

# STATE OF RHODE ISLAND

2024

## HUD Consolidated Annual Performance and Evaluation Report (CAPER)

September 2025



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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)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Program Year 2024 is the fifth and final 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 2024 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.

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 PY2024. 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)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

The below figures were taken from IDIS-generated reports, SAGE reports, and figures reported by RIHousing and the Department of Housing.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Develop and Preserve Affordable Housing	Affordable Housing Public Housing	CDBG: \$ / HOME: \$ / HTF: \$ / Tax Credits: \$4360000	Rental units constructed	Household Housing Unit	210	105	50.00%	42	105	250.00%
Develop and Preserve Affordable Housing	Affordable Housing Public Housing	CDBG: \$ / HOME: \$ / HTF: \$ / Tax Credits: \$4360000	Rental units rehabilitated	Household Housing Unit	2315	47	2.03%	463	47	10.15%
Develop and Preserve Affordable Housing	Affordable Housing Public Housing	CDBG: \$ / HOME: \$ / HTF: \$ / Tax Credits: \$4360000	Homeowner Housing Added	Household Housing Unit	35	0	0.00%	7	0	0.00%
Develop and Preserve Affordable Housing	Affordable Housing Public Housing	CDBG: \$ / HOME: \$ / HTF: \$ / Tax Credits: \$4360000	Homeowner Housing Rehabilitated	Household Housing Unit	15	0	0.00%	3	0	0.00%
Develop and Preserve Affordable Housing	Affordable Housing Public Housing	CDBG: \$ / HOME: \$ / HTF: \$ / Tax Credits: \$4360000	Direct Financial Assistance to Homebuyers	Households Assisted	0	0	0.00%	33	0	0.00%

Develop and Preserve Affordable Housing	Affordable Housing Public Housing	CDBG: \$ / HOME: \$ / HTF: \$ / Tax Credits: \$4360000	Housing for Homeless added	Household Housing Unit	105	0	0.00%	21	0	0.00%
Improve Health, Safety and Efficiency of all Homes	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HUD Lead and Healthy Homes: \$1688192	Rental units rehabilitated	Household Housing Unit	490	0	0.00%	3	0	0.00%
Improve Health, Safety and Efficiency of all Homes	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HUD Lead and Healthy Homes: \$1688192	Homeowner Housing Rehabilitated	Household Housing Unit	1055	104	9.86%	211	104	49.29%
Improve Health, Safety and Efficiency of all Homes	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HUD Lead and Healthy Homes: \$1688192	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	0	0	0.00%	374	0	0.00%

Non-Housing Community Development	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	75000	23,860	31.81%	15,330	23,860	155.64 %
Non-Housing Community Development	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3750	219	5.84%	750	219	29.20%

Prevent and End Homelessness	Homeless	HOME: \$ / ESG: \$ / Section 811: \$600000 / Supportive Housing Program: \$4244427 / CDBG Recovery Housing Program: \$1213710 / Consolidate d Homeless Fund: \$7208964 / HOPWA: \$ / RoadHome Rental Assistance: \$400000	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1250	162	12.96%	500	162	0.00%
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Prevent and End Homelessness	Homeless	HOME: \$ / ESG: \$ / Section 811: \$600000 / Supportive Housing Program: \$4244427 / CDBG Recovery Housing Program: \$1213710 / Consolidate d Homeless Fund: \$7208964 / HOPWA: \$ / RoadHome Rental Assistance: \$400000	Homeless Person Overnight Shelter	Persons Assisted	15000	378	2.52%	3000	378	0.00%
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Prevent and End Homelessness	Homeless	HOME: \$ / ESG: \$ / Section 811: \$600000 / Supportive Housing Program: \$4244427 / CDBG Recovery Housing Program: \$1213710 / Consolidate d Homeless Fund: \$7208964 / HOPWA: \$ / RoadHome Rental Assistance: \$400000	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	120	0	0.00%	0	0	0.00%
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Prevent and End Homelessness	Homeless	HOME: \$ / ESG: \$ / Section 811: \$600000 / Supportive Housing Program: \$4244427 / CDBG Recovery Housing Program: \$1213710 / Consolidate d Homeless Fund: \$7208964 / HOPWA: \$ / RoadHome Rental Assistance: \$400000	Homelessness Prevention	Persons Assisted	30	0	0.00%	1360	0	0.00%
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Prevent and End Homelessness	Homeless	HOME: \$ / ESG: \$ / Section 811: \$600000 / Supportive Housing Program: \$4244427 / CDBG Recovery Housing Program: \$1213710 / Consolidate d Homeless Fund: \$7208964 / HOPWA: \$ / RoadHome Rental Assistance: \$400000	Housing for Homeless added	Household Housing Unit	0	0	0.00%	24	0	0.00%
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Prevent and End Homelessness	Homeless	HOME: \$ / ESG: \$ / Section 811: \$600000 / Supportive Housing Program: \$4244427 / CDBG Recovery Housing Program: \$1213710 / Consolidate d Homeless Fund: \$7208964 / HOPWA: \$ / RoadHome Rental Assistance: \$400000	HIV/AIDS Housing Operations	Household Housing Unit	0	0	0.00%	50	0	0.00%
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Table 1 - Accomplishments – Program Year & Strategic Plan to Date

