

Rhode Island Consolidated Annual Performance and Evaluation Report

For Program Year 2021
(July 1, 2021 thru June 30, 2022)

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CR-05 - Goals and Outcomes

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

Program Year 2021 is the second 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 2021 Annual Action plan. Notably, development and preservation of affordable units continued at a faster pace than anticipated, despite challenges that persisted as a result of the COVID-19 pandemic.

In PY19, Rhode Island was awarded \$7,841,160 under a new High Impact Neighborhoods Demonstration grant for lead hazard remediation in several zip codes in Pawtucket and Central Falls. All of the new systems required for this new lead program were developed during PY20 with remediation beginning in PY21. While the number of healthy homes projects completed did not meet the goals set for PY21, remediation completion rates are expected to continue to grow as a result of the work associated with the new grant in the coming years. This growth is expected to more than compensate for the lower outcomes observed in PY2021 .

Like the rest of the country and the world, Rhode Island had to redirect many of its efforts in response to the COVID-19 crisis in 2020. Many housing-oriented initiatives came online during PY20, with several of these programs aiming to minimize the housing impacts of the pandemic continuing into PY2021. 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 PY21. 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 1,046 housing units were developed or preserved, which is 209% of the annual goal set out in the Consolidated Plan.

The total number of households served in pursuit of the goal to improve the health, safety and efficiency of all homes did not meet the PY21 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 lingering effects of the COVID-19 crisis limited the ability of program staff to complete work including inspections for much of PY21, 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 PY21.

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 homelessness prevention by about 4600%. This may be due to the success of the state’s coordinated entry system, which was fully implemented in PY19 and continued to improve during PY21. However, the state fell short of achieving its goal for rapid rehousing.

Goal	Indicator	Unit of Measure	Expected – Program Year	Actual – Program Year	Percent Complete
Develop and Preserve Affordable Housing	Rental units constructed	Household Housing Unit	42	306	728.6%
Develop and Preserve Affordable Housing	Rental units rehabilitated	Household Housing Unit	477	729	152.8%
Develop and Preserve Affordable Housing	Homeowner Housing Added	Household Housing Unit	8	5	62.5%
Develop and Preserve Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	3	6	200%
Develop and Preserve Affordable Housing	Housing for Homeless added	Household Housing Unit	21	0	0%
Improve health, safety and efficiency of all homes	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	3	--
Improve health, safety and efficiency of all homes	Rental units rehabilitated	Household Housing Unit	69	25	36.2%
Improve health, safety and efficiency of all homes	Homeowner Housing Rehabilitated	Household Housing Unit	125	31	24.8%
Improve health, safety and efficiency of all homes	Other	Other	0	20	23.5%

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	16,167	107.8%
Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	750	2,400	320%
Non-Housing Community Development	Businesses assisted	Businesses Assisted	0	10	333.3%
Prevent and End Homelessness	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	315	188	59.7%
Prevent and End Homelessness	Homeless Person Overnight Shelter	Persons Assisted	3,000	2,899	96.6%
Prevent and End Homelessness	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	24	0	0%
Prevent and End Homelessness	Homelessness Prevention	Persons Assisted	6	276	4600%
Prevent and End Homelessness	Housing for Homeless added	Household Housing Unit	0	3	--
Prevent and End Homelessness	HIV/AIDS Housing Operations	Household Housing Unit	0	0	0%
Prevent and End Homelessness	Other	Other	0	0	0%

