

STATE OF RHODE ISLAND

2025-2029

HUD 5-Year Consolidated Plan and 2025 Annual Action Plan

May 2025



Executive Summary

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

1. Introduction

The 2025-2029 Rhode Island Consolidated Plan is mandated by the U.S. Executive Office of Housing and Urban Development (HUD) and requires the state to assemble in one document its plan to pursue goals for all Office of Community Planning and Development (CPD) programs, as well as for other housing and homelessness programs.

Accordingly, the Rhode Island Consolidated Plan describes the priorities and guidelines of the four federally funded CPD programs for which Rhode Island is a formula grantee, including: the Community Development Block Grant (CDBG) program, HOME Investment Partnerships (HOME) program, the National Housing Trust Fund Program (HTF) and the Emergency Solutions Grant (ESG) program.

The Rhode Island Executive Office of Housing will administer the CDBG and ESG programs. Rhode Island Housing (RIHousing) will administer the HOME and HTF programs. RIHousing is also the lead agency in the submittal of this Consolidated Plan.

The overall goal of CPD programs is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. The primary means towards this end is to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of affordable housing.

The Consolidated Plan serves the following functions:

- A planning document for the State, which builds on a participatory process among citizens, organizations, businesses, and other stakeholders;
- A submission for federal funds under HUD's formula grant programs;
- A strategy to be followed in carrying out HUD programs; and
- A management tool for assessing performance and tracking results.

A complete Consolidated Plan consists of the information required in 24 CFR §91.300 through §91.330, submitted in accordance with instructions prescribed by HUD.

The Rhode Island Consolidated Plan affirms the three national objectives of Title I of the Housing and Community Development Act of 1974, as amended, including activities which:

- Primarily benefit low-and-moderate income persons
- Aid in the prevention of slums and blight
- Alleviate conditions which pose a serious and immediate threat to the health and welfare of a community

Rhode Island anticipates receiving the following amounts in Program Year 2025; estimated projections for five years follow in parentheses:

- CDBG: \$5,755,637 (\$28.8 million)
- HOME: \$3,557,637.50 (\$17.8 million)
- ESG: \$743,402 (\$3.7 million)
- HTF: \$3,001,259.36 (\$15 million)

The Rhode Island Consolidated Plan also supports the objectives of the National Affordable Housing Act of 1990, including:

- Ensure that all residents have access to decent shelter
- Increase the supply of affordable housing
- Make neighborhoods safe and livable; expand opportunities for homeownership
- Provide a reliable supply of mortgage finance
- Reduce generational poverty in assisted housing

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Through the process of gathering input via citizen participation and via consultation with state housing stakeholders and other public agencies (described in The Process), as well as through the assessment of housing needs (described in Needs Assessment) and the analysis of housing market conditions (described in Market Analysis), the state has developed a set of priority needs and strategic goals that will guide the use of approximately \$65.3 million in CPD formula allocations from 2025 to 2029.

The priority needs identified include:

- Increase housing opportunities for low- and moderate-income households
- Preserve existing affordable housing
- End homelessness
- Adapt aged housing to fit residents' needs
- Eliminate lead hazards
- Make infrastructure improvements
- Make investments in public services and facilities

- Increase transitional housing for persons in recovery with substance abuse disorders
- Develop permanent supportive housing
- Remove barriers to fair and affordable housing

The strategic goals established to address the priority needs throughout the course of the 5-year planning cycle include:

- Develop and Preserve Affordable Housing
- Prevent and End Homelessness
- Improve Health, Safety and Efficiency of all Homes
- Address Non-Housing Community Development Needs

3. Evaluation of past performance

Ninety days after the close of the state’s HUD Program Year (July 1st through June 30th), the state submits the Consolidated Annual Performance Evaluation Report (CAPER); the CAPER for PY2024 is due for submission to HUD by September 28, 2025. The CAPER will include the accomplishments only for the 2025 program year.

During the 2020-2024 Consolidated Planning period, RIHousing and The Executive Office of Housing (then OHCD) have worked to produce safe and affordable housing for thousands of state residents while providing rental assistance and supportive services to thousands more. The 2020-2024 Consolidated Plan set a goal of 2,665 affordable homes developed or preserved. Through four of the five program years covered in that plan, 3,433 rental units have been developed or preserved along with 70 homeownership units added or rehabilitated and 202 units for the state’s homeless population.

Approximately 72,791 persons have been the beneficiaries of public facility or infrastructure improvements and public service activities. These funds were distributed to units of local government (UGLGs) to use to develop much-needed public facilities and infrastructure.

Approximately 6,894 persons experiencing or at risk of homelessness have been assisted through tenant base rental assistance/rapid rehousing, overnight shelters, the addition of overnight/emergency/ transitional housing beds, homelessness prevention efforts, or HIV/AIDS housing operations.

4. Summary of citizen participation process and consultation process

Throughout the Consolidated Plan development process in 2024-2025, the Executive Office of Housing and RIHousing undertook a comprehensive public outreach and engagement process, meeting with other public and private agencies to gather data and discuss the State’s housing and community development needs and priorities to be included in the Plan. Agencies consulted included health and social services agencies, public housing authorities, city and municipal representatives, and housing developers and providers. To encourage citizen participation, RIHousing and the Executive Office of Housing offered a variety of opportunities for citizens to participate in the planning process.

Documents were made available for review by the public through RIHousing’s website. The notice was published at least two (2) weeks before the actual hearing date in a general circulation newspaper, as well as a newspaper that primarily serves minority communities. The hearing was held at a time and place convenient to potential beneficiaries and accommodating persons with disabilities and non-English speakers. More detail regarding the State’s citizen participation and consultation efforts are provided in the Process section of this Plan.

5. Summary of public comments

Common themes that emerged during the public meeting and popup events include:

- The need for greater suitable affordable housing for seniors and the disabled population
- The need for more affordable housing in general
- The need for affordable childcare
- The need for transportation options to link people with jobs and services
- The need for more opportunity for homeownership

Please see the citizen participation appendix for a full description of comments received.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments received have been accepted.

7. Summary

RIHousing and the Executive Office of Housing are the agencies responsible for administering HUD’s CPD programs. The two agencies work together to develop and implement the Consolidated Plan every five years, which is a HUD-required document that is an application to receive formula allocations for housing programs. Throughout the development of this plan, RIHousing and the Executive Office of Housing completed an extensive outreach process to inform the drafting of both the 2025-2029 Consolidated Plan and 2025 Annual Action Plan. The

Needs Assessment (NA) and Market Analysis (MA) sections of this Consolidate Plan combined with this outreach to develop the Strategic Plan (SP), which put together the priority needs, goals, resources, and outcomes related to the State’s housing-related needs and conditions.

The Process

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	Rhode Island	Rhode Island State HFA - RIHousing
CDBG Administrator	Rhode Island	State of RI – Executive Office of Housing
HOME Administrator	Rhode Island	Rhode Island State HFA - RIHousing
ESG Administrator	Rhode Island	State of RI – Executive Office of Housing
HTF Administrator	Rhode Island	Rhode Island State HFA - RIHousing

Table 1 – Responsible Agencies

Narrative

The 2025-2029 Consolidated Plan was developed in partnership between RIHousing, which is the State’s quasi-public housing finance agency, and the Rhode Island Executive Office of Housing (RIEOH).

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(I)

1. Introduction

RIHousing and RIEOH recognizes that an effective public engagement process is a crucial element in identifying the current and future housing needs for a variety of household types and income levels across the State. Therefore, in addition to a quantitative analysis of various data sources, the planning process for this Consolidated Plan required a qualitative analysis in which extensive public outreach was conducted to identify affordable housing, fair housing, and community development needs.

The consultation process was conducted from June 2024 to June 2025. A project team comprised of members from RIHousing, RIEOH, and project consultants, and was created to be responsible for all of the public outreach efforts. The engagement process for the public outreach included:

- Two (2) surveys: one in English and one in Spanish
- A survey sent through CoC staff distributed to those experiencing or at risk of homelessness
- Ten (10) Stakeholder workshops
- Two (2) Additional Fair Housing-focused stakeholder meetings
- Two (2) pop-up engagements
- Four (4) initial public meetings
- Two (2) public meetings post draft Plan development
- Several one-on-one interviews with key stakeholders

Nearly 2,000 participants from across the State were directly engaged via the above-mentioned activities.

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

RIHousing and RIEOH consulted with a variety of key stakeholders in the preparation of the 2025-2029 Consolidated Plan to discuss issues and opportunities related to housing and community development needs, as well as fair housing issues. Individuals representing government and policymakers, nonprofit organizations, affordable housing providers, and other interested parties were invited to participate to ensure that as many points-of-view as possible were heard. Consultations were conducted through the following activities:

Communication Strategy

In May 2024, several communication aids were developed. A meeting flyer was developed for the ten stakeholder workshops and four initial public meetings. Stakeholders were notified via email of upcoming consultation workshops. Two Frequently Asked Questions (FAQ) documents were developed: one for the Analysis of Impediments to Fair Housing and one for the Consolidated Plan. Both FAQs were translated into Spanish.

Stakeholder Workshops and Interviews

To inform the development of the public outreach plan, ten stakeholder interviews were conducted in the end of May and beginning of June, 2024. Key findings from these interviews include:

- Funding for housing preservation is too limited.
- Zoning may limit the amount/types of housing that the area can have through density and parking requirements as well as the dominance of single-family housing.
- Many factors add to the cost of development, including land values, cost of materials, community resistance, and pre-development costs.
- More affordable housing is needed in general, but especially for seniors and those with disabilities, families, Extremely Low Income (ELI) persons.
- There should be more permanent supportive housing where the level of support can be increased or decreased depending on the person's specific level of need.
- More comprehensive case management services that coordinate with one another are needed.
- There are several sources of funding that provide home repairs for several different home repair issues. They should coordinate with one another through a comprehensive home inspection program wherein several sources can be pooled to address repair for a whole home.
- Lack of affordable transportation is a barrier to financial solvency where bus fares, cars, and maintenance are expensive.

A complete summary of all stakeholder meetings is attached in the citizen participation section of the Plan submission.

The State has also updated its Citizen Participation Plan (CPP) during the drafting of the 2025-2029 5-Year Consolidated Plan. The updated CPP went on display for public comment with the Consolidated Plan from May 27th to June 26th, 2025.

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

An abridged version of the general survey was provided to the CoC to be distributed via paper copies to several shelters to be taken and returned by those experiencing or at risk of homelessness. Through this survey, RIHousing and RIEOH were able to include the unique needs of this population into this Plan.

Several staff of the CoC and other organizations targeted toward or serving the needs of homeless persons attended one or several of the stakeholder sessions, including the Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH), Integra Community Care Network, Looking Upwards, Inc., etc.

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

Rhode Island’s Consolidated Homeless Fund (CHF) combines all ESG funds (state and entitlements), state funding for homelessness, and Title XX block grant funds into one program. A committee representing the state, ESG entitlement communities, the chair of the Housing Resources Commission, RIHousing and other relevant policy makers in homelessness set parameters for the CHF program’s funding and distribute awards. This committee relies on information provided by the RI CoC including: point-in-time statistics, HMIS performance reports, and subrecipient capacity reports. The CoC also aids in the development of performance standards and provides outcome evaluations of all Consolidated Homeless Fund providers via the System Performance Committee.

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

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

Consultations took place during the Stakeholder Workshops held between May 28-30th, June 3rd-6th, 2024 and January 9th, 2025. Topics and outcomes discussed as part of this outreach included: regulatory concerns and barriers to development; affordable housing, preservation of housing; housing for the homeless and special needs populations; healthy housing and healthy neighborhoods; extreme weather and climate change; community development; and poverty and access to employment and small business development opportunities.

The following table lists all agencies, groups and organizations that participated in these workshops.

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Crossroads RI	Services-homeless Services-Children Services-homeless	Housing Needs Assessment Homeless needs-chronically homeless Homeless needs - unaccompanied youth	This agency was consulted via in-person workshop.
Housing Works RI	Housing	Housing Needs Assessment Public Housing Needs Market Analysis	This agency was consulted via in-person workshop.
Neighborworks	Housing	Housing Needs Assessment Public Housing Needs Market Analysis	This agency was consulted via in-person workshop.
North Providence Public Housing Authority	PHA	Housing Needs Assessment Public Housing Needs Market Analysis	This agency was consulted via in-person workshop.

Pawtucket Central Falls Development	Housing	Housing Needs Assessment Market Analysis	This agency was consulted via in-person workshop.
Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH)	Services-healthcare Services-homeless needs	Housing Needs Assessment Homeless needs-chronically homeless Special needs-disability	This agency was consulted via in-person workshop.
Providence Public Housing Authority	PHA	Housing Needs Assessment Public Housing Needs Market Analysis	This agency was consulted via in-person workshop.
Rhode Island Coalition Against Domestic Violence	Services-survivors of domestic violence	Housing Needs Assessment Special needs-survivors of domestic violence	This agency was consulted via in-person workshop.
Rhode Island Coalition to End Homelessness	Services-Homeless needs	Housing Needs Assessment Homeless Needs	This agency was consulted via in-person workshop.
South Coast Fair Housing	Housing	Housing Needs Assessment Market Analysis	This agency was consulted via in-person workshop.

Integra Community Care Network	Services-healthcare Services-homeless needs	Housing Needs Assessment Market Analysis	This agency was consulted via in-person workshop.
Looking Upwards, Inc.	Special Needs - disability Services-homeless needs	Housing Needs Assessment Homeless needs- chronically homeless Special needs- disability	This agency was consulted via in-person workshop.
United Way RI	Services-education Economic development	Housing Needs Assessment Market Analysis Anti-Poverty Strategy	This agency was consulted via in-person workshop.
Women's Development Corporation	Services-employment	Housing Needs Assessment Market Analysis	This agency was consulted via in-person workshop.

Table 2 – Agencies, groups, organizations who participated

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

Broadband providers were not consulted for this plan because they did not answer the requests for input. FCC and other broadband reports were consulted for these sections. All other appropriate agency types, as specified through the state’s Citizen Participation Plan and 24 CFR Part 91.110, were consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Rhode Island Continuum of Care	The State's ESG funding combines with the Entitlement Communities' ESG funding and other sources to make up the Consolidated Homeless Fund. This fund is allocated toward efforts that work to end and prevent homelessness.
Rhode Island Broadband and Digital Strategic Plan	ConnectRI	Increasing the broadband coverage of RI to LMI persons.
Hazard Mitigation Plan	State of Rhode Island Emergency Management Agency	Increasing efficiency of all homes, developing disaster resilience.
State Housing Plan (Housing 2030)	RIEOH	Increase the availability of affordable housing statewide.
State of Homelessness 2023	Rhode Island Coalition to End Homelessness	Develop flexible housing resources to prevent and divert homelessness.

Table 3 – Other local / regional / federal planning efforts

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

RIHousing and RIEOH worked together to collectively identify the housing-related conditions and needs of the state and coordinated on strategies to improve conditions and meet these needs. Each agency/department, per its mission, has roles and responsibilities that are valuable in implementing the Consolidated Plan, while sharing the capacity to administer programming, provide technical assistance and deliver outcomes.

Input provided by other social-service and health-oriented state agencies, is vital to developing practical strategies to address special needs. Representatives from various state-level committees and working groups coordinate with RIHousing and RIEOH on a regular

basis, thus their participation in the implementation of the Consolidated Plan will result in continued collaborations on providing housing-based supports and services to Rhode Island's most vulnerable populations.

Housing and community development, while both integral to serving high need populations, is also a broad mechanism in growing the state's labor market and improving economic growth in general. Public investments in housing development, especially for households currently cost-burdened by housing costs, have a ripple effect throughout the local economy. Those constructing the homes as well as those living in these homes earn money that is immediately recycled back into the economy in the purchase of local goods and services. The merging of housing and economic development goals and strategies over the next five years will help to stimulate economic development while improving availability of safe and affordable housing.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

Summarize citizen participation process and how it impacted goal-setting

The citizen participation process consisted of a robust public outreach strategy between RIHousing and RIEOH to solicit input on issues and opportunities related to housing and community development across the state. This process consisted of two rounds of public meetings (6 total), pop-up events, resident surveys, and other online methods of soliciting public input. The majority of these efforts took place between May 28th 2024 and January 9th, 2025. In June 2025, the state held two additional public meetings and solicited feedback during the 30-day public comment period.

Surveys

A public survey was launched in May 2024 and was open until April 2025, available in both English and Spanish. The English survey received 1,890 responses, and the Spanish version received 38. There was also a survey provided to CoC staff to be distributed to shelters and taken on paper. This survey received 14 responses.

Public Meetings and Pop-up Events

As indicated above, RIHousing and RIEOH hosted two separate rounds of public meetings and events. The first round took place between June 10-12, 2024, and the second round occurred between June 2-3, 2025.

Round 1 – June 10-12, 2024

Approximately 50 people attended six public meetings held on June 10-12, 2024 in Woonsocket, Warwick, North Kingstown, Barrington, and Warren. The meeting format was open house with seven stations: mapping exercise, fair housing activity, community asset activity, cardstorming activity, survey station, budget activity, and a station that solicited input on issues and potential solutions.

The pop-ups included the frequently asked questions handout, the survey promotion, and the budgeting exercise. Please see the citizen participation index for the full description of the public meetings.

Round 2 – June 9-10, 2025

RIHousing and RIEOH hosted a second round of public meetings that took place in Newport and Warwick. The primary purpose of the public meetings was to provide an opportunity for stakeholders and residents to review and comment on the draft recommendations to be included in the Consolidated Plan. Each meeting was scheduled for 90 minutes and included a project presentation. Approximately 15 members of the public attended the two meetings. A summary of the Plan projects was given in a presentation, which was followed by a discussion session. A complete summary of the comments provided in this public meeting are included in the citizen participation appendix.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Survey	General Public	Online resident survey collected 1,890 English responses and 38 Spanish responses.	Respondents expressed the need for more affordable housing for homeowners and renters, especially for the elderly.	N/A	https://www.surveymonkey.com/r/RIH2024 https://www.surveymonkey.com/r/RIH2024-S
2	Survey	Persons experiencing or at risk of homelessness	14 responses	Respondents expressed the need for more housing and supportive services.	N/A	N/A
3	Initial Public Meetings	General Public	There were approximately 50 participants.	Please see citizen participation index.	N/A	N/A
4	Additional Public Meetings	General Public	There were approximately 15 participants.	Please see citizen participation index.	N/A	N/A

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Pop-up Meetings	General Public	There were approximately 10 participants.	Please see citizen participation index.	N/A	N/A

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment examines needs related to affordable housing, special needs housing, community development, and homelessness throughout the state.

Throughout this section, the following issues have been identified and discussed:

Housing

Housing problems include cost burden (paying more than 30% of monthly income towards monthly housing costs), severe cost burden (paying more than 50% of monthly income towards monthly housing costs), overcrowding, and low-quality housing stock. The most common housing problem is cost burden. Hispanic, Black, and Asian households experienced these problems at disproportionately high levels. Seniors also represented a higher percentage of households with cost burdens.

Disproportionately Greater Need

HUD defines a disproportionately greater housing need when a particular group of people experiences housing problems at a rate greater than 10% more than for the income level as a whole. Disproportionately greater need was identified among the following groups experiencing one or more housing problems:

- Asian households with 50-80% AMI

Additionally, disproportionately greater need was identified among the following households experiencing one or more severe housing problems:

- Asian households with 0-30% and 50-100%AMI
- Hispanic households with 80-100% AMI

Homeless

The State's homeless population increased by 131% between 2019 and 2024 according to the PIT counts for both years.

In 2024, 877 are sheltered and 534 are unsheltered. Of individuals experiencing homelessness in the Rhode Island CoC, 936 (38.3%) are chronically homeless, 130 (5.3%) are veterans, 27 are persons with HIV/AIDS (1.1%), 986 (40.4%) are severely mentally ill, and 524 (21.4%) are suffering from chronic substance abuse. Individuals and households that were sheltered in hotels and other non-congregate settings on the night of the PIT are included in the sheltered count above.

Non-Homeless Special Needs Populations

Individuals with special needs but are not homeless include the elderly and frail elderly needing assistance to modify their homes to age-in-place; persons with HIV and AIDS needing better collaboration between existing providers and services to assist those who are living longer; and victims of domestic violence needing safe and secure housing.

Non-Housing Community Development

Non-housing community development needs were identified by the stakeholders and a public survey with over 1,800 responses, including improvements to senior centers, park and recreation facilities, neighborhood facilities, street resurfacing, sidewalk replacement; water and sewer improvements; economic development assistance; and public services such as senior services and homeless prevention services.

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

The Housing Needs Assessment is based on data provided by HUD through the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data, with supplemental data used when available. Although the CHAS is dated, it provides a glimpse of the housing needs throughout the state of Rhode Island.

Rhode Island's housing needs can be summarized as the need to develop more affordable housing to alleviate the pressure on low-income households that face housing cost burden; and the need to preserve the assisted housing options currently in operation. Actual performance expectations related to these needs are outlined in the Strategic Plan section of this Consolidated Plan and are tied to the expected resources available to develop and preserve affordable housing.

Supplemental tables throughout the remainder of this section will be labeled as supplemental and use data from the ACS 2023 5-year Estimates, which is the most recent year for which data is available.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	1,053,665	1,056,138	0.23%
Households	410,600	412,028	0.34%
Median Income	\$54,902	\$61,043.00	11.1%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Supplemental Table 1 Change in Demographics from 2018 – 2023

Demographics	2018	2023	% Change
Total Population	1,056,611	1,095,371	3.67%
Households	410,885	436,902	6.33%
Family Households	255,666	269,437	5.39%
Median Family Household Income	\$99,711	\$109,979	10.30%
Non-Family Households	155,219	167,465	7.89%
Median Non-Family Household Income	\$43,821	\$49,005	11.83%

Source: ACS 5-Year Estimates 2018 and 2023

2018 dollar estimates in this table are adjusted for inflation to 2023 dollars.

Statewide population growth in Rhode Island was very slight (3.67%) between 2018 and 2023. This is slightly above the national population growth rate (2.37%) during the same time period.

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	64,965	48,230	64,635	37,190	197,010
Small Family Households	17,090	15,435	22,700	14,660	104,265
Large Family Households	2,355	2,940	3,840	2,705	13,955
Household contains at least one person 62-74 years of age	12,630	10,175	15,620	8,545	45,965
Household contains at least one person age 75 or older	12,080	11,415	10,405	4,495	14,225
Households with one or more children 6 years old or younger	8,485	7,740	8,770	5,035	16,875

Table 6 - Total Households Table

Data Source: 2016-2020 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	1,060	845	830	225	2,960	125	135	150	90	500
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	370	455	335	255	1,415	15	25	35	70	145
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,020	545	640	370	2,575	40	235	325	255	855
Housing cost burden greater than 50% of income (and none of the above problems)	25,035	8,285	1,300	25	34,645	10,490	7,525	6,800	1,725	26,540

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	6,625	12,415	11,330	1,885	32,255	1,825	6,025	11,210	7,365	26,425
Zero/negative Income (and none of the above problems)	4,790	0	0	0	4,790	1,070	0	0	0	1,070

Table 7 – Housing Problems Table

Data 2016-2020 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	27,480	10,130	3,105	870	41,585	10,670	7,920	7,305	2,140	28,035
Having none of four housing problems	18,430	19,755	27,795	13,410	79,390	2,520	10,425	26,430	20,775	60,150

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	4,790	0	0	0	4,790	1,070	0	0	0	1,070

Table 8 – Housing Problems 2

Data 2016-2020 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	11,470	8,770	4,740	24,980	2,085	3,960	7,145	13,190
Large Related	1,885	1,515	500	3,900	190	910	1,405	2,505
Elderly	8,455	5,460	3,025	16,940	7,610	7,395	6,090	21,095
Other	11,800	6,480	4,780	23,060	2,520	1,615	3,630	7,765
Total need by income	33,610	22,225	13,045	68,880	12,405	13,880	18,270	44,555

Table 9 – Cost Burden > 30%

Data 2016-2020 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	9,895	2,960	370	13,225	1,930	2,500	2,540	6,970
Large Related	1,460	210	20	1,690	165	635	310	1,110
Elderly	5,630	2,935	485	9,050	6,150	3,525	2,590	12,265
Other	9,520	2,710	435	12,665	2,320	1,075	1,450	4,845
Total need by income	26,505	8,815	1,310	36,630	10,565	7,735	6,890	25,190

Table 10 – Cost Burden > 50%

Data 2016-2020 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	1,200	965	735	365	3,265	80	210	285	240	815
Multiple, unrelated family households	175	55	155	180	565	0	60	69	85	214
Other, non-family households	85	55	130	80	350	0	0	10	0	10
Total need by income	1,460	1,075	1,020	625	4,180	80	270	364	325	1,039

Table 11 – Crowding Information

Data 2016-2020 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	6,225	4,910	5,640	23,945	825	1,640	3,665	29,600

Table 12 – Households with Children Present by Income

Data 2016-2020 CHAS
Source:

Describe the number and type of single person households in need of housing assistance.

In the tables above, the “Other” category is made up of non-family households and single person households. Nonfamily households are households with individuals living together that are unrelated (this does not include married partners).

There are 30,825 single person and non-family households in Rhode Island that have a cost burden that exceeds 30%. Of that amount, 17,510 single person and non-family households have a cost burden exceeding 50%. Most cost-burdened households are renters, making up nearly 75%. Similarly, there are 360 non-family households who live in overcrowded units (more than 1 person per room).

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Adequately addressing the housing needs of persons with disabilities, including the need for affordable housing, remains a challenge in Rhode Island. In general, renter households that include members with disabilities are more likely than all other households to have very low incomes, experience worst-case housing need, pay more than 50% of their income for rent, and have other housing problems such as living in unsuitable or overcrowded housing. According to 2019-2023 ACS, 13.6% of the Rhode Island population has a disability. The three largest disability groups include persons with an ambulatory difficulty (64,580), cognitive difficulty (60,686), and an independent living difficulty (52,311).

The Rhode Island Coalition Against Domestic Violence (RICADV) is an organization dedicated to ending domestic violence by providing support and assistance to domestic violence agencies in Rhode Island. According to the [RICADV 2023 Annual Report](#), there were 9,362 individual survivors of domestic violence who received help and services, including 278 adults and children who stayed in shelter/safe homes and 58 adults and children who lived in transitional housing.

What are the most common housing problems?

The most common housing problem in Rhode Island is housing cost burden, particularly for those with housing cost burdens greater than 50% of income. The State’s high cost of rental and high home values are a key contributing factor to the housing problem. A greater number of renter-occupied homes are cost burdened than owner-occupied homes (Note: Rhode Island is 63.3% owner occupied and 36.7% renter-occupied.) About 36.8% of the housing units in the State were built before 1940. An older housing stock generally indicates a need for more maintenance and housing rehabilitation to maintain quality housing conditions. In addition to

cost burden and age, a large number of households were experiencing at least one type of housing problem, including overcrowding, lack of kitchen and/or lack of bathroom facilities.

Are any populations/household types more affected than others by these problems?

The percentage of households experiencing cost burden or severe cost burden is generally highest for the lowest income brackets (0-50% AMI) and decreases as income increases. Elderly owner-occupants and small related households, whether owner- or renter-occupied, comprise the majority of those who experience cost burden and severe cost burden.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

No specific data is available on the characteristics and needs of low-income individuals and families with children who are currently housed but are at imminent risk of homelessness. However, it can reasonably be assumed households that are already cost-burdened and have low incomes are going to be the first to be forced from the housing market by escalating housing costs. Those threatened with eviction, unemployment, foreclosure, or termination of utilities could become homeless when they no longer have a cushion against the rising costs of living. Some working poor families may only be able to pay the rent because they have two wage earners, or because the primary wage earner works two jobs. Other families may deal with the problem of high housing costs by doubling up. Stakeholders also reported that seniors can be at risk when they cannot keep up with their property taxes. Such arrangements can be unstable and temporary in nature. Stakeholders repeatedly identified transition-age youth as a population at-risk of homelessness, including but not limited to those aging out of the foster care system.

Most commonly, “at-risk” families live paycheck to paycheck without any savings for emergencies. If a family experiences a lost paycheck, a small rent increase, one incident of mental or physical illness, or a temporary layoff from work, it can result in a loss of housing. A common scenario is eviction from rental housing due to nonpayment of rent. Unemployment or underemployment results in a lack of sufficient income to meet the costs of food, housing, transportation, and childcare.

Additionally, individuals or families who fall into one or more of the following categories are most likely to become homeless:

- Persons leaving institutions such as mental hospitals or prisons
- Young adults aging out of the foster care system
- Households with incomes less than 30% of the median family income

- Households paying in excess of 50% of income for housing costs
- Survivors of domestic violence
- Special needs populations such as persons with AIDS, disabilities, mental and behavioral health needs
- Single parent households who are unemployed
- Large low-income families
- Renters facing eviction
- Homeowners facing foreclosure
- Households with catastrophic medical expenses
- Households experiencing physical hardships, i.e. flooding or fire

Formerly homeless persons who receive rapid re-housing assistance, and are nearing termination of their funds, are at risk for homelessness. However, this risk is reduced by case management, budget counseling and other social services that are offered to address risks to stability during the time they received funding.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Rhode Island has not adopted a specific definition of at-risk groups. However, the definition of at-risk homeless populations found at 24 CFR Part 91.5 is included below:

An individual or family who:

- (i) Has an annual income below 30% of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter; and
- (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Like the issue outlined above, the primary housing characteristics linked to instability and increased risk of homelessness are high housing costs and limited supply of affordable housing units.

