

Rhode Island
SECOND
Year Annual Action Plan
2025-2029

Program Year 2026
July 1, 2026 – June 30, 2027

Contact:

Rachel Flaherty
Director of Policy and Evaluation
RI Executive Office of Housing
One Capitol Hill, 3rd Floor
Providence, R.I. 02908
Rachel.Flaherty@housing.ri.gov

Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b) Introduction

The State of Rhode Island's Annual Action Plan serves as an application to the Department of Housing and Urban Development (HUD) for funding of the Community Development Block Grant Program (CDBG), HOME Investment Partnerships Program (HOME), the National Housing Trust Fund Program (HTF) and Emergency Solutions Grant Program (ESG). The Annual Action Plan also provides a forum for Rhode Island to summarize the State's progress and new initiatives in support of the strategic goals identified in the Consolidated Plan.

The State of Rhode Island, Executive Office of Housing (EOH) and Rhode Island Housing (RIHousing) completed this Annual Action Plan. Jointly, these agencies undertook a lengthy planning process for the 2025-2029 State of Rhode Island Consolidated Plan. The current Annual Action Plan has been developed in accordance with the goals set during the coordinated planning.

a. Objectives and Outcomes Identified in the Plan

The State of Rhode Island's 2025-2029 Consolidated Plan outlines the main objectives, priorities, and strategies for the delivery of funds to address housing and community development needs for low- and moderate-income households. In this coming program year of the 2025-2029 plan, Rhode Island will continue to evaluate and address the overarching priorities identified in the Consolidated Plan. These include:

- Increase housing opportunities for low-to-moderate income households
- Preserve existing affordable housing
- End homelessness
- Adapt aged housing to fit residents' needs
- Eliminate lead hazards
- Make infrastructure improvements
- Make investments in public services and facilities
- Increase transitional housing for persons in recovery with substance abuse disorders
- Develop permanent supportive housing
- Remove barriers to fair and affordable housing

The strategies set forth in the Annual Action Plan for the coming program year seek to address how resources are leveraged and partnerships created to consistently meet the housing needs of Rhode

Island's at-risk populations. Performance expectations include 50 rental units constructed or rehabilitated, 10 units of homeowner housing added and 75 units of homeowner housing rehabilitated, approximately 2,000 persons assisted through the state's homeless shelters, an increased emphasis on all aspects of healthy homes, and thousands of persons assisted by investments in non-housing community development. These strategies are especially aimed to address the needs of extremely and very low-income households, special needs populations and homeless populations as discussed below.

b. Evaluation of past performance

This Annual Action Plan represents the second year of implementation of the objectives set forth in the 2025-2029 Consolidated Plan. Ninety days after the close of the state's HUD Program Year (July through June), the State submits the Consolidated Annual Performance Evaluation Report (CAPER); this year's CAPER is due for submission to HUD from the state by September 28, 2026. The CAPER will include the accomplishments only for the 2025 program year.

The Executive Office of Housing and the state's housing finance agency, RIHousing, have worked to produce safe and affordable housing for thousands of state residents while providing rental assistance and supportive services to thousands more.

The federal Low Income Housing Tax Credit program, administered by RIHousing since 1986, has over 10,000 active units for which it has financed construction. RIHousing has also administered the federal HOME Program since 1992, with the program financing the development of over 3,000 affordable units. The HFA also administers funding for more than 17,000 renters (through project-based and tenant-based rental assistance programs) and has remediated lead- paint or other home health hazards in more than 450 homes across Rhode Island since 2016.

State lawmakers and citizens see that these housing programs have important and lasting effects on communities and the economy. Rhode Island voters have passed five housing bonds, in 2006, 2012, 2016, 2021 and 2024 (2006 - \$50M; 2012 - \$25M; 2016 - \$50M; 2021 - \$65M; and 2024 - \$120M). The combined \$190 million in state funding from the first four bonds was allocated to support the development or preservation of 4,240 affordable homes in the state. A number of programs are getting underway now with funding from the 2024 bond.

c. Summary of Citizen Participation and Consultation Process

Throughout the Consolidated Plan development process in 2024, the State and RIHousing consulted and met with other public and private agencies to gather data and discuss the state's housing and community development needs and priorities to be included in the plan.

Agencies consulted included health and social services agencies, public housing authorities, city and municipal representatives, housing developers and providers (see State of Rhode Island

Consolidated Plan 2025-2029). To encourage citizen participation, RIHousing and the state's Executive Office of Housing offered a variety of opportunities for citizens to participate in the planning process.

Efforts continue to be made to promote and encourage citizen participation in the Annual Action Plan preparation process. Documents will be made available for review by the public through EOH and/or RIHousing's websites. The notice will be published at least two (2) weeks before the actual hearing date in a general circulation newspaper, as well as a newspaper that primarily serves minority communities. The hearing will be held at a time that is convenient to potential beneficiaries, and accommodated persons with disabilities and non-English speakers.

This Annual Action Plan will be issued on April 16th for a 30-day public comment period. The draft plan was posted at housing.ri.gov and www.rihousing.com. An English language advertisement ran in the Providence Journal and a Spanish language advertisement ran in Noticias Rhode Island. The Annual Action Plan public hearing will be held in person on **Thursday, April 30th, 5:00-6:00pm** at the RI Department of Administration, 1 Capitol Hill, Providence, RI 02908, Second Floor conference room 2A.

When completed, the Annual Action Plan will be available at housing.ri.gov and www.rihousing.com and copies of the Annual Action Plan will be sent to the Rhode Island State House Library. Hard copies of the plan will also be available to citizens upon request.

d. Summary of Comments or Views

TBD after public hearing.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

TABLE I – LEAD AGENCY INFORMATION

Agency Role	Name	Department/Agency
Lead Agency	Rhode Island Executive Office of Housing (EOH)	Rhode Island Executive Office of Housing (EOH)
HOME, HTF	Rhode Island Housing (RIHousing)	RIHousing (state housing finance agency)
CDBG ESG and HOPWA Programs	Rhode Island Executive Office of Housing (EOH)	Rhode Island Executive Office of Housing (EOH)

Narrative

The Annual Action Plan was developed by the Rhode Island Executive Office of Housing (EOH), a state government department, in collaboration with RIHousing, the state’s quasi-public housing finance agency.

Consolidated Plan Public Contact Information

Rachel Flaherty
 Director of Policy & Evaluation
 Executive Office of Housing
 One Capitol Hill
 Providence, R.I. 02908
 (401) 222-2592
 Rachel.Flaherty@housing.ri.gov

AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

Introduction

The implementation of strategies defined in the Consolidated Plan and the PY26 Action Plan is carried out by dozens of state agencies, departments, and quasi-public entities, working together with a network of for-profit and nonprofit service providers and housing developers.

EOH and RIHousing formally consult with the network of housing service providers and communities when developing plans and programs. In less formal partnerships, RIHousing and EOH consult with health and human service agencies and providers to find intersections of need and to pool resources where possible.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies (91.215(l))

Medicaid is an important funding source for supportive housing services, and changes to Medicaid are encouraging better coordination among stakeholders. Three health plans serve Rhode Island's 317,000 Medicaid members. State agencies working with Medicaid members will continue to work on initiatives that support the goal of reducing healthcare costs through offering stable and secure housing.

RIHousing was awarded a two-year grant in 2022 to build strategies, organize resources, identify partnerships and develop innovative approaches to align housing and healthcare investments within Rhode Island. While the grant ended in December 2023, its deliverables were designed to continue the impact of the initiative in RIHousing's future endeavors:

(1) the RIHousing Healthy Housing, Healthy Communities (H3C) Plan summarizes RIHousing's accomplishments during the two-year initiative and its forward facing goals to continue its progress, and (2) the Rhode Island Health and Housing Tool Kit and accompanying Appendix were developed to support partnership development to deliver housing and health programs. RIHousing released multiple RFPs in 2023, 2024 and 2025 for Health and Housing Pilot programs, which will support the colocation or care coordination of healthcare services within RIHousing financed developments. Additionally, in 2025, RIHousing solicited an RFP for an external firm to conduct an evaluation of the pilot programs and measure their effectiveness of reaching the programs goals and associated impacts. To date, RIHousing has funded eight (8) pilot programs for 3-year terms throughout RI, and the evaluation will be conducted from 2026-2028.

EOHHS continued its Medical Respite Care pilot in PY2023 in partnership with medical care, behavioral health, and social service agencies. Medical Respite is non-permanent acute and post-acute care for persons experiencing homelessness who are too ill or frail to recover from illness or injury on the streets but are not ill enough to be in a hospital.

Money Follows the Person (MFP) Demonstration Program: MFP is designed to increase options for elderly and persons with disabilities to receive care in the community. National and local findings of MFP efforts emphasize how the lack of affordable, accessible housing is the biggest barrier, keeping too many persons in expensive, full-time institutional settings instead of at home receiving similar care. MFP has created a housing working group to understand what organization and community services already exist for the elderly and disabled population.

RIHousing received \$5.6 million in 2015 to administer the Section 811 Project Rental Assistance Program, a project that provides 150 units of project based rental assistance to affordable housing projects that serve extremely low-income persons with disabilities. The program is a partnership that also includes EOHHS and BHDDH, who oversee the provision of associated supportive services to clients in the program. All 150 units awarded to RIHousing are under a rental assistance contract with a local development in PY2025. To continue to expand this resource locally, RIHousing is requesting an expansion of units on its existing section 811 program from HUD to serve up to 20 additional units under the program in PY 2026. Additionally, RIHousing has already planned to coordinate with BHDDH and on an anticipated application for new 811 PRA funding for an additional \$7-10 million dollars. If awarded, that application would create 150 additional 811 PRA units beginning in PY2027.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

A Continuum of Care assists individuals and families experiencing homelessness or those at-risk of homelessness, and provides the housing and support needed to rapidly and permanently end their homelessness and maintain stable housing. The Continuum of Care program promotes community wide planning and strategic use of resources to address homelessness, improve coordination and integration with mainstream resources and other programs targeted to people at risk of or experiencing homelessness, and improve data collection and performance measurement that allows each community to tailor its program to the particular strengths and challenges within that community. Rhode Island has a single, statewide Continuum of Care (RiCoC) and RIHousing is the designated RiCoC Collaborative Applicant and therefore responsible for overseeing its annual funding competition, compliance processes, system planning and policy oversight. Towards those goals, RIHousing employs two full time Continuum of Care Planning Staff. These Planners oversee the Continuum of Care and manage its operations and accountabilities.

The Continuum of Care (CoC) is organized into several standing committees to carry out the day-to-day work of the Continuum and to support the operation and evaluation needs of CoC-funded programs and collaborates with the Executive Office of Housing (EOH) on the administration of ESG-funded programs. The CoC and its committees use a targeted case conferencing approach as needed and a universal assessment with the goal of housing targeted populations in the most appropriate housing and to inform policy makers about policies which create barriers to successful placement. The standing committees focus on the following subpopulations: Veterans, Families, Unaccompanied Youth, Survivors of Domestic

Violence, and High Acuity Individuals. The Committees also share resources and conduct gap analysis on behalf of these subpopulations and make recommendations to the CoC Board for policy changes, funding considerations, and advocacy as needed. The CoC board approves and ratifies the recommendations of these CoC committees; the Board is represented by program staff that also consults in the operation of ESG, CDBG, HOME and HTF funds.

The CoC uses a housing-focused strategies to place families and individuals quickly into housing without prerequisites and each housing opportunity provides wrap-around services to support the client in maintaining their housing. The CoC uses HMIS and the comparable database for survivors of domestic violence to identify homeless households seeking further homeless services and offers supportive housing programs to these households based upon their level of service needs. Both the CoC and EOH intend to increase the amount allocated for supportive housing and Housing Problem Solving, which is the CoC's umbrella terminology for Prevention, Diversion and Rapid Exit from Homelessness services. The CoC is committed to maximize funding for CoC and ESG supportive housing through reallocation as needed. RIHousing staffs the CoC and both RIHousing and the Executive Office of Housing staff are members of the CoC Board.

The CoC continued to implement its Youth Homelessness Demonstration Program award in PY2025. This funding and the associated projects focus specifically on Ending Homelessness among unaccompanied youth within Rhode Island.

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies, and procedures for the administration of HMIS

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 RI Executive Office of Housing issues the annual CHF funding opportunity, sets parameters and overall strategy, and makes awards under the direction of the Executive Director of Homelessness and Community Supports. The Executive Director of Homelessness and Community Supports has a seat as a member of the Continuum of Care Board. As a member of the Board, he consults with the CoC in determining the allocation of ESG Funds and funding priorities and ensures that the state's homeless response priorities are aligned with CoC goals and objectives. Once the allocation of funds and funding priorities are determined, the Consolidated Homeless Fund Partnership issues the 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 Partnership then convenes a review committee consisting of representatives from the Entitlement Cities (Cities of Providence, Pawtucket, and Woonsocket), the State of Rhode Island Departments of Human Services and Rhode Island Executive Office of Housing, and members of the CoC Funding Committee, to review and consult on proposals in order to make funding decisions. This committee relies on information provided by the RICoC including point-in-time statistics, HMIS performance reports, HUD reports, and RICoC monitoring reports. The CoC also aids in the development of performance standards, provides outcome evaluations of CoC programs annually, and can coordinate with EOH on CHF outcome evaluation as requested.

State staff that administers the ESG program and ESG entitlement representatives sit on several of the CoC standing committees, including the HMIS Committee. This committee develops and annually reviews HMIS privacy plans, security plans, data quality plans and all other policies and procedures required by regulation. The Rhode Island Coalition to End Homelessness is the HMIS Lead Agency and has a memorandum of agreement with the RICoC. The determination for assistance via ESG and CoC transitional or permanent housing programs are based on HMIS data, or comparable database for survivors of domestic violence, which includes each individual's or household's housing vulnerability assessment score and priority designation.

Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

BHDDH Anticipated outcomes of ongoing consultation and improved coordination with BHDDH include the successful administration of the HUD 811 PRA Grant, achieving many goals outlined in the Strategic Plan, including ending and reducing homelessness, maintaining the protocol of not discharging a BHDDH patient into homelessness, coordinating with BHDDH on the administration of the Consolidated Homeless Fund as BHDDH passes through funding into this program, maintaining and improving BHDDH's support of and use of the Housing Focused model, and continuing to assist BHDDH in using Medicaid funds to fund housing-based supports for disabled Rhode Islanders.

RI Statewide Planning Program Anticipated outcomes of ongoing consultation and improved coordination with RI's SPP include blending the strategies and goals found in housing and economic development-related sections of the State Guide Plan with Consolidated Plans, to work with SPP in aiding cities and towns to develop and implement affordable housing policies, to better understand municipal zoning practices and how they can be addressed in order to reduce barriers to affordable and fair housing, and to share statistical information relevant to growing housing needs, such as demographic changes based on age, race and ethnicity.

RI Continuum of Care Anticipated outcomes of ongoing consultation and improved coordination with RICOC include the achievement of goals outlined in the Strategic Plan, specifically Goals 1, 2, 4 and 7. The RICOC will primarily work to achieve Goal 2, reducing, preventing, and ending homelessness through the administration of competitively awarded federal funds dedicated to this purpose.

Rhode Island Coalition to End Homeless Anticipated outcomes of ongoing consultation and improved coordination with RICEH includes the continued use of and improvement of the state's HMIS as well as continuing to advocate at the local, state, and national level for funding and policy related to ending homelessness. RICEH will also produce yearly updates on the implementation of the state's strategic plan to end homelessness, the information from which will be included in subsequent state Annual Action Plans and CAPERs.

Housing Resources Commission Anticipated outcomes of ongoing consultation and improved coordination with the HRC include the ongoing relationship in achieving access to safe and affordable housing for all Rhode Islanders, and coordination to create strong neighborhoods,

improving the economic climate of the State. The HRC was dissolved and replaced with the Advisory Council on Housing and Homelessness. The **Advisory Council on Housing and Homelessness (ACHH)** provides guidance and insight to support Rhode Island's efforts to expand housing opportunities and address homelessness across the state. Appointed by the Governor, the council brings together up to twenty members with knowledge of and demonstrated interest in housing issues affecting low- and moderate-income households and people experiencing homelessness.

Public Housing Association of Rhode Island Anticipated outcomes of ongoing consultation and improved coordination with PHARI include coordinating public housing policies that positively address state priorities, such as ending homelessness and achieving fair housing goals, while also working with PHAs to best determine ways that RIHousing can assist in the preservation and rehabilitation of the aging public housing stock in the state. RIHousing is also working with PHARI on the implementation of a coordinated waitlist for tenant-based vouchers throughout the State.

Housing Network of RI Anticipated outcomes of ongoing consultation and improved coordination with HNRI include better understanding and communicating the housing needs in the State, working with the State's network of nonprofit housing developers to increase production of the housing needs to meet these needs, and providing information at the municipal level for the purpose of engaging stakeholders from all communities.

HousingWorksRI Anticipated outcomes of ongoing consultations and improved coordination with HWRI concerning on-going research on housing production, preservation, and financing in Rhode Island in support of public and private policy and program work.

RI Department of Health Anticipated outcomes of ongoing consultation and improved coordination with HEALTH include sustaining memorandums of agreement with other state agencies in preventing homelessness and housing-related problems among the populations these departments serve, improving outreach and education on home-based lead hazards and increasing the supply of lead safe homes in the state, and to share information that is crucial in understanding housing need and how housing relates to the health and safety of Rhode Islanders.

RI DCYF Anticipated outcomes of ongoing consultation and improved coordination with DCYF include sustaining memorandums of agreement with other state agencies in preventing homelessness and housing-related problems among the populations these departments serve and to share information that is crucial in understanding housing need and how housing relates to the health and safety of Rhode Islanders, particularly young people in DCYF care transitioning into the community.

RI Department of Education Anticipated outcomes of ongoing consultation and improved coordination around the intersection of housing and education. Specifically, engaging with DoE on the McKinney-Vento Homeless Students coordinators and Early Learning Council on the importance of housing stability.

Rhode Island Builders Association Anticipated outcomes of ongoing consultation and improved coordination with RIBA includes the continued engagement of policymakers and stakeholders in policies that promote construction of safe and affordable housing (not just deed-restricted but low-cost market rate housing) and increasing the capacity of developers to produce affordable housing, particularly minority and women owned businesses.

Direct Action for Rights and Equality DARE is a Providence-based community organizer that hosts a Tenant and Homeowner Association, the primary objective of which is to protect persons from losing their homes. The anticipated outcomes of working with DARE is to include citizens most affected by state housing policies in the development of programs and to best utilize funds and policies to help those in the most need of assistance.

Rhode Island Legal Services Anticipated Outcomes of coordinating with RILS is to help inform the public on their rights as tenants and owners, to help prevent unlawful eviction, to receive foreclosure mediation, to assist tenants in eviction proceedings access emergency rental assistance, and to investigate instances of housing discrimination.

Center for Justice Anticipated outcomes of coordinating with the Center with their eviction clinic and continued education of the public on healthy housing and housing conditions and housing risks, to help inform the public on their rights as tenants and owners, to help prevent unlawful eviction, and to assist tenants in eviction proceedings access emergency rental assistance.

