Annual PHA Plan *(Standard PHAs and Troubled 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-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small 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 if administering both programs, or PHAS if only administering public housing.

(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, 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.

A. PHA Information.

A.1

PHA Name: Housing Authority of Billings **PHA Code**: MT001
PHA Type: ☒ Standard PHA ☐ Troubled PHA
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2024
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units ___216___ **Number of Housing Choice Vouchers (HCVs)** ____763____ **Total Combined Units/Vouchers** _____979_____
PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission

Availability of Information. 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. 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.

☐ **PHA Consortia**: (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	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B.	Plan Elements
B.1	**Revision of Existing PHA Plan Elements.** (a) Have the following PHA Plan elements been revised by the PHA? Y N ☐ ☒ Statement of Housing Needs and Strategy for Addressing Housing Needs ☒ ☐ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. ☐ ☒ Financial Resources. ☐ ☒ Rent Determination. ☐ ☒ Operation and Management. ☐ ☒ Grievance Procedures. ☐ ☒ Homeownership Programs. ☐ ☒ Community Service and Self-Sufficiency Programs. ☐ ☒ Safety and Crime Prevention. ☐ ☒ Pet Policy. ☐ ☒ Asset Management. ☐ ☒ Substantial Deviation. ☐ ☒ Significant Amendment/Modification (b) If the PHA answered yes for any element, describe the revisions for each revised element(s): **SEE ATTACHMENTS MT001cPH2024 and MT001cHCV2024** (c) The PHA must submit its Deconcentration Policy for Field Office review. **SEE ATTACHMENT MT001m2024 Deconcentration Plan**
B.2	**New Activities.** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N ☒ ☐ Hope VI or Choice Neighborhoods. ☒ ☐ Mixed Finance Modernization or Development. ☐ ☒ Demolition and/or Disposition. ☐ ☒ Designated Housing for Elderly and/or Disabled Families. ☐ ☒ Conversion of Public Housing to Tenant-Based Assistance. ☐ ☒ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ ☒ Occupancy by Over-Income Families. ☐ ☒ Occupancy by Police Officers. ☐ ☒ Non-Smoking Policies. ☒ ☐ Project-Based Vouchers. ☐ ☒ Units with Approved Vacancies for Modernization. ☒ ☐ 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. 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. **HomeFront is developing units that may or may not have mixed financing, applications for Choice Neighborhoods and other HUD/private/state funding. We intend to project-base upwards of 100 vouchers. This aligns with our plan for increasing voucher utilization and increasing the supply of housing units.**
B.3	**Progress Report.** Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. **See attachment MT001d2024**

B.4	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. **See attachment MT001l2024 Cap Fund 5 Year plan – approved by HUD 3/24/2021**
B.5	**Most Recent Fiscal Year Audit.** (a) Were there any findings in the most recent FY Audit? Y N ☒ ☐ (b) If yes, please describe: **See Attachment MT001e2024 Audit Findings 06 2023**
C.	**Other Document and/or Certification Requirements.**
C.1	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) have comments to the PHA Plan? Y N ☒ ☐ (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. **See Attachment MT001g2024 Resident Advisory Board Meeting – no decisions were made on recommendations, only questions answered and comments noted. Mostly program questions were asked related to HCV.**
C.2	**Certification by State or Local Officials.** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. **See attachment MT001h2024 HUD 50077 SL**
C.3	**Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** 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. **See attachment MT001f2024 ST-HCV-P**
C.4	**Challenged Elements.** 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 N ☐ ☒ If yes, include Challenged Elements.
C.5	**Troubled PHA.** (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A ☐ ☐ ☒ (b) If yes, please describe:

D.	**Affirmatively Furthering Fair Housing (AFFH).**

D.1 **Affirmatively Furthering Fair Housing (AFFH).**

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

Fair Housing Goal:
Describe fair housing strategies and actions to achieve the goal
NA

Fair Housing Goal:
Describe fair housing strategies and actions to achieve the goal
NA

Fair Housing Goal:

	Describe fair housing strategies and actions to achieve the goal **NA**

Instructions for Preparation of Form HUD-50075-ST
Annual PHA Plan for Standard and Troubled 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. All PHAs must complete this section.

