



# **Affordable Housing Trust Fund**

## **Policies and Administrative Procedures**

Adopted: August 11, 2021

**Community Planning, Development & Innovation**

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# Introduction

No handbook can address every type of administrative/accounting situation that may arise during the course of the contract year; therefore, the City's Community Planning, Development & Innovation (CPDI) staff are available to respond to requests for clarification or additional information. In the event that new procedures or policies are implemented during the contract period, CPDI staff will provide timely notification and technical assistance. This manual is neither intended to be all-inclusive nor so restrictive that it cannot be amended.

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Missoula’s first comprehensive city-wide housing policy, A Place to Call Home: Meeting Missoula’s Housing Needs, was approved by City Council on June 24, 2019. The City’s fiscal year runs from July 1 through June 30 each year, placing the housing policy’s approval just before the beginning of Fiscal Year (FY) 2020 on July 1, 2019.

The development of A Place to Call Home relied heavily on community input, stakeholder participation, and active community partnerships. The implementation of the policy over the past year has relied on those active partnerships as well. The [Annual Missoula Housing Report](#) from The Missoula Organization of Realtors released each spring and the quarterly [Apartment Vacancy Report](#) from Sterling CRE provide valuable data on market trends.

The housing policy is guided by some of Missoula’s strongest values and shared principles:

- **Diversity:** A healthy housing market includes options and resources for all Missoulians.
- **Innovation:** A commitment to innovation will ensure that this housing policy is as dynamic as the community it aims to serve.
- **Collaboration:** Missoula’s housing policy relies on the collaborative spirit of this community and strong public-private partnerships.
- **Achievability:** While the goals of this housing policy are ambitious, they are also achievable. They reflect realistic projections of city resources and the opportunities we have at our disposal.

The policy attempts to both spur and harness the market to better provide housing at a wide range of entry points, and to ensure that all Missoulians can obtain safe and decent homes.

## Affordable Housing Trust Fund Overview

Recommended in the 2019 housing policy “A Place to Call Home,” Missoula’s Affordable Housing Trust Fund was established in July 2020. Its purpose as Missoula’s only local funding source for affordable homes is to provide a dedicated, flexible local funding source to support housing activities in Missoula and to provide the consistency and predictability that enable long-range planning, multi-year projects, and measured risk-taking in order to address the city’s severe housing needs. It is a revolving fund with a competitive application process intended to allow the leveraging of other outside resources and augment the need for annual fund-seeking from other federal and private sources.

## Affordable Housing Trust Fund Planning & Allocation Process

Funds will be disbursed on a City of Missoula Fiscal Year basis (July 1 – June 30). This allows applicants to leverage funding sources and coordinate programming as well as helping the city to maximize efficiency in administration of funds. Funds not awarded in the annual cycle may be available throughout the year, by invitation from city staff, for projects that cannot wait for the next competitive round of funding.

Below is an overview of the annual process for the Affordable Housing Trust Fund (AHTF). The annual process begins in fall of each fiscal year.



## Annual Housing Assessment Report

Each year, Community Planning, Development & Innovation (CPDI) (formerly the Offices of Housing and Community Development and Development Services) will produce a report tracking housing indicators, population statistics, and market information to guide annual priorities for the trust fund. This report will also include information about outcomes achieved in the prior year through trust fund investments.

## Community Feedback – Community Needs Assessment

Community Planning, Development & Innovation also gathers community feedback on housing goals and priorities each year through a Community Needs Assessment. This process typically involves community meetings and an online survey. We will continue to do this assessment, and the feedback collected from local residents will inform both the Trust Fund Annual Allocation Plan as well as the Annual Action Plan for HUD-Funded Programs.

## Annual Allocation Plan

Based on the information, feedback, and data collected through the housing assessment report and community needs assessment, the Affordable Housing Resident Oversight Committee and staff will produce an annual allocation plan setting goals for the upcoming fiscal year for trust fund investments. The allocation plan will clearly outline the revenue sources, funding priorities and restrictions for the upcoming grantmaking cycle. The Affordable Housing Resident Oversight Committee will draft and recommend the adoption of the final plan to the Mayor who will make the final approval determination.

## Annual Application Process

Once the annual goals for trust fund investments have been established through the annual allocation plan, staff will open a competitive application process for the trust fund.

The timing of the competitive funding cycle will align with other funding cycles administered from CPDI. An application workshop will be hosted in January of each year to open the application period, and outline the funding priorities set in the allocation plan and the application process and deadlines. Applicants are required to submit pre-applications; submissions will be reviewed, and those identified as viable and align with the priorities outlined in the annual allocation plan will be invited to submit a full application. Further instructions can be found in the application guidelines.

## Funding Decisions and Contracting

Funding recommendations will be made by the application review committee and CPDI staff. Grant agreements are initiated by the Affordable Housing Trust Fund Administrator and approved by the Deputy Director of the Community Development Division in CPDI. Approved grant agreements are routed to City Council and are signed by the Mayor.

The Affordable Housing Resident Oversight Committee will receive an update of funding decisions once contracts are approved by City Council.

## Types of Awards

Grants and loans will be made from the trust fund. Award terms will be determined on a per project basis and specified in the contract. Loans terms will be flexible, both short and long-term and interest rates will be set based on project needs.

## City Administrative Costs-Affordable Housing Trust Fund

Revenue from the trust fund can be used to pay costs incurred by the city associated directly with the administration of the Affordable Housing Trust Fund. Administration costs cannot exceed eight (8) percent of the amount of revenue received in the fund that year. Unspent administrative funds can rollover to the next fiscal year. Rollover funds are not included in the percentage of revenue calculation. All other administrative costs to operate the trust fund will come from the Community Planning, Development & Innovation general budget.

## Trust Fund Reserve Balance

The trust fund should maintain a minimum balance that will not be included in the annual award cycle in order to have resources to act quickly when there is an emergency, such as a need to cure a potential mortgage default that could result in loss of an affordable resource. The amount of the trust fund reserve balance will be determined by the Affordable Housing Resident Oversight Committee during the Annual Allocation Planning process.

## Definitions

**Accessory Dwelling Units (ADU):** A separate dwelling unit within a primary residence or a separate dwelling unit that occupies an accessory building that shares a parcel with a primary residence. As the name implies, accessory dwelling units are an accessory use to the principal use of the property.

**Agency:** A business or organization established to provide a particular service, typically one that involves organizing transactions between two other parties.

**Affordable Housing Development:** An affordable housing development is housing that is specifically set aside to be below market rate so lower-income community members can afford housing without being rent burdened. Some affordable housing developments may have maximum income caps, and/or collaborate with local service providers to house those who do not currently have housing.

**Area Median Income (AMI):** A statistic published annually by HUD. It is a midpoint of a county or state's income distribution by household size. [Learn more about AMI](#)

**Beneficiary:** A person or household that receives housing or another product as a result of an investment of the Affordable Housing Trust Fund.

