

Rhode Island Consolidated Annual Performance and Evaluation Report

For Program Year 2023
(July 1, 2023 thru June 30, 2024)

DRAFT

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

Program Year 2022 is the third year covered in the 2020-2024 Consolidated Plan. Rhode Island continued strong progress toward many of the goals set out in the Consolidated Plan and the 2022 Annual Action plan. Notably, development and preservation of affordable units continued at a faster pace than anticipated, despite challenges that persisted as a result of the COVID-19 pandemic.

In PY19, Rhode Island was awarded \$7,841,160 under a new High Impact Neighborhoods Demonstration grant for lead hazard remediation in several zip codes in Pawtucket and Central Falls. All of the new systems required for this new lead program were developed during PY20 with remediation beginning in PY21. While the number of healthy homes projects completed did not meet the goals set for PY22, remediation completion rates are expected to continue to grow as a result of the work associated with the new grant in the coming years. This growth is expected to more than compensate for the lower outcomes observed in PY2022.

Like the rest of the country and the world, Rhode Island had to redirect many of its efforts in response to the COVID-19 crisis in 2020. Many housing-oriented initiatives came online during PY20, with several of these programs aiming to minimize the housing impacts of the pandemic continuing into PY2021 and PY2022. These included a statewide eviction moratorium, housing payment assistance, and significantly increased housing for those experiencing homelessness.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Rhode Island was able to develop and preserve a significant amount of affordable housing in PY22. Many of these units were at least partially funded through the LIHTC program, but HOME, HTF, and other sources of ancillary financing played important roles. Over all, 922 housing units were developed or preserved, which is 174.0% of the annual goal set out in the Consolidated Plan.

The total number of households served in pursuit of the goal to improve the health, safety and efficiency of all homes did not meet the PY22 targets. However, the number was slightly higher than the total from PY21.

Results of efforts to prevent and end homelessness were mixed, though the state exceeded the goal set for homelessness prevention by about 2000%. This may be due to the success of the state's coordinated entry system, which was fully implemented in PY19 and continued to improve

during subsequent years. However, the state fell short of achieving its goal for rapid rehousing.

Goal	Indicator	Unit of Measure	Expected – Program Year	Actual – Program Year	Percent Complete
Develop and Preserve Affordable Housing	Rental units constructed	Household Housing Unit	42	394	938.1%
Develop and Preserve Affordable Housing	Rental units rehabilitated	Household Housing Unit	477	252	52.8%
Develop and Preserve Affordable Housing	Homeowner Housing Added	Household Housing Unit	8	0	0.0%
Develop and Preserve Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	3	1	33.3%
Develop and Preserve Affordable Housing	Housing for Homeless added	Household Housing Unit	21	183	871.4%
Improve health, safety and efficiency of all homes	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	--
Improve health, safety and efficiency of all homes	Rental units rehabilitated	Household Housing Unit	69	81	117.4%
Improve health, safety and efficiency of all homes	Homeowner Housing Rehabilitated	Household Housing Unit	125	38	30.4%
Improve health, safety and efficiency of all homes	Other	Other	0	0	--
Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,000	21,594	144.0%
Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	750	10,329	1377.2%

Goal	Indicator	Unit of Measure	Expected – Program Year	Actual – Program Year	Percent Complete
Non-Housing Community Development	Businesses assisted	Businesses Assisted	0	0	--
Prevent and End Homelessness	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	315	46	14.6%
Prevent and End Homelessness	Homeless Person Overnight Shelter	Persons Assisted	3,000	260	8.7%
Prevent and End Homelessness	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	24	0	0.0%
Prevent and End Homelessness	Homelessness Prevention	Persons Assisted	6	16	266.7%
Prevent and End Homelessness	Housing for Homeless added	Household Housing Unit	0	0	--
Prevent and End Homelessness	HIV/AIDS Housing Operations	Household Housing Unit	0	16	--
Prevent and End Homelessness	Other	Other	0	0	--

Table 1 - Accomplishments – Program Year

Goal	Indicator	Unit of Measure	Expected	Actual	Percent Complete
Develop and Preserve Affordable Housing	Rental units constructed	Household Housing Unit	210	944	449.52%
Develop and Preserve Affordable Housing	Rental units rehabilitated	Household Housing Unit	2,315	2,489	107.52%
Develop and Preserve Affordable Housing	Homeowner Housing Added	Household Housing Unit	35	41	117.14%
Develop and Preserve Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	15	7	46.67%

Goal	Indicator	Unit of Measure	Expected	Actual	Percent Complete
Develop and Preserve Affordable Housing	Housing for Homeless added	Household Housing Unit	105	202	192.38%
Improve health, safety and efficiency of all homes	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	3	-
Improve health, safety and efficiency of all homes	Rental units rehabilitated	Household Housing Unit	490	143	29.18%
Improve health, safety and efficiency of all homes	Homeowner Housing Rehabilitated	Household Housing Unit	1,055	142	13.46%
Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	75,000	58,728	78.30%
Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3,750	14,063	375.01%
Prevent and End Homelessness	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1,250	1114	89.12%
Prevent and End Homelessness	Homeless Person Overnight Shelter	Persons Assisted	15,000	5,301	35.34%
Prevent and End Homelessness	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	120	0	0.00%
Prevent and End Homelessness	Homelessness Prevention	Persons Assisted	30	412	1373.33%
Prevent and End Homelessness	Housing for Homeless added	Household Housing Unit	0	3	-
Prevent and End Homelessness	HIV/AIDS Housing Operations	Household Housing Unit	0	64	-
Prevent and End Homelessness	Other	Other	0	0	-

Table 2 - Accomplishments – Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

CDBG funds for non-housing community development are distributed to units of general local government (UGLGs) to use to develop much-needed public facilities and infrastructure. Priority needs 5 and 6 (Table 50 of the 2020-2024 Consolidated Plan) are directly addressed by the distribution of these funds.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME	ESG	HTF	HOPWA
White	12,809	4	92	0	25
Black or African American	2,417	1	81	0	35
Asian	133	0	5	0	0
American Indian or American Native	33	0	2	0	0
Native Hawaiian or Other Pacific Islander	25	0	0	0	0
Other or Multiple Races	3,736	7	99	3	3
Unknown	0	0	6	0	0
Total	19,153	12	285	3	60
Hispanic	2,428	0	70	0	0
Not Hispanic	16,725	0	209	0	60
Unknown	0	0	6	3	0
Total	19,153	12	285	3	60

Table 3 – Table of assistance to racial and ethnic populations by source of funds

Narrative

CDBG and HOME race and ethnicity assistance statistics come from IDIS report PR23 Summary of Accomplishments.

49 HTF-assisted units are currently under construction. 25 of them are 99% complete and will lease up in 2024 (Covid-related supply chain delays prevented more timely completion). Loans for 13 additional HTF-assisted units will close in 2024. 28 HTF-assisted units have received preliminary commitments with loan closings expected in calendar year 2025.

Homeownership and Mortgage Services

During PY2023, RIHousing and its partners originated mortgages for 1,817 low and moderate-income Rhode Island households totaling \$656,353,369 to purchase homes. An additional \$11,219,136 helped 720 of these households with second mortgages. RIHousing maintained its percentage of new first mortgages to minority borrowers, with 50.5% of first time homebuyers being either from racial or ethnic minorities.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$5,942,863	\$8,537,362.90
HOME	public - federal	4,000,000	7,650,170.02
ESG	public - federal	\$656,824	\$552,966
HTF	public - federal	3,000,000	5,745,281
Continuum of Care	public - federal	11,463,583	4,886,187
LIHTC	public - federal	13,831,921	10,657,862
Section 811	public - federal	1,000,000	406,259
Other	private	360,000	360,000
Other	public - federal	3,815,388	3,815,388
Other	public - state	6,948,464	6,948,464

Table 4 - Resources Made Available

Narrative

Rhode Island did not spend all resources made available across several programs, but these funds will roll over to the next program year. In general, spending was more heavily concentrated in housing project-based programs, whereas some service-oriented and non-housing programs underspent. The COVID-19 crisis was a severe disruption to many programs.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Statewide Effort	100	100	Housing and Community Development

Table 5 – Identify the geographic distribution and location of investments

Narrative

There are no target areas defined in the state's Consolidated Plan besides overall statewide efforts. The geographic allocation of investments are reflections of the various program regulations, as defined in the state's Strategic Plan, specifically section SP-10. In general, HOME, CDBG and ESG funds prioritize investments that will assist those geographic regions that do not have access to entitlement funding for the same program, respectively. However, state CPD formula allocation funds may be used in entitlement communities if there is funding left over after non-entitlement awards are made and if a particular project addresses a high need priority or geographic area. LIHTC funds are awarded based on the dual geographic goals of developing affordable housing in parts of the state with few opportunities for low-income households and addressing concentrated vacancy and blight in urban areas that was caused by the housing crisis. State ESG funding assisted organizations to address homelessness statewide, as well as in the targeted communities of Providence, Woonsocket, and Pawtucket, which are

urban areas that contain many neighborhoods that have yet to recover from the housing crisis and face high unemployment rates than the rest of the state. State CDBG program regulations make CDBG funds available to all municipalities except for the CDBG entitlements of Cranston, East Providence, Pawtucket, Providence, Warwick, and Woonsocket. CDBG funds were awarded to the highest need areas of the state that are not part of these urban areas.

