

2025 5-Year Plan Components

MT001A.1 2025y	HUD-50075-5Y
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MT001B.4 2025y	VAWA Goals
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5-Year PHA Plan (for All PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 03/31/2024

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.																																
A.1	<p>PHA Name: <u>Housing Authority of Billings</u> PHA Code: <u>MT001</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2021</u> The Five-Year Period of the Plan (i.e. 2019-2023): <u>2021-2025</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B.	Plan Elements. Required for <u>all</u> PHAs completing this form.
B.1	Mission. State the PHA's mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA's jurisdiction for the next five years.
B.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.
B.3	Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.
B.4	Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.
C.	Other Document and/or Certification Requirements.
C.1	Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.
C.2	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.3	<p>Certification by State or Local Officials.</p> <p><i>Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.</i></p>
C.4	<p>Required Submission for HUD FO Review.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

D. Affirmatively Furthering Fair Housing (AFFH).

D.1

Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

N/A

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

N/A

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

N/A

Instructions for Preparation of Form HUD-50075-5Y - 5-Year PHA Plan for All PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR § 903.4)

A.1 Include the full PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/YYYY), Five-Year Period that the Plan covers, i.e. 2019-2023, PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. Plan Elements.

B.1 Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. (24 CFR § 903.6(a)(1))

B.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. (24 CFR § 903.6(b)(1))

B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. (24 CFR § 903.6(b)(2))

B.4 Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR § 903.6(a)(3)).

C. Other Document and/or Certification Requirements.

C.1 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32, REV 2.

C.2 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB have comments?

(b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR § 903.17(b), 24 CFR § 903.19)

C.3 Certification by State or Local Officials.

Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4 Required Submission for HUD FO Review.

Challenged Elements.

(a) Did the public challenge any elements of the Plan?

(b) If yes, include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

(Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D.; nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

MT001B.2 B.3 2025y

2024/2025 Goals and Objectives

HomeFront has continued with many transitions this year.

2024

Completed changes:

Staff:

- HomeFront reviewed Organizational Structure
- Re-Structure and reassignment of duties
- Created additional hybrid work opportunities for leadership
- Provided Extensive training for HOTMA
- HomeFront brought all employee positions up to the pay standards as evidenced in the most recent Salary Comparability Study.

Agency:

- HomeFront reviewed internal controls and processes to ensure we are good stewards of public funds.
- HomeFront continued to show accountability to Board with changes to information presented for monthly Board Meetings.
- HomeFront conducted administrative policy reviews with legal assistance.
- HomeFront continued its work on the priorities and goals identified in the Strategic Plan.
- HomeFront developed and maintained additional partnerships to create additional affordable housing.
- HomeFront applied for additional vouchers and waivers available that fit our capacity, the need of our community and that fulfill the mission of our agency.
- HomeFront is working closely with local officials to finalize a Housing Strategy for our Community.
- HomeFront continued its leadership role with CoC
- HomeFront continued its leadership role with the SAC
- HomeFront continued to expand its collaboration with community, state and regional partners
- HomeFront completed mural work that will include our values, staff poem and a QR code so anyone can access information about our agency 24/7/365.

Program:

- The Public Housing program finalized a review and re-write of the ACOP – Admissions and Continued Occupancy Policy.

- HomeFront continued to be a front door agency for the CoC and will engage clients through Service Point, a community wide HMIS system.
- HomeFront continued to be an active member of the local Coordinated Entry Team.

Development:

- HomeFront started re-development using the disposition proceeds, and other funding, to create additional housing that is less expensive to operate and maintain and will be more sustainable for the future.
 - o Laurel Gardens
 - o Re-Cycle and Re-Use project
 - o 3D Printed Housing
 - o Explore collaboration with community, state, and national partners.

Technology:

- HomeFront will continue to increase our employee use of technology to increase accountability and efficiency.
- HomeFront will explore converting to a new industry software suite.
- HomeFront will explore remote working opportunities, for any qualifying position, ensuring the needs of the agency and the community are met.

2025

Changes and Proposed changes:

Staff:

- 2 members of Leadership team will participate in Leadership Billings
- Create an internal GAP Analysis to determine additional/changed positions needed.
- HomeFront will re-onboard all employees.
- Staff and/or Leadership will participate in a retreat.
- HomeFront will have a 3rd party conduct a staff satisfaction survey.
- HomeFront will create a formal succession plan for all Leadership positions.

Agency:

- HomeFront will continue to review internal controls and processes to ensure we are good stewards of public funds.
- HomeFront will work to continue to show accountability to Board with changes to information presented for monthly Board Meetings.

