STATE OF RHODE ISLAND

2020 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

State of Rhode Island
City of Cranston
City of East Providence
City of Pawtucket
City of Providence
City of Warwick
City of Woonsocket

June 2020

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1. Executive Summary

The State of Rhode Island has prepared an Analysis of Impediments to Fair Housing Choice to satisfy requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME) funds affirmatively further fair housing. Additionally, HUD entitlement communities must comply directly with HUD rules and regulations designed to uphold the Housing and Community Development Act of 1974, as amended. Rhode Island has six entitlement communities: Cranston, East Providence, Pawtucket, Providence, Warwick, and Woonsocket. As a result, entitlement communities are charged with the responsibility of conducting its CDBG and HOME programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, including units of local government, which receive federal funds through the City.

Entitlement communities that receive CDBG and HOME funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice (AI). The AI is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

Entitlement communities have specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the jurisdictions' initiatives to affirmatively further fair housing.

The following observations were noted throughout the AI. These issues are based on the primary research collected and analyzed and the numerous interviews and focus group sessions conducted for this report. They help to establish context for the impediments to fair housing choice.

- 1. *Population growth in Rhode Island has been stagnant since 2000*, seeing only 0.3% growth between 2010 and 2017. The national average was 5.0%.
- 2. Rhode Island has become more diverse between 2000 and 2017 with the largest increases occurring among Asian and Hispanic persons outside of the largest urban areas; Providence is showing relatively slower rates of growth in terms of diversity.
- 3. Providence and surrounding towns such as Pawtucket and East Providence are home to a large foreign-born population, far exceeding that of the state median.

- 4. Persons with disabilities participate in the labor market at lower rates than those without disabilities (45.8% versus 83.2%) and are more likely to earn less money (\$24,523 versus \$35,546). Unemployment rates for persons with disabilities are similar to those without disabilities across the State and within the Entitlements.
- 5. Household compositions have largely remained the same between 2010 and 2017, with married couples making up the majority of households at 71.1% in 2017. While changes have been mostly stagnant, there has been a decrease in the number of married couples with children during this time period, with Rhode Island and all Entitlements experiencing decline or stagnation with the exception of Providence (5.6% increase).
- 6. A larger proportion of female-headed households with children live in poverty (37.6%) compared to 18.1% of male-headed households with children and 5.6% of married couples with children.
- 7. Between 2010 and 2017, incomes have declined or stagnated for all groups except for Asian persons (+15.2%). Differences between racial and ethnic groups varied drastically by geography.
- 8. Black and Hispanic households are more likely to be unemployed than other racial groups. When the statewide unemployment rate was 6.8%, unemployment was 10.9% and 11.2% among Blacks and Hispanics, respectively.
- 9. Homeownership rates and rental rates have remained stagnant, with homeownership rates at 60.0% in 2017.
- 10. Homeownership rates are significantly lower for Blacks and Hispanics. While 65.3% of White households were homeowners, 32.0% of Black and 27.2% of Hispanic households owned their homes.
- 11. Non-White households tend to be larger than White households and are in the rental market at higher rates. Only 19.6% of units in the rental market in 2017 had three or more bedrooms. The more urbanized areas tended to have rental units with three or more bedrooms.
- 12. Housing values dropped significantly across Rhode Island (-22.9%) while gross rent and median income decreased marginally (-3.5% and -1.1%, respectively) between 2010 and 2017. While the Entitlements mostly showed the same patterns as the State, towns in and around the Providence metro area showed large increases in median income and, in some, increases in median gross rent.
- 13. Overall, the level of segregation among non-White and White persons has decreased between 2010 and 2017 as measured by the dissimilarity index. However, increased segregation has occurred in the more urbanized areas.
- 14. There are seven census tracts in Rhode Island that have both non-White and higher poverty populations that meet HUD's definition of racially/ethnically concentrated areas of poverty (R/ECAPs). These census tracts have a poverty rate of 40% and a non-White population that consists of 50% of the population in urban areas or 20% in non-urban areas. These R/ECAPs are located primarily in the more metropolitan areas of Providence and Pawtucket.

The following is a series of Fair Housing Action Plans for RIHousing and OHCD (combined) as well as the individual plans for each of the six Entitlements.

RIHousing and OHCD				
Impediment	Actions	Measurable Benchmarks	Timeframe	
Inadequate supply of affordable housing	Prioritize investment in higher opportunity areas that are not currently meeting affordable housing needs and in lower opportunity areas where development is a part of a broader community revitalization	Increased housing development in high opportunity areas and as a part of broader neighborhood revitalization efforts.	2020-2021	
	plan. Identify and preserve assisted housing developments whose period of affordability expires within five years, with priority given to	a) Prepare plan outlining locations in growth / high opportunity areas, potential partners and funding resources two years before expiration of	a) 2020-2021	
developments in gro and high opportunity areas	and high opportunity	each development b) Prioritize preservation on developments with expiring affordability restrictions	b) 2020-2021	
	Work toward reducing zoning barriers to affordable housing production	a) Provide web-based and direct technical assistance to municipal and zoning officials to facilitate development activity and address local concerns. b) Draft model zoning language to foster affordable housing development in partnership with OHCD and APA Rhode Island c) In partnership with OHCD and APA Rhode Island, provide technical assistance to municipalities for adopting new zoning provisions that promote the production of affordable housing and eliminate barriers to	a) 2020-2021 b) 2021 and beyond	

			T T
		d) Look for opportunities	
		to increase project-	
		based vouchers and	
		development of	
		housing serving lowest	
		income and special	
		needs populations.	2000
	Address home repair and	Continue the lead	2020 and beyond
	health and safety issues in older homes occupied	abatement and accessibility	
	by lower income	CDBG housing	
	households	rehabilitation programs.	
		Provide funding for lead	
		hazard mitigation program	
		administered by the Dept.	
		of Health. Capitalize on	
		membership in Rhode Island	
		Alliance for Healthy Homes	
		to assist, where appropriate.	
	Expand the Housing	a) Continue to seek out	a) 2020 and
	Choice Voucher Program	landlords in growth /	beyond
	to growth / opportunity areas	opportunity areas to	
	areas	participate in the program	
		b) Explore establishing a	b) 2020 and
		State Landlord Risk	beyond
		Mitigation Fund for	
		landlords renting to	
		voucher holders	
		c) Amend the RI Fair	
		Housing Practices Act to	c) 2020 and
		add "source of lawful	beyond
		income" as a protected	
		class	
	Advise the Governor's	Support the Governor's	2020 and beyond
	Office on proposed	Office in evaluating	
	amendments to the "10% affordable	amendment language	
	housing requirement"		
	included in the Low and		
	Moderate Income		
	Housing Act (RIGL: 45-		
	53)		
	Expand	Continue Downpayment	2020 and beyond
	homeownership	Assistance Program	
	opportunities	7.55.554.155 7.756.4111	
Inadequate level of public	Encourage new multi-	Give priority in	2020-2021
transportation	family rental	development financing	
'	production in TODs	programs to developments	
	production in 1003	programs to developments	1

		connected to transit or close to jobs and services	
	Support expanded transit planning efforts	Continue to engage in the Transit Master Plan (Transit Forward RI 2040) and other transportation planning initiatives by RIPTA, RIDOT, and Division of Statewide Planning	2020 and beyond
Public opposition to new affordable housing development in some municipalities	Create an educational campaign on affordable housing as an economic development tool / incentive	Collaborate with Department of Commerce the business community to develop the materials	2021
	Enforce HUD's AFFH certification with sub-recipient units of government	Develop a policy for reviewing and making a determination as to whether a municipality that receives CDBG funds has complied with its obligation to affirmatively further fair housing and, if not, the subsequent consequences and opportunities to remedy.	2020 and beyond
	Provide State incentives to address concerns raised at the local level	Consider creating municipal incentives to offset local concerns about the cost of educating additional children, similar to 40S in Massachusetts	2021-2022
Inadequate funding level	Support efforts to secure a dedicated source of statewide funding for affordable housing production, either through the proposed real estate conveyance tax increase or an identified alternative	Continue to collaborate with the Executive Office of Commerce to support the Governor's 2020 proposal for a dedicated funding stream.	2020 and beyond
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing education, outreach and legislative efforts	 a) Sponsor regional fair housing trainings b) In partnership with RIHRC develop a fair housing webinar for local elected officials and appointed board and commission members 	a) 2021 and beyond b) 2021

c) Look for opportunities c) 2020 until
to increase project- achieved
based vouchers and
development in
housing serving lowest
income and special
·
needs populations
d) Encourage shared d) 2020 and
jurisdiction of housing beyond
vouchers between PHAs
to provide greater
housing opportunities for
voucher recipients and
reduce delays in leasing
up vouchers at turnover
e) Refer cases to RI Legal Services and other
resources, as
appropriate f) Update landlord/tenant
handbook and actively
share it with community
partners as well as
tenants and landlords
teriants and iditatoras

Impediment	Actions	Measurable Benchmarks	Timeframe
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	a) Continue local partnerships to:	2020 and beyond
	Work toward reducing zoning barriers to affordable and fair housing	properties Revise zoning ordinance to be consistent with Federal Fair Housing Act	2020-2021
Public opposition to new affordable housing development	Create an educational campaign on affordable housing as an economic incentive	Collaborate with OHCD and the business community to develop the materials	2021
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing education and outreach efforts	 a) Sponsor regional fair housing trainings b) Continue providing fair housing information in languages spoken by city residents c) Provide fair housing training to planning 	a) 2021 and beyond b) 2020 and beyond c) 2020 and beyond

CITY OF EAST PROV	/IDENCE		
Impediment	Actions	Measurable Benchmarks	Timeframe
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	 a) Continue to abate lead in older homes b) Continue effective code enforcement among rental properties 	a) 2020 and beyond b) 2020 and beyond
	Work toward reducing zoning barriers to affordable and fair housing	Revise zoning ordinance to be consistent with fair housing laws	2020-2021
Public opposition to new affordable housing development	Create an educational campaign on affordable housing as an economic incentive	Collaborate with RIHousing, OHCD and the business community to develop the materials	2021
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing education and outreach efforts	 a) Sponsor regional fair housing trainings b) Continue providing fair housing education to landlords c) Continue providing tenant and landlord training on wrongful evictions d) Provide fair housing training to planning commission members 	a) 2021 and beyond b) 2020 and beyond c) 2020 and beyond d) 2020 and beyond

Impediment	Actions	Measurable Benchmarks	Timeframe
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units Work toward reducing zoning barriers to affordable and fair housing	a) Continue to abate lead in older homes b) Continue effective code enforcement among rental properties Revise zoning ordinance to be consistent with fair housing laws	a) 2020 and beyond b) 2020 and beyond 2020-2021
Public opposition to new affordable housing development	Create an educational campaign on affordable housing as an economic incentive	Collaborate with OHCD and the business community to develop the materials	2021
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing education and outreach efforts	a) Sponsor regional fair housing trainings b) Continue providing fair housing education to landlords c) Continue providing tenant training on wrongful evictions d) Provide fair housing training to planning commission members e) Continue fair housing education to homebuyers with Central Falls partnership f) Continue providing language assistance to persons with LEP g) Continue to implement the city's Section 504 Transition Plan h) Continue working to diversify appointed boards and commissions i) Provide fair housing training to planning	a) 2021 and beyond b) 2020 and beyond c) 2020 and beyond d) 2020 and beyond e) 2020 and beyond f) 2020 and beyond g) 2020 and beyond h) 2020 and beyond i) 2020 and beyond i) 2020 and beyond

CITY OF PROVIDEN	CE		
Impediment	Actions	Measurable Benchmarks	Timeframe
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	a) Continue to abate lead in older homes b) Continue working with partners to prevent lead poisoning in older homes c) Continue effective code enforcement among rental	a) 2020 and beyond b) 2020 and beyond c) 2020 and beyond
		properties d) Continue Home Repair program to address health and safety issues e) Continue use of ViewPoint	d) 2020 and beyond e) 2020 and
		to ensure an efficient permitting system f) Continue new housing development initiatives, expanding to areas outside of R/ECAPs with city's	beyond f) 2020 and beyond
		Housing Trust Fund g) Continue partnership with HNRI for homebuyer program h) Complete the Comprehensive Plan with a strong focus on affordable housing and housing preservation	g) 2020 and beyond h) 2020 and beyond
	Work toward reducing zoning barriers to affordable and fair housing	Revise zoning ordinance to improve consistency with fair housing laws as outlined on page 188.	2020-2021
Inadequate level of public transportation	Enhance public transit service and facilities	a) In partnership with RIPTA, implement TIGER grant initiatives b) Continue JUMP Bike Share and e-Scooter programs as	a) 2020 through completionb) 2020 and beyond
		transit options c) Continue implementation of the city's new Great Streets Master Plan d) Continue partnerships for implementing autonomous	c) 2020 through completiond) 2020 and beyond
		Streets Master Plan d) Continue partnerships for	d) 2020 and

Discriminatory behavior	Continue to collaborate	a)	Sponsor regional fair	a)	2021 and
toward members of the	with other AI participants	,	housing trainings		beyond
protected classes	on statewide fair housing	b)	Continue providing fair	b)	2020 and
	education and outreach		housing education to		beyond
	efforts		landlords		
		c)	Continue providing tenant	c)	2020 and
			training on wrongful		beyond
			evictions		
		d)	Provide fair housing	d)	2020 and
			training to planning		beyond
			commission members		
		e)	Continue fair housing	e)	2020 and
			education to homebuyers		beyond
		f)	Continue multi-lingual	f)	2020 and
			webpages		beyond
		g)	Continue partnership with	g)	2020 and
			RWU Law Clinic and RI		beyond
			Center for Justice to		
			secure fair housing rights		
			for tenants	h)	2020 and
		h)	Implement no-cost Right-	,	beyond
			to-Counsel pilot program		,
			for tenants at risk of		
			eviction		

CITY OF WARWICK			
Impediment	Actions	Measurable Benchmarks	Timeframe
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	a) Continue to abate lead in older homes b) Continue effective code enforcement among rental properties c) Continue conversion of REO/foreclosed properties to affordable housing d) Continue providing funding for implementation of neighborhood master plans e) Continue partnerships to modify units with accessibility features for	 a) 2020 and beyond b) 2020 and beyond c) 2020 and beyond d) 2020 and beyond e) 2020 and beyond
	Work toward reducing zoning barriers to affordable and fair housing	person with disabilities Revise zoning ordinance to be consistent with fair housing laws	2020-2021
Public opposition to new affordable housing development	Create an educational campaign on affordable housing as an economic incentive	Collaborate with OHCD and the business community to develop the materials	2021
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing education and outreach efforts	 a) Sponsor regional fair housing trainings b) Continue providing fair housing education to landlords c) Provide fair housing training to planning commission members d) Continue providing language assistance to 	 a) 2021 and beyond b) 2020 and beyond c) 2020 and beyond d) 2020 and beyond
		persons with LEP e) Continue working to diversify appointed boards and commissions	e) 2020 and beyond

CITY OF WOONSO	CKET		
Impediment	Actions	Measurable Benchmarks	Timeframe
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	a) Continue to abate lead in older homes b) Continue effective code enforcement among rental properties c) Continue conversion of REO/foreclosed properties to affordable housing d) Continue providing funding for implementation of neighborhood master plans e) Continue partnerships to modify units with accessibility features for person with disabilities	a) 2020 and beyond b) 2020 and beyond c) 2020 and beyond d) 2020 and beyond e) 2020 and beyond
	Work toward reducing zoning barriers to affordable and fair housing	Revise zoning ordinance to be consistent with fair housing laws	2020-2021
Public opposition to new affordable housing development	Create an educational campaign on affordable housing as an economic incentive	Collaborate with OHCD and the business community to develop the materials	2021
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing education and outreach efforts	 a) Sponsor regional fair housing trainings b) Continue providing fair housing education to landlords c) Provide fair housing training to planning commission members d) Continue providing language assistance to persons with LEP e) Continue working to 	 a) 2021 and beyond b) 2020 and beyond c) 2020 and beyond d) 2020 and beyond e) 2020 and
		diversify appointed boards and commissions	beyond

2. Introduction

Background

Equal and unimpeded access to residential housing is a fundamental civil right that enables members of protected classes, as defined in the federal Fair Housing Act, to pursue personal, educational, employment, or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials, and private citizens must embrace if social equity is to become a reality.

The federal Fair Housing Act prohibits discrimination in housing based on a person's race, color, religion, gender, disability, familial status, or national origin. In addition, the U.S. Department of Housing and Urban Development (HUD) issued a Final Rule on February 3, 2012 that prohibits entitlement communities, public housing authorities, and other recipients of federal housing resources from discriminating on the basis of actual or perceived sexual orientation, gender identity, or marital status. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This AI represents a regional collaboration between the State (represented by RIHousing and the OHCD) and the six grantee jurisdictions that receive funding directly from HUD. These include Cranston, East Providence, Pawtucket, Providence, Warwick and Woonsocket. Collectively, these six cities are referred to as the Entitlements throughout this document.

HUD awards funds from the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Housing Opportunities for Persons with AIDS (HOPWA), and Emergency Solutions Grant (ESG) programs directly to eligible municipalities. Administration of these programs for places other than these larger qualifying communities is given to the states, to enable states to respond to the needs of smaller local governments.

As administrators of HUD funding, RIHousing, the OHCD, and the six Entitlements have specific fair housing planning responsibilities including:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support initiatives to affirmatively further fair housing

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination and working toward its elimination
- Promoting fair housing choice for all people
- Providing racially and ethnically inclusive patterns of housing occupancy
- Promoting housing that is physically accessible to and usable by all people, particularly individuals with disabilities
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act

Since Rhode Island allocates HUD funding to subrecipients and does not undertake community development projects itself, available direct actions for furthering fair housing choice are limited at the state-level. The State must fulfill its responsibilities through incentivizing desired outcomes and discouraging or disallowing inappropriate activities. It cannot mandate that communities or developers submit certain projects for funding.

Purpose of the Analysis of Impediments

The Housing and Community Development Act of 1974 requires that any community receiving HUD funds affirmatively further fair housing. Communities receiving HUD entitlement funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, gender, disability, familial status, or national origin
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice (Al). An Al is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing. It is also an assessment of conditions, both public and private, affecting fair housing choice.

This AI will:

- Evaluate population, household, income, and housing characteristics by protected classes
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

An impediment to fair housing choice is defined as any action, omission, or decision that restricts or has the effect of restricting the availability of housing choices of members of the protected classes.

This AI serves as the basis for fair housing planning; provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and assists in building public support for fair housing efforts. RIHousing, OHCD and the Entitlements are each expected to review and approve the AI and use it for direction, leadership, and resources for future fair housing planning. The AI will serve as a point-in-time baseline against which future progress in implementing fair housing initiatives will be evaluated and recorded.

Methodology

A comprehensive approach was used to complete the AI. Some of the sources utilized including the following:

• The most recently available demographic data regarding population, household, housing, income, and employment at the census tract and municipal levels

- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes
- Fair housing complaints filed with HUD and the Rhode Island Commission for Human Rights
- Interviews and workshop sessions conducted with agencies and organizations that provide housing and housing related services to members of the protected classes

Use and Presentation of Data

The data used for the tables and maps in the Al covers the entire State and are presented as collective statewide conditions at the county level.

To ensure that the AI is as current as possible, most of the census data used in this report is American Community Survey (ACS) sample data rather than 2010 Census data. To make the best of sample-based ACS data and reduce sampling error, data compiled at five-year increments between 2013 and 2017 were used. Census 2010 Summary File 1 data were used as the most recent data source when 2013-2017 ACS data were unavailable. Census tracts were used as the smallest unit of geographic analysis, aggregated up to the county in some cases, and form the basis of most maps.

Public Engagement

The community outreach conducted for the AI was coordinated with three additional planning processes: the State of Housing in Rhode Island Plan, the five-year Consolidated Plan for RIHousing and OHCD, and the first year Annual Action Plan for RIHousing and OHCD. The complete summary of the community outreach plan is accessible online at https://www.rihousing.com/statewide-housing-plan/. Across all outreach initiatives, the most frequently cited needs related to fair housing include the following:

- Affordable housing needs
 - o Adequate funding at federal and state levels to develop more affordable housing and provide more rental assistance
 - o Adequate supply of affordable housing to meet the demand in urban and rural areas
 - o Support for affordable housing from local, regional and state officials
 - o Affordable housing accessible to people with disabilities
- Fair housing needs
 - o Support from local officials for all types of affordable housing, including emergency housing and permanent supportive housing
 - o Education for landlords
 - o Education for tenants on rights and responsibilities
 - o Education for the public
 - o Fair housing enforcement
- Community development needs
 - o Affordable transportation, including public transit with frequent service and service for second and third shift workers

- o Workforce housing development
- o Other supportive services to keep individuals and families housed—substance abuse treatment, case management, childcare

3. Progress Achieved since the 2015 AI

Rhode Island's last AI was conducted in 2015, identifying impediments at the State level and for each of the Entitlements. Each impediment and associated recommendation from the 2015 AI are listed below, along with a brief summary of the progress.

RIHousing & OHCD

2015 AI Recommendations	Status/Actions Undertaken
Elevate the importance of fair housing statewide	
Establish a permanent Fair Housing Advisory Committee.	A Fair Housing Advisory Committee has not yet been established, however Governor Raimondo has proposed a restructuring of the RIHousing Resources Commission which, if enacted, would allow for a greater focus on housing policy issues such as fair housing. A member representing fair housing interests is recommended for the proposed steering committee. In addition, a coalition of housing & community partners have formed under the banner of HomesRI. They are implementing a communications campaign focused on the state's housing needs & advocating for a legislative platform designed to increase resources and reduce barriers to access to affordable housing opportunities.
Entitlement Communities and the state will continue to take a regional approach to fair housing issues by regularly updating the Regional AI which addresses fair housing issues in entitlement communities and the state as a whole.	RIHousing, OHCD and the entitlement communities are currently in the process of updating the Regional AI.
Develop a set of metrics to measure disparities in living conditions and quality of life factors experienced by people within the classes protected by fair housing laws.	The 2020-2024 Consolidated Plan that is in the process of being developed and the update to the AI include an analysis of areas of high and low opportunity in the state as well detailed information on demographic change and areas of concentration of poverty. Proposed strategies include those designed to reduce disparities, particularly for protected classes.

2015 AI Recommendations	Status/Actions Undertaken
Reduce segregation and concentrated poverty and increase access to	quality affordable homes throughout the state.
Continue to prioritize state investment in affordable housing in communities with limited housing options.	The QAP and criteria for the award of state housing bond funds both give priority to the development and preservation of housing in areas with limited housing options. Bond funds have assisted development and preservation of affordable units in 32 out of 39 communities in Rhode Island. Almost half of bond assisted units are in communities that have not yet achieved their 10% affordable housing goal.
Provide technical assistance to municipalities to help them achieve 10% affordable housing goal and encourage a diversity of housing types and affordability.	RIHousing and OHCD work with municipalities regularly to provide technical assistance and resources to meet affordable housing goals. The two agencies also review the housing plans drafted by communities and provide feedback as part of the approval of local comprehensive housing plans.
Expand housing opportunities in areas of concentrated poverty through development of affordable deed-restricted housing or affordable market rate housing.	The QAP and criteria for the award of state housing bond funds both give priority to the development and preservation of housing as part of a broader community revitalization strategy.
Revitalize and strengthen urban areas for the benefit of existing and future residents. Develop a process for negotiating Community Benefit Agreements for projects of state significance that receive state or local subsidies, to ensure that a project's positive impacts (housing, neighborhood improvements, jobs etc.) will benefit current residents.	CDBG has, for certain activities, prioritized those efforts concentrating investments in designated distressed, predominately LMI neighborhoods.
Offer wealth building opportunities for residents living in subsidized housing. Expand Family Self Sufficiency and similar programs that help low-income households to achieve financial stability and build assets.	RIHousing and 10 other PHAs across the state administer FSS programs for public housing residents and housing choice voucher recipients. RIHousing has also been working with Project Based Section 8 developments to adopt FSS programs for their residents.

When state-level investments are provided to improve conditions in a low- or mixed-income area, couple these investments with a public process designed to identify strategies to ensure existing residents can remain in place as conditions improve.	The QAP and criteria for the award of state housing bond funds both give priority to the development and preservation of housing as part of a broader community revitalization strategy. RIHousing also recently completed a comprehensive community planning process to inform the redevelopment of an important deeply subsidized development in Upper South Providence.
2015 Al Recommendations	Status/Actions Undertaken
Address the need for a Fair Housing Information & Assistance Center	
Create a Fair Housing Assistance Center for Rhode Island to support education, advocacy and enforcement efforts, including routine testing programs.	SouthCoast Fair Housing, a nonprofit fair housing organization serving Bristol and Plymouth Counties in MA has expanded into RI. They have conducted several fair housing testing activities including testing in 2019 that resulted in a report documenting source of income discrimination in RI.
Expand outreach to real estate industry trade groups and practitioners for their input and involvement in fair housing education activities.	The Rhode Island Association of Realtors provides training for realtors on state and federal fair housing requirements, and opportunities to affirmatively further fair housing.
Update the Fair Housing Rhode Island Technical Assistance kit.	No updates made.
Update the Landlord Tenant handbook to reflect changes to all relevant fair housing laws and requirements.	OHCD is working with Roger Williams University to comprehensively update the handbook. This effort is still in progress.
2015 AI Recommendations	Status/Actions Undertaken
Provide and promote information on statewide housing opportunities	
Provide information in multiple languages on affordable housing opportunities throughout the state.	RIHousing maintains a Rental Resource Guide for all affordable housing in the state on its webpage in both Spanish and English. RIHousing also hosts HousingSearchRI.org, a website offered in English and Spanish that allows renters and homebuyers to search for currently available housing opportunities that meet their needs.
Implement a housing mobility assistance program to help connect low-income Rhode Islanders and those in protected classes to	RIHousing amended our PHA administrative plan in 2019 to prioritize voucher applicants who wish to live in high opportunity jurisdictions.

affordable housing opportunities throughout the state, with a particular focus on tenants with rental assistance vouchers.	
Work with RIHousing and other Public Housing Authorities to reduce barriers to the utilization of tenant-based rental vouchers in high opportunity areas. These efforts should include educating landlords about the benefits of accepting tenants with rental assistance and increasing the % of fair market rents (FMR) available to landlords if necessary.	For several years RIHousing has supported legislation that would ban housing discrimination based on a tenant's lawful source of income. RIHousing and the Providence Housing Authority have also conducted outreach to landlords to educate them about the benefits of the program. RIHousing has also adopted program changes to incentivize landlord participation including requiring inspection every other year, allowing tenants to move in before repairs if only minor issues are identified, offering reimbursement for tenant caused damages over the security deposit and moving to small area FMRs in expensive markets.
More effectively promote the Housing Locator (HomeLocatorRl.net) to improve utilization by private landlords and Rhode Islanders searching for an affordable home. Provide technical assistance on developing anti-displacement strategies for areas in which development is occurring or desired.	In 2019 the Housing Locator underwent a redesign and launch of a new and improved platform called, HousingSearchRI. The Asset Management team has begun compliance monitoring around the required use of HousingSearchRI.com by RIHousing-funded entities and the Housing Stabilization team launched a Landlord Engagement strategy to recruit new landlords for participation in the Housing Choice Voucher Program, with one of the benefits being the free listing service offered by HousingSearchRI.com.
Work with the resident organizations and advisory boards of Public Housing Authorities to provide a platform for residents to voice concerns and help residents connect with important services and opportunities such as mobility assistance and wealth building strategies.	No progress to report.
Work with Public Housing Authorities to encourage better coordination and collaboration, including exploring the possibility of a combined waitlist for the Housing Choice Voucher Program.	In 2017, RIHousing, in partnership with the Public Housing Association of RI and with support from the RI Housing Resources Commission, launched a centralized waitlist for housing choice

	vouchers. Currently, 17 PHAs are participating, and these PHAs control 94% of the HCVP vouchers in the State.	
2015 Al Recommendations	Status/Actions Undertaken	
Improve access to homeownership		
Actively promote RIHousing home loans, offered through the RIHousing loan center and the network of participating lenders throughout the State, particularly in neighborhoods with high concentrations of minority populations.	RIHousing actively promotes its mortgage products including down payment and closing cost assistance. 50% of our mortgages in 2019 went to minority borrowers.	
Continue to support and expand homebuyer and landlord training, financial literacy and foreclosure counseling classes.	RIHousing offers in person and on-line homebuyer education classes in English and Spanish, and is working on rolling out a post purchase counseling program. RIHousing's HelpCenter also provides assistance to homeowners trying to avoid foreclosure.	
2015 Al Recommendations	Status/Actions Undertaken	
Inform and improve mortgage lending practices		
Use HMDA data to track trends in home buying and mortgage lending over time. Identify lenders with high rates of loan denials involving members of protected classes and utilize the Community Reinvestment Act to influence lender conduct.	RIHousing currently offers its mortgage products through over 30 participating lenders.	
Working with industry partners, the Fair Housing Advisory Committee will work to recommend changes to state or federal lending policies or programs to address challenges to minority homeownership identified through research and data analysis.	As the federal government considers long-term reform of the GSEs, RIHousing, in partnership with the National Council of State Housing Agencies (NCSHA) has advocated for a strong continuing partnership with state housing finance agencies and a commitment to supporting affordable homeownership opportunities.	

2015 Al Recommendations	Status/Actions Undertaken
Address the ongoing foreclosure crisis	
Work through community-based organizations, such as DARE, to educate renters and homeowners about the state's new foreclosure protection laws and resources including foreclosure mediation, 'just cause' protection for tenants of foreclosed properties and free homeowner counseling through Rhode Island Housing's Help Center and other non-profits.	RIHousing has worked with the Attorney General's Office, the Department of Business Regulation and our community partners to raise awareness about protections offered to homeowners under the state's foreclosure mediation law. Nonprofit partners like the Center for Justice and Rhode Island Legal Services also provide information and support to low-income tenants and homebuyers about their rights under state law.
Make permanent the state's foreclosure mediation law (§34-27-3.2), which developed a statewide process for foreclosure mediation for homeowners who fall behind on their mortgage.	In 2018, the sunset of the foreclosure mediation act was extended until July 1, 2023.
Engage in testing for compliance with federal and state protections for homeowners and tenants in properties at risk of foreclosure or in the process of being foreclosed, including bank-owned properties.	No progress to report
Raise awareness about the Boston Community Capital SUN, or Stabilizing Urban Neighborhoods, foreclosure prevention program that works to prevent the displacement of families and the neighborhood destabilizing effects of vacancy and abandonment.	RIHousing HelpCenter staff and RIHousing's loan servicing staff inform eligible borrowers about the SUN initiative when working with homeowners facing foreclosure.
Raise awareness and provide education about the Federal Housing Administration's new program, "Back to Work – Extenuating Circumstances", which shortens the waiting period and provides opportunity for a new home loan following a foreclosure, short sale, deed-in lieu of foreclosure, or declaration of bankruptcy.	No progress made.

2015 Al Recommendations	Status/Actions Undertaken
Address housing needs of people with disabilities	
Re-convene the Olmstead Commission with the mandate to develop a comprehensive plan for serving Rhode Island residents with disabilities in the most integrated setting possible.	BHDDH re-convened this work group in 2019 and it met several times with a newly appointed staff member, Ruth Winograd at the helm.
Allocate sufficient resources to carry out the objective of creating new units of permanent supportive housing for people in institutions and at risk of institutionalization.	RI's HUD Section 811 Demonstration launched in 2016 and has secured 72 units, over half of the 150 awarded.
RIHousing, Rhode Island Department of Behavioral Healthcare, Developmental Disabilities and Healthcare (BHDDH) and the Executive Office of Health and Human Services (EOHHS) shall work together to implement the HUD Section 811 pilot program to integrate housing for persons with disabilities in affordable housing with supportive services.	RI's HUD Section 811 Demonstration launched in 2016 and has secured 72 units, over half of the 150 awarded.
Support community integration for people with disabilities through the provision of quality housing, transportation and supportive services.	See update above on implementation of Section 811 program.
Promote the use of the HomeLocatorRI.net website for affordable housing by accessibility features.	RIHousing maintains a Rental Resource Guide for all affordable housing in the state on its webpage in both Spanish and English. RIHousing also hosts HousingSearchRI.org, a website offered in English and Spanish that allows renters and homebuyers to search for currently available housing opportunities that meet their needs.
Encourage local Comprehensive Plans to address how the housing needs of people with disabilities, including those with significant disabilities, can be addressed.	Strategies to address the housing needs of special needs populations, including persons with disabilities, is a component of municipal housing plans included in Local Comprehensive Plans. The affordable housing bond has the goal of 30% units being set aside for special needs populations

Increase funding for the Access Independence program, which is funded through BHDDH and administered by RIHousing and provides loans to households in need of making crucial upgrades for accessibility improvements.	In her 2021 budget proposal, Governor Raimondo included language authorizing RIHousing to work with BHDDH to reallocate a portion of these funds to more effectively meet the needs of this population. The state has also capitalized a Livable Homes grant program administered by the Governor's Commission on Disabilities to provide matching funds for accessibility improvements to the homes of persons with disabilities and their caregivers.
Expand training on reasonable accommodations/modifications for staff and providers such as local housing authorities, community action agencies, etc.	No progress to report.
Advocate for the restoration of budget cuts to programs that provide supportive services to people with disabilities in community-based settings.	RIHousing, OHCD and community partners through the HomesRI coalition and the state's Continuum of Care continue to advocate for more resources for housing and supportive services for special needs populations including persons with disabilities. The state's Livable Homes program also provides resources to make accessibility improvements in the homes of persons with disabilities and their caregivers.
Expand the <i>Rhode to Home</i> Money Follows the Person (MFP) demonstration program.	This pilot was discontinued but MFP was reauthorized for an additional 5 years.
2015 Al Recommendations	Status/Actions Undertaken
Foster consistency with fair housing laws when planning for infrastruct	Ŭ.
Community Comprehensive Plans are required within the State of Rhode Island and are important in ensuring that an appropriate mix of housing opportunities is provided at the local level.	RIHousing continues to review and provide feedback on the housing element of Comprehensive Plans.
Update training materials previously developed around topics such as inclusionary zoning techniques; expand these to encourage the provision of by-right multi-family housing and deploy them as a	The Governor's proposed FY21 budget includes funding to provide technical assistance and incentive payments to cities in towns to assist them in removing barriers to housing development including updating and streamlining zoning ordinances.

means of furthering the obligation to analyze and modify rules, policies, and practices that may have potential discriminatory effects.	
Work to provide incentives that spur the production of multi-family affordable housing units within locally designated and state approved growth centers.	In her FY2021 budget proposal, Governor Raimondo included an incentive program similar to the 40S program in MA that would provide technical assistance and financial support to offset potential increases in education costs, to communities that implement overlay districts designed to stimulate housing development in areas close to jobs, services and transit.
Continue to actively train elected officials, governmental staff and property managers /developers on affirmatively furthering fair housing obligations and opportunities, as well as promoting inclusiveness in processes and decision-making.	These funds have been used to support education of community residents on rights and responsibilities related to fair housing.
Provide technical assistance to communities on developing anti- displacement strategies for areas in which development is occurring or desired.	No progress to report.
Work with RIPTA to site transit service near low- to moderate-income housing and near job centers to help create the essential housing/transit/jobs linkage.	RI is currently in the process of developing Transit ForwardRI 2040- the RI Transit Master Plan. As part of that process RIHousing shared GIS data on all subsidized housing developments in the state to better coordinate with transit routes.
2015 Al Recommendations	Status/Actions Undertaken
Advocate for Source of Income as a protected class Amend the state Fair Housing Practices Act to include "source of income" as a protected class so it would be illegal for landlords to discriminate against tenants based on their source of income.	RIHousing continues to support passage of legislation to end housing discrimination against tenants based on their lawful source of income. The City of Providence is also now considering a source of income discrimination ordinance.
Expand education and outreach to landlords in low poverty, high opportunity areas about the Housing Choice Voucher program and how it may benefit them as well as the tenants being assisted.	RIHousing and the Providence Housing Authority have conducted outreach to landlords to educate them about the benefits of the program. RIHousing has also adopted program changes to

2015 Al Recommendations	incentivize landlord participation including requiring inspection every other year, allowing tenants to move in before repairs if only minor issues are identified, offering reimbursement for tenant caused damages over the security deposit and moving to small area FMRs in expensive markets. Status/Actions Undertaken
Increase access to healthy housing	Status, regions offactuater
Educate tenants and landlords about the state's laws pertaining to safe and healthy housing, particularly with respect to lead laws and code violations.	RIHousing recently received an \$8.4 million grant to address lead and other health hazards in the cities of Pawtucket and Central Falls. Staff is working with the cities' building officials to require that lead hazards also be addressed if discovered as a result of a code enforcement call and connecting those landlords to lead hazard reduction resources.
Increase participation rate in lead-safe and lead-free certification programs.	The Housing Resources Commission has signed a MOA with the State Department of Health to increase compliance and enforcement of Lead hazard mitigation responsibilities.
Support permanent funding streams from the state for lead mitigation programs and continue to strengthen programs dedicated to making existing homes cleaner, safer and more energy efficient.	The state has funded lead hazard reduction through funding receiving from a portion of the state's conveyance tax. The Governor's FY2021 budget also proposes establishing a new dedicated funding stream funded through an increase in that tax on property values over \$500,000 to support additional housing production and preservation activities.
2015 AI Recommendations	Status/Actions Undertaken
Improve fair housing enforcement	
Increase funding for the Rhode Island Commission for Human Rights to support their enforcement efforts, including routine testing programs.	Funding for the RI Commission for Human Rights increased from \$1.55m to \$1.9m in the FY21 budget.
Strengthen education to landlords, tenants, banking and lending institutions, and the general public about fair housing laws.	CDBG funds have been used to support education of community residents on rights and responsibilities related to fair housing.

2015 AI Recommendations	Status/Actions Undertaken
Address institutional barriers to housing for ex-offenders	
The working group established by the Interagency Council on Homelessness shall continue to study this issue and make recommendations in consultation with public housing agencies, owners or managers of privately-owned subsidized housing, an agency providing reentry services to exoffenders, the Rhode Island Department of Corrections, and Rhode Island Legal Services.	The Interagency Council on Homelessness has not been actively meeting, however the RI Continuum of Care and the HRC continue to work on options for improving access to housing upon reentry. Crossroads RI also receives over \$1 million annually to provide housing placement services and assistance to sex offenders reentering the community.
offenders, the Rhode Island Department of Corrections, and Rhode	3 1

Cranston

2015 Al Recommendations	Status/ Actions Undertaken
Fair Housing Education	Ongoing
In addition to what is recommended at the State level, the Department of Community Development at the City of Cranston will continue to place posters provided by the National Fair Housing Alliance defining housing discriminatory practices. Posters in all languages are placed in all municipal buildings throughout the City.	In addition to what is recommended at the State level, the City of Cranston places posters provided by the National Fair Housing Alliance defining housing discriminatory practices. Posters in all languages are placed in all municipal buildings throughout the City.
Access to Affordable Homes	Ongoing
There is a need for more collaboration on local development efforts and a unified vision of the community to suit resident's needs. Provide initiatives to create the formation of Community Development Corporations in Cranston. The Cranston Housing Authority, the Office of Constituent Affairs, Comprehensive Community Action Program (C.C.A.P.) and the Cranston Planning Department will continue to encourage and promote collaboration with non- profit organizations, private developers, and the real estate industry to develop multi-family and single- family public housing units. CCAP, a large non-profit organization meets the State of Rhode Island's criteria of a Community Housing Development Organization. As the City's largest social service agency, CCAP owns and operates three multi- family homes and has 19 additional units at St. Matthews Rectory. All housing units are occupied by low/moderate income families.	The Cranston Housing Authority, the Office of Constituent Affairs, Comprehensive Community Action Program (C.C.A.P.) and the Cranston Planning Department continue to encourage and promote collaboration with nonprofit organizations, private developers, and the real estate industry to develop multi-family and single-family public housing units. CCAP, a large non-profit organization meets the State of Rhode Island's criteria of a Community Housing Development Organization. As the City's largest social service agency, CCAP has 19 units at St. Matthews Rectory, all for low/moderate income families.

Access to Healthy Housing

Presence of lead paint in older homes creates a continuing need abatement programs need to be continued. Although lead poisoning rates in the city have decreased significantly from 1999 to 2008 – from 4.7% to 1.1%, there remains a concern that landlords may not rent to families with children under 6 years old for fear of lead paint liability issues.

As noted in the statewide recommendations in Chapter 6, RIHousing continues to service the entire State's population with Lead Abatement. The City of Cranston continues to provide funds for first time homebuyer programs. These programs have proven to be very successful. Approximately 120 families have made Cranston their home since 2005 utilizing Down Payment and Closing Cost funds. All recipients must provide a Lead Safe Certificate before funds are released.

Ongoing

Presence of lead paint in older homes creates a continuing need abatement programs need to be continued. Although lead poisoning rates in the city decreased significantly from 1999 to 2008 – from 4.7% to 1.1% - there remains a concern that landlords may not rent to families with children under 6 years old for fear of lead paint liability issues.

The City of Cranston continues to provide funds for first time homebuyer and housing rehabilitation programs. These programs have proven to be very successful. All Closing Cost and Down Payment recipients must provide a Lead Safe Certificate before funds are released, and all housing rehabilitation projects must pass a lead inspection and have a Lead Safe Certificate before final payment is made. Also, a Lead Safe Certificate is required for any house acquired, rehabilitated, and subsequently sold to an income eligible household.

East Providence

2015 Al Recommendations	Status/ Actions Undertaken
Impediments to Fair Housing in East Providence	Ongoing
Tenants that are at or below 30% AMI and are housed in smaller multiunit buildings that are owned by individual landlords (landlords with 3 to 6 units) are the most common victims of fair housing violations such as evictions, no response for repairs or maintenance, retaliation by landlords for requests for repairs/maintenance.	Landlords with smaller multi-unit buildings serving tenants at or below 30% AMI remain the biggest challenge East Providence faces regarding fair housing. Landlords either provide substandard housing with little desire to improve quality of life or have tenants that are inconsistent with rent payments.
Research funding opportunities to capitalize a renovation program for small landlords that house at least 51% low to moderate income families who are sited with code violations. Priority would be targeted to those applicants with tenants who incomes were 30% AMI or lower. As part of the program, provide education on Fair Housing law, their responsibilities, tenant's rights, and resources to use when issues arise. Also provide fair housing education to their tenants as a separate training.	The City continued to work with the East Bay Coalition for the Homeless to have public participation in the form of meetings, surveys, and gathering of data in an effort to educate both landlords and tenants of the fair housing rights and obligations. While this has taken place to an extent, the issues of illegal evictions, sub-standard and non-safe housing remains a strong impediment to fair housing.
Provide outreach through East Providence Housing Authority landlords that participate in the Voucher Choice Program, City web page & Video of the Week feature, periodic newspaper notices and articles.	
Coordinate outreach and education efforts with the existing partnership between the City and Childhood Lead Action Project to provide further outreach to small landlords and their tenants.	
Focus program and outreach efforts initially in the two census tracks in the Downtown and Riverside areas that indicate higher density of	

lower income renters and landlords. Also focus on the older age of this subset of housing stock. Homebuyers with lower income and/or obvious ethnic backgrounds are also the victims of fair housing violations such as not being provided much time or effort, directed to substandard housing, or directed limited neighborhoods.

Homebuyer Education

Homebuyers with lower income and/or obvious ethnic backgrounds are also the victims of fair housing violations such as not being provided much time or effort, directed to substandard housing, or directed limited neighborhoods.

Facilitate more First Time Homebuyers education provided by the State for East Providence that incorporates fair housing issues for them to be aware of. Facilitate education curriculum such as Don't Borrow Trouble. Promote existing education opportunities for credits with the RI Association of Realtors® (RIAR), and work with RIAR to address other needs in their classes as issues arise. Reach out to state to help provide resources to be used.

Length of Time for Complaint Filings

The East Bay Coalition for the Homeless receives an average of 7-9 calls per week from tenants meeting the federal definition of at risk of becoming homeless. Some examples of these include evictions over the weekend, no due process given, no written notices or time is provided. For FY 2014, the average age of a case at closure was 308 days. The timeline needed for the process used to file a complaint with the Commission on Human Rights and Discrimination does not provide any practical recourse for these tenants. A "No Probable Cause" determination was rendered in approximately 39.4% of total

Ongoing

Discrimination to access affordable apartments continue as expressed by single headed households looking for more affordable units. Some of the affordable housing provided is substandard, not up to building or safety codes, and are not properly zoned. The CD Coordinator has responded by focusing efforts to provide resources for renovation and education to those property owners that may have the largest impact in helping to alleviate this situation. The CD Division continues to collaborate Childhood Lead Action Project to provide fair housing education targeted to public service providers and to landlords that accept Housing Choice vouchers.