Table 1 - Accomplishments – Program Year

Goal	Indicator	Unit of Measure	Expected	Actual	Percent Complete
Develop and Preserve Affordable Housing	Rental units constructed	Household Housing Unit	210	363	172.9%
Develop and Preserve Affordable Housing	Rental units rehabilitated	Household Housing Unit	2,315	1,466	63.3%
Develop and Preserve Affordable Housing	Homeowner Housing Added	Household Housing Unit	35	16	45.7%
Develop and Preserve Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	15	6	40.0%
Develop and Preserve Affordable Housing	Housing for Homeless added	Household Housing Unit	105	19	18.1%
Improve health, safety and efficiency of all homes	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	3	-
Improve health, safety and efficiency of all homes	Rental units rehabilitated	Household Housing Unit	490	59	12.0%
Improve health, safety and efficiency of all homes	Homeowner Housing Rehabilitated	Household Housing Unit	1,055	66	6.3%
Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	75,000	35,637	47.5%
Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3,750	3,064	81.7%
Prevent and End Homelessness	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1,250	989	79.1%
Prevent and End Homelessness	Homeless Person Overnight Shelter	Persons Assisted	15,000	5,041	33.6%

Goal	Indicator	Unit of Measure	Expected	Actual	Percent Complete
Prevent and End Homelessness	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	120	0	0.0%
Prevent and End Homelessness	Homelessness Prevention	Persons Assisted	30	276	920.0%
Prevent and End Homelessness	Housing for Homeless added	Household Housing Unit	0	3	-
Prevent and End Homelessness	HIV/AIDS Housing Operations	Household Housing Unit	0	48	-
Prevent and End Homelessness	Other	Other	0	0	-

Table 2 - Accomplishments – Strategic Plan to Date

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

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

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME	ESG	HTF
White	2,901	31	400	26
Black or African American	657	14	167	21
Asian	319	6	6	3
American Indian or American Native	60	5	19	14
Native Hawaiian or Other Pacific Islander	19	5	2	8
Other or Multiple Races	0	0	51	0
Unknown	0	0	17	0
Total	4,069	61	662	72
Hispanic	674	30	170	19
Not Hispanic	3,395	31	484	53
Unknown	0	0	8	0
Total	4,069	61	662	72

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

Narrative

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

32 HTF-assisted units are currently under construction. An additional 35 have received preliminary commitments.

Homeownership and Mortgage Services

During PY2021, RIHousing and its partners originated mortgages for 1,574 low and moderate-income Rhode Island households totaling \$477,142,819 to purchase homes. An additional \$18,918,549 helped 1,572 of these households with second mortgages. RIHousing maintained its percentage of new first mortgages to minority borrowers, with 60% 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	12,858,184	2,656,197
HOME	public - federal	5,948,426	3,423,358
ESG	public - federal	710,081	619,644
HTF	public - federal	4,579,187	3,881,971
Continuum of Care	public - federal	10,405,306	7,699,000
LIHTC	public - federal	3,807,756	7,015,992
Section 811	public - federal	1,000,000	548,309
Other	private	1,325,000	1,325,000
Other	public - federal	4,962,578	4,962,578
Other	public - state	17,818,045	17,818,045

Table 4 - Resources Made Available

Narrative

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

Identify the geographic distribution and location of investments

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

Table 5 – Identify the geographic distribution and location of investments

Narrative

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

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

Leveraging

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

ESG

In PY21, the state's ESG formula allocation made up 9.02% 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). In PY20 and PY21, grant recipients were required to provide a 100% cash match using non-Hearth Sources of Funds. As shown in CR-75, ESG Expenditures in PY21 grant recipients provided a match of \$830,072, which represents an increase of 22.4 percent when compared to PY19. In PY21, matching requirements came from other non-ESG HUD funds as well as state and local funds.

HOME

HOME applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. PY21 match was achieved using cash equivalents from non-federal sources and state bond programs.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$88,855,652
2. Match contributed during current Federal fiscal year	\$4,770,464
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$93,626,116
4. Match liability for current Federal fiscal year	\$0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$93,626,116

Table 6 – Fiscal Year Summary - HOME Match Report

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

Table 7 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
\$35,897.77	\$28,507.03	\$41,321	\$0	\$64,404.80

Table 8 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	3					3
Dollar Amount	\$25,948,220					\$25,948,220
Sub-Contracts						
Number	62			6	1	55
Dollar Amount	\$25,241,638			\$3,154,922	\$1,692,177	\$20,394,539