- HomeFront will continue the process of establishing a training center for maintenance staff with the hopes of opening up these services to the School District students and a fee service to other property Managers in our community to train their maintenance staff.
- HomeFront will conduct administrative policy reviews with legal assistance.
- HomeFront will update the Strategic Plan.
- HomeFront will develop additional partnerships to create additional affordable housing.
- HomeFront will apply to become the CRO (Community Reinvestment Organization) to actuate HB 819.
- HomeFront will continue to apply for any additional vouchers available that fit our capacity, the need of our community and that fulfill the mission of our agency.
- HomeFront will work closely with local officials to finalize a Housing Strategy for our Community.
- HomeFront will continue its leadership role with State, Regional and National NAHRO.
- HomeFront will continue its leadership role with local and state wide CoC
- HomeFront will continue its leadership role with the SAC
- HomeFront will continue to expand its collaboration with community, state and regional partners
- HomeFront will have a 3rd party conduct a resident satisfaction survey.

Program:

- The HCV program will finalize a review and re-write of the Administrative Plan.
- HomeFront will continue to be a front door agency for the CoC and will engage clients through Service Point, a community wide HMIS system.
- HomeFront will continue to be a member of the local Coordinated Entry Team.
- HOTMA will be fully implemented throughout all HomeFront Affordable Housing Programs when mandated.
- NSPIRE will be implemented throughout all affordable Housing Programs.
- NSPIRE-V will be implemented throughout all HCV programs YY25.

Development:

- HomeFront will start re- development and development using the disposition proceeds, and other funding, to create additional housing that is less expensive to operate and maintain and will be more sustainable for the future.
 - o Project Base Vouchers in Mission Apartments
 - o Laurel Gardens Phase II
 - o Re-Cycle and Re-Use project

- o 3D Printed Housing
- o Permanent Supportive Housing
- o Artspace project
- o Explore collaboration with community, state, and national partners.

Technology:

- HomeFront will continue to increase our employee use of technology to increase accountability and efficiency.
- Homefront will invest in an HR portal to offer to employees from on boarding, benefits and termination.
- HomeFront will explore converting to a new industry software suite.
- HomeFront will continue to explore remote working opportunities, for any qualifying position, ensuring the needs of the agency and the community are met.

Attachment

MT001B.4 20255y

Violence Against Women Act (VAWA) Goals

The Housing Authority of Billings (HAB) has adopted a policy (the “HAB VAWA Policy”) to implement applicable provisions of the Violence Against Women Act.

HAB’s goals, objectives and policies to enable HAB to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault and stalking, as defined in VAWA, are stated in the HAB VAWA Policy, Notices of Occupancy Rights and Emergency Transfer Plans.

HAB shall operate programs to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault and stalking as and to the extent such programs are described from time to time in HAB’s Annual Public Housing Agency Plan.

Attachment

MT001C.1 2025y

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.

MT001C.2 20255y

RESIDENT ADVISORY BOARD MEETING

HOME FRONT PARTNERS (HOUSING AUTHORITY OF BILLINGS)

2415 1ST AVE NORTH, BILLINGS MT 59101

2/11/2025

STAFF:

Trina Swafford (HCV DIR)
Amber Uzelac (DIR of ASSETS)
Shauna Keirleiber (HCV FSS / Homeownership)
Leslie Peterson (HS)
Morgan Livingston (HS)
Patti Webster (CEO)
Jessica Moorehead (DIR OF OP)
Brittany Ellis (Asset Mgr)
Rhonda Mitchell (EXEC ASST)

RESIDENTS

Elizabeth Harris (PH)
Sarah Lesnet (PH)
Katee Mulkey (PH)
Anita Bearchum (PH)
Renee Gerwing (PH)
Braxton Gerwing (PH)
Amy Cowley (HCV)
Joesph Kines (HCV)
Sara Belgarde (HCV)
Justina Russaw (HCV)
RaeAnn Peltier (PH)

Trina Swafford administered the meeting and called the meeting to order at 12:05 pm by introducing herself and welcoming everyone in attendance.

Attendance was taken by Roster. Attendance included 9 staff members and 11 residents representing Section 8 and Public Housing. Swafford asked everyone in attendance to please introduce themselves and state their relationship to the meeting and what program they are a participant in. After everyone had the opportunity to provide an introduction, Swafford explained each year, we are required to submit an annual plan to provide updates on the progress of goals established the previous year and outline goals for the agency's future. Swafford explained that this meeting is in the middle of the current fiscal year and that changes and information discussed/ presented would represent the period of July 2024 – June 2025.