Ongoing

Renters cannot afford to wait out the lengthy Fair Housing Complaint system as they are in immediate threat of becoming homeless. The City of East Providence is also finding the location of these units and the landlord(s) involved a major challenge as well. East Bay Coalition for the Homeless continues to receive the same number of calls per week.

processed cases. A significant number of No Cause findings resulted from a complainant's failure to pursue her/his charge by failing to respond to requests for information. This is thought to be in large part due to the process provided them represents no immediate solution to their situation or is overwhelming. Many are under the wrong impression of what the notice from their landlord means while others are naive to their rights or of any resources easily available to them.

Partner with the Coalition of Homeless Prevention and the Childhood Lead Action Project to gain more insight into these calls from tenants facing eviction. Analyze this information to identify ways to provide education to tenants before they are in crisis, identify what areas of the city to RI Regional Analysis of Impediments 137 August 14, 2015 focus this education in, provide fair housing education through community forums through existing community gathering to raise awareness, and facilitate more networking among local housing, public service, and health care service providers while offering fair housing education.

Steering of Home Buying/Rental Options

East Providence has neighborhoods that are considered better than others while some considered worse than others. Anecdotally, depending upon the perception given of income and race, real estate licensees or property managers sometimes suggest what they feel would be the neighborhood most likely to be similar to those perceptions. This results in steering low-income ethnic groups to housing and apartments that already have a higher density of this income and race group. This causes the further segregation of East Providence's neighborhoods.

Please refer to "Homebuyer Education" above

Work with the RI Association of Realtors® (RIAR) to better advertise and promote their fair housing training. In particular, work to connect fair housing education to organizations representing minorities, tenant groups, housing choice voucher participants, etc.	
Realtor, Landlord, and Tenant Fair Housing Laws Education	Please refer to "Homebuyer Education" above
While the realtor community seems to have better grasp of fair housing laws, landlords and tenants (especially landlords and tenants that are lower income) tend not to have a good grasp on fair housing law. It is felt that this lack of education contributes to all of the above stated issues especially evident in the number of calls received from tenants at risk of becoming homeless.	
The City of East of Providence supports the Statewide recommendations contained in Chapter 6.	

Pawtucket

2015 AI Recommendations	Status/ Action Undertaken
Fair Housing Education	Ongoing
Information on fair housing is not always accessible or well-publicized. The City of Pawtucket has contracted with Blackstone Valley Community Action Program to hold community seminars on a yearly basis. As discussed in Chapter 6, the City would benefit from a Statewide coordinated effort to help raise consciousness.	The city has allocated CDBG funds each year since 2015 to BVCAP to hold seminars and informational meetings. BVCAP is also the key contact for fair housing issues in the city; last year they assisted 29 clients with various housing issues.
Discrimination	Ongoing
Housing discrimination is not contained within political boundaries. The City of Pawtucket supports the Regional Analysis of impediments to remedy this issue.	The City of Pawtucket is working with the State to remedy discrimination locally.
Homeownership	Ongoing
In the City of Pawtucket, minorities are declined for mortgages at a higher rate. The City supports this issue being investigated at the State level.	The city did have a good record when it operated a First Time Home Buyer program, many of the clients assisted were minority. The program was suspended on July 1, 2017, as HUD regulations have increased on homebuyer assistance. The City supports Pawtucket Central Falls Development's homebuyer education classes, and some of the classes are offered in Spanish.
Zoning on Accessible Apartments	Ongoing
Given the City of Pawtucket's density of housing, it is not supportive of relaxing zoning with respect to accessory apartments.	The City of Pawtucket does have a process to allow accessory apartments through the zoning variance process. It could be cost burden for some homeowners, but it is available.

Language Barriers	Ongoing
The City of Pawtucket needs to do a better job of translating its housing programs into other languages, including Spanish. The City is supportive of working with the State on this issue.	As the Spanish population in Pawtucket increased from 19% (2010 Census) to 24% (ACS 2012-2017 Survey), the City recognizes the need for translation services. During the current five-year consolidated planning process, the community survey was made available in Spanish and Portuguese. During the October 17, 2019, Public Meeting on the five-year consolidated plan community needs, Spanish and Portuguese translators were available to assist non-English speaking citizens.
Barriers to Persons with Disabilities	Ongoing The City has made some progress with the Section 504 evaluation on
The City of Pawtucket has had a Section 504 evaluation conducted but has yet to complete all of the recommendations.	handicapped parking spots, but issues still exist, especially access to City Hall. When residents call requesting modifications to their home, the City directs them to Ocean State Center for Independent Living,
The City is diligent about making non-profit developers meet their accessibility requirements. More education is needed on this topic.	which can make small modifications to assist clients. The Governor's Commission on Disabilities also provides matching
The City would be supportive of a statewide program to provide retrofitting of existing housing units to make them accessible is needed.	funding for accessibility improvements in the homes of seniors with disabilities or their caretakers through the Livable Homes Modification Grant Program. The grant helps Rhode Island seniors and residents with disabilities make home modifications to allow them to remain in their homes.
Access to Healthy Housing	The City is very supportive of RIHousing's recent Lead Grant Application/Award, with \$8 million to be made available to mitigate
This City requires property owners to comply with the State's Lead Hazard Mitigation Act.	lead issues in the City of Pawtucket and the City of Central Falls.
	City funds will be used to leverage federal funding, assist with other home repairs needed in conjunction with lead hazard remediation.

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The Mayor of the City of Pawtucket routinely advertises for members of the public interested in serving on boards and commissions to express interest.

Ongoing

The City has seen a more diverse pool of applicants on boards and commissions, and the Mayor has been a strong supporter of inclusion. The Police and Fire have been reaching out to the minority community for a pool of applicants when recruiting.

Providence

2015 Al Recommendations	Status/ Actions Undertaken
Zoning and land use	Ongoing
The inspectional services process in Providence was described as arbitrary, capricious and time consuming. It was suggested that the inspection process must take the rehabilitation of existing housing versus new construction into account when inspections are conducted. The City's lack of an inclusionary zoning ordinance was noted but was not identified as an impediment because the City 's Comprehensive Permit Policy allows affordable housing developers to have zoning relief granted by the City Plan Commission for certain affordable	In 2016 the City adopted and deployed the new statewide permitting system called Viewpoint. This system, which replaced the ProvSmart program which had been introduced in 2014, allows for online application submissions, electronic status updates and response-time estimates. The website enables the City to review permits, while allowing developers to simultaneously track the progress of their permit applications in real time. Planning, zoning, and fire department reviews are coordinated through
housing developments. With the introduction of ProvSmart, the City's Online Permitting and	joint fire and inspections meetings and through the Interdepartmental Review Committee, which is required for all large land development projects.
Plan Review system, builders have an online dashboard where they can track and keep a record of all permits submitted to the City. This has greatly reduced the length of time for the permitting and inspection process. The City will continue to use this system.	Revisions to the zoning ordinance in 2014 permit greater housing density throughout the city as well as reduced parking requirements that can raise the cost of housing. The ordinance also allows for density bonuses for the provision of affordable housing.
	The City was the first community in Rhode Island to adopt Unified Development Review, which allows the City Plan Commission to grant zoning variances in conjunction with land development project review, thus streamlining the process for large, complex projects.
Access to fair housing information and education	Ongoing
The City is actively looking for partner organizations that can provide housing counseling in languages other than English.	The City has developed a Fair Housing & Equal Opportunity webpage, which provides resources to constituents seeking more information on fair housing, Section 3, and other FHEO programs. These resources are

2015 AI Recommendations	Status/ Actions Undertaken
Further, the City has engaged with the Roger William's University Law Clinic and the Rhode Island Center for Justice to assist with finding support for low-income renters that have been unfairly treated in the access or retention of housing in the City.	available in 6 languages (English, Spanish, Portuguese, Arabic, Khmer, and Chinese).
	The City established a partnership in 2015 with the Housing Network of Rhode Island, who implements a down payment and closing cost assistance program for low-income buyers on the City's behalf. This program couples robust bilingual homebuyer education with forgivable loans.
	The City has engaged with the Roger Williams University Law Clinic and the Rhode Island Center for Justice to provide legal services for low-income renters that have experienced housing discrimination or are living in substandard conditions.
	The City provided CDBG funding to the Center for Justice in order to boost legal aid to tenants in Federal Program Years 2017 and 2018.
	The City has identified non-federal resources to commit to the further provision of legal services for the low-income in 2019 and beyond. In 2020, the City intends to provide funding to a vendor (to be selected through competitive RFP process) to provide no-cost eviction defense to Providence residents as a Right-to-Counsel pilot.
Access to healthy housing	Ongoing
There is a need to support permanent funding streams for lead mitigation programs, increase education of tenants and landlords about the state's lead laws and increase the participation rate in leadsafe and lead-free certification programs.	The City of Providence applied for and received a Lead Hazard Reduction Demonstration and Healthy Homes grant from the Office of Lead Hazard Control and Healthy Homes and is engaged in a three-year effort to remediate up to 200 additional homes.
	The lack of maintenance of the City's housing stock means many housing units are in general need of repair and rehabilitation. In

2015 AI Recommendations	Status/ Actions Undertaken
	response, the City launched a "Home Repair Program" in 2015 that provides federal CDBG funds for 0% interest, deferred payment loans to qualifying homeowners and tenants to rehabilitate property. Taking a blended "whole house" approach, these funds are routinely aligned with the City's Lead & Healthy Homes grants and other programs available in the City to holistically address hazards, health and safety, code, energy efficiency, and quality of life issues in the property. The City leads quarterly meetings with partners working on lead
	poisoning prevention including the Department of Health, RI Housing, Community Action Partnership of Providence, and Childhood Lead Action Project. These meetings help partners coordinate efforts like shared messaging and outreach, as well as track collective progress towards eliminating lead poisoning in Providence.
Access to affordable housing	Ongoing
The City will work to increase the availability of good quality rental and home ownership opportunities throughout the city by continuing to work with and fund CDCs that are actively producing or rehabilitating units of affordable housing.	Since 2015, the City has invested over \$5.9 million in the construction, rehabilitation, or preservation of deed-restricted affordable rental and homeownership units for families at or below 80% of area median income.
	The largest investments were located in the City's Wanskuck, Charles, Manton, and Olneyville neighborhoods, serving to increase the supply of affordable housing units beyond the City's South Side.
	In 2019, the City passed legislation to create a dedicated funding stream (10% of all annual Tax Stabilization Agreement revenue) for the Providence Housing Trust. The Housing Trust will provide low- or no-

2015 Al Recommendations	Status/ Actions Undertaken
	interest construction lending and grants to support the development of deed-restricted affordable housing.
	In 2019, the City engaged a consultant to assist in the development of a Comprehensive Housing Strategy for the city, which will provide a tenyear "roadmap" for the development and preservation of housing in the City.
Transportation	Ongoing
Increased connections between housing and transit: The City will work with RIPTA to site transit service near low- to moderate-income housing and near job centers to help create the essential housing/transit/jobs linkage. Support the creation of a streetcar network in the City to provide additional transportation option for City residents.	Recognizing the need for better connectivity between neighborhoods and job centers, the City of Providence applied for and was awarded a sizable USDOT Transportation Investments Generating Economic Recovery (TIGER) grant. This grant, in partnership with RIPTA, will provide high-frequency transit service (every 5 minutes in each direction) between the Providence Amtrak/MBTA Station and Hospital District in Upper South Providence. There will be six paired stops along the corridor (the Downtown Transit Connector), each designed with a unique and highly visible identity. The stops will include shelters, real-time bus arrival signage, and other passenger amenities. The project will also include development of dedicated bus lanes and attractive public spaces around each stop. The \$17 million project is currently under construction with service beginning in January 2020. Projects will be implemented based on a prioritization system that takes equity, connectivity, safety, and demand into account.
	The City of Providence introduced the JUMP Bike Share Program in September 2018. More than a thousand e-assist bicycles are available citywide. JUMP offers a deeply-reduced rate (60 minutes of daily ride time for just \$5 for the first year) for City residents who meet eligibility requirements (public housing residents, recipients of SNAP, WIC or

2015 Al Recommendations	Status/ Actions Undertaken
2010 At Necestimonautons	other public benefits) as well as access for people without smartphones or credit cards.
	In 2018, the City of Providence launched an e-scooter share program, which in Fall 2019 expanded to include 600 e-scooters from two scooter-share companies. Both companies are required to equitably distribute their fleets throughout the city. Both companies also provide discounted rates for residents who qualify and provide access for people without smartphones, mobile location services, or credit cards.
	Throughout Summer and Fall 2019, the City placed hundreds of new bicycle racks throughout the City, with a particular focus on filling needs in an equitable way.
	In June 2019, the City released its Great Streets Master Plan— a vision and framework for specific public realm improvements citywide that will ultimately connect every Providence neighborhood to a safe, comfortable, high-quality network of public improvements where residents and visitors can walk, run, bike, scoot, and skate to get to schools, jobs, parks, and other important destinations.
	Throughout 2019, the City began engineering and implementation of several Great Streets projects that will help establish a citywide Urban Trail Network of on and off-road connections for people to walk, bike, and scoot along. Segments implemented include San Souci Drive in Olneyville Square, Clifford Street in Downtown, and Pine and Friendship streets in Upper South Providence. Segments currently being engineered include Broad Street in South Providence, the Promenade and Kinsley in Valley and Smith Hill, Broadway in the West End and Federal Hill, and South Water Street in Fox Point.

2015 AI Recommendations	Status/ Actions Undertaken
	Providence's Capital Improvement Plan (CIP) guides planned improvements to Providence's public infrastructure and funds capital improvements including improvements to repaving, sidewalks, parks, recreation centers, city buildings, and Great Streets (Complete Streets) citywide.
	In 2019, Providence, RIDOT, and RIPTA collaborated with May Mobility to pilot autonomous shuttle service in the City's Smith Hill, Valley, and Olneyville neighborhoods. The free shuttle provides ten-minute service along the Woonasquatucket corridor, filling a critical gap in the City's public transportation network.
Discrimination	Ongoing
Conduct a testing program on a metropolitan or statewide basis in the following areas: mortgage lending practices, rental housing industry, home sales, and insurance availability. Explore methods of creating fairness in insurance costs for properties in low-income areas. Work to eliminate credit scores as a basis for offering insurance. Monitoring trends at the state-wide level would help to identify and address discrimination in a comprehensive manner. Continue efforts of affirmative litigation to preserve and expand the rights of the City's low-income population to access quality affordable housing through nondiscrimination.	The RI Commission for Human Rights and the State Attorney's office conduct routine testing in the State of Rhode Island. The State of Rhode Island, unlike many other New England states, does not have any legal protections to prevent discrimination on the basis of lawful income. Many households in Providence continue to face discrimination by landlords who are unwilling to rent to voucher holders or households with income earned from SSI or SSDI. Source of income protections are invaluable in maximizing a voucher family's ability to secure safe and decent housing. In response, local legislation was drafted to prohibit discrimination on the basis of lawful source of income; at the time of this AI, this legislation is under review by the City Council Ordinances Committee.
	A comparable bill (S0331) was also proposed at the State level in 2019; it passed in the Senate but was "held" in House Judiciary. It's anticipated that this legislation will be revisited in 2020. The Providence Human

2015 AI Recommendations	Status/ Actions Undertaken
	Relations Commission will continue to advocate on behalf of this legislation and monitor its progress.
	The City supported the Providence Housing Authority's recent rule change relaxing its screening requirements for applicants with criminal backgrounds. The City will continue to monitor the rule change, and encourage similar protocols be adopted in other federally funded developments' Tenant Selection Plans.

Warwick

2015 Al Recommendations	Status/ Actions Undertaken
Access to Affordable Housing	Ongoing
The City of Warwick's OHCD (WOHCD) continues to be cognizant of ensuring geographic diversity for developments receiving support from the WOHCD and other sources, and to support the understanding of Fair Housing. The WOHCD continues to work with neighborhoods with regards to planning & redevelopment. The WOHCD, along with non-profit developers, will continue to assess the feasibility of the conversion of REO/foreclosed residential structures to affordable housing units throughout the jurisdictional boundaries of the City. The WOHCD will continue to offer an affordable financing incentive to property owners to make repairs to their properties and add new units of Section-8 housing units to the Warwick market. The WOHCD through the Community Development Block Grant Program will continue to provide resources to eligible neighborhoods to implement projects contained in their individual master plans. The	Efforts to continue current programs and collaboration will remain ongoing in regards to converting REO/foreclosed residential structures to affordable housing units, offering an affordable financing incentive to property owners to make repairs to their properties and for landlord's to add new units of Section 8 housing, and providing resources to eligible neighborhoods to implement projects contained in their individual master plans.
WOHCD staff meets with the neighborhood planning committees and attends neighborhood association meetings to offer guidance on future investments.	
Fair Housing Information and Enforcement	Ongoing
The Fair Housing Committee has been deactivated and all Fair Housing related issues that come to the WOHCD are handled internally among the WOHCD staff with the support of others knowledgeable in Fair Housing compliance. The WOHCD continues to	All Fair Housing related issues are handled internally by the WOHCD staff and with the support of others with knowledge and experience in dealing with Fair Housing related compliance. The WOHCD continues to work on ensuring information relating to WOHCD

2015 AI Recommendations

work on making information on the WOHCD's programs easily accessible and works to accommodate all interested parties in accessing its Programs. The WOHCD continues to support its many non-profits in their efforts to eliminate housing discrimination and support to those in the development of new housing opportunities.

The WOHCD plans to work closely with the proposed statewide Fair Housing Advisory Committee, as discussed in Chapter 6, to better leverage and assess Fair Housing related issues.

The WOHCD will continue to provide information on its Programs to area non-profits and to the City's Senior & Social Service Programs. Information will continue to be available on the City's website.

The WOHCD will continue to offer interpreter services for those that have limited English proficiency and the deaf and hard of hearing. In addition, those with limited mobility can request consultation in their homes if required.

The WOHCD will continue to provide funds to area non-profits for the acquisition and rehabilitation of properties into affordable housing units for both homeowners and renters.

Status/ Actions Undertaken

Programs is easily accessible and all interested parties interested in accessing WOHCD Programs can do so. The WOHCD continues to support its many non-profits in their efforts to eliminate housing discrimination and support the development of new housing opportunities.

Information on programs, interpreter services for LEP persons and persons with disabilities, and funding to local nonprofits for the acquisition and rehabilitation of properties into affordable housing units will continue.

Access to Healthy Housing

The WOHCD continues to offer financing to property owners interested in making their property lead safe.

The WOHCD will continue to provide affordable financing options to owners of pre-1978

Ongoing

The WOHCD will continue to offer affordable financing to property owners interested in making their property lead safe. In addition, the WOHCD will continue to partner with RIHousing's Lead Safe & Healthy Homes Program to further supplement the lead hazard reduction work and to ensure a more comprehensive approach to healthy housing.

2015 AI Recommendations	Status/ Actions Undertaken
residential properties to make their property lead safe. The WOHCD will continue to partner with RIHousing's Lead Safe & Healthy Home Program to further supplement the lead hazard reduction work and to ensure a more comprehensive approach to healthy homes. Housing Needs of People with Disabilities The WOHCD works with non-profits on a referral basis to assist them with their clients that are elderly, have mobility issues or are handicapper receiving services.	Ongoing The WOHCD will continue to work with non-profits that specialize in providing assistance to clients that are elderly, have limited mobility or are handicapped, and will continue to provide affordable financing options to qualifying individuals that are elderly and/or
The WOHCD will continue to provide affordable financing options to income eligible property owners that are elderly or are handicap or have mobility issues to make improvements to their property and remain in their home.	disabled to make improvements to their property and remain in their homes. The Governor's Commission on Disabilities also provides matching funding for accessibility improvements in the homes of seniors with disabilities or their caretakers through the Livable Homes Modification Grant Program. The grant helps Rhode Island seniors and residents with disabilities make home modifications to allow them to remain in their homes.
Diverse Local Representation	Ongoing
The WOHCD continues to advocate for representative diversity amongst the City's Boards and Commissions. The WOHCD will continue to communicate with the Mayor regarding	The WOHCD continues to advocate for representative diversity amongst the City's Boards and Commissions and communicate with the Mayor regarding appointments made to the City's Boards and Commissions be representative of the demographics in Warwick.
appointments made to the City's Boards and Commissions be representative of the demographics in Warwick.	Commissions be representative of the demographics in walkick.

Woonsocket

2015 Al Recommendation	Status/ Actions Undertaken
Woonsocket has growing minority communities: African Americans, Asians and Hispanic, now comprising almost 10% of the population. It is imperative that there be a positive, pro-active and inclusionary effort to promote housing choice throughout the City, although there are some neighborhoods that fall short in this area.	Ongoing The City recognizes its growing minority population. It pledges that all of its programs will include proactive, positive, and inclusionary efforts to promote housing choice in all areas of the city. As with other RI municipalities, the City looks to the State for guidance.
The City's tax rate is one of the highest in the State. This greatly impacts existing homeowners, first time buyers and renters. Some relief is provided to certain special needs groups with exemptions on the valuation of their properties, but more is needed, and the City's resources are very limited. One long-term direction that the City is moving forward on is the expansion of the Highland Industrial Park in the City. This will significantly expand the industrial tax base, as well as provide jobs for residents.	The Woonsocket Housing Authority (WHA) is pursuing the Transforming Rental Assistance initiative and finally will work with local non-profit groups to promote mixed financing for family units where possible, including pursuing state tax credit financing.
The City's supply of supportive housing for those with special needs is inadequate. Of particular concern to aging parents caring for adult children with mental, physical and developmental disabilities is ensuring that their children will have a safe, secure place to live when they pass on or are otherwise not able to care for them.	Ongoing The City recognizes the value of preventing homelessness and addressing the housing and supportive service needs of persons who are not homeless (elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with alcohol or other substance abuse problems) Emergency Solutions Grant funds will support the retooling of the crisis response by providing limited dollars for prevention. Community Care Alliance has received funds to divert those at risk of homelessness with cash assistance and intensive case management. The portion (32.5%) of ESG funds are utilized for Rapid Re-Housing for those who are in shelter and need cash

2015 Al Recommendation	Status/ Actions Undertaken
	assistance and case management to sustain housing. Road Home Emergency Housing Assistance (RHEHA) (RIHousing funded) will continue to assist families and individuals who are at risk of homelessness, particularly for those who are renting. Funding for this resource has been cut, but it is anticipated that approximately 300 clients will be assisted will be assisted with funds to remain in their housing or to move to more appropriate housing. Homelessness prevention is required even for those that own their homes. Foreclosures have decreased over the last year in Rhode Island. Low wages, decreasing property values and current unemployment put many residents in a precarious ownership position.
The City's supply of supportive housing and services for elderly and frail elderly residents is also inadequate. These households have serious issues of accessibility. The private housing in the City (walk-up tenements predominate) is particularly difficult for elderly tenants and homeowners to have unrestricted mobility. Most of these are existing units and therefore do not fall under the Americans with Disabilities Legislation. These conditions also hinder independent living.	Please refer to above. The Governor's Commission on Disabilities also provides matching funding for accessibility improvements in the homes of seniors with disabilities or their caretakers through the Livable Homes Modification Grant Program. The grant helps Rhode Island seniors and residents with disabilities make home modifications to allow them to remain in their homes.
The City's preference is for the rehabilitation and reuse of the existing stock rather than new construction, although it is recognized that the building code RI Regional Analysis of Impediments 139 August 14, 2015 requirements for this type of housing may make it economically unfeasible to indulge this preference.	

2015 Al Recommendation	Status/ Actions Undertaken
There are technological innovations for persons with sensory impairments which would facilitate their independent living, and the private housing in the City needs to be retrofitted to accommodate these households.	
There is no institution whose lending activity meets the needs of the City's low-income neighborhoods. There are extremely poor records for government insured mortgage lending. These mortgages have more liberal qualifying guidelines which are beneficial to prospective low-income home buyers. Loans for multifamily buildings (more than five units) constitute a significant percentage of the City's housing market, and loans are not offered to non-occupants.	Ongoing CDBG allocation priorities are always centered on low to-moderate income benefit, wise investments, and residents that are the most in need. There are several obstacles that will make it difficult to meet underserved needs. They include the cost of rehabilitation (including lead hazard reduction activities), as well as the inability of many lower-income homeowners to obtain traditional loans.
The greater frequency with which minority households are denied loans.	Please refer to above regarding recognition and prioritization of the inability for many homeowners to obtain traditional loans.
Lack of coordination of in the delivery of services and resources.	Public and assisted housing providers, private and governmental health, mental health, and service agencies are participants in the network, and are expected to continue active participation in the upcoming years. The City will also continue to work with neighborhood groups to address their critical issues. Through the Department of Human Service (DHS) and the City's Housing & Community Development (HCD)/ Minimum Housing Divisions (MHD), the City will better serve, coordinate, and address neighborhood concerns and problems. DHS and HCD/MHD staff support the City's outreach efforts for neighborhood participation by attending neighborhood meetings, disseminating information on

2015 Al Recommendation	Status/ Actions Undertaken	
	city programs, coordinating meetings between city staff and neighborhood leaders, and assisting with the implementation of neighborhood improvement projects.	
	The City's Community Development Forum brings residents, social service providers, business leaders, and city staff together to discuss critical community issues. Forums are held at least every six (6) months and 4 sessions during two (2) weeks in December. If an urgent need arises, a forum will be called to develop the best and most expeditious response.	

4. Demographic and Housing Summary

Introduction

This section of the AI analyzes the demographic and housing characteristics of the entire State of Rhode Island, focusing on members of the protected classes. The federal Fair Housing Act protects the following characteristics: race, color, religion, sex, national origin, familial status and disability status. Under State law, Rhode Island includes the following additional protected classes: marital status, sexual orientation, gender identity or expression, age (18+) and status as a victim of domestic violence. For the purposes of this AI, the data are presented and analyzed for the State of Rhode Island as a whole, separately for each of the six entitlement cities (referred to as "Entitlements") and for the remainder of the State outside of the six cities.

Populations Trends

Population of Rhode Island since 2000

The State's population has been stagnant with a slight 0.4% increase from 2000 to 2010 and a slightly slowed growth rate of 0.3% between 2010 and 2017. During these same time periods, the national population growth rates were 9.7% and 5.0%, respectively.

Figure 1 Rhode Island Population, 2000 – 2017

Year	Total Population	Change
2000	1,048,319	-
2010	1,052,567	0.4%
2017	1,056,138	0.3%

Source: U.S. Decennial Census, 2000-2010; American Community Survey five-year estimates 2017

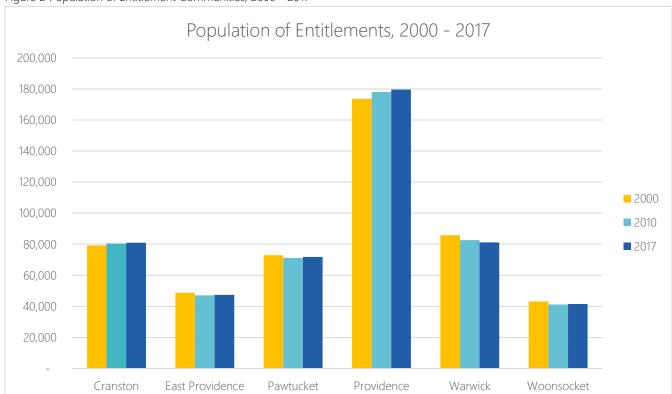
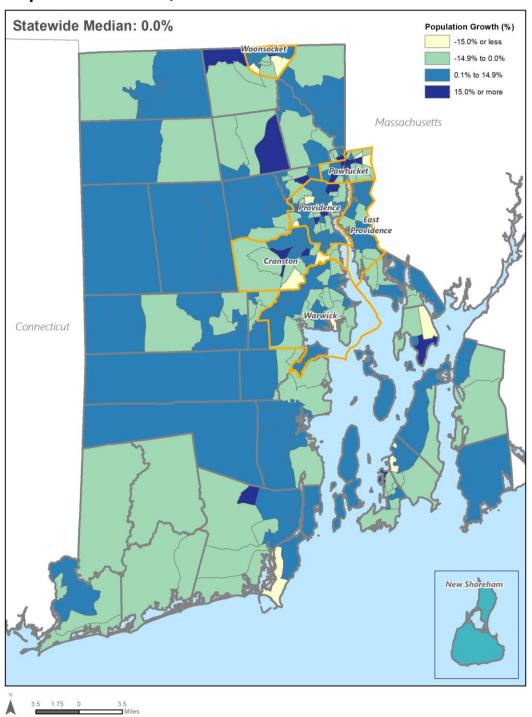


Figure 2 Population of Entitlement Communities, 2000 - 2017

Geographic variation in population growth from 2010 to 2017

Among all census tracts, the median population growth rate from 2010 to 2017 was 0.0%. Population growth rate varied across the State, resulting in a state-wide median growth rate of 0.0%. The largest changes occurred in more urbanized areas, such as the Entitlements. These cities contain areas with pockets of large population growth and decline, which are often adjacent to one another.

Population Growth, 2010-2017



Race and Ethnicity

The racial and ethnic composition of Rhode Island has become more diverse between 2010 and 2017. The non-White population increased slightly from 18.6% to 19.1%; the proportion of the population that identifies as Hispanic increased from 12.4% to 14.6%.

The growth rates of each racial/ethnic group have not been uniform between 2000 and 2017. While the overall population barely grew by 0.7%, the number of Black, Hispanic, and Asian persons have all greatly increased between 45% to 70%. Multi-racial persons and persons identifying as Other race also grew by nearly 10%.

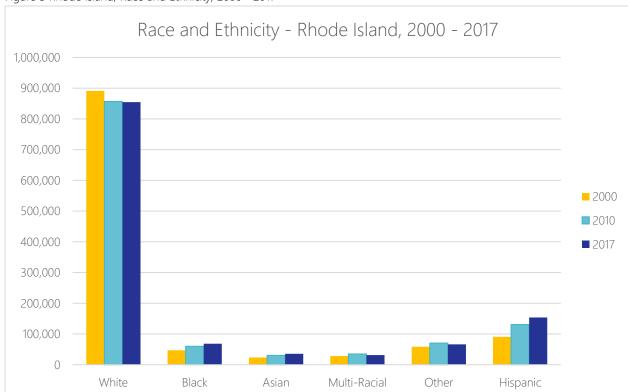


Figure 3 Rhode Island, Race and Ethnicity, 2000 - 2017

Race and Ethnicity - Cranston, 2000 - 2017 80,000 70,000 60,000 50,000 2000 40,000 2010 30,000 **2**017 20,000 10,000 White Black Multi-Racial Hispanic

Figure 4 Cranston, Race and Ethnicity, 2000 – 2017

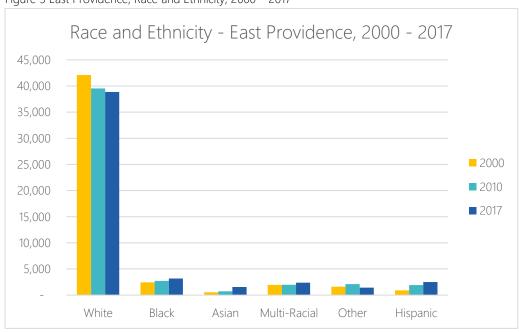


Figure 5 East Providence, Race and Ethnicity, 2000 – 2017

Race and Ethnicity - Pawtucket, 2000 - 2017 60,000 50,000 40,000 2000 30,000 **2010** 2017 20,000 10,000 White Black Asian Multi-Racial

Figure 6 Pawtucket, Race and Ethnicity, 2000 – 2017

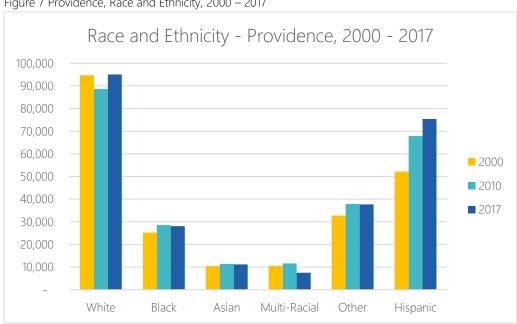


Figure 7 Providence, Race and Ethnicity, 2000 – 2017

Race and Ethnicity - Warwick, 2000 - 2017 90,000 80,000 70,000 60,000 2000 50,000 **2010** 40,000 2017 30,000 20,000 10,000 White Black Hispanic Asian Multi-Racial Other

Figure 8 Warwick, Race and Ethnicity, 2000 – 2017

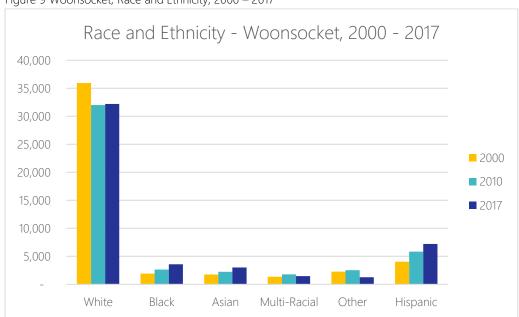


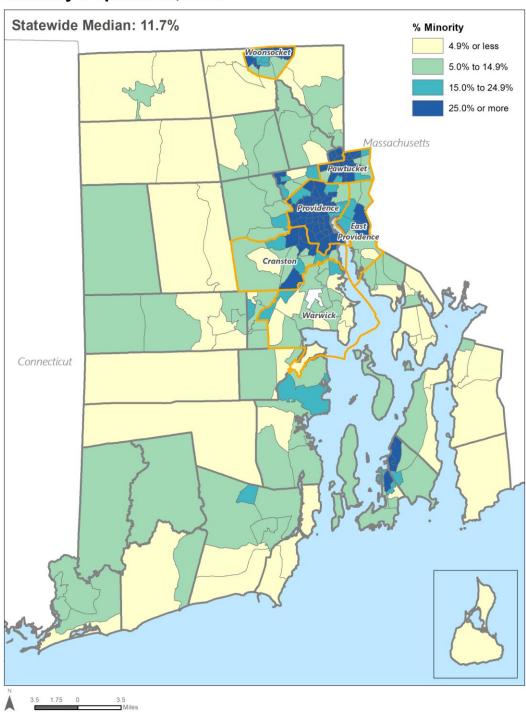
Figure 9 Woonsocket, Race and Ethnicity, 2000 – 2017

Geographic variation in race and ethnicity

While most of the Entitlements follow similar trends to that of the State between 2000 and 2017, there are some areas that stand out. Providence shows slower rates of growth in its non-White population with its multi-racial population experiencing a large decline of 28.7%. However, Providence also currently has one of the largest minority populations in the State, which may influence the rate of growth. Conversely, the smaller Warwick has experienced tremendous growth in all non-White populations except for its Black population, which experienced a slight decline of 1.0%.

Map 2 Non-White Residency Patterns, 2010

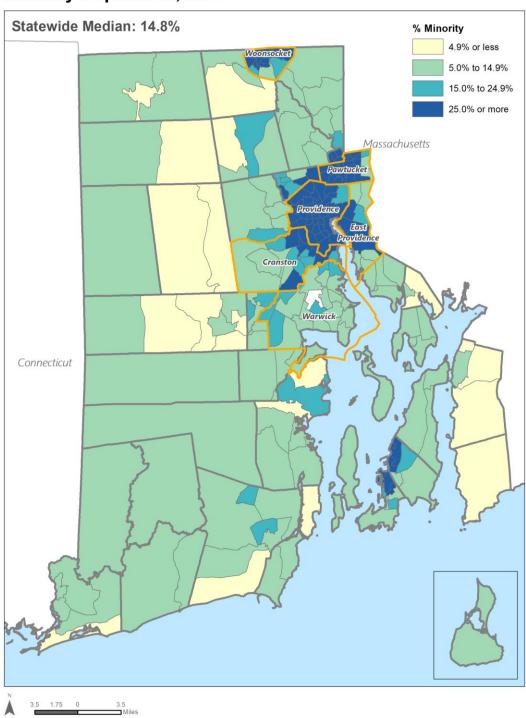
Minority Population, 2010



Source: Census 2010

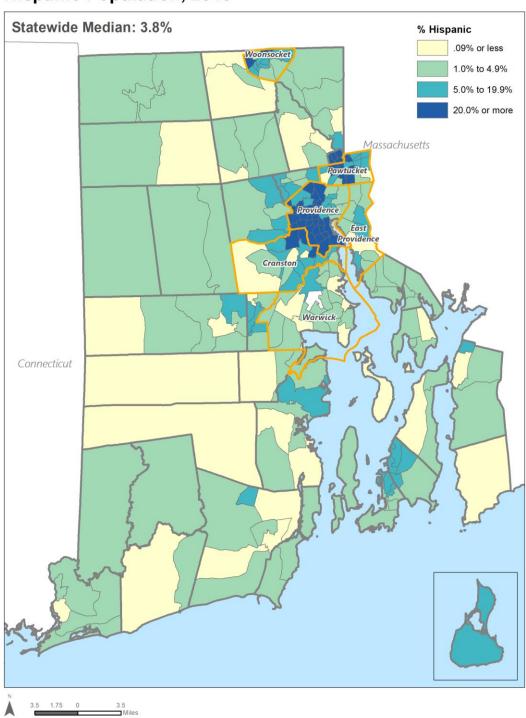
Map 3 Non-White Residency Patterns, 2017

Minority Population, 2017



Map 4 Hispanic Residency Patterns, 2010

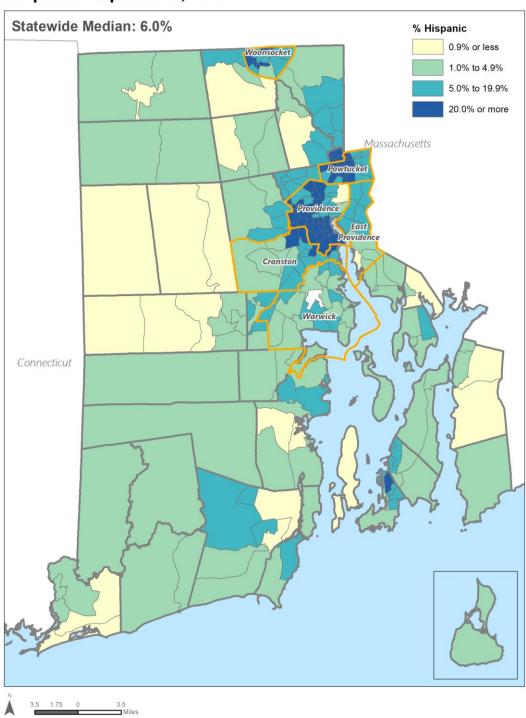
Hispanic Population, 2010



Source: Census 2010

Map 5 Hispanic Residency Patterns, 2017

Hispanic Population, 2017



Ancestry and National Origin

Foreign-born persons

It is illegal to refuse the right to housing based on place of birth or ancestry. Across Rhode Island, 15.8% of all residents were foreign-born. This rate was much lower than the Entitlement communities with available data. Children living in homes where at least one parent is foreign-born were significantly more likely to be living in poverty. In Rhode Island overall, children with at least one foreign-born parent are 1.5 times more likely to live in poverty than children with two native-born parents. While Cranston and East Providence reflect the same trends as the State, Pawtucket and Providence have foreign-born populations that are twice the percentage the State's. Additionally, families with at least one foreign-born parent have lower levels of poverty in Pawtucket and Providence compared to families with two native-born parents.

Figure 10 Foreign-born Population and Poverty Status of Households with Children, 2017

	Percent foreign-born of the population	Percent households in poverty with children and two native-born parents	Percent households in poverty with children and at least one foreign-born parent
Rhode Island	15.8%	14.5%	21.9%
Cranston	17.4%	9.7%	14.7%
East Providence	19.4%	12.0%	17.7%
Pawtucket	33.3%	27.2%	22.3%
Providence	41.2%	32.5%	30.0%
Remainder of State	8.7%	-	-

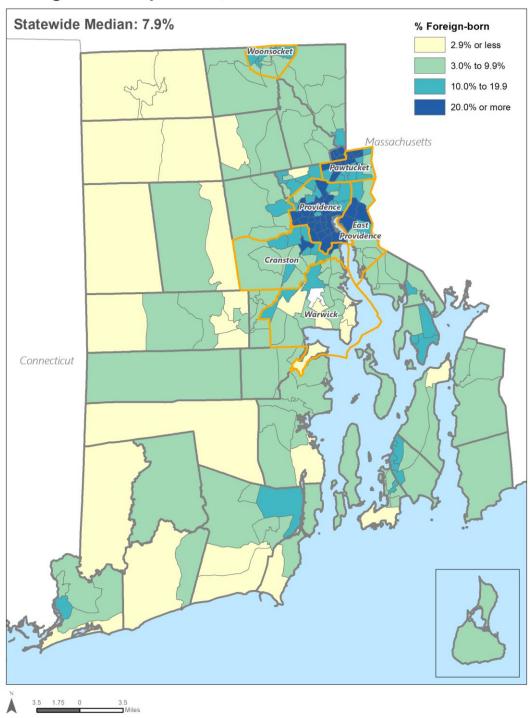
Source: 2013-2017 American Community Survey, 5-Year Estimates

Residency patterns of foreign-born population

In both 2010 and 2017, the foreign-born population primarily resided in the more urbanized areas around Providence. Moving further away from the metro area to the west, the foreign-born population begins to drop below the State median.

Map 6 Residency Patterns of Foreign-born Population, 2010

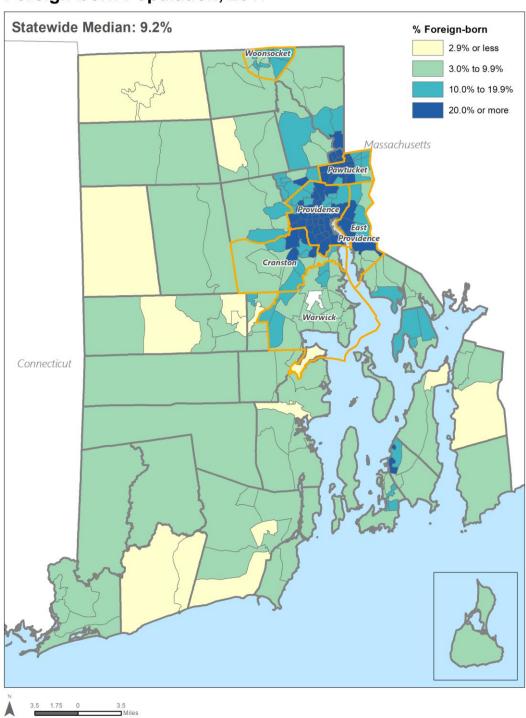
Foreign-born Population, 2010



Source: Census 2010

Map 7 Residency Patterns of Foreign-born Population, 2017

Foreign-born Population, 2017



Limited English Proficiency (LEP)

Persons with limited English proficiency (LEP) are defined as persons who have a limited ability to read, write, speak or understand English. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. The US Department of Justice provides guidance on complying with Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons through the LEP Safe Harbor Threshold. This provision stipulates that for each LEP group that meets a threshold of either 1,000 individuals or 5% of the population to be served (whichever is less), the written translation of vital documents must be provided for these non-English users.

The most recent LEP data available for the State comes from the 2013-2017 ACS; the most recent city-level data is from 2015. The largest LEP language group throughout the State is Spanish, which is spoken by 50,073 persons or 5.03% of the population. Within the Entitlement communities, Spanish is the most frequently spoken LEP language, meeting the LEP Safe Harbor threshold in four of the six of the Entitlements. The second largest group of persons with LEP speak Portuguese, which is spoken by 13,063 persons or 1.31% of the population, with the threshold met in East Providence, Pawtucket, and Providence. Other languages that meet the threshold within the Entitlements include French Creole in Pawtucket, and Mon-Khmer (Cambodian) and Chinese in Providence. Warwick's LEP community does not meet the LEP language threshold.