Leveraging

Explain how federal funds leveraged additional resources (private, state, and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

ESG

In PY23, the state's ESG formula allocation made up 5% of the funding for the Consolidated Homeless Fund, the remaining funding coming from a portion of the state's Title XX Social Services Block Grant, entitlement community formula allocations of ESG funds, the state investments through a restricted receipt account (the real estate conveyance tax), State Fiscal Recovery Funds, and temporary federal ERA2 funding. In PY21 and PY22, grant recipients were required to provide a 100% cash match using non-Hearth Sources of Funds. As shown in CR-75, ESG Expenditures in PY23 grant recipients provided a match of \$501,971.41 while the State provided a match of \$50,995.

HOME

HOME applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. PY23 match was achieved using cash equivalents from non-federal sources and state bond programs.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$109,829,503
2. Match contributed during current Federal fiscal year	\$4,640,000
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$114,469,503
4. Match liability for current Federal fiscal year	\$445,713.62
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$114,023,789.4

Table 6 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
5775	7/15/2021	\$4,640,000						\$4,640,000

Table 7 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
\$114,113.78	\$70,701.39			\$114,113.78

Table 8 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period

	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	2					2
Dollar Amount	\$8,687,142					\$8,687,142
Sub-Contracts						
Number	15	0		2	3	10
Dollar Amount	\$6,173,981			\$692,000	\$1,810,500	\$3,671,481

	Total	Women Business Enterprises	Male
Contracts			
Number	2	0	1
Dollar Amount	\$8,687,142	0	\$8,687,142
Sub-Contracts			
Number	15	1	14
Dollar Amount	\$6,173,981	430,000	\$5,743,981

Table 9 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Dollar Amount	0					

Table 10 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired						
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Cost	0					

Table 11 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	146	185
Number of Non-Homeless households to be provided affordable housing units	585	562
Number of Special-Needs households to be provided affordable housing units	0	0
Total	731	747

Table 12 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	190	70
Number of households supported through The Production of New Units	63	403
Number of households supported through Rehab of Existing Units	478	171
Number of households supported through Acquisition of Existing Units	0	0
Total	731	574

Table 13 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Rhode Island surpassed its goal for total household support in PY22 despite decreased rehabilitation new production rates compared to previous years. Rhode Island's traditionally low rental vacancy rate, which impedes lease up, has historically been one of the most significant contributors to the low voucher utilization rate. Shared jurisdiction between PHAs in the state continues to be explored to further promote voucher utilization, and legislation prohibiting discrimination on the basis of an individual's source of income was passed in April 2021.

Discuss how these outcomes will impact future annual action plans.

Future action plans will attempt to better account for state resources that leverage CPD funds for new unit production and preservation. The voucher utilization rate will be reflected in rental assistance targets.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual	HTF Actual
Extremely Low-income	578	3	3
Low-income	102	0	0
Moderate-income	320	0	0
Total	1000	12	3

Table 14 – Number of Households Served

Narrative Information

The total number of households served by CDBG includes non-LMI households.

RI Department of Housing (RIH) serves the worst-case needs by working with the Continuum of Care (CoC) to maintain an umbrella of services to assist residents in their time of need. In addition, RIHousing is working to develop housing opportunities for extremely low-income families and persons with disabilities with funding made available from the American Rescue Plan.

Applicants for HOME projects are given priority if HOME units are to be included in LIHTC projects. Many of the allocation priorities defined in the state’s Qualified Allocation Plan (“QAP”) for its Low-Income Housing Tax Credit program are based on federal criteria as well as state criteria. Federal tax code requires that preference for an allocation of credits must be given to developments serving the lowest income residents, developments which commit to the longest period of affordability and developments located in a qualified census tract (QCT). RIHousing may hold up to three competitive funding rounds each year for the 9% allocated credits but typically only holds one round per year. Applications for HOME funds are accepted with applications for 9% LIHTC. Remaining HOME funds for standalone HOME projects are allocated in a separate RFP process.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Rhode Island Continuum of Care (RiCoC) has a robust outreach system. The State Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) and the Office of Housing and Community Development have used Projects for Assistance in Transition from Homelessness (PATH) and Consolidated Homeless Fund (CHF) funding to ensure that outreach teams exist throughout the state to connect homeless individuals and families with housing and services that they require. The CHF is a braided federal and state funding source that awards funding to eligible projects for street outreach, which provides essential services to unsheltered homeless persons, connecting them with emergency shelter, housing, or critical services. The eligible costs and requirements for essential services consist of engagement, case management, emergency health and mental health services, transportation, and services for special populations. CHF funds are used for these services to the extent that other appropriate funding sources for these services are inaccessible or unavailable within the community.

The RiCoC has implemented a statewide Coordinated Entry System (CES) to match people experiencing homelessness with the resources needed to resolve their homelessness as quickly as possible. This includes various diversion, shelter, and housing assessments to triage available resources based on vulnerability of those who are requesting resources. Once assessed, those needing diversion, shelter, and/or supportive housing are referred to available resources including subsidies and units. If a resource is not found, the CES ensures their continued access to services and supports as they come available. Persons are prioritized for housing based on their severity of need and length of time homeless. CAP agencies and service agencies also are aware of the assessment processes. RiCoC and CHF policies require providers of supportive housing to implement a low barrier approach to entering programs and receiving assistance and vacancies (CoC, RIHousing-funded, and State-funded) are reported to the CES.

Addressing the emergency shelter and transitional housing needs of homeless persons

In PY23, the State's homelessness programming, as measured through the State Homeless Management Information System database, served 3,865 persons with emergency shelter and 225 persons with transitional housing. The Consolidated Homeless Fund and the Continuum of Care combine to fund 224 transitional housing units per year, with 50.45% of these homes being available to households with children. Transitional housing is intended to be a steppingstone for a household while they are securing their own homes. A case manager works with the household in transition to develop a case plan that has realistic outcomes, recognizes the strengths of the household and addresses barriers to independent living, and develops action steps to make that transition. Case managers work with members of the household to attend financial literacy and other life-skills workshops that are available in the immediate area. Services available include referrals to community healthcare resources and assistance with

obtaining health insurance. Some units of transitional housing include nurses and psychiatrists to address client needs for psychotropic medications and to monitor their health status. Applicants for funding to operate transitional housing include measurements of outcomes related to successfully transitioning clients to permanent housing, usually as percentages of clients that achieve increased income, secure permanent housing, or achieve goals as part of their individual service plans. The State and entitlement city ESG funds awards are coordinated to ensure all parts of the state can meet the emergency shelter, Rapid Rehousing and Street outreach needs of persons. Domestic Violence Shelter placements are available throughout the state. Rhode Island is committed to decreasing the length of stay in these facilities by expanding its rapid re-housing and permanent supportive housing programs through CoC and State Rental Assistance dollars and other local initiatives.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The Rhode Island Department of Children, Youth and Families (DCYF) has a policy not to discharge clients into homelessness and has committed to this policy through a Memorandum of Agreement with the Office of Housing and Community Development. Youth unable to go home are given the option of participating in the DCYF-funded Voluntary Extension of Care (VEC). VEC supports those in DCYF care at age 18 who want continued help. DCYF's Youth Development Support (YDS) staff works to aid young adults who participate in the VEC program.

An Agreement between the Dept. of Health (DOH) and Office of Housing and Community Development dictates that hospital patients not be discharged into homelessness. Patients remain hospitalized until they are healthy enough to move on to housing and receive case management support in developing a discharge plan.

Money Follows the Person (MFP) transitions eligible individuals who are in a qualified institutional setting for 90 days or more into a qualified community-based residence. The program uses a coordinated system of care to assist a participant transition into and to successfully remain in the community, with the appropriate supports, so that they can experience more independence and a better quality of life. Section AP-85 of this action plan includes more information on preventing homelessness for persons and households facing substantial healthcare needs.

An agreement between BHDDH and the Office of Housing and Community Development dictates that patients of mental health institutions are not to be discharged into homelessness. BHDDH supports the Housing First model with PATH and SAMSHA grants for client-centered permanent housing and funds new supportive housing for people with serious mental illness and developmental disabilities through the 811 Project Rental Assistance program (administered by RIHousing).

BHDDH also provides planning assistance and services for the development and implementation of behavioral health prevention, treatment, and recovery support policies, programs, and services. The Unit also administers federal block and formula grants from the Substance Abuse and Mental Health Services Administration, the Office of Juvenile Justice and Delinquency Prevention, and the Department of Education.

BHDDH's primary effort in provision of services to the homeless is through its grant for Projects for Assistance in Transition from Homelessness (PATH). RI received the base \$299,000 PATH grant again during PY23 and was approved for additional funding to be used for technical assistance and training. This grant targets people who are suffering from serious mental illness and substance abuse and who are—or at risk of—becoming homeless. PATH funded services consist primarily of outreach, engagement, screening, and diagnosis.

