

RESOLUTION NUMBER 1146
BEFORE THE BOARD OF COMMISSIONERS OF THE
HOUSING AUTHORITY OF BILLINGS
RESOLUTION AUTHORIZING ACCEPTANCE OF THE
2021 PHA ANNUAL PLAN

WHEREAS, the Housing Authority of Billings annually updates its PHA Annual Plan in accordance with Housing and Urban Development Department regulations and the Housing Authority of Billings' own policies,

NOW THEREFORE BE IT RESOLVED that the Members of the Housing Authority of Billings Board of Commissioners hereby resolve to adopt a 2021 PHA Annual Plan containing the attached information.

Effective: April 14th, 2021.

AYES:

NOES:

ABSENT:

ABSTAIN:

SEAL

Michael Samson, Board Chairperson

Patti Webster, Secretary of the Board of Commissioners

Date: _____

Attachment

MT001a2021

Statement of Housing Needs and Strategy for Addressing Housing Needs:

HomeFront, formerly known as Housing Authority of Billings will consult with the City of Billings staff and use the Consolidated Plan and Impediments to Fair Housing Report as a guide for serving those in need. HomeFront will use its own knowledge of the over 1,700 families we serve, the 1,948 households residing on the Section 8 waiting list and the 3,820 families residing on the public housing waiting list in terms of the various populations in our community who need to be served.

We will continue to work closely with the City of Billings Community Development Office and Montana Housing to assess and provide housing services throughout our community.

HomeFront will continue to keep a 98% - 100% occupancy percentage or above. The Public Housing, HOME, Section 8 new construction, and tax credit units are modernized, and are sought after rentals by our clientele.

We will strive to be continuous high performers in both the Public Housing and Section 8 assessments, as we currently are.

The staff will be trained to be responsive to client needs, and assist in providing links to the community to provide a hand up to self-sufficiency when possible.

We will continue to apply for HCV Vouchers, VASH Vouchers, HOME, and CDBG Funding, and Tax Credits to deliver housing services to the low income in our community and any other programs that can provide affordable housing stock to Billings. We will analyze bedroom size needs when applications are made, via market studies, the Consolidated Plan, and our own waiting lists. The Housing Authority will partner with State, City, Neighbor Works - HOME Center, CHODO's and other organizations to deliver affordable housing to our community; sole sourcing with existing CHODO's in our community for development.

The Energy Performance contract will be in its fourth year of subsidy with single-family home tenants paying their own water bills.

The Housing Authority continues to streamline processes, in the occupancy field, tenant and landlord communications, and financial needs through electronic systems assist.

The Housing Authority is in the process of working with the residents, community and Board to create a plan to disposition all of the single-family homes in our public housing portfolio. We hope to have all 58 homes dispositioned by 2022.

The Housing Authority will continue to train staff in keeping up with regulations, with limited dollars.

Through our re-branding and strategic plan process, the Housing Authority of Billings has ensured more efficient ways to communicate with those we serve, community members and our Board. With a new, dynamic website, phone system and Board Portal, efficient communication is our priority.

The Housing Authority has implemented safety procedures for staff and clients during this COVID-19 pandemic to ensure we can safely work with, make repairs for and complete required inspection of our units. This continues to ensure safe, sanitary and healthy units for our family when they need it the most.

We fully understand that partnering with other municipal, private, and public agencies is the pathway to future successful developments.

Attachment			
MT001b2021			
Financial Resources			
Anticipated Financial Changes for 2021			
	OCAF	Award or Annualized Amount	
Operating Fund		\$987,718	(last year's amount) This Year's amount has not been calculated but will be completed by 3/9/21 HUD due date
Capital Fund		\$632,370	2020 Capital Fund award
HCV Section 8		\$4,559,391	Expected Proration is 99.344%
HCV Section 8 Admin Fee		\$634,870	Expected Proration is 83.832%
Mainstream 5		\$265,920	New award of 40 vouchers to start March 1, 2021
Mainstream 5 Admin Fee			HUD hasn't notified us as to this amount yet
Pleasantview Subsidy	\$924,600	\$512,470	OCAF effective October 1, 2020 \$924,600
Laurel Gardens Subsidy	\$200,796	\$68,427	OCAF effective June 1, 2021 \$200,796
Rents for all programs			Estimated based on subsidies when received unknown to date

Attachment

MT001c2021

Written Statement Defining Significant Amendment/Modification

The PHA will consider an amendment a substantial deviation/modification if it proposes a project that is not listed in the five year plan, or that changes the cost of the project more than fifty percent.

Attachment

MT001d2021

Goals and Objectives Progress Report 2020

Rebrand from Housing Authority of Billings to HomeFront, Partners for a Better Billings:

The agency is rebranding after various community and resident meetings showed that who we are and what we do is not reflected in our name or logo. New website is also included.

Expand the supply of assisted housing:

HomeFront of Billings, in collaboration with our community CoC (Continuum of Care) and Child Welfare agency applied for 25 FUP vouchers. We are currently in the process of serving our first homeless youth with that program.

We will apply for any additional Housing Choice Vouchers (HCV) as they are advertised by HUD and that meet the needs identified by our community needs assessment.

We applied for, and received, 40 Mainstream Vouchers which will come on board 3/1/2021.

We will apply for 58 tenant protection vouchers with the demo-dispo of our 58 single-family homes.

Maintain Public Housing vacancy rate: The Public Housing rate in June of 2020 was 98 %. This helped our agency to be designated as a high performer again.

Leverage private or other public funds to increase additional housing opportunities: With the demo/dispo of our 58 single-family homes, we will be able to leverage the net profit from the sale to ensure an affordable housing development fund.

We will continue to assess community needs, available funding opportunities and competition to ensure we make smart development decisions.