\*These rows do not yet include expenditure information.

**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 and public services are distributed to units of general local government

(UGLGs) to use to develop much-needed public facilities, services and infrastructure. CDBG is also allocated to housing rehabilitation. Priority needs 1, 2, 4, 6, and 7 are addressed by the distribution of these funds. In PY2024, \$5,425,811.80 were drawn to address public facilities, services, and infrastructure.

## 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	HTF
White	4,492	6	49
Black or African American	1,351	6	23
Asian	119	0	0
American Indian or American Native	38	0	1
Native Hawaiian or Other Pacific Islander	20	0	2
Black/African American & White	60	1	0
Other multi-racial	8,458	20	44
<b>Total</b>	<b>14,538</b>	<b>33</b>	<b>119</b>
Hispanic	8,475	9	119
Not Hispanic	6,063	24	0

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)

	HESG
American Indian, Alaska Native, or Indigenous	9
Asian or Asian American	2
Black, African American, or African	141
Hispanic/Latina/e/o	66
Middle Eastern or North African	0
Native Hawaiian or Pacific Islander	0
White	171
Multiracial	151
Client doesn't know	0
Client prefers not to answer	0
Data not collected	0
<b>Total</b>	<b>540</b>

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

### Narrative

CDBG totals were taken from the number of beneficiaries on the PR-03 CDBG Summary of Accomplishments for activities with funds drawn in program year 2024. Total HOME beneficiaries were reported according to the PR-23 HOME summary of accomplishments generated from IDIS. HTF beneficiary totals were calculated according to the percentages listed on the PR-103 HTF Beneficiary

Report and 119 total beneficiaries of units completed in the 2024 program year. All reports are attached to this submission.

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

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	5,322,678	6,601,534.00
HOME	public - federal	2,525,178	2,000,000
ESG	public - federal	1,425,488	1,155,081.58
HTF	public - federal	3,144,833	3,514,331
Section 811	public - federal	600,000	498,306
Supportive Housing Program	public - federal	4,244,427	3,604,710.17
Tax Credits	public - federal	4,360,000	8,822,224
Other	public - federal	10,510,866	5,436,515
Other	public - state	10,510,866	957,907

Table 3 - Resources Made Available

### Narrative

Rhode Island did not spend all resources made available across several programs, but these funds will roll over to the next program year. Other public- federal funds include ARP - \$4,750,000, Lead Initiatives - \$529,250, and Lead HH - \$157,265. Other public – state funds include Neighborhood Opportunities Program - \$601,046 and RoadHome - \$356,861.

### Identify the geographic distribution and location of investments

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

Table 4 – Identify the geographic distribution and location of investments

### Narrative

There are no target areas defines 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 higher 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 were 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 PY24, the state’s ESG formula allocation made up 5% of the funding for the Consolidated Homeless Fund, the remaining funding coming from a portion of the state’s Title XX Social Services Block Grant, entitlement community formula allocations of ESG funds, the state investments through a restricted receipt account (the real estate conveyance tax), State Fiscal Recovery Funds, and temporary federal ERA2 funding. In PY24, grant recipients were required to provide a 100% cash match using non-Hearth Sources of Funds.