Swafford explained this meeting was an invitation to those invited to be part of a Resident Advisory Panel. Swafford explained the need for the panel, what the function of the Advisory panel is and how the panel can be involved in the formation of PHA programs and policies. She explained that though our agency doesn't facilitate the Resident Panel directly, the PHA is open to allow meeting to be held on the premises and providing the initial formation emails to provide limited contact information so the panel could coordinate a plan for moving forward. Swafford expressed hope the panel would continue to meet and provide feedback to HomeFront from a resident perspective through upcoming and ongoing opportunities.

Q: (Belgarde) expressed concern about that if the resident Panels' suggestions would be really listened to?

A: (Webster) expressed the commitment of the agency to be engaged and here the issues brought forward

A: (Swafford) Added that often the HUD guidelines might influence the ability for items to be addressed or changed as the panel might suggest, but the agency is willing to review and consider all items brought forward

Q: (Belgarde) expressed her appreciation for being given that opportunity

Swafford stated they would begin with the presentation of the HOMEFRONT Goals and Objectives for 2024/25 in each area of the Homefront Resident programs. Swafford explained that the Administrative Plans for the agency was available for

viewing both in our office and online on our website. This meeting and the subsequent meeting would be to discuss the 2024-2025 changes to the plan and to discuss the implementation of those changes.

Amber Uzelac presented the Public Housing changes. Uzelac presented the changes to the ACOP made, approved by the board, and implemented effective 1/1/2025. Uzelac explained that the ACOP was the governing document for the Public Housing program. It was explained that the document has extensive changes this year, increasing it to approx. 500 pages. Uzelac explained that major changes to the document were to adopt HUD-specific language or clarify HUD-specific language and directives in the document's language. Uzelac highlighted some of the changes to the program that directly affect the present residents. Items discussed:

- Amounts for rental fees and deposits were changed/increased based on FMR and other statistics. These included rent increases, pet waste fines being implemented, and changes to the program's Flat rent structure. Clarification was given regarding the 60-day notice provided to participants regarding these changes.
 - Q: *(Gerwing) Requested direction on how to convert to a flat rent structure*
 - A: *(Amber): Directed participant to her asset manager to discuss this option further*
 - Q: *(Harris) Voiced frustration regarding the pet waste situation at her specific residential location and the challenges it presents to her kids and a place to play safely.*
 - A: *(Amber) The resident was encouraged to discuss this in more detail with her asset manager, who encouraged her to bring specifics to their attention so it could be handled appropriately and in a timely manner.*
- Further clarification in the definition used for a "temporary absent adult" in Public Housing, specifically in regards to removal from household composition after 180 days
 - Q: *(Harris): discussed a HH specific scenario regarding HH members staying out of the house on weekends*
 - A: *(Uzelac) referred to the asset manager to discuss*
 - Q: *(Gerwing) asked how a removed member would be added to the HH?*
 - A: *(Uzelac) explained they would be added back into the household with proper verification of return*
- Changes made to using Program referrals implemented previously to the program. Homeless, Reunification and Domestic Violence referrals remain; changes were made in the allotted unit openings that would be filled through referrals every year to allow for even opportunities for all WL applications.
- Adoption of an alternate information gathering process used for verification when a new tenant lacks rental history.
 - Q: *(Belgarde) Commented, "Great that you do that, wow," and shared why this was a great addition and that it would have been helpful for herself when she lacked a previous rental history*
- Changes to the community service requirement + 30 hours and how this requirement is calculated and reported this change was on Hold currently, awaiting guidance from HUD
 - Q: *(Harris) Asked "if this was in addition to the hours required by the TANF program"*
 - A: *(Uzelac) Waiting for Guidance on this - more to come in regards to this requirement*
- Compliance with tiered repayment programs regarding unreported income: This program takes into account severity, amount, and frequency to comply with HUD Reporting processes.

Swafford presented the Housing Choice Voucher Administrative Plan changes. Swafford explained that the HCV program was currently in a rewrite phase due to upcoming HUD Program changes. HUD institutes the implementation date of the upcoming changes and explained that they would be communicated extensively prior to implementation.

- SEMAP scores shared and explained. Shared how they affect and calculate our PHA status, ranking, and overall performance.
 - No audit findings to report for the 2024 Audit completed in August 2024.