We will continue to work with the City of Billings as they finalize the project re-code for our city; hopefully enabled to utilize park lands on the city's disposition list for development of affordable housing.

Acquire and build more units:

Continue to assess the need for additional units and develop as able: Staff assessment of waiting lists and lease up rates on an ongoing basis are reviewed to determine need. Market studies, the Billings Housing Needs Assessment and the Consolidated Plan are tools used to assess the affordable housing needs in our community.

HAB Development, an instrumentality of HomeFront, acquired Laurel Gardens, a 30 unit project based Section 8 property, with HAP contract. We are currently working with the HRDC VII Energy Assistance Program to perform assessments and improvements.

We will work further with the Charter Housing Concept in community development.

To apply for any affordable housing programs: HomeFront reviews and assesses any appropriate funding applications we are aware of to determine viability of an application and the existing need for more units. Other than tax credit units and HOME there are few avenues to increase affordable housing.

Improve the quality of assisted housing - Objectives: Create a maintenance training program for not only our agency, but for other property management maintenance staff in our community. If we train them correctly, it will improve the quality of assisted housing in our community.

Actively engage with CoC to act as an unadvertised Front Door Agency with our CoC Coordinated Entry System. We will be assessing homeless with the Service Point HMIS system.

Improve public housing management: The PHAS score was 90, with occupancy rate improved but deductions for other areas. HomeFront is a High Performer but will strive for continued improvement.

As a High Performer, HomeFront receives a small additional amount of Capital Fund dollars to assist with its continued modernization efforts. Also, REAC inspections happen less often.

Public Housing is working on a re-write of the Admissions and Occupancy Policy and a new procedure manual.

We have also implemented and expanded an eligibility department.

Improve the voucher program management: FY 2020 saw HomeFront continue to be 100% High Performer. Streamlining program efficiencies continued with reduced administrative fees, such as the creation of the Extravaganza. In 2020 the HCV program maintained a steady leasing schedule which proved to be very beneficial to HomeFront in both monetary and staff measures. We have endured the effects of COVID 19 on our HCV program – over-leasing and overspending. Leadership was innovative in finding solutions to the issue that were completely out of our control. Collaborating with the State HCV program proved very beneficial. In the process of working with a variety of HCV professionals to ensure our program integrity and compliance with HUD.

The HCV program completed a full re-write of the Administrative Plan. The plan is under Leadership review and will be submitted to Board in the Spring of 2021.

The HCV program was made whole by adding another Housing Specialist. This increase in FTE will also allow for the expansion of the HCV program.

Increase customer satisfaction:

COVID Protocols have eliminated most face-to-face meetings in our office unless specifically requested by program applicants/participants.

We have added front office cameras and communication devices as well as a camera for our agency drop box that is available to families 24/7.

The agency has found many efficiencies for us and those we serve during this time while maintaining priority for the health and safety of our team and those we serve.

A new Energy Performance Grant was applied for in 2016 to provide a reduction for the residents in Public Housing in their utility costs, as well as savings to the PHA to save utility costs. HomeFront is seeing a large savings in utility costs, especially in water consumption.

The garden, food security program, also continues with the assistance of Master Gardener volunteers.

Part of our re-branding process is the development and implementation of a new website that will have interactive features including forms.

Concentrate on efforts to renovate and modernize public housing units: Team meetings for management twice a month continue to assist in streamlining programs in a smaller budget environment.

Renovate or modernize public housing units: Our capital funds always make the obligation and expenditure dates, our 5 year plan and annual plans are done strategically to ensure the work is prioritized based on need and HUD mandates.

Continue to provide training in all required program elements: Executive Staff participates in Organizational Excellence, NAHRO, AMHA, Tax Credit, Fair Housing, IT systems, Financial, Administrative, Maintenance and inspection training as budgets allow.

COVID has afforded our team and commissioners with more opportunities for virtual trainings.

A re-write of our agency Reasonable Accommodation policies and procedures was completed to ensure more efficient communication with staff, residents and 504 coordinator.

Asset Management has been implemented: One Amp remains as the scattered site nature of the PHA and no more than 40 units in one area. There is a COCC and two Asset Managers, a Senior Asset Manager with maintenance staff assigned to specific projects.

Examine public housing conversion options and potential implementation: RAD will be examined when favorable conversion dollars are in place.

Examine demo/disposition of all public housing single family homes and potential implementation. This process began in 2019/2020 and continues with the addition of a consultant to help guide our agency in the process. Our plan is to have the disposition completed by the end of our fiscal year, 6/30/2021.

Continue to look for development opportunities:

Increase assisted housing choices- objectives:

Provide voucher mobility counseling: This is done at every Section 8 briefing and individually.

Landlord HCV outreach: Newspaper, email, and staff attend the Yellowstone Property Managers meetings and the Landlord Association meetings in Billings on a regular basis to encourage them to participate in the HCV program.

We are also exploring a way to make landlord engagement meaningful for our agency and the landlords we work with and potential landlords.

Increase voucher payment standards: Currently the majority of voucher payment standards are set at 100%-110%, depending on bedroom size. Fair Market rents decreased for some of the bedroom sizes. We will continue to adjust payment standards as statistics and budgets indicated the need.

Implement the homeownership program: Our goal is to assist five new homeowners each year with the HCV homeownership program. With the demo/dispo of our public housing single-family homes, we are hoping to assist even more in 2021

Monitor the voucher program payment standards to stay within HUD budgets: This is done on an ongoing basis.

A local preference:

HomeFront now has three local preferences, all with equal weight. The three preferences are for the HCV program only:

- 1) Family Reunification (10 Vouchers) August 2013
- 2) Domestic Violence (15 vouchers) May 2018
- 3) Homeless (30 Vouchers) March 2019

The Public Housing program is reviewing whether to implement the local preferences in their program as well.

