

# Rhode Island Consolidated Annual Performance and Evaluation Report

For Program Year 2020  
(July 1, 2020 thru June 30, 2021)

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## Contents

CR-05 - Goals and Outcomes.....	3
CR-10 - Racial and Ethnic composition of families assisted .....	6
CR-15 - Resources and Investments 91.520(a) .....	7
CR-20 - Affordable Housing 91.520(b) .....	13
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c) .....	15
CR-30 - Public Housing 91.220(h); 91.320(j) .....	19
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j).....	21
CR-40 - Monitoring 91.220 and 91.230.....	34
CR-45 - CDBG 91.520(c).....	45
CR-50 - HOME 91.520(d) .....	46
CR-56 - HTF 91.520(h) .....	48
CR-60 - ESG 91.520(g) (ESG Recipients only) .....	49
CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes.....	51
CR-75 – Expenditures .....	52

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

In PY19, Rhode Island was awarded \$7,841,160 under a new High Impact Neighborhoods Demonstration grant for lead hazard remediation in several zip codes in Pawtucket and Central Falls. All of the new systems required for this new lead program were developed during PY20 and new projects are currently underway with remediation expected during PY21. While the number of healthy homes projects completed did not meet the goals set for PY20, 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. Many housing-oriented initiatives came online during PY20, with several of these programs aiming to minimize the housing impacts of the pandemic continuing into PY2021. These included a statewide eviction moratorium, housing payment assistance, and significantly increased housing for those experiencing homelessness.

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

Rhode Island was able to develop and preserve a significant amount of affordable housing in PY20. 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 824 housing units were developed or preserved, which is 150% 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 PY20 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 PY20.

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, though the state exceeded the goal set for rapid rehousing by more than 150%. This may be due to the success of the state’s coordinated entry system, which was fully implemented in PY19 and improved during PY20. However, the state fell short of achieving its goal for providing overnight shelter for homeless individuals.

Goal	Indicator	Unit of Measure	Expected – Program Year	Actual – Program Year	Percent Complete
Develop and Preserve Affordable Housing	Rental units constructed	Household Housing Unit	42	57	135.7%
Develop and Preserve Affordable Housing	Rental units rehabilitated	Household Housing Unit	477	737	154.5%
Develop and Preserve Affordable Housing	Homeowner Housing Added	Household Housing Unit	8	11	137.5%
Develop and Preserve Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	3	0	0.0%
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	0	0	-
Improve health, safety and efficiency of all homes	Rental units rehabilitated	Household Housing Unit	69	34	49.3%
Improve health, safety and efficiency of all homes	Homeowner Housing Rehabilitated	Household Housing Unit	125	35	28.0%
Improve health, safety and efficiency of all homes	Other	Other	85	0	0.0%

Goal	Indicator	Unit of Measure	Expected – Program Year	Actual – Program Year	Percent Complete
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	566.7%
Prevent and End Homelessness	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	315	801	254.3%
Prevent and End Homelessness	Homeless Person Overnight Shelter	Persons Assisted	3000	2142	71.4%
Prevent and End Homelessness	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	24	0	0.0%
Prevent and End Homelessness	Homelessness Prevention	Persons Assisted	6	0	0.0%
Prevent and End Homelessness	Housing for Homeless added	Household Housing Unit	0	0	-
Prevent and End Homelessness	HIV/AIDS Housing Operations	Household Housing Unit	50	48	96.0%
Prevent and End Homelessness	Other	Other	0	0	-

**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 5 and 6 (Table 50 of the 2020-2024 Consolidated Plan) are directly addressed by the distribution of these funds.

## CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME	ESG	HTF
White	413	28	119	11
Black or African American	30	16	52	6
Asian	3	0	0	0
American Indian or American Native	2	2	3	1
Native Hawaiian or Other Pacific Islander	1	1	0	0
<b>Total</b>	<b>449</b>	<b>47</b>	<b>174</b>	<b>18</b>
Hispanic	18	23	70	32
Not Hispanic	459	33	104	14
<b>Total</b>	<b>477</b>	<b>56</b>	<b>174</b>	<b>46</b>

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.

