 59620-0523
DOCConPlan@mt.gov

RE: HOME-ARP Allocation Plan

Dear MDOC:

Thank you for this opportunity to comment on the HOME-ARP Allocation Plan (Plan). The Plan is well written and a thorough consideration of housing issues facing our most vulnerable community members in Montana. Our comments are as follows:

I. Support.

District XI HRC supports the following elements in the Plan:

1. **Focus on Rural Development.**
The focus on rural development is an essential component of the Plan. The rural areas (non-entitlement communities) face grievous shortages of affordable housing. Homelessness is widespread but often hidden; the lack of urban style emergency shelters does not readily illustrate the need. We support the opportunity for rural areas that do not separately receive HOME-ARP funds to access these funds without pressure from the entitlement cities.
2. **Focus on Those Most Vulnerable.**
We support the Plan's focus on those most in need- the houseless and those at-risk of houselessness. The Plan well illustrates the shortage of affordable housing for those who qualify for rental assistance, which are typically the same populations identified the Plan. The construction of new housing will aid in this dilemma.

Incapacity
Assessment
Services

Low Income
Advocacy

Workforce
Development

Energy
Assistance

Owner
Occupied
Home
Rehabilitation
Loan Program

Affordable
Housing
Development

First Time
Homebuyer
Assistance

2-1-1
Information
& Referral

Residential
Energy
Conservation

Rental
Assistance

Summer
Food
Service

A LEADER IN COMMUNITY ACTION SINCE 1965

1801 South Higgins Avenue, Missoula, Montana 59801 (406) 728-3710 FAX (406) 728-7680

Offices in Missoula, Mineral and Ravalli Counties  Equal Opportunity in Service and Employment



II. Suggestions.

District XI HRC suggests the following priorities for scoring the application, providing additional points for:

1. Creation of New Units.
The creation of new units is essential, whether through new construction, adaptive re-use of a currently non-housing structure, or repair to those units that do not meet HQS standards. New unit proposals should receive a higher score.
2. Readiness to Proceed.
These funds need to hit the ground and create new units ASAP. Shovel ready projects, i.e. land in hand, zoning and environmental review complete, plans ready for permitting, should receive a higher score.

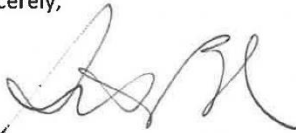
III. Questions.

HRDCXI seeks guidance on the following:

1. What is the per unit subsidy?
 - a. Specifically, for new construction, does this include land cost, infrastructure costs and/or professional fees if also paid for with HOME-ARP funds?
2. Are furnishings an eligible expense for permanent housing for the homeless?
3. Can supportive services be requested in the same application as one for construction?

Thank you for your consideration. We look forward to working with you.

Sincerely,



Ruth Burke
Executive Director

Incapacity
Assessment
Services

Low Income
Advocacy

Employment
& Training

Job Skills
Development

Energy
Assistance

Owner
Occupied
Home
Rehabilitation
Loan Program

Affordable
Housing
Development

First Time
Homebuyer
Assistance

2-1-1
Information
& Referral

Energy
Conservation

Rental
Assistance

Summer
Food
Service



Response to Comment #3:

The application guidelines for the HOME-ARP program will award points based on readiness to proceed. While rehabilitation of existing units is an eligible use of HOME-ARP funds and an eligible activity in the State's Allocation Plan, creation of new units is a priority that is reflected in Commerce's ranking criteria.

Responses to the questions posed are as follows:

1. What is the per unit subsidy?
 - a. Specifically, for new construction, does this include land cost, infrastructure costs and/or professional fees if also paid for with HOME-ARP funds?
 - There is no per unit subsidy limit for the HOME-ARP program. In the comment made during the public hearing, Ms. Burke referenced a \$200,000 per unit development cost. This was not a subsidy limit, but was the baseline used to estimate and present a production goal that HUD required.
2. Are furnishings an eligible expense for permanent housing for the homeless?
 - Furnishings not associated with the development of new or rehabilitation of existing housing units are not an eligible expense through the HOME-ARP program.
3. Can supportive services be requested in the same application as one for construction?
 - Yes. Funding for supportive services can be included in an application to develop or rehabilitate affordable housing units. Applications for supportive services not associated with the development or rehabilitation of affordable housing units will not be accepted. The HOME-ARP Allocation Plan and Application Guidelines have been updated accordingly.

Shyla Patera, Independent Living Specialist, North Central Independent Living Services, Inc.

Comment #4:

February 17, 2023

My name is Shyla Patera. I am an Independent Living Specialist employed by and representing North Central Independent Living Services, Inc. in Black Eagle, Montana. I wish to comment on both the Annual Action Plan and ARPA request for both Montana Housing and CDBG activities. North Central Independent Living Services, Inc. advocates not only for accessible affordable universal designed housing stock but also policies that would allow [persons] with disabilities and those State of Montana residents who need or are eligible for income supports throughout our state to access and afford housing. The State of Montana must encourage our development community to invest in accessible, affordable home building and rental stock. MBOH, Montana Housing, as well as community developers must ensure that accessibility and universal designed features are available in many individual units and community development projects.

MBOH must ensure that all development used for housing and appropriate rental properties must incorporate universal design to the highest degree. NCILS supports both the codification of language and allocation of funding which would hopefully allow the State of Montana to advance the incorporation of Visitable universally designed housing stock in Montana. We, at NCILS know that tiny dwelling unit construction will play a vital part in advancing Montana's construction and design portfolio.

