CITY OF BILLINGS

Analysis of Impediments to Fair Housing Choice

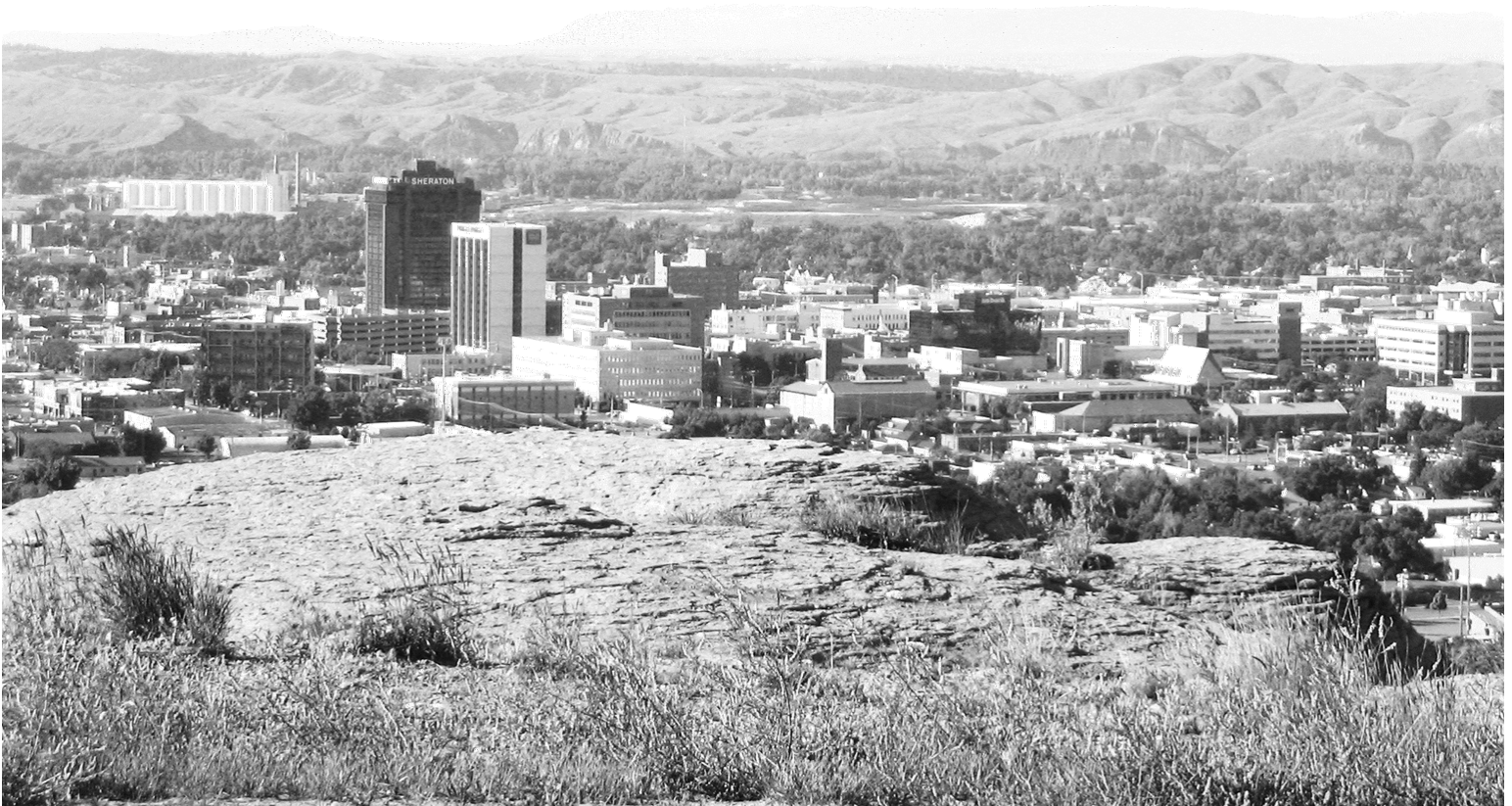### 2020

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Introduction

The Analysis of Impediments to Fair Housing Choice (AI) is the result of a statewide effort spearheaded by the Montana Department of Commerce and Public Health and Human Services (the State) in collaboration with entitlement communities including the City of Billings, City of Missoula, and the City of Great Falls. Entitlement communities are 1) principal cities of metropolitan statistical areas, 2) Other metropolitan cities with populations of at least 50,000 or 3) urban counties with populations of at least 200,000 (not including cities existing in the county that are qualified entitlement cities).

Purpose

As recipients of funding allocated by the United States Department of Housing and Urban Development (HUD), the State and entitlement communities are required to: conduct an analysis to identify impediments to fair housing choice; take and maintain records of appropriate actions to overcome the effects of identified impediments. HUD allocates funding to the State and entitlement communities through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Housing Trust Fund (HTF), Housing Opportunities for Persons with Aids (HOPWA) and the Emergency Solutions Grant (ESG).

According to HUD's Fair Housing Planning Guide, impediments to fair housing choice are defined as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice, or other protected characteristics and any actions, omissions, or decisions that have this effect. The list of protected classes included in this definition is drawn from the federal Fair Housing Act, which was first enacted in 1968. State and local governments may enact fair housing laws that extend protection to other groups, and the AI is to address housing choice for these additional protected classes as well. Montana state code has extended additional fair housing protections based on creed, marital status, and age. The Cities of Bozeman, Butte, Helena, and Missoula have adopted ordinances prohibiting housing discrimination based on sexual orientation and gender identity or expression.

The AI process involves a thorough examination of a variety of data related to housing in Montana, much of the data highlighted are based on HUD recommendations. This data is collected, analyzed and assessed to determine the housing barriers residents of Montana experience. Identified impediments are then used to establish quantifiable goals and the reduction of the barriers to fair housing choice. The AI is also subject to an extensive public comment review process before submission to HUD.

Analysis of Past Goals and Actions

The most recent City of Billings AI was completed in 2013. It has been used in planning activities for the use of federal funding from July 1, 2013 through June 30, 2018, extended through the year 2020. Selected impediments and goals outlined in the AI have been carried forward through the City's Consolidated / Annual Action Plans. Activities taken to affirmatively further fair housing have been documented in the City's Comprehensive Annual Performance Evaluation Report.

Impediments and Goals

- **Concentrations of minorities that would not exist in a free market not distorted by discrimination suggest that Billings has a dual housing market; one for non-Hispanics, whites and Asians and another for all other minorities.**
  - Produce and disseminate consumer education on Fair Housing issues through ongoing publicity campaigns to make people aware that they can move anywhere in the area they can afford.
  - Work to expand housing choices of existing and potential new residents beyond neighborhoods identified by their own race or ethnicity.

- **Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing.**
  - Continue to partner with enforcement agencies providing testing of the real estate industry practitioners to identify discriminatory practices in rental and for-sale housing.

- **Discrimination against Latinos in issuing government-backed mortgage and refinancing loans continues unabated in Billings as it does throughout the nation.**
  - Support the efforts of local housing counseling agencies, especially to Latinos, before they apply for a mortgage.
  - Continue to provide brochures containing information apprising potential home buyers of the availability of housing counseling and how to spot / report discriminatory lending practices.

- **The relatively high cost of housing continues to pose a barrier to fair housing choice in Billings.**
  - Continue to work toward the provision of affordable housing through Community Development programs including home buyer, home repair, housing development, and poverty-impact programs.

- **Review Unified Zoning Regulations and review requirements to foster compliance with fair housing law and to promote inclusionary zoning.**
  - Support the efforts of the Planning Division in reviewing:
    - Minimum percentage of affordable housing units per development with five or more units.
    - Amendments for neighborhood plans to promote stable, socio-economically diverse neighborhoods throughout Billings.
    - Occupancy requirements and equal treatment for group living for the disabled.
    - Accessory dwelling units / cottage cluster homes.

Education and Citywide Housing Choice: The City of Billings' AI revealed the beginnings of segregated neighborhoods and lending discrimination for Hispanic Americans in Billings. The Analysis contained the following recommendation:

> *Billings should establish a housing service center… where home seekers are introduced to housing options beyond the racial or ethnic neighborhoods to which they often feel they are limited.*

The City of Billings sponsored a full-year VISTA member to assist NeighborWorks Montana in researching the feasibility of establishing a comprehensive housing center to serve low income renters and homeowners. The VISTA member facilitated a working group comprised of the Billings affordable housing organizations to bring the Home Center into fruition. Participants included the City of Billings, the Housing Authority of Billings, Rebuilding Together Yellowstone County, District 7 HRDC, Rural Dynamics, Beartooth Resource Conservation and Development, and Homeword.

After 18 months of planning, the Home Center opened in July 2015 and it is located in downtown Billings, which is central to the City's low income neighborhoods. The City provided a second, full-year VISTA member from July 2015 to July 2016 to help create the Home Center's housing programs. Today, the Home Center provides comprehensive housing services including information on available units, fair housing information, housing education and counseling. Housing services are coordinated under one roof, creating the opportunity for potential homebuyers and renters seeking safe, affordable homes and access to all housing services in a one-stop-shop. Homebuyer education is provided to over 400 people annually. The City of Billings has focused distribution of investments on a citywide basis in order to support diversity and mixed-income development across the community. The City's performance in serving predominantly low income households is clear via Integrated Distribution Information System (IDIS) reporting; nearly 100%.

Enforcement Agency Support: The City of Billings maintains a positive relationship with Montana Fair Housing. City staff actively recruits new fair housing testers, particularly minorities, to support enforcement work. These testers work in conjunction with Montana Fair Housing to uncover evidence of housing discrimination.

Minority Lending: The City of Billings staff routinely attend community events in neighborhoods with high Hispanic and minority concentrations to promote homeownership and fair housing education. All homebuyers participate in homebuyer education to ensure pre-purchase knowledge of fair housing, equal opportunity, and fair lending practices.

The City of Billings also maintains a website and fair housing resources to further education on fair housing and discriminatory practices. The website is located at www.CityofBillings.net/fairhousing.

Affordable Housing: The City of Billings provides first time home buyer and home repair assistance to expand affordable housing options for households with incomes less than 80 percent of the Area Median Income. The City also provides financing to housing developers for construction or repair of single- or multi-family housing.

Zoning: The City's Planning Division is currently reviewing all of the City's zoning codes relative to continuity, to promote inclusionary zoning, and the expansion of affordable housing opportunity citywide. The project began in late 2017 and continued through 2019 and is named [Project Re:Code](). The

Community Development Division staff successfully placed three AmeriCorps VISTA members to assist with this initiative. Progress to date is significant. This fiscal year, the Planning Division announced a major project milestone and educational webpages.

The new City of Billings Pattern Guide is designed to provide guidance to homeowners, home builders, and small business owners looking to invest in the First Neighborhoods of Billings, which are the lowest income and highest minority neighborhoods in Billings. The webpages feature detailed information on Billings' First Neighborhoods – South Side, North Park, Pioneer Park and Central Terry (all low income neighborhoods). The First Neighborhoods of Billings are close-in residential areas around Downtown. Three additional neighborhood pages will be coming forward in the near future – West Central, Heights and West Shiloh. The authors and designers, Billings Metro VISTA Project members Claire Yang and Jacob Cote, crafted this extensive guide and educational resource for all Billings residents.

Assessment

The City's activities to affirmatively further fair housing should be continued through home buyer / repair and housing development programs. In addition, City staff plans to continue supporting enforcement efforts and education provided through the Home Center and community events. Efforts to expand affordable housing choice is one of the primary goals driving Project Re:Code. New zoning codes are near completion and City Council review for adoption is expected to occur in 2020.

Methodology

This AI planning process included assessment of both qualitative and quantitative sources including surveys, public meetings, working groups and public input. Sources used in analyzing fair housing choice in Montana include, but are not limited to:

- Socio-economic and housing data from the U.S. Census Bureau

- [HUD maps and tables from the Mapping Tool](#)

- Employment data from the U.S. Bureau of Labor and Statistics

- Economic data from the U.S. Bureau of Economic Analysis

- Investment data gathered in accordance with the Community Reinvestment Act

- Home loan application data from the Home Mortgage Disclosure Act (HMDA)

- Housing Complaint data from HUD, Montana State Human Right Bureau, Montana Fair Housing, City of Great Falls Fair Housing Specialist, and Montana Legal Services

- Billings Zoning Laws

- Local data and knowledge from Fair Housing surveys

Qualitative research was conducted through the Community Fair Housing Survey. Public and Tribal Housing Authorities provided anecdotal data regarding housing. HUD provided data to analyze fair housing and equal opportunity issues.

Other data is sourced from the American Community Survey, the most recent U.S. Census and community surveys (formulated as a group). The goals selected in this document have to coherently connect to strategies and actions in various plans connected to the entitlement communities. It should be noted that all outside sources are cited, however, information not specified should be assumed to be the 2010 HUD provided data from HUD Exchange.

Finally, a list of impediments was drawn from these sources and further evaluated based on HUD's definition of impediments to fair housing choice, as presented previously. Potential impediments to fair housing choice were identified along with actions that may be taken to address these impediments. Goals corresponding to the identified impediments create measurable ways to assess the removal of said impediments. The decided strategies aid local and state jurisdictions in reaching the established goals.

Findings

Housing Choice: The most significant factor for rental housing choice is affordability, followed by unit size and required deposit in second position. This is followed by neighborhood, then credit score. The most significant factor for homeownership housing choice is affordability, followed by home size, and then neighborhood. The availability of grocery stores, parks, banks, and housing conditions are the top neighborhood amenities noted by survey respondents. Respondents note lowest availability of neighborhood lighting, libraries, jobs, and public transit. Increased housing rent / payments is cited as the most significant factor in worsening housing choice or situation followed by crime, job loss, and extreme weather.

Segregation: The White population in Billings is decreasing – six percent from 1990 to 2010 and the percentage of racial and ethnic minorities are increasing. According to HUD's Dissimilarity Index, the separation of racial and ethnic groups across Billings is relatively low. However, HUD's fair housing mapping tool indicates three Census Tracts in Billings with minority populations greater than 20%: the South Side (3.0); Southwest Corridor (9.02); and the North Park neighborhood (2.0). The trend of segregation appears to be moving north into a small area of the Billings Heights (Census Tract 7.05) and west through central Billings (Census Tract 1000 and surrounding neighborhoods). There appears to be an isolated minority concentration on the far west end of Billings (Census Tract 17.03) with a ten percent minority population. This data indicates Billings is in the beginning stages of segregation.

Housing Problems: Racial and ethnic minority households in Billings are experience more housing problems than the White, Non-Hispanic population. Only 28% of White families have an identified housing problem while an average of 46% of all racial and ethnic minorities in Billings are experiencing at least one housing problem. When compared to the White population, Native American and Asian households in Billings are experiencing severe cost burden.

Housing cost burden was also noted as a significant issue in the Montana Fair Housing Community Survey. Nearly 60% of respondents have experienced housing cost increases over the past five years and property taxes are the main reason for these increases.

Homeownership: Racial and ethnic minorities have a low homeownership rate than the White population (67%) in Billings. The Black cohort has the lowest homeownership rate at 16% followed by Native Americans at 31%. Thirty-three percent of the Hispanic cohort are homeowners.

Opportunity: The Low Poverty Index indicates Hispanic people in poverty have the lowest opportunity index score of any group in Billings. This is the lowest opportunity score in the Low Poverty Index and the most significant discrepancy when comparing those in poverty to the overall population. The overall Native American population also appears to have low access to opportunity in this assessment.

Educational Opportunity: Educational data indicates disproportionate success of racial / ethnic groups in meeting or exceeding educational standards in Billings' elementary schools. The percentage of low income students (eligible for free / reduced lunch) meeting or exceeding educational standards is significantly lower than the overall student population in both English Language Arts and Mathematics. Likewise, minority students, including those identified as American Indian, Hispanic, or Multi-Racial are also less successful in meeting or exceeding educational standards.

Discrimination: Discrimination complaint data indicates that the disabled are at higher risk for discrimination and retaliation than any other cohort. Failure to make reasonable accommodation is the most significant discrimination issue in Montana. Montana Fair Housing filed 30% of the viable discrimination cases in the state. Rental owners / managers are cited as the primary person / organization engaging in discriminatory behavior. Income is the primary reason cited for housing discrimination, followed by race, criminal background, then source of income.

The majority (85%) of the Fair Housing Community Survey respondents are not familiar or somewhat familiar with fair housing laws. Although 36% of respondents state they have witnessed housing discrimination.

Impediments and Strategies

- **Housing affordability limits rental and owner housing choice and opportunity.**

- **Housing cost burden is the most significant issue for both rental and ownership households.**

   o City staff will continue efforts to improve housing affordability for homeowners and renters through affordable housing development, homebuyer, and home repair assistance programs.

- **Billings is in the beginning stages of segregation.**

   o The location of new housing development and assistance programs will continue on a citywide basis.

- **Low-Income racial and ethnic minorities are disproportionately and negatively impacted by: housing problems; homeownership rates; opportunity scores; and access to education.**

   o The City will continue efforts to target marketing efforts to reach ethnic and racial minorities to improve access to housing opportunity.

   o The City will also continue to support the Billings Metro VISTA Project as an anti-poverty strategy to expand access to: housing; healthcare; education; food security; and economic opportunity.

- **Montana citizens are unfamiliar with fair housing laws.**

   o City staff will continue efforts to provide fair housing education materials on the City's website, in the office, at the Home Center, and will support fair housing educational opportunities with Montana Fair Housing.

Describe and compare segregation levels in the jurisdiction. Identify the racial/ethnic groups that experience the highest levels of segregation and how these segregation levels have changed since 1990.

Race / Ethnicity

The City of Billings is the largest, most populated city in Montana with an estimated population just under 110,000 people within the City limits. According to the 2017 American Community Survey's five-year estimate, the ethnic composition of the population is largely White, Non-Hispanic (87 percent), followed by Hispanic or Latino residents (five percent). Just under four percent of the population are American Indian & Alaska Native residents. In 2017, there were 13.7 times more White residents (93,300 people) in the Billings Metro Area than any other race or ethnicity. According to DataUsa, the second and third most common racial / ethnic groups were Hispanic or Latino (6,830) and American Indian & Alaska Native (4,520) residents.

Billings has become a more diverse community since 1990. The White, Non-Hispanic population has declined nearly six percent and the racial / ethnic minority population has increased nearly six percent, collectively.

Racial / Ethnic Trends in Billings					
Race / Ethnicity		**Year**			
		1990	**2000**	**2010**	**Change**
White	**Non-Hispanic**	92.94 %	90.19 %	86.99 %	(5.95) %
Black		0.46 %	0.77 %	1.30 %	0.84 %
Asian / Pacific Islander		0.58 %	0.93 %	1.23 %	0.65 %
Native American		2.9 %	3.91 %	5.17 %	2.27 %
Hispanic		3 %	4.03 %	5.22 %	2.22 %

HUD Table 2: Brown Longitudinal Tract Database using decennial census data,2010, 2000 & 1990

HUD's Dissimilarity Index is designed to measure the relative separation or integration of racial and ethnic groups across a jurisdiction. According to this Index, the City of Billings has low segregation levels at present, although dissimilarities existed between Black and White cohorts in 1990. In 1990, there were less than 400 Black, Non-Hispanic individuals living in Billings; less than one percent of the City's total population. Further analysis is required to determine the levels of integration and segregation in the City.

Dissimilarity Trends in Billings				
Zero - Complete Integration, 0 to 39 - Low Segregation, 40 to 54 - Moderate Segregation, 55 to 100 - High Segregation, 100 - Complete Segregation				
Dissimilarity Index	**Year**			
	1990	**2000**	**2010**	**2016**
Non-White / White	31.07	26.27	21.86	25.45
Black / White	42.57	27.62	23.16	32.00
Hispanic / White	34.79	30.84	24.05	25.57
Asian or Pacific Islander / White	12.29	12.35	12.41	19.38

HUD Table 3: Decennial Census, 2010; Brown Longitudinal Tract Database based on decennial census data, 2010,2000 & 1990

HUD's mapping tool can be used to identify areas of integration and segregation. The Race / Ethnicity Trends map illustrates minorities and non-minorities located throughout the jurisdiction with minimal segregation.