Discussion

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines a disproportionately greater housing need when a particular group experiences housing problems at a rate over 10 percentage points more than that of the corresponding income level as a whole. The data table below summarizes the percentage of each group experiencing housing problems by HUD Adjusted Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI. Housing problems include:

- Housing units lacking complete kitchen facilities and/or complete plumbing facilities
- Overcrowding (more than one person per room)
- Housing costs greater than 30% of income (i.e., cost burden)

In general, the percentage of households with a housing problem is highest for the lowest income brackets (0-50% AMI) and decreases as income increases. According to the above definitions, only Asian households between 50% and 80% AMI in Rhode Island experience one or more housing problems at a disproportionate level (highlighted in the chart below).

Supplemental Table 2 Percent of Households with Housing Problems by Income and Race

	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
Race	% with one or more housing problems			
White	75.7%	70.2%	46.3%	27.2%
Black/ African American	73.2%	81.6%	39.0%	16.0%
Asian	77.3%	77.5%	65.5%	28.2%
Hispanic	68.0%	77.4%	42.2%	27.3%
Jurisdiction as a Whole	73.6%	72.2%	45.4%	26.2%

Source: CHAS 2015-2020

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	47,103	16,905	0
White	30,676	9,860	0
Black / African American	3,894	1,429	0
Asian	1,358	399	0
American Indian, Alaska Native	189	169	0
Pacific Islander	15	0	0
Hispanic	9,352	4,399	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	34,773	13,382	0
White	23,993	10,177	0
Black / African American	2,569	579	0
Asian	527	153	0
American Indian, Alaska Native	139	160	0
Pacific Islander	65	0	0
Hispanic	6,620	1,934	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	30,603	36,754	0
White	22,797	26,404	0
Black / African American	1,486	2,325	0
Asian	932	491	0
American Indian, Alaska Native	8	160	0
Pacific Islander	105	0	0
Hispanic	4,760	6,529	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,601	29,807	0
White	8,336	22,286	0
Black / African American	375	1,964	0
Asian	357	907	0
American Indian, Alaska Native	0	75	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	50	0
Hispanic	1,378	3,664	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

Nearly three-quarters of all residents of Rhode Island earning between 0% and 50% of AMI are suffering from at least one housing problem, including lack of plumbing/kitchen facilities, overcrowding, or cost burden. Asian households (3.5% of total households) in Rhode Island earning 50-80% AMI are disproportionately represented among households that are subject to housing problems. Black/African American households earning between 30-50% AMI also have a higher percentage of households above the jurisdiction as a whole with housing problems, but this category does not meet the standard of 10% higher in order to be considered “disproportionate.” Generally, as income increases, the prevalence of housing problems decreases.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines a disproportionately greater housing need when a particular group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. The data table below summarizes the percentage of each group experiencing housing problems by HUD Adjusted Mean Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI. Severe housing problems include:

- Housing units lacking complete kitchen facilities
- Housing units lacking complete plumbing facilities
- Overcrowding (more than 1.5 persons per room)
- Housing costs greater than 50% of income (i.e., cost burden)

According to the above definitions, the following groups experience one or more severe housing problems at a disproportionate level (this is also highlighted in the chart below):

- Asian households with 0-30% and 50-100%AMI
- Hispanic households with 80-100% AMI

Supplemental Table 3 Percent of Households with Severe Housing Problems by Income and Race

	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
Race	% with one or more severe housing problems			
White	59.5%	34.7%	12.4%	5.7%
Black/ African American	59.9%	38.0%	7.4%	1.1%
Asian	72.9%	34.8%	29.0%	11.4%
American Indian, Alaska Native	0.0%	0.0%	0.0%	0.0%
Pacific Islander	0.0%	0.0%	0.0%	0.0%
Hispanic	52.8%	32.6%	11.8%	8.6%
Jurisdiction as a Whole	58.4%	34.4%	12.2%	5.8%

Source: CHAS 2015-2020

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	37,348	26,657	0
White	24,116	16,407	0
Black / African American	3,190	2,133	0
Asian	1,278	474	0
American Indian, Alaska Native	154	204	0
Pacific Islander	15	0	0
Hispanic	7,251	6,494	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	16,571	31,564	0
White	11,848	22,279	0
Black / African American	1,199	1,955	0
Asian	239	448	0
American Indian, Alaska Native	85	214	0
Pacific Islander	40	25	0
Hispanic	2,790	5,764	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,240	59,148	0
White	6,110	43,112	0
Black / African American	284	3,534	0
Asian	414	1,016	0
American Indian, Alaska Native	0	169	0
Pacific Islander	0	105	0
Hispanic	1,330	9,964	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,364	38,052	0
White	1,734	28,872	0
Black / African American	25	2,304	0
Asian	144	1,115	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	0	75	0
Pacific Islander	0	50	0
Hispanic	435	4,608	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

According to the above definitions, the following groups experience one or more severe housing problems (lack of complete kitchen/plumbing facilities, overcrowding, severe cost burden) at a disproportionate level:

- Asian households with 0-30% and 50-100%AMI
- Hispanic households with 80-100% AMI

Nearly 60% of all residents earning between 0-50% of AMI experience severe housing problems. Generally, as income increases, the prevalence of severe housing problems decreases.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines a disproportionately greater housing need when a particular group experiences housing problems at a rate 10 percentage points higher than that of the corresponding income level as a whole. Cost-burdened is defined as paying more than 30% of household income on housing, and severely cost burdened is defined as paying greater than 50% of household income on housing.

The data table below summarizes the percentage of each particular group experiencing cost burden at various levels. Based on these definitions, Asian residents with no/negative income reported experience cost burden at a disproportionate level, although the percentage is very small. Asian residents at less than 30% AMI experience the most cost burden (highlighted in the chart below).

Supplemental Table 4 Cost Burden by Severity and Race

	Less than 30% (No Cost Burden)	30-50%	More than 50%	No/ negative income (not computed)
Race	% with housing cost burden			%
White	70.5%	16.4%	13.1%	0.8%
Black/ African American	58.7%	21.7%	19.6%	1.3%
Asian	73.1%	12.1%	14.8%	3.6%
Hispanic	57.3%	23.4%	19.3%	1.7%
Jurisdiction as a Whole	68.2%	17.4%	14.4%	1.1%

Source: 2016-2026 CHAS

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	279,784	71,482	58,938	4,395
White	224,734	52,216	41,715	2,542

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Black / African American	12,158	4,498	4,060	274
Asian	7,875	1,299	1,592	389
American Indian, Alaska Native	685	121	224	115
Pacific Islander	95	130	55	0
Hispanic	28,597	11,658	9,627	834

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2016-2020 CHAS
Source:

Discussion

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The impact of housing problems in Rhode Island varies primarily by income level. However, the following income tiers experienced problems at a rate of at least ten percentage points higher than the State as a whole:

Housing Problems

- Asian households between 50% and 80% AMI

Severe Housing Problems

- Asian households with 0-30% and 50-100%AMI
- Hispanic households with 80-100% AMI

Cost Burden

- Asian residents with no/negative income (small sample size)

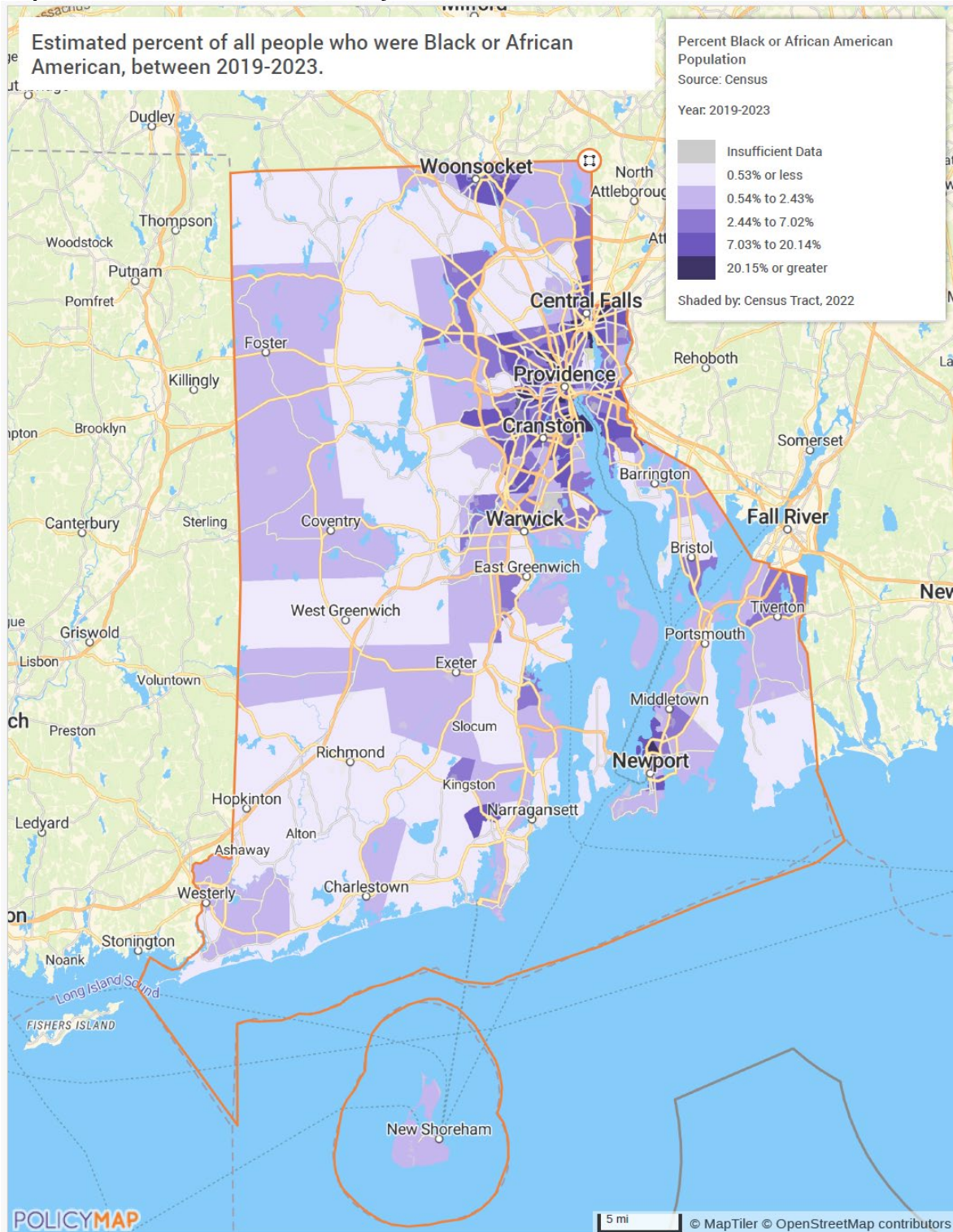
If they have needs not identified above, what are those needs?

The needs among race/ethnicities are indicated above. Income categories have more general needs as described in NA-10 and the Housing Market Analysis.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

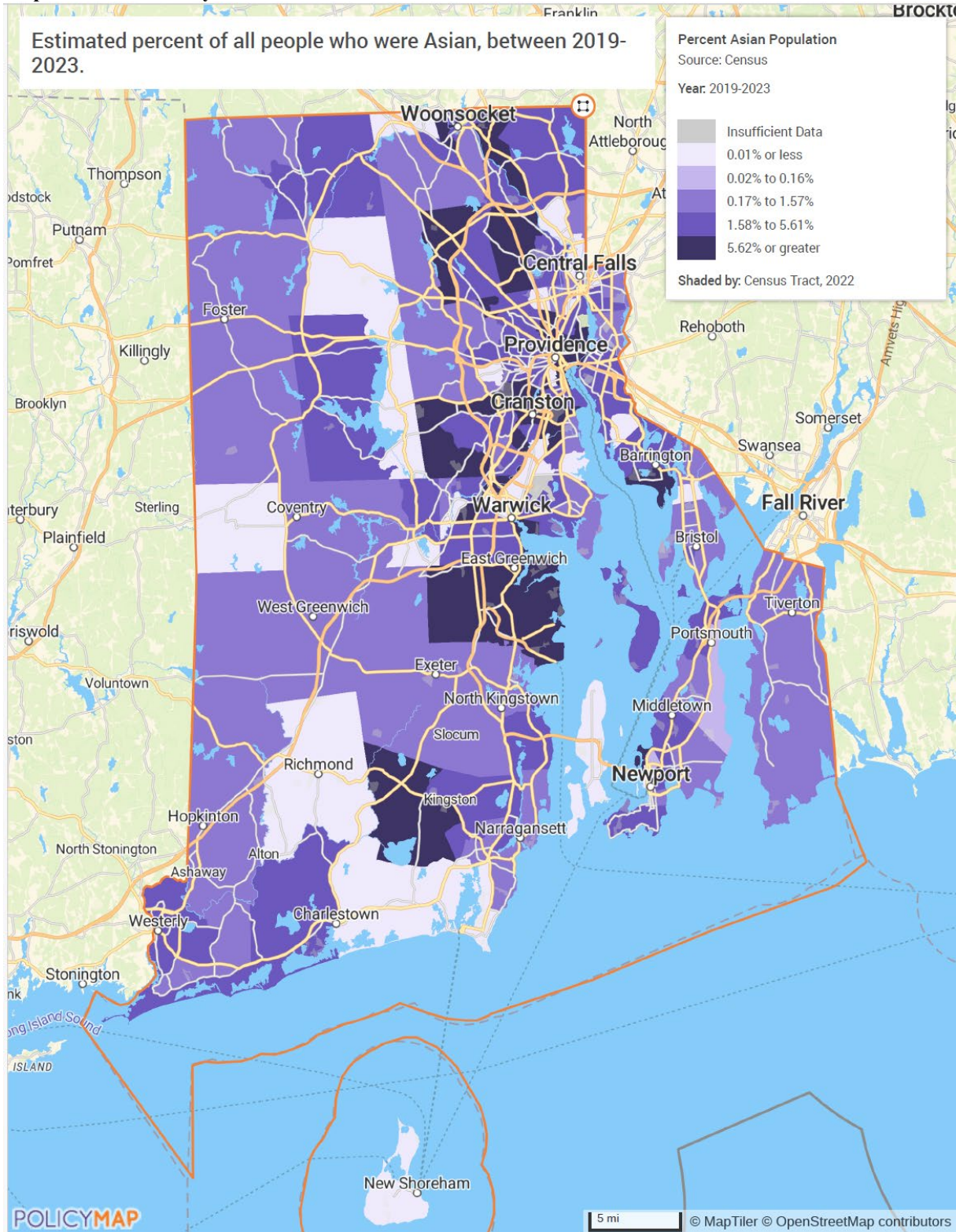
The below maps show the concentrations of the categories of residents who are overrepresented in households who experience housing problems. The majority of Rhode Island is White, with non-White residency patterns mostly around metropolitan areas such as Providence, Woonsocket, Cranston and—among non-entitlement areas—Newport, Kingston, and Central Falls.

Map 1 Black/African American Residency Patterns



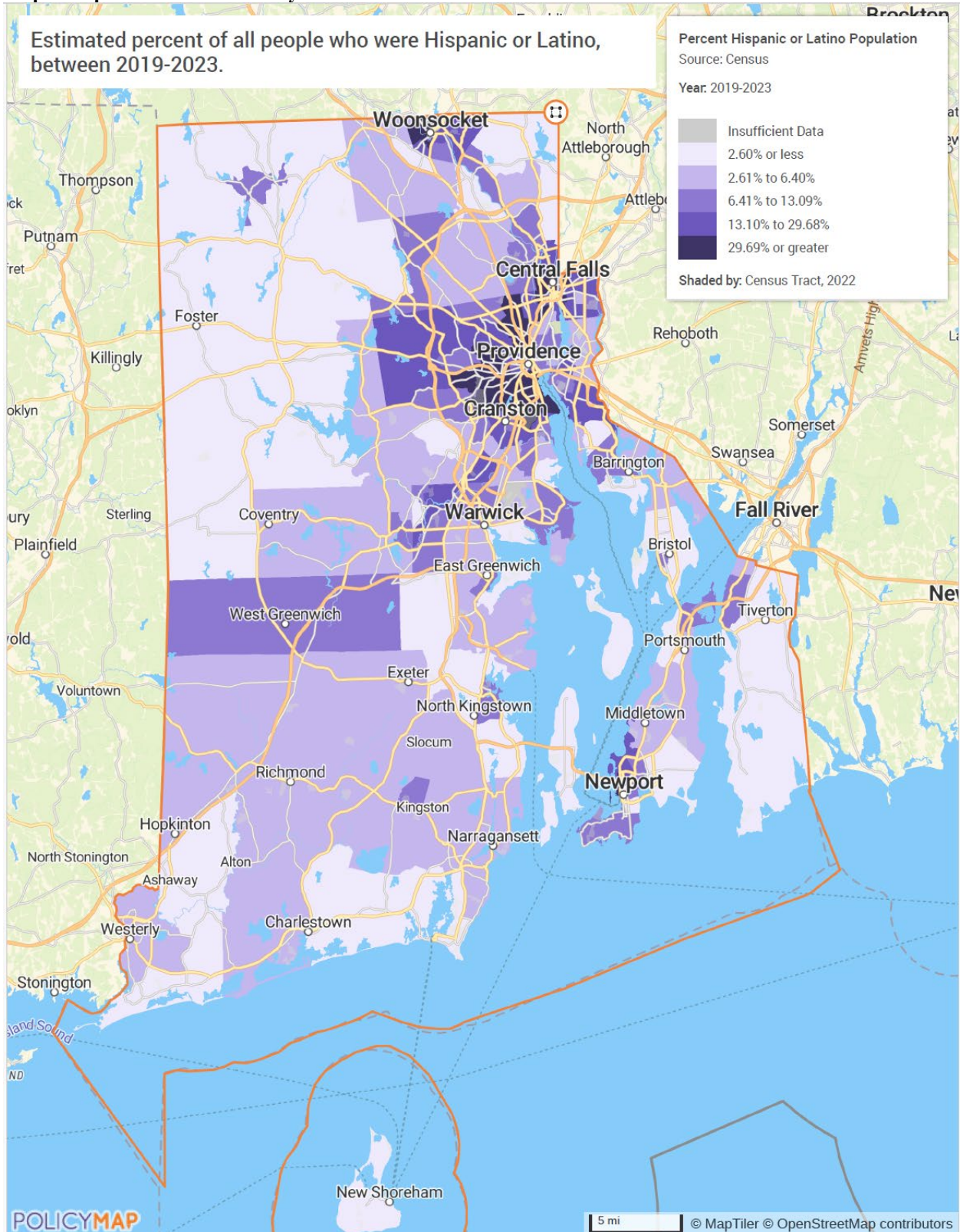
Source: 2023 ACS 5-Year Estimates via PolicyMap

Map 2 Asian Residency Patterns



Source: 2023 ACS 5-Year Estimates via PolicyMap

Map 3 Hispanic/Latino Residency Patterns



Source: 2023 ACS 5-Year Estimates via PolicyMap

NA-35 Public Housing – (Optional)

Introduction

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	79	0	1,425	289	1,126	1	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
# Homeless at admission	0	4	0	2	1	0	1	0	
# of Elderly Program Participants (>62)	0	11	0	196	45	151	0	0	
# of Disabled Families	0	29	0	458	61	393	1	0	

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	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# of Families requesting accessibility features	0	79	0	1,425	289	1,126	1	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	60	0	986	221	757	1	0	0
Black/African American	0	18	0	323	47	274	0	0	0
Asian	0	1	0	26	4	22	0	0	0
American Indian/Alaska Native	0	0	0	65	7	58	0	0	0
Pacific Islander	0	0	0	25	10	15	0	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	11	0	481	59	419	0	0	0
Not Hispanic	0	68	0	944	230	707	1	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be suitable to persons with mobility impairments. Another 2% of public housing units must be suitable to persons with sensory impairments. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be suitable.

According to stakeholder sessions, these standards are being met by public housing authorities, however, this is not sufficient to meet the needs of disabled residents for affordable housing as a whole.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The greatest needs of households currently living in public housing continue to be stable, decent living conditions and access to opportunity, in the form of employment, education, or transportation connections to neighborhood amenities. Housing Choice Voucher holders often face difficulty finding suitable units and units to accommodate large families. Stakeholders also indicated that units reserved for survivors of domestic violence are typically larger units for survivors with children, but that smaller units are needed as well. Residents with HCV's also often need wraparound services and case management, which in turn instills confidence in landlords who may be hesitant to rent to those with vouchers.

How do these needs compare to the housing needs of the population at large

The needs for safe, decent and sanitary housing are universal needs for residents of the State. As housing costs continue to escalate, affordable housing options in areas of opportunity for households of a variety of income tiers will be necessary. There is not enough affordable housing for the population of Rhode Island in general. This need is even more pronounced for those who must rely on the availability of Housing Choice Vouchers and compete for the comparatively small number of units whose landlords accept these vouchers.

Discussion:

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

According to the 2024 Point-In-Time (PIT) Count for the Rhode Island Continuum of Care (CoC), there are as many as 2,442 individuals experiencing homelessness on any given night. Of those, 877 are sheltered and 534 are unsheltered. Of individuals experiencing homelessness in the Rhode Island CoC, 936 (38.3%) are chronically homeless, 130 (5.3%) are veterans, 27 are persons with HIV/AIDS (1.1%), 986 (40.4%) are severely mentally ill, and 524 (21.4%) are suffering from chronic substance abuse. The Homeless Management Information System (HMIS) from which this data is derived may count one person within multiple categories.

The chart below was provided by the Rhode Island Coalition to End Homelessness and contains the most accurate and updated information on the RI homeless population.

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	877	****	3275	1289	415	383
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	1038	527	5687	1747	439	554
Chronically Homeless Individuals	456	300	n/a	n/a	n/a	n/a
Chronically Homeless Families	180	0	n/a	n/a	n/a	n/a
Veterans	109	21	193	55	36	428
Unaccompanied Child	0	0	0	0	0	0

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
Persons with HIV	18	****	****	****	****	****
Severely Mentally Ill	618	368	3844	814	414	592
Chronic Substance Abuse	271	253	1891	313	170	667
Victims of Domestic Violence	146	35	3062	1005	218	614
Notes from HMIS providing context around the numbers provided			During 2024 by date client record created if also experienced literal homelessness	# who were added to the system for the first time during the year	SPM leavers- includes SO and projects with beds	Average SPM 1b2 adjusted length of time homeless, only can look at people who had an entry into a project with beds but will count them if they were placed there after a CLS in the city

**** suppressed numbers are too small to report out - our policy is to suppress any number lower than 10

Source: Rhode Island Coalition to End Homelessness, 2025

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Stakeholders identified an imbalance among the types of Rhode Island’s families and individuals experiencing homelessness. Reported point in time and census data backs up this representation. For Hispanics/Latinx and Black/African Americans, representation among homeless is substantially higher than representation among the general population. At stakeholder meetings

for this Consolidated Plan, stakeholders identified additional challenges and barriers among homeless and at-risk populations, including:

- Those exiting corrections facilities need greater levels of support for finding housing.
- It is acknowledged that more and more people are falling through the cracks of the homeless system. Attention to specific cases can shed light on where and why this is happening.
- More and more seniors on fixed incomes are becoming homeless.
- LGBTQ+, especially youths, experience systematic stigma and have a lack of support systems, including shelter and service resources, that are responsive to their needs. This includes the lack of identifying, collecting data about, and tracking LGBTQ+ individuals.
- There are few options for levels of care for homeless individuals other than a hospital or the street, and more permanent supportive housing is needed.
- Systems for housing and other benefits are fragmented and difficult to navigate for individuals and families homeless or in crisis. Comprehensive case management services are needed to combat this.

Nature and Extent of Homelessness: (Optional)

Race	Sheltered	Unsheltered
American Indian, Alaska Native, or Indigenous	47	10
Asian or Asian American	9	7
Black, African American, Or African	377	99
Hispanic/Latina/e/o Only	159	30
Middle Eastern or North African	6	0
Native Hawaiian or Other Pacific Islander	3	1
White	813	300
Ethnicity		
Hispanic and One or More Race	350	61
Non-Hispanic and Multiple Races	144	26

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

According to the 2024 Rhode Island CoC PIT Count, there were 877 individuals in households with parents and children and 130 veterans experiencing homelessness. Stakeholders report that households with children are often those who have survived domestic violence. Both families and veterans are often in need of permanent supportive housing options with wraparound services. These services that currently exist are not practically available, as individuals are placed on a waiting list for services they need in the immediate future.

Of survey responses received from those living in Woonsocket Family Shelter, 35% had been living at the shelter for 1-6 months, and another 35% had been living there for 7-12 months. 64% of respondents said that they were living in a room with 2 or more other people. When asked how long they planned to stay at the shelter, the majority of responses were “I don’t know” with a few adding context such as “whenever I can secure affordable housing.” Survey responses imply that the future is uncertain for the majority of persons staying in homeless shelters.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Ratios of the races of homeless persons in Rhode Island do not match those of the population as a whole. Approximately 19.5% of the individuals identified during the 2024 PIT were Black/African American despite comprising 5.8% of the total population. 24.6% identified as Hispanic versus 17.1% of the population, and conversely, 45.6% of homeless persons were white versus 80.9% of the total population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to the 2024 PIT, 2,442 persons were identified as homeless in the State. Of these, 534 were unsheltered individuals; there were 7 unsheltered families and there were no unsheltered youth-only households. Among other populations, Severely and persistently mentally ill (SPMI) persons and those with chronic substance use disorders were most represented among the unsheltered homeless population with 368 and 253 unsheltered individuals identified in the PIT count, respectively.

Discussion:

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

Persons with special needs include the elderly and frail elderly, persons with severe mental illness, persons with developmental disabilities, persons with physical disabilities, persons with substance use disorders. In addition, many persons with special needs also have very low incomes.

Describe the characteristics of special needs populations in your community:

Elderly

Elderly persons are more likely to live on fixed, very low incomes or require special supportive service to complete their daily routines. This means elderly residents especially need affordable housing options and easy access to service providers.

According to ACS 2019-2023 estimates, 33.2% of households consist of at least one person aged 65 or over. In addition, the Census reported that 32.4% of persons 65 years and over had at least one disability in 2023; 12.9% of whom experienced an independent living difficulty and 7.6% experienced a self-care disability.

Stakeholders report that more and more seniors are becoming homeless. Many cannot afford to keep up with property taxes and go from owning a home to being homeless. In addition, this population may be resistant to seek help or unable to navigate the systems which could provide them with assistance or services.

Persons with Disabilities

In 2023, 14.3% of the population had a disability. Individuals with ambulatory disabilities generally require suitable housing units, and individuals with independent living disabilities may require assisted living facilities. Data from the 2023 ACS indicates that 6.3% indicated an ambulatory difficulty; 6.7% reported a cognitive difficulty.

In the State, 9.4% of all adults aged 18-64 live below the poverty line. However, there are differences in the incidence of poverty by disability status. For those with a disability, 25.3% live below the poverty line as compared to 8.4% of those without a disability. Stakeholders report that waitlists for affordable units for seniors and persons with disabilities are extremely long.

Substance Abuse and Addiction

Stakeholders indicated the need for affordable housing for those exiting incarceration (including for drug-related offences) as well as rehab facilities and hospitalizations. The Rhode Island Department of Health maintains an Overdose Spike Alert Notification System, which informs residents, municipal leaders, public safety, and healthcare professionals, harm reduction organizations, and other stakeholders of increased drug overdose activity in any of the established overdose regions. RIDHOH deploys differing levels of response depending on the magnitude of the overdose spike. This information also informs funding targets and priorities.

Individuals who have special needs are typically extremely low income and face tremendous challenges finding housing that they can afford. Individuals with special needs also require supportive services in addition to housing that they can afford. Public and private sources have limited funds available for these purposes, making it difficult for non-profit organizations to develop and operate housing and supportive service programs.

What are the housing and supportive service needs of these populations and how are these needs determined?

Individuals who have special needs are typically extremely low income and face tremendous challenges finding housing that they can afford. Individuals with special needs also require supportive services in addition to housing that they can afford. Stakeholders repeatedly emphasized the need for permanent supportive housing with wraparound services for many of their homeless residents. Public and private sources have limited funds available for these purposes, making it difficult for non-profit organizations to develop and operate housing and supportive service programs.

Supportive housing for these special needs populations is a critical need. More specifically, supportive services for persons exiting substance use and mental health treatment, persons discharging from hospitals or other medical treatment, and persons exiting the prison system require stable environments in order to avoid relapse, recidivism and returns to homelessness. Seniors need property tax assistance/forgiveness and assistance accessing critical services. These needs were determined based on a variety of stakeholder and public meetings comprised of service and housing providers.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Within the State, there are approximately 2,749 Individuals living with HIV/AIDS, including 65 newly diagnosed cases in 2022.