92 HTF-assisted units are currently under construction. An additional 32 have received preliminary commitments.

### Homeownership and Mortgage Services

During PY2020, RIHousing and its partners originated mortgages for 1,598 low and moderate-income Rhode Island households totaling \$417,996,666 to purchase homes. An additional \$15,410,141 helped 1,521 of these households with second mortgages. RIHousing maintained its percentage of new first mortgages to minority borrowers, with 52.9% of first time homebuyers being either from racial or ethnic minorities.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	5,492,396	2,572,299
HOME	public - federal	7,012,168.35	1,853,502
ESG	public - federal	718,868	681,616
HTF	public - federal	5,482,844.60	3,873,782.66
Continuum of Care	public - federal	8,099,399	3,772,535
LIHTC	public - federal	4,417,500	4,893,193
Section 811	public - federal	1,000,000	\$302,079
Other	private	2,400,000	2,400,000
Other	public - federal	2,688,192	2,688,192
Other	public - state	2,250,000	2,250,000

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 caused by the housing crisis. State ESG funding assisted organizations to address homelessness statewide, as well as in the targeted communities of Providence, Woonsocket, and Pawtucket, which are

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



## Leveraging

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

### ESG

In PY20, 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 \$586,681 in state funding in PY19, which represents a decrease of 8.8% in the amount leveraged compared to the previous government fiscal year. This decrease occurred as a result of the state ending the practice of providing cash match on behalf of its grant recipients. Instead, in PY 20 grant recipients were required to provide a 100% cash match using non-Hearth Sources of Funds.

### HOME

HOME applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. PY20 match was achieved using cash equivalents from non-federal sources and state bond programs.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	\$86,670,461.80
2. Match contributed during current Federal fiscal year	\$2,185,190
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$88,855,651.80
4. Match liability for current Federal fiscal year	\$0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$88,855,651.80

**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
5628	8/6/2020						\$2,185,190	\$2,185,190
								\$2,185,190

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 beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
<b>\$958,036.22</b>	\$35,897.77	\$0	<b>\$0</b>	<b>\$993,933.99</b>

Table 7 – Program Income

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Number	2					2
Dollar Amount	\$10,523,530					\$10,523,530
<b>Sub-Contracts</b>						
Number	29				1	28
Dollar Amount	\$6,046,662				\$659,192	\$9,864,338
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Number	2	0	2			
Dollar Amount	\$10,523,530	0	\$10,523,530			
<b>Sub-Contracts</b>						
Number	29	0	29			
Dollar Amount	\$6,046,662	0	\$6,046,662			

**Table 8 - Minority Business and Women Business Enterprises**

<b>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</b>						
	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**

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

**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	146	181
Number of Non-Homeless households to be provided affordable housing units	585	748
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>731</b>	<b>929</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	190	124
Number of households supported through The Production of New Units	63	57
Number of households supported through Rehab of Existing Units	478	692
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>731</b>	<b>873</b>

Table 12 – Number of Households Supported

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

While the state continues to struggle with a low voucher utilization rate, Rhode Island surpassed its goal for total household support in large part due to its increased rehabilitation rate compared to previous years. Rhode Island's low rental vacancy rate, which impedes lease up, is one of the most significant contributors to the low voucher utilization rate, as well as the source of income discrimination that voucher holders have historically faced. Shared jurisdiction between PHAs in the state continues to be explored as a potential solution, and legislation prohibiting discrimination on the basis of an individual's source of income was passed in April 2021.