Evidence suggests that providing services beyond post release supervision, such as substance abuse treatment, mental health services, job placement and educational services lowers the recidivism rate. Public safety improves and correctional and criminal justice costs are reduced in the long run when ex-inmates are directed away from re-offending to more productive work.

Through EO 04- 02, RI has initiated a comprehensive approach to offender reentry facilitated with technical assistance from the National Institute of Corrections, represents the efforts of the Department of Corrections, the state legislature, other state and community agencies, local governments, and law enforcement. The committee is divided into three tiers. The first, comprised mainly of cabinet-level appointees, focuses on policy issues. The second, consisting of departmental appointees and directors of community organizations, examines management issues. The third tier, comprised of front-line workers and managers, addresses programmatic issues.

Community reentry councils, have been established in Providence, Pawtucket, Newport, and Warwick to help assist offenders returning to their community.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Chronically homeless and high acuity individuals and families have been a priority for placement into permanent supportive housing in Rhode Island for the past several years. This commitment has been supported by the institutionalization of universal assessment tools, which prioritizes shelter and housing for the most vulnerable people experiencing homelessness. These tools guide the Coordinated Entry System (CES), which is managed through RI's Homeless Management Information System (HMIS). Both CES and HMIS are key functions of the RICoC and are implemented by the RI Coalition to End Homelessness. CES utilizes a prioritization list from HMIS for shelter and housing ranked by longest

length of stay and acuity, among other prioritization criteria defined by the RICOc.

The RICOc and its CES host MOUs with multiple housing authorities for Mainstream voucher programs, and HMIS collaborates on a HUD Move On initiative with one housing authority in Rhode Island. Rhode Island also received a HUD Section 811 rental assistance award for 150 units. These units serve chronically homeless and homeless in institutions. RIHousing, the Money Follows the Person (EOHHS) office and BHDDH have entered into memorandums of understanding to ensure services are available and that those who are high utilizers of Medicaid are served first. (See goals in SP-60 of the Consolidated Plan).

During PY2023 the RICOc continued to partner with RIHousing and the Providence Housing Authority to deliver the Emergency Housing Voucher (EHV) Program created by the American Rescue Plan Act (ARPA). Through EHV, The Department of Housing and Urban Development (HUD) awarded 159 housing choice vouchers to the two Public Housing Authorities in order to assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability. The PHA were required to partner with their local continuum of care and leverage their CES for referrals into these EHV's.

During PY2023 the RICOc continued to deploy its \$3.5M award from HUD's Youth Homeless Demonstration Program to develop and then fund a plan to end youth homelessness in Rhode Island. Planning commenced in Fall 2021, project selection occurred at the end of PY21, and the RICOc is now in the midst of its second full year of youth homelessness program implementation during PY2023. All funding is renewable in perpetuity in accordance with ongoing congressional appropriation.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

RIHousing, as a public housing agency (PHA) servicing the communities without local PHAs, administered funding for approximately 1,500 tenant-based vouchers. Recent changes to HCVP include a HUD-approved set-aside for formerly homeless individuals to obtain a housing choice voucher through the Move-Up Initiative, a local version of HUD's Moving On initiative, implementation of a Veterans Affairs Supportive Housing (VASH) program for veterans who have experienced homelessness, a Family Unification Program for families and youth who have experienced homelessness and are at risk for or have involvement with the state foster care system, and the on-going maintenance and expansion of a centralized waitlist for the State's PHAs.

In PY23, RIHousing focused on expanding affordable rental opportunities to special populations through numerous applications for HUD's specialty HCV programs. These special purpose voucher programs include expectations from HUD of additional supports for the target population either provided through HUD funding or through Memorandum of Understanding with local state and community partnership. RIHousing was awarded new Veterans Affairs for Supportive Housing (VASH) vouchers for veterans experiencing homelessness; new Family Unification Program (FUP) vouchers for families and youth who have engaged with the child welfare system; continues to grow its Foster Youth Initiative (FYI) program for young adults aging out of foster care who are homeless or at risk of homelessness; operates its Move Up/Move On vouchers for individuals and families who no longer require the services available in Permanent Supportive Housing and its Emergency Housing Voucher program issued during the COVID-19 pandemic. RIHousing was awarded 28 FUP rental assistance vouchers to be awarded for families and youth who have engaged with the child welfare system. RIHousing was awarded 25 rental assistance vouchers for veterans experiencing homelessness. We have partnered with the Providence VA Medical Center on this initiative.

RIHousing successfully opened the Centralized Waitlist Portal in 2017, with 18 agencies now participating throughout the state. During PY2023, RIHousing entered into agreements with two PHAs to share jurisdiction on special purpose vouchers, further enhancing our ability to serve the needs of our constituents. We continue our outreach to other PHAs to collaborate on waitlist management and jurisdictional boundaries. RIHousing plans to continue efforts to encourage the remaining Rhode Island housing authorities to join the system.

The federal HCV program is not structured or routinely funded to specifically support security deposit assistance, which is a necessary monetary expense of households leasing up in the HCV program. The HCV program relies upon the private rental market and landlords routinely request a full month's rent amount as a security deposit, in addition to the initial month's rent that is due upon move in. HUD's HCV program does not provide funding specifically covering security deposit assistance, which means RIHousing cannot routinely pay for security deposits as a part of its HCV, despite this being a routine cost of leasing up in any rental assistance program. At the same time, Rhode Island has experienced a low vacancy rate in recent years. This tight rental market is increasing competition for rental units and leading to long timelines for referred clients to locate units. To address these barriers existing for HCV households, RIHousing has begun

investing its own proceeds to pay security deposits for households who cannot support deposit payments on their own and to pay landlord incentives to encourage landlords to lease their vacant units to HCV households.**Actions taken to encourage public housing residents to become more involved in management and participate in homeownership**

RIHousing has served as Family Self Sufficiency (FSS) program coordinator for more than 30 years and currently has 169 participants actively enrolled in the program. Family Self Sufficiency (FSS) enables individuals and families who receive assistance through the Housing Choice Voucher Program (HCVP) to learn the fundamentals of money management and achieve economic independence.

In 2023, RIHousing had 18 families graduate from the program and disbursed \$162,393 in Family Self Sufficiency (FSS) escrow funds.

Actions taken to provide assistance to troubled PHAs

Not Applicable

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

Rhode Island municipalities have a great deal of autonomy in setting zoning and land use policies as well as permit fees but the current housing development process in Rhode Island is lengthy and convoluted. However, there has been progress in recent years to standardize some of these practices to reduce uncertainty for developers and ensure that fees are appropriate and proportionate.

In the 2023 legislative session, the Speaker of the House, Speaker Shekarchi, led the introduction of a package of fourteen bills intended to streamline and simplify the development process. All but one of the bills in the package became law. Included in the package were bills that streamline the municipal review process for comprehensive permits and reduce steps in the zoning and planning review process. One bill streamlines and standardizes the appeals process by eliminating the State Housing Appeals Board (SHAB) so both appeal approvals and applicant appeals go directly to Superior Court. Other bills in the package establish a land use court to speed up the processing of land use matters and amend and eliminate certain provisions of the sub-division of land and review process. Several bills took innovative approaches to increasing housing production such as a bill which creates a transit-oriented development pilot program to encourage growth centers along transit corridors identified by state transit plans and a bill that facilitates the adaptive reuse of commercial buildings for housing. All the legislation in this package should make a significant difference to remove barriers to housing production and affordability in Rhode Island.

In the 2024 legislative session, Speaker Shekarchi led the passage of another package of fourteen housing related bills. This package included legislation that would streamline and incentivize the development of Accessory Dwelling Units (ADUs), as well as legislation to build the capacity of local planners and building inspectors and to transition to an electronic process for land development approvals. The two commissions established in 2021 to study barriers to housing development and how to address them were extended. The Special Legislative Commission to Study Housing Affordability, formally known as Special Legislative Commission to Study Low and Moderate Income Housing Act, has an expanded purpose now including a comprehensive review of housing affordability in Rhode Island. The Legislative Commission to Study the Entire Area of Land Use, Preservation, Development, Housing, Environment, and Regulation has also received an extension to June 8, 2025, for its work.

Governor McKee's FY23 budget included numerous initiatives aiming to improve the stock of affordable housing in the state, including \$100 million to expand a program at RIHousing to provide additional investments in the development of affordable housing units. Of this amount, \$10 million was made available to RIHousing to establish a pilot program that shall direct funds to support low-income public housing through financing for pre-development, improvement, and housing production costs. \$25 million was allocated to RIHousing toward acquiring properties for redevelopment as affordable and

supportive housing. \$10 million was allocated for the Affordable Housing Predevelopment Program to support predevelopment work for proposed affordable housing developments to build a pipeline of new projects and build the capacity of affordable housing developers in the state to expand affordable housing production. \$1.5 million was allocated to predevelopment and capacity building to increase contract staffing capacity to administer proposed affordable housing projects. The budget also included \$1.4 million for RIHousing to create and support a subsidiary dedicated to providing proactive support to municipalities for affordable housing projects. RIHousing's Board of Commissioners has moved forward with the implementation of this subsidiary and the Agency is currently in the process of identifying and hiring staff to lead this new effort.