	Total	Women Business Enterprises	Male
Contracts			
Number	3	0	3
Dollar Amount	\$25,948,220	\$0	\$25,948,220
Sub-Contracts			
Number	62	3	59
Dollar Amount	\$25,241,638	\$2,247,646	\$22,993,992

Table 9 - Minority Business and Women Business Enterprises

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

Table 10 – Minority Owners of Rental Property

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

Table 21 – 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	220
Number of Non-Homeless households to be provided affordable housing units	585	1,001
Number of Special-Needs households to be provided affordable housing units	0	0
Total	731	1,221

Table 32 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	190	324
Number of households supported through The Production of New Units	63	300
Number of households supported through Rehab of Existing Units	478	701
Number of households supported through Acquisition of Existing Units	0	0
Total	731	1,325

Table 43 – Number of Households Supported

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

Rhode Island surpassed its goal for total household support in large part due to its increased rehabilitation rate compared to previous years. Rhode Island's traditionally low rental vacancy rate, which impedes lease up, has historically been one of the most significant contributors to the low voucher utilization rate. However, the number of households benefitting from affordable rent due to operating subsidies funded through the NOP program increased greatly in PY21. Shared jurisdiction between PHAs in the state continues to be explored to further promote voucher utilization, and legislation prohibiting discrimination on the basis of an individual's source of income was passed in April 2021.

Discuss how these outcomes will impact future annual action plans.

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

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

Number of Households Served	CDBG Actual	HOME Actual	HTF Actual
Extremely Low-income	407	25	72
Low-income	3,255	14	0
Moderate-income	407	22	0
Total	4,069	61	72

Table 54 – Number of Households Served

Narrative Information

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

35 HTF-assisted units are currently under construction. An additional 35 have received preliminary commitments.

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

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

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

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

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

The Rhode Island Continuum of Care (RiCoC) has a 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 PY21, the State's homelessness programming, as measured through the State Homeless Management Information Systems database, served 2,721 persons with emergency shelter and 182 persons with transitional housing. The Consolidated Homeless Fund and the Continuum of Care combine to fund 205 transitional housing units per year, with 52% 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 PY21 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. RI Housing, the Money Follows the Person (EOHHS) office and BHDDH have entered into memorandums of understanding to ensure services are available and that those who are high utilizers of Medicaid are served first. (See goals in SP-60 of the Consolidated Plan).

During PY2021 the RICoC partnered with RI Housing and the Providence Housing Authority to deliver the new Emergency Housing Voucher (EHV) Program created by the American Rescue Plan Act (ARPA). Through EHV, The Department of Housing and Urban Development (HUD) awarded

159 housing choice vouchers to the two Public Housing Authorities in order to assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability. The PHA were required to partner with their local continuum of care and leverage their CES for referrals into these EHV's.

During PY2021 the RCoC received a \$3.5M award from HUD's Youth Homeless Demonstration Program to develop and then fund a plan to end youth homelessness in Rhode Island. Planning commenced in Fall 2021, project selection occurred at the end of PY21, and the RCoC now look forward to those contracts being implemented in Fall 2022.

The RCoC provided technical assistance to 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.

2021 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, 420 households have been served and RIHousing will continue to build on these numbers in PY22, 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 facilitated the annual Landlord Appreciation and Resource Fair again in PY21. 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 148 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 2021, RIHousing had 18 families graduate from the program and disbursed \$136,011 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 the 2021 session, the General Assembly established two commissions to study barriers to housing development and how to address them. 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. These commissions met periodically in PY21 and received extensions from the General Assembly to continue their work into 2023. A representative of RIHousing sits on both commissions. Additionally, the General Assembly passed legislation to require all municipalities to have E-permitting procedures established for every step in the building/development process by July 1, 2023.