Supplemental Table 5 Number of Cases of HIV/AIDS 2022

HIV Surveillance Data	Number of Cases
Number of Persons living with HIV (PLWH)	2,749
Area Prevalence (PLWH per 100,000 residents)	261
Number of new HIV cases reported last year	65

Source: RIEOH HIV Surveillance Data 2022

In the last 10 years, among people with known mode of exposure, 64% of newly diagnosed cases of HIV were among gay, bisexual, or other men who have sex with men (GBMSM). During this same time the number of newly diagnosed cases of HIV among heterosexual males and females, as well as people who inject drugs, has remained low (fewer than 5). In 2022, there were almost five times as many cases of HIV among GBMSM when compared to females, male heterosexuals, and people who inject drugs, combined.

Rhode Island has signed on to the International Association of Providers of AIDS Care (IAPAC) Fast-Track Cities Initiative, a global partnership with local municipalities, the Joint United Nations Programme on HIV/AIDS (UNAIDS), the United Nations Human Settlements Program (UN-Habitat), and the City of Paris to achieve the three UNAIDS 90-90-90 targets:

1. 90% of all people living with HIV in Rhode Island will know their HIV status;
2. 90% of all people with diagnosed HIV infection will receive sustained antiretroviral therapy (ART); and
3. 90% of all people receiving ART will achieve viral suppression.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

RIHousing will not be establishing a preference for a HOME TBRA activity for persons with a specific category of disabilities.

Discussion:

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

Through the State CDBG program, The Executive Office of Housing can fund the reconstruction, rehabilitation, or installation of public facilities. Eligible public facilities include health centers, childcare centers, job training centers, congregate meal sites, and other neighborhoods facilities that serve the community.

Public facility improvements are considered a high priority need in Rhode Island. Facilities across the State are aging and require rehabilitation to provide high quality service to the target populations. The services linked with these facilities primarily benefit low- and moderate-income households. During public meetings and stakeholder sessions, quality schools, parks, and job training were cited as needs throughout the state.

How were these needs determined?

The Public Facility and Infrastructure Needs, as with all needs outlined in the Consolidated Plan, were determined through a combination of input from:

- Statewide survey results
- Community stakeholder comments
- Consultations with subrecipient and other non-profit service providers
- Public meetings and pop-up events

Describe the jurisdiction's need for Public Improvements:

Through the State CDBG program, the Executive Office of Housing can fund the construction, rehabilitation, or installation of public infrastructure improvements. Public infrastructure improvements include, but are not limited to, stormwater management and water/sewer installation and maintenance.

Public infrastructure improvements are also a high priority need in Rhode Island. During stakeholder sessions and public meetings, sidewalks that are suitable for wheelchairs and other mobility aids, public transit, walkable areas, and water and sewer improvements were cited as infrastructure needs. Review of ConnectRI's Digital Strategic Plan also revealed a need for greater fiber optic infrastructure throughout unconnected areas of the State in terms of broadband connectivity.

How were these needs determined?

The Public Facility and Infrastructure Needs, as with all needs outlined in the Consolidated Plan, were determined through a combination of input from:

- Statewide survey results
- Community stakeholder comments
- Consultations with subrecipient and other non-profit service providers
- Public meetings and pop-up events

Describe the jurisdiction’s need for Public Services:

Through the State CDBG program, the Executive Office of Housing can fund an array of public services in communities and cities across Rhode Island. Eligible public services include, but are not limited to, education and workforce development programs and transportation services to and from work.

The state of Rhode Island has several public service needs identified by stakeholders, including workforce development programs, affordable transportation to facilitate access to jobs, affordable childcare, case management services, and youth services. People who staff these public services should be paid livable wages. Public meetings also revealed a need for youth programs and healthcare.

How were these needs determined?

The Public Facility and Infrastructure Needs, as with all needs outlined in the Consolidated Plan, were determined through a combination of input from:

- Statewide survey results
- Community stakeholder comments
- Consultations with subrecipient and other non-profit service providers
- Public meetings and pop-up events

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The purpose of the Market Analysis is to provide a clear picture of the environment in which grantees must administer their HUD programs over the course of the Consolidated Plan. In conjunction with the Needs Assessment, the Market Analysis provides the basis for the Strategic Plan and the programs and projects to be administered. This section describes the significant characteristics of the Rhode Island housing market, including the supply, demand, and condition and cost of housing; lead-based paint hazards; public and assisted housing; facilities, housing and services for homeless persons; special need facilities and services; and barriers to affordable housing.

Throughout this analysis, the following issues have been identified:

- Across Rhode Island, there is a mismatch between the number of affordable units and the population of low- and moderate-income households.
- There is a potential gap in adequately sized housing units in urban markets – 74% of rental units have 2 or fewer bedrooms, but there is still a relatively high concentration of families with 4+ persons.
- Increases in wages are not keeping pace with increasing housing values.
- Cost burden for housing is prevalent throughout the state. A household earning the median income for renters (\$48,434 in 2023) can afford to pay \$1,332 per month toward housing costs, which is lower than average rents costs in the State for every unit size.

MA-10 Number of Housing Units – 91.310(a)

Introduction

The housing stock in Rhode Island is principally single-family (59.2%) and owner-occupied (63.3%). Data from the 2023 ACS indicates that 10.3% of all adults aged 18-64 live below the poverty line. Among the entire population, 10.9% live below the poverty line. Among children under the age of 18 and seniors over the age of 65, approximately 13.3% and 10.5%, respectively, live below the poverty line. Households with children and persons with disabilities need more affordable housing, particularly within the renter-occupied market.

Of the nearly 280,000 owner-occupied units in Rhode Island, 69.2% consist of three or more bedrooms. Among renter-occupied units, this number is only approximately 25%. These data are consistent; single family units – which tend to be larger than multi-family units – comprise nearly 60% of the housing stock. There is a need for more multi-family housing units which tend to be more affordable, particularly for small families with children and single person households, demographic groups particularly prone to cost burden and severe cost burden. Multifamily housing developments should include units with 3 or more bedrooms.

The vacancy rate decreased from 12.1% in 2018 to 9.8% in 2023, according to ACS data.

The table below has been generated by HUD and contains data from the 2016-2020 ACS.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	256,707	55%
1-unit, attached structure	15,191	3%
2-4 units	110,587	24%
5-19 units	41,559	9%
20 or more units	37,490	8%
Mobile Home, boat, RV, van, etc	5,136	1%
Total	466,670	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	588	0%	9,118	6%

	Owners		Renters	
	Number	%	Number	%
1 bedroom	7,243	3%	49,354	30%
2 bedrooms	57,625	23%	61,977	38%
3 or more bedrooms	181,835	74%	44,288	27%
Total	247,291	100%	164,737	101%

Table 27 – Unit Size by Tenure

Data Source: 2016-2020 ACS

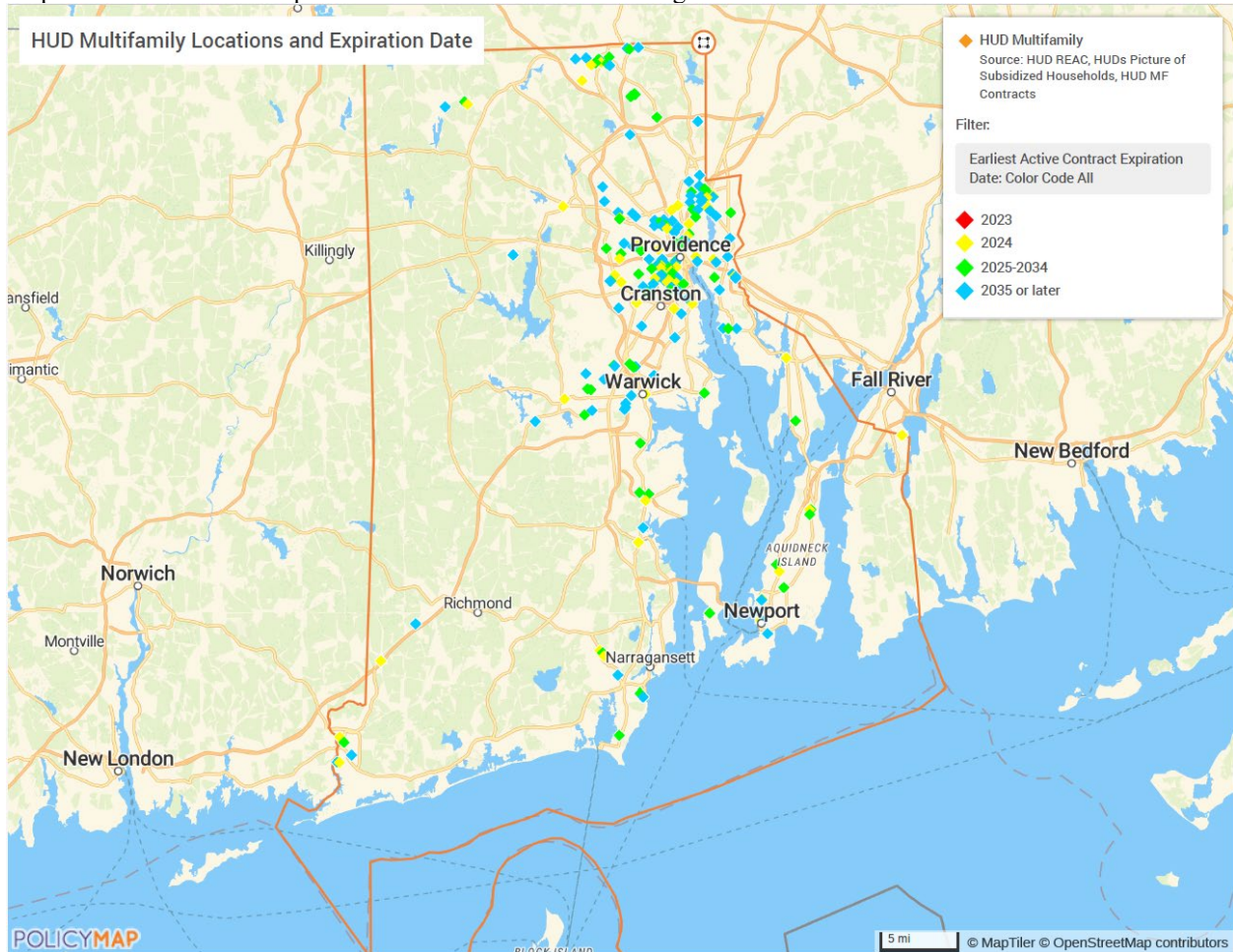
Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The below map was generated by PolicyMap to show the locations and earliest contract expiration dates of subsidized affordable housing. Overall, this map shows 231 housing locations comprising 17,653 total units. Of these, 7,373 (42%) of units have an earliest contract expiration date by 2035. Of these the period of affordability of 3,060 (17.3%) could expire by 2030.

In general, the concentration of subsidized units is greatest in and around Providence and Cranston, with others in Warwick, Woonsocket, and Newport. Other areas of the state have very few subsidized units with expiring subsidy contracts.

Map 4 Earliest Contract Expiration Date for Subsidized Housing



Source: HUD REAC Database via PolicyMap

Does the availability of housing units meet the needs of the population?

There is not an adequate supply of housing units for low- and moderate-income households throughout the state. As noted above, this need is likely to increase with 42% of existing assisted units’ affordability covenants possibly expiring in the next ten years.

Describe the need for specific types of housing:

Specific housing needs include an overall increase in units (rental and ownership) for low- and moderate-income households as well as increasing need for units designed for elderly and disabled residents.

Discussion

MA-15 Cost of Housing – 91.310(a)

Introduction

Home values are often used as a proxy for other non-market goods affecting quality of life, such as proximity to public transit and green space, growth potential in terms of population and development, quality of schools, and more. According to the ACS 5-Year Estimates for 2019-2023, the median home value in Rhode Island in 2023 was \$368,800, more than 21% greater than the national median home value of \$303,400.

The HUD-provided table below indicates the number of affordable units available to households with various income levels. The 22,385 rental units identified as affordable to households below 30% of the HUD-adjusted Median Family Income (HAMFI) represent only 12.4% of the rental housing inventory in the State of Rhode Island. Given that CHAS data indicates there are 64,965 households with incomes below 30% of HAMFI, there are nearly 3 households that need affordable housing at this income level for each affordable unit available, representing a clear and demanding need for additional affordable housing units.

The 2025 Fair Market Rent (FMR) for a two-bedroom unit varies by metropolitan area. The median FMR for all areas in Rhode Island is \$1,614. To avoid being cost burdened, a household needs to earn \$5,380 per month, or roughly \$44.83 per hour. A minimum wage worker in Rhode Island earning \$15.00 per hour needs to work in excess of 80 hours per week to afford a two-bedroom unit. For 2025, the monthly Supplemental Security Income (SSI) payment is \$1,006.92 for an eligible individual and \$1,529.38 for a couple. Households for which this is the sole source of income can spend \$332 monthly on housing for an individual or \$504 for a couple, which in both cases, is less than a third of the cost of renting a two-bedroom unit.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	238,000	242,200	2%
Median Contract Rent	791	820	4%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	36,252	22.0%
\$500-999	82,465	50.1%

Rent Paid	Number	%
\$1,000-1,499	34,276	20.8%
\$1,500-1,999	7,759	4.7%
\$2,000 or more	3,985	2.4%
Total	164,737	100.0%

Table 29 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	22,385	No Data
50% HAMFI	49,780	7,350
80% HAMFI	108,610	38,845
100% HAMFI	No Data	67,030
Total	180,775	113,225

Table 30 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent ¹	\$1,233	\$1,319	\$1,614	\$1,945	\$2,359
High HOME Rent ²	\$1,259	\$1,350	\$1,622	\$1,865	\$2,061
Low HOME Rent	\$983	\$1,054	\$1,265	\$1,461	\$1,630

Table 31 – Monthly Rent

Data Source: HUD FMR and HOME Rents 2025

Is there sufficient housing for households at all income levels?

Across Rhode Island, there is a mismatch between the number of affordable units and the population of low- and moderate-income households. Table 34 shows the number of housing units affordable to those earning 100% AMI or below. Although there are over 65,000 extremely low-income households (0-30 percent AMI), about 48,000 low-income households

¹ FMR represents the median of all HUD Local Area FMRs

² High and Low HOME rents are for the Providence-Fall River MSA

(30-50 percent AMI), and over 64,000 moderate income households (50-80 percent AMI), even most of these affordable housing units are only affordable to households earning 80 percent AMI or above. Specifically, an estimated 12.4 percent of rented units (22,385 units) are considered affordable for extremely low-income households. 27.5 percent of rented units (49,780 units) are affordable for low-income households with 60 percent (108,610 units) affordable to moderate income or above households. Owner housing units also tend to be affordable to households earning higher incomes. Only 6.5 percent of owner units are affordable to low-income households, 34.3 percent are affordable to moderate income households, and 59.2 percent of units are affordable to households earning 100 percent AMI.

How is affordability of housing likely to change considering changes to home values and/or rents?

The Housing Gap in Rhode Island, like other trends, is not easily defined by urban, suburban or rural area but rather by tenure and income tier. The problem of finding available and affordable housing is acute for renter households with incomes below 30% AMI and is problematic in some areas up to 60% AMI. Affordable ownership housing is a problem for most income tiers, but the problems with affordability tend to be concentrated among lower incomes (among people who may be least able to afford homeownership) and above 100% of AMI, where there is more competition for a limited inventory of housing. Although incomes have increased over the past 5 years, they have not kept pace with the increase in housing value. The challenge now is to facilitate a housing market that can better address the needs of differing household populations based on income, tenure, and type.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Each year, RIHousing compiles data on average rental costs across the state by municipality and bedroom size. The purpose of this survey is to track changes in the rental housing market to support program planning and policy efforts. In 2023, the average rents (adjusted for inflation) in Rhode Island were:

- Studio - \$1,470
- 1-Bedroom - \$1,503
- 2-Bedroom - \$1,861
- 3-Bedroom - \$1,920
- Affordable for Median Income Renter - \$1,332

Per the 2024 Rental Survey findings, there has been an upwards trend in rental costs over the past five years. Since 2020, after adjusting for inflation, average rental costs increased by 2.7%

for studios, 6.7% for one-bedroom, 4.2% for two-bedroom and 1.9% for three-bedroom apartments. A household earning the median income for renters (\$48,434 in 2023) can afford to pay \$1,332 per month toward housing costs. However, costs for all unit types are well above \$1,500. A typical renter household would struggle to find an apartment they can afford in nearly all communities in Rhode Island.

Fair Market Rents, on average, are 90% of rental housing costs measured in the RIHousing Rental Survey. Overall, the average rental rates are significantly higher than the HOME and FMR rents.

The area median contract rent generated for this report was \$1,108, which comes from 2023 census data. In 2018, the median contract rent was measured to be \$1,035 after adjusting for inflation, a 7.1% increase in only two years.

As median rents continue to increase, the need for rents charging Fair Market Rent will increase even more, putting further pressure on the need to produce and preserve affordable housing.

Discussion

MA-20 Condition of Housing – 91.310(a)

Introduction:

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. According to the 2023 ACS 5-Year Estimates, the median year a structure was built is 1961. Specifically, multifamily rental housing is old: of all rental housing with 5 or more units in the structure, 68.7% was built before 1980.

The publicly assisted housing stock, on which so many low-income households depend, is aging. Much of it needs investment to preserve it as an affordable housing resource. A growing number of the state’s residents will require adaptations to their homes and/or supportive services to live independently, due to the aging of the state population. This section describes the specific conditions of homes, which if alleviated, would lead to a more efficient, healthy, affordable and housing stock in Rhode Island.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

HUD defines “substandard” as households without hot and cold piped water, a flush toilet and a bathtub or shower; or kitchen facilities that lack a sink with piped water, an oven or stove, or a refrigerator. The definition of substandard suitable for rehabilitation means any “substandard” dwelling in which the deficiencies are limited in number and magnitude such that the cost of rehabilitation would not exceed 50% of the replacement cost of the dwelling.

Assessing housing conditions in Rhode Island can provide the basis for developing policies and programs to maintain and preserve the quality of the state’s housing stock. The American Community Survey (ACS) defines a “selected condition” as owner- or renter-occupied housing units having at least one of the following conditions: 1) lacking complete plumbing facilities; 2) lacking complete kitchen facilities; 3) more than one occupant per room; and 4) selected monthly housing costs greater than 30% of household income. Based on this definition, nearly half of all renter-occupied households in the state (44%) have at least one selected condition. A lower, yet significant proportion of owner-occupied households in the state (28%) have at least one selected condition.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	69,095	28%	72,223	44%
With two selected Conditions	978	0%	3,943	2%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With three selected Conditions	94	0%	241	0%
With four selected Conditions	0	0%	31	0%
No selected Conditions	177,124	72%	88,299	54%
Total	247,291	100%	164,737	100%

Table 32 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	20,787	8%	9,434	6%
1980-1999	52,282	21%	26,214	16%
1950-1979	98,100	40%	55,202	34%
Before 1950	76,122	31%	73,887	45%
Total	247,291	100%	164,737	100%

Table 33 – Year Unit Built

Data Source: 2016-2020 CHAS

An aging housing stock is a major concern for Rhode Island; it has the third oldest housing stock in the nation. The median year of structures built in Rhode Island is 1961, giving structures an estimated median age of 64 years. Older homes are more likely to contain environmental health hazards, such as lead in pre-1978 homes, and lack features for elderly persons and persons with disabilities. In addition to the potential risk of lead exposure, older homes typically need mechanical system and energy efficiency upgrades which may not be financially feasible, particularly among low- and moderate-income households. For renters, making these improvements is often up to the landlord’s discretion. Renters may not be able to afford moving in search of housing that has received a certificate of lead compliance. High energy costs can contribute to cost burden. For persons with health conditions such as asthma, features such as excessive moisture and dampness, inadequate or poorly maintained heating and ventilation systems, and structural defects are associated with exposure to indoor asthma triggers.

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	174,222	70%	129,089	78%
Housing Units build before 1980 with children present	14,685	6%	9,185	6%

Table 34 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			47,713

Table 35 - Vacant Units

The only available data for the table above is for the number of vacant units. Physical condition or need for rehabilitation is not known.

Need for Owner and Rental Rehabilitation

Given the age of housing stock and input from stakeholders, there is a large need throughout the state for owner and rental rehabilitation. This includes assisted properties that may be aging out of their affordability covenants. Housing preservation is a priority for this 5-Year Consolidated Plan cycle.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Lead-based paint was banned from residential uses in 1978. All houses constructed before 1978 are therefore considered at risk for containing lead-based paint. HUD has made the elimination of housing units containing lead-based paint a priority. The poisoning of children from contact with lead-based paint has been recognized as a major public health problem by the Center for Disease Control (CDC). According to the CDC, lead is the number one environmental health hazard to American children. It is estimated that 10%-15% of all preschoolers in the United States are affected. Lead poisoning causes IQ reductions, reading and learning disabilities, decreased attention span, hyperactivity, and aggressive behavior.

Children in renter- and owner-occupied households are roughly equally as likely to be impacted by lead-based paint hazards. Data from the 2016-2020 CHAS estimates that only 6% of owner-occupied and 6% of renter-occupied (who are more likely to be low-moderate-income) units built before 1980 are occupied by households with children. This equates to 23,870 households.

Additionally, Rhode Island requires landlords of all properties built before 1978 to get a Certificate of Lead Conformance (CLC). This requires landlords to get the property inspected by a licensed lead inspector, correct any lead hazards within 30 days, and have the property reinspected to ensure that issue was corrected. There are financial resources available to mitigate lead hazards, including a \$5,000 tax credit per property, Providence Revolving Fund for Home Repairs, The Leadsafe Homes Program to mitigate LBP hazards, and various funds in specific municipalities.

According to data from the Rhode Island in 2023, of those tested, 2.4% of children aged 6 and younger tested above 5 mcg/dL (the previous limit for lead concentrations to be considered “elevated”, the CDC changed the limit to 3.5 mcg/dL in 2021). This number has been steadily decreasing from 9.8% in 2010. Similarly, the percentage of new cases of those tested was 1.5% in 2023, down from 7.4% in 2010. Persistent testing and mitigation efforts in Rhode Island have been effective in decreasing these lead hazard risks for children.

Discussion:

MA-25 Public and Assisted Housing – (Optional)

Introduction:

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units/ vouchers available	0	74		1,609	312	1,297	0	640	3,229
# of accessible units									

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

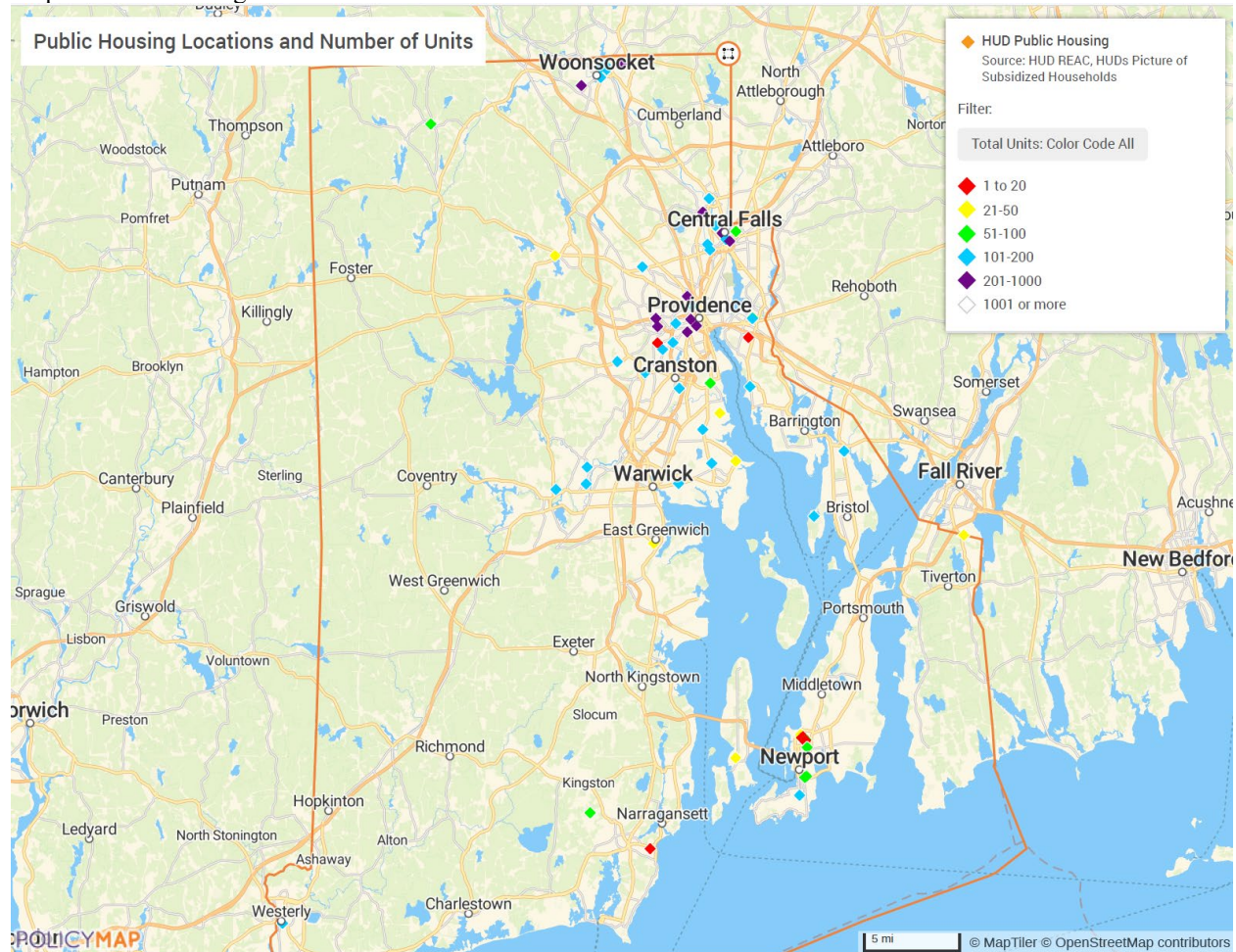
Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

The State of Rhode Island has 27 total Public Housing Agencies with 66 properties containing 9,038 units. These properties are largely concentrated in and around Providence and Cranston. The below map generated from PolicyMap shows the locations and number of units of public housing properties in Rhode Island. However, this data source did not display the full list of Public Housing properties. That list is included in Appendix A.

Map 5 Public Housing Locations and Number of Units



Source: HUD REAC via PolicyMap

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The State of Rhode Island has 27 total Public Housing Agencies with 66 properties containing a total of 9,038 units. The average physical inspection score of the properties was 83.5 according to the HUD Physical Inspection database.

Properties fall under one of three inspection standards. Standard 1 indicates an inspection score of 90 or more; these properties are at the most favorable level and required to undergo inspection once every 3 years. Standard 2 properties received an inspection score of 80-89 points and required to undergo inspection once every 2 years. Standard 3 is the least desirable category. These properties received a score of less than 80 points and are required to undergo inspection every year. Roughly 41.8% of units fall in the Standard 3 category. 23.5% are in Standard 2, and 34.5% fall into Standard 1.

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

Given that 41.8% of public housing units in Rhode Island fall into the Standard 3 category of inspection scores less than 80, there are revitalization needs of public housing. The physical inspection scores evaluate the site, building exterior, building systems, common areas, and units to determine the overall score.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Public housing agencies in Rhode Island are continually evaluating the living environments of public housing and developing strategies to keep them up to acceptable standards. Some public housing authorities are working with RIHousing to revitalize existing public housing through RAD conversion. RIHousing is also administering \$10m in State and Local Fiscal Recovery funds to provide capital and technical assistance funds to help PHAs plan for and implement proposals to develop additional housing and stabilize existing units. The recently passed affordable housing bond includes an additional \$10m for similar efforts.

Discussion:

MA-30 Homeless Facilities – 91.310(b)

Introduction

This section provides an inventory of facilities, housing, and services that meet the needs of homeless persons throughout Rhode Island, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. The table below includes information from the Rhode Island Statewide CoC Housing Inventory Count for 2024.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	920		105	1,355	
Households with Only Adults	966		108	800	
Chronically Homeless Households	0		0	686	
Veterans	89		78	322	
Unaccompanied Youth	27		21	5	

Table 37 - Facilities Targeted to Homeless Persons

Supplemental Table 6 Summary of all Available Beds

Type	Family Units	Family Beds	Adult-Only Beds	Total Yr-Round Beds	Seasonal	Overflow w/Voucher	Subset of Total Bed Inventory		
							Chronic Beds	Veteran Beds	Youth Beds
Emergency, Safe Haven, and Transitional Housing	296	920	966	1,886	146	43	n/a	89	27
Emergency Shelter	263	815	858	1,673	146	43	n/a	11	6
Transitional Housing	33	105	108	213	n/a	n/a	n/a	78	21
Permanent Housing	456	1,355	1,530	2,885	n/a	n/a	n/a	389	109
Permanent Supportive Housing	156	555	800	1,355	n/a	n/a	686	322	5
Rapid Re-Housing	132	385	224	609	n/a	n/a	n/a	67	93
Other Permanent Housing	168	415	509	921	n/a	n/a	n/a	0	11
Grand Total	752	2,275	2,496	4,771	146		686	478	136

Source: HUD 2024 HIC

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Mainstream Services: The mainstream services available for homeless persons in Rhode Island include:

- Supplemental Nutritional Assistance Program (SNAP)
- MEDICAID health insurance
- MEDICARE health insurance
- Women, infants, and children supplemental nutritional program
- Veterans Administration medical services
- Temporary Assistance for Needy Families child care
- Transportation or other services

In addition, moving into permanent housing is a vital outcome for all homelessness programs, non-cash mainstream services also include moving into Section 8 housing, public housing or into a home with rental assistance.