Executive Office of Health and Human Services Anticipated outcomes of coordinating with EOHHS include an increase in the use of Medicaid reimbursements to pay for housing stabilization and home-based health services provisions to persons in affordable and market-rate housing.

Identify any Agency Types not consulted and provide rationale for not consulting

Not Applicable

Other local/regional/state/federal planning efforts considered when preparing the Plan

TABLE II – OTHER STATE PLANS CONSIDERED IN DEVELOPING PLAN

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Opening Doors	Rhode Island Continuum of Care (RIHousing)	Goal 2, Prevent and End Homelessness, of the Strategic Plan incorporates the goals of the RI CoC

Regional Analysis of Impediments	RIHousing	All goals listed in the Strategic Plan are reflected as important to fair housing.
Housing 2030	RI Executive Office of Housing	Develop and preserve affordable housing

Three other state planning documents were considered in developing the Annual Action Plan: the Rhode Island Regional Analysis of Impediments to Fair Housing, Housing 2030, and Opening Doors. Table II describes how the goals of each plan overlap with the goals of the 2025- 2029 Strategic Plan, the component of the 2025-2029 Consolidated Plan that outlines the priority needs, goals, outcomes, and strategies described in this Annual Action Plan.

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(I))

The ESG entitlement communities of Providence and Pawtucket pool their resources with the state’s ESG funds (parties also consult with the ESG entitlement city of Woonsocket), as well as other state and federal funding, into the Consolidated Homeless Fund. The local governments of these entitlement communities endorse this coordination, which leverages state expertise for management of the programs while making sure ESG entitlement funds supports only local initiatives.

The public housing authorities in these entitlement communities, as well as the city of Newport, contribute to state CoC management, working to place members of their waitlists into housing opportunities based on the same vulnerability index used for state homelessness programs. The City of Pawtucket’s housing authority, for instance, now has a homeless priority for its project- based and tenant-based housing placement.

Units of general local government support housing, public facility, public improvement, and public service investments by applying for State CDBG funds. These funds are used to support local agencies that deliver local community development services and require UGLG’s to annually apply for this important funding.

Local leaders – mayors and city/town council members –remain important partners in the development of affordable housing in their municipalities, by supporting CDBG applications for affordable housing/housing rehab, and by speaking at the public events held to promote successful project completion. HUD CPD program entitlement communities collaborate with the state in developing regional Analysis of Impediments documents and coordinate on policies to reduce these impediments.

AP-12 Citizen Participation - 91.115, 91.300(c)

Summary of citizen participation process/Efforts made to broaden citizen participation

Efforts continue to be made to promote and encourage citizen participation in the Annual Action Plan preparation process. Documents were made available for review by the public through the RI Executive Office of Housing's and RIHousing's websites. The notice will be published at least seven (7) days before the actual hearing date in a general circulation newspaper, as well as newspapers that primarily serve minority communities. The hearing will be held at a time and place that is convenient to potential beneficiaries, and accommodated persons with disabilities and non-English speakers.

This Annual Action Plan will be issued on April 16th for a 30-day public comment period, with advertisements in the Providence Journal (English) and Noticias Rhode Island (Spanish). The draft plan will be posted at www.housing.ri.gov. The Annual Action Plan public hearing will be held in person at 5:00pm on Thursday, April 30th.

Citizen participation process impact on goal setting: The goals set in the 2025-2029 Consolidated Plan (see section AP-20 Annual Goals and Objectives, or the Strategic Plan of the ConPlan) will not change during this program year.

AP-15 Expected Resources - 91.320(c)(1,2)

Introduction

The resources listed in this Annual Action Plan are not the only resources that will help achieve the stated goals in the next year. Resources such as those associated with public housing, Performance-Based Contract Administration (PBCA) rental assistance, and private sector activity aimed at achieving the stated goals are omitted; only those resources that have a direct link to supporting the effectiveness or performance of programs funded by HUD's Community Planning and Development division are addressed in this Strategic Plan.

Program Year 2026 (Year Five of 2025-2029 Planning Period) Summary of Funding by Goal	
Goal 1 - Develop and Preserve Affordable Housing	PY26
HOME Investment Partnership Program	3,434,744.85
9% Housing Tax Credit	3,360,000
Community Development Block Grant	2,733,346
Housing Trust Fund - HERA 2008	3,000,000
4% Housing Tax Credit	1,000,000
TOTAL	11,467,391
Goal 2 - End Homelessness	
	PY26
CHF - Emergency Solutions Grants Program - Entitlement communities	708,996
CHF - Emergency Solutions Grants Program - Statewide	716,492
CHF - Social Service Block Grant, Title XX	1,208,964
CHF - HRHRR Homelessness Funding	12,500,000
Supportive Housing Program - Continuum of Care	4,244,427
HUD Section 811 Project-Based Rental Assistance (\$5.2 mill over 8 yrs)	600,000
RoadHome Service Enriched Rental Assistance Program	400,000
HOPWA	TBA
Neighborhood Opportunities Program	550,000
Thresholds	100,000
HOME-ARP	2,000,000
Recovery Housing Program	6,609,704
TOTAL	29,638,583.00
Goal 3 - Healthy Homes	
	PY26
HUD Lead Hazard Reduction Program	1,750,000
HUD Healthy Homes funding	184,875
CDBG Home Repair Program	1,093,338
TOTAL	3,303,836

Goal 4 - Non-Housing Community Development		PY26
CDBG - Balance of funds admin		1,640,0070
TOTAL		269,654
TOTALS		32,783,470

Explain how federal funds will leverage those additional resources (private, state, and local funds), including a description of how matching requirements will be satisfied

State HOME Program

According to RIHousing, the HOME program for non-entitlement communities, has financed the development or preservation of over 3,600 homes across the State since 2005, leveraging critical other public and private housing finance resources.

HOME applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. Sources contributing to the development of HOME-assisted projects include: market rate bank financing, private foundation grants, private donations, Lead Hazard Reduction funds allocated from the state, State Housing Production Funds, State Low Income Housing Tax Credit Funds, Community Development Block Grant funds and Affordable Housing Program funds (Federal Home Loan Bank of Boston).

ESG Match

To comply with ESG requirements applicants must match Consolidated Homeless Funds (CHF) funds from non-federal HEARTH ACT sources of funds. Applicants are required to include all funds to be used as match in their program budgets. If approved for funding, applicants must submit documentation substantiating the availability and amount of matching funds. Matching funds must also be for the same time period as the funding period and must meet CHF Program eligibility requirements. Any applicant that is unable to meet match requirements may request a partial waiver and must detail their justification for not being able to meet this requirement.

In PY24, the state’s ESG formula allocation will only make up 9.97% of the funding for the Consolidated Homeless Fund, with 9.74% coming from other CPD funds (ESG entitlements combined), another 17.7% coming from non-CPD federal funds (Social Services Block Grant), and the rest (62.59%) coming from the state’s Homelessness funding (HRC).

CDBG Match

The State provides its required CDBG match through the salary and fringe benefits for multiple employees. The allowed administration amount for PY26 is \$272,165 (3% of the State's allocation

plus \$100,000) with \$172,165 needing to be matched dollar for dollar. The salary and fringe benefits for one of these employees is paid entirely with State dollars totaling approx. \$159,508. The remaining funds requiring one-to-one match, if any, will be matched on a dollar-for-dollar basis by federally unreimbursed time spent by (R.I Executive Office of Housing staff working on the projects and initiatives of the CDBG program.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not applicable

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)
Goals Summary Information

TABLE 50 of the Strategic Plan introduces the five goals of the 2025-2029 Consolidated Plan. Tables 89 A and 89 B summarize the funds available by goal and the proposed outcomes as related in the aforementioned tables from the Strategic Plan. TABLE 89 A covers the programs directly administered by EOH and TABLE 89 B covers the programs administered by RIHousing. Program Year 2024 funding for Goals 1 through 4 include an estimated \$35 million in funding from all sources.

Other HUD funds to support Rhode Island’s housing and homelessness goals in Program Year 2026 include competitively-awarded sources from the HUD Office of Special Needs Assistance Programs (SNAPS) – through the Continuum of Care programs. Additional funding will come from the Office of Lead Hazard Control and Healthy Homes (OLHCHH) – through HUD Lead Hazard and Healthy Homes funding and the Office of Public and Indian Housing (PIH) – through the Housing Choice Voucher Program. US Treasury programs include the Low-Income Housing Tax Credit Program. Other federal, state and private financing supports these initiatives to achieve the proposed outcomes.

Section AP-55 describes in detail the number of families to be provided affordable housing, estimated to total 731. We estimate that 67% of these families or households (490) will be extremely low-income, 25% will be very low-income (183) and 8% will be moderate-income (58). These percentages are based on current program income-based performance metrics.

Program Year 2026 (Year Two of 2025-2-29 Planning Period) Summary of Outcomes by Goal		
Goal 1 – Develop and Preserve Affordable Housing	Outcome	PY26
HOME Investment Partnership Program	Rental Units Constructed or Rehabilitated	30
Community Development Block Grant	Homeowner Housing Added	10
Housing Trust Fund – HERA 2008	Rental Units Constructed or	20

	Rehabilitated	
Goal 2 – End Homelessness		
CHF – Emergency Solutions Grant Program – Statewide	Outcome	PY26
	Shelter – Persons	3,000
Goal 3 – Healthy Homes		
CDBG Home Repair Program	Outcome	PY26
	HO Housing Rehabilitated	75
Goal 4 – Non-Housing Community Development		
CDBG – Balance of funds	Outcome	PY26
	Public Facility/Improvement – Persons	15,000
Goal 5 – Planning & Administration		
CDBG – Planning & Admin	Outcome	PY26
	Plans Administered	1

AP-25 Allocation Priorities – 91.320(d)

Introduction:

Most funding programs address one goal directly. Only HOME and CDBG programs are split between funding the outcomes of more than one goal. However, many funding programs indirectly assist with the achievement of other goals; for instance, the HTF, HOME and LIHTC programs, though they specifically fund affordable housing development, also contribute to the reduction of homelessness (Goal 2), the provision of safe and healthy housing (Goal 3) and non-housing community development (Goal 4). Providing healthy homes goes to reducing the likelihood of homelessness and improving the communities in which these programs serve, thus addressing Goals 2 and 4 while achieving their stated outcomes.

Funding Allocation Priorities

TABLE V – FUNDING ALLOCATION PRIORITIES

Program Goal	Goal 1 - Affordable Housing Development (%)	Goal 2 - Homelessness (%)	Goal 3 - Safe and Healthy Housing (%)	Goal 4 - Non-Housing Community Development (%)	Total (%)
CDBG	25	0	0	75	100
HOME	85	15	0	0	100
ESG - State	0	100	0	0	100
HERA - Housing Trust Fund	100	0	0	0	100
Continuum of Care	0	100	0	0	100
LIHTC	100	0	0	0	100
HOPWA	0	100	0	0	100
Federal - Lead	0	0	100	0	100
Federal - Healthy Homes	0	0	100	0	100
BHRI	100	0	0	0	100
Consolidated Homeless Fund	0	100	0	0	100
RoadHome	0	100	0	0	100
Thresholds Program	0	100	0	0	100
NOP	0	100	0	0	100

Reason for Allocation Priorities

Rhode Island’s need for affordable housing development, and the lack of other sources for capital assistance, has led to the HOME and HTF programs’ focus on Goal 1. The state CDBG program funds the most diverse set of priorities of any state program; bolstering efforts to develop affordable housing while previously reliable capital sources have dried up, funding the Home Repair program to provide resources to low-income households throughout the state that do not qualify for other funding, and funding crucial public facility, public service and public infrastructure needs to non-

entitlement communities. The State's allocation of CDBG Recovery Housing supplemental funds allocated under the SUPPORT Act is limited to addressing the housing needs of persons in recovery from substance abuse disorders. The funding of programs to prevent and end homelessness through ESG, state and entitlement, and HOPWA, thus each's 100% focus on Goal 2, relates to the state's Strategic Plan to End Homelessness, known as Opening Doors Rhode Island.

How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?

All of the funds associated with Goal 1, as described in AP-15, will combine to meet the objectives of developing or preserving close to 1,200 affordable homes. Based on analysis of previous years' funding of affordable development, the \$25.5 million in capital subsidies will leverage an additional \$130 million in other private funding. All Goal 1 funds, which now includes the state's Housing Trust Fund allocation, will directly address priority needs 1, 2 and 8 as described in TABLE 45, section SP-25 of the Consolidated Plan 2025-2029 Strategic Plan.

The Consolidated Homeless Fund combines five different program sources associated with Goal 2, as described in TABLE 89, to fund rapid re-housing, state rental assistance, permanent supportive housing vouchers and emergency shelter operations, street outreach and RI Homelessness Systems Development Work. RoadHome and State Rental Assistance programs, such as the Housing Production Fund- ELI program, go to fund the state's permanent supportive housing opportunities, although they function as separate programs. HOPWA funds housing assistance for homeless persons with AIDS while NOP funds the operations of rental units that offer reduced rents and supportive services for households that qualify as homeless. All of these programs combine to prevent and end homelessness, which is Goal 2 of the 2020-2024 Consolidated Plan, and shares the goals outlined in Opening Doors Rhode Island, the state's plan to end homelessness. Priority needs 3, 8 and 10 (TABLE 50 of the Consolidated Plan 2020- 2024) are directly addressed by the distribution of these funds. These funds are distributed to qualified service providers located in Rhode Island that offer eligible programming for homeless persons and households.

The LeadSafe Homes Program (LSHP) of RIHousing combines funding from HUD and from the state to remediate lead-paint and other healthy homes hazards, including environmental home hazards like radon and carbon monoxide exposure, asthma triggers, mold and moisture problems, poor indoor air quality, slip and fall hazards, pests, and fire hazards., providing these services to nearly 75 homes annually (combining both homeowners and rental housing and HUD and State funding). RIHousing's LSHP staff takes in applications, completes the inspection and analysis of need of a home, schedules a contractor walkthrough advertised to RIHousing-enrolled state-licensed lead hazard work contractors, coordinates scope of work review and work plan between lowest bidder and owner, relocates tenants temporarily if needed, clears the final work with owner and contractor, then pays the contractor directly based on invoices once the work is cleared.

The CDBG Home Repair Program provides funding to units of general local government (UGLGs), sometimes individual municipalities or groups of municipalities, to operate funding programs to homeowners in need of rehabilitation assistance. Priority needs 1,4, 5 and 10 (TABLE 50 of the

Consolidated Plan 2020-2024) are directly addressed by the distribution of funds to LSHP and municipal home repair programs (CDBG). CDBG funds for non-housing community development are distributed to UGLGs to use to develop much-needed public facilities and infrastructure. CDBG Recovery Housing will be distributed in accordance with guidance provided by HUD. Priority needs 6 and 7 (TABLE 50 of the Consolidated Plan 2020-2024) are directly addressed by the distribution of these funds.

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AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

State programs that meet the goals outlined in the Strategic Plan and include some HUD assistance are described in this section. The Housing Choice Voucher Program does not make funds available through competitive rounds but provides housing assistance payments to landlords on behalf of qualified tenants. When a tenant leaves the program, a new tenant is re-certified from the waiting list then provided a voucher with which to find an eligible housing unit in the private rental market. The state's HOPWA competitive grant program provides renewal funding to its two sponsors, AIDS Care Ocean State and the Community Care Alliance and does not solicit requests for proposals. The following programs solicit funding proposals through competitive rounds save for the LeadSafe Homes Program and allocation of 4% Housing Tax Credits, which accept applications on a rolling basis.

Distribution Methods

Low Income Housing Tax Credits

Selection criteria and relative importance:

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). Eligibility requirements for any type of tax credit are based on complex federal regulations, and the state advises all developers to consult qualified tax attorneys or accountants to determine eligibility for the credit.

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 tax exempt financing with 4% credits are received on a rolling basis. While 4% credit proposals are not required to participate in a competitive funding process, all development proposals must meet the requirements of the QAP.

RIHousing is not required to allocate all tax credits even if it has received a surplus of applications that have exceeded the threshold criteria. After a project has met its threshold requirements (which are described later in the section), it is then scored using the QAP's scoring criteria, which emphasizes financial leveraging, as well as projects effectively serving the lowest income households and showing a strong readiness to proceed in addition to a variety of other scoring opportunities for aligning with other state goals. These other opportunities may include providing good homes in healthy environments, providing supportive services, encouraging energy efficiency, expanding accessibility, and otherwise expecting to have a strong community impact.

RIHousing staff conducts an initial review to determine if a project meets threshold requirements and subsequently scores these projects. Staff then presents results of reviews to its funding committee composed of senior staff and representatives from its Board of Commissioners for formal scoring and allocation determinations. Aggregate assessments and scores in no way guarantees an award of tax credits to a particular development.

NOTE: The full Rhode Island Qualified Allocation Plan for 2026 funding rounds is available at <https://www.rihousing.com/wp-content/uploads/2026-Section-7-QAP.pdf>

Resource allocation by funding category

In accordance with federal tax code, RIHousing will set aside a minimum of ten percent of the total tax credit allocation available for qualified non-profit organizations that materially participate in the development and management of the project throughout the compliance period.

Threshold factors and grant size limits

Threshold criteria that must be met before a development can be considered for a reservation of housing credits include: The development team must have experience in the successful development and operation of affordable housing of similar scope and complexity; the development must demonstrate financial feasibility for at least 15 years and have a reasonable likelihood of feasibility for the entire term of financing; the development must have a reasonable likelihood of achieving sustainable occupancy of 95% within six months of construction completion; and construction must be reasonably likely to commence within twelve months of preliminary commitment and be complete within 30 months of firm commitment.

What are the outcome measures expected as a result of the method of distribution?

Rental units constructed 321, rental units rehabilitated 600

HOME Program

The state's HOME program awards funding for the purpose of acquisition, rehabilitation and new construction of affordable housing. RIHousing intends to continue with 10%, or \$343,474 as the cap on administration.

Selection criteria and relative importance:

Rhode Island priorities include three Tiers found below.

- 1) Tier 1 / High Priorities:
 - a) Substantial rehabilitation and/or new construction to provide new rental units for low and very low-income families;
 - b) Substantial rehabilitation and/or new construction of new housing units for homeless and special needs populations (as defined in the Consolidated Plan), in conjunction with supportive services.
- 2) Tier 2 / Medium Priorities:
 - a) New construction to provide new rental units for low and very-low income one and two-person households;

- b) Preservation of the existing affordable housing stock through rehabilitation. (Properties eligible for assistance under 24 CFR 248 “Prepayment of Low-Income Housing Mortgages” are ineligible for HOME funds)

3) Tier 3 / Low Priorities:

- a) Moderate rehabilitation of rental units for low and very low-income households throughout the State including the elimination of lead-based paint hazards, correction of code violations, the provision of handicapped access for persons with disabilities and for the elderly, and to increase the energy efficiency of units occupied by lower income families;
- b) Acquisition only for the purposes of any of the above-mentioned activities.

Resource allocation by funding category

Of the total grant award for PY26, 10% will go to project administration and a maximum of 5% will be held to support Community Housing Development Organizations (CHDO) operating expenses. 25% will go to rental housing production or rehabilitation.