Figure 11 Most Common Languages Spoken Among Those with Limited English Proficiency in Rhode Island, 2017

Rhode Island			
		#	%
#1 LEP Language	Spanish or Spanish Creole	50,073	5.03%
#2 LEP Language	Portuguese/Portuguese Creole	13,063	1.31%
#3 LEP Language	Chinese	3,353	0.34%
#4 LEP Language	French Creole	2,367	0.24%
#5 LEP Language	Mon-Khmer (Cambodian)	2,143	0.22%
#6 LEP Language	French (incl. Patois, Cajun)	2,029	0.20%
#7 LEP Language	Italian	1,762	0.18%
#8 LEP Language	Laotian	1,540	0.15%
#9 LEP Language	African langs.	1,264	0.13%
#10 LEP Language	Arabic	1,083	0.11%

Figure 12 Most Common Languages Spoken Among Those with Limited English Proficiency in Cranston, 2015

	Cranston		
		#	%
#1 LEP Language	Spanish	2,580	3.38%
#2 LEP Language	Chinese	598	0.78%
#3 LEP Language	Portuguese or Portuguese Creole	477	0.63%
#4 LEP Language	Arabic	445	0.58%
#5 LEP Language	Mon-Khmer, Cambodian	403	0.53%
#6 LEP Language	Italian	333	0.44%
#7 LEP Language	Vietnamese	256	0.34%
#8 LEP Language	Russian	162	0.21%
#9 LEP Language	French Creole	128	0.17%
#10 LEP Language	Armenian	127	0.17%

Source: 2011-2015 American Community Survey, 5-Year Estimates

Figure 13 Most Common Languages Spoken Among Those with Limited English Proficiency in East Providence, 2015

	East Providence		
		#	%
#1 LEP Language	Portuguese or Portuguese Creole	2,705	6.11%
#2 LEP Language	Spanish	683	1.54%
#3 LEP Language	Chinese	235	0.53%
#4 LEP Language	Arabic	204	0.46%
#5 LEP Language	French Creole	133	0.30%
#6 LEP Language	Russian	69	0.16%
#7 LEP Language	Other Asian languages	41	0.09%
#8 LEP Language	Other Pacific Island languages	29	0.07%
#9 LEP Language	Tagalog	25	0.06%
#10 LEP Language	Armenian	22	0.05%

Figure 14 Most Common Languages Spoken Among Those with Limited English Proficiency in Pawtucket, 2015

	Pawtucket		
		#	%
#1 LEP Language	Spanish	5,301	7.97%
#2 LEP Language	Portuguese or Portuguese Creole	3,401	5.12%
#3 LEP Language	French Creole	1,222	1.84%
#4 LEP Language	French (incl. Patois, Cajun	428	0.64%
#5 LEP Language	Polish	225	0.34%
#6 LEP Language	Chinese	217	0.33%
#7 LEP Language	African	215	0.32%
#8 LEP Language	Russian	174	0.26%
#9 LEP Language	Arabic	103	0.15%
#10 LEP Language	Vietnamese	86	0.13%

Figure 15 Most Common Languages Spoken Among Those with Limited English Proficiency in Providence, 2015

	Providence		
		#	%
#1 LEP Language	Spanish	27,347	16.32%
#2 LEP Language	Mon-Khmer, Cambodian	1,546	0.92%
#3 LEP Language	Chinese	1,134	0.68%
#4 LEP Language	Portuguese or Portuguese Creole	1,073	0.64%
#5 LEP Language	French Creole	787	0.47%
#6 LEP Language	Laotian	477	0.28%
#7 LEP Language	African	391	0.23%
#8 LEP Language	Other Asian languages	309	0.18%
#9 LEP Language	Other Indic languages	296	0.18%
#10 LEP Language	Italian	282	0.17%

Figure 16 Most Common Languages Spoken Among Those with Limited English Proficiency in Warwick, 2015

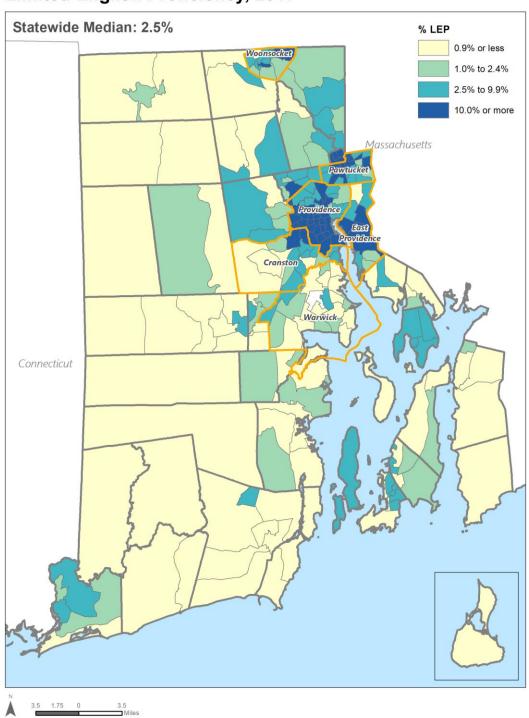
	Warwick		
		#	%
#1 LEP Language	Spanish	831	1.07%
#2 LEP Language	Portuguese or Portuguese Creole	508	0.65%
#3 LEP Language	Mon-Khmer, Cambodian	168	0.22%
#4 LEP Language	Chinese	140	0.18%
#5 LEP Language	Italian	123	0.16%
#6 LEP Language	Korean	115	0.15%
#7 LEP Language	Urdu	99	0.13%
#8 LEP Language	French (incl. Patois, Cajun)	82	0.11%
#9 LEP Language	Russian	78	0.10%
#10 LEP Language	Greek	53	0.07%

Figure 17 Most Common Languages Spoken Among Those with Limited English Proficiency in Woonsocket, 2015

	Woonsocket		
		#	%
#1 LEP Language	Spanish	1,513	3.93%
#2 LEP Language	French (incl. Patois, Cajun	351	0.91%
#3 LEP Language	Laotian	345	0.90%
#4 LEP Language	Polish	300	0.78%
#5 LEP Language	Vietnamese	178	0.46%
#6 LEP Language	Portuguese or Portuguese Creole	96	0.25%
#7 LEP Language	Chinese	77	0.20%
#8 LEP Language	Mon-Khmer, Cambodian	64	0.17%
#9 LEP Language	Arabic	49	0.13%
#10 LEP Language	African	44	0.11%

Map 8 Residency Patterns of Persons with LEP, 2017

Limited English Proficiency, 2017



Disability

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to engage in activities such as walking, climbing stairs, dressing, bathing, learning or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional disability, provided "reasonable accommodation" can be made. This may include changes to address the needs of persons with disabilities, such as adaptive structural changes (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In 2017, 13.3% of the population had at least one disability. Cognitive difficulties are more common in younger age groups, while ambulatory disabilities increase in older populations. Patterns observed at the State level are reflected at the local level, at least in the Entitlements.

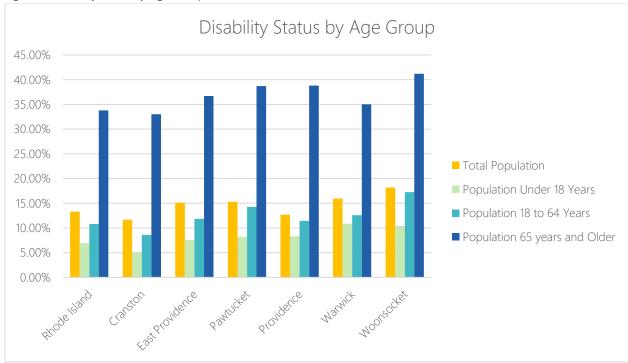


Figure 18 Disability Status by Age Group

Disability Type - Total Population with a Disability 70.00% 60.00% 50.00% With a hearing difficulty 40.00% With a vision difficulty 30.00% With a cognitive difficulty 20.00% With an ambulatory difficulty With a self-care difficulty 10.00% With an independent living difficulty 0.00% Nathick

Figure 19 Disability type in total population

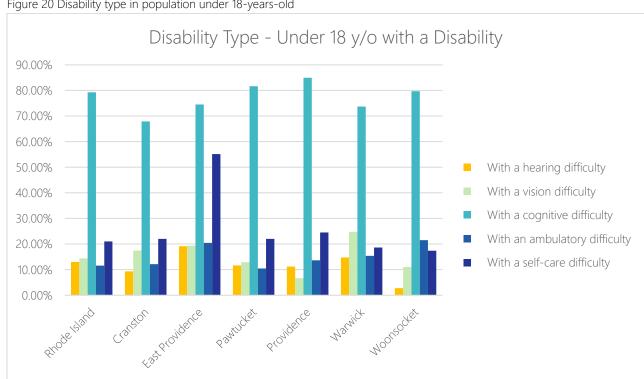


Figure 20 Disability type in population under 18-years-old

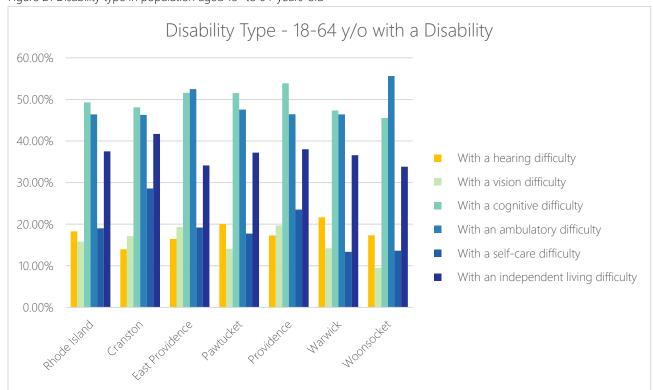
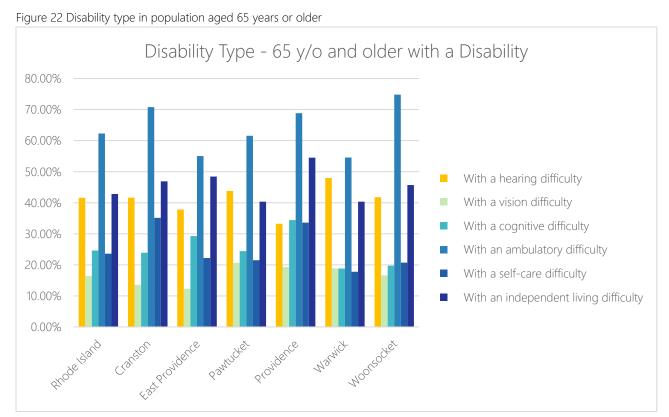


Figure 21 Disability type in population aged 18- to 64-years-old



Income and disability status

Among the civilian noninstitutionalized population between the ages of 18 to 64, there are significant differences in labor force participation rates among those with and without a disability; 45.8% of persons with a disability participate in the labor force compared to 83.2% of persons without a disability. Among those participating in the labor force, 14.6% of persons with disabilities are unemployed compared to 6.1% of persons without a disability. Among persons in the labor force with one or more disabilities, 17.7% of persons are living in poverty compared to 9.8% of persons without a disability. The median income for the disabled population was \$24,523 compared to \$35,546 for the non-disabled population. Even in the absence of discrimination, people with disabilities often experience greater obstacles in securing affordable housing that is accessible due to the higher potential for lower wages and rates of employment.

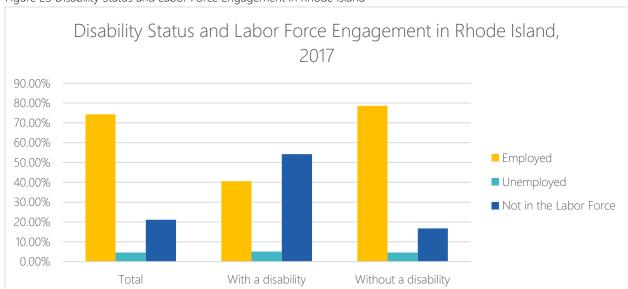


Figure 23 Disability Status and Labor Force Engagement in Rhode Island

Disability Status and Labor Force Engagement in Cranston, 2017 90.00% 80.00% 70.00% 60.00% Employed 50.00% Unemployed 40.00% 30.00% ■ Not in the Labor Force 20.00% 10.00% 0.00% With a disability Without a disability Total

Figure 24 Disability Status and Labor Force Engagement in Cranston

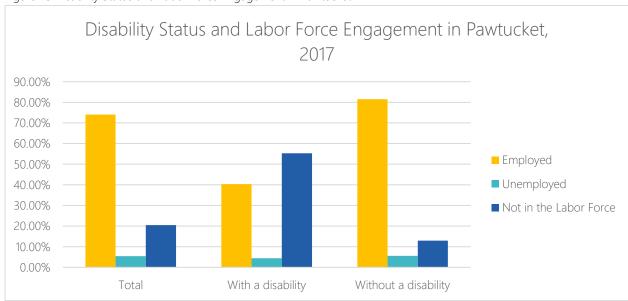


Figure 25 Disability Status and Labor Force Engagement in Pawtucket

Disability Status and Labor Force Engagement in Providence, 2017 80.0% 70.0% 60.0% 50.0% Employed 40.0% Unemployed 30.0% ■ Not in the Labor Force 20.0% 10.0% 0.0% With a disability Without a disability Total

Figure 26 Disability Status and Labor Force Engagement in Providence

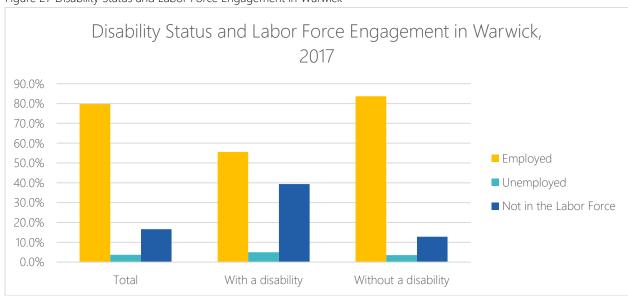


Figure 27 Disability Status and Labor Force Engagement in Warwick

Families with Children

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families, and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

In 2017, family households comprised 62.7% of all households, virtually unchanged from 62.8% in 2010. The number of married-couple families in Rhode Island has also increased slightly to 71.1% of all households from 70.9% in 2010. This change is comparable to the stagnant population growth seen in the general populace.

Female-headed households with children often experience difficulty in obtaining housing as a result of lower incomes and higher expenses such as childcare. In 2017, 37.6% of female-headed households with children were living in poverty compared to 18.1% of male-headed households with children and 5.6% of married-couple households with children. Poverty rates for households with children are generally higher in Pawtucket, Providence, and Woonsocket than the rest of the State and other Entitlements.

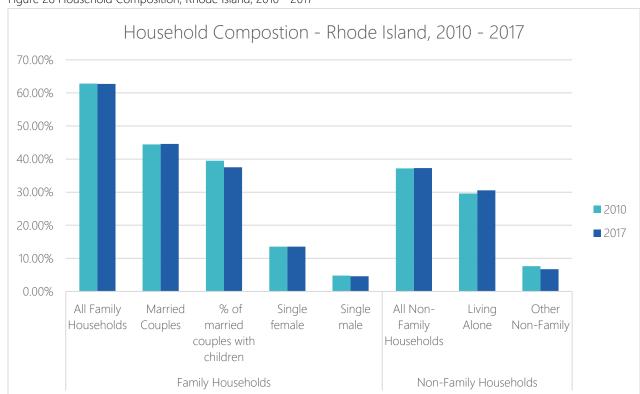


Figure 28 Household Composition, Rhode Island, 2010 - 2017

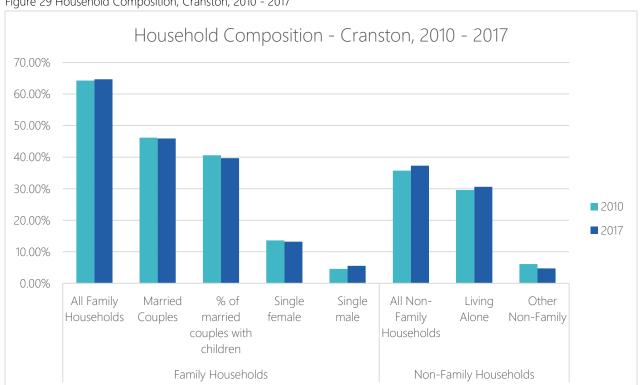


Figure 29 Household Composition, Cranston, 2010 - 2017

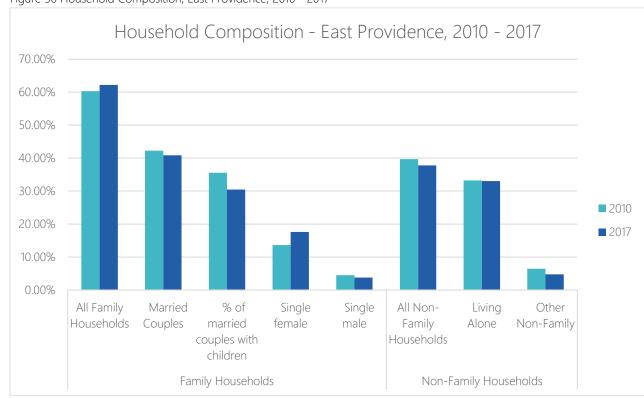
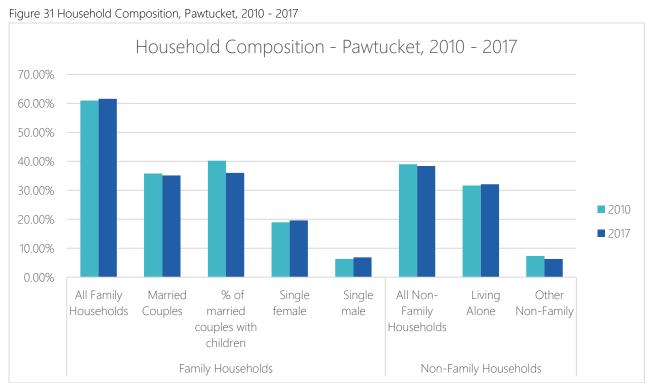


Figure 30 Household Composition, East Providence, 2010 - 2017



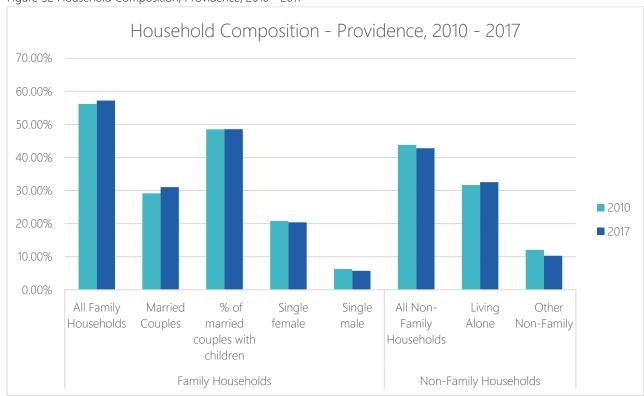
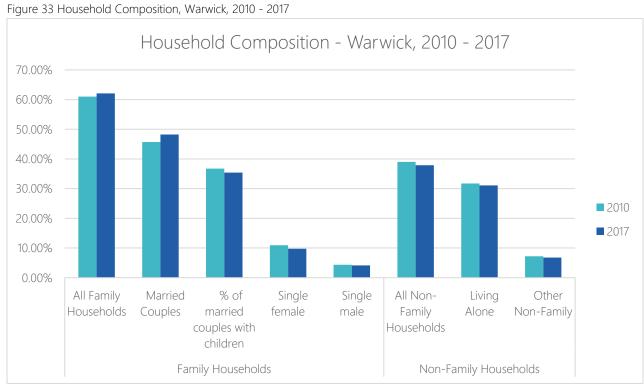


Figure 32 Household Composition, Providence, 2010 - 2017



Household Composition - Woonsocket, 2010 - 2017 70.00% 60.00% 50.00% 40.00% 30.00% 2010 20.00% **2017** 10.00% 0.00% All Family % of Single Single All Non-Married Living Households Couples married female male Family Alone Non-Family Households couples with children Family Households Non-Family Households

Figure 34 Household Composition, Woonsocket, 2010 - 2017

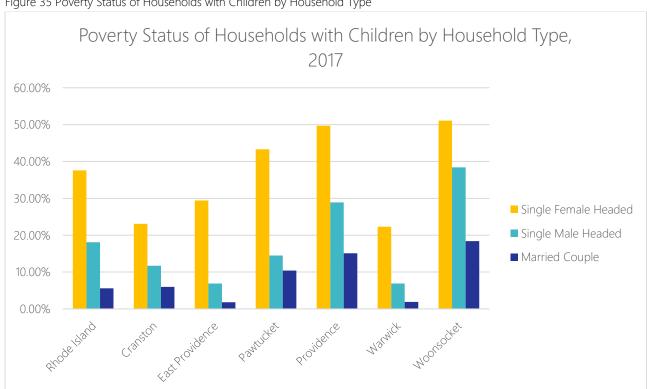


Figure 35 Poverty Status of Households with Children by Household Type

Income, Unemployment and Poverty

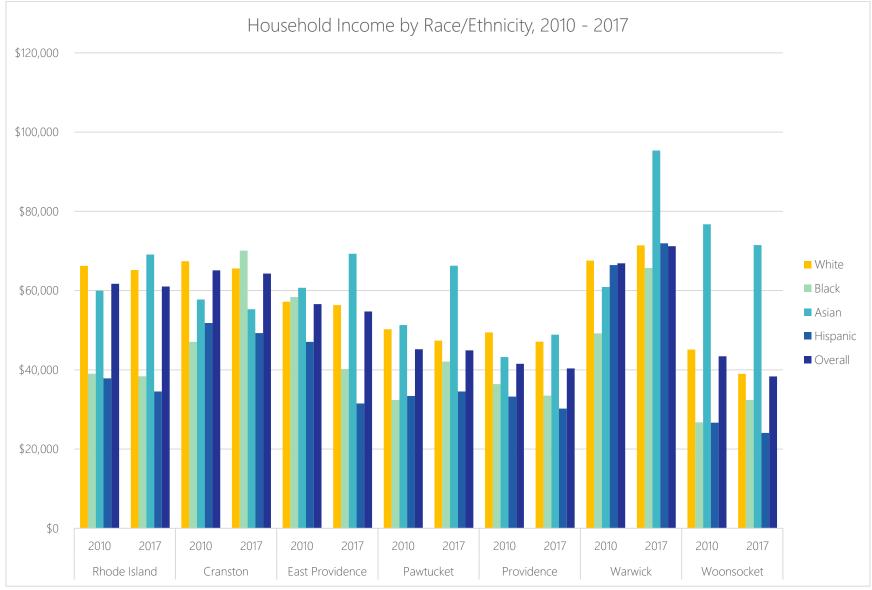
Household income

Household income is strongly related to housing choice, as household income is one of several factors used to determine eligibility for a home mortgage loan or rental lease. Additionally, lack of income inherently reduces the number of options a household has when determining where to live.

The 2017 Rhode Island median household income was \$61,043, higher than the national average of \$57,652 by 5.9%. When adjusted for inflation, Rhode Island household income decreased marginally by 1.6% between 2010 and 2017. With the exception of Asian persons - whose incomes increased by 15.2% - wages have declined or stagnated. Hispanic persons had a significantly larger decrease at 8.8% in household income relative to other groups, which decreased at most by 1.6%.

However, in the Entitlements, there are many features distinct from the State. East Providence shows more exaggerated declines in the median income for Black and Hispanic persons between 2010 and 2017 at -31.1% and -33.1%, respectively. In Cranston, Pawtucket, Warwick, and Woonsocket, Black persons showed increases in household income between 2010 and 2017 at rates of 21.1% or higher. Warwick in particular stood out with all groups showing increases in median household income, especially in Black and Asian households at 33.6% and 56.6%, respectively. Notably, Warwick has relatively small Black and Asian populations.

Figure 36 Household Income by Race/Ethnicity, 2010 - 2017



Unemployment rates by race

The 2017 Statewide unemployment rate was 6.8%. With an unemployment rate of 6.4%, males were slightly more likely than females to be unemployed. White and Asian persons were unemployed at 6.1% and 5.3%, respectively, while Black and Hispanic persons had unemployment rates of 10.9% and 11.2%, respectively. Pawtucket, Providence, and Woonsocket experienced higher rates of unemployment compared to the State and other Entitlements; the remaining Entitlements show similar trends or lower rates of unemployment compared to the State.

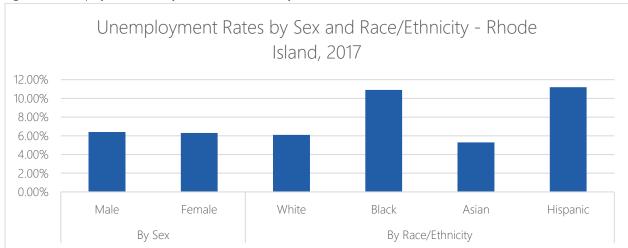
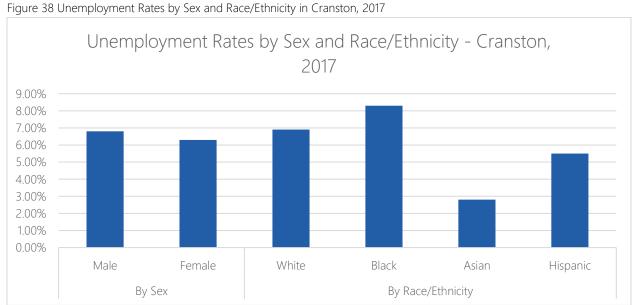


Figure 37 Unemployment Rates by Sex and Race/Ethnicity in Rhode Island, 2017

Source: 2013-2017 American Community Survey, 5-Year Estimates



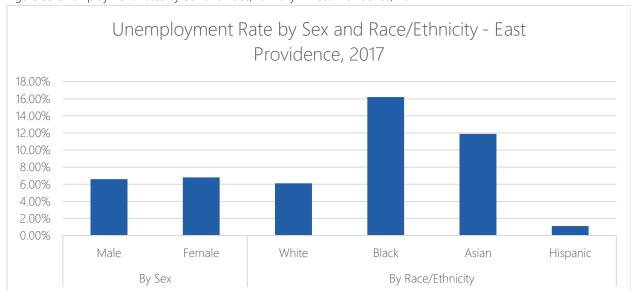


Figure 39 Unemployment Rates by Sex and Race/Ethnicity in East Providence, 2017

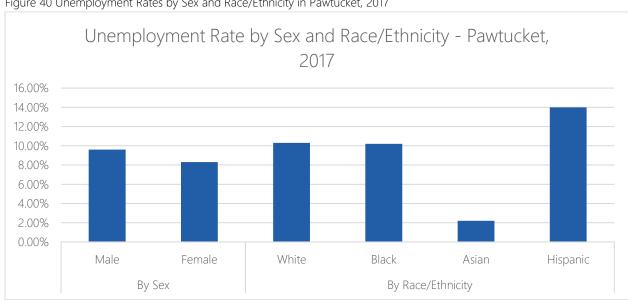


Figure 40 Unemployment Rates by Sex and Race/Ethnicity in Pawtucket, 2017

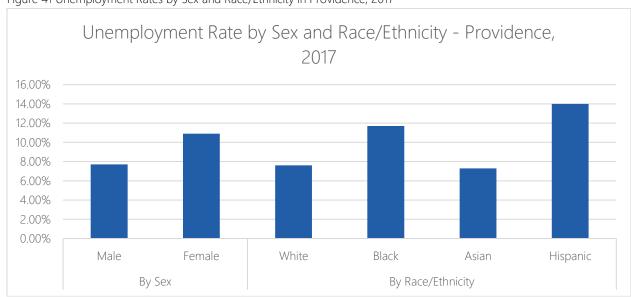


Figure 41 Unemployment Rates by Sex and Race/Ethnicity in Providence, 2017

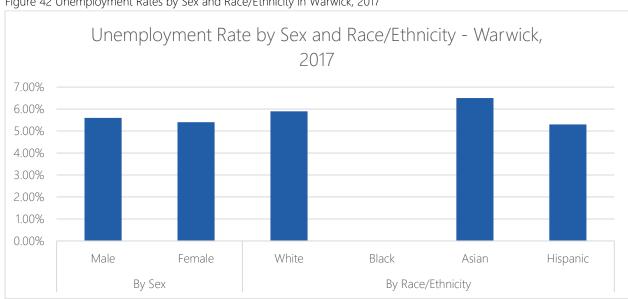


Figure 42 Unemployment Rates by Sex and Race/Ethnicity in Warwick, 2017

Unemployment Rate by Sex and Race/Ethnicty - Woonsocket, 2017 16.00% 14.00% 12.00% 10.00% 8.00% 6.00% 4.00% 2.00% 0.00% Male White Black Hispanic Female Asian By Sex By Race/Ethnicity

Figure 43 Unemployment Rates by Sex and Race/Ethnicity in Woonsocket, 2017

Poverty rates

The poverty rate in Rhode Island was 13.4% in 2017 - up from 12.2% in 2010 and similar to the national rate. The only racial groups with below average poverty rates are Whites and Asians. In 2017, the poverty rates among Black and Hispanic persons was 24.0% and 28.9%, respectively. The poverty rates are even higher in Pawtucket, Providence, and Woonsocket among the Black and Hispanic populations. The remaining Entitlements have lower rates of poverty compared to the State. A lack of income severely restricts housing choice. Members of the protected classes are disproportionately affected by this issue, as they are far more likely to have lower incomes or live in poverty.

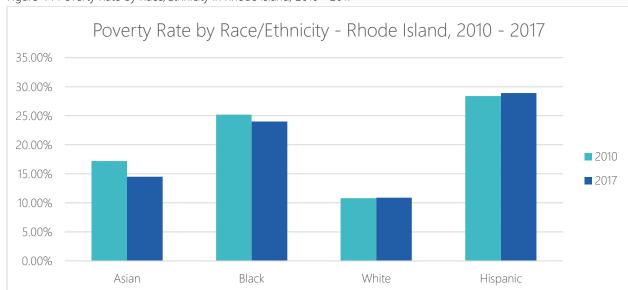


Figure 44 Poverty Rate by Race/Ethnicity in Rhode Island, 2010 - 2017

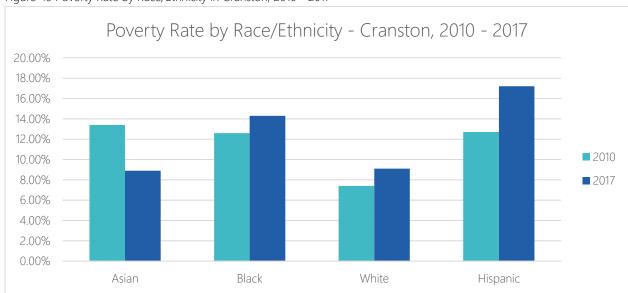


Figure 45 Poverty Rate by Race/Ethnicity in Cranston, 2010 - 2017

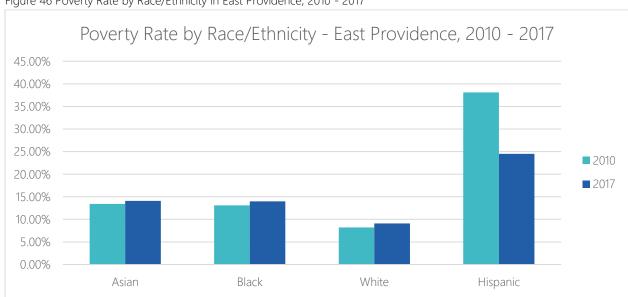


Figure 46 Poverty Rate by Race/Ethnicity in East Providence, 2010 - 2017

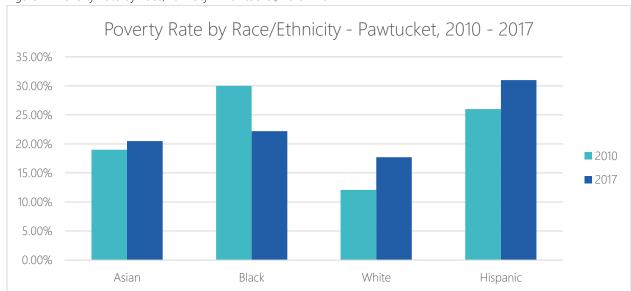


Figure 47 Poverty Rate by Race/Ethnicity in Pawtucket, 2010 - 2017



Figure 48 Poverty Rate by Race/Ethnicity in Providence, 2010 - 2017

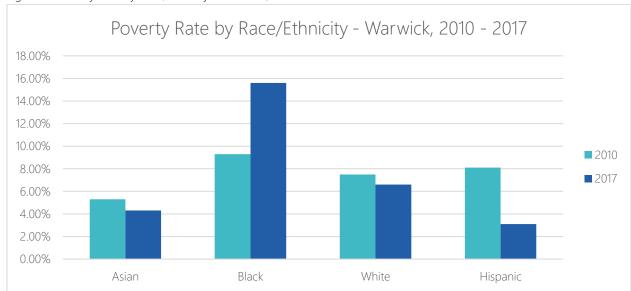


Figure 49 Poverty Rate by Race/Ethnicity in Warwick, 2010 - 2017



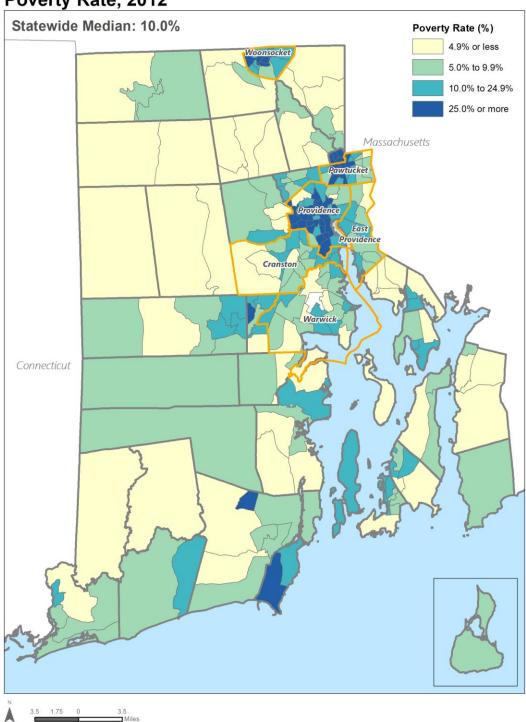
Figure 50 Poverty Rate by Race/Ethnicity in Woonsocket, 2010 - 2017

Source: 2013-2017 American Community Survey, 5-Year Estimates; Census 2010

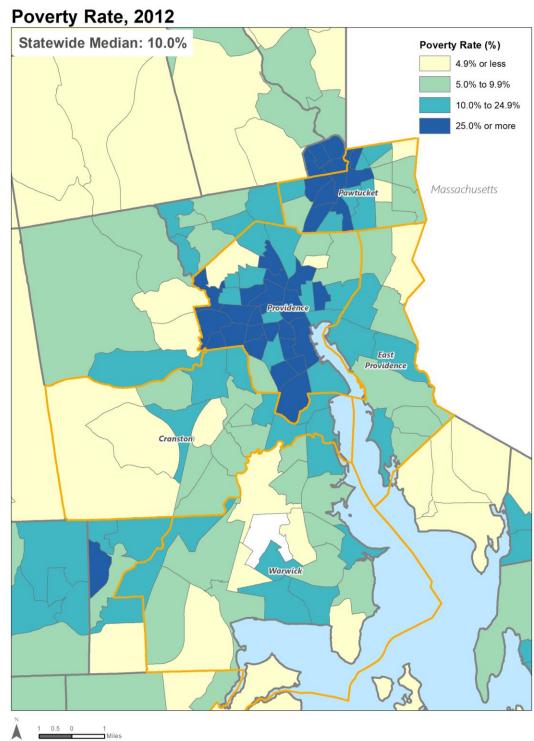
On the following maps, higher rates of poverty dominate the Providence metro area, including Pawtucket and near Woonsocket.

Map 9 Poverty Rates, 2012

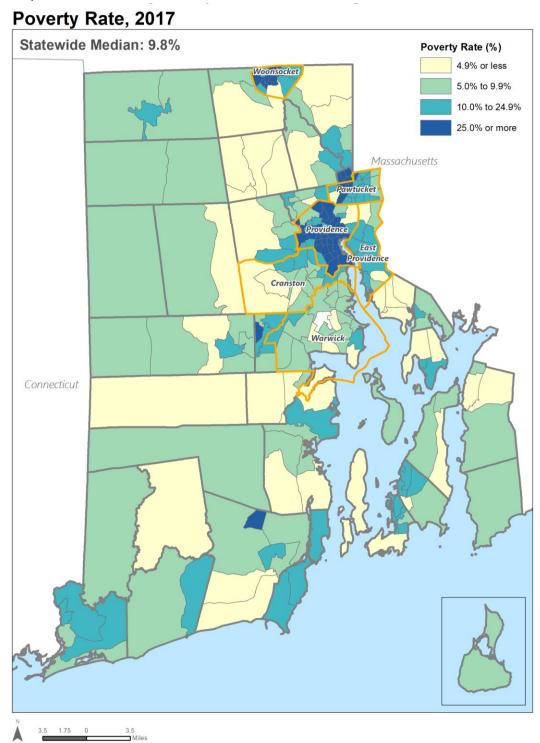
Poverty Rate, 2012



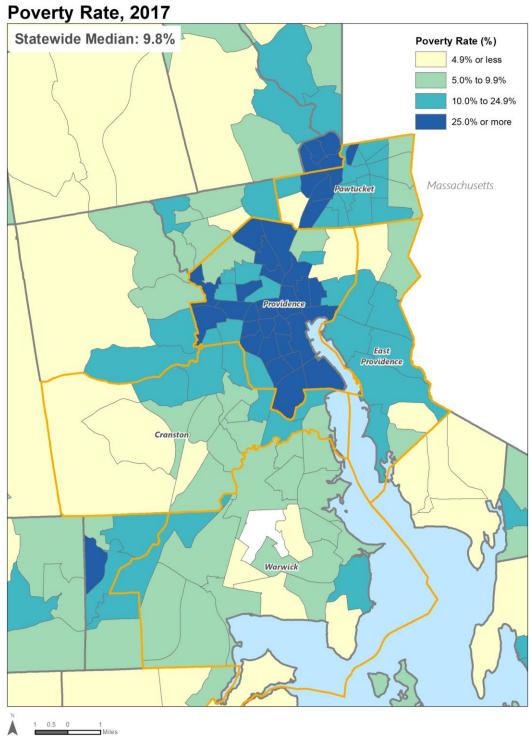
Map 10 Poverty Rates around the Providence Metro Area, 2010



Map 11 Poverty Rates, 2017



Map 12 Poverty Rates around the Providence Metro Area, 2017



Housing Tenure, Household Size and Unit Size

Housing tenure

Homeownership rates and rental rates have remained stagnant with only a 0.7% change between 2010 and 2017. Homeownership rates remain higher at 60.0% in 2017. There are, however, significant variations by race. In 2010, all races except Whites had renter rates between 52.9% (Asian) and 72.8% (Other races). This pattern was largely unchanged in 2017. Renter rates among White were below 35.0% in both 2010 and 2017.

In 2010, homeownership rates among non-White households were lower than White households; while 65.3% of White households were homeowners, only 32.0% of Black and 27.2% of Hispanic households owned their homes. By 2017, the Statewide homeownership rate decreased very slightly by 0.5 percentage points to 60.0%. White and Hispanic homeownership rates also decreased by only 0.5 percentage points; Black homeownership rates decreased by 0.6 percentage points. Asian households were the only group to show an increase in homeownership rates at 1.7%.

Homeownership rates in Entitlements between 2010 and 2017 also showed similar stagnant growth trends. However, there was geographic variation in homeownership rates, both overall and between racial groups. Pawtucket (43.7%), Providence (34.7%), and Woonsocket (36.8%) generally have much lower rates of homeownership compared to Rhode Island (60.0%) and the other Entitlements. Minorities in these communities also experienced lower homeownership rates relative to the State. Cranston and Warwick were the only Entitlements with higher rates of homeownership overall and within all racial/ethnic groups compared to the State.

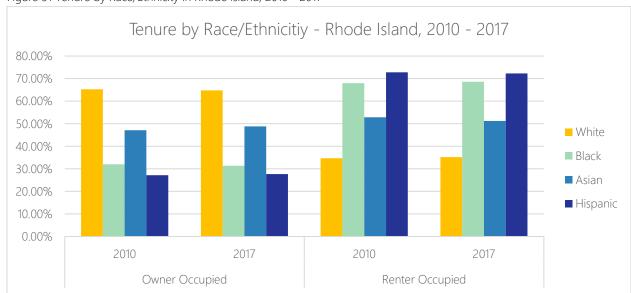


Figure 51 Tenure by Race/Ethnicity in Rhode Island, 2010 - 2017



Figure 52 Tenure by Race/Ethnicity in Cranston, 2010 - 2017

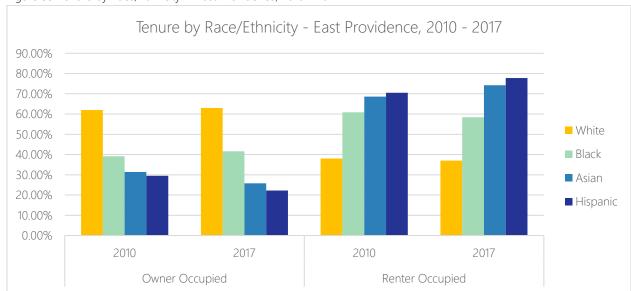


Figure 53 Tenure by Race/Ethnicity in East Providence, 2010 - 2017

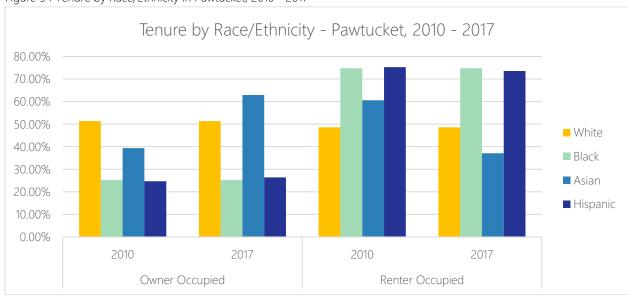


Figure 54 Tenure by Race/Ethnicity in Pawtucket, 2010 - 2017

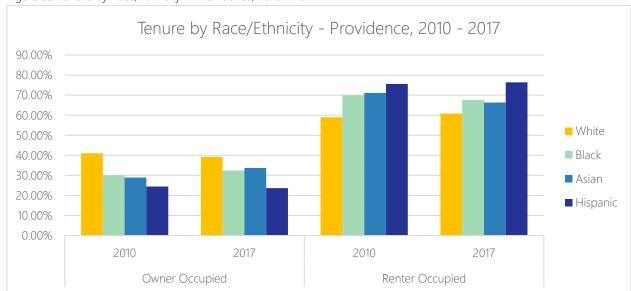


Figure 55 Tenure by Race/Ethnicity in Providence, 2010 - 2017



Figure 56 Tenure by Race/Ethnicity in Warwick, 2010 - 2017

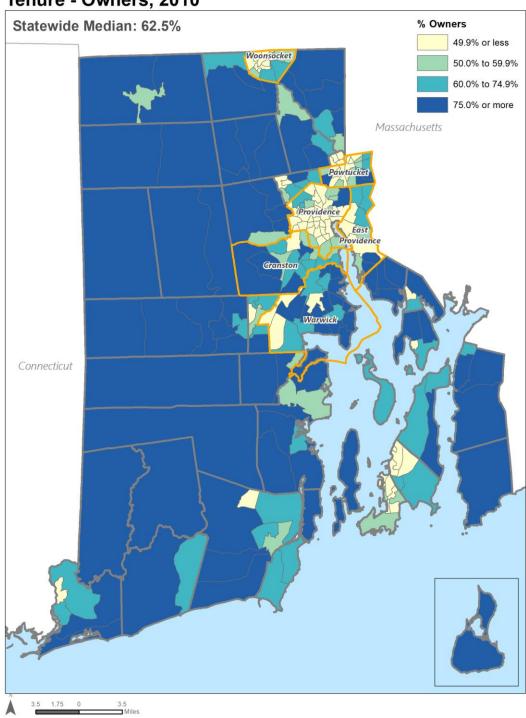


Figure 57 Tenure by Race/Ethnicity in Woonsocket, 2010 - 2017

In 2010, the median homeownership rate at the census tract level was 62.5%, which dropped to 60.0% in 2017. Homeownership rates were lowest in urban areas such as Providence, Pawtucket, and Woonsocket while highest in more rural areas. This geographic pattern remained largely the same between 2010 and 2017.