Health Care: Rhode Island's Department of Health and OHCD has an agreement dictated through a MOA that hospital patients not be discharged into homelessness. A person that is homeless or is at-risk of homelessness remains hospitalized until they are healthy enough to move onto housing and receive case management support as outlined in a discharge plan. The plan may call for independent living if applicable, and if not, then referrals are made to community-based agencies, substance abuse treatment centers, Medicaid Waiver assisted living or long-term care facilities. In addition, if a person is healthy enough for discharge from hospital, but has housing instability or is homeless, there is a medical respite pilot shelter program run by the Executive Office of Health and Human Services (EOHHS) to address their ongoing medical needs and keep them from returning to the street. Rhode Island's Housing First initiative provides supportive housing where tenancy is not conditional upon sobriety. Discharge planners in assisted living facilities are trained to identify mainstream opportunities and to pair placements with Money Follows the Person (MFP Program) long-term care services. The MFP-program, also known as the Rhode to Home program, enables the state to provide the necessary Home and Community Based Services (HCBS) resources to promote the transition of eligible individuals who have been in qualified inpatient facilities for at least 90-days into qualified residencies. Community settings are more often preferred by Rhode Islanders and are less costly than institutional placements. The savings realized from transitioning individuals from an institutional to a community-based setting will be "reinvested" into the state's Long-Term Care (LTC) system.

Employment Services: Many homeless program providers offer pre-employment services, adult education, GED preparation, vocational service programs, financial literacy programs, job placement, specific job training (i.e. CrossroadsRI's janitorial training program), job development, career counseling, and resume preparation. Recognizing the importance of earned income for the homeless disabled population in permanent supportive housing, BHDDH has created an Employment First program, which helps permanent supportive housing residents identify supportive companies and provide the necessary services to maintain a job. According to their webpage, they "support employment services offered by licensed providers through our community mental center centers or behavioral health organizations...to promote and emphasize integrated, community-based employment and meaningful, integrated day programs that build vocational skills and community connections."

Mental Health: The state's Housing First programs include licensed providers of Community Psychiatric Support Treatment (CPST) to those that are eligible for such treatment. Many permanent supportive housing providers offer varying degrees of individual, family, and group counseling; referral programs; outpatient substance abuse care; mental health and psychiatric support; treatment adherence; crisis intervention and coordinate support groups. SSI/SSDI Outreach, Access and Recovery (SOAR) activities, provided by Rhode Island Coalition to End Homelessness, will find a new sponsor during the upcoming planning period. In the interim, insurance providers through HealthSourceRI are establishing outreach teams.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The U.S. Executive Office of Housing and Urban Development (HUD) primarily funds local responses to homelessness through the Continuum of Care Program. The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness. RIHousing acts as the designated Collaborative Applicant agency for the Rhode Island Continuum of Care (RICOC) for CoC program funds and is responsible for overseeing RICOC's annual funding competition, compliance processes and system planning and policy oversight.

The purposes of the RI Continuum of Care are to:

- Promote communitywide commitment to employ best practices to end homelessness in Rhode Island;
- Secure funding for efforts by providers and government entities to prevent homelessness and quickly re-house homeless individuals (including unaccompanied youth) and families in Rhode Island, while minimizing the trauma and dislocation that homelessness causes to individuals, families, and communities;
- Promote access to and effective utilization of mainstream programs by homeless individuals and families; and
- Optimize self-sufficiency among individuals and families that experience homelessness.

The Rhode Island Coalition for the Homeless acts as the Lead Agency for managing RICOC's Homeless Management Information System (HMIS). A Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Each Continuum of Care (CoC) is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.

Under the requirements of the Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program (HEARTH Act), The Rhode Island Continuum of Care is required to implement 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

The Rhode Island Coordinated Entry System (CES) is a partnership of all the homeless providers in the state and is an initiative of the Rhode Island Continuum of Care. The day-to-day operations of this program are led by the Rhode Island Coalition to End Homelessness and Crossroads Rhode Island.

Crossroads Rhode Island operates the diversion component of the CES, which attempts to divert households at risk of homelessness from entering the shelter system. The Rhode Island

Coalition for the Homeless manages the call center, shelter placement, and permanent housing placement part of the CES.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

The below sections detail the current needs and services of and for non-homeless special needs residents of Rhode Island.

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Behavioral Health: The Rhode Island Governor's Council on Behavioral Health is the State's behavioral health planning council. It was established by both federal and State law to review and evaluate the needs and problems associated with Rhode Island's services for individuals with mental health and substance use disorders. In addition, the Council stimulates and monitors the development, coordination, and integration of these State-wide services. The Council also serves in an advisory capacity to the Governor and the General Assembly. The Governor's Council has eighteen Public Members. These members may be behavioral healthcare service providers, consumers of these services, their family members, individuals in recovery from mental illness or substance use disorders, behavioral healthcare advocates or other interested parties. More than half of the members must be consumers of behavioral healthcare services, their family members, advocates or others. Representatives from State departments are also members, but do not vote. Council meetings are open to the public, and guests are encouraged to participate, although they may not vote. Meetings are held monthly.

Division of Behavioral Healthcare, Developmental Disabilities and Hospitals (“BHDDH”): In 2024, BHDDH has transitioned from the CMHC model to the Coordinated Community Behavioral Health Clinic (CCBHC) model of care. The CCBHC model is a national set of standards for comprehensive behavioral health care that is jointly supported by the Centers for Medicare and Medicaid Services (CMS) and [the Substance Abuse and Mental Health Services Administration \(SAMHSA\)](#). The following cites are certifies CCBHs: Community Care Alliance; Family Service of Rhode Island; Gateway; The Providence Center; Thrive Behavioral Health (Kent Center); and Newport Mental Health. This network provides comprehensive behavioral health services to adults with behavioral health needs. Typically, the CMHCs provide behavioral health services ranging from 24/7 crisis support, counseling and therapy, peer supports, connection to social and veterans’ services, screening and assessments, and more.

Hospitalization and Hospital Diversion Services: BHDDH, in response to a rising need and cost of psychiatric hospitalization, has attempted to improve efficiency in both the inpatient psychiatric service system and the medical substance abuse detoxification system by merging these

operations under one contract with step-down and diversion options that expand the continuum of care. In most cases, improved access and coordination of care is achieved by the Health Home (HH) Teams developing better linkages with primary care providers. The Health Home Teams include Peer Wellness Coaches who work with HH clients to implement individual Wellness Plans. Finally, the Health Homes are required to have hospital liaisons to assist in transitioning clients from acute care hospitals. BHDDH has worked with the Medicaid Authority and Medicaid Managed Care Organizations to ensure that all Behavioral Health Organizations (BHOs) have timely medical information on their clients. Also, the Department has worked with the BHOs to encourage participation in Current Care, the state's Health Information Exchange. Current Care is a secure, encrypted electronic network, protected by law, which gives authorized medical professionals access to their patients' most up-to-date health information so their patients can get the best possible health care.

Persons with Disabilities: Under the supreme court Olmstead ruling, states have a legal obligation to have the supports in place for individuals with disabilities to live, work, and receive services in the community in the least restrictive setting permitted by their 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.

Facilities and Services for Children in Need: Since the 1990s, DCYF has been moving toward a single, integrated system of care (SOC) to provide individualized, family-focused, community-based and culturally appropriate services to children and families throughout the state. Initial steps toward this integrated system of care included the creation of regional Family Service Unit offices and a focus on community-based services. During this time, DCYF had 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.

Adult Psychiatric Services: Admission to Eleanor Slater Hospital's Psychiatric Services is considered a restrictive treatment alternative; therefore, these services are used only when it has been determined that other community hospital inpatient facilities are not available or when no other form of residential or outpatient treatment is appropriate. Admissions to these units are for individuals between the ages of 18 and 64 who have been psychiatrically hospitalized in a community hospital for a substantial period of time prior and who continue to exhibit severe and persistent symptoms of mental illness and where no less restrictive setting is available.

HIV/AIDS: The State of Rhode Island did not receive a HOPWA grant for 2024.

The largest organization that treats persons with HIV and AIDS is AIDS Care Ocean State (ACOS). ACOS develops and operates supportive housing and provides case management to persons living with HIV/AIDS across Rhode Island. ACOS leverages a network of funding sources to provide comprehensive services to persons with HIV/AIDS in Rhode Island. Federal grant funds (HOME, CDBG), state funding sources (Neighborhood Opportunities Program, Department of

Health), and local non-profit assistance (LISC, Corporation for Supportive Housing) all combine to provide housing and supportive service resources to persons living with HIV/AIDS. Housing services include tenant-based rental assistance, project-based rental assistance, and short-term rent, mortgage and utilities assistance. Supportive services include:

- Patient advocacy
- Transportation to and from medical appointments
- Referrals for medical and mental health services
- Emergency financial assistance
- Medication adherence
- Respite care
- Eviction prevention
- Clinical counseling

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Across Rhode Island, BHDDH funds Mental Health Psychiatric Rehabilitative Residences (MHPRR) beds. Of those, eleven are supervised apartments. MHPRRs are facilities that provide Long-Term Care; patients accepted for admission must qualify for a group home level of care. When clients no longer qualify for group home level services as determined by the treatment team, discharge to a less restrictive environment becomes mandatory under federal guidelines. There are also many people living in subsidized apartments, condominiums and consumer-owned cooperatives who receive intensive case management services. Eleanor Slater Hospital offers a variety of programs for people who need continuing care after discharge from a community hospital, or who need more intensive care than a nursing home can provide. Eleanor Slater Hospital at the John O. Pastore Center in Cranston, RI and the Zambarano Unit in Burrillville, RI, provide intensive hospital level care to patients with long-term illnesses who are not in an acute phase, but require comprehensive long-term rehabilitative care. These kinds of patients have chronic disease that has left them with residual disability that has been caused by nonreversible pathological alteration. These patients require ongoing clinical intervention from a variety of hospital disciplines to eliminate discomfort and improve quality of life. The hospital also provides acute care services for patients who experience an acute medical event and require close medical supervision, monitoring of the condition and immediate diagnostic and therapeutic intervention. Most Eleanor Slater's admissions come from community hospitals; other major referral sources include mental health centers, nursing homes, and independent and residential care facilities. Patients admitted require hospital level care and can no longer benefit from acute care in a community hospital setting. Psychiatric services are an integral part of the RI network of hospital-based and community-based treatment alternatives for

individuals who suffer from chronic and serious psychiatric illnesses. The system seeks to provide treatment to everyone in the least restrictive setting possible. Eleanor Slater Hospital has two inpatient Psychiatric Units at the John O. Pastore Center in Cranston.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Ongoing activities provided by the state include the Supportive Housing Program and supportive services for persons with special needs.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Rhode Island is not an entitlement/consortia grantee.

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

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

However, much more needs to be done to increase building permit activity and reduce the growing affordability gap in the state.

Rhode Island is completing an Analysis of Impediments to Fair Housing in conjunction with the 5-Year Consolidated Plan. Impediments identified in the AI include:

- Inadequate supply of affordable housing
- inadequate level of public transportation
- Public opposition to new affordable housing development in some municipalities
- Inadequate level of funding for new housing
- Unequal outcomes in mortgage lending

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

Per HUD’s Market at a Glance report, prepared by PD&R/Economic & Market Analysis Division (EMAD) in October 2024, economic conditions in the state of Rhode Island have improved since 2023. During the 3 months ending (3ME) October 2024, nonfarm payrolls averaged 516,200 jobs, representing an increase of 7,967 jobs, or 1.6 percent, from a year ago. By comparison, nonfarm payrolls grew by 4,600, or 0.9 percent, during the same period a year earlier. In contrast, during the 3ME October 2024, the unemployment rate averaged 4.5 percent, compared with 3.0 percent a year earlier.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	836	832	0	0	0
Arts, Entertainment, Accommodations	31,665	29,802	13	16	3
Construction	12,529	10,536	5	6	0
Education and Health Care Services	52,310	34,155	22	19	-4
Finance, Insurance, and Real Estate	16,344	13,929	7	8	1
Information	4,189	3,071	2	2	0
Manufacturing	25,062	24,575	11	13	3
Other Services	9,920	7,996	4	4	0
Professional, Scientific, Management Services	22,375	14,744	10	8	-2
Public Administration	0	0	0	0	0
Retail Trade	29,923	22,974	13	12	0
Transportation and Warehousing	6,492	5,000	3	3	0
Wholesale Trade	10,310	6,927	4	4	-1
Total	221,955	174,541	--	--	--

Table 38- Business Activity

Data Source: 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

Supplemental Table: Number of Jobs by Industry Q4 2023

Industry	Jobs
All	368,603
Agriculture, Forestry, Fishing and Hunting	822
Mining, Quarrying, and Oil and Gas Extraction	137
Utilities	1,690
Construction	17,958
Manufacturing	36,817
Wholesale Trade	14,007
Retail Trade	33,778
Transportation and Warehousing	9,701
Information	5,225
Finance and Insurance	21,833
Real Estate and Rental and Leasing	5,108
Professional, Scientific, and Technical Services	24,622
Management of Companies and Enterprises	9,262
Administrative and Support and Waste Management and Remediation Services	18,246
Educational Services	38,832
Health Care and Social Assistance	63,293
Arts, Entertainment, and Recreation	5,655
Accommodation and Food Services	31,148
Other Services (except Public Administration)	13,381
Public Administration	17,088

Source: US Census LEHD Data 2023

The supplemental table above was generated from the Census LED Extraction tool and shows a more updated picture of the job landscape in the State. The numbers shown represent the number of stable main jobs that did not change during the reference quarter of Q4 2023.

Labor Force

Total Population in the Civilian Labor Force	566,403
Civilian Employed Population 16 years and over	535,140
Unemployment Rate	5.5%
Unemployment Rate for Ages 16-24	11.6%
Unemployment Rate for Ages 25-65	4.1%

Table 39 - Labor Force

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	216,935
Farming, fisheries and forestry occupations	2,676
Service	98,544
Sales and office	115,968
Construction, extraction, maintenance and repair	39,948
Production, transportation and material moving	63,745

Table 40 – Occupations by Sector

Data Source: 2016-2020 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	353,760	64.4%
30-59 Minutes	153,809	28.0%
60 or More Minutes	42,297	7.7%
Total	549,317	100%

Table 41 - Travel Time

Data Source: 2016-2020 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	27,816	2,512	46,785
High school graduate (includes equivalency)	105,663	7,303	85,421
Some college or Associate's degree	121,872	6,038	56,283
Bachelor's degree or higher	174,224	4,891	62,647

Table 42 - Educational Attainment by Employment Status

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	1,820	3,259	5,233	15,625	17,470
9th to 12th grade, no diploma	8,132	6,785	4,497	16,034	13,147
High school graduate, GED, or alternative	37,883	35,209	34,146	77,978	60,217
Some college, no degree	36,832	29,498	22,677	44,348	33,194
Associate’s degree	4,842	8,567	10,813	22,851	17,846
Bachelor’s degree	13,908	46,725	39,926	57,825	37,578
Graduate or professional degree	2,795	23,743	25,638	42,740	32,924

Table 43 - Educational Attainment by Age

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$28,970
High school graduate (includes equivalency)	\$36,472
Some college or Associate’s degree	\$41,289
Bachelor’s degree	\$57,066
Graduate or professional degree	\$76,987

Table 44 – Median Earnings in the Past 12 Months

Data Source: 2016-2020 ACS

Based on the Business Activity table above, what are the major employment sectors within the state?

The three largest employment sectors in the state are healthcare/educational services (22%), retail trade (13%), and arts/entertainment/accommodations (13%). The primary job center in the state is in Providence with a large share of residents commuting into Providence or the immediate metro area.

Some of the most common jobs in Rhode Island are low-paying and vulnerable during times of economic downturn. Households supported by one of these jobs would have to work

significantly more than 40 hours a week to afford the median two-bedroom rent. However, Rhode Island also has significant concentrations of some higher-paying jobs.

Describe the workforce and infrastructure needs of business in the state.

Over 98.9% of firms in Rhode Island are small businesses that employ 51.2% of the workforce (2022 SBA Small Business Profile). The workforce consists of 570,567 people over the age of 16.

Regarding transportation infrastructure, Rhode Island's location along Northeast 1-95 corridor means easy access to major metropolitan areas. People can reach Boston in under 45 minutes, and New York City in under three hours. To strengthen the long-term reliability of Rhode Island's roadway infrastructure, the state has made a significant investment of \$4.7 billion over 10 years to improve roads and bridges. In addition, an impressive array of bike paths winds through Providence's urban core and connects significant portions of the state. In 2024, the state made several investments into bike infrastructure, including installing a shared-use bike path on the rebuilt Henderson Bridge; \$4.2 million for bike path improvements as part of the "Missing Move" project; construction of a new shared-use path on the Route 6/10 interchange; and installation of a shared-use bike path connecting Pell Bridge with downtown Newport. Rhode Island's rail system serves both high-speed Amtrak trains and Boston's MBTA commuter rail. From Providence, commuters can reach Boston in 35 minutes by taking Amtrak Acela, with more than 40 trains daily between the two cities. It takes roughly 2.5 hours to reach New York City by Acela, with more than 20 daily trains between Providence and NYC. Also in 2024, RIDOT and Amtrak kicked off a \$30 million state-of-good repair project to provide a wide range of improvements to modernize and expand the station while upgrading passenger amenities to make it easier and safer to use the station. Westbound traffic on Washington Bridge, a major bridge between Providence and East Providence that leads into Massachusetts, was permanently closed in December 2023 after engineers discovered a structural issue that threatened collapse. \$470 million through three federal programs was awarded by the Biden administration to complete reconstruction. As of the date of this document, the state has not yet chosen a contractor to build the bridge, and the Westbound portion of the bridge remains closed.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The Revolution Wind project was recently approved and is part of an effort to bring 30 gigawatts of offshore power online by 2030. The project could power nearly 250,000 homes and create 1,200 local jobs during the construction phase. The onshore construction phase is

well underway, with the offshore phase set to begin in 2025. The project is expected to be in operation in 2026.

\$1.47 million was announced for Main Street RI Streetscape Improvements to be allocated to 10 projects for revitalizing main streets and downtown business districts. From Providence Now news, the following projects received funding:

- The Black Block Community Foundation in Pawtucket received \$150,000 to assist in the installation of large murals and other improvements to increase foot traffic and public art.
- The Blackstone Valley Tourism Council in Pawtucket received \$25,000 to support the implementation of a new wayfinding system.
- The City of Cranston received \$125,000 to help implement ADA-complaint walkways, more streetlighting for pedestrian safety, trash receptacles, and more.
- The Providence Downtown Improvement District received \$100,000 to help maintain and improve the cleanliness of the city.
- The Southside Community Land Trust received \$200,000 to help revitalize Haward Linden Plaza in Providence.
- The Block Island Chamber of Commerce received \$123,000 to expand the Mary D. Park.
- The Pawtucket Foundation received \$110,000 to fully light the interior of Pawtucket's Main Street Garage and to support the planned street conversion of 1-way roads to 2-way traffic.
- The Town of Burrillville received \$40,000 to invest into the Pascoag and Harrisville Redevelopment districts.
- The Town of Cumberland received \$350,000 to help expand upon the \$66M redevelopment of Ann & Hope Way.
- The Town of Lincoln received \$250,000 to improve pedestrian safety and implement ADA standard sidewalks as well as support landscaping improvements along sidewalks.

Through the Governor's FY2024 budget, Rhode Island Commerce is continuing the Site Readiness Program in which the state will partner with municipalities and/or developers to fund municipal technical assistance and site-specific planning and improvements.

- Site-Specific Improvements – Funding is available to support the planned or future development of specific sites. Activities funded may include:
 - Site specific planning and pre-development activities including property surveys, master planning, engineering surveys, or environmental studies

- Site-specific project improvements including activities that will support planned or future build-out of significant sites including infrastructure improvements, land assembly activities, site clearing or demolition, and building improvements
- Municipal Assistance – Program funding is also available to cities and towns to assist in the development of strategies and plans that spur development and growth in support of the municipality’s development goals. The activities could include:
 - LEAN Consultation to streamline current land-use development and permitting processes
 - Training/education for planning/zoning board members as well as building officials and inspectors
 - Assistance with writing zoning ordinances, updating a comprehensive plan
 - Providing strategic planning effort support (including matching funds or support for federal grants) or marketing support that will lead to the development or redevelopment of significant sites in a municipality.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

Stakeholders repeatedly emphasized the need for job training programs in order to keep the overall skill of the workforce meeting the standards of the area’s industries. The three occupations with the highest location quotient according to the BLS are Structural Metal Fabricators and Fitters, Textile Bleaching and Dyeing Machine Operators and Tenders, and Jewelers and Precious Stone and Metal Workers, suggesting that an investment in trade education statewide would be beneficial in terms of meeting these sectors’ employment needs.

As can be seen in nationwide trends, the state is dividing into a higher income knowledge economy and a lower income service economy. This divergence has been described as accelerating nationally and is mirrored in Rhode Island. Increasing differences in earning potential by occupation have long-term implications for the affordability of housing and rates of cost burden among renters and homeowners alike.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

It is the long-term goal of Rhode Island to create a pipeline of educated and skilled workers in hopes to attract more businesses to the state. Rhode Island’s Commerce Corporation offers the following statewide initiatives that are currently working toward this very important goal.

- Real Jobs RI – The Real Jobs RI initiative ensures that employers have the talented employees they need to compete and grow, while it provides targeted education and skills training for workers. By putting employers at the center of job training, everyone

wins. It's a win for employers who will have a pipeline of trained workers. It's a win for employees who will have a job once their training is complete. And it's a win for Rhode Island as the state looks to attract and grow more companies. Real Jobs RI puts people to work through employer-centered job-training efforts.

- 10,000 Small Businesses – 10,000 Small Businesses is a proven model for unlocking the growth and job-creation potential of small businesses. It provides a unique opportunity to move Rhode Island forward by strengthening local business – the backbone of the state's economy. 10,000 Small Businesses will build on the comprehensive package of tools the state has launched to support entrepreneurs, create jobs, and ensure everyone can make it in Rhode Island.
- CS4RI: Computer Science for Rhode Island – Rhode Island's students deserve the best opportunities in today's tech-driven economy, so the state is helping them get ahead by making sure every student, at every level, has access to the new basic skill: computer science. CS4RI is among the most comprehensive statewide computer science (CS) initiatives in the country, and will bring together a coalition of partners – including Microsoft TEALS, Code.org, Project Lead the Way, Brown University's Bootstrap, and University of Rhode Island's CS curricula for high school – to offer schools a menu of options for expanding computer science education in kindergarten through grade 12. Also, a nationally recognized provider of industry CS training, will collaborate to develop a pilot teacher CS boot camp offered in Rhode Island. CSRI will:
 - Give students the skills they need, starting in kindergarten, to be successful
 - Stop the brain drain by creating partnerships between schools and business to raise awareness about the opportunities open right now in Rhode Island
 - Help students get jobs that pay by giving them relevant 21st-century skills
 - Attract 21st-century business to Rhode Island by demonstrating a commitment to building a pipeline of trained and talented workers
 - Address disparities to ensure that everyone can succeed in Rhode Island

Describe any other state efforts to support economic growth.

See above.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The impact of housing problems in Rhode Island varies primarily by income level. However, the following income tiers experienced problems at a rate of at least ten percentage points higher than the State as a whole:

Housing Problems

- Asian households between 50% and 80% AMI

Severe Housing Problems

- Asian households with 0-30% and 50-100%AMI
- Hispanic households with 80-100% AMI

Cost Burden

- Asian residents with no/negative income (small sample size)

There is no current specific information on the locations of the highest concentrations of housing problems. However, the 2017 State of Rhode Island Housing Plan noted that many of the Lowest Quality tracts were in and around Providence. There were also pockets of Lowest Quality housing in tracts near Bristol, Westerly, Warwick, Burrillville, and Woonsocket.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

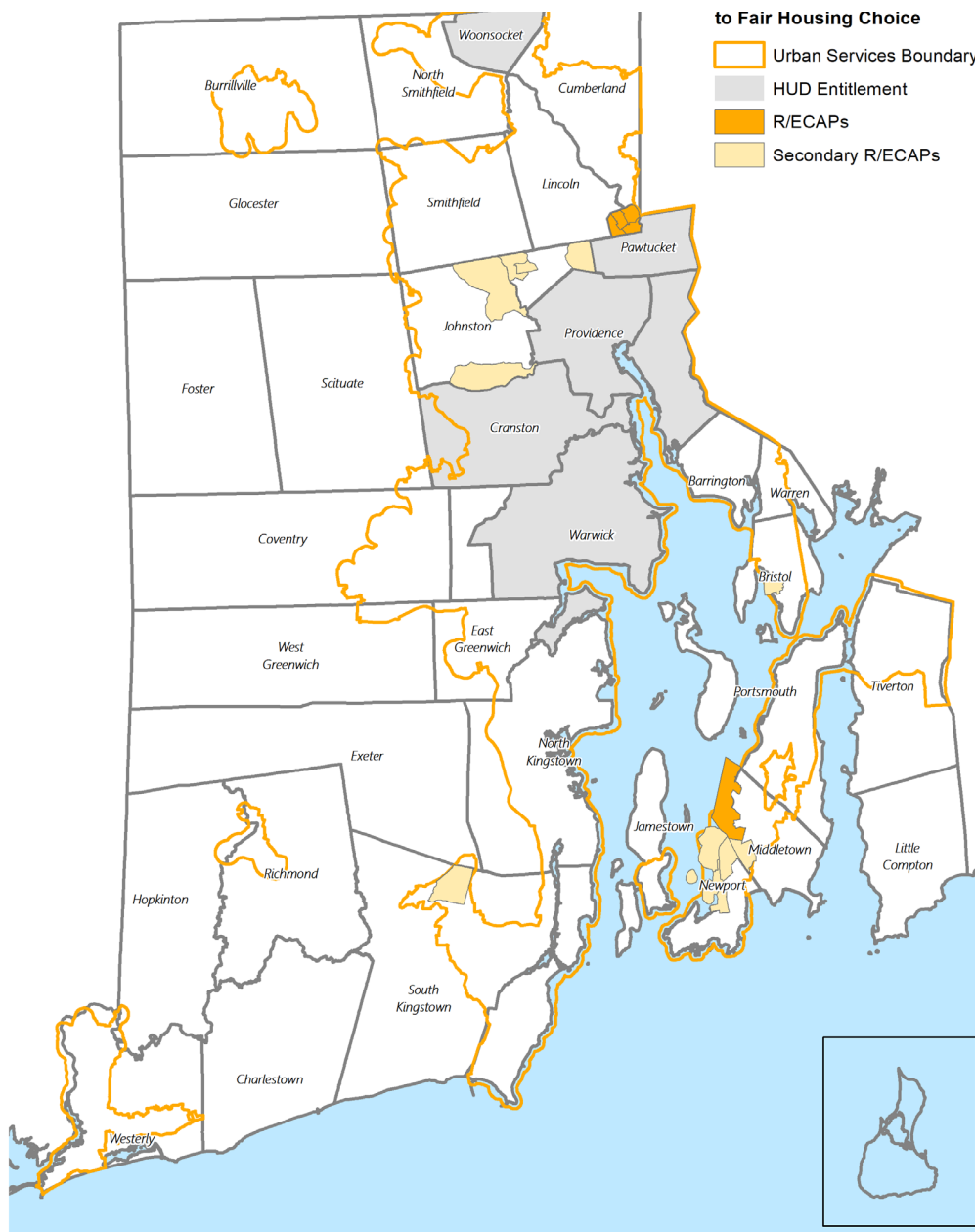
HUD defines R/ECAPs as census tracts with a non-White population of at least 50% (and 20% outside of metropolitan/micropolitan areas) and a poverty rate that either exceeds 40% or is three times the average tract poverty rate for the metropolitan/micropolitan area, whichever is lower. By combining these data, it is possible to determine geographic patterns where there are concentrated areas of poverty among minorities.

However, no census tract meets HUD's definition for R/ECAPs in RI Housing's jurisdiction. At most, a census tract would meet either the minority threshold or poverty rate threshold, but not both. To accommodate this limitation while still identifying areas that may have been historically impacted by past housing policy, the poverty threshold was redefined as census tracts whose poverty rate is above the 75th percentile (10.8%).

Using the modified definition of R/ECAPs, there are five census tracts (other than those in the entitlement cities) that meet the 50% minority threshold and have a poverty rate above the 75th percentile. These tracts are located in Central Falls and Middletown. Census tracts that

meet the modified poverty threshold and the lesser 20% minority threshold were also considered. Using this definition, an additional twelve census tracts were identified as secondary R/ECAPs and can be found in Bristol, Johnston, Newport, North Providence, and South Kingston.

Map 6 R/ECAPS in Rhode Island, 2022



Source: ACS 5-Year Estimates 2022

What are the characteristics of the market in these areas/neighborhoods?

By definition of R/ECAP, Central Falls is an area with one of the highest concentrations of non-white residents and highest concentrations of poverty. There has been an influx of Hispanic immigrants over the last decade, and in 2023 a majority of the population (69.3%) identified as Hispanic.