Funding will be allocated in a competitive application process open to all eligible entities, including cities and towns, nonprofit housing organizations, and for-profit developers. It is available to all communities in the State, with the general exception of Providence, Pawtucket, and Woonsocket, which receive HOME allocations directly from HUD. Rhode Island Housing staff review project applications to ensure their compliance with all federal and state regulations and to assess overall project feasibility. Applications are scored based upon the criteria shown later in this section. Rhode Island Housing staff reviews each proposal and recommends funding of specific activities to the Board of Commissioners. Contracts are then awarded by Rhode Island Housing to HOME sponsors. Since funds are awarded on the basis of competitive applications, it is not yet possible to identify which specific groups will be assisted during the upcoming 2026 program year.

In line with federal regulations (24 CFR 92.300), at least 15% of the total HOME allocation is set aside for investment in housing developed, sponsored, or owned by eligible Community Housing Development Organizations (CHDO). These organizations will receive preference in the application process.

Funding Categories:

- HOME-assisted rental units must have rents that do not exceed the applicable HOME rent limits. Each year, HUD publishes the applicable HOME rent limits by area, adjusted for bedroom size. For projects with five or more HOME-assisted rental units, 20 percent (20%) of the units must be rented to very

low-income families.

- HOME-assisted rental housing must remain affordable for a long-term affordability period, determined by the amount of per-unit HOME assistance or the nature of the activity. An additional extended use restriction may also be added, at the discretion of the PJ. HOME-assisted homebuyer housing is also subject to Rhode Island Housing Resale and Recapture Policies.

Threshold factors and grant size limits

For an application to be moved forward through the scoring process it must meet and/or exceed the following requirements:

- A complete application including all attachments submitted on or before the application deadline;
- Application contains a description of eligible activities to be conducted with HOME funds and applicant is an eligible entity meeting all HUD regulations for the HOME program as published in the Federal Register at 24 CFR Part 92.205;
- Proposed assistance amounts to a minimum of \$1,000 per unit
- Project must meet at least one program priority, as described in the section titled “Rhode Island Program Priorities”
- Project is consistent with the HOME income targeting rule at §92.216-217);
- The development team must have experience in the successful development and operation of affordable housing of similar scope and complexity;
- The development must demonstrate financial feasibility for the duration of the affordability period and have a reasonable likelihood of feasibility for the entire term of financing;
- The development must have a demonstrated probability of achieving sustainable occupancy of 95% within six months of construction completion and 100% occupancy within eighteen months of project completion;
- Construction must demonstrate a probability that it will commence within six months of firm reservation of funding and be completed within twenty-four months of commitment/closing

The HOME Final Rule, at [24 CFR 92.250\(a\)](#), requires HUD to determine the total amount of HOME funds that a participating jurisdiction may invest on a per-unit basis in affordable housing in accordance with Cranston-Gonzalez National Affordable Housing Act (“NAHA”) and publish the maximum per-unit dollar limits for the area in which the housing is located annually. Maximum HOME investment: On April 10, 2026 HUD published a Notice for Comment related to HOME Investment Partnerships Program-Maximum Per-Unit Subsidy Limit Methodology and Amount. In this Notice HUD established the maximum per-unit subsidy limit for the HOME program as 240 percent of the basic mortgage limitations for section 234 of the National Housing Act's condominium housing limit for elevator-type projects. Public comments are due on May 11, 2026. The maximum per-unit subsidy limits described in the Notice are in effect and applicable to projects for which HOME funds are committed on or after May 11, 2026. HUD intends to issue updated maximum per-unit subsidy limits using this methodology annually. HUD may revise this methodology through the issuance of a future publication for comment in the Federal Register.

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What are the outcome measures expected as a result of the method of distribution?

Estimated goal outcome indicators include: HOME- assisted rental units constructed 22, rental units rehabilitated 11.

Performance measures information: In accordance with the Notice of Outcome Performance Measurement System for Community Planning and Development Formula Grant Programs dated March 7, 2006, Rhode Island Housing evaluates HOME Program investment using the IDIS Outcome Performance Measurement System.

The HOME Program objective is Providing Decent Affordable Housing through acquisition, rehabilitation and new construction of rental units and homeownership opportunities. The HOME Program outcome is Affordability.

Housing Trust Fund Program

The National Housing Trust Fund (HTF) is a federal program to support the development of affordable housing for low-income individuals and households. It complements existing federal, state, and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for families and other households in Rhode Island, including homeless families.

The HTF will be funded annually with certain proceeds available from two government-sponsored entities – the Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Mortgage Corporation (Freddie Mac). The U.S. Department of Housing and Urban Development (HUD) will administer the HTF at the federal level and will distribute trust funds to participating states in accordance with an established formula.

Each participating state must identify one qualified housing agency to allocate the funds made available through HTF. In addition, each state must prepare and submit for HUD approval an allocation plan outlining the process it intends to follow to distribute the HTF monies. The National Housing Trust Fund Interim Rule can be found at 24 CFR Parts 91 and 93.

In the State of Rhode Island, the Governor has identified RIHousing Mortgage and Finance Corporation (RIHousing) as the allocating agency for the HTF. Rhode Island does not intend to appoint subgrantees for HTF and will distribute funds directly to recipients, defined as “organizations, agencies, or other entities that receive HTF funds to undertake an eligible project.” It is RIHousing’s intent to award HTF funds as rapidly and efficiently as possible.

In any fiscal year in which the total amount available for allocation of HTF funds is less than \$1 billion, RIHousing must use one hundred percent (100%) of its HTF grant for the benefit of extremely low-income families or families with incomes at or below the poverty line (whichever is greater). In any fiscal year in which the total amount available for allocation of HTF funds is greater than \$1 billion, the grantee must use at least seventy-five percent (75%) of its grant for the benefit of extremely low-income families or families with incomes at or below the poverty line.

Selection criteria and relative importance:

Scoring of applications is based on the following factors:

Rhode Island Program Priorities

Rhode Island priorities include three Tiers found below.

- 1) Tier 1: Acquisition and/or substantial rehabilitation and/or new construction to provide rental units for extremely low-income (ELI) families;
Acquisition and/or rehabilitation and/or new construction of rental housing units for homeless and special needs populations in conjunction with supportive services;
Acquisition and/or rehabilitation and/or new construction of rental housing units that provides or will provide project-based rental assistance to eligible tenants.
- 2) Tier 2: Preservation of existing affordable rental housing stock through rehabilitation, acquisition, or other eligible assistance;
Acquisition and/or rehabilitation and/or new construction to provide rental units for one and two-person households;
Acquisition, and/or rehabilitation and/or new construction to provide rental units for elderly residents
- 3) Tier 3: Moderate rehabilitation of rental units for families throughout the State including the elimination of lead-based paint hazards, correction of code violations, the provision of handicapped access for persons with disabilities and for the elderly, and to increase the energy efficiency of family units;
Acquisition and/or substantial rehabilitation and/or new construction to provide rental units for very low-income (VLI) families, as permitted by the regulations

Geographic Diversity

As described in the scoring factor matrix for the HTF, HTF funding is available to all communities in the state. However, priority will be given to communities who have yet to meet or exceed the state's Low- and Moderate-Income Housing Act requirements. Geographically based distribution criteria for HTF funds also include factors that contribute to improving or sustaining economic opportunity for the future tenants or owners of the homes developed. These criteria include additional points for accessibility to transit, accessibility to employment centers, accessibility to high performing schools and accessibility to community services.

Applicant Capacity

A threshold for an application to move to scoring requires that the development team must have experience in the successful development and operation of affordable housing of similar scope and complexity. Scoring of an application includes higher points for proven capacity (i.e., strong project performance in past, experienced development and management teams associated with proposed project, financial soundness) and deductions of points for poor prior performance (i.e., monitoring findings among comparable projects, lack of responsiveness, compliance concerns, etc.).

Project-based Rental Assistance

Providing project-based rental assistance to eligible tenants is a high and Tier 1 priority for the HTF program (see program priorities). Applicants with existing or committed project-based rental assistance will receive preference.

Duration of Affordability Period

All HTF applicants must propose a minimum of a 30-year affordability period beginning after project completion per § 93.302(d). Operating pro forma reviewed by program underwriters is reasonably projected to meet or exceed minimum affordability period. Financial feasibility of the project and length of affordability are scoring factors.

Priority Housing Needs in the State

Rhode Island's HTF program bases awards on the merits of a project's application in meeting the priority housing needs established by the State. Priority housing needs refers to both the program's development priorities and the statewide housing needs as determined in the State's most recently approved five-year Consolidated Plan. The program priorities are listed above, with descriptions provided for Tier 1, Tier 2, and Tier 3 housing development priorities. The priority needs established in the most recent ConPlan include: increased housing opportunities for low- and moderate-income households; preserved affordability of current affordable housing stock; end homelessness; permanent supportive housing; Adapt aged housing to fit residents' needs; elimination of lead-hazards; investments and improvements in public infrastructure, public services and public facilities; and removed barriers to fair and affordable housing. Further, it is a priority of the state's HTF-administering agent, RIHousing, that housing is developed where there is proven demand (as shown in a market study or a relevant waitlist) for that housing type.

Leveraging

Rhode Island's HTF Program utilizes ratios of committed funds to non-committed, federal versus non-federal match, and HTF funds versus other sources to determine scoring. Committed funds receive more weight than non-committed sources. Similarly, non-federal match will be given more weight than federal funds leveraged into a project.

Resource allocation by funding category

In accordance with HUD guidance, the funds available through HTF can only be used to directly support housing units for the target income group (ELI individuals or households). HTF units can be included in projects that also serve higher income level tenants, but the HTF monies can only support the HTF-designated units. All HTF-assisted rental housing must meet a 30-year affordability period. Per § 93.200, HTF funds may be used for the production or preservation of affordable housing through the acquisition, new construction, reconstruction and/or rehabilitation of non-

luxury rental housing with suitable amenities. All HTF applications must include a description of the eligible activities to be conducted with HTF funds. Funds may be used to support:

- Real property acquisition
- Site improvements and development hard costs
- Conversion
- Related soft costs
- Demolition
- Financing costs
- Relocation assistance
- Reasonable administrative and planning costs

Threshold factors and grant size limits

Eligibility Requirements

- a) Funding will be allocated in a competitive application process open to all eligible entities, including cities and towns, nonprofit housing organizations, and for-profit developers. It is available to all communities in the State, with priority given based on specific factors listed in the Selection Criteria section below. Cities and towns are encouraged to apply to receive funding for projects. To be considered eligible for program funds, Rhode Island requires that recipients of HTF funds per §93.2, at minimum: Make acceptable assurances to the grantee (RIHousing) that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds and ending upon the conclusion of all HTF-funded activities.
- b) Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity
- c) Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs
- d) Have demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development.

RI Housing will generally award HTF as subordinate debt and will close all HTF assistance through its approved closing policies and procedures. Application Requirements

RIHousing will conduct up to four (4) competitive rounds per program year – one as part of the Low-Income Housing Tax Credit application process and up to three additional rounds as part of a joint application with other ancillary funding programs (such as HOME, BHRI, Thresholds, etc.). Additional rounds may be held if there are remaining project funds not yet committed. Incomplete applications will not be considered for funding. Applicants not funded in one round are encouraged to re-apply in subsequent rounds.

RIHousing staff will review project applications to ensure their compliance with all federal and state regulations and to assess overall project feasibility and if they meet threshold criteria as outlined below.

Upon review and scoring of those applications meeting the Minimum Requirement Threshold, found below in a subsection of “Selection Criteria”, RIHousing staff will recommend funding of specific activities to its Board of Commissioners. Upon preliminary reservation by the Board of Commissioners, RIHousing staff will complete underwriting and cost reasonableness analysis and resubmit the project to the Board of Commissioners for final reservation. HTF Commitments will then be formally awarded by RIHousing to HTF recipients in the form of an executed HTF Agreement (“Commitment”). Both the application and the HTF Agreement will require recipients to affirmatively certify that housing assisted with HTF funds will comply with all HTF requirements.

Selection Criteria

Minimum Requirement Threshold

Before an application can be considered for a reservation of funds it must meet or exceed the following:

- A complete application including all attachments submitted on or before the application deadline;
- Application contains a description of eligible activities to be conducted with HTF funds and applicant is an eligible entity meeting all HUD regulations for the HTF program as published in the Federal Register at 24 CFR Part 93.200-93.204;
- Proposed assistance amounts to a minimum of \$1,000 per unit
- Project must meet at least one program priority, as described in the section titled “Rhode Island Program Priorities”
- Project is consistent with the HTF income targeting rule at §93.250.
- The development team must have experience in the successful development and operation of affordable housing of similar scope and complexity;
- The development must demonstrate financial feasibility for the duration of the affordability period and have a reasonable likelihood of feasibility for the entire term of financing;
- The development must have a demonstrated probability of achieving sustainable occupancy of 95% within six months of construction completion and 100% occupancy within eighteen months of project completion;
- Construction must demonstrate a probability that it will commence within six months of firm reservation of funding and be completed within twenty-four months of commitment/closing

Maximum per-unit development subsidy amounts for HTF projects

Pursuant to 24 CFR 93.300(a), RIHousing must establish maximum limitations on the total amount of HTF funds that the grantee may invest per-unit for development of non-luxury housing. To maintain maximum consistency across programs, and to provide predictability and efficiency in program administration and compliance, the State has adopted the HOME program maximum per- unit development subsidy limits for the Housing Trust Fund program.

The Housing Trust Fund Program will use the same standards as published for the HOME Program for Program Year 2026.

What are the outcome measures expected as a result of the method of distribution?

- It is expected that the HTF will contribute to the development or preservation of 30 units of housing per year. This estimate is based on analysis of previous funding rounds and anticipated demand for the program. If less units of housing are assisted with HTF funds than this expectation, then allocation priorities will be reconsidered in future program years.
- In accordance with the Notice of Outcome Performance Measurement System for Community Planning and Development Formula Grant Programs dated March 7, 2006, RIHousing will evaluate the HTF Program using the IDIS Outcome Performance Measurement System.
- The HTF Program objective is Providing Decent Affordable Housing through acquisition, rehabilitation, and new construction of rental units. The HTF Program outcome is Affordability.

CDBG Program

The Rhode Island Executive Office of Housing administers the State's Community Development Block Grant ("CDBG") Program for those communities that do not receive allocations directly from the U.S. Department of Housing and Urban Development. The State's goal is to maximize the impact of CDBG funding by prioritizing activity types and communities of greatest need.

A minimum of thirty percent of the State's PY2026 CDBG allocation will be distributed on an annual competitive basis for the following priority activity types eligible under the Rhode Island Executive Office of Housing: Public facilities, Infrastructure and Public Services. Activities will be funded, in whole or in part, based upon State Priorities, taking into account limited funding available, geographic distribution of resources and staff/threshold comments. Future year funding may be committed contingent upon receipt and availability of funds. Priority populations and activities as detailed in the State's Non-Housing Community Development needs assessment may receive extra consideration. Communities are reminded that the CDBG application is highly competitive. The State intends to fund the most impactful activities in the communities of greatest need, however, not all applicants are guaranteed an award.

A rolling application process will be utilized to obligate funds to the following high priority activity categories: Housing Rehabilitation, Economic Development, and Affordable Housing. Applications may be submitted on the most current application forms available, in accordance with the Rhode Island Department of Housing PY26 CDBG Schedule following the most current procedures. Such applications will be reviewed for eligibility. Only those applications which can demonstrate the activity meets program requirements, and can immediately proceed, with necessary funding substantially obligated, may be considered. The Rhode Island Executive Office of Housing staff may consult with other state agencies during the review. Temporary/transitional housing (including emergency shelters for the homeless and group homes which constitute "public facilities" under CDBG regulations) may apply under the "Affordable Housing" set aside or through the annual competitive process referenced above.

Any funds remaining from PY18 or earlier were de-obligated effective June 30, 2025 (excluding contracts with termination dates after June 30, 2025). Any program income returned, or any additional funds recaptured, de-obligated, reallocated or otherwise available shall be available in accordance with the PY26 distribution process. New awards may be funded with PY26 funds and/or prior source year CDBG funds, at the sole discretion of the Rhode Island Executive Office of Housing Awards may be shifted to different source year funds, prior to processing of the initial draw request for an activity, to expedite closure of older grant years. Over the course of each year, in consideration of a project's timeline, future year funding may be tentatively committed to specific activities proposed, subject to availability. These amounts will be deducted from the total available in that year's application cycle.

Selection criteria and relative importance:

All Rhode Island municipalities, except those receiving direct CDBG entitlements from HUD, are eligible to apply via competitive and rolling application processes. Threshold criteria for rolling applications are described in the thresholds section below. The following process/criteria apply to the competitive application only.

Rhode Island Executive Office of Housing, Staff Review/Fundability. All applications received will be

reviewed by The Rhode Island Executive Office of Housing staff for compliance with Federal and State program rules and regulations. Any activity deemed not compliant with such requirements will be eliminated from consideration. Area under consideration in this part include:

Completeness of application; Fundability - meets Eligibility and National Objective requirements; Process Issues - meets necessary regulatory public comment processes; Consistency with Program Design. Scoring: Applications will be scored based upon the following: Total number and/or concentrations of low/moderate income persons served by the proposed activity; Cost per LMI person served by the proposed activity; Priority activities: (Public Improvements/Facilities – water/sewer and street/streetscapes activities are considered the highest priorities; Public Services – job training and essential services for the homeless and elderly are prioritized); Activities in communities making substantial progress in their Housing 2030 Goals may receive priority consideration. Committee Evaluation: Committees comprised of individuals with expertise in community development issues will use the scoring results described above as a guide in consideration of proposals received. The committees may reduce and/or eliminate a request based upon the following criteria: (Timeliness – Any activity not likely to proceed in a timely fashion shall be eliminated from consideration. Timeliness requirements vary depending on activity type, as outlined in application materials; Other Sources/Reviews – Any activity with an available, alternative source of funds may be eliminated from consideration. Such alternatives may or may not be under State control. Activities may also be eliminated from consideration if the proposal has not progressed through necessary/appropriate review steps by other State/local authorities; Capacity/Performance – Any activity that lacks the experience and/or capacity to implement the proposed activity shall be eliminated from consideration. Demonstrated past performance and resolution of prior monitoring/audit findings will be taken into consideration. Outstanding issues will be considered; Feasibility/Accuracy – Any activity that is not feasible as described in the application, may be eliminated from consideration. Cost effectiveness of the proposal will be reviewed under this criterion. If the information provided in the application is inaccurate, it may also be eliminated; The committees may factor geographic distribution to assure areas are served equitably).

Access to application manuals

Application materials, including details on the application criteria and the PY25 CDBG Schedule, will be publicly available on the CDBG webpage at: <http://housing.ri.gov>

A community application workshop will be conducted at the beginning of the competitive application process.

Resource allocation by funding category

All applications will be reviewed by The Rhode Island Executive Office of Housing staff for compliance with Federal and State program rules and regulations, and threshold requirements. Any activity deemed not in compliance with such requirements will be eliminated from consideration. The Rhode Island Executive Office of Housing staff may consult with other state agencies during the threshold review. As described above, the State will use rolling and competitive application processes to distribute PY26 funds.