Those investments were further augmented by an additional \$10 million included in the FY24 budget to support targeted housing development, and the creation of a new State Low Income Housing Tax Credit program funded at \$30 million per year for five years. The FY25 budget also includes a \$120 million Housing Bond, the largest in the state's history. This bond will be on the November 2024 ballot and will be largely targeted to the development and preservation of affordable housing. RIHousing has also launched the Municipal Technical Assistance Program (MTAP), a program created through the state Housing Production Fund appropriation in the FY22 budget. \$4 million of the initial allocation has been made available for municipal technical assistance through MTAP. The program is intended to be used for technical assistance for cities and towns to support increased local housing production. All the tools will be made publicly available to cities and towns. To date, the program has invested \$3.3 million to assist 32 cities and towns remove barriers to the development of affordable housing through housing needs assessments and analysis, zoning templates to implement the new land use laws, public engagement and education, and infrastructure capacity assessments.

On June 26, 2024 HUD announced that the State of Rhode Island had been awarded a \$3.8 million grant under HUD's new Pathways to Removing Obstacles (PRO) Housing program. RIHousing is a partner in this application which will focus on expanding Rhode Island's Health Equity Zone Housing Pilot, assessing opportunities for statewide regulatory and building permit improvements, and spurring affordable housing development including through assistance with site acquisition and predevelopment costs.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Medicaid is an important funding source for housing stabilization services. The Home Stabilization amendment continued in FY23 and RI continues to do educational and technical assistance opportunities to increase providers applying for certification, incorporating this funding source into programs and developments. In the FY22 budget, the five year Pay for Success Permanent Supportive Housing Program was authorized to assist in housing those experiencing chronic homelessness. PFS began its first year of implementation in PY23 and services and housing placements are underway.

Youth aging out of foster care

The R.I. DCYF is the principal agency charged with ensuring that youth aging out of foster care do not become homeless. DCYF provides voluntary extension of care (VEC) to young adults at age 18 who want continued help as they begin their adult lives. DCYF staff determine if youth need more intensive, longer term services through DCYF and/or the BHDDH.

De-institutionalized elderly and disabled

The Section 811 Project Rental Assistance Program provides project based rental assistance to affordable housing projects that serve extremely low-income persons with disabilities, and targets multiple populations of people with disabilities seeking to live in community based settings. RI Housing awards rental assistance contracts and BHDDH providers deliver comprehensive services, support for independent living skills training, mental health services and connections to Medicaid to the eligible populations. Through June of 2024, RI Housing approved 137 units under this program, and are currently supporting 54 households. In PY23 RI Housing applied to expand its 811 PRA program by an additional 150 units. A decision on that application is still pending at this time.

RI has advocated for the statewide accommodation for the development of accessory dwelling units, on the site of single-family owner-occupied dwellings, for family members. This prohibits municipalities from restricting in-law apartment development for this use. The revisions to the state's ADU laws passed in the 2024 session specifically allows by right ADUs for family members and their caregivers. Combined with the other changes to the law, this should make it much easier for families to help family members age in place. RI Housing is also in the process of making changes to its design and construction standards to increase incorporation of accessibility features in the housing we finance. This includes requiring roll-in showers in a minimum of 1 out of every 5 accessible units, highly encouraging roll-in showers in all age-restricted units and 1- bedroom accessible units, and requiring in-wall blocking that is structurally capable of supporting the future installation of grab bars and shower seats, at all unit bathrooms. All developments that do not trigger UFAS compliance (i.e. developments with fewer than 4 units) will be strongly encouraged to meet these requirements and developers are encouraged to be familiar with Universal Design concepts. In addition to these new design guideline requirements, RI Housing has engaged a consultant to host stakeholder meetings with advocates for disabled populations. With input from this group, the consultant will create a resource manual to guide developers and property owners in going beyond required accessibility and adaptability features to create living spaces that can meet the needs of most residents and their visitors.

Under the requirements of the HEARTH Act, The RICO has implemented a Coordinated Entry System. Coordinated Entry aims to help households move through the homeless system faster, reducing new entries into homelessness, and improve data collection and quality.

The re-entry of discharged inmates into community settings

In 2022, The RI DOC continued transitioning offenders, within 9 months of release from incarceration, with necessary services. Specialized Discharge Planners and Community correction assessment analysts work with clients while incarcerated to develop reentry plans. The Exit Center is a one-stop reentry

resource center where released offenders can access community and state resources and assistance with applications for public benefits.

Rhode Island continued to work towards reducing recidivism through the 9 Yards Program, OpenDoors, and Crossroads Homeless Sex Offender Reentry Program. Reentry staff work to provide access to local information related to housing, community programs and networking activities related to housing. They work with housing outreach workers to locate affordable housing.

Preventing homelessness

In addition to the investments the state has made in affordable housing development in recent years, it has also significantly increased investment in homeless and homelessness prevention programs. The FY23 through FY24 budgets included \$86 million in new investments in homeless assistance programs administered by the Department of Housing.

Rhode Island continued to work towards reducing recidivism through Pay for Success, OpenDoors, and Crossroads Homeless Sex Offender Reentry Program. Reentry staff work to provide access to local information related to housing, community programs and networking activities related to housing. They work with housing outreach workers to locate affordable housing.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Rhode Island also continued to support the ongoing work to reduce lead-based paint hazards. Rhode Island has the 4th oldest housing stock in the nation and this stock requires proper maintenance and rehabilitation to mitigate the hazards posed by the widespread use of lead-based paint prior to 1978.

RIHousing LeadSafe Homes Program (LSHP) is a Green and Healthy Homes model program that is able to produce comprehensive interventions that reduce lead hazards, address healthy homes hazards, and reduce energy consumption in a cost effective and efficient manner for families in the Program's at-risk target communities. While no set-asides exist within the regulations of the program, historical program data suggests that, in a given calendar year, 60% of funds go to multi-family projects, either owner-occupied or not, and 40% go to single family homeowners. As stated in the Strategic Plan, Goal 3 of the 2020-2024 Consolidated Plan is to improve the health, safety, and energy efficiency of all Rhode Island homes. In September 2019, RIHousing was awarded \$7,841,160 under a new High Impact Neighborhoods Demonstration grant for lead hazard remediation. The grant is targeted to areas with high concentrations of both pre-1940 housing, low-income families, and high rates of young children with elevated blood lead levels. RIHousing's grant will address lead hazards in four census tracts in Pawtucket and Central Falls. New LSHP systems were developed for effectively utilizing these funds in PY20. During PY23, a total of 37 units were remediated under the LeadSafe Homes Program.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

RI Department of Housing and RIHousing employ a multifaceted approach to reducing the number of

families living in poverty. The first is providing affordable, stable housing to low-income families. For families leaving the shelter system with a rental housing placement, stabilization and self-sufficiency programs are offered and promoted. RIHousing and many PHAs throughout the state administer successful family self-sufficiency (FSS) programs that help families transition from public assistance in rental housing to independent homeownership. Continuum of Care-funded projects work to increase cash income from employment, providing employment and training opportunities through their agencies, i.e., CNA training at CrossroadsRI, carpentry training and a culinary arts program at Amos House, recovery coach and clinician training at the Providence Center, retail training at Foster Forward, and retail training at House of Hope. Many of these job training initiatives were funded by the Governor's Workforce Board – Workforce Innovation Grants program. Projects also assist their participants in accessing training and job openings through a partnership with the RI Department of Labor and Training.

Family Self Sufficiency program

In addition to providing rental assistance, the Family Self-Sufficiency program works with renters to develop escrow accounts in order to save for homeownership. RIHousing runs a voluntary FSS program through its authority as a PHA and receives approximately \$200,000 per year to support three full-time FSS coordinators. The FSS graduated 18 families from the program in PY 2023 and disbursed a total of \$162,393 in FSS escrow funds. 169 families were enrolled in the program by the end of PY23. Many enrolled families also established savings accounts and began participating in educational programs with the intent of becoming homeowners. RIHousing conducts outreach to all HCVP participants to participate in the Homeownership program by holding quarterly presentations to which all tenants are invited to attend; RIHousing also provides support to other PHAs in increasing participation in Homeownership programs throughout the state.

2022 Action

In PY23, RIHousing continued providing \$10,000 in interest-free down payment assistance to eligible first-time homebuyers through their 10kDPA program which was initiated in 2020. During the program year, 105 loans totaling \$1,050,000 were issued through the program.

The COVID 19 pandemic has threatened the housing stability of many homeowners and renters in Rhode Island. Several emergency assistance programs, including RentRelief RI and HAF-RI were administered by RIHousing in PY2021 with funding through the American Rescue Plan Act to help residents impacted by the pandemic remain in their homes. Both programs closed to new applicants in 2022 but will continue to disburse funds as they remain available into the next program year.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The coordination of State, Federal, and private resources improved access to housing and community development resources and focused these resources to high priority areas and initiatives. Periodic

meetings of the State agencies improve the coordination of current funding programs as well as implementation of new housing policies and programs.

In 2021, a Deputy Secretary of Commerce for Housing role was created to oversee the State's housing efforts. The General Assembly built on that first step with the creation of the Department of Housing in 2022, including a new position, the Secretary of Housing, to lead Rhode Island's housing efforts.

