

Rhode Island Consolidated Annual Performance and Evaluation Report

For Program Year 2019
(July 1, 2019 thru June 30, 2020)

Draft

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December 7, 2020

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CR-05 - Goals and Outcomes

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

Program Year 2019 is the final year covered in the 2015-2019 Consolidated Plan. Rhode Island continued strong progress toward many of the goals set out in the Consolidated Plan and the 2019 Annual Action plan. Development and preservation of affordable units continued at a faster pace than anticipated and the state was able to continue using Hardest Hit funding to address lingering impacts of the financial crisis of a decade ago.

Rhode Island was awarded \$7,841,160 under a new High Impact Neighborhoods Demonstration grant for lead hazard remediation in several zip codes in Pawtucket and Central Falls and did much of the groundwork to begin administering this new lead program in the next program year. While the number of healthy homes projects completed declined in PY19, the work associated with the new grant is expected to more than compensate for this decline in the next year and years after.

Like the rest of the country and the world, Rhode Island had to redirect many of its efforts in response to the COVID-19 crisis. Though many of the housing-oriented programs did not come online until the beginning of PY2020, the last portion of PY 19 saw significant planning of the state's response to the housing impacts of the pandemic. These included a statewide eviction moratorium, housing payment assistance, and significantly increased housing for those experiencing homelessness.

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

The goal of Addressing Negative Impacts of the Foreclosure Crisis had largely been accomplished by the beginning of PY19. Annual goals were relatively low, and funding from the Hardest Hit program allowed direct assistance to homebuyers in affected areas to continue. At least partially due to the success of efforts to combat the foreclosure crisis, the homeownership market is largely recovered in Rhode Island and goals for assisting buyers in hardest hit areas achieved 136% of the number of buyers targeted for assistance in PY19.

Rhode Island was able to develop and preserve a significant amount of affordable housing in PY19. Nearly all of these units were at least partially funded through the LIHTC program, but HOME, HTF, and other sources of ancillary financing played important roles. Overall 668 housing units were developed or preserved, which is 125% of the goals set out in the Annual Action Plan.

The total number of households served in pursuit of the goal to improve the health, safety and efficiency of all homes did not meet the PY19 targets. This is in large part due to the COVID-19 pandemic and the implementation of a new system to administer financing for lead

remediation as a part of the High Impact Neighborhoods Demonstration grant for lead hazard remediation. The COVID-19 crisis limited the ability of program staff to complete work including inspections, as well as limited the willingness of potential participants to authorize inspections and work. It is expected that the number of households assisted in the next program year and those following will make up for the lower numbers in PY19.

Infrastructure projects not specifically targeted to low mod households exceeded expectations in the program year, which led to the state exceeding the goal set for number of households served by non-housing community development projects.

Results of efforts to prevent and end homelessness were mixed. The goal set for rapid rehousing was exceeded by over 100% and perhaps as a result fewer people were assisted with overnight shelter beds. This speaks to the success of the state’s coordinated entry system, which was fully implemented in PY19.

The state did not achieve its tenant-based rental assistance goal. The HCVP program still struggles with a low utilization rate, due at least partially to jurisdictional issues. Additionally, Rhode Island has a low rental vacancy rate, which impedes lease up, and voucher holders experience source of income discrimination. Even so, the state achieved about 90% of its tenant-based assistance goals.

Goal	Indicator	Unit of Measure	Expected – Program Year	Actual – Program Year	Percent Complete
Address Negative Impacts of Foreclosure Crisis	Rental units rehabilitated	Household Housing Unit	0	0	0.00%
Address Negative Impacts of Foreclosure Crisis	Homeowner Housing Added	Household Housing Unit	0	0	0.00%
Address Negative Impacts of Foreclosure Crisis	Direct Financial Assistance to Homebuyers	Households Assisted	50	68	136.00%
Address Negative Impacts of Foreclosure Crisis	Other	Other		28	
Develop and Preserve Affordable Housing	Rental units constructed	Household Housing Unit	42	180	428%
Develop and Preserve Affordable Housing	Rental units rehabilitated	Household Housing Unit	463	466	101%

Goal	Indicator	Unit of Measure	Expected – Program Year	Actual – Program Year	Percent Complete
Develop and Preserve Affordable Housing	Homeowner Housing Added	Household Housing Unit	7	3	42.8%
Develop and Preserve Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	3	0	0.00%
Develop and Preserve Affordable Housing	Housing for Homeless added	Household Housing Unit	21	19	90.5%
Improve health, safety and efficiency of all homes	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted			
Improve health, safety and efficiency of all homes	Rental units rehabilitated	Household Housing Unit	98	34	34.7%
Improve health, safety and efficiency of all homes	Homeowner Housing Rehabilitated	Household Housing Unit	211	35	16.6%
Improve health, safety and efficiency of all homes	Other	Other	115	0	0.00%
Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,000	19,470	129.8%
Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	750	664	88.5%
Non-Housing Community Development	Businesses assisted	Businesses Assisted	3	17	567%
Prevent and End Homelessness	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	250	511	204%
Prevent and End Homelessness	Homeless Person Overnight Shelter	Persons Assisted	3000	2226	74.2%

Goal	Indicator	Unit of Measure	Expected – Program Year	Actual – Program Year	Percent Complete
Prevent and End Homelessness	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	24	128	533.3%
Prevent and End Homelessness	Homelessness Prevention	Persons Assisted	6	0	0.00%
Prevent and End Homelessness	Housing for Homeless added	Household Housing Unit	0	12	
Prevent and End Homelessness	HIV/AIDS Housing Operations	Household Housing Unit	50	0	0.00%
Prevent and End Homelessness	Other	Other	1354	609	45.0%
Provide Tenant-Based Rental Assistance	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1700	1520	89.41%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

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

CDBG funds for non-housing community development are distributed to units of general local government (UGLGs) to use to develop much-needed public facilities and infrastructure. Priority needs 8 and 9 (Table 74 of the 2015-2019 Consolidated Plan) are directly addressed by the distribution of these funds.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME	ESG	HTF
White	413	16	43	0
Black or African American	30	12	17	0
Asian	3	0	0	0
American Indian or American Native	2	0	21	0
Native Hawaiian or Other Pacific Islander	1	0	0	0
Total	459	28	81	0
Hispanic	18	5	27	0
Not Hispanic	459	0	33	0

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

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

In PY 2019, construction was completed on 47 HTF-assisted units. They are fully occupied. Beneficiary data was not completed in IDIS prior to July 1, 2020. These units will be included in the PY 2020 CAPER. 83 HTF-assisted units are currently under construction. An additional 19 have received preliminary commitments.