**Building Permits and Fees:** City Planning & Development Services permit fees calculated from an adopted schedule. In Montana, these fees are calculated based on standards set at the state level. [Learn more about Building Permits and Fees](#)

**Community Development Block Grant (CDBG):** The Community Development Block Grant is a federally funded flexible program that provides communities with resources to address a wide range of housing and community development needs. [Learn more about CDBG](#)

**Developer:** Developers build structures in an area. They can be for profit or nonprofit entities. The city works with the developer to make sure they are in compliance with ordinances to foster development in alignment with other guiding plans.

**Expired-Use Affordable Housing:** Designated homes that are statutorily bound to be rented at specific affordability levels for a set period of time, for which that time period has expired. Typically constructed with Low Income Housing Tax Credits (LIHTC), HOME Investment Partnership Funds, or Community Development Block Grant Funds.

**Grants:** A sum of money that is awarded and is not paid back.

**HOME Investment Partnership Program (HOME):** The HOME Investment Partnerships Program (HOME) provides formula grants to states and localities that communities use - often in partnership with local nonprofit groups - to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to people with low incomes. [Learn more about the HOME Investment Partnership Program](#)

**Housing Affordability:** This term is often used broadly without clear definition. Under HUD rules, income-eligible households should pay no more than 30% of their income for gross housing costs, including utilities. Some HUD Programs provide subsidy to the household or the housing development to meet the 30% rule. The 30% rule is also a benchmark for national affordability. [The Housing and Transportation Index](#) (H+T Index), which provides a broader view of affordability that includes both the cost of housing and transportation combined, sets the benchmark at no more than 45% of household income.

**Housing First:** An approach that prioritizes providing permanent housing to people experiencing homelessness, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life. [Learn more about Housing First](#)

**Infrastructure:** Any basic physical structures, systems, and facilities needed for an affordable housing project.

**Loans:** A sum of money that is lent to a borrower and is paid back based on prearranged terms. Repayment terms typically include an agreed upon interest, a set percentage of money you pay on top of the loan, and a set period of time in which to pay the loan back within.

**Low-Income Housing Tax Credit (LIHTC):** A dollar-for-dollar tax credit in the United States for affordable housing investments. It gives incentives for the utilizations of private equity in the development of affordable housing aimed at low-income Americans. These tax credits are administered by the Board of Montana Housing. [Learn more about LIHTC](#)

**Match:** The dollar value of other resources committed to projects funded by the Affordable Housing Trust Fund. Each dollar committed to the project that is not generated from the trust fund shall be considered as match.

**Market Value:** The sales price of a building including land cost and real estate fees.

**Multi-dwelling Building:** Multi-dwelling Building A residential building containing three or more dwelling units (other than a 3+ townhouse multi-dwelling house) that share common walls and/or common floors/ceilings. Multi-dwelling buildings are typically served by one or more private or common building entrances.

**Naturally Occurring Affordable Housing:** Residential rental properties that maintain low rents without federal subsidy.

**Period of Affordability:** The length of time and the mechanism for which a housing resource will remain affordable.

**Preservation** (of housing): Housing preservation is an effort to keep the existing housing stock in a certain area. This may involve incentive programs to salvage lower quality (but still viable) housing stock.

**Recapture:** Recapture provisions allow the original homebuyer to sell the property to any willing buyer during the period of affordability, but allows the city to recapture all or a portion of assistance funds provided to the original buyer during the sale.

**Recipient:** An organization or entity that is awarded a grant or loan from the Affordable Housing Trust Fund.

**Re-Sale:** Re-Sale provisions ensure that if a property is sold during the period of affordability, it is sold to another home buyer within the Area Median Income (AMI) limit, and that the property is sold at a price that is affordable to a range of buyers within that AMI range.

**Retainage:** Is a portion of funds withheld until the completion of a project to ensure full completion of construction and reporting of outcomes.

**Subdivision:** In the classical sense, a subdivision is a plat of land, divided into lots. A plat is already a divided piece of land, and lots are created by dividing that land accordingly; hence, the name subdivision. Many people know subdivisions at their most developed points, when they have infrastructure, roads, and homes.

**Tax Increment Financing (TIF):** A form of public financing that collects future tax benefits for real estate subsidies or improvements to pay for current improvements/subsides. This method is used to spur development, stability and address blighted areas. Funding for TIF is often drawn from property taxes or sales tax. [Learn more about TIF](#)

# Affordable Housing Trust Fund Eligibility

## Alignment with City Plans & Priorities

Recipients of the Affordable Housing Trust Fund are expected to align with city plans and priorities that promote the values reflected in the Trust Fund Ordinance and Resolution, the administrative policies, and the function and design of the program.

Recipients of Affordable Housing Trust Fund investments are expected to address how their project design aligns with the following city plans and priorities in the application and annual reporting process, as applicable. Adherence to city plans and priorities will be considered on a specific project/program basis. For example, all programs are expected to speak to how they align to the Overall City Strategy and Growth Policy. Programs/Projects that intend to build, or rehabilitate housing should speak to their alignment of other relevant plans including but not limited to sustainability priorities, visitability, etc.

- [A Place to Call Home](#)
- [City of Missoula Strategic Plan](#)
- [Growth Policy](#)
- [Our Missoula Development Guide](#)
- [Climate Action:](#)
  - [100% Clean Electricity Resolution](#)
  - [Climate Ready Missoula](#)
- [Visitability Program](#)
- [Right of Way Vacation Policy; Chapter 12.04](#)
- [Annexation Policy](#)

## Neighborhood Engagement

Having affordable housing opportunities and engagement in all neighborhoods is a value of the adopted housing policy, a Place to Call Home and of the Affordable Housing Trust Fund "...no neighborhood should be asked to experience radical change. Consequently, no neighborhood should be exempt from change<sup>1</sup>." It is recommended that developers and organizations attend neighborhood council meetings, present their plans, make time and space for questions and answers, provide a feedback period for neighbors to express support and raise questions/concerns, share plans with CPDI to post on Engage Missoula, and use other strategies to engage neighbors in solutions. Neighborhood engagement will be assessed as a part of the application process.

Neighborhood Council information can be found [here](#).

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<sup>1</sup> (A Place To Call Home: Meeting Missoula's Housing Needs , 2019, p. 12)

## Climate Action Commitment

The City of Missoula, along with its partners, has several initiatives aimed at reducing Missoula's contribution to climate change and preparing for the effects of climate change, including the [100% Clean Electricity](#), [Climate Ready Missoula](#), and [Zero by Fifty](#) initiatives. The Affordable Housing Trust Fund is committed to ensuring its funding supports efforts like electrification of buildings, strong energy efficiency measures that are above code, solar ready homes, and deconstruction over demolition, and encourages recipients to implement these measures in funded projects.

## Organization Eligibility

Non-profit and for-profit organizations committed to producing affordable housing with trust fund investment are eligible to apply and receive funding.