The municipality also filed for bankruptcy in 2011 and had to cut services and jobs in order to exit bankruptcy in 2012. In 2023, the median income for residents of Central Falls was \$45,921, roughly half of Rhode Island as a whole. The median housing value is \$300,500, and the median contract rent is \$954.

Central Falls was historically a textile producing town, but many of the textile factories shuttered throughout the 20th century as manufacturing moved overseas. Today, the town has a mix of industry, including textiles, wire wrapping, and plate glass manufacturing.

Middletown is a small beach town northeast of Newport in Newport County. Newport County as a whole has a population that is more educated and where more people own their homes than the rest of the United States.

The region has fewer jobs in the management industry, but more in Art, Entertainment, and Recreation, jobs that historically pay lower wages and are less stable than jobs in other industries. Middletown is part of the Greater Newport Chamber of Commerce, one of Rhode Island's largest business advocacy organizations. In the Chamber's 2021 Greater Newport Regional Economic Development Plan, they report that the nonprofit's purpose is to "leverage the region's core assets to find solutions in the areas that matter most to the business community: quality jobs, quality growth, and quality of life." Greater Newport's major economic sectors include tourism and national defense.

Are there any community assets in these areas/neighborhoods?

Central Falls has several restaurants and green spaces and emphasizes its history as a textile mill town by preserving many of the old mills as historical sites for residents and tourists to explore. River Island Campground is a 4-acre camping site along the Blackstone River with scenic views and opportunities for fishing, kayaking, and canoeing and walking trails, and Jenks Park is home to 4.5 acres of natural landscape as well as Cogswell Tower, the Town's most recognizable landmark. A new MBTA transportation stop has also been added nearby.

Perhaps Middletown's greatest community assets are their parks and beaches. Sachuest Beach is a South-facing, mile-long beach with a campground, concession stands, and other features that attract visitors during the summer months. Third Beach is a family-friendly East-facing

beach with fewer waves that overlooks Third Beach Harbor. Additionally, a new Naval Operations Support Facility has opened in Middletown. This facility has affected the housing situation as employees in their families secure housing nearby.

Are there other strategic opportunities in any of these areas?

Middletown's status as a tourist area means that housing can be particularly expensive. According U.S. News and World Report, Middletown High School is ranked highly among the nation's High Schools and test scores are consistently above the rest of Rhode Island in Mathematics, Reading, and Science. Given that a large portion of the region's jobs consist of lower-paying entertainment, food service, and recreation jobs, there is an opportunity to create more affordable housing for the Town's workers where there are high quality schools.

Rhode Island's Analysis of Impediments to Fair Housing (AI) contains more information on specific areas of opportunity.

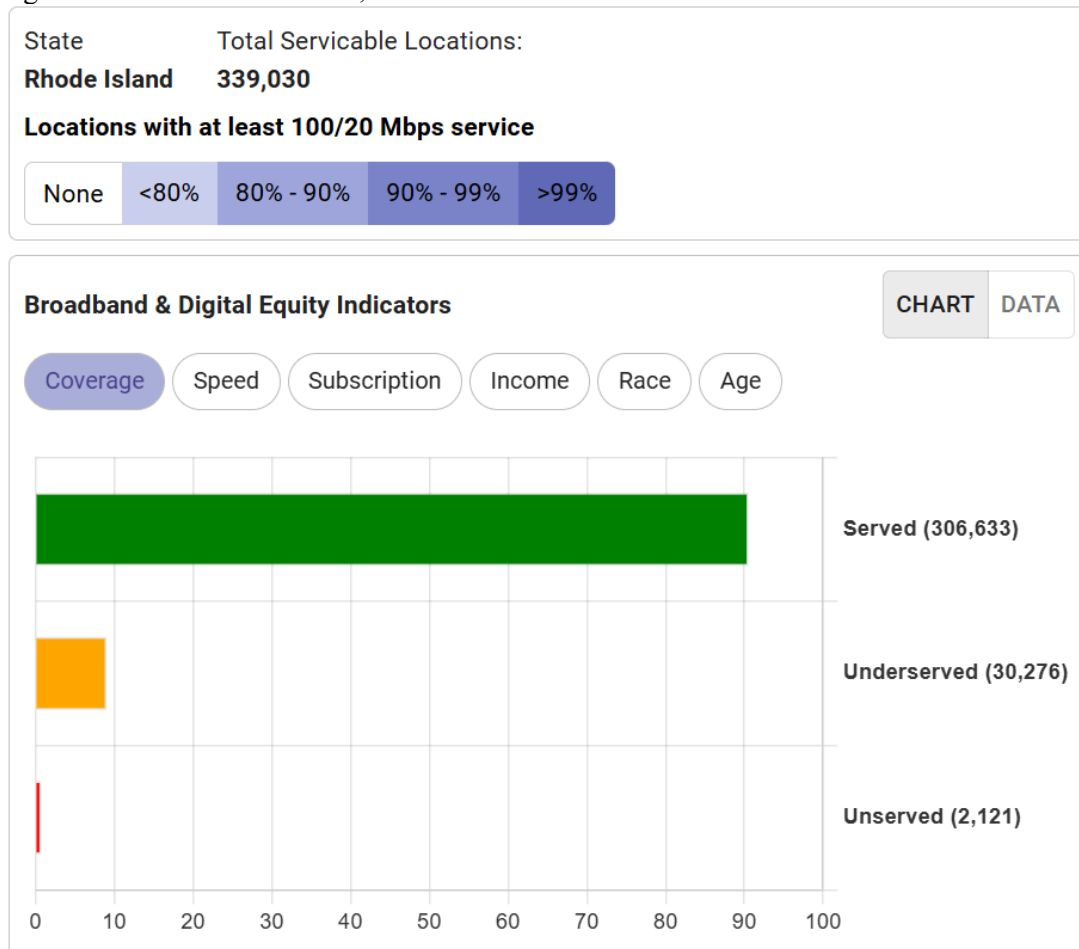
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Per HUD guidance, all Consolidated Plans submitted after January 1, 2018, must address broadband needs within the jurisdiction. Below is a chart and map from Connect RI outlining Rhode Island's access to broadband providers. The speeds identified are 100/20 Mbps service.

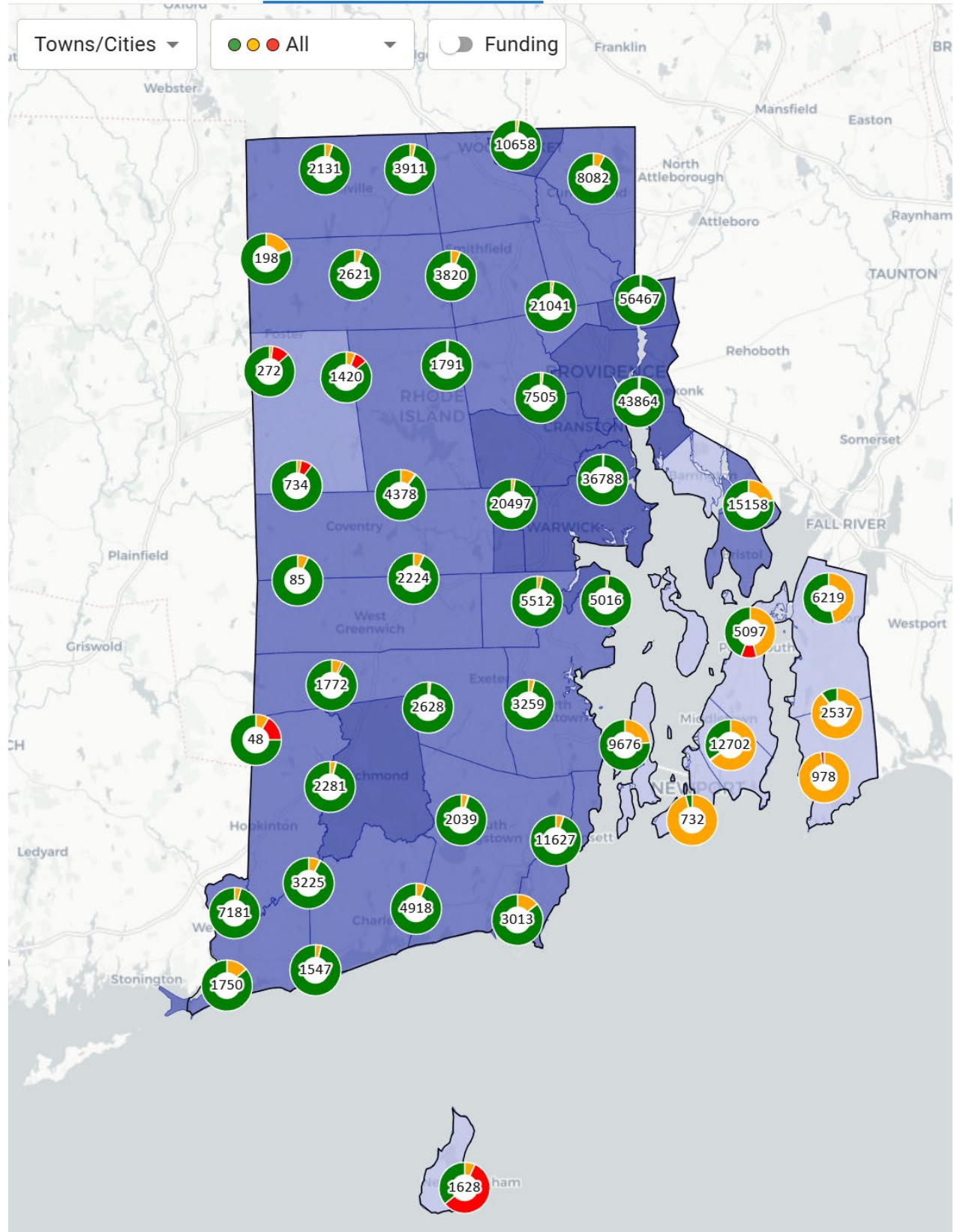
Broadband access is often viewed to connect to education, commerce, and a wider community-at-large. It is increasingly becoming a requirement for all households to effectively engage with markets and resources. According to ConnectRI's Rhode Island Broadband and Digital Equity Strategic Plan, one of the State's goals is to expand fiber optic infrastructure into unconnected areas. Further, for low- and moderate-income households, broadband affordability is an issue.

Figure 1 Broadband Indicators, Rhode Island



Source: ConnectRI

Map 7 Household Broadband Connectivity



Source: ConnectRI

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Due to high population density and location in the North East corridor, Rhode Island has broadband competition statewide. The majority of regions throughout the state have between 3-4 broadband providers.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Rhode Island has experienced its share of natural disasters in recent years. According to the Rhode Island Hazard Mitigation Plan, a natural hazard is defined as an event or physical condition that has the potential to cause fatalities, injuries, property and infrastructure damage, agricultural loss, damage to the environment, interruption of business, or other types of harm or loss.

The state of Rhode Island has become a national leader in addressing climate change. By aggressively working to combat climate change and protect itself from coastal effects, Rhode Island has created stronger, safer, and greener communities for future generations. Governor McKee has established aggressive goals regarding emissions, including:

- 45% below 1990 levels by 2030
- 80% below 1990 levels by 2040
- Net-zero emissions by 20250

An executive order was also signed in 2020 for advancing a 100% renewable electricity future for Rhode Island by 2030. In 2022, the General Assembly enacted a Renewable Energy Standard of 100% by 2033.

According to the 2024 RI Hazard Mitigation Plan, the State is at High risk of flooding, severe winter weather, and tropical/extratropical storms. As a coastal State, these risks are especially heightened in Rhode Island.

In 2024, DEM (Department of Environmental Management) took several actions to combat climate change, including:

- Advancing the Act on Climate
 - With support from DEM staff, the Rhode Island Executive Climate Change Coordinating Council (EC4), chaired by DEM Director Terry Gray, approved the FY 2025 Spending Plan allocating \$1,660,000 across state agencies to support continued implementation of the Act on Climate.
- Reducing Emissions
 - In 2024, OAR awarded over \$1M in Diesel Emission Reduction Act (DERA) grants to private companies, municipalities, and marine vessel operators to replace dirty diesel engines with cleaner engines.

- DEM received \$1.3M in Inflation Reduction Act (IRA) grants and a Congressional Earmark to replace and upgrade existing air quality monitoring equipment, purchase portable air monitoring equipment, locate new monitoring sites, and locate low-cost sensors in several communities across Rhode Island to help protect the air we breathe.
- Bolstering Climate Resiliency
 - In October, DEM received a nearly \$15.5M Federal Emergency Management Agency (FEMA) Hazard Mitigation Grant Program award critically supported through the Rhode Island Emergency Management Agency (RIEMA) – the largest grant ever received by Rhode Island through the program with a 10% state match from RI Capital Plan Funds. These funds will be used for an over \$17.2M project to elevate structures at the Port of Galilee in Narraganset, Wickford Dock, and replace eight docks at Galilee, DEM’s Division of Marine Fisheries’ Jerusalem facility, and DEM’s Division of Law Enforcement’s Wickford Marine Base to improve resilience to the increasing impacts of climate change. These improvements at the Port of Galilee will ensure that it remains a vibrant working waterfront for the commercial fishers who berth there and the many commercial crews up and down the Atlantic Coast.
 - In October, DEM awarded over \$1M in Climate Resilience Fund (CRF) awards for statewide climate resilience projects to help RI communities safeguard vulnerable coastal habitats from the effects of climate change so we have a resilient Ocean State for future generations.
 - The Pocasset River is a 26-square mile urban watershed in Rhode Island located to the south of Providence, which has been built out, resulting in major flood risk in these low-lying neighborhoods. The USDA Natural Resources Conservation Service (NRCS) is conducting a program wherein they are conducting voluntary buyouts to demolish and restore these watersheds. The program will be funded by Watershed and Flood Prevention Operations (WFPO) Program and look to buy over 100 properties.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The changing conditions in Rhode Island have an impact on the future vulnerability of population, property, and the environment from natural hazards. In addition to the physical structures being threatened by natural disaster, the cost of housing will increase as frequency of extreme weather events—such as floods, hurricanes, etc.—increases. Already-expensive housing will become even more unaffordable as accessory expenses such as property insurance increase.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan outlines the State of Rhode Island's plan for allocating HUD entitlement grants and identifies local priorities within the regional context. Informed by qualitative and quantitative data gathered through citizen participation and consultation with stakeholders throughout the state, market analysis, and an assessment of U.S. Census and other local data that reflect statewide needs, the Strategic Plan identified the highest priority needs toward which to direct grant dollars. The following goals were identified to meet these high-priority needs (in no particular order or ranking):

Goal 1: Develop and Preserve Existing Stock of Affordable Housing: Create affordable housing through new construction and rehabilitation for homeowners and renters, including permanent supportive housing, and preserving existing affordable housing with expiring affordability restrictions.

Goals 2: Prevent and End Homelessness: Increase opportunities for housing stability through tenant-based rental assistance, rapid rehousing, overnight shelter services, and other support. Assist homeless individuals and families to stabilize permanent housing after experiencing a housing crisis by providing client-appropriate housing and supportive service solutions. Provide homeless households with rapid rehousing rental assistance to move them as quickly as possible into permanent housing.

Goal 3: Improve Health, Safety, and Efficiency of all Homes: Rehabilitate and preserve owner- and renter-occupied housing to bring units to code standard to provide safety improvements, energy efficiency improvements, access modifications, or treatment of lead or other home hazards.

Goal 4: Non-Housing Community Development: Enhance publicly owned facilities and infrastructure, such as parks, streets, sidewalks, streetscapes and other public infrastructure and facilities. Increase access to jobs, education, health and wellness, recreation, and health and social service activities. Enhance economic stability and prosperity by increasing economic opportunities for residents through job readiness and skill training, promotion of entrepreneurship, and other strategies.

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Rhode Island does not have specific designated geographic target area priorities, but it does encourage investments for all HUD CPD grant programs to be targeted toward areas of a high level of need.

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

CDBG -The State Community Development Block Grant (CDBG) program is intended to develop viable communities by providing decent housing, expanding economic opportunities and creating suitable living environments – primarily for low/moderate income persons (those earning at or below 80% of Area Median Income).

The CDBG program is governed by regulations of 24 CFR Part 570. Under these guidelines, the State manages the program for those 33 Rhode Island municipalities which do not receive an allocation directly from HUD. The Cities of Cranston, East Providence, Pawtucket, Providence, Warwick and Woonsocket are all entitlement communities that receive CDBG allocations directly from HUD and operate their own programs independent of the state effort. By regulation, the State may only distribute funds to general local government. These communities may, however, distribute funds to non-profit and other entities to undertake eligible activities.

Regardless of the eligibility of a municipality or consortium to apply for funds, allocation amounts are contingent to two other geographic considerations. First is the need of that community and second is the project's location with relation to the Urban Services Boundary and its proximity to a growth center, which were defined in the State's *Land Use 2025* Guide Plan.

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

HOME Investment Partnership (HOME) program funding for development activities is available to all communities in the State, with the general exception of Providence, Pawtucket and Woonsocket, which receive HOME allocations directly from HUD. However, applicants from

these three communities may be eligible for state HOME funding for development activities if the entitlement entities do not have funds available for a specific activity and the City can document that it has obligated all the funds it had previously budgeted for that activity. The scoring system used to determine the geographic areas of the state where HOME will be expended for development activities favors communities with the lowest percentage of affordable housing units to encourage a more balanced distribution of affordable housing throughout the state.

The Housing Trust Fund (HTF) program funding is available to all communities in the state. However, priority will be given to communities who have yet to meet or exceed state requirements that at least 10% of housing stock is affordable. Geographically based distribution criteria for HTF funds also include factors that contribute to improving or sustaining economic opportunity for the future tenants or owners of the homes developed. These criteria include additional points for proximity to transit, employment centers, high performing schools and to community services.

The State's Emergency Solutions Grant program is combined with entitlement ESG funds (Pawtucket, Providence and Woonsocket), federal Title XX homeless funds and state homelessness resources to distribute funds through one application process in a partnership known as the Consolidated Homeless Fund. The entitlement ESG funds, though combined with non-entitlement resources, are allocated only to their entitlement communities, with state ESG funds usually being distributed to facilities and services provided in non-entitlement communities. Geographic distributions of funding are estimated annually based on the location of programs that have been funded in the past and the statutory requirement of entitlement ESG funds going to each respective entitlement community. Because other funding sources are earmarked for the entitlement communities, the state's ESG funds often fund programs in Southern Rhode Island, Kent County and the East Bay, but this is not a requirement of state ESG distribution.

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

Table 45 – Priority Needs Summary

1	Priority Need Name	Increase Housing Opportunities for Low- and Moderate-Income Households
	Priority Level	High
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	Statewide
	Associated Goals	Develop and Preserve Affordable Housing; Improve Health, Safety, and Efficiency of all Homes
	Description	The Needs Assessment finds that renter and homeownership housing that is affordable to households earning at or below 80% of AMI is substantially less than the number of households at this income level
	Basis for Relative Priority	Data revealed that shortages of affordable and available housing for the State's low-to-moderate income households for both owners and renters. The greatest shortages occur among the state's extremely low-income renters and owners.
2	Priority Need Name	Preserve Existing Affordable Housing
	Priority Level	High
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	Statewide
	Associated Goals	Develop and Preserve Affordable Housing
	Description	The state's subsidized affordable homes are restricted to households that earn certain percentages of the relevant area median income. Many of these affordable homes are at risk of losing this restriction.
	Basis for Relative Priority	In the next five years, about 500 assisted housing units face expiring periods of affordability and will need to be preserved through negotiations with the current owners; many will require more investment. The state's public housing stock and its share of rental vouchers are constantly at risk due to declining housing assistance budgets and thin operating margins.
3	Priority Need Name	End Homelessness
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Rural, Chronic Homeless, Individuals, Families with Children, Mentally Ill, Chronic Substance Use, Persons with HIV/AIDS, Survivors of Domestic Violence, Unaccompanied Youth, Veterans

	Geographic Areas Affected	Statewide
	Associated Goals	Prevent and End Homelessness
	Description	Homelessness unfortunately affects close to 4,000 Rhode Islanders every year. Children, the elderly, the mentally ill and the disabled are among those that experience homelessness annually, sub-populations likely in need of supportive services and rely on public or fixed incomes. It is a priority of the homeless system in Rhode Island to make sure someone experiencing homelessness is matched with services and opportunities that prevent recidivism to homeless facilities. Rhode Island has a large share of its population that are Veterans. In a state that takes such pride in its military services, no former service member should experience homelessness, and cooperation with VA and other veteran services must improve to achieve this end.
	Basis for Relative Priority	Overall, more than 2,400 persons experienced homelessness in Rhode Island on any given night throughout 2024, with 877 of those being families with children. There were also 130 homeless Veterans in the 2024 PIT Count.
4	Priority Need Name	Adapt Aged Housing to Fit Resident’s Needs
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Elderly, Frail Elderly, Persons with Physical Disabilities
	Geographic Areas Affected	Statewide
	Associated Goals	Develop and Preserve Affordable Housing; Improve Health, Safety, and Efficiency of all Homes
	Description	Low-income households and many susceptible sub-populations (elderly, disabled) face limited housing choice in older homes because of their low or fixed incomes. Many homes that are available to these households are in suboptimal condition and present hazards to their health and safety.
	Basis for Relative Priority	Rhode Island’s housing stock continues to age at a steady increase. Rhode Island has the third oldest housing stock in the country, with many houses built before 1940. In addition, 18.3% of the population is over the age of 65. Many seniors live in homes that are not suitable for their needs in terms of condition or suitability.
5	Priority Need Name	Eliminate Lead Hazards
	Priority Level	High
	Population	Families with Children
	Geographic Areas Affected	Statewide

	Associated Goals	Improve Health, Safety, and Efficiency of all Homes
	Description	Research shows children under 6 are at the highest risk of irreversible damage as a result of elevated blood-lead levels.
	Basis for Relative Priority	Estimates show that 303,311 households live in housing built before 1980 and 23,870 of those households have at least one child under 6 years old. Analysis from Department of Health data on lead levels in the blood of children under the age of 6 showed that over 2.4% of those tested above 5 mcg/dL in 2023.
6	Priority Need Name	Make Infrastructure Improvements
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Statewide
	Associated Goals	Address Non-housing Community Development Needs
	Description	Invest in key infrastructure such as streets, sidewalks and open space (recreation) in distressed areas. Investing in water/sewer projects is essential to achieving community development and housing objectives. Invest in improving neighborhoods by addressing the myriad of housing and community development needs essential to their revitalization.
Basis for Relative Priority	Economic development hurdles include a lack of water and sewer infrastructure outside of the urban core and the overall poor condition of the state’s infrastructure; limited developable land and the development constraints that exist for remaining land (e.g. brownfields and other environmental constraints), and funding threats to public transit services in and around Rhode Island.	
7	Priority Need Name	Make Investments in Public Services and Facilities
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Statewide
	Associated Goals	Address Non-housing Community Development Needs
	Description	Investments in neighborhood-based services and facilities, such as recreational facilities, roof replacements and handicap improvements at community buildings, walkability investments, as well as social, medical, educational and employment services.

	Basis for Relative Priority	Section NA-50: Non-Housing Community Development Needs lists the common needs shared among municipalities, including investments in: essential services and facilities, particularly for special needs populations such as the homeless and elderly/disabled; providing job training/employment opportunities for low- and moderate-income persons; and improving neighborhoods by addressing the community development needs essential to their revitalization.
8	Priority Need Name	Develop Permanent Supportive Housing
	Priority Level	High
	Population	Extremely Low, Low, Moderate Income
	Geographic Areas Affected	Statewide
	Associated Goals	Provide Tenant Based Rental Assistance
	Description	According to Housing 2030, the State’s current draft housing plan, the goal is to produce 375 PSH units by the end of 2030. The activities of the 2025-2029 5-Year Plan Cycle will contribute in part to achieving this goal. PSH provides subsidized housing and supportive services on a permanent basis to those with chronic disabilities and extremely low incomes.
	Basis for Relative Priority	Increasing the supply of permanent supportive housing is a key strategy for reducing homelessness, particularly for populations with special needs.
9	Priority Need Name	Remove Barriers to Fair and Affordable Housing
	Priority Level	High
	Population	Extremely Low, Low, Individuals, Families with Children
	Geographic Areas Affected	Statewide
	Associated Goals	Develop and Preserve Affordable Housing, Prevent and End Homelessness
	Description	Almost all aspects of the preservation and development of affordable housing further Fair Housing goals, in that it expands housing choice. Barriers to fair and affordable housing also prevent households from fully accessing the existing housing stock.
	Basis for Relative Priority	There are many factors that may inhibit someone from accessing fair housing that involve cost to residents, landlords, and developers. Costs to residents may involve paying multiple application fees even though a unit is not secured, landlord costs involve making reasonable accommodations to persons with disabilities, and developer costs involve zoning permits, conforming to design standards, and tax policies.

10	Priority Need Name	Increased Transitional Housing for Persons in Recovery with Substance Abuse Disorder
	Priority Level	Moderate
	Population	Extremely Low, Low, Moderate Income
	Geographic Areas Affected	Statewide
	Associated Goals	Prevent and End Homelessness; Improve Health, Safety, and Efficiency of all Homes
	Description	Providing rental assistance and/or rehabilitation of units for persons in recovery with substance abuse disorders.
	Basis for Relative Priority	The Needs Assessment finds that a significant portion of both sheltered and unsheltered homeless persons are suffering from chronic substance abuse.

Narrative (Optional)

Ten (10) priority needs have been identified as the focus of this Consolidated Plan period. These ten needs are not the only needs related to housing and community development in the state, but they have been identified as being the most significant area requiring state investment and support.

Priority Needs 1 and 2 address the need to increase the stock of homes affordable to low- and moderate-income Rhode Islanders.

Priority Needs 4 and 5 address the health, safety and suitability of the state’s aging housing stock. The presence of neglected structures as a result of foreclosure or vacancy also disproportionately affects low-income neighborhoods. The Rhode Island Alliance for Healthy Homes, a local initiative supported by the National Green and Healthy Homes Initiative, will be a major partner in the next five years in helping the state educate policymakers and leverage funds to improve the state’s housing stock.

Priority Need 3 and 10 focus on the needs of two special needs populations, homeless persons and persons in recovery from substance abuse disorder. Strategies, goals and outcomes described in Rhode Island’s homeless population. Specific strategies, goals and outcomes for ending and preventing homelessness are described in the SP-45 Goals section of this Strategic Plan.

Priority Needs 6 and 7 both describe the importance of state investment in public infrastructure and services that are crucial to state, regional and local economies. Investments in sidewalks, green and grey infrastructure, and parks in areas of concentration of poverty, and services and facilities for populations in need, such as the disabled or elderly, stimulate economic

development and support more sustainable development patterns.

Priority Need 9 reflects Rhode Island's statewide interest in ensuring equal access to safe and affordable homes that meet the needs of Rhode Islanders. State law provides even broader fair housing protections than federal law. A strong policy to ensure affordable and fair housing is needed now more than ever.

Priority 8 summarizes the priority housing and supportive service needs of elderly and disabled persons in need of supportive housing. In the Needs Assessment, it was found that the state's oldest housing stock is predominantly occupied by elderly or disabled persons, many of whom earn less the area median income. Because of these needs, the state places a high priority on creating more permanent supportive housing, with specific objectives included in the goals, strategies, actions, and proposed outcomes of this Consolidated Plan.

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Because of the overwhelming need for housing subsidies for persons below 80% AMI and the limited availability of Housing Choice vouchers, the State will be continuing to improve its tenant-based rental assistance programs to help close these gaps. RI Housing prioritizes vouchers for currently and at-risk homeless, while other PHAs prioritize different groups, such as disabled households. TBRA may be expanded to support persons in recovery housing.
TBRA for Non-Homeless Special Needs	Finding community housing for those exiting institutions is a high priority for the State as is providing housing for individuals with disabilities. Both groups tend to be at the lowest income levels (0-30% AMI). Housing problems affect lower income households disproportionately for the subpopulation of total households with at least one disability, according to the 2017-2021 CHAS data. Of all extremely low-income households that face at least one housing problem, just under 60% have at least one disability, with the most common limitation being a condition that limits physical activities (ambulatory).
New Unit Production	There are currently 3 times as many households within the 0-30% AMI income tier as units available. Though the comprehensive permit process provides incentives for developers to include 25% set-asides for affordable housing, there simply isn't enough building taking place in the private market to produce the needed affordable housing. The State intends to fund the production and preservation of 1,844 units over the course of the next 5 years through HOME, HTF, CDBG and other funding sources.
Rehabilitation	The state's apparatus for lead-based paint abatement, weatherization, and other healthy housing work that reduces risks of asthma and other physical injuries is robust and improving in its practice every year. However, there are nearly 303,000 housing units in the state that were built before 1979. Just under 23,000 of these households have a child under the age of 6, which is the age range at the highest risk of sustaining permanent damage as a result of lead-based paint poisoning. Given the age of Rhode Island's housing stock (3rd oldest overall, oldest rental housing stock in nation) there is a large need throughout the state for owner and rental rehabilitation. This includes assisted properties that may be aging out of their affordability covenants.
Acquisition, including preservation	According to the ACS 5-Year Estimates for 2023, Rhode Island has a 9.8% vacancy rate for all housing units, including both owner- and renter-occupied units. The acquisition, completion, and sale or rental of these properties will be a high priority throughout the State. 2019-2023 ACS data counted over 47,713 vacant and abandoned housing units. Not all, but certainly some of these could prove valuable to acquire for the purpose of developing practical proposals for development.