Homeownership and Mortgage Services

During PY 2019, RIHousing and its partners originated mortgages for 1769 low and moderate-income Rhode Island households totaling \$415,606,466 to purchase homes. An additional \$14,966,654 helped 1,708 of these households with second mortgages. RIHousing maintained its percentage of new first mortgages to minority borrowers, with 49.6% of first time homebuyers being either from racial or ethnic minorities.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	7,414,189	\$2,572,299
HOME	public - federal	8,065,887	\$1,714,113
ESG	public - federal	699,115	611,612
HTF	public - federal	6,000,000	\$3,630,814.4
Continuum of Care	public - federal	7,160,233	\$5,279,227
Housing Trust Fund	public - federal	0	See HTF above
LIHTC	public - federal	4,366,875	\$6,601,278
Section 811	public - federal	783,996	\$1,405,334
Other	private	0	0
Other	public - federal	2,891,714	2,891,714
Other	public - state	7,385,260	7,385,260

Table 3 - Resources Made Available

Narrative

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

Identify the geographic distribution and location of investments

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

Table 4 – Identify the geographic distribution and location of investments

Narrative

There are no target areas defined in the state's Consolidated Plan besides overall statewide efforts. The geographic allocation of investments are reflections of the various program regulations, as defined in the state's Strategic Plan, specifically section SP-10. In general, HOME, CDBG and ESG funds prioritize investments that will assist those geographic regions that do not have access to entitlement funding for the same program, respectively. However, state CPD formula allocation funds may be used in entitlement communities if there is funding left over after non-entitlement awards are made and if a particular project addresses a high need priority or geographic area. LIHTC funds are awarded based on the dual geographic goals of developing affordable housing in parts of the state with few opportunities for low-income households and addressing concentrated vacancy and blight in urban areas that was CAPER 9 caused by the housing crisis. State ESG funding assisted organizations to address homelessness

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

Leveraging

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

ESG

Due to the unique collaboration of the Consolidated Homeless Fund, the CHF Partnership is able to provide 100% matching funds without transferring match responsibility to the ESG sub-recipients. Non-CPD funds that are leveraged through ESG funding of the CHF include the state's homelessness funding through the HRC.

In PY19, the state's ESG formula allocation made up 10.7% of the funding for the Consolidated Homeless Fund, the remaining funding coming from a portion of the state's Title XX Social Services Block Grant, entitlement community formula allocations of ESG funds, as well as state investments through a restricted receipt account (the real estate conveyance tax). As shown in CR-75, ESG Expenditures, Consolidated Homeless Fund activities paid for with the State ESG funds leveraged a total of \$643,543 in state funding in FY18, which represents an increase of 9.7% in the amount leveraged compared to the previous government fiscal year.

HOME

HOME applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. PY 19 match was achieved using cash equivalents from non-federal sources and state bond programs.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$85,046,933.12
2. Match contributed during current Federal fiscal year	\$1,980,712.55
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$87,027,645.67
4. Match liability for current Federal fiscal year	\$357,183.87
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$86,670,461.80

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
5523		\$640,885.00					\$339,827.55	\$980,712.55
5450		\$500,000.00						\$500,000.00
5452		\$500,000.00						\$500,000.00
								\$1,980,712.55

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
\$895,109.14	\$104,248.36	\$41,321.28	0	\$958,036.22

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	4					4
Dollar Amount	\$21,837,370.54					\$21,837,370.54
Sub-Contracts						
Number	66	0	0	3	13	50
Dollar Amount	\$14,782,934.00			\$855,294	\$3,277,254	\$10,650,386
	Total	Women Business Enterprises	Male			
Contracts						
Number	4	0	4			
Dollar Amount	\$21,387,370.54		\$21,387,370.54			
Sub-Contracts						
Number	66	9	57			
Dollar Amount	\$14,732,889.00	\$3,450,241	\$11,282,648			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Dollar Amount	0					

Table 9 – Minority Owners of Rental Property

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

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	1,425	1,214
Number of Non-Homeless households to be provided affordable housing units	2,215	2,403
Number of Special-Needs households to be provided affordable housing units	0	60
Total	3,640	3677

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	3,104	2196
Number of households supported through The Production of New Units	70	180
Number of households supported through Rehab of Existing Units	466	468
Number of households supported through Acquisition of Existing Units	0	0
Total	3,640	2,844

Table 12 – Number of Households Supported

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

One of the reasons for this program year's exceeding of the one-year goals was due to the fact that the one-year goals set for PY18 were lower than previous years' one year goals. Further, the greater allocation of additional subsidies to leverage CPD funds resulted in more overall support for unit production and preservation.

The state continues to struggle with a low voucher utilization rate. . Additionally, Rhode Island has a low rental vacancy rate, which impedes lease up, and voucher holders experience source of income discrimination. Shared jurisdiction between PHAs in the state continues to be explored as a potential solution.

Discuss how these outcomes will impact future annual action plans.

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

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

Number of Households Served	CDBG Actual	HOME Actual	HTF Actual
Extremely Low-income	393	16	0
Low-income	93	5	0
Moderate-income	14	12	0
Total	500	33	0

Table 13 – Number of Households Served

Narrative Information

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

In PY 2019, construction was completed on 47 HTF-assisted units. They are fully occupied. Beneficiary data was not completed in IDIS prior to July 1, 2020. These units will be included in the PY 2020 CAPER. 83 HTF-assisted units are currently under construction. An additional 19 have received preliminary commitments.

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

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

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

The Rhode Island Continuum of Care has a strong outreach system. The State Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) has used Projects for Assistance in Transition from Homelessness (PATH) funds to ensure that outreach teams exist throughout the state to connect homeless individuals and families with housing and services that they require. Over the last two and a half years, the continuum has implemented a statewide coordinated entry system to match people experiencing homelessness with the resources needed to resolve their housing crisis as quickly as possible. This includes various diversion and shelter assessments and a vulnerability index. Once assessed, those needing permanent supportive housing are referred to available subsidy and units. If a resource is not found, the Coordinated Entry system assures their continued access to services and supports as they come available. Persons are prioritized for housing based on their severity of need and length of time homeless. CAP agencies and service agencies also are aware of the assessment processes. All vacancies (CoC, RIHousing-funded, State-funded) are reported to the Coordinated system. RI CoC policies requires providers of permanent supportive housing to implement a low barrier approach to entering programs and receiving assistance. The Consolidated Homeless Fund awards funding to eligible projects for street outreach, which provides essential services to unsheltered homeless persons connecting them with emergency shelter, housing or critical services. The eligible costs and requirements for essential services consist of engagement, case management, emergency health and mental health services, transportation and services for special populations. CHF funds are used for these services to the extent that other appropriate funding sources for these services are inaccessible or unavailable within the community.

Addressing the emergency shelter and transitional housing needs of homeless persons

In PY19, the State's homelessness programming, as measured through the State Homeless Management Information Systems database, served 2,226 persons with emergency shelter and 162 persons with transitional housing. The Consolidated Homeless Fund and the Continuum of Care combine to fund 232 transitional housing units per year, with 78% of these homes being available to households with children. Transitional housing is intended to be a stepping stone for a household while they are securing their own homes. A case manager works with the household in transition to develop a case plan that has realistic outcomes recognizes the strengths of the household and address barriers to independent living and develops action steps to make that transition. Case managers work with members of the household to attend financial, literacy and other life-skills workshops that are available in the immediate area. Services available include referrals to community healthcare resources and assistance with obtaining health insurance. Some units of transitional housing include nurses and psychiatrists to address client

needs for psychotropic medications and to monitor their health status. Applicants for funding to operate transitional housing include measurements of outcomes related to successfully transitioning clients to permanent housing, usually as percentages of clients that achieve increased income, secure permanent housing or achieve goals as part of their individual service plans. The State and entitlement city ESG funds awards are coordinated to ensure all parts of the state can meet the emergency shelter, Rapid Rehousing and Street outreach needs of all persons. Domestic Violence Shelter placements are available throughout the state. Rhode Island is committed to decreasing the length of stay in these facilities by expanding its rapid re-housing programs through CoC and State Rental Assistance dollars. No new transitional housing programs are currently being developed, with rapid re-housing replacing that program model. There is also a decreased use of hotel/motel vouchers, which are utilized predominantly during extreme weather situations.

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

Foster Care The Rhode Island Department of Children, Youth and Families (DCYF) has a policy not to discharge clients into homelessness, and has committed to this policy through a Memorandum of Agreement with 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 voluntarily participating in the DCYF-funded YESS (Young Adults Establishing Self Sufficiency) Aftercare Services which provides a stipend for housing and other wrap-around supports until the youth is 21.