**Discuss how these outcomes will impact future annual action plans.**

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

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

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>	<b>HTF Actual</b>
Extremely Low-income	393	45	47
Low-income	93	3	0
Moderate-income	14	19	0
<b>Total</b>	<b>500</b>	<b>67</b>	<b>47</b>

**Table 13 – Number of Households Served**

**Narrative Information**

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

92 HTF-assisted units are currently under construction. An additional 32 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 (RiCoC) has a strong outreach system. The State Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) and the Office of Housing and Community Development have used Projects for Assistance in Transition from Homelessness (PATH) and Consolidated Homeless Fund (CHF) funding to ensure that outreach teams exist throughout the state to connect homeless individuals and families with housing and services that they require. The CHF is a braided federal and state funding source that awards funding to eligible projects for street outreach, which provides essential services to unsheltered homeless persons, connecting them with emergency shelter, housing, or critical services. The eligible costs and requirements for essential services consist of engagement, case management, emergency health and mental health services, transportation, and services for special populations. CHF funds are used for these services to the extent that other appropriate funding sources for these services are inaccessible or unavailable within the community.

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

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

In PY20, the State's homelessness programming, as measured through the State Homeless Management Information Systems database, served 2,120 persons with emergency shelter and 223 persons with transitional housing. The Consolidated Homeless Fund and the Continuum of Care combine to fund 262 transitional housing units per year, with 81% of these homes being available to households with children. Transitional housing is intended to be a steppingstone for a household while they are securing their own homes. A case manager works with the household in transition to develop a case plan that has realistic outcomes, recognizes the strengths of the household and addresses barriers to independent living, and develops action steps to make that transition. Case managers work with members of the household to attend financial literacy and other life-skills workshops that are available in the immediate

area. Services available include referrals to community healthcare resources and assistance with obtaining health insurance. Some units of transitional housing include nurses and psychiatrists to address client needs for psychotropic medications and to monitor their health status. Applicants for funding to operate transitional housing include measurements of outcomes related to successfully transitioning clients to permanent housing, usually as percentages of clients that achieve increased income, secure permanent housing, or achieve goals as part of their individual service plans. The State and entitlement city ESG funds awards are coordinated to ensure all parts of the state can meet the emergency shelter, Rapid Rehousing and Street outreach needs of 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). Rhode Island received the base \$300,000 PATH grant again during PY20 and was approved for additional funding to be used for technical assistance and training. This grant targets people who are suffering from serious mental illness and substance abuse and who are 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 and high acuity individuals and families have been a priority for placement into permanent supportive housing in Rhode Island for the past several years. This commitment has been supported by the institutionalization of universal assessment tools, which prioritize shelter and housing for the most vulnerable people experiencing homelessness. These tools guide the Coordinated Entry System (CES), which is managed through RI's Homeless Management Information System (HMIS). Both CES and HMIS are key functions of the RICoC and are implemented by the RI Coalition to End Homelessness. CES utilizes a prioritization list from HMIS for shelter and housing ranked by longest length of stay and acuity, among other prioritization criteria defined by the RICoC.

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

The RICoC 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 rental assistance to further increase the opportunities for persons to avoid homelessness.

## 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 1,600 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, a local version of HUD's Moving On initiative, and 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.

#### 2020 ACTION:

- **Foster Youth to Independence (FYI) Initiative:** RIHousing elected to participate in the FYI Initiative and received approval from HUD to issue the first 10 of 25 housing choice vouchers to members of this vulnerable population. In November 2020, Rhode Island received \$94,340 as part of the FYI Initiative to provide supportive assistance, including education and employment support, for up to 36 months to at-risk former foster youth who are aging out of foster care.
- **Move-Up Initiative:** RIHousing 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. In 2021, RIHousing elevated its preference for families currently in an unstable housing situation, where they are receiving a subsidy that is set to expire or otherwise end and are at increased risk of homelessness.
- **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 18 agencies now participating throughout the state. During PY2019, RIHousing recruited two additional PHAs to participate, bringing the total to 19. With the Centralized Waitlist Portal families have the ability to access one application for thirty-four project-based voucher wait lists and wait lists for eighteen housing choice voucher programs all from one online portal. RIHousing plans to continue 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 and performed better owner outreach.** Since the inception of the Housing Stabilization Specialist (HSS) program in Summer 2016 RIHousing's HSS team has continued to support households who are at risk of eviction or who have been issued a voucher and are struggling to locate an apartment. To date, 330 households have been served and RIHousing will continue to build on these numbers in PY21 as well. The HSS team has also launched a robust Landlord Recruitment strategy that includes outreach to communities across the state as well as providing local real estate agencies with information regarding Housing Choice Voucher Program. They have also continued to host SMART landlord presentations and held the second annual Landlord Appreciation and Resource Fair virtually in PY20. The quarterly landlord newsletter was