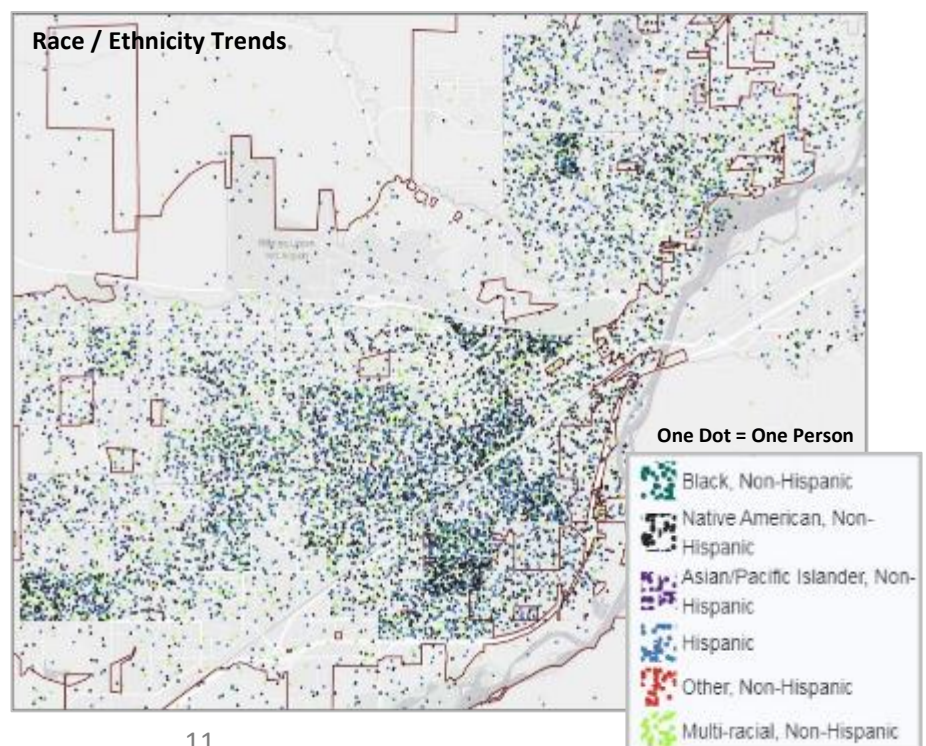On first glance, minority concentrations in Billings appear to be minimal. Each dot on this version of Race / Ethnicity Trends map represents 20 people and minority locations are indicated citywide. There appears to be a higher concentration of White, Non-Hispanic persons in central Billings and also on the West End. Minorities appear to be distributed citywide with slightly higher concentrations in central Billings, on the South Side, and in the Billings Heights.

Race / Ethnicity Trends

One Dot = 20 People

Black, Non-Hispanic
Native American, Non-Hispanic
Asian/Pacific Islander, Non-Hispanic
Hispanic
White, Non-Hispanic
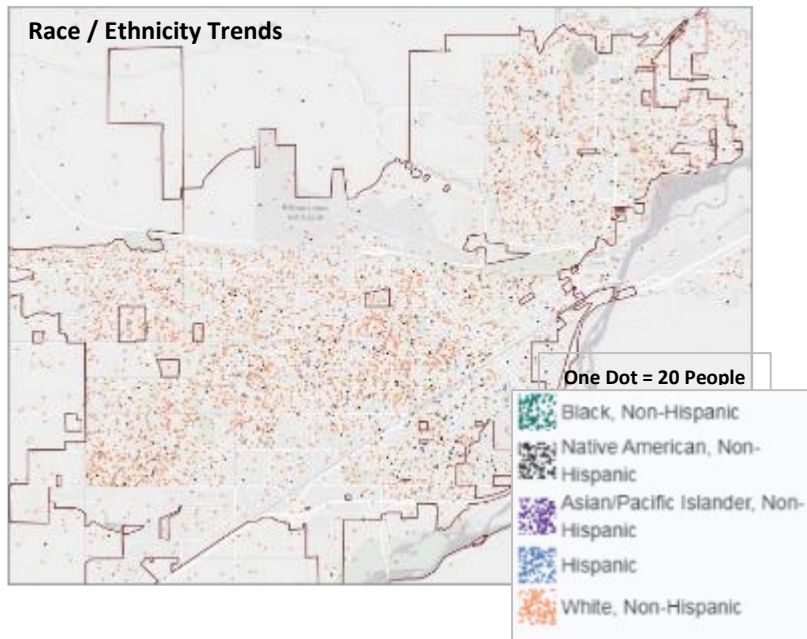
A different pattern appears when the White, Non-Hispanic population indicators are removed and one dot represents one person. Minorities appear more concentrated in several areas of the City. The Billings 2013 Analysis of Impediments to Fair Housing Choice indicated that the City has a rare opportunity to prevent segregation from developing. The early stages of segregation were identified in Census tracts 3.0, 9.02, and 2.0 with a pattern of segregation moving westward.

The Race / Ethnicity Trends map identified the same three Census Tracts with minority populations greater than 20 percent: the South Side (3.0); Southwest Corridor (9.02); and the North Park neighborhood (2.0). The trend of segregation appears to be moving north into a small area of the Billings Heights (Census Tract 7.05) and west through central Billings (Census Tract 1000 and surrounding neighborhoods). There appears to be an isolated minority concentration on the far west end of Billings (Census Tract 17.03) with a ten percent minority population.

Race / Ethnicity Trends

One Dot = One Person

Black, Non-Hispanic
Native American, Non-Hispanic
Asian/Pacific Islander, Non-Hispanic
Hispanic
Other, Non-Hispanic
Multi-racial, Non-Hispanic

National Origin

Less than two percent of residents in Billings were born outside of the United States and this figure has been fairly consistent from 1990 through 2017. HUD's data from the Decennial Census and American Community Survey indicate a slight increase in foreign-born residents in Billings; 1,329 people (1.57%) in 1990 compared to 1,823 (1.75%) in 2010. HUD's National Origin map indicates some areas in Billings that may have slight concentrations of people born outside of the United States.

National Origin in Billings

One Dot = One Person
- China excl. Hong Kong & Taiwan
- Canada
- Mexico
- Philippines
- Peru
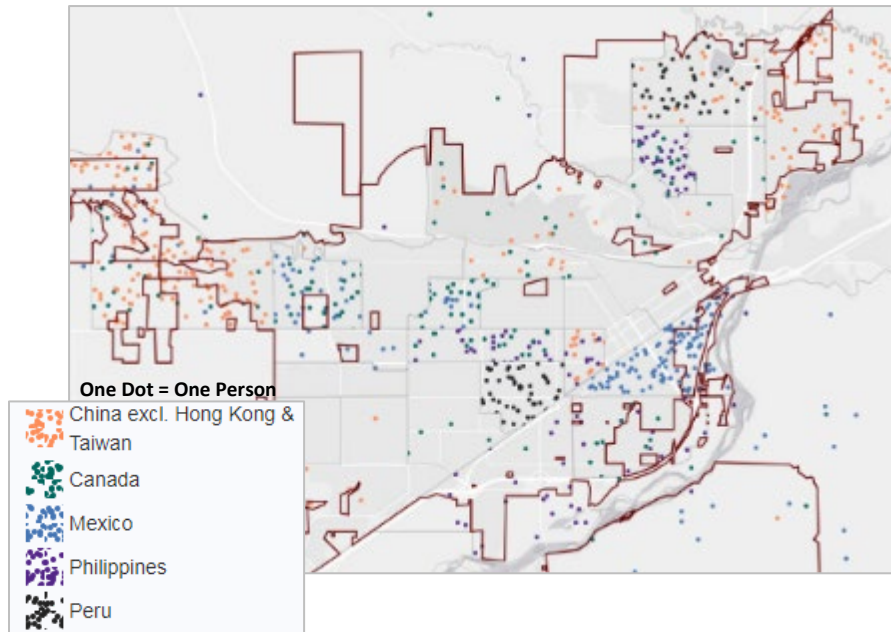
Limited English Proficiency

Approximately one percent of the residents in Billings have Limited English Proficiency (LEP). The top three LEP groups in Billings are Spanish, Chinese, and Other Native American Language. This map indicates 109 people that are speaking a Native American language in the downtown area of Billings.

There are 143 people speaking Chinese and 10 people speaking German in the far northwestern corner of Billings.

Spanish-speaking citizens are located in several areas of the City: northwest (65); north-central (41); south-central (123); Heights (100); and the South Side (48).

One Dot = One Person
- Spanish
- Chinese
- Other Native American Language
- German
- Korean

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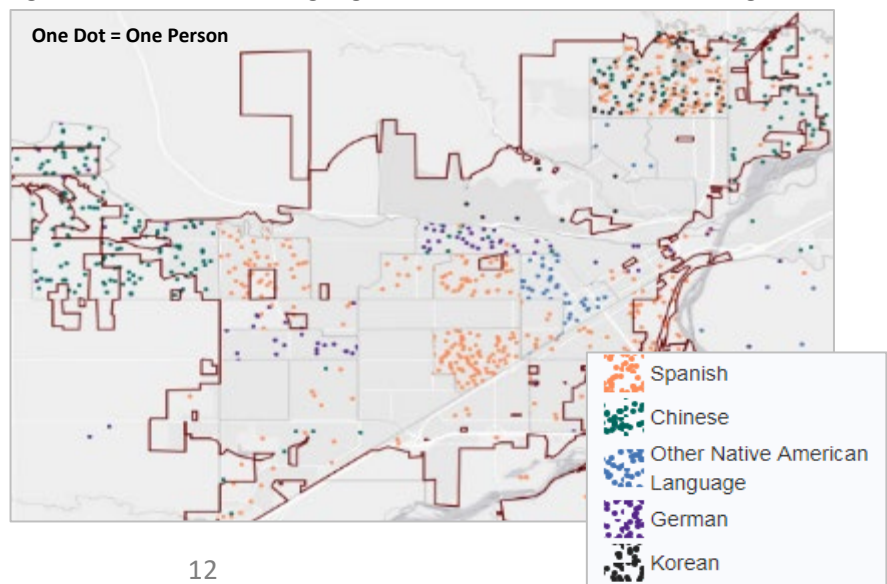
Low Poverty Index

The Low Poverty Index is an opportunity indicator that captures the depth and intensity of poverty in a given neighborhood through data analysis of family poverty rates and the percentage of households receiving public assistance at the Census Tract level. The Index is a value ranging from zero (higher access to opportunity) to 100 (lower access to opportunity).

Race / Ethnicity: In the Poverty and Race / Ethnicity map below, the darker gray areas indicate neighborhoods with low exposure to poverty and the lighter areas indicate higher exposure. There appears to be a fairly even distribution of people with varying race and ethnicity in these areas citywide.
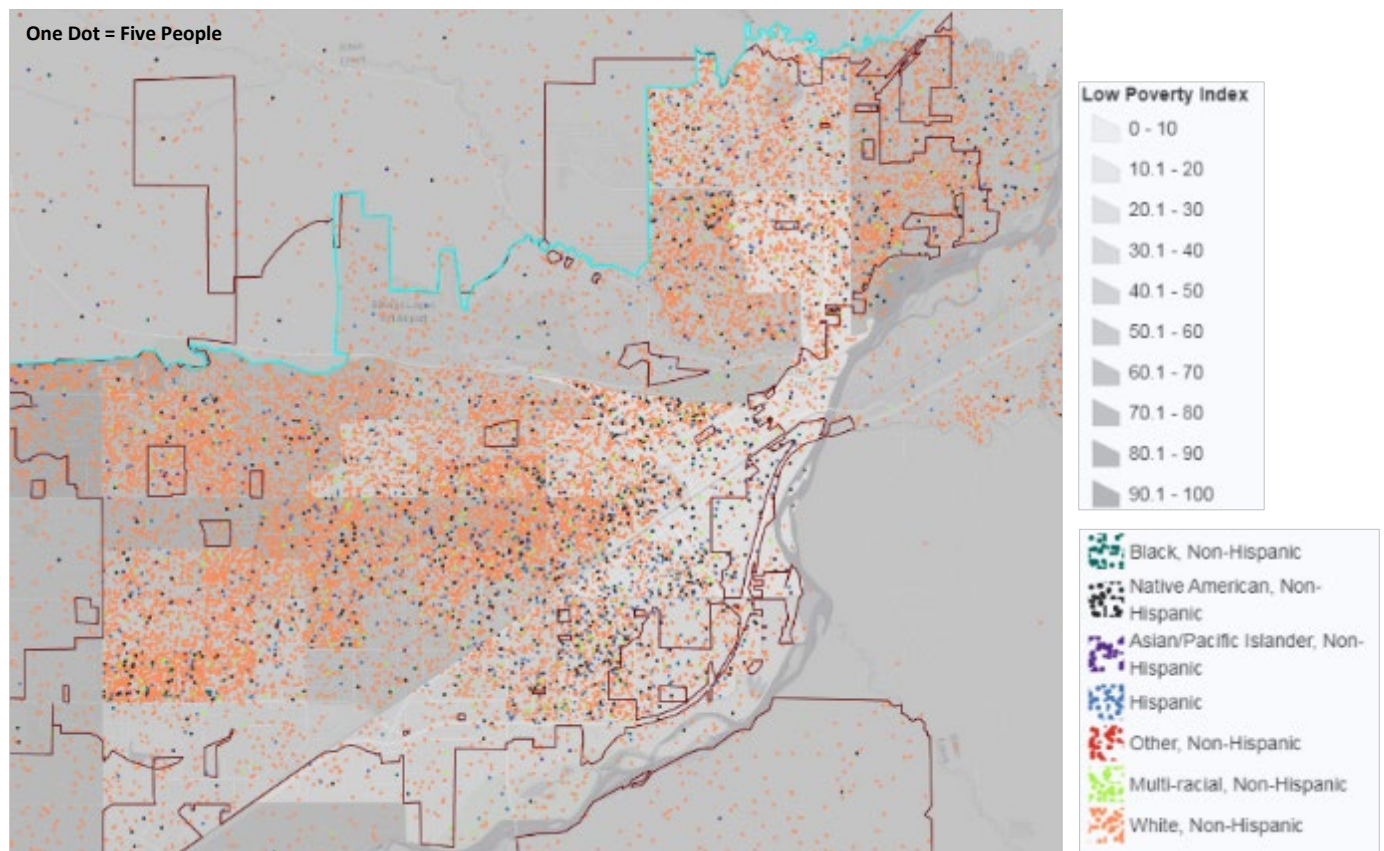
Opportunity Indicator - Low Poverty Index				
Zero - Low Access to Opportunity, 100 - High Access to Opportunity				
Race / Ethnicity		Total Population	Poverty	Difference
White	Non-Hispanic	53	44	10
Black		44	30	14
Asian / Pacific Islander		56	52	4
Native American		39	32	7
Hispanic		43	25	18

HUD Table 12, American Community Survey, 2009-2013

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In the chart above, the Native American population has the lowest index opportunity score (39) and those in poverty have an index opportunity score of 32. The overall Native American population has the lowest access to opportunity in this assessment.

The Hispanic cohort has an overall index score of 43, although the group's opportunity score plummets to 25 for those experiencing poverty. Hispanic people in poverty have the lowest opportunity index score of any group in Billings. This is the lowest opportunity score in the assessment and the most significant discrepancy when comparing those in poverty to the overall population.

The Black population has an opportunity index score of 44 and those in poverty have a score of 30. This is also a significant difference between the overall population and those experiencing poverty with a 14 point disparity. The Asian / Pacific Islander population has the highest opportunity score of any group in Billings (56) and those in poverty also have the highest score (52). The overall White population also has a high opportunity index score (53) and a poverty score of 44.
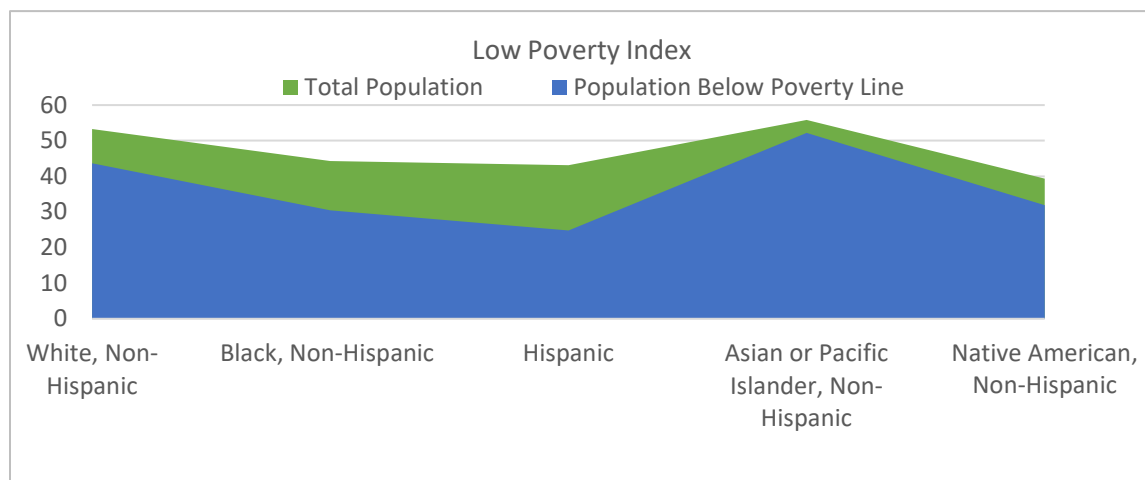
National Origin: While evaluating the locations of those born outside of the United States in relation to the Low Poverty Index, it is important to note that less than two percent of the Billings population is foreign-born. Minorities are living in many areas of Billings and in Census Tracts with a range of scores in the Low Poverty Index.

People born in China are living in the Heights neighborhood in Census Tracts with a Low Poverty Index of 39 (7.01) and another tract (7.02) with an index score of 69. They also reside on the west end in a Census Tract with a very high index score of 97 (18.01).
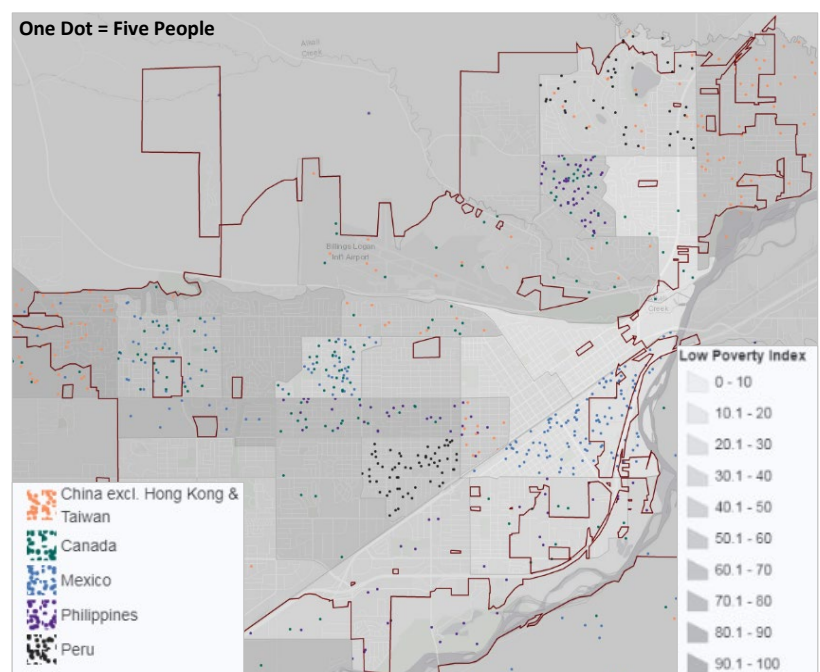
People born in Mexico are living in: Census Tract 18.01 with a Low Poverty Index score of 97; Tract 18.02 with a score of 64; Tract 12.00 with a score of 33; and in Tract 3.00 with an index score of 11.