In PY21, Speaker Shekarchi announced a package of 11 bills aimed at supporting municipalities in meeting their affordable housing goals. Included in the package were bills to amend the Low- and Moderate-Income Housing Act and the State Housing Appeals Board (SHAB) to streamline the approval process for developers proposing to build affordable housing utilizing the comprehensive permit process. Another bill streamlined the process for approving accessory dwelling units (ADUs) and prohibited municipalities from imposing burdensome requirements on property owners seeking to create ADUs. One bill created a new Department of Housing headed by a newly appointed Secretary of Housing. An important focus of this new Department will be to coordinate housing initiatives across departments and agencies and identify opportunities to reduce barriers to development. Together, the bills in the Speaker's package will make it easier to develop affordable housing and will provide the state and municipalities with more tools to increase housing production. All but one of the bills was passed by the end of the session.

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. In PY21, the Housing Resources Coordinating Committee approved guidelines which allowed RIHousing to issue an RFP for the first \$20 million of these resources for housing production and operating support. The

remaining \$5 million from the initial capitalization is intended to be used for a municipal technical assistance program which will support municipalities in removing local barriers to housing production.

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 PY21, 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, which severely affected the state throughout PY19 and PY20, prompted the implementation of programs to address the needs of those impacted during the 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. Rent Relief RI, the state's flagship pandemic rental assistance program, was established at the end of PY20 with total funding \$352 million through the federal Emergency Rental Assistance Program to provide rental and utility relief payments to eligible renters and landlords. Applications for assistance were accepted until June 1, 2022 and, as of the end of PY21, \$214 million of this funding had been obligated, with the remainder to be disbursed into the beginning of PY22. The Homeowner Assistance Fund (HAF-RI) also came online in PY21 supported by \$50 million in federal American Rescue Plan Act resources awarded to the state by the U.S. Department of Treasury. HAF-RI, which accepted applications through March 14, 2022, offered up to \$50,000 per eligible household to assist with homeownership expenses including mortgage payments and arrearages, property taxes and fees, and payment assistance for utilities, insurance, and other related expenses. By the end of PY21, 421 households had been approved for assistance and a total of \$11.9 million had been obligated. This program will also continue to disburse funds into PY22.

At the end of the 2021 session, the General Assembly approved Governor McKee's "RI Rebounds" proposal, which allocated significant federal State Fiscal Recovery Funds (SFRF) for housing and homeless programs including \$15 million for the development of affordable housing, \$12 million for site acquisition, \$1.5 million for a homeless assistance program, and \$500,000 for OHCD predevelopment and capacity building to administer homeless programs.

The FY2023 budget built on that investment with a total allocation of \$250 million of SFRF resources for housing and homeless programs. This included \$21.5 million for a Homelessness Assistance Program designed to expand housing navigation, behavioral health, and stabilization services to address pandemic-related homelessness. The program will support operating subsidies for extremely low-income housing units and services for people transitioning from homelessness to housing, including individuals transitioning out of the adult correctional institutions. In addition, \$15 million was allocated to Homelessness Infrastructure to support the acquisition or construction of temporary or permanent shelter-based and/or housing-based solutions and wrap-around services.

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 residents.

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 2022, RIHousing has approved 145 units under this program, housing 43 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.

2021 Action

Under the requirements of the Homeless Emergency Assistance and Rapid Transition to Housing (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

2021 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.

2021 Action

In 2021, 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

2021 Action

Rhode Island continued to work towards reducing recidivism through the 9 Yards program, an intensive re-entry program with an experimental design, in PY21. The program has been sponsored since 2013 by OpenDoors, a private, Providence-based social service organization that helps inmates adjust to life after their release. 9 Yards 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. Studies show that 9 Yards participants recidivate back to prison less than those that did not participate in the program and contributes to the state's goal of preventing homelessness of recently released prisoners.

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.

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community-based and state service providers, receive clarification about probation and gain assistance with applications for public benefits.