### HOME

HOME applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. PY24 match was achieved using cash equivalents from non-federal sources and state bond programs.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	\$114,023,790.00
2. Match contributed during current Federal fiscal year	\$5,531,000.00
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$119,554,790.00
4. Match liability for current Federal fiscal year	\$840,070.74
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$118,714,719.26

**Table 5 – Fiscal Year Summary - HOME Match Report**

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
5868	07/21/2022	\$430,000.00						\$430,000.00
5931	12/14/2022	\$725,000.00					\$1,676,000.00	\$2,401,000.00
5860	03/11/2022	\$2,700,000.00						\$2,700,000.00

Table 6 – Match Contribution for the Federal Fiscal Year

**HOME MBE/WBE report**

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
\$114,113.78	\$58,208.72	\$30,023.98	\$30,023.98	\$142,298.52

Table 7 – Program Income

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Number	3	0	0	0	0	3
Dollar Amount	\$17,682,897	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>Sub-Contracts</b>						
Number	38	0	0	4	9	2
Dollar Amount	\$13,268,220	\$0.00	\$0.00	\$2,255,180	\$2,795,482	\$8,217,558
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Number	3	0	3			
Dollar Amount	\$17,682,897	\$0.00	\$17,682,897			
<b>Sub-Contracts</b>						
Number	38	2	36			
Dollar Amount	\$13,268,220	\$90,366	\$13,177,854			

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

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

**Table 9 – Minority Owners of Rental Property**

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

**Table 10 – Relocation and Real Property Acquisition**

## CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	45	0
Number of Non-Homeless households to be provided affordable housing units	848	256
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>893</b>	<b>0</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	333	0
Number of households supported through The Production of New Units	94	105
Number of households supported through Rehab of Existing Units	466	151
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>893</b>	<b>0</b>

Table 12 – Number of Households Supported

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

**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.

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

**the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>	<b>HTF Actual</b>
Extremely Low-income	247	17	117
Low-income	1,919	8	2
Moderate-income	70	8	0
<b>Total</b>	<b>2,236</b>	<b>33</b>	<b>119</b>

**Table 13 – Number of Households Served**

**Narrative Information**

Table 13 was populated using data from the PR-23 CDBG and HOME Summary of Accomplishments Reports and the PR-100 HTF Beneficiaries Report (Attached).

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

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

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

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

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

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

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

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

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

The Consolidated Homeless Fund and the Continuum of Care combine to fund 224 transitional housing units per year, with half of these homes being available to households with children. Transitional housing is intended to be a steppingstone for a household while they are securing their own homes. A case manager works with the household in transition to develop a case plan that has realistic outcomes, recognizes the strengths of the household and addresses barriers

to independent living, and develops action steps to make that transition. Case managers work with members of the household to attend financial literacy and other life-skills workshops that are available in the immediate area. Services available include referrals to community healthcare resources and assistance with obtaining health insurance. Some units of transitional housing include nurses and psychiatrists to address client needs for psychotropic medications and to monitor their health status. Applicants for funding to operate transitional housing include measurements of outcomes related to successfully transitioning clients to permanent housing, usually as percentages of clients that achieve increased income, secure permanent housing, or achieve goals as part of their individual service plans. The State and entitlement city ESG funds awards are coordinated to ensure all parts of the state can meet the emergency shelter, Rapid Rehousing and Street outreach needs of persons. Domestic Violence Shelter placements are available throughout the state. Rhode Island is committed to decreasing the length of stay in these facilities by expanding its rapid re-housing and permanent supportive housing programs through CoC and State Rental Assistance dollars and other local initiatives.

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

The State of Rhode Island assists low-income individuals and families avoid becoming homeless through the following methods.

### **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 the Executive Office of Housing. 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 support until the youth is 21.

### **Health Care**

A Memorandum of Agreement between the Dept. of Health (DOH) and the Executive Office of Housing dictates that hospital patients are not discharged into homelessness. Patients remain hospitalized until they are healthy enough to move on to housing and receive case

management support in developing a discharge plan. Discharge planners in assisted living facilities are trained to identify mainstream housing opportunities and to pair placements with long-term care services.