Family Status: The percentage of families in relation to the Low Poverty Index appears to be distributed across the City of Billings with varying access to opportunity. The percentage of families by Census Tract Block Groups ranges from 23 to 60 percent.
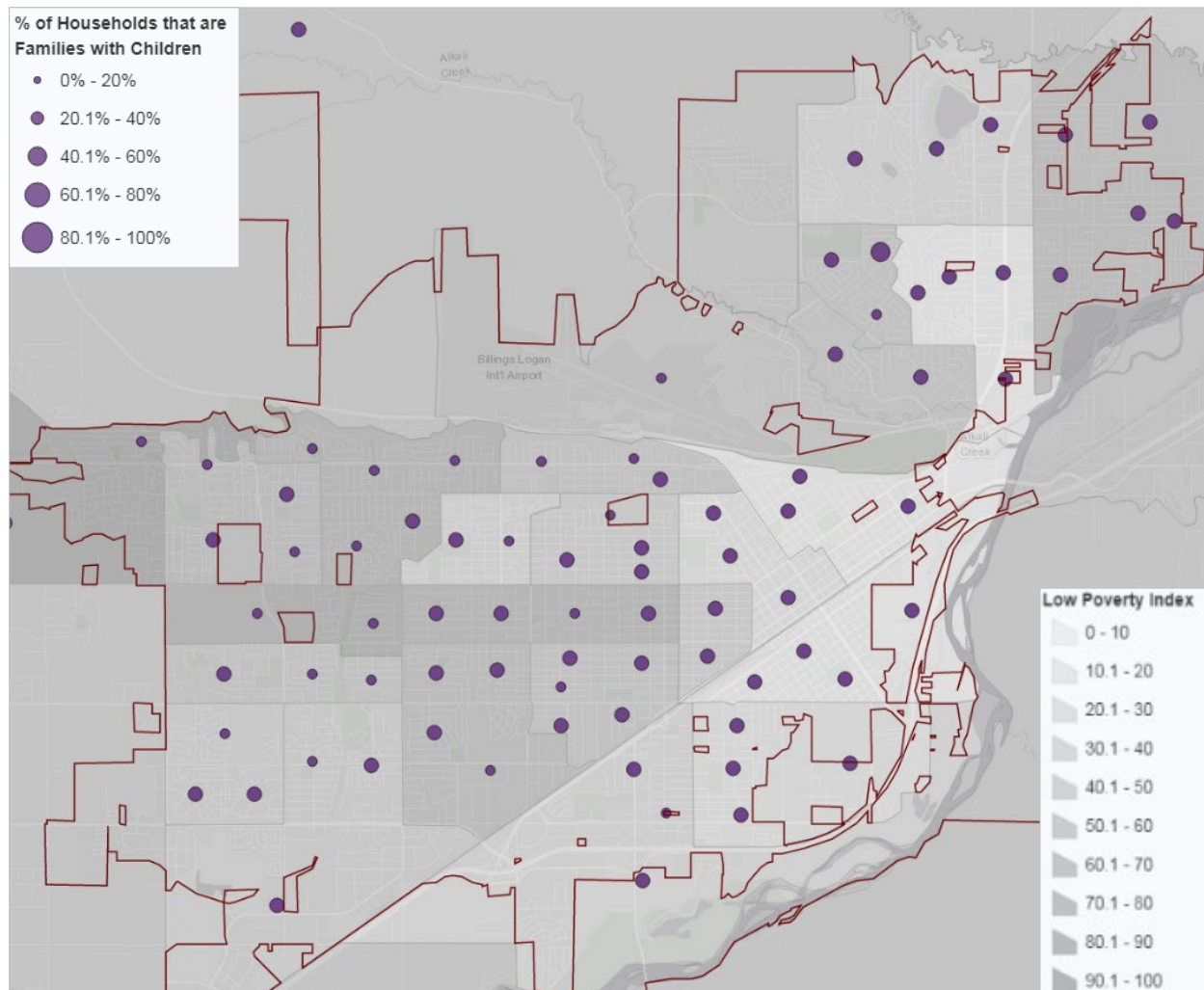
Analyze and assess if any groups of persons in the context of protected classes experience greater housing needs when compared to other populations in the jurisdiction and statewide.

Introduction

The Disproportionate Housing Needs section analyzes if people of specific protected classes in the entitlement cities and statewide experience greater housing needs compared to other populations. Understanding if certain demographics are more likely to experience different or higher housing needs is crucial to furthering fair housing choice and addressing those housing needs through policy. The data that informs this report regarding disproportionate housing needs come from the Comprehensive Housing Affordability Strategy (CHAS) data. CHAS data is a special tabulation that counts the number of housing units/households that have certain combinations of HUD-specified characteristics, summarized for HUD-specified geographies.

Definitions

There are four **housing problems** in the CHAS data:

> 1) A housing unit lacks complete **kitchen** facilities.

> 2) A housing unit lacks complete **plumbing** facilities.

> 3) **Overcrowding** is defined by having more than 1 person per room, while **severe overcrowding** is defined as having more than 1.5 persons per room.

> 4) **Cost burden** is defined as a household paying more than 30% of income on housing, and **severe cost burden** is paying more than 50% of income on housing.

A household is said to have a housing problem if they have any 1 or more of these 4 problems.

Severe Housing Problems are defined by increasing metrics of the above four housing problems.

Disproportionate housing needs refer to any household experiencing any of the housing problems: incomplete plumbing, incomplete kitchen, overcrowding, and housing cost burden.

Substandard housing contains two of the four housing problems: housing units lacking kitchen and plumbing facilities. More specifically, the criteria is households without hot and cold piped water, a flush toilet and a bathtub or shower; and households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

Cost burden is defined as a household paying more than 30% of income on housing, and **severe cost burden** is paying more than 50% of income on housing.

Protected classes include race, color, religion, national origin, sex, disability and familial status. Housing barriers encompassed under disproportionate housing can disproportionately affect certain protected groups of communities compared to other protected groups. By looking at these issues, patterns can be seen and better understood about the housing environment that protected groups are facing in the state. In this section, entitlements will present the needs of families with children in terms of the stock of publicly supported housing and the differences in rates of renter-occupied and owner-occupied housing by race and ethnicity. Lastly, a comparison of findings is identified by each entity.

Renters and Homeownership

The White population in Billings is the only group with a majority who are homeowners (67 percent of the total 39,730 households). In contrast, the majority of all 4,413 racial / ethnic minority households are renters. Although the Black, Non-Hispanic population is represented in the table below with 480 owner / renter households, they represent the highest renter rate of all minorities at 84 percent. The data indicates 1,385 total Native American households in Billings and 69 percent are renters, 31 percent are homeowners.

Homeowners and Renters by Race / Ethnicity
Owner ■ Renter

	White, Non-Hispanic	Black, Non-Hispanic	Hispanic	Asian or Pacific Islander, Non-Hispanic	Native American, Non-Hispanic	Other, Non-Hispanic
Renter	33%	84%	67%	55%	69%	66%
Owner	67%	16%	33%	45%	31%	34%
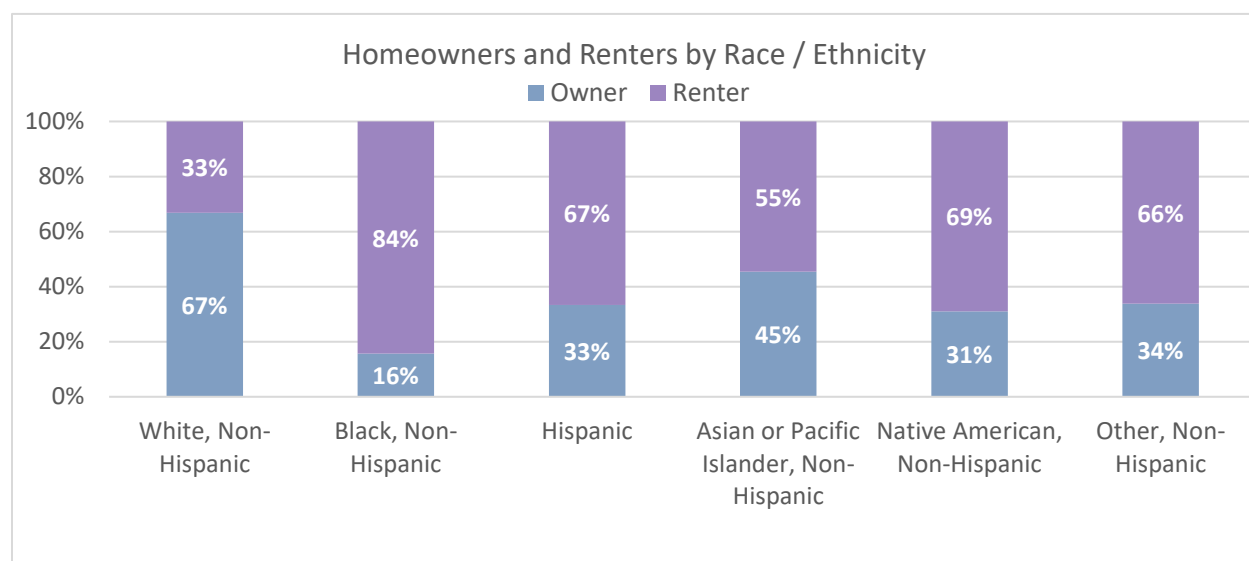
HUD Table 16, 2010

Owners represent 33 percent of the total 1,605 Hispanic households in Billings. The other 67 percent of Hispanic households are renters. The data indicates there are 293 and 650 Asian / Pacific Islander and Other Non-Hispanic households in Billings, respectively. Forty-five percent of Asian / Pacific Islander households are homeowners while 55 percent are renters. Thirty-four percent of the Other, Non-Hispanic households are homeowners and the remaining 66 percent are renters.

According to HUD map 16 (below), the majority of households in the North Park neighborhood are renters. The surrounding North Elevation and South Side neighborhoods also have higher percentages of rental units while central, Southwest Corridor, and the northern areas of Billings have higher percentages of homeownership housing units.

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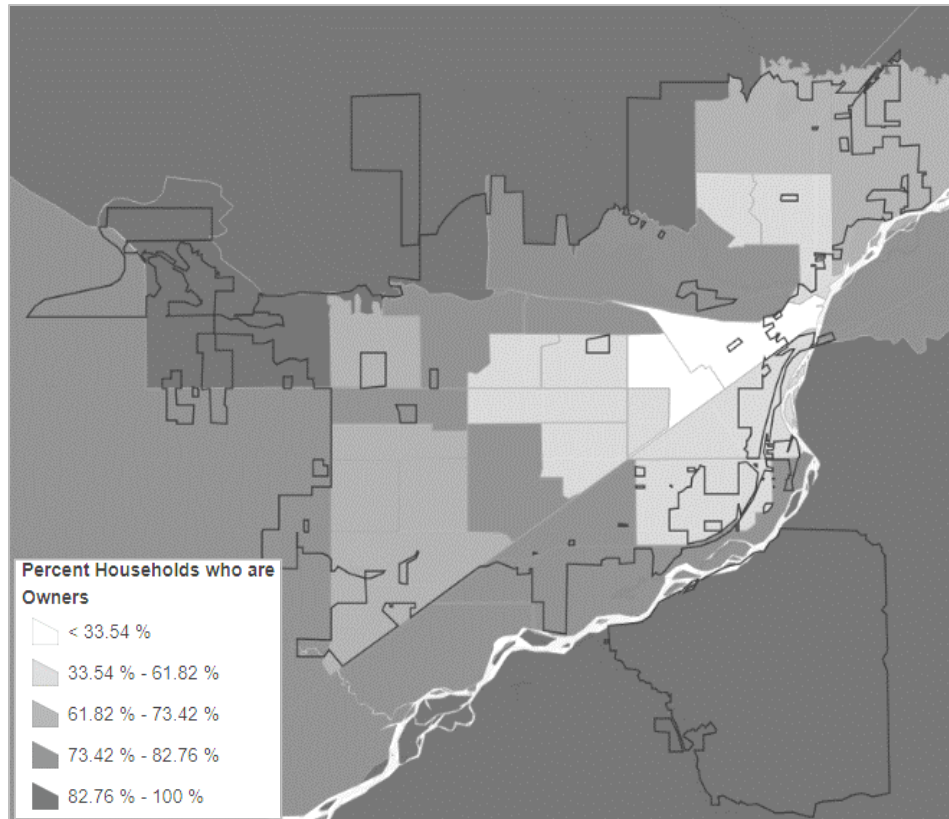
HUD Map 16, 2010

Housing Problems

Racial and ethnic minority households in Billings are experience more housing problems than the White, Non-Hispanic population. HUD's Table 9 data illustrates that 734 of the 1,374 Native American households are experiencing at least one housing problem such as incomplete kitchen or plumbing facilities, more than one person per room, or cost burden greater than 30 percent. The data also illustrates 473 of the total 1,374 Native American households are experiencing incomplete kitchen or plumbing facilities, more than one and a half persons per room, or cost burden greater than 50 percent.
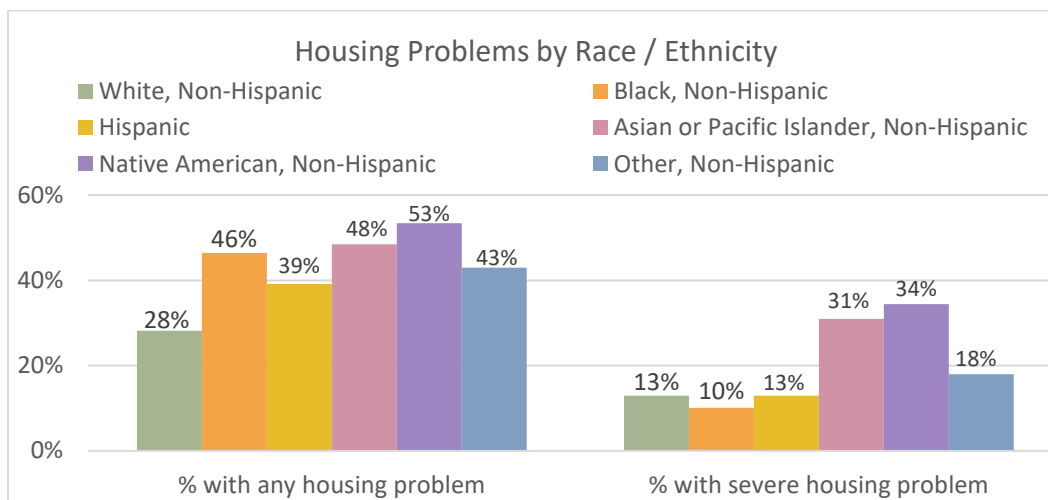
Forty-eight percent Asian households (141 of the total 291 households) are experiencing a housing problem and 31 percent (90 households) are experiencing a severe housing problem. Forty-six percent of Black, Non-Hispanic households are experiencing a housing problem; this cohort represents a total of 225 of the total 485 households in Billings. Forty-nine of these households are experiencing a severe housing problem.
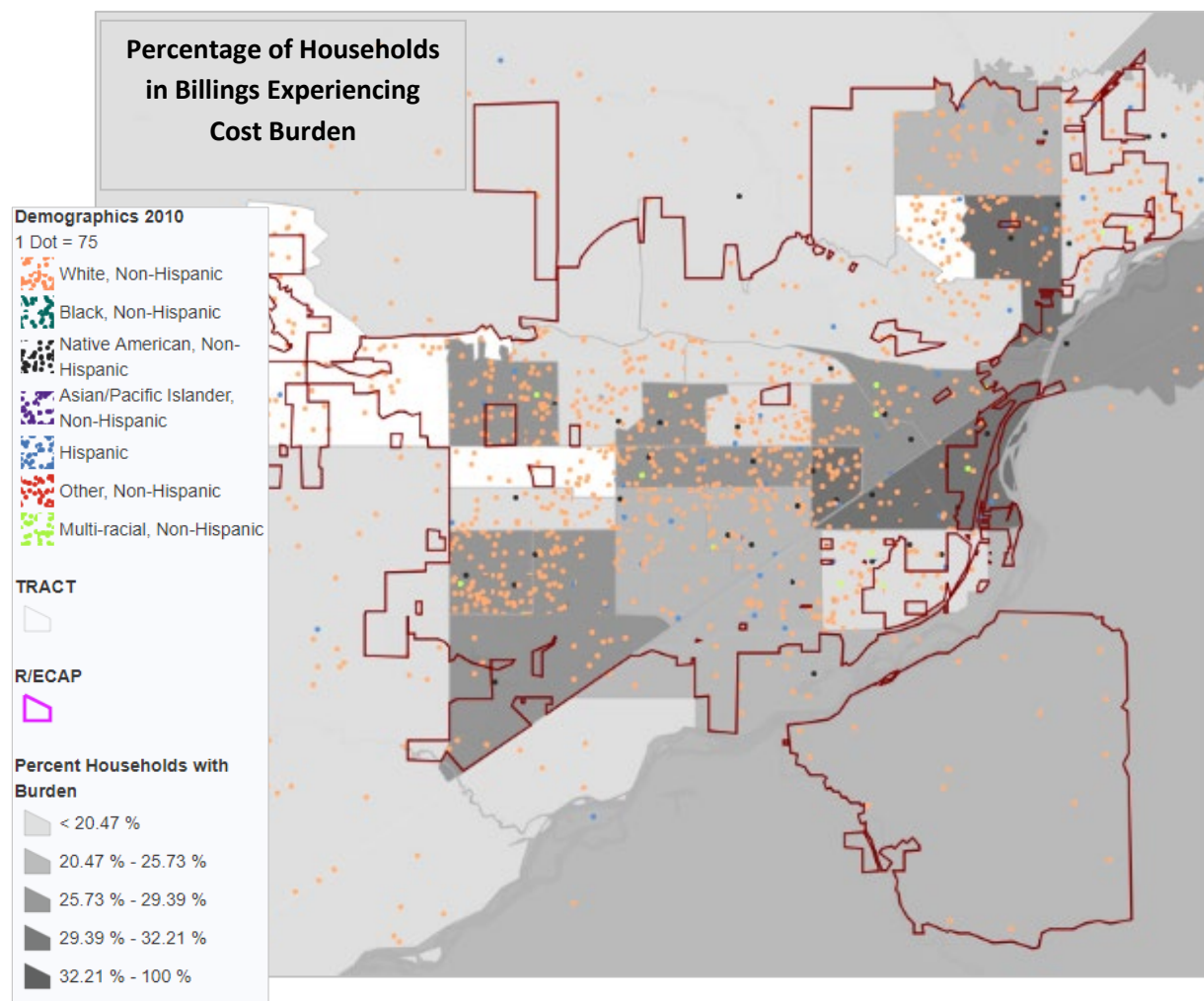
HUD Map 6, 2010

Cost Burden: According to HUD Table 10 (below), twelve percent, or 5,445 households, are severely cost burdened in Billings. Three hundred and ninety of the total 1,374 (28 percent) Native American households are described as experiencing severe cost burden (housing costs more than 50 percent of household income). Twenty-two percent of Asian / Pacific Islander households are considered cost-burdened, equating to 65 of the 291 total households.

Nineteen percent of non-family households, 3,402 of the total 17,734, are considered cost-burdened while eight and six percent of smaller (less than five people) and larger families (more than five people) are experiencing severe cost burdens.

Households with Severe Housing Cost Burden

Race / Ethnicity	# Severe Cost Burden	# Households	% Severe Cost Burden
White, Non-Hispanic	4,625	39,726	12%
Black, Non-Hispanic	55	485	11%
Hispanic	200	1,610	12%
Asian or Pacific Islander, Non-Hispanic	65	291	**22%**
Native American, Non-Hispanic	390	1,374	**28%**
Other, Non-Hispanic	110	640	**17%**
Total	**5,445**	**44,135**	**12%**
Household Type and Size	**# Severe Cost Burden**	**# Households**	**% Severe Cost Burden**
Family households, <5 people	1,878	23,459	8%
Family households, 5+ people	170	2,964	6%
Non-family households	3,402	17,734	**19%**

HUD Table 10, Data Source: CHAS

Local participants are required to use HUD-provided data, local data, and local knowledge to answer a series of questions designed to assess whether there are fair housing issues associated with the location or occupancy of publicly supported housing. The questions address the protected class characteristics of the persons and households receiving housing assistance, at both the program and development level, including comparisons with the overall population in the program participant's geographic area. The section also asks for an assessment of the areas in which the housing is located, including whether the housing is in segregated or integrated areas, R/ECAPs, or areas with disparities in access to opportunity.

Introduction

Publicly Supported Housing (PSH) is an important component to fair housing choice. PSH allows portions of a given population to have safe, affordable, stable housing and resources that the private housing market may not offer in the same way. PSH allows people to afford housing based on income, and the variety of PSH programs allows the concept to succeed in differing local economies and communities across the United States.

Metrics and Definitions

Publicly supported housing included in this analysis is divided into the following major program categories: **Public housing** was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities.