## Household Eligibility

Eligible households vary per program funded by the trust fund. However, all eligible households must have a household income at or below 120 percent of Missoula Area Median Income. Household income will be certified at time of enrollment. A household's income can exceed the AMI limit of their unit while they are living there after they initially income-qualify.

Income limits will be published annually with the Unified Application materials.

## Developer/Organizational Capacity

To receive investment from the trust fund, the developer/organization must demonstrate the feasibility of the project and their experience and capacity to execute the project including professional development experience, reasonable financial strength, and the ability to undertake the proposed project. The developer/organization must demonstrate capacity in the following areas:

- a) the ability to obtain sufficient financing beyond what they are requesting from the Affordable Housing Trust Fund
- b) ability to manage the project successfully after completion or hire a professional management company with experience in managing affordable housing in compliance with AHTF requirements as applicable.
- c) current organizational financial statements
- d) development team qualifications and housing experience

## Resident Selection Process

Housing projects developed through the trust fund are required to create a resident selection plan, outlining how eligible residents will be selected. Resident selection plans should embrace Housing First principles as appropriate to the program and population served, seeking to screen in as many households as possible. Policies should be centered on consumer choice, self-determination and social and community integration. At a minimum all policies must follow the

Fair Housing Act, the Violence Against Women Act (VAWA) and Montana Residential Landlord and Tenant Act requirements.

Trust fund investment recipients may use a variety of approaches to fill units and are required to submit their selection plan to the City of Missoula prior to issuance of Certificate of Occupancy. The city reserves the right to request adjustments to the proposed selection plan.

Resident selection processes that create equitable access to housing will be given priority. A lottery allocation is one example of how a selection process might be done.

## Income Qualification Guidelines and Procedures

Recipients are required to income qualify every household they serve with trust fund investment. The specific process for income qualification will vary by project type and will be outlined in the contract documentation and Scope of Work. At a minimum, recipients are required to collect and document receipt of income verification at time of enrollment.

## Source of Income Discrimination Protection

Properties developed with trust fund investments are prohibited from discriminating against applicants for housing based on their sources of income. Applicants cannot be denied because of a Section 8 Voucher, a third-party supporting payment of their rent or informal income sources.

## Displacement/Relocation Protection and Assistance

The City of Missoula will take all reasonable steps to minimize displacement of tenants as a result of projects funded with investments from the trust fund. To this end, when displacement or relocation is an unavoidable component of a proposed project, the developer/organization must submit a relocation plan with their initial funding application. The relocation plan must address the following areas of how it will support existing tenants:

- **Identification of Community Liaison;** a central point of contact for tenants to speak with to answer questions and provide information about plans and opportunities to relocate and to communicate with the city and non-governmental organizations to coordinate provision of service or assistance
- **Notification of tenants;** written plan to give timely, sufficient and clear written notice of intent to change use of property
- **Compensation and reduction of financial hardships caused by the displacement or relocation;** plan to offer to support tenants financially, including but not limited to financial compensation to support relocation, foregoing rent for last months of a lease to allow tenants to accumulate funds to relocate, providing a stipend to defray costs, etc.
- **Potential priority placement in new units created;** identified or potential plans to offer newly constructed units to tenants that were displaced from original units

## Fair Housing

Recipients are required to maintain compliance with civil rights and fair housing laws.

The Fair Housing Act states that it is illegal to discriminate against any person because of race, color, religion, sex, disability, familial status, or national origin in:

- the sale or rental of housing or residential lots;
- advertising the sale or rental of housing;
- the financing of housing;
- the provision of real estate brokerage services; and
- the appraisal of housing.

Fair Housing legislation is clear in regard to discriminatory practices and penalties. The law does not intend to prohibit property owners, managers, and administrators from valid inquiries into an applicant's ability to meet lease requirements and/or program eligibility requirements as set forth in federal or state programs or in a Tenant Selection Criteria. However, there are certain areas that owners, managers, and administrators must clearly understand in regard to legitimate questions and disallowed inquiries. These are discussed below:

1. Independent Living - An owner, manager, or administrator should not attempt to assess whether an applicant is capable of independent living but only whether the applicant meets essential eligibility requirements. If an applicant requires supportive services but does not ask that they be provided, the need for supportive services should not be considered a factor in determining eligibility. If the provision of supportive services is part of the housing program, then these services should be provided in a non-discriminatory manner. However, no provider is required to take any action which would fundamentally alter the nature of the program in order to accommodate the disability of an applicant or tenant
2. Restriction of Children/Disability in Housing: Evacuation Safely - There can be no restriction as to where persons may reside in housing with the exception of federal or management priorities for certain adapted or accessible units. Accepting or rejecting applicants on the basis of the ability to evacuate safely is not allowed.
3. Legal and Illegal Questions - The Fair Housing Law clearly defines legal and illegal questions for all applicants of all housing in the United States. It is unlawful to make an inquiry to determine whether an applicant for a dwelling, a person intending to reside in that dwelling after it is sold, rented or made available, or any person associated with that person, has a disability or to make inquiry as to the nature or severity of a disability of such a person.

However, the following inquiries can be made, provided these inquiries are made to all applicants, whether or not they have disabilities:

- Inquiry into an applicant's ability to meet the requirements of ownership or tenancy;
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with disability or to persons with a particular type of disability;
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with disabilities or to persons with a particular type of disability;
- Inquiry to determine whether an applicant for a dwelling is currently using controlled substances;

- Inquiry to determine whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance.

A manager or owner is never required to make available a dwelling to an individual whose tenancy would constitute a direct threat to the health or safety of other individuals, or whose tenancy would result in substantial physical damage to the property of others.

All recipients are required to post a Fair Housing Opportunity poster and accessibility poster when applicable.



## **Affirmative Marketing & Sales Plans**

The Recipient will submit an Affirmative Marketing and sales plan, to be finalized prior to the sale of the first affordable unit, to address factors such as multiple-buyer management, marketing materials, responsibilities for marketing affordable homes, actions to be taken in the event of inability to identify qualified buyers, procedures for certification of buyer eligibility, purchase contracts, and full disclosures to buyers of their obligations and rights.

## **Affirmative Marketing Plan-Rentals**

The Recipient will submit an Affirmative Marketing plan to be finalized prior to the Certificate of Occupancy outlining their plan to affirmatively market the affordable units to eligible renters who would otherwise be least likely to know about the opportunity and/or apply.

Recipients are expected to create affirmative marketing materials, including flyers. A sample Affirmative Marketing & Sales Plan is provided as Appendix I. A sample flyer is provided as Appendix II.

## **Period of Affordability**

The City of Missoula will impose a period of affordability based on project type and level of investment. Depending on project specifics, this may be done as a deed restriction, land trust, ground lease or other method acceptable to the City. The period of affordability for down payment assistance programs will be determined by the program structure and will be negotiated into the contract on a case-by-case basis. The period of affordability will be protected by the appropriate legal documentation.