launched to direct the landlord community to a list of resources accessible to them in the hopes of continuing to increase the population of landlords who participate in the HCV program in PY21. Governor McKee's FY22 Budget also included the creation of a \$6 million "Pay for Success" permanent supportive housing (PSH) pilot program for those experiencing chronic homelessness in Rhode Island. Supported by social impact bonds, the initiative aims to improve the services received by chronically homeless households, prevent crises, and decrease the utilization of emergency services. By increasing spending for preventative services, the program is expected to save the state between \$1.8 million and \$2.6 million per year by reducing emergency care and justice system expenses for approximately 125 chronically homeless Rhode Islanders.

### **Actions 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 25 years and currently has 139 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 2020, RIHousing had 21 families graduate from the program and disbursed \$171,806 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. In the 2021 session, the General Assembly also established two commissions to study these barriers. A commission was formed to study the Low- and Moderate-Income Housing Act, along with a commission to study current land use laws and regulations in the state. Additionally, the General Assembly passed legislation to require all municipalities to have E-permitting procedures for every step in the building/development process established by July 1, 2023.

Governor McKee's FY22 budget included numerous initiatives aiming to improve the stock of affordable housing in the state, including the establishment of a new restricted receipt fund to encourage housing production and municipal housing development partnerships, while also ending the double taxation of affordable housing developments. This permanent funding stream (Housing Production Fund) is expected to dedicate \$2.6 million in FY22 and \$5.7 million annually towards the creation of affordable housing by reallocating a portion of the State's general revenue share of the existing conveyance tax and by dedicating an increase of the real estate conveyance tax on the portions of residential property sales exceeding \$800,000, with an initial capital appropriation of \$25 million to begin the fund. The budget also included \$20 million for the State's Historic Preservation Tax Credit which has been an important resource for affordable housing development through the conversion of mill space to housing or the preservation of Rhode Island's very old multi-family housing stock as affordable housing. A position for the state's first Deputy Secretary of Commerce and Housing, who will oversee housing initiatives and develop a housing plan that will include affordable housing, strong community building and neighborhood revitalization efforts, was also created under this budget.

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

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 PY20, 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. In the FY 2022 budget, the General Assembly also authorized a Pay for Success program to assist in housing those experiencing chronic homelessness, the first social impact bond of its kind. The program received \$6 million for a five-year pilot program.

The COVID-19 pandemic severely affected the state throughout PY20, prompting the implementation of programs to address the needs of those impacted during this period. Strategies implemented included de-concentration of homeless shelters by moving shelter residents into hotels and into private housing with emergency rental assistance and rent and utility assistance for renters impacted by the pandemic. To help residents weather the economic effects of the COVID-19 pandemic, HousingHelpRI was established in PY20 with an initial budget of \$6 million, which provided rental assistance for households that experienced a loss of income due to the COVID-19 emergency and faced immediate risk of homelessness. The Safe Harbor Housing Program similarly began in PY20 with an initial \$7 million budget to assist households in paying up to six months of owed rent, as well as to aid in resolving rent-related disputes between landlords and tenants. Both programs have since depleted their originally allocated funds. Rent Relief RI, the state's latest rental assistance program, was established at the end of PY20 with a total grant of \$352 million through the federal Emergency Rental Assistance Program to provide rental and utility relief payments to eligible renters and landlords. As of the end of PY20, \$2.3 million of this funding had been obligated, with the remainder to be disbursed in PY21.

