

## **2025 Annual Plan Components**

<b>MT001AP2025</b>	<b>Annual Plan 50075-ST FY 2025</b>
<b>MT001a2025</b>	<b>Statement of Housing Needs and Strategy</b>
<b>MT001b2025</b>	<b>Financial Resources</b>
<b>MT001cPH2025</b>	<b>Policy Changes (PH)</b>
<b>MT001cS82025</b>	<b>Policy Changes (HCV)</b>
<b>MT001d2025</b>	<b>Goals and Objectives Progress</b>
<b>MT001e2025</b>	<b>Audit Findings</b>
<b>MT001f2025</b>	<b>HUD-50077-ST-HCV-SP</b>
<b>MT001g2025</b>	<b>Resident Advisory Board Consideration</b>
<b>MT001h2025</b>	<b>HUD-50077-SL</b>
<b>MT001i2025</b>	<b>Public Hearing Minutes</b>
<b>MT001j2025</b>	<b>Definition of Significant Amendment/Modification</b>
<b>MT001k2025</b>	<b>Cap Fund 5 Year Plan</b>
<b>MT001l2025</b>	<b>Deconcentration Plan</b>
<b>MT001m2025</b>	<b>Affidavit of Notices</b>

<b>Streamlined Annual PHA Plan</b> <i>(Small PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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**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, including changes to these policies, 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-SM is to be completed annually by **Small PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, HCV-Only PHA, or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** - A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

<b>A.</b>	<b>PHA Information.</b>								
<b>A.1</b>	PHA Name: <u>HomeFront</u> PHA Code: <u>MT001</u> PHA Type: <input checked="" type="checkbox"/> Small  PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>216</u> Number of Housing Choice Vouchers (HCVs) <u>803</u> Total Combined <u>1019</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission								
<p><b>Availability of Information.</b> 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 of 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 website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p>									
<p><b>How the public can access this PHA Plan:</b> All elements of the plan are available as: hardcopies are available upon request at HomeFront's lobby during business hours and a copy is linked on HomeFront's website homefrontpartners.org</p>									
<input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)									
Participating PHAs		PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	<table border="1"> <tr> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </table>	No. of Units in Each Program		PH	HCV
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PH	HCV								

<b>B.</b>	<p><b>Plan Elements Submitted with 5-Year PHA Plans.</b> Required elements for Small PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a Small PHA is not submitting its 5-Year Plan. See sub-section below for required elements in all other years (Years 1-4).</p>
<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b>                  (a) Have the following PHA Plan elements been revised by the PHA since its last <u>Five-Year PHA Plan</u> submission?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.  <input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.  <input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.  <input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.  <input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.  <input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.  <input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p> <p><b>Statement of Housing Needs and Strategy for Addressing Housing Needs.</b>                  Please see submitted attachment MT001a2025.  <b>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</b>                  Please see attached MT001cPH2025 and MT001cS82025 policy changes.  <b>Financial Resources.</b>                  Please see submitted MT001b2025.  <b>Rent Determination.</b>                  Please see submitted MT001cPH2025.  <b>Significant Amendment/Modification</b>                  Please see submitted MT001j2025.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p><b>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</b>                  Please see attached MT001i2025.;</p>
<b>B.2</b>	<p><b>New Activities.</b>                  (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.  <input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.  <input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.  <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.  <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.  <input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.  <input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.  <input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p><b>Hope VI or Choice Neighborhoods.</b>                  MT001 plans to consider making application for HOPE VI or Choice Neighborhoods if the opportunity arises and the agency is eligible.  <b>Mixed Finance Modernization or Development.</b>                  MT001 will consider all forms of development if the opportunity arises. We currently plan on utilizing project based vouchers in our LB Lofts project, consistent with our PHA Plan. We anticipate utilizing both HCV and VASH project Base vouchers in the development of 101 2 bedroom, 2 bath units located in the heights to complete the development of our subdivision. We will not utilize more than 25% of our 763 baseline.  <b>Project Based Vouchers.</b>                  We plan to utilize both HCV and VASH project based vouchers in new development of LB Lofts.  <b>Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</b>                  MT001 will consider applying for emergency/security/safety grants under Cap Fund and will also look at utilizing Capital Fund dollars for 2024, 2025 and 2026 in our conversion of public housing to PBV/Section 18 hybrid.</p>
<b>B.3</b>	<p><b>Progress Report.</b>                  Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.                  Please see submitted attachment labeled MT001a2025 Statement of Housing Needs and Strategy and MT001d2025 Goals and Objectives Progress.</p>
<b>B.4</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.                  Please see submitted attachment labeled MT001k2025 Cap Fund 5 year plan.</p>