<b>AHTF Investment</b>	<b>Activity</b>	<b>Period of Affordability</b>
<\$30,000	<ul style="list-style-type: none"> <li>• Small repair loans</li> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• Mobile/Manufactured Home Preservation</li> </ul>	20 Years
\$30,001-\$100,000	<ul style="list-style-type: none"> <li>• Small repair loans</li> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• Mobile/Manufactured Home Preservation</li> </ul>	25 Years
\$100,001-\$400,000	<ul style="list-style-type: none"> <li>• Small repair loans</li> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• Mobile/Manufactured Home Preservation</li> </ul>	30 Years
\$400,001-\$1,000,000	<ul style="list-style-type: none"> <li>• Small repair loans</li> <li>• Acquisition</li> <li>• Rehabilitation</li> <li>• Mobile/Manufactured Home Preservation</li> <li>• All New Construction Projects</li> </ul>	35 Years
Any Level of Investment	<ul style="list-style-type: none"> <li>• Community Land Trusts</li> </ul>	75 Years

# Programs Supported by the Affordable Housing Trust Fund

## Consumer Housing Services Programs

### Objectives and Priorities

The goal of Consumer Housing Services Programs is to support new and existing community programs that help Missoulians reach their financial and home-buying goals, including (but not limited to):

- financial education programs;
- rental education programs;
- homeownership education programs;
- foreclosure counseling.

This includes supporting the network of programs and services in the community that prevent and end homelessness.

Projects and activities that are eligible to apply for funds under this project type include:

- Financial/Rental Education and Counseling
- Housing Education and Counseling
- Innovative Education and Counseling
- Community Land Trust Administrative Support
- Income Certification for City Programs
- Centralized Housing Solution Fund

### Eligible Households

Households of all income levels are eligible to enroll in Consumer Housing Service Programs.

## Construction of Homes

### The Rental Homes Program

The Rental Homes Program funds acquisition, construction, and rehabilitation of property to provide housing that serves low-income and moderate-income households, including seniors, people with disabilities, formerly houseless individuals and families, and people working for low wages.

## Objectives and Priorities

- Create new rental homes for Missoulians making below 60 percent of Area Median Income.
- Create new rental homes for Missoulians making below 80 percent of Area Median Income or less.
- Expand the type of homes available for low- and moderate-income Missoulians.
- Preserve and rehabilitate existing designated affordable rental homes in Missoula.

## Eligible Households

Households that participate in the Rental Homes Program must be at or below 80 percent of Missoula Area Median Income.

## Recapture, Resale and Repayment Provisions

Recapture, resale and repayment approaches are unique to the needs of each project and specificity will be negotiated into the contract.

## The Homeownership Program

### Objectives and Priorities

The Homeownership Program aims to create more affordable homeownership opportunities in Missoula. Trust fund investment can be used for acquisition, construction and rehabilitation of owner-occupied homes and down payment assistance loans.

## Eligible Households

Households that participate in Homeownership Programs must not currently be a homeowner, commit to live in the home as their primary residence and have a household income at or below 120 percent of the Area Median Income.

## Recapture, Resale and Repayment Provisions

Recapture, resale and repayment approaches are unique to the needs of each project and specificity will be negotiated into the contract.

## Preservation Program

The Preservation Program funds the acquisition of expiring affordable housing and/or preservation of affordable homes including:

- Small Repair Loans
- Multifamily Acquisition
- Mobile/Manufactured Home Preservation & Infrastructure Assistance
- Community Land Trusts

Preservation programs can support homeowners and renters.

## Small Repair Loans

### Objectives and Priorities

The goal of the Small Repair Loans Program is to support homeowners with making necessary improvements to their homes to preserve habitability and ensure preservation of affordable housing in the community.

### Eligible Households

Households that participate in the Small Repair Loans Program must be at or below 80 percent of Missoula Area Median Income.

## Multi-dwelling Acquisition

### Objectives and Priorities

The objective of Multi-dwelling Acquisition is to create new permanently affordable housing stock through the acquisition of existing multi-dwelling properties and making or preserving them as affordable options in the community. This can include LIHTC properties that are meeting their period of affordability and/or currently market-rate buildings that are for sale.

### Eligible Households

Multifamily Acquisition will serve households at or below 80 percent of Missoula Area Median Income.

## Mobile/Manufactured Home Preservation & Infrastructure Assistance

### Objectives and Priorities

The primary objective of the Mobile/Manufactured Home Preservation & Infrastructure Assistance Program is to support long-term residency for people who occupy mobile and manufactured homes. Whenever possible, finding opportunities to preserve naturally occurring affordable communities and transfer ownership to residents.

### Eligible Households

The Mobile/Manufactured Home Preservation & Infrastructure Assistance Program will serve households at or below 120 percent of Missoula Area Median Income.

Funds are to be used for preservation of mobile and manufactured homes as appropriate and infrastructure assistance to mobile home parks. Funds will be prioritized for Resident Owned Communities.

## Recapture, Resale and Repayment Provisions

Recapture, resale and repayment approaches are unique to the needs of each project and specificity will be negotiated into the contract.

## Community Land Trusts

### Objectives and Priorities

Community Land Trusts are an effective and critical strategy to preserving permanently affordable homes. Community Land Trusts will be eligible to use funds to build homes, purchase homes to convert them to affordable properties, to preserve existing affordable properties, operate rental housing, operate co-operatives or commercial properties, and administer their programs.

### Eligible Households

Community Land Trust programs must serve households at or below 120 percent of Missoula Area Median Income.

## Recapture, Resale and Repayment Provisions

Recapture, resale and repayment approaches are unique to the needs of each project and specificity will be negotiated into the contract.

## Accessory Dwelling Unit Program

### Objectives and Priorities

Accessory Dwelling Units (ADU) support the City's Focus Inward growth policy by utilizing existing land to expand housing availability with new development. The goal of this program is to promote use of the revised land use code and ADU regulations and create new affordable development through ADU construction.

This program supports organizations that seek to develop and administer ADU programs. A city administered program that will support individual residents seeking resources to develop and manage ADUs on their property is forthcoming.

### Eligible Beneficiaries

Eligible beneficiaries will be determined on a per project basis.

# Administrative Procedures

## Contracting

Prior to the release of trust fund dollars from the city, a written agreement must be executed with the award recipient. The agreement remains in effect during any period that the recipient is operating a program or implementing a program in which trust fund dollars are being invested.

The city will record a trust indenture for all acquisition, rehabilitation, or construction projects, which will stay in effect until project close-out, period of affordability, or longer as determined by the city.

## Pre-Contract Procedures

**Award of Funds** – The City Council reviews staff recommendations for awards to agencies and authorizes the Mayor to enter into contracts for the approved projects.

**City Environmental Record Review** – Environmental Record Review (ERR) needs will be addressed on a case by case basis. Recipients that have already completed an ERR for another agency or in another format may submit such documentation. The Trust Fund Administrator may recommend or require certain mitigation measures as a condition of funding.