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

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

RIHousing LeadSafe Homes Program (LSHP) is a Green and Healthy Homes model program that is able to produce comprehensive interventions that reduce lead hazards, address healthy homes hazards, and reduce energy consumption in a cost effective and efficient manner for families in the Program's at-risk target communities. While no set-asides exist within the regulations of the program, historical program data suggests that, in a given calendar year, 60% of funds go to multi-family projects, either owner-occupied or not, and 40% go to single family homeowners. As stated in the Strategic Plan, Goal 3 of the 2020-2024 Consolidated Plan is to improve the health, safety, and energy efficiency of all Rhode Island homes. In September 2019, RIHousing was awarded \$7,841,160 under a new High Impact Neighborhoods Demonstration grant for lead hazard remediation. The grant is targeted to areas with high concentrations of both pre-1940 housing, low-income families, and high rates of young children with elevated blood lead levels. RIHousing's grant will address lead hazards in four census tracts in Pawtucket and Central Falls. New LSHP systems were developed for effectively utilizing these funds in PY20. During PY21, a total of 31 units were remediated under the LeadSafe Homes Program.

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 18 families from the program in PY 2021 and disbursed a total of \$136,011 in FSS escrow funds. 148 families were enrolled in the program by the end of PY21, 36 of which 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.

2021 Action

In PY21, RIHousing continued providing \$10,000 in interest-free down payment assistance to eligible first-time homebuyers through their 10kDPA program which was initiated in 2020. During the program year, 699 loans totaling \$6,990,000 were issued through the program

The COVID 19 pandemic has threatened the housing stability of many homeowners and renters in Rhode Island. In response to the pandemic, numerous protections for homeowners and renters were granted by Congress and the Centers for Disease Control and Prevention (CDC). Included in these measures were 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 was available through the remainder of the COVID-19 pandemic, with forbearance requests granted under the CARES Act were accepted through the end of September 2021. The CDC's moratorium on evictions also continued to protect eligible tenants against eviction due to the nonpayment of rent until its expiration in August 2021. Additionally, several emergency assistance programs, including RentRelief RI and HAF-RI were administered by RIHousing in PY2021 with funding through the American Rescue Plan Act to help residents impacted by the pandemic remain in their homes. Both programs closed to new applicants in 2022 but will continue to disburse funds as they remain available into the next program year.

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

The coordination of State, Federal, and private resources improved access to housing and community development resources and focused these resources to high priority areas and initiatives. 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 PY21, 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 PY21, 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 2021. 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. Additionally the RICOC has Committees tasked with Governance, System Performance/Coordinated Entry System Oversight, HMIS, advancing equity, and addressing grievances. 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 RCoC 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 Assistant Chief of the Office of Housing and Committee Development is a member of the Continuum of Care Board. As a member of the Board, she 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.

Legislation passed by the General Assembly in PY21 created a new Department of Housing headed by a newly appointed Secretary of Housing. The Secretary's responsibilities include coordinating with all state agencies on housing initiatives and developing a state strategic housing plan. The legislation also tasks the Secretary with developing a housing organizational plan on or before November 1, 2022, that includes a review, analysis and assessment of functions related to housing of all state departments, quasi-public agencies, boards, and commissions. The bill specifies that the plan should include comprehensive options, including the advantages and disadvantages of each option and recommendations relating to the functions and structure of the new department of housing.

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

HUD Section 811 Project Rental Assistance Program

RIHousing, the Executive Office of Health and Human Services (EOHHS), and the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) will build on their strong

history of collaboration and Rhode Island's strong infrastructure and supportive service system to administer the HUD Section 811 PRA Program in Rhode Island.

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

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

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

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

The most recent analysis of impediments to fair housing choice (AI), entitled "State of Rhode Island Analysis of Impediments to Fair Housing Choice," 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 AI 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 AI also identified localized issues and offered recommendations for participating municipalities, including Cranston, East Providence, Pawtucket, and Providence.