Map 13 Homeownership Rate, 2010

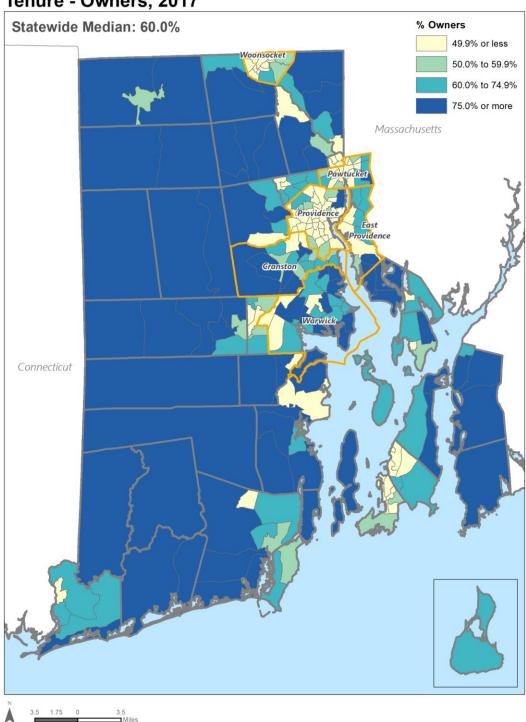
Tenure - Owners, 2010



Source: Census 2010

Map 14 Homeownership Rate, 2017

Tenure - Owners, 2017



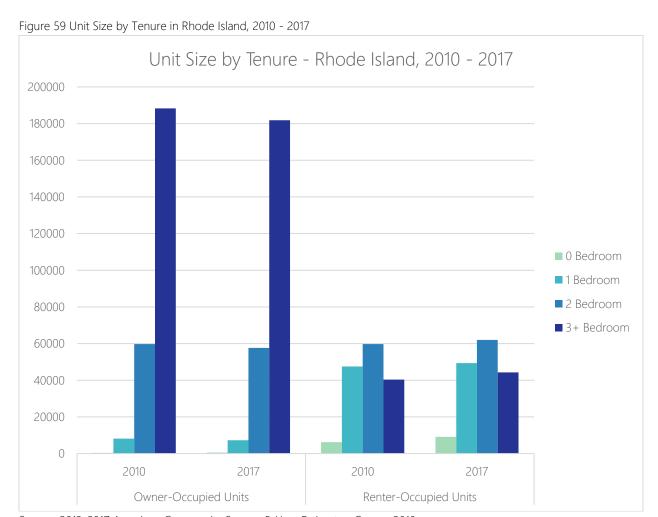
Household size by race/ethnicity and unit sizes

Non-White households tend to be larger than White households at both the State level and in the Entitlements. This means that non-White households will need larger units to avoid over-crowding. However, larger units are typically more costly than smaller units and, in general, non-White households tend to have lower incomes.

In addition, non-White households are disproportionately represented in the rental market, yet the vast majority of rental units have less than three bedrooms. Only 17.6% of the rental inventory in 2010 consisted of three- or more bedroom units which increased slightly to 19.6% in 2017. This issue may be more prevalent in Cranston, East Providence, Warwick, and areas outside of the Entitlements, which have an even lower proportion of their rental inventory comprised of three or more bedrooms than the entire State. To the extent that affordable housing is linked to fair housing, members of the protected classes tend to have more limited housing choice.

Household Size by Race/Ethnicity - Rhode Island, 2017 30.00% 25.00% ■ 3 person 20.00% ■ 4 person 15.00% ■ 5 person 10.00% ■ 6 person ■ 7+ person 5.00% 0.00% White Black Other race Hispanic

Figure 58. Household Sie by Race/Ethnicity in Rhode Island, 2017



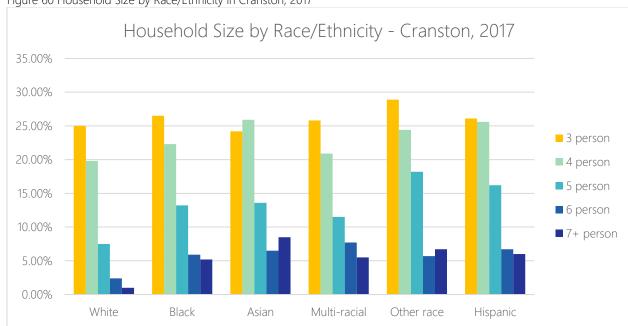


Figure 60 Household Size by Race/Ethnicity in Cranston, 2017

Source: 2013-2017 American Community Survey, 5-Year Estimates

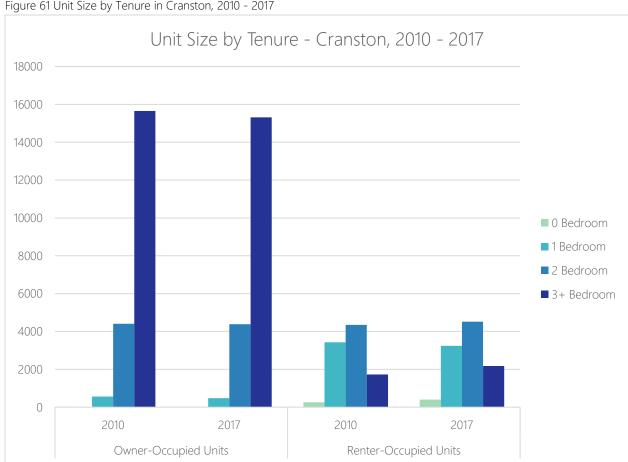


Figure 61 Unit Size by Tenure in Cranston, 2010 - 2017

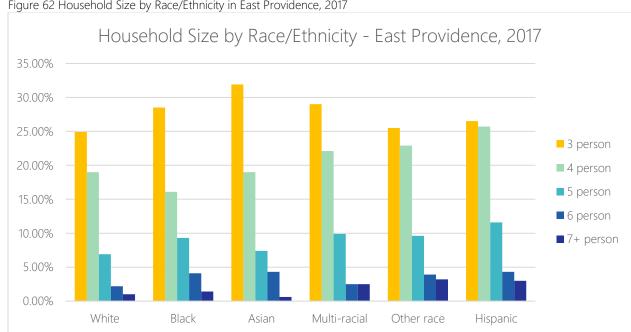
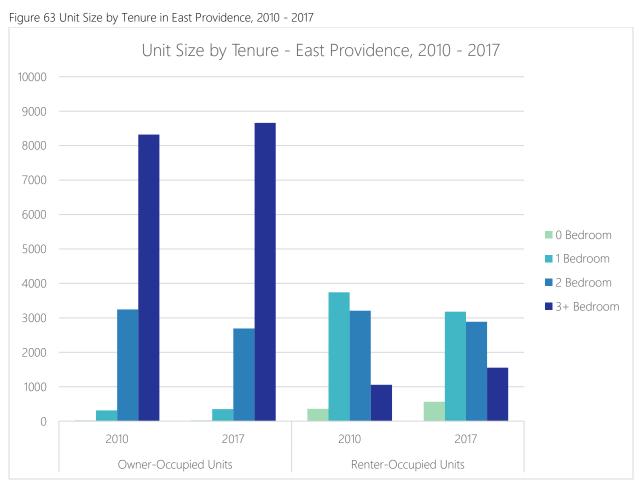


Figure 62 Household Size by Race/Ethnicity in East Providence, 2017



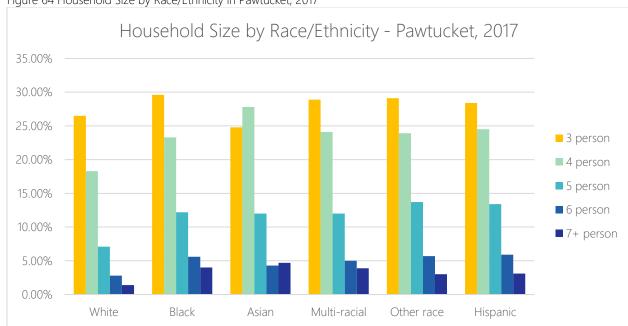
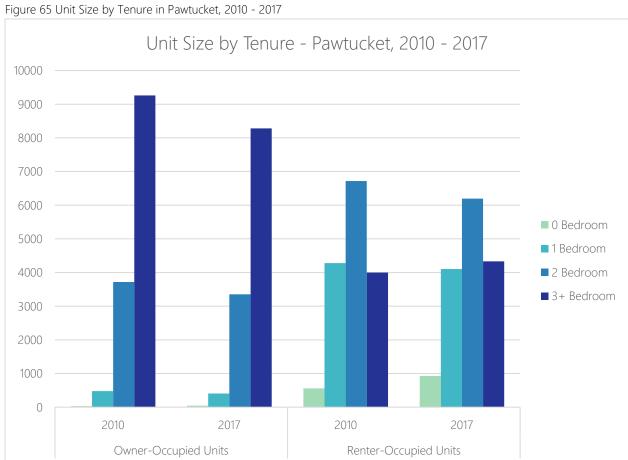


Figure 64 Household Size by Race/Ethnicity in Pawtucket, 2017

Source: 2013-2017 American Community Survey, 5-Year Estimates



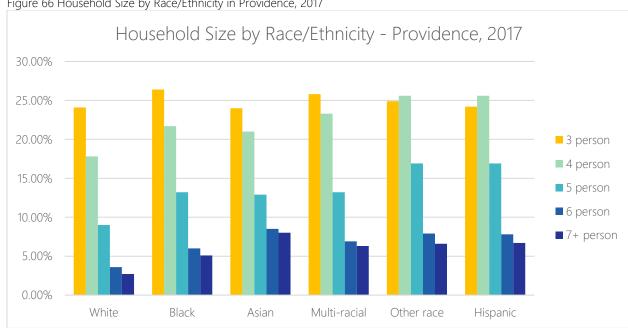


Figure 66 Household Size by Race/Ethnicity in Providence, 2017

Source: 2013-2017 American Community Survey, 5-Year Estimates

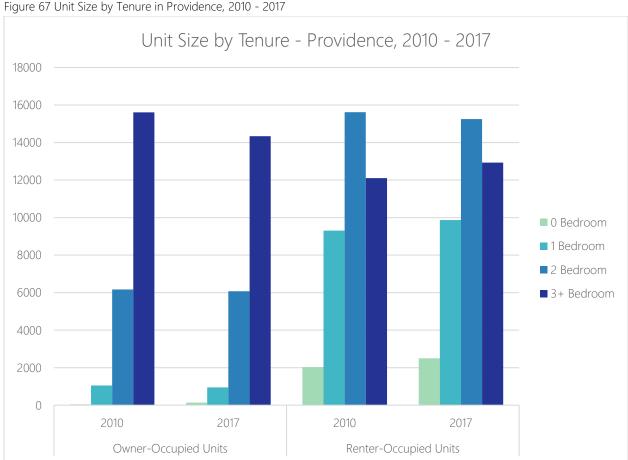


Figure 67 Unit Size by Tenure in Providence, 2010 - 2017

Household Size by Race/Ethnicity - Warwick, 2017 35.00% 30.00% 25.00% ■ 3 person 20.00% ■ 4 person ■ 5 person 15.00% ■ 6 person 10.00% ■ 7+ person 5.00% 0.00% White Black Asian Multi-racial Other race Hispanic

Figure 68 Household Size by Race/Ethnicity in Warwick, 2017

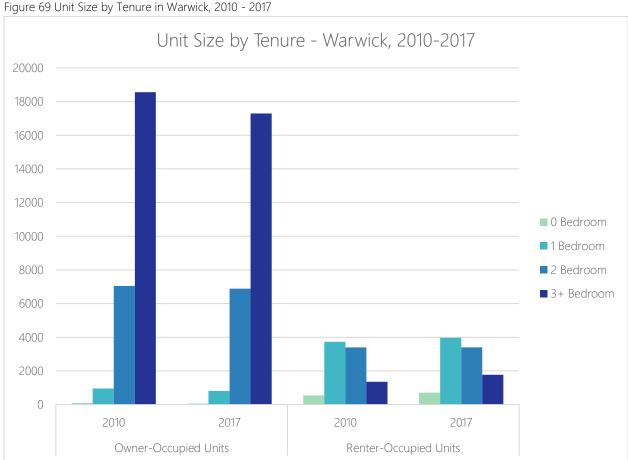


Figure 69 Unit Size by Tenure in Warwick, 2010 - 2017

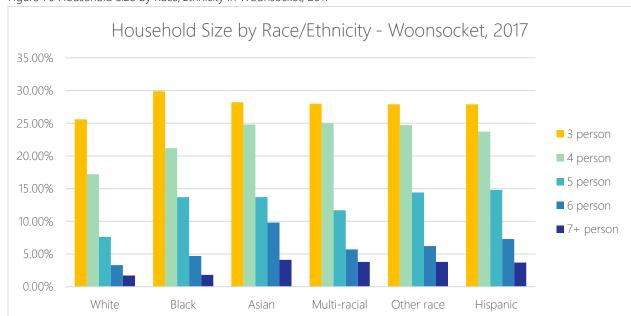
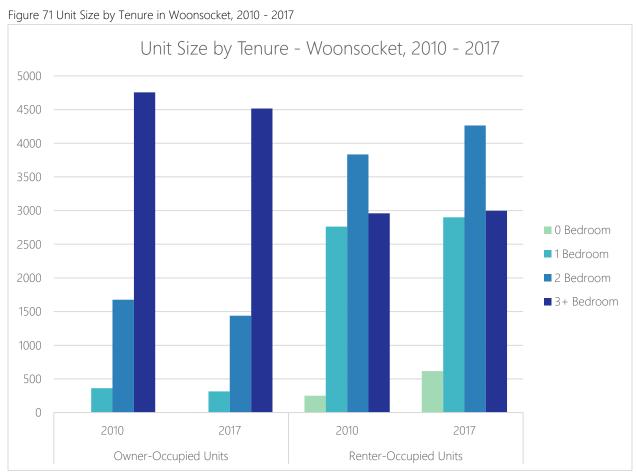


Figure 70 Household Size by Race/Ethnicity in Woonsocket, 2017



Changes in household income relative to housing costs

Between 2010 and 2017, household incomes at the State level have stagnated; when adjusted for inflation, household incomes fell slightly by 1.1%. Median home values and gross rent have also decreased, with a significant decrease of 22.9% in home values and a slight decrease of 3.5% in gross rent (rent plus utilities).

Housing value in the Entitlements is relatively similar to that of the State, decreasing slightly more in all Entitlement communities. Median gross rents in the Entitlements have mostly decreased or stagnated, with East Providence showing the largest rise of 3.7% between 2010 and 2017. However, fluctuations in median household income greatly differ not only from the State but also between Entitlements. Cranston, East Providence, Pawtucket, and Providence had increases in median household income ranging between 8.2% and 21.1%. On the other hand, Warwick and Woonsocket experienced large decreases between 2010 and 2017 by 39.6% and 11.7%, respectively. This is further exacerbated by rising selected monthly owner costs, with the sharpest increases found in the Entitlements.



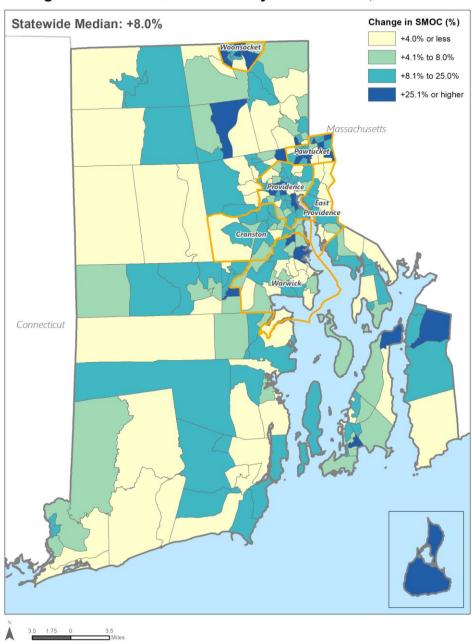
Figure 72 Median House Value and Median Household Income, 2010 – 2017 (adj. to 2017 dollars)



Figure 73 Median Gross Rent, 2010 – 2017 (adj. to 2017 dollars)

Map 15 Change in Median Selected Monthly Owner Costs¹, 2010 – 2017

Change in Median Selected Monthly Owner Costs, 2010-2017



¹ Selected monthly owner costs are calculated from the sum of payment for mortgages, real estate taxes, various insurances, utilities, fuels, mobile home costs, and condominium fees.

Segregation/Integration

Overview of the Analysis

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Latent factors, such as attitudes, or overt factors, such as real estate practices, can limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community may create other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

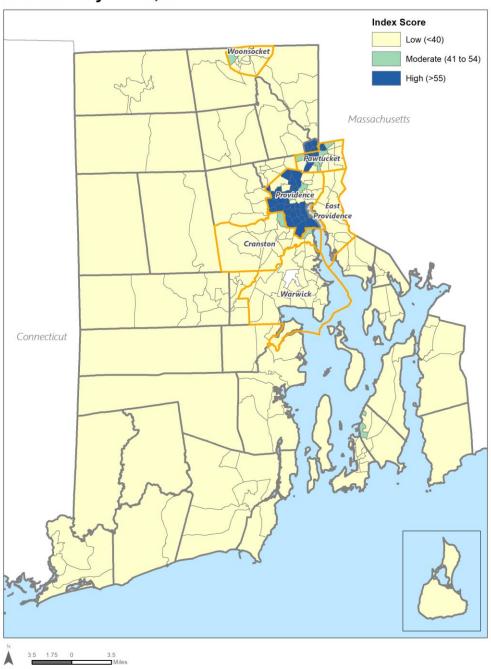
Segregation can be measured using a statistical tool called the dissimilarity index.² This index measures the degree of separation between racial or ethnic groups living in a community. Since White residents are the majority in Rhode Island, all other racial and ethnic groups were compared to the White population as a baseline. Dissimilarly index scores were determined for each county for Black, Asian and Hispanic populations as well as an aggregated index comparing the non-White population with the White population.

The index of dissimilarity allows for comparisons between subpopulations (i.e. different races/ethnicities), indicating how much one group is spatially separated from another within a community. In other words, it measures the evenness with which two groups are distributed across the neighborhoods that make up a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation. According to HUD, a score under 40 is considered low, between 40 and 54 is moderate, and above 60 is high segregation.

Dissimilarity Index trends

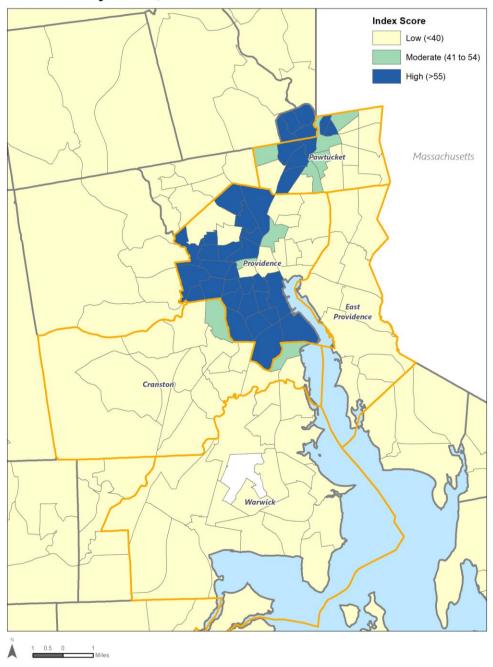
In general, the level of segregation in Rhode Island was low with the most segregated areas concentrated in Providence and Pawtucket. By 2017, segregation had slightly increased and the previous trends between Providence, Pawtucket and the rest of the State remained the same. Areas where segregation increased the most include Pawtucket, the census tracts near Providence's boundary line, and West Greenwich. However, areas showing marked decreases in segregation are concentrated near the center of Providence, where segregation was previously shown to be high.

² For a given geographic area, the index is equal to [(a/A) * (a/t)], where "a" is the group population of a sub-region, "t" is the population of all groups in the sub-region, and "A" is the total group population in the larger region.

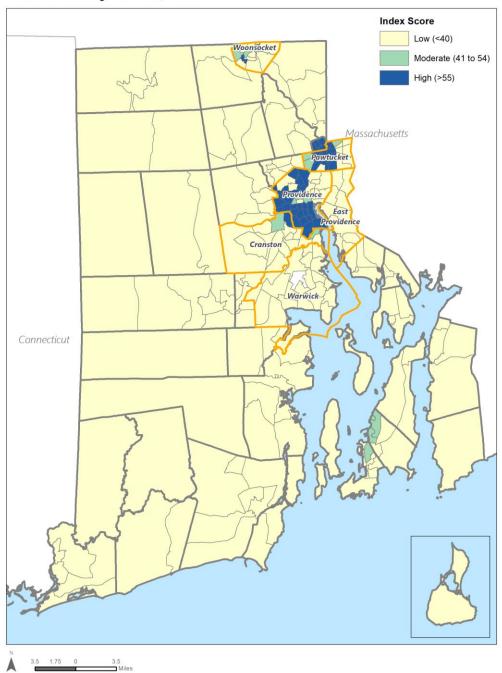


Source: Census 2010; calculations by Mullin & Lonergan Associates, Inc.

Map 17 Dissimilarity Index around the Providence Metro Area, 2010

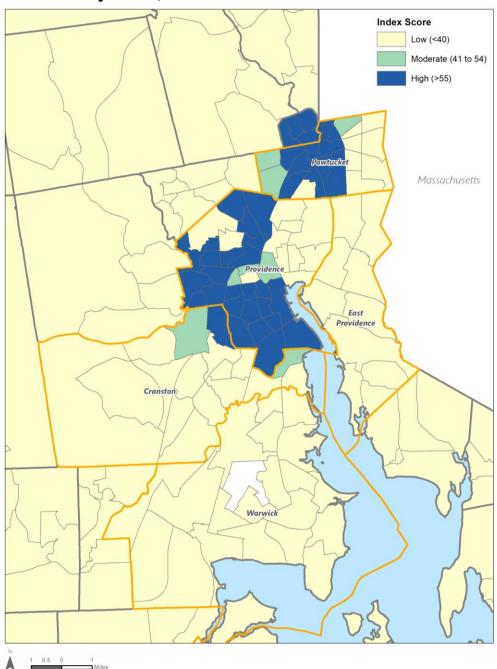


Source: Census 2010; calculations by Mullin & Lonergan Associates, Inc.



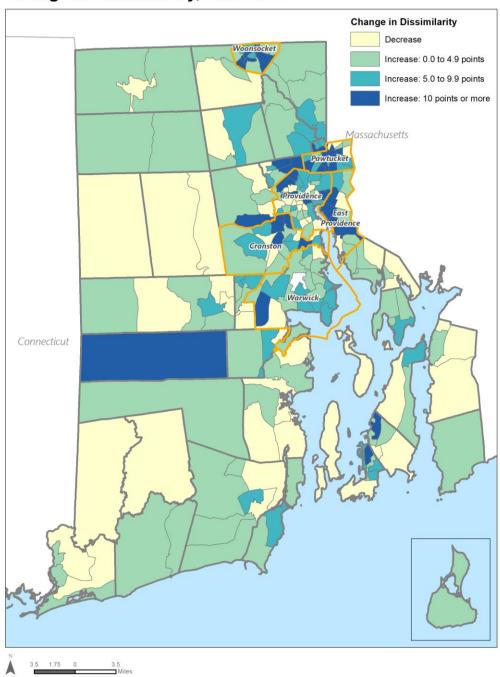
Source: 2013-2017 American Community Survey, 5-Year Estimates; calculations by Mullin & Lonergan Associates, Inc.

Map 19 Dissimilarity Index around the Metro, 2017



Source: 2013-2017 American Community Survey, 5-Year Estimates; calculations by Mullin & Lonergan Associates, Inc.

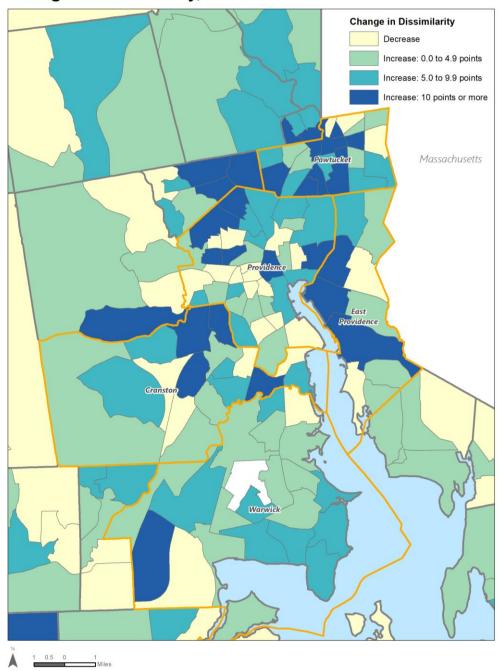
Change in Dissimilarity, 2010-2017



Source: 2013-2017 American Community Survey, 5-Year Estimates; Census 2010 calculations by Mullin & Lonergan Associates, Inc.

Map 21 Change in Dissimilarity around the Providence Metro Area, 2010 to 2017

Change in Dissimilarity, 2010-2017



Source: 2013-2017 American Community Survey, 5-Year Estimates; Census 2010; calculations by Mullin & Lonergan Associates, Inc.

Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

Overview of analysis

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 racial/ethnic minorities.

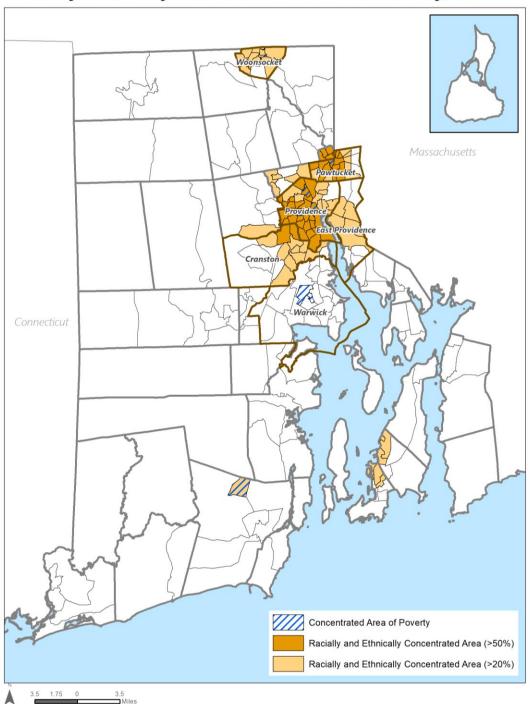
Identification of R/ECAPs

Using the HUD definition of R/ECAPs, there are seven census tracts that meet these requirements. Most of the R/ECAPs are located in urban areas, such as Providence, Woonsocket, and Pawtucket. The R/ECAP in South Kingstown is the only R/ECAP not located in an Entitlement and can likely be explained by the presence of the University of Rhode Island's large student population in this relatively small census tract. There are also census tracts around these three Entitlements that meet the racial and ethnic requirement but do not meet the poverty requirement. Conversely, the central part of Warwick meets the poverty requirement but not the racial and ethnic requirement.

Figure 74 R/ECAP Census Tracts, 2017

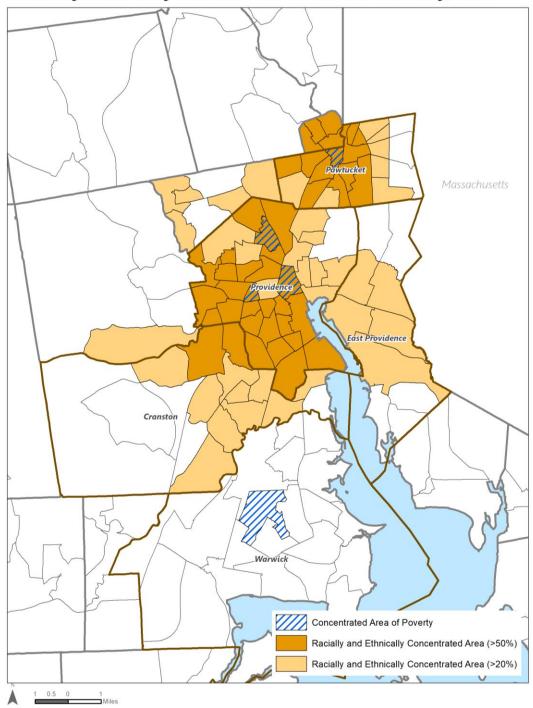
· ·	•		
Census Tract	County Subdivision	Non-White	Poverty Rate
514	South Kingstown	22.1%	53.2%
183	Woonsocket	43.7%	41.0%
152	Pawtucket	76.2%	49.2%
178	Woonsocket	34.3%	40.7%
8	Providence	53.2%	42.6%
10	Providence	53.3%	40.6%
27	Providence	71.5%	41.9%

Racially/Ethnically Concentrated Areas of Poverty, 2017



Source: Source: 2013-2017 American Community Survey, 5-Year Estimates; calculations by Mullin & Lonergan Associates, Inc

Racially/Ethnically Concentrated Areas of Poverty, 2017



Source: Source: 2013-2017 American Community Survey, 5-Year Estimates; calculations by Mullin & Lonergan Associates, Inc

Housing Stock Characteristics

Physical Characteristics of the Housing Stock

Age of Housing Stock

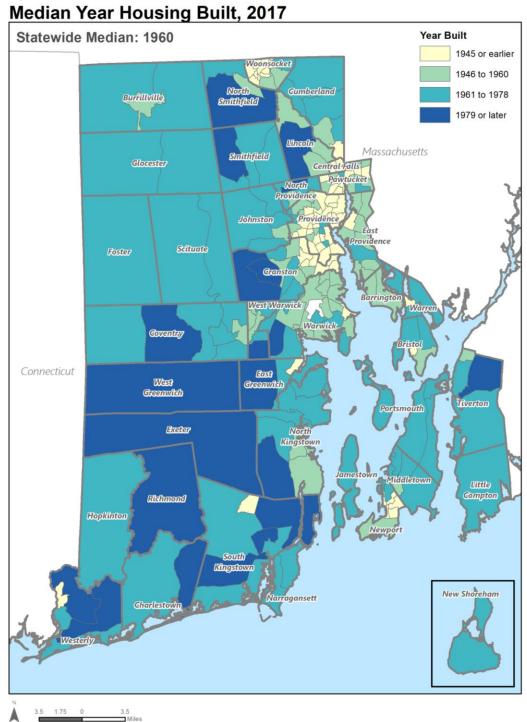
Many homes in Rhode Island were built in the 1940s and earlier, especially in urban areas; all Entitlement communities have generally older housing stock than the rest of the State. Older homes typically need mechanical system and energy efficiency upgrades, which may not be financially feasible, particularly among low- and moderate-income households. 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.

Another significant concern is the presence of lead-based paint. In 1978, the federal government banned the use of lead-based paint in homes after studies showed that lead caused severe health problems, particularly among children under the age of six. The nervous systems of children could even be damaged before birth. Although lead-based paint is no longer on the market, many older homes still have lead-based paint on the walls and trim. Scraping paint and sanding old paint can release dust containing lead that, when inhaled, can be harmful. With the median year of structures built throughout the entire State being 1960, the majority of households in Rhode Island is at-risk of lead-based paint hazard exposure.

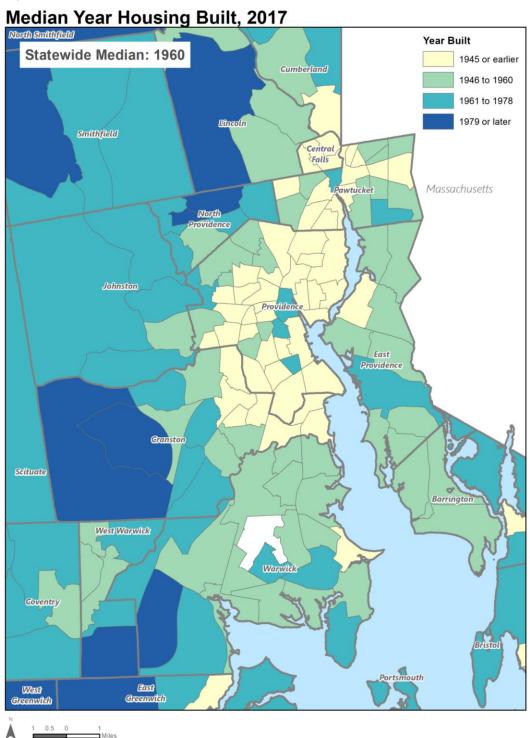
Figure 75 Median Year Structure Built, 2017

,				
	Median Year Built			
Rhode Island	1960			
Cranston	1957			
East Providence	1956			
Pawtucket	1946			
Providence	pre-1939			
Warwick	1959			
Woonsocket	pre-1939			

Map 24 Median Year Structures Built, 2017



Map 25 Median Year Structures Built around Providence, 2017



Vacancy rates

Vacancy rates come from the American Community Survey, which defines vacancy rate as the ratio of vacant available units to total units.

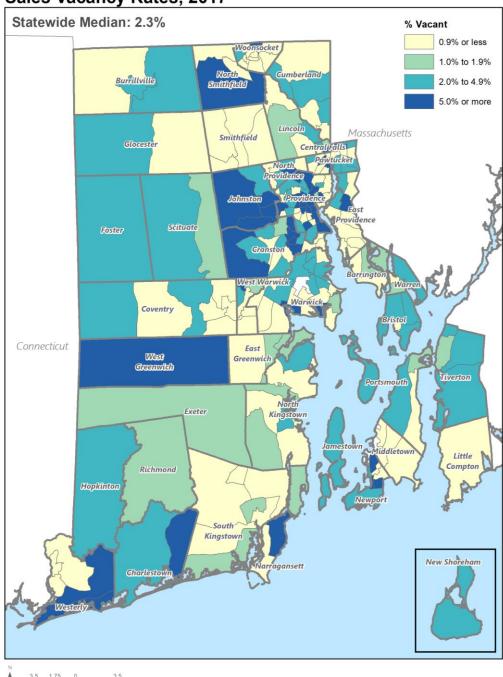
Homeowner vacancy rates in Rhode Island sit near the national average at 1.8%, indicative of a tight sales market. Homeowner vacancy is the ratio of vacant available for-sale and sold housing units to the total number of vacant and owner-occupied housing units. Providence and Cranston show above-average homeowner vacancy rates compared to the State and the other Entitlement communities.

Like homeowner vacancies, rental vacancies are the ratio of vacant available for-rent and rented unoccupied units to the total number of vacant available and rental-occupied housing units. Rental vacancy rates are higher than homeowner vacancy rates at 5.8%. The highest rates are found in Providence and Woonsocket while Warwick has very low renter-occupied vacancies. Given the high concentration of renters in these areas, this trend may indicate there are barriers inhibiting access to rental properties. Rental vacancy rates are generally low outside of the Entitlement communities.

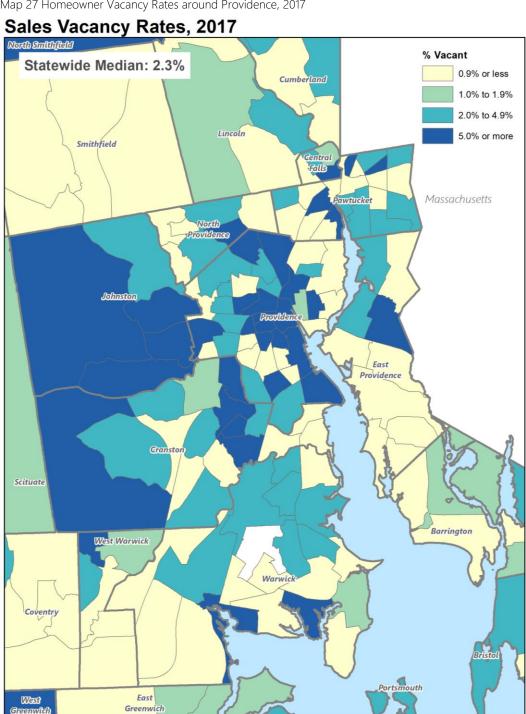
Figure 76 Vacancy rate by tenure, 2017

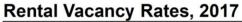
	Vacancy Rates, 2017			
	Owner-occupied	Renter-occupied		
Rhode Island	1.8%	5.8%		
Cranston	3.3%	5.7%		
East Providence	1.2%	4.5%		
Pawtucket	1.2%	4.7%		
Providence	3.1%	7.6%		
Warwick	1.4%	3.0%		
Woonsocket	1.2%	7.9%		
Remainder of State	1.5%	5.2%		

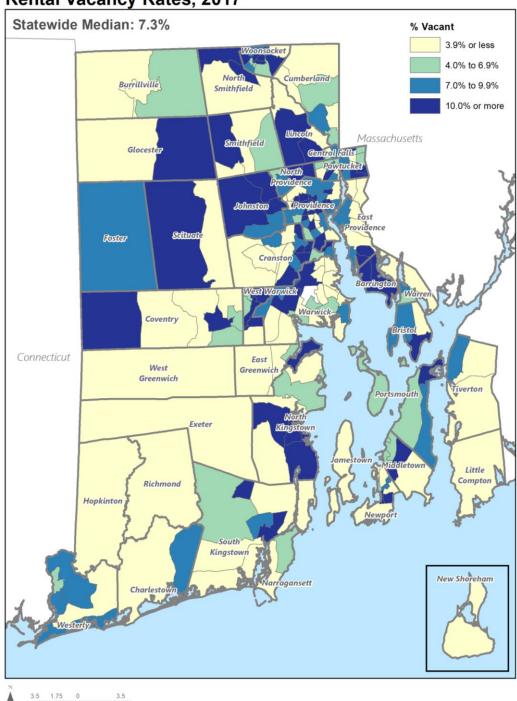
Sales Vacancy Rates, 2017



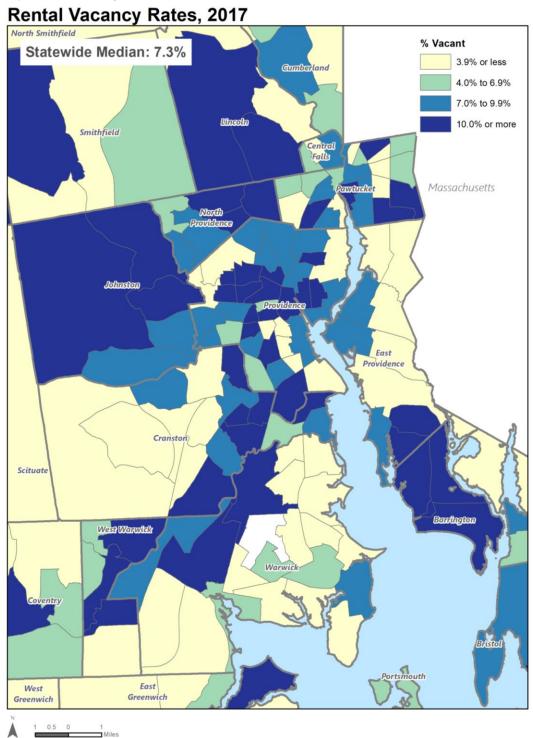
Map 27 Homeowner Vacancy Rates around Providence, 2017







Map 29 Rental Vacancy Rates around Providence



Housing Conditions

A Housing Conditions Model was created as part of the 2019 State of Housing in Rhode Island (SHRI) to estimate housing conditions across the State at the census tract level. Substandard housing can result in poor health outcomes and quality of life on an individual level and can inhibit economic development and job growth at the community scale. The following three variables were weighted equally and used in the model: median home value, housing age and cost burden.

Median Home Value

Home values are often used as a proxy for other non-market goods affecting quality of life, such as accessibility to public transit and green space, growth potential in terms of population and development, quality of schools, and more. The median home value in Rhode Island in 2017 was \$242,000, more than 25% greater than the national median home value of \$193,500. However, home values declined across Rhode Island between 2010 and 2017 by 22.6%. Home values in the Entitlement communities are generally lower and showed greater decline between 2010 and 2017 than the rest of the State.

Figure 77 Median Home Value, 2010-2017

	Median Home Value				
		2010 (adj. to 2017\$)		2017	% Change
Rhode Island	\$	313,009	\$	242,200	-22.6%
Cranston	\$	290,147	\$	219,900	-24.2%
East Providence	\$	274,233	\$	208,000	-24.2%
Pawtucket	\$	255,966	\$	172,200	-32.7%
Providence	\$	273,000	\$	181,100	-33.7%
Warwick	\$	262,578	\$	199,000	-24.2%
Woonsocket	\$	254,845	\$	158,500	-37.8%

Source: 2013-2017 American Community Survey, 5-Year Estimates

Housing Age

An aging housing stock is of 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 1960. Older homes are more likely to contain environmental health hazards, such as lead in pre-1978 homes, and lack accessibility features for elderly persons and persons with disabilities. Additionally, lower income households are more likely to live in older homes, leading to disproportionate adverse health outcomes in these communities. Given the Entitlement communities have structures with a median construction year of 1945 compared to 1975 outside of these areas, the model implies that urban areas would have lower quality housing.

Cost Burden

Cost burdened households are defined by HUD as households spending more than 30% of their annual income on housing costs. Severely cost burdened households spend more than 50% of their income. Independent from median income, cost burden serves as an indicator of a homeowner's ability to afford property maintenance and improvements. Urban areas tend to have a higher percentage of cost-burdened homeowners and renters, decreasing their score in the Housing Conditions Model. As a state, Rhode Island renters are more cost-burdened (44.9%) than homeowners (28.5%). Areas with the highest concentration of cost-burdened homeowners tend to also have the most cost-burdened renters. These areas include Providence and the coastal cities. Among the Entitlement communities, the highest rates of cost-burdened households were located in Providence (43.8%) and Woonsocket (40.3%). These areas, along with Pawtucket, also had above-average rates of cost-burdened homeowners. Providence was the only Entitlement to have above-average rates of renter cost-burden, indicating general affordable housing issues.

Figure 78 Cost-burden by Tenure, 2015

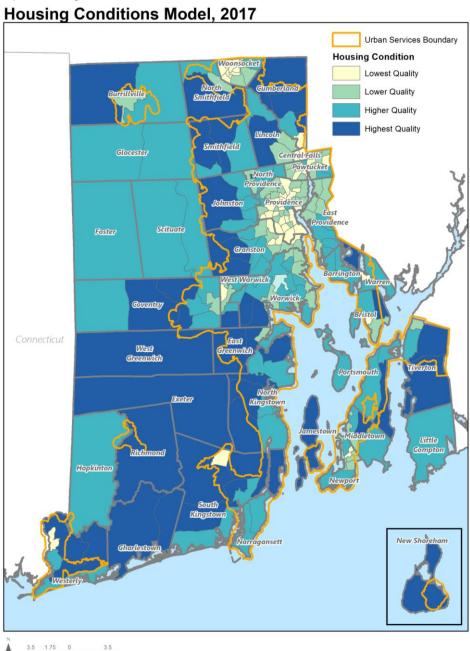
	% Cost-burdened Households	% Cost-burdened Homeowners	% Cost-burdened Renters
Rhode Island	35.1%	28.5%	44.9%
Cranston	35.8%	31.4%	44.5%
East Providence	33.7%	28.6%	40.7%
Pawtucket	39.1%	35.6%	41.7%
Providence	43.8%	35.0%	48.2%
Warwick	32.2%	28.1%	42.1%
Woonsocket	40.3%	34.2%	44.0%

Source: 2011-2015 CHAS

Summary

The census tracts with units scored as Lowest and Lower Quality are largely in and around Providence with a few other census tracts near Bristol, Westerly, Warwick, Burrillville, and Woonsocket. Census tracts with housing units scored as Higher and Highest Quality are outside of urban areas in the northern, western and coastal regions.

Map 30 Housing Conditions



Source: 2013-2017 American Community Survey, 5-Year Estimates; calculations by Mullin & Lonergan Associates, Inc.

Map 31 Housing Conditions around Providence Housing Conditions Model, 2017 **Housing Condition** Lowest Quality **Cumberland** Lower Quality Higher Quality Highest Quality Smithfield Central Falls awtucket Massachusetts North Providence East Providence Granston West Warwick

Source: 2013-2017 American Community Survey, 5-Year Estimates; calculations by Mullin & Lonergan Associates, Inc.

East Greenwich

Housing Affordability

Financial Characteristics of the Housing Stock

Median Contract/Gross Rent

Median gross rent (includes utilities with rent) in Rhode Island was \$957 as of 2017, a 3.1% decline from \$991 in 2010, adjusted for inflation to 2017 dollars. Contract rent (includes only rent) also slightly declined from \$839 in 2010 to \$820 in 2017. Trends between contract and gross rent were consistent across geographies.

Rents were the highest and showed the sharpest rises between 2010 and 2017 in areas outside of the Entitlements, increasing by 4.8% and 10.8% for gross and contract rent, respectively. The Newport area showed especially high increases. Of the Entitlement communities, only East Providence saw above-average growth in both gross and contract rent. Declines in rent were greatest in Providence and Cranston. The following maps illustrate median gross rent and median contract rent in 2010 and 2017 along with the percent change between these years. Areas in white did not have data available.