## General Requirements

**Agency Formal Monitoring Visit** – During the course of the year the city may conduct a Program and Financial Performance Monitoring Visit. The purpose of the visit is to ensure recipient activities and households served were eligible and in compliance with the City's Annual Allocation Plan objectives and that other regulatory requirements were met.

**Agency Affirmative Action Requirements** – Recipients must agree to follow the City of Missoula's Non-Discrimination and Affirmative Action Policy. The City's Non-Discrimination and Affirmative Action Policy is provided in Appendix IV.

**Agency Taxpayer Identification Information Form/DUNS number** – A W-9 form is required by IRS regulations. A DUNS number is required and must be on file prior to payment request. Return this information to the Trust Fund Administrator.

**Board of Directors Representation** – When applicable to the structure of the organization, no member of the Board of Directors should have a dual role as a paid employee, agent or subcontractor.

**City Contract** – The written contract is the central part of the recipient agreement of the trust fund program. It presents a concise statement of rules of the Trust Fund, the conditions under which funds are provided and measures fiscal and program performance.

**City/Agency Procurement** – CPDI encourages recipients to outreach to and utilize Minority Business Enterprises (MBE) and Women Business Enterprises (WBE) whenever possible.

**Liability Insurance** – Recipients must, at their own expense, obtain and keep in force general commercial liability insurance to provide insurance against liability for loss, damage, or injury to property or persons that might arise out of the recipient’s activities. The City of Missoula shall have no liability with respect to any and all actions of the recipient’s officers, employees or agents, and as part of any grant or loan agreement the recipient shall agree to indemnify the City for claims for damages associated recipient’s activities.

**Match** –All projects and programs funded from the Affordable Housing Trust Fund must meet a 25 percent committed match threshold. Sources of match may include other project financing, federal Community Development Block Grants, federal HOME investment funds, Low-Income Housing Tax Credits (LIHTC) and owner equity. Financing and funding from other sources must be committed prior to the release of Affordable Housing Trust Fund investment.

In-kind donations of goods and/or professional services may be deemed as acceptable match provided that the recipient submits documentation to the satisfaction of CPDI that demonstrates: a) these costs would have been paid for with cash by the recipient to a third-party were it not for the in-kind donation, and b) these costs are reasonable and acceptable based on industry standards.

**Organizational Documents** – An entity needs to provide organizational documents that demonstrate capacity and authority to enter into agreements with the city.

**Preliminary Title Report and Insurance** – The city will require receipt of a Preliminary Title Report on the site to be encumbered due to the receipt of trust fund dollars prior to recordation of the trust indenture and prior to disbursement of any funds. The City may require Title Insurance from the recipient on the site in the amount of the trust fund dollars encumbering the property.

**Responsible Party Audit** – Recipients that conduct audits, should provide the agency’s most recent audited year including any management letters and any responses the agency has made to the audit. On an ongoing basis, agencies are required to submit their audit to CPDI within 180 days of the close of their fiscal year. If the agency is required to conduct a 2 CFR 200 single audit, that agency must submit their audit within nine months of the close of their fiscal year.

If an agency is not required to conduct an audit, that agency must submit their Form 990 and the financial statements of their most recent fiscal year approved and signed by a Board Officer.

**Workers’ Compensation** – Recipients must, at their own expense, obtain and keep in force any required workers’ compensation insurance. The City of Missoula is not the worker’s compensation insurer of the recipient’s employees. Recipient must have current workers’ compensation insurance in place for its employees where required by state law. The City of Missoula shall have no liability with respect to any and all actions of the recipient’s employees, officers or agents with regard to workers compensation.

# Fiscal Management & Recordkeeping

## Budget Types and Cost Categories

Budgets should be prepared in one of two general formats:

### 1. General Budgets

Three cost categories are within this budget type:

#### **Personnel Costs**

- 1) Personnel - Costs associated with the positions identified on the Staffing Plan. Costs should reflect the actual amount of time each position spends on the program.
- 2) Fringe Benefits - Eligible payroll-related costs of health insurance, retirement fund contributions, FICA, Worker's Compensation, and other payments made on the behalf of the employee.

#### **General Non-Personnel Costs**

- 1) Supplies - Consumable commodities that have a useful life of one year or less and valued under \$500, except for computer equipment, which must be inventoried and accounted for separately.
- 2) Communication - Costs of telephone, telephone installation, leasing of phone equipment, and postage.
- 3) Printing - Cost of copying and printing, whether done in-house or through an outside printer; supplies such as paper or fluids for copy machine owned or leased for program use.
- 4) Utilities - Costs associated with gas, electricity, water, and trash removal.
- 5) Rent - Rental charges for real property; office space for program.
- 6) Travel (local) - Costs for mileage reimbursement and conference expenses within Missoula County. Mileage reimbursement includes only travel by staff or volunteers for conducting the business of the recipient. No personal mileage will be reimbursed.
- 7) Travel (other) - All travel and conference expenses outside of Missoula County to employees and volunteers for actual mileage. Out of state travel requires prior city approval.
- 8) Insurance - Insurance-related costs required for the operation of the program.
- 9) Miscellaneous - For eligible expenses not noted above (should not exceed one percent of award).

10) Food/snacks – Eligible only for program participants, such as after refreshments for financial workshop. Please contact the Trust Fund Administrator for guidance.

### **Specific Non-Personnel Costs**

1) Equipment Rental - Costs for the rental of equipment, which is essential for the operation of the program.

2) Equipment Purchase - Purchase of equipment essential for the operation of the program in those instances where it is more cost effective to purchase equipment rather than rent it. This includes any item with a useful life of more than one year and a cost greater than \$500. Purchase of equipment requires prior city approval.

3) Contracted Services - Professional and technical services not performed by staff.

## **2. Development Budgets**

The cost categories associated with this budget type pertain to expenses identified with the financing, management, and construction of affordable housing projects.

Acquisition - cost associated with acquisition of land.

Demolition - cost associated with demolition of existing structures.

Closing Costs - fees, points, interest, or other costs to finance acquisition or construction.

Architecture and Engineering - fees and costs for professional design services to prepare plans and specifications.

Site Work - costs normally associated with preliminary site construction work: grading, underground utilities, soils report, and environmental remediation.

Fees and Permits - costs for design review, building, planning or other required permits.

Construction Management - consultant or other costs to provide construction management services.

Construction Contracts - all fees included in primary and subcontracts.

Consultants - all consultant fees including environmental testing or other specialty consultants.

Administration - overhead costs for administration by the applicant or other administrative costs.

Interest - interest paid on construction loans.

Legal - costs for legal services.

Financing costs - miscellaneous costs not included elsewhere but necessary to finance the development costs.

Taxes/Insurance - property or other taxes required for the property during the construction period and costs of all required construction insurance.

Marketing - costs associated with marketing the project and attaining rent-up and occupancy.