The CDBG funds are split among multiple Funding Allocation Priorities, with estimates shown below and in Table V. Goal 1 (Affordable Housing Development) – 50% of the State’s CDBG allocation – Applications must create or preserve long-term affordable units at any residential facility that

provides transitional or permanent housing and serves low/moderate income households. Capital improvements at homelessness shelters are eligible for assistance under this category, as transitional housing. Activities must meet the LMI Housing national objective (or LMI Limited Clientele in the instance of shelters or group homes); Goal 3 (Safe and Healthy Housing) – 20% of the State’s CDBG allocation - Housing rehabilitation: Rehabilitation of single family (one-four units) housing. Only applications meeting the Low/Moderate Income Housing national objective will be considered; and Goal 6 (Non-Housing Community Development) – 30% of the State’s CDBG allocation - Includes Economic Development, Public Facilities/Infrastructure, and Public Services.

The State will determine local administration awards, ranging from 5% to 15% based upon the activities funded, their size and their complexity. For example, a construction project which requires extensive environmental review and federal labor standards compliance may receive an additional 15% to support administrative costs, while a small public service proposal may receive little administrative funds. All administrative expenses must be supported by time sheets/billing and other verifiable documentation.

Threshold factors and grant size limits

For the competitive round, limits on the number of activities and amounts which may be requested will be identified in the application handbook. For clarity, additional details relative to each activity type have been separated.

Residential Rehabilitation Thresholds (Up to 25%): National Objective (income & family size backup documentation); Inspection/scope/cost documentation; Procurement documentation (bid, quotes); Environmental documentation; Ownership and other applicant data.

Limit: The State will reserve up to 20% (\$1,093,338) of its annual award, minus State administration, for residential rehabilitation purposes. Any funds not obligated by the conclusion of the annual competitive application cycle described below will be de-obligated for these purposes and distributed at that time. Up to 20% may be used for documented housing operating and administrative costs. Individual projects may not exceed \$50,000-\$75,000 depending upon the number of units in the structure rehabilitated, consistent with similar Statewide home repair programs. No individual community may submit requests for more than 20% of the total housing rehab amount reserved, unless they are serving as a lead community for multiple individual communities. The State has selected an entity for administration of a state-funded Statewide home repair program. This vendor can be used by municipalities who struggle with capacity to administration a residential rehabilitation program.

Affordable Housing Thresholds (No category limit specified - Projected 50%): National Objective & Eligibility Compliance; Financial Feasibility (Construction and/or Operating); Cost necessary & reasonable; Long-term affordability; Developer risk; Staff and Committee criteria detailed in the annual competitive process below. Limit: Ongoing - The State will fund applications on a first-come, first-served basis, up to a maximum allowed when factoring other set-asides. Therefore, it is projected that 50% (\$2,733,346) of the State’s allocation would be available for this purpose. No individual application may receive more than \$250,000/unit.

Economic Development Thresholds (No category limit specified): National Objective & Eligibility Compliance; Public Benefit requirements; Financial/Project Feasibility; Cost necessary & reasonable; and Underwriting.

Limit: Ongoing - The State will fund applications on a first-come, first-served basis, up to a maximum allowed when factoring other set-asides. The State does not project significant obligations under this category.

Individual proposals must meet the aggregate public benefit requirements for the program.

Public Facilities/Public Improvements & Public Service Thresholds (Minimum of 30%): The Rhode Island Executive Office of Housing Staff Review/Fundability. All applications received will be reviewed by The Rhode Island Executive Office of Housing staff for compliance with Federal and State program rules and regulations. Any activity deemed not compliant with such requirements will be eliminated from consideration. Limit: The State will reserve 30% (\$1,640,007) to support public facility/improvement and public service proposals. Of that, a minimum of 10% (164,000) will be used to support public service proposals. Applications will be accepted annually using the competitive application cycle described above.

Expected outcome measures:

Rental units rehabilitated (Goal 1) - 14, homeowner housing rehabilitated (Goal 3) – 50, public facility and infrastructure improvements other than low-mod housing benefit (Goal 6) - 15,000 persons, public services other than low-mod housing benefit (Goal 6) - 750 persons

CDBG-Recovery Housing

HUD has allocated supplemental funds available under the SUPPORT Act for increased transitional housing for persons in recovery with substance abuse disorders. These funds are limited to “housing” activities, such as rental assistance and/or acquisition/rehabilitation of units for persons in recovery with substance abuse disorders. The Needs Assessment in the 2025-2029 finds that a significant portion of both sheltered and unsheltered homeless persons are suffering from chronic substance abuse.

Selection criteria and relative importance:

The Rhode Island Executive Office of Housing staff is responsible for verifying that each proposed project/program fulfills at least one CDBG national objective, and meets threshold, eligibility, and cross-cutting requirements, and that CDBG Recovery Housing funds are the best available resource for implementation of the proposal.

Proposals that meet these criteria shall then be evaluated in accordance with the *CDBG PY25 Application Handbook*.

Factors that shall be considered in evaluating CDBG-Recovery Housing proposals include, but are not limited to, the following: (1) Cost per person served; (2) Fulfillment of low- and moderate-income National Objective; (3) Applicant capacity, including experience with persons in recovery from substance abuse; (4) Ability to leverage other funding sources and/or wrap-around services for resident clients.

Resource allocation by funding category:

Rhode Island has been allocated a total of \$6,609,704 in Recovery Housing funds through 2025, with

an additional \$999,382 in 2026. The allowable amount, estimated at a total of \$380,454, will be set aside for administrative purposes. The State will work with its Department of Behavioral Healthcare, Development Disabilities & Hospitals (BHDDH) for support of news beds for substance use recovery. The balance of funds available may be awarded to eligible entities in accordance with applicable HUD guidance, to acquire and/or rehabilitate properties for transitional housing for persons in recovery with substance abuse disorders. Note that transitional housing constitutes a “public facility” for national objective purposes (limited clientele).

Threshold factors and grant size limits:

Additional threshold factors shall be identified in the *CDBG PY26 Application Handbook*. The state may award one or more grants under this program. No grant shall exceed the state’s total CDBG-Recovery Housing allocations.

Consolidated Homeless Fund (State ESG Program)

To increase program performance and efficiency, while reducing administrative burden, the Emergency Solutions Grant (ESG) Entitlement Cities of Pawtucket, Providence, and Woonsocket have joined with the Rhode Island Department of Housing, Housing Resources Commission, and the Department of Human Services (in accordance with a The Rhode Island Department of Housing MOA) to create the Consolidated Homeless Fund Partnership (CHFP). Herein the State of Rhode Island will be referred to as the CHF Partnership. State ESG formula allocations (\$716,492) are combined with the ESG funds allocated to entitlement communities (\$700,468.00) with additional state funds coming from a direct allocation to the Housing Resources and Homelessness Restricted Receipt (HRHRR) account (\$12,500,000) and a pass through of social service funds from the Title XX program (\$1,272,598). In total, the CHF will have available approximately \$15 million for PY27. Note: of the \$716,492 State ESG award \$53,736.9 will fund administrative costs, leaving \$662,755.1 to be included in the Consolidated Homeless Fund.

There is an admin cap of 7.5% of the ESG award. Also, no more than 60% of the ESG award (or the 2010 hold harmless need amount, whichever is greater) will go towards funding outreach and shelters.

Selection criteria and relative importance:

The proposal selection and project approval process shall consist of a three-step process as described below:

Step 1: Threshold evaluation. EOH staff will conduct a threshold review of all applications. The threshold review will determine the following:

- Application Completeness
 - Proposal(s) submitted on time
 - All forms were complete and signed
- Applicant Eligibility

- Vendor must be a governmental agency or non-profit organization and able to conduct business in the State of RI, and legally able to contract with the Executive Office of Housing.
- Applicant Agrees to Comply with CHF Requirements

Applications found to be technically or substantially non-responsive at any point in the evaluation process will be rejected and not receive further consideration.

Step 2: Technical scoring. All applications that meet the threshold criteria listed above will be forwarded to the CHF/CoC Recipient Evaluation and Approval Committee. The review committee will advise and consult with the EOH scoring committee and EOH will thoroughly review and evaluate the applications against the criteria outlined in the Request for Proposals (RFP).

Step 3: Final scoring and selection by CHFP partners. The EOH and the CHFP may select proposals for funding based solely upon the Technical Scoring (highest to lowest) or may separate proposals into categories and select the highest scoring proposals within each category. Categories may include, for example, funding source, geography served, population served and/or project type.

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government and non-profit organizations, including community and faith-based organizations (an ESG-specific question)

State ESG funds are pooled with entitlement ESG funds (Pawtucket, Providence, and Woonsocket) along with other state and federal homeless funding to consolidate the process of applying for funds to operate emergency shelters, provide essential services, conduct street outreach, and provide rapid rehousing and state rental assistance. Applicants do not explicitly apply for State ESG funds when they apply but receive an award from EOH after consulting with the Consolidated Homeless Fund Partnership. State ESG funds are used to cover only those activities that are eligible under the ESG regulations. The state makes ESG funds available to units of general local government and non-profit organizations, including community and faith-based organizations.

For ESG, grant size limits include the total amount that may be used for services and emergency shelter (#2 & #3 above) will not exceed 60% of the CHF Partnership’s fiscal year grant or the amount of PY26 grant funds committed for homeless assistance activities (hold harmless need amount), whichever is greater. Given these limits, on an annual basis, up to 60% of State ESG funds may be used for shelter operations and essential services and the remainder is made available for rapid rehousing and/or HMIS.

Resource allocation by funding category

Private not-profit organizations are eligible to apply for funding. Grants may be used for one of more of the following activities:

1. Street Outreach and Regional Access Points - Funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people (“unsheltered homeless people” means individuals and families who qualify as homeless under paragraph

(1)(i) of the “homeless” definition under § 576.2.) for the purposes of connecting them with emergency shelter, housing or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. The eligible costs and requirements for essential services consist of: engagement; case management; emergency health and mental health services (services that are typically paid for with Medicaid funds are not eligible for funding); transportation and services for special populations.

2. Emergency Shelter – Funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters. Each of these are described as follows:
 - A. Essential Services – CHFP funds may be used to provide essential services to individuals and families who are in an emergency shelter, as follows: Case Management, Childcare, Education Services, Employment Assistance and Job Training, Outpatient Health Services, Legal Services, Life Skills Training, Mental Health Services, Substance Abuse Treatment, Transportation and Services for Special Populations.
 - B. Shelter Renovations – Eligible costs include labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a governmental entity or private nonprofit organization. *However, due to the limited availability of CHFP funds, priority will be given to Essential Services and Shelter Operation activities. Applicants are encouraged to pursue other sources of funding for shelter renovation activities.*
 - C. Shelter Operations – Eligible costs are the costs of maintenance, including (minor or routine repairs) rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter.

Individuals and families defined as Homeless under the following categories are eligible for assistance under Emergency Shelter:

- Category 1-Literally Homeless
- Category 2-Imminent Risk of Homeless
- Category 3 –Homeless Under Other Federal Statutes
- Category 4- Fleeing/Attempting to Flee DV

3. Rapid Rehousing – Rapid Rehousing projects are designed to help those who are homeless quickly transition out of homelessness into permanent housing. The primary goal is to address the barriers and challenges that cause individuals and families to be literally homeless, while also working to stabilize project participants in housing through the provision of wrap around services after the family or individual obtains housing. RRH projects must offer participants supportive services to help them achieve long-term housing stability. Project/program participants are required to meet with a case manager at least once a month and should have access to a broad array of additional services to help them maintain housing. In

addition, services may be provided for up to 6 months after the rental assistance ends.

Eligible expenses include:

a) Financial Assistance-

- *Security Deposits* - CHF funds may pay for a security deposit that is equal to no more than 1 months' rent.
- *Moving Costs* - CHF funds may pay for reasonable moving costs, such as truck rental or hiring a moving company.
- *Rent* - CHF funds may be used to provide up to 24 months of rapid rehousing during any three-year period. Project based rental assistance is allowed, provided that the property is not owned by the Sub recipient/Contractor.
- *Landlord Risk Mitigation Funds* - Funds to reimburse landlords for damages to a unit beyond the amounts covered by a security deposit. No more than an incidental amount should be set aside for landlord risk reduction funds. Only certain funding sources may be used for landlord mitigation services.

b) Services Costs - Subject to specific funding source requirements, CHF funds may be used to pay the costs of providing the following services:

- *Housing Search and Placement/Housing Navigators* - Services or activities necessary to assist project participants in locating, obtaining, and retaining suitable permanent housing.
- *Housing Stability Case Management*-CHF funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.
- *Financial Literacy/Credit Repair*-CHF funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Household Eligibility: Rapid Rehousing assistance may be provided to program participants who meet the criteria Category 1-Literally Homeless and Category 4- Fleeing/Attempting to Flee DV. Applicants applying for Rapid Rehousing funds must utilize the coordinated entry system as required under 576.400 to evaluate individuals and families applying for or receiving rapid rehousing.

4. Other projects including homeless prevention/housing problem solving and system-wide homeless programs Housing Problem Solving is a person-centered, housing-focused approach to explore creative, safe, and cost-effective solutions to quickly resolve a housing crisis. It is an approach for households experiencing homelessness that is not dependent on the same standardized assessment used for other housing resources, screening, eligibility, or prioritization and does not require significant financial resources. The goal of this group of interventions is to assist households by preventing housing loss and helping households who have lost their housing regain stability quickly without utilizing longer-term

mainstream homeless assistance resources.

In addition to programs historically funded through the CHFP, we seek proposals that decrease the number of people experiencing homelessness and the length of time people spend homeless.

Innovative system-wide and systems projects need to meet one or more of the goals listed below:

- Increase the supply and access to affordable permanent housing for very low-income households.
- Retool Homeless Crisis Response System to be more effective in preventing/ending homelessness.
- Increase economic security for people experiencing homelessness or those at risk of becoming homeless.
- Improve Health and Housing Stability.
- Increase Leadership, Collaboration, and Civic Engagement.

Innovative projects that support the goals listed above include navigation projects that focus specifically on hard-to-house populations.

The CHFP retains the right to reduce, amend, or eliminate applications and/or awards based on the availability of funding and forthcoming federal regulations for the programs listed.

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

Yes

Available Grant Amounts

Application Period and Grant Limitations

- The state will accept applications throughout the year. Total state exposure will not exceed \$25 million dollar at any one time. Local accrued awards shall be limited to \$10 million dollars at any one time.
- There are no application minimums or maximums.

Acceptance process of applications

Rhode Island Section 108 Loan Guarantee Program

In accordance with applicable federal regulations, additional security is required to assure repayments of the guaranteed obligations and may include assets financed by the guaranteed loan. Third party credit underwriting is required to determine if the project is an acceptable credit risk, and the collateral meets security requirements.

Guaranteed loan funds may be used for the following activities, provided that said activities are designed to produce revenue: (1) Acquisition of improved or unimproved real property in fee or by long-term lease, including acquisition for economic development activities; (2) Rehabilitation of real property owned or acquired by the entity applicant, city or town or its designated public agency; (3) Payment of interest on obligations guaranteed under the 108 Program; (4) Relocation payments and other relocation assistance; (5) Clearance, demolition, and removal, including movement of structures to other sites, or building and improvements on real property acquired or rehabilitated pursuant to numbers 1 and 2 above (6) Site preparation, including construction, reconstruction or installation of public improvements, utilities, or facilities (other than buildings) related to the redevelopment or use of the real property acquired or rehabilitated pursuant to paragraphs and above; (7) Payment of issuance, underwriting, servicing and other costs associated with private sector financing of notes or other obligation guaranteed under this subpart; (8) Economic development programs including acquisition, construction, reconstruction, rehabilitation or installation of commercial or industrial buildings, structures or other real property, equipment, and improvements. Assistance may be provided to private-for-profit, and private or public nonprofit sub-recipients where assistance is appropriate to carry-out the economic development activity; (9) Acquisition, construction, reconstruction, rehabilitation, or installation of public facilities (except for buildings for the general conduct of government), site improvements, and utilities, for an economic development purpose; (10) A debt service reserve in accordance with requirements.

Successful applicants will receive project money from HUD, but the repayment of those funds is guaranteed by State CDBG. The state pledges that future CDBG grant monies will repay the federal government should a non-entitlement recipient of a Section 108 Loan guarantee default. Because of this provision the state will develop an application that provides for stringent review with the following criteria: Clear definition of the project goals

and activities; Effective and capable local management; Analysis of secondary economic and fiscal impacts; Revenue projections and firm financial information on the proposed project; Total housing units developed for permanent affordable housing; Percent of low/moderate jobs created over the fifty-one percent National Objective minimum; Percent of jobs to be documented as "taken by" low/moderate income persons; Ratio of loan guarantee dollars to the number of low/moderate income persons; Percent of permanent affordable housing units developed over the fifty-one percent national objective minimum; Ratio of loan guarantee dollars to permanent affordable units developed; Leverage of non-government funding; Extent of Consolidated Plan/CHAS/local Affordable Housing Plan consistency.

The state will grant special consideration and encourage applicants that: (1) Are located in or directly benefit the state and federal enterprise zones; (2) Are part of the comprehensive community or neighborhood revitalization program.

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

No

State’s Process and Criteria for approving local government revitalization strategies

Not applicable

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AP-50 Geographic Distribution – 91.320(f)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

As is referred to in SP-35, the general strategy of the LIHTC program is described in the state's 2026 QAP, which states 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")."

HOME funding is available to all communities in the State, with the general exception of Providence, Pawtucket, and Woonsocket, which receive HOME allocations directly from HUD. However, applicants from these three communities may be eligible for State HOME funding if the entitlement entities do not have sufficient funds available for a specific activity. The scoring system favors communities with the lowest percentage of affordable housing units to encourage a more equitable distribution of affordable housing throughout the State.

State CDBG funds for housing rehabilitation, economic development, and affordable housing are available for 33 of the 39 cities and towns in Rhode Island. The Cities of Cranston, East Providence, Pawtucket, Providence, Warwick, and Woonsocket are all entitlement communities that receive CDBG allocations directly from HUD. Therefore, these six entitlement communities are not eligible under the State CDBG program.

The State anticipates that CDBG-Recovery Housing funds will be available statewide. However, such guidance/waivers had not been issued by HUD at time of publication.

The Consolidated Homeless Funds has five regional zones for allocation purposes, with a maximum of 15% of all allocated funds through the CHF going to Northern Rhode Island (which includes one entitlement community, Woonsocket), and a maximum of 10% of allocated funds going to East Bay Rhode Island, Southern Rhode Island, and Kent County each. According to the 2016-2017 CHF Request for Proposals, 70-75% of all CHF funds will be allocated to assist programs in Providence and the Metro Providence vicinity.

HTF funding is available to all communities in the state. However, priority will be given to communities who have yet to meet or exceed state requirements that at least 10% of housing stock is affordable. Only six of the state's 39 municipalities meet this threshold, though these six towns combine to contain 25% of the state's non-seasonal housing units. Geographically based distribution criteria for HTF funds also include factors that contribute to improving or sustaining economic opportunity for the future tenants or owners of the homes developed. These criteria include additional points for accessibility to transit, accessibility to employment centers, accessibility to high performing schools and accessibility to community services

Rationale for the priorities for allocating investments geographically

The rationale for the prioritization for the development of affordable housing in those communities

not currently with a sufficient stock is directly related to the legislative findings in Rhode Island General Law § 45-53-2 that “it is necessary that each city and town provide opportunities for the establishment of low- and moderate-income housing”. The legal definition for a municipality containing a sufficient stock of low- and moderate-income housing can be found in § 45-53-3(4)(1). HOME and LIHTC funding for affordable housing production prioritize housing in areas found not to contain enough low- and moderate-income housing for the purpose of helping each city and town in the state to provide affordable housing opportunities.