Provide an improved living environment-Objectives:

Implement and deconcentrate poverty by bring higher income public housing households into lower income development: continue the first come first serve on the waiting list policy, so a mix of incomes are generated.

Food security initiative: Fund a part-time garden manager, as budget allows, to continue sustainability along with funding opportunities being explored by VISTA.

Energy measures: An ESCO contract with Johnson Controls, construction was completed in 2016. HA will also explore other energy saving measures to include, but not limited to, solar energy.

Youth literacy: A literacy program was implemented in 2016 at the family investment center. We continue our efforts with the book giveaway program. We are the recipients of free books from National Book Foundation. This past year we have received over 5,000 books. All families receive books when they come to our office. We also work with the Public Library Bike Mobile Program in providing free books to them for distribution.

We have collaborated with AWARE to provide an early child Head Start classroom/childcare at our Family Investment Center located at 473 Bunting. This facility is completely ADA accessible, offering an opportunity for an underserved population.

Promote self-sufficiency and asset development of assisted households- Objectives:

Increase the number and percentage of employed persons in assisted families: Encourage clients to participate in the Family Self-Sufficiency program, and other links to the community. Begin an FSS Program with the Public Housing Program. First families were enrolled effective March 2019.

Provide or attract supportive services to improve assistance recipients' employability: Via the FSS program and individual counseling through HRDC, and the HOME Center.

Provide supportive services to increase independence for the elderly or families with disabilities: provide opportunities for homeownership through Section 8 and the newsletters.

Our agency is an active member of our local CoC and has designated staff that participate in our local coordinated entry system for the homeless, which is made up of mostly the disabled population.

Provide Section 3 opportunities for clients: Through newsletters, contractor advertisement etc.

Ensure equal opportunity and affirmatively further fair housing – Objective:

Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability: Ensure policies are up to date and staff is trained.

Ensure staff are fully trained and that the agency 504 coordinator is trained. We have found different Fair Housing training; specific to maintenance personnel.

Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability: Outreach is done to affected groups on a regular basis as needed, affirmative marketing techniques are reevaluated and avenues or outreach added or deleted to maximize efforts.

Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required: There have been several new accessible units built and outreach performed to assist those with disabilities in our community. We just completed two new fully handicap accessible 4 bedroom units.

Determine need for additional accessible units in community: HomeFront will build the required percentages, those fully accessible will be filled with the disabled as needed. All our lower units built are made to be adaptable to full accessibility if needed. Had difficulty filling all accessible units this year.

Review affirmative action policies and update: A staff member is assigned to review all policies on an annual basis to assess needs and ensure policies don't interfere with our Fair Housing goals and regulations.

Continue to train staff in fair housing: Staff will be trained on a continuing basis, annually or biannually or when new staff or rules are transmitted, and, at many industry trainings. HomeFront has identified quality, job specific, fair housing training in an online environment that allows us to concentrate our training efforts.

Other PHA Goals and Objectives:

Have staff proficient in current HUD environment/hire consultants when necessary: Staff will be trained on HUD, Treasury regulations and other rules when necessary to conduct their jobs successfully.

Contracted with a local consultant to enlist community support for potential "Charter Housing" developments where we identify specific housing needs and collaborate with various community and state partners to bring the ideas to reality. This is currently in the development stage.

Provide staff with the technology and training necessary to perform their jobs: Staff will be trained on provider software as available and needed via Webinars.

Send staff to trainings to stay abreast of changes and learn how to implement them: NAHRO, AHMA Tax Credit, Inspections, Green Building, Energy Efficiency, etc. New HUD information

Provide training for management staff: Ongoing financial, procurement, leadership, development, technical and programmatic, statutory and regulatory will be attended. Leadership will also have more opportunities for excellence training.

Community Innovations:

Continue to be an active participating agency with our local CoC on the state CoC Board, local leadership team and the bi-weekly coordinated entry case conferencing.

HAB Development purchased a hotel with NFF funds in response to the emergency pandemic in our community to provide low barrier, non-congregate care and non-congregate Quarantine & Isolation for those most vulnerable.

Actively participate in the community Substance Abuse Connect Coalition for problem solving and opportunities.

Engage the staff, board, and community stakeholders in strategic planning and rebranding.

Look for entrepreneurial opportunities for our agency in development and 3rd party property management.

Provide all staff with opportunities to serve in the community given their interests and passion.

Attachment

MT001e2021

**Policy revisions
7/1/2019/to 6/30/2020**

Public Housing

Summary of Changes

2020 Admissions and Continued Occupancy Policy (ACOP)

Billings, Yellowstone County, Montana

Effective dates 7/1/2019 to 6/30/2020

Below is a summary of changes that were incorporated into the Admissions and Continued Occupancy Policy (ACOP) from 7/1/2019 to 6/30/2020.

Lease addendum: Yearly Maintenance Labor Rate Charges update: Effective 11/1/2019

Lease addendum: Service Agency repayment money you received from an agency will be paid back to them when you leave the public housing program. Effective 11/1/2019

VIII. Utilities

A. Resident-Paid Utilities – Updated utility amounts to reflect adjustments to the allowance amounts done annually. This was for all Public Housing units. (effective 1/1/2020)

IX. Choice of Rent

B. Annual Update of Flat Rents – After a review, Flats rents were updated with the appropriate adjustments, which include the changed utility amounts. This is done annually. (effective date 1/1/2020)

3/1/2021 to 6/30/2021 we will continue a complete overhaul of the ACOP.

Attachment
MT001f2021

Summary of Changes
Housing Choice Voucher (HCV) Administrative Plan

7/1/2019-6/30/2020

Below is a summary of changes that were incorporated into the HCV Administrative Plan.