Operating Reserve - may be included for a specified period of time. Maximum operating reserve allowance to be determined.

Developer Fee - any fees or other charges due to the developer on completion of the project. The developer fee on affordable housing projects generally should not provide undue enrichment to the developer. Consult Trust Fund Administrator.

## **Activities and Expenditures**

A summary of City of Missoula policies related to Activities and Expenditures is provided below. All expenditures associated with an approved activity or program must comply with the following criteria:

### **1. Limitation of Expenditures**

The recipient shall not expend funds provided under the contract prior to the commencement of the contract or subsequent to the suspension or termination of the contract. Upon approval by the Trust Fund Administrator, expenses incurred starting July 1 are eligible for reimbursement.

Expenditures shall be made in alignment with the approved budget and shall meet the criteria established for allowable costs.

Expenditures shall be in direct support of the program that is the subject of the contract. The recipient shall notify the city in writing of any expenditure for items jointly used for any other program(s), and the expenditures shall be apportioned according to the percentage of direct use in the program.

### **2. Eligible Costs**

In order to be reimbursable, costs must be incurred for activities that are eligible under the applicable program-type. For example, costs for Trust Fund-funded projects must conform to these guidelines and projects that are joint funded by CDBG must additionally meet regulations under 24 CFR Part 570 for costs reimbursed. Further, costs for HOME-funded projects must conform to HOME program regulations at 24 CFR Part 92.

Furthermore, in order to be deemed eligible, any program cost must be included in the project budget in the signed written agreement awarding Trust Fund, CDBG or HOME funds between the city and the recipient.

### **3. Allowable and Unallowable Costs**

Examples of allowable costs include: salaries, materials and supplies, equipment and other capital expenditures and travel expenses.

Unallowable costs include entertainment and alcohol, legal defense, contributions, lobbying and fundraising. Stated unallowable costs cannot be paid by trust fund or federal reimbursement; however, a program could otherwise pay for unallowable costs with non-federal unrestricted funds.

The trust fund is following federal guidance on allowable and unallowable costs to ensure compliance for unified funding scenarios. Contact the Trust Fund Administrator to request an exception for an allowable cost.

#### 4. Allocable Costs

When trust fund investment is used as a part of a larger funding package, allocated costs to the appropriate source will be essential. A cost is allocable to a particular project or other cost objective if the goods or services involved are chargeable or assignable to that project or cost objective in accordance with relative benefits received. This standard is met if the cost:

- is incurred specifically for the funded project;
- benefits both the funded project and other work of the non-funded project and can be distributed in proportions that may be approximated using reasonable methods; and
- is necessary to the overall operation of the non-funded project and is assignable in part to the funded project in accordance with the principles in this section.

All activities that benefit from the non-funded project's indirect cost, including unallowable activities and donated services by the non-funded project or third parties, will receive an appropriate allocation of indirect costs.

If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, the costs may be allocated or transferred to benefitted projects on any reasonable documented basis. When the purchase of equipment or other capital asset is specifically authorized under a trust fund award for a particular purpose, the costs are assignable to the award regardless of how the equipment or capital asset would be used when no longer needed.

#### 5. Direct and Indirect Costs

Simply defined, direct costs are those costs that can be tied to a specific trust fund supported activity. Examples may include:

- Salaries for an employee that manages a trust fund supported activity
- Printing and postage for mailings specifically about trust fund supported activities

Indirect costs are those costs that cannot be tied only to a specific trust fund supported activity. Examples may include:

- salaries of Executive Director or other management that may oversee multiple programs, only some of which relate to trust fund supported activities
- rent
- the cost of equipment such as copiers or printers used for multiple programs

Project administration, or indirect costs cannot exceed fifteen (15) percent of the project total.

## 6. Ineligible Costs—General

Bad debts - any losses arising from uncollectible accounts and other claims, and related costs.

Contributions and donations.

Entertainment - costs of amusements, social activities and incidental costs such as meals, beverages, lodging and gratuities relating to entertainment, or any political or lobbying activity.

Fines and penalties - costs resulting from violations of or failure to comply with federal, state, and local laws and regulations.

Interest and other financial costs - interest on borrowings (however represented), bond discounts, , and legal and professional fees paid in connection therewith.

Membership expenses - costs of membership in any organization, which devotes a substantial part of its activities to influencing legislation.

## Reimbursements

### General Programs and Public Services

Requests for reimbursement for eligible expenses shall be submitted in a timely manner. A Request for Funds must be submitted on city forms, and must be signed by two authorized representatives of the funding Recipient. Reimbursement requests received, in most cases, will be paid within 30 days. Proper documentation – including proof of payment, time allocations, payroll records, or other required materials – must be submitted with all requests for reimbursement.

The Trust Fund Administrator will review each request for reimbursement submitted by the recipient. Questionable or ineligible expenses will be identified, and clarifications, corrections, and/or additional information will be requested.

### Retainage

CPDI may elect to withhold up to ten percent of the grant award until we are satisfied with all outcome reporting and closeout requirements.

## Request for Funds Form

The Request for Funds form, provided by CPDI, itemizes your grant expenses by city account number. The total on this form should equal the total on the general ledger or accounts payable list for all AHTF expenses.

It is the recipient's responsibility to redact any personal, confidential information of beneficiaries served, such as social security numbers, from draw requests.

**The recipient should mail or email the original reimbursement form** with accompanying copies to justify expenses to the City of Missoula.

The mailing address is:

City of Missoula  
Community Planning, Development & Innovation  
435 Ryman  
Missoula, MT 59802  
[harris-shearse@ci.missoula.mt.us](mailto:harris-shearse@ci.missoula.mt.us)

While CPDI strives to process all reimbursement requests in a timely manner, it may take up to thirty (30) days to process.

# Monitoring and Documentation

## Monitoring Reviews

The City of Missoula is responsible for ensuring that recipients comply with all regulations and requirements governing their administrative, financial, and programmatic operations of the Affordable Housing Trust Fund. This includes assuring that performance goals are achieved within the scheduled time frame, budget and when necessary taking appropriate actions when performance problems arise. Monitoring is an ongoing process throughout the cycle of award.

### **The five steps of the formal monitoring visit include:**

1. Notification Letter - Explains the purpose of the visit, confirms date, scope of monitoring and outlines the information that will be needed to conduct the review.
2. Entrance Conference - Introduces monitoring visit purpose, scope and schedule.
3. Documentation and Data Gathering - The City will review and collect data and document conversations held with staff, which will serve as the basis for conclusions drawn from the visit.
4. Exit Conference - At the end of the visit, the City will meet again with the key agency representatives to present preliminary results, provide an opportunity for the agency to correct misconceptions and report any corrective actions already in the works.
5. Follow-Up Letter - The City will send a formal written notification of the results of the monitoring visit addressing highlighting successes and addressing areas to change or correct. The agency will be required to respond in writing to any problems or concerns noted.