Rhode Island will transition eligible individuals who are in a qualified institutional setting for 90 days or more into a qualified community-based residence. At the end of the demonstration period a total of 520 Phase I Medicaid beneficiaries will be transitioned into the community. The demonstration will use a coordinated system of care to assist a participant transition into and to successfully remain in the community, with the appropriate support, so that they can experience more independence and a better quality of life.

### **Mental Health**

A MOA between the Dept. of Behavioral Healthcare, Developmental Disabilities, and Hospitals and the Executive Office of Housing dictates that patients of mental health institutions are not to be discharged into homelessness. BHDDH supports the Housing First model for client-centered permanent housing and funds new supportive housing for people with serious mental illness and disabilities through the Thresholds program.

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.

Thrive Behavioral Health, a statewide CMHC, gives PATH clients access to screening and diagnosis, as well as a wide range of other services, including habilitation and rehabilitation; community mental health; alcohol or drug treatment; staff training; case management; supportive and supervisory services in residential settings; referrals to health services, job training, education, and relevant housing services. Riverwood also directs Rhode Island's premier Housing First program, which provides priority access to permanent supported housing services for its PATH clients.

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

Supportive housing is a nationally tested approach to permanently break the cycle of homelessness by providing the chronically homeless with affordable housing and the wrap-around services that will allow them to live independent, stable and productive lives. In 2023 the Executive Office of Health and Human Services began the Rhode Island Pay for Success (PFS) Permanent Supportive Housing Pilot Program that aims to provide essential supportive services to Rhode Island residents who have a history of chronic homelessness and complex life circumstances, and to facilitate their placement into housing units. This program is unique in that it aims to transfer financial risk from government to new investors who provide up-front capital. If the Pay for Success program achieves its goals, government repays private investment plus a modest return. If it does not, private investors take the loss.

As part of the Rhode Island Coordinated Entry System partnership, the Rhode Island Coalition to End Homelessness manages the permanent housing placement of the program, once persons are in a shelter or are living on the street. In permanent supportive housing settings, residents sign leases, pay rent and care for their own apartments, which is an important first step for homeless households to regain the self-confidence needed to take control over their lives.

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

### **Actions taken to address the needs of public housing**

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

RIHousing has continued to operate the Centralized Waitlist Portal, with 19 agencies currently participating throughout the state. The Centralized Waitlist allows potential applicants to access one application for thirty-four project-based voucher wait lists and the wait list for eighteen housing choice voucher programs all from one online portal.

The 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 continued to host SMART landlord presentations and the second annual Landlord Appreciation and Resource Fair was held virtually last year. The quarterly landlord newsletter also remains active with the goal of further increase the population of landlords who participate in the HCV program by alerting the landlord community to a list of available resources.

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

RIHousing has served as Family Self Sufficiency (FSS) program coordinator for more than 30 years and currently has 139 participants actively enrolled in the program. Family Self Sufficiency (FSS) enables individuals and families who receive assistance through the Housing Choice Voucher Program (HCVP) to learn the fundamentals of money management and achieve economic independence. In 2024, RIHousing had 21 families graduate from the program and disbursed \$232,321 in Family Self Sufficiency (FSS) escrow funds.

### **Actions taken to provide assistance to troubled PHAs**

RIHousing is not considered a troubled PHA.

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

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

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

In the 2024 legislative session on February 27th, Speaker Shekarchi led the passage of a package of twelve housing related bills to address Rhode Island's ongoing housing crisis. Included in this package was a House-approved bill that aims to make development of new affordable housing easier. The bill encourages municipal planning boards to consider the community's need for affordable housing when reviewing projects. It recognizes that adding to the state's low—and moderate-income housing inventory must be a sustained effort by all municipalities and is critical to achieving the state's housing goals. The bill also makes numerous technical changes and reinstates as an optional step a master plan review as a first step a developer could take in the process of filing a comprehensive permit, so that they can design a development that is more likely to integrate feedback from the community. It also removes wetland buffers from the density calculation of developments proposed under the act, since they are not part of the calculation for conventional developments.