Project-Based Section 8 is any housing owned, and supervised by a Public Housing Authority (PHA) to provide housing to low income households These housing developments may be managed or partially owned by another entity but are controlled by the PHA.

The **Housing Choice Voucher Program (HCV)** is a subsection of the Section 8 Program. This program gives rental assistance to the tenants directly, which allows a tenant to move to another housing unit and still receive assistance. It can be used for home purchases as well.

The **Housing Trust Fund (HTF)** is a subsection of the Section 8 Program. This program gives rental assistance to the tenants directly, which allows a tenant to move to another housing unit and still receive assistance. It can be used for home purchases as well.

The Office of **Public and Indian Housing (PIH)** ensures safe, decent, and affordable housing, creates opportunities for residents' self-sufficiency and economic independence, and assures the fiscal integrity of all program participants.

Other Multifamily, Section 202 and Section 811 are programs for Elderly People and Disabled People respectively. Section 202 provides funds for affordable housing for the elderly. Section 811 provides non-profits with funding for Supportive Housing for disabled people. USDA also has a Rural Housing Program for rural areas under 20,000.

Supportive Housing is developed specifically to serve the needs of disabled households, and formerly homeless households. These homes often come with services that are developed to easily support these groups.

Low Income Housing Tax Credit is tax incentive administered by the IRS (Internal Revenue Service) to encourage developers to create affordable housing. The incentives are distributed to each state and each state is largely responsible for distributing each according to broad guidelines from the federal government.

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 low-income people. It is the largest Federal block grant to state and local governments designed exclusively to create affordable housing for low-income households.

Community Development Block Grant (CDBG) Program provides annual grants on a formula basis to states, cities, and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.

Tax Increment Financing (TIF) is a program that allocates future increases in property taxes from a designated area to pay for improvements only within that area.

Subsidized Housing is housing made affordable through government subsidies to either tenants or directly to landlords.

Publicly Supported Housing

According to HUD's Table 5 data, less than six percent of all housing units in Billings are publicly supported; just under 2,400 units. The majority of the units are funded through the Housing Choice Voucher program, followed by Project-Based Section 8 assistance.

Publicly Supported Housing Units by Program Category

Housing Units	#	%
Total housing units	41,939	-
Public Housing	274	0.65%
Project-Based Section 8	808*	1.93%
Other Multifamily	172	0.41%
Housing Choice Vouchers	1,124	2.68%
Total supported housing	2,378	5.67%

HUD Table 5, Montana Department of Commerce notes there are 806 units in Billings.

Housing Voucher Locations: Just under 17 percent of the housing units in the southern Heights area (Census Tract 706) are identified as being publicly assisted via housing vouchers. This is the highest concentration of units in the City. The North Elevation (Census Tract 402) and South Side neighborhoods (Census Tract 300) also have higher concentrations of housing vouchers (11 and 10 percent, respectively). Just under nine percent of the housing units in the North Park area (Census Tract 200) are housing voucher units.
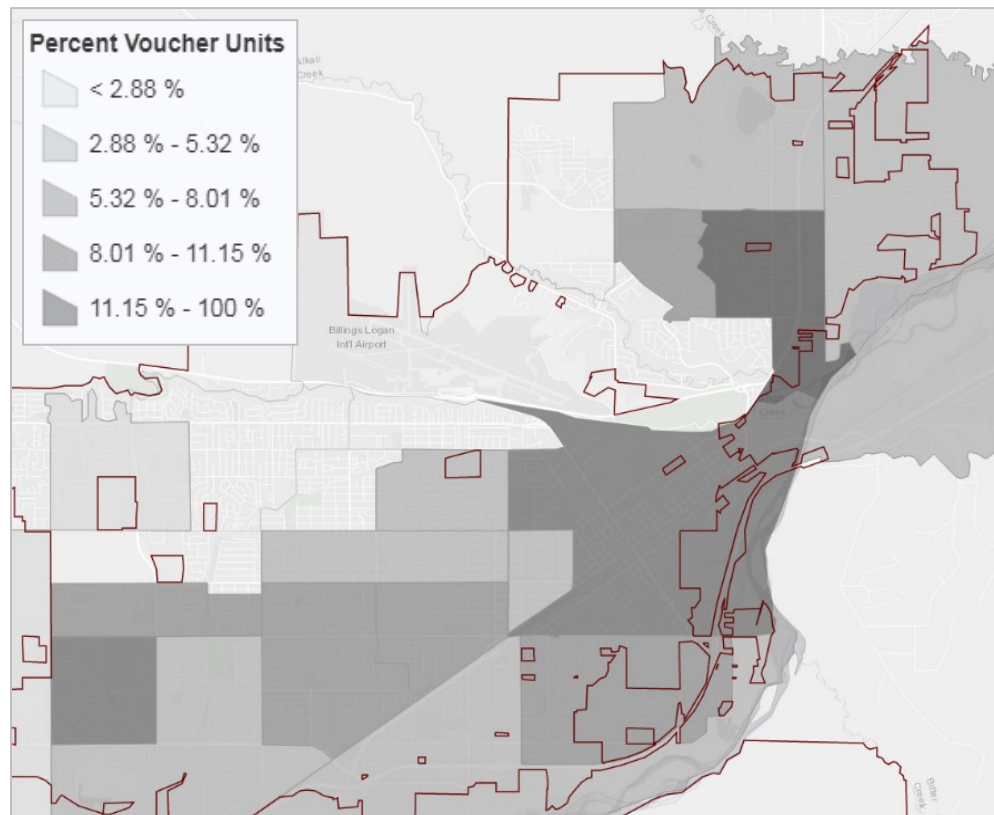
HUD Map 5 - Publicly Supported Housing Units

Publicly supported housing units are located citywide and in varied income levels and racial / ethnic concentrations. The locations of the housing developments align with the percentage of voucher units identified in each Census Tract.
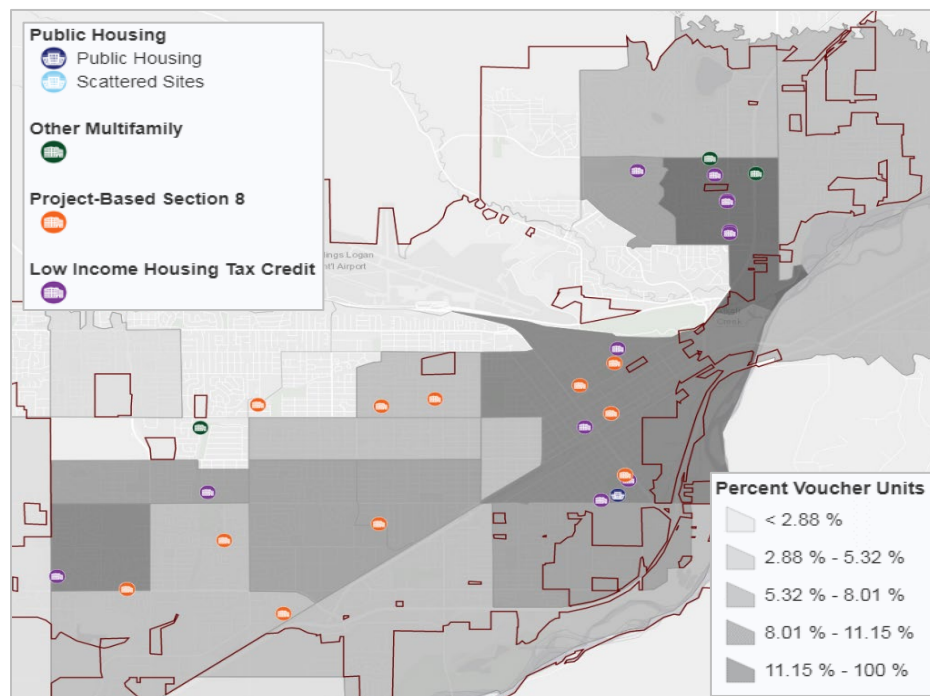
HUD Map 5 - Locations of Publicly Supported Housing

Race and Ethnicity: Over 2,200 households reside in publicly supported housing in Billings. The majority of the households, 75 percent, are White. Native Americans represent 16 percent of the overall population residing in publicly supported housing and 36 percent of the public housing units. The Hispanic population is relatively consistent across all forms over publicly supported housing, ranging from five to eight percent. A very small percentage of the total publicly supported housing residents are Black or Asian or Pacific Islander households; 63 (three percent) and 13 (one percent), respectively.

Publicly Supported Housing Residents by Race / Ethnicity

	Total by Housing Type	White		Black		Hispanic		Asian or Pacific Islander		Native American*	
		#	%	#	%	#	%	#	%	#	%
Public Housing	272	143	54%	10	4%	15	6%	5	2%	99	**36%**
Project-Based Section 8	711	638	84%	13	2%	38	5%	1	0%	81	10%
Other Multifamily	165	164	**98%**	0	0%	1	1%	0	0%	0	0%
Housing Choice Vouchers	994	698	73%	40	4%	80	8%	7	1%	169	15%
Total in Housing	2,201	1,643	75%	63	3%	134	6%	13	1%	348	**16%**

*HUD Table 6, 2010, *HUD User Dataset A New Picture of Subsidized Households*

The Other Multifamily Assisted Housing category comprises less than eight percent of the total publicly supported housing units in Billings. In this category, HUD identified the Grandview Apartments / Accessible Space, Inc. housing development along with two projects to serve the elderly. Magic City Terrace and Aspen Grove were developed by the Volunteers of America. Grandview Apartments is 91 percent White and the Volunteers of America units are 98 percent White.

Disabilities: Project-based Section 8 units have the highest percentage of disabled individuals (35 percent) followed by Housing Choice Vouchers at 29 percent. Sixteen percent of the residents in Multifamily Assisted Housing are disabled. This category refers to three projects in Billings, two of which are occupied by elderly persons and one is occupied by disabled citizens.

People with a Disability in Publicly Supported Housing in Billings, MT

HOUSING TYPE	#	%
Public Housing	34	13%
Project-Based Section 8	274	35%
Other Multifamily	27	16%
Housing Choice Vouchers	291	29%

HUD Table 15, 2010

Public Housing Authority Review

The Housing Authority of Billings manages 274 housing units in scattered developments across the City and they own 58 single-family homes. The multi-family units have less than 40 apartments in each development. The organization manages 1,152 Housing Choice Vouchers and provides assistance to over 1,100 families including 950 children. The Housing Authority also manages over 100 apartment homes to serve the elderly and / or disabled with Project-Based Section 8 vouchers at the Pleasantview Apartments.

Race and Ethnicity: The Housing Authority of Billings serves an average of over 700 households and over 2,700 individuals through voucher programs (2013 through 2017). Ninety percent of those served are White, 10 percent are racial minorities and 10 percent are ethnic minorities.
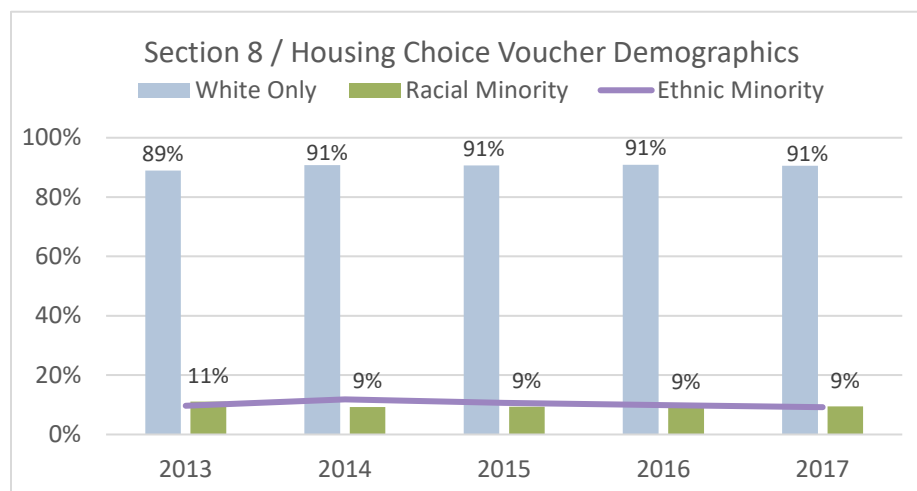
From 2013 through 2017, the Housing Authority's public housing program served an average of 300 households representing an average of 773 household members. On average, 87 percent are White, 13 percent are racial minorities and seven percent are ethnic minorities.

Public Housing Demographics
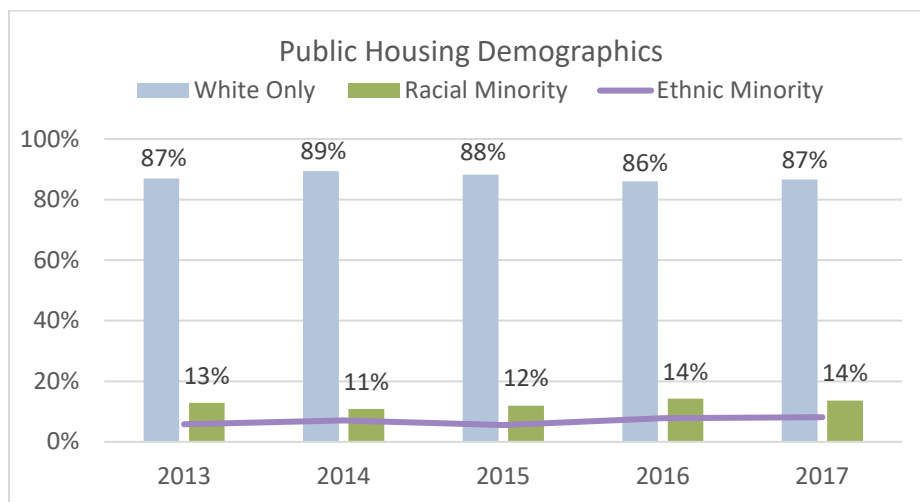
Age: Over half of the total household adult members served in the voucher program are ages 25 to 54 while 35 percent are between the ages 55 to 74. Eight percent are at least 75 years of age. In the public housing program, over 75 percent of the total household adult members are between the ages of 51 and 61 years. Twenty percent are between the ages of 62 and 82, and two percent are at least 83 years of age.

Housing Authority of Billings
Section 8 / Housing Choice Voucher
Average Age - 2013 through 2017

Housing Authority of Billings
Public Housing - Average Age
2013 through 2017
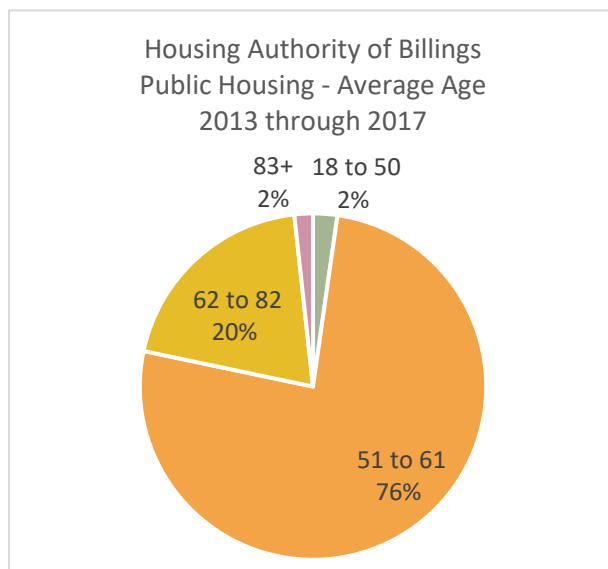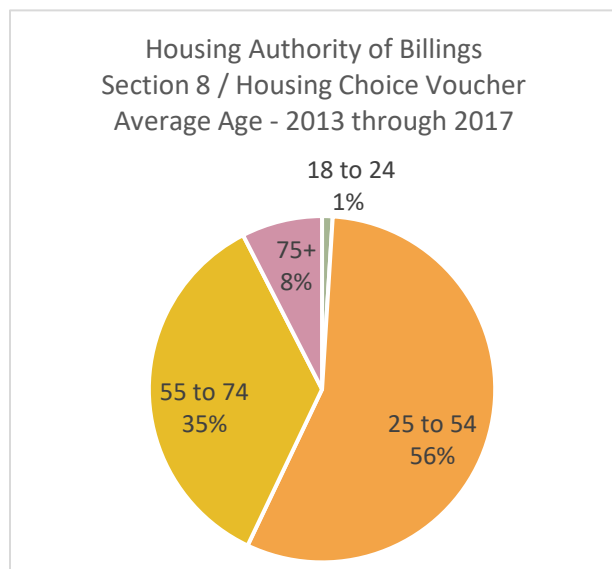
Households with Children, Elderly, Handicapped, and Disabled: The percentage of voucher households identified as disabled has remained fairly consistent and averages 50 percent. Nearly 30 percent of the households have children. The percentage of households identified as elderly and handicapped has dropped slightly from 2013 to 2017, indicating the potential for a downward long-term trend.

Housing Authority of Billings
Section 8 / Housing Choice Voucher

Legend: 2013 2014 2015 2016 2017 Average

Households with Children: 29%
Elderly: 27%
Handicapped: 14%
Disabled: 50%
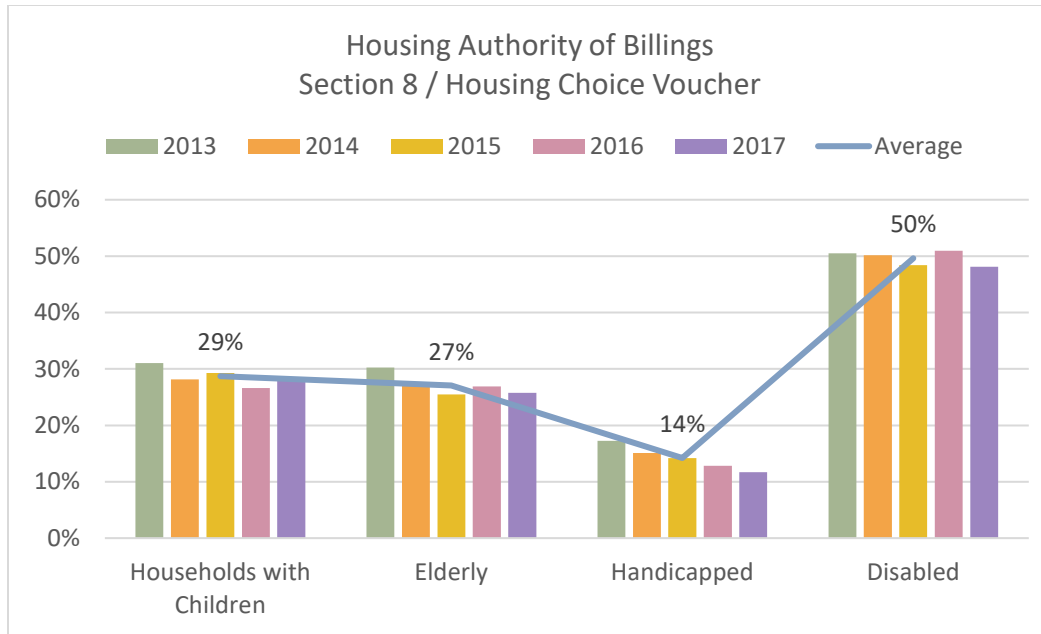
The majority of the households in public housing have children and the average percentage of households identified as disabled has fluctuated between 24 and 28 percent. The average percentage of households identified as elderly and handicapped have remained level at approximately 11 and eight percent, respectively.