<p><b>B.5</b></p>	<p><b>Most Recent Fiscal Year Audit.</b>                  (a) Were there any findings in the most recent FY Audit?                  Y <input type="checkbox"/> N <input checked="" type="checkbox"/>                  (b) If yes, please describe:</p>
<p><b>Plan Elements Submitted All Other Years (Years 1-4).</b> Required elements for all other fiscal years. This section does not need to be completed in years when a Small PHA is submitting its 5-Year PHA Plan.</p>	
<p><b>B.1</b></p>	<p><b>New Activities</b>                  (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?                  Y <input type="checkbox"/> N <input type="checkbox"/>  <input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.  <input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.  <input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.  <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.  <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.  <input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.  <input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.  <input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).                  (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process.                  (c) If using Project-Based Vouchers, provide the projected number of project-based units, general locations, and describe how project-basing would be consistent with the PHA Plan.                  (d) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
<p><b>B.2</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p>
<p><b>C Other Document or Certification Requirements for Annual Plan Submissions.</b> Required in all submission years.</p>	
<p><b>C.1</b></p>	<p><b>Resident Advisory Board (RAB) Comments.</b>                  (a) Did the RAB(s) have comments to the PHA Plan?                  Y <input checked="" type="checkbox"/> N <input type="checkbox"/>                  (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.                  Please see submitted attachment MT001g2025 Resident Advisory Board Consideration which includes the minutes from the meeting.</p>
<p><b>C.2</b></p>	<p><b>Certification by State or Local Officials.</b>                  Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>C.3</b></p>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b>                  Form HUD-50077-CRT-SM, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan</p>
<p><b>C.4</b></p>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.                  (a) Did the public challenge any elements of the Plan?                  Y <input type="checkbox"/> N <input checked="" type="checkbox"/>                  If yes, include Challenged Elements.</p>
<p><b>D. Affirmatively Furthering Fair Housing (AFFH).</b></p>	
<p><b>D.1</b></p>	<p><b>Affirmatively Furthering Fair Housing.</b>                  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.</p>

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 and Annual PHA Plan. 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.

Public reporting burden for this information collection is estimated to average 7.02 hours 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.

**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.

**Form identification:** MT001-HomeFront Form HUD-50075-SM (Form ID - 4111) printed by Rhonda Mitchell in HUD Secure Systems/Public Housing Portal at 05/12/2025 11:18AM EST

**Streamlined Annual  
PHA Plan  
(High Performer 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, including changes to these policies, 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-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
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A.	PHA Information.																										
A.1	<p>PHA Name: <u>Housing Authority of Billings</u> PHA Code: <u>MT001</u>            PHA Type: <input checked="" type="checkbox"/> High Performer            PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/01/2024</u>            PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)            Number of Public Housing (PH) Units <u>216</u> Number of Housing Choice Vouchers (HCVs) <u>763</u>            Total Combined <u>979</u>            PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> 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 of 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 website. 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> </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>B.</b>	<b>Plan Elements</b>
<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Annual PHA Plan</b> submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
<b>B.2</b>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
<b>B.3</b>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p>

B.4.	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p><i>date of the last 5 year was 2020</i></p>
B.5	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
C.1	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the 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 PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p><b>Certification by State or Local Officials.</b></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.3	<p><b>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><i>Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan.</i></p>
C.4	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</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>If yes, include Challenged Elements.</p>

<b>D.</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>						
<b>D.1</b>	<p>Affirmatively Furthering Fair Housing.</p> <p>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.</p> <table border="1" data-bbox="191 464 1466 915"> <tr> <td data-bbox="191 464 1466 506"><b>Fair Housing Goal:</b></td> </tr> <tr> <td data-bbox="191 506 1466 915"> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>N/A</p> </td> </tr> </table> <table border="1" data-bbox="191 940 1466 1356"> <tr> <td data-bbox="191 940 1466 982"><b>Fair Housing Goal:</b></td> </tr> <tr> <td data-bbox="191 982 1466 1356"> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>N/A</p> </td> </tr> </table> <table border="1" data-bbox="191 1381 1466 1829"> <tr> <td data-bbox="191 1381 1466 1423"><b>Fair Housing Goal:</b></td> </tr> <tr> <td data-bbox="191 1423 1466 1829"> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>N/A</p> </td> </tr> </table>	<b>Fair Housing Goal:</b>	<p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>N/A</p>	<b>Fair Housing Goal:</b>	<p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>N/A</p>	<b>Fair Housing Goal:</b>	<p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>N/A</p>
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# Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

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

**A.1** Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

## B. Plan Elements.

### B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

**Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions.** Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. 24 CFR §903.7(b) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. 24 CFR §903.7(b) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. 24 CFR §903.7(b)

**Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

**Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

**Homeownership Programs.** A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b)).

**Safety and Crime Prevention (VAWA).** A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

**Pet Policy.** Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

**Substantial Deviation.** PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

**Significant Amendment/Modification.** PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual 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-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#))

**B.2 New Activities.** If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark “yes” for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark “no.”