The State also utilized federal Coronavirus Relief Funds to purchase properties for immediate use as shelters, but with the long-term intent of converting these structures to permanent supportive housing.

The State additionally used its Emergency Solutions Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA) and Community Development Block Grant (CDBG), supplemental COVID allocations to help provide essential services and support increased operating costs of programs, made necessary due to the pandemic. Activities supported included increased cleaning services of emergency shelters, sanitation stations throughout the State for the unsheltered and additional shelter/housing opportunities for persons experiencing homelessness or at-risk of housing instability.

#### 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 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 2021, RIHousing has approved 56 units under this program, housing 28 households.

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.

#### 2020 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

#### 2020 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.

#### 2020 Action

In 2020, 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 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

#### 2020 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 (TPCP), in conjunction with the Department of Corrections (DOC), the Rhode Island Parole Board. The program's substance abuse treatment providers have been working closely to assist in the transition of inmates back into their communities by providing/coordinating substance abuse services to those individuals who are eligible for parole and in need of services upon their release from the ACI. The Rhode Island Adult Drug Court's main 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 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 PY20 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 ongoing work to reduce lead-based paint hazards. Rhode Island has the 4th oldest housing stock in the nation and this stock requires proper maintenance and rehabilitation to mitigate the hazards posed by the widespread use of lead-based paint prior to 1978.

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

Pawtucket and Central Falls. New LSHP systems were developed for effectively utilizing these funds during PY20 and new projects are currently underway with remediation expected during PY21.

### **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*

In addition to providing rental assistance, the Family Self-Sufficiency program works with renters to develop escrow accounts in order to save for homeownership. RIHousing runs a voluntary FSS program through its authority as a PHA and receives approximately \$200,000 per year to support three full-time FSS coordinators. The FSS graduated 21 families from the program in PY 2020 and disbursed a total of \$171,806 in FSS escrow funds. In PY2020, about 139 families were enrolled in the program, of which 40 were newly enrolled during the program year. Many enrolled families also established savings accounts and began participating in educational programs with the intent of becoming homeowners. RIHousing conducts outreach to all HCVP participants to participate in the Homeownership program by holding quarterly presentations to which all tenants are invited to attend; RIHousing also provides support to other PHAs in increasing participation in Homeownership programs throughout the state.

#### 2020 Action

In PY20, RIHousing continued providing \$7,500 in down payment assistance to eligible first-time homebuyers through their First Down, which was funded by the U.S. Department of the Treasury's Hardest Hit Fund program, and Spring 7500 programs. These initiatives were replaced in PY20 with a new program administered by RIHousing, 10kDPA. During PY2020, 127 loans totaling \$952,500 were issued through the Spring 7500 program and 83 loans totaling \$622,500 were issued through the First Down program. 10kDPA similarly provides down payment assistance to first-time homebuyers in Rhode Island with interest-free loans of \$10,000. Through the end of PY20, 527 loans for 10kDPA funding had been closed providing \$5,270,000 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. This option may still be exercised through the remainder of the COVID-19 pandemic, with forbearance requests being accepted until the end of September 2021. Forbearance protections were also included for federally backed multi-family mortgages. Finally, the legislation included a moratorium on evictions and foreclosures for certain properties which expired on July 25, 2020. Following the CARES Act eviction moratorium expiration, the CDC issued an additional moratorium on evictions, further protecting many renters from eviction following non-payment of rent, which has been extended through July 31, 2021.