YESS provides individualized, youth-driven services and supports to young adults, ages 18-21, who have been closed to the state's Family Court and DCYF.

Health Care

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

Governor Raimondo's Reinventing Medicaid Initiative has illuminated the need to invest in the social determinants of health to achieve the goals of improving quality and patient satisfaction while controlling spending. Through initiatives such as the expansion of the Community Health Team model to the Accountable Entity and the launch of the Housing Stabilization service there is a commitment to aligning healthcare resources with housing success.

Mental Health

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

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

The Division of Behavioral Health's primary effort in provision of services to the homeless is through its grant for Projects for Assistance in Transition from Homelessness (PATH). The grant, for \$300,000, targets people who are suffering from serious mental illness and substance abuse and who are homeless or at risk of becoming homeless.

PATH funded services consist primarily of outreach, engagement, screening and diagnosis. The fact that PATH services are provided through House of Hope CDC, a statewide community development corporation gives PATH clients access to a wide range of other services, including mental health and substance use treatment, case management, supportive and supervisory services in residential settings and referrals to health services, job training, and education while providing priority access to permanent supported housing services for its PATH clients.

Corrections

Developing coordinated reentry strategies, including 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.

The community benefits from reentry programs that work. Public safety improves and correctional and criminal justice costs are reduced in the long run when ex-inmates are directed away from re-offending to more productive work.

RI has initiated a comprehensive approach to 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. The committee includes key state agencies and is divided into three tiers. The first tier, comprised mainly of cabinet-level appointees, focuses on larger policy issues. The second tier, consisting of departmental appointees and directors of community based organizations, examines management issues. The third

tier, comprised of front-line worker and managers, addresses programmatic issues.

Additionally, community reentry councils, a group of community leaders and service providers, have been established in Providence, Pawtucket, Newport and Warwick to help assist offenders returning to their community.

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

Chronically homeless individuals and families have been a priority for placement into permanent supportive housing in Rhode Island for the past 4 years. This commitment has been supported by the institutionalization of the VI-SPDAT, which prioritizes housing for the the most vulnerable people experiencing homelessness. The coordinated entry system was implemented with this tool, and it is managed through RI's HMIS, which are parts of the RI Continuum of Care structure. Rhode Island also received a HUD Section 811 rental assistance award for 150 units. These units serve chronically homeless and homeless in institutions. RIHousing, the Money Follows the Person (EOHHS) office and BHDDH have entered into memorandums of understanding to ensure services are available and that those who are high utilizers of Medicaid are served first. (See goals in AP-60 of the Consolidated Plan).

The CoC provided technical assistance to the TSH providers to help transition their projects into PSH programs where appropriate or help find other resources to maintain that housing, while also re-allocating other resources to tenantbased rental assistance to further increase the opportunities for persons to avoid homelessness.

RI's Statewide Coordinated Entry system utilizes a list from HMIS on families and individuals ranked by longest to shortest length of stay and acuity, and other prioritization criteria defined by the RICOC..

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

Actions taken to address the needs of public housing

RIHousing, as a public housing agency (PHA) servicing the communities without local PHAs, administered funding for approximately 1,700 tenant-based vouchers. Recent changes to HCVP include the HUD-approved set-aside for formerly homeless individuals to obtain a housing choice voucher through the Move-Up Initiative, systematic changes in program management that improves the success rate of lease up, and the on-going maintenance and expansion of a centralized waitlist for the State's PHAs.

2019 ACTION:

Foster Youth Initiative: RIHousing elected to participate in the Foster youth Initiative and have received approval from HUD to issue the first 10 of 25 housing choice vouchers to members of this vulnerable population.

- Move-Up Initiative: RIHousing has adopted a new local preference for families "moving up" from Permanent Supportive Housing to the HCV Program. The "move-up" preference was 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.
- Worked 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 17 agencies participating throughout the state. During PY2019, RIHousing recruited two additional PHAs to participate, bringing the total to 19. With the Centralized Waitlist Portal families will have the option of applying for assistance throughout the state through a one-time application process. RIHousing plans to make efforts to encourage the remaining Rhode Island housing authorities to join the system.
- Better utilized state and federal funds to provide residents with additional supports. Since the inception of the Housing Stabilization Specialist (HSS) program in Summer 2016 the HSS staff has conducted informational presentations and landlord appreciation events to owner groups throughout the state about the advantages of participating in the HCV Program and to strengthen existing partnerships. RIHousing has engaged a communications team and developed an incentive program to attract new landlords to participate in the program in the upcoming program year.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

RIHousing has served as Family Self Sufficiency (FSS) program coordinator for more than 20 years and currently has 147 participants actively enrolled in the program. Family Self Sufficiency (FSS) enables

individuals and families who receive assistance through the Housing Choice Voucher Program (HCVP) to learn the fundamentals of money management and achieve economic independence. In 2018, RIHousing had 27 families graduate from the program and disbursed over \$230,235, an increase of over \$65,000 from last program year, in Family Self Sufficiency (FSS) escrow funds.

Actions taken to provide assistance to troubled PHAs

Not Applicable

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

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

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

In 2019, the RI General Assembly passed legislation creating a Senate Housing Commission to look at barriers to housing development and how to address them. RIHousing is a member of the Commission. The Commission met twice in 2020, hearing from RIHousing and Dr. Edinaldo Tebaldi of the University of RI on housing market conditions, challenges to development and opportunities for legislative or policy solutions to address them. Governor Raimondo's FY21 budget proposal included a host of housing investments including a housing bond that was initially proposed at \$25 million but has since been increased to \$45 million, a dedicated funding stream for housing production and preservation funded with an increase to the real estate transfer tax, and incentives for municipalities to increase affordable housing by reimbursing for any increases to local education costs that might result from increased housing development. Unfortunately, as a result of the COVID-19 pandemic, work on both the Senate Housing Commission and the state budget was suspended in March, 2020. The General Assembly has announced that it will reconvene before the end of the year to pass the FY21 budget. The work of the Housing Commission is expected to resume when the General Assembly reconvenes in January.

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

The state identifies the following as underserved populations that will be the subject of targeted interventions to provide more housing opportunities and services that prevent homelessness. Successes regarding the actions outlined here will be described in each program year's CAPER.

Medicaid is increasingly becoming an important funding source for assisted housing services, and changes to Medicaid are encouraging better coordination among stakeholders. New five-year contracts were signed in April 2017 for three health plans to serve Rhode Island's 250,000 Medicaid members (representing close to one-quarter of the state's population). The three health plans – Tufts Health Plan, Neighborhood Health Plan of RI and UnitedHealthcare Community Plan – along with state agencies working with Medicaid members, continue to work on initiatives that support the goal of reducing healthcare costs through offering stable and secure housing.

Home Stabilization Initiative: Rhode Island's Dept. of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) has conducted several pilot programs since 2008 for vulnerable populations that have proven the cost effectiveness of providing permanent supportive housing to individuals who are cycling through emergency systems or have been unable to leave expensive institutions due to the lack of affordable housing and community-based support services that focus on housing retention. The

Home Stabilization amendment was accepted in 2015, and continued in PY19, EOHHS (The Executive Office of Health and Human Services) and BHDDH worked together to create certification standards in partnership with the Centers for Medicare and Medicaid Services (CMS). These standards allow for organizations to become providers of home stabilization services that can be billed to Medicaid.

The COVID-19 pandemic began to severely affect the state at the end of PY2019. Programs to address the needs of those affected by the pandemic were designed during this period, but not implemented until PY2020. Therefore, these programs will be described in the PY2020 CAPER. Strategies implemented include emergency housing for those experiencing homelessness, a statewide eviction moratorium, and several rental assistance programs.