Some of the actions taken in PY21 to address these impediments include:

- Historic investments in housing and homeless programs including the allocation of \$250 million in SFRF resources to increase the supply of affordable housing and reduce homelessness.
- Passage of Source of Income Discrimination legislation that adds lawful source of income to the categories protected under the State’s Fair Housing Law. As a result, landlords are no longer allowed to reject a tenant based on their lawful source of income. This protection is particularly important for tenants utilizing rental assistance who have historically faced significant discrimination by landlords.
- Increased funding for the State’s Livable Homes Modification Grant which provides funding for seniors and persons with disabilities to make accessibility improvements to their home which will allow them to age in place.
- A pilot program to begin September 1, 2022 that will make service free for a year on RIPTA’s R-Line, which connects Pawtucket and Cranston through downtown Providence and is the busiest line in the transit system, accounting for about half of RIPTA’s ridership.

Inadequate Supply of Affordable Housing:

In PY21, Speaker Shekarchi announced a package of 11 bills aimed at supporting municipalities in meeting their affordable housing goals. Included in the package were bills to amend the Low- and Moderate-Income Housing Act and the State Housing Appeals Board (SHAB) to streamline the approval process for developers proposing to build affordable housing utilizing the comprehensive permit process. Another bill streamlined the process for approving accessory dwelling units (ADUs) and prohibited municipalities from imposing burdensome requirements on property owners seeking to create ADUs. One bill created a new Department of Housing headed by a newly appointed Secretary of Housing. An important focus of this new Department will be to coordinate housing initiatives across departments and agencies and identify opportunities to reduce barriers to development. Together, the bills in the Speaker’s package will make it easier to develop affordable housing and will provide the state and municipalities with more tools to increase housing production. All but one of the bills was passed by the end of the session.

Governor McKee’s FY22 and FY23 budgets also included numerous initiatives to improve the stock of affordable housing in the state, including the establishment of a new restricted receipt fund to encourage housing production and the allocation of State Fiscal Recovery Fund (SFRF) resources for housing development, capacity building, and homelessness programs.

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.

The state's FY23 budget, which was approved by the House in June 2022, included a pilot program that offers free bus fare on the RIPTA R-Line, which accommodates more than half of all RIPTA riders, for one year. This program removes the financial barriers to mobility for many of the state's lower-income residents, promoting greater access to education, healthcare, and employment for those who need it most. RIPTA's free R-Line service program is scheduled to begin in September 2022, with a ridership report due to the Legislation by March 2024 for further evaluation of the program.

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. These study commissions met on a recurring basis in PY21 and received an extension to continue their work into 2023. In addition, the Lieutenant Governor has identified affordable housing as one of her top priorities and held a series of virtual community conversations aimed at identifying the housing challenges facing the State and the options for addressing those challenges. The prior year's community conversations resulted in the RI 2030 plan, which was released jointly by the Governor and Lieutenant Governor in PY21.

Housing construction increased in PY 21, and during the Spring and Summer of 2022, RIHousing and affordable housing developers have continued 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:

The permanent funding stream established under Governor McKee's FY22 budget, the Housing Production Fund, was projected 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. In PY21, the Housing Resources Coordinating Committee approved guidelines which allowed RIHousing to issue an RFP for the first \$20 million of these resources for housing production and operating support. The remaining \$5 million from the initial capitalization was used for a municipal technical assistance program which supports municipalities in removing local barriers to housing production.

The FY22 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.

At the end of the 2021 session, the General Assembly also approved Governor McKee’s “RI Rebounds” proposal, which allocated significant State Fiscal Recovery Fund (SFRF) resources for housing, including \$15 million for the development of affordable housing, \$12 million for acquisition of land or property for redevelopment as affordable housing, \$1.5 million for a homeless assistance program, and \$500,000 for OHCD predevelopment and capacity building. The FY2023 budget built on that investment with a total allocation of \$250 million of SFRF resources for housing and homeless programs. That included:

- \$100 million for the development of affordable housing
- \$25 million for site acquisition
- \$20 million for a middle-income housing development program
- \$10 million for a pre-development program
- \$25 million for a community revitalization program

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, 2021 through June 30, 2022, which correlates to Rhode Island's HUD Program Year 2021.