Figure 79 Median Gross Rent, 2010-2017

	Median Gross Rent				
	2010		2017		% Change
Rhode Island	\$	991	\$	957	-3.5%
Cranston	\$ 1,0	059	\$	998	-5.8%
East Providence	\$ 8	895	\$	928	3.7%
Pawtucket	\$ 8	899	\$	878	-2.4%
Providence	\$ 1,	,013	\$	949	-6.3%
Warwick	\$ 1,0	099	\$	1,101	0.1%
Woonsocket	\$ 8	844	\$	848	0.4%

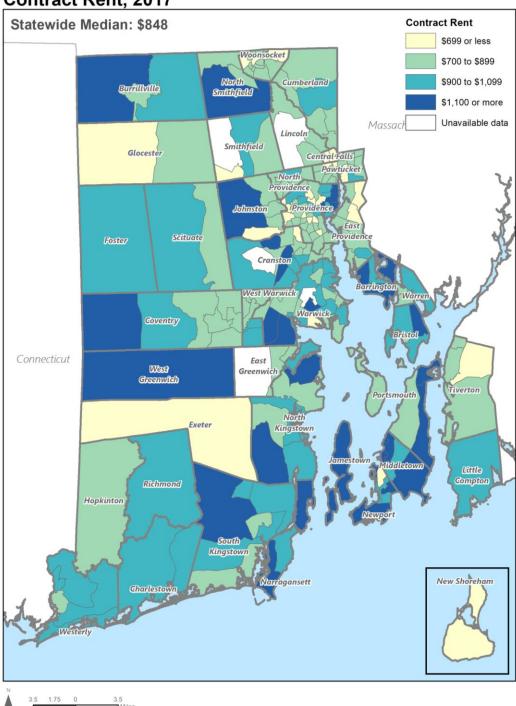
Source: 2013-2017 American Community Survey, 5-Year Estimates; Census 2010

Figure 80 Median Contract Rent, 2010-2017

	Median Contract Rent				
	2010		2	2017	% Change
Rhode Island	\$	839	\$	820	-2.3%
Cranston	\$	914	\$	862	-5.7%
East Providence	\$	802	\$	822	2.5%
Pawtucket	\$	769	\$	742	-3.6%
Providence	\$	833	\$	778	-6.6%
Warwick	\$	1,010	\$	983	-2.7%
Woonsocket	\$	699	\$	715	2.3%

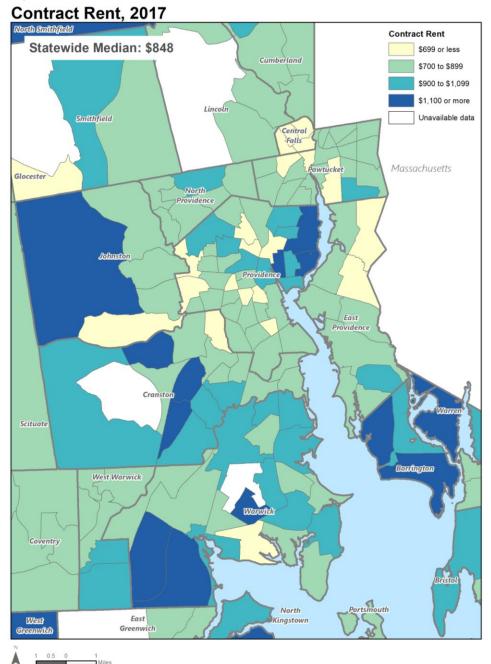
Source: 2013-2017 American Community Survey, 5-Year Estimates; Census 2010

Contract Rent, 2017

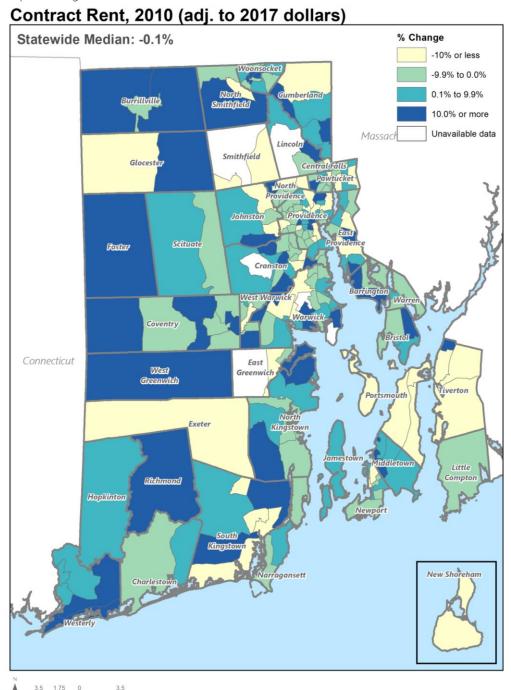


Source: 2013-2017 American Community Survey, 5-Year Estimates

Map 33 Median Contract Rent around Providence, 2017



Source: 2013-2017 American Community Survey, 5-Year Estimates



Source: 2013-2017 American Community Survey, 5-Year Estimates; calculations by Mullin & Lonergan Associates, Inc.

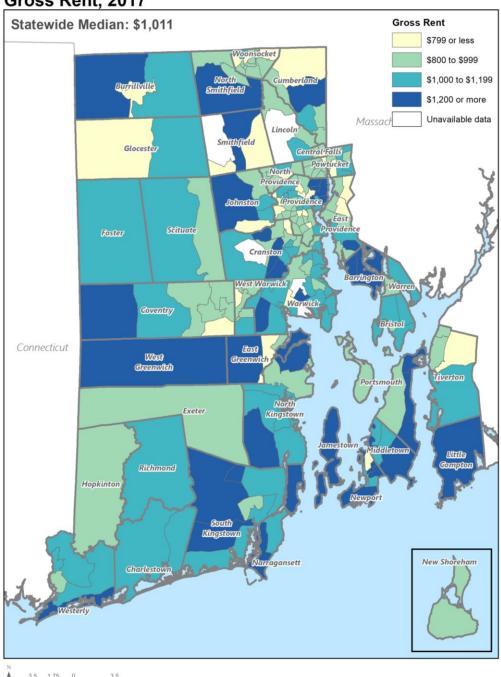
Change in Contract Rent, 2010 - 2017 (adj. to 2017 dollars) Statewide Median: -0.1% -10% or less Gumberland -9.9% to 0.0% 0.1% to 9.9% 10.0% or more Lincoln Unavailable data Smithfield awtucket Massachusetts Glocester North Providence Johnsto East)
Providence Cranston Scituate Barrington West Warwick

Map 35 Change in Contract around Providence, 2010 to 2017

Source: 2013-2017 American Community Survey, 5-Year Estimates; calculations by Mullin & Lonergan Associates, Inc.

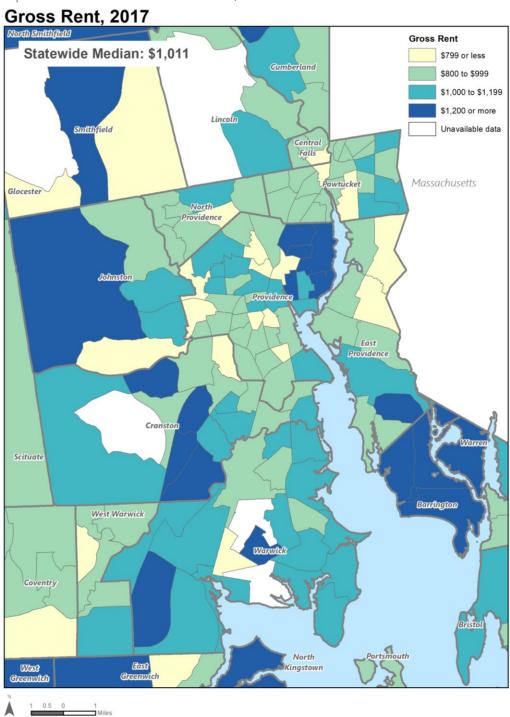
East Greenwich

Gross Rent, 2017

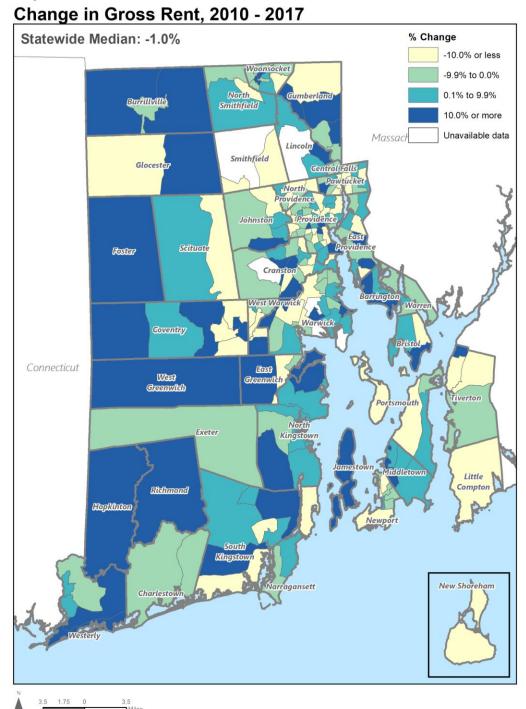


Source: 2013 – 2017 American Community Survey

Map 37 Median Gross Rent around Providence, 2017

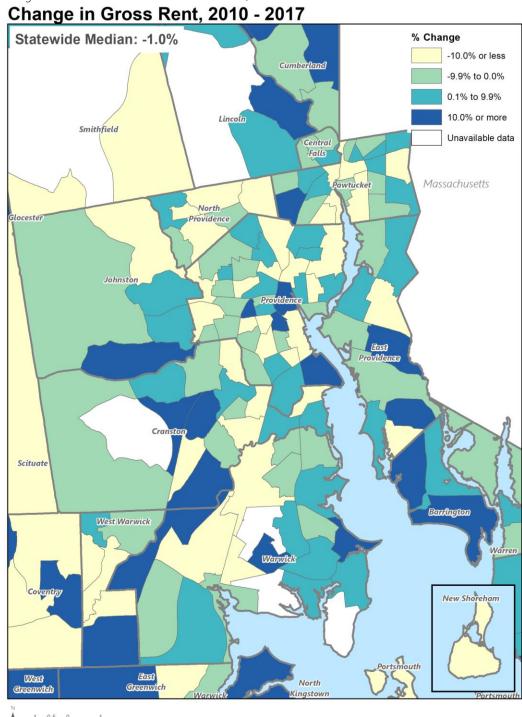


Source: 2013-2017 American Community Survey, 5-Year Estimates



Source: 2013-2017 American Community Survey, 5-Year Estimates; Census 2010; calculations by Mullin & Lonergan Associates, Inc.

Map 39 Change in Median Gross Rent around Providence, 2010 to 2017



Source: 2013-2017 American Community Survey, 5-Year Estimates; Census 2010 calculations by Mullin & Lonergan Associates, Inc.

Financial Characteristics of Occupants

Median Income

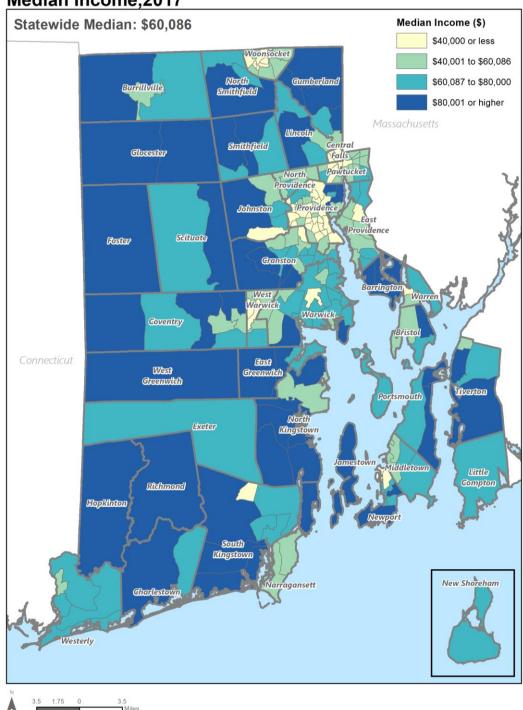
The median income across Rhode Island was \$61,043 in 2017. Income underwent minimal changes between 2010 and 2017, experiencing a slight decline of 1.1% after adjusting for inflation. Most Entitlements had similar declines, with Warwick and Woonsocket standing out. Warwick was the only Entitlement to see growth in median income between 2010 and 2017, by 6.5%. Additionally, Warwick already had the highest median income and rents out of the Entitlements. Conversely, Woonsocket had a relatively large decline in median income by 11.7% between 2010 and 2017 and the lowest home values. Areas outside of the Entitlement communities generally had higher levels of income but varying growth rates with no discerning geographic pattern.

Figure 81 Median Income, 2010-2017

	Median Income					
	(2010 (adj. to 2017\$)	2017		% Change	
Rhode Island	\$	61,699	\$	61,043	-1.1%	
Cranston	\$	65,093	\$	64,282	-1.2%	
East Providence	\$	56,548	\$	54,707	-3.3%	
Pawtucket	\$	45,174	\$	44,909	-0.6%	
Providence	\$	41,496	\$	40,366	-2.7%	
Warwick	\$	66,863	\$	71,191	6.5%	
Woonsocket	\$	43,407	\$	38,340	-11.7%	

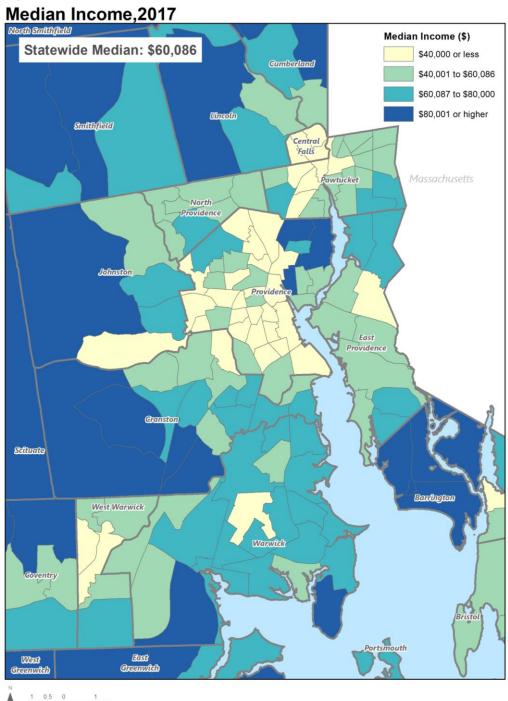
Source: 2013-2017 American Community Survey, 5-Year Estimates; Census 2010; calculations by Mullin & Lonergan Associates, Inc.

Median Income,2017

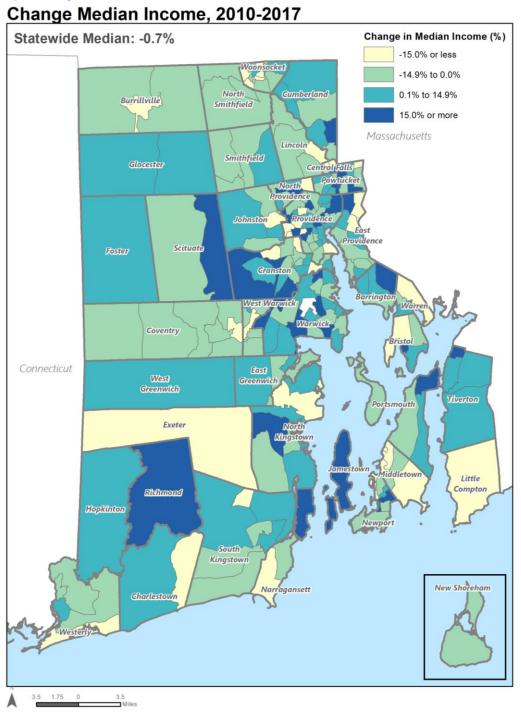


Source: 2013-2017 American Community Survey, 5-Year Estimates

Map 41 Median Income around Providence, 2017

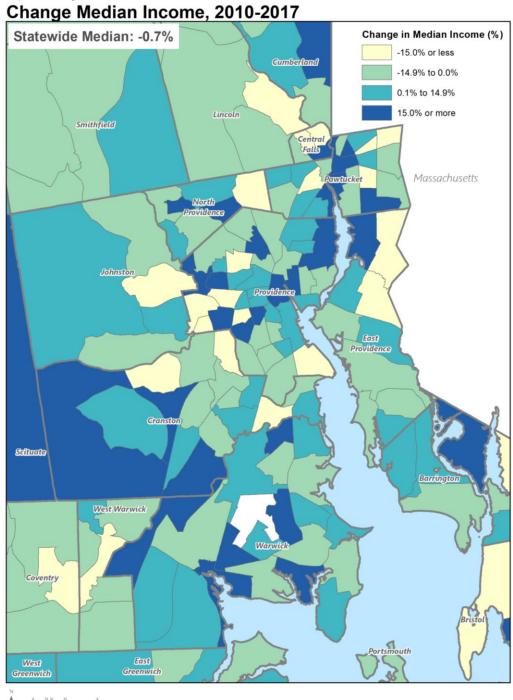


Source: 2013-2017 American Community Survey, 5-Year Estimates



Source: 2013-2017 American Community Survey, 5-Year Estimates; Census 2010; calculations by Mullin & Lonergan Associates, Inc.

Map 43 Change in Median Income around Providence, 2010 to 2017



Source: 2013-2017 American Community Survey, 5-Year Estimates; Census 2010; calculations by Mullin & Lonergan Associates, Inc.

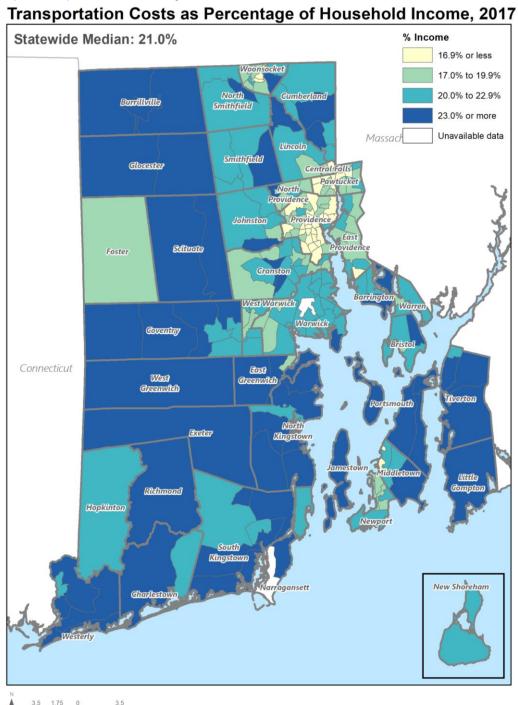
Transportation Costs

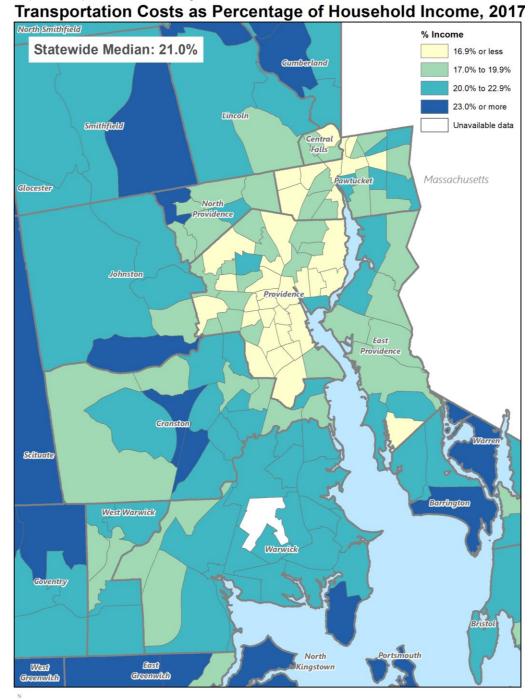
For moderate-income households (80% AM), Rhode Island households typically spent 21% of their income on transit. Providence and Pawtucket saw the lowest transportation cost burdens, likely due to their urbanized nature. Areas outside of the Entitlements tend to have higher transportation costs as a percentage of income. Low transportation costs correlated with higher number of trips taken via public transit, with Providence and Pawtucket taking almost twice as many transit trips per year compared to the other Entitlements.

Figure 82 Transit Use for Moderate-Income Households (80% AMI)

	Transportation Costs as % of Income	Average Annual Transit Trips
Cranston	23.0%	70
East Providence	22.0%	70
Pawtucket	20.0%	125
Providence	19.0%	140
Warwick	24.0%	63
Woonsocket	21.0%	65

Map 44 Transportation as Percentage of Income, 2017





Map 45 Transportation as Percentage of Income around Providence, 2017

5. Areas of Opportunity

A large body of social research has demonstrated the powerful negative effects of residential segregation on income and opportunity for minority families, which are commonly concentrated in communities "characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools." Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment. The rationale for this analysis is to help communities determine where to invest housing resources by pinpointing the areas of greatest existing need. However, current evidence suggests that adding more subsidized housing to places that already have a high concentration of social and economic issues (i.e. R/ECAPs) could be counter-productive and not meet the spirit of the goals of HUD programs. This does not mean, however, that R/ECAPs should be ignored by communities. Residents in R/ECAPs still need services and high-quality places to live and stabilizing and improving conditions in the lowest-income neighborhoods remains a key priority for Rhode Island and the Entitlements. Rather, investment should be balanced between existing R/ECAPs (improving the quality of life for residents who want to remain in their neighborhoods) and other communities that offer opportunities and advantages for families and individuals.

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues and are also based on research that validates the connections between the indicators and increased opportunity. The resulting maps allow communities to analyze opportunity, comprehensively and comparatively, to communicate who has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities. The combination of identifying R/ECAPs and Communities of Opportunity creates a holistic approach to community investment.

An Opportunity Index was developed to classify and visualize areas of opportunity for Rhode Island residents. The Opportunity Index identifies areas in which new affordable housing developments may be more financially feasible in the long-term due to proximity to factors that allow residents to have successful access to employment, quality education, and a healthy environment. The data is linearly normalized to values between 0 and 1, after which census tracts are classified as having High Opportunity if they have a score above the median and Low Opportunity if they have a score below the median. The variables and weight for each index are summarized in the table below, followed by a more detailed description of each index

Overall, the lowest opportunity areas are located in the Entitlements of Providence, Pawtucket and East Providence along with Central Falls. Affordable housing options should be considered outside of these areas to avoid concentrating poverty and amplifying the adverse effects of growing up with a lack of access to community assets. Stakeholders supported this idea, citing that too much assisted housing is

concentrated in and around Providence. Stakeholders also mentioned that there are barriers to developing affordable housing options elsewhere, such as a lack of landlords who are willing to accept Housing Choice Vouchers and local opposition from residents in higher opportunity areas. Education and outreach on the importance of affordable and fair housing for all Rhode Islanders should be expanded to improve access to affordable and accessible housing.

Figure 83 Opportunity Indices in Rhode Island Entitlement Communities

	Education	Labor Force Engagement	Environmental Health Index	Transit	Poverty
Cranston*	Higher	Higher	Higher	Higher	Highest
East Providence*	Lower	Lower	Lower	Higher	Higher
Pawtucket	Lower	Lower	Lowest	Highest	Lower
Providence	Lowest	Lowest	Lowest	Highest	Lowest
Warwick	Higher	Higher	Higher	Higher	Higher
Woonsocket	Lowest	Lower	Lower	Higher	Lowest

*It is important to note that in using the median as the breakpoint between "lower" and "higher" opportunity communities to summarize the communities above, nuances available at the census tract level is lost. For communities that fall within the two borderline categories, such as Cranston and East Providence, census tract level analysis is highly recommended. For example, denser areas of Cranston closer to Providence show lower levels of opportunity compared to the area west of I-295. Similarly, the areas of East Providence bordering Barrington show higher levels of opportunity relative to the rest of the city.

There are two major community-based initiatives across Rhode Island that directly address access to opportunity for residents: Health Equity Zones and the Working Cities Challenge, both of which are summarized below. These initiatives can play a critical role in expanding access to community opportunity, and furthering the goals and actions proposed in the Al. Both RIHousing and the OHCD are participating in these initiatives.

In a statewide collaborative, Rhode Island has established a Health Equity Zone initiative—an innovative, place-based approach that brings communities together to build the infrastructure needed to achieve healthy, systemic changes at the local level. Health Equity Zones are geographic areas where existing opportunities emerge and investments are made to address differences in health outcomes. Through a collaborative, community-led process, each Health Equity Zone conducts a needs assessment and implements a data-driven plan of action to address the unique social, economic, and environmental factors that are preventing people from being as healthy as possible.

Launched at an initial 11 sites throughout the State, Rhode Island's Health Equity Zone initiative is showing that a concerted focus on people and place can have an immediate impact at the local level. Within the Entitlements, the following achievements have succeeded:

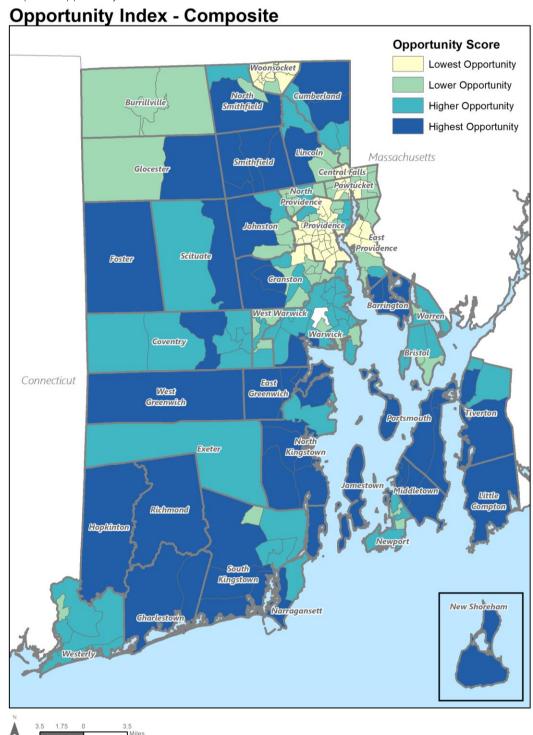
- The Pawtucket and Central Falls Health Equity Zone partnered with the City of Central Falls Planning Department to develop Rhode Island's first Complete and Green Streets ordinance, which is designed to ensure safe access to roadways for users of all ages and abilities and to protect the environment.
- The West Warwick Health Equity Zone embedded a behavioral health clinician within the local police department to divert patients with substance misuse from the criminal justice system and into treatment. The HEZ also partnered with the local high school to equip educators and staff to better address childhood traumatic stress.
- The Woonsocket and Bristol Health Equity Zones opened free community drop-in centers for adults in recovery from substance use disorders.
- The Southside, Elmwood, and West End Health Equity Zone in Providence galvanized residents to advocate for housing as a social determinant of health, achieving the remediation of several blighted properties, hosting a Neighborhood Housing Summit and advancing equitable housing policy.
- The City of Providence Health Equity Zone trained staff of 11 City recreation centers in implementing a Healthy Eating policy, to ensure healthy options and role modeling for City youth in all recreation centers.
- Health Equity Zones in Providence, Newport, West Warwick, Pawtucket, and Central Falls
 partnered to train and deploy trusted community members as community health workers to
 conduct needs assessments, identify safe routes to schools to improve attendance, promote
 recovery services, and build community-clinical linkages.
- To reduce high rates of unintended teen pregnancy, the Woonsocket Health Equity Zone hired a Family Planning/Health Educator who will implement a comprehensive, science-based curriculum at the high school during health class and link teens to the Title X school-based health center and after-school programs.

The Working Cities Challenge is a groundbreaking effort of the Federal Reserve Bank of Boston to support leaders who are reaching across sectors to ensure that smaller cities in Massachusetts and Rhode Island are places of opportunity and prosperity for low-income and residents of color by leading teams in both states through a rigorous process that builds cross-sector collaborations. The Working Cities Challenge pushes cities to tap the wisdom of all sectors to develop transformative partnerships that will bring deep and lasting change. The Challenge was funded by and designed in partnership with the Boston Fed's own network of cross-sector collaborators, which takes the form of a Steering Committee comprised of leaders from the public, private, and philanthropic sectors. The resulting Challenge takes the shape of a competition whereby an independent jury of experts evaluates teams'

applications against criteria that reflect the core elements of the Working Cities Challenge: leading collaboratively across sectors, engaging diverse community members, using evidence to track progress toward a shared goal, and working to improve the lives of low-income and residents of color by changing systems.

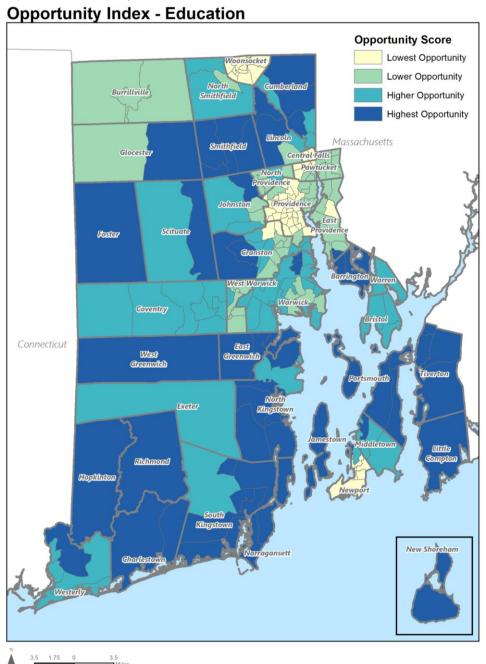
The State of Rhode Island recently began its Working Cities initiative as the next state where the Federal Reserve Bank is expanding the competition. WCC will offer this economic development opportunity to 13 eligible Rhode Island cities, in an effort designed to strengthen cross sector collaboration and leadership in the Ocean State's postindustrial cities. The effort will require City teams to concentrate on issues affecting lower-income residents and people of color and include those constituents in the planning and designing of the initiative.

The Governor's administration in Rhode Island supports Working Cities and has committed matched public funding to the initiative. Living Cities, and other key public and private funders, will provide additional funding for the competition. The Boston Fed continues to build partnerships with public, private and community partners in Rhode Island as it creates specifications that will be required for the Challenge.



School Proficiency Index

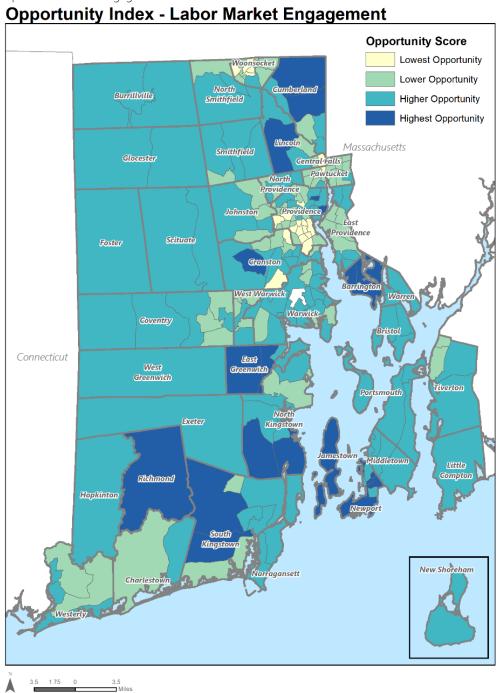
The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The school proficiency index is a function of the percent of 4th grade students proficient in reading and math on state test scores for up to three schools within 1.5 miles of the block group. Scores are assigned to a census tract by taking the average of the block groups. Quality education is critical for the growth and development of children and enhancing their future opportunities. Generally, most of the Entitlement communities were considered to have the lowest school proficiency scores. Newport is also among the lowest school proficiency score followed by Burrillville and Glocester. The rest of the State had higher performing schools, including the Entitlements of Warwick and Cranston.



Source: Great Schools (proficiency data, 2013-14); Common Core of Data (4th grade school addresses and enrollment, 2013-14); Maponics (attendance boundaries, 2016)

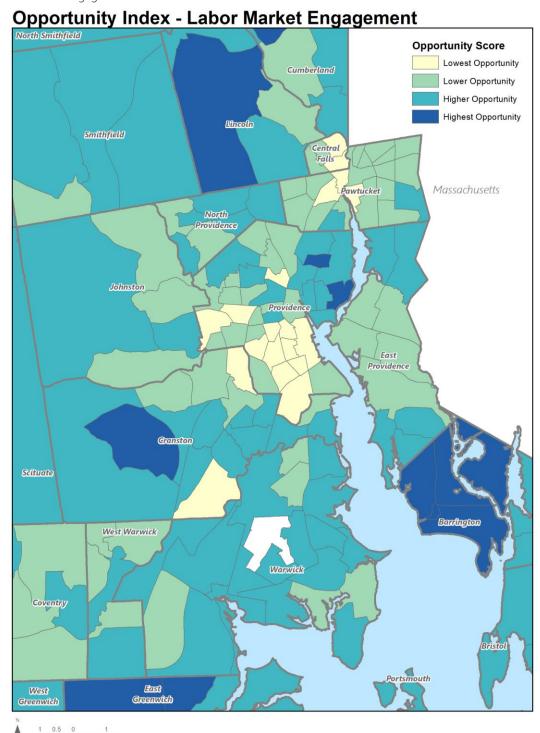
Labor Force Engagement Index

The Labor Force Engagement Index is a measure of the relative intensity of labor market engagement and human capital. The index is a combination of unemployment rates, labor force participation rates, and percent of the population with at least a bachelor's degree within a census tract. Employment opportunities are necessary for individuals to afford stable housing. Labor force participation represents the amount of labor resources available for the production for goods and services. The percent of the population with at least a bachelor's degree is used to estimate the availability of skilled labor. The lowest scores tended to be concentrated in Providence and Woonsocket, with pockets in Cranston and Pawtucket. Areas in close proximity to these areas also had low scores relative to the rest of the State. The highest scores can be found scattered around Rhode Island and include large portions of South County and the area around Aquidneck Island, Barrington, and northeastern Rhode Island. Entitlements among the highest scores include Cranston and eastern portions of Providence. Highly engaged labor forces in Rhode Island tend to be located in areas adjacent to universities.



Source: 2013-2017 American Community Survey, 5-Year Estimates (S2301, S1501)

Map 49 Labor Force Engagement Index around Providence

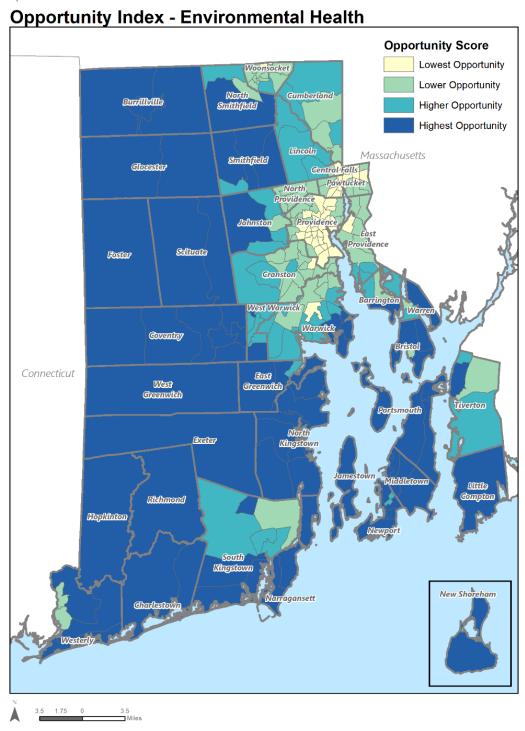


Source: 2013-2017 American Community Survey, 5-Year Estimates (S2301, S1501)

Environmental Health Index

The Environmental Health Index summarizes potential exposure to harmful toxins at the census tract level. Toxins include carcinogenic, respiratory, and neurological hazards. Higher index values indicate less exposure to toxins harmful to human health. Environmental hazards have an adverse effect on children's growth and development and can limit one's ability to work. Low-income and minority individuals are also found to be disproportionately affected by environmental hazards, perpetuating the lack of opportunity for vulnerable populations. The lowest environmental health scores are concentrated in urban Providence, likely a result of it being a high traffic area as a result of high concentrations of jobs and people. Most areas receiving low scores also tended to be located along high traffic corridors, such as I-295 and I-95. Tiverton is an exception, having a low score likely due to being the site of one of two active solid waste landfills in the State, and a 2002 discovery of highly contaminated soil due to the dumping of pollutants by former Fall River Gas Company

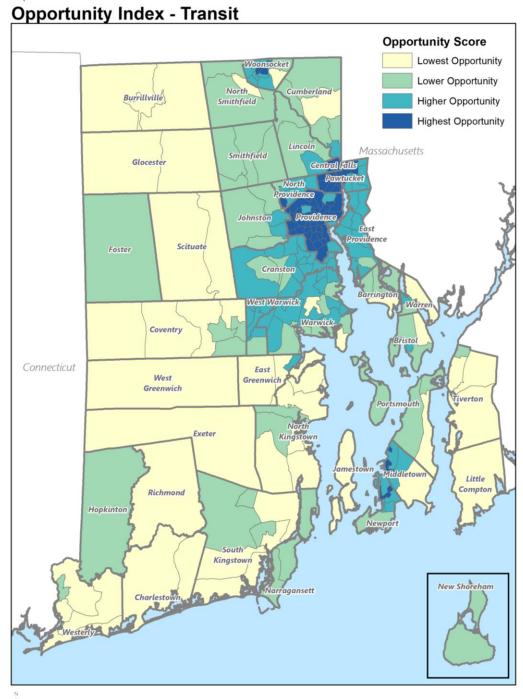
Map 50 Environmental Health Index



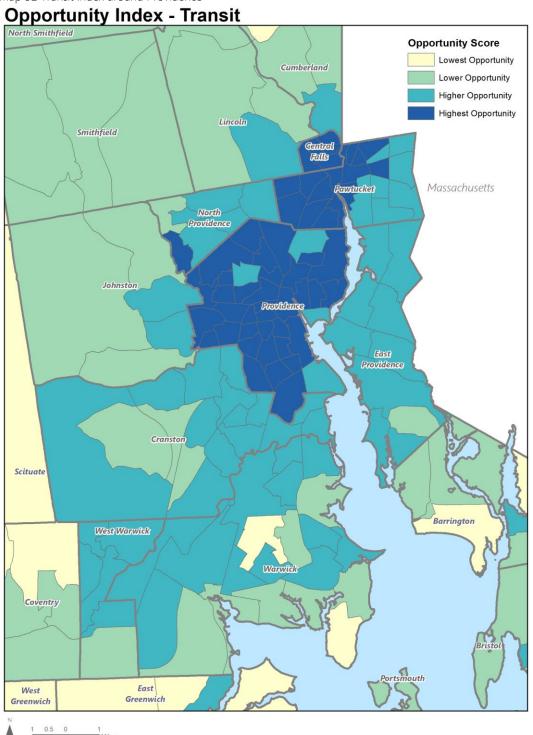
Source: HUD Affirmatively Furthering Fair Housing (AFFH), 2015; National Air Toxics Assessment (NATA) data, 2005

Transit Index

This index consists of the combination of the annual number of trips taken by 80% AMI individuals using public transit and transportation cost as a percent of income for a census tract. The number of transit trips is used as a proxy for transit accessibility. Access to transit is especially important to low- and moderate-income residents as public transit tends to increase access to community assets and reduce transportation costs overall. Transportation cost as a percent of income is a direct measure for transit affordability. The following map shows the Transit Index score with the Rhode Island Urban Services boundary overlay. This boundary indicates areas in which urban services such as public water and sewer will/will not be constructed. As expected, Providence has the highest transit index score along with adjacent communities. Woonsocket and Newport also had good access to public transit. More rural areas of Rhode Island scored poorly on this index where residents are more auto-dependent.

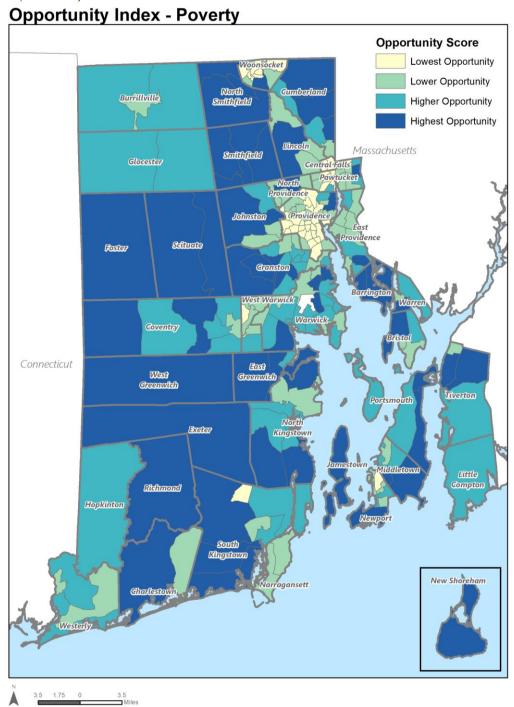


Map 52 Transit Index around Providence



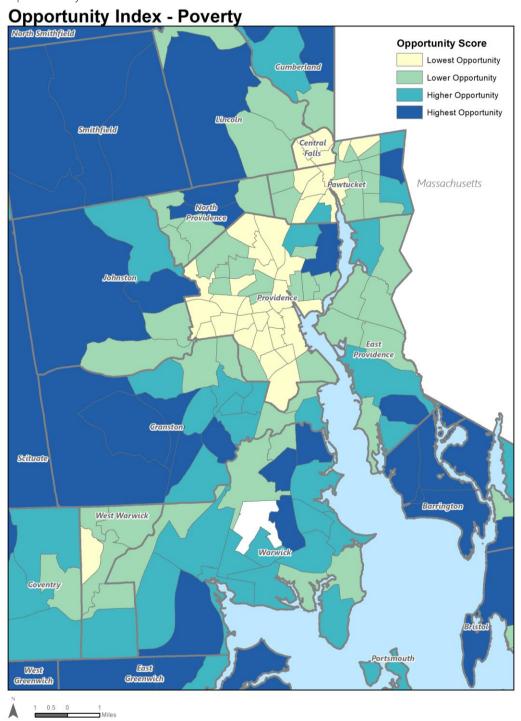
Poverty Index

This index is a combination of poverty rate and the percentage of households with children receiving public assistance. Public assistance includes Supplemental Security Income (SSI), cash public assistance income, or Food Stamps/SNAP. Poverty has lasting effects that can impact a wide range of factors, including public education primarily funded by the local community, job opportunities, and the ability to afford quality housing. Poverty tended to be most concentrated in Providence, Pawtucket, and Woonsocket. Communities adjacent to Providence also indicated high levels of poverty while areas further out had lower levels. Most Entitlement communities also showed high levels of poverty; exceptions to this include Cranston and the east side of Providence.



Source: 2013-2017 American Community Survey, 5-Year Estimates (DP03, B09010)

Map 54 Poverty Index around Providence



Source: 2013-2017 American Community Survey, 5-Year Estimates (DP03, B09010)

Location of Assisted Inventory in Higher Opportunity Areas

One way to utilize the Communities of Opportunity model is to evaluate the degree to which the State's assisted housing investment has been developed in higher opportunity areas. The assisted inventory includes rental properties funded through federal subsidy programs such as the Low-Income Housing Tax Credit (LIHTC) program, HOME, HTF and other State and local funding sources.

Almost one-third of the entire assisted inventory is located in Providence with the remainder evenly distributed in the other market types relative to their size. At the county subdivision level, 29.0% of existing assisted housing is located in Providence and primarily concentrated in South Providence. With a significant proportion of subsidized housing located in and around Providence, it is possible that current programs do not give low- and moderate-income households a wider variety of options in other areas. However, the areas in which the assisted inventory units tend to be concentrated also tend to have better access to public transit and lower transit costs overall that can serve as major contributing factors to clustering.

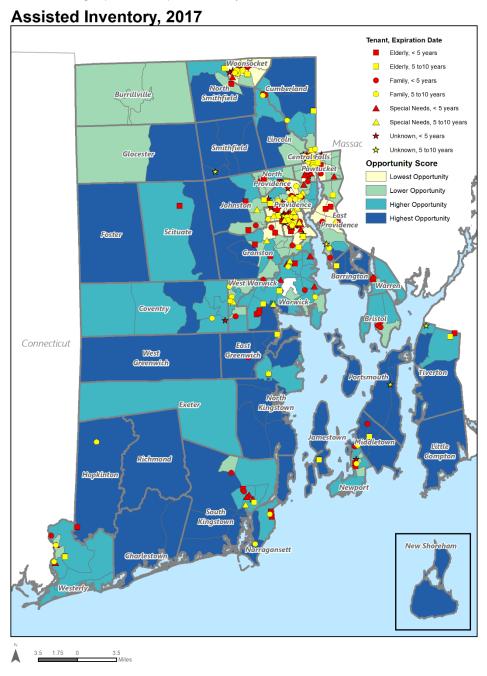
Figure 84 Assisted Housing Inventory in State and Entitlements

Market Type	# Units	% of all Units
Rhode Island	33,261	100.0%
Cranston	1,773	5.3%
East Providence	2,098	6.3%
Pawtucket	2,872	8.6%
Providence	10,703	32.2%
Warwick	2,017	6.1%
Woonsocket	3,046	9.2%

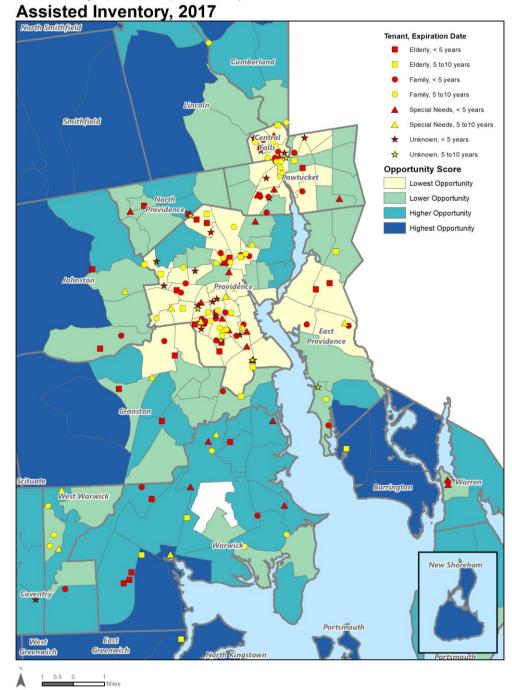
Source: RIHousing; National Housing Preservation Database

The following two maps reflect the expiration of the periods of affordability for much of the assisted housing in Rhode Island. However, they also illustrate the distribution of the units.