## Monitoring Process

### Purpose

The AHTF Administrator will lead a monitoring process in order to review the programmatic and financial aspects of the recipient's activities. Draw requests and quarterly reports submitted by the recipient will be reviewed for Administrative Policy and grant document compliance.

The monitoring process is oriented towards elevating strengths, resolving problems, offering technical assistance, and promoting timely implementation of programs. To this end, CPDI staff may require corrective actions of the recipient. Following are examples of significant problems, which will trigger corrective action by the recipient:

- Services are not documented
- Goals are not met
- Program files are not in order
- Complaints by beneficiaries
- Non-compliance with AHTF Administrative Policies

- Use of AHTF funds for ineligible expenses
- Required reports are not submitted in a timely manner

## Monitoring Plan

The Trust Fund Administrator will develop the monitoring schedule annually. At least 25 percent of active projects will be monitored each fiscal year. A risk analysis tool will be used to determine which projects are prioritized for monitoring. Monitoring will take various forms ranging from desk reviews to on-site monitoring visits.

## On-Site Visits

The Trust Fund Administrator may conduct on-site visits with all recipients, even for those with strong past performance.

Based on monitoring results, city CPDI staff may hold discussions with recipients whose performance does not appear to be sufficient to meet the goals and achievements as outlined in the agreement. An on-site visit may occur to discuss the service activity shortfall.

On-site monitoring visits may be conducted to ascertain that eligible clients for whom the program was intended are being served and that in the event of an audit, the required client information is being maintained.

## Intervention and Sanctions

The Trust Fund Administrator will work collaboratively with the recipient to ensure that problem areas are corrected. Every effort will be made to work with the recipient to find solutions. However, agencies will be held accountable for the performance standards outlined in the recipient contract and this manual. The city will use three increasingly serious stages to identify and address recipient problem areas:

### Stage One – Early Intervention

The city may plan a strategy with the recipient and provide training and technical assistance and more frequent and thorough reporting and monitoring reviews.

### Stage Two - Intervention (More Serious or Persistent Problems)

The city may restrict payment requests, disallow expenses, require repayment, or impose probationary status.

### Stage Three - Sanctions

The city may temporarily suspend the recipient from participation in the program, not renew the agency's contract for next program year, terminate the contract or initiate legal action.

## Enrolled Household Documentation by Recipient

### Required Documentation

Recipients are required to maintain a record for every enrolled household for the duration of the agreement. The household record should include names of all members who live in the unit and the following information:

- Gender
- Ethnicity/race
- Household type
- Income for adults in household

This information should be submitted with the recipient's draw requests and/or quarterly reports, as appropriate.

### Project Outcome Reporting

All projects or programs funded by the AHTF must report on outcomes quarterly. Reports are due 30 days after the close of each quarter during the program year, typically in October, January and April. A final report is due 30 days after the program year, typically in July. The report includes financial reporting as well as a narrative detailing progress made in relation to the goals and performance indicators outlined in the contract Scope of Work.

## Programmatic Close-Out

Programmatic close-out will consist of, but will not be limited to the following:

1. Review and verification of annual household statistical and narrative report due 30 days after the end of the program year.
2. Review of Recipient records, including, but not limited to:
  - a. activity documentation
  - b. personnel files
  - c. inventory control files
  - d. evaluation of activity and program accomplishments.

For housing development activities, project close-out will only occur when units supported by AHTF funds are leased or sold to 80 percent of eligible income qualified households. A Certificate of Occupancy must also be provided to CPDI. CPDI will remit to the recipient the 10 percent retainage of funds only after this task is completed.

## Financial Close-Out

Financial close-out will consist of, but will not be limited to the following:

1. review and verification of information submitted in the final drawdown request
2. review of recipient records:

- a. accounting records and ledgers
  - b. source documentation (invoices, time cards, canceled checks, etc.)
  - c. budget documentation (modifications, etc.)
  - d. equipment purchases
3. evaluation of activity financial accomplishment

## **Construction Project Close Out**

At completion of construction, agency is required to submit to the Trust Fund Administrator a copy of the Certificate of Occupancy, provided by CPDI, prior to final disbursement of funds.

## **Retainage**

Retainage won't be released until the final project close-outreport has been submitted by the Recipient. Reports will be reviewed within 15 days of receipt.

## **City Internal Audit Reviews**

The City reserves the right to review all recipient records and transactions. Findings that result in repayment must be reconciled with non-federal funding sources. Failure of the recipient to rectify audit findings related to their project within the time frame specified in any notice may result in the City determining the grant or loan agreement to be in default, termination of grant agreement, and/or disbarment from future grant funding.

If requested by the City, the recipient must comply with informational requests for their audits/990s within 30 days of the request.

# Appendices

# Appendix I

## Community Planning, Development & Innovation Sales & Affirmative Marketing Plan



**Part One- Sales Plan:** The following outlines the strategies for identifying qualified buyers for dedicated affordable units. The Sales Plan will outline the delineation of roles between the City of Missoula Community Planning, Development & Innovation (CPDI) and [Organization] and the process to qualify homebuyers for dedicated units.

**Eligible Buyers:**

A household earning up to 120 percent of Area Median Income is initially eligible to purchase an affordable unit within this project.

Unit Type	Studio	1 Bedroom
*Maximum Sales Price	\$215,121	\$243,138

\*Maximum sales prices at first point of sale. Future maximum sales price will be calculated by Community Planning, Development & Innovation (CPDI) or their agent prior to listing and subsequent sale.

**Certifying Qualified Buyers:**

Interested buyers will submit a pre-application to CPDI with financial documentation, demonstrating income eligibility. Households who income qualify will be entered into a lottery. Households will be selected at random from the lottery within [timeframe] prior to Certificate of Occupancy. CPDI will manage the lottery list and share communications on behalf of the developer at agreed upon intervals. Households must be re-certified by CPDI prior to signing the sales contract.

**Sales Contract:**

Within three (3) business days of after execution of the sales contract, the developer or sales agent must transmit a copy of the sales contract to the City or the City's Agent.

**Disclosures:**

CPDI will provide the buyers with disclosures of their obligations and rights at the time of lottery selection.

**Actions in the event of inability to identify qualified buyers:**

In the event that qualified buyers are not identified, CPDI and the developers will take the following actions:

**Review and Update:** By signing this form, the applicant agrees to follow the outlined Sales Plan and provide updates as needed within the life of the developer agreement.

Signature:	Date:
Name & Title (type of print):	

**Part Two- Affirmative Marketing Plan:** The following outlines the intended strategy to affirmatively market the dedicated affordable units at the Reed to households earning up to 120 percent of Area Median Income, as referenced above. Affirmatively marketing means to conducts both broad and targeted outreach efforts to reach qualified buyers. The Affirmative Marketing Plan is intended to create concrete strategies to reach people who meet the home buying criteria but without direct outreach are **least likely to hear about the opportunity or apply**. The Affirmative Marketing Plan complements the above Sales plan in that it communicates the availability and the process to people who people who are eligible and may be unfamiliar with the steps to take to qualify.