Regardless of the eligibility of a municipality or consortium to apply for funds, allocation amounts are contingent to two other geographic considerations. First is the need of that community and second is the project’s growth category as identified in Housing 2030, or whether it is located in an Opportunity Zone.

Local Plan Compliance threshold requirements in CDBG applications also places a priority, as a result of needing to be in compliance with a municipal comprehensive plan, on the development of affordable housing in communities that have not reached the statutory requirement of having 10% of its housing stock be affordable (deed-restricted and/or subsidized) to low-to-moderate income households.

Homelessness program funding is directed to the entitlement communities that participate in the Consolidated Homeless Fund to the degree to which they contribute to the fund, plus added need based on applications from service providers. These geographic distributions of funding are not a requirement of the Consolidated Homeless Fund but is estimated annually based on the location of programs that have been funded in the past and the statutory requirement of entitlement ESG funds going to each respective entitlement community. The State’s ESG funds, as a result of other funding sources that are devoted for the entitlement communities, often fund programs in Southern Rhode Island, Kent County, and the East Bay, but this is not a requirement of State ESG distribution.

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

In PY26, the state plans to serve a total of 899 households through affordable housing programs, including 51 homeless households, as well as 848 non-homeless households. The majority of persons served with affordable housing will be through the development of long-term affordable rental and homeownership opportunities or through the extension of affordability of units in which the household already resides, while the remaining households will be served through rental assistance.

TABLE VIII – ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT

One Year Goals for the Number of Households to be Supported	
Homeless (Homeless Housing Added, NOP, RHP)	45
Non-Homeless (Rest Goal 1 and 2)	848
Special-Needs	0
Total	893

TABLE IX – ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE

One Year Goals for the Number of Households Supported Through	
Rental Assistance (TBRA, NOP, HOPWA, RHP)	333
The Production of New Units	94
Rehab of Existing Units	466
Acquisition of Existing Units	0
Total	893

Discussion:

The state plans to fund the production or preservation of 560 low- to moderate-income homes with the resources it has available, rehabilitating 466 existing structures (either producing new affordable options or preserving existing housing) and 94 homes constructed new (all of which will be counted as new affordable housing options). It is estimated that 45 new affordable units will be devoted to house homeless or formerly homeless households, the balance will serve non-homeless households. Though it is not a specific outcome stated as an accomplishment for Goal 1, many of the households served through the production or rehab of

units for the development of affordable housing will contain special-needs populations.

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All persons and households assisted through the accomplishments of Goal 2 are counted as homeless households supported in TABLE IX, as are the 45 units of rental housing for the homeless added in Goal 1. The eCon Planning Suite: Desk Guide for this section asks applicants to “not include the provision of emergency shelter, transitional shelter, or social services” to the total of households supported, thus only HOPWA, NOP, and RHP outcomes are included from Goal 2. These outcomes combine to support homeless households through rental assistance. The remaining goal outcomes of Goal 1 combined together equal the number of non-homeless households supported by affordable housing in PY26.

The above referenced figures were based on historic program performance, current unit production costs and anticipated financial resources at the time of the 2025-2029 ConPlan was developed.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

RIHousing, in its role as a PHA, works to ensure that all people who live or work in Rhode Island can afford a safe, healthy home that meets their needs.

Actions planned during the next year to address the needs to public housing

Use the Housing Choice Voucher Program (HCVP) to further HUD's Opening Doors initiative to end homelessness. Since 2015, RIHousing has adopted a homeless preference in the Housing Choice Voucher Program. In calendar years 2016, 2017, and 2018, 100% of new admissions to the HCV Program were homeless households. RIHousing adopted a new preference for families "moving up" from Permanent Supportive Housing to the HCV Program. The "move-up" preference is part of a larger effort among RIHousing and community services providers to increase housing opportunities for homeless families and individuals. By moving families from supportive housing into the HCV Program, additional supportive housing opportunities will be created for currently homeless households. In 2021, RIHousing elevated its preference for families currently in an unstable housing situation, where they are receiving a subsidy that is set to expire or otherwise end and are at increased risk of homelessness.

Work with other Public Housing Authorities to more effectively meet the housing needs of all families.

RIHousing successfully opened the Centralized Waitlist Portal on December 17, 2017, with 19 agencies currently participating throughout the state, and plans to make efforts to encourage the remaining Rhode Island housing authorities to join the system in PY24. The Centralized Waitlist allows potential applicants to access one application for thirty-four project-based voucher wait lists and the wait list for eighteen housing choice voucher programs all from one online portal.

Better utilize state and federal funds to provide residents with additional supports and perform better owner outreach. RIHousing launched a robust Landlord Recruitment strategy that includes outreach to communities across the state as well as providing local real estate agencies with information regarding Housing Choice Voucher Program. In 2021, RIHousing hired a Housing Navigator to conduct outreach in the field and serve as a point of contact for prospective landlords. The quarterly landlord newsletter also remains active with the goal of educating the population of landlords who participate in the HCV program by providing resources to them. Governor McKee's FY22 Budget also included the creation of a \$6 million "Pay for Success" permanent supportive housing (PSH) pilot program for those experiencing chronic homelessness in Rhode Island. Supported by social impact bonds, the initiative aims to improve the services received by chronically homeless households, prevent crises, and decrease the utilization of emergency services. By increasing spending for preventative services, the program is expected to save the state between \$1.8 million and \$2.6 million

per year by reducing emergency care and justice system expenses for approximately 125 chronically homeless Rhode Islanders.

Actions 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 over 142 participants actively enrolled in the program, of which 77 have established an escrow savings accounts, totaling over \$507,939. Family Self Sufficiency (FSS) enables individuals and families who receive assistance through the Housing Choice Voucher Program (HCVP) on improving their credit score, pursuing higher education and vocational training and obtaining gainful employment. In 2025, we had 14 families graduate from the program and disbursed over \$159,043 in Family Self Sufficiency (FSS) escrow funds.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

The 2012 Opening Doors Rhode Island: Plan to End Homelessness in Rhode Island guides the State's plan for homelessness alleviation and prevention. Actions in PY2026 planned to address outcomes of the 2012 plan include: (1) Coordinated assessment / application process for supportive housing programs– The CoC refers to supportive housing programs solely through its Coordinated Entry System, allowing centralized, equitable access to homeless service programs. The CoC conducted a third-party evaluation of the CES in 2024. The CoC's has reviewed the recommendations from the evaluation and updated its CES in response to the evaluation. Changes included:

(1) Thoughtful regionalization of the CES, improvements to system performance data collection and stewardship, and ongoing refinement of the universal assessments; (2) Expand Veteran Housing Opportunities: The local Veterans Affairs Medical Center connected to the CES and HMIS in PY2022, which has bolstered both the CoC and VA's ability to coordinate resources on behalf of mutual clients. This partnership expanded in PY2025 with the VAMC exploring becoming a partner in RIHousing's Continuum of Care programs to deliver permanent supportive housing to veterans who are not otherwise eligible for VA assisted housing programs, but are eligible for VAMC services and need deeply subsidized housing; (3) RIHousing will continue to work with PHAs in PY2026 to implement a common application process and to utilize the centralized housing choice voucher waitlist (shared by RIHousing's PHA program and local PHA programs) to coordinate information regarding prioritized populations; (4) Coordinate training activities for supportive housing providers – the CoC funds training and advises providers on how to take advantage of trainings, with an emphasis on peer training; (5) Increase economic security. The CoC implemented performance measures for its grantees to measure increases to economic security. Additionally, the CoC continues to develop partnerships and invest in programs to support client's continued economic advancement; (6) Continue to apply for supplemental CoC funding opportunities to increase CoC's ability to invest locally.

Supplemental CoC funding opportunities anticipated to be issued in PY2026 may include capital funding and funding to address unsheltered homeless. The CoC successfully increased its local funding through its annual CoC award in FY2024-25 and onboarded new programs (awarded in PY2023) to support permanent supportive housing in RI and supportive housing for survivors of domestic violence.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Rhode Island Executive Office of Housing (EOH) administers the Consolidated Homeless Fund (CHF), which provides grant funds to nonprofits and other entities that provide services to people experiencing homelessness including Street Outreach and Regional Access Points.

Street Outreach projects are designed to assess the immediate needs of people experiencing homelessness in unsheltered locations, connect them with emergency shelter, housing, and human services, and offer them urgent non-facility-based care.

Through the annual CHF RFP, applicants are encouraged to think beyond meeting traditional street

outreach goals by emphasizing the need to work with people experiencing homelessness to develop and implement a housing plan to end their unsheltered homelessness. For street outreach providers, this means strengthening the link between Outreach and Coordinated Entry through the completion of housing assessments, assisting participants in navigating the temporary emergency shelter and coordinated entry systems, and actively engaging in housing problem solving and case conferencing. A strong commitment to recording data and tracking outcomes to regularly evaluate the effectiveness of projects, and working with the Executive Office of Housing, CoC, and other partners to adapt to local constraints to solve implementation issues and be as effective as possible.

The purpose of the Regional Access Point is to provide individuals and families experiencing homelessness with centralized, easy-to-access entry points to housing-related services, including Emergency Shelter, case management, housing navigation, mental health and substance use services, and other critical resources. The goal is to facilitate individuals' transition from homelessness to stable housing and improved well-being. The Regional Access Point provides a comprehensive range of services and opportunities for “warm handoffs” to other service providers for persons experiencing homelessness. The Regional Access Point model has increased diversion and access to Emergency Shelter and has continued to build on the regionalization approach of the CoC.

Addressing the emergency shelter and transitional housing needs of homeless persons

It is one goal of the Coordinated Entry System to help people move out of emergency shelter and into stable housing as quickly as possible. To this end, the Rhode Island Executive Office of Housing (EOH) administers the Consolidated Homeless Fund (CHF) and utilizes state ESG, Title XX block grants, and other state resources to fund our emergency shelter system.

Emergency Shelters provide temporary shelter for individuals, families, and/or specific populations experiencing homelessness where the occupants are not required to sign leases or occupancy agreements and where occupants are connected to resources and services to help end their homelessness. EOH is committed to ensuring that all Emergency Shelter projects are housing focused in service delivery and are in alignment with the overall system approach of a progressive engagement philosophy in housing plans. As such Emergency Shelters focus on helping households access and sustain permanent housing as quickly as possible. CHF or leveraged funds may be used to provide essential services to individuals and families who are in an emergency shelter, as follows: Housing Navigation, Case Management, Childcare, Education Services, Employment Assistance and Job Training, Outpatient Health Services, Legal Services, Life Skills Training, Mental Health Services, Substance Abuse Treatment, Transportation and Services for Special Populations

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

Supportive housing is a nationally tested approach to permanently break the cycle of homelessness by providing the people experiencing homelessness, including the chronically homeless, with affordable housing in combination with individualized, wrap-around services including supports focused on obtaining and maintaining housing. In

2023, Rhode Island had 1,759 supportive housing units that included 2701 beds. This supportive housing provided case management and a variety of supportive services (such as mainstream and non-mainstream benefit application assistance, behavioral health services, financial literacy, education attainment, job skill and life-skill training) to individuals and families who had experienced homelessness.

The Rhode Island Coordinated Entry System Lead Agency, the Rhode Island Coalition to End Homelessness manages referrals of households experiencing homelessness into available supportive housing programs. In supportive housing settings, funded primarily through RICoC and CHF programs, residents sign leases, pay rent and care for their own apartments.

In routine performance evaluations, the CoC measures provider's: timeliness in moving households quickly from homelessness into housing, ability to facilitate access for homeless individuals and families into affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again, among other performance measures. Creating access into other affordable housing opportunities provides a next step in the potential continuum of independent living options for formerly homeless individuals and families. Therefore, case managers and housing service providers deliver information and assistance to formerly homeless households on attaining housing vouchers, locating available affordable units and mortgage application assistance for people experiencing homelessness who qualify.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

DCYF has a policy not to discharge clients into homelessness and committed to this policy through an agreement with OHCD. Children in foster care are not reunited with their families unless stable housing is secured. Families receive short term financial assistance and support services when housing is the primary barrier to reunification. Youth unable to go home are given the option of participating in DCYF's Voluntary Extension of Care (VEC.) VEC supports young adults in DCYF care at age 18 who choose to continue services.

RIHousing partners with DCYF to deliver the Foster Youth Initiative program, which links youth aging out of services with the department with a housing choice voucher. In PY 2025, RIHousing also fully leased and maintained its new award of Family Unification Program (FUP) vouchers in partnership with DCYF. The FUP provides housing choice voucher assistance coupled with supportive services to (1) families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child/ren, in out-of-home care; or the delay in the discharge of the child/ren to the family from out-of-home care; and (2) youth who left foster care and are homeless or are at risk of becoming homeless. The DCYF and RIHousing are coordinating on an application for additional Foster Youth Initiative Vouchers in PY26.

An agreement between the Dept. of Health (DOH) and dictates that hospital patients are not 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. If the person is unstably housed or homeless, some hospitals may discharge into EOHHS funded respite care. Discharge planners in assisted living facilities are trained to identify mainstream housing opportunities and to pair placements with

Money Follows the Person (MFP) Program long-term care services. MFP transitions eligible individuals who are in a qualified institutional setting for 90 days or more into a qualified community-based residence. The program assists participants as they transition into the community, with the appropriate supports, so that they can experience more independence and a better quality of life.

An agreement between BHDDH and OHCD dictates that patients of mental health institutions are not to be discharged into homelessness. BHDDH supports Supportive Housing with PATH and SAMSHA grants for client-centered permanent housing.

In PY2026 RI Housing, BHDDH and EOHHS plan to partner on an application to expand HUD's 811 project rental assistance program for people with disabilities that are engaged in BHDDH services and/or are high utilizers of Medicaid and are at risk of homelessness. If awarded, the application will create 150 additional units of subsidized housing beginning in PY2027.

BHDDH provides planning assistance and services for the development and implementation of behavioral health prevention, treatment, and recovery support policies, programs, and services. BHDDH 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.

Developing coordinated reentry strategies that include social services and life skills training, in addition to the traditional supervision of probation and parole, helps ex-inmates break the cycle of incarceration. 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. RI has a comprehensive approach to address offender reentry (established through Executive Order 04-02). This approach, facilitated with technical assistance from the National Institute of Corrections, represents the combined efforts of the Department of Corrections, the state legislature, numerous other state agencies, local governments, law enforcement and countless community agencies.

AP-70 HOPWA Goals – 91.320(k)(4)

The state is not a HOPWA formula grantee, but the state of Rhode Island has received competitive HOPWA awards, including a \$2,083,633.00 three-year award granted in 2022. As described in the Strategic Plan, specifically shown in TABLE 56, HOPWA contributes to Goal 2, to prevent and end homelessness in the state, and anticipates serving 50 households per year in 43 units. **HOPWA contracts are still being processed, this section will be updated.**

In Program Year 23, year four of the current planning period, the state will support units provided in permanent housing facilities developed, leased, or operated with HOPWA funds for 36 households and units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds for 14 households.

The City of Providence is a formula grantee of HOPWA funds, in which it receives approximately \$1 million per year to serve persons living with HIV or AIDS. The City of Providence is responsible for describing the annual goals of its HOPWA program.

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

The State, through its laws, tries to balance the need to incentivize economic growth by preserving the state's natural and historic resources, and recognizing the local costs that growth may impose. Many state policies and requirements aim to protect the environment as well as the health and safety of residents. Municipal policies often aim to preserve the character of the community while promoting growth at a pace the community feels it can support. Though important and well-intended, these policies can increase the cost to develop housing and limit opportunities for residential development. The state has tried to mitigate these effects by reducing costs and helping to address the need for more affordable housing options.

In the past, the state has identified the following general barriers to affordable housing: lack of public infrastructure (water, sewer) in non-urban areas, zoning, land use controls, high construction and land costs, property taxes, etc. The Fair Housing Action Plan has identified the below impediments to fair housing:

- Inadequate Supply of Affordable Housing
- Inadequate level of public transportation
- Public opposition to new affordable housing development in some municipalities
- Inadequate funding level
- Unequal outcomes in mortgage lending

State strategies to ameliorate the barriers to affordable housing include:

1. Prioritize preservation of existing affordable housing and development of housing in areas with a shortage of affordable homes or that are part of a community revitalization plan
2. Improve the quality of existing units
3. Identify and preserve assisted housing developments whose period of affordability expires within five years, with priority given to developments in growth and high opportunity areas
4. Expand the Housing Choice Voucher Program to growth/opportunity areas
5. Seek improvements to the Low- and Moderate-Income Housing Act (RGL: 45-53) to strengthen enforcement of the 10% affordable housing goal and provide incentives to help communities achieve it
6. Expand homeownership opportunities
7. Work toward reducing zoning barriers to affordable housing production
8. Incentivize new multi-family rental production in transit-oriented destinations (TODs)

9. Create an educational campaign on affordable housing as an economic incentive
10. Expand resources for affordable housing production and preservation
11. In Collaboration with all Analysis of Impediments participants, provide statewide fair housing education and outreach
12. Enforce AFFH certification with sub-recipient units of government

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Actions it planned 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

Advocate for federal and state funding for the development of affordable housing

In 2021, the General Assembly created the Housing Production Fund, the State's first permanent funding stream for affordable housing. The fund received an initial appropriation of \$25 million, with funding being placed into a restricted receipts account from the real estate transfer tax on transactions over \$800,000. The initial allocation was divided across three programs: 1) \$10 million for affordable housing production (HPF); 2) \$10 million for operating support to allow developments to serve extremely low-income households (HPF-ELI); and 3) \$5 million of municipal technical assistance. An additional \$12.7M in funding was transferred to RIHousing in late 2025, which was divided among the production and municipal technical assistance programs. HPF capital funds have been awarded in 2022-2025 and, to date, have financed the development of 627 affordable units. To date, \$9.375 million in HPF-ELI funds has been awarded to twelve developments which will allow those units to serve extremely low-income households for 10-15 years. RIHousing utilized an RFP process to create a pool of consultants for the Municipal Technical Assistance Program (MTAP), which was approved in April 2023. The municipal technical assistance program, designed to help municipalities remove barriers to housing development and increase the supply of affordable housing, launched its first funding round in the spring of 2023. Thirty-two cities and towns received assistance through a total of 36 approved projects, with approximately \$3.3 million awarded. A second round of MTAP funding was made available in the summer of 2025. During the second round, 12 municipalities received assistance through 11 projects. Approximately \$1.1 million was awarded in the second round of funding. MTAP awards have ranged from \$10,100 to over \$290,000. Projects include housing needs assessment and analysis, updating Comprehensive Plans, zoning templates and code updates, planning board trainings, public engagement and education, and infrastructure capacity assessments.