Governor McKee's FY24 budget included numerous initiatives aiming to improve the stock of affordable housing in the state, including \$21 million from State Fiscal Recovery funds for a new program that allows the Secretary of Housing to target projects, including \$4 million for transit-oriented development and \$4.3 million to be transferred to the Infrastructure Bank to support infrastructure necessary for housing development, such as road and utility connections. The House also approved, subject to an annual \$30 million cap, a Low Income Housing Tax Credit (LIHTC) program. The LIHTC program would provide a tax incentive for developers to expand subsidized housing options for low-income households. States that make LIHTC investments have been able to leverage additional federal resources and successfully close financing gaps needed to finalize development and start construction on new housing. The new program will award tax benefits to developers through a competitive process. The House approved \$45 million from State Fiscal Recovery funds to increase facility capacity for individuals experiencing homelessness, three times the current level. Along with the increased funding is a change that allows the money to be used for homelessness prevention and stabilization programs.

The State of Rhode Island and all Entitlement Communities also conducted an Analysis of Impediments to Fair Housing (AI). That analyzed current public sector policies that may present barriers to affordable and fair housing. Several goals intended to help address these barriers were created through this analysis.

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

Facilities and Services for Children in Need

RI DCYF is the primary agency tasked with ensuring that the State meet the needs of children and families. DCYF has received multiple grants to assist in moving toward a system of care that focuses on family-centered planning and community-based services as an alternative to more restrictive interventions for children and youth, which include the following housing and supportive services programs: Residential Treatment Programs (RTPs): These residential treatment programs are long term subacute psychiatric step down programs. RTPs are self-contained campus settings that provide an intensive level of casework, therapy and educational programs. Residential Counseling Centers (RCCs) and Staff Secure Group Homes: RCCs and staff secure group homes are community-based psychiatric hospital step-down and diversionary programs. These programs are designed to address the needs of Severely Emotionally Distressed (SED) youth and children within a continuum system of care approach. Services include on-site group, individual and family counseling, medication maintenance, psychiatric evaluations and case management. There is a high staff to resident ratio with overnight awake staff. Group Homes: Group homes provide placement for children and youth in a community – based facility that utilizes local schools and recreational and cultural services. Intensive mental health services are available and include a clinical level of service that is part of DCYF’s hospital diversion and step-down programming. Group homes are structured and supportive community-based living environments that prepare children and youth for reunification, foster care, and adult living. Therapeutic Foster Care: Specialized foster care programs provide professional support services to children, youth and foster parents. Individualized treatment is provided within a supportive and structured home environment. These programs help to foster positive relationship skills, ameliorate emotional conflicts related to attachment and development, and prepare youth for transition to home, long term foster care, adoption, adult living or other age and developmentally appropriate settings.

Persons with Disabilities

Rhode Island published the 2025-2030 Olmstead Plan for community review in February 2025. The plan identified six goals with tailored recommendations for each to help people with disabilities become more integrated into their communities. Goals in the plan include: 1) Focus on fixing the root causes of segregation and the factors that lead to individuals and families

being or feeling isolated in society; 2) Increase opportunities for people to live independently and be part of their communities, with a special focus on improving housing, transportation, and continuous access to utilities; 3) Make care networks stronger, especially for mental health services, and improve coordination between different systems to make sure people get the support they need without gaps or confusion; 4) Create fair opportunities and environments for people in places like work, school, and recreation; 5) Build stronger communities by supporting reentry, recovery, and engagement to make sure people feel connected and involved; and 6) Ensure good management, responsible use of resources, improved data collection and progress tracking, and continued planning to fully complete goals and agreements. The plan is intended to serve as a guide for executive and legislative branch decision-making on policy changes and investment strategies.

### The re-entry of discharged inmates into community settings

As individuals come closer to release from prison, they are assigned a discharge planner to work with the individual to create a transition plan. Transitional Services and Discharge Planning in the RIDOC also holds forums for those who are awaiting release to be informed of the services available to them by providers with providers able to answer questions. A variety of discharge planning services are available, including housing, mental health, health services, substance use disorder treatment, medically assisted treatment, youthful offender programming, etc. Agencies that work within the prison also provide post-release services and follow-up to ensure a successful re-entry into the community and to prevent further incarcerations.