In April of 2020, the EOHHS approved Emergency Case Management services for the duration of the COVID-19 crisis, which assists organizations, homeless populations, and residents in quarantine or who have tested positive for COVID-19 in receiving health-related supports. Several rental assistance programs, including HousingHelpRI and Safe Harbor were established in PY2020 with funding through the CARES Act to help renters impacted by the pandemic remain in their homes. Following the expirations of these programs, RIHousing established the RentReliefRI program at the end of PY20, which has been funded through the federal Emergency Rental Assistance program and will continue into PY2021.

### **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 PY20, the state continued the implementation and refinement of its Coordinated Entry System (CES) for the entire state with funding from the Consolidated Homeless Fund, the Continuum of Care, and the Emergency Solutions Grant. The CES, especially the diversion processes therein, serves to not only reduce the number of persons entering homelessness but also to reduce time spent homeless. In PY20, the RI Coalition to End Homelessness assumed oversight of the CES, including call center operations, which were made available 365 days a year beginning in December of 2020, housing assistance assessment, and referral components, such as shelter referral and housing prioritization. As part of its crisis intervention efforts, Rhode Island's CES also provides a range of outreach services to homeless adults and families.

The Rhode Island Continuum of Care continued to improve and formalize its institutional structure in 2020. 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. A fourth standing committee, the youth action board, is comprised of youth under age 25 who have or are currently experiencing homelessness to inform the design of a system to end unaccompanied youth homelessness in Rhode Island. The Continuum of Care board of directors 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 chief 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 merged in recent years with the Continuum of Care Recipient Approval and Evaluation Committee, which now oversees the development of performance standards and monitors outcomes for CoC funded projects. This combined homeless system funding committee relies on information provided by the RICoC including point-in-time statistics, HMIS performance reports, and subrecipient capacity reports. The CoC also aids in the development of performance standards and provides outcome evaluations of all Consolidated Homeless Fund providers via the System Performance Committee.

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 supportive housing programs are based on HMIS data, which includes each individual's or household's vulnerability assessment score and priority designation. To the extent RCoC and OHCD programs support survivors of domestic violence, data is held in a comparable database, which is overseen in RI by the Coalition to End Domestic Violence; this is required both for security reasons and regulatory compliance.

In his FY22 budget proposal, Governor McKee 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. These changes were not incorporated in the State budget, however, as noted earlier, the budget created a position for the State's first Deputy Secretary of Commerce and Housing, who will oversee housing initiatives and develop a housing plan that will include affordable housing, strong community building and neighborhood revitalization efforts. The position is within the Executive Office of Commerce, with broad authorities and responsibility for coordinating with HRC Coordinating Committee on development of a housing plan and an extensive "integrated housing report" by December 31, 2021, and annually thereafter.

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

HUD Section 811 Project Rental Assistance Program

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

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

- The effects of this system change will be measured by:
- The decreased number of disabled individuals on waitlists
- The increased number of disabled individuals who are placed in integrated community-based settings

- Improved housing retention (fewer evictions and abandoned apartments)
- Increased housing stability (fewer hospitalizations/emergency room visits, less interfacing with law enforcement, fewer tenant landlord disputes)
- Shorter length of stays in institutions
- Fewer re-admissions to institutions

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

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

The most recent analysis of impediments to fair housing choice, entitled “State of Rhode Island Analysis of Impediments to Fair Housing Choice” (RAI) was completed in June 2020. The document is available for download at <https://ohcd.ri.gov/sites/g/files/xkgbur401/files/announcements/ai-2020-final.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 identified several impediments requiring further action, including:

- Inadequate supply of affordable housing that: is accessible to persons with disabilities, provides a healthy home environment, is located in higher opportunity areas
- Inadequate level of public transportation to efficiently connect people with employment and other important community assets
- Public opposition to new affordable housing developments
- Inadequate level of funding to address affordable housing
- Discriminatory behavior toward members of the protected classes

In addition to these action areas, the RAI also identified localized issues and offered recommendations for participating municipalities, including Cranston, East Providence, Pawtucket, and Providence.