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." (24 CFR §903.7)

☐ **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.** 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)) 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 maintain 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))

☐ **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

☐ **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

☐ **Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

☐ **Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

☐ **Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) 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))

☐ **Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

☐ **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 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 or Choice Neighborhoods. 1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

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 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

☐ **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. (24 CFR §903.7(h))

☐ **Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission, **5)** the number of units affected and; **6)** expiration date of the designation of any HUD approved plan. **Note**: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

☐ **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 Rental 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.

☐ **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b))

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b))

☐ **Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21 and Notice PIH-2017-03. (24 CFR §903.7(e))

☐ **Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. 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 (24 CFR §903.7(b)).

☐ **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).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

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.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

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

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

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 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 MT001a2024

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 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 2,534 households residing on the Section 8 waiting list and the 4,257 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.

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.

Through our re-branding and strategic plan process, HomeFront has developed more efficient ways to communicate with those we serve, community members, and our Board. With a dynamic website, vigorous social media presence, landlord portal, phone system, Board Portal and efficient communication and customer service are our priorities.

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 neighborhoods.

Attachment			
MT001b2024			
Financial Resources			
Anticipated Financial Changes for 2024			
	OCAF	Award or Annualized Amount	
Operating Fund		$1,029,082	This Year's amount has been calculated but no official notice from HUD yet.
Capital Fund		$837,714	2023 Capital Fund award, 2024 hasn't been awarded yet
HCV Section 8		$4,103,652	Total award for 2024 has not been sent to the agency, reporting based on annualizing current receipts. Expected proration is 95%
HCV Section 8 Admin Fee		$600,563	Expected Proration is 95%
Mainstream 5		$212,800	Total award for 2024 has not been sent to the agency, reporting based on annualizing current receipts. Expected proration is 95%
Mainstream 5 Admin Fee		$65,600	Expected Proration is 95%
Pleasantview Subsidy	$1,026,720	$532,660	OCAF effective October 1, 2023 $1,026,720
Laurel Gardens Subsidy	$230,028	$79,310	OCAF effective June 1, 2024 $230,028
Rents for all programs			Estimated based on subsidies when received unknown to date

Attachment

MT001c1

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 #1200, approving the 2023 PHA Plan effective 3/29/23, signed 3/29/23

SEMAP: Resolution #1207, approving the SEMAP Scoring for FYE 2023, effective 8/23/23, signed 8/23/23

Payment Standards: Resolution #1212, approving the Payment Standards following grant of continuance of waiver for 120% FMRs, signed 11/30/23, effective date of 1/1/2024.

Attachment

MT001c1

Policy revisions

7/1/2023 to 6/30/2024

Summary of Changes

2024 Admissions and Continued Occupancy Policy (ACOP)

Billings, Yellowstone County, Montana

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

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 #1214, effective 1/1/2024)**

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 #1214, effective date 1/1/2024)**

MT001d2024

Goals and Objectives 2024

Staff:

- HomeFront will re-onboard all employees.
- Staff and/or Leadership will participate in a retreat.
- HomeFront will review Organizational Structure

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 the 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 continue its work on the priorities and goals identified in the Strategic Plan.
- HomeFront will develop additional partnerships to create additional affordable housing.
- HomeFront will continue to apply for any additional vouchers available that fit our capacity, the needs of our community and that fulfill the mission of our agency.
- HomeFront will continue to work closely with local officials to finalize a Housing Strategy for our Community.
- HomeFront will continue its leadership role with CoC.
- HomeFront will continue its leadership role with the SA.C
- HomeFront will continue to expand its collaboration with community, state and regional partners
- The HCV program will work toward finalizing 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.

Development:

- HomeFront will start 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.
- Re-Cycle and Re-Use project will be finalized.
- 3D Printed Housing, the first of it's kind in Montana, will begin.
- HomeFront will continue to explore and develop 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, including on- boarding, benefits and separation.
- 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.

MT001e2024

Audit Findings

Finding 2023-001 Audit Adjustment
Significant Deficiency
Criteria – A good system of internal control contemplates an adequate system for timely identification, recording, and processing of entries to the financial statements within the Housing Authority's financial reporting system.
Condition – During the course of our engagement, we identified one significant audit adjustment that was not identified by management prior to providing the trial balance and supporting schedules to the audit team.
Cause – Housing Authority of Billings, Montana's internal control system did not identify one necessary adjustment prior to providing trial balances and supporting schedules to the audit team.
Effect – This deficiency could have resulted in a significant misstatement to the financial statements that was not prevented or detected and corrected by management.
Recommendation – We recommend a thorough review and reconciliation of the accounts, using accrual-based accounting, should take place as part of the financial closing process. This review should be done at both the accounting staff and supervisory levels.
Views of Responsible Officials – Management agrees with the finding.