Regarding affirmative fair housing policies, MBOH and Montana Housing officials should encourage use of all housing tools in our toolbox available to us as a community. We need to maximize use of Section 8 vouchers, McKinney Vento Funding, HUD VASH vouchers, Mainstream 811 vouchers and more. I thank

Montana Housing for partnering with DPHHS to implement the Housing Stability fund. We must as a state serve all with various disabilities and make sure if there is a medical emergency where someone needs to be hospitalized in a medical setting that they can return to a housing option that offers accessible features and potential services if needed, wanted, and requested by citizens with disabilities.

The State of Montana may benefit from bringing back or assisting communities in utilizing and implementing small community ADA housing development grants that were once housed and I believe, still are, in the Community Development Division. Montana should encourage emergency shelters to maximize disability accessibility of all types.

Montana Housing should be working with DPHHS as well as local continuum of care to ensure that Montana homeless communities do not discharge to nowhere if medical emergencies occur. Our State should be a leader in implementing tenant supports. The State of Montana should be partnering with HUD to both reduce rental barriers and enhance community living supports in both rental and homeownership supports.

Montana Housing should be encouraging HUD to study and implement policies regarding fair housing and disparate impacts based upon Source of Income policies particularly if someone lives on a fixed income and that person finds a need to appeal an HUD bill or a landlord action in a unit. Just as we prorate for income eligibility in HUD programs based on medical expenses as well as family and custodial needs, should to also prorate HUD fines and adjust appeal time frames and opportunities to better match the Montana Human Rights Act.

The State of Montana and its partners must include broadband and affordable internet in any community development opportunities.

On CDBG funding, the State of Montana and the Community Development division should be encouraging all Montana communities to adopt, implement, and enforce ADA transition plans for accessible sidewalks, alleys, and pathways. The Community Development Division should assist homeowners, community members, and businesses where sidewalks are in need of repair to help develop and enforce policies which both encourage and promote accessibility in our neighborhoods rather than just leaving it up to the individual property owner or a business to ensure maximum disability accessibility in our sidewalk repair. I also advocates for accessible transportation options and policies throughout both local and state wide community development opportunities through the potential use of discretionary grants and other opportunities. The states of Montana, as well as our business, military, employment, and our nonprofit sectors, need to explore innovative ways to grow our accessible transportation and housing infrastructure networks.

Thank you for the opportunity to submit comments on Montana's Annual Action Plan and Home ARPA comment period.

Shyla Patera IL Specialist
North Central Independent Living Services, Inc.
1120 25th Avenue Northeast
Black Eagle, Montana 59414
406-452-9834
spatera@ncils.org

Response to Comment #4:

Thank you for your feedback on the HOME-ARP Allocation Plan. As with all HUD-funded programs, five percent of all units constructed or rehabilitated with HOME-ARP funds are required to meet accessibility and visitability requirements. In addition, newly constructed projects must meet visitability requirements. The nature of the HOME-ARP program specifically targets qualifying populations, including those with disabilities. By focusing use of funds to develop affordable rental homes, the State aims to increase utilization of existing federal rental assistance programs. Federal rental assistance programs administered by Commerce are currently underutilized due to the lack of available rental units at or below HUD-required Voucher Payment Standards that meet Housing Quality Standards, and the willingness of landlords to participate in these programs. While we recognize the needs across the State exceed currently available resources, projects completed with the assistance of HOME-ARP funds will increase the housing opportunities available to qualifying populations.

Comments continue on next page.

Carrie Krepps, Executive Director, Florence Crittenton Family Services

Comment #5:



Montana Department of Commerce - Montana Housing
Attention: HOME-ARP Allocation Plan
P.O. Box 200523
Helena, MT 59620-0523

To Whom It May Concern,

On behalf of the Board of Directors and clients served by Florence Crittenton I write today to supply comment to the HOME-ARP Allocation Plan put forth by the Montana Department of Commerce. I first would like to extend our gratitude to the DOC staff for their diligence in working through this process to make the very best decisions for this once-in-a-lifetime funding for our state to address the housing crisis.

We are in support of the Department's allocation towards affordable rental housing. We do feel that there was very little survey/interviewing of youth client-based organizations in the process so would like to comment on that particular sub-population. To that end we would like to supply information regarding the need for flexible and affordable housing options for youth.

While on the surface it can seem that we do not have a homeless challenge with youth, as we do not as often see them on the streets in Montana. However, it is a massive problem that is only continuing to get worse with the rise in substance use and the mental health challenges that were escalated during the pandemic. When we talk about affordable rental housing, we do not often think of youth as they are typically under the age of 18 and often are not able to be housed on their own. These youth very much should still be considered when discussing affordable rental housing with the understanding that the housing avenues for this population may look different than traditional affordable rental housing systems and structures. Youth, particularly homeless youth and those transitioning out of the foster care system, are at particular risk and most often benefit from living in some type of group setting where they can receive care and supervision from adults, and can rely on their peers to for building a support system and family network. These youth also need the time to gain and maintain employment so they can begin saving for rent.

We must recognize that while these housing structures for youth are going to look different than those traditional units we think of when we think affordable rent housing, they are critical to the wellbeing of our youth and therefore the wellbeing of our communities. Our youth are the foundation of our communities and without significant support for this population we risk continued and increasing homeless populations into the next generation. We must think of our youth housing as our prevention plan while we address the current housing crisis.

Thank you again for your thorough and thoughtful assessment of the current housing market in Montana and the use of these transformational funds. We are so grateful for the staff at DOC and their dedication to this very important topic in our state.