Youth aging out of foster care

The R.I. Department of Children, Youth & Families (DCYF) is the principal agency charged with ensuring that youth aging out of foster care do not become homeless and that families are sustainably housed prior to reunification. A DCYF representative participates in the Family & Youth subcommittee of the Continuum of Care along with the Foster Forward and R.I. Kids Count. The subcommittee is responsible to to share successes, navigate barriers and indicate challenges existing for unaccompanied youth and families to meet the unique needs of the household, and to inform policy makers about policies which create barriers to successful placement.

DCYF provides voluntary extension of care (VEC) to young adults at age 18 who want continued help as they begin their adult lives. DCYF Community Services and Children's Behavioral Health staff and YDS staff identify potential participants by reviewing current youth in foster care at age 17. They make an initial determination if youth should be identified as Seriously Emotionally Disturbed/Intellectually Developmentally Disabled (SED/IDD) and in need of more intensive, longer term services through DCYF and/or the Department of Behavioral Health and Developmental Disabilities (BHDDH) or as youth who are not likely to achieve permanency before age 18. The YDS Administrator and YDS Supervisor then review these with the DCYF administrators responsible for each Region and Juvenile Justice to find agreement on those who the YDS Unit should reach out to for discussions about the VEC Program. YDS staff then follow up with the assigned DCYF direct service staff and the youth to arrange an initial meeting with the youth and others involved with the youth to discuss the program and determine how to proceed.

YESS (Youth Establishing Self-Sufficiency Aftercare Program) provides individualized, youth-driven services and supports to young adults, ages 18-21, who are no longer eligible for the state's Family Court and DCYF. RI Foster Parents Association, PCDC and Ferland Property Management all work to ensure that this housing answers the need for the target population.

Participants receive one-on-one advice and support from a self-sufficiency specialist, assistance locating safe and affordable housing, identifying employment, and/or enrolling in an educational program. They also receive guidance creating a tailored budget, and limited funds that help pay for housing and other living expenses (participants become increasingly responsible for their own housing expenses over time).

ASPIRE is a resource funded in part through the CYS contract that is available to any young person who experienced foster care on or after their 14th birthday, regardless of whether they aged out, were adopted, reunified with a biological parent, or moved to guardianship. ASPIRE helps young people impacted by foster care get on the path to financial independence. Through financial education and support in saving toward a purchase goal, the ASPIRE Initiative empowers youth-ages 14-26 to manage and save their money and become successful adults. ASPIRE participants receive:

- Nine hours of classroom-based, comprehensive financial education, tailored to the unique needs of young people in foster care
- \$100 toward the opening of an Individual Development Account (IDA), and a dollar-for-dollar match, up to \$1,000 per year, toward the purchase of such items as cars, education expenses, housing expenses, health expenses, and investments
- Additional financial education specific to transportation, housing, saving and investing, and education and training
- Access to financial coaching

De-institutionalized elderly and disabled

The State continued to coordinate across agencies to permanently and adequately house deinstitutionalized elderly and disabled.

Section 811 Project Rental Assistance: RIHousing was awarded \$5.6 million in 2015 to administer the Section 811 Project Rental Assistance Program for RI, a project that provides renewable project based rental assistance for five years to affordable housing projects that serve extremely low income persons with disabilities, and targets de-institutionalized elderly and disabled populations. RIHousing will – through facilitation with owners of units, award rental assistance contracts –BHDDH will provide case management services, transportation and employment services, support for independent living skills training, mental health services and making connections to Medicaid via these services to the eligible populations. Through June of 2020, RIHousing has approved 85 units under this program, housing 29 households, and is in the process of executing rental assistance contracts with additional developers in PY20. In total, the Section 811 program will serve 150 households, 50 of which will be dedicated to high users of Medicaid, 50 for those in institutions ready for discharge with no housing and 50 for those who cannot sustain their housing.

Accessory dwelling units: The State has successfully advocated for the statewide accommodation for the development of accessory dwelling units (in-law apartments), on the site of single family owner-occupied dwellings, for family members. Such a law prohibits municipalities from restricting in-law apartment development for this use. While the passage of these laws is an important step in allowing families to move their elderly or disabled family members to leave institutions into an affordable care setting, it is up to municipal officials (zoning boards of review, primarily) to recognize and implement these laws.

2019 Action

Under the requirements of the Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program (HEARTH Act), The Rhode Island Continuum of Care (“RICOC”) has implemented a Coordinated Entry System. Coordinated Entry is a powerful tool designed to ensure that households experiencing homelessness are matched, as quickly as possible, with the intervention that will most efficiently and effectively end their homelessness. Coordinated Entry is a data-driven concept which is widely accepted as a best practice in homeless assistance systems to achieve three goals:

1. Helping households move through the homeless system faster
2. Reducing new entries into homelessness
3. Improving data collection and quality

2019 Action – MFP

Money Follows the Person (MFP) Demonstration Program: In 2011, RI received a federal grant for MFP, designed to increase options for elderly and persons with disabilities to receive care in the community. MFP is part of the “rebalancing” efforts of the American Care Act to shift full-time institutional care to community-based settings. National and local findings of MFP efforts since 2011 emphasize how the lack of affordable, accessible housing is the biggest barrier to these rebalancing efforts, keeping too many persons in expensive, full-time institutional settings instead of at home receiving similar care. In response to this barrier, MFP created a housing working group that works to understand what organization and community services already exist for the elderly and disabled population. The working group includes long-term care representatives, home care nurses, Residential Service Coordinators (RSC), assisted living professionals and housing professionals.

The re-entry of discharged prisoners into community settings

Facilitating the re-entry for persons leaving prison is a goal of Opening Doors Rhode Island, and is thus a shared goal of this Consolidated Plan. Each subsequent year of this planning period, the state will provide updates on achievements relating to the provision of housing opportunities and the prevention or ending of homelessness for this population.

2019 Action

In 2019, The Rhode Island Department of Corrections continued its work of transitioning offenders, near their releases from prison, with necessary services. Discharge Planners created transition plans, and also managed 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.

Preventing homelessness

2018 Action

Recidivism Reduction from an Intensive Reentry Program with an Experimental Design – 9 Yards Program.

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 (TCP), 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 individuals who are eligible for parole and in need of services upon their release from the ACI. The Rhode Island Adult Drug Court has been in existence for about 13 years. Its purpose is to improve the quality of participant's lives in a timely and effective manner through substance abuse treatment, social services, and justice interventions, to help reduce the incidence of substance abuse among participants and decrease their involvement in the criminal justice system.

The Rhode Island Department of Corrections continued its work of transitioning offenders, near their releases from prison, with necessary services. Discharge Planners created transition plans, and also managed 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, a private, Providence-based social service organization that helps inmates adjust to life after their release, continued to sponsor in PY18 a program called the "9 Yards Program" that provides subsidized housing, educational training and workforce services for six months following prison release. The program is paid for with money from the Corrections Department, the Governor's Workforce Board and the Damiano Fund. 9 Yards participants recidivated back to prison less than those that did not participate in the program. The State funding of this program contributes to its goal of preventing homelessness of recently released prisoners.

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

Rhode Island also continued to support the much needed work in continuing to reduce lead-based paint hazards. Rhode Island has the 4th oldest housing stock in the nation and this stock requires proper

maintenance and rehabilitation to mitigate the hazards posed by the wide spread use of lead based paint prior to 1978.