**HOPE VI.** 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD’s website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6). ([Notice PIH 2011-47](#))

**Mixed Finance Modernization or Development.** 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4)

**Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD’s website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). ([24 CFR §903.7\(h\)](#))

**Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. ([24 CFR §903.7\(j\)](#))

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

**Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. ([24 CFR §983.57\(b\)\(1\)](#)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.

**Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

**B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX.”

**B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

### C. Other Document and/or Certification Requirements

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark “yes,” submit the 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 §903.13\(c\)](#), [24 CFR §903.19](#))

**C.2 Certification by State of 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. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

**C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further

fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

**C.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must 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.**

**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 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.

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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 and Annual PHA Plan. 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.

Public reporting burden for this information collection is estimated to average 7.02 hours 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.

**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.

Attachment MT001a2025

Statement of Housing Needs and Strategy for Addressing Housing Needs:

The Billings area rental market after a pandemic became wholly unstable. Long-term renters have been priced out of their rentals with rising rents, had their homes sold out from under them to cash buyers, and the market rents climbed to an all-time high. The effects of the pandemic have greatly affected our community, as well as so many others.

HomeFront worked with MT NAHRO and the MT Department of Commerce to acuate an FMR study that backs up the fact that the FMRs issued by HUD annually are not keeping up with the rising gross rental costs in our metropolitan area.

HomeFront will consult with the City of Billings staff, using the Consolidated Plan and Impediments to Fair Housing Report as a guide, along with innovative and creative uses of funding sources, to best serve those in need; including applying for waivers to increase the payment standards for the Billings metro area, and will continuing to seek training and knowledge from all resources.

HomeFront will use its knowledge of the over 2000 families we serve daily, our understanding of the various populations in our community to best serve the 3,075 households residing on the Section 8 waiting list and the 5,175 families residing on the public housing waiting list.

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 increase the utilization of its HCV vouchers and rental inventory, by purchasing, building, developing and maintaining Public Housing, HOME, Section 8 new construction and tax credit units, which are modernized and are sought-after rentals.

We will strive to be high performers in both the Public Housing and Section 8 assessments.

We will work with various grant sources to employ one or more tenancy support specialists/Housing Navigators. We will also work with Montana Healthcare Foundation to bill medicaid for appropriate services.

The staff will be hired and 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, CHODOs, and other organizations to deliver affordable housing to our community; sole sourcing with existing CHODOs in our community for development.

HomeFront continues to streamline processes in the occupancy field, tenant and landlord communications, and financial needs through electronic systems assistance. We will continue to evaluate and utilize any waivers presented that will benefit our clientele.

HomeFront will update our 5 year strategic plan in the coming year.

We fully embrace that partnering with other municipal, private, and public agencies is a pathway to future successful development. HomeFront proudly continues to elevate the quality of life in our community by creating innovative, affordable, and sustainable neighborhood.

**Attachment****MT001b2025****Financial Resources****Anticipated Financial Changes for 2025**

	OCAF	Award or Annualized Amount	
<b>Operating Fund</b>		\$841,606	This Year's amount has been calculated but no official notice from HUD yet.
<b>Capital Fund</b>		\$788,773	2024 Capital Fund award, 2025 hasn't been awarded yet
<b>HCV Section 8</b>		\$5,209,990	Total award for 2025 has not been sent to the agency, reporting based on annualizing current receipts. Expected proration is 95%
<b>HCV Section 8 Admin Fee</b>		\$613,272	Expected Proration is 91%
<b>Mainstream 5</b>		\$278,906	Total award for 2024 has not been sent to the agency, reporting based on annualizing current receipts. Expected proration is 95%
<b>Mainstream 5 Admin Fee</b>		\$73,022	Expected Proration is 80%
<b>Pleasantview Subsidy</b>	\$1,081,440	\$578,758	OCAF effective October 1, 2024 \$1,081,440
<b>Laurel Gardens Subsidy</b>	\$230,028	\$83,274	OCAF effective June 1, 2024 \$230,028
<b>Rents for all programs</b>			Estimated based on subsidies when received unknown to date