Table 46 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

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

Addressing the ten priority needs summarized in the SP-25 Priority Needs table relies on the resources summarized in this Strategic Plan, and the strategy in which each need will be addressed over the next five years by one or more of the strategic goals described in most detail in SP-45 Goals section.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-Federal	Acquisition Admin & Planning	\$5,755,637	\$0	\$0	\$5,755,637	\$23,022,548	

		Economic Development Housing Public Improvements Public Services						Funds community development and housing activities.
<i>HOME</i>	Public-Federal	Multifamily rental new construction Multifamily rental rehab	\$3,557,637.50	\$0	\$1,000,000	\$4,577,637.50	\$14,230,550	Acquisition, rehabilitation and new construction of affordable housing.
<i>ESG</i>	Public-Federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance services Transitional housing	\$743,402	\$0	\$0	\$743,402	\$2,973,608	Emergency shelter and operational support for homelessness program funding, TBRA/Rapid Rehousing
<i>HTF</i>	Public-Federal	Acquisition Admin & Planning Multifamily rental new construction Multifamily rental rehab	\$3,001,259.36	\$0	\$0	\$3,001,259.36	\$12,005,037.44	Acquisition, rehabilitation and new construction of affordable housing, primarily targeting households earning 30% of AMI or less.

<i>RHP</i>	Public-Federal	Rental Assistance services	\$1,218,265	\$0	\$0	\$1,218,265	\$4,873,060	Funds stable transitional housing for individuals in recovery from substance-use disorders.
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Table 47 - Anticipated Resources

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

State HOME Program: Historically, the state’s HOME program for non-entitlement communities, which has received nearly \$100 million since 1992 to develop affordable rental and homeownership opportunities in the state, has leveraged \$6.39 for every \$1 of HOME funds spent on rental activities.

HOME applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. No federal funds are counted as match, only state and private funds are considered. Sources contributing to the development of HOME-assisted projects include market rate bank financing, private foundation grants, private donations, State of Rhode Island Building Homes RI, lead hazard reduction funds (state), Thresholds Program funds and. In the upcoming planning period, the state anticipates continuing its 10 to 1 leveraging ratio due to the sustained high levels of total development costs and the limited other federal capital subsidies for affordable housing development, which will also continue to far exceed match requirements.

State CDBG Program: After the first \$100,000, administrative expenses must be matched dollar for dollar. The match for CDBG is provided by State support of staff and expenses necessary for the administration of the CDBG program. Currently, the salary and fringe for the State’s CDBG Recipient Review Specialist is wholly supported with State funds – meeting most of the matching requirement.

State ESG Program: After the first \$100,000, all expenses must be matched dollar for dollar. The State meets matching requirements for the ESG program by support of homeless shelter and service programs with non-McKinney sources resources. The State has created a Consolidated Homeless Fund, which combines federal, state and local resources available for homeless shelter/services into a single program. Approximately one-third of this program is ESG with the remaining two-thirds supported by the Housing Resources Commission and Department of Human Services, Title XX homeless programs.

HTF Program: As with the HOME program, Hosing Trust Fund applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. No federal funds are counted as match, only state and private funds are considered. Sources contributing to the development of HTF-assisted projects are identical in origin to those which may serve as match under the HOME program.

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

State owned property that addresses the needs identified in the Consolidated Plan includes Harrington Hall, the state's largest men's shelter, located on the property of BHDDH's Pastore Complex. It functions as a low-barrier Rapid Assessment and Rehousing Center striving to move people out of emergency shelter and into stable housing as quickly as possible. Crossroads Rhode Island manages the shelter and uses a Housing First approach to service delivery. Harrington Hall typically serves 100-112 men each night (more in the colder months) in this 112-bed facility.

Discussion

SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
<i>RI Housing and Mortgage Finance Corporation (RI Housing)</i>	Public Institution	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental	State
<i>State of Rhode Island Executive Office of Housing</i>	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental	State
<i>Rhode Island Statewide Planning Program</i>	Government	Planning	State
<i>RI Department of Behavioral Healthcare, Developmental Disabilities and Hospitals</i>	Government	Homelessness Non-homeless special needs Public Facilities Public Services	State

Table 48 - Institutional Delivery Structure

Assessment of Strengths and Gaps in the Institutional Delivery System

Strengths include established relationships, coordination of state efforts under RIEOH, etc. Gaps include consistent capacity and resource limitations at state, local, and non-profit level.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement			
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X		
Education	X	X	X
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Other	X	X	X

Table 49 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

Rhode Island has adopted a Housing First policy as the most effective solution for ending homelessness. Therefore, the focus for the homeless is first on providing housing, and then offering services and supports that meet the needs of program participants.

The institutions described in the targeted services table above, all sponsor federally funded programs that provide services to homeless persons, persons with HIV, persons at risk of homelessness and disabled or mentally ill persons in need of services to remain stably housed. Additionally, there are more than 40 sub-organizations that provide services to homeless persons and persons with HIV in the state either as sub-recipients of federal grant funding or through privately raised funding. The two federal grant programs that largely serve these populations are the Consolidated Homeless Fund (CHF) and the Continuum of Care (CoC) program.

The Consolidated Homeless Fund has brought together various resources available to support homeless programs into a single, coordinated effort. The CHF includes:

- Pawtucket Emergency Solutions/Shelter Funds
- Providence Emergency Solutions/Shelter Funds
- Woonsocket Emergency Solutions/Shelter Funds
- State of Rhode Island Emergency Solutions/Shelter Funds
- Title XX Shelter/Homeless Service Funds
- Housing Resource Commission Shelter/Homeless Service Funds

CHF provides grant funds to units of general local government and non-profit organizations that provide services to the homeless. Units of general local government and non-profit organizations are encouraged to apply for funding for one or more of the following eligible activities:

- Housing Problem Solving,
- Street Outreach,
- Regional Access Points,
- Emergency Shelter,
- Rapid Rehousing,
- Supportive Services, and
- Systems projects.

More than 4,000 persons annually find themselves in a homeless shelter or a place not meant for human habitation. Although the CHF program does not provide direct support to individuals and families who are homeless, this population is almost exclusively served by programs supported by the Consolidated Homeless Fund.

In permanent supportive housing settings, funded most often through CoC programs, residents sign leases, pay rent and care for their own apartments, which is an important step for these

homeless households to begin to regain self-confidence and control over their lives. They also receive case management and support services like those provided by CHF programs.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

A strength of the service delivery system for special needs population and persons experiencing homelessness is the responsibility sharing among agencies and funding mechanisms: The Rhode Island Executive Office of Housing administers the Consolidated Homeless Fund, which serves those persons in need of emergency shelter facilities or transitional housing. BHDDH administers federal and state funding for the purpose of properly serving those households with serious health and disability needs that could result in homelessness. Thus, these agencies serve needy populations, but these populations have different levels of need and are different stages of reaching housing stability.

A strength of the service delivery system especially for persons experiencing homelessness has been the ability of both transitional housing and permanent supportive housing service providers and case managers in achieving earned income at exit and mainstream benefits sign up achievements.

Gaps of the institutional service delivery system include: the need to move those that no longer need supportive services in transitional or permanent supportive housing into mainstream subsidized or unsubsidized housing and preventing homelessness recidivism. The lack of available affordable units compounds this issue. Stakeholders have also reported a need for increased coordinated case management services and personnel.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Housing retention services: In order to increase housing retention services, case managers will be able to continue to work with clients through the housing and transfer of services that are supported by Medicaid waiver funding.

Use of peer mentors: The Peer Recovery Services program, supported by the Medicaid waiver, encourages the employment of formerly homeless individuals to assist in connecting newly housed homeless persons to community supports. All of these strategies relate to an observed gap in the institutional focus to move those that no longer need the supports associated with permanent supportive housing to mainstream housing.

Certified Community Behavioral Health Clinics (CCBHCs) A CCBHC is an outpatient clinic that is certified by the State of Rhode Island to offer expanded behavioral health services. This initiative, launched by RI EOHHS in October 2024, is a response to gaps that existed in RI's behavioral health system. CCBHCs serve anyone who walks through the door, regardless of age, diagnosis, or insurance status. At a CCBHC, a team of trained health professionals can provide many types of behavioral health supports, including 24/7 mobile crisis support.

Employment first: The Employment First Program promotes community-based, integrated employment as the first option for employment services for individuals with disabilities and behavioral health issues. Administered by BHDDH, Employment First provides State funds to support employment services offered by licensed providers through Community Mental Health centers or behavioral health organizations.

Rapid Re-Housing: Rhode Island Consolidated Homeless Fund will be used to fund rapid re-housing in 2025. The state's ESG allocation goes to support the intensive housing stabilization program (IHSP) as part of the Consolidated Homeless Fund. In total, these rapid re-housing programs will assist approximately 70 families in 2025 (all rapid re-housing programs in Rhode Island will serve homeless or at-risk families). This targeting of homeless families with rapid rehousing program will also include participation in the coordinated access system among all service providers in order to ensure that the most in-need families receive services.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1.	<i>Develop and Preserve Affordable Housing</i>	2025	2029	Affordable Housing Public Housing	Statewide	Increased housing opportunities for LMI households Preserved affordability of the state’s LMI stock Aged housing fitted to residents’ needs Permanent Supportive Housing	CDBG: \$12,336,680.00 HOME: \$17,788,187.50 HTF: \$15,006,296.80	Rental units constructed or Rehabilitated: 250 Homeowner Housing Added: 50
2.	<i>Prevent and End Homelessness</i>	2025	2029	Homeless	Statewide	Ending Homelessness Permanent Supportive Housing	ESG: \$3,717,010 HOME-ARP: \$2,500,000	Tenant-based rental assistance/Rapid Rehousing: 1,250 Homeless Person Overnight Shelter: 15,000

								Overnight/Emergency Shelter/Transitional Housing Beds added: 120 Homelessness Prevention: 30 Housing for Homeless added: 105
3.	<i>Improve Health, Safety, and Efficiency of all Homes</i>	2025	2029	Affordable Housing Homeless Non-Homeless Special Needs	Statewide	Increased housing opportunities for LMI households Aged Housing Fitted to Residents Needs Elimination of lead-based paint hazards Permanent Supportive Housing	CDBG: \$12,336,680	Homeowner Housing Rehabilitated: 375
4.	<i>Non-Housing Community Development</i>	2025	2029	Non-Housing Community Development	Statewide	Infrastructure Improvements	CDBG: \$8,224,450	Public Facility or Infrastructure Activities other than Low/Moderate

						Investments in Public Services and Facilities Investments in Job Training and Employment		Income Housing Benefit: 75,000 Public Service Activities other than Low/Moderate Income Housing Benefit: 3,750
5.	Planning and Administration	2025	2029	Planning and Admin	Statewide	Planning and Administration	CDBG: \$1,363,345	Planning and Admin

Table 50 – Goals Summary

Goal Descriptions

Develop and Preserve Affordable Housing: Create affordable housing through new construction and rehabilitation for homeowners and renters, including permanent supportive housing.

Prevent and End Homelessness: Increase opportunities for housing stability through tenant-based rental assistance, rapid rehousing, overnight shelter services, and other support. Assist homeless individuals and families to stabilize permanent housing after experiencing a housing crisis by providing client-appropriate housing and supportive service solutions. Provide homeless households with rapid rehousing rental assistance to move them as quickly as possible into permanent housing.

Improve Health, Safety, and Efficiency of all Homes: Rehabilitate and preserve owner- and renter-occupied housing to bring units to code standard to provide safety improvements, energy efficiency improvements, access modifications, or treatment of lead or other home hazards.

Non-Housing Community Development: Enhance publicly owned facilities and infrastructure, such as parks, streets, sidewalks, streetscapes and other public infrastructure and facilities. Increase access to jobs, education, health and wellness, recreation, and

health and social service activities. Enhance economic stability and prosperity by increasing economic opportunities for residents through job readiness and skill training, promotion of entrepreneurship, and other strategies.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Goals 1, 2, and 3 all provide affordable housing and per 91.315(b)(2), the state must specify the number of extremely low-income, low-income, moderate-income families and homeless persons to whom affordable housing will be provided. The figures in the table above are estimate based on prior program performance with relation to the income levels served by household and the projected outcomes by Goal.

The state estimates that it will provide affordable housing to 20,000 extremely low-income households, 4,000 low-income households and 1,000 moderate income households over the next five years.

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable for the State of Rhode Island.

Activities to Increase Resident Involvements

Public Housing Authorities (PHAs) throughout Rhode Island operate Family Self Sufficiency (FSS) programs to its Housing Choice Voucher recipients and/or public housing residents. The state's Housing Finance Agency, RIHousing, who administers housing choice vouchers for municipalities without a housing authority, also offers FSS programming to its voucher holders. Participating families execute a 5-year FSS Contract of Participation that specifies the rights and responsibilities of both parties and the goals and services for the family. The family works with an FSS coordinator to be connected to services to assist with completing their goals.

Some of the services coordinated through the FSS program include childcare, transportation, education, job training, employment counseling, financial literacy, and homeownership counseling, among others.

An interest-bearing escrow account is established by the PHA for each participating family. Any increases in the family's rent as a result of increased earned income during the family's participation in the program result in a credit to the family's escrow account. Once a family successfully graduates from the program, they may access the escrow and use it for any purpose.

In its role as a PHA, RIHousing engages with a Resident Advisory Board (RAB), which is composed of seven residents that utilize RIHousing's vouchers. The RAB is notified of any changes to PHA publications, such as administrative plans, manuals and five-year/annual plans. The RAB is encouraged to submit comments to RIHousing with regards to the proposed changes in these documents. The chairperson of the Resident Advisory Board is also invited to attend meetings of the PHA Board of Commissioners.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

N/A

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

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

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

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

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The state is committed through its relationships with municipalities and other stakeholders to remove or ameliorate the negative effects of policies that impede the development of affordable homes in order to reduce costs to develop housing in general and affordable housing where applicable. In coordination with the updated 2025 Analysis of Impediments to Fair Housing Choice, the state has identified many strategies to be carried out by both RIHousing and the Executive Office of Housing.

SP-60 Homelessness Strategy – 91.315(d)

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

The CHF has a strong outreach network. CHF funding provides resources for projects to engage those in shelter and those on the street. Crossroads Rhode Island and the Rhode Island Coalition to end Homelessness run the operations of the Coordinated Entry System, which is a federal mandate that requires the state's homeless service providers to integrate their efforts to achieve the following goals:

- Make it easier for people to access services
- Identify and prioritize services based on need
- Make sure that people who need help the most get help first

As part of this effort, Crossroads Rhode Island operates Housing Problem Solving, which includes Prevention and Diversion programs. They provide a range of outreach services to homeless adults as part of their crisis intervention programming. The Coalition to End Homelessness operates the Coordinated Entry hotline, prioritization of resources, and makes referrals into CHF and COC funded programs.

Stakeholders have identified the need for increased case management services with the ability to increase or decrease services depending on individual needs.

Addressing the emergency and transitional housing needs of homeless persons

As part of the state's Housing First policy, it is the goal of CHF and CoC programs to help people move out of emergency shelter and into stable housing as quickly as possible.

Diversion and assessment specialists meet with individuals and families to better understand their specific circumstances and housing or service needs. CHF and COC use evidence-informed assessment tools to prioritize clients on factors such as their history of homelessness, physical or mental illness and ability to live independently.

In addition to the COC, the Rhode Island Executive Office of Housing administers the Consolidated Homeless Fund (CHF), which provides grant funds to units of general local government and non-profit organizations that provide services to the homeless. Units of general local government and non-profit organizations are encouraged to apply for funding for one or more of the following eligible activities:

- Housing Problem Solving,
- Street Outreach,
- Regional Access Points,
- Emergency Shelter,
- Rapid Rehousing,
- Supportive Services, and
- Systems projects.

More than 4,000 persons annually find themselves in a homeless shelter or a place not meant for human habitation. Although the CHF program does not provide direct support to individuals and families who are homeless, this population is almost exclusively served by programs supported by the Consolidated Homeless Fund.

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.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving

assistance from public and 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.

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

According to data from Rhode Island in 2023, of those tested, 2.4% of children aged 6 and younger tested above 5 mcg/dL (the previous limit for lead concentrations to be considered “elevated”, the CDC changed the limit to 3.5 mcg/dL in 2021). This number has been steadily decreasing from 9.8% in 2010. Similarly, the percentage of new cases of those tested was 1.5% in 2023, down from 7.4% in 2010. Persistent testing and mitigation efforts in Rhode Island have been effective in decreasing these lead hazard risks for children.

Rhode Island will continue to support the much-needed work in addressing and reducing Lead-Based Paint hazards found in homes built before 1978. Rhode Island has the 3rd oldest housing stock in the nation and this stock requires proper maintenance and rehabilitation to mitigate the hazards posed by the widespread use of lead-based paint prior to 1978. Therefore, it is a state goal to improve the health, safety and energy efficiency of all Rhode Island homes.

Legislation changes that took effect in 2005 required Rhode Island landlords to obtain a Certificate of Conformance, a document obtained from an authorized lead inspector or inspector technician that certified that the rental property was not hazardous for the tenants (i.e., all painted surfaces had intact paint, impact or abrasion surfaces were treated so lead-based paint was not subject to impact or abrasion, dust samples passed laboratory analysis, and soil within 5 feet of the property was covered and had no visible paint chips). Records of these certificates and the dates they were obtained are maintained in a database by the Department of Health. To comply with the law, rental property owners might instead have their property certified as lead safe or lead-free. The lead safe and lead-free (LSLF) certificates are granted by and recorded at the Rhode Island Department of Health (RDIOH).

The Lead Hazard Mitigation Act of 2004 (Rhode Island General Laws 42-128.1) was passed to promote the prevention of childhood lead poisoning in Rhode Island. The Rhode Island Department of Health is the designated agency for lead hazard mitigation planning, education, technical assistance and coordination of state projects and state financial assistance to property owners for lead hazard mitigation. The Center for Healthy Homes and Environment coordinates statewide efforts to eliminate lead poisoning and reduce lead exposure. The Executive Office of Housing provides funding through the state to RIHousing’s Lead Safe Homes Program, and together with the Department of Health works closely with other stakeholders to address the broader healthy housing issues such as mold, asthma prevention, suitability for disabled residents, and overall environment within the homes.

The Lead Hazard Mitigation Act requires that most owners of rental properties built before 1978, or your designee, meet the following requirements:

- Attend a Lead Hazard Awareness Class
- Conduct a visual assessment of your rental property
- Fix lead hazards on your rental property
- Have an Independent Clearance Inspection in order to obtain a Certificate of Conformance for your rental unit(s)
- Give tenants information about lead hazards and a copy of the Inspection Report
- Respond to tenant concerns, perform regular maintenance on your rental unit(s), and keep your Certificate of Conformance current

RIHousing will continue to work with the RIEOH and the Housing Resources Commission to ensure that the state's lead laws are being implemented effectively.

Renovations that disturb lead paint can poison family members, visitors, and neighbors. To keep properties safe from lead hazards, Rhode Island's Renovation, Repair, and Painting (RRP) Rule requires contractors, painters, and other workers doing renovation, repair, or painting on pre-1978 homes or child care facilities (including daycares, preschools, and elementary schools) to work for licensed Lead Hazard Control Firms. Rhode Island's RRP Rule applies to contractors, landlords, property managers, homeowners, and anyone else who disturbs painted surfaces on pre-1978 homes or childcare facilities. This includes general contractors as well as special trade contractors, such as painters, plumbers, carpenters, and electricians.

Since 1992, the Childhood Lead Action Project ('CLAP') has worked to eliminate childhood lead poisoning through education, parent support and advocacy. The Project is the only organization in Rhode Island devoted exclusively to this critical issue.

How are the actions listed above integrated into housing policies and procedures?

The [RIHousing 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, RIHousing and the state work together on a multi-pronged approach to reducing lead poisoning:

RI Department of Health administers the Lead Poisoning Prevention Program, which provides blood lead level testing and data analysis. The program also provides ongoing education and

guidance for health professionals, oversees lead remediation contractor and lead inspector licensing, and enforces lead poisoning prevention laws and regulations.

The RIEOH requires that all children be screened with a blood test for lead poisoning at least twice by the time they are aged 36 months, with additional screening recommendations through age 6 years, depending on risk status. Almost three quarters of Rhode Island preschool children are screened at least once by 18 months of age. All blood lead test results are maintained by the RIEOH in the Lead Elimination Surveillance System (LESS).

RIHousing will work with partner agencies, and municipalities to secure additional resources for lead mitigation and continue to improve coordination of resources to meet the broader healthy housing needs of Rhode Island residents.

The state will continue the statewide expansion of the Green & Healthy Homes Initiative Rhode Island model of coordinating resources to improve client service delivery and health outcomes while simultaneously reducing client deferral rates, energy costs and maintenance costs for low-income families. The state will look to expand this process into additional cities and towns in Rhode Island.

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.

Rhode Island requires healthcare providers to report the results of all blood lead level tests for children younger than six years old who live in Rhode Island. Lead screening data collected since the early 1990s is maintained in the Lead Elimination Surveillance System and is used for measuring lead screening rates and the incidence and prevalence of lead poisoning, as well as for program evaluation and quality assurance. Environmental inspections and compliance and enforcement activities are also tracked electronically.

Owners of units identified with lead violations are sent Notices of Violation to remove lead hazards and provided with technical assistance to conduct this properly. If lead hazards are not removed, enforcement efforts are put in place in coordination with the Attorney General's Office and local courts. As part of RIHousing's lead grant, building officials in Central Falls and Pawtucket are identifying properties without lead conformance certificates, as well as identifying lead hazards when responding to code violations. RIHousing is partnering with both

municipalities to make property owners aware of the LeadSafe Homes Program in an effort aimed at bringing property owners into conformance with the law.

These policies and procedures emphasize the need to understand the dangers of unhealthy housing and lead poisoning. The programs and initiatives: LHSP, LESS, LSLF, RSS, CLAP and EnergyWise described in this section contribute to achieving the ends associated with health housing policies.

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The State of Rhode Island, through its social service agencies, funds or sponsors many anti-poverty programs for poverty-level families.

Anti-Poverty Programs

- 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.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

All four goals described in the Strategic Plan (SP-45) have either explicit or implicit aspects that reduce the number of poverty-level families in the state.

Rhode Island Executive Office of Housing 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 Crossroads RI, carpentry training and a culinary arts program at Amos House, recovery coach and clinician training at the Providence Center, retail training at Foster Forward, and retail training at House of Hope. Many of these job training initiatives were funded by the Governor's Workforce Board – Workforce Innovation Grants program. Projects also assist their participants in accessing training and job openings through a partnership with the RI Department of Labor and Training.

RIHousing will continue to administer a Family Self Sufficiency (FSS) program, which enables individuals and families who receive assistance through the Housing Choice Voucher Program (HCVP) to learn the fundamentals of money management and achieve economic independence.

SP-80 Monitoring – 91.330

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

HOME

Upon approval of a development funding application, the applicant shall enter, execute, deliver and provide RIHousing with such documents, instruments, and further assurances, as RIHousing deems necessary to assure compliance with the HUD regulations. The Agreement shall remain in effect for the period of affordability. At a minimum, the Agreement shall contain provisions concerning all items in accordance with the requirements of HUD regulations together with such other requirements as RIHousing may require. The Agreement will include the method of enforcement by RIHousing. The Agreement will specify remedies for breach of the provisions of the Agreement.

To ensure compliance with the requirements of HUD and Corporation Regulations, RIHousing will conduct on-site inspections and financial oversight in accordance with 92.504. The Asset Management Department will conduct annual file reviews and on-site property inspections. The assigned sends each HOME unit sponsor a request letter for copies of files for the file review and to arrange an appointment to conduct the inspection. If the unit fails on-site inspection, then a discussion with the owner takes place to address repairs noted that would be necessary to bring the unit up to the standard, and these deficiencies and corrections are included in each year's CAPER. The on-site property inspections measure compliance with state and local building codes, disaster mitigation, health and safety, lead-based paint, and all other standards listed under 24 CFR 982.401.

Minority Business Enterprise / Women's Business Enterprise (MBE/WBE): RIHousing will continue its present efforts to utilize minority and women's business enterprise (MBE/WBE).. All contracts for the procurement of property and services awarded under the HOME Program shall to the maximum extent possible be awarded to businesses owned by minorities and women.

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 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.

ESG

Program Monitoring Overview

The Executive Office of Housing uses monitoring to help ESG subrecipients who receive funding through the Consolidated Homeless Fund Partnership to identify problems or potential problems, and to help subrecipients correct them. The objectives of CHFP monitoring are to determine if ESG subrecipients are:

- Carrying out activities as described in their contracts (as modified or amended).
- Carrying out the program in a timely manner, in accordance with the CHFP contract.
- Charging only eligible costs to the program or project.
- Complying 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.
- Have a continuing capacity to carry out the approved program.

Risk-Based Analysis

ESG Subrecipients are monitored by the Executive Office of Housing are identified through a risk-based analysis (completed in the fall) of the following factors:

1. Size of Program Complexity (5 points)
2. New Staff/Programs (2 points)
3. Identified Issues (3 points)
 - Discrepancies in financial management
 - Program does not meet quarterly progress reporting deadlines
 - HMIS data not being collected regularly and accurately
 - Slow and inaccurate drawdowns
 - Program has not submitted timely audits
 - Program has not met expenditure deadlines
 - Physical Concerns (shelter habitability and safety concerns)
 - Other issues identified through desk audit

Management of Monitoring Activities

Rhode Island Executive Office of Housing staff monitors subrecipients' 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 available data in making judgments about grantee performance and is conducted by the Executive Office of Housing 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, the Executive Office of Housing or the respective entitlement community, may conduct an on-site monitoring visit. On-site monitoring 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

Subrecipients 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:

- Date and time of the visit
- Names and titles of the staff conducting the monitoring
- Elements of the program to be monitored
- Files and records to be reviewed

The Executive Office of Housing staff completes the following steps when conducting on-site monitoring:

- Conduct an entrance conference with the Executive Director, Director of Programs, or other subrecipient official to explain the purpose and schedule for the review
- Interview members of the subrecipient staff to gather information about subrecipients activities and performance
- Review additional materials provided by the subrecipient 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 subrecipient staff to discuss the preliminary conclusion of the review and identify any follow-up actions the subrecipient will need to take.

3. Monitoring Results - Within 60 days after completion of monitoring, CHFP will send written correspondence to the subrecipient 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:

- The program monitored
- The dates of the monitoring
- The 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)
- If applicable, 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
- If applicable, clearly labeled findings and concerns

- If there are findings, an opportunity for the program participant to demonstrate, within a time prescribed by HUD, that the participant has, in fact, complied with the requirements;
- Response time frames, if needed;
- An offer of technical assistance, if needed, or a description of technical assistance provided during the monitoring.

Continuum of Care

COC recipients are monitored at least once a year. Prior to monitoring reviewer(s) determine what type and combination of monitoring will be conducted at which point reviewer(s) communicate this to the recipient. Reviewer(s) send grantee's the monitoring packet to be completed and submitted prior to the monitoring visit. In addition, send a list of items that will be reviewed as well as what needs to be made available to take back to the office.

Monitoring may cover some or all the four major areas:

1. Quality of Housing and Services
2. Financial Statements
3. Recordkeeping and Files
4. Adherence to Program Policies and Procedures

On-site monitoring consists of the selection and review of a statistically relevant number of randomly selected files. Prior to monitoring we request recipients all program files for random selection. If those files are inconsistent, missing forms, lacking appropriate documentation for client eligibility or rent calculations, etc. proceed to review an additional statistically relevant number of randomly selected files; and so on and so forth.

In addition to the questions asked in the packet during monitoring reviewer(s) also inquire about:

- Any conflicts of interest
- HMIS data collection statement is posted at the intake desk
- Code of Conduct (updated if applicable)
- Due Process for participant termination
- View items paid for through the CoC grant such as improvements, van purchased, furniture purchased

After the monitoring review, recipients receive a written response to the results of the monitoring. If there were no issues identified during the monitoring letters should go out within

90 days after the visit. However, if minor issues are identified and shared with the subrecipient during monitoring allow sponsors to remedy the issue prior to a written response. Identified issues are divided into findings (issues which affect program regulations or federal laws) concerns (issues that denote an area of weakness which if not addressed could lead to a finding) and recommendations (issues which do not). Those programs receiving findings or concerns receive a follow-up letter with the list of finding or concerns and their respective corrective actions. Each finding should reference the federal regulation that was not met. The letter may also specify a timeframe for follow-up with another monitoring visit, to ensure that corrective action has been taken.

Expected Resources

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

Introduction

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

Other sources that will be leveraged by the State of Rhode Island for the 2025 Program Year to achieve the stated goals are described below:

Goal 1: Develop and Preserve Affordable Housing: All units developed and preserved by Rhode Island in PY2025 will be funded by a mix of HOME, HTF, CDBG, tax credits, and other state and federal sources, including competitively awarded funds, bonds, and loan programs. The number of units listed in the chart in AP-20 includes any units to be funded in part by CPD programs.