Rhode Island also continued to support the ongoing work to reduce lead-based paint hazards. Rhode Island has the 4th oldest housing stock in the nation and this stock requires proper maintenance and rehabilitation to mitigate the hazards posed by the wide spread use of lead based paint prior to 1978. RIHousing LeadSafe Homes Program (LSHP) is a Green and Healthy Homes model program that is able to produce comprehensive interventions that reduce lead hazards, address healthy homes hazards, and reduce energy consumption in a cost effective and efficient manner for families in the Program's at risk target communities. As stated in the Strategic Plan, Goal 3 of the 2015-2019 Consolidated Plan is to improve the health, safety and energy efficiency of all Rhode Island homes. LHSP achieves this goal by remediating lead-based paint hazards, and completed remediation work in 69 households in the fifth program year. While no set-asides exist within the regulations of the program, historical program data suggests that, in a given calendar year, 60% of funds go to multi-family projects, either owner-occupied or not, and 40% go to single family homeowners.

In September, 2019, RIHousing was awarded \$7,841,160 under a new High Impact Neighborhoods Demonstration grant for lead hazard remediation. The grant is targeted to areas with high concentrations of both pre-1940 housing, low-income families, and high rates of young children with elevated blood lead levels. RIHousing's grant will address lead hazards in four census tracts in Pawtucket and Central Falls. RIHousing was also awarded \$599,800 in Healthy Homes Initiative (HHI) funds to help eliminate dangerous lead paint and other housing-related health hazards. The city of Woonsocket also received a \$4 million Lead Based Paint Hazard Control (LBPHC) grant to partner with local non-profits, the Childhood Lead Action Project (CLAP) and the Community Action Agency of Providence (CAPP), to fund lead-remediation work for homeowners and renters. This is on top of a \$1 million grant to remove lead-based paint from the city's public housing.

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

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

Family Self Sufficiency program

The Family Self-Sufficiency program, as the name suggests, does more than just provide rental assistance, but works with renters to develop escrow accounts in order to save to become homeowners. RIHousing runs a voluntary FSS program through its authority as a PHA, and receives approximately \$180,000 per year to support three full-time FSS coordinators. The had 139 participating families at the end of PY 2019; 83% of participating families have escrow account balances and several families are participating in educational programs with the intent of becoming homeowners. RIHousing conducts outreach to all HCVP participants to participate in the Homeownership program by holding quarterly presentations in which all tenants are invited to attend; RIHousing also provides support to other PHAs in increasing participation in Homeownership programs throughout the state.

Address Negative Effects of Foreclosure Crisis

The RIHousing Help Center continued to field requests for counseling services, with many of these householders receiving in-person counseling, which is funded by national foreclosure mediation grant funding, state funds provided through the mortgage crisis settlement and Rhode Island Housing's own funds. RIHousing's Help Center also continued its foreclosure mediation role, which brings together the homeowner, their counselor and the servicer to participate in a good faith effort to work out the challenges facing the borrower. These services will help the state achieve Goal 5 of the 2015-2019 Strategic Plan and served over 200 households with counseling and mediation services, while counselling over 300 callers to the HelpCenter.

2019 Action

First Down, a program administered by RIHousing provides \$7,500 in down payment assistance to qualified first-time homebuyers purchasing previously foreclosed homes and other eligible properties in 6 Rhode Island communities. If a buyer sells, refinances, or transfers the home within five years of closing the loan, a portion of the First Down loan would need to be repaid. The initiative is funded by the U.S. Department of the Treasury's Hardest Hit Fund program. Through the end of PY19 (June of 2020), 43 loans for First Down funding had been closed providing \$322,500 million in assistance.

The COVID 19 pandemic has threatened the housing stability of many homeowners and renters in Rhode Island. In response to the pandemic, in March of 2020 Congress passed the CARES Act which included foreclosure and eviction protections for homeowners and tenants. This included the right to forbearance for up to 180 days with the opportunity to extend those protection for an additional 180 days for homeowners with federally backed mortgages. Forbearance protections were also included for federally backed multi-family mortgages. Finally, the legislation included a moratorium on evictions and foreclosures for certain properties.

In April of 2020, Governor Raimondo also took steps to prevent foreclosures by partnering with two dozen mortgage lenders, including RIHousing, to voluntarily agree on a 90 day foreclosure moratorium regardless of whether a mortgage was backed by the federal government. This was followed by the

establishment of HousingHelp, a rental assistance program supported with funding through the CARES Act, to help renters impacted by the pandemic remain in their homes. District courts in Rhode Island also suspended all non-essential activities, including most eviction proceedings.

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

The coordination of State, Federal, and private resources improved access to housing and community development resources and focused these resources to high priority areas and initiatives. Recommendations continue to be made on how to improve the administration of programs by State agencies. Closer communication ties among agencies with housing programs are also being pursued to improve program coordination. Periodic meetings of the State agencies improve the coordination of current funding programs as well as implementation of new housing policies and programs.

Systems Development and Capacity Building – Consolidated Homeless Fund

In PY19, the state fully implemented a coordinated entry system for the entire state. The Coordinated Entry system, especially the diversion processes therein, serves to not only reduce the number of persons homeless but also reduce time homeless.

The Rhode Island Continuum of Care continued to improve and formalize its institutional structure in 2019. Two CoC Program Representatives are employed to assist the CoC Planner / Program Manager better coordinate the various functions of the CoC Committees and to better manage the rental assistance programs serving homeless persons in the State across various governmental and nongovernmental agencies through planning and monitoring.

The Continuum of Care 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 the ESG-funded programs (administered through the Consolidated Homeless Fund). Three standing committees focus on targeted populations: the Veterans Committee; the Families and Youth Committee; and Chronically Homeless/High Need Individuals Committee. These committees use a case conferencing approach and a service priority assessment to house these targeted populations in the most appropriate housing and to inform policy makers about policies which create barriers to successful placement. The Continuum of Care board approves and ratifies the recommendations of these CoC committees; the Board is represented by program staff that also directs the state's ESG, CDBG, HOME and HTF funds.

The state uses a housing first model to place families and individuals quickly into housing and requires treatment and services as a prerequisite to maintaining that housing. The CoC uses HMIS to identify previously homeless families seeking further homeless services and applies rapid rehousing services to these households. The CoC is committed to maximize funding for CoC and ESG rapid re-housing through reallocations. RIHousing staffs the Continuum of Care and both RIHousing and OHCD are members of the CoC Board.

Rhode Island's Consolidated Homeless Fund (CHF) combines all ESG funds (state and entitlements), state funding for homelessness, and Title XX block grant funds into one program. A committee representing

the state, ESG entitlement communities, the chair of the Housing Resources Commission, RIHousing and other relevant policy makers in homelessness set parameters for the CHF program's funding and make awards. This committee recently merged with the Continuum of Care Recipient Approval and Evaluation Committee, which now oversees the development of performance standards and monitors outcomes for both CoC and ESG-funded projects. This committee relies on information provided by the RI CoC including: point-in-time statistics, HMIS performance reports, and subrecipient capacity reports. The CoC also aids in the development of performance standards and provides outcome evaluations of all Consolidated Homeless Fund providers via the System Performance Committee.

The Chief of the Office of Housing and Committee Development is 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. Once the allocation of funds and funding priorities are determined, the Consolidated Homeless Fund issues a Request for Proposal. Eligible entities including not for profits and units of local government apply for funding in accordance with the RFP guidelines. The Consolidated Homeless Fund then convenes a review committee consisting of representatives from the Entitlement Cities (Cities of Providence, Pawtucket, and Woonsocket), the State of Rhode Island Departments of Human Services and the Office of Housing and Community Development and members of the CoC Fund Review Committee to review and evaluate proposals and to make funding decisions.