Finding 2023-002 Department of Housing and Urban Development
CFDA #14.871
Section 8 Housing Choice Vouchers
Applicable Federal Award Number and Year – 2023
Special Tests and Provisions - HQS Enforcement
Significant Deficiency in Internal Control over Compliance
Criteria – For units under a HAP contract that fail to meet HQS requirements, the PHA must require the owner to correct life threatening HQS deficiencies within 24 hours after the inspection and all other HQS deficiencies within 30 calendar days or within a specified PHA-approved extension. If the landlord does not correct the cited HQS deficiencies within the specified correction period, the PHA must stop (abate) HAP payments beginning no later than the first of the month following the specified correction period or must terminate the HAP contract.
Condition – During our testing of compliance for HQS Enforcement, we identified 1 instance in which the landlord did not correct the cited HQS deficiencies within the specified correction period and the Housing Authority of Billings, Montana failed to abate the HAP payment timely.
Cause – The Housing Authority of Billings, Montana's internal controls related to the proper abating of HAP payments was not operating as designed.
Effect – A weakness in internal control over compliance resulted in the Housing Authority of Billings, Montana failing to abate the HAP payments to a landlord as required by HUD.
Questioned Costs – None reported.
Context/Sampling – A non-statistical sample of 33 failed inspections were selected for

testing. 1 out of the 33 failed inspections did not have the HAP payment abated timely.
Repeat Finding from Prior Year – No.
Recommendation – We recommend that the Housing Authority of Billings, Montana establish controls to ensure that HAP payments are abated timely.
Views of Responsible Officials – Management agrees with the finding.

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___ 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 _7/1/2023___, 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

__X___Annual PHA Plan for Fiscal Year 2024

_____ 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 Patti Webster	Name Board Chairman Thomas Boos
Signature Date	Signature Date

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

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

RESIDENT ADVISORY BOARD MEETING

HOME FRONT (HOUSING AUTHORITY OF BILLINGS)

2415 1ST AVE NORTH, BILLINGS MT 59101

2/14/2024

STAFF:		RESIDENTS
Trina Swafford (HCV DIR)	Shauna Keierleber (HCV LEAD)	Char Voise (HCV)
Amber Uzelac (ASSET MGR)	Alicia Stewart (HS)	Erick Field (MAIN)
Roxanne Olson (HCV LEAD)	Carrie Beuster (HS)	
Leslie Peterson (HS)		
Morgan Livingston (HS)		
Patti Webster (CEO)		

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

Attendance was taken by Roster and introductions were made. Attendance included 9 staff members and 2 residents representing Section 8. No attendees from Public Housing were present.

Swafford asked everyone in attendance to please introduce themselves and state their relationship to the meeting. 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 this meeting was an invitation to those invited to be part of a Resident panel that would hopefully continue to meet and provide feedback to HOMEFRONT from a resident perspective.

Swafford began with the presentation of the HOMEFRONT Goals and Objectives for 2024.

Swafford provided specific focus for upcoming projects for Development for 2024 include: Recycle and reuse project, 3D printed / Zero carbon- low Energy footprint project, and ongoing collaboration with State and Federal agencies. These projects were elaborated on in regards to the specifics of each by the CEO.

- Recycle / Reuse – "Man-camp" units from ND will be arriving on-site in the next several weeks.
- 3D project set to begin this Spring, will be first of its kind in MT.

Swafford explained that the meeting would now explain some of the specific changed within the programs administered by HOMEFRONT. Swafford explained the differences between HCV (formerly Section 8) and Public Housing.

Uzalec provided the following in regards to Public Housing

- Explained the utility costs are adjusted yearly
- Adjustments are made annually to the low-income standard.

Swafford provided the following update in regards to the HCV Program:

- Adjustments have been made the payment standards.
    - HUD sets these standards based on Fair Market Rent

    - HOMEFRONT HCV applied for a special waiver to increase this standard to 120% of the FMR for 2024, this was approved and is currently being utilized on our eligibility procedures.
    - This waiver was requested to helps budgets be more in line with the rental market in Billings
- 2023 Audit resulted in 2 findings: specifically related to inspections and file management. Offer further explanation if needed, declined by those present.