Housing Authority of Billings
Public Housing

Legend: 2013 2014 2015 2016 2017 Average

Households with Children: 61%
Elderly: 11%
Handicapped: 8%
Disabled: 26%
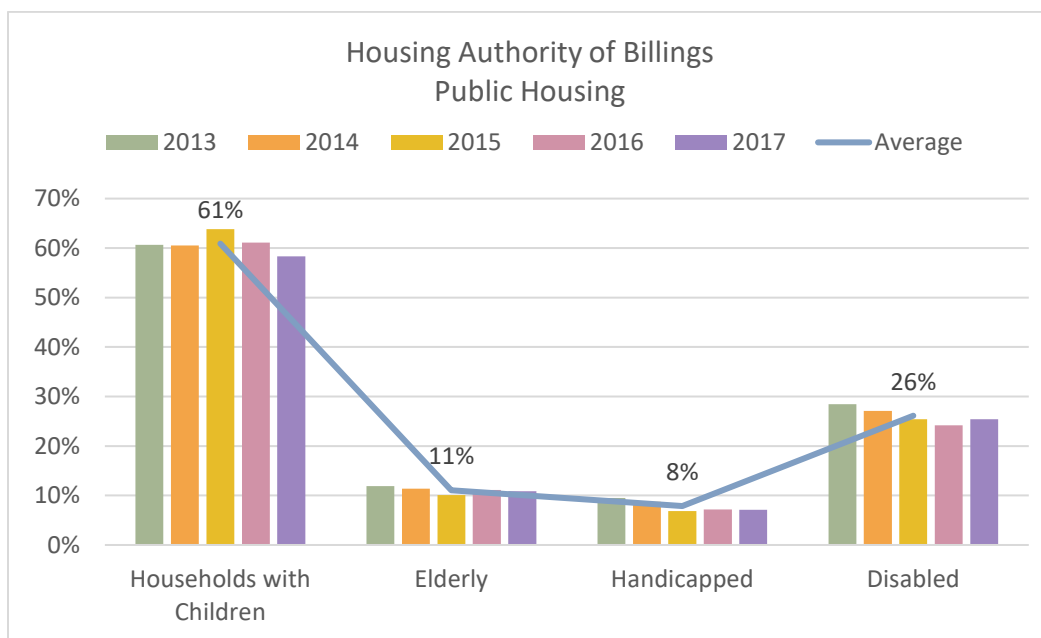
Analyze education, employment and transportation opportunities in the participating entitlements and statewide.

Introduction

This subsection analyzes disparities in access to education, employment and transportation opportunities. This content analyzes how a person's place of residence, locations of different opportunities, and related policies contribute to fair housing issues based on protected class. HUD has provided data for some protected class groups including opportunities indices by race and ethnicity, national origin and familial status. This is supplemented with local data and knowledge. This section best encompasses how this assessment to fair housing is not "just housing" but rather a more complex analysis of intertwined factors.

Metrics

School Proficiency Index (SPI) uses data from 4th grade student state exams to determine which neighborhoods have access to high-performing elementary schools and which neighborhoods do not. Values are percentile ranked and range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.

Low Poverty Index (LPI) is an index that captures poverty in a given neighborhood by ranking them between 0 and 100. The higher the score, the less exposure to poverty in a neighborhood.

Labor Engagement Index (LEI) measures the intensity of the labor market in terms of level of employment (measured by unemployment rate), labor force participation rate, and educational attainment (measured by college education or higher) in a neighborhood. The higher the value in this index, the higher participation and human capital for labor in a neighborhood.

Job Proximity Index (JPI) looks at the accessibility of a neighborhood for all jobs. The greater the concentration of jobs in an area, the higher the values for this index. The JPI does not consider the quality of jobs within an area. A low skilled and low wage job counts the same as a high skilled and high wage job.

Labor Market Index (LMI) combines measures of employment, labor market participation, and educational attainment.

Low Transportation Cost Index (LTCI) measures the cost to households of all transportation, including private automobile. LTCI is based on the transportation costs for a 3-person, single-parent family at 50% median income for renters in the region. The higher transportation cost, the lower the transportation cost index value will be. Transportation costs in an area are affected by factors like availability of public transit, density of the neighborhood, and job or amenity proximity.

Education

At first glance, the data in HUD's Map 7 - School Proficiency Index Based on Race and Ethnicity, minorities appear to reside across the City and have access to the most proficient schools in Billings.
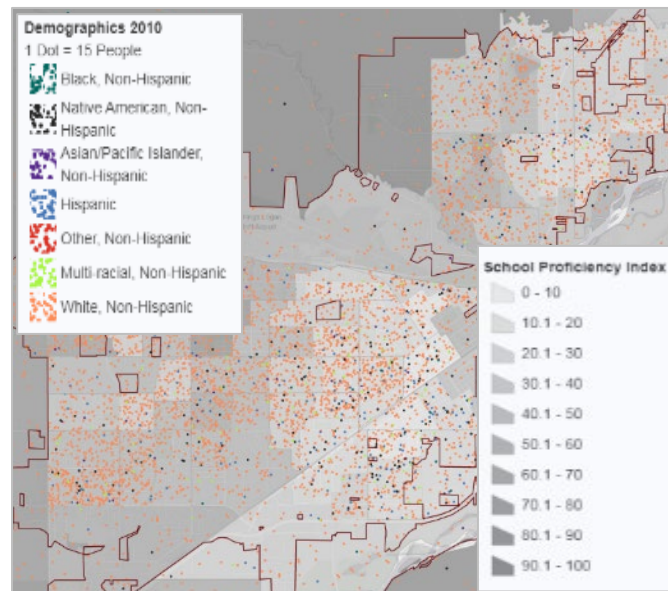
HUD Map 7, 2010

If the White population is removed from HUD's mapping system, several areas of minority concentrations become more apparent, although index scores relative to these concentrations are not consistent across the City. In the Billings Heights area, Census tract 7.05 has a School Proficiency Index score of 67 and appears to contain a higher minority concentration. On the West End: Census Tract 17.03 has a School Proficiency Index Score of 46; 18.02 has a score of 77; and 13.00 has a score of 73. On the South Side: Census Tract 9.02 has a School Proficiency Score of five and 14 for Block groups two and three, respectively.
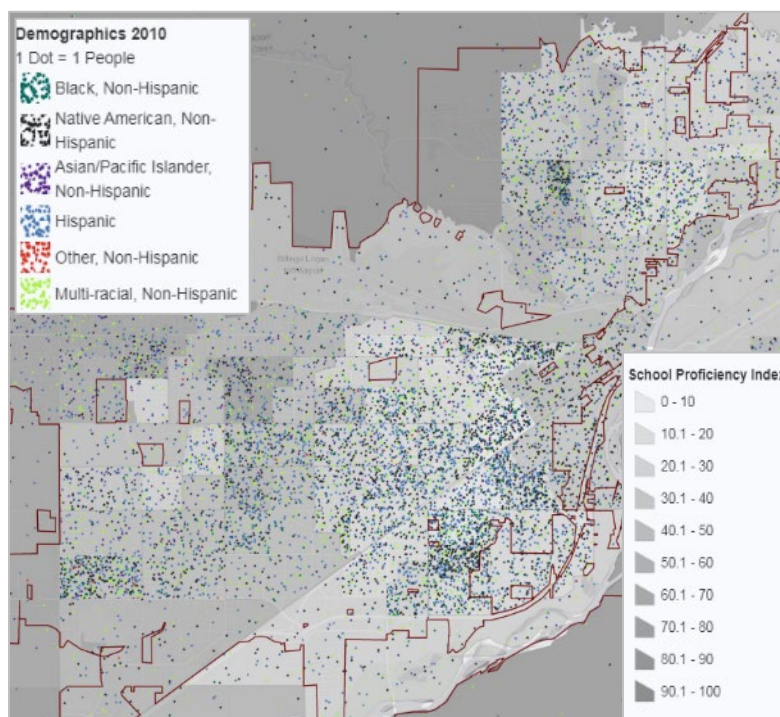
When reviewing the Growth and Enhancement of Montana Students website, data indicates disproportionate success of racial / ethnic groups in meeting or exceeding educational standards in Billings' elementary schools.

Percent of Students Meeting / Exceeding Standards - English Language Arts

Grades	3rd	4th	5th	6th	7th	8th	Average
All Students	37.75%	40.59%	48.94%	42.42%	42.39%	40.38%	42%
American Indian/Alaskan Native	17.65%	18.99%	25.76%	22.09%	21.88%	19.18%	21%
White	42.78%	45.01%	53.80%	45.81%	46.52%	45.62%	47%
Hispanic	18.28%	22.02%	33.06%	33.33%	28.00%	20.79%	26%
Multi-Racial	29.59%	39.66%	42.96%	41.13%	35.71%	29.59%	36%
Students Eligible for Free or Reduced Lunch	24.02%	26.79%	35.28%	27.32%	28.18%	27.15%	28%

Data for Asian, Black / African American, Native Hawaiian / Pacific Islander, and Migrant Program students is unavailable.

Percent of Students Meeting / Exceeding Standards - Mathematics

Grades	3rd	4th	5th	6th	7th	8th	Average
All Students	49.06%	46.71%	42.49%	35.57%	35.74%	34.19%	41%
American Indian/Alaskan Native	27.00%	26.92%	18.18%	11.63%	-	15.28%	20%
White	55.54%	51.41%	47.38%	40.37%	39.76%	38.47%	46%
Hispanic	26.60%	31.48%	28.93%	22.22%	22.40%	19.80%	25%
Multi-Racial	34.69%	39.66%	35.07%	32.52%	27.84%	24.49%	32%
Students Eligible for Free or Reduced Lunch	35.28%	34.21%	29.38%	21.23%	21.41%	20.65%	27%

Data for Asian, Black / African American, Native Hawaiian / Pacific Islander, and Migrant Program students is unavailable.

The percentage of low income students (eligible for free / reduced lunch) meeting or exceeding educational standards is significantly lower than the overall student population in both English Language Arts and Mathematics. Likewise, minority students, including those identified as American Indian, Hispanic, or Multi-Racial are also less successful in meeting or exceeding educational standards.

Opportunity360 has made a mapping system available utilizing Census and American Community Survey data to illustrate various levels of opportunity. The Education Outcome Index includes the share of people aged 25 and older with at least a High School Diploma, some college, Associate's Degree, or a Bachelor's degree or higher level of education (American Community Survey, 2017 five-year data). According to this mapping system, residents in northwestern Billings have the highest level of education achieved while those residing in the Southwest Corridor have the lowest index scores.

Education Outcome Index - Opportunity360

National Percentile Score
- Insufficient Data
- 20 or less
- 21 - 40
- 41 - 60
- 61 - 80
- 81 or more

Source: Calculated Value
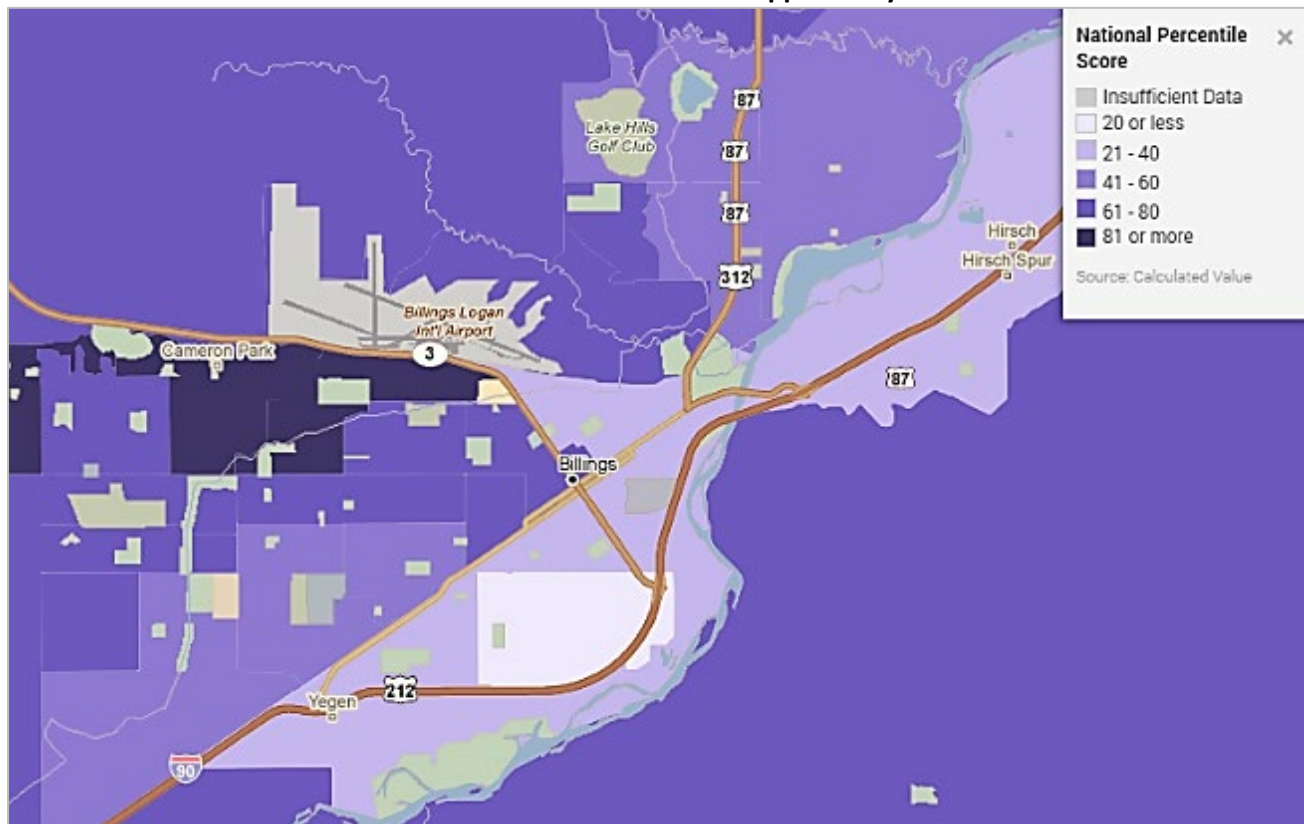
Employment

According to the HUD map below, the Jobs Proximity Index indicates a wide range of accessibility for employment opportunities in Billings. There are several areas in Billings with lower index scores including the Billings Heights, a small area the Southwest Corridor, and a few areas in the Billings West End.
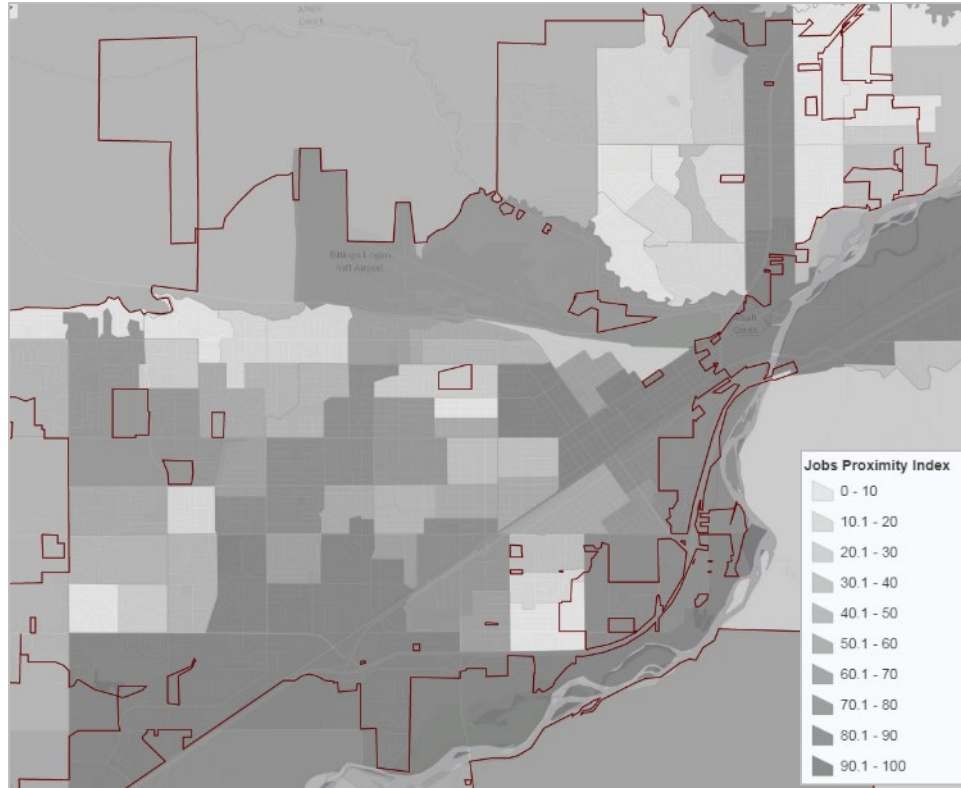
HUD Map 8, 2010

HUD data indicates the Labor Market Index (employment, labor market participation and educational attainment) for the total Billings population over 57 for all racial / ethnic groups in Billings and is the highest for both the Asian and White cohorts.
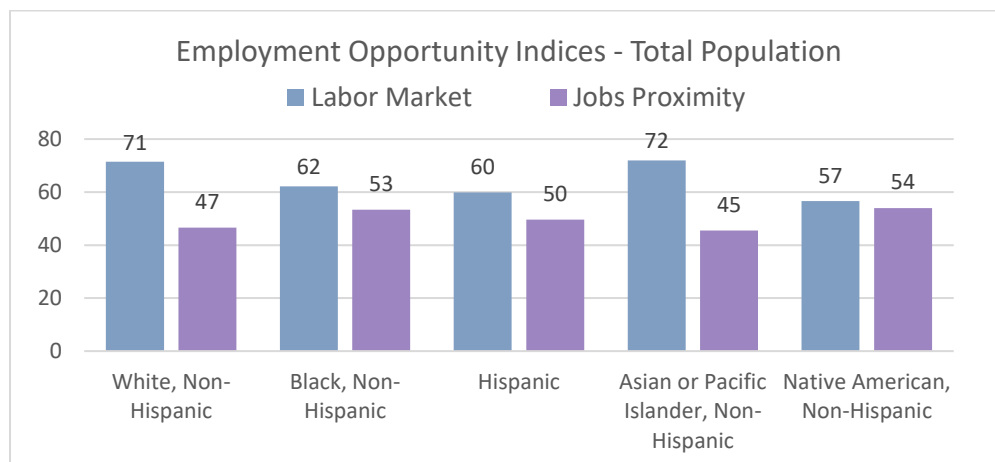
Jobs proximity index scores range from 45 to 54 for the total population and all races / ethnicities in Billings; the Asian group has the lowest index score and the Black population has the highest index score at 53.

According to Opportunity360, the accessibility of jobs, goods and services is fairly consistent across the City. The majority of Billings maintains a score between 39 and 59 of the national percentile. The outer areas in Billings score between 19 and 38 of the national percentile. The central area of Billings along South 27th Street from the airport to the railroad tracks downtown has the lowest accessibility score relative to jobs, goods and services. The data utilized for this map may not represent the most recent construction of businesses and services along South 27th Street.

Accessibility of Jobs, Goods and Services Index - Opportunity360

Employment by Industry in Billings
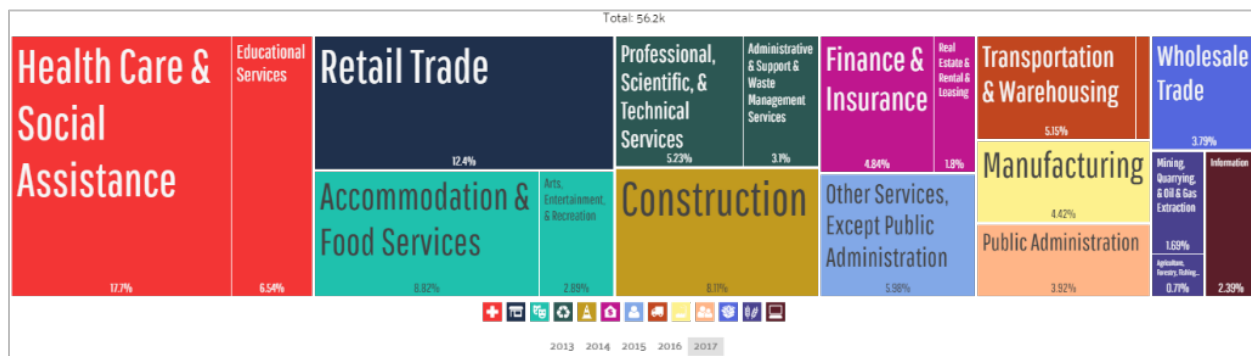
Data USA, 2017

Transportation

Access to transportation is linked to fair housing choice. Where one lives limits or expands transportation options. Access to sustainable transportation such as public transportation can contribute to healthier communities, financial health, and increased mobility.