Some of the actions taken in PY20 to address these impediments include:

Inadequate Supply of Affordable Housing:

In March of 2021 voters in RI approved a new \$65 million housing bond to fund the development and preservation of affordable housing and community revitalization. The first RFP to allocate these funds will be undertaken in PY21.

The FY22 Budget also included new resources to support increased housing production, including the establishment of a new restricted receipt fund. This permanent funding stream was capitalized with an initial \$25 million appropriation and is expected to generate \$2.6 million in FY22 and \$5.7 million annually towards the creation of affordable housing by dedicating an increase of the real estate conveyance tax on the portions of residential property values exceeding \$700,000 to housing production and preservation. The budget also created the position of Deputy Secretary of Commerce and Housing, who will oversee housing initiatives and develop a housing plan that will include affordable housing production and preservation goals as well as strong community building and neighborhood revitalization efforts.

#### Inadequate Level of Public Transportation:

In December 2020, the State Planning Council adopted Transit Forward RI 2040, a blueprint for enhancing and expanding Rhode Island's public transit system over the next 20 years in accordance with growing economic inequality and climate concerns. This plan includes initiatives to improve existing transit services, expand services to new areas, develop high-capacity transit, improve transit access, and make services easier to use.

#### Public Opposition to New Affordable Housing Developments:

Rhode Island is currently experiencing a severe housing shortage which is reflected in rapidly rising home prices and rents and historically low vacancy rates. All levels of political leadership at the State, and in some cases, the municipal level, have elevated housing production as one of the top issues that needs to be addressed to meet existing and projected housing needs and ensure economic growth. The House has created two Commissions to focus on this issue, one targeted on improving the effectiveness of the State's Low- and Moderate-Income Housing Act, the other focused on state and local land use practices that may hamper housing development. In addition, the Lieutenant Governor has identified affordable housing as one of her top priorities and begun a series of virtual community conversations aimed at identifying the housing challenges facing the State and the options for addressing those challenges. These community conversations will culminate with a Housing Summit planned for the Fall of 2021.

Housing construction was not halted during the pandemic, and during the Spring and Summer of 2021, RI Housing and affordable housing developers have resumed ribbon-cuttings for affordable housing developments that have been completed, highlighting how these attractive and high-quality developments are meeting community needs and represent an asset to the community.

#### Inadequate Funding Level:

In her FY21 budget, Governor Raimondo included \$65 million in bonds for building and renovating housing projects, which was voted upon and approved in a special election in March 2021.

Governor McKee's FY22 budget includes the creation of the state's first permanent funding stream for the creation of affordable housing through an increase in the conveyance tax on high-end real estate,



which is expected to generate approximately \$4 million each year. The fund was capitalized with an initial investment of \$25 million. The budget also included \$20 million for the State's Historic Preservation Tax Credit which has been an important resource for affordable housing development through the conversion of mill space to housing or the preservation of Rhode Island's very old multi-family housing stock as affordable housing.

Discriminatory Behavior Toward Members of the Protected Classes:

In April 2021, Governor McKee signed legislation adding "Source of Income" as a protected class under the State's Fair Housing Practices Act, which adds "lawful source of income" to the list of statutes that landlords may not use when deciding whether to rent to an individual, preventing prospective tenants from being denied housing for owning a government housing voucher. This new law prohibits landlords from engaging in actions such as denying housing, limiting access to housing, discouraging home seekers, making or publishing discriminatory statements, or creating different terms, conditions, rules, fees, or standards because of one's membership in a protected class due to their reliance on a lawful source of income including rental assistance programs.