**Attachment**

**MT001cPH2025**

**Policy revisions**

**7/1/2024 to 6/30/2025**

**Summary of Changes**

**2024 Admissions and Continued Occupancy Policy (ACOP)**

**Billings, Yellowstone County, Montana**

**Effective dates 7/1/2024 to 6/30/2025**

**Public Housing**

**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. (HAB Board Resolution #1244, effective 1/1/2025)**

**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. (HAB Board Resolution #1245, effective date 1/1/2025)**

**ACOP Update**

**Total Rewrite (HAB Board Resolution #1246, effective date 1/1/2025)**

**Attachment**

**MT001cS82025**

**Policy revisions**

**7/1/2023 to 6/30/2024**

**Summary of Changes**

**2024 Administrative Plan (HCV)**

**Billings, Yellowstone County, Montana**

**Effective dates 7/1/2023 to 6/30/2024**

**Summary of Changes incorporated into the Administrative Plan from 7/1/23 to 6/30/2024**

**PHA Plan: Resolution #1224, adoption of the 2024 PHA Annual Plan effective 3/27/24, signed 3/21/24**

**SEMAP: Resolution #1236, approving the SEMAP Scoring for FYE 2024, effective 8/17/23, signed 8/17/23**

**Payment Standards: Resolution #1221, approving the Payment Standards following grant of waiver for 120% FMRs and 50% Success rate SMFRs signed 2/29/24, effective date of 3/1/2024.**

## MT001d2025

### 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.

**MT001e2025**

**Audit Findings**

**MT001 has no audit findings of any kind and no concerns.**

**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 \_\_\_ 5-Year and/or X 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 7/1/24, 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 2025

5-Year PHA Plan for Fiscal Years 20\_\_ - 20\_\_

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		Name Board Chairman	
Signature	Date	Signature	Date

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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.

**MT001g2025**

**RESIDENT ADVISORY BOARD MEETING**

**HOME FRONT PARTNERS (HOUSING AUTHORITY OF BILLINGS)**

**2415 1<sup>ST</sup> 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)  
Joseph 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

**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 3/31/2024

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

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

certify that the 5-Year PHA Plan for fiscal years 2026-2030 and/or Annual PHA Plan for  
fiscal year 2025 of the Housing Authority of Billings, HomeFront is consistent with the  
*PHA Name*

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair  
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

**City of Billings, Montana**

*Local Jurisdiction Name*

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or  
State Consolidated Plan.

Provides for affordable housing, existing, new and rental assistance – all of which are affordable to  
the low-income population of our jurisdiction. HomeFront assists both with data and money for  
the City's Impediments to Fair Housing document. HomeFront consults with the City  
Consolidated Plan When addressing the need for additional housing and programs for the  
population it serves.

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: <u>William A. Cole</u>	Title: <u>Mayor</u>
Signature: <u>William A. Cole</u>	Date: <u>2-19-25</u>

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  
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ensure consistency with the consolidated plan or state consolidated plan.

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.

MT001i2025

PUBLIC HEARING FOR PHA PLAN

HOME FRONT PARTNERS (HOUSING AUTHORITY OF BILLINGS)

2415 1<sup>ST</sup> AVE NORTH, BILLINGS MT 59101

2/11/2025

STAFF:

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

RESIDENTS

Amy Cowley (HCV)  
Sarah Lesnet (PH)  
Katee Mulkey (HCV)  
Anita Bearchum (PH)  
Renee Gerwing (PH)  
Braxton Gerwing (PH)  
Georgina Denny (HCV)  
Joseph Kines (HCV)  
RaeAnn Peltier (PH)

Trina Swafford administered the meeting and called the meeting to order at 1:25pm by introducing herself and welcoming everyone in attendance. Attendance was taken by Roster. Attendance included 9 staff members and 9 residents representing Section 8 and Public Housing.

Swafford explained each year, we are required to submit an PHA Annual Plan to provide updates on the progress of goals established the previous year and outline goals for the agency's future. Swafford stated that this meeting is the official beginning of the 45-day public review and comment period for the PHA Plan for 2025 and required by HUD. The City of Billings and our Board have previously approved our PHA plan prior to this presentation. This Plan would be available for viewing and comment both in-person and on our website for the duration of the comment period.

Patti Webster provided access to the HOMEFRONT Goals and Objectives for 2025. Discussion on the document was encouraged. No discussion was requested, and all stated that it was understood. Webster highlighted the following:

- Successful audit completed in 2024 with no findings to report
- HR Portal Software for team members, currently in the input stages.
- Addition of a Team Member Panel to partner with the Homefront Leadership Team has been formed for 2025.
- Update provided on ongoing developments of LB Lofts, 3d printed housing, and other affordable housing initiatives.

Webster discussed that Homefront is a public agency with a board of directors that meets monthly. These meetings are open to the public and held on the last Wednesday of the month. The Chairman and Trustees of the board are appointed by the Mayor of Billings, and the board includes resident representatives. The Board advises on budget and policy matters within the organization. All other issues are handled within the defined roles of our organization and its program directors.

Swafford invited input and additional questions about the Changes and Proposed changes.