Chapter 4: Applications, Waiting List and Tenant Selection

- Section 4.III.C. Selection Method – Added paragraph (3) preference to the Housing Choice Voucher program waiting list for 30 families meeting the definition of literally homeless. (effective 1/1/2019)

Chapter 6: Income and Subsidy Determinations

- 6-I.G. ASSETS [24 CFR 5.609(b)(3) and 24 CFR 5.603(b)] – Amended as follows:

Imputing Income from Assets [24 CFR 5.609(b)(3)]

When net family assets are \$5,000 or less, the PHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of \$5,000, the PHA will include in annual income the greater of (1) the actual income derived from the assets or (2) the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by the current PHA-established passbook savings rate.

PHA Policy

The PHA-established passbook savings rate will be reviewed annually and set at the FDIC posted Savings National Rate in effect at the time of review. (effective 7/1/2019)

Payment Standards

1. Based on release of new Fair Market Rents (FMR) – Payment standard study was conducted and payment standards revised. New payments standards ranged from 100% to 110% of HUD FMR. Effective 1/1/2020

Chapter 15: Special Housing Types

- Manufactured home space rental was removed.
- Manufactured home space rental HAP contracts in effect 1/1/2020 will continue to be honored, but no new HAP contracts for this type of housing would be executed except if needed as a reasonable accommodation for a person with a disability.

Introduction:

PHA Policy

Families will be able to use the following special housing types:

Homeownership

Families will not be permitted to use any other special housing types, unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities.

Manufactured home space rental HAP Contracts in effect 1/1/2020 will continued to be honored. No new HAP Contracts for manufactured home space rental will be executed except if needed as a reasonable accommodation for a person with a disability.

- Section 15-VI.A. was modified to meet requirements of FR Notice on Manufactured Homes dated 1/18/2017.

PART VI: MANUFACTURED HOMES

[24 CFR 982.620 through 982.624; FR Notice; FR Notice 1/18/17]

15-VI.A. OVERVIEW

A manufactured home is a manufactured structure, transportable in one or more parts, that is built on a permanent chassis, and designed for use as a principal place of residence. HCV-assisted families may occupy manufactured homes in two different ways.

(1) A family can choose to rent a manufactured home already installed on a space and the PHA must permit it. In this instance program rules are the same as when a family rents any other residential housing, except that there are special HQS requirements as provided in 15-VI.D below.

(2) HUD also permits an otherwise eligible family that owns a manufactured home to rent a space for the manufactured home and receive HCV assistance with the rent for the space as well as certain other housing expenses. PHAs may, but are not required to, provide assistance for such families.

15-VI.B. SPECIAL POLICIES FOR MANUFACTURED HOME OWNERS WHO LEASE A SPACE

Family Income

In determining the annual income of families leasing manufactured home spaces, the value of the family's equity in the manufactured home in which the family resides is not counted as a family asset.

Lease and HAP Contract

There is a separate Tenancy Addendum (Form 52642-a) and separate HAP Contract (Form 52642) for this special housing type.

15-VI.C. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION [FR Notice 1/18/17]

Payment Standards

The PHA payment standard for manufactured homes is determined in accordance with 24 CFR 982.505 and is the payment standard used for the PHA's HCV program. It is based on the applicable FMR for the area in which the manufactured home space is located.

The payment standard for the family is the lower of the family unit size (voucher size) or the payment standard for the number of bedrooms in the manufactured home.

Utility Allowance

The PHA must establish utility allowances for manufactured home space rental. For the first 12 months of the initial lease term only, the allowance must include an amount for a utility hook-up charge if the family actually incurred a hook-up charge because of a move. This allowance will not be given to a family that leases in place. Utility allowances for manufactured home space must not include the costs of digging a well or installing a septic system.

If the amount of the monthly assistance payment for a family exceeds the monthly rent for the manufactured home space (including the owner's monthly management and maintenance charges), the PHA may pay the remainder to the family, lender, or utility company.

Space Rent

The rent for the manufactured home space (including other eligible housing expenses) is the total of:

- The rent charged for the manufactured home space;
- Owner maintenance and management charges for the space;
- The monthly payments made by the family to amortize the cost of purchasing the manufactured home, including any required insurance and property taxes; and
- The applicable allowance for tenant-paid utilities.

Amortization Costs

The monthly payment made by the family to amortize the cost of purchasing the manufactured home is the debt service established at the time of application to a lender for financing the purchase of the manufactured home if monthly payments are still being made. Any increase in debt service due to refinancing after purchase of the home may not be included in the amortization cost. Debt service for set-up charges incurred by a family may be included in the monthly amortization payments made by the family. In addition, set-up charges incurred before the family became an assisted family may be included in the amortization cost if monthly payments are still being made to amortize the charges.

Housing Assistance Payment

The HAP for a manufactured home space under the housing choice voucher program is the lower of the payment standard minus the TTP or the manufactured home space rent (including other eligible housing expenses) minus the TTP.

Rent Reasonableness

Initially, and annually thereafter the PHA must determine that the rent for the manufactured home space is reasonable based on rents for comparable manufactured home spaces. The PHA must consider the location and size of the space, and any services and maintenance to be provided by the owner. By accepting the monthly HAP check, the owner certifies that the rent does not exceed rents charged by the owner for comparable unassisted spaces in the manufactured home park or elsewhere.

15-VI.D. HOUSING QUALITY STANDARDS

Under either type of occupancy described in 15-VI.A above, the manufactured home must meet all HQS performance requirements and acceptability criteria discussed in Chapter 8 of this plan. In addition, the following requirement applies:

Manufactured Home Tie-Down

A manufactured home must be placed on the site in a stable manner, and must be free from hazards such as sliding or wind damage. The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding.