Systems Development and Capacity Building – Consolidated Homeless Fund

In PY22, the state continued the implementation and refinement of its Coordinated Entry System (CES) for the entire state with funding from the Consolidated Homeless Fund, the Continuum of Care, and the Emergency Solutions Grant. The CES, especially the diversion processes therein, serves to not only reduce the number of persons entering homelessness but also to reduce time spent homeless. In PY22, the RI Coalition to End Homelessness continued its oversight of the CES, including call center operations, which are made available 365 days a year, shelter and housing assistance assessment, and referral components, such as shelter referral and housing prioritization. As part of its crisis intervention efforts, Rhode Island's CES also provides a range of outreach services to homeless adults and families.

The Rhode Island Continuum of Care continued to improve and formalize its governance structure in 2022. The state uses a housing first model to place families and individuals quickly into housing, which requires that a household is housed without preconditions (ex: participation in treatment or services, employment) as a prerequisite to obtaining or maintaining that housing. The CoC uses HMIS to identify previously homeless families seeking further homeless services and offers referrals to permanent supportive housing or rapid rehousing services to these households as it is available. RIHousing staffs the Continuum of Care and both RIHousing and RIH are members of the CoC Board.

Rhode Island's Consolidated Homeless Fund (CHF) combines all ESG funds (state and entitlements), state funding for homelessness, and Title XX block grant funds into one program. The homeless system funding committee relies on information provided by the RICoC including point-in-time statistics, HMIS performance reports, and subrecipient capacity reports. The CoC also aids in the development of performance standards and provides outcome evaluations of all Consolidated Homeless Fund providers via the System Performance Committee.

Once the allocation of funds and funding priorities are determined, the Consolidated Homeless Fund issues a Request for Proposal. Eligible entities including not for profits and units of local government apply for funding in accordance with the RFP guidelines. The Consolidated Homeless Fund then convenes a review committee to review and evaluate proposals and to make funding decisions.

The Rhode Island Coalition for the Homeless is the HMIS Lead Agency and has a memorandum of agreement with the RICoC. The determination for assistance via ESG and CoC supportive housing programs are based on HMIS data, which includes each individual's or household's vulnerability assessment score and priority designation. To the extent RICoC and RIH programs support survivors of domestic violence, data is held in a comparable database, which is overseen in RI by the Coalition to End Domestic Violence; this is required both for security reasons and regulatory compliance.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

HUD Section 811 Project Rental Assistance Program

RIHousing, the Executive Office of Health and Human Services (EOHHS), and the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) will build on their strong history of collaboration and Rhode Island's strong infrastructure and supportive service system to administer the HUD Section 811 PRA Program in Rhode Island.

Systems change associated with implementation of the PRA will result in seamless communications between EOHHS, BHDDH and RIHousing; increased placement of disabled individuals in integrated community-based settings; and greater oversight of the provision and expansion of quality housing and services. The effects of this system change will be measured by:

- The decreased number of disabled individuals on waitlists
- The increased number of disabled individuals who are placed in integrated community-based settings
- Improved housing retention (fewer evictions and abandoned apartments)
- Increased housing stability (fewer hospitalizations/emergency room visits, less interfacing with law enforcement, fewer tenant landlord disputes)
- Shorter length of stays in institutions
- Fewer re-admissions to institutions

RIHousing, EOHHS and BHDDH intend for the proposed PRA program to result in improved health outcomes, reduced service costs per beneficiary (particularly amongst homeless high Medicaid users), reduced chronic homelessness statewide and increased tenant income. RIHousing, EOHHS and BHDDH believe that pairing the PRA program with the interdepartmental data matching of homelessness (HMIS) and Medicaid information is a particularly innovative, replicable model that could become a best practice for reducing homelessness and lowering Medicaid expenditures.

Identify actions taken to overcome the effects of any impediments identified in the jurisdiction's analysis of impediments to fair housing choice. 91.520(a)

The most recent analysis of impediments to fair housing choice (AI) was completed in June 2020. The document is available at <https://ohcd.ri.gov/sites/g/files/xkgbur401/files/announcements/ai-2020-final.pdf>. The AI outlines the impediments to fair housing in RI, including: Inadequate supply of affordable housing that is accessible to persons with disabilities, provides a healthy home environment, and is located in higher opportunity areas; inadequate level of public transportation; public opposition to new affordable housing developments; inadequate level of funding to address affordable housing; and discriminatory behavior toward members of the protected classes.

Inadequate Supply of Affordable Housing

In 2023, the Speaker of the House, Speaker Shekarchi, introduced a package of 14 bills to streamline and simplify the development process. All but one became law. The package included bills that streamline the municipal review process for comprehensive permits and reduce steps in the zoning and planning review process. A package of 14 new bills in 2024 built on that progress including legislation that would streamline and incentivize the development of Accessory Dwelling Units (ADUs), as well as legislation to build the capacity of local planners and building inspectors and to transition to an electronic process for land development approvals.

Governor McKee's FY23 budget included the expansion of a program to provide additional investments in the development of affordable housing units and the allocation of SFRF resources for housing development, capacity building, and homelessness programs. The FY24 and FY25 budgets built on that initial investment. The total funding for FY22-FY25 allocated for housing production and preservation through SFRF resources totaled over \$200 million.

Inadequate Level of Public Transportation

The state's FY23 budget included the allocation of \$2.5 million of one-time American Rescue Plan Act (ARPA) funds to create a 1-year pilot program that offers free bus fare on the RIPTA R-Line. This program removes financial barriers to mobility for many lower-income residents, promoting more access to education, healthcare, and employment. The program began in September 2022.

Public Opposition to New Affordable Housing Developments

RI is currently experiencing a severe housing shortage. The House has extended two Commissions to focus on housing production. One targeted on improving the effectiveness of the State's Low- and Moderate-Income Housing Act has an added purpose to review housing affordability in RI; the other focused on land use practices that may hamper housing development.

In 2023, RIHousing and affordable housing developers continued ribbon-cuttings for completed affordable housing developments, highlighting how these attractive and high-quality developments are meeting community needs and represent an asset to the community.

RIHousing also launched the Municipal Technical Assistance Program (MTAP) through the state Housing Production Fund appropriation in the FY21 budget. \$4 million of the initial allocation has been made available for municipal technical assistance through MTAP. The program assists municipalities by providing techniques and tools to respond to resident opposition that is preventing development and engage the community in support of proposed affordable developments or proposed zoning/land use changes that would facilitate housing development.

Inadequate Funding Level

Governor McKee's FY23 budget included initiatives aiming to improve the stock of affordable housing in the state. The FY24 and FY25 budgets built on that initial investment. The total funding for FY22-FY25 allocated for housing production and preservation through SFRF resources totaled over \$200 million. The FY23 budget also included \$28 million for the State's Historic Preservation Tax Credit which funds

affordable housing development through the conversion of mill space or the preservation of very old multi-family housing stock.

Discriminatory Behavior Toward Members of the Protected Classes

In April 2021, Governor McKee signed legislation adding “Source of Income” as a protected class under the State’s Fair Housing Practices Act, preventing prospective tenants from being denied housing for owning a government housing voucher.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

HOME

RIHousing is the designated recipient of HOME Program funds from HUD on behalf of RI. RIHousing receives and administers funds provided by the HOME Investment Partnerships Act, which was created to provide funds to expand the supply of affordable housing for low-income persons.

RIHousing is responsible for monitoring the compliance with HOME program regulations of all HOME-funded units. RIHousing conducts all monitoring related to the State HOME Program.

This report covers July 1, 2023 through June 30, 2024, which correlates to Rhode Island's HUD Program Year 2023.

Monitoring Procedures

To ensure compliance with the requirements of HUD and Corporation Regulations, RI Housing conducts on-site inspections and financial oversight in accordance with 92.504. Annual file reviews and property inspections are conducted.

The 2013 HOME Final Rule requires that all HOME units committed funding after 1/24/15 will be required to be reviewed under the new Uniform Physical Condition Standards (UPCS) on an ongoing basis; however, as of present HUD has not yet provided additional guidance on these standards. In the interim, RIHousing has adopted policies from its HTF program that cross-reference Housing Quality Standards (HQS), Uniform Property Code Standards (UPCS), and RI Property Maintenance Code into one tool. Inspection reports are compiled based on either no findings or the type of finding (Health and Safety versus a Negative finding) within InspectCheck, a mobile inspection application adopted from our HOME program monitoring by the RIHousing compliance team.

If a property has findings during an inspection, a notice is issued to the owner to address repairs necessary to bring the unit up to the standard. Health and Safety findings must be repaired within 24 to 48 hours while negative findings may be addressed within 30 days. Owners are expected to evidence repairs and report back to the Asset Manager. When necessary, additional follow up inspections are scheduled.

While on-site, file reviews are also taking place. Tenants agree in their leases to provide information to the landlord on rents to complete occupancy reports. Each unit is assessed for compliance using information in the file reviews. Asset Managers also review for income documentation, prohibited lease terms, wait lists, etc. Notice is provided to owners regarding findings, and owners are given a timeframe to bring units to compliance.