*Q: ( Cowley) Would Homefront consider allowing for unpaid parking, I can't afford to pay the meters on my limited income.*

*A: (Webster) Explained we are unable to direct the patterns of City parking downtown but offered to allow her to utilize her personal parking spot to alleviate the burden. Webster also highlighted the use of the designated Handicap parking within our parking lot to the east of the building.*

Webster shared that this coming year, in 2025, our agency will begin creating our next 5-year strategic plan. Attendees were encouraged to participate in this process and shared that more information will be forthcoming via our social media accounts and posted on our website on ways to get involved.

Amber Uzelac and Trina Swafford shared that this would be a year of many program changes, as HUD guidance is changing, and new program requirements will be implemented. Uzelac encouraged everyone to get involved when possible and assured those in attendance that all changes would be communicated effectively and efficiently as they took effect.

Webster invited questions and offered discussions regarding additional items, including questions regarding the current administration's transition of power.

Q: (Cowley) I wish they would increase the rental assistance amount

A: (Webster) The state of Montana has recently begun or completed a Fair Market Rent Study in Montana. These figures are used to determine FMRs that are used to create the Payment standards. The results of this study have not yet been released, but the extend of the study is completed within the funds allocated by federal appropriations. During this time of transition often the focus is elsewhere, but it is important to contact your elected officials and representatives to share your concerns.

Trina Swafford explained that several members of Homefront are involved in Advocacy organizations and campaigns to bring the discussion of housing to the forefront. In August of last year, Homefront took part in a campaign that communicated this to our current representatives. Swafford explained that Homefront hopes we will be able to do a similar campaign this year and invited the public to also participate in these efforts.

No additional questions or comments were presented.

Webster and Swafford thanked all who were in attendance for their participation.

The meeting was adjourned at 1:35 pm.

**Attachment**

**MT001j2025**

**Written Statement Defining Significant Amendment/Modification**

The PHA will consider an amendment a substantial deviation/modification if it proposes a project that changes the cost of the project more than fifty percent of the grant value. In addition, a proposed demolition, disposition, homeownership, RAD conversion, Capital Fund Financing, development, or mixed finance proposal is considered by HUD to be significant amendment to the CFP 5-year Action Plan.

Capital Fund Program - Five-Year Action Plan

Status: Approved

Approval Date: 03/24/2021

Approved By: STRANGE, LORI

Part I: Summary						
PHA Name : HomeFront		Locality (City/County & State)				
PHA Number: MT001		<input checked="" type="checkbox"/> Original 5-Year Plan		<input type="checkbox"/> Revised 5-Year Plan (Revision No: )		
A.	Development Number and Name	Work Statement for Year 1 2021	Work Statement for Year 2 2022	Work Statement for Year 3 2023	Work Statement for Year 4 2024	Work Statement for Year 5 2025
	BILLINGS (MT001000001)	\$709,369.00	\$901,320.00	\$835,084.00	\$567,100.00	\$557,000.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 2577-0274  
 02/28/2022

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year 1 2021</b>				
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
	BILLINGS (MT001000001)			\$709,369.00
ID0010	Cabinets and Countertops(Dwelling Unit-Interior (1480)-Kitchen Cabinets)	Replace cabinets and countertops MT 1-8		\$49,850.00
ID0001	Operations(Operations (1406))	Operations		\$164,130.00
ID0002	Management Improvements(Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training)	Rebranding. Maintenance Training Center		\$27,764.43
ID0003	Administration(Administration (1410)-Salaries)	Administration		\$65,652.00
ID0004	Exterior Carpet(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Landings and Railings)	Replace carpet on exterior stairs and landings MT1-3		\$19,105.70
ID0005	Appliances(Dwelling Unit-Interior (1480)-Appliances)	Stoves and Refrigerators MT 1-8		\$17,370.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 2577-0274  
 02/28/2022

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b> 1		2021		
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
ID0007	Combo Units(Dwelling Unit-Interior (1480)-Mechanical)	Water heater / Boiler units MT 1-8		\$127,820.00
ID0008	Carpet(Non-Dwelling Interior (1480)-Common Area Flooring)	Replace common hallway carpet MT 1-7		\$12,661.14
ID0028	Playground equipment(Dwelling Unit-Site Work (1480)-Playground Areas - Equipment)	Replace playground equipment and matting MT 1-5		\$114,607.86
ID0031	Playground Equipment(Dwelling Unit-Site Work (1480)-Playground Areas - Equipment)	Replace Playground Equipment and Matting MT 1-2		\$110,407.87
	Subtotal of Estimated Cost			\$709,369.00