**Section 1: Project Details**

Project Name:	
Project Address:	
Project Lead:	
Project Lead Phone:	
Project Lead Email:	

**Section 2: Affirmative Marketing Plan**

**Community Planning, Development & Innovation  
Sales & Affirmative Marketing Plan**



Marketing Lead:	
Marketing Lead Phone:	
Marketing Lead Email:	

Approximate Start Date of advertising (mm/dd/yy):	
---	--

Target Market Area/Neighborhood(s):	
-------------------------------------	--

Has your staff received Fair Housing Training in the last 24 months?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	If no, please provide a brief explanation and any plans to provide Fair Housing training to staff: _____ _____

**Section 3: Direction of Marketing Activity:** Indicate which group(s) in the Missoula area are least likely to apply for the housing/service because of its location and other factors **without special outreach efforts**.

White	Source of Income
Native American or Indigenous	LGBTQ+
Black or African American	Sex/Gender/Gender Identity
Hispanic or Latinx	Other:
Asian	Other:
Persons with Disabilities	Other:
Families with Children	Other:
Age	Other:

**Section 4: Marketing Plan: Commercial Media** Select the type of media, if any to be used to advertise the availability of this program/housing/service to the target group(s) identified in Section 3.

<input type="checkbox"/> Newspapers/Publication	<input type="checkbox"/> Radio	<input type="checkbox"/> TV/Billboards	<input type="checkbox"/> Email/Website	<input type="checkbox"/> Other (Specify)
---	--------------------------------	--	--	--

\*provide a separate list of commercial media to be used in your marketing campaign to the mainstream/general population

**Description of other commercial media plans:**

---

Name of Newspaper, Radio, TV Station or Website	Mainstream or Target Group	Group Identification of Readers/Audience	Size/Duration of Advertising

**Marketing Plan: Brochures & Signs**

Will brochures, letters, flyers or handouts be used to advertise? Yes \_\_\_\_\_ No \_\_\_\_\_

*\*If yes, please attach a copy of materials*

If No, please provide a brief explanation:

---

Is the Equal Housing Opportunity logo displayed on all printed materials? Yes \_\_\_\_\_ No \_\_\_\_\_

**Community Planning, Development & Innovation  
Sales & Affirmative Marketing Plan**



If no, please provide a brief explanation and your plan and timeline to update all printed materials with the Equal Housing Opportunity logo:

**Community Contacts:** To further inform the group(s) **least likely to know** about the availability or apply to the housing/service, the lead agrees to establish and maintain contacts with the groups/organizations listed below that are located in the market area. The lead must provide all requested information. Keep records of correspondence with these groups/organizations, if not available provide date when it will be sent to the community contact. Any contact changes should be updated in the chart below.

Name of Organization	Primary Group Served (ref. section 3)	Approximate date of marketing	Person Contacted to provide marketing assistance (name, email)	Specific function the Group/Organization will undertake in implementing the marketing program

**Community Contacts-Tracking Referrals:** If assistance by above listed groups includes making referrals and disseminating marketing information on behalf of the project lead; then the lead must track the marketing activities by the community group and candidates referred by these organizations (**attach plan, if applicable**)

**Review and Update:** By signing this form, the applicant agrees to follow this Affirmative Marketing Plan and provide updates as needed within the life of the developer agreement (no less than one year from date of the plan) to ensure continued compliance with local equal opportunity regulations and CPDI's affirmative marketing policies.

Signature:	Date:
Name & Title (type of print):	

**For CPDI- Administrative/Monitoring Use Only**

Reviewed By		Approved By	
Name & Title	Date:	Signature:	Date:
Findings:		Name & Title:	
Notification sent (mm/dd/yy):			

## Appendix II

### Affordable Homes on Sale Now!

[Enter logo or name of builder/developer Here]

#### Contact Information

Unit Type:

Price:

Bedrooms:

Bathrooms:

Square Footage:

HOA Fees:

Est. Property Taxes:

Year Built:

Photo/Plan

[Address]

Missoula, MT 59802

#### Requirements:

- Income qualify at or below 120% Area Median Income
- (add additional requirements as indicated by project)

Photo/Plan

Enter a description of the property including any additional amenities



#### Contact Emily Harris-Shears for more information:

Emily Harris-Shears, Affordable Housing Trust Fund Administrator  
City of Missoula, Community Planning, Development & Innovation

(406) 552-6394 or [harris-shearse@ci.missoula.mt](mailto:harris-shearse@ci.missoula.mt)



## Appendix III

### ATTACHMENT A

**NON-DISCRIMINATION.** All hiring shall be on the basis of merit and qualification and there shall be no discrimination in employment on the basis of race, ancestry, color, physical or mental disability, religion, national origin, sex, age, marital or familial status, creed, ex-offender status, physical condition, political belief, public assistance status, sexual orientation or gender identity/expression, except where these criteria are reasonable bona fide occupational qualifications.

**AFFIRMATIVE ACTION POLICY.** Contractors, subcontractors, sub grantees, and other firms doing business with the City of Missoula must be in compliance with the City of Missoula's Affirmative Action Plan, and Title 49 Montana Codes Annotated, entitled "Human Rights" or forfeit the right to continue such business dealings.

**The City's Affirmative Action Policy Statement is:**

The Mayor of the City of Missoula or the Mayor's designee may adopt an affirmative action plan to provide all persons equal opportunity for employment without regard to race, ancestry, color, handicap, religion, creed, national origin, sex, age, or marital or familial status, ex-offender status, physical condition, political belief, public assistance status, sexual orientation or gender identity/expression except where these criteria are reasonable bona fide occupational qualifications. In keeping with this commitment, we are assigning to all department heads and their staff the responsibility to actively facilitate equal employment opportunity for all present employees, applicants, and trainees. This responsibility shall include assurance that employment decisions are based on furthering the principle of equal employment opportunity by imposing only valid requirements for employment and assuring that all human resource actions are administered on the basis of job necessity.

Specific responsibility for developing, implementing, monitoring and reporting are assigned to the City Human Resource staff under the supervision and direction of the Chief Administrative Officer and the Mayor.

It is the policy of the City of Missoula to eliminate any practice or procedure that discriminates illegally or has an adverse impact on an "affected" class. Equal opportunity shall be provided for all City employees during their terms of employment. All applicants for City employment shall be employed on the basis of their qualifications and abilities.

The City of Missoula, where practical, shall utilize minority owned enterprises and shall ensure that subcontractors and vendors comply with this policy. Failure of subcontractors and vendors to comply with this policy statement shall jeopardize initial, continued, or renewed funds.

Our commitment is intended to promote equal opportunity in all employment practices and provide a positive program of affirmative action for the City of Missoula, its employees, C.E.T.A program participants, trainees and applicants.