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

Rhode Island's housing inventory is old; the median year a structure was built is the third oldest in the Country after only Washington, D.C. and New York. This means that, due to the widespread use of lead-based paint prior to 1978, the State's housing stock requires proper rehabilitation to mitigate lead-based paint hazards.

The RI Housing LeadSafe Homes Program (LSHP), is a program that is able to produce comprehensive interventions that reduce lead hazards and address healthy homes hazards, in a cost-effective and efficient manner for families in the program's at-risk target communities. Through LSHP, the state provides forgivable loans to property owners to cover the costs associated with addressing lead-paint hazards and other unsafe conditions.

Additionally, in August 2024, the Biden administration allotted \$336,000 of \$26 million in nationwide funding to Rhode Island to protect children from lead in drinking water in schools and childcare facilities. The funding is primarily for testing water taps, and coupled with the administration's Bipartisan Infrastructure Law, will allow for identification and replacement of lead pipes.

The Rhode Island Lead Poisoning Prevention Act and Regulations require all children younger than six years of age to be screened for lead poisoning according to the Department's Lead Screening and Referral Guidelines. Childcare providers and elementary schools are asked to document that children are screened prior to enrollment, and health insurers based in Rhode Island are required to cover lead screening analysis. All lead screening results are reported to the Department of Health and maintained in a database.

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

- **The Earned Income Tax Credit** provides a tax credit and/or refund to people who earn low to moderate wages. The payment can be received as part of the end-of-year tax filing and a portion can be received in the worker's weekly paycheck. Workers who qualify for the federal EITC also qualify for a state EITC which is a portion of the federal amount.
- **Property Tax Relief Circuit Breaker Program:** State-funded tax credit to senior and disabled homeowners and renters whose property taxes exceed between 3% and 6% of their household income. For renters, property tax is calculated at 20% of annual rent. The maximum credit is \$675 for tax year 2024.
- **HealthSource RI – Affordable Health Coverage:** HealthSource RI is the state's health insurance marketplace for Rhode Islanders, in which families and individuals with income below 400% of the federal poverty level (FPL) may be eligible for a tax credit from the federal government to help pay for enrolling in a health plan. The tax credit can be claimed at the end of the tax year when the person files their income tax return. It can also be received in advance each month to help pay the monthly premium to enroll in coverage. This is commonly called the Advanced Premium Tax Credit or "APTC". If income is below 250% FPL, the family or individual may also be eligible for cost-sharing subsidies which reduce the out-of-pocket costs incurred when the person uses health care. These include co-payments (e.g. for doctor visits and prescriptions), deductibles, and co-insurance.
- **Rite Care and Rite Share**, which provides comprehensive medical coverage through the Medical Assistance Program to pregnant women, children and their parents or caretaker relatives under HealthSource RI, with eligibility dependent on income.
- **Child Care Assistance Program, CCAP:** Pays for all or part of costs of childcare for children under the age of 13. Eligible families are those with less than 180% of the federal poverty level in which parent/caretaker relative is working at least 20 hours a week. Once a family is receiving CCAP services, they can continue to participate until income exceeds 261% FPL.
- **Governor's Workforce Board (GWB):** The Governor's Workforce Board is the primary policy-making body on workforce development matters. They provide a

variety of programs and services geared to assist employers, students, and other jobseekers with employment and training. Programs include apprenticeship initiatives and incentives, careers exploration grants, incumbent workers training grants, nursing facility training grants, Prepare RI (a variety of programs with the goal of preparing students for in-demand jobs), Real Jobs RI (a demand-driven workforce development initiative that works with a network of employers, training providers, and community organizations to address industries' workforce challenges), work immersion, and others

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. In 2024, the State had 21 families graduate from the program and disbursed over \$232,321 in Family Self Sufficiency (FSS) escrow funds for the graduates. \$14,007.97 was disbursed for current participants as FSS escrow interim disbursement funds. 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.