For properties not receiving a physical visit to the site, tenant data is being reported and reviewed via an online software application called Web Tenant Compliance (WTC) that allows Asset Managers to review tenant data, income, rents, and utility allowances. For sites that are not in compliance with applicable regulations, a notice is sent with a timeframe for compliance outlined.

Once an acceptable response to findings has been received, the file is closed until the next inspection. Owners are encouraged to contact the Asset Manager or Ancillary Program Manager throughout the year with any questions and technical assistance is provided on an on-going, as-needed basis.

Site Visits Conducted

92.251(f) requires RI to have ongoing property standards to ensure that owners of assisted rental housing maintain the housing as decent, safe, and sanitary housing in good repair. The 2013 rule changes established the following standards:

- For all units to which HOME funds were committed after 1/24/15, the ongoing unit inspection standard is all applicable state/local occupancy codes, or, in the absence of state/local codes, UPCS can be applied (§92.251(f)(1)(i)); and

- For projects committed prior to 1/24/15 (now deferred), the standard is applicable state/local codes, or HQS in the absence of state/local codes (§92.251(f)(2)).

The State of RI Housing Maintenance and Occupancy Code (Chapter 45-24.3) is the standard that must be applied, and it applies to all HOME projects, regardless of the timing of the project commitment.

To implement the new property standards and the policy outlined herein, RIHousing should have:

- An inspection form based on the RIHousing Maintenance and Occupancy Code filled out for each inspected unit; and

- A list of life-threatening health & safety items that must be corrected immediately if found (§92.251(f)(1)(ii)). The InspectCheck application used by Compliance Specialists in the field complies with both of these items.

Inspections are based on a statistically valid sample of units appropriate for the size of the HOME-assisted project, as set forth by HUD through notice. For projects with one to four HOME-assisted units, 100 percent of the HOME-assisted units are inspected. The HOME rule does not require inspections and file reviews to be from identical units.

Timing of Inspections

HOME Final Rule requires every rental project be monitored during its first year of occupancy (§92.504(d)(1)(ii)(A).) While file reviews and inspections are required during this visit, RIHousing also focuses on correct application of occupancy requirements and standard rent-up activities such as adherence to Tenant Selection and Affirmative Marketing Plans (as applicable).

Monitoring is required to occur every 3 years, or more frequently if there is significant noncompliance or

other risk factors. Dates of recent inspections can be viewed in Appendix A. These onsite monitoring visits include sample unit inspections and review of occupancy files to determine compliance report accuracy and adequate documentation as discussed in Section 3.8 “Monitoring” of RIHousing HOME Policies and Procedures Manual. Standard procedures of Asset Management & Compliance will be used, with attention to the HOME requirements summarized in this Section and in Section 5 “Ongoing Project Monitoring”.

Criteria to assess risk include program knowledge and experience, physical conditions of properties, response time to program and compliance staff, timing of annual tenant certifications, vacancy rates, and previous noncompliance findings.

There are 3 rating levels:

-Green: Least amount of risk with on-site monitoring of HOME every three years. This level reflects knowledge, experience, and compliance with the HOME program, as well as a stable and financially sound developer and management team. Developer receives preference for future funding.

-Yellow: Some risk present with on-site monitoring of HOME to occur every two years. This level reflects some prior findings, responsiveness to program and compliance staff, a basic knowledge and experience with the program, and a willingness to learn and engage to improve performance. Developer would be considered for funding and may receive conditional preliminary reservation based on improved performance.

-Red: Highest risk with on-site monitoring of HOME to occur every year. This level reflects multiple current and prior physical and/or file review findings, a lack of responsiveness or slow response to program and/or compliance staff, little to no knowledge and experience with the HOME program and/or housing in general, and poor financial performance for the owner and/or property. Developer would not pass threshold requirements in application process.

It is also worth noting that if a property is not complete or has not undergone its first inspection at the date of reporting, it is rated as “blue”. Risk ratings are incorporated into Attachment A.

Analysis of Monitoring Results

Inspection information at the project and unit level is maintained in project files at Rhode Island Housing and is available for physical inspection in the office.

Physical Findings

Of the 81 developments inspected in PY23, there were 115 individual findings, approximately 45% were Health and Safety violations that required immediate action on the part of the owner. These properties had 24-48 hours to bring units back into compliance. Most common Health and Safety violations included: inoperable smoke detectors, blocked egress, and the improper storage of flammables/combustibles. All of these violations have been addressed and closed. 55% of findings were general to violations of UPCS/HQS and Rhode Island Property Maintenance Code. Typical violations include stained/damaged flooring, overgrown vegetation, cracked electrical faceplates with no exposed

wires, and torn refrigerator gaskets/seals. Most of these findings have been satisfactorily addressed and closed shortly after the monitoring was conducted.

File Findings

File reviews occurred for 81 HOME-assisted rental projects. Key findings were addressed throughout the Program Year. RIHousing Compliance staff documented an increase of late certifications due to COVID-19; 64 files had Income/Asset findings and/or missing or incomplete information. There were 20 findings related to proper verification of student status, and 15 findings related to a missing or outdated HOME Lease Addendum.

RIHousing's Interim Inspection/Monitoring Policy took effect on April 1, 2020 and remains in effect. All HOME file audits are performed remotely, and files are uploaded to the asset manager via SharePoint. RIHousing uses SharePoint to facilitate the remote review. RIHousing's SharePoint site is hosted on Microsoft's secure Azure Government Cloud, which offers security, protection, and compliance services generally suitable for government purposes. Particular security features include data encryption; virus detection; and control of access, permissions, and sharing. Azure Government uses datacenters and networks located in the U.S. only.

Annual Rent/Utility Allowance Approval and Desk Monitoring

RIHousing utilizes a web-based online module (Web Tenant Compliance or "WTC") that captures tenant information for all HOME Program assisted units. All HOME Program assisted properties will have 60 days from the date of the Program Bulletin announcing the annual HUD Published Rent to update the required household occupancy and demographic information using WTC. This information will be used to conduct Desk Reviews and Annual Rent Approvals.

RIHousing's Asset Management staff members analyzed 100% of the HOME portfolio which included current rent and utility allowance as well as occupancy information submitted through WTC. RIHousing communicates the approval or disapproval or compliance issues with the owner/manager. If the rent and utility allowances are not approved, the owner/manager will be provided with information to assist curing any non-compliance with the HOME Program regulations.

CDBG

The State of RI has developed and implemented a recipient review system. The purpose of this system is to determine whether recipients have carried out CDBG activities in a timely manner and in accordance with the primary objectives, applicable laws, regulations, and executive orders.

RI has developed a CDBG Management Handbook that instructs communities on the various regulations of the program and requires program recipients to submit written progress reports.

The Quarterly Progress report includes data relative to the extent to which persons or households have benefited from CDBG activities as well as status narratives. The program Close-Out report requires recipients to provide all accomplishment information at the completion of funded activities.

Tracking and review of these reports constitutes a major portion of the off-site recipient review.

The State Community Development staff reviews all reports and requests for technical assistance and gives weight to each of the following criteria (risk-based approach) when scheduling on-site monitoring in an effort to ensure that visits take place at the most optimum time.

1. Towns with identified management concerns which may impact the local administration of the CDBG program
2. Close-Out requests reviewed
3. New CDBG administrative staff
4. Stalled programs
5. Complexity of the projects
6. Projects with no prior review
7. Town with audit findings
8. Requests for assistance
9. Standing of grants, percentages of funds drawn
10. Community's past performance

On-site monitoring visits are documented in a monitoring report. This report is submitted with a cover letter summarizing any finding and indicating actions necessary to resolve them.

The RI Department of Housing (RIH) will carry out the statutorily mandated responsibility to review Recipient performance as cited in CDBG regulations: 24 CFR 85.40(a), 24 CFR 570.492(a)(b), and 24 CFR 570.501(b).

The Monitoring Plan facilitates RIH to make informed judgments about Recipients' program effectiveness, efficiency, and their ability to prevent fraud, waste, and abuse of public funds.

Levels of Monitoring

RIH monitors CDBG Recipients in two ways.

In-House Review: Also known as a Desk Review, the in-house review will be conducted a minimum of once a year for each open grant. RIH staff reviews material on file at RIH, and/or may request specific files from Recipients. Material reviewed may include:

- The Application for CDBG funding
- Environmental Review Record
- Quarterly and semi-annual performance reports;
- Budget or program amendment requests;
- Drawdown requests;
- Documentation of previous monitoring; and
- Copies of audits whether by an Independent Public Accountant or the General Accounting Office

Review of this information allows staff to understand changes in the Recipients' activities, and to identify potential problem areas to examine during a site visit. An in-house monitoring checklist is used to provide a record of each review.

Risk Analysis: Risk Analysis enables RIH to identify the Recipients to be monitored on-site and remotely, the program areas to be covered, and the depth of the review. Risk Analysis consists of two steps:

1. Rating: Assessing and recording risk for each grantee. This task will be performed annually in January.
2. Ranking: Ranking Recipients in three categories of risk: high, medium, and low.

The results of this two-step process provide the basis for developing an office work plan and individual Recipient monitoring strategies.