Sincerely,



Carrie Krepps, Executive Director
carriek@florencecrittenton.org

Response to Comment #5:

Thank you for your response to the HOME-ARP Allocation Plan, specifically regarding youth facing homelessness in Montana. We recognize that youth experiencing homelessness in Montana face unique challenges, and that data regarding this population paints an incomplete picture. The definitions of each qualifying population include the requirements for an unaccompanied youth under the age of 25 to qualify for a HOME-ARP eligible project. Any youth that meets the definitions of one or more qualifying populations is eligible for a HOME-ARP assisted project. Commerce will accept applications for eligible projects that target homeless youth provided the youth meet the definition of one or more qualifying populations and the project is in compliance with all other HOME-ARP program requirements.

Tam Rodier, Community Development Program Coordinator, City of Billings

Comment #6:

I read MDOC's draft HOME-ARP allocation plan and wish to comment on the following:

- Pages 7-8 show 202¹ PIT data, but then on pages 8-9 in the summary section they reference 202² PIT data. Confusing.
- Page 9, 2nd to the last bullet, last sentence says, "...and the remaining 9% are Black/African American, Asian, or Hispanic." "Hispanic" should not be included in this list as it is an ethnicity, not a race. An individual can be any race AND Hispanic.
- Page 14, 1st paragraph says, "...Applications will be ranked to determine how closely a project aligns with the HOME-ARP program goals and objectives and Commerce's criteria." I don't see program goals and objectives. Or, at least I hadn't read them by the time I got to this page. Perhaps this should be revised to say, "...which may be found on page 15."
- The <https://housing.mt.gov/Community-Housing/HOME-ARP> link does not yet bring up the application. Perhaps they should say, "which will go live on DATE," or "applications will be opened after HUD approval of the HOME-ARP Allocation Plan," or other text that makes it clear when applications will be accepted.
- Page 15, 1st bullet, says, "...most are entitlement communities and receive a direct allocation of funds from HUD to provide housing and services in their jurisdiction." Page 1 states there are only three entitlement communities in Montana (Billings, Great Falls and Missoula). Perhaps this could be reworded to more directly state that applications from within those specific entitlement communities will not be accepted during the first round of applications.
- Page 16, Preferences. Without preferences, will MDOC and their subrecipients be required to provide services in chronological order regardless of the situation? In any case, I am surprised no preferences are listed. For example, an individual higher on a housing waiting list would be served before a family of four. Or, a disabled veteran might be served after an individual simply because the individual applied first. Or, if a grantee only serves those fleeing from domestic violence, and there is another person on the CoC waiting list that is not fleeing, the non-fleeing person would get served first. I'm not sure this makes sense.

Sincerely,
Tam Rodier

Response to Comment #6:

Thank you for your feedback on Commerce's draft HOME-ARP Allocation Plan. Please see our responses below:

- The level of detail in PIT data varied considerably between 2021 and 2022. Commerce will adjust the tables to provide the most recent data available.
- Commerce has copied the demographic breakdown provided by the Comprehensive Housing Affordability Strategy (CHAS) in order to accurately reflect the source data.
- The HOME-ARP program goals and objectives can be found in the CPD Notice issued by HUD. Commerce's HOME-ARP application, which includes ranking criteria, is not available for public review at this time.
- Commerce's HOME-ARP application is not available for public review at this time. We will clarify this timeline.
- The first bullet on page 15 is referring specifically to existing emergency shelters, which are primarily found in urban areas that are also entitlement communities. We will clarify who is eligible to apply for HOME-ARP funds.
- The State is not implementing any preferences or limitations in order to allow individual projects to serve qualifying populations as needed in their local area. The State is also not specifying any referral methods beyond what is required by the HOME-ARP program to allow flexibility at the local level. Individual projects may choose preferences and referral methods based on what will best meet the needs of qualifying populations in their jurisdiction. These must meet the requirements of the program and be described in the application for HOME-ARP funds. Commerce realizes there are varying needs across the State and is providing flexibility within the program requirements for individual communities to address the needs specific to their jurisdiction.

Brenda Beckett, Community Services Manager, City of Billings

Comment #7:

PS – I still cannot find the HOME-ARP drafted allocation plan on the website. Can you send me a PDF?

Also, you might want to check the qualifying populations definitions [posted on your website](#), as they are identified in the **McKinney-Vento Homeless Assistance Act**, rather than definitions provided by HUD via Consolidated Planning in 24 CFR 91.5.

[HOME-ARP Overview - HUD Exchange \[hudexchange.info\]](#)

HOME-ARP funds must be used to primarily benefit individuals or families from the following qualifying populations:

- *Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#) [[usc.house.gov](#)]);*
- *At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11360\(1\)](#) [[usc.house.gov](#)]);*
- *Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;*

- *In other populations where providing supportive services or assistance under section 212(a) of the Act ([42 U.S.C. 12742\(a\) \[uscode.house.gov\]](#)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;*
- *Veterans and families that include a veteran family member that meet one of the preceding criteria.*

Response to Comment #7:

Due to technical difficulties, this comment was received prior to the draft HOME-ARP Allocation Plan being uploaded to Commerce's website. The definitions were corrected, and a copy of the Plan was sent to Ms. Beckett.