Swafford open up for discussion topics:

Erick Field (HCV) and Sharlene Voise (HCV) wanted to discuss the need for more Landlord involvement and the consistency of the HCV program on tenants in regards to the Landlord/Property Management interactions.

- Swafford clarified the LL vs HCV vs Tenant Triangle and the separation of those relationships.
- Swafford discussed HCV Screening vs Tenant Screening – different purposes exist and why.
- Swafford explained that Landlord engagement will be a main focus for the HCV program in the coming year, with increased resources and interaction with HOMEFRONT and Landlords/Property Managers.
- Swafford encouraged continued communication of these types of issues to ensure program consistency.
- Swafford communicated the strains for COVID, Rent Moratoriums, and the rental market and how these have affected the Landlord participation, but ensured this was something expected and anticipated by HOMEFRONT. Actions for increased waivers and funding options were utilized to the extent allowed.

Sharlene Voise shared her struggles with her move to Billings and HCV Household standards changes that existed in that process. Sharlene also posed questions regarding inspection continuity.

- Shauna K acknowledges the Challenges with her specific situation.
- Discussion was had regarding the HUD program requirements, the differences with other public agencies calculations or Program rules, differences in housing authorities and the Admin Plan allowances.
- Inspection requirements were discussed and the HQS/Nspire standards changes coming, who sets them and how they are addressed in regards to emergency and the correction.

Patti Webster posed a question to the attendees: "How Can We improve?" Discussion topic included:

- Be More Customer Service Friendly – closer attention to details, paperwork, and returning calls
- Waitlist Management was discussed, address corrections, Communication etc....
    - Uzelac shared the increase of Social Media presence
- Website not user Friendly
- Discussion of 3rd party brokers regarding vouchers

Other discussions had in regards to:

- Tenancy advocacy letters available with NAHRO website
- Elected officials and advocacy to make Housing a priority
- Lack of Affordable housing and HOMEFRONT efforts to combat in our community.

Meeting was adjourned at 1:45 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,** *Official's Name* **Honorable Mayor** *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _2020-2025 and/or Annual PHA Plan for fiscal year _2024_ 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: William A. Cole	Title: Mayor
Signature: William A. Cole	Date: 1-24-24

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 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.

PUBLIC HEARING FOR PHA PLAN

HOME FRONT (HOUSING AUTHORITY OF BILLINGS)

2415 1ST AVE NORTH, BILLINGS MT 59101

2/21/2024

STAFF:		PUBLIC:
Trina Swafford	Patti Webster	None in Attendance
Helen Verhasselt	Leslie Peterson	
Morgan Livingston	Roxanne Olson	
Shauna Keierleber		

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

Swafford stated that this meeting is the official beginning of the 45-day public review/comment period for the PHA Plan for FY 2024 and required by HUD.

Attendance was taken by Roster and introductions were made. Attendance included 7 staff members and no members of the public.

Swafford explained each year we're 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. The City of Billings has approved our PHA plan to match the City's program and business plan.

Swafford provided access to the HOMEFRONT Goals and Objectives for FY 2024. Discussion on the document was encouraged. No discussion was needed, as all stated it was understood.

Patti Webster, CEO wanted to ensure the following items are added to the document to be included in for 2024 Plan posted for public comment.

- HOMEFRONT will be doing Project-based HCV vouchers out of our tenant- based voucher Baseline.
- Affordable Housing Developments that are funded need deeper subsidy to be affordable under LITHC. HOMEFRONT will look to collaborate and partner with these developments to provide project-based vouchers in these units.

Swafford invited input and additional questions about the Changes and Proposed changes.
No questions were presented.

Meeting was adjourned at 12:20pm

Attachment

MT001j2024

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.