Map 55 Assisted housing expected to expire within 10 years



Source: RIHousing; National Housing Preservation Database



Map 56 Assisted housing expected to expire within 10 years around Providence

Source: RIHousing; National Housing Preservation Database

6. Lending Discrimination

There is evidence of lending discrimination in the private market. Any lender that meets an asset threshold and makes a minimum number of mortgages is required to report mortgage data according to the Home Mortgage Disclosure Act of 1975. The following three tables were generated using mortgage data for 2015-2017 for the State and the Entitlements. For more detailed information, refer to the tables in the Appendix.

Tables 100 through 107 in the Appendix indicate that Black and Hispanic applicants face higher denial rates and lower origination rates (approvals) than White applicants. Denial rates for Black and Hispanic applicants were 32.0% and 28.3%, respectively, compared to 18.8% for White applicants. Within the Entitlements, denial rates are higher in Pawtucket, Providence, and Woonsocket, in descending order. These communities also showed higher denial rates for Black applicants. Pawtucket and Providence also had higher denial rates for Hispanic applicants than other communities and the rest of the State. The remaining Entitlements and areas outside of the six cities show similar rates as the State.

Tables 108 through 115 in the Appendix indicate there are differences by race and ethnicity for originations (approvals) of high-cost loans. As of 2014, a high-cost loan was defined as a loan with an interest rate more than 6.5 percentage points higher than the average prime rate. Of all originated loans in the State, only 3.6% were considered high cost loans. However, Black and Hispanic loan recipients were likely to receive high-cost loans, at 7.0% and 7.1%, respectively. There are relatively fewer high-cost loan recipients for all races and ethnicities in East Providence and outside of the six cities. Within the Entitlement communities, the following differences were noted:

- All Entitlements had a higher proportion of high-cost loans than the State overall
- Higher rates of Black loan recipients receiving high-cost loans compared to the State were found in Woonsocket (11.3%), Warwick (10.6%), Providence (8.0%), and Cranston (8.9%).
- Higher rates of Hispanic loan recipients receiving high-cost loans relative to the State were found in Pawtucket (24.1%), Woonsocket (9.4%), and Providence (8.9%)

Tables 116 through 123 in the Appendix compare the rates of high-cost loan origination (approval) by whether the applicant's income was above or below the HUD area median family income (HAMFI) of the area in which the purchased home was located. Among all high-cost loans in the State, 42.5% of recipients had incomes above HAMFI; only White applicants above HAMFI showed higher rates at 43.7%. However, it should be noted that high-cost loans only comprise 3.6% all originated loans.

7. Public Policy Analysis

Impediments to fair housing choice can take many forms. Some policies, practices, and procedures may appear neutral on their face but adversely affect the provision of fair housing in reality. An important element of the AI is an examination of public policies in Rhode Island to determine opportunities for reducing obstacles to fair housing and expanding housing choice.

Land Use and Zoning Laws

The Building Zone Regulations of the Entitlement communities in Rhode Island were evaluated based on HUD's Fair Housing Planning Guide. The full criteria are based on how the ordinance:

- Defines "family" inclusively, without cap on number of unrelated persons with focus on function as a single housekeeping unit
- Defines "group home" or similarly named land use compared to single family dwellings
- Allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use/conditional use permit or public hearing
- Regulates the siting of group homes as single family dwelling units without an additional regulatory provision
- Has a "Reasonable Accommodation" provision or allows for persons with disabilities to request reasonable accommodation/modification to regulatory provisions
- Permits multi-family housing of more than 4 units per structure in one or more residential zoning districts by-right
- Does not distinguish between "affordable housing/multi-family housing" (i.e. financed with public funds) and "multi-family housing" (i.e. financed with private funds)
- Does not restrict residential uses such as emergency housing/homeless shelters, transitional housing, or permanent supportive housing facilities exclusive to non-residential zoning
- Permits manufactures and modular housing on single lots like single family dwelling units
- Provides residential zoning districts with minimum lot sizes of ¼ acre or less
- Does not include exterior design/aesthetic standards for all single-family dwelling units regardless of size, location, or zoning district

It is important to consider that the presence of inclusive zoning does not necessarily guarantee a zoning ordinance's fairness. The analysis does not address the issue of availability, suitability, or development potential of sites.

The tables at the end of this section summarize the zoning risk assessment for the six Entitlement communities. A score of 11 places the ordinance at low risk relative to discriminatory provisions for members of protected classes. A score of between 11 and 16.5 places zoning ordinances at moderate risk, while any higher score places zoning ordinances at high risk. All six Entitlements were at least at moderate risk with respect to their municipal zoning provisions.

To address the lack of affordable housing, the State enacted the Rhode Island Low and Moderate Income Housing Act (Rhode Island General Laws 45-53) requiring 10% of each municipalities' housing stock be "affordable." While it streamlines affordable housing for most of the State, ten urban communities are exempt, including the Entitlements. However, it needs to be noted that not only is this counter to the State's Land Use 2025 Plan, it is a substantial impediment to the incentive for the creation of thousands of long-term affordable homes. For example, between Cranston and Warwick, more than 3,200 homes would need to be developed in order for them to reach their respective goals of 10%. Moreover, it is within the State's own guidance that it favors development within the Urban Services Boundary where there is public water and sewer services. According to the opportunity analysis conducted in the AI, both of these cities also represent better than average opportunity, especially compared to other Entitlement Cities.

The main contributor to placing these zoning ordinances at-risk of having discriminatory provisions is using the State's definition for 'family' and 'community residences.' All Entitlement cities' zoning codes defined 'family' or 'household' as follows:

"A person or persons related by blood, marriage or other legal means" or "one or more persons living together in a single dwelling unit, with common access to and common use of, all living and eating areas and all areas and facilities for the preparation and storage of food within the dwelling unit. An individual household shall consist of any one of the following: 1. A family, which may also include servants and employees living with the family; 2. A person or group of unrelated persons living together, the number of which shall not exceed three."

Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes that limit their housing choice. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. This restriction can impede the development of group homes, effectively limiting housing choice for people with disabilities. However, caps on unrelated individuals residing together may be warranted to avoid overcrowding, which could create health and safety concerns.

In areas with a large student population, such as Providence and Kingston, there is a high degree of competition and demand for rental housing. This upward pressure can drive rental costs up and can result in developers creating housing designed specifically for students or purchasing single-family homes for student housing. The City of Providence adopted a student housing ordinance in 2015 prohibiting no more than three students from occupying single-family homes. This potentially provides low- and moderate-income families more affordable housing options in Providence.

With a separate definition for group homes under the State term "community residence," the zoning code may serve as a barrier for more housing choices for individuals with disabilities. All Entitlement cities' zoning ordinances defined "community residence" as follows:

"A home or residential facility where children and/or adults reside in a family setting and may or may not receive supervised care. This shall not include halfway houses or substance abuse treatment facilities. This shall include, but not be limited to, the following:

- 1. Whenever six or fewer mentally challenged children or adults reside in any type of residence in the community, as licensed by the state pursuant to Chapter 24 of Title 40.1 of the General Laws of Rhode Island (RIGL). All requirements pertaining to local zoning are waived for these community residences
- 2. A group home providing care or supervision or both, to not more than eight mentally disabled or mentally handicapped or physically handicapped persons and licensed by the state pursuant to Chapter 24 of Title 40.1 of the RIGL
- 3. A residence for children providing care or supervision or both, to not more than eight children including those of the care giver and licensed by the state pursuant to Chapter 72.1 of Title 42 of the RIGL
- 4. A community transitional residence providing care or assistance or both, to no more than six unrelated persons or no more than three families, not to exceed a total of eight persons, requiring temporary financial assistance and/or to persons who are victims of crimes, abuse or neglect and who are expected to reside in that residence not less than sixty (60) days nor more than two years. Residents will have access to and use of all common areas, including eating areas and living rooms and will receive appropriate social services for the purpose of fostering independence, self-sufficiency and eventual transition to a permanent living situation."

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use.

Finally, all Entitlements except for Providence do not permit mobile or manufactured homes to be located in residential areas. This is likely due to the regulation on manufactured housing being outdated. Manufactured housing is more similar to traditional site-built housing than the traditional mobile home decades ago. As a more affordable housing option than site-built housing, manufactured homes can provide housing opportunities for low-income families.

The only Entitlement city with a high risk relative to discriminatory practices due to additional language issues is Pawtucket. Pawtucket does not include specific reference to the Rhode Island Fair Housing Practices Act in relation to providing reasonable accommodation for individuals with disabilities. Reasonable accommodation in relation to housing is not mentioned in its ordinances; the only mention of reasonable accommodation is related to adding a second designated employee smoking areas, as recommended in the Americans With Disabilities Act.

While Providence's zoning was at moderate risk, it was the only city to exclusively restrict transitional shelters to non-residential areas, permitting them only in commercial and industrial zones.

Figure 85 Zoning Risk Assessment, City of Cranston

Scoring: 1 – low risk for discrimination 2 – high risk for discrimination

Zonir	ng Ordinance Regulatory Provision			Score
1.	Ordinance defines "family" inclusively, without cap on number of unrelated persons, with focus on functioning as a single housekeeping unit	Yes	No	2
	Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit	(1)	(2)	
2.	Ordinance defines "group home" or similarly named land use as "a single family dwelling unit"	Yes	No	2
		(1)	(2)	
3.	Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special use / conditional use permit or	Yes	No	2
	public hearing	(1)	(2)	
4.	Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	Yes	No	2
		(1)	(2)	
5.	Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable accommodation /	Yes	No	1
	modification to regulatory provisions	(1)	(2)	
6.	Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts by-right	Yes	No	1
		(1)	(2)	
7.	Ordinance does not distinguish between "affordable housing / multi-family housing" (i.e., financed with public funds) and "multi-family housing"	Yes	No	1
	(i.e., financed without any public funds)	(1)	(2)	
8.	Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing or permanent supportive housing	Yes	No	1
	facilities exclusively to non-residential zoning districts	(1)	(2)	İ
9.	Ordinance permits manufactured and modular housing on single lots like single family dwelling units	Yes	No	2
		(1)	(2)	
10.	Ordinance provides residential zoning districts with minimum lot sizes of 1/4 acre or less	Yes	No	1
		(1)	(2)	
11.	Ordinance does not include exterior standards for all single family dwelling units regardless of size, location or zoning district	Yes	No	1
	Ex: all brick construction, minimum square footage of 2,000, etc.	(1)	(2)	
		TOTAL	SCORE	16

To calculate Zoning Risk Score, divide TOTAL SCORE by 11. Cranston's score is 1.45.

1.00: Ordinance is at LOW risk relative to discriminatory provisions for housing and members of the protected classes.

1.01 – 1.49: Ordinance is at MODERATE risk relative to discriminatory provisions for housing and members of the protected classes.

1.50 – 2.00: Ordinance is at HIGH risk relative to discriminatory provisions for housing and members of the protected classes.

Figure 86 Zoning Risk Assessment, City of East Providence

Scoring: 1 – low risk for discrimination 2 – high risk for discrimination

Zonir	g Ordinance Regulatory Provision			Score
1.	Ordinance defines "family" inclusively, without cap on number of unrelated persons, with focus on functioning as a	Yes	No	2
	single housekeeping unit	(1)	(2)	
	Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit			
2.	Ordinance defines "group home" or similarly named land use as "a single family dwelling unit"	Yes	No	2
		(1)	(2)	
3.	Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a special	Yes	No	2
	use / conditional use permit or public hearing	(1)	(2)	
4.	Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	Yes	No	2
		(1)	(2)	
5.	Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request reasonable	Yes	No	1
	accommodation / modification to regulatory provisions	(1)	(2)	
6.	Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning districts	Yes	No	1
	by-right	(1)	(2)	
7.	Ordinance does not distinguish between "affordable housing / multi-family housing" (i.e., financed with public	Yes	No	1
	funds) and "multi-family housing" (i.e., financed without any public funds)	(1)	(2)	
8.	Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional housing or	Yes	No	1
	permanent supportive housing facilities exclusively to non-residential zoning districts	(1)	(2)	
9.	Ordinance permits manufactured and modular housing on single lots like single family dwelling units	Yes	No	2
		(1)	(2)	
10.	Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	Yes	No	1
		(1)	(2)	
11.	Ordinance does not include exterior standards for all single family dwelling units regardless of size, location or	Yes	No	1
	zoning district	(1)	(2)	
	Ex: all brick construction, minimum square footage of 2,000, etc.			
			TOTAL SCORE	16

To calculate Zoning Risk Score, divide TOTAL SCORE by 11. East Providence's score is 1.45.

1.00: Ordinance is at LOW risk relative to discriminatory provisions for housing and members of the protected classes.

1.01 – 1.49: Ordinance is at MODERATE risk relative to discriminatory provisions for housing and members of the protected classes.

1.50 – 2.00: Ordinance is at HIGH risk relative to discriminatory provisions for housing and members of the protected classes.

Figure 87 Zoning Risk Assessment, City of Pawtucket

Scoring: 1 – low risk for discrimination2 – high risk for discrimination

Zonin	g Ordinance Regulatory Provision			Score
1.	Ordinance defines "family" inclusively, without cap on number of unrelated persons, with focus on functioning	Yes	No	2
	as a single housekeeping unit	(1)	(2)	
	Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit			
2.	Ordinance defines "group home" or similarly named land use as "a single family dwelling unit"	Yes	No	2
		(1)	(2)	
3.	Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a	Yes	No	2
	special use / conditional use permit or public hearing	(1)	(2)	
4.	Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	Yes	No	2
		(1)	(2)	
5.	Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request	Yes	No	2
	reasonable accommodation / modification to regulatory provisions	(1)	(2)	
6.	Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning	Yes	No	1
	districts by-right	(1)	(2)	
7.	Ordinance does not distinguish between "affordable housing / multi-family housing" (i.e., financed with public	Yes	No	2
	funds) and "multi-family housing" (i.e., financed without any public funds)	(1)	(2)	
8.	Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional	Yes	No	1
	housing or permanent supportive housing facilities exclusively to non-residential zoning districts	(1)	(2)	
9.	Ordinance permits manufactured and modular housing on single lots like single family dwelling units	Yes	No	2
		(1)	(2)	
10.	Ordinance provides residential zoning districts with minimum lot sizes of ¼ acre or less	Yes	No	1
	·	(1)	(2)	
11.	Ordinance does not include exterior standards for all single family dwelling units regardless of size, location or	Yes	No	1
	zoning district	(1)	(2)	
	Ex: all brick construction, minimum square footage of 2,000, etc.	.,		
	· • •		TOTAL SCORE	18

To calculate Zoning Risk Score, divide TOTAL SCORE by 11. Pawtucket's score is 1.64.

1.00: Ordinance is at LOW risk relative to discriminatory provisions for housing and members of the protected classes.

1.01 – 1.49: Ordinance is at MODERATE risk relative to discriminatory provisions for housing and members of the protected classes.

1.50 – 2.00: Ordinance is at HIGH risk relative to discriminatory provisions for housing and members of the protected classes.

Figure 88 Zoning Risk Assessment, City of Providence

Scoring: 1 – low risk for discrimination 2 – high risk for discrimination

Zonin	g Ordinance Regulatory Provision			Score
1.	Ordinance defines "family" inclusively, without cap on number of unrelated persons, with focus on functioning	Yes	No	2
	as a single housekeeping unit	(1)	(2)	
	Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit			
2.	Ordinance defines "group home" or similarly named land use as "a single family dwelling unit"	Yes	No	2
		(1)	(2)	
3.	Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a	Yes	No	1
	special use / conditional use permit or public hearing	(1)	(2)	
4.	Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	Yes	No	2
		(1)	(2)	
5.	Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request	Yes	No	1
	reasonable accommodation / modification to regulatory provisions	(1)	(2)	
6.	Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning	Yes	No	1
	districts by-right	(1)	(2)	
7.	Ordinance does not distinguish between "affordable housing / multi-family housing" (i.e., financed with public	Yes	No	1
	funds) and "multi-family housing" (i.e., financed without any public funds)	(1)	(2)	
8.	Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional	Yes	No	1
	housing or permanent supportive housing facilities exclusively to non-residential zoning districts	(1)	(2)	
9.	Ordinance permits manufactured and modular housing on single lots like single family dwelling units	Yes	No	1
		(1)	(2)	
10.	Ordinance provides residential zoning districts with minimum lot sizes of 1/4 acre or less	Yes	No	1
		(1)	(2)	
11.	Ordinance does not include exterior standards for all single family dwelling units regardless of size, location or	Yes	No	1
	zoning district	(1)	(2)	
	Ex: all brick construction, minimum square footage of 2,000, etc.			
			TOTAL SCORE	14

To calculate Zoning Risk Score, divide TOTAL SCORE by 11. Providence's score is 1.27.

^{1.00:} Ordinance is at LOW risk relative to discriminatory provisions for housing and members of the protected classes.

^{1.01 – 1.49:} Ordinance is at MODERATE risk relative to discriminatory provisions for housing and members of the protected classes.

^{1.50 – 2.00:} Ordinance is at HIGH risk relative to discriminatory provisions for housing and members of the protected classes.

Figure 89 Zoning Risk Assessment, City of Warwick

Scoring: 1 – low risk for discrimination2 – high risk for discrimination

Zonin	g Ordinance Regulatory Provision			Score
1.	Ordinance defines "family" inclusively, without cap on number of unrelated persons, with focus on functioning	Yes	No	2
	as a single housekeeping unit	(1)	(2)	
	Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit			
2.	Ordinance defines "group home" or similarly named land use as "a single family dwelling unit"	Yes	No	2
		(1)	(2)	
3.	Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a	Yes	No	2
	special use / conditional use permit or public hearing	(1)	(2)	
4.	Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	Yes	No	2
		(1)	(2)	
5.	Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request	Yes	No	1
	reasonable accommodation / modification to regulatory provisions	(1)	(2)	
6.	Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning	Yes	No	1
	districts by-right	(1)	(2)	
7.	Ordinance does not distinguish between "affordable housing / multi-family housing" (i.e., financed with public	Yes	No	1
	funds) and "multi-family housing" (i.e., financed without any public funds)	(1)	(2)	
8.	Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional	Yes	No	1
	housing or permanent supportive housing facilities exclusively to non-residential zoning districts	(1)	(2)	
9.	Ordinance permits manufactured and modular housing on single lots like single family dwelling units	Yes	No	2
		(1)	(2)	
10.	Ordinance provides residential zoning districts with minimum lot sizes of 1/4 acre or less	Yes	No	1
		(1)	(2)	
11.	Ordinance does not include exterior standards for all single family dwelling units regardless of size, location or	Yes	No	1
	zoning district	(1)	(2)	
	Ex: all brick construction, minimum square footage of 2,000, etc.			
			TOTAL SCORE	16

To calculate Zoning Risk Score, divide TOTAL SCORE by 11. Warwick's score is 1.45.

^{1.00:} Ordinance is at LOW risk relative to discriminatory provisions for housing and members of the protected classes.

^{1.01 – 1.49:} Ordinance is at MODERATE risk relative to discriminatory provisions for housing and members of the protected classes.

^{1.50 – 2.00:} Ordinance is at HIGH risk relative to discriminatory provisions for housing and members of the protected classes.

Figure 90 Zoning Risk Assessment, City of Woonsocket

Scoring: 1 – low risk for discrimination2 – high risk for discrimination

Zonin	g Ordinance Regulatory Provision			Score
1.	Ordinance defines "family" inclusively, without cap on number of unrelated persons, with focus on functioning	Yes	No	2
	as a single housekeeping unit	(1)	(2)	
	Ex: Two or more persons who live in the same dwelling unit and function as a single housekeeping unit			
2.	Ordinance defines "group home" or similarly named land use as "a single family dwelling unit"	Yes	No	2
		(1)	(2)	
3.	Ordinance allows up to 6 unrelated people with disabilities to reside in a group home without requiring a	Yes	No	2
	special use / conditional use permit or public hearing	(1)	(2)	
4.	Ordinance regulates group homes as single family dwelling units without any additional regulatory provisions	Yes	No	2
		(1)	(2)	
5.	Ordinance has a Reasonable Accommodation provision or allows for persons with disabilities to request	Yes	No	1
	reasonable accommodation / modification to regulatory provisions	(1)	(2)	
6.	Ordinance permits multi-family housing of more than 4 units/structure in one or more residential zoning	Yes	No	1
	districts by-right	(1)	(2)	
7.	Ordinance does not distinguish between "affordable housing / multi-family housing" (i.e., financed with public	Yes	No	1
	funds) and "multi-family housing" (i.e., financed without any public funds)	(1)	(2)	
8.	Ordinance does not restrict residential uses such as emergency housing/homeless shelters, transitional	Yes	No	1
	housing or permanent supportive housing facilities exclusively to non-residential zoning districts	(1)	(2)	
9.	Ordinance permits manufactured and modular housing on single lots like single family dwelling units	Yes	No	2
		(1)	(2)	
10.	Ordinance provides residential zoning districts with minimum lot sizes of 1/4 acre or less	Yes	No	1
		(1)	(2)	
11.	Ordinance does not include exterior standards for all single family dwelling units regardless of size, location or	Yes	No	1
	zoning district	(1)	(2)	
	Ex: all brick construction, minimum square footage of 2,000, etc.			
			TOTAL SCORE	16

To calculate Zoning Risk Score, divide TOTAL SCORE by 11. Woonsocket's score is 1.45.

^{1.00:} Ordinance is at LOW risk relative to discriminatory provisions for housing and members of the protected classes.

^{1.01 – 1.49:} Ordinance is at MODERATE risk relative to discriminatory provisions for housing and members of the protected classes.

^{1.50 – 2.00:} Ordinance is at HIGH risk relative to discriminatory provisions for housing and members of the protected classes.

Language Access Plan

The US Department of Justice provides guidance on complying with Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons of the Civil Rights Act of 1964 through the LEP Safe Harbor Threshold. This provision stipulates that for each LEP group that meets a threshold of either 1,000 individuals or 5% of the population to be served (whichever is less), the written translation of vital documents must be provided for these non-English users. As noted earlier, the largest LEP language spoken through Rhode Island is Spanish, followed by Portuguese.

HUD grantees are responsible for serving persons with LEP and who may be income-eligible for services and programs in accordance with Title VI of the Civil Rights Act of 1964. Preparation of a Language Access Plan (LAP) is the most effective way to achieve compliance. The Rhode Island Statewide Planning Program prepares and maintains plans to be implemented through state departments, including the State's LEP Plan.

The most up-to-date version of the LAP was established in September 2017, outlining how the State identifies LEP individuals who need language assistance, reaches out to community organizations that serve LEP persons, and processes for language assistance measures such as translation and interpretation. The document clearly identifies all LEP populations that meet the safe harbor threshold, identifying nine languages for which written translations must be provided. Processes streamlining how to respond and assist LEP persons, translate written materials, and provide oral language services are detailed step-by-step.

The primary method of providing notice of available language services to LEP persons include providing notices of public hearings and workshops on the Statewide Planning's website in other languages, notices on local Spanish radio stations, and providing notice of language interpreter availability by advanced request for all meetings and events.

The LAP is mentioned to be reviewed and updated annually, including conducting surveys of staff for language capabilities and updating important contact information. A Title VI and LEP complaint procedure is also detailed for any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation. All complaints must be filed within 180 days after the date of discrimination to the Title VI Manager in writing.

Further detail on LAPs within Entitlement communities are addressed below.

Cranston

Currently, the City of Cranston does not have a publicly accessible LAP in place. Cranston has a Spanish-speaking LEP population of 2,580, meeting the safe harbor threshold.

East Providence

The only LEP population meeting the safe harbor threshold in East Providence are Portuguese speakers. While the City does not have a LAP, it does have an Affirmative Action and Equal Opportunity Office to deal with "with allegations of Civil Rights violations and accepts and investigates all allegations of unlawful employment discrimination and harassment based on race, gender, age (over-40), color, religion, national origin, sexual orientation, gender identity or disability." However, there is no explicit mention of procedures related to LEP persons requiring translation or interpretation to access city programs and services. The City's website does not appear to have a Portuguese translation, and the only forms digitally available in Portuguese are related to the City's Lead Safe Rehabilitation Program.

In June 2020, the Mayor of East Providence issued a statement acknowledging his City's diversity and establishing a Community Advisory Board "to promote communication between communities within the city and the administration, to reduce systemic racism and bigotry and to promote the values of diversity and inclusivity within the city." He also named a Municipal Integrity Officer, who will be "a point of contact for any complaints from city residents of social injustice, systemic racism within the community and any other complaints regarding city operations."

Pawtucket

The City of Pawtucket does not currently have a LAP. Three LEP populations in Pawtucket meet the safe harbor threshold: Spanish, Portuguese or Portuguese Creole, and French Creole.

Providence

Providence adopted a city-wide Language Access Toolkit in July 2019 to integrate language access into departments' programming and budget planning. The document makes clear that providing language access services is critical to keeping Providence thriving and inclusive as a long-term goal. Using the Safe Harbor threshold, the toolkit makes clear the LEP populations that will be provided free written and oral language services: Spanish/Spanish Creole, Mon-Khmer/Cambodian, Chinese, and Portuguese/Portuguese Creole. Department roles in terms of in-language outreach, event interpretation, and document translation are clearly outlined along with how to plan projects with language access in mind. Multiple points of contact for technical assistance and inquiries are provided. Additionally, the city also considers areas that may have a higher concentration of persons with LEP with a map identifying census tracts with large concentrations of individuals born outside of the United States.

Oral Interpretation and translation services are provided through a blanket contract across city departments. Interpreters are available both in-person and by phone, and various types of interpretation services (simultaneous, consecutive, and summary) can be provided for events as needed. Processes for planning interpretation services are clearly outlined with a timeline with necessary steps. Similar steps are also provided for translation services.

In addition to these services, the City of Providence also provides:

- Shared interpretation equipment
- Language banks to ensure consistency in communications when working with outside vendors and community interpreters
- In-language media lists for identifying in-language media outlets for outreach, in-language media strategies, and designing in-language media ads
- A city website available in all safe-harbor languages, providing information on key initiatives, news, and services.

Staff training is provided by the Providence Human Relations Commission.

Warwick

The City of Warwick does not currently have a LAP. However, Warwick does not have any LEP populations that meet the safe harbor threshold.

Woonsocket

Woonsocket's Spanish-speaking LEP population meets the safe harbor threshold. While the City's website is available in multiple languages, forms and documents are only available in English. The City does not have a LAP.

Federal Funding Sources and Programs

Community Development Block Grant Program

The Community Development Block Grant (CDBG) Program provides annual grants on a formula basis to states, cities, and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. All Entitlements and the State receive CDBG funding.

State of Rhode Island - Office of Housing and Community Development

According to Rhode Island's PY2019 Annual Action Plan, CDBG funds were allocated for distribution as follows:

- Affordable Housing Development 30%
- Safe and Healthy Housing (Housing Rehab) 25%
- Non-Housing Community Development 45%

Housing Rehabilitation and Affordable Housing are high priority activities, with applications accepted on a first come, first serve basis. Complete applications meeting all threshold criteria are funded up to the set-aside amount.

Non-housing, non-economic development applications are scored based on the following factors:

- 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 needs related public improvements/facilities and public services
 - o Water/sewer related activities
 - o Street/Streetscape activities
 - o Job training and essential services for the homeless and elderly

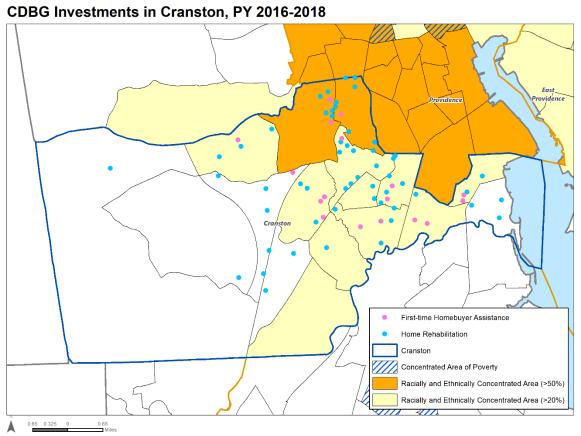
Applications are further evaluated qualitatively by a committee with expertise in community development based on timeliness, feasibility, capacity, performance, and whether they receive other sources of funding.

While the State has a specific goal titled "Affirmatively Further Fair Housing," no funds are specifically allocated toward this goal. There is potential to use funds for fair housing enforcement. However, it is important to note that all goals outlined in Rhode Island's Strategic Plan are reflected as important to fair housing. While 55% of the State's CDBG funds are allocated to housing, the State uses 100% of other funding sources, such as National Housing Trust Fund (HTF) and HOME funds, for these purposes. Priorities are clearly intended to improve the quality of life of LMI persons and individuals with special needs to obtain and maintain quality housing.

Cranston

For affordable housing related activities, the City of Cranston used CDBG-funds for housing rehabilitation and first-time homebuyer assistance programs. For Program Years 2016 through 2018, 55 housing units were rehabilitated, and 18 first-time homeowners were assisted. Sixty CDBG investments were in racially and ethnically concentrated areas: 43 home rehabs and 17 first-time homebuyers. Of these, 13 home rehabs and three assisted first-time homebuyers were in minority-majority areas. There are no concentrated areas of poverty in Cranston.

Map 57 CDBG Investments in Cranston

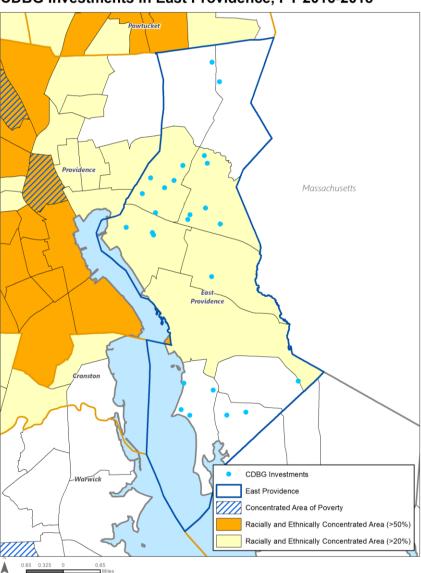


Source: City of Cranston, Department of Community Development

East Providence

CDBG-funded housing investments in East Providence were solely focused on home rehabilitation. East Providence funded 27 home rehabilitations during Program Years 2016 through 2018. All households assisted were below 80% AMI and over one-third were below 50% AMI. Additionally, 22% of assisted households were Black. While there are no concentrated areas of poverty in East Providence, 18 out of 27 home rehabs were in racially and ethnically concentrated areas (>20% minority population).

Map 58 CDBG Investments in East Providence



CDBG Investments in East Providence, PY 2016-2018

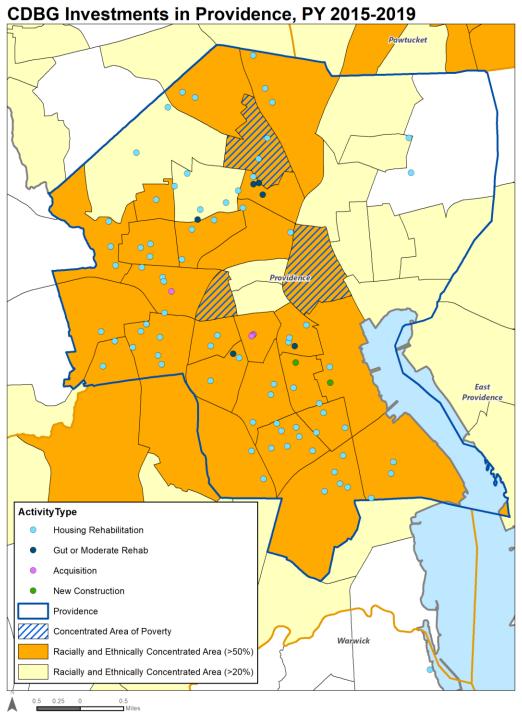
Source: City of East Providence, Community Development Office

Providence

The City of Providence conducted 90 projects using CDBG funds between 2015 and 2019. Housing rehabilitation was the primary use of CDBG funds, being used for 78, or 86.7%, of CDBG-funded projects. Most of these were rehabs were conducted through the City Home Repair Program, with the exception being three rehabs conducted by Amos House in 2015. All home rehabs were for family households. Six more substantial gut or moderate rehabs were conducted in 2015 and 2016. This includes the City's EveryHome Receivership program for nuisance properties in need of code violation corrections and Operation Stand Down Veteran's Housing Rehabilitation Program for homeless veterans. Finally, four acquisitions were conducted in 2015 using CDBG funds, three of which were for the Broad Street Revitalization, and two new construction projects in 2017 by Family Housing Development Corporation (FHDC) for the second phase of their affordable housing project.

Only two projects were located in R/ECAPs and the geographic distribution of the projects wide, demonstrating efforts to deconcentrate poverty. While these projects are primarily located in lower opportunity areas, most of Providence is considered to have the lowest levels of opportunity in the State according to the Opportunity Index. Investment in higher opportunity areas in northwestern and eastern Providence may provide additional opportunities to low- and moderate-income households.

2019 Rhode Island Analysis of Impediments to Fair Housing Choice

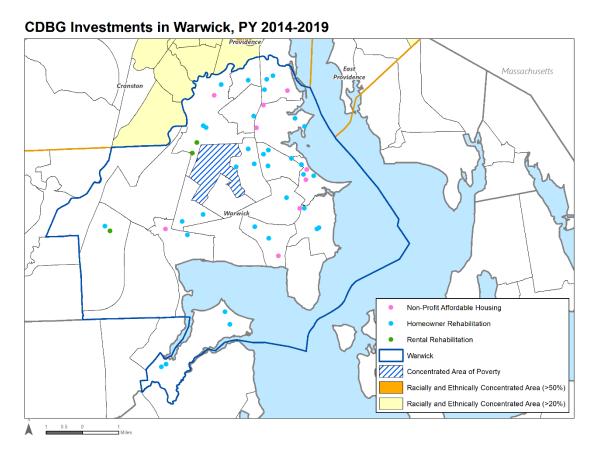


Source: City of Providence, Department of Planning & Development

Warwick

The City of Warwick's use of CDBG funding for housing-related activities are allocated toward long-term deed restricted nonprofit-developed affordable housing units and homeowner and rental rehab of privately owned housing units. Between 2014 and 2019, Warwick invested in 71 housing units: 34 units for homeowner rehab (47.9%), 32 units for non-profit affordable housing developments (45.1%) and 5 units for rental rehab (7.0%). With 91.6% of Warwick's population being White, it is reasonable that most CDBG investments are used for White households. No CDBG investments were located in the concentrated area of poverty, which primarily consists of TF Green Airport. Additionally, 18 investments assisted elderly households (25.4% of all CDBG investments), 16 investments assisted family households (22.5%), and 2 investments assisted households with persons with disabilities (2.8%).

Map 60 CDBG Investments in Warwick



Source: City of Warwick, Office of Housing & Community Development

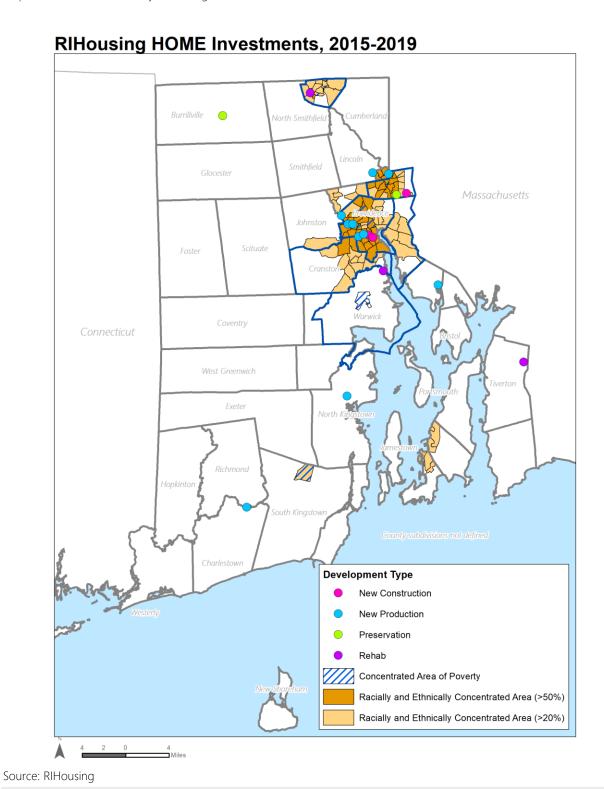
HOME Investment Partnerships Program

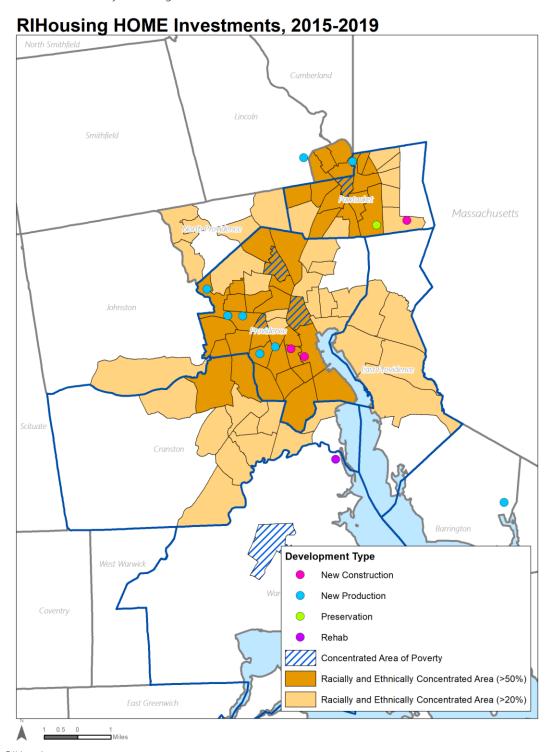
The HOME Investment Partnerships Program (HOME) provides formula grants to States and localities that communities use - often in partnership with local nonprofit groups - to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. HOME is the largest federal block grant to state and local governments designed exclusively to create affordable housing opportunities for low-income households. Only RIHousing, Pawtucket, Providence, and Woonsocket are HOME Participating Jurisdictions and are eligible to receive HOME funds directly from HUD. Data on HOME investments was only provided by Providence. RIHousing administers the State's HOME funds, making them available for rental housing acquisition, preservation and production ("Development"), as well as for Tenant Based Rental Assistance ("TBRA"). HOME Development funds are allocated through a competitive process, and RIHousing makes available their scoring criteria for awarding recipients through the Annual ActionAllocation Plan. TBRA funds are administered directly by RIHousing and may be available to assist qualifying renters with security deposits, for rental payment assistance, or for utility deposit assistance where security deposit assistance or rental payment assistance is also provided.

RIHousing

RIHousing invested in 19 projects using HOME funds between 2015 and 2019, producing, preserving, or rehabilitating 719 housing units. Please note that this unit count includes all units in a development and not just HOME-specific units. The majority of HOME-funded activities were used for new production of rental units, consisting of 11 projects and 438 rental units. Preservation made up the next largest portion of HOME activities in terms of housing units impacted, with RIHousing providing refinancing services for 213 housing units within two projects, Prospect Heights - Phase II in Pawtucket and Bradford Court Apartments in Burrilville. The remaining HOME projects include the rehabilitation of 46 rental units and new construction of 20 rental units and two owner-occupied housing units.

Geographically, 11 out of 19 project sites were located in racially and ethnically concentrated areas in Providence, Pawtucket, and Woonsocket. However, none were located in concentrated areas of poverty, indicating efforts to deconcentrate poverty. These projects consist of 55.8% of all housing units within HOME investments and were primarily newly produced rental units. The remaining projects were located across a wide geography in areas with higher levels of opportunity relative to Providence and the surrounding areas.

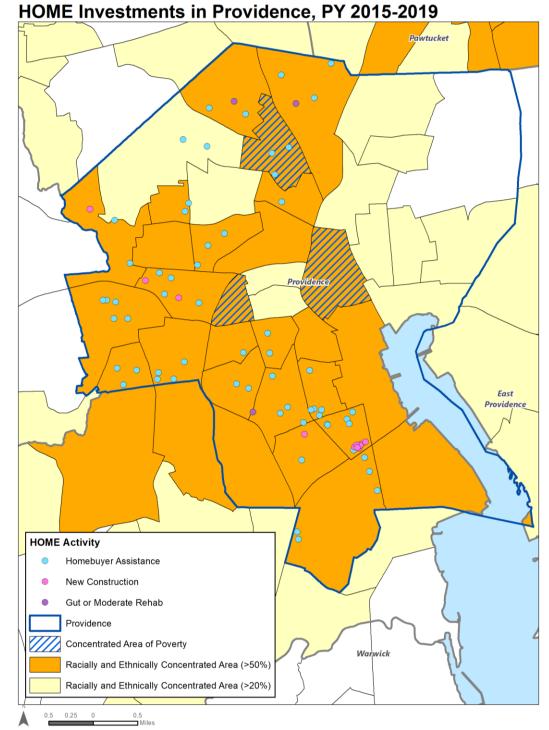




Source: RIHousing

Providence

Between 2015 and 2019, the City of Providence conducted 79 HOME activities. The majority of HOME-funded activities were used for homebuyer assistance through the Housing Network of RI Down payment Program, utilized by 61 family households. Additionally, fifteen newly constructed properties were funded through HOME, including 100 units for persons with disabilities, elderly over the age of 62 years, and families at Sixty King Street (60 units in 2016) and Maplewoods Apartments (40 units in 2017). The other new construction projects showed preference for family households. Finally, the remaining three HOME projects were used for gut or moderate rehabilitation in 2015. Two of these projects targeted family households, while the other project was for Whitmarsh House, a nonprofit agency serving boys and men with developmental disabilities. All HOME investments are located in racially and ethnically concentrated areas, which is a given due to the City's high minority population. Only three HOME projects, or 3.8% of all HOME investments, were found in R/ECAPs, indicating efforts to deconcentrate poverty. Similar to CDBG-funded projects, investment in higher opportunity areas may provide additional opportunities to low- and moderate-income households.



Map 63 HOME Investments in Providence, 2015-2019

Source: City of Providence, Department of Planning & Development

National Housing Trust Fund

The National Housing Trust Fund is a relatively new housing resource implemented in 2016. The program is intended for building, rehabilitating, preserving, and operating rental housing for extremely low-income people and households. RIHousing administers the State's Housing Trust Fund award through a competitive process and makes available their scoring criteria for awarding recipients through the Annual Allocation Plan.

RIHousing HOME and National Housing Trust Fund Development Priorities

High Priorities

- o Acquisition and/or substantial rehabilitation and/or new construction to provide rental units for families
- o Acquisition and/or rehabilitation and/or new construction of rental housing units for homeless and special needs populations in conjunction with supportive services
- o Acquisition and/or rehabilitation and/or new construction of rental housing units that provides or will provide project-based rental assistance to eligible tenants

• Medium Priorities

- o Preservation of existing affordable rental housing stock through rehabilitation, acquisition, or other eligible assistance
- o Acquisition and/or rehabilitation and/or new construction to provide rental units for one and two-person households
- o Acquisition, and/or rehabilitation and/or new construction to provide rental units for elderly residents

Low Priorities

- 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
- o Funds used to create additional affordable rental housing units to assure no net loss of units as a result of demolition, conversions to homeownership, prepayment or voluntary termination of State or federally assisted mortgages.