## **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 monitoring the 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, 2020 through June 30, 2021, which correlates to Rhode Island's HUD Program Year 2020. Monitoring Procedures

To ensure 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 sends 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 absences 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

**Due to COVID-19, RIHousing deferred all physical inspections of properties effective 3/19/20 through 09/30/2021.**

#### File Findings

File reviews occurred for 51 HOME-assisted rental projects. Key findings were addressed throughout the Program Year. RIHousing Compliance staff documented an increase of late certifications due to COVID-19; 23 files had late or incomplete information. Income/Asset findings decreased as a result of late/incomplete certifications. There were 8 findings related to proper verification of student status. Two findings related to a missing or outdated HOME Lease Addendum.

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

#### Annual Rent/Utility Allowance Approval and Desk Monitoring

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

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

## CDBG

The State of 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 criterion to facilitate calculation of an overall risk score and ranking order. A Recipient determined to have high risk levels will require on-site monitoring. High-risk Recipients might 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 RCoC conducts its annual program monitoring exercise through its designated collaborative applicant agency, RIHousing. In PY2020, 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, but is not limited to, 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. A report of annual monitoring findings goes to the agency, the RICO C Planner, and RICO C Board. A cumulative report identifying themes noticed during monitoring informs an annual training plan as is necessary for the RICO C to address areas for improvement.

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

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

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

In accordance with the Citizen Participation Plan, a posting was published in the Providence Journal and Noticias on September 9, 2021, 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 September 9, 2021. The public was informed through the public notice that the comment period for the draft CAPER would be open until September 24, 2021.

**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)**

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

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

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

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

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

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

\$41,321.48 in Program income was expended in PY 2020 for a rental rehabilitation project that will create 9 HOME-assisted units for 3 extremely low and 6 low-income families. This project is owned by a non-profit developer.

**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)**

11 HOME rental units and 10 homeownership units were completed in 2020. \$1,853,502.00 in total HOME funds was expended in the program year. 79 HOME units are currently under construction. 75 units have received preliminary commitments.

**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:**

92 HTF-assisted units are currently under construction. An additional 32 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

49

**Email Address**

PHEAMO.WITCHER@DOA.RI.GOV

**2. Reporting Period—All Recipients Complete**

**Program Year Start Date**

07/01/2020

**Program Year End Date**

06/30/2021

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

Table 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		
	2018	2019	2020
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			
<b>Subtotal Homelessness Prevention</b>			

Table 25 – ESG Expenditures for Homelessness Prevention

#### 11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	154,299	383,016	296,933
Expenditures for Housing Relocation & Stabilization Services - Services	230,190	183,918	249,490
Expenditures for Homeless Assistance under Emergency Shelter Grants Program			
<b>Subtotal Rapid Re-Housing</b>	184,489	556,934	546,423

Table 26 – ESG Expenditures for Rapid Re-Housing

**11c. ESG Expenditures for Emergency Shelter**

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Essential Services		15,000	15,000
Operations	176,115		
Renovation			
Major Rehab			
Conversion			
<b>Subtotal</b>	176,115	15,000	15,000

**Table 27 – ESG Expenditures for Emergency Shelter**

**11d. Other Grant Expenditures**

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Street Outreach	0	0	0
HMIS	0	0	0
Administration	51,008	52,433	53,419

**Table 28 - Other Grant Expenditures**

**11e. Total ESG Grant Funds**

Total ESG Funds Expended	2018	2019	2020
	611,612	634,367	681,616

**Table 29 - Total ESG Funds Expended**

**11f. Match Source**

	<b>2018</b>	<b>2019</b>	<b>2020</b>
Other Non-ESG HUD Funds		60,000	0
Other Federal Funds		15,000	15,000
State Government	580,116	249,502	571,681
Local Government			
Private Funds		49,281	
Other		269,760	
Fees			
Program Income			
<b>Total Match Amount</b>	580,116	643,543	586,681

**Table 30 - Other Funds Expended on Eligible ESG Activities**

**11g. Total**

<b>Total Amount of Funds Expended on ESG Activities</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
	1,603,340	1,902,277	1,883,139

**Table 31 - Total Amount of Funds Expended on ESG Activities**