Metrics

A **Walk Score** measures the walkability of any address based on the distance to nearby places and pedestrian friendliness. For each address, Walk Score analyzes hundreds of walking routes to nearby amenities. Points are awarded based on the distance to amenities in each category. Amenities within a 5 minute walk (.25 miles) are given maximum points. A decay function is used to give points to more distant amenities, with no points given after a 30 minute walk. Walk Score also measures pedestrian friendliness by analyzing population density and road metrics such as block length and intersection density. Data sources include Google, Factual, Great Schools, Open Street Map, the U.S. Census, Localeze, and places added by the Walk Score user community. See the table below to observe the Walk Score brackets and their implications:

Walk Score	Description
90-100	Walker's Paradise: daily errands do not require a car.
70-89	Very Walkable: most errands can be accomplished on foot.
50-69	Somewhat Walkable: some errands can be accomplished on foot.
25-49	Car-Dependent: most errands require a car.
0-24	Car-Dependent: almost all errands require a car.

Walk Score, 2019

A **Bike Score** measures whether an area is good for biking based on bike lanes and trails, hills, road connectivity, and destinations. These component scores are based on data from the USGS, Open Street Map, and the U.S. Census.

Bike Score	Description
90-100	Biker's Paradise: daily errands can be accomplished on a bike.
70-89	Very Bikeable: biking is convenient for most trips.
50-69	Somewhat Bikeable: some bike infrastructure.
0-49	Somewhat Bikeable: minimal bike infrastructure.

Walk Score, 2019

A **Transit Score** measures how well a location is served by public transit based on the distance and type of nearby transit lines. This score is a patented measure of how well a location is served by public transit. Transit Score is based on data released in a standard format by public transit agencies. To calculate a Transit Score, we assign a "usefulness" value to nearby transit routes based on the frequency, type of route (rail, bus, etc.), and distance to the nearest stop on the route. The "usefulness" of all nearby routes is summed and normalized to a score between 0 - 100.

Transit Score	Description
90-100	Rider's Paradise: world-class public transportation.
70-89	Excellent Transit: biking is convenient for most trips.
50-69	Good Transit: many nearby public transportation options.
25-49	Some Transit: a few nearby public transportation options.
0-24	Minimal Transit: it is possible to get on a bus.

Walk Score, 2019

According to WalkScore.com, the City of Billings has an average Walk Score of 35 citywide, although many neighborhoods and areas have much higher scores. The city website has resources for travelling on foot, such as the benefits of walking and safety tips. Billings City Code addresses keeping sidewalks clear and accessible in multiple sections. Section 22-406 requires property owners and/or tenants to remove snow, ice and slush from the sidewalk within 24 hours of the snow event. Additional Billings City Code Sections addressing sidewalk obstructions can be viewed online.

Billings' Bike Score is 43 which indicates most errands would require a vehicle. However, Billings was chosen as the Best Town of 2016 by Outside Magazine due, in part, to its designation as a bicycle-friendly community. Billings has approximately 50 miles of multi-use trails, nearly 25 miles of on-street bike lanes, and over 60 parks throughout the City. The Billings Bikeways & Trails Tour Map illustrates a comprehensive system of bike lanes and multi-use trails citywide. The City of Billings has several resources for cyclists, including multiple Bicycle User Groups intended for seniors, students, women and more.

WalkScore.com does not have a transit score recorded for Billings, however the City has the Metropolitan Transit System (MET). The MET has 17 fixed routes that cover approximately 43.52 square miles. The MET serves about 110,000 Billings residents, generating an average of 1,976 trips each weekday. MET Plus is a paratransit program that provides curb-to-curb services for those with disabilities.

Several low income areas have high walk and bike scores including North Elevation, North Park, and the South Side. The North Elevation neighborhood is the most walkable neighborhood in the city with an estimated 1,246 residents. Two major hospitals, museums, Pioneer Park, and Daylis Stadium are all located in this neighborhood. North Elevation has a Walk Score of 73 / Very Walkable and a Bike Score of 66 / Very Bikeable.

The North Park neighborhood is the second most walkable neighborhood in Billings and includes 4,155 residents. North Park's Walk Score is 60 indicating that some errands can be accomplished on foot. The North Park neighborhood includes two parks, museums, and a variety of markets and services along North 27th Street. The North Park neighborhood has a Bike Score of 56 indicating that the area is somewhat bikeable.

There are over 4,300 residents in the South Side neighborhood. The Walk Score is 55 and the Bike Score is 63 indicating the neighborhood is somewhat walkable and bikeable. The South Side includes two parks and some services, including access to healthcare through RiverStone Health.

Billings TrailNet is a nonprofit organization that supports the development of urban trails in and around the Billings community. The organization undertakes fundraising initiatives and has raised $550,000 to support trail-building throughout the City.

Introduction

Efforts to garner survey data to prepare for the Analysis of Impediments to Fair Housing Choice began in 2018. Five years of HUD complaint data have been analyzed along with data received via the Fair Housing Community Survey. Surveys are available by request and charts are available in the appendices.

HUD Complaint Data – 2013 through 2017

The most significant issues identified in recent HUD fair housing complaint data for the State of Montana are as follows:

- Thirty percent of all discrimination cases were filed by Montana Fair Housing (17 out of 56 cases without "no cause determination" status).

- The predominant basis for filing was disability.

- Sixteen percent of all disability cases include retaliation.

- The most significant issues:
  - Failure to make reasonable accommodation
  - Terms / conditions / privileges or services / facilities
  - Advertising, statements, and notices
  - Otherwise deny or make housing unavailable

Approximately 18% of all cases filed were closed due to a "No cause" or "Lack of jurisdiction" and the majority of cases (75%) were closed following conciliation, settlement, or resolution.

Montana Fair Housing Community Survey Data - 2018

Findings primarily relate to the State of Montana respondents and many are similar to the findings for the City of Billings. If differences between the State of Montana and Billings exist, they are noted below:

- Over half of respondents are housing cost-burdened (53% Montana citizens paying over 30%, 59% in Billings).

- Nearly 60% of respondents have experienced housing cost increases over the past five years (57% in Billings).
  - Of those who are paying more, property taxes are the primary reason.

- The majority of respondents are residing in a single-family home.

- The majority of respondents do not receive housing assistance (90%).

- The most significant factor for rental housing choice is affordability, followed by unit size and required deposit in second position. This is followed by neighborhood, then credit score.

- The most significant factor for homeownership housing choice is affordability, followed by home size, and then neighborhood.

- Thirty-six percent of respondents witnessed housing discrimination and 50% have not (37% have and 46% have not in Billings). 13% do not know if they have witnessed housing discrimination (16% in Billings).

- Income is the primary reason cited for housing discrimination, followed by race, criminal background, then source of income (Billings – income, race, familial status, criminal background).

- Rental owners / managers are cited as the primary person / organization engaging in discriminatory behavior.

- Montana Fair Housing is the primary contact for respondents who have experienced or witnessed housing discrimination; 171 respondents would not know who to contact (Billings – 26 would not know who to contact).

- One hundred and sixteen Montana respondents indicate they know someone who was refused a rental or sale agreement to obtain housing (23 in Billings).

- The availability of grocery stores, parks, banks, and housing conditions are the top neighborhood amenities noted by survey respondents (Billings – grocery stores, banks, pharmacy and housing conditions tie for third).

- Respondents note lowest availability of neighborhood lighting, libraries, jobs, and public transit.

- Increased housing rent / payments is cited as the most significant factor in worsening housing choice or situation followed by crime, job loss, and extreme weather.

- Most respondents did not indicate needing housing support. Respondents go to family and friends most often, followed by government agencies or programs, nonprofit organizations, and then church or faith-based groups.

- The majority of respondents are either not familiar or somewhat familiar with fair housing laws (85% in Montana, 87% in Billings).

- The majority of respondents are White (86%); 13% are minorities (Billings - 82% White, 18% minorities).

- Nearly all of the respondents speak English.

- Twenty-two percent indicate someone in their household has a disability (35% in Billings).

- The majority of respondents have attended college (89%); 35% have a bachelor's degree, 27% have a graduate degree (Billings – 85% attended college, 24% have a bachelor's degree, 21% have a graduate degree).

HUD Discrimination Complaint Data

Cases Open / Closed by Year

■ Opened ■ Closed

Year	Opened	Closed
2013	15	8
2014	9	9
2015	16	14
2016	13	13
2017	16	11

Closure Reason - 69 Cases

Reason	Count
Conciliation/settlement successful	38
No cause determination	10
No reason noted	5
Withdrawn by complainant after resolution	4
Withdrawn by complainant w/o resolution	4
Complainant failed to cooperate	4
Dismissed for lack of jurisdiction	3
Election made to go to court	1

Closure Reason - 69 Cases

Category	Percentage
Settled	56%
No Cause	14%
No Reason	7%
No Cooperation	6%
Withdrawn w/o resolution	6%
Withdrawn w/ resolution	6%
Dismissed	4%
Court	1%

Cases by City / Town
69 Cases

City / Town	Cases
Billings	13
Missoula	9
Kalispell	7
Helena / East Helena	7
Bozeman	5
Libby	4
Havre	4
Butte	3
Livingston	2
Hamilton	2
Great Falls	2
Cut Bank	2
Big Sky	2
Stevensville	1
Ronan	1
Lolo	1
Hardin	1
Darby	1
Clancy	1
Belgrade	1
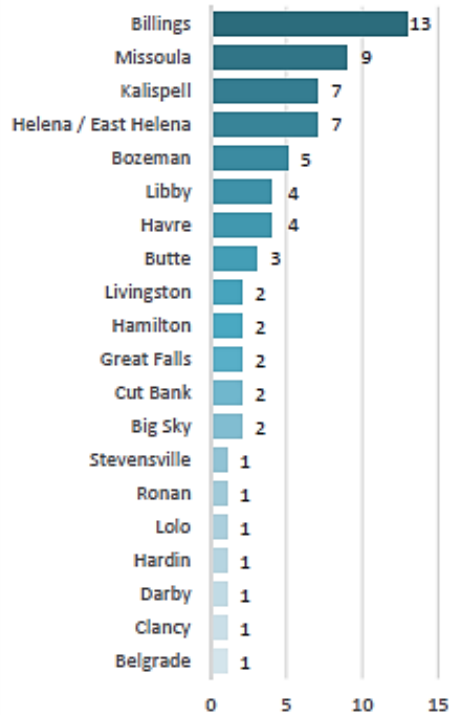
Cases by City / Town
56 Cases

City / Town	Cases
Billings	11
Missoula	9
Helena / East Helena	6
Kalispell	5
Bozeman	5
Havre	4
Butte	3
Libby	2
Big Sky	2
Stevensville	1
Lolo	1
Livingston	1
Hardin	1
Hamilton	1
Great Falls	1
Darby	1
Cut Bank	1
Clancy	1
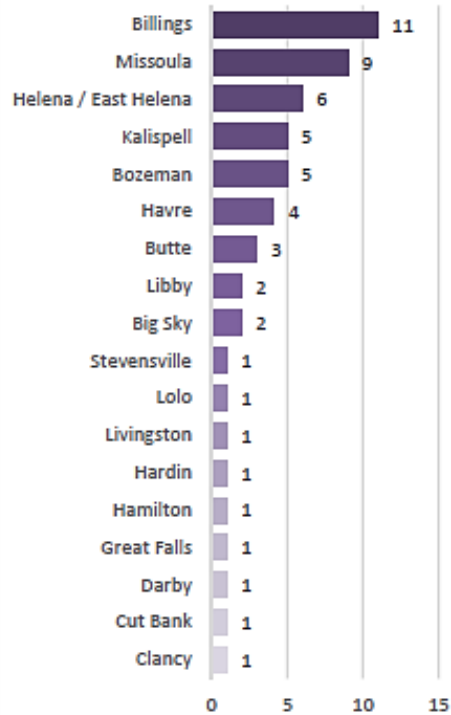
Cases by County
69 Cases

County	Cases
Yellowstone	13
Missoula	10
Gallatin	8
Lewis & Clark	7
Flathead	7
Ravalli	4
Lincoln	4
Hill	4
Silver Bow	3
Park	2
Lake	2
Glacier	2
Cascade	2
Jefferson	1
Big Horn	1
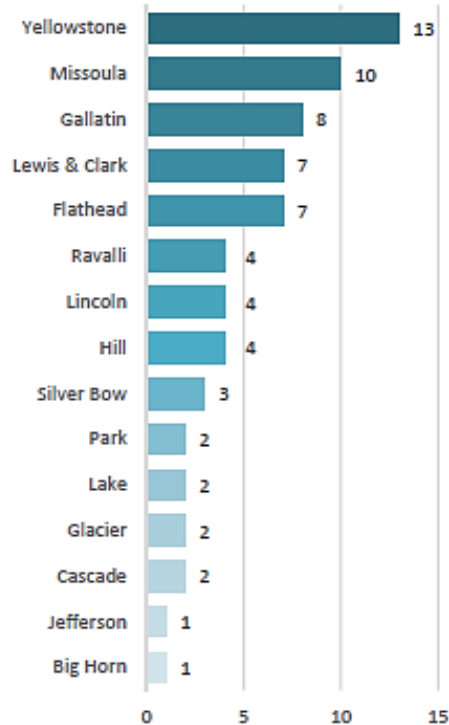
Cases by County
56 Cases

County	Cases
Yellowstone	11
Missoula	10
Gallatin	7
Lewis & Clark	6
Flathead	5
Hill	4
Silver Bow	3
Ravalli	3
Lincoln	2
Park	1
Jefferson	1
Glacier	1
Cascade	1
Big Horn	1
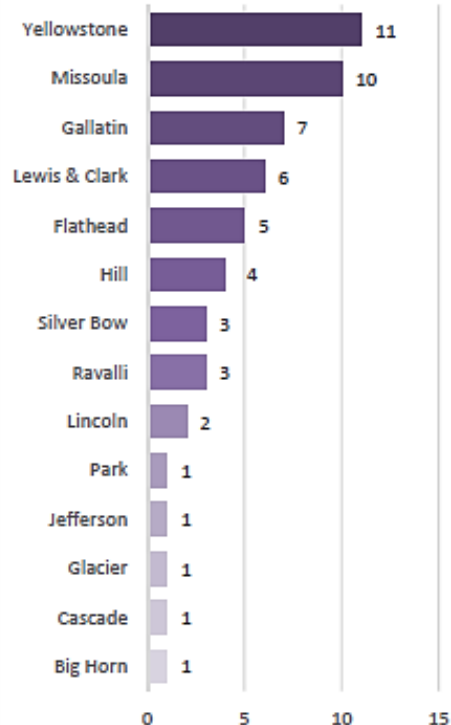
Counties with at least three complaints, complaint rate (one case per # people).

One Case Filed per # People, per County
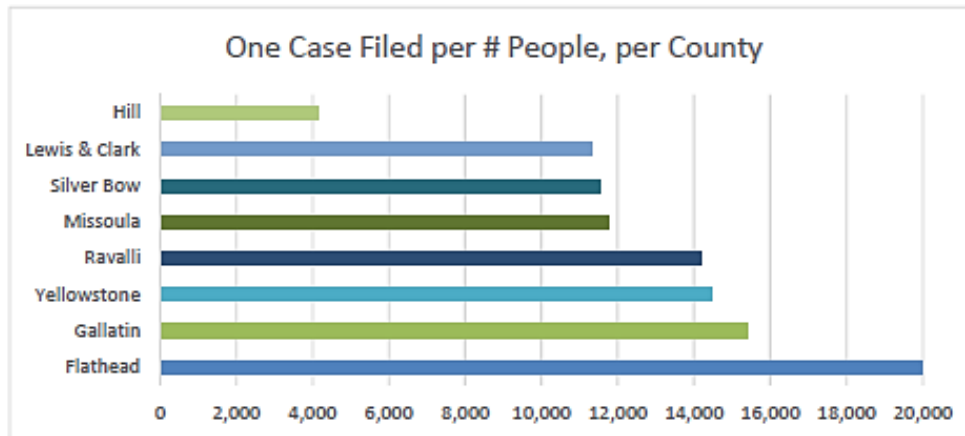
County	# Cases	Population	Complaint Rate
Hill	4	16,463	4,116
Lewis & Clark	6	67,773	11,296
Silver Bow	3	34,602	11,534
Missoula	10	117,441	11,744
Ravalli	3	42,563	14,188
Yellowstone	11	158,980	14,453
Gallatin	7	107,810	15,401
Flathead	5	100,000	20,000

Excluding "No cause determination" and "Dismissed for lack of jurisdiction" cases (13 total, 18%)

Basis - 56 Cases

Basis - Separating Disability & Retaliation - 56 Cases

16 % of all disability cases include retaliation.

Issues - 56 Cases

Issue	Count
Failure to make reasonable accommodation	32
Terms / conditions / privileges or services / facilities	30
Advertising, statements & notices	28
Otherwise deny or make housing unavailable	22
Discriminatory acts under Section 818 (coercion, etc.)	14
Terms / conditions / privileges relating to rental	14
Refusal to rent	13
Failure to permit reasonable modification	2
Steering	2
Refusal to rent & negotiate for rental	2
Discriminatory acts under Section 901 (criminal)	1
Failure to provide accessible route into / through covered unit	1
Failure to provide usable doors	1
Failure to provide accessible / usable public / common user areas	1
Failure to provide accessible building entrance	1
Noncompliance with design / construction requirements	1
False denial / representation of availability - rental	1

(All one case — bracket spanning the last six entries above False denial)

Issues - Eliminating Construction Case - 56 Cases

Issue	Count
Failure to make reasonable accommodation	32
Terms / conditions / privileges or services / facilities	30
Advertising, statements & notices	28
Otherwise deny or make housing unavailable	22
Discriminatory acts under Section 818 (coercion, etc.)	14
Terms / conditions / privileges relating to rental	14
Refusal to rent	13
Failure to permit reasonable modification	2
Steering	2
Refusal to rent & negotiate for rental	2
Discriminatory acts under Section 901 (criminal)	1
False denial / representation of availability - rental	1

Closure Reason - 56 Cases

Closure Reason	Count
Conciliation/settlement successful	38
No reason noted	5
Withdrawn by complainant after resolution	4
Withdrawn by complainant w/o resolution	4
Complainant failed to cooperate	4
Election made to go to court	1

Closure Reason - 56 Cases

Category	Percent
Settled	68%
No Reason	9%
No Cooperation	7%
Withdrawn w/o resolution	7%
Withdrawn w/ resolution	7%
Court	2%

Combining "Conciliation / settlement successful" and "Complaint withdrawn...after resolution"

Closure Reason - 56 Cases

Closure Reason	Count
Conciliation/settlement/resolution	42
No reason noted	5
Withdrawn by complainant w/o resolution	4
Complainant failed to cooperate	4
Election made to go to court	1

Closure Reason - 56 Cases

- Withdrawn w/o resolution 7%
- Court 2%
- No Cooperation 7%
- No Reason 9%
- Settled / Resolved 75%

Fair Housing Community Survey Responses – City of Billings

December 19, 2018   113 Respondents

Based on your monthly income before taxes, how much of your monthly income do you spend on housing?

Monthly Income

- No Response 0%
- More than 50 percent 9%
- Less than 30 percent 41%
- Between 30-50 percent 50%
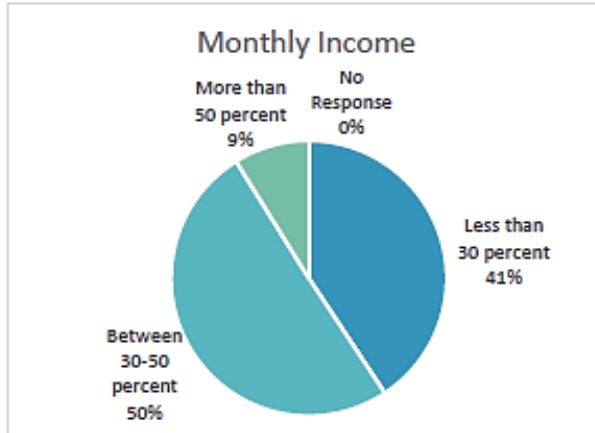
Has your housing cost changed in the past 5 years?

Change in Housing Cost

- No Response 0%
- Same 33%
- More 57%
- Less 10%
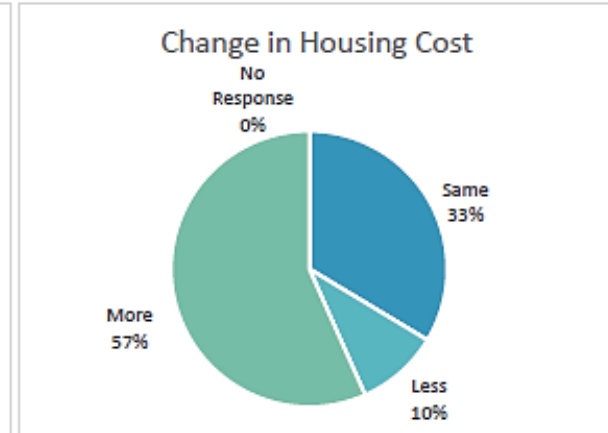
What caused the change in your housing cost?