- Swafford explained Payment standards and FMRs. The changes adopted for 2024 included a waiver at 120% of Fair market rent (FMR). 2025 FMR and Payment standards would not be changed, and the SAFMRs would be removed.
 - Q: (Cowley) *Expressed an upcoming change to her rent. "Does that mean there will be no more money to help me with an increase in my rent?"*
 - A: (Swafford) *explained the assistance calculations and how the payment standard affects her subsidy*
 - A: (Webster) *Further clarified the portion the tenant pays versus HAP and how the gross rent of the unit in question affects her subsidy within the standards. Moving vouchers were discussed if the unit was out of her ability to pay once the increase was communicated to her.*
 - Q: (Harris) *Questioned if LEIAP was a countable source of income*
 - A: (Webster) *Explained that it was always in the tenant's best interest to report everything received and to allow our specialists to determine what is applicable. Webster shared that this can often be a source of trouble and cause non-compliance, so reporting everything is always the best course of action.*
 - Q: (Gerwing) *Shared she had always hesitated to look into using a voucher due to the stories she has heard about them losing them or expiring, or landlords not taking a voucher.*
 - Q: (Belgarde) *Shared her struggles with finding a HCV Landlord*
 - A:(Swafford) *Shared the agency efforts regarding landlord outreach, voucher extensions and our commitment to the education of the HCV program*
 - A: (Webster) *Communicated the common misconceptions of program participants and demonstrated this with a show of hands with the parties present. Participants had the same misconceptions regarding the families we serve. Those in attendance appeared surprised by the information.*
 - Q: (Russaw) *Explained an issue with her HCV rental and insect problem at her unit.*
 - A: (Swafford) *Provided direction on communicating this to the LL and HCV staff to get the situation researched and addressed promptly.*
 - Q: (Cowley) *"I heard that you could get an extra bedroom on my voucher for medical or emotional needs; how do I go about getting that?"*
 - A: (Swafford) *Explained that a reasonable accommodation may be requested in these circumstances and that it was important to discuss the particulars of this conversation privately. She was directed to the specialist for her voucher to discuss the matter further.*

Patti Webster updated the panel on items being developed through the Development Corporation channel of Homefront. Webster explained the complexity of the funding for these projects and the time it can take to get to the construction phase of a project is often longer than most realize. Upcoming items shared included:

- Recycle and Reuse project on Sioux Lane – LB Lofts
- 3D printed / Zero carbon- low Energy footprint project
- Recently named a Community Redevelopment Organization, which opens up opportunities for Home Ownership opportunities in the Billings area.
 - Q: (Belgarde) *"That is something I want to work towards in my personal journey"*
 - A: (Webster) *Explained that this was already an option at Homefront and directed her to Shauna to discuss our current Homeownership program and FSS programs.*
- Continued partnership with the CoC in Billings and our actions as a lead agent on permanent supportive housing projects are happening.
- HomeFront is always in pursuit of options for Affordable Housing. Explained the need for growth in our community has not kept up with the demand for housing, HomeFront is always on the search for opportunities that could be used in the future projects or opportunities to partner with other community resources to provide
- Swafford shared regarding the prospective partnership with Mission Apartments to utilize vouchers in the new units being rehabilitated at the restored Mission Building.

- Q: (Multiple parties) Comments on these projects being “ cool, neat, needed, and exciting”

Patti Webster discussed the development of Homefront staff and its search for ongoing opportunities, including promoting from within, training and the addition of additional staff positions as needed or when a position will benefit the community. Webster highlighted the addition of a Tenancy Support Specialist a few years ago. This position was added when it was identified we had a “Gap” in our ability to help. Explained the approach of Homefront is to come alongside, rather than just directing to a resource. The need for another of the same position has become apparent, and Homefront is looking into funding to add another Tenancy Support Specialist to our organization. Webster addressed that community support and advocacy can play an important role in being granted funds to create such positions and the advocacy of housing needs is more important than ever. Webster offered ways that those present can help, which included writing letters in support, communicating with their federal, state, and local representatives, and sharing their personal experiences. It is important so the needs of our community can be highlighted to our elected officials and local representatives.

Swafford communicated the next steps in the process for the Resident Advisory Panel. Those present who provided an email address would receive another email regarding others in attendance so that future communication amongst themselves can begin if the Panel so chooses.

Swafford explained that directly following this meeting would be a Public Hearing of the PHA Plan. This Meeting begins the 45-day comment period regarding the PHA Plan. This plan would be posted on the website for public review and comment.

Meeting was adjourned at 1:22 pm

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the X 5-Year and/or Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 7-1-25 in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

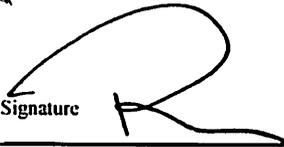
Housing Authority of Billings
 PHA Name

MT001
 PHA Number/HA Code

 Annual PHA Plan for Fiscal Year 20

 X 5-Year PHA Plan for Fiscal Years 2025 - 2029

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 Executive Director  Signature	Name Board Chairman <u>Tom Boos</u>  Signature
<u>3-26-25</u> Date	<u>3/26/25</u> Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.