In response to multiple proposals requesting assistance in implementing the 2023 state housing legislation, RIHousing hired a consultant to create a series of guidance documents, template materials, and a video to guide municipal officials as they update zoning ordinances and subdivision regulations. These templates and documents are available for free on the MTAP website. Since that time, two additional rounds of legislation have been passed further streamlining the development permitting and approval process and standardizing that process statewide. Each time the template documents have been updated to provide current resources to help municipalities implement these important changes.

In fall of 2021, Governor McKee proposed the RI Rebounds program to appropriate 10% of the State's American Rescue Plan Act (ARPA) funds. This initial appropriation included \$29 million for housing, with \$15 million for the development of affordable housing, \$12 million for site acquisition, \$1.5 million for Homeless Assistance Programs, and \$500,000 for OHCD Capacity Building.

The Fiscal Year 2023 budget included \$250 million for housing (including the RI Rebounds proposal), with a total of \$90 million for the Development of affordable housing, \$10 million

for a PHA development pilot, \$30 million for a down payment assistance program, \$20 million for workforce housing, \$25 million in Site Acquisition funds, \$25 million for community revitalization, \$10 million for affordable housing pre-development, \$21.5 million for Homeless assistance, \$15 million for Homeless Infrastructure, \$2 million for a Statewide Housing Plan, and \$1.5 million for OHCD pre-development and capacity building.

The Fiscal Year 2024 budget brought the total State and Fiscal Recovery Funds (SFRF) allocated to housing and homeless programs to \$321.5 million. The budget includes \$30 million for homeless infrastructure, \$31 million for targeted housing development – \$27 million of which will fund permanent affordable housing with the remaining \$4 million to fund transit-oriented development, \$4.3 million for housing related infrastructure, \$2.3 million for municipal planning, and \$2.5 million for a municipal homelessness support initiative. \$1.4 million was allocated to proactive housing development to be administered by a newly created subsidiary of RIHousing. The FY24 budget also created a new state housing tax credit program to be administered by the Executive Office of Housing to be used in conjunction with the federal Low Income Housing Tax Credit (LIHTC).

Work with municipalities to improve incentives to develop affordable housing

In addition to the MTAP program described in the previous section, over the past five years, the General Assembly has prioritized legislation designed to increase housing production including through incentives for municipalities. The General Assembly passed legislation that created a municipal infrastructure grant program to issue grants and assistance for infrastructure projects that support job creation, housing, and community development. In January 2023 \$2.5 million was awarded to municipalities through the program. The RI House of Representatives has also established a Low- and Moderate-Income Housing Commission that is assessing the status of municipal implementation of the Low- and Moderate-Income Housing Act and recommending changes. The General Assembly also created a commission to study the area of land use and preservation with a particular focus on local permitting and zoning processes.

Over the past several years, the Rhode Island General Assembly has passed comprehensive housing legislation, introduced by the Speaker of the House. These housing bill packages have taken creative approaches to addressing the state's critical shortage of housing and rising housing costs. The packages have included legislation to streamline the development process, make zoning more flexible, increase housing production, and make better use of existing buildings.

In 2022, the package included bills that created a new Department of Housing (which has since been elevated to the Executive Office of Housing) to coordinate housing programs in the state, streamlined the process for creating Accessory Dwelling Units (ADUs) and broadened the categories of ADUs that are allowed by right, and allowed municipalities to count all units in a mixed-income residential development toward their 10% affordable housing goal as long as they meet certain criteria. Another bill incentivized municipalities to work with the Executive Office of Housing to evaluate municipally owned buildings for redevelopment as

affordable housing.

The 2023 housing package bills included legislation to streamline the appeals process, reduce steps in the zoning and planning review process, broaden the categories of activities that can be approved administratively, make the process for requesting variances, modifications and special use permits less burdensome, and clarify and streamline the municipal review process for comprehensive permit applications. In addition, several of the bills took innovative approaches to increasing housing production by further incentivizing Transit-Oriented Development (TODs) and adaptive reuse of commercial buildings. These different models build on existing structures and transportation systems to create the housing we need in locations with the infrastructure to support it.

In the 2024 session, the Speaker introduced a package of 15 housing related bills intended to further streamline processes, ease zoning requirements, and clarify and clean up changes in legislation passed in 2023. One bill would provide uniform zoning standards for ADUs and clarify when ADUs should be a by-right permitted use. Another bill would clarify the structure of the Building Code Office and establish a building code education unit while another would create a commission to study the ability of the state's education system to offer degrees/certifications to provide a pipeline of planning professionals. The package also includes legislation that would clarify statewide standards for wetland regulations, create a statewide geographic information system (GIS) with information on land related resources, and create a pilot program allowing municipalities to combine zoning and planning boards into one to allow for expedited processes. Other bills would require municipalities to implement electronic permitting for all development applications and amend permitted uses provisions to allow, by right, residential uses in commercial zones and in industrial zones unless public health and/or safety would prohibit the use. Two bills would impact manufactured homes; one bill would allow, by right, qualifying manufactured homes to be considered a single-family home in certain circumstances and another would allow municipalities to count mobile home units that meet certain requirements as affordable housing to be applied toward the goal of 10% of a municipality's housing stock to be low- and moderate-income housing. Several bills attempt to incorporate the feedback from municipalities on some of the housing bills passed in 2023, these bills include clarifying various provisions relative to subdivision of land review and amending the requirement of the inclusionary zoning law for affordable housing. RIHousing joined other housing supporters and advocates in testifying in support of this package of legislation.

In the 2025 session, the Speaker introduced a package of 10 bills to continue efforts to address Rhode Island's housing crisis. The first bill would build upon legislation introduced in the previous legislative session, which codified the structure of the State Building Code Office and clarified the role of the State Building Code Commissioner. The second bill would expand the use of electronic permitting, which is mandated for planning and zoning applications. The third bill clarifies the processes set forth in the Zoning Enabling Act and Subdivision Act and to correct issues that are creating unnecessary delays and/or red tape. The fourth bill further clarifies standards and findings required for development to remove subjectivity in the process and further encourages the development of projects including at least 25% affordable housing across the state. The fifth bill would allow the taxes on new housing units to not be

counted toward the maximum tax levy cap under certain conditions. The sixth bill would allow purchasers to reasonably rely on zoning opinions issued by local officials. Previously, when a current or prospective property owner obtains a zoning certificate, the certificate is for instructive purposes only and not binding; this amendment would remove the non-binding nature of zoning certificates to allow property owners to rely on the municipal determination of the legality of the present use. The seventh bill would require municipalities to provide for village or mixed-use zoning to allow residential use in some or all areas of their commercial zoning districts. The eighth bill was designed to encourage additional development in areas within the urban services boundary. The legislation provides that the city or town shall allow residential uses other than solely single-family units in these areas where public water and sewer are available. The ninth bill would allow such type of units where zoning already allows the same density in a vertical style, by way of tenement or other two-, three-, or multi-family structures. The tenth bill would enable municipalities to allow for the use of co-housing arrangements as energy-efficient, low-cost housing options similar to dorms in which there are common spaces, amenities, and facilities, but residents have separate private bedrooms.

Reduce property tax burdens on protected classes

Rhode Island municipalities will continue to provide a variety of property tax exemptions for protected classes, such as for Veterans, the elderly, the visually impaired and blind as well as tax relief for low-income elderly and disabled households that qualify. RIHousing also administers the Madeline Walker program, which gives the Agency the right of first refusal to purchase liens on 1–4-unit owner-occupied properties at tax sale and work with those homeowners to get on a payment plan so that they can remain in their homes.

Under Rhode Island General Laws 44-5-13.11, qualifying affordable apartments are subject to a tax that equals eight percent of the property's previous years' gross scheduled rental income (the 8% tax). The 8% tax is a tool to incentivize the development of affordable housing by limiting the taxes on affordable multi-family developments. Developers who build affordable housing can pay a tax rate that better reflects the deed restricted value of the property rather than a municipalities' regular tax assessment.

Support Housing Development

In addition to the significant packages of legislation in recent years, a number of other bills have been enacted that reduce barriers to housing development including standardizing wetland requirements, the calculation of building permit fees and changing how properties under development are taxed. In 2017, legislation was passed that reduced the time frames for municipalities to review and post decisions on proposed subdivisions. Legislation has also been passed which would make it easier to achieve a quorum for decisions by planning and zoning boards and the State's Housing Appeals Board.

In the FY22 budget, the double taxation on the sale of affordable housing developments was ended. The budget also established Pay for Success, a 5-year pilot program which contracts

with local non-profits to address homelessness. The General Assembly also passed a bill providing that municipalities must adopt and implement electronic construction permitting processes for submission and approval of building permits, plans, inspection scheduling, project tracking and fee collection by July 1, 2023. These steps, along with those being considered this session show the increased attention to the State's housing shortage given the current lack of supply.

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AP-85 Other Actions – 91.320(j)

Introduction:

In addition to the actions detailed in the previous sections, the state of Rhode Island will continue to address the other issues covered in the 2025-2029 Consolidated Plan, including the following:

Actions planned to address obstacles to meeting underserved needs

DCYF operates the Voluntary Extension of Care program (VEC). Participants supports young adults from ages 18-20 who are in DCYF care and want continued help as they begin their adult lives. Any young adults who left DCYF care when they were 18 who wants to come back to DCYF is welcome to do so as long as they are under 21. They also receive guidance creating a tailored budget, and limited funds that help pay for housing and other living expenses. The VEC program's goal is to support young people in becoming self-sufficient, independent, and thriving adults. The program is youth-driven where the young adult, with the assistance of a social worker, works on setting their own goals for housing, education, employment, emotional support systems, and future success. DCYF provides financial assistance for housing as well as money to help with the youth's personal needs throughout their participation in this program.

After executing a Memorandum of Understanding with the RI Department of Child, Youth and Families (DCYF), RIHousing has submitted regular applications to HUD to participate in the Foster Youth Initiative (FYI) and the Family Unification Program (FUP). FYI and FUP are a HUD programs that allows qualified housing agencies to deploy vouchers for youth and families who are or were recently involved with DCYF and are at-risk of homeless. RIHousing is fully leased in its current FUP and FYI program awards and continues to routinely apply to expand its programming in partnership with DCYF as HUD issues funding opportunities. RIHousing has also connected the FYI and FUP youth internally with the Family Self Sufficiency (FSS) program. This voluntary program allows voucher holders to find gainful employment and seek higher education and vocational training for economic mobility. Additionally, this program extends the term of the voucher for FYI and FUP to remain stably housed for two additional years. The FSS program also empowers participants to establish savings by creating an escrow account with monthly deposits from federal funds based on their increase in earnings.

De-institutionalized elderly and disabled

The State will continue to coordinate across agencies to permanently and adequately house de-institutionalized elderly and disabled.

The State has successfully advocated for the statewide accommodation for the development of ADUs on the site of single-family owner-occupied dwellings, for disabled and elderly family members. Such a law prohibits municipalities from restricting in-law apartment development for this use. The statute has since been expanded to allow ADUs by right statewide in many situations.

The re-entry of discharged prisoners into community settings

Most of the work for re-entry is conducted through the local re-entry councils of which probation and parole staff takes the lead in creating. Homeless provider agencies and homelessness advocates participate to create the linkage between the discharge plans and the support systems in the community. They also report on-going housing issues of the re-entry population to the Chronically Homeless/High Need Individuals Committee of the Continuum of Care. Most persons are discharged to their families in temporary situations, so DOC discharge planners ensure that the person has access to all the local information related to housing, community programs and networking activities related to housing. They work with housing outreach workers to locate affordable housing and the SOAR program to access SSI and SSDI. Targeting this population within DOC facilities helps divert many at-risk prisoners from homelessness upon release or shortly thereafter.

BHDDH operates the Transition from Prison to Community Program (TPCP), in conjunction with the Department of Corrections (DOC), the Rhode Island Parole Board. The program's substance abuse treatment providers have been working closely to assist in the transition of inmates back into their communities by providing/coordinating substance abuse services to those

The Rhode Island Department of Corrections continued its work of transitioning offenders, near their releases from prison, with necessary services. Discharge Planners create transition plans, and manage the service of a new Transition Center, a one-stop resource center where released offenders can access community-based and state service providers, receive clarification about probation and gain assistance with applications for public benefits.

OpenDoors will continue to sponsor in PY24 a program called the "9 Yards Program" that provides subsidized housing, educational training and workforce services for six months following prison release.

Actions planned to foster and maintain affordable housing

The state's Executive Office of Housing provides financial and operational support , including rental assistance, rapid re-housing, community development, emergency shelter and transitional housing programs. Proceeds from the state's real estate transfer tax (RETT) partially funds these efforts.

The Public Housing Association of Rhode Island and its 25-member public housing Authorities (PHAs) maintain approximately 20,000 units of project-based and tenant-based housing. These agencies adhere to safety and quality guidelines to ensure these households remain stably housed and able to participate in their communities.

RIHousing, the state's housing finance agency, administers the federal funding for approximately 15,000 project-based section 8 housing units and maintains accountability over a portfolio of nearly 10,500 Low Income Housing Tax Credit units, 2,000 HOME-funded units, and hundreds of state-funded housing units.

Actions planned to reduce lead-based paint hazards

Rhode Island also continues to support the much-needed work in continuing to reduce lead-based paint hazards. Rhode Island has the 3rd 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's LeadSafe Homes Program (LSHP) 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. As stated in the Strategic Plan, Goal 3 of the 2025-2029 Consolidated Plan is to improve the health, safety, and energy efficiency of all Rhode Island homes. LSHP achieves this goal by remediating lead-based paint hazards and expects to complete remediation work using HUD funds in 50 households in PY26. While no set-asides exist within the regulations of the program, historical program data suggests that, in a given calendar year, 60% of funds will go to multi-family projects, either owner-occupied or not, and 40% will go to single family homeowners.

In December of 2025, HUD awarded \$7,739,500 to RIHousing to protect low-income families from lead-based paint and home health hazards. RIHousing plans to use this funding to address lead hazards in 200 homes over the course of four (4) years for low-income families with children and perform healthy homes intervention assessments in another 150 units during the grant period. RIHousing has also received HUD approval to perform these services statewide (excluding the cities of Providence, Pawtucket and Woonsocket where alternative HUD-funded lead programs are running). RIHousing will work with the Department of Health, municipalities, non-profits and CAP agencies to secure additional resources for lead mitigation and continue to improve coordination of resources to meet the broader healthy housing needs of Rhode Island residents.

Actions planned to reduce the number of poverty-level families

EOH 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.

RIHousing will continue to administer a Family Self Sufficiency (FSS) program, which 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 PY24, there will be over 150 participants actively enrolled in the program at any given time, with an estimated 24 families participating in the Housing Choice Homeownership Program.

Actions planned to develop institutional structure

One important step in improving interagency coordination was the creation of a new Department of Housing in 2022, tasked with leading and coordinating housing policies and programs. The Department of Housing was charged with developing and submitting a housing organizational plan to the General Assembly on or before December 31, 2024. This plan was submitted and is available on our website here: <https://housing.ri.gov/data-reports/departmental-reports>. This plan includes a review, analysis, and assessment of functions related to housing of all state departments, quasi-public agencies, boards, and commissions. Provided, further, the secretary, with the input from each department, agency, board, and commission, shall include in the plan comprehensive options, including the advantages and disadvantages of each option and recommendations relating to the functions and structure of the department of housing, including suggested statutory revisions. The Department of Housing recommended a consolidated governance model that aligned authority and responsibility to drive meaningful coordination across policy, planning, and financing, and in so doing, advance transparency and accountability. The Department of Housing recommended:

1. Evolving the Department of Housing to become the Executive Office of Housing (EOH) with consolidated authority to lead statewide housing and homelessness strategy, drive interagency coordination, coordinate financing to achieve strategic plan goals, and support municipalities in navigating state systems and gaining technical assistance.
2. Appointing the Secretary of Housing as the statutory chair of RIHousing to ensure a substantive tie between policymaking and financing.
3. Establishing two interagency councils to drive interagency coordination by reactivating the Interagency Council on Homelessness and creating an Interagency Council on Housing Production and Preservation.
4. Consolidating the Human Resources Commission and the Advisory Council to the Interagency Council on Homelessness into an overarching Advisory Council on Housing and

Homelessness.

5. Eliminating the Housing Resources Coordinating Committee (HRCC), with the Department of Housing taking on the responsibility for interagency coordination and the Housing Production Fund (HPF).
6. Recommending that the RI Continuum of Care consider potential updates to the governance charter to ensure alignment with these state organizational plan changes, including using the Interagency Council on Homelessness for its ratification committee and, in the long-term, considering utilizing the Executive Office of Housing as the collaborative applicant to bring further alignment between CoC and Executive Office of Housing statewide planning functions.

In the 2025 legislative session, the General Assembly adopted the above recommendations, officially renaming the Department of Housing to the Executive Office of Housing.

The Rhode Island Continuum of Care will continue to improve and formalize its institutional structure in PY26. One full time CoC planner is employed by the CoC's Collaborative Applicant, RIHousing, to coordinate the programs serving homeless persons in the state across various governmental and nongovernmental agencies through planning and monitoring. RIHousing is expanding its investment into strategic planning and in the process of engaging a second CoC planner to increase its productivity in homeless systems planning and improvements. This will allow for expanding strategic initiatives and partnerships for the Continuum and applications for supplemental CoC funding to support the RICOc's goals in ending homelessness. The RICOc and RIHousing will continue to contract with various consulting agencies with experience planning, operating and monitoring Continuum of Care programs for specific scopes of work in PY2024.

Systems Development and Capacity Building – Consolidated Homeless Fund

The CHFP supports a wide range of activities designed to assist persons at-risk of/or experiencing homelessness every year by developing programs and initiatives to meet the goals of Opening Doors Rhode Island, which are to: Increase the supply of and access to permanent housing that is affordable to very low-income households, Retool and/or train the Homeless Crisis Response System to be more effective in preventing/ending homelessness; increase economic security for those who are homeless or at risk of becoming homeless; improve health and housing stability; and increase leadership, collaboration and civic engagement.

Key components include: Some examples of innovative projects that could support Opening Doors RI are: (1) Providing centralized leadership for homeless outreach projects; (2) Implementing a plan for leadership coordination and reducing duplication of services among shelters; and (3) Navigation projects that focus, specifically, on hard to house populations, such as those who have committed sex offenses, the elderly population, those with co-occurring disorders, etc.

The goal of these actions is to sharply decrease the number of homeless people in RI. The

Coordinated Entry system and the Regional Access Points (RAP), including the diversion processes therein, will serve to not only reduce the number of persons homeless but also reduce time homeless. This institutional development program seeks to connect organizations across the state that can improve the information and outreach that makes clear where people who are homeless can go for help. The intention is also to fund projects that reduce barriers to entering homeless shelters for people who are in crisis and have no place else to go.

The RI Continuum of Care will continue to improve and formalize its institutional structure in PY26. One full time CoC planner is employed by the CoC's Collaborative Applicant, RIHousing, to coordinate the programs serving homeless persons in the state across various governmental and nongovernmental agencies through planning and monitoring. To support the planner, a CoC Planning manager is also partially supported by the CoC and employed by RIHousing, who focuses on expanding strategic initiatives and partnerships for the Continuum and applications for supplemental CoC funding to support the RICoC's goals in ending homelessness. The RICoC and RIHousing will continue to contract with various consulting agencies with experience planning, operating and monitoring Continuum of Care programs for specific scopes of work in PY2024.