Goal 2: End Homelessness: The Consolidated Homeless Fund brings together various resources available to support homelessness programs into a single, coordinated effort. This included the State's ESG funds as well as those from Rhode Island's Entitlement cities and Title XX Social Service Block Grants. This goal is also supported by Continuum of Care funds, the Thresholds Program, Section 811 Project-Based Rental Assistance, the RI Neighborhood Opportunities Program, the RoadHome Service Enriched Rental Assistance Program, and the Recovery Housing Program.

Goal 3: Healthy Homes: In addition to CDBG Funds, this goal will be achieved through HUD Lead Hazard Reduction Program grant funds and HUD Healthy Home funds.

Goal 4: Non-Housing Community Development: The balance of the CDBG funds will be allocated toward this goal.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$5,755,637	\$0	\$0	\$5,755,637	\$23,022,548	Funds for housing and non-housing community development needs.
HOME	Public-federal	Acquisition Homeowner rehab Multifamily rental new construction	\$3,557,637.50	\$0	\$1,000,000	\$557,637.50	\$14,230,550	Funding for development of affordable housing.
RHP	Public-federal	End homelessness Housing	\$1,218,265	\$0	\$0	\$1,218,265	\$4,873,060	Funding for transitional housing for individuals in recovery from a substance-use disorder.
ESG	Public-federal	End Homelessness Housing	\$743,402	\$0	\$0	\$743,402	\$2,973,608	Funds for addressing the needs of people experiencing or at-risk-of homelessness.
HTF	Public-federal	Acquisition Homeowner rehab Multifamily rental new construction	\$3,001,259.36	\$0	\$0	\$3,001,259.36	\$12,005,037.44	Funding for development or preservation of affordable housing.

Table 51 - Expected Resources – Priority Table

Program Year 2025 (Year One of 2025-2029 Planning Period) Summary of Funding by Goal	
Goal 1 - Develop and Preserve Affordable Housing	PY25
HOME Investment Partnership Program	\$3,557,637.50
Community Development Block Grant	\$2,467,336.00
Housing Trust Fund	\$3,001,259.36
TOTAL	\$9,026,232.86
Goal 2 - End Homelessness	
	PY25
CHF - Emergency Solutions Grants Program - Statewide	\$743,402.00
HOME-ARP	\$2,000,000.00
Recovery Housing Program	\$1,218,265.00
TOTAL	\$3,961,667.00
Goal 3 - Healthy Homes	
	PY25
CDBG Home Repair Program	\$1,370,742.00
TOTAL	\$1,370,742.00
Goal 4 - Non-Housing Community Development	
	PY25
CDBG - Public facilities improvement	\$1,644,890.00
TOTAL	\$1,644,890.00
Goal 5 - Planning and Admin	
	PY25
CDBG - Admin	\$272,669.00
TOTAL	\$272,669.00
GRAND TOTAL	\$16,276,200.86

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

State HOME Program: Historically, the state’s HOME program for non-entitlement communities, which has received nearly \$100 million since 1992 to develop affordable rental and homeownership opportunities in the state, has leveraged \$6.39 for every \$1 of HOME funds spent on rental activities.

HOME applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. No federal funds are counted as match, only state and

private funds are considered. Sources contributing to the development of HOME-assisted projects include market rate bank financing, private foundation grants, private donations, State of Rhode Island Building Homes RI, lead hazard reduction funds (state), Thresholds Program funds and. In the upcoming planning period, the state anticipates continuing its 10 to 1 leveraging ratio due to the sustained high levels of total development costs and the limited other federal capital subsidies for affordable housing development, which will also continue to far exceed match requirements.

State CDBG Program: After the first \$100,000, administrative expenses must be matched dollar for dollar. The match for CDBG is provided by State support of staff and expenses necessary for the administration of the CDBG program. Currently, the salary and fringe for the State's CDBG Recipient Review Specialist is wholly supported with State funds – meeting most of the matching requirement.

State ESG Program: After the first \$100,000, all expenses must be matched dollar for dollar. The State meets matching requirements for the ESG program by support of homeless shelter and service programs with non-McKinney sources resources. The State has created a Consolidated Homeless Fund, which combines federal, state and local resources available for homeless shelter/services into a single program. Approximately one-third of this program is ESG with the remaining two-thirds supported by the Executive Office of Housing and Department of Human Services, Title XX homeless programs.

HTF Program: As with the HOME program, Housing Trust Fund applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. No federal funds are counted as match, only state and private funds are considered. Sources contributing to the development of HTF-assisted projects are identical in origin to those which may serve as match under the HOME program.

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

Not Applicable

Discussion

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

Goals Summary Information

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

The State of Rhode Island's 2025-2029 Consolidated Plan outlines the main objectives, priorities, and strategies for the delivery of funds to address housing and community development needs for low- and moderate-income households. In this coming program year of the 2020-2024 plan, Rhode Island will continue to evaluate and address the overarching priorities identified in the Consolidated Plan. These include:

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

The table in SP-45 of the Strategic Plan introduces the four goals of the 2025-2029 Consolidated Plan. Tables 89 A and 89 B summarize the funds available by goal and the proposed outcomes as related in the aforementioned tables from the Strategic Plan. TABLE 89 A covers the programs directly administered by Rhode Island Dept. of Housing, and TABLE 89 B covers the programs administered by RIHousing. Program Year 2025 funding for Goals 1 through 4 include an estimated \$35 million in funding from all CPD sources; HOME, CDBG, ESG, and HTF.

Other funds to support Rhode Island's housing and homelessness goals in Program Year 2025 are detailed in the introduction of the AP-15 section of the Annual Action Plan.

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Develop and Preserve Affordable Housing	2025	2029	Affordable Housing Public Housing	Statewide	Increase Housing Opportunities for Low- and Moderate-Income Households; Preserve Existing Affordable Housing	CDBG: \$2,467,336.00 HOME: \$3,557,637.50 HTF: \$3,001,259.36	Rental Units Constructed: 111 Homeowner Units Added: 10
2	Prevent and End Homelessness	2025	2029	Homeless	Statewide	End Homelessness; Develop Permanent Supportive Housing	ESG: \$743,402 HOME-ARP: \$500,000 RHP: \$1,218,265	Persons assisted: 3,000
3	Improve Health, Safety, and Efficiency of all Homes	2025	2029	Affordable Housing Homeless Non-Homeless Special Needs	Statewide	Preserve Existing Affordable Housing; Eliminate Lead Hazards	CDBG: \$1,370,742.00	Homeowner Housing Rehabbed: 75
4	Non-Housing Community Development	2025	2029	Non-Housing Community Development	Statewide	Make Infrastructure Improvements; Make Investments in Public Services and Facilities	CDBG: \$1,644,890.00	Facility Improvement Beneficiaries: 15,000
5	Planning and Administration	2025	2029	Planning and Administration	Statewide	Planning and Administration	CDBG: \$272,669.00	Planning and Administration

Table 52 – Goals Summary

Program Year 2025 (Year One of 2025-2029 Planning Period) Summary of Outcomes by Goal		
Goal 1 - Develop and Preserve Affordable Housing	Outcome	PY25
HOME Investment Partnership Program	Rental Units Constructed or Rehabilitated	30
Community Development Block Grant	Homeowner Housing Added	10
Housing Trust Fund - HERA 2008	Rental Units Constructed or Rehabilitated	20
Goal 2 - End Homelessness		
Outcome	Outcome	PY25
CHF - Emergency Solutions Grants Program - Statewide	Shelter - Persons	3,000
Goal 3 - Healthy Homes		
Outcome	Outcome	PY25
CDBG Home Repair Program	HO Housing Rehabilitated	75
Goal 4 - Non-Housing Community Development		
Outcome	Outcome	PY25
CDBG - Balance of funds	Public Facility/Improvement - Persons	15,000
Goal 5 - Planning & Administration		
Outcome	Outcome	PY25
CDBG - Planning & Admin	Plans Administered	1

Goal Descriptions

1	Goal Name	Develop and Preserve Affordable Housing
	Goal Description	Create affordable housing through new construction and rehabilitation for homeowners and renters, including permanent supportive housing.

2	Goal Name	Prevent and End Homelessness
	Goal Description	Increase opportunities for housing stability through tenant-based rental assistance, rapid rehousing, overnight shelter services, and other support. Assist homeless individuals and families to stabilize permanent housing after experiencing a housing crisis by providing client-appropriate housing and supportive service solutions. Provide homeless households with rapid rehousing rental assistance to move them as quickly as possible into permanent housing.
3	Goal Name	Improve Health, Safety, and Efficiency of all Homes
	Goal Description	Rehabilitate and preserve owner- and renter-occupied housing to bring units to code standard to provide safety improvements, energy efficiency improvements, access modifications, or treatment of lead or other home hazards.
4	Goal Name	Non-Housing Community Development
	Goal Description	Enhance publicly owned facilities and infrastructure, such as parks, streets, sidewalks, streetscapes and other public infrastructure and facilities. Increase access to jobs, education, health and wellness, recreation, and health and social service activities. Enhance economic stability and prosperity by increasing economic opportunities for residents through job readiness and skill training, promotion of entrepreneurship, and other strategies.
5	Goal Name	Planning and Administration
	Goal Description	Rhode Island will provide effective and efficient program management and oversight.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

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

Funding Allocation Priorities

Program	Goal 1 - Affordable Housing Development	Goal 2 - Homelessness	Goal 3 - Safe and Healthy Housing	Goal 4 - Non-Housing Community Development	Goal 5 – Planning and Admin	Total (%)
CDBG	43%	0%	25%	28%	5%	100%
HOME	100%	0%	0%	0%	0%	100%
ESG	0%	100%	0%	0%	0%	100%
HTF	100%	0%	0%	0%	0%	100%
RHP	0%	100%	0%	0%	0%	100%

Table 53 – Funding Allocation Priorities

Reason for Allocation Priorities

Rhode Island’s need for affordable housing development, and the lack of other sources for capital assistance, has led to the HOME and HTF programs’ focus on Goal 1. The state CDBG program funds a wide set of priorities of any state program; bolstering efforts to develop affordable housing while previously reliable capital sources have dried up, funding the Home Repair program to provide resources to low-income households throughout the state that do not qualify for other funding, and funding crucial public facility, public service and public infrastructure needs to non-entitlement communities. The State’s allocation of Recovery Housing supplemental funds allocated is limited to addressing the housing needs of persons in recovery from substance abuse disorders. The funding of programs to prevent and end homelessness through ESG relates to the state’s Strategic Plan to End Homelessness.

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

All of the funds associated with Goal 1, will combine to meet the objectives of developing or

preserving over 4,000 affordable homes over five years. In addition to the included CPD funding in this plan, the State will use various other State and Federal funding sources to complete this goal, such as tax credits and funding from Building Homes Rhode Island. All Goal 1 funds will directly address priority needs 1, 2 and 9 as described in the priority needs table in section SP-25 of the Consolidated Plan 2025-2029 Strategic Plan.

The Consolidated Homeless Fund combines five different program sources associated with Goal 2, to fund rapid re-housing, state rental assistance, permanent supportive housing vouchers and emergency shelter operations, street outreach and RI Homelessness Systems Development Work. State Rental Assistance funds the permanent supportive housing program. TBRA is funded by a combination of Section 811, RoadHome, Neighborhood Opportunities Program, and Thresholds. All of these programs combine to prevent and end homelessness, which is Goal 2 of the 2025-2029 Consolidated Plan.

The CDBG Home Repair Program provides funding to units of general local government (UGLGs), sometimes individual municipalities or groups of municipalities, to operate funding programs to homeowners in need of rehabilitation assistance. Priority needs 1, 2, 4, 5 and 9 are directly addressed by the distribution of funds to the Leadsafe Homes Program (LSHP) and municipal home repair programs (CDBG). CDBG funds for non-housing community development are distributed to UGLGs to use to develop much-needed public facilities and infrastructure. Recovery Housing Program funds will be distributed in accordance with guidance provided by HUD.

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

Introduction:

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

Distribution Methods

Low Income Housing Tax Credits

Selection criteria and relative importance:

Many of the allocation priorities defined in the state's Qualified Allocation Plan ("QAP") for its Low- Income Housing Tax Credit program are based on federal criteria as well as state criteria. Federal tax code requires that preference for an allocation of credits must be given to developments serving the lowest income residents, developments which commit to the longest period of affordability and developments located in a qualified census tract (QCT). Eligibility requirements for any type of tax credit are based on complex federal regulations, and the state advises all developers to consult qualified tax attorneys or accountants to determine eligibility for the credit.

RIHousing may hold up to three competitive funding rounds each year for the 9% allocated credits but typically only holds one round per year. Applications for tax exempt financing with 4% credits are received on a rolling basis. While 4% credit proposals are not required to participate in a competitive funding process, all development proposals must meet the requirements of the QAP.

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

encouraging energy efficiency, and otherwise expecting to have a strong community impact.

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

Resource allocation by funding category

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

Threshold factors and grant size limits

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

HOME Program

The state's HOME program awards funding for the purpose of acquisition, rehabilitation and new construction of affordable housing. RIHousing intends to continue with 10%, or \$352,518 as the cap on administration.

Selection criteria and relative importance:

Rhode Island priorities include three Tiers found below.

- 1) Tier 1 / High Priorities:
 - a) Substantial rehabilitation and/or new construction to provide new rental units for low and very low-income families;

- b) Substantial rehabilitation and/or new construction of new housing units for homeless and special needs populations (as defined in the Consolidated Plan), in conjunction with supportive services.

2) Tier 2 / Medium Priorities:

- a) New construction to provide new rental units for low and very-low income one and two-person households;
- b) Preservation of the existing affordable housing stock through rehabilitation. (Properties eligible for assistance under 24 CFR 248 "Prepayment of Low-Income Housing Mortgages" are ineligible for HOME funds)

3) Tier 3 / Low Priorities

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

Resource allocation by funding category

Funding will be allocated in a competitive application process open to all eligible entities, including cities and towns, nonprofit housing organizations, and for-profit developers. It is available to all communities in the State, with the general exception of Providence, Pawtucket, and Woonsocket, which receive HOME allocations directly from HUD. Rhode Island Housing staff review project applications to ensure their compliance with all federal and state regulations and to assess overall project feasibility. Applications are scored based upon the criteria shown later in this section. Rhode Island Housing staff reviews each proposal and recommends funding of specific activities to the Board of Commissioners. Contracts are then awarded by Rhode Island Housing to HOME sponsors. Since funds are awarded on the basis of competitive applications, it is not yet possible to identify which specific groups will be assisted during the upcoming 2025 program year.

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

Funding Categories:

- HOME-assisted rental units must have rents that do not exceed the applicable HOME rent limits. Each year, HUD publishes the applicable HOME rent limits by area, adjusted for

bedroom size. For projects with five or more HOME-assisted rental units, 20 percent (20%) of the units must be rented to very low-income families.

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

Threshold factors and grant size limits

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

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

Pursuant to 24 CFR 92.250, all HOME grantees must establish maximum limitations on the total amount of HOME funds that the grantee may invest per-unit for development of non-luxury housing. The limits must be “reasonable” and based on actual costs of developing non-luxury housing in any given geographical area. Each grantee must submit maximum per-unit development subsidy amounts and accompanying justification with its HOME Allocation Plan on an annual basis.

Maximum HOME investment: Due to the discontinuation of the Section 221(d)(3) mortgage insurance program, alternate maximum per-unit subsidy limits must be used for the HOME

Program. HUD is required to undertake rulemaking. Until a new rule can be published, HUD published a Notice (CPD-15- 003) establishing an interim policy directing participation jurisdictions (“PJs”) to use the Section 234 Condominium Housing basic mortgage limits, for elevator-type projects, as an alternative to the Section 221(d)(3) limits. This interim policy remains in effect until the effective date of the new final rule provisions, amending the existing provisions of 24 CFR 92.250(a).

To ensure consistency with the provisions of section 212(e)(1) of NAHA and 24 CFR 92.250(a), the HOME maximum per-unit subsidy limit that HUD can approve for a PJ cannot exceed 240 percent of the Section 234 basic mortgage limit (i.e., 100 percent of the basic mortgage limit plus up to 140 percent in high-cost areas). For a PJ whose high-cost percentage has been increased above the 240 percent, the CPD Division must cap the HOME per-unit subsidy limit at 240 percent of the Section 234 basic mortgage limit.

Housing Trust Fund Program

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

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

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

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

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

Rhode Island Program Priorities

Rhode Island priorities include three tiers found below:

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

Geographic Diversity

As described in the scoring factor matrix for the HTF, HTF funding is available to all communities in the state. However, priority will be given to communities who have yet to meet or exceed the

state's Low- and Moderate-Income Housing Act requirements. Geographically based distribution criteria for HTF funds also include factors that contribute to improving or sustaining economic opportunity for the future tenants or owners of the homes developed. These criteria include additional points for proximity to transit, employment centers, high performing schools and community services.

Applicant Capacity

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

Project-based Rental Assistance

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

Duration of Affordability Period

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

Priority Housing Needs in the State

Rhode Island's HTF program bases awards on the merits of a project's application in meeting the priority housing needs established by the State. Priority housing needs refers to both the program's development priorities and the statewide housing needs as determined in the State's most recently approved five-year Consolidated Plan. The program priorities are listed above, with descriptions provided for Tier 1, Tier 2, and Tier 3 housing development priorities. The priority needs established in the most recent ConPlan include: increased housing opportunities; preserved affordability of current affordable housing stock, rehabilitation of foreclosed homes and properties; decreased homelessness; permanent supportive housing; housing that is fitted to the needs of its residents; elimination of lead-based paint hazards in households with children under 6 years of age; investments and improvements in public infrastructure, public services and public facilities; and

removed barriers to fair and affordable housing. Further, it is a priority of the state's HTF-administering agent, RIHousing, that housing is developed where there is proven demand (as shown in a market study or a relevant waitlist) for that housing type.

Leveraging

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

Resource allocation by funding category

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

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

Threshold factors and grant size limits

Eligibility Requirements

- a) Funding will be allocated in a competitive application process open to all eligible entities, including cities and towns, nonprofit housing organizations, and for-profit developers. It is available to all communities in the State, with priority given based on specific factors listed in the Selection Criteria section below. Cities and towns are encouraged to apply to receive funding for projects. To be considered eligible for program funds, Rhode Island requires that

recipients of HTF funds per §93.2, at minimum: Make acceptable assurances to the grantee (RIHousing) that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds and ending upon the conclusion of all HTF-funded activities.

- b) Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity
- c) Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs
- d) Have demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development.

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

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

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

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

Selection Criteria

Minimum Requirement Threshold

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

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

Maximum per-unit development subsidy amounts for HTF projects

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

The Housing Trust Fund Program will use the same standards as published for the HOME Program for Program Year 2024, and outlined as follows:

Due to the discontinuation of the Section 221(d)(3) mortgage insurance program, alternate maximum per-unit subsidy limits must be used for the HOME Program. HUD is required to undertake rulemaking. Until a new rule can be published, HUD published a Notice (CPD-15-003) establishing an interim policy directing PJs to use the Section 234 Condominium Housing basic mortgage limits, for elevator-type projects, as an alternative to the Section 221(d)(3) limits. This interim policy remains in effect until the effective date of the new final rule provisions, amending the existing provisions of 24 CFR 92.250(a).

To ensure consistency with the provisions of section 212(e)(1) of NAHA and 24 CFR 92.250(a), the HOME maximum per-unit subsidy limit that HUD can approve for a HTF grantee cannot exceed 240 percent of the Section 234 basic mortgage limit (i.e., 100 percent of the basic mortgage limit plus up to 140 percent in high-cost areas).

CDBG Program

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

A minimum of thirty percent of the State's PY2024 CDBG allocation will be distributed on an annual competitive basis for the following priority activity types eligible under The Rhode Island Executive Office of Housing: Public facilities, Infrastructure and Public Services. Activities will be funded, in whole or in part, based upon State Priorities, taking into account limited funding available, geographic distribution of resources and staff/threshold comments. Future year funding may be committed contingent upon receipt and availability of funds. Priority populations and activities as detailed in the State's Non-Housing Community Development needs assessment may receive extra consideration. Communities are reminded that the CDBG application is highly competitive. The State intends to fund the most impactful activities in the communities of greatest need, however, not all applicants are guaranteed an award.

A rolling application process will be utilized to obligate funds to the following high priority activity categories: Housing Rehabilitation, Economic Development, and Affordable Housing. Applications may be submitted on the most current application forms available, in accordance with the Rhode Island Executive Office of Housing PY24 CDBG Schedule following the most current procedures. Such applications will be reviewed for eligibility. Only those applications which can demonstrate the activity meets program requirements, and can immediately proceed, with necessary funding substantially obligated, may be considered. The Rhode Island Executive Office of Housing staff may consult with other state agencies during the review. Temporary/transitional housing (including emergency shelters for the homeless and group homes which constitute "public facilities" under CDBG regulations) may apply under the "Affordable Housing" set aside or through the annual competitive process referenced above.

Any funds remaining from PY17 or earlier were de-obligated effective June 30, 2023 (excluding contracts with termination dates after June 30, 2022). Any program income returned, or any additional funds recaptured, de-obligated, reallocated or otherwise available shall be available in accordance with the PY24 distribution process. New awards may be funded with PY24 funds and/or prior source year CDBG funds, at the sole discretion of the Rhode Island Executive Office of Housing

Awards may be shifted to different source year funds, prior to processing of the initial draw request for an activity, to expedite closure of older grant years. Over the course of each year, in consideration of a project's timeline, future year funding may be tentatively committed to specific activities proposed, subject to availability. These amounts will be deducted from the total available in that year's application cycle.

Selection criteria and relative importance:

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

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

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

is in the application is inaccurate, it may also be eliminated; The committees may factor geographic distribution to assure areas are served equitably).

Access to application manuals

Application materials, including details on the application criteria and the PY23 CDBG Schedule, will be publicly available on the CDBG webpage at: <http://ohdc.ri.gov/community-development/cdbg/>.

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

Resource allocation by funding category

All applications will be reviewed by The Rhode Island Executive Office of Housing staff for compliance with Federal and State program rules and regulations, and threshold requirements. Any activity deemed not in compliance with such requirements will be eliminated from consideration. The Rhode Island Executive Office of Housing staff may consult with other state agencies during the threshold review. As described above, the State will use rolling and competitive application processes to distribute PY25 funds.

The CDBG funds are split among multiple Funding Allocation Priorities, with estimates shown below and in Table V. Goal 1 (Affordable Housing Development) – 30% of the State’s CDBG allocation - Applications must create or preserve long-term affordable units at any residential facility that provides transition or permanent housing and serves low/moderate income households. Capital improvements at homelessness shelters are eligible for assistance under this category, as transitional housing. Activities must meet the LMI Housing national objective (or LMI Limited Clientele in the instance of shelters); Goal 3 (Safe and Healthy Housing) – 25% of the State’s CDBG allocation - Housing rehabilitation: Rehabilitation of single family (one-four units) housing. Only applications meeting the Low/Moderate Income Housing national objective will be considered; and Goal 6 (Non-Housing Community Development) – 45% of the State’s CDBG allocation - Includes Economic Development, Public Facilities/Infrastructure, and Public Services.

Relative to CDBG/COVID funding only – the primary goal is anticipated to be Non-Housing Community Development. This is in recognition that essential services which fall into this category are a likely primary response to the pandemic. It is estimated that 75% of funds will fall within this category with the remaining 25% supporting housing.

The State will determine local administration awards, ranging from 5% to 15% based upon the activities funded, their size and their complexity. For example, a construction project which requires extensive environmental review and federal labor standards compliance may receive an additional 15% to support administrative costs, while a small public service proposal may receive little

administrative funds. All administrative expenses must be supported by time sheets/billing and other verifiable documentation.

Threshold factors and grant size limits

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

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

Limit: The State will reserve up to 25% (\$1,615,644.40) of its annual award for residential rehabilitation purposes. Any funds not obligated by the conclusion of the annual competitive application cycle described below will be de-obligated for these purposes and distributed at that time. Up to 20% may be used for documented housing operating and administrative costs. Individual projects may not exceed \$120,000/unit. No individual community may submit requests for more than 20% of the total housing rehab amount reserved. The State will assist municipality struggling with capacity to administer a residential rehabilitation program by soliciting a centralized entity which can be used for this purpose.

Affordable Housing Thresholds (No category limit specified - Projected 30%): National Objective & Eligibility Compliance; Financial Feasibility (Construction and/or Operating); Cost necessary & reasonable; Long-term affordability; Developer risk; Staff and Committee criteria detailed in the annual competitive process below. Limit: Ongoing - The State will fund applications on a first-come, first-served basis, up to a maximum allowed when factoring other set-asides. Therefore, it is projected that 30% (\$1,615,644.40) of the State's allocation would be available for this purpose. No individual application may receive more than \$250,000/unit.

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

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

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

Public Facilities/Public Improvements & Public Service Thresholds (Minimum of 30%): The Rhode Island Executive Office of Housing Staff Review/Fundability. All applications received will be reviewed by The Rhode Island Executive Office of Housing staff for compliance with Federal and State program rules and regulations. Any activity deemed not compliant with such requirements will be eliminated from consideration. Limit: The State will reserve 30% (\$1,615,644.40) to support public facility/improvement and public service proposals. Of that, a minimum of 10% (161,564.44) will be used to support public service proposals. Applications will be accepted annually using the competitive application cycle described above.

Consolidated Homeless Fund (State ESG Program)

To increase program performance and efficiency, while reducing administrative burden, the Emergency Solutions Grant (ESG) Entitlement Cities of Pawtucket, Providence, and Woonsocket have joined with the Rhode Island Executive Office of Housing, Housing Resources Commission, and the Department of Human Services (in accordance with a The Rhode Island Executive Office of Housing MOA) to create the Consolidated Homeless Fund Partnership (CHFP). Herein the State of Rhode Island will be referred to as the CHF Partnership. State ESG formula allocations (\$716,492) are combined with the ESG funds allocated to entitlement communities with additional state funds coming from a direct allocation to the HRC and a pass through of social service funds from the Title XX program.

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

Selection criteria and relative importance:

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

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

- Application Completeness
 - Proposal(s) submitted on time
 - All forms were complete and signed
- Applicant Eligibility
 - Vendor must be a governmental agency or non-profit organization and able to conduct business in the State of RI, and legally able to contract with the Executive Office of Housing.
 - Applicant Agrees to Comply with CHF Requirements

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

Step 2: Technical scoring. All applications that meet the threshold criteria listed above will be forwarded to the CHF/CoC Recipient Evaluation and Approval Committee.

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

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

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

For ESG, grant size limits include the total amount that may be used for services and emergency shelter (#2 & #3 above) will not exceed 60% of the CHF Partnership's fiscal year grant or the amount of PY24 grant funds committed for homeless assistance activities (hold harmless need amount), whichever is greater. Given these limits, on an annual basis, up to 60% of State ESG funds are used for shelter operations and essential services and approximately 40% is made available for rapid rehousing.

Resource allocation by funding category

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

- 1) Street Outreach - Funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people ("unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under § 576.2.) for the purposes of connecting them with emergency shelter, housing or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. The eligible costs and requirements for essential services consist of: engagement; case management; emergency health and mental health services (services that are typically paid for

with Medicaid funds are not eligible for funding); transportation and services for special populations.

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

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

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

- 3) Rapid Rehousing and State Rental Assistance and Voucher-Based Permanent Supportive Housing – Rapid Rehousing projects are designed to help those who are homeless quickly transition out of homelessness into permanent housing. The primary goal is to address the barriers and challenges that cause individuals and families to be literally homeless, while also working to stabilize project participants in housing through the provision of wrap around services after the family or individual obtains housing. RRH projects must offer participants supportive services to help them achieve long-term housing stability. Project/program participants are required to meet with a case manager at least once a month and should have access to a broad array of additional services to help them maintain housing. In addition, services may be provided for up to 6 months after the rental assistance ends.

Eligible expenses include:

- a) Financial Assistance-
 - *Security Deposits* - CHF funds may pay for a security deposit that is equal to no more than 1 months' rent.

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

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

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

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

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

In addition to programs historically funded through the CHFP, we seek proposals that decrease the number of people experiencing homelessness and the length of time people spend homeless. Innovative system-wide and systems projects need to meet one or more of the goals listed below:

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

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

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

Discussion:

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

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

Yes

Available Grant Amounts

Application Period and Grant Limitations

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

Acceptance process of applications

Rhode Island Section 108 Loan Guarantee Program

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

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

appropriate to carry-out the economic development activity; (9) Acquisition, construction, reconstruction, rehabilitation, or installation of public facilities (except for buildings for the general conduct of government), site improvements, and utilities, for an economic development purpose; (10) A debt service reserve in accordance with requirements.

Successful applicants will receive project money from HUD, but the repayment of those funds is guaranteed by State CDBG. The state pledges that future CDBG grant monies will repay the federal government should a non-entitlement recipient of a Section 108 Loan guarantee default. Because of this provision the state will develop an application that provides for stringent review with the following criteria: Clear definition of the project goals and activities; Effective and capable local management; Analysis of secondary economic and fiscal impacts; 44 Revenue projections and firm financial information on the proposed project; Total housing units developed for permanent affordable housing; Percent of low/moderate jobs created over the fifty-one percent National Objective minimum; Percent of jobs to be documented as "taken by" low/moderate income persons; Ratio of loan guarantee dollars to the number of low/moderate income persons; Percent of permanent affordable housing units developed over the fifty-one percent national objective minimum; Ratio of loan guarantee dollars to permanent affordable units developed; Leverage of non-government funding; Extent of Consolidated Plan/CHAS/local Affordable Housing Plan consistency.