Patti Webster, Executive Director, HAB Development

Comment #8:

Form Name:	ARPA Public Comment
Submission Time:	March 11, 2022 1:23 pm
Browser:	Chrome 99.0.4844.51 / Windows
IP Address:	174.45.213.42
Unique ID:	940126107
Location:	

Name	Patti Webster
Email	pattiw@homefrontpartners.org
Phone	(406) 861-2764
Organization	HomeFront
Program	Housing and Rental Assistance
Subject	HOME AARP Funds Distribution
Comment	<p>Greetings,</p> <p>I respectfully ask the committee to consider priority funding, to all locations in Montana, that purchased buildings for non-congregate sheltering as a direct response to the emergency pandemic.</p> <p>Communities and agencies that gave selflessly should be prioritized in being made whole before new projects are funded.</p> <p>For example, HAB Development purchased a hotel in Billings to provide non-congregate shelter and to act as the community's Quarantine & Isolation site. The agency put up \$1,600,000.00 to ensure that those being asked to leave shelters and those who needed a place to quarantine and isolate were provided for during this time. The Yellowstone County Continuum of Care energized all efforts for the operation of the shelter and ESG funds from CARES act paid for operations, but this is the only pot of funding available to agencies to recover the costs of the acquisition.</p> <p>From 10/16/2020 - December 31, 2021 over 150 unique individuals were provided 917 nights of shelter for the Quarantine and isolation site. In this same time period, over 400 unique individuals were provided shelter on the Low Barrier Shelter side of the hotel for over 16,000 shelter nights. None of the unique individuals are duplicated.</p> <p>Your careful consideration to make agencies and programs whole before providing funding to new projects is greatly appreciated.</p>

Response to Comment #8:

Development of non-congregate shelter is an eligible activity in Commerce's HOME-ARP Allocation Plan. The Plan does not prioritize one eligible activity over others.

Appendix B: Affidavits of Publication

IN THE MATTER OF NOTICE

The Montana Department of Commerce Announces the Public Comment Period for the HOME-ARP Allocation Plan and Substantial Amendments to the 2020 and 2021 Annual Action Plans (AAP).

The following documents are available for public comment from January 17, 2023, to February 17, 2023.

- The HOME-ARP Allocation Plan summarizes the actions, activities, and resources available for the State of Montana's HOME-ARP program. The US Department of Housing and Urban Development allocated \$11 million to Commerce to address housing needs for Qualifying Populations through the production of permanent homes, non-congregate shelter and/or supportive services.

- The substantial amendment to the 2020-2024 Consolidated Plan Year 1 AAP to redistribute Community Development Block Grant (CDBG) funds from economic development activities to public and community facilities; and

- The substantial amendment to the 2021-2022 AAP to redistribute CDBG funds from economic development activities to public and community facilities.

All documents are available electronically at <https://housing.mt.gov/Community-Housing/HOME-ARP>, <https://commerce.mt.gov/Consolidated-Plan/Documents>, and as a hardcopy by request. All comments must be submitted to the address or email below no later than 5:00 p.m. on February 17, 2023.

Montana Department of Commerce
Community MT Division
Attention: Con Plan
301 S. Park Avenue
P.O. Box 200523
Helena, MT 59620-0523
DOCConPlan@mt.gov

The public hearing will be held on Zoom and presentation materials will be available on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents> prior to the public hearing. The State of Montana will consider any comments or views provided in writing during the specified comment periods or orally during the public hearing. To participate in the public hearing, please follow the information on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents>.

The Department of Commerce will make reasonable accommodations for persons with disabilities or persons with limited English proficiency who wish to participate in this process and need an alternative accessible format of the presentation materials or translation materials. If you require an accommodation, please contact the Department of Commerce at DOCConPlan@mt.gov no later than 5:00 p.m. on January 20, 2023.

El Departamento de Comercio hará adaptaciones razonables para las personas con discapacidades o personas con dominio limitado del inglés que deseen participar en este proceso y necesiten un formato accesible alternativo de materiales de presentación o servicios de traducción. Si necesita una adaptación, comuníquese con El Departamento de Comercio en DOCConPlan@mt.gov antes de las 5:00 p.m. del 20 de enero de 2023.

Have questions?
Email DOCConPlan@mt.gov
(January 19, 2023)



AFFIDAVIT of PUBLICATION

STATE OF MONTANA)
) SS
County of Yellowstone)

Scott R. Turner, being first duly sworn, deposes and says that the:

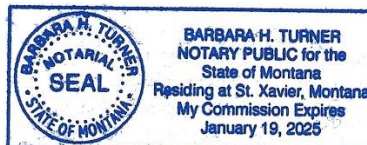
Notice - Public Comment Period for HOME-ARP Allocation Plan and Amendments to 2020 and 2021 Annual Action Plans

a copy of which is hereto attached, was published in the regular and entire issue of The Billings Times, a weekly newspaper of general circulation published every Thursday in the City of Billings, County of Yellowstone, State of Montana, for 1 issue, the 19th day of January, 2023.

STATE OF MONTANA)
) SS
County of Yellowstone)

On this 19th day of January, 2023, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Scott R. Turner, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same and after being first duly sworn, deposed and stated that the matters and things contained therein are true of his own knowledge.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal the day and year in this certificate first above written.



**AFFIDAVIT OF PUBLICATION
STATE OF MONTANA,
COUNTY OF GALLATIN**

I, Ann Harms, Legal Specialist being first duly sworn, depose and say that I am the principal clerk of the publisher of the Bozeman Daily Chronicle a newspaper in general circulation, Bozeman, Gallatin County, Montana; that I know from my personal knowledge that the Legal # 106615 The Montana Department of Commerce A printed copy of which is hereto annexed, was published in the entire issue of said newspaper for: 1

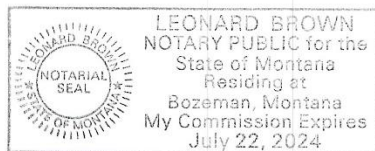
Insertion(s) in the following issues: 01/17/23

Total Cost: \$44.00

Ann Harms
Subscribed and sworn by Ann Harms before me on:
On 19th day of January, in the year of 2023

Leonard Brown

Notary Public for the State of Montana Residing at
Bozeman, Montana



AD# 323166

The Montana Department of Commerce Announces the Public Comment Period for the HOME-ARP Allocation Plan and Substantial Amendments to the 2020 and 2021 Annual Action Plans (AAP).