Actions planned to enhance coordination between public and private housing and social service agencies

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.

DRAFT

**AP-90 Program Specific Requirements – 91.320(k)(1,2,3)
Emergency Solutions Grant (ESG)**

(i) The State must either include its written standards for providing Emergency Solutions Grant (ESG) assistance or describe its requirements for its subrecipients to establish and implement written standards for providing ESG assistance. The minimum requirements regarding these standards are set forth in 24 CFR 576.400(e)(2) and (e)(3).

(i) Written Standards for providing Emergency Solutions Grant (ESG) assistance:

24 CFR 576.400(e)(3)(i) Policies for evaluation of individuals' and families' eligibility for assistance.

Individuals and families who meet HUD’s definition of Homeless (as defined by HUD Homelessness Categories 1-4) or HUD’s definition of “at risk of homelessness” are eligible to receive services through CHF. Generally, these include individuals and families who are: (1) Literally Homeless (living on the street or in emergency shelter); (2) Imminently Homeless (within 14 days); (3) Unaccompanied youth/families who meet other Federal homeless definition (must also meet additional criteria for HUD, similar to 2); (4) Fleeing/attempting to flee Domestic Violence; (5) At risk of homelessness.

Household composition includes an individual living alone, family with or without children, or a group of individuals who are living together as one economic unit. In all cases a household must lack sufficient resources and support networks necessary to obtain or retain housing without the provision of CHF assistance in order to be program eligible. The type of CHF assistance for which an eligible household qualifies is determined by their homeless status.

Program Participant Eligibility by program type is detailed in the table below:

Program Participant Eligibility by Program Type					
Program	Category 1	Category 2	Category 3	Category 4	Category 5
Street Outreach	X				
Emergency Shelter	X	X	X	X	
Rapid Rehousing	X			X	
State Rental Assistance	X			X	
Homeless Prevention		X			X

Sub-recipients/Contractors are required to participate in and comply with the Continuum of Care Coordinated Entry Process including utilizing a standard COC assessment tool and

protocols. The minimum eligibility process includes screening to determine whether or not the program participant meets one of HUD's categorical definitions of homeless. Eligibility determinations must be documented in client files and preferably through third-party documentation. The Coordinated Entry System utilizes a different intake process with the same assessment for victims of domestic violence and other crimes where safety is a predominant concern to assure client confidentiality.

Within the activity types eligible under the Consolidated Homeless Fund, there shall be additional participant eligibility criteria and recordkeeping requirements. These requirements are described in the "Recordkeeping" section in this document.

24 CFR 576.400(e)(3)(ii) Standards for targeting and providing services related to street outreach.

Purpose

Street Outreach should be principally focused to one goal: that of supporting persons experiencing homelessness in achieving some form of permanent, sustainable housing. CHF street outreach funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Individuals and families shall be offered the following eligible Street Outreach activities, as needed and appropriate: engagement, case management, emergency health and mental health, transportation services (24 576.101).

Target Population

Providers of Street Outreach services shall target unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

Universal Assessment

All individuals and families served through street outreach programs will be assessed using a comprehensive, universal assessment tool in order to make an informed and objective decision on the level of need of each family and streamline eligibility determinations.

HMIS

All CHF funded Street Outreach programs are required to enter clients in the Homeless Management Information System (HMIS) at first contact per the ESG and CoC Interim Rule (24 CFR 576 and 578). This helps to ensure coordination between service providers through the Coordinated Entry System (CES) while avoiding duplication of services and client data and

provides an opportunity to document homelessness.

Coordinated Entry System

To help ensure homeless households receive immediate housing and minimize barriers to housing access, all individuals and families assessed through street outreach should have a housing assessment completed so they can be entered into RI's Coordinated Entry System (CES) through HMIS. CES is a CoC-wide process for facilitating access for housing resources designated for homeless individuals and families. This system ensures that homeless individual or family are known by name, provides housing assistance based on the individual or family's unique needs, and matches them to the most appropriate service strategy or housing intervention. In doing so, CES ensures that limited housing resources are allocated to achieve the most effective results.

24 CFR 576.400(e)(3)(iii) Policies and procedures for admission, diversion, referral and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations.

Emergency shelters must provide temporary, habitable, warm shelter for persons experiencing homelessness who do not have a residence or other place to stay, where the occupants are not required to sign leases or occupancy agreements ("Emergency Shelters") and are connected to resources and services to help end their homelessness. The immediate needs of people experiencing homelessness should be assessed during intake, and efforts to connect individuals and households with long-term solutions should take place through case management.

Emergency Shelter stays should be avoided, if possible, and when not possible, limited to the shortest time necessary to help participants regain and sustain, permanent housing as quickly as possible. All Emergency Shelter projects are expected to conform with the overall system approach of Housing First. As such, shelters are expected to:

- Have few pre-requisites to project/program entry, including, but not limited to:
 - No requirement of minimum income for project/program entry
 - No requirement of "housing-readiness" for project/program entry
 - No drug and alcohol testing for project/program entry
 - No criminal background checks to get in (except as required by law)
- Use a staffing model that includes housing navigation services that aid households in applying to public and private housing waitlists (Coordinated Entry System ("CES") housing queue, Centralized Waitlist, Low-Income Housing Tax Credits, etc.) and completing landlord engagement, outreach, and unit searches
 - Ensure that supportive services are voluntary
 - Accept emergency shelter intakes/referrals in compliance with guidance and protocols established by the Rhode Island Executive Office of Housing (EOH). Work with the Street Outreach providers, Regional Access Points, Coordinated Entry, and other homeless response system providers to ensure clients are referred to the most appropriate housing resources including, but not limited to, rapid rehousing and permanent supportive housing. Applicable mainstream resources should also be presented and made available to clients.

Facility Standards

Emergency Shelter programs will comply with the following facility standards unless otherwise authorized in writing in advance by the RI Executive Office of Housing:

- Structure and materials. The building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents.
- Access. The building must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35; where applicable.
- Space and security. Except where the building is intended for day use only, the building must provide each program participant in the building with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- Interior air quality. Each room or space within the building must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- Water supply. The building's water supply must be free of contamination.
- Sanitary facilities. Each program participant in the building must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- Thermal environment. The building must have any necessary heating/cooling facilities in proper operating condition.
- Illumination and electricity. The building must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the building.
- Food preparation. Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- Meals. Provide at least one meal per day.
- Sanitary conditions. The building must be maintained in a sanitary condition.
- Fire safety. There must be at least one working smoke detector in each occupied unit of the building. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

Eligible Participants

Individuals and families defined as "Homeless" under the following categories are eligible for assistance under Emergency Shelter:

- Category 1-Literally Homeless
- Category 2-Imminent Risk of Homeless
- Category 3 –Homeless Under Other Federal Statutes
- Category 4- Fleeing/Attempting to Flee DV

Subrecipient Entity is required to document eligibility at program entry. Any additional eligibility criteria set by the Subrecipient Entity must be approved by the State Agency, and be in compliance with Fair Housing Law.

Initial Assessment and Prioritization

Subrecipient Entity must have standardized screening and intake criteria in writing for determining eligibility for admission to emergency shelter. The criteria must be in compliance with Fair Housing Law and cannot force involuntary family separation by denying family admission based on the age of a child less than 18 years. The admission process requires an initial assessment to determine the homeless status of the applicant based on HUD's four categorical definitions of homeless (24 CFR 576.2).

The Subrecipient Entity is required to participate and adhere to all updated policies and procedures that are released during the contract year. Subrecipient Entity will work with the HMIS Lead Agency, the RI Executive Office of Housing, and the Continuum of Care regarding data collection, outcome tracking, and resolution of implementation issues to the satisfaction of the State Agency.

Establishment of a Point of Contact

The Subrecipient Entity is required to establish a staff member as a point of contact for the funded project. The Subrecipient Entity contact person should be in a position that is familiar with organizational resources and up to date on current organizational capacity to accept and serve clients. This contact should also be able to provide information to the broader homeless response system on what current programs and resources are available to homeless households seeking assistance. The Subrecipient Entity point of contact will also be responsible for ensuring the Subrecipient Entity's compliance with the following:

1. Ensuring that written standards for client eligibility and screening are established for each CHF project for which the Subrecipient Entity has received funding.
2. Communicating with the Regional Access Points and Street Outreach providers regarding Subrecipient Entity's open shelter beds available by 12pm daily (not including holidays and weekends).
3. Ensure client-level data is entered in HMIS on a daily basis
4. Ensuring that the Subrecipient Entity is using CoC standardized assessment tools and forms for all its CHF-funded projects.
5. Supporting the Subrecipient Entity's participation in the broader homeless response system by ensuring that the appropriate staff person(s) from the Subrecipient Entity is participating (in person or via conference call) in case conferencing pertaining to clients served; and
6. Ensuring that at least one staff member from the Subrecipient Entity attends training sessions provided or hosted by the CoC, EOH, and HMIS Lead and that the training information materials are shared with all staff working on CHF funded project(s).
7. Ensure that Emergency Shelter policies and procedures are posted and ensure shelter guests are oriented about the policies and procedures upon entry.

Ineligible Activities

The following costs and activities are not eligible for funding under this award:

- Depreciation, bad debts, interest, and late fees.
- Public relations, lobbying, or fundraising.
- Entertainment, conferences, and retreats not specifically related to the goals of the CHFP funded project.
- Payment of client credit card or another consumer debt.
- Payment of client mortgage costs and mortgage arrears.
- Cash assistance paid directly to participants.
- Tents, sleeping bags, tarps, and other camping supplies.

Case Conferencing

Within appropriate parameters regarding the preservation of individual client confidentiality as necessary, the

Subrecipient Entity will participate in case conferencing and share data in service of clients and in support of our common mission. This includes collaboration in the context of dialogue regarding best practices, brainstorming regarding community solutions, as well as for the purpose of case conferencing.

Subrecipient Entity must participate in case conferencing meetings pertaining to shelter clients. Case conferencing meetings may include other shelter or street outreach service providers, CoC staff or participants, State Agency staff, or other community or government partners.

Case Management

Subrecipient Entity must provide case management services, which shall include, but not be limited to, the following:

- Using the coordinated entry assessment tool to evaluate individuals and families applying for or receiving rapid rehousing assistance;
- Conducting the initial evaluation including verifying and documenting eligibility for individuals and families applying for rapid rehousing assistance;
- Ensuring all program participants are pursuing permanent housing options, assisting with apartment searches and applications;
- Securing essential personal documents such as birth certificate, driver's license, state ID card, or social security card;
- Developing, securing, and coordinating services and obtaining Federal, state and local benefits such as Medicaid, Supplemental Nutrition Assistance Program (SNAP), disability benefits, veterans' benefits, and others;
- Monitoring and evaluating program participant progress; and
- Providing information and referrals to other providers. Examples of those services include connecting clients to healthcare, harm reduction, and substance use recovery services;
- Actively assisting in employment searches and securing job training opportunities, to include guidance on job applications;
- Working to ensure program participants are successful in employment opportunities, including flexibility for participants working unconventional hours or assistance with planning transportation to job sites through bus passes, etc.

Subrecipient Entity is also required to help each client develop and implement a housing plan to retain permanent housing as soon as possible and after the CHF assistance ends, bearing in mind all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area. The plan is intended to be a guide for both the program participant and the Subrecipient Entity. Housing stability plan components should include:

- Outline program participant goals and steps to be taken to obtain and maintain housing, including whenever relevant and assisting all clients with applications for subsidized housing through the [RI Centralized Waitlist](#);
- Outline roles and expectations of program participant household;
- Outline roles and expectation of the case manager;
- Timelines for each step; and
- Identification of needed community resources, referrals to partnering agencies especially for mainstream benefits, budget education and tenant education.

CHF funds may pay for case management credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Subrecipient Entity shall also maintain confidential records to document services and referrals provided to each client.

Recordkeeping Requirements

Subrecipient Entity is responsible for verifying and documenting the eligibility of all CHF participants prior to providing CHF services and/or assistance. Subrecipient Entity is also responsible for maintaining this documentation in the program participant case file. Subrecipient Entity with insufficient case file documentation may be found out of compliance with CHF program requirements during a State, City, or Federal monitoring. Subrecipient Entity must establish written intake procedures that include requirement of written documentation verifying eligibility for program services.

Client File Documentation

Subrecipient Entity shall establish and maintain sufficient records to enable the State Agency to determine whether program requirements are being met. File documentation will be the basis of State Agency monitoring to ensure Subrecipient Entity follows program requirements and funding regulations. If client file documents and signatures or policy documents are collected and maintained electronically, required documentation must be made available to the State Agency in paper form when requested.

Dismissal and Readmission

Exceptional circumstances where residents may be discharged without a plan in place include: assault of staff or residents, other violent behavior, possession of weapons, trafficking of substances, vandalism or serious behavior that compromises the health and safety of other residents or staff. The shelter may outline in the client’s individual service plan any restrictions on a client returning to the same shelter after discharge. People who have been expelled require the approval of the emergency shelter manager to be readmitted. Suspension from shelter assistance or permanent expulsion will not impede the household from pursuing housing through the Coordinated Entry System.

Forms

Subrecipient Entity may be required to utilize forms provided by the State Agency to document compliance with program rules and requirements. Such forms may include, but are not limited to:

Eligibility and Recertification Documents
HMIS Release of Information Form
HMIS Intake Form (s) for all household members
RI Coordinated Entry System Required Assessment Tools

Chronically Homeless/General Homeless Certification
Written Third Party Verification of Homeless Status
Observation of Homeless Status by Outreach Worker or Intake Staff
Oral Verification of Homeless Status
Self-Declaration of Homeless Status

Performance Standards

Shelter Programs will be evaluated using the following measures:

All projects:	
Performance Standard	Description
Persons Served	The number of people served.
Data Quality	The project maintains adequate data quality in HMIS.
Shelter Projects:	
Performance Standard	Description
Persons served	The number of unduplicated persons sheltered
Shelter utilization rate	Average percentage of shelter beds being used each night, demonstrating that funded beds are available and that the shelter is low-barrier in providing options people utilize at high rates
Housing Assessment	The number and percent of participants that have completed a housing assessment
Exits to Permanent Housing	The number and percent of persons who exit to permanent housing: -Permanent Supportive Housing -Sober housing or other inpatient addiction treatment programs -Rental housing supported with voucher subsidies or unsubsidized -Shared housing arrangements with family, friends, or roommates

24 CFR 576.400(e)(3)(iv) Policies and procedures for assessing, prioritizing, and reassessing individuals’ and families’ needs for essential services related to emergency shelter:

Essential Service Activities serve homeless individuals /families (according to HUD’s definition, 24 CFR 576.2). Households/persons served by these programs must lack a fixed, regular, and adequate nighttime residence, are unable to be served by other housing programs or resources. CHF Providers shall exhaust all available options for diversion.

The Consolidated Homeless Fund Partnership (CHFP)makes essential services available to homeless families or households only if the prior living location is determined to be one of the following: Street, Emergency Shelter, Motel (paid by non-profit), Domestic Violence Safe Home or Fleeing Domestic Violence. Definitions of what the CHFP defines as essential services are listed below:

- Essential services shall address the immediate needs of the homeless, helping them to become more independent and secure permanent housing.

- Essential services for homeless persons may also be operated in or provided by shelters, day centers, or meal sites that are designed to serve predominantly homeless persons.
- Case Management - The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible.
- Child Care - The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13 unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
- Education Services - When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
- Emergency Health Services (Street Outreach ONLY) – Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living. Funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.
- Employment Assistance and Job Training – The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on the job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or

certificates.

Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

- Street Outreach and Engagement – The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.

These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

All providers funded under the Street Outreach activity will provide services to any unsheltered persons that desire to be engaged and provided services. When able, outreach workers shall target services and resources to those with perceived mental and/or physical health issues, so as to improve their access to resources that will improve the clients' safety and wellbeing.

- Legal Services – Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.
- Life Skills Training – The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.
- Mental Health Services – Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. Funds may only be used for these services to

the extent that other appropriate mental health services are unavailable or inaccessible within the community. Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management. Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

- Outpatient Health Services – Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.
- Substance Abuse Treatment Services – Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. Funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

- Transportation – Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities.

24 CFR 576.400(e)(3)(v) Policies and procedures for coordination among providers.

The RI Coalition to End Homelessness (The Coalition) oversees the RI's Coordinated Entry System, which conducts housing prioritization and referral. Outreach workers also conduct these assessments and focus their work on reaching people who are currently living outside unsheltered. RI's homeless system provides a range of outreach services to homeless adults and families as part of its crisis intervention programming and has an outreach van out almost every night. The key to system efforts has been in establishing trust with homeless persons on the street in order for them to enter case management and shelter and/or supportive housing. The EOH trains outreach workers on the housing assessment, processes for shelter access through the Regional Access Points, to take full advantage of outreach workers skills and abilities in reaching and assessing unsheltered persons.

Since the onset of the COVID-19 pandemic in Rhode Island, the homeless management information system (HMIS) has documented an increase in unsheltered homelessness statewide. While the state has added shelter beds throughout the state to attempt to meet the increased need, there are still more people living unsheltered in Rhode Island than have been historically. This makes RI's outreach programs critical in the response to reach and assess people experiencing homelessness.

24 CFR 576.400(e)(3)(vi) Policies and procedures for determining and prioritizing which eligible families and individual will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

Model Eligibility/Entry Requirements -

Priority Populations for Service – used to establish admission priorities relative to other eligible applicants

All Program Models: No additional eligibility requirements can be applied beyond those required by funders or established as a Coordinated Entry policy; All eligibility requirements stipulated by funders will apply.

Permanent Supportive Housing / COC Rental Assistance:

- Requirements: Must meet either HUD definition of literally homeless (category 1) or fleeing domestic violence (category 4) or have met that definition prior to entering transitional or other CoC assisted housing; Must include at least one family member with a disability; Must meet any additional eligibility criteria specified by funding source; Must have a completed CES Standard Assessment
- Priority Populations: Households that have high CES Standard Assessment scores or are deemed appropriate byway of Housing Priorities; Households that have longer length of time homeless relative to other PSH eligible households

Persons and families with members that have high universal assessment scores Rapid Re-Housing must meet HUD's definitions of:

- Literally homeless (Category 1) (all CoC funded projects) Fleeing domestic abuse or violence (Category 4)
- May be Newly and first-time homeless individuals and families
- May be Households who are eligible for PSH but literally homeless and awaiting PSH placement

24 CFR 576.400(e)(3)(vii-ix) Financial Assistance policies and procedures

The Rapid Rehousing/State Rental Assistance Program (RRH/RAP) is intended to serve persons who are living in a Shelter (or on the street). Households eligible for Rapid Rehousing/State Rental Assistance-funded financial assistance and/or services may be individuals and/or families. They MUST meet all of the following criteria:

- Shelter/Street Homeless - Homeless as defined by HUD (ONLY Category 1 & 4)
 1. Literally Homeless
 4. Fleeing/attempting to flee Domestic Violence (Only living in Safe Home, Shelter, or Place not meant for Human Habitation)

AND

- Resources: Household MUST have no other existing housing options, financial resources, or other support networks identified to avoid entering or prevent leaving shelter. (Clients that are deemed eligible under RRH/RA can retain \$1,000 in cash assets and one vehicle per adult household member (not to exceed more than two vehicles total per household).
- Sustainability: Clients must be likely to sustain housing once assistance ends. There is no minimum income requirement to enter the program and clients may receive longer periods of assistance (up to 24 months) to help build stability and independence.
- Intensive Case Management: No household can receive (or continue to receive) any assistance related to RRH/RA funds unless they have been assessed by an RRH/RA case manager and are receiving intensive case management (minimum of 2 visits a month, with at least one each month in the household's residence once housed).
- Housing Stabilization Plan: No household can receive (or continue to receive) any assistance related to RRH/RA funds unless they have created (and are abiding by) a Housing Stabilization Plan with their RRH/RA case manager or other authorized representative.
- Financial Counseling: The CHF suggests that households receiving state rental assistance and/or Rapid Rehousing receive Financial Counseling to ensure long-term success in their supported units.