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

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

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

No

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

N/A

AP-50 Geographic Distribution – 91.320(f)

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

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

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

HTF funding is available to all communities in the state. However, priority will be given to communities who have yet to meet or exceed state requirements that at least 10% of housing stock is affordable. Geographically based distribution criteria for HTF funds also include factors that contribute to improving or sustaining economic opportunity for the future tenants or owners of the homes developed. These criteria include additional points for proximity to transit, employment centers, high performing schools and to community services

Geographic Distribution

Target Area	Percentage of Funds
Statewide	100

Table 54 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The rationale for the prioritization for the development of affordable housing in those communities not currently with a sufficient stock is directly related to the legislative findings in Rhode Island 47 General Law § 45-53-2 that “it is necessary that each city and town provide opportunities for the establishment of low- and moderate-income housing”. The legal definition for a municipality containing a sufficient stock of low- and moderate-income housing can be found in § 45-53-3(4)(1). HOME and LIHTC funding for affordable housing production prioritize housing in areas found not to contain enough low- and moderate-income housing for the

purpose of helping each city and town in the state to provide affordable housing opportunities.

Regardless of the eligibility of a municipality or consortium to apply for funds, allocation amounts are contingent to two other geographic considerations. First is the need of that community and second is the project's location with relation to the Urban Services Boundary and its proximity to a growth center, which were defined in the State's Land Use 2025 Guide Plan.

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

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

Discussion

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

Introduction:

In PY25, the state plans to serve a total of 329 households through affordable housing programs. The majority of persons served with affordable housing will be through the development of long-term affordable rental and homeownership opportunities or through the extension of affordability of units in which the household already resides.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	329
Special-Needs	0
Total	329

Table 55 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	118
Rehab of Existing Units	211
Acquisition of Existing Units	0
Total	329

Table 56 - One Year Goals for Affordable Housing by Support Type

Discussion:

The state plans to fund the production or preservation of 329 low- to moderate-income homes with the resources it has available, including rehabilitating 211 existing structures (either producing new affordable options or preserving existing housing) and 118 homes constructed new (all of which will be counted as new affordable housing options). Though it is not a specific outcome stated as an accomplishment for Goal 1, many of the households served through the production or rehab of units for the development of affordable housing will contain special-needs populations.

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

Introduction:

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

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

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

Work with other Public Housing Authorities to more effectively meet the housing needs of all families. RIHousing operates 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 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 35 years and currently has over 139 participants actively enrolled in the program, of which 62% (85) have established savings accounts. 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, we 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.

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

Not Applicable

Discussion:

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

Introduction

The CHF has a strong outreach network. CHF funding provides resources for projects to engage those in shelter and those on the street. Crossroads Rhode Island and the Rhode Island Coalition to end Homelessness run the operations of the Coordinated Entry System, which is a federal mandate that requires the state's homeless service providers to integrate their efforts to achieve the following goals:

- Make it easier for people to access services
- Identify and prioritize services based on need
- Make sure that people who need help the most get help first

As part of this effort, Crossroads Rhode Island operates Housing Problem Solving, which includes Prevention and Diversion programs. They provide a range of outreach services to homeless adults as part of their crisis intervention programming. The Coalition to End Homelessness operates the Coordinated Entry hotline, prioritization of resources, and makes referrals into CHF and COC funded programs.

Stakeholders have identified the need for increased case management services with the ability to increase or decrease services depending on individual needs.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The RI Coalition to End Homelessness (The Coalition) oversees the RI Coordinated Entry System, which includes a call center, assessment, shelter referral and housing prioritization and referral components. As part of this effort, The Coalition operates a crisis Hotline as one option for assessment and for entry to the shelter system. Outreach workers also conduct these assessments and focus their work on reaching people who are currently living outside unsheltered. RI's homeless system provides a range of outreach services to homeless adults and families as part of its crisis intervention programming and has an outreach van out almost every night. The key to system efforts has been in establishing trust with homeless persons on the street in order for them to engage in services and access supportive housing.

The Coalition trains outreach workers on the new, streamlined assessment and call center processes to take full advantage of outreach workers skills and abilities in reaching and

assessing unsheltered persons. RI's Statewide Coordinated Entry System is a federal mandate that requires the state's homeless service providers to integrate their efforts to achieve the following goals: (1) Make it easier for people to access services; (2) Identify and prioritize services based on need; (3) Make sure that people who need help the most, get help first.

The CoC believes that the best solutions come from the people closest to the problems we are tasked with addressing. Therefore, the CoC created a standing committee in PY2023 called the Consumer Advisory Committee. The Consumer Advisory Committee consists of representatives with lived experience of homelessness or housing instability. These members are essential to the CoC's decision making and its ongoing mission of ending homelessness in Rhode Island. This group will work with the CoC Planner to provide feedback and policy recommendations to the CoC and more fully integrate those with lived experience into the formal decision-making structure.

Addressing the emergency shelter and transitional housing needs of homeless persons

It is one goal of the Coordinated Entry System to help people move out of emergency shelter and into stable housing as quickly as possible.

A key component of Coordinated Entry is a Diversion program, known as Housing Problem Solving. Housing problem solving includes homelessness prevention, diversion from homelessness and rapid resolution of homelessness. Diversion, specifically, attempts to provide support, which could include but is not limited to a conversation, resources referral and/or finite funding resources, to resolve housing instability to attempt to keep a person or family from entering homelessness. Crossroads RI leads the Housing Problem Solving for the CES and Homeless system in Rhode Island.

In addition to the RICoC, the Rhode Island Executive Office of Housing administers the Consolidated Homeless Fund (CHF), which provides grant funds to units of general local government and non-profit organizations that provide services to people experiencing homelessness. Units of general local government and non-profit organizations are encouraged to apply for funding for one or more of the following eligible activities: (1) Street Outreach – Street Outreach programs are designed to meet the immediate needs of people experiencing homelessness in unsheltered locations by connecting them with emergency shelter, housing, or critical services, and providing them with urgent non-facility-based care. Component services generally consist of engagement, case management, emergency health and mental health services, and transportation. (2) Emergency Shelter – Funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters. Each of these are described as follows: Shelter Operations – Eligible costs

are the costs of maintenance, including (minor or routine repairs) rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter; Essential Services – CHF or leveraged funds may be used to provide essential services to individuals and families who are in an emergency shelter, as follows: Housing Navigation, Case Management, Childcare, Education Services, Employment Assistance and Job Training, Outpatient Health Services, Legal Services, Life Skills Training, Mental Health Services, Substance Abuse Treatment, Transportation and Services for Special Populations; Shelter Renovations – Eligible costs include labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a governmental entity or private nonprofit organization. (3) Rapid Rehousing/State Rental Assistance – CHF funds may be used to provide housing relocation and stabilization services and short and/or medium-term rental assistance as necessary to help an individual or family experiencing homelessness move as quickly as possible into permanent housing and maintain stability in that housing placement. (4) HMIS Lead Eligible Costs – CHF funds may be used to pay the costs of managing the information system designated by the Continuum of Care to comply with the HUD’s data collection, management, and reporting standards and used to collect sub recipient level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. (5) Coordinated Entry System Lead eligible costs – CHF funds may be used to pay the costs of operating and evaluating the Rhode Island Statewide Coordinated Entry System

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

Supportive housing is a nationally tested approach to permanently break the cycle of homelessness by providing the people experiencing homelessness, including the chronically homeless, with affordable housing in combination with individualized, wrap-around services including supports focused on obtaining and maintaining housing. At the time of this Plan, Rhode Island had 3,168 supportive housing beds. This supportive housing provided case management and a variety of supportive services (such as mainstream and non-mainstream benefit application assistance, behavioral health services, financial literacy, education attainment, job skill and life-skill training) to individuals and families who had experienced

homelessness.

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

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

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

DCYF has a policy not to discharge clients into homelessness and committed to this policy through an agreement with 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 participating in DCYF's Voluntary Extension of Care (VEC.) VEC supports young adults in DCYF care at age 18 who choose to continue services.

RIHousing partners with DCYF to deliver the Foster Youth Initiative program, which links youth aging out of services with the department with a housing choice voucher. In PY 2024, RIHousing was competitively awarded Family Unification Program (FUP) vouchers. The FUP provides housing choice voucher assistance coupled with supportive services to (1) families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child/ren, in out-of-home care; or the delay in the discharge of the child/ren to the family from out-of-home care; and (2) youth who left foster care and are homeless or are at risk of becoming homeless.

An agreement between the Dept. of Health (DOH) and the Executive Office of Housing 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. If the person is unstably housed or homeless, some hospitals may discharge into EOHHS funded respite care. Discharge planners in assisted living facilities are trained to identify mainstream housing opportunities and to pair placements with Money Follows the Person (MFP) Program long-term care services. MFP transitions eligible individuals who are in a qualified institutional setting for 90 days or more into a qualified community-based residence. The program assists participants as they transition into the community, with the appropriate supports, so that they can experience more independence and a better quality of life.

An agreement between BHDDH and the Executive Office of Housing dictates that patients of mental health institutions are not to be discharged into homelessness. BHDDH supports the CoC's Housing First model in Supportive Housing with PATH and SAMSHA grants for client-centered permanent housing. In PY2024 RI Housing, BHDDH and EOHHS partnered on an application to expand HUD's 811 project rental assistance program for people with disabilities that are engaged in BHDDH services and/or are high utilizers of Medicaid and are at risk of homelessness. If awarded, the application will create 70 additional units of subsidized housing beginning in PY2025.

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

Developing coordinated reentry strategies that include social services and life skills training, in addition to the traditional supervision of probation and parole, helps ex-inmates break the cycle of incarceration. Evidence suggests that providing services beyond post release supervision, such as substance abuse treatment, mental health services, job placement and educational services lowers the recidivism rate. RI has a comprehensive approach to address offender reentry (established through Executive Order 04-02). This approach, facilitated with technical assistance from the National Institute of Corrections, represents the combined efforts of the Department of Corrections, the state legislature, numerous other state agencies, local governments, law enforcement and countless community agencies.

Discussion

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

Introduction:

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

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The state is committed through its relationships with municipalities and other stakeholders to remove or ameliorate the negative effects of policies that impede the development of affordable homes in order to reduce costs to develop housing in general and affordable housing where applicable. In coordination with the updated 2025 Analysis of Impediments to Fair Housing Choice, the state has identified many strategies to be carried out by both RIHousing and the Executive Office of Housing.

The State has identified several impediments and Actions to alleviate them in the 2025 AI, including:

- Inadequate Supply of Affordable Housing
 - Prioritize investment in higher opportunity areas that are not currently meeting affordable housing needs and in lower opportunity areas identified as strategic growth communities in Housing 2030.
 - Identify and preserve assisted housing developments whose period of affordability expires within five years, with priority given to developments in growth and high opportunity areas
 - Address home repair and health and safety issues in older homes occupied by

- lower income households
- Expand the Housing Choice Voucher Program to growth / opportunity areas
- Expand homeownership opportunities
- Inadequate Level of Public Transportation
 - Encourage new multi-family rental production in TODs or along bus routes
 - Support expanded transit efforts
 - Support efforts toward encouraging alternative methods of transportation
- Public opposition to new affordable housing development in some municipalities
 - Create an educational campaign on affordable housing as an economic development tool / incentive
 - Explore opportunities to streamline development processes that do not overprioritize the concerns of vocal minorities
 - Address legitimate public concerns raised at the local level
 - Support vocal pro-housing organizations' efforts to advance development of new housing at the local level.
- Inadequate Funding Level
 - Support efforts to increase state investment in housing development and preservation.
- Imbalanced outcomes in mortgage lending
 - Continue to collaborate with entitlement cities on statewide fair housing education, outreach, and legislative efforts

Discussion:

AP-85 Other Actions – 91.320(j)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

Youth

Foster Forward operates the Your Way Home program, which re-houses youth between the ages of 18-24 who are aging out of foster care and face homelessness. The program uses a Housing First approach to give youth a platform from which they can pursue personal goals and improve their quality of life. The process includes a referral to the State's Coordinated Entry system, conversations between former foster youth and Foster Forward staff to determine situation and needs, research by staff to locate a safe and reputable landlord, staff oversight of signing of leases by the youth, and other points of support from staff to ensure a smooth transition from foster care to independent living.

ASPIRE is also a Foster Forward program 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.

Re-entry of discharged prisoners 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 planned to foster and maintain affordable housing

The state's Executive Office of Housing provides financial and operational support for all

housing programs, including rental assistance, rapid re-housing, community development, emergency shelter and transitional housing programs. Proceeds from the state's real estate transfer tax (RETT) partially funds these efforts.

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

The Executive Office of Housing, as the state's planning and policy, standards and programs agency on housing issues, develops regulations for affordable housing development. Per their annual report for FY2025, they have allocated resources through Building Homes Rhode Island to development of 276 affordable units, supported the operating costs of a centralized waitlist for subsidized units, granted \$400k to assist municipalities in identifying potential sites for redevelopment as affordable or mixed-income housing, and through Housing Production Fund Capital and Extremely Low-Income (ELI) funds the development of new affordable units and the preservation of existing units. The RIEOH will continue this work in PY2025 of the Consolidated Plan Cycle.

Actions planned to reduce lead-based paint hazards

Renovations that disturb lead paint can poison family members, visitors, and neighbors. To keep properties safe from lead hazards, Rhode Island's Renovation, Repair, and Painting (RRP) Rule requires contractors, painters, and other workers doing renovation, repair, or painting on pre-1978 homes or child care facilities (including daycares, preschools, and elementary schools) to work for licensed Lead Hazard Control Firms. Rhode Island's RRP Rule applies to contractors, landlords, property managers, homeowners, and anyone else who disturbs painted surfaces on pre-1978 homes or childcare facilities. This includes general contractors as well as special trade contractors, such as painters, plumbers, carpenters, and electricians.

RIHousing's LeadSafe Homes Program provides remediation of lead-paint based hazards, such as new windows and doors, interior and exterior painting, and soil remediation. As stated in the Strategic Plan of the 2024-2029 Consolidated Plan is to improve the health, safety, and energy efficiency of all Rhode Island homes. LSHP achieves this goal by remediating lead-based paint hazards and expects to complete remediation work using HUD funds in 60 households in PY24. While no set-asides exist within the regulations of the program, historical program data suggests that, in a given calendar year, 60% of funds will go to multi-family projects, either

owner-occupied or not, and 40% will go to single family homeowners.

Actions planned to reduce the number of poverty-level families

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

RIHousing will continue to administer a Family Self Sufficiency (FSS) program, which enables individuals and families who receive assistance through the Housing Choice Voucher Program (HCVP) to learn the fundamentals of money management and achieve economic independence.

Actions planned to develop institutional structure

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

HUD Section 811 Project Rental Assistance Program

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

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

The effects of this system change will be measured by:

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

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

homelessness and lowering Medicaid expenditures.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	

Other CDBG Requirements

1. The amount of urgent need activities	0
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Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. – This Annual Action Plan is part of the three-year overall benefit period of 2025, 2026, 2027.

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.320(k)(2)

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

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

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:
The Rhode Island HOME Resale Provision is added at the end of this section.
3. A description of the guidelines for resale or recapture that ensures the affordability of units

acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

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

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

HOME funds will not be used for this purpose.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

8. N/A

**Emergency Solutions Grant (ESG)
Reference 91.320(k)(3)**

1. Include written standards for providing ESG assistance (may include as attachment)
See Attachment – ESG Written Standards
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
See Attachment – ESG Written Standards
3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).
See Attachment – ESG Written Standards

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
See Attachment – ESG Written Standards
5. Describe performance standards for evaluating ESG.
See Attachment – ESG Written Standards

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply: Applications submitted by eligible recipients
2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter “N/A”. N/A
3. If distributing HTF funds by selecting applications submitted by eligible recipients,
 - a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.
For HTF eligibility requirements please see AP-30, Method of Distribution.
 - b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.
For HTF application requirements please see AP-30, Method of Distribution.
 - c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.
For HTF selection criteria please see AP-30, Method of Distribution.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

For HTF geographic priorities please see AP-30, Method of Distribution.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

For HTF funding priorities based on ability to obligate and undertake eligible activities please see AP-30, Method of Distribution.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

FOR HTF funding priorities based on availability of project-based rental assistance please see AP-30, Method of Distribution.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

For HTF funding priorities based on +30 year financial feasibility please see AP-30, Method of Distribution.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is near transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

For HTF funding priorities based on priority housing needs please see AP-30, Method of Distribution.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

For HTF funding priorities based on no-federal leveraging please see AP-30, Method of Distribution.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A". Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A". Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens. Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

To maintain maximum consistency across programs, and to provide predictability and efficiency in program administration and compliance, the State has adopted the HOME program maximum per-unit development subsidy limits for the Housing Trust Fund program. The total amount of HOME funds that a participating jurisdiction may invest on a per-unit basis in affordable housing may not exceed the per-unit dollar limits established by HUD in accordance with section 212(e) of the NAHA. The 2025 HOME Final Rule was effective April 20, 2025. Per 24 CFR 92.250(a) HUD will publish the per-unit dollar limits for the area in which the housing is located annually. HUD will publish its methodology for determining maximum per-unit dollar limits through a publication in the Federal Register with the opportunity for comment.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient

detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; suitability for disabled residents; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

Attached

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A". N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A". N/A

The grantee has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental

housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan. N/A

12. Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A." N/A

Discussion:

Appendix A: LMIH Public Housing Dataset 2024

Development	Municipality	Population	Housing Type	Building Address	Total LMIH Units	Subsidy Type	ZIP Code
Benjamin Church Manor	Bristol	Elderly	Rental	1014 Hope Street	193	Public Housing	02809
Ashton Court	Burrillville	Elderly	Rental	77 Chapel Street	76	Public Housing	02830
Aime J. Forand Manor	Central Falls	Family	Rental	30 Washington Street	148	Public Housing	02863
Forand Manor Annex	Central Falls	Family	Rental	30 Washington Street	54	Public Housing	02863
Wilfrid Manor	Central Falls	Family	Rental	466 Hunt Street	125	Public Housing	02863
John O. Haynes Manor	Coventry	Elderly/Disabled	Rental	10 Carley Drive	24	Public Housing	
Knotty Oak Village	Coventry	Elderly/Disabled	Rental	14 Manchester Circle	75	Public Housing	
North Road Terrace, Phases I & II	Coventry	Elderly/Disabled	Rental	3 Mulhearn Drive	96	Public Housing	
Arlington Manor	Cranston	Elderly	Rental	50 Birch Street	120	Public Housing	
Budlong Manor	Cranston	Elderly	Rental	100 Arthur Street	71	Public Housing	
Hall Manor	Cranston	Elderly	Rental	70 Warwick Avenue	79	Public Housing	
Jennings Manor	Cranston	Elderly	Rental	125 Harris Avenue	51	Public Housing	
Knightsville Manor	Cranston	Elderly	Rental	85 Briggs Street	186	Public Housing	
Randall Manor	Cranston	Elderly	Rental	75 Mathewson Street	80	Public Housing	
Scattered sites	Cranston	Family	Rental	Scattered sites	17	Public Housing	
One Mendon Road, Phases I and II (Cumberland Manor)	Cumberland	Elderly	Rental	1 Mendon Road	176	Public Housing	02864
Dedford Farms	East Greenwich	Family	Rental	146 First Avenue #M1,M2,M3,S1,S2,F1,F2,F3,B1,B2,B3,B4	12	Public Housing	02818

Marlborough Crossing	East Greenwich	Family	Rental	150,152,154,156,158,160,162,164 Marlborough St; 24,26,28,30 London St; 159,161, 167,169 Duke St	16	Public Housing	02818
City View Manor	East Providence	Elderly	Rental	99 Goldsmith Avenue	150	Public Housing	
Goldsmith Manor	East Providence	Elderly	Rental	115 Goldsmith Avenue	100	Public Housing	
Harbor View	East Providence	Elderly	Rental	3668 Pawtucket Avenue	131	Public Housing	
Scattered sites	East Providence	Family	Rental	Scattered sites	10	Public Housing	
Warren Avenue Apartments	East Providence	Elderly	Rental	180 Warren Avenue	20	Public Housing	
Pemberton Apartments	Jamestown	Elderly	Rental	57 Pemberton Avenue	35	Public Housing	
Aime J. Forand Housing	Johnston	Elderly	Rental	8 Forand Circle	74	Public Housing	
Claiborne Pell Manor	Johnston	Elderly	Rental	1609 Plainfield Pike	54	Public Housing	
scattered sites	Johnston	Family	Rental	31 Harding Ave., 5 Monson St., 106 Waveland St., 2 Dale Dr., 14 River Dr., 8 Cottage St. (3), 30 Osgood Ave. (3), 20 Sheridan St. (2), 2, 4 Serrel Sweet Rd. (2, 2), 31 Headley Ave., , 75 Old Pocasset Rd., 76 Manual Ave., 55 Ashby St., 20 Broden Ave.	22	Public Housing	

Lincoln Manor	Lincoln	Elderly/Disabled	Rental	10 Franklin Street	194	Public Housing	
Manville Manor	Lincoln	Elderly/Disabled	Rental	155 Church Street	52	Public Housing	
Woodland Terrace	Lincoln	Family	Rental	15 Woodland Street	6	Public Housing	
Boon Street	Narragansett	Family	Rental	129 Boon Street	2	Public Housing	
Kingstown Road	Narragansett	Family	Rental	48 Kingstown Rd A,B,C; 131 Kingstown Rd	4	Public Housing	
Perkins Avenue	Narragansett	Family	Rental	18 Perkins Avenue	1	Public Housing	
Rockland Street	Narragansett	Family	Rental	6 Rockland Street	2	Public Housing	
Chapel Manor	Newport	Elderly	Rental	Chapel Street	24	Public Housing	
Chapel Terrace	Newport	Family	Rental	19 Chapel Street	68	Public Housing	
Coddington Manor	Newport	Elderly	Rental	Coddington Street	36	Public Housing	
Deblois Street	Newport	Elderly	Rental	Deblois St	8	Public Housing	
Donovan Manor	Newport	Elderly	Rental	Chapel Street	85	Public Housing	
Earl Avenue	Newport	Elderly	Rental	28A-40D Earl Avenue	20	Public Housing	
Edgar Court	Newport	Elderly	Rental	14 Edgar Court	37	Public Housing	
Hillside Homes/Weidemann Court	Newport	Family	Homeownership	120B Hillside Ave	8	Public Housing	
Newport Heights IV Homeownership	Newport	Family	Homeownership	Sgt Weidemann St; Veterans Circle; Hillside Ave	7	Public Housing	02840
Newport Heights Phase I - III	Newport	Family	Rental	59 John Chafee Blvd	299	Public Housing/Tax Credit	02840
Newport Heights Phase IV	Newport	Family	Rental	1 York St	37	Public Housing/Tax Credit	02840
Park Holm	Newport	Family	Rental	1 Park Holm Street	262	Public Housing/LIHTC/BHRI	02840
Pond Avenue	Newport	Elderly	Rental	Pond Avenue	39	Public Housing	

Allendale Manor	North Providence	Elderly	Rental	511 Woonasquatucket Avenue	24	Public Housing	
Andover/Elliott	North Providence	Family	Rental	77 Andover Street	4	Public Housing	
Charles Street Manor	North Providence	Elderly	Rental	947 Charles Street	30	Public Housing	
Marievill Manor	North Providence	Special Needs	Rental	945 Charles Street	8	Public Housing	
Sunset Terrace	North Providence	Elderly	Rental	415 Sunset Avenue	70	Public Housing	
Wentworth Avenue	North Providence	Family	Rental	25 Wentworth Avenue	10	Public Housing	
Burns Manor	Pawtucket	Elderly	Rental	95 Park Street	92	Public Housing	
Galego Court	Pawtucket	Family	Rental	483 Leonard Jenard Drive	161	Public Housing	
John E. Fogarty Housing	Pawtucket	Elderly	Rental	214 Roosevelt Avenue	248	Public Housing	
John F. Kennedy Housing	Pawtucket	Elderly	Rental	175 Broad Street	171	Public Housing	
St. Germain Manor	Pawtucket	Elderly	Rental	401 Mineral Spring Avenue	112	Public Housing	
Quaker Manor	Portsmouth	Elderly	Rental	2368 East Main Road	40	Public Housing	
Admiral Terrace	Providence	Family	Rental	263 Chad Brown Street	153	Public Housing	
Carroll Tower	Providence	Elderly	Rental	243 Smith Street	194	Public Housing	
Chad Brown	Providence	Family	Rental	263 Chad Brown Street	198	Public Housing	
Codding Court	Providence	Family	Rental	142 Dodge Street	120	Public Housing	
Dexter Manor I	Providence	Elderly/Disabled	Rental	100 Broad Street	200	Public Housing	
Dexter Manor II	Providence	Elderly/Disabled	Rental	100 Broad Street	91	Public Housing	
Dominica Manor	Providence	Elderly	Rental	100 Atwells Avenue	204	Public Housing	
Hartford Park	Providence	Family	Rental	300 Hartford Avenue	388	Public Housing	
Hartford Park Tower	Providence	Elderly/Disabled	Rental	300 Hartford Avenue	120	Public Housing	

Kilmartin Plaza	Providence	Elderly/Disabled	Rental	160 Benedict Street	106	Public Housing	
Manton Heights	Providence	Family	Rental	31 Salmon Street	330	Public Housing	
Parenti Villa	Providence	Elderly	Rental	25 Tobey Street	194	Public Housing	
Roger Williams Homes	Providence	Family	Rental	666 Prairie Avenue	40	Public Housing	
Scattered site PHA	Providence	Family	Rental	Scattered sites	244	Public Housing	
Sunset Village	Providence	Elderly/Disabled	Rental	230 Chad Brown Street	24	Public Housing	
Greenville Manor	Smithfield	Elderly	Rental	7 Church Street	50	Public Housing	
Champagne Heights	South Kingstown	Family	Rental	364 Curtis Corner Road	40	Public Housing	
Fournier Estates	South Kingstown	Family	Rental	192 High Street	12	Public Housing	
Village Gardens	South Kingstown	Elderly	Rental	69 Uncle Sams Lane	18	Public Housing	
Hancock Street	Tiverton	Elderly	Rental	99 Hancock Street	45	Public Housing	
Kickemuit Village	Warren	Family	Rental	20 Libby Lane	153	Public Housing	
Charles Ford Terrace	Warwick	Elderly	Rental	25 Easton Avenue	35	Public Housing	
Father Olsen Terrace	Warwick	Elderly	Rental	2432 Post Road	0	Public Housing	
Meadowbrook Terrace & Annex	Warwick	Elderly	Rental	2220 Warwick Avenue	180	Public Housing	
Scattered Sites	Warwick	Family	Rental	90 Drum Rock Avenue	36	Public Housing	
Shawomet Terrace	Warwick	Elderly	Rental	1035 West Shore Road	26	Public Housing	
Warwick Terrace	Warwick	Elderly	Rental	2215 Elmwood Avenue	100	Public Housing	
Warwick Terrace Annex	Warwick	Elderly	Rental	124 Tennessee Avenue	18	Public Housing	
West Shore Terrace	Warwick	Elderly	Rental	3070 West Shore Road	124	Public Housing	

Clyde Towers	West Warwick	Elderly	Rental	1021 Main Street	124	Public Housing	
West Warwick Manor	West Warwick	Elderly	Rental	62 Roberts Street	126	Public Housing	
Arlington Street	Westerly	Family	Rental	24 Arlington Street	2	Public Housing	
Chestnut Court	Westerly	Elderly	Rental	5 Chestnut Street	50	Public Housing	
Fairview Avenue	Westerly	Family	Rental	43 Fairview Avenue	2	Public Housing	
Gardner Drive	Westerly	Family	Rental	5 Gardner Drive	1	Public Housing	
North Joseph Street	Westerly	Family	Rental	9 North Joseph Street	2	Public Housing	
Park View Apartments	Westerly	Elderly	Rental	9 Dixon Street	60	Public Housing	
State Street	Westerly	Family	Rental	6 State Street	2	Public Housing	
Summer Street	Westerly	Family	Rental	76 Summer Street	2	Public Housing	
Sunrise Drive	Westerly	Family	Rental	21 Sunrise Drive	2	Public Housing	
Crepeau Court	Woonsocket	Elderly	Rental	100 Front Street	153	Public Housing	
Jacob Lane	Woonsocket	Family	Rental	44 Jacob Lane	47	Public Housing	
John F. Kennedy Manor	Woonsocket	Elderly	Rental	547 Clinton Street	198	Public Housing	
Morin Heights	Woonsocket	Family	Rental	66 Morin Heights Blvd	282	Public Housing	
Parkview Manor	Woonsocket	Elderly	Rental	218 Pond Street	126	Public Housing	
St. Germain Manor	Woonsocket	Elderly	Rental	429 East School Street	153	Public Housing	
Veterans Memorial	Woonsocket	Elderly	Rental	2 Bourdon Blvd	14	Public Housing	
Veterans Memorial	Woonsocket	Family	Rental	2 Bourdon Blvd	282	Public Housing	

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