The following documents are available for public comment from January 17, 2023, to February 17, 2023.

- The HOME-ARP Allocation Plan summarizes the actions, activities, and resources available for the State of Montana's HOME-ARP program. The US Department of Housing and Urban Development allocated \$11 million to Commerce to address housing needs for Qualifying Populations through the production of permanent homes, non-congregate shelter and/or supportive services.

- The substantial amendment to the 2020-2024 Consolidated Plan Year 1 AAP to redistribute Community Development Block Grant (CDBG) funds from economic development activities to public and community facilities; and

- The substantial amendment to the 2021-2022 AAP to redistribute CDBG funds from economic development activities to public and community facilities.

All documents are available electronically at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents>, and as a hardcopy by request. All comments must be submitted to the address or email below no later than 5:00 p.m. on February 17, 2023.

Montana Department of
Commerce
Community MT Division
Attention: Con Plan
301 S. Park Avenue
P.O. Box 200523
Helena, MT 59620-0523
DOCConPlan@mt.gov

The public hearing will be held on Zoom and presentation materials will be available on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents> prior to the public hearing. The State of Montana will consider any comments or views provided in writing during the specified comment periods or orally during the public hearing. To participate in the public hearing, please follow the information on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents>.

The Department of Commerce will make reasonable accommodations for persons with disabilities or persons with limited English proficiency who wish to participate in this process and need an alternative accessible format of the presentation materials or translation materials. If you require an accommodation, please contact the Department of Commerce at DOCConPlan@mt.gov no later than 5:00 p.m. on January 20, 2023.

El Departamento de Comercio hará adaptaciones razonables para las personas con discapacidades o personas con dominio limitado del inglés que deseen participar en este proceso y necesitan un formato accesible alternativo de materiales de presentación o servicios de traducción. Si necesita una adaptación, comuníquese con El Departamento de Comercio en DOCConPlan@mt.gov antes de las 5:00 p.m. del 20 de enero de 2023.

Have questions?
Email DOCConPlan@mt.gov
MNA:LP

**GREAT FALLS
TRIBUNE**
PART OF THE USA TODAY NETWORK

**AFFIDAVIT OF PUBLICATION
THE GREAT FALLS TRIBUNE
205 RIVER DR S
GREAT FALLS, MT 59405
Phone: (406) 791-1444
Toll Free (800) 438-6600**

**MT NEWSPAPER ASSOCIATION
825 GREAT NORTHERN BLVD STE
HELENA, MT 59601**

FAL-6COL Legal

REFERENCE: FAL-002958 **CASE NO:**
0005558759

I, being first duly sworn deposes and says that GREAT FALLS TRIBUNE COMPANY is a corporation duly incorporated under the laws of the State of Delaware, that the said GREAT FALLS TRIBUNE COMPANY is the printer and publisher of the GREAT FALLS TRIBUNE, a daily newspaper of general circulation of the County of Cascade, State of Montana, and that the deponent is the principal clerk of said GREAT FALLS TRIBUNE COMPANY, printer of the GREAT FALLS TRIBUNE, and that the advertisement here to annexed...

**The Montana Department of Commerce Announces the Public Comment
Period for the HOME-ARP Allocation Plan and Substantial**

Has been correctly published 1 times in the regular and entire issue of said paper on the following issues dated:

01/17/2023

D. Roberts

LEGAL CLERK

1-17-2023

DATE

known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he/she executed the same.

In witness whereof, I have hereunto set my hand and affixed my Notarial Seal of the day and year first above written.

Kathleen Allen

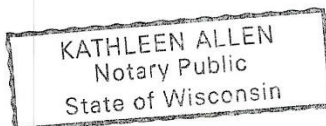
State of Wisconsin, County of Brown Notary Public

1-7-25

Notary Expires

of Affidavits: 1

This is not an invoice





The Montana Department of Commerce Announces the Public Comment Period for the HOME-ARP Allocation Plan and Substantial Amendments to the 2020 and 2021 Annual Action Plans (AAP).

The following documents are available for public comment from January 17, 2023, to February 17, 2023.

- The HOME-ARP Allocation Plan summarizes the actions, activities, and resources available for the State of Montana's HOME-ARP program. The US Department of Housing and Urban Development allocated \$11 million to Commerce to address housing needs for Qualifying Populations through the production of permanent homes, non-congregate shelter and/or supportive services.

- The substantial amendment to the 2020-2024 Consolidated Plan Year 1 AAP to redistribute Community Development Block Grant (CDBG) funds from economic development activities to public and community facilities; and

- The substantial amendment to the 2021-2022 AAP to redistribute CDBG funds from economic development activities to public and community facilities.

All documents are available electronically at <https://housing.mt.gov/Community-Housing/HOME-ARP>, <https://commerce.mt.gov/Consolidated-Plan/Documents>, and as a hardcopy by request. All comments must be submitted to the address or email below no later than 5:00 p.m. on February 17, 2023.

Montana Department of Commerce

Community MT Division

Attention: Con Plan

301 S. Park Avenue

P.O. Box 200523

Helena, MT 59620-0523

DOCConPlan@mt.gov

The public hearing will be held on Zoom and presentation materials will be available on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents> prior to the public hearing. The State of Montana will consider any comments or views provided in writing during the specified comment periods or orally during the public hearing. To participate in the public hearing, please follow the information on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents>.

The Department of Commerce will make reasonable accommodations for persons with disabilities or persons with limited English proficiency who wish to participate in this process and need an alternative accessible format of the presentation materials or translation materials. If you require an accommodation, please contact the Department of Commerce at DOCConPlan@mt.gov no later than 5:00 p.m. on January 20, 2023.