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

Capital Fund Program - Five-Year Action Plan

Status: Approved **Approval Date:** 03/24/2021 **Approved By:** STRANGE, LORI

Part I: Summary

PHA Name : HomeFront

PHA Number: MT001

Locality (City/County & State)

☒ **Original 5-Year Plan** ☐ **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

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 1 2021

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	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

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 1 2021

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
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

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 2 2022

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	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

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 2 2022

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
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

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 3 2023

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	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

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 3 2023

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Subtotal of Estimated Cost			$835,084.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 4 2024

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	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

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, suggesting that there are reasons to seek housing opportunities outside of high-poverty census tracts. A high-poverty census tract is a census tract (residential area) in which at least 40% of the persons for whom poverty is determined to have incomes below the poverty level. Some of these reasons are outlined below:

Some advantages of locating housing in areas outside high-poverty census tracts may 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

Public Schools

School District #2. The main public school district is Billings School District #2 which enrolls approximately 16,800 students. It is the largest school district in the state of Montana. School District #2's Instructional programs encompass kindergarten through 12th grade, as well as adult education. There are 22 elementary schools, 6 middle schools, and 4 high schools. Billingsschools.org

Private Schools

As of 2024 there are 14 private schools serving 1,836 students in Billings. Here are just a few:

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. billingscatholicschools.org

Billings Christian School is pre-K through 12th grade non-denominational Christian school. Billingschristian.org

Trinity Lutheran is Christ-centered education for K-8 and preschool. Trinitybillings.org

Trailhead Christian School is private, Christian school for Pre-K-8 grades. Trailheadchristianschool.org

71% of private schools in Billings are religiously affiliated.

Higher Education Opportunities

Rocky Mountain College. Rocky Mountain College is Montana's oldest higher education institution. A private college, RMC offers more than 50 liberal arts and professional majors. www.rocky.edu.

Montana State University Billings. MSUB is a public university, formerly Eastern Montana College. Offering 115 academic programs, through 5 colleges- Liberal Arts & Social Sciences, Business, Education, Health Professions and Science, and City College (college of technology). Musbillings.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. wvifw.umary.edu.

Montana Bible College. Offering Biblical Studies, Workplace ministry, LBC Degree program and a 1-year certificate, does not participate in Federal financial support. Montanabiblecollege.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. Socialwork-billings@wallawalla.edu

Rocky Vista University. Rocky Vista University (RVU) is a health-sciences institution of higher learning. Each campus is equipped with a simulation center, standardized patient rooms, expansive active learning classrooms, a full gross anatomy cadaver lab, a research lab, a large library, and many study spaces throughout the buildings. Rvu.edu

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. montanaworks.gov/iob-service-montana

Transportation

The Billings area is served by the MET bus transit service. Schedules and routes can be found at: ci.billings.mt.U5/259/MET-Transit

The area also has several local taxi services, Uber, Lyft

The Billings Logan International Airport is the regional air hub.

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:

February 2, 2024: February 9, 2024:

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 14, 2024 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

2/2, 2/9 2024
MNAXLP

Jonathan D McNiven

STATE OF MONTANA

County of Yellowstone

On this 9th day of February 2024, 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

Tana McNiven

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

My commission expires: August 23, 2024

TANA MCNIVEN NOTARIAL SEAL STATE OF MONTANA

TANA MCNIVEN
NOTARY PUBLIC for the
State of Montana
Residing at Huntley, Montana
My Commission Expires
August 23, 2024

Invoice

YELLOWSTONE COUNTY NEWS
"Weekly News, Local Views"

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

Date	Invoice #
2/2/2024	126921

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

Insertion Order. No.	Terms

Quantity	Description	Rate	Amount
1	Notice of Public Hearing. PHA Annual Plan. LEGAL ADVERTISING, First Insertion, 2/2	13.95	13.95
1	Notice of Public Hearing. PHA Annual Plan. LEGAL ADVERTISING. Second Insertion, 2/9	11.95	11.95

APPROVED FOR
PAYMENT $25.90, 4190.01.00 Puplications
PO # 2/20/24 ACCT # TB

1/2 Public Hsrg
1/2 Section 8

Received
FEB 15 2024
HomeFront

	Total	$25.90

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:

February 2, 2024; February 9, 2024;

making in all (2) publication(s).

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 21, 2024 at noon. 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

2/2, 2/9 2024
MNAXLP

STATE OF MONTANA

County of Yellowstone

On this 9th day of February 2024, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Jonathan McNiven, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed same.

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

Tana McNiven

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

My commission expires: August 23, 2024

TANA MCNIVEN NOTARIAL SEAL STATE OF MONTANA

TANA MCNIVEN
NOTARY PUBLIC for the
State of Montana
Residing at Huntley, Montana
My Commission Expires
August 23, 2024

Affidavit of Publication

STATE OF MONTANA

County of Yellowstone

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