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 PY16. InspectCheck includes all required standards in §92.251(c), specifically regarding compliance with state and local building codes, accessibility, disaster mitigation, health and safety, lead-based paint, and all other standards listed under 24 CFR 982.401.

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

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

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

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

Site Visits Conducted

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

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

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

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

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

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

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

Timing of Inspections

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

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

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

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

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

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

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

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

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

Analysis of Monitoring Results

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

Physical Findings

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

Physical inspections resumed in February of 2022. Of the 94 developments inspected in PY21, there were 108 individual findings, approximately 56% were Health and Safety violations that required immediate action on the part of the owner. These properties had 24-48 hours to bring units back into compliance. Most common Health and Safety violations included: inoperable smoke detectors, blocked egress, and the improper storage of flammables/combustibles. All of these violations have been addressed and closed. 44% of findings were general to violations of UPCS/HQS and Rhode Island Property Maintenance Code. Typical violations include stained/damaged flooring, overgrown vegetation, cracked electrical faceplates with no exposed wires, and torn refrigerator gaskets/seals. Most of these findings have been satisfactorily addressed and closed shortly after the monitoring was conducted.

File Findings

File reviews occurred for 44 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; 32 files had Income/Asset findings and/or missing or incomplete information. There were 2 findings in relation to the over-charging of rents, 5 findings related to proper verification of student status, and 5 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 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 CHF 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 CHF contract.

- Charging only eligible costs to the program or project.
- Complying with other applicable laws, regulations and terms of the CHFP contract.
- Conducting the program in a manner that minimizes the opportunity for fraud, waste and mismanagement.

Management of Monitoring Activities

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

1. Desktop Review Monitoring - Desktop review monitoring is an on-going process of reviewing grantee performance that uses all available data in making judgements about grantee performance and is conducted by the CHF or the respective ESG entitlement community. Among the sources of information to be reviewed during a desktop review are:
 - Request for Reimbursement and back-up documentation provided
 - Audit Reports
 - Approved Applications
 - Quarterly/Progress Reports
 - Citizen and Client Complaints

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

2. On-Site Monitoring- In addition to desktop monitoring, CHF staff may conduct an on-site monitoring visit. These visits shall be conducted as necessary. Areas to be monitored may include, but are not limited to:
 - Project Progress
 - Overall Program Management
 - Shelter/Facility
 - Policies and Procedures (especially those relating to the ESG Program)
 - Contract Management
 - Financial Management
 - HMIS and Data Tracking
 - Client File Review
 - Record Keeping

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

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

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

4. Monitoring Results - Within 60 days after completion of monitoring, CHFP will send written correspondence to the sub recipient describing the results – in sufficient detail to clearly describe the areas that were covered and the basis for the conclusions. Each monitoring letter will include:
 - Date(s) of the monitoring.
 - Name(s) and title(s) of the CHFP staff person who performed the monitoring review.
 - A listing of the program activity areas reviewed (which, in most cases, will repeat the areas outlined in the notification letter to the participant).
 - A brief explanation of the reasons why an area specified in the notification letter was not monitored (e.g., time constraints, unanticipated problems arising in another area).
 - Monitoring conclusions (both positive and negative), supported by facts considered in reaching the conclusions.
 - Clearly labeled findings and concerns.
 - If there are findings, an opportunity for the sub recipient to demonstrate, within a time prescribed by HUD, that the participant has, in fact, complied with the requirements.
 - Due date of required action.
 - An offer of technical assistance, if needed, or a description of technical assistance provided during the monitoring.

HOPWA

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

CoC

The RICOc conducts its annual program monitoring exercise through its designated collaborative applicant agency, RIHousing. In PY2021, 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 RICoC Planner, and RICoC Board. A cumulative report identifying themes noticed during monitoring informs an annual training plan as is necessary for the RICoC to address areas for improvement.