El Departamento de Comercio hará adaptaciones razonables para las personas con discapacidades o personas con dominio limitado del inglés que deseen participar en este proceso y necesitan un formato accesible alternativo de materiales de presentación o servicios de traducción. Si necesita una adaptación, comuníquese con El Departamento de Comercio en DOCConPlan@mt.gov antes de las 5:00 p.m. del 20 de enero de 2023.

Have questions? Email DOCConPlan@mt.gov



MNAXLP

*** Proof of Publication ***

HELENA INDEPENDENT RECORD
2222 Washington St
Helena, MT 59602
Ph: (406) 447-4000

BUT/HEL - MONTANA NEWSPAPER ASSOCIATION

825 GREAT NORTHERN BLD
HELENA MT 59601

ORDER NUMBER 140097

The undersigned, being duly sworn, deposes and says. That she is the principal clerk of The Helena Independent Record, a newspaper of general circulation published daily in the City of Helena, in the County of Lewis & Clark, State of Montana, and has charge of the Advertisements thereof.

Mark below if certification for the State of Montana
I hereby certify that I have read sec. 18-7-204 and 18-7-205, MCA, and subsequent revisions, and declare that the price or rate charged the State of Montana for the publication for which claim is made in printed copy in the amount of \$_____ is not in excess of the minimum rate charged any other advertiser for publication of advertisement, set in the same size type and published for the same number of insertions, further certify that this claim is correct and just in all respects, and that payment or credit has not been received.

Connie Kay

STATE OF MONTANA
County of Lewis & Clark

On this day of Jan-18, 2023 before me, the undersigned, a Notary Public for the State of Montana, personally appeared Connie Kay known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he/she executed same. IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal the day and year first above written.

Section: Legal

Category: 0701 Legals Helena

PUBLISHED ON: 01/18/2023

TOTAL AD COST: 246.80

FILED ON: 1/18/2023

Sandra A. Cox
NOTARY PUBLIC for the State of Montana
Residing at Billings, MT

My commission expires: 8/31/2025

The Montana Department of Commerce Announces the Public Comment Period for the HOME-ARP Allocation Plan and Substantial Amendments to the 2020 and 2021 Annual Action Plans (AAP).

The following documents are available for public comment from January 17, 2023, to February 17, 2023.

- The HOME-ARP Allocation Plan summarizes the actions, activities, and resources available for the State of Montana's HOME-ARP program. The US Department of Housing and Urban Development allocated \$11 million to Commerce to address housing needs for Qualifying Populations through the production of permanent homes, non-congregate shelter and/or supportive services.
- The substantial amendment to the 2020-2024 Consolidated Plan Year 1 AAP to redistribute Community Development Block Grant (CDBG) funds from economic development activities to public and community facilities; and
- The substantial amendment to the 2021-2022 AAP to redistribute CDBG funds from economic development activities to public and community facilities.

All documents are available electronically at <https://housing.mt.gov/Community-Housing/HOME-ARP>, <https://commerce.mt.gov/Consolidated-Plan/Documents>, and as a hard-copy by request. All comments must be submitted to the address or email below no later than 5:00 p.m. on February 17, 2023.

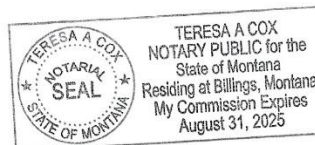
Montana Department of Commerce
Community MT Division
Attention: Con Plan
301 S. Park Avenue
P.O. Box 200523
Helena, MT 59620-0523
DOCConPlan@mt.gov

The public hearing will be held on Zoom and presentation materials will be available on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents> prior to the public hearing. The State of Montana will consider any comments or views provided in writing during the specified comment periods or orally during the public hearing. To participate in the public hearing, please follow the information on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents>.

The Department of Commerce will make reasonable accommodations for persons with disabilities or persons with limited English proficiency who wish to participate in this process and need an alternative accessible format of the presentation materials or translation materials. If you require an accommodation, please contact the Department of Commerce at DOCConPlan@mt.gov no later than 5:00 p.m. on January 20, 2023.

El Departamento de Comercio hará adaptaciones razonables para las personas con discapacidades o personas con dominio limitado del inglés que deseen participar en este proceso y necesitan un formato accesible alternativo de materiales de presentación o servicios de traducción. Si necesita una adaptación, comuníquese con El Departamento de Comercio en DOCConPlan@mt.gov antes de las 5:00 p.m. del 20 de enero de 2023.

Have questions? Email DOCConPlan@mt.gov
January 18, 2023 140097 MNAXLP



*** Proof of Publication ***

THE MISSOULIAN
2291 W Broadway, Suite 5A
Missoula, MT 59801
Phone: (406) 523-5236

MIS - MONTANA NEWSPAPER ASSOCIATION

825 GREAT NORTHERN BLVD
HELENA MT 59601

ORDER NUMBER 140104

The undersigned, being duly sworn, deposes and says. That she is the principal clerk of The Missoulian, a newspaper of general circulation published daily in the City of Missoula, in the County of Missoula, State of Montana, and has charge of the Advertisements thereof.

Mark below if certification for the State of Montana

I hereby certify that I have read sec. 18-7-204 and 18-7-205, MCA, and subsequent revisions, and declare that the price or rate charged the State of Montana for the publication for which claim is made in printed copy in the amount of \$ _____ is not in excess of the minimum rate charged any other advertiser for publication of advertisement, set in the same size type and published for the same number of insertions, further certify that this claim is correct and just in all respects, and that payment or credit has not been received.