RIH will use the risk-assessment criteria, in addition to in-house review, to prioritize Recipients for monitoring on-site. Quantitative risk values will be assigned to each criterion to facilitate calculation of an overall risk score and ranking order. A Recipient determined to have high risk levels will require on-site monitoring. High-risk Recipients might:

- be new to the CDBG program;
- have experienced turnover in key staff positions or a change in goals or direction;
- have previous compliance or performance problems including failure to meet schedules, submit timely reports or clear monitoring or audit findings;
- show a pattern of errors or inaccuracies in submitted reports and draws;
- have higher funding allocation;
- have more complex programs and/or activities;
- carry out high-risk activities such as economic development; and
- undertake multiple CDBG activities for the first time.

Interim Review: This monitoring may be conducted in office or on-site, depending upon the selected activities or operating procedures to be examined. Recipients are selected for Interim Review based upon risk assessment as described above. An interim review might examine:

- Area(s) of the Recipient's operation where the regulations have changed or been clarified;
- New activities the Recipient is undertaking
- Activities administered by a sub-recipient
- Aspects of a Recipient's operations that led to monitoring recommendations in the past
- Other issue areas as identified during in-house review and/or risk assessment

On-Site Review: It is the Department of Housing's policy to conduct a minimum of one on-site monitoring for each active CDBG contract prior to closeout. Monitoring visits throughout program implementation may be scheduled based on project and Recipient performance and risk. On-site technical assistance visits are performed as needed/requested. Prior to closing out a grant, on-site review will examine Recipients' performance in the following CDBG compliance areas, as applicable:

- National Objective Compliance
- Eligibility
- Record-Keeping Systems
- Financial Management
- Non-Discriminations and Actions to Further Fair Housing
- Environment

- Labor Standards
- Citizen Participation
- Procurement
- EEO/Section 3
- Rehabilitation
- Economic Development
- Public Services
- Public Facilities and Improvements
- Acquisition, Disposition, Relocation
- Planning & Administration

The entirety of the CDBG Monitoring requirements is available at the Rhode Island CDBG Monitoring Handbook, which is Appendix E of the CDBG Policies and Procedures Manual, which is accessible to the public at <http://ohcd.ri.gov/community-development/cdbg-dr/general-resources/cdbg-procedure-manual-201510.pdf>

ESG

Program Monitoring Overview

The CHF uses monitoring to help CHF/ESG sub-recipients who receive funding through the Consolidated Homeless Fund to identify problems or potential problems, and to help sub-recipients correct them. The objectives of CHFP monitoring are to determine if Sub-recipients are:

- Carrying out activities as described in their contracts (as modified or amended).
- Carrying out the program in a timely manner, in accordance with the CHFP contract.
- Charging only eligible costs to the program or project.
- Complying with other applicable laws, regulations and terms of the CHFP contract.
- Conducting the program in a manner that minimizes the opportunity for fraud, waste and mismanagement.

Management of Monitoring Activities

CHF staff (***RIH for State Contracts and the respective entitlement staff for their local contracts***) monitors Sub-recipients' performance utilizing a combination of desktop and on-site monitoring.

Desktop Review Monitoring - Desktop review monitoring is an on-going process of reviewing grantee performance that uses all available data in making judgements about grantee performance and is conducted by the CHF or the respective ESG entitlement community.

Analysis of the data may indicate the need for a special monitoring visit to resolve or prevent a problem.

On-Site Monitoring- In addition to desktop monitoring, CHF staff may conduct an on-site monitoring visit. These visits shall be conducted as necessary. Areas to be monitored may include:

- Project Progress
- Overall Program Management

- Shelter/Facility
- Policies and Procedures (especially those relating to the ESG Program)
- Contract Management
- Financial Management
- HMIS and Data Tracking
- Client File Review
- Record Keeping

Sub-recipients are contacted at least one month prior to the planned date of an on-site monitoring to schedule. Once a date has been set, a formal written letter is sent to confirm:

- The date and time of the visit;
- The names and titles of the staff conducting the monitoring;
- The elements of the program to be monitored; and
- The files and records to be reviewed.

1. During the On-Site Monitoring- CHF staff complete the following steps when conducting an on-site monitoring:

- Conduct an entrance conference with the executive director, director of programs, or other sub recipient official to explain the purpose and schedule for the review.
- Interview members of the sub recipient staff to gather information about sub recipient's activities and performance.
- Review additional materials provided by the sub recipient that provide more detailed information about the program/project.
- Examine a sample of expenditures for required documentation and to verify the accuracy of information provided on invoices.
- Perform a fiscal review of the program to assure compliance with applicable OMB circulars.
- Review a sample of client files for required documentation that program participants meet eligibility requirements and that they are provided access to supportive services.
- Hold an exit interview with appropriate subfreezing staff to discuss the preliminary conclusion of the review and identify any follow-up actions the sub recipient will need to take.

2. Monitoring Results - Within 60 days after completion of monitoring, CHFP will send written correspondence to the sub recipient describing the results – in sufficient detail to clearly describe the areas that were covered and the basis for the conclusions. Each monitoring letter will include:

- Date(s) of the monitoring.
- Name(s) and title(s) of the CHFP staff person who performed the monitoring review.
- A listing of the program activity areas reviewed.
- A brief explanation of the reasons why an area specified in the notification letter was not monitored.
- Monitoring conclusions supported by facts.
- Clearly labeled findings and concerns.
- If there are findings, an opportunity for the sub recipient to demonstrate, within a time prescribed by HUD, that the participant has complied with the requirements.
- Due date of required action.

-An offer of technical assistance, if needed, or a description of technical assistance provided during the monitoring.

HOPWA

The HOPWA Program is managed by the CHF, and therefore follows the same monitoring process as the CHF described above.

CoC

The RICOc conducts its annual program monitoring exercise through its designated collaborative applicant agency, RIHousing. In PY23, RIHousing contracted with an independent consulting firm to coordinate risk assessment, and either desk audit or a full monitoring exercise with each CoC recipient and subrecipient agency based on the risk assessment. Monitoring includes review of a sample set of Program files, organizational capacity (i.e., financial management capabilities, grant management skills, and program management competencies), consumer satisfaction, and adherence to HUD Standards. A report of annual monitoring findings goes to the agency, the RICOc Planner, and RICOc Board. A cumulative report identifying themes noticed during monitoring informs an annual training plan as is necessary for the RICOc to address areas for improvement.

Citizen Participation Plan 91.105(d); 91.115(d)

After the end of each program year, the State of Rhode Island will develop an “Annual Performance report” in accordance with HUD regulations. This report will describe the State’s progress in carrying out its strategic and action plan, including a description of the resources made available, the investment of available resources, the geographic distribution and location of investments, the families and persons assisted (including the racial and ethnic status of persons assisted), actions taken to affirmatively further fair housing, and other actions indicated in the strategic plan and the action plan.

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

In accordance with the Citizen Participation Plan, a posting was published in the Providence Journal and Noticias on September 5, 2024, which announced the comment period for the CAPER, which lasted 15 days. The public notice included details on what the Consolidated Annual Performance and Evaluation Report (CAPER) would contain, which it is drafted and submitted, and the dates for which the report covers. The public notice also included information on how to access a draft of the CAPER, which was made available online at Rhode Island Housing’s and the State Department of Housing’s website on September 5, 2024. The public was informed through the public notice that the comment period for the draft CAPER would be open until September 20, 2024. No comments were received from the public during the 15 day period.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The State has generally maintained priorities (housing, economic development, and neighborhood revitalization) and program objectives as implemented in prior program years. No significant changes to the program design are being executed at this time.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

The State does not have any active BEDI grants to report.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

Not applicable

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

Rhode Island Housing adopted the affirmative marketing requirements of 24 CFR 92.351 in the Rules and Regulations approved for the HOME Program. Affirmative marketing requirements are specified in the agreement between Rhode Island Housing and all recipients of HOME funds. Every year the HOME Program staff work to ensure that HOME recipients are familiar with the requirements of the Fair Housing Act. Recipients with five or more HOME-assisted affordable homes are provided with information on affirmative marketing and minority outreach programs. Rhode Island Housing maintains an extensive list of local and regional minority community media resources for their marketing and outreach efforts.

Rhode Island Housing continues to increase its own outreach efforts by expanding the number of minority organizations to which it sends its notice of available funding. Rhode Island Housing's Department of Communications works closely with all minority communities to promote fair housing and affirmative action.

Rhode Island Housing's HOME application includes the Affirmative Fair Housing Marketing (AFHM) Plan #2529-0013. Affirmative marketing documentation is also compiled at the completion of a project and is reviewed on an annual basis during monitoring visits by HOME Program staff. HOME staff assesses the effectiveness of a sponsor's outreach and marketing efforts and ensures compliance with affirmative marketing requirements. Depending on the type of project being funded, sponsors may utilize different methods to affirmatively market their affordable homes. In addition, all newly financed affordable housing units must be listed on the new HomeLocatorRI.net website.

Rhode Island Housing actively markets homeownership opportunities to minorities and other underserved populations by conducting workshops, pre-qualifying people for mortgages and counseling those with credit or other financial problems.

No emergency transfers were requested pertaining to victims of domestic violence, dating violence, sexual assault, or stalking.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

\$120,076.67 in program income was expended in PY 2023.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing).