The high and medium priorities encompass members of the protected classes that could potentially face housing discrimination: families, persons with disabilities, and the elderly. Residents eligible for assistance are also considered a high priority, but the State does not protect against source of income discrimination. Homeownership production, direct homeownership assistance, down payment assistance, and closing cost assistance are not considered priorities of the programs.

Low Income Housing Tax Credit Program and the Qualified Action Plan

RIHousing is responsible for administering the federal LIHTC program for the State. Guidelines for administering the program are outlined in the 2020 Qualified Action Plan, establishing the process and priorities for the allocation of LIHTCs. For 2020, LIHTC is expected to be the primary funding source for affordable rental development.

In accordance with federal criteria, there is a preference given to developments serving the lowest income residents, developments which commit to the longest period of affordable, and developments located in a qualified census tract (QCT). Developments in QCTs are only considered if a concerted community revitalization plan is in place to prevent exacerbating concentrations of poverty. Additional requirements and scoring include:

- Project location
- Housing needs characteristics
- Project characteristics
- Sponsor characteristics
- Tenant populations with special housing needs
- Public housing waitlists
- Tenant populations of individuals with children
- Projects intended for eventual tenant homeownership
- Energy efficiency of projects
- The historic nature of the project

State criteria is largely based on the priorities identified in the Consolidated Plan. The Consolidated Plan was updated in Spring 2020. Special attention is given to affordable rental housing and development in designated growth centers. These growth centers are intended to be a mix of commercial and residential uses with access to services, transit, and water and wastewater infrastructure. The total annual tax credit authority for Rhode Island in 2019 was \$3,166,875.

A Funding Committee will evaluate and score applications based on federal and state criteria. The committee may consist of senior staff and one or more representatives of the Board of Commissioners. Proposals are first reviewed to determine if it meets the Threshold Criteria. The Threshold Criteria include:

- Development team capacity based on development and operation experience with affordable housing within the past five years
- Financial feasibility for at least 15 years
- Marketability in terms of achieving a sustainable occupancy of 95% within 6 months of construction completion
- Readiness to proceed within 12 months of reservation of credits and be complete within 30 months of reservation
- Total development cost cap by not exceeding \$375,000 per unit; any proposal exceeding this cap will be ineligible for LIHTCs.

Upon meeting this threshold, the Funding Committee will then score projects based on a wide variety of criteria out of a total of 134 points. The QAP was reviewed to determine the presence of five tax credit allocation priorities meant to incentivize developers to create LIHTC developments in locations with lower poverty rates and higher opportunity through the scoring process. The five allocation priorities compose 54 points out of 134 total points possible and include:

- High-opportunity neighborhoods
- Access to amenities
- Approval by the community
- Furthering investment in blighted neighborhoods
- Avoiding concentrations of affordable housing

The remaining points are allocated to financial feasibility (65 points) and green building practices (15 points). Negative points are based on an applicant's inability to perform under a previous allocation of LIHTCs, primarily as it relates to financing.

High-opportunity neighborhoods refer to areas that are typically suitable for long-term growth with existing or planned infrastructure in the vicinity of quality schools and employment opportunities. The significance of locating LIHTC developments in high-opportunity areas is that these are also areas with lower poverty rates. Exercising fair housing choice means having the opportunity to move to another neighborhood that offers economic opportunity, proximity to the workplace, better schools, and a safer and more secure environment should a lower income household choose to move. Affirmative moves from R/ECAP areas to lower poverty areas of opportunity help to break down patterns of segregation.

Tying in with improve access to opportunities is **improving access to amenities**. This priority is also primarily under "Comprehensive Community Development" (CCD). CCD is a holistic strategy that recognizes that communities are complex systems that require investment in a wide variety of assets, including, but not limited to, housing, schools, businesses, and parks. A total of 9 points are offered for each of the following that improve community access to amenities:

- Development is within ½ mile of recreation, culture, and/or entertainment opportunities (1 point)
- Development is within ½ mile of RIPTA or MBTA public transit service or no or low-cost transportation services (1 point)
- Development is served by public water and utilities (1 point)
- Development is situated in an existing or proposed Growth Center or is within 1 mile of existing public infrastructure such as hospitals, schools, libraries, community center, etc. within the Urban Service Boundary (USB) or 2.5 miles for non-USB areas (3 points)
- Development has documented resident programs and/or partnerships with entities such as the YMCA, Boys and Girls Club, or After School Programs (1 point)
- Development incorporates space for the co-location of supportive housing services to residents (1 point)
- Development is within ½ mile of a business that sells fresh produce and food items year-round within the Urban Core and Urban Ring as defined by GrowSmartRI and 2.5 miles for non-Urban Ring areas (1 point)

- o Urban Core refers to the state's five historic cities: Central Falls, Newport, Pawtucket, Providence, and Woonsocket.
- o Urban Ring refers to five municipalities surrounding the urban core: Cranston, East Providence, North Providence, Warwick, and West Warwick

Community approval is important to ensure that existing residents do not see affordable housing developments as a burden. Local developers (1 point) and the use of local subcontractors (3 points) are given preference in order to create employment opportunities for Rhode Island's workforce. Additionally, the QAP incentivizes developers to engage the public through community meetings and to document community feedback (1 point), with additional preference given to community-based nonprofits with experience operating housing developments (1 point).

Vacant and blighted properties have a negative impact on the perception of neighborhoods and communities, being potential threats to health, safety, and public welfare. **Investing in blighted communities** can help revitalize or stabilize a neighborhood. According to the QAP, up to 5 points will be given to applicants that address vacant, foreclosed, and/or blighted properties or infill development on vacant or blighted neighborhood lots.

To avoid concentrating affordable housing developments together, preferential treatment for projects that are not located near other developments are often provided. The Rhode Island Comprehensive Housing Production and Rehabilitation Act of 2004 and Rhode Island Low and Moderate Income Housing Act (Rhode Island General Laws 45-53) requires that 10% of each municipalities' housing stock be "affordable." Ten communities are exempt from this requirement due to having a high percentage of rental and/or current affordable housing inventory. RIHousing incentivizes the development of affordable housing by giving applicants 10 points for locating developments within a community with less than 10% affordable housing and 5 points if the community is exempt. The ten exempt communities are:

- Central Falls
- Cranston
- East Providence
- Newport
- North Providence
- Pawtucket
- Providence
- Warwick
- West Warwick
- Woonsocket

Additionally, developments that have a range of income levels and at least 20% of the units are unrestricted can receive up to 4 points:

- 2 points 20% of the units are market rate
- 3 points up to 40% of the units are market rate
- 4 points more than 40% of the units are market rate

Finally, there are additional incentives to affirmatively further fair housing. Up to 6 points will be given to proposals that effectively serve people with income at or below 30% area median income, are homeless, or have special needs. Developments providing supportive services must partner with a service provider and demonstrate the proportion of units allocated to receiving supportive services, and will receive points based on the following criteria:

- 6 points 21% or greater of the total number of units in the development
- 4 points 11-20% of the total number of units in the development
- 2 points up to 10% of the total number of units in the development

A service plan and memorandum of understanding is required for homes intended for persons with special needs. Developments in which no supportive serves are provided receive up to 3 points:

- 3 points 21% or greater of the total number of units in the development
- 2 points 11-20% of the total number of units in the development
- 1 point up to 10% of the total number of units in the development

8. Fair Housing Profile

This section also includes a review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

Fair Housing Laws

The Fair Housing Act defines seven protect classes: race, color, religion, national origin, sex, disability, and familial status. The Rhode Island Fair Housing Practices Act also prohibits discrimination based on marital status, military status, conviction status, sexual orientation, age (18+), gender identity or expression, and being a victim of domestic abuse. It is also illegal to discriminate against someone because of their association with members of the protected class. As a result, Rhode Islanders have more protections under the State's fair housing law. While none of the Entitlements have their own local fair housing law, all of them except Pawtucket explicitly refer to the Rhode Island Fair Housing Practices Act in their local ordinances.

Fair Housing Complaints

Rhode Islanders can receive fair housing services from a variety of agencies such as RIHousing, the Rhode Island Commission for Human Rights, Rhode Island Legal Services, Rhode Island Center For Justice, the Housing Network of Rhode Island, and SouthCoast Fair Housing. These groups provide education and outreach, sponsor community events, process fair housing complaints, and in some cases investigate complaints through testing, and /or work to promote a mutual understanding of diversity among residents.

A lack of filed complaints does not necessarily indicate a lack of housing discrimination. Some persons may not file complaints because they are not aware of how to go about filing a complaint or where to go to file a complaint. In a tight rental market, tenants may want to avoid confrontations with prospective landlords. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

Office of Fair Housing & Equal Opportunity (HUD)

The Office of Fair Housing & Equal Opportunity (FHEO) at HUD receives complaints from persons regarding alleged violations of the federal Fair Housing Act. Fair housing complaints originating in Rhode Island were received beginning with filing dates starting in January 2015 through January 2020. During this time period, 331 cases were filed and 55 of these cases are still open. While geographic distribution of municipality was provided, It is important to note that substantial differences in size and demographic composition of cities and regions make comparisons difficult between; complaints over

time may be a more useful measure. Expectedly due to population size, Providence saw the largest number of complaints (29.0%) followed by Cranston (8.2%) and Pawtucket (7.9%). The number of cases vary between years, with 2019 seeing the largest number of filed cases.

Figure 91 FHEO Complaints by Location, 2015-2020

Originating Location	Cases Filed	% of Cases
Rhode Island	331	100.0%
Cranston	27	8.2%
East Providence	7	2.1%
Pawtucket	26	7.9%
Providence	96	29.0%
Warwick	20	6.0%
Woonsocket	21	6.3%
Remainder of State	155	46.8%

Source: Office of Fair Housing & Equal Opportunity, HUD

Figure 92 FHEO Complaints by Year, 2015-2019

Year Filed	Cases Filed
2015	60
2016	70
2017	64
2018	56
2019	79

Source: Office of Fair Housing & Equal Opportunity, HUD

Of the 331 cases filed, discrimination against disability status made up the majority of cases (59.5%), followed by retaliation (21.5%) and race (18.1%). Please note that many cases have multiple bases for alleged discrimination or split rulings; the sum of all bases will be larger than the number of processed cases. Of all closed cases, a relative majority of cases found no cause determination (44.6%) followed by conciliation or successful settlement (34.1%).

Figure 93 FHEO complaints by basis of alleged discrimination, 2015-2020

Basis of Complaint	#	%
Disability	197	59.5%
Retaliation	71	21.5%
Race	60	18.1%
Color	42	12.7%
Familial Status	39	11.8%
Sex	31	9.4%
National Origin	29	8.8%
Religion	4	1.2%

Source: Office of Fair Housing & Equal Opportunity, HUD

Figure 94 FHEO complaints by closure reason, 2015-2020

Closure Reason	#	%
No cause determination	123	44.6%
Conciliation/settlement successful	94	34.1%
Complaint withdrawn by complainant after resolution	22	8.0%
Complaint withdrawn by complainant without		
resolution	14	5.1%
FHAP judicial consent order	10	3.6%
Closed because trial has begun	4	1.4%
Unable to locate complainant	4	1.4%
Complainant failed to cooperate	2	0.7%
Administrative hearing ended - discrimination found	1	0.4%
Dismissed for lack of jurisdiction	1	0.4%
Not Selected	1	0.4%

Source: Office of Fair Housing & Equal Opportunity, HUD

Across all complaints filed with HUD, failure to make reasonable accommodation was the most cited issue, factoring into slightly less than half of all cases. Discrimination in terms, conditions, and privileges relating to rentals made up 39.3% of all cases. As with basis for discrimination, many cases had multiple issues. A breakdown of all issues cited in Rhode Island are listed in the following figure.

Figure 95 FHEO complaints by issue, 2015-2020

Issue	#	%
Failure to make reasonable accommodation	158	47.7%
Discrimination in terms/conditions/privileges relating to rental	130	39.3%
Other discriminatory acts	81	24.5%
Discriminatory refusal to rent	56	16.9%
Discriminatory terms, conditions, privileges, or services and facilities	53	16.0%
Discriminatory acts under Section 818 (coercion, Etc.)	32	9.7%
Otherwise deny or make housing unavailable	30	9.1%
Discriminatory refusal to negotiate for rental	19	5.7%
Discriminatory financing (includes real estate transactions)	17	5.1%
Discriminatory advertising, statements and notices	16	4.8%
Discriminatory refusal to rent and negotiate for rental	12	3.6%
Discrimination in services and facilities relating to rental	9	2.7%
Failure to permit reasonable modification	6	1.8%
Discrimination in the purchasing of loans	2	0.6%
Discrimination in terms and conditions of membership	1	0.3%
Discrimination in terms/conditions/privileges relating to sale	1	0.3%
Discriminatory refusal to negotiate for sale	1	0.3%
Failure to provide an accessible route into and thru the covered		
unit	1	0.3%
Restriction of choices relative to a rental	1	0.3%

Source: Office of Fair Housing & Equal Opportunity, HUD

Rhode Island Commission for Human Rights

The Rhode Island Commission for Human Rights (RICHR) provided data on all housing complaints filed in Rhode Island beginning with fiscal year 2015 through the current fiscal year 2020. During this period, 376 cases were received and 400 cases processed. Processed cases include cases that have been investigated and/or settled; they do not necessarily have to be closed. A higher or lower rate of case filings does not necessarily indicate more or less discrimination. The average case age at closure for RICHR between FY 2015 and FY 2020 was 142 days.

Data on the bases alleging discrimination were available beginning with fiscal year 2017. Of the 207 cases processed since 2017, 130 of cases alleged discrimination on the basis of disability (62.8%), followed by race (20.8%), color (16.9%), and retaliation (14.5%). Of the 400 processed cases between 2015 and 2020, 159 cases 39.8% of all processed cases) ended in negotiation settlements or were withdrawn with settlements reached prior to issuance of a finding of probable cause. Nineteen percent (19.0%) of cases were found to have probable cause while 39.5% of processed cases were to have no probable cause. Finally, six cases (4.5%) were issued a notice enabling the complainant to take the case to court. Cases categorized as Other either did not have a closure type provided or had unspecified split rulings between HUD FHEO and RICHR. The bases for all complaints and case dispositions are summarized in the tables below. Please note that many cases have multiple bases for alleged discrimination or split rulings; the sum of all bases will be larger than the number of processed cases.

Figure 96 RICHR complaints by basis of alleged discrimination, FY 2017-2020

	Number	Percent
Total	207	100.0%
Disability	130	62.8%
Race	43	20.8%
Color	35	16.9%
Retaliation	30	14.5%
Familial Status	21	10.1%
Ancestral Origin	20	9.7%
Sex	11	5.3%
Sexual Harassment	2	18.2%
Victims of Domestic Violence	7	3.4%
Age	5	2.4%
Gender ID/Expression	3	1.4%
Marital Status	2	1.0%
Religion	2	1.0%
Sexual Orientation	2	1.0%
Housing Status	1	0.5%
Military Status	1	0.5%

Source: Rhode Island Commission for Human Rights

Figure 97 Case Dispositions, FY 2015-2020

	Number	Percent
Total	400	100.0%
Negotiated settlement	130	32.5%
Probable cause	76	19.0%
No probable cause	158	39.5%
Withdrawn	23	5.8%
Withdrawn with settlement	29	7.3%
Right to sue	6	1.5%
Other	13	3.3%

Source: Rhode Island Commission for Human Rights

Other Findings Against Al Participants

The Cities of Cranston, East Providence, Pawtucket, Providence, Warwick and Woonsocket, none of these municipalities have any unresolved charges, findings, or determinations from a substantially equivalent state or local fair housing agency.

According to Cranston, East Providence, Pawtucket, Warwick and Woonsocket, none of these municipalities have received a letter or finding or lawsuit issued or filed by the U.S. Department of Justice alleging a pattern or practice or systemic violation of fair housing law.

According to Cranston, East Providence, Providence, Warwick and Woonsocket, none of these municipalities have received a claim under the federal False Claims Act related to fair housing, nondiscrimination or civil rights, generally, including an alleged failure to affirmatively further fair housing.

Fair Housing Education and Outreach

Rhode Island Commission for Human Rights is one of the oldest State agencies specializing in antidiscrimination law enforcement. All services and activities are provided free of charge and include:

- Education and outreach sessions on educating the public on the rights and responsibilities under State and federal laws related to discrimination. These sessions are available on request and have included schools, community organizations, employers, unions, and housing providers.
- Intake, investigation, and settlement of discrimination charges. The process of filing a charge is clearly outlined prefacing with the completion of an Intake Questionnaire. This questionnaire is available by phone and online.
- Administrative hearings

OHCD staffs the **State of Rhode Island Housing Resources Commission**. Their purpose is to ensure all Rhode Island residents have access to safe and affordable housing. Representing a wide range of constituents from various disciplines and sectors, the Commission holistically works to assure that residents have access to all aspects of quality housing. The Commission also maintains a landlord/tenant handbook detailing the rights and responsibility of landlords and tenants under federal and state law.

Rhode Island Legal Services (RILS) provides a full range of legal assistance. Notably, RILS provides community legal education and represents low-income residents with civil legal problems, including fair housing complaints.

The Rhode Island Center for Justice "partners with community groups to protect legal rights and to ensure justice for vulnerable individuals, families, and communities," by providing legal representation and strategy. Practice areas other than housing include immigration, workers' rights, criminal justice, education, and utility shutoffs. Working in partnership with Direct Action for Rights and Equality (DARE), the HOMES RI coalition, RILS, and SCFH, RI Center for Justice established a goal for fair housing issues

to reduce evictions, extend tenancies, and improve substandard housing conditions in 10% of cases filed through direct representation and policy changes.

The Housing Network of Rhode Island is the state association of nonprofit community development corporations focused on the development and building of affordable housing throughout the State. The Homeownership Connection program is the Housing Network's main program for promoting fair housing. The program provides tools and support in communities to achieve, maintain, and sustain homeownership. Coordination of administrative tasks like curriculum development, workbook production, central registration, data tracking, local and federal reporting, outreach/marketing, and program wide fundraising is conducted by the ten-member collaborative while community-based organizations offer classes and counseling directly in the neighborhood. These programs also promote awareness about fair housing issues

SouthCoast Fair Housing (SCFH) is a non-profit fair housing organization providing education, outreach, advocacy and enforcement services to eliminate housing discrimination and ensure equal access to housing in Rhode Island and nearby Bristol and Plymouth Counties in Massachusetts. Activities include:

- Assisting individuals with exercising their fair housing rights
- Investigate and identify discriminatory housing practices
- Advocate for policies that will further fair housing
- Perform fair housing outreach and educational activities.

SCFH provides internal review services of potential housing discrimination complaints and will assist individuals in filing an official complaint if a violation of the Fair Housing Act is found. Additionally, SCFH conducts fair housing testing and educational workshops for first-time homebuyers, landlords, and real estate agents.

Fair housing advocacy, education and outreach can also be found at the local level. Local promotion of fair housing in Entitlement communities include:

- Pawtucket Housing Authority making explicit the obligation landlords have to PHA and their tenants regarding non-discrimination and reasonable accommodation. PHA also makes clear tenant responsibilities and what to look out for to ensure they are being fairly treated.
- The City of Providence has a dedicated section on their website for their Fair Housing & Equal
 Opportunity Programs. Federal and local fair housing laws and the Affirmatively Furthering Fair
 Housing rule are clearly defined. Local contacts for filing discrimination complaints, financial
 assistance related to housing, and available limited English proficiency services are also
 included.
- The City of Warwick providing a link to the previous AI on the website of the Community Development Office, which serves to assist local nonprofits to meet the needs of LMI individuals and neighborhoods with CDBG funds. Activities include fixed-rate low interest loans for home repairs and lead hazard reduction to ensure Warwick residents have access to safe and decent housing and the Sewer Tie-in Grant Program to ensure properties are connected to the municipal sanitary sewer system. All applicants must make an appointment with the Office in order to ensure applicants are fully informed and have proper documentation.

• The City of Woonsocket advertises its HOME Program to support the provision of safe and affordable housing. The City makes clear it adheres to federal and state fair housing laws.

9. Fair Housing Impediments and Action Steps

The conditions that create or foster impediments to fair housing choice generally have existed for many years, in some cases, many decades. Actions required to resolve or eliminate those conditions could also require years or decades. The first step to eliminating barriers to housing choice for members of the protected classes is to identify effective actions that can be implemented by each entity participating in this Al.

In most cases, the impediments to fair housing choice identified in the previous AI for the State and Entitlements remain today and are, therefore, included in the 2020 AI update. However, progress has been achieved over the past five years toward removing some of the policy barriers that have restricted housing choice across Rhode Island. Although much work remains, the participating entities in this AI are committed to continuing their efforts to eliminate discriminatory actions and expand housing choice.

This section describes the impediments to fair housing choice that emerged from the data analysis, public engagement/outreach initiatives, and policy review discussed throughout the Al planning process. The impediments are the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in Rhode Island. Also included is a series of recommended actions which, if implemented, would work toward eliminating or resolving the impediments.

Impediments

The primary impediments to fair housing choice across Rhode Island are common to all AI participants and exist across jurisdictional boundaries, which implies a continuing need for collaboration at the regional level where resources can be pooled to share the costs—much the same way in which the cost for this State AI was shared. The primary impediments identified in the AI include the following:

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

Each of these impediments is discussed below.

Inadequate supply of affordable housing

Rhode Island's inventory of housing affordable to households up to 80% of AMI is significantly inadequate to meet the demand as evidenced by:

- Nearly half of these renters are paying more than 30% of their household income toward rent and utilities each month; slightly more than one in four homeowners are paying more than 50% on their housing costs
- With more than half of all housing built before 1960, the physical features of most older units are not accessible to persons with disabilities, contain lead-based paint and many are in substandard condition
- There is a concentration of assisted housing inventory in Providence (10,703 units), which was identified as having very low opportunity scores in education, labor force engagement, environmental health index and poverty; however, it ranked as one of the highest opportunity areas for transit. By comparison, Cranston and Warwick have the highest opportunity scores across all indices but include the smallest assisted housing inventories at 1,773 units and 2,017 units, respectively.

These trends impact members of the protected classes disproportionately as detailed in the Al demographic section, which, in part, contribute to the following adverse outcomes for protected classes:

- Persons with disabilities have lower rates of employment and lower earnings than people without disabilities
- Female-headed households with children live in poverty at much higher rates than maleheaded households with children and married couples with children
- Blacks and Hispanics are more likely to be unemployed than other groups
- Non-White households tend to be larger than White households, requiring larger housing units that cost more.

Inadequate level of public transportation

Outside of Providence, transportation costs are equal to more than 20% of a household's income; in Warwick, it's 24% of household income. For cost-burdened households, this means that monthly housing plus transportation costs eat up more than 50% of household income, leaving what remains to cover food, childcare, clothing, prescription drugs and other necessities. Lack of frequent transit service also limits employment options for households without vehicles. Being able to commute daily to a job using reliable transportation contributes to stable employment, which in turn, contributes to stable housing. Inadequate public transportation impacts members of the protected classes disproportionately for the same reasons stated above for affordable housing.

Public opposition to new affordable housing developments

Stakeholders reported that proposed new affordable housing developments in some communities draw opposition from nearby residents. Some oppose the density, others oppose the type of tenants, and others fear their property values will decline. Because members of the protected classes—families with children, people with disabilities, non-White households—are more likely to need affordable housing as detailed above, this becomes a fair housing issue that restricts housing choice if new development plans are denied based solely on public opposition.

Inadequate funding level

Throughout Rhode Island, there are extremely limited resources to finance affordable housing development and preservation. Federal funding from the Community Development Block Grant and HOME programs provided to RIHousing, OHCD and the six Entitlements are good resources but barely address demand. The LIHTC and HTF programs are also available but provide just over \$6 million annually. There is no dedicated funding stream at the State level to supplement these federal funds to raise production to a meaningful level.

Discriminatory behavior toward members of the protected classes

In addition to the challenge of searching for affordable and accessible housing conveniently located near public transportation, housing choice for many members of the protected classes is further restricted through discriminatory behavior. Landlords who refuse to rent to large families, or mixed-race families, or persons with disabilities make a challenging search even more difficult when illegal reasons are given for denying housing. Non-White mortgage applicants are denied at higher rates than White loan applicants. All these actions demonstrate the continuing need for fair housing education, outreach and enforcement. A well-informed citizenry who understands their rights under fair housing laws is better able to recognize housing discriminatory as illegal and knows there are local and regional entities that can assist in filing complaints, mediating resolutions and seeking redress, when appropriate.

Fair Housing Action Plans

The following charts include recommendations for each of the AI participants.

RIHousing and O Impediment	Actions	Measurable Benchmarks	Timeframe
Inadequate supply of affordable housing	Prioritize investment in higher opportunity areas that are not currently meeting affordable housing needs and in lower opportunity areas where development is a part of a broader community revitalization plan.	Increased housing development in high opportunity areas and as a part of broader neighborhood revitalization efforts.	2020-2021
	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	 a) Prepare plan outlining locations in growth / high opportunity areas, potential partners and funding resources two years before expiration of each development b) Prioritize preservation of developments with expiring affordability restrictions 	a) 2020-2021 b) 2020-2021
	Work toward reducing zoning barriers to affordable housing production	 a) Provide web-based and direct technical assistance to municipal and zoning officials to facilitate development activity and address local concerns. b) Draft model zoning language to foster 	a) 2020-2021b) 2021 and
		affordable housing development in partnership with OHCD and APA Rhode Island c) In partnership with OHCD and APA Rhode Island, provide technical assistance to municipalities for adopting new zoning provisions that promote the production of affordable housing and eliminate barriers to fair housing	beyond

		d) Look for opportunities to increase project-based vouchers and development in housing serving lowest income and special needs populations.	
	Address home repair and health and safety issues in older homes occupied by lower income households	Continue the lead abatement and accessibility CDBG housing rehabilitation programs. Provide funding for lead hazard mitigation program administered by the Dept. of Health. Capitalize on membership in Rhode Island Alliance for Healthy Homes to assist, where appropriate.	2020 and beyond
	Expand the Housing Choice Voucher Program to growth / opportunity areas	a) Continue to seek out landlords in growth / opportunity areas to participate in the program	a) 2020 and beyond
		 b) Explore establishing a State Landlord Risk Mitigation Fund for landlords renting to voucher holders c) Amend the RI Fair Housing Practices Act to add "source of lawful 	b) 2020 and beyondc) 2020 and beyond
		income" as a protected class	beyond
	Advise the Governor's Office on proposed amendments to the "10% affordable housing requirement" included in the Low and Moderate Income Housing Act (RIGL: 45-53)	Support the Governor's Office in evaluating amendment language	2020 and beyond
	Expand homeownership opportunities	Continue Downpayment Assistance Program	2020 and beyond
Inadequate level of public transportation	Encourage new multi- family rental production in TODs	Give priority in development financing programs to developments connected to transit or close to jobs and services	2020-2021
	Support expanded transit planning efforts	Continue to engage in the Transit Master Plan (Transit	2020 and beyond

Public opposition to new affordable housing development in some municipalities	Create an educational campaign on affordable housing as an economic development tool / incentive	Forward RI 2040) and other transportation planning initiatives by RIPTA, RIDOT, and Division of Statewide Planning Collaborate with Department of Commerce the business community to develop the materials	2021
	Enforce HUD's AFFH certification with sub-recipient units of government	Develop a policy for reviewing and making a determination as to whether a municipality that receives CDBG funds has complied with its obligation to affirmatively further fair housing and, if not, the subsequent consequences and opportunities to remedy.	2020 and beyond
	Provide State incentives to address concerns raised at the local level	Consider creating municipal incentives to offset local concerns about the cost of educating additional children, similar to 40S in Massachusetts	2021-2022
Inadequate funding level	Support efforts to secure a dedicated source of statewide funding for affordable housing production, either through the proposed real estate conveyance tax increase or an identified alternative	Continue to collaborate with the Executive Office of Commerce to support the Governor's 2020 proposal for a dedicated funding stream.	2020 and beyond
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other Al participants on statewide fair housing education, outreach and legislative efforts	 a) Sponsor regional fair housing trainings b) In partnership with RIHRC develop a fair housing webinar for local elected officials and appointed board and commission members c) Look for opportunities to increase project-based vouchers and development in housing serving lowest income 	a) 2021 and beyondb) 2021c) 2020 until achieved

and special needs
populations
d) Encourage shared d) 2020 and
jurisdiction of housing beyond
vouchers between PHAs
to provide greater
housing opportunities for
voucher recipients and
reduce delays in leasing
up vouchers at turnover
e) Refer cases to RI Legal e) 2020 and
Services and other beyond
resources, as appropriate
f) Update landlord/tenant f) 2021 and beyond
handbook and actively
share it with community
partners as well as tenants
and landlords

Impediment	Actions	Measurable Benchmarks	Timeframe		
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	a) Continue local partnerships to: • Create new affordable multifamily and singlefamily housing • Abate lead in older homes • Assist homebuyers with home purchases with home purchases • Rehabilitate existing owner-occupied homes b) Continue effective code enforcement among rental properties	2020 and beyond		
Work toward reducing zoning barriers to affordable and fair housing		Revise zoning ordinance to be consistent with Federal Fair Housing Act	2020-2021		
Public opposition to new affordable housing development	Create an educational campaign on affordable housing as an economic incentive	Collaborate with OHCD and the business community to develop the materials	2021		
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing education and outreach efforts	 a) Sponsor regional fair housing trainings b) Continue providing fair housing information in languages spoken by city residents c) Provide fair housing training to planning commission members 	a) 2021 and beyond b) 2020 and beyond c) 2020 and beyond		

CITY OF EAST PROVIDENCE						
Impediment	Actions	Measurable Benchmarks Timeframe				
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	a) Continue to abate lead in older homes b) Continue effective code enforcement among rental properties a) 2020 and beyond by 2020 and beyond				
	Work toward reducing zoning barriers to affordable and fair housing	Revise zoning ordinance to 2020-2021 be consistent with fair housing laws				
Public opposition to new affordable housing development	Create an educational campaign on affordable housing as an economic incentive	Collaborate with OHCD 2021 and the business community to develop the materials				
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing education and outreach	a) Sponsor regional fair housing trainings b) Continue providing fair housing education to a) 2021 and beyond b) 2020 and beyond				
	efforts	landlords c) Continue providing tenant and landlord training on wrongful evictions and landlord training on wrongful evictions				
		d) Provide fair housing d) 2020 and training to planning beyond commission members				

CITY OF PAWTUCKET						
Impediment	Actions	Measurable Benchmarks Timeframe				
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	a) Continue to abate lead in older homes beyond b) Continue effective code enforcement among rental properties a) 2020 and beyond				
	Work toward reducing zoning barriers to affordable and fair housing	Revise zoning ordinance 2020-2021 to be consistent with fair housing laws				
Public opposition to new affordable housing development	Create an educational campaign on affordable housing as an economic incentive	Collaborate with OHCD 2021 and the business community to develop the materials				
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing education and outreach	 a) Sponsor regional fair housing trainings b) Continue providing fair housing education to a) 2021 and beyond beyond 				
	efforts	landlords c) 2020 and c) Continue providing tenant training on wrongful				
		evictions d) Provide fair housing training to planning d) 2020 and beyond				
		commission members e) Continue fair housing beyond education to homebuyers with Central Falls				
		partnership f) 2020 and beyond language assistance to				
		persons with LEP g) Continue to implement the city's Section 504 g) 2020 and beyond				
		Transition Plan h) Continue working to diversify appointed h) 2020 and beyond				
		boards and commissions i) Provide fair housing beyond training to planning commission members				

Impediment	Actions	Measurable Benchmarks	Timeframe
Impediment			
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	a) Continue to abate lead in older homesb) Continue working with partners to prevent lead poisoning in older homes	a) 2020 and beyondb) 2020 and beyond
		c) Continue effective code enforcement among rental properties	c) 2020 and beyond
		d) Continue Home Repair program to address health and safety issues	d) 2020 and beyond
		e) Continue use of ViewPoint to ensure an efficient permitting system	e) 2020 and beyond
		f) Continue new housing development initiatives, expanding to areas outside of R/ECAPs with city's Housing Trust Fund	f) 2020 and beyond
		g) Continue partnership with HNRI for homebuyer program	g) 2020 and beyond
		h) Complete the Comprehensive Plan with a strong focus on affordable housing and housing preservation	h) 2020 and beyond
	Work toward reducing zoning barriers to affordable and fair housing	Revise zoning ordinance to improve consistency with fair housing laws as outlined on page 186.	2020-2021
Inadequate level of public transportation	Enhance public transit service and facilities	a) In partnership with RIPTA, implement TIGER grant initiatives	a) 2020 through completion
		b) Continue JUMP Bike Share and e-Scooter programs as transit options	b) 2020 and beyond
		c) Continue implementation of the city's new Great Streets Master Plan	c) 2020 through completion
		d) Continue partnerships for implementing autonomous	d) 2020 and beyond

			shuttle service to cover transit system gaps		
Discriminatory behavior	Continue to collaborate	a)	Sponsor regional fair	a)	2021 and
toward members of the	with other AI participants		housing trainings		beyond
protected classes	on statewide fair housing	b)	Continue providing fair	b)	2020 and
	education and outreach efforts		housing education to landlords		beyond
		C)	Continue providing tenant	C)	2020 and
			training on wrongful evictions		beyond
		d)	Provide fair housing training	d)	2020 and
			to planning commission members		beyond
		e)	Continue fair housing	e)	2020 and
			education to homebuyers		beyond
		f)	Continue multi-lingual	f)	2020 and
			webpages		beyond
		g)	Continue partnership with	g)	2020 and
			RWU Law Clinic and RI		beyond
			Center for Justice to secure		
			fair housing rights for		
			tenants Implement no-cost Right-		2020 and
		h)			
			to-Counsel pilot program		beyond
			for tenants at risk of eviction		

CITY OF WARWICK						
Impediment	Actions	Measurable Benchmarks	Timeframe			
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	 a) Continue to abate lead in older homes b) Continue effective code enforcement among rental properties 	a) 2020 and beyond b) 2020 and beyond			
		c) Continue conversion of REO/foreclosed properties to affordable housing	c) 2020 and beyond			
		d) Continue providing funding for implementation of neighborhood master plans	d) 2020 and beyond			
		e) Continue partnerships to modify units with accessibility features for person with disabilities	e) 2020 and beyond			
	Work toward reducing zoning barriers to affordable and fair housing	Revise zoning ordinance to be consistent with fair housing laws	2020-2021			
Public opposition to new affordable housing development	Create an educational campaign on affordable housing as an economic incentive	Collaborate with OHCD and the business community to develop the materials	2021			
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing	a) Sponsor regional fair housing trainings b) Continue providing fair	a) 2021 and beyondb) 2020 and beyond			
	education and outreach efforts	housing education to landlords c) Provide fair housing training to planning	c) 2020 and beyond			
		commission members d) Continue providing language assistance to	d) 2020 and beyond			
		persons with LEP e) Continue working to diversify appointed boards and commissions	e) 2020 and beyond			

CITY OF WOONSOCKET						
Impediment	Actions	Measurable Benchmarks	Timeframe			
Inadequate supply of affordable housing	Expand affordable, accessible and healthy housing units	 a) Continue to abate lead in older homes b) Continue effective code enforcement among rental properties c) Continue conversion of REO/foreclosed properties to affordable housing d) Continue providing funding for 	 a) 2020 and beyond b) 2020 and beyond c) 2020 and beyond d) 2020 and beyond 			
	Work toward reducing zoning barriers to affordable and fair housing	implementation of neighborhood master plans e) Continue partnerships to modify units with accessibility features for person with disabilities Revise zoning ordinance to be consistent with fair housing laws	e) 2020 and beyond			
Public opposition to new affordable housing development	Create an educational campaign on affordable housing as an economic incentive	Collaborate with OHCD and the business community to develop the materials	2021			
Discriminatory behavior toward members of the protected classes	Continue to collaborate with other AI participants on statewide fair housing education and outreach efforts	 a) Sponsor regional fair housing trainings b) Continue providing fair housing education to landlords 	a) 2021 and beyond b) 2020 and beyond			
		c) Provide fair housing training to planning commission members	c) 2020 and beyond			
		d) Continue providing language assistance to persons with LEP	d) 2020 and beyond			
		e) Continue working to diversify appointed boards and commissions	e) 2020 and beyond			

10. Appendix A: Supplemental Tables

Figure 98 Rhode Island Population, 2000 - 2017

rigure 30 Kriode isia	Year	Total Population	Change
	2000	1,048,319	
Rhode Island	2010	1,052,567	0.4%
	2017	1,056,138	0.3%
	2000	79,269	-
Cranston	2010	80,387	1.4%
	2017	80,979	0.7%
	2000	48,688	-
East Providence	2010	47,037	-3.4%
	2017	47,425	0.8%
	2000	72,958	_
Pawtucket	2010	71,148	-2.5%
	2017	71,770	0.9%
	2000	173,618	-
Providence	2010	178,042	2.5%
	2017	179,509	0.8%
	2000	85,808	-
Warwick	2010	82,672	-3.7%
	2017	81,218	-1.8%
	2000	43,224	-
Woonsocket	2010	41,186	-4.7%
	2017	41,508	0.8%
	2000	544,754	-
Remainder of State	2010	552,095	1.3%
	2017	553,729	0.3%

Figure 99 Rhode Island, Race and Ethnicity, 2000 – 2017

rigure 99 kilode Island, ka	2000 2010		2017	Percent Change 2000-2017		
Rhode Island						
White	891,191	856,869	854,801	-4.1%		
Black	46,908	60,189	68,346	45.7%		
Asian	23,665	30,457	35,556	50.2%		
Multi-Racial	28,251	34,787	31,296	10.8%		
Other	58,304	70,265	66,139	13.4%		
Hispanic	90,820	130,655	153,910	69.5%		
Cranston		,				
White	70,703	65,858	65,646	-7.2%		
Black	2,926	4,226	4,564	56.0%		
Asian	2,599	4,156	4,678	80.0%		
Multi-Racial	1,244	2,142	2,868	130.5%		
Other	1,797	4,005	3,223	79.4%		
Hispanic	3,613	8,709	11,263	211.7%		
East Providence						
White	42,111	39,525	38,871	-7.7%		
Black	2,445	2,709	3,176	29.9%		
Asian	559	714	1,563	179.6%		
Multi-Racial	1,964	1,991	2,387	21.5%		
Other	1,609	2,098	1,428	-11.2%		
Hispanic	922	1,913	2,518	173.1%		
Pawtucket						
White	55,004	47,289	44,597	-18.9%		
Black	5,334	9,534	13,291	149.2%		
Asian	621	1,073	1,267	104.0%		
Multi-Racial	3,899	4,330	3,845	-1.4%		
Other	8,100	8,922	8,770	8.3%		
Hispanic	10,141	14,042	17,356	71.1%		
Providence						
White	94,666	88,623	95,040	0.4%		
Black	25,243	28,557	28,069	11.2%		
Asian	10,432	11,380	11,213	7.5%		
Multi-Racial	10,555	11,626	7,526	-28.7%		
Other	32,722	37,856	37,661	15.1%		
Hispanic	52,146	67,835	75,392	44.6%		
Warwick						
White	81,695	76,643	74,387	-8.9%		
Black	996	1,387	986	-1.0%		
Asian	1,281	1,864	2,252	75.8%		
Multi-Racial	1,102	1,611	2,035	84.7%		

	2000	2010	2017	Percent Change 2000-2017
Other	734	1,167	1,558	112.3%
Hispanic	1,372	2,827	4,338	216.2%
Woonsocket				
White	35,935	32,011	32,207	-10.4%
Black	1,920	2,621	3,564	85.6%
Asian	1,755	2,240	3,017	71.9%
Multi-Racial	1,359	1,781	1,450	6.7%
Other	2,255	2,533	1,270	-43.7%
Hispanic	4,030	5,845	7,198	78.6%
Remainder of State				
White	511,077	506,920	504,053	-1.4%
Black	8,044	11,155	14,696	82.7%
Asian	6,418	9,030	11,566	80.2%
Multi-Racial	8,128	11,306	11,185	37.6%
Other	11,087	13,684	12,229	10.3%
Hispanic	18,596	29,484	35,845	92.8%

Figure 100 Disability Status and Disability Type by Age for Rhode Island, Cranston, East Providence, and Pawtucket, 2017

	Rhode Islar	nd	Cransto	on	East Provid	dence	Pawtuc	ket
	Total	Percent	Total	Percent	Total	Percent	Total	Percent
Total Population	1,040,523	-	77,377	-	46,633	-	71,386	-
With a disability	138,199	13.3%	9,037	11.7%	7,037	15.1%	10,916	15.3%
With a hearing difficulty	37,560	27.2%	2,430	26.9%	1,818	25.8%	2,905	26.6%
With a vision difficulty	22,016	15.9%	1,395	15.4%	1,147	16.3%	1,746	16.0%
With a cognitive difficulty	57,734	41.8%	3,414	37.8%	3,059	43.5%	4,992	45.7%
With an ambulatory difficulty	69,178	50.1%	5,047	55.8%	3,623	51.5%	5,320	48.7%
With a self-care difficulty	29,020	21.0%	2,829	31.3%	1,607	22.8%	2,102	19.3%
With an independent living difficulty	50,769	36.7%	3,756	41.6%	2,679	38.1%	3,824	35.0%
Population Under 18 Years	155,620	15.0%	11,292	14.6%	6,082	13.0%	11,216	15.7%
With a disability	10,661	6.9%	567	5.0%	459	7.5%	921	8.2%
With a hearing difficulty	1,389	13.0%	53	9.3%	88	19.2%	107	11.6%
With a vision difficulty	1,536	14.4%	99	17.5%	89	19.4%	119	12.9%
With a cognitive difficulty	8,459	79.3%	385	67.9%	342	74.5%	752	81.7%
With an ambulatory difficulty	1,240	11.6%	69	12.2%	94	20.5%	96	10.4%
With a self-care difficulty	2,242	21.0%	125	22.0%	253	55.1%	203	22.0%
With an independent living difficulty	-	-	-	-	-	-	-	-
Population 18 to 64 Years	667,312	64.1%	48,270	62.4%	29,995	64.3%	46,598	65.3%
With a disability	72,389	10.8%	4,153	8.6%	3,549	11.8%	6,642	14.3%
With a hearing difficulty	13,222	18.3%	580	14.0%	585	16.5%	1,329	20.0%
With a vision difficulty	11,450	15.8%	711	17.1%	686	19.3%	935	14.1%
With a cognitive difficulty	35,700	49.3%	1,997	48.1%	1,831	51.6%	3,422	51.5%
With an ambulatory difficulty	33,606	46.4%	1,923	46.3%	1,863	52.5%	3,160	47.6%
With a self-care difficulty	13,785	19.0%	1,187	28.6%	682	19.2%	1,179	17.8%
With an independent living difficulty	27,147	37.5%	1,733	41.7%	1,212	34.2%	2,471	37.2%
Population 65 years and Older	163,029	15.7%	13,076	16.9%	8,255	17.7%	8,665	12.1%
With a disability	55,149	33.8%	4,317	33.0%	3,029	36.7%	3,353	38.7%

	Rhode Island		Cransto	on	East Providence		Pawtucket	
	Total	Percent	Total	Percent	Total	Percent	Total	Percent
With a hearing difficulty	22,949	41.6%	1,797	41.6%	1,145	37.8%	1,469	43.8%
With a vision difficulty	9,030	16.4%	585	13.6%	372	12.3%	692	20.6%
With a cognitive difficulty	13,575	24.6%	1,032	23.9%	886	29.3%	818	24.4%
With an ambulatory difficulty	34,332	62.3%	3,055	70.8%	1,666	55.0%	2,064	61.6%
With a self-care difficulty	12,993	23.6%	1,517	35.1%	672	22.2%	720	21.5%
With an independent living difficulty	23,622	42.8%	2,023	46.9%	1,467	48.4%	1,353	40.4%

Figure 101 Disability Status and Disability Type by Age for Providence, Warwick, Woonsocket, and Remainder of the State, 2017