STATE OF MONTANA
County of Missoula

On this day of Jan 18, 2023 before me, the undersigned, a Notary Public for the State of Montana, personally appeared Connie Cox known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he/she executed same. IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal the day and year first above written.

Section: Legal

Category: 0704 Legals Missoula MNAXLP

PUBLISHED ON: 01/18/2023

TOTAL AD COST: 242.60

FILED ON: 1/18/2023

NOTARY PUBLIC for the State of Montana
Residing at Billings, MT

My commission expires: 8/31/2025

The Montana Department of Commerce Announces the Public Comment Period for the HOME-ARP Allocation Plan and Substantial Amendments to the 2020 and 2021 Annual Action Plans (AAP).

The following documents are available for public comment from January 17, 2023, to February 17, 2023.

- The HOME-ARP Allocation Plan summarizes the actions, activities, and resources available for the State of Montana's HOME-ARP program. The US Department of Housing and Urban Development allocated \$11 million to Commerce to address housing needs for Qualifying Populations through the production of permanent homes, non-congregate shelter and/or supportive services.
- The substantial amendment to the 2020-2024 Consolidated Plan Year 1 AAP to redistribute Community Development Block Grant (CDBG) funds from economic development activities to public and community facilities; and
- The substantial amendment to the 2021-2022 AAP to redistribute CDBG funds from economic development activities to public and community facilities.

All documents are available electronically at <https://housing.mt.gov/Community-Housing/HOME-ARP>, <https://commerce.mt.gov/Consolidated-Plan/Documents>, and as a hardcopy by request. All comments must be submitted to the address or email below no later than 5:00 p.m. on February 17, 2023.

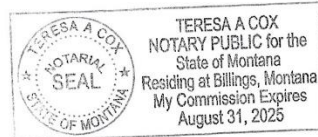
Montana Department of Commerce
Community MT Division
Attention: Con Plan
301 S. Park Avenue
P.O. Box 200523
Helena, MT 59620-0523
DOCConPlan@mt.gov

The public hearing will be held on Zoom and presentation materials will be available on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents> prior to the public hearing. The State of Montana will consider any comments or views provided in writing during the specified comment periods or orally during the public hearing. To participate in the public hearing, please follow the information on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents>.

The Department of Commerce will make reasonable accommodations for persons with disabilities or persons with limited English proficiency who wish to participate in this process and need an alternative accessible format of the presentation materials or translation materials. If you require an accommodation, please contact the Department of Commerce at DOCConPlan@mt.gov no later than 5:00 p.m. on January 20, 2023.

El Departamento de Comercio hará adaptaciones razonables para las personas con discapacidades o personas con dominio limitado del inglés que deseen participar en este proceso y necesitan un formato accesible alternativo de materiales de presentación o servicios de traducción. Si necesita una adaptación, comuníquese con El Departamento de Comercio en DOCConPlan@mt.gov antes de las 5:00 p.m. del 20 de enero de 2023.

Have questions? Email DOCConPlan@mt.gov
January 18, 2023 140104



*** Proof of Publication ***

RAVALLI REPUBLIC
232 W. Main St.
Hamilton, MT 59840

MT Standard/MNA Statewide Buy

25 W GRANITE
BUTTE MT 59701

MIS-Montana Newspaper Association
825 Great Northern Blvd
Helena MT 59601

ORDER NUMBER 140137

The undersigned, being duly sworn, deposes and says. That she is the principal clerk of The Ravalli Republic, a newspaper of general circulation, printed in Lewis & Clark County, Montana, and published in the City of Hamilton, in the County of Ravalli, State of Montana, and has charge of the Advertisements thereof.

Mark below if certification for the State of Montana

I hereby certify that I have read sec. 18-7-204 and 18-7-205, MCA, and subsequent revisions, and declare that the price or rate charged the State of Montana for the publication for which claim is made in printed copy in the amount of \$_____ is not in excess of the minimum rate charged any other advertiser for publication of advertisement, set in the same size type and published for the same number of insertions, further certify that this claim is correct and just in all respects, and that payment or credit has not been received.

STATE OF MONTANA
County of Ravalli

On this day of Jan 17, 2023, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Terese Cox known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he/she executed same. IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal the day and year first above written.

Section: Legal

Category: 0706 Legals Ravalli

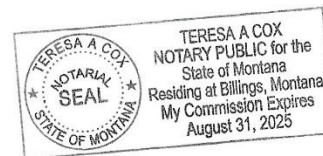
PUBLISHED ON: 01/15/2023

TOTAL AD COST: 82.90

FILED ON: 1/17/2023

Terese Cox
NOTARY PUBLIC for the State of Montana
Residing at Billings, MT

My commission expires: 8/31/2025



***** Proof of Publication *****

The Montana Department of Commerce Announces the Public Comment Period for the HOME-ARP Allocation Plan and Substantial Amendments to the 2020 and 2021 Annual Action Plans (AAP).

The following documents are available for public comment from January 17, 2023, to February 17, 2023.

- The HOME-ARP Allocation Plan summarizes the actions, activities, and resources available for the State of Montana's HOME-ARP program. The US Department of Housing and Urban Development allocated \$11 million to Commerce to address housing needs for Qualifying Populations through the production of permanent homes, non-congregate shelter and supportive services.
- The substantial amendment to the 2020-2024 Consolidated Plan Year 1 AAP to redistribute Community Development Block Grant (CDBG) funds from economic development activities to public and community facilities; and
- The substantial amendment to the 2021-2022 AAP to redistribute CDBG funds from economic development activities to public and community facilities.

All documents are available electronically at <https://housing.mt.gov/Community-Housing/HOME-ARP>, <https://commerce.mt.gov/Consolidated-Plan/Documents>, and as a hardcopy by request. All comments must be submitted to the address or email below no later than 5:00 p.m. on February 17, 2023.