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

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

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

In accordance with the Citizen Participation Plan, a posting was published in the Providence Journal and Noticias on September 9, 2022, 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, 2022. The public was informed through the public notice that the comment period for the draft CAPER would be open until September 24, 2022. No comments were received from the public during the 15 day period.

CR-45 - CDBG 91.520(c)

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

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

HOME site inspections were not conducted during most of this program year. COVID waivers suspended inspections from 4/2020 – 12/2021. They resumed in February of 2022 and have been completed within the allotted 180 days. On-site inspection data is attached.

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 in program income was expended in PY 2021 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)

31 HOME rental units and 0 homeownership units were completed in 2021. \$3,423,358 in total HOME funds was expended in the program year. 68 HOME units are currently under construction and 61 units have received preliminary commitments, all of which are part of LIHTC developments.

CR-56 - HTF 91.520(h)

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

Compliance with HTF allocation plan:

35 HTF-assisted units are currently under construction. An additional 35 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	72	0	0	72	0	72
Homebuyer	0	0	0	0	0	0

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

CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	1	0	0	0	0
Total Labor Hours	0	0	0	0	0
Total Section 3 Worker Hours	0	0	0	0	0
Total Targeted Section 3 Worker Hours	0	0	0	0	0

Table 66 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	0	0	0	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0	0	0	0
Direct, on-the-job training (including apprenticeships).	0	0	0	0	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0	0	0	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0	0	0	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0	0	0	0	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0	0	0	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0	0	0	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	75	0	0	0	0
Held one or more job fairs.	0	0	0	0	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0	0	0	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0	0	0	0
Assisted residents with finding child care.	0	0	0	0	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0	0	0	0
Assisted residents to apply for, or attend vocational/technical training.	0	0	0	0	0
Assisted residents to obtain financial literacy training and/or coaching.	0	0	0	0	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0	0	0	0
Provided or connected residents with training on computer use or online technologies.	0	0	0	0	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0	0	0	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0	0	0	0
Other.	0	0	0	0	0

Table 17 – Qualitative Efforts - Number of Activities by Program

Narrative

The CDBG, HOME, and HTF projects that were reported on in this CAPER were set up and funded prior to July 1, 2021 when compliance on the new Section 3 Regulation began.

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	401-222-6490
Extension	0
Fax Number	401-222-2083
Email Address	Michael.Tondra@DOA.RI.gov

ESG Secondary Contact

Prefix	Mrs.
First Name	ROSA
Last Name	FELIX-PICHARDO
Suffix	0
Title	Principal Housing Specialist
Phone Number	401-222-4892
Extension	0
Email Address	Rosa.Pichardo@DOA.RI.gov

2. Reporting Period—All Recipients Complete

Program Year Start Date	07/01/2021
Program Year End Date	06/30/2022

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 18 – Shelter Capacity

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

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

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	0	0	0

Table 19 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	383,016	296,933	329,282
Expenditures for Housing Relocation & Stabilization Services - Services	183,918	249,490	224,596
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	556,934	546,423	553,878

Table 20 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Essential Services	15,000	15,000	11,851
Operations	0	0	0
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	15,000	15,000	11,851

Table 21 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Street Outreach	0	0	0
HMIS	0	0	0
Administration	52,433	53,419	53,915

Table 22 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2019	2020	2021
	624,367	614,842	619,644

Table 23 - Total ESG Funds Expended

11f. Match Source

	2019	2020	2021
Other Non-ESG HUD Funds	60,000	0	170,000
Other Federal Funds	15,000	15,000	0
State Government	249,502	571,681	645,072
Local Government	0	0	15,000
Private Funds	49,281	0	0
Other	269,760	0	0
Fees	0	0	0
Program Income	0	0	0
Total Match Amount	643,543	586,681	830,072

Table 24 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2019	2020	2021
	1,267,910	1,201,523	1,449,716

Table 25 - Total Amount of Funds Expended on ESG Activities