PHA Policy

Currently, a HUD Waiver is in place for tie-down requirement. Effective 1-1-2020

Resolution 1119- PHA 5 Year Plan

Resolution 1125 – Adoption of COVID – 19 Waivers effective 7-29-2020

HomeFront FY2021 Annual Plan

Section 18 Disposition

58 Scattered site public housing units (addresses listed on following pages) - HomeFront (formerly Housing Authority of Billings) plans to dispose of 58 public housing scattered site units under Section 18 of the U.S. Housing Act of 1937, as amended in 1998. These 58 units, including 55 structures made up of 52 single family homes and 3 townhouse duplexes, scattered across the City of Billings, were acquired by HomeFront in the 1980's and early 1990's. Operating and managing these scattered site units is unsustainable for HomeFront, due to the distance between units and lack of uniformity of systems.

473 Bunting Street - HomeFront will also dispose of the Family Investment Center (FIC), MT001P006, located at 473 Bunting Street for less than fair market value. HomeFront is proposing to dispose of the FIC to its affiliate HAB Development Corporation. The FIC will continue to be used to benefit and serve low-income residents.

Section 18 of the U.S. Housing Act of 1937 authorizes housing authorities to dispose of public housing units with HUD approval if the units meet the criteria of HUD's current guidance. Housing authorities may choose to exercise this option for a variety of reasons, including the unsustainability of scattered-site units (scattered sites eligible are defined in HUD Public and Indian Housing Notice 2018-04 as generally a rental unit in non-contiguous buildings that contain four or fewer total units).

In accordance with 24 CFR 970.19, HomeFront will seek HUD disposition approval in April of 2021 in order to proceed with selling the scattered sites at fair market value. After HUD approves HomeFront's disposition application, all households currently living in the scattered site units will be provided a 90-day notice and HomeFront will provide one-on-one assistance for every scattered site household to find a subsidized unit to move to. Also, after receiving HUD disposition approval, HomeFront plans to apply for the maximum amount permitted, 58 tenant protection replacement vouchers, to offer the existing scattered site households. HUD will confirm the number and type of vouchers available to HomeFront.

HomeFront is disposing of 58 scattered site units (52 single family homes and 3 townhouse duplexes) included in MT001P013-013, MT001P015-015, MT001P019-019, and MT001P022-022. Below is a summary of the evaluation HomeFront conducted to determine to proceed with disposition of the scattered site units. A summary table of the scattered sites in HomeFront's Section 18 disposition application is provided on the following page.

- The distance varies, but some scattered sites are 15-miles apart
- 44 of the units are 3-bedroom units and 14 of the units are 4-bedroom units
- Number of bathrooms per unit range from 1 to 2.5
- The units were built in 1959-1980
- The unit sizes do not meet the current needs of those on the Public Housing Waiting List
- 90% of HomeFront's wait list is for households that need one to two-bedroom units
- One bedroom wait list has 2,598 households. Two-bedroom wait list has 688 households

Summary of HomeFront's Scattered Site Public Housing Unit Section 18 Disposition

Section 18 at Fair Market Value			
Sq. ft.	3 BR 960-2,618	4 BR 1,686-2,916	TOTAL
Single Family Units	38	14	52
Duplex Units	6	0	6
TOTAL	44	14	58

Section 18 at Less than Fair Market Value	
Sq. ft.	Non-dwelling 1,008
Single Family	1
TOTAL	1

Section 18 Demolition/Disposition and Use of Net Proceeds

The table below is a planning tool that HomeFront uses to inform HUD and other stakeholders of potential considerations for future demolition/disposition activities and replacement of properties in the portfolio. As any planned demolition or disposition is undertaken, HomeFront will seek to replace the units, using net proceeds, as long as the neighborhood is below city/county average poverty rates, are in an area of opportunity, and/or are part of a larger neighborhood revitalization plan. The objective is to provide safe quality housing that operates efficiently/effectively and meets the needs of the residents of Billings. Multiple approaches are being evaluated to continue to deliver quality sustainable housing units and to pursue the perseveration of sustainable affordable housing units that provide choice and opportunity for residents. To accomplish this objective, HomeFront will complete due diligence, draft development proposals for acquisition/rehabilitation and/or new construction and submit to HUD for review and approval.

362 non-contiguous (1-4 unit) scattered sites Section 18 activities planned

1 AMP	2 Number of Units	3 Type of Action	4 Status	5 Timeline (anticipated disposition)	6 Narrative
100	58 dwelling units	Disposition	Application to be Submitted in April 2021	June- October 2021	HomeFront will sell these scattered site units on the open market for fair market value and apply to HUD for 58 tenant protection vouchers.
100	1 Non- dwelling unit	Disposition	Application to be Submitted in April 2021	June 2021	HomeFront will sell the non-dwelling unit at 473 Bunting to HAB Development Corporation (a related entity).

HomeFront is submitting a Section 18 disposition application for the sites listed on the following pages.