If all criteria are met, then the following financial assistance is available:

Financial Assistance: Limited to short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, and moving cost assistance.

- Short-term rental assistance (3 months)

- Medium-term rental assistance (4 to 24 months)
- Security deposits

Reasonable moving cost assistance (CHF providers should consult with their CHF program representative to ensure that this requirement is met).

- Staffing and operating costs associated with implementing eligible financial assistance activities

Monthly rental assistance maximum will be based on that fiscal year's fair market rent, as measured by HUD. A clause about rent reasonableness also exists: Rent Reasonableness: Agencies MUST ensure that State Rental Assistance/RRH funds used for rental assistance do not exceed the actual rental cost, which must be in compliance with HUD's standard of "rent reasonableness." "Rent reasonableness" means that the total rent charged, including utilities, for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units.

91.320(k)(3)(ii) For each area of the State in which a Continuum of Care has established a centralized or coordinated assessment system that meets HUD requirements, the State must describe that centralized or coordinated assessment system. The requirements for using a centralized or coordinated assessment system, including the exception for victim service providers, are set forth under 24 CFR 576.400(d).

In instances in which the household is unable to be diverted, a household will receive the standard housing assessment. The standardized assessment score, case conference information, Housing Priorities, and client choice will be the means used by the Coordinating Entity to determine the order in which households are referred for supportive housing programs. In accordance with policy, the CES may break standardized assessment scoring ties, adjust model eligibility, and/or placement order on the Statewide Priority List using all available case information. To ensure that vacancies are promptly filled, the Statewide Coordinated Entry System, may issue multiple referrals to one vacancy; however, the Statewide Coordinated Entry Manager must indicate the order of priority to the referring partner so that vacancy is filled with the most vulnerable eligible applicant. A referral will be issued to the Regional Assessment Entity, Primary Worker, and Receiving Program and should be retained in the Receiving Programs files to document compliance with CES. The referral decision is not the complete housing application. The referral decision will include at a minimum:

- referral date;
- household's initials, HMIS number and other identifying information if necessary;
- Regional Assessment Entity contact information;
- Primary Worker contact information;
- contact information for the project to which the household was referred;

- a brief description of the next steps the household should take; and,
- instructions for appealing the decision, including the contact information for the person to whom and timeframe under which the appeal should be submitted.

The Regional Assessment Entity and any other service provider may not refer a household to COC, CHF and ESG funded housing projects without a Referral Decision from the Statewide Coordinated Entry Manager indicating eligibility and referral to that project. COC, CHF and ESG Permanent Supportive Housing and COC, CHF and ESG Rapid Re-Housing may not admit any household except those that have been found eligible and referred by the Statewide Coordinated Entry Manager.

A complete description is contained in the detailed Policies and Procedures for the Statewide Coordinated Entry System. Available here: [Homepage | RI Continuum of Care](#)

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed - Zero
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan - Zero
3. The amount of surplus funds from urban renewal settlements - Zero
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan - Zero
5. The amount of income from float-funded activities - Zero

Total Program Income - Zero

Other CDBG Requirements

1. The amount of urgent need activities – Zero
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income – Minimum of Seventy Percent (70%)

Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. – This Annual Action Plan is part of the three-year overall benefit period of 2022, 2023, 2024.

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.320(k)(2)

1. **A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

HOME funds will not be used for purposes beyond those identified in Section 92.205.

2. **A description of the guidelines that will be used for resale of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

The Rhode Island HOME Resale Provision is added at the end of this section.

3. **A description of the guidelines for resale that ensures the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4) are as follows:**

The Rhode Island HOME Resale Provision is added at the end of this section.

4. **Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

HOME funds will not be used for this purpose.

RI Housing
HOME Investments Partnership Program
Resale Policy

Introduction

The State of Rhode Island utilizes HOME Program funds for new construction and rehabilitation of homeownership housing, as projects arise. When HOME Program funds assist homeownership housing, the State uses a resale provision to comply with 24 CFR 92.254(a)(5)(i), which requires that the State:

- a. must ensure, if the housing does not continue to be the principal residence of the family for the duration of the period of affordability that the housing is made available for subsequent purchase only to a buyer whose family qualifies as a low-income family and will use the property as the family's principal residence.
- b. must also ensure that the price at resale provides the original HOME-assisted owner a fair return on investment (including the homeowner's investment and any capital improvement)
- c. and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers; affordable is defined by the State as limiting the Principal, Interest, Taxes and Insurance (PITI) amount to no more than 30% of the gross monthly income for a household earning 80% of Area Median Income (as defined by HUD).

The State projects the use of HOME funds for the development of HOME-assisted homeownership opportunities and has also reserved funds for homebuyer assistance for eligible buyers, subject to relevant subsidy limits on the HOME unit they are purchasing. Homebuyer assistance may include, but is not limited to, down payment assistance to the buyer; mortgage interest write-down; second mortgage assistance; and write down value of the property.

Part I

Qualifying the New Buyer

All HOME-assisted units must be sold only to a buyer whose family qualifies as a low-income family earning up to 80 percent of the Area Median Income (AMI), as published by the U.S. Department of Housing and Urban Development annually, for the duration of the HOME Period of Affordability. However, the applicable AMI may be set at a level below 80%, and in such cases, the new buyer must qualify per the level indicated in the respective legal documents. Income qualification and documentation must occur as prescribed in 24 CFR 92.203 (see Attachment for checklist of required documents), and all buyer income and demographic information and documentation must be submitted to the HOME Program Staff in Rhode Island Housing's Development Division for approval prior to the transfer of the property. The initial purchaser, and all subsequent buyers of a HOME-assisted unit, must use the property as his/her/their principal residence during the HOME Period of Affordability. The State conducts annual monitoring to ensure this requirement is met.

HOME Period of Affordability	
HOME Investment	Length of the Affordability Period
Less than \$25,000	5 years
\$25,000 - \$50,000	10 years
More than \$50,000	15 years

Part II

a. Fair Return on Investment and Resale Price

Per 24 CFR 92.254(a)(5)(i), the HOME resale provision must ensure that the price at resale provides the owner a fair return on his or her investment on the HOME-assisted property. However, CPD Notice 12-003 (Subject: Guidance on Resale and Recapture Provision Requirements under the HOME Program) states that “in certain circumstances, such as a declining housing market where home values are depreciating, the original homebuyer may not receive a return on his or her investment because the home sold for less or the same price as the original purchase price”.

While Rhode Island’s provision includes a formula on what constitutes a fair return on investment, it is important to note that this provision does not guarantee a return to the homeowner.

“Fair Return on Investment” shall be equal to the change in Area Median Income over the original homebuyer’s period of ownership to the time of resale (Fair Return Rate for Investment) times the homebuyer’s original investment (Investment), plus the change in Area Median Income between the time the improvement was completed to the time of resale (Fair Return Rate for Improvement) times the value of the documented cost of unsubsidized capital improvements (Improvements). Multiple Improvements can be included, and for each eligible Improvement, a specific Fair Return Rate for Improvement will be calculated.

The “Rate(s)” will be calculated as a fraction, the numerator of which is 80 percent (80%) of the AMI for a family of four as published by HUD as of the date of receipt of the owner’s notice to sell the affordable unit and the denominator of which is 80 percent (80%) of the AMI for a family of four as published by HUD as of the date of the initial closing (for any original investment) or as of the date of the completed improvements (all that are applicable). All calculations shall be performed by RI Housing.

Homeowner’s original investments shall include any down payment made from the homeowner’s own funds applied to the purchase price of the property.

“Capital Improvements” are elements that may add to the value of the unit or prolong its useful life, are of function and quality consistent with comparable affordable housing units and are owned solely by the owner (not part of any common areas). Maintenance is not considered a capital improvement. Improvements that are funded by federal, state, or local grant programs are not eligible. Some examples of capital improvements include the replacement of non-operational heating or hot water systems, installation of energy-efficient windows, adding insulation to the home, additions such as a bedroom, bathroom or garage, accessibility improvements such as bathroom modifications or wheelchair ramps, and outdoor improvements such as a paved driveway, retaining wall or fence. The value of the capital improvement for the fair return on investment formula will be the actual costs of the improvements as documented by the homeowner’s receipts. Determination of eligible capital improvements to be included in the fair return on investment formula will be at the discretion of RIHousing.

Where applicable, all improvements must have been installed and inspected in compliance with building code standards. All improvements and costs must be documented to the satisfaction of Rhode Island Housing and may be subject to onsite verification by RIHousing.

An example of the fair return on investment formula is included in the Attachment to this Resale Provision. The Attachment also describes the various actions that the State will take upon resale, relating to the resale price, equity from the sale of the home, and the fair return on investment formula values. **In all instances, the original owner will retain all equity upon resale to a qualified buyer.**

b. Resale Price

Where possible, the resale price should reflect the fair market value of the home. The State will consider the appraised value of a home as the Resale Price, if that appraisal is no older than six months as of the State’s receipt of the owner’s notice of intention to sell. The cost of the appraisal is the responsibility of the owner intending to sell.

The State will inform the seller of the approved Resale Price in a timely manner, generally no more than five (5) business days after the receipt of the owner’s intention to sell, or after receipt of the appraisal that the owner has commissioned, whichever is later.

The Resale Price, once determined by the State, is valid for six months after the communication of the Price to the owner. After six months, the Resale Price will be continued or updated per review by the State, with the results of that review being communicated to the owner in a timely manner.

It is important to note that this policy does not guarantee a return to the homeowner. Under certain market circumstances the owner may not be able to receive a full return on his or her investment.

Part III

Continued Affordability

The State is obligated to ensure that the owners of HOME-assisted units receive a Fair Return on Investment and that the unit(s) remain affordable to a range of income eligible households upon resale. To maintain continued affordability, the State will target subsequent purchase to households earning 70- 80% of the Area Median Income, spending no more than 30 percent (30%) of gross household income on fixed housing costs (principal, interest, property taxes, condominium fees, if applicable, and insurance), assuming current interest rates offered for a 30-year, fixed rate loan and a down payment of 3.5%. Rhode Island Housing maintains a purchase price calculator (<https://www.rihousing.com/sp.cfm?pageid=571>) that will be used to determine the home's affordability to households earning between 70-80% AMI.

If the Resale Price (as determined in Part II, Section b) of the home exceeds the maximum affordable sales price indicated by the purchase price calculator (described in this Part), to provide a fair return to the original buyer while ensuring that the property is affordable to households earning between 70-80% of AMI, additional assistance will be provided to the subsequent homebuyer. Assistance may include but is not limited to: down payment assistance to the buyer; mortgage interest write-down; second mortgage assistance; and write down value of the property.

Part IV

a. Disclosure of Resale Provisions

The HOME Resale Policy is provided to the homebuyer through the execution of legal documents, which at minimum will specify:

- i. The length of the Period of Affordability;
- ii. That the home must be the Buyer's principal residence throughout the Period of Affordability;
- iii. That the Owner must contact Rhode Island Housing in writing if intending to sell the home prior to the end of the Period of Affordability or in the case of foreclosure, transfer in lieu of foreclosure, or assignment of an FHA insured mortgage to HUD; and
- iv. The basis for calculating the maximum resale price and fair return as described above.

Any subsequent buyer within the Period of Affordability specified in the legal documents will be subject to all remaining requirements.

b. Enforcement of Non-Compliance

If, at some point, the housing is no longer the principal residence of the homeowner during the Period of Affordability, and the housing has not been sold to another income-eligible party, RIHousing will attempt to bring the unit into compliance and enforce the terms outlined in the HOME legal documents. If the HOME-assisted homeowner fails to remedy noncompliance issues, the homeowner will be required to make full repayment of the HOME-assistance. Repayment of the HOME-assistance will release the property from the HOME affordability restriction.

c. Foreclosure, Transfer in Lieu of Foreclosure, or Assignment

In HOME-assisted homebuyer projects, the affordability restrictions imposed may be suspended upon foreclosure, transfer in lieu of foreclosure, or assignment of an FHA mortgage to HUD. The Period of Affordability will be reinstated if, during the original Period of Affordability, the owner of record prior to the termination event, obtains an ownership interest in the housing. To preserve affordability, RIHousing will attempt to prevent foreclosure or utilize its rights to identify an eligible buyer to purchase the housing and assume the existing HOME responsibilities. Affordability must be preserved by a subsequent purchase at a reasonable price by a qualified low-income homebuyer who will use the property as their principal residence and who agrees to the remainder of the Period of Affordability. If this does not occur, repayment of the entire HOME investment by RIHousing is required.

d. Subordination

RIHousing will only allow subordination of the recorded HOME documents to proposed senior debt refinancing for a better rate and term.

The Owner should contact the RIHousing HOME staff to notify them of their desire to subordinate the original recorded HOME legal documents. In the event of subordination, the Period of Affordability will continue through the full term, as outlined in legal documents.

RIHousing will consider exceptions to this policy on a case-by-case basis based on circumstances of family hardship and the need to permit refinancing to prevent the loss of the unit(s).

Explanations of Resale Scenarios and Examples

Example of Calculating Fair Return on Investment

A HOME-assisted homeownership property in Cumberland, RI is sold to an income-qualified buyer in October of 2013. This owner included a down payment of \$6,000 of their own funds. Further, the owner incurred verified and approved capital improvement expenses of \$5,000 in 2015. The original buyer sent notice to the State in October of 2017 of their intent to sell the affordable unit.

<u>INVESTMENT</u> : The owner used \$6,000 of their own funds as a down payment to purchase the home.	INVESTMENT: \$6,000
<u>IMPROVEMENTS</u> : The owner incurred \$5,000 in approved capital improvements over the course of owning the home.	IMPROVEMENTS: \$5,000
<u>FAIR RETURN RATE OF INVESTMENT</u> : The 80% AMI for a family of four in 2013 as provided by HUD was \$57,500 while for 2017 it was \$57,700. The “Rate” for the down payment is therefore calculated with \$57,700 as the numerator and \$57,500 as the denominator, or $\$57,700 / \$57,500$, which in this example is equal to 1.0035.	RATE FOR RETURN ON INVESTMENT: $\$57,700 / \$57,500 = 1.0035$
<u>FAIR RETURN RATE OF IMPROVEMENT</u> : The 80% AMI for a family of four in 2015 as provided by HUD was \$57,600 while for 2017 it was \$57,700. The “Rate” for the down payment is therefore calculated with \$57,700 as the numerator and \$57,600 as the denominator, or $\$57,700 / \$57,600$, which in this example is equal to 1.0017.	RATE FOR RETURN ON IMPROVEMENT: $\$57,700 / \$57,600 = 1.0017$
<u>FAIR RETURN ON INVESTMENT FORMULA</u> : (Rate 1 [1.0035] X Investment [\$6,000]) + (Rate 2 [1.0017] X Improvements [\$5,000]) = Total Return to the Original Homebuyer at Sale [\$11,029.50].	FAIR RETURN ON INVESTMENT: $1.0035 \times \$6,000 = \$6,021$ + $1.0017 \times \$5,000 = \$5,008.50$ <hr/> \$11,029.50 (rounded to \$11,030)

Various Equity Scenarios, Explanations

Scenario 1 – Equity from sale of home exceed total return to original homebuyer as per the fair return on investment formula

In accordance with the HOME regulations, the State is obligated to ensure that the owners of a HOME-assisted units receive a Fair Return on Investment. However, in some cases, equity from a sale of a HOME-assisted unit yields returns above and beyond the fair return on investment formula. Equity from the sale of a HOME-assisted unit is determined by total proceeds at sale minus repayment of senior debt and sale-related closings costs. In a scenario in which the equity from the sale exceeds the fair return on investment obligated to the homeowner, the owner will nonetheless retain the entirety of the equity. For example, if the equity of a HOME-assisted unit is \$20,000, and the fair return on investment calculation yields \$11,030 (like in the example) the owner would retain the fair return on investment (\$11,030) as well as the equity above and beyond the fair return (\$8,970 above and beyond), otherwise described as receiving the total equity of \$20,000.

Scenario 2 – Resale of home yields Equity below the fair return on investment

While the State is obligated to ensure that the owner of a HOME-assisted unit receives a Fair Return on Investment where there are positive returns on the sale, there are scenarios in which a depressed or declining market exists and a loss on investment can occur. If the Equity of the sale (total proceeds from sale at resale price minus loan repayment of senior debt and sale-related closing costs) do not exceed the fair return on investment calculation, the owner in this scenario would not receive a full return. The owner will still retain Equity, if any. For example, if the Equity of the sale of a HOME-assisted unit are \$5,000, and the fair return on investment calculation yields \$11,030 (as in the example in Scenario 1), the owner would retain the full Equity of \$5,000 but would not attain the full value of their investment and fair return.

Scenario 3 – Resale of home yields no Equity

While the State is obligated to ensure that the owner of a HOME-assisted unit receives a Fair Return on Investment where there are positive returns on the sale, there are scenarios in which a depressed or declining market yields no Equity. In this case, the owner receives no Equity and will recoup none of its investments, improvements, or fair return. For example, if a home sells for less than what is still owed on loan repayment and sale-related closing costs, then there are no Equity and therefore the original homeowner will not receive the Total Return to the Original Homebuyer at Sale amount as described in the example earlier in this attachment.

Scenario in which Resale Price is above what is affordable to low-income homebuyers

In accordance with the HOME regulations, the State is obligated to ensure that the owners of a HOME-assisted units receive a Fair Return on Investment and that the unit remains affordable to a range of income eligible households upon resale. To maintain continued affordability, the State will target subsequent purchase to appropriately-sized households earning 70- 80% of the area median income, spending no more than 30 percent (30%) the gross household income for an 80% AMI family (level determined annually by HUD) on fixed housing costs (principal, interest, property

taxes, condominium fees, if applicable, and insurance), assuming current interest rates offered for a 30-year, fixed rate loan and a down payment of 3.5%. For example, an owner in Burrillville sells his or her home at the RIHousing-approved resale price for \$198,000. However, a household at 80% AMI for this area would have to pay no more than \$196,000 to afford to purchase this home (this determination would be made by RIHousing using the mortgage and AMI inputs described above). In such a situation, the State will subsidize the new buyer. This subsidy would come in a form described in Part III of this Resale Policy. In no circumstance does the ability of a low-income buyer to afford a home affect the resale price or the fair return on investment obligated to the seller.

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