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 for the Homeless is the HMIS Lead Agency and has a memorandum of agreement with the RI CoC. The determination for assistance via ESG and CoC transitional or permanent supportive housing programs are based on HMIS data, which includes each individual's or household's vulnerability assessment score and priority designation.

In her FY21 budget proposal, Governor Raimondo recommended a significant restructuring of the RI Housing Resources Commission, the primary state housing policy body. These changes were intended to strengthen the policy development roll of the Commission while streamlining its structure and elevating housing issues at the state level. Unfortunately, as a result of the COVID-19 pandemic, work on the state budget was suspended in March, 2020. The Generally Assembly has announced that it will reconvene before the end of the year to pass the FY21 budget.

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

HUD Section 811 Project Rental Assistance Program

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

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

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

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

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

The most recent analysis of impediments to fair housing choice, entitled “Rhode Island Regional Analysis of Impediments to Fair Housing” (RAI) was completed in August 2015. The document is available for download at http://www.rhodeislandhousing.org/filelibrary/Final_RAI_August_2015.pdf. The document outlines the impediments to fair housing in the state, which outline the impediments by the following categories: Market Conditions; Housing Needs and Resources; People with Disabilities; Land Use Regulation and Infrastructure; and Discrimination. Each category of impediments includes a review of the current and past actions taken to alleviate the impediments associated with that category. The RAI included several recommendations for further action, including: - Elevate the importance of fair housing statewide - Reduce segregation and concentrated poverty and increase access to quality affordable homes throughout the state - A Fair Housing Information and Assistance Center - Provide and promote information on statewide housing opportunities - Improve access to homeownership - Inform and improve mortgage lending practices - Address the ongoing foreclosure crisis - Address housing needs of people with disabilities - Infrastructure, Zoning and Land Use reform - Ending source of income discrimination - Increase access to healthy housing - Improve Fair Housing Enforcement - Remove barriers to housing for ex-offenders. A new RAI was completed during the end of PY19 and will cover PY20 – PY24.

Some of the actions taken to address to pursue these recommendations include:

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

Governor Raimondo's FY21 budget proposal included a host of housing investments including a housing bond that was initially proposed at \$25 million but has since been increased to \$45 million, a dedicated funding stream for housing production and preservation funded with an increase to the real estate transfer tax, and incentives for municipalities to increase affordable housing by reimbursing for any increases to local education costs that might result from increased housing development. Unfortunately, as a result of the COVID-19 pandemic, work on the state budget was suspended in March, 2020.

The budget also included \$500,000 for the Livable Homes program to offset costs to build or retrofit existing homes to accommodate elderly or disabled residents. Improvements could include the installation of wheelchair ramps, grab bars for bathroom showers, widening doorways or any other renovations that would make it easier and safer for elderly or disabled individuals to stay in their homes.

Many organizations in the State are also advocating for federal legislation that has been introduced in Congress to improve and expand the extremely successful Low-Income Housing Tax Credit program (S548/HR1661). If enacted, this legislation would significantly increase production and preservation of housing in Rhode Island.

Work with municipalities to improve incentives to develop affordable housing:

Legislation was passed in 2018 that would create a municipal infrastructure grant program to issue grants and assistance for infrastructure projects that support job creation, housing, and community development. While funding for the program was not included in the FY20 budget, supporters of the bill are advocating to including bond financing in the FY21 budget to capitalize the program. In 2017, legislation was passed that requires that city and town building permit fees recover no more than the cost of permitting activities during the period of normal building activity.

Reduce property tax burdens on protected classes:

Rhode Island municipalities 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.

Advocate for Housing Policies

In PY19, RIHousing was part of a coalition of organizations that advocated for the Source of Income Fair Housing Legislation. This legislation would prohibit discrimination in housing based on a person's receipt of a lawful source of income. In particular, the bill would protect tenants that receive Section 8 Housing Choice Vouchers from housing discrimination. Under this legislation, prospective tenants could not be denied an opportunity to rent an apartment solely because they have a section 8 voucher. The bill was

passed in the Senate, but had not yet been heard in the House when the work of the General Assembly was suspended in March due to the pandemic.

Support Housing Development:

In recent years, a number of 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 2019, the RI General Assembly passed legislation creating a Senate Housing Commission to look at barriers to housing development and how to address them. RIHousing is a member of the Commission. The Commission met twice in 2020, hearing from RIHousing and Dr. EdinaldoTebaldi of the University of RI on housing market conditions, challenges to development and opportunities for legislative or policy solutions to address them. Unfortunately, work on the Commission was suspended in March due to the pandemic.

Improving Access to Homeownership:

In addition to the online homebuyer education program RIHousing offers in English and Spanish, in 2018 the Corporation began offering free, in-person homebuyer education classes in Spanish. The goal is to improve accessibility to homeownership for Spanish speaking buyers. RIHousing is also working to reduce barriers to homeownership by offering down payment assistance grants to first time homebuyers. For many homebuyers, particularly low-income households, the down payment can be the biggest barrier to purchasing their first home.

CR-40 - Monitoring 91.220 and 91.230

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

HOME

RIHousing is the designated recipient of HOME Program funds from HUD on behalf of the State of Rhode Island. RIHousing receives and administers funds provided by the HOME Investment Partnerships Act (the HOME Act, Title II of the Cranston-Gonzalez National Affordable Housing Act), which was created to provide funds to expand the supply of affordable housing for low income persons.

As administrator of funding, RIHousing is responsible for the monitoring compliance with HOME program regulations of all HOME-funded units. RIHousing conducts all monitoring related to the State HOME Program. The purpose of this monitoring is to determine if HOME funding recipients are implementing activities in compliance with HOME regulations and their contractual agreements with RIHousing. While regulatory compliance is the primary emphasis, the monitoring also looks for sound management practices and effective record keeping.

This report covers July 1, 2019 through June 30, 2020, which correlates to Rhode Island's HUD Program Year 2019.

Monitoring Procedures

To insure compliance with the requirements of HUD and Corporation Regulations, Rhode Island Housing conducts on-site inspections and financial oversight in accordance with 92.504. Asset Management and Compliance team members conduct annual file reviews and property inspections. The Compliance Specialists send HOME unit sponsors a request letter to arrange an appointment to conduct these onsite inspections.

The 2013 HOME Final Rule requires that all HOME units committed funding after 1/24/15 will be required to be reviewed under the new Uniform Physical Condition Standards (UPCS) on an ongoing basis; however, as of present HUD has not yet provided additional guidance on these standards. In the interim, RIHousing has adopted policies from its Housing Trust Fund program that cross-reference Housing Quality Standards (HQS), Uniform Property Code Standards (UPCS), and Rhode Island Property Maintenance Code into one tool. Inspection reports are compiled based on either no findings or the type of finding (Health and Safety versus a Negative finding) within InspectCheck, a mobile inspection application adopted from our HOME program monitoring by the RIHousing compliance team during the PY16. InspectCheck includes all required standards in §92.251(c), specifically regarding compliance with state and local building codes, accessibility, disaster mitigation, health and safety, lead-based paint, and all other standards listed under 24 CFR 982.401

If a property has findings during an inspection, a notice is issued to the owner to address repairs necessary to bring the unit up to the standard. Health and Safety findings must be repaired within twenty-four to forty-eight hours while negative findings may be addressed within thirty days. Owners are expected to evidence repairs and report back to the Compliance Specialist and when necessary, additional follow up inspections are scheduled.