91.320(j)

13 HOME rental units and 0 homeownership units were completed in 2023. \$7,650,170.02 in total HOME funds was expended in the program year. 97 HOME units are currently under construction. (32 are nearing construction completion and will be leased up in calendar year 2024. HOME loans to support the construction of 24 HOME-assisted units will close in 2024. 55 HOME-assisted have received preliminary commitments and will begin construction in 2025. All are part of LIHTC developments.

CR-56 - HTF 91.520(h)

Describe the extent to which the grantee complied with its approved HTF allocation plan and the requirements of 24 CFR part 93.

Compliance with HTF allocation plan:

49 HTF-assisted units are currently under construction. 25 of them are 99% complete and will lease up in 2024. (Covid-related supply chain delays prevented more timely completion.) Loans for 13 additional HTF-assisted units will close in 2024. 28 HTF-assisted units have received preliminary commitments with loan closings expected in calendar year 2025.

Compliance with the requirements of 24 CFR part 93:

All HTF funds administered by RIHousing provide housing for Extremely Low-Income families. In accordance with 24 CFR Part 93, RIHousing allocates 10% of its grant to program planning and administration costs; the balance of the grant provides capital funding for new construction or rehabilitation of housing units. All HTF rental housing agreements provide for a minimum affordability period of 30 years.

Occupants of HTF assisted units are income eligible as required by 24 CFR 93.151, and income targeting requirements described in 24 CFR 93.250 are followed regardless of the annual allocation for HTF funds.

The only eligible activity for the state’s HTF program is new rental housing. This is in compliance with the HTF eligible activities provided for in 24 CFR 93.200. In selecting projects for funding, RIHousing ensures that sites for the proposed new construction meet requirements in 24 CFR 983.57(e)(2).

In compliance with 24 CFR 93, RIHousing has policies regarding HTF-assisted units that include: eligibility as affordable rental housing, maximum per unit development subsidy amounts, underwriting, subsidy layering, property standards, tenant protections and selection, and other applicable Federal requirements described in the Method of Distribution.

Tenure Type	0 – 30% AMI	0% of 30+ to poverty line (when poverty line is higher than 30% AMI)	% of the higher of 30+ AMI or poverty line to 50% AMI	Total Occupied Units	Units Completed, Not Occupied	Total Completed Units
Rental	3	0	0	3	0	3
Homebuyer	0	0	0	0	0	0

Table 15 - CR-56 HTF Units in HTF activities completed during the period

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0	63,513	0	0	63,513
Total Section 3 Worker Hours	0	0	0	0	0
Total Targeted Section 3 Worker Hours	0	0	0	0	0

Table 16 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	0	0	0	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0	0	0	0
Direct, on-the-job training (including apprenticeships).	0	0	0	0	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0	0	0	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0	0	0	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0	x	0	0	x
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0	0	0	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0	0	0	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0	0	0	0
Held one or more job fairs.	0	0	0	0	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0	0	0	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0	0	0	0
Assisted residents with finding child care.	0	0	0	0	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0	0	0	0
Assisted residents to apply for, or attend vocational/technical training.	0	0	0	0	0
Assisted residents to obtain financial literacy training and/or coaching.	0	0	0	0	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0	0	0	0
Provided or connected residents with training on computer use or online technologies.	0	0	0	0	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0	0	0	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0	0	0	0
Other.	0	4	0	0	3

Table 17 – Qualitative Efforts - Number of Activities by Program

Narrative

One HOME activity and one HTF activity is subject to Section 3 compliance during this reporting period. They did not meet Section 3 benchmarks, but qualitative efforts were made.

RIHousing has revised policies and procedures and systems to comply with the requirements of the final rule at 24 CFR part 75 and has a designated Section 3 Compliance Officer actively working with developers and contractors on program requirements and Qualitative Efforts for those failing to meet benchmark requirements.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in e-snaps

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	RHODE ISLAND
Organizational DUNS Number	113928944
EIN/TIN Number	050354769
Identify the Field Office	BOSTON
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

ESG Contact Name

Prefix	Ms.
First Name	Tara
Middle Name	
Last Name	Booker
Suffix	0
Title	Director of Homelessness

ESG Contact Address

Street Address 1	80 Washington Street
Street Address 2	0
City	Providence
State	RI
ZIP Code	02903
Phone Number	
Extension	0
Fax Number	
Email Address	Tara.booker@housing.ri.gov

ESG Secondary Contact

Prefix	Mr.
First Name	Benjamin
Last Name	Haynie
Suffix	0
Title	Chief of Program Development
Phone Number	401-523-0071
Extension	0
Email Address	Benjamin.haynie@housing.ri.gov

2. Reporting Period—All Recipients Complete

Program Year Start Date	07/01/2023
Program Year End Date	06/30/2024

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: Amos House
City: Providence
State: RI
Zip Code: 02907
DUNS Number
Is subrecipient a victim services provider: No
Subrecipient Organization Type: Non-profit
ESG Subgrant or Contract Award Amount:

Subrecipient or Contractor Name: Crossroads
City: Providence
State: RI
Zip Code: 02903
DUNS Number
Is subrecipient a victim services provider: Yes
Subrecipient Organization Type: Non-profit
ESG Subgrant or Contract Award Amount:

CR-65 - ESG 91.520(g)- Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities:

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 18 – Persons Assisted – Homelessness Prevention

4b. Complete for Rapid Re-Housing Activities:

Number of Persons in Households	Total
Adults	21
Children	26
Don't Know/Refused/Other	0
Missing Information	0
Total	47

Table 19 – Persons Assisted – Rapid Re-Housing

4c. Complete for Shelter:

Number of Persons in Households	Total
Adults	215
Children	45
Don't Know/Refused/Other	0
Missing Information	0
Total	260

Table 20 – Persons Assisted – Shelter

4d. Street Outreach:

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 21 – Persons Assisted – Street Outreach

4e. Totals for all Persons Served with ESG:

Number of Persons in Households	Total
Adults	236
Children	71
Don't Know/Refused/Other	0
Missing Information	0
Total	307

Table 22 – Persons Assisted – ESG

5. Gender - Complete for All Activities

Number of Persons in Households	Total
Male	129
Female	174
Transgender	3
Don't Know/Refused/Other	1
Missing Information	0
Total	307

Table 23 – Gender of Persons Assisted

6. Age - Complete for All Activities

Number of Persons in Households	Total
Under 18	71
18-24	24
25 and over	212
Don't Know/Refused/Other	0
Missing Information	0
Total	307

Table 24 – Age of Persons Assisted

7. Special Populations Served - Complete for All Activities

Subpopulation	Total	Total Persons Served - Prevention	Total Persons Served - RRH	Total Persons Served in Emergency Shelters
Veterans	2	0	0	2
Victims of Domestic Violence	75	0	1	74
Elderly	3	0	0	3
HIV/AIDS	3	0	0	3
Chronically Homeless	64	0	5	59
Persons with Disabilities:				
Severely Mentally Ill	167	0	2	165
Chronic Substance Abuse	67	0	0	67
Other Disability	0	0	0	0
Total (Unduplicated if possible)	450	0	10	440

Table 25 – Persons Assisted – Special Populations Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units – Rehabbed	0
Number of New Units – Conversion	0
Total Number of bed - nights available	0
Total Number of bed - nights provided	0
Capacity Utilization	0

Table 26 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

The State of Rhode Island utilized two outcomes to document the successes and challenges of the ESG program. Outcome 1 measured the number of exits to positive destinations, including exits to permanent housing. A total of 61 clients exited from State ESG programs, of this amount 56 exited to positive destinations or roughly 91.80%. Outcome measure 2 pertained to the number of exits to emergency Shelter. Only one client exited to an emergency shelter and four others moved to a temporary living situation.

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	0	0	0

Table 19 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Expenditures for Rental Assistance	0	\$17,093.40	\$34,342
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	\$329,282	0	\$3750.00
Expenditures for Housing Relocation & Stabilization Services - Services	\$224,596	0	0
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	\$553,878	\$17,093.40	\$38,092

Table 20 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Essential Services	\$11,851	0	\$351,761.06
Operations	0	0	\$50,923.04
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	\$11,851	0	\$402,684.10

Table 21 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Street Outreach	0	0	0
HMIS	0	\$298,009.37	0
Administration	\$53,915	\$53,256.00	0

Table 22 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2021	2022	2023
	\$619,644	\$368,358.77	\$440,776.10

Table 23 - Total ESG Funds Expended

11f. Match Source

	2021	2022	2023
Other Non-ESG HUD Funds	\$170,000	0	0
Other Federal Funds	0	\$116,243.40	\$60,694.42
State Government	\$645,072	\$273,555.42	0
Local Government	\$15,000	0	0
Private Funds	0	0	\$255,284.60
Other	0	0	\$185,992.39
Fees	0	0	0
Program Income	0	0	0
Total Match Amount	\$830,072	\$389,798.82	\$501,971.41

Table 24 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2021	2022	2023
	\$1,449,716	\$758,157.59	\$942,747.51

Table 25 - Total Amount of Funds Expended on ESG Activities