Reasons Housing Cost Changed

- Change in housing needs: 17
- Property tax change: 36
- Landlord increased/decreased cost of rent: 17
- Moved to higher/lower priced area: 26
- Change in household size: 17
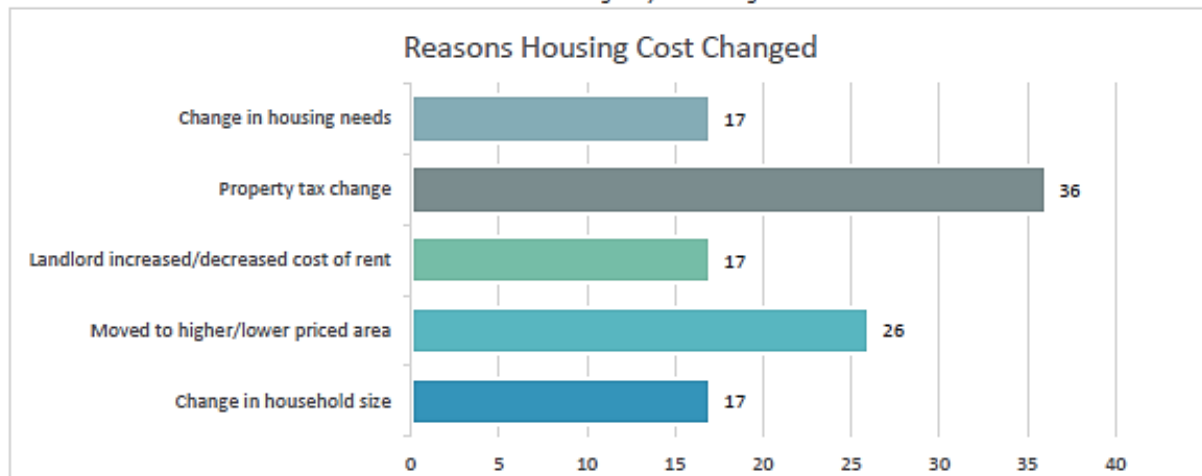
What type of housing do you currently live in?

Current Residence

- Condo: 3
- Manufactured Home/Mobile Home: 5
- Duplex: 11
- Apartment with 5+ units: 11
- Apartment with 1-5 units: 9
- Single Family Home: 71
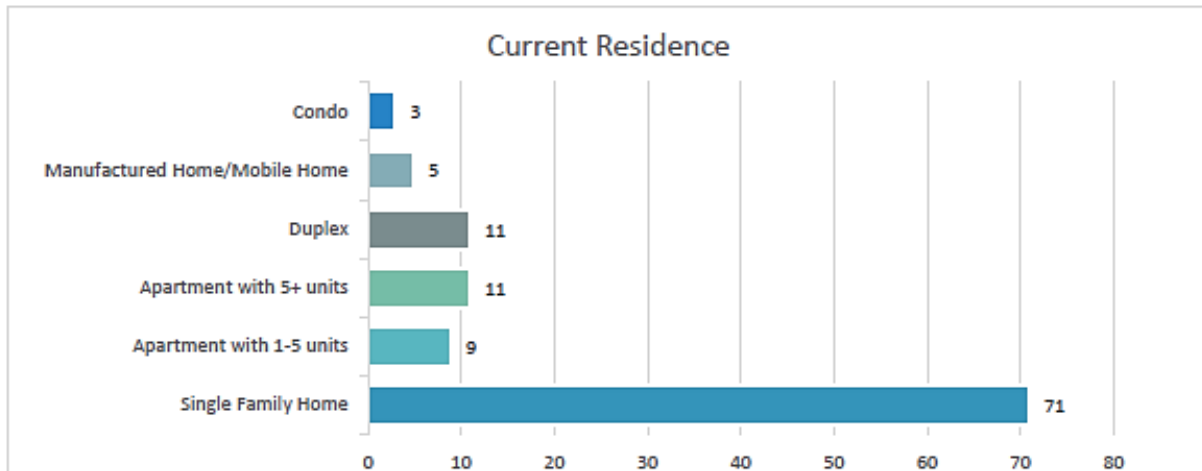
What is your current housing situation?

Current Housing Situation

Category	Value
Live with a family member or friend	6
Rent from a Housing Authority	15
Rent from a Private Landlord	32
Own	55
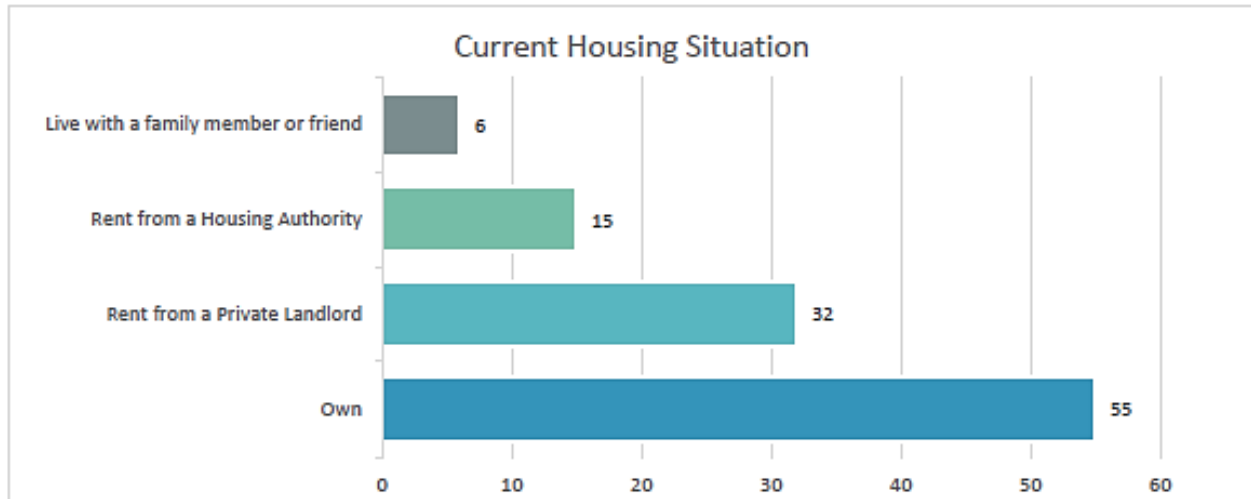
Do you receive housing assistance? If so please explain the type of assistance.

Housing Assistance

Category	Value
Not Applicable	92
Non-government assistance	4
Utility assistance	0
Other government rental assistance	3
Housing Choice Voucher	7
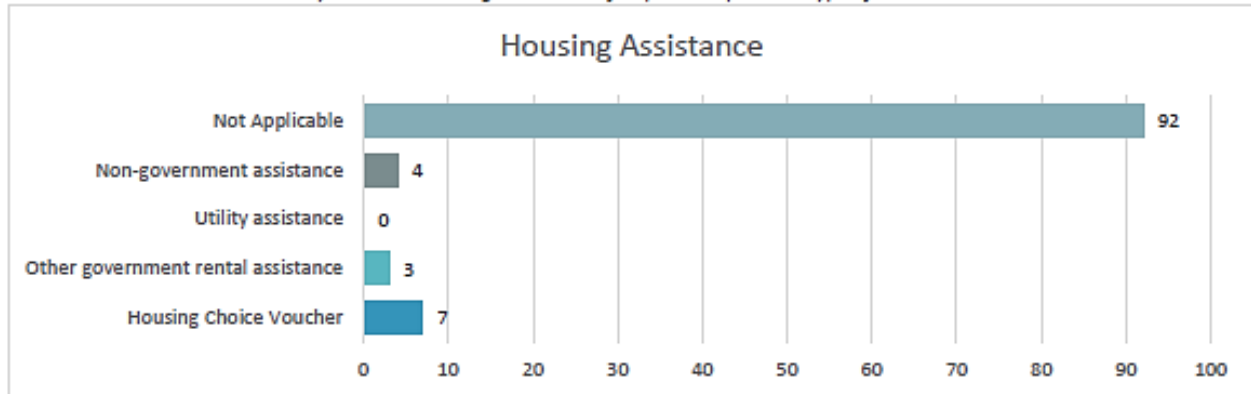
Only If you are a renter, answer the following: How important are the following factors in your housing choice?

Housing Choice Factors - Renters

■ Agree / Strongly Agree   ■ Disagree / Strongly Disagree

Factor	Agree / Strongly Agree	Disagree / Strongly Disagree
Afford Housing	45	9
Housing Accom Disability	11	14
Housing Large Enough	40	4
Credit History / Score	26	12
Deposit Amount	37	7
Neighborhood	34	7
Not Welcome	14	28

45
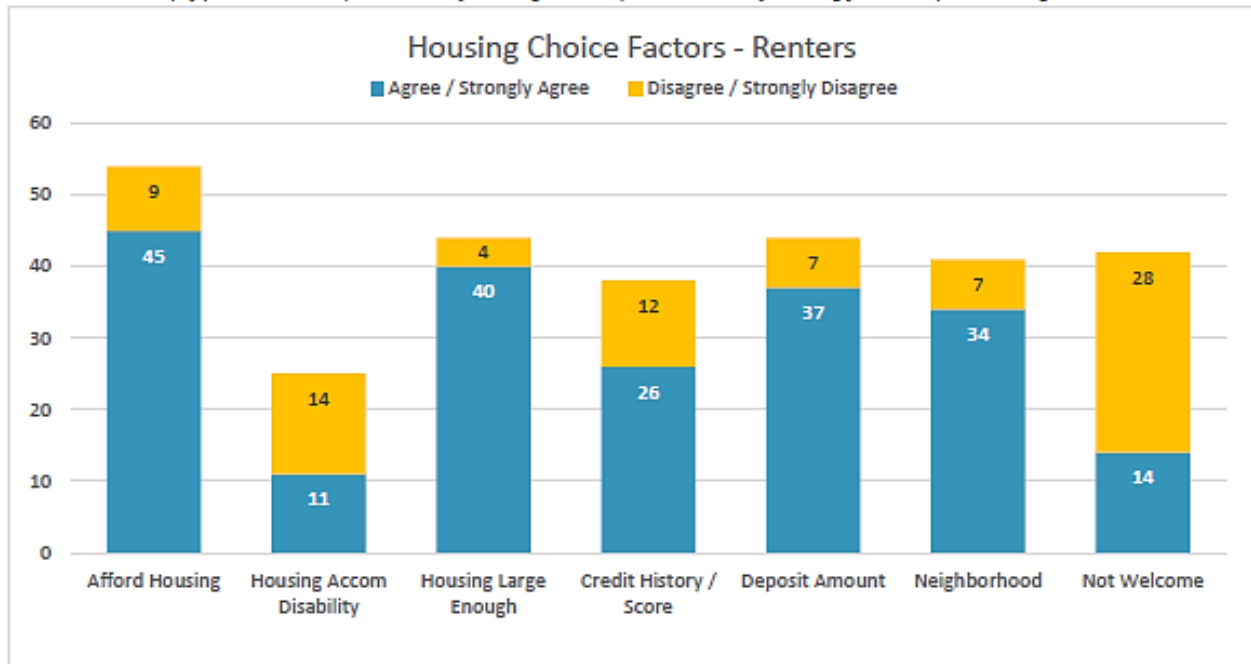
Only if you are a homeowner, answer the following: How important are the following factors in your housing choice?

Housing Choice Factors - Homeowners

■ Agree / Strongly Agree ■ Disagree / Strongly Disagree

Factor	Agree / Strongly Agree	Disagree / Strongly Disagree
Afford Housing	58	3
Housing Accom Disability	17	11
Housing Large Enough	57	3
Credit History / Score	44	6
Deposit Amount	43	7
Neighborhood	48	5
Not Welcome	5	31
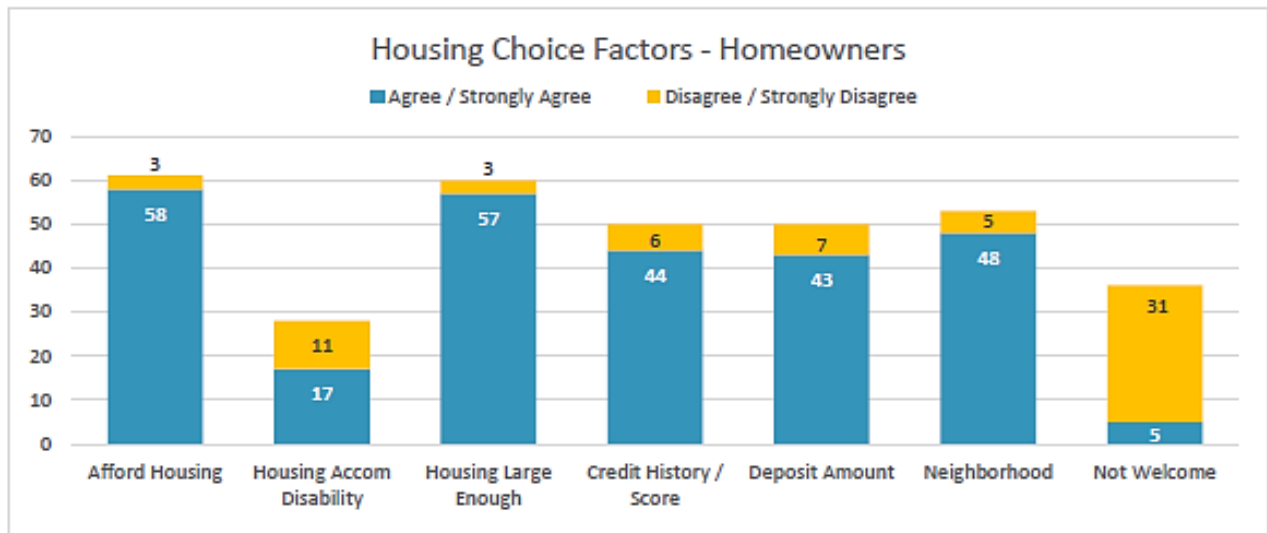
Have you ever experienced or witnessed housing discrimination in the state of Montana?

Witnessed Housing Discrimination

- No Response 1%
- I don't know 16%
- Yes 37%
- No 46%
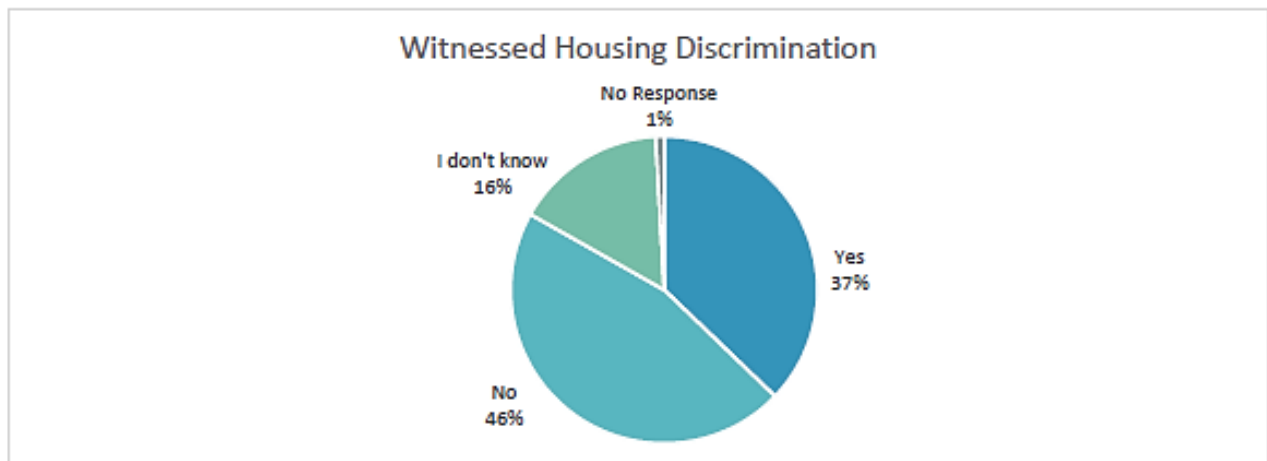
On what grounds do you believe you witnessed housing discrimination?

Ground	Count
Race	22
Color	8
Age	12
Marital Status	8
Creed	4
Religion	2
Sex/Gender	6
Sexual Orientation	7
Gender Identity/Expression	4
National Origin	2
Familial Status	21
Disability	11
Political Ideas	6
Ancestry	2
English 2nd Language	5
Citizenship Status	3
Level of Income	26
Source of Income	11
HCV or Other Assistance	12
Criminal Background	16
Not Applicable	47

46
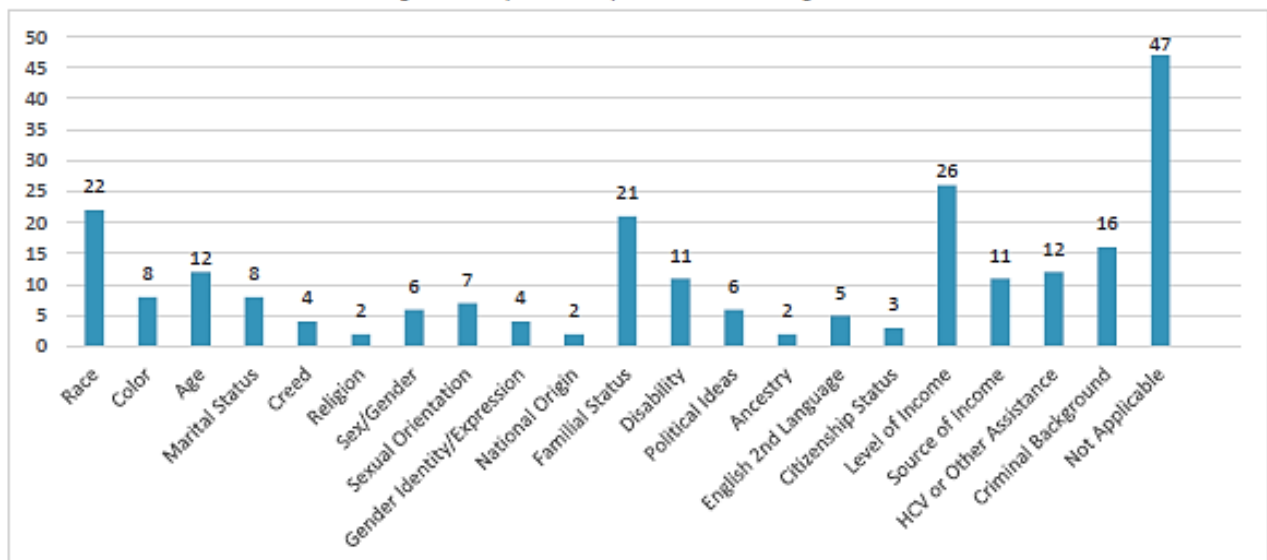
Which of the following best describes the person or organization that you witnessed engaging in discriminatory behavior?
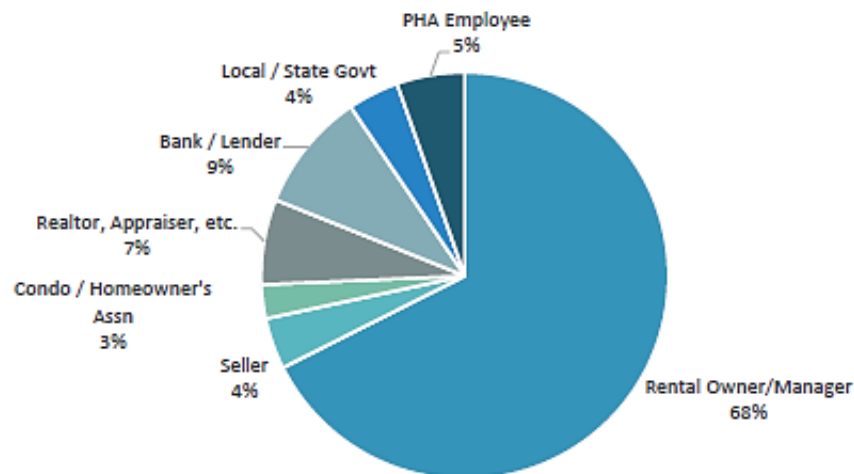
PHA Employee
5%

Local / State Govt
4%

Bank / Lender
9%

Realtor, Appraiser, etc.
7%

Condo / Homeowner's
Assn
3%

Seller
4%

Rental Owner/Manager
68%

What did you do or would you do if you experienced or witnessed housing discrimination?