While on-site at the property, file reviews are also taking place. Tenants agree in their leases to provide information to the landlord on rents to complete occupancy reports. Each unit is assessed for compliance using information in the file reviews, such as the occupancy information, utility allowances and the level of rent being charged. Compliance Specialists also review for income documentation, prohibited lease terms, wait lists, etc. Again, notice is provided to owners regarding findings and owners are given a reasonable timeframe to bring units into compliance.

For properties not receiving a physical visit to the site, tenant data is being reported and reviewed via an online software application called Web Tenant Compliance (WTC) that allows Compliance Specialists to review tenant data, income, rents and utility allowances. This system was added to RIHousing tools in PY16. For sites that are not in compliance with applicable regulations, a notice is sent with a timeframe for compliance outlined.

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

Site Visits Conducted

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

- For all units to which HOME funds were committed after 1/24/15, the ongoing unit inspection standard is all applicable state/local occupancy codes, or, in the absence of state/local codes, UPCS can be applied (§92.251(f)(1)(i)); and
- For projects committed prior to 1/24/15 (now deferred), the standard is applicable state/local codes, or HQS in the absence of state/local codes (§92.251(f)(2)).

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

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

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

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

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

Timing of Inspections

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

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

In PY16, RIHousing adopted a new “Risk Rating” system, which is maintained and accessible to RIHousing staff members within SmartSheets, an online platform that is utilized as an information sharing system. Ratings are updated annually and on an as needed basis. Risk ratings were updated in PY19 as compliance monitoring required.

Criteria to assess risk include program knowledge and experience, physical conditions of properties, response time to program and compliance staff, timing of annual tenant certifications, vacancy rates, and previous noncompliance findings (from HOME program file and physical inspections conducted by Rhode Island Housing and/or by third party audit firms conducting property/developer specific financial audits). Assessment tends to be informal and conducted in part between the HOME Compliance Specialist, with oversight by the HOME Program Coordinator and the Multifamily Compliance Supervisor.

There are four rating levels: Green, Yellow and Red, each representing a varying level of compliance and capacity to manage and maintain HOME-assisted units in compliance with program requirements.

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

- Yellow: Some risk present with on-site monitoring of HOME to occur every two years. This level reflects some prior findings, responsiveness to program and compliance staff, a basic knowledge and experience with the program, and a willingness to learn and engage to improve performance. Developer would be considered for funding and may receive conditional preliminary reservation based on improved performance.
- Red: Highest risk with on-site monitoring of HOME to occur every year. This level reflects multiple current and prior physical and/or file review findings, a lack of responsiveness or slow response to program and/or compliance staff, little to no knowledge and experience with the HOME program and/or housing in general, and poor financial performance for the owner and/or property. Developer would not pass threshold requirements in application process.

With the implementation of the Risk Rating system, inspections are currently being scheduled more frequently. RIHousing has seen better performance among its sponsors as their familiarity with the 2013 Rule changes has improved over PY16.

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

Analysis of Monitoring Results

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

Physical Findings:

Of the 116 units inspected in PY19, there were 244 individual findings within the 36 HOME-assisted properties inspected. Of the findings, approximately 27% were Health and Safety violations that required immediate action on the part of the owner. These properties had twenty-four to forty-eight hours to bring units back into compliance. Most common Health and Safety violations included: inoperable smoke detectors, blocked egress, and the improper storage of flammables/combustibles such as cooking grease. All of these violations have been addressed and closed. 73% of findings were general to violations of UPCS/HQS and Rhode Island Property Maintenance Code. Typical violations include stained/damaged flooring, overgrown vegetation, cracked electrical faceplates with no exposed wires, and torn refrigerator gaskets/seals. Most of these findings have been satisfactorily addressed and closed shortly after monitoring was conducted.

File Findings:

In addition to physical inspections, file reviews (both on-site and desk monitoring) occurred for 44 HOME-assisted rental projects. Key findings were addressed throughout the Program Year. Income/Asset Documentation was an area where RIHousing Compliance staff documented 16 files with missing or incomplete information. There were findings related to 8 finding related to proper verification of student status. Three findings related to a missing or outdated HOME Lease Addendum. The number of findings was a significant improvement compared with prior program years. In PY19

management training for HOME was conducted by a consultant to ensure continued improvement across the portfolio.

Annual Rent Approval

Rent approvals are reviewed and granted on an individual project basis.

CDBG

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

In designing the review system, special attention was given to Rhode Island's rather unique situation. As a state in which no community is more than 45 minutes away and there are only 33 communities eligible for the Small Cities Community Development program, Rhode Island affords the State community development staff the opportunity to be familiar with each eligible recipient, as well as the impact of each project on the local area.

The State has developed a CDBG Management Handbook that instructs communities on the various regulations of the program and requires program recipients to submit written progress reports, the primary of which are the Quarterly Progress and Close-Out Reports.

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

Tracking and review of these reports constitutes a major portion of the off-site recipient review. This system permits state staff to remain current relative to recipient progress and to identify problem areas that require special attention.

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

CRITERIA:

1. Towns with identified management concerns which may impact the local administration of the CDBG program
2. Close-Out requests reviewed
3. New CDBG administrative staff
4. Stalled programs
5. Complexity of the projects
6. Projects with no prior review
7. Town with audit findings

8. Requests for assistance
9. Standing of grants, percentages of funds drawn
10. Community's past performance

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

The Rhode Island Office of Housing & Community Development (OHCD) will carry out the statutorily mandated responsibility to review Recipient performance as cited in CDBG regulations:

“Grantees are responsible for managing the day-to-day operations of grant and subgrant supported activities. Grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Grantee monitoring must cover each program, function or activity.” 24 CFR 85.40(a)

“The state shall make reviews and audits including on-site reviews, of units of general local government as may be necessary or appropriate to meet the requirements of section 104(e)(2) of the Act... In the case of noncompliance with these requirements, the State shall take such actions as may be appropriate to prevent a continuance of the deficiency, mitigate any adverse effects or consequences and prevent a recurrence. The state shall establish remedies for units of general local government noncompliance.” 24 CFR 570.492(a)(b)

“The recipient is responsible for ensuring that CDBG funds are used in accordance with all program requirements. The use of designated public agencies, subrecipients, or contractors does not relieve the recipient of this responsibility. The recipient is also responsible for determining the adequacy of performance under subrecipient agreements and procurement contracts, and for taking appropriate action when performance problems arise...” 24 CFR 570.501(b)

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

Levels of Monitoring

OHCD monitors CDBG Recipients in two ways: in-house review and on-site review.

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

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

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

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

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

The results of this two-step process provide the basis for developing an office work plan and individual Recipient monitoring strategies. This includes: identifying which Recipients will be monitored; method of monitoring (on-site or remote); programs and areas to be monitored; areas of technical assistance and training needed; resources needed; and projected timeframes.

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

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

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

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

On-Site Review. It is OHCD policy to conduct a minimum of one on-site monitoring for each active CDBG contract prior to closeout. Monitoring visits throughout program implementation may be scheduled based on project and Recipient performance and risk. On-site technical assistance visits are performed

as needed/requested. Prior to closing out a grant, on-site review will examine Recipients' performance in the following CDBG compliance areas, as applicable:

- National Objective Compliance
- Eligibility
- Record-Keeping Systems
- Financial Management
- Non-Discriminations and Actions to Further Fair Housing
- Environment
- Labor Standards
- Citizen Participation
- Procurement
- EEO/Section 3
- Rehabilitation
- Economic Development
- Public Services
- Public Facilities and Improvements
- Acquisition, Disposition, Relocation
- Planning & Administration

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

ESG

Program Monitoring Overview

The CHF uses monitoring to help CHF/ESG sub-recipients who receive funding through the Consolidated Homeless Fund to identify problems or potential problems, and to help sub-recipients correct them.