HomeFront Scattered Site Section 18 Application (58 dwelling units, 1 non-dwelling unit)

Dev	PIC ID	Tax ID	Legal Description	St Add	Street Name	Zip Code	DOFA	Yr Built	BR	BA	Bldg Type	Bldg Sq Ft	Acres	Garage s in PIC
13	1301	CO9726	HARVEST SUBD 4TH FILING, S11, T01 S, R25 E, BLOCK 23, Lot 4	608	Acorn	59102	3/13/87	1982	3	2	SF	1,160	0.16	
19	1902	A23889	MOODY SUBD 2ND FILING, S23, T01 N, R26 E, BLOCK 1, Lot 8	905	Ahoy	59105	10/31/92	1980	4	2	SF	2,034	0.23	
15	1526	A24560	GALAXY SUBD, S21, T01 N, R26 E, BLOCK 5, Lot 3	662	Aries	59105	7/21/89	1987	3	1	SF	1,848	0.23	
22	2209	A23786	SAHARA SANDS 2ND FILING, S28, T01 N, R26 E, BLOCK 9, Lot 28	665	Aronson	59105	9/22/95	1982	3	2.5	SF	2,020	0.26	
15	1527	A23722	SAHARA SANDS 2ND FILING, S28, T01 N, R26 E, BLOCK 4, Lot 4	746	Aronson	59105	7/21/89	1979	3	2	SF	2,304	0.24	
15	1515	A09834	KOBER SUBD 3RD FILING, S36, T01 N, R25 E, BLOCK 13, Lot 11 - 12, AND W 3FT OF LT 10 AND E 11 FT OF LT 13	1823	Avenue E	59102	7/21/89	1959	3	1.5	SF	2,288	0.21	Detached garage
19	1904	A21909	SAHARA SANDS 1ST FILING, S28, T01 N, R26 E, BLOCK 8, Lot 7	689	Bazaar Exchange	59105	10/31/92	1979	3	2	SF	2,034	0.39	
13	1302	A23614	BUNTING SUBD, S10, T01 S, R26 E, BLOCK 16, Lot 2	410	Bunting	59101	3/13/87	1979	3	2	SF	2,016	0.15	
15	1525	A24036	TERRACE ESTATES SUB 1ST FILING, S20, T01 N, R26 E, BLOCK 10, Lot 16	873	Calico	59105	7/21/89	1979	3	2	SF	1,710	0.22	
13	1303	A24409	KINGS GREEN SUBD 1ST FILING, S15, T01 S, R26 E, BLOCK 2, Lot 16	3802	Cambridge	59101	3/13/87	1980	4	2	SF	1,686	0.12	
15	1528	A23736	SAHARA SANDS 2ND FILING, S28, T01 N, R26 E, BLOCK 4, Lot 18	447	Caravan	59105	7/21/89	1982	4	2	SF	2,146	0.23	

HomeFront Scattered Site Section 18 Application (58 dwelling units, 1 non-dwelling unit)

Dev	PIC ID	Tax ID	Legal Description	St Add	Street Name	Zip Code	DOFA	Yr Built	BR	BA	Bldg Type	Bldg Sq Ft	Acres	Garage s in PIC
15	1507	CO9690	HARVEST SUBD 3RD FILING, S11, T01 S, R25 E, BLOCK 16, Lot 7	575	Chokecherry	59102	7/21/89	1982	3	2	SF	1,209	0.16	
22	2205	CO9685	HARVEST SUBD 3RD FILING, S11, T01 S, R25 E, BLOCK 16, Lot 2	586	Chokecherry	59102	9/22/95	1982	3	1	SF	960	0.16	
13	1304	A21047	GOLDEN VIEW SUBD, S21, T01 N, R26 E, BLOCK 8, Lot 27	1320	Claim Jumper Ln	59105	3/13/87	1975	3	1.5	SF	1,232	0.25	
13	1305	A19341	AL'S SUBD FIRST, S09, T01 S, R26 E, BLOCK 1, Lot 5	4429	Clevenger	59101	3/13/87	1977	3	1	SF	1,530	0.18	
13	1306	A19340	AL'S SUBD FIRST, S09, T01 S, R26 E, BLOCK 1, Lot 4	4435	Clevenger	59101	3/13/87	1977	4	2	SF	1,902	0.18	
22	2207	CO9957	OLYMPIC PARK SUBD, S11, T01 S, R25 E, BLOCK 6, Lot 3	561	Coliseum	59102	9/22/95	1990	4	2	SF	1,704	0.16	
15	1506	C10101	OLYMPIC PARK SUBD, S11, T01 S, R25 E, BLOCK 13, Lot 2	714	Coliseum	59102	7/21/89	1985	3	2	SF	2,190	0.16	
22	2208	C10104	OLYMPIC PARK SUBD, S11, T01 S, R25 E, BLOCK 13, Lot 5	760	Coliseum	59102	9/22/95	1980	4	2	SF	2,034	0.16	
22	2202	A06266	DESCRO SUBD - 5TH FILING, S01, T01 S, R25 E, BLOCK 19, Lot 5	2425	Cook	59102	9/22/95	1961	3	1.5	SF	2,288	0.16	Detached garage
15	1517	A17610	WENTWORTH SUBD 2ND FILING, S06, T01 S, R26 E, BLOCK 4, Lot 3	1611	Cook	59102	7/22/89	1964	3	1	SF	2,016	0.17	Detached garage
22	2204	C01752	BICKLER SUBD, S02, T01 S, R25 E, BLOCK 1, Lot 19	3617	Custer	59102	9/22/95	1978	3	2	SF	1,788	0.23	
22	2201	A02294	AMVET PARK SUBD, S34, T01 N, R25 E, BLOCK 2, Lot 20 - 22	2619	Golden Blvd	59102	9/22/95	1972	3	1.5	SF	1,760	0.22	

HomeFront Scattered Site Section 18 Application (58 dwelling units, 1 non-dwelling unit)