Capital Fund Program - Five-Year Action Plan

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b> 2		2022		
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
	BILLINGS (MT001000001)			\$901,320.00
ID0009	Cabinets and Countertops(Dwelling Unit-Interior (1480)-Kitchen Cabinets)	Replace cabinets and countertops MT 1-7		\$85,000.00
ID0011	Operations(Operations (1406))	Operations		\$203,386.00
ID0012	Management Improvements(Management Improvement (1408)-Other,Management Improvement (1408)-System Improvements)	Computer software and hardware. John Deere tractor and attachments for snow removal		\$16,987.80
ID0013	Administration(Administration (1410)-Salaries)	Salaries		\$40,677.20
ID0014	Parking lot resurface(Dwelling Unit-Site Work (1480)-Seal Coat,Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving)	MT1-3 and 1-5 parking lots		\$50,000.00
ID0015	Refrigerators(Dwelling Unit-Interior (1480)-Appliances)	Replace refrigerators MT 1-6 and MT 1-8 (50)		\$28,800.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 2577-0274  
 02/28/2022

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b> 2		2022		
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
ID0016	Cabinets and Countertops(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Kitchen Cabinets)	Replace cabinets and countertops MT 1-6 (36 apartments)		\$165,000.00
ID0017	PTAC(Dwelling Unit-Interior (1480)-Mechanical)	Packaged Terminal Air Conditioner units MT 1-4 (20 apartments) 2 per unit		\$192,450.00
ID0036	Copy of Playground equipment(Dwelling Unit-Site Work (1480)-Playground Areas - Equipment)	Replace playground equipment and matting MT 1-5		\$47,253.00
ID0037	Copy of Playground Equipment(Dwelling Unit-Site Work (1480)-Playground Areas - Equipment)	Replace Playground Equipment and Matting MT 1-2		\$71,766.00
	Subtotal of Estimated Cost			\$901,320.00

Capital Fund Program - Five-Year Action Plan

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b>		<b>3</b>	<b>2023</b>	
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
	BILLINGS (MT001000001)			\$835,084.00
ID0006	PTAC Units(Dwelling Unit-Interior (1480)-Mechanical)	Packaged Terminal Air Conditioner MT 1-7		\$100,404.60
ID0018	Operations(Operations (1406))	Operations		\$208,771.00
ID0019	Administration(Administration (1410)-Salaries)	Salaries		\$83,508.40
ID0020	Cabinets and Countertops(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Kitchen Cabinets)	Replace kitchen cabinets and countertops MT 1-3 and MT 1-4 (56 units)		\$225,000.00
ID0021	Parking lot resurface(Dwelling Unit-Site Work (1480)-Seal Coat)	Parking lot resurface MT 1-8 lots		\$7,500.00
ID0022	PTAC(Dwelling Unit-Interior (1480)-Mechanical)	Packaged Terminal Air Conditioner units MT 1-6 (36 units) 2 per unit		\$209,900.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 2577-0274  
 02/28/2022

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b> 3		2023		
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
	Subtotal of Estimated Cost			\$835,084.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 2577-0274  
 02/28/2022

<b>Part II: Supporting Pages - Physical Needs Work Statements (s)</b>				
<b>Work Statement for Year</b> 4		2024		
<b>Identifier</b>	<b>Development Number/Name</b>	<b>General Description of Major Work Categories</b>	<b>Quantity</b>	<b>Estimated Cost</b>
	BILLINGS (MT001000001)			\$567,100.00
ID0023	Operations(Operations (1406))	Operations		\$126,400.00
ID0024	Administration(Administration (1410)-Salaries)	Salaries		\$63,200.00
ID0025	PTAC(Dwelling Unit-Interior (1480)-Mechanical)	Packaged Terminal Air Conditioners for MT 1-5 (40 units) 2 per		\$220,000.00
ID0026	Parking lot resurface(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving)	Resurface parking lots MT 1-4		\$7,500.00
ID0027	Cabinets and Countertops(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Kitchen Cabinets)	Replace cabinets and countertops MT 1-2 (40 units)		\$150,000.00
	Subtotal of Estimated Cost			\$567,100.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 2577-0274  
 02/28/2022

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	BILLINGS (MT001000001)			\$557,000.00
ID0029	Operations(Operations (1406))	Operations		\$126,400.00
ID0030	Administration(Administration (1410)-Salaries)	Salaries		\$63,200.00
ID0032	Cabinets and Countertops(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Kitchen Cabinets)	Replace cabinets and countertops MT 1-5 (40 units)		\$160,000.00
ID0033	PTAC(Dwelling Unit-Interior (1480)-Mechanical)	Packaged Terminal Air Conditioners MT 1-2 (40 units) 2 per		\$207,400.00
	Subtotal of Estimated Cost			\$557,000.00

**Advantages of Moving to Areas that are Not High Poverty Areas  
for Housing Choice Voucher Program Families:**

HUD feels Housing Choice Voucher Program vouchers “are ideal mechanisms” to broaden the housing choices for low-income families.