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

In April 2025, Governor Dan McKee introduced a budget amendment aimed at implementing the key recommendations put forward by the Rhode Island Executive Office of Housing in its Housing Organizational Plan Report, submitted to the General Assembly on December 31, 2024. These proposed legislative changes are designed to streamline the state's housing governance structure, optimize resources, and enhance coordination across agencies.

The final recommendation will establish the Rhode Island Executive Office of Housing as the Executive Office of Housing (EOH) with consolidated authority to lead statewide housing and homelessness strategy, drive interagency cooperation, coordinate financing to achieve strategic plan goals, and support municipalities in navigating systems and gaining technical assistance.

The Secretary of Housing will be the statutory chair of RIHousing, replacing the Director of the Department of Business Regulation. On the board of ex officio and appointed members. Two interagency councils will also be appointed to driver interagency coordination by reactivating the Interagency Council on Homelessness and creating an Interagency Council on Housing

Production and Preservation. An overarching Advisory Council on Housing and Homelessness will be formed, which includes the former HRC and Advisory Council to the Interagency Council, comprised of community members advocates, practitioners, impacted communities, and others. These changes in governance structure are initiated in the hopes of enhancing role clarity and reduced duplication of efforts, and driving meaningful coordination in policy, planning, and financing.

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

RIHousing, the Executive Office of Health and Human Services (EOHHS), and the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) have continued 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.

RIHousing, EOHHS and BHDDH have moved to pair the PRA program with the interdepartmental data matching of homelessness (HMIS) and Medicaid information and believe that the change is a particularly innovative, replicable model that could become a best practice for reducing homelessness and lowering Medicaid expenditures.

- 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

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

The most recent Analysis of Impediments to Fair Housing was completed in August 2025 and included the State of Rhode Island and each entitlement city, namely Cranston, East Providence, Pawtucket, Providence, Warwick, and Woonsocket. The AI outlines the impediments to Fair Housing in RI, including: Inadequate supply of affordable housing; Inadequate level of public transportation; Public opposition to new affordable housing; Inadequate funding level; Disparate outcomes in private mortgage lending; and Lack of publicly accessible Language Access Plan/Relocation plans. The Fair Housing action Plan that was created through the analysis of these impediments may be viewed at

[https://www.rihousing.com/wp-content/uploads/AI-RI Entitlements-FINAL.pdf](https://www.rihousing.com/wp-content/uploads/AI-RI_Entitlements-FINAL.pdf).

## **CR-40 - Monitoring 91.220 and 91.230**

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

HOME

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

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

This report covers July 1, 2024 through June 30, 2025, which correlates to Rhode Island's HUD Program Year 2024.

### Monitoring Procedures

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

The 2013 HOME Final Rule requires that all HOME units committed funding after 1/24/15 will be required to be reviewed under the new Uniform Physical Condition Standards (UPCS) on an ongoing basis; however, as of present HUD has not yet provided additional guidance on these standards. In the interim, RIHousing has adopted policies from its HTF program that cross-reference Housing Quality Standards (HQS), Uniform Physical Condition Standards (UPCS), and RI Property Maintenance Code into one tool. Effective October 1, 2024, the Uniform Physical Conditions Standards (UPCS) which was the inspection model used by RIHousing for our HOME inspections since 2016), were sunset by HUD and replaced with the National Standards for the Physical Inspection Real Estate (NSPIRE) inspection protocols. Effective March 1, 2025, RIHousing adopted the NSPIRE protocol for the HOME and HTF physical inspection protocol. Inspection reports are compiled based on either no findings or the type of finding (Health and Safety versus a Negative finding) within InspectCheck, a mobile inspection application adopted from our HOME program monitoring by the RIHousing compliance team.

If a property has findings during an inspection, a notice is issued to the owner to address repairs necessary to bring the unit up to the standard. Health and Safety findings must be repaired

within 24 to 48 hours while negative findings may be addressed within 30 days. Owners are expected to evidence repairs and report back to the Asset Manager. When necessary, additional follow up inspections are scheduled.