Dev	PIC ID	Tax ID	Legal Description	St Add	Street Name	Zip Code	DOFA	Yr Built	BR	BA	Bldg Type	Bldg Sq Ft	Acres	Garage s in PIC
19	1903	A22942	KIMBERLEY HEIGHTS SUBD 5TH, S21, T01 N, R26 E, BLOCK 24, Lot 6	1016	Governors Blvd	59105	10/31/92	1978	3	2	SF	1,628	0.35	
19	1901	CO9815	HARVEST SUBD 4TH FILING, S11, T01 S, R25 E, BLOCK 33, Lot 5	3530	Granger Ave. W.	59102	10/31/92	1985	3	1	SF	1,008	0.16	
13	1307	CO9255	HARVEST SUBD 1ST FILING, S11, T01 S, R25 E, BLOCK 1, Lot 4	456	Green Spring Pl	59102	3/13/87	1980	3	2	SF	1,820	0.16	
15	1508	CO9263	HARVEST SUBD 1ST FILING, S11, T01 S, R25 E, BLOCK 1, Lot 12	471	Green Springs Pl	59102	7/21/89	1979	3	2	SF	2,496	0.16	
19	1905	A08628	HEIGHTS VIEW SUBD, S22, T01 N, R26 E, BLOCK 2, Lot 1A - 1B	217	Hiltop	59105	10/31/92	1972	4	2.5	SF	2,916	0.26	
13	1308	A14438	SOUTHWEST PARK SUBD 2ND FILING, S09, T01 S, R26 E, BLOCK 9, Lot 5 - 6, E20 FT LT 5 W40 FT LT 6	4129	Jansma	59101	3/13/87	1970	3	1.5	SF	1,920	0.14	
15	1522	CO1482	SUPERIOR HOMES SUBD, S15, T01 N, R26 E, BLOCK 4, Lot 7, S2 OF W135 FT LT 7	1937	Lake Elmo Dr	59105	7/21/89	1966	3	1.5	SF	1,480	0.29	
15	1503	C06993	SUN VILLAGE SUBD 2ND FILING, S01, T01 S, R25 E, BLOCK 4, Lot 12	2822	Lewis Ave	59102	7/21/89	1973	4	1.5	SF	1,740	0.17	
15	1504	C06982	SUN VILLAGE SUBD 2ND FILING, S01, T01 S, R25 E, BLOCK 4, Lot 1	2934	Lewis Ave	59102	7/21/89	1973	3	1.5	SF	2,016	0.17	
15	1509	C07000	SUN VILLAGE SUBD 2ND FILING, S01, T01 S, R25 E, BLOCK 4, Lot 19	2807	Manhattan Dr	59102	7/21/89	1975	3	1.5	SF	1,758	0.17	

HomeFront Scattered Site Section 18 Application (58 dwelling units, 1 non-dwelling unit)

Dev	PIC ID	Tax ID	Legal Description	St Add	Street Name	Zip Code	DOFA	Yr Built	BR	BA	Bldg Type	Bldg Sq Ft	Acres	Garage s in PIC
15	1513	A05956	DAHLSTROM SUBD, S35, T01 N, R25 E, Lot 3	2524	Mc Cormick Ln	59102	7/21/89	1972	4	2	SF	1,872	0.27	Detached garage
13	1309	A22952	SOUTHWEST PARK SUBD 4TH FILING, S09, T01 S, R26 E, BLOCK 11, Lot 2	4120	Murphy	59101	3/13/87	1977	3	1	SF	2,016	0.14	
15	1521	A20104	KIMBERLEY HEIGHTS SUBD 1ST, S21, T01 N, R26 E, BLOCK 17, Lot 7	1025	Nutter Blvd	59105	7/21/89	1977	4	3	SF	2,618	0.23	
15	1519	A19730	KIMBERLEY HEIGHTS SUBD 1ST, S21, T01 N, R26 E, BLOCK 1, Lot 7	825	Nutter Blvd	59105	7/21/89	1971	3	2	SF	1,920	0.23	
15	1520	A19806	KIMBERLEY HEIGHTS SUBD 1ST, S21, T01 N, R26 E, BLOCK 4, Lot 12	914	Nutter Blvd	59105	7/21/89	1985	4	2	SF	1,872	0.23	
15	1510	A18494	WESTWOOD ESTATE 3RD FILING, S35, T01 N, R25 E, BLOCK 7, Lot 50 - 51, & N3.67' LT 49 & S18' LT 52	1502	Patricia	59102	7/21/89	1972	4	1.5	SF	2,300	0.18	
15	1524	A23434	CENTENNIAL SUBD SECOND FILING, S21, T01 N, R26 E, BLOCK 7, Lot 11	1127	Patriot	59105	7/21/89	1979	3	2	SF	1,628	0.22	
15	1501	A20546	SOUTHWEST PARK SUBD 3RD FILING, S09, T01 S, R26 E, BLOCK 14, Lot 10	4102	Phillip	59101	7/21/89	1976	3	2	SF	2,016	0.23	
15	1502	A20541	SOUTHWEST PARK SUBD 3RD FILING, S09, T01 S, R26 E, BLOCK 14, Lot 5	4111	Phillip	59101	7/21/89	1976	3	1	SF	2,016	0.18	

HomeFront Scattered Site Section 18 Application (58 dwelling units, 1 non-dwelling unit)