Contacts following Discrimination

Category	Value
MT Fair Housing	38
Private Attorney	6
HUD	11
MT Human Rights	18
Local, State, Federal Govt	21
Local Nonprofit	5
Individual / Org Discriminating	21
Wouldn't Know	26
Nothing	7
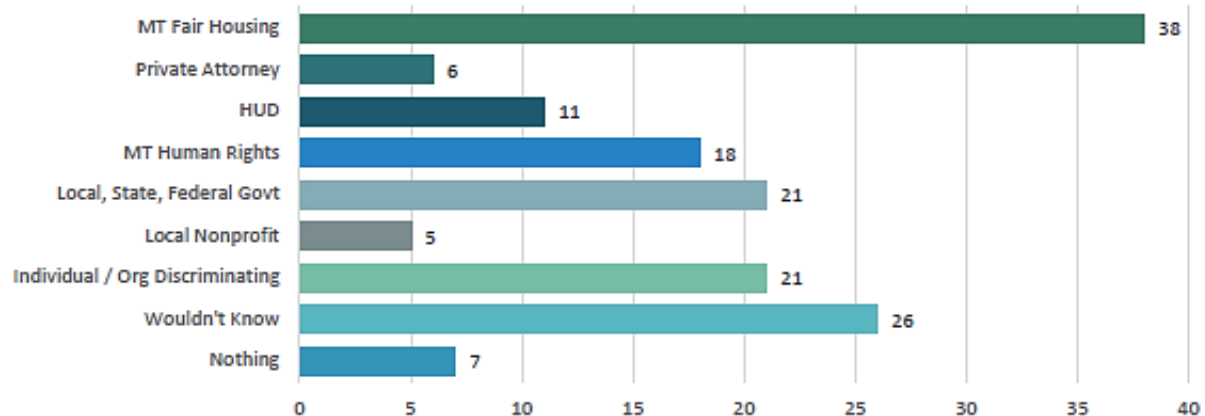
Do you know anyone in Montana who has faced the following?

Types of Discrimination

Category	Value
Not applicable	59
Unfair terms when buying / selling	10
Not given reasonable accom	9
Not shown all options	10
Directed to certain neighborhood	8
Denied avail housing options	11
Denied mortgage	4
Refused rental / sale agreemt	23

Availability of Neighborhood Amenities

■ Agree / Strongly Agree   ■ Disagree / Strongly Disagree

Amenity	Agree / Strongly Agree	Disagree / Strongly Disagree
Schools	60	19
Jobs	54	35
Public Transit	73	25
Parking	79	15
Parks	81	14
Pharmacy	83	20
Library	38	44
Grocery	89	15
Banks	85	20
Housing Conditions	83	18
Streets / Sidewalks	70	23
Public Spaces	63	22
Lighting	51	49

Which of these, if any, have made your housing choice or situation worse?

Category	Value
Weather-Related flooding	9
Wildfires	3
Job Loss	24
Utility Shut Down	4
Eviction	1
Crime	23
Extreme Weather	10
Increased rent/payments	26
Not Applicable	42

Who do you turn to when faced with housing struggles?

Housing Support

Category	Value
Did not need help, Not applicable	40
Family & Friends	39
Schools	0
Non-Profit Group	8
Government Agency or Program	14
Sport or Hobby Groups	0
Support Groups	1
Neighborhood Groups	2
Church or Faith-Based Groups	11

How familiar are you with Fair Housing Laws?

- No Reponse 0%
- Very familiar 13%
- Somewhat familiar 50%
- Not familiar 37%
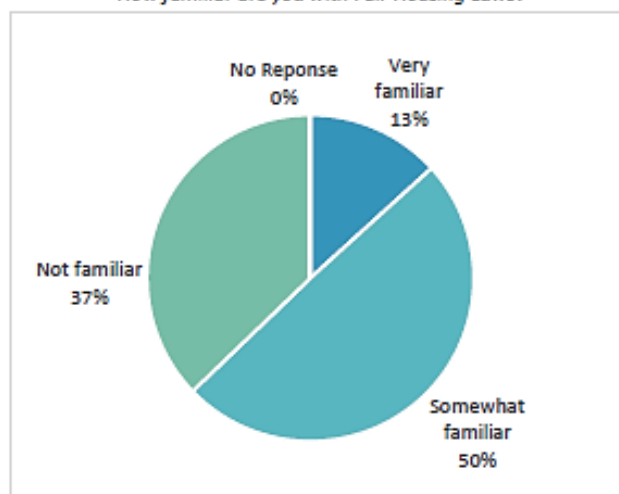
Do you think Federal and/or State Fair Housing Laws are difficult to understand or follow?

- No Reponse 1%
- Yes 42%
- No 23%
- I don't know 34%
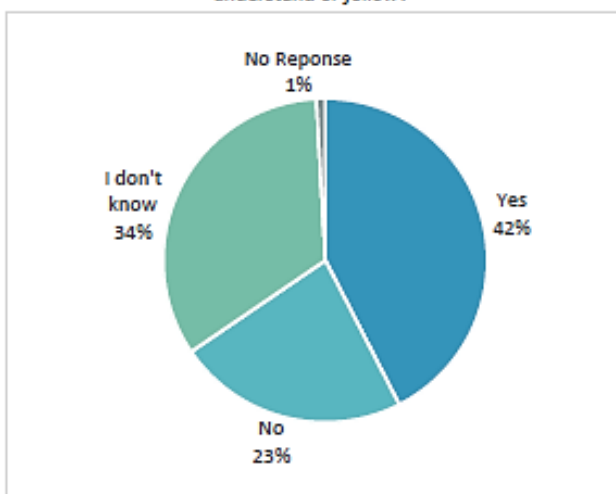
What is your race and ethnicity?

Respondent Race and Ethnicity

Category	Value
Other (please specify)	0
Hispanic/Latino	4
Mixed Race	6
White	102
Pacific Islander/Native of Hawaii	1
Black/African American	2
Asian	1
Native American/Alaska Native	8
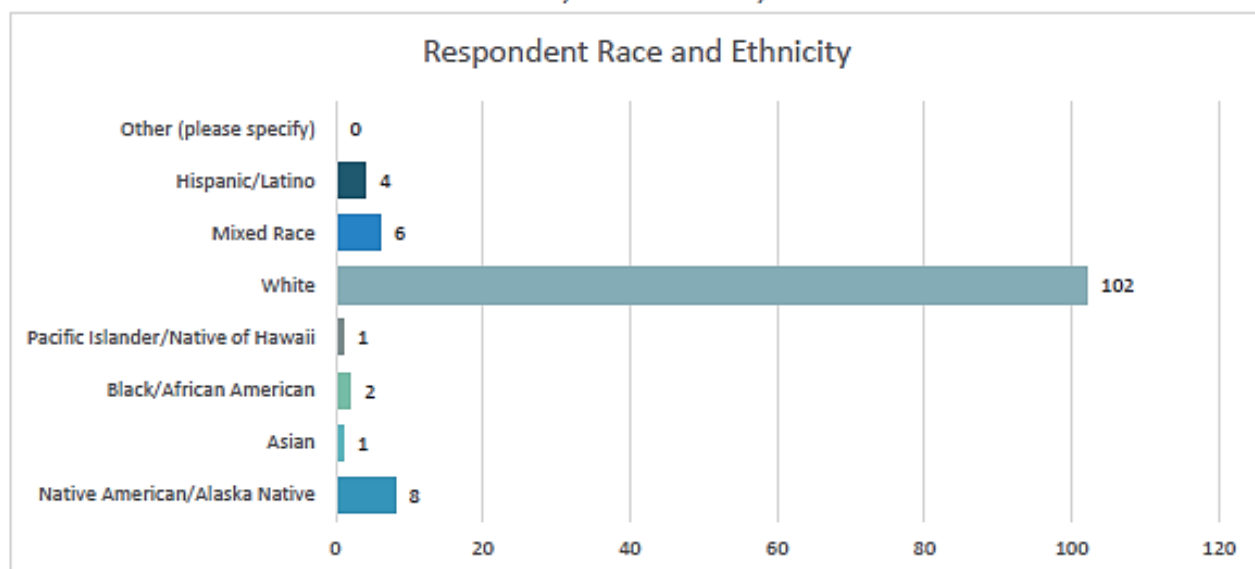
What is your first language?

Respondent First Language

- Spanish 0%
- No Response / Other 3%
- English 97%
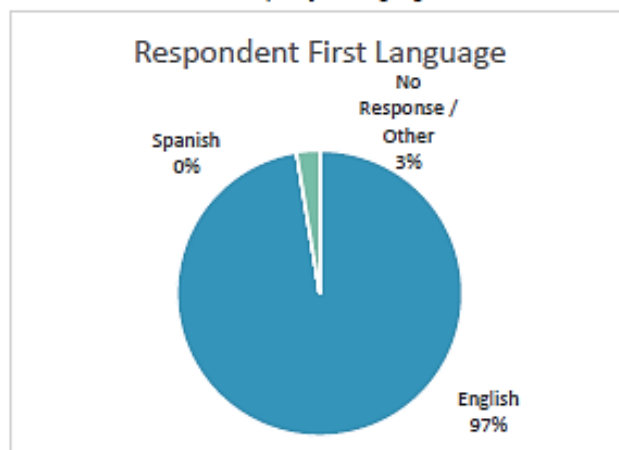
Are you, or someone in your household living with a disability?

Disability

- No Response 0%
- Yes 35%
- No 65%
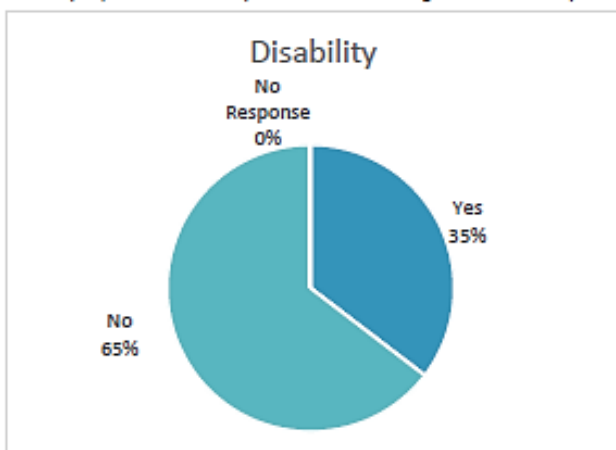
What is your highest level of education?

Education

- Less than High School: 1
- HS or GED: 16
- Vocational School: 0
- Some College: 36
- Associate Degree: 9
- Bachelor's Degree: 27
- Graduate Degree +: 24
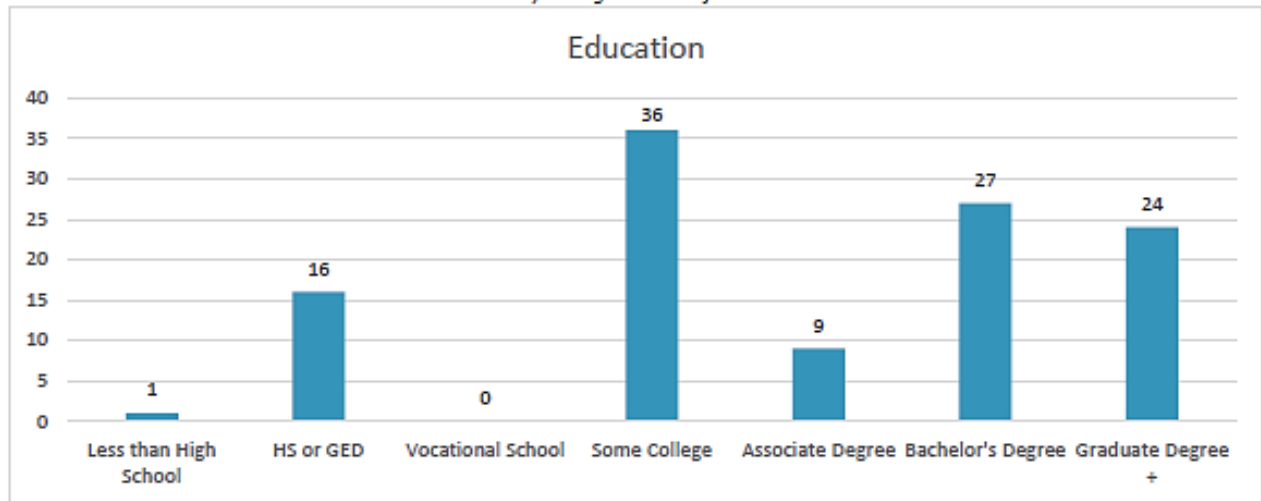
111 Respondent Households, 59 were Adults - No Children (53%), 52 were Adults w/Children (47%)

Please describe your household. (Children are persons under 18 years old)

Number of Adults & Children in Household

■ Adults ■ Children

	One	Two	Three	Four +	No Response
Adults	36	67	6	2	2
Children	27	20	4	1	61

Number of Adults & Children in Household

■ One ■ Two ■ Three ■ Four + ■ No Response

Adults	Children
36, 67, 6, 2, 2	27, 20, 4, 1, 61

Employment Status

Category	Value
Employed Full Time	73
Employed Part time	11
Retired	10
Not Employed; Not Looking for Work	8
Not Employed; Looking for Work	6
Student	4
No Response	1
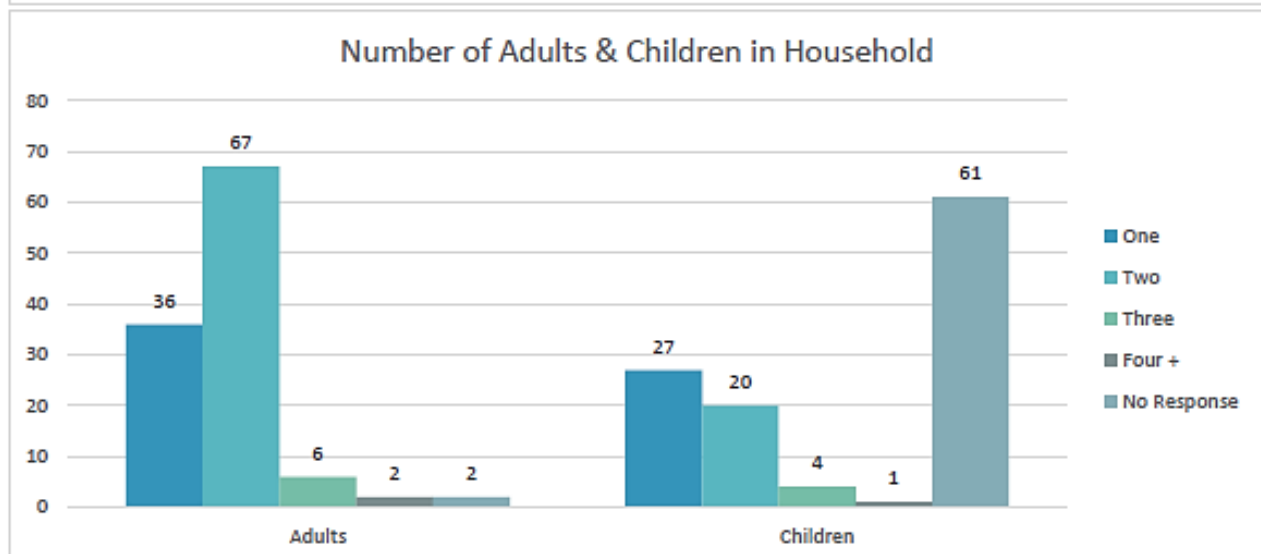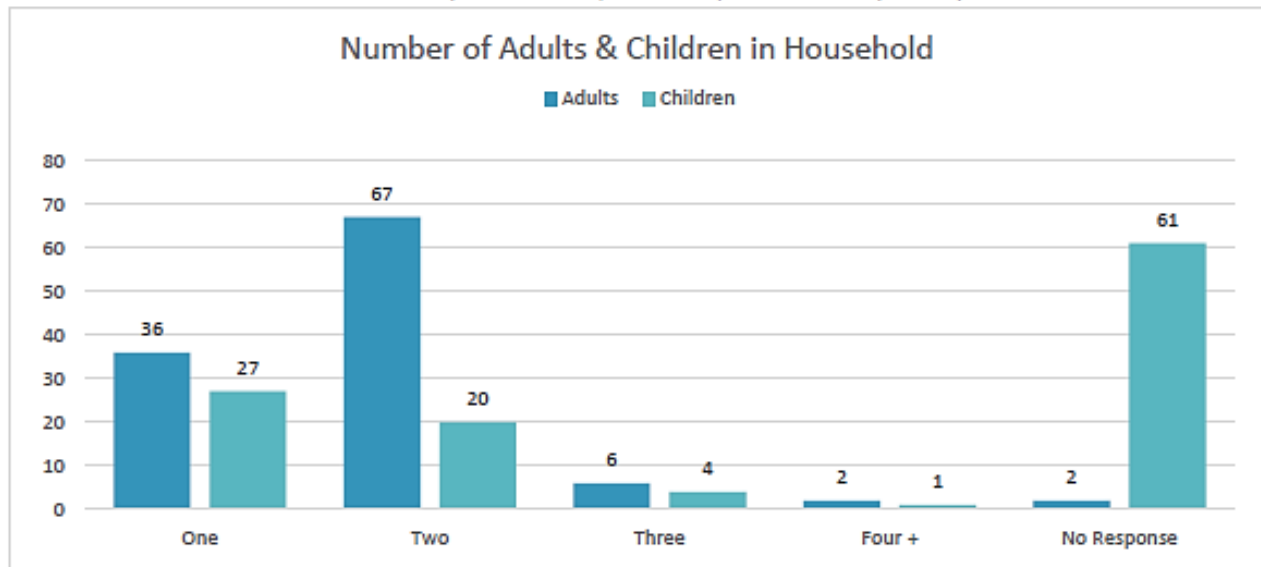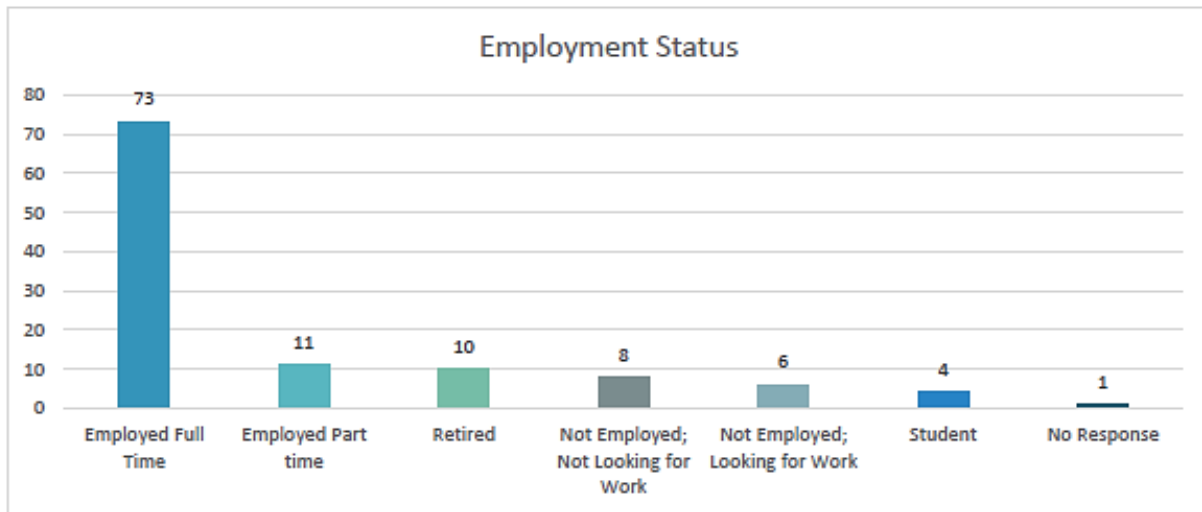
What is your income range?

Income

Category	Value
Less than $10,000	10
$10,000-20,000	13
$20,000-50,000	47
$50,000-80,000	20
$80,000-100,000	8
More than $100,000	13
No Response	2