Since HUD feels families should be encouraged to seek housing opportunities that are outside of high-poverty areas, the Housing Authority of Billings has been asked to explain the advantages of locating housing in areas outside high-poverty census tracts during initial briefing sessions. A high-poverty census tract is a census tract in which at least 40% of the persons for whom poverty is determined to have incomes below the poverty level.

Advantages of locating housing in areas outside high-poverty census tracts include the following:

- Such areas generally have better schools, a lower crime rate, better public services and more shopping and other amenities.
- Data suggests that children of families moving from high poverty areas reach higher level of school achievement.

**Additional information:**

**Schools and Educational Opportunities**

**School District #2.** The main public school district is Billings School District #2 which enrolls approximately 16,000 students. It is the largest school district in the state of Montana. SD #2’s instructional programs encompass kindergarten through 12th grade, as well as adult education. There are 23 elementary schools, four middle schools, and three high schools. <https://www.billingschools.org>

**Private Schools**

**Billings Catholic Schools.** The Billings Catholic Schools serve nearly 1,000 students in grades K-12. These schools all operate under the Diocese of Great Falls-Billings and are supported in part by the seven Catholic parishes in the city. Billings Catholic Schools also offer pre-school, daycare, before school and after school daycare options. More details can be read at [www.billingscatholicschools.org](http://www.billingscatholicschools.org)

**Adelphi Christian Academy.** Adelphi Christian Academy offers schooling for students K-12. More information is available at [www.adelphichristian.com](http://www.adelphichristian.com).

**Higher Education Opportunities**

**Rocky Mountain College.** Rocky Mountain College is Montana’s oldest higher education institution. A private college, RMC offers more than 27 liberal arts and professionally oriented majors. For more information, log on to [www.rocky.edu](http://www.rocky.edu).

**Montana State University Billings.** Approximately 5,000 students attend MSU Billings which offers more than 100 degrees in a variety of disciplines. Examples include: arts and sciences, education, business, human services and technology. Classes at MSU Billings are offered during days and evenings to

accommodate traditional and non-traditional students. Grants, loans scholarship and work-study options are plentiful. MSU Billings offers one and two-year certificate programs, two and four-year degrees as well as Master's degree programs. Visit the campus on-line at [www.msubillings.edu](http://www.msubillings.edu).

**The University of Mary.** The University of Mary Billings Center offers working professionals the opportunity to achieve their educational goals by attending class in Billings just one night per week. There are both Bachelor's and Master's degree programs available. The University of Mary designed its accelerated programs to be the perfect fit for adult learners. For more information, call (406) 256-1738 or log on to [www.umary.edu](http://www.umary.edu).

**Montana State University – College of Technology.** The MSU Billings College of Technology offers training for many of today's high demand technological positions. The College of Technology focuses on degrees and licenses for nurses, surgical technicians, paramedics, firefighters, automobile technicians, diesel technicians, process plant operators, computer system technicians, computer desktop support specialists, and computer-assisted drafting technicians working with architects. These examples are just a few of the career possibilities for students earning Certificates, Associate of Applied Science degrees, Associate of Science degrees or Associate of Arts degrees from the College of Technology. Find out more at [www.msubillings.edu](http://www.msubillings.edu).

**Yellowstone Baptist College.** YBC is the only Southern Baptist College in the Northwest. The school was started in 1974 by the Yellowstone Southern Baptist Association. At YBC traditional and non-traditional students can engage in serious study of the Bible and related Christian subjects at the YBC. Log online to learn more: [www.yellowstonebaptist.edu](http://www.yellowstonebaptist.edu).

**Walla Walla University.** The WWU is based in Washington State but the Missoula Master of Social Work program was extended to Billings in 2001. This extension was important to WWU so the school could offer a program in Social Work education in the eastern half of the state of Montana. The WWU Billings campus phone number is (406) 254-9907.

### **Job Opportunities**

Job Service Montana is a one-stop source for job listings and other resources such as applications, disability resources, veteran services, education and training. Visit <https://montanaworks.gov/job-service-montana>

### **Transportation**

The Billings area is served by the MET bus transit service. Schedules and routes can be found at: <https://ci.billings.mt.us/259/MET-Transit> The area also has several local taxi services.

The Billings Logan International Airport is the regional air hub.

# Invoice



PO Box 130  
 Huntley, MT 59037  
 Phone # 406 348 2650

Date	Invoice #
1/31/2025	135643

Bill To
HomeFront 2415 First Ave. N. Billings, MT 59101

Email To
TAR@homefrontmt.org

Insertion Order. No.	Terms
	Net 30

Quantity	Description	Rate	Amount
1	Notice of Advisory Board Meeting, PHA Annual Plan, LEGAL ADVERTISING, First Insertion, 1/31	16.95	16.95
1	Notice of Advisory Board Meeting, PHA Annual Plan, LEGAL ADVERTISING, Second Insertion, 2/7	14.95	14.95

		<b>Total</b>	\$31.90
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Payment of this invoice is due within 30 days. Please be advised that a monthly late fee of 1.5% with a \$5.00 minimum will be charged on all overdue balances.