Dev	PIC ID	Tax ID	Legal Description	St Add	Street Name	Zip Code	DOFA	Yr Built	BR	BA	Bldg Type	Bldg Sq Ft	Acres	Garage s in PIC
13	1310	A21494	RYAN SUBD, S12, T01 S, R25 E, BLOCK 4, Lot 10, 2ND AMND	344	Phyllis Circle	59102	3/13/87	1976	3	1.5	SF	2,208	0.14	Detached garage
13	1311	A21513	RYAN SUBD, S12, T01 S, R25 E, BLOCK 5, Lot 3, 2ND AMND	352	Phyllis Circle E	59102	3/13/87	1976	3	1.5	SF	2,208	0.14	
13	1313	A18481	WESTWOOD ESTATE 3RD FILING, S35, T01 N, R25 E, BLOCK 7, Lot 7	1605	Rehberg Ln	59102	3/13/87	1971	3	1	SF	1,392	0.19	
15	1511	A18454	WESTWOOD ESTATE 2ND FILING, S35, T01 N, R25 E, BLOCK 6, Lot 13	1825	Rehberg Ln	59102	7/21/89	1974	3	1.5	SF	2,016	0.19	Detached garage
15	1505	C10106	OLYMPIC PARK SUBD, S11, T01 S, R25 E, BLOCK 13, Lot 7	3637	Relay Dr	59102	7/21/89	1982	4	2	SF	2,016	0.16	
13	1312	A04612	CENTRAL HEIGHTS SUB 4TH FILING, S07, T01 S, R26 E, BLOCK 7, Lot 8	207	Santa Fe S.	59102	3/13/87	1959	3	1	SF	1,032	0.16	
15	1529	A24012	TERRACE ESTATES SUB 1ST FILING, S20, T01 N, R26 E, BLOCK 6, Lot 20	824	Sargeant At Arms	59105	7/21/89	1979	3	2	SF	1,898	0.22	
22	2206	C10143	OLYMPIC PARK SUBD, S11, T01 S, R25 E, BLOCK 14, Lot 21	750	Torch Dr	59102	9/22/95	1983	3	2	SF	1,686	0.17	
15	1523	A22249	LAKE HILLS SUBD 4TH FILING, S16, T01 N, R26 E, BLOCK 20, Lot 3	405	Wicks W Ln	59105	7/21/89	1978	4	2	SF	1,863	0.36	
13	1314	CO9289	HARVEST SUBD 2ND FILING, S11, T01 S, R25 E, BLOCK 4, Lot 15	3314	Windmill Circle	59102	3/13/87	1985	3	1	SF	1,600	0.16	

HomeFront Scattered Site Section 18 Application (58 dwelling units, 1 non-dwelling unit)

Dev	PIC ID	Tax ID	Legal Description	St Add	Street Name	Zip Code	DOFA	Yr Built	BR	BA	Bldg Type	Bldg Sq Ft	Acres	Garage s in PIC
13	1316	A02485	ARNOLD SUBD 2ND FILING, S06, T01 S, R26 E, BLOCK 2, Lot 16	2224- 2226	Yellowstone Ave	59102	3/13/87	1978	3	1.5	Duplex	3,886	0.28	
13	1315	A02494	ARNOLD SUBD 2ND FILING, S06, T01 S, R26 E, BLOCK 5, Lot 1, LT 1 BLK 5 ARNOLD SUB 2ND FIL AMD	2301- 2303	Yellowstone Ave	59102	3/13/87	1979	3	1.5	Duplex	4,656	0.30	
13	1318	A02495	ARNOLD SUBD 2ND FILING, S06, T01 S, R26 E, BLOCK 5, Lot 2, LT 2 BLK 5 ARNOLD SUB 2ND FIL AMD	2309- 2311	Yellowstone Ave	59102	3/13/87	1979	3	1.5	Duplex	3,764	0.30	
													109,124	11.36

Non-Dwelling Unit to be disposed of for less than FMV to Homefront affiliate

6	218	A23631	BUNTING SUBD, S10, T01 S, R26 E, BLOCK 3, LOT 3	473	Bunting St	59101		1982	N/A	N/A	Non-DU	1,008	0.17	
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**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Bill Cole, the Honorable Mayor
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

HomeFront (HAB) Formerly known as Housing Authority of Billings
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the


City of Billings, Montana
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
Consolidated Plan and the AI.

Provides for affordable housing, existing, new and rental assistance - all of which are affordable to the low
income population of our jurisdiction. The (HAB) assists both with data and money for the City's
Impediments to Fair Housing document. The HAB consults with the City Consolidated plan when
addressing the need for additional housing and programs for the population we serve.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official Bill Cole	Title Honorable Mayor
Signature 	Date 2-17-21

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0157
Expires 11/30/2023

"Public reporting burden for this collection of information is estimated to average 2.2 hours. This includes the time for collecting, reviewing, and reporting the data. The information requested is required to obtain a benefit. This form is used to verify allowable and reasonableness of grant expenses. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

PHA Name Housing Authority of Billings	Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: Date of CFFP:	MT01P00150121)	FFY of Grant: FFY of Grant Approval: 2021
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Type of Grant

- ☒ Original Annual Statement ☐ Reserve for Disasters/Emergencies
☐ Performance and Evaluation Report for Period Ending:

- ☐ Revised Annual Statement (revision no:
☐ Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	131,304			
3	1408 Management Improvements	65,652			
4	1410 Administration (may not exceed 10% of line 21)	65,652			
5	1480 General Capital Activity	393,914			
6	1492 Moving to Work Demonstration				
7	1501 Collateralization Expense / Debt Service Paid by PHA				
8	1503 RAD-CFP				
9	1504 RAD Investment Activity				
10	1505 RAD-CPT				
11	9000 Debt Reserves				
12	9001 Bond Debt Obligation paid Via System of Direct Payment				
13	9002 Loan Debt Obligation paid Via System of Direct Payment				
14	9900 Post Audit Adjustment				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0157
Expires 11/30/2023

Part I: Summary					
PHA Name: Housing Authority of Billings	Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: Date of CFFP:	MT01P00150121 FFY of Grant: FFY of Grant Approval: 2021			
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
15	Amount of Annual Grant:: (sum of lines 2 - 14)	656,522			
16	Amount of line 20 Related to LBP Activities				
17	Amount of line 20 Related Sect. 504, ADA, and Fair Housing Act Activities.				
18	Amount of line 20 Related to Security - Soft Costs				
19	Amount of line 20 Related to Security - Hard Costs				
20	Amount of line 20 Related to Energy Conservation Measures	199,064			
Signature of Executive Director *		Date	Signature of Public Housing Director		Date

* I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.

¹ To be completed for the Performance and Evaluation Report.

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³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0157
Expires 11/30/2023

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
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