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

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

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

#### Site Visits Conducted

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

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

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

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

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

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

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

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

### Timing of Inspections

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

Monitoring is required to occur every 3 years, or more frequently if there is significant noncompliance or other risk factors. Dates of recent inspections can be viewed in Appendix A. These onsite monitoring visits include sample unit inspections and review of occupancy files to determine compliance report accuracy and adequate documentation as discussed in Section 3.8 “Monitoring” of RIHousing HOME Policies and Procedures Manual. Standard procedures of Asset Management & Compliance will be used, with attention to the HOME requirements summarized in this Section and in Section 5 “Ongoing Project Monitoring”.

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

There are 3 rating levels:

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

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

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

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

### Analysis of Monitoring Results

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

### Physical Findings

Of the 61 developments inspected in PY24, there were 77 individual findings, approximately 43% 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. 57% of findings were general to violations of NSPIRE/UPCS/HQS and Rhode Island Property Maintenance Code. Typical violations include stained/damaged flooring, 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 61 HOME-assisted rental projects. Key findings were addressed throughout the Program Year. RIHousing staff documented 48 files had Income/Asset findings and/or missing or incomplete information. There were 11 findings related to proper verification of student status, and 13 findings related to a missing or outdated HOME Lease Addendum.

RIHousing’s Interim Inspection/Monitoring Policy took effect on April 1, 2020 and remains in effect. All HOME file audits are performed remotely, and files are uploaded to the asset manager via SharePoint or Procorem. 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 (Procorem) that captures tenant information for all HOME Program assisted units. All HOME Program assisted properties will have 60 days from the date of the Program Bulletin announcing the annual HUD Published Rent to update the required household occupancy and demographic information using Procorem. 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 Procorem. 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.

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

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

The State updated its Citizen Participation Plan in 2025 in accordance with the new 2025-2029 5-Year Consolidated Plan cycle. In accordance with the Citizen Participation Plan, a posting was published in the Providence Journal and Noticias, which announced the comment period for the CAPER, which lasted 15 days. The public notice included details on what the Consolidated Annual Performance and Evaluation Report (CAPER) would contain, which it is drafted and submitted, and the dates for which the report covers. The public notice also included information on how to access a draft of the CAPER, which was made available online at Rhode Island Housing's and the State Department of Housing's website on September 15, 2025. The public was informed through the public notice that the comment period for the draft CAPER would be open until September 30, 2025.

**CR-45 - CDBG 91.520(c)**

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

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

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

The State does not have any active BEDI grants.

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

Not Applicable

## **CR-50 - HOME 24 CFR 91.520(d)**

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

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)**

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 [housingsearchri.org](http://housingsearchri.org) 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**

\$50,451.92 in program income was drawn in PY2024. HOME funds were used to complete 33 units of affordable rental housing. According to the PR23 HOME Summary of Accomplishments report, 17 of these tenants were Very Low Income, 8 were Low Income, and another 8 were Moderate Income. The majority (20 tenants) were multi-racial households.

**Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)**

33 HOME rental units were completed in 2024. As part of the 2025 Annual Action Plan, \$9,026,232.86 was allocated to producing and preserving 121 units of affordable housing, funded by a combination of CDBG, HOME, and HTF funds. The majority of multifamily production and preservation deals are also funded in part by 9% and 4% LIHTC. Over the 5 years that encompassed the 2020-2024 5-Year Consolidated Plan Cycle, 9% LIHTC contributed \$64,892 equity per unit and 4% LIHTC contributed \$64,897.

## 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.

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.

119 units of HTF-assisted affordable housing were constructed or rehabilitated in PY2024.

The below chart was completed with reference to the PR103 HTF Beneficiary report and the PR100 HTF Activity Status Report. The number of units completed includes all units from projects that contain HTF-assisted units.

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	98.8%	0	1.2%	119	0	119
Homebuyer	0	0	0	0	0	0

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

## CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	3	0	0	4
Total Labor Hours		138,686			175,056
Total Section 3 Worker Hours		24,522			24,522
Total Targeted Section 3 Worker Hours		2,710			2,710

**Table 14 – 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					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.		3			4
Provided or connected residents with supportive services that can provide direct services or referrals.					
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.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.					

**Table 15 – Qualitative Efforts - Number of Activities by Program**

## **Narrative**

Three HOME activities and four HTF activities were subject to Section 3 during this reporting period. They did not meet Section 3 benchmarks, but qualitative efforts were made to ensure program compliance.