# Affidavit of Publication

STATE OF MONTANA

County of Yellowstone

Jonathan McNiven

Being duly sworn, deposes and says:

That he is the Legal Advertising Clerk of Yellowstone County News, a newspaper of general circulation published weekly in the town of Huntley, in the County of Yellowstone, State of Montana, and that the (1) Folio Legal, **Notice of Advisory Board Meeting**, a true copy of which is hereto **Included**, was published in said newspaper on the following dates:

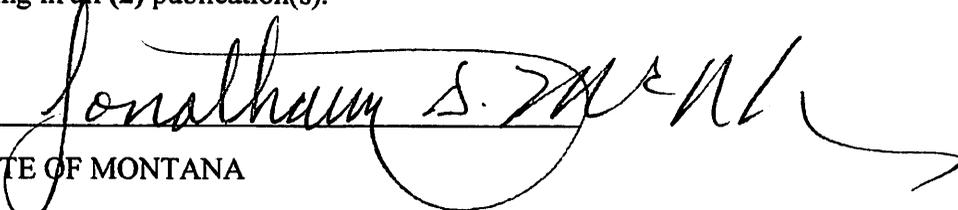
**January 31, 2025; February 7, 2025;**

making in all (2) publication(s).

### NOTICE OF ADVISORY BOARD MEETING

PHA Annual Plan  
HomeFront will hold a Resident Advisory Board meeting on its PHA Annual Plan submission to the Office of Public Housing, HUD on February 11, 2025 at noon. This meeting will be held at 2415 First Avenue North, Billings, MT 59101. All residents of HomeFront and the public are invited to provide input.  
A draft copy of the plan and attachments is available for review at the HomeFront website <http://homefrontpartners.org>. HomeFront is a Fair Housing Provider and an Equal Opportunity Provider.

1/31, 2/7 2025  
MNAXLP



STATE OF MONTANA

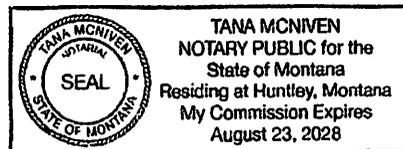
County of Yellowstone

On this 6<sup>th</sup> day of February 2025, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Jonathan McNiven, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed same.

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



Tana McNiven



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

My commission expires: August 23, 2028

# Invoice



PO Box 130  
 Huntley, MT 59037  
 Phone # 406 348 2650

Date	Invoice #
1/31/2025	135642

<b>Bill To</b>
HomeFront 2415 First Ave. N. Billings, MT 59101

<b>Email To</b>
TAR@homefrontmt.org

		Insertion Order. No.	Terms
			Net 30
Quantity	Description	Rate	Amount
1	Notice of Public Hearing, PHA Annual Plan, LEGAL ADVERTISING, First Insertion, 1/31	16.95	16.95
1	Notice of Public Hearing, PHA Annual Plan, LEGAL ADVERTISING, Second Insertion, 2/7	14.95	14.95
		<b>Total</b>	<b>\$31.90</b>

Payment of this invoice is due within 30 days. Please be advised that a monthly late fee of 1.5% with a \$5.00 minimum will be charged on all overdue balances.

# Affidavit of Publication

STATE OF MONTANA

County of Yellowstone

Jonathan McNiven

Being duly sworn, deposes and says:

That he is the Legal Advertising Clerk of Yellowstone County News, a newspaper of general circulation published weekly in the town of Huntley, in the County of Yellowstone, State of Montana, and that the (1) Folio Legal, **Notice of Public Hearing**, a true copy of which is hereto **Included**, was published in said newspaper on the following dates:

**January 31, 2025; February 7, 2025;**

making in all (2) publication(s).



STATE OF MONTANA

County of Yellowstone

On this 6<sup>th</sup> day of February 2025, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Jonathan McNiven, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed same.

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



Tana McNiven

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

My commission expires: August 23, 2028

## NOTICE OF PUBLIC HEARING

PHA Annual Plan  
HomeFront will hold a public hearing on its PHA Annual Plan submission to the Office of Public Housing, HUD on February 11, 2025 at 1:00 PM. This meeting will be held at 2415 First Avenue North, Billings, MT 59101. All residents of HomeFront and the general public are invited to provide input.

A draft copy of the plan and attachments is available for review at the HomeFront website <http://homefrontpartners.org>. HomeFront is a Fair Housing Provider and an Equal Opportunity Provider.

1/31, 2/7 2025  
MNAXLP