Montana Department of Commerce
Community MT Division
Attention: Con Plan
301 S. Park Avenue
P.O. Box 200523
Helena, MT 59620-0523
DQCConPlan@mt.gov

The public hearing will be held on Zoom and presentation materials will be available on Commerce's website at <https://housing.mt.gov/community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents> prior to the public hearing. The State of Montana will consider any comments or views provided in writing during the specified comment periods or orally during the public hearing. To participate in the public hearing, please follow the information on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents>.

The Department of Commerce will make reasonable accommodations for persons with disabilities or persons

***** Proof of Publication *****

with disabilities or persons with limited English proficiency who wish to participate in this process and need an alternative accessible format of the presentation materials or translation materials. If you require an accommodation, please contact the Department of Commerce at DOCConPlan@mt.gov no later than 5:00 p.m. on January 20, 2023.

El Departamento de Comercio hará adaptaciones razonables para las personas con discapacidades o personas con dominio limitado del inglés que deseen participar en este proceso y necesiten un formato accesible alternativo de materiales de presentación o servicios de traducción. Si necesita una adaptación, comuníquese con El Departamento de Comercio en DOCConPlan@mt.gov antes de las 5:00 p.m. del 20 de enero de 2023.

Have questions? Email DOCConPlan@mt.gov
RR

*** Proof of Publication ***

THE BUTTE MONTANA STANDARD
25 W Granite St
Butte, MT 59701
Ph: 406-496-5500

BUT/HEL - MONTANA NEWSPAPER ASSOCIATION

825 GREAT NORTHERN BLD
HELENA MT 59601

ORDER NUMBER 140094

The undersigned, being duly sworn, deposes and says. That she is the principal clerk of The Montana Standard, a newspaper of general circulation published daily in the City of Butte, in the County of Silver Bow, State of Montana, and has charge of the Advertisements thereof.

Mark below if certification for the State of Montana

I hereby certify that I have read sec. 18-7-204 and 18-7-205, MCA, and subsequent revisions, and declare that the price or rate charged the State of Montana for the publication for which claim is made in printed copy in the amount of \$_____ is not in excess of the minimum rate charged any other advertiser for publication of advertisement, set in the same size type and published for the same number of insertions, further certify that this claim is correct and just in all respects, and that payment or credit has not been received.

STATE OF MONTANA
County of Silver Bow

On this day of JAN. 18, 2023 before me, the undersigned, a Notary Public for the State of Montana, personally appeared CONNIE LAN known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he/she executed same. IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal the day and year first above written.

Section: Legal

Category: 0702 Legals Butte

PUBLISHED ON: 01/18/2023

TOTAL AD COST: 201.00

FILED ON: 1/18/2023

NOTARY PUBLIC for the State of Montana
Residing at Billings, MT

My commission expires: 8/31/2025

The Montana Department of Commerce Announces the Public Comment Period for the HOME-ARP Allocation Plan and Substantial Amendments to the 2020 and 2021 Annual Action Plans (AAP).

The following documents are available for public comment from January 17, 2023, to February 17, 2023.

- The HOME-ARP Allocation Plan summarizes the actions, activities, and resources available for the State of Montana's HOME-ARP program. The US Department of Housing and Urban Development allocated \$11 million to Commerce to address housing needs for Qualifying Populations through the production of permanent homes, non-congregate shelter and/or supportive services.
- The substantial amendment to the 2020-2024 Consolidated Plan Year 1 AAP to redistribute Community Development Block Grant (CDBG) funds from economic development activities to public and community facilities; and
- The substantial amendment to the 2021-2022 AAP to redistribute CDBG funds from economic development activities to public and community facilities.

All documents are available electronically at <https://housing.mt.gov/Community-Housing/HOME-ARP>, <https://commerce.mt.gov/Consolidated-Plan/Documents>, and as a hard-copy by request. All comments must be submitted to the address or email below no later than 5:00 p.m. on February 17, 2023.

Montana Department of Commerce

Community MT Division

Attention: Con Plan

301 S. Park Avenue

P.O. Box 200523

Helena, MT 59620-0523

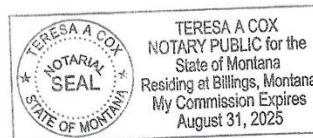
DOCConPlan@mt.gov

The public hearing will be held on Zoom and presentation materials will be available on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents> prior to the public hearing. The State of Montana will consider any comments or views provided in writing during the specified comment periods or orally during the public hearing. To participate in the public hearing, please follow the information on Commerce's website at <https://housing.mt.gov/Community-Housing/HOME-ARP> and <https://commerce.mt.gov/Consolidated-Plan/Documents>.

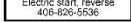
The Department of Commerce will make reasonable accommodations for persons with disabilities or persons with limited English proficiency who wish to participate in this process and need an alternative accessible format of the presentation materials or translation materials. If you require an accommodation, please contact the Department of Commerce at DOCConPlan@mt.gov no later than 5:00 p.m. on January 20, 2023.

El Departamento de Comercio hará adaptaciones razonables para las personas con discapacidades o personas con dominio limitado del inglés que deseen participar en este proceso y necesiten un formato accesible alternativo de materiales de presentación o servicios de traducción. Si necesita una adaptación, comuníquese con El Departamento de Comercio en DOCConPlan@mt.gov antes de las 5:00 p.m. del 20 de enero de 2023.

Have questions? Email DOCConPlan@mt.gov
January 18, 2023 140094 MNAXLP



PICKUPS



 Find us on:
facebook®
www.facebook.com/DailyInterLake

[illegible]