The objectives of CHFP monitoring are to determine if Sub-recipients are:

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

Management of Monitoring Activities

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

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

Among the sources of information to be reviewed during a desktop review are:

- Request for Reimbursement and back-up documentation provided
- Audit Reports
- Approved Applications
- Quarterly/Progress Reports
- Citizen and Client Complaints

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

2. On-Site Monitoring- In addition to desktop monitoring, CHF staff may conduct an on-site monitoring visit. These visits shall be conducted as necessary. Areas to be monitored may include, but are not limited to:

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

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

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

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

- Conduct an entrance conference with the executive director, director of programs, or other sub recipient official to explain the purpose and schedule for the review.
- Interview members of the sub recipient staff to gather information about sub recipient's activities and performance.
- Review additional materials provided by the sub recipient that provide more detailed information about the program/project.

- Examine a sample of expenditures for required documentation and to verify the accuracy of information provided on invoices.
 - Perform a fiscal review of the program to assure compliance with applicable OMB circulars.
 - Review a sample of client files for required documentation that program participants meet eligibility requirements and that they are provided access to supportive services.
 - Hold an exit interview with appropriate subfreezing staff to discuss the preliminary conclusion of the review and identify any follow-up actions the sub recipient will need to take.
4. Monitoring Results - Within 60 days after completion of monitoring, CHFP will send written correspondence to the sub recipient describing the results – in sufficient detail to clearly describe the areas that were covered and the basis for the conclusions. Each monitoring letter will include:
- Date(s) of the monitoring.
 - Name(s) and title(s) of the CHFP staff person who performed the monitoring review.
 - A listing of the program activity areas reviewed (which, in most cases, will repeat the areas outlined in the notification letter to the participant).
 - A brief explanation of the reasons why an area specified in the notification letter was not monitored (e.g., time constraints, unanticipated problems arising in another area).
 - Monitoring conclusions (both positive and negative), supported by facts considered in reaching the conclusions.
 - Clearly labeled findings and concerns.
 - If there are findings, an opportunity for the sub recipient to demonstrate, within a time prescribed by HUD, that the participant has, in fact, complied with the requirements.
 - Due date of required action.
 - An offer of technical assistance, if needed, or a description of technical assistance provided during the monitoring.

HOPWA

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

CoC

The RICOC conducts its annual program monitoring exercise through its designated collaborative applicant agency, RIHousing. In PY2019, RIHousing contracted with an independent consulting firm to coordinate risk assessment, and either desk audit or a full monitoring exercise with each COC recipient and subrecipient agency based on the risk assessment. Monitoring includes review of: a sample set of Program files, organizational capacity (i.e., financial management capabilities, grant management skills, and program management competencies), consumer satisfaction, and adherence to HUD Housing

Quality Standards; and compilation of a report of annual review findings to the CoC Planner and RICO Board as requested for such follow-up as is necessary for the RICO to address poor performance.

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

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

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

In accordance with the Citizen Participation Plan, a posting was published in the Providence Journal and Noticias on December 7, 2020, which announced the comment period for the CAPER, which lasted 15 days. The public notice included details on what the Consolidated Annual Performance and Evaluation Report (CAPER) would contain, which it is drafted and submitted, and the dates for which the report covers. The public notice also included information on how to access a draft of the CAPER, which was made available online at Rhode Island Housing’s and the State Office of Housing and Community Development’s website on December 7, 2020. The public was informed through the public notice that the comment period for the draft CAPER would be open until December 22, 2020.

CR-45 - CDBG 91.520(c)

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

The State has generally maintained priorities (housing, economic development and neighborhood revitalization) and program objectives as implemented in prior program years. No significant changes to the program design are being executed at this time. Activities designed to prepare for and respond to the COVID health crisis are, however, prioritized.

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

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

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

Not applicable

CR-50 - HOME 91.520(d)

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

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

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

NOTE: See attached File title "HOME Inspection Reports Program Year 2019"

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

\$41,321.48 in Program income was used to partially fund one project in PY19. This rental rehabilitation project will create 9 HOME-assisted units for 3 extremely-low and 6 low income families.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

33 HOME rental units were completed in 2019. \$1,714,113 in total HOME funds was expended in the program year. 80 HOME units are currently under construction and will contribute to robust PY 2020 production when completed.

CR-56 - HTF 91.520(h)

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

Compliance with HTF allocation plan:

In PY 2019, construction was completed on 47 HTF-assisted units. They are fully occupied. Beneficiary data was not completed in IDIS prior to July 1, 2020. These units will be included in the PY 2020 CAPER. 83 HTF-assisted units are currently under construction. An additional 19 have received preliminary commitments.

Compliance with the requirements of 24 CFR part 93:

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

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

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

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

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

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

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

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

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

ESG Contact Name

Prefix	Mr
First Name	MICHAEL
Middle Name	J
Last Name	TONDRA
Suffix	0
Title	CHIEF, OFFICE OF HOUSING AND COMMUNITY DEVELOPMENT

ESG Contact Address

Street Address 1	315 Iron Horse Way
Street Address 2	0
City	Providence
State	RI
ZIP Code	-
Phone Number	4012226490
Extension	0
Fax Number	4012222083
Email Address	Michael.Tondra@doa.ri.gov

ESG Secondary Contact

Prefix	Ms
First Name	PHEAMO
Last Name	WITCHER
Suffix	0
Title	Principal Planner
Phone Number	4012224494
Extension	0

CAPER

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Email Address

PHEAMO.WITCHER@DOA.RI.GOV

2. Reporting Period—All Recipients Complete

Program Year Start Date

07/01/2019

Program Year End Date

06/30/2020

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

Subrecipient or Contractor Name

City

State

Zip Code

DUNS Number

Is subrecipient a victim services provider

Subrecipient Organization Type

ESG Subgrant or Contract Award Amount

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

10. Shelter Utilization

Number of New Units – Rehabbed	
Number of New Units – Conversion	
Total Number of bed - nighths available	43,798
Total Number of bed - nights provided	16,735
Capacity Utilization	38%

Table 24 – Shelter Capacity

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

The State of Rhode Island utilized two outcomes to document the successes and challenges of the ESG program. Outcome 1 measured the number of exits to positive destinations, including exits to permanent housing. A total of 48 clients exited from State ESG programs, of this amount 47 exited to positive destinations or roughly 98%. Outcome measure 2 pertained to the number of exits to emergency Shelter. No clients exited to emergency shelter.

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Prevention under Emergency Shelter Grants Program			
Subtotal Homelessness Prevention			

Table 25 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	235,911	154,299	383,016
Expenditures for Housing Relocation & Stabilization Services - Services	182,535	230,190	183,918
Expenditures for Homeless Assistance under Emergency Shelter Grants Program			
Subtotal Rapid Re-Housing	418,446	184,489	556,934

Table 26 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Essential Services			15,000
Operations	135,000	176,115	
Renovation			
Major Rehab			
Conversion			
Subtotal	135,000	176,115	15,000

Table 27 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Street Outreach	71,112	0	
HMIS			
Administration	50,396	51,008	52,433

Table 28 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2017	2018	2019
	674,954	611,612	634,367

Table 29 - Total ESG Funds Expended

11f. Match Source

	2017	2018	2019
Other Non-ESG HUD Funds			60,000
Other Federal Funds			15,000
State Government	571,954	580,116	249,502
Local Government			
Private Funds			49,281
Other			269,760
Fees			
Program Income			
Total Match Amount	571,954	580,116	643,543

Table 30 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2017	2018	2019
	1,246,908	1,191,728	1,277,910

Table 31 - Total Amount of Funds Expended on ESG Activities