	Providence		Warwi	ck	Woonsocket		Remainder of State	
	Total	Percent	Total	Percent	Total	Percent	Total	Percent
Total Population	178,181	-	80,656	-	40,877	-	545,413	-
With a disability	22,613	12.7%	12,872	16.0%	7,432	18.2%	68,292	12.5%
With a hearing difficulty	4,775	21.1%	4,117	32.0%	1,719	23.1%	19,796	29.0%
With a vision difficulty	4,107	18.2%	2,196	17.1%	870	11.7%	10,555	15.5%
With a cognitive difficulty	11,700	51.7%	4,863	37.8%	3,049	41.0%	26,657	39.0%
With an ambulatory difficulty	11,129	49.2%	6,063	47.1%	4,325	58.2%	33,671	49.3%
With a self-care difficulty	5,984	26.5%	2,013	15.6%	1,191	16.0%	13,294	19.5%
With an independent living difficulty	8,721	38.6%	4,505	35.0%	2,549	34.3%	24,735	36.2%
Population Under 18 Years	29,277	16.4%	10,211	12.7%	6,297	15.4%	81,245	14.9%
With a disability	2,434	8.3%	1,110	10.9%	655	10.4%	4,515	5.6%
With a hearing difficulty	273	11.2%	164	14.8%	18	2.7%	686	15.2%
With a vision difficulty	161	6.6%	275	24.8%	72	11.0%	721	16.0%
With a cognitive difficulty	2,068	85.0%	818	73.7%	522	79.7%	3,572	79.1%
With an ambulatory difficulty	332	13.6%	171	15.4%	141	21.5%	337	7.5%
With a self-care difficulty	597	24.5%	207	18.6%	114	17.4%	743	16.5%
With an independent living difficulty	-	-	-	-	-	-	-	-

	Providence		Warwi	ck	Woonsocket		Remainder of State	
	Total	Percent	Total	Percent	Total	Percent	Total	Percent
Population 18 to 64 Years	121,225	68.0%	51,019	63.3%	26,761	65.5%	343,444	63.0%
With a disability	13,817	11.4%	6,423	12.6%	4,617	17.3%	33,188	9.7%
With a hearing difficulty	2,387	17.3%	1,391	21.7%	799	17.3%	6,151	18.5%
With a vision difficulty	2,721	19.7%	913	14.2%	439	9.5%	5,045	15.2%
With a cognitive difficulty	7,442	53.9%	3,041	47.3%	2,101	45.5%	15,866	47.8%
With an ambulatory difficulty	6,418	46.5%	2,980	46.4%	2,568	55.6%	14,694	44.3%
With a self-care difficulty	3,249	23.5%	858	13.4%	630	13.6%	6,000	18.1%
With an independent living difficulty	5,254	38.0%	2,350	36.6%	1,562	33.8%	12,565	37.9%
Population 65 years and Older	16,391	9.2%	15,240	18.9%	5,243	12.8%	96,159	17.6%
With a disability	6,362	38.8%	5,339	35.0%	2,160	41.2%	30,589	31.8%
With a hearing difficulty	2,115	33.2%	2,562	48.0%	902	41.8%	12,959	42.4%
With a vision difficulty	1,225	19.3%	1,008	18.9%	359	16.6%	4,789	15.7%
With a cognitive difficulty	2,190	34.4%	1,004	18.8%	426	19.7%	7,219	23.6%
With an ambulatory difficulty	4,379	68.8%	2,912	54.5%	1,616	74.8%	18,640	60.9%
With a self-care difficulty	2,138	33.6%	948	17.8%	447	20.7%	6,551	21.4%
With an independent living difficulty	3,467	54.5%	2,155	40.4%	987	45.7%	12,170	39.8%

Figure 102 Disability Status and Labor Force Engagement, 2017

	Total		With a dis	ability	Without a d	isability
	#	%	#	%	#	%
Rhode Island						
In Labor Force	526,608	78.9%	34687	45.8%	491921	83.2%
Employed	495,755	74.3%	30787	40.6%	464968	78.6%
Unemployed	30,853	4.6%	3900	5.1%	26953	4.6%
Not in the Labor Force	140,775	21.1%	41119	54.2%	99656	16.8%
Total	667,383		75,806		591,577	
Cranston						
In Labor Force	36,404	78.6%	1982	49.7%	34422	81.3%
Employed	34,933	75.4%	1922	48.2%	33011	78.0%
Unemployed	1,471	3.2%	60	1.5%	1411	3.3%
Not in the Labor Force	9,925	21.4%	2009	50.3%	7916	18.7%
Total	46,329		3,991		42,338	
Pawtucket						
In Labor Force	37,406	79.5%	3763	44.7%	33643	87.1%
Employed	34,886	74.1%	3392	40.3%	31494	81.5%
Unemployed	2,520	5.4%	371	4.4%	2149	5.6%
Not in the Labor Force	9,662	20.5%	4663	55.3%	4999	12.9%
Total	47,068		8,426		38,642	
Providence						
In Labor Force	86,076	72.8%	5889	40.1%	80187	77.4%
Employed	79,624	67.3%	5143	35.0%	74481	71.9%
Unemployed	6,452	5.5%	746	5.1%	5706	5.5%
Not in the Labor Force	32,207	27.2%	8790	59.9%	23417	22.6%
Total	118,283		14,679		103,604	
Warwick						
In Labor Force	42,249	83.4%	4435	60.6%	37814	87.2%
Employed	40,370	79.7%	4072	55.6%	36298	83.7%
Unemployed	1,879	3.7%	363	5.0%	1516	3.5%
Not in the Labor Force	8,426	16.6%	2888	39.4%	5538	12.8%
Total	50,675		7,323		43,352	
Remainder of State						
In Labor Force	324,473	80.1%	18,618	45.0%	305,855	84.1%
Employed	305,942	75.5%	16,258	39.3%	289,684	79.7%
Unemployed	18,531	4.6%	2,360	5.7%	16,171	4.4%
Not in the Labor Force	80,555	19.9%	22,769	55.0%	57,786	15.9%
Total	405,028		41,387		363,641	

Figure 103 Disability Status, Labor Force Participation and Poverty for Rhode Island, Cranston, East Providence and Pawtucket, 2017

	Rhode Is	land	Cranston		East Provic	lence	Pawtucket	
	#	%	#	%	#	%	#	%
Total Population (>18 years)	632,023		45,636		28,286		42,928	
With a disability	67,626	10.7%	3,977	8.7%	3,295	11.6%	6,154	14.3%
In Labor Force	25,615	37.7%	1,472	37.0%	1,211	36.8%	2,094	34.0%
In poverty	4,254	16.6%	119	8.1%	236	19.5%	539	25.7%
Not in Labor Force	42,240	62.3%	2,505	63.0%	2,084	63.2%	4,060	66.0%
In poverty	15,335	36.3%	668	26.7%	739	35.5%	1,489	36.7%
Without a disability	564,168	89.3%	41,659	91.3%	24,991	88.4%	36,774	85.7%
In Labor Force	464,403	82.3%	35,019	84.1%	21,496	86.0%	31,420	85.4%
In poverty	33,695	7.3%	2,076	5.9%	1,202	5.6%	3,637	11.6%
Not in Labor Force	99,765	17.7%	6,640	15.9%	3,495	14.0%	5,354	14.6%
In poverty	24,400	24.5%	1,172	17.7%	884	25.3%	1,739	32.5%

Figure 104 Disability Status, Labor Force Participation and Poverty for Providence, Warwick, Woonsocket, and the remainder of Rhode Island, 2017

	Provide	nce	Warwick		Woonsocket		Remainder of State	
	#	%	#	%	#	%	#	%
Total Population (>18 years)	112,912		48,562		25,089		935,436	
With a disability	12,778	11.3%	5,910	12.2%	4,327	17.2%	104,296	11.1%
In Labor Force	3,856	30.2%	2,942	49.8%	1,062	24.5%	38,252	36.7%
In poverty	1,007	26.1%	473	16.1%	264	24.9%	6,892	18.0%
Not in Labor Force	8,922	69.8%	2,968	50.2%	3,265	75.5%	66,044	63.3%
In poverty	4,128	46.3%	764	25.7%	1,536	47.0%	24,659	37.3%
Without a disability	100,134	88.7%	42,652	87.8%	20,762	82.8%	831,140	88.9%
In Labor Force	74,533	74.4%	37,388	87.7%	16,360	78.8%	680,619	81.9%
In poverty	11,234	15.1%	1,381	3.7%	1,782	10.9%	55,007	8.1%
Not in Labor Force	25,601	25.6%	5,264	12.3%	4,402	21.2%	150,521	18.1%
In poverty	9,344	36.5%	646	12.3%	1,922	43.7%	40,107	26.6%

Figure 105 Rhode Island Household Composition, 2010 - 2017

	20	10	20	17	Change from	m 2010 - 2017	
	Number	Percent	Number	Percent	Number	Percent	
		R	hode Island				
Family Households	259,561	62.80%	258,300	62.70%	-1261	-0.50%	
Married Couples	183,904	44.46%	183,627	44.57%	-277	-0.20%	
with children	72,675	39.52%	68,898	37.52%	-3777	-5.20%	
Single female	55,963	13.53%	55,788	13.54%	-175	-0.30%	
Single male	19,694	4.76%	18,885	4.58%	-809	-4.10%	
Non-Family	154,039	37.20%	153,728	37.30%	-311	-0.20%	
Living Alone	122,488	29.62%	126,011	30.58%	3523	2.90%	
Other Non-Family	31,551	7.63%	27,717	6.73%	-3834	-12.20%	
Total Households	413,600	100.00%	412,028	100.00%	-1572	-0.40%	
			Cranston				
Family Households	19,953	64.30%	19,738	64.70%	-215	-1.10%	
Married Couples	14,315	46.16%	14,014	45.92%	-301	-2.10%	
with children	5,808	40.57%	5,559	39.67%	-249	-4.30%	
Single female	4,221	13.61%	4,030	13.21%	-191	-4.50%	
Single male	1,417	4.57%	1,694	5.55%	277	19.50%	
Non-Family	11,059	35.70%	10,777	35.30%	-282	-2.50%	
Living Alone	9,177	29.59%	9,332	30.58%	155	1.70%	
Other Non-Family	1,882	6.07%	1,445	4.74%	-437	-23.20%	
Total Households	31,012	100.00%	30,515	100.00%	-497	-1.60%	
		Eas	t Providenc	е			
Family Households	12,189	60.30%	12,385	62.20%	196	1.60%	
Married Couples	8,532	42.24%	8,134	40.85%	-398	-4.70%	
with children	3,032	35.54%	2,476	30.44%	-556	-18.30%	
Single female	2,749	13.61%	3,500	17.58%	751	27.30%	
Single male	908	4.49%	751	3.77%	-157	-17.30%	
Non-Family	8,012	39.70%	7,528	37.80%	-484	-6.00%	
Living Alone	6,711	33.22%	6,580	33.04%	-131	-2.00%	
Other Non-Family	1,301	6.44%	948	4.76%	-353	-27.10%	
Total Households	20,201	100.00%	19,913	100.00%	-288	-1.40%	
Pawtucket							
Family Households	17,703	61.00%	17,022	61.60%	-681	-3.80%	
Married Couples	10,380	35.77%	9,712	35.14%	-668	-6.40%	
with children	4,173	40.20%	3,495	35.99%	-678	-16.20%	
Single female	5,494	18.93%	5,417	19.60%	-77	-1.40%	
Single male	1,829	6.30%	1,893	6.85%	64	3.50%	
Non-Family	11,319	39.00%	10,613	38.40%	-706	-6.20%	
Living Alone	9,189	31.66%	8,867	32.09%	-322	-3.50%	

	20	10	20	17	Change fror	n 2010 - 2017
	Number	Percent	Number	Percent	Number	Percent
Other Non-Family	2,130	7.34%	1,746	6.32%	-384	-18.00%
Total Households	29,022	100.00%	27,635	100.00%	-1387	-4.80%
		F	Providence			
Family Households	35,261	56.20%	35,491	57.20%	230	0.70%
Married Couples	18,271	29.13%	19,257	31.03%	986	5.40%
with children	8,856	48.47%	9,348	48.54%	492	5.60%
Single female	13,066	20.83%	12,659	20.40%	-407	-3.10%
Single male	3,924	6.26%	3,575	5.76%	-349	-8.90%
Non-Family	27,457	43.80%	26,566	42.80%	-891	-3.20%
Living Alone	19,870	31.68%	20,179	32.52%	309	1.60%
Other Non-Family	7,587	12.10%	6,387	10.29%	-1200	-15.80%
Total Households	62,718	100.00%	62,057	100.00%	-661	-1.10%
			Warwick			
Family Households	21,495	61.00%	21,692	62.10%	197	0.90%
Married Couples	16,109	45.72%	16,841	48.25%	732	4.50%
with children	5,921	36.76%	5,960	35.39%	39	0.70%
Single female	3,848	10.92%	3,399	9.74%	-449	-11.70%
Single male	1,538	4.37%	1,452	4.16%	-86	-5.60%
Non-Family	13,739	39.00%	13,212	37.90%	-527	-3.80%
Living Alone	11,188	31.75%	10,849	31.08%	-339	-3.00%
Other Non-Family	2,551	7.24%	2,363	6.77%	-188	-7.40%
Total Households	35,234	100.00%	34,904	100.00%	-330	-0.90%
		٧	Voonsocket			
Family Households	10,008	58.70%	9,738	57.10%	-270	-2.70%
Married Couples	5,977	35.03%	5,634	33.04%	-343	-5.70%
with children	2,226	37.24%	1,940	34.43%	-286	-12.80%
Single female	3,030	17.76%	2,986	17.51%	-44	-1.50%
Single male	1,001	5.87%	1,118	6.56%	117	11.70%
Non-Family	7,054	41.30%	7,316	42.90%	262	3.70%
Living Alone	5,700	33.41%	6,180	36.24%	480	8.40%
Other Non-Family	1,354	7.94%	1,136	6.66%	-218	-16.10%
Total Households	17,062	100.00%	17,054	100.00%	-8	0.00%
		Rem	ainder of Sta	ate		
Family Households	142,952	65.50%	142,234	64.70%	-718	-0.50%
Married Couples	110,320	50.52%	110,035	50.03%	-285	-0.30%
with children	42,659	38.67%	40,120	36.46%	-2539	-6.00%
Single female	23,555	10.79%	23,797	10.82%	242	1.00%
Single male	9,077	4.16%	8,402	3.82%	-675	-7.40%
Non-Family	75,399	34.50%	77,716	35.30%	2317	3.10%

	20	10	2017		Change from 2010 - 2017		
	Number	Percent	Number	Percent	Number	Percent	
Living Alone	60,653	27.78%	64,024	29.11%	3371	5.60%	
Other Non-Family	14,746	6.75%	13,692	6.23%	-1054	-7.10%	
Total Households	218,351	100.00%	219,950	100.00%	1599	0.70%	

Figure 106 Rhode Island Household Income by Race/Ethnicity, 2010 - 2017

rigure 100 kilode isiana r		Househ			
		2010			Percent Change
	(adj to	2017		2010-2017
	2	2017\$)			
Rhode Island					
White	\$	66,236	\$	65,182	-1.6%
Black	\$	39,006	\$	38,368	-1.6%
Asian	\$	59,979	\$	69,090	15.2%
Hispanic	\$	37,859	\$	34,514	-8.8%
Overall	\$	61,716	\$	61,043	-1.1%
Cranston					
White	\$	67,388	\$	65,572	-2.7%
Black	\$	47,059	\$	70,087	48.9%
Asian	\$	57,741	\$	55,278	-4.3%
Hispanic	\$	51,808	\$	49,280	-4.9%
Overall	\$	65,111	\$	64,282	-1.3%
East Providence					
White	\$	57,181	\$	56,323	-1.5%
Black	\$	58,355	\$	40,179	-31.1%
Asian	\$	60,690	\$	69,312	14.2%
Hispanic	\$	47,072	\$	31,500	-33.1%
Overall	\$	56,564	\$	54,707	-3.3%
Pawtucket					
White	\$	50,242	\$	47,375	-5.7%
Black	\$	32,390	\$	42,096	30.0%
Asian	\$	51,288	\$	66,281	29.2%
Hispanic	\$	33,386	\$	34,524	3.4%
Overall	\$	45,187	\$	44,909	-0.6%
Providence	\$	1			
White	\$	49,444	\$	47,094	-4.8%
Black	\$	36,406	\$	33,501	-8.0%
Asian	\$	43,196	\$	48,849	13.1%
Hispanic	\$	33,238	\$	30,227	-9.1%
Overall	\$	41,508	\$	40,366	-2.8%
Warwick					

	Househ			
	2010 (adj to 2017\$)	2017		Percent Change 2010-2017
White	\$ 67,583	\$	71,396	5.6%
Black	\$ 49,180	\$	65,700	33.6%
Asian	\$ 60,910	\$	95,357	56.6%
Hispanic	\$ 66,435	\$	71,944	8.3%
Overall	\$ 66,881	\$	71,191	6.4%
Woonsocket				
White	\$ 45,105	\$	38,989	-13.6%
Black	\$ 26,756	\$	32,412	21.1%
Asian	\$ 76,714	\$	71,480	-6.8%
Hispanic	\$ 26,648	\$	24,085	-9.6%
Overall	\$ 43,419	\$	38,340	-11.7%

Figure 107 Unemployment Rates by Sex and Race/Ethnicity, 2017

	Total Labor Force	Unemployed Individuals	Percent Unemployed						
Rhode Island									
By Sex									
Male	314,944	20,156	6.4%						
Female	325,095	20,481	6.3%						
	By Race	/ Ethnicity							
White	721,794	44,029	6.1%						
Black	51,913	5,659	10.9%						
Asian	29,199	1,548	5.3%						
Hispanic	109,073	12,216	11.2%						
Cranston									
	,		By Sex						
Male	25,046	1,703	6.8%						
Female	24,452	1,540	6.3%						
	By Race	/ Ethnicity							
White	55,254	3,813	6.9%						
Black	3,688	306	8.3%						
Asian	3,825	107	2.8%						
Hispanic	8,078	444	5.5%						
East Providence									
	By Sex								
Male	14,337	946	6.6%						
Female	15,063	1,024	6.8%						
	By Race	/ Ethnicity							

	Total Labor Force	Unemployed Individuals	Percent Unemployed
White	33,474	2,042	6.1%
Black	2,483	402	16.2%
Asian	1,251	149	11.9%
Hispanic	1,692	19	1.1%
Pawtucket			
	Ву	Sex	
Male	22,541	2,164	9.6%
Female	22,431	1,862	8.3%
	By Race	/ Ethnicity	
White	37794	3,893	10.3%
Black	9,672	987	10.2%
Asian	1,029	23	2.2%
Hispanic	12,461	1,745	14.0%
Providence			
	Ву	Sex	
Male	54,613	4,205	7.7%
Female	57,045	6,218	10.9%
	By Race	/ Ethnicity	
White	80,132	6,090	7.6%
Black	21,547	2,521	11.7%
Asian	9,679	707	7.3%
Hispanic	53,659	7,512	14.0%
Warwick			
	Ву	Sex	
Male	24,468	1,370	5.6%
Female	25,273	1,365	5.4%
	1	/ Ethnicity	
White	63,314	3,736	5.9%
Black	921	0	0.0%
Asian	1,845	120	6.5%
Hispanic	3,134	166	5.3%
Woonsocket			
A A 1	_	Sex	
Male	12,624	1,010	8.0%
Female	13,179	1,133	8.6%
\		/ Ethnicity	0.50/
White	26,864	2,286	8.5%
Black	2,646	238	9.0%
Asian	2,324	60	2.6%
Hispanic	4,745	655	13.8%

	Total Labor Force	Unemployed Individuals	Percent Unemployed
Remainder of State			
	Ву	/ Sex	
Male	161,315	8,758	5.4%
Female	167,652	7,338	4.4%
	By Race	/ Ethnicity	
White	424,962	22,171	5.2%
Black	10,956	1,204	11.0%
Asian	9,246	382	4.1%
Hispanic	25,304	1,676	6.6%

Figure 108 Rhode Island Poverty Rates by Race, 2010 - 2017

Figure 108 Rhode Island		2010			2017	
	Total Population	In Poverty	Poverty Rate	Total Population	In Poverty	Poverty Rate
Rhode Island						
Asian	29,290	5,031	17.2%	33,385	4,825	14.5%
Black	58,716	14,772	25.2%	65,194	15,658	24.0%
White	832,540	89,596	10.8%	823,518	89,596	10.9%
Hispanic	120,841	34,292	28.4%	149,894	43,392	28.9%
Total	1,014,029	123,396	12.2%	1,015,923	136,126	13.4%
Cranston						
Asian	4,012	538	13.4%	4,607	410	8.9%
Black	2,312	292	12.6%	3,937	563	14.3%
White	62,832	4,651	7.4%	63,473	5,790	9.1%
Hispanic	7,093	899	12.7%	10,451	1,798	17.2%
Total	74,596	6,239	8.4%	76,983	7,619	9.9%
East Providence						
Asian	4,012	538	13.4%	1,563	220	14.1%
Black	2,327	305	13.1%	3,134	439	14.0%
White	40,585	3,313	8.2%	38,100	3,468	9.1%
Hispanic	1,988	757	38.1%	2,460	602	24.5%
Total	46,804	4,372	9.3%	46,546	4,954	10.6%
Pawtucket						
Asian	1,377	262	19.0%	1,237	253	20.5%
Black	12,573	3,767	30.0%	13,250	2,940	22.2%
White	47,011	5,669	12.1%	44,191	7,843	17.7%
Hispanic	11,384	2,958	26.0%	17,325	5,373	31.0%
Total	71,021	12,640	17.8%	71,243	14,222	20.0%
Providence						
Asian	10,256	3,124	30.5%	9,801	2,893	29.5%
Black	26,029	7,012	26.9%	26,734	7,386	27.6%
White	74,227	15,357	26.9%	85,504	19,904	27.6%
Hispanic	66,786	21,911	32.8%	73,914	24,310	32.9%
Total	163,070	42,956	26.3%	166,058	44,702	26.9%
Warwick						
Asian	2,181	115	5.3%	2,252	96	4.3%
Black	1,409	131	9.3%	975	152	15.6%
White	77,060	5,801	7.5%	73,601	4,847	6.6%
Hispanic	1,909	154	8.1%	4,087	125	3.1%
Total	82,632	6,319	7.6%	80,368	5,381	6.7%
Woonsocket						
Asian	2,302	178	7.7%	3,012	94	3.1%
Black	1,890	627	33.2%	3,487	1,251	35.9%

		2010			2017	
	Total Population	In Poverty	Poverty Rate	Total Population	In Poverty	Poverty Rate
White	32,887	6,599	20.1%	31,584	7,580	24.0%
Hispanic	4,958	2,527	51.0%	7,107	3,217	45.3%
Total	40,273	8,944	22.2%	40,748	9,937	24.4%
Remainder of State						
Asian	5,150	276	5.4%	10,913	859	7.9%
Black	12,176	2,638	21.7%	13,677	2,927	21.4%
White	497,938	48,206	9.7%	487,065	40,164	8.2%
Hispanic	26,723	5,086	19.0%	34,550	7,967	23.1%
Total	535,633	41,926	7.8%	533,977	49,311	9.2%

Figure 109 Tenure by Race/Ethnicity, 2010 - 2017

		20 ⁻	10			2017				
Householder Race / Ethnicity	Owner-Occupied	Renter-Occupied	Percent Owner Occupied	Percent Renter Occupied	Owner- Occupied	Renter-Occupied	Percent Owner Occupied	Percent Renter Occupied		
Rhode Island										
White	231,315	122,775	65.3%	34.7%	226,822	123,354	64.8%	35.2%		
Black	6,559	13,929	32.0%	68.0%	7,270	15,917	31.4%	68.6%		
Asian	4,230	4,757	47.1%	52.9%	5,280	5,543	48.8%	51.2%		
Hispanic	9,986	26,668	27.2%	72.8%	12,645	32,954	27.7%	72.3%		
All Occupied Units	250,952	162,648	60.7%	39.3%	247,291	164,737	60.0%	40.0%		
Cranston										
White	18,968	8,279	69.6%	30.4%	17,849	8,399	68.0%	32.0%		
Black	533	573	48.2%	51.8%	670	774	46.4%	53.6%		
Asian	733	435	62.8%	37.2%	898	452	66.5%	33.5%		
Hispanic	966	1,196	44.7%	55.3%	1,540	1,575	49.4%	50.6%		
All Occupied Units	20,892	10,120	67.4%	32.6%	20,177	10,338	66.1%	33.9%		
East Providence										
White	10,819	6,632	62.0%	38.0%	10,719	6,296	63.0%	37.0%		
Black	436	679	39.1%	60.9%	509	714	41.6%	58.4%		
Asian	87	190	31.4%	68.6%	141	405	25.8%	74.2%		
Hispanic	155	371	29.5%	70.5%	172	604	22.2%	77.8%		
All Occupied Units	11,909	8,292	59.0%	41.0%	11,728	8,185	58.9%	41.1%		
Pawtucket										
White	10,776	10,203	51.4%	48.6%	9,683	9,157	51.4%	48.6%		
Black	847	2,520	25.2%	74.8%	1,076	3,189	25.2%	74.8%		
Asian	147	226	39.4%	60.6%	251	148	62.9%	37.1%		
Hispanic	1,099	3,357	24.7%	75.3%	1,420	3,960	26.4%	73.6%		
All Occupied Units	13,020	16,002	44.9%	55.1%	12,082	15,553	43.7%	56.3%		
Providence										
White	14,522	20,905	41.0%	59.0%	14,148	21,908	39.2%	60.8%		
Black	2,926	6,780	30.1%	69.9%	3,114	6,507	32.4%	67.6%		

		20	10		2017				
Householder Race / Ethnicity	Owner-Occupied	Renter-Occupied	Percent Owner Occupied	Percent Renter Occupied	Owner- Occupied	Renter-Occupied	Percent Owner Occupied	Percent Renter Occupied	
Asian	919	2,266	28.9%	71.1%	1,098	2,161	33.7%	66.3%	
Hispanic	4,706	14,561	24.4%	75.6%	5,326	17,268	23.6%	76.4%	
All Occupied Units	21,891	40,827	34.9%	65.1%	21,503	40,554	34.7%	65.3%	
Warwick									
White	24,408	8,923	73.2%	26.8%	23,869	8,993	72.6%	27.4%	
Black	295	242	54.9%	45.1%	198	224	46.9%	53.1%	
Asian	361	253	58.8%	41.2%	416	248	62.7%	37.3%	
Hispanic	421	299	58.5%	41.5%	821	329	71.4%	28.6%	
All Occupied Units	25,478	9,756	72.3%	27.7%	25,057	9,847	71.8%	28.2%	
Woonsocket									
White	5,906	8,320	41.5%	58.5%	5,810	8,290	41.2%	58.8%	
Black	172	783	18.0%	82.0%	154	1,201	11.4%	88.6%	
Asian	261	407	39.1%	60.9%	262	610	30.0%	70.0%	
Hispanic	194	1,499	11.5%	88.5%	218	2,136	9.3%	90.7%	
All Occupied Units	6,513	10,549	38.2%	61.8%	6,277	10,777	36.8%	63.2%	
Remainder of State									
White	145,916	59,513	71.0%	29.0%	144,744	60,311	70.6%	29.4%	
Black	1,350	2,352	36.5%	63.5%	1,549	3,308	31.9%	68.1%	
Asian	1,722	980	63.7%	36.3%	2,214	1,519	59.3%	40.7%	
Hispanic	2,445	5,385	31.2%	68.8%	3,148	7,082	30.8%	69.2%	
All Occupied Units	151,249	67,102	69.3%	30.7%	150,467	69,483	68.4%	31.6%	

Figure 110 Household Size by Race/Ethnicity, 2017

Household	Wh	ite	Bla	ack	A:	sian	Mult	i-racial	Othe	r race	Hisp	anic
Size	#	%	#	%	#	%	#	%	#	%	#	%
Rhode Island												
3 person	52,677	24.2%	3,595	27.0%	1,577	25.6%	1,646	26.8%	3,756	25.8%	7,042	25.1%
4 person	42,638	19.6%	2,912	21.8%	1,476	24.0%	1,469	23.9%	3,672	25.2%	7,206	25.7%
5 person	17,031	7.8%	1,708	12.8%	740	12.0%	756	12.3%	2,359	16.2%	4,521	16.1%
6 person	5,434	2.5%	760	5.7%	405	6.6%	322	5.2%	1,026	7.0%	1,987	7.1%
7 person	2,526	1.2%	549	4.1%	332	5.4%	285	4.6%	822	5.6%	1,569	5.6%
Total Family Households	217,856	100.0%	13,338		6,161	100.0%	6,147	100.0%	14,575	100.0%	28,087	100.0%
Cranston												
3 person	4,283	25.0%	192	26.5%	228	24.2%	94	25.8%	211	28.9%	454	26.1%
4 person	3,392	19.8%	162	22.3%	244	25.9%	76	20.9%	178	24.4%	445	25.6%
5 person	1,284	7.5%	96	13.2%	128	13.6%	42	11.5%	133	18.2%	281	16.2%
6 person	404	2.4%	43	5.9%	61	6.5%	28	7.7%	42	5.7%	116	6.7%
7 person	177	1.0%	38	5.2%	80	8.5%	20	5.5%	49	6.7%	104	6.0%
Total Family Households	17,134	100.0%	725	100.0%	941	100.0%	364	100.0%	731	100.0%	1,737	100.0%
East Providence												
3 person	2,585	24.9%	201	28.5%	52	31.9%	114	29.0%	119	25.5%	98	26.5%
4 person	1,972	19.0%	114	16.1%	31	19.0%	87	22.1%	107	22.9%	95	25.7%
5 person	716	6.9%	66	9.3%	12	7.4%	39	9.9%	45	9.6%	43	11.6%
6 person	231	2.2%	29	4.1%	7	4.3%	10	2.5%	18	3.9%	16	4.3%
7 person	100	1.0%	10	1.4%	1	0.6%	10	2.5%	15	3.2%	11	3.0%
Total Family Households	10,395	100.0%	706	100.0%	163	100.0%	393	100.0%	467	100.0%	370	100.0%
Pawtucket												
3 person	3,188	26.5%	670	29.6%	58	24.8%	277	28.9%	614	29.1%	951	28.4%
4 person	2,203	18.3%	527	23.3%	65	27.8%	231	24.1%	505	23.9%	822	24.5%
5 person	855	7.1%	276	12.2%	28	12.0%	115	12.0%	289	13.7%	449	13.4%

Household	Wh	ite	Bla	ack	As	sian	Multi	i-racial	Othe	r race	Hisp	anic
Size	#	%	#	%	#	%	#	%	#	%	#	%
6 person	334	2.8%	126	5.6%	10	4.3%	48	5.0%	121	5.7%	197	5.9%
7 person	168	1.4%	90	4.0%	11	4.7%	37	3.9%	64	3.0%	105	3.1%
Total Family Households	12,027	100.0%	2,263	100.0%	234	100.0%	957	100.0%	2,112	100.0%	3,351	100.0%
Providence												
3 person	3,914	24.1%	1,672	26.4%	449	24.0%	557	25.8%	2,011	24.9%	3,604	24.2%
4 person	2,902	17.8%	1,373	21.7%	392	21.0%	505	23.3%	2,064	25.6%	3,814	25.6%
5 person	1,466	9.0%	835	13.2%	242	12.9%	285	13.2%	1,368	16.9%	2,509	16.9%
6 person	588	3.6%	381	6.0%	159	8.5%	150	6.9%	637	7.9%	1,162	7.8%
7 person	435	2.7%	320	5.1%	149	8.0%	136	6.3%	532	6.6%	991	6.7%
Total Family Households	16,264	100.0%	6,325	100.0%	1,869	100.0%	2,163	100.0%	8,071	100.0%	14,871	100.0%
Warwick												
3 person	5,025	24.9%	98	30.4%	117	26.2%	68	28.2%	47	23.3%	120	22.1%
4 person	3,806	18.8%	69	21.4%	110	24.6%	57	23.7%	56	27.7%	159	29.2%
5 person	1,456	7.2%	29	9.0%	47	10.5%	27	11.2%	35	17.3%	76	14.0%
6 person	494	2.4%	15	4.7%	32	7.2%	7	2.9%	9	4.5%	30	5.5%
7 person	237	1.2%	10	3.1%	18	4.0%	10	4.1%	8	4.0%	24	4.4%
Total Family Households	20,217	100.0%	322	100.0%	447	100.0%	241	100.0%	202	100.0%	544	100.0%
Woonsocket												
3 person	2,037	25.6%	183	29.9%	150	28.2%	74	28.0%	161	27.9%	360	27.9%
4 person	1,372	17.2%	130	21.2%	132	24.8%	66	25.0%	143	24.7%	306	23.7%
5 person	605	7.6%	84	13.7%	73	13.7%	31	11.7%	83	14.4%	191	14.8%
6 person	265	3.3%	29	4.7%	52	9.8%	15	5.7%	36	6.2%	94	7.3%
7 person	135	1.7%	11	1.8%	22	4.1%	10	3.8%	22	3.8%	48	3.7%
Total Family Households	7,969	100.0%	612	100.0%	532	100.0%	264	100.0%	578	100.0%	1,291	100.0%

Household	usehold White		Black Asian		sian	Mult	i-racial	Other race		Hispanic		
Size	#	%	#	%	#	%	#	%	#	%	#	%
Remainder of State												
3 person	31,645	23.6%	579	24.3%	523	26.5%	462	26.2%	593	24.6%	1,455	24.6%
4 person	26,991	20.2%	537	22.5%	502	25.4%	447	25.3%	619	25.6%	1,565	26.4%
5 person	10,649	8.0%	322	13.5%	210	10.6%	217	12.3%	406	16.8%	972	16.4%
6 person	3,118	2.3%	137	5.7%	84	4.3%	64	3.6%	163	6.8%	372	6.3%
7 person	1,274	1.0%	70	2.9%	51	2.6%	62	3.5%	132	5.5%	286	4.8%
Total Family Households	133,850	100.0%	2,385	100.0%	1,975	100.0%	1,765	100.0%	2,414	100.0%	5,923	100.0%

Figure 111 Unit Size by Tenure, 2017

		2010			2017	
Unit Size	Owner- Occupied Units	Renter- Occupied Units	Percent Renter- Occupied	Owner- Occupied Units	Renter-Occupied Units	Percent Renter- Occupied
Rhode Island						
0 Bedroom	395	6,209	94.0%	588	9,118	93.9%
1 Bedroom	8,185	47,525	85.3%	7,243	49,354	87.2%
2 Bedroom	59,697	59,694	50.0%	57,625	61,977	51.8%
3+ Bedroom	188,268	40,332	17.6%	181,835	44,288	19.6%
Cranston						
0 Bedroom	-	259	100.0%	8	400	98.0%
1 Bedroom	562	3,426	85.9%	478	3,241	87.1%
2 Bedroom	4,408	4,346	49.6%	4,380	4,519	50.8%
3+ Bedroom	15,655	1,730	10.0%	15,311	2,178	12.5%
East Providence						
0 Bedroom	25	360	93.5%	25	566	95.8%
1 Bedroom	314	3,743	92.3%	352	3,179	90.0%
2 Bedroom	3,245	3,207	49.7%	2,691	2,888	51.8%
3+ Bedroom	8,322	1,055	11.3%	8,660	1,552	15.2%
Pawtucket						
0 Bedroom	31	559	94.7%	43	929	95.6%
1 Bedroom	476	4,277	90.0%	407	4,103	91.0%
2 Bedroom	3,720	6,717	64.4%	3,351	6,192	64.9%
3+ Bedroom	9,258	4,000	30.2%	8,281	4,329	34.3%
Providence						
0 Bedroom	43	2,029	97.9%	136	2,503	94.8%
1 Bedroom	1,052	9,308	89.8%	951	9,870	91.2%
2 Bedroom	6,164	15,619	71.7%	6,078	15,252	71.5%
3+ Bedroom	15,613	12,105	43.7%	14,338	12,929	47.4%
Warwick						

		2010			2017	
Unit Size	Owner- Occupied Units	Renter- Occupied Units	Percent Renter- Occupied	Owner- Occupied Units	Renter-Occupied Units	Percent Renter- Occupied
0 Bedroom	101	544	84.3%	60	710	92.2%
1 Bedroom	950	3,726	79.7%	814	3,966	83.0%
2 Bedroom	7,042	3,397	32.5%	6,887	3,401	33.1%
3+ Bedroom	18,561	1,351	6.8%	17,296	1,770	9.3%
Woonsocket						
0 Bedroom	-	251	100.0%	7	616	98.9%
1 Bedroom	363	2,761	88.4%	315	2,900	90.2%
2 Bedroom	1,677	3,834	69.6%	1,439	4,264	74.8%
3+ Bedroom	4,756	2,960	38.4%	4,516	2,997	39.9%
Remainder of State						
0 Bedroom	195	2,207	91.9%	309	3,394	91.7%
1 Bedroom	4,468	20,284	81.9%	3,926	22,095	84.9%
2 Bedroom	33,441	22,574	40.3%	32,799	25,461	43.7%
3+ Bedroom	116,103	17,131	12.9%	113,433	18,533	14.0%

Figure 112 Changes in Housing Costs and Household Income, 2010 - 2017

		2010	2017	Percent Change
	(ac	dj to 2017\$)	2017	2010-2017
Rhode Island				
Median Gross Rent	\$	991	\$ 957	-3.5%
Median Housing Value	\$	313,965	\$ 242,200	-22.9%
Median Household Income	\$	61,716	\$ 61,043	-1.1%
Cranston				
Median Gross Rent	\$	1,059	\$ 998	-5.8%
Median Housing Value	\$	291,033	\$ 219,900	-24.4%
Median Household Income	\$	65,111	\$ 71,191	9.3%
East Providence				
Median Gross Rent	\$	895	\$ 928	3.7%
Median Housing Value	\$	275,071	\$ 208,000	-24.4%
Median Household Income	\$	56,564	\$ 64,282	13.6%
Pawtucket				
Median Gross Rent	\$	899	\$ 878	-2.4%
Median Housing Value	\$	256,748	\$ 172,200	-32.9%
Median Household Income	\$	45,187	\$ 54,707	21.1%
Providence				
Median Gross Rent	\$	1,013	\$ 949	-6.3%
Median Housing Value	\$	273,834	\$ 181,100	-33.9%
Median Household Income	\$	41,508	\$ 44,909	8.2%
Warwick				
Median Gross Rent	\$	1,099	\$ 1,101	0.1%
Median Housing Value	\$	263,380	\$ 199,000	-24.4%
Median Household Income	\$	66,881	\$ 40,366	-39.6%
Woonsocket				
Median Gross Rent	\$	844	\$ 848	0.4%
Median Housing Value	\$	255,624	\$ 158,500	-38.0%
Median Household Income	\$	43,419	\$ 38,340	-11.7%

Figure 113 Mortgage application outcomes by race/ethnicity, 2015-2017 in Rhode Island

	Wh	ite	Bla	ıck	Asia	an	Oth	er	Race Unk	nown	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Approved	67,292	81.2%	2,280	68.0%	1,441	77.4%	433	67.1%	7,103	70.8%	5,447	71.7%	78,549	79.5%
Denied	15,583	18.8%	1,072	32.0%	421	22.6%	212	32.9%	2,931	29.2%	2,155	28.3%	20,219	20.5%
Total	82,875	83.9%	3,352	3.4%	1,862	1.9%	645	0.7%	10,034	10.2%	7,602	7.7%	98,768	100.0%

Figure 114 Mortgage application outcomes by race/ethnicity, 2015-2017 in Cranston

	Wh	ite	Bla	ck	Asi	ian	Oth	er	Race Unk	nown	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Approved	5,154	81.2%	205	68.6%	238	75.8%	45	71.4%	542	71.0%	696	74.5%	6,184	79.4%
Denied	1,193	18.8%	94	31.4%	76	24.2%	18	28.6%	221	29.0%	238	25.5%	1,602	20.6%
Total	6,347	81.5%	299	3.8%	314	4.0%	63	0.8%	763	9.8%	934	12.0%	7,786	100.0%

Figure 115 Mortgage application outcomes by race/ethnicity, 2015-2017 in East Providence

	W	nite	Blac	k	Asi	an	Ot	her	Race U	nknown		lispanic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Approved	2,736	81.2%	168	73.4%	7	15.6%	20	71.4%	314	72.5%	139	80.3%	3,245	79.0%
Denied	634	18.8%	61	26.6%	38	84.4%	8	28.6%	119	27.5%	34	19.7%	860	21.0%
Total	3,370	82.1%	229	5.6%	45	1.1%	28	0.7%	433	10.5%	173	4.2%	4,105	100.0%

Figure 116 Mortgage application outcomes by race/ethnicity, 2015-2017 in Pawtucket

	Whit	e	Blac	ck	Asia	ın	Oth	er	Race Uni	nown	Hispa	nic	To	tal
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Approved	2,878	75.2%	396	65.9%	57	73.1%	26	59.1%	396	65.2%	170	70.0%	3,753	72.8%
Denied	948	24.8%	205	34.1%	21	26.9%	18	40.9%	211	34.8%	73	30.0%	1,403	27.2%
Total	3,826	74.2%	601	11.7%	78	1.5%	44	0.9%	607	11.8%	243	4.7%	5,156	100.0%

Source: HMDA

Figure 117 Mortgage application outcomes by race/ethnicity, 2015-2017 in Providence

	Whit	te	Blac	ck	Asia	ın	Oth	er	Race Unk	nown	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Approved	5,536	77.9%	680	62.3%	257	71.8%	78	54.2%	986	67.0%	2,083	68.3%	7,537	74.1%
Denied	1,570	22.1%	411	37.7%	101	28.2%	66	45.8%	485	33.0%	967	31.7%	2,633	25.9%
Total	7,106	69.9%	1,091	10.7%	358	3.5%	144	1.4%	1,471	14.5%	3,050	30.0%	10,170	100.0%

Figure 118 Mortgage application outcomes by race/ethnicity, 2015-2017 in Warwick

	Whit	:e	Blac	ck	Asia	ın	Oth	er	Race Unk	nown	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Approved	6,855	82.1%	152	80.0%	108	81.8%	40	71.4%	558	68.6%	254	74.5%	7,713	80.9%
Denied	1,490	17.9%	38	20.0%	24	18.2%	16	28.6%	256	31.4%	87	25.5%	1,824	19.1%
Total	8,345	87.5%	190	2.0%	132	1.4%	56	0.6%	814	8.5%	341	3.6%	9,537	100.0%

Figure 119 Mortgage application outcomes by race/ethnicity, 2015-2017 in Woonsocket

	Whit	e	Blac	ck	Asia	ın	Oth	er	Race Unk	nown	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Approved	1,535	76.6%	71	62.8%	58	67.4%	15	78.9%	234	71.1%	144	75.8%	1,913	75.0%
Denied	468	23.4%	42	37.2%	28	32.6%	4	21.1%	95	28.9%	46	24.2%	637	25.0%
Total	2,003	78.5%	113	4.4%	86	3.4%	19	0.7%	329	12.9%	190	7.5%	2,550	100.0%

Source: HMDA

Figure 120 Mortgage application outcomes by race/ethnicity, 2015-2017 in Rhode Island Balance of State

	Whi	te	Blac	ck	Asia	ın	Oth	er	Race Unk	nown	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Approved	42,588	82.1%	607	73.7%	684	80.7%	209	72.1%	4,069	72.6%	1,476	74.2%	48,157	81.0%
Denied	9,260	17.9%	217	26.3%	164	19.3%	81	27.9%	1,539	27.4%	512	25.8%	11,261	19.0%
Total	51,848	87.3%	824	1.4%	848	1.4%	290	0.5%	5,608	9.4%	1,988	3.3%	59,418	100.0%

Figure 121 Rate of high cost loan originations by race/ethnicity in Rhode Island, 2015-2017

	Whit	e	Blac	:k	Asia	ın	Oth	er	Race Unl	known	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Not high cost	67,292	96.5%	2,280	93.0%	1,441	96.5%	433	96.4%	7,103	97.1%	5,447	92.9%	78,549	96.4%
High cost	2,442	3.5%	172	7.0%	53	3.5%	16	3.6%	214	2.9%	419	7.1%	2,897	3.6%
Total	69,734	85.6%	2,452	3.0%	1,494	1.8%	449	0.6%	7,317	9.0%	5,866	7.2%	81,446	100.0%

Figure 122 Rate of high cost loan originations by race/ethnicity in Cranston, 2015-2017

	Whit	:e	Blac	:k	Asia	ın	Oth	er	Race Unl	known	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Not high cost	5,154	95.7%	205	91.1%	238	95.6%	45	95.7%	542	96.1%	696	93.4%	6,184	95.6%
High cost	229	4.3%	20	8.9%	11	4.4%	2	4.3%	22	3.9%	49	6.6%	284	4.4%
Total	5,383	83.2%	225	3.5%	249	3.8%	47	0.7%	564	8.7%	745	11.5%	6,468	100.0%

Source: HMDA

Figure 123 Rate of high cost loan originations by race/ethnicity in East Providence, 2015-2017

	Whit	e	Blac	:k	Asia	ın	Oth	er	Race Unl	known	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Not high cost	2,736	96.0%	168	94.4%	7	70.0%	20	95.2%	314	96.9%	139	96.5%	3,245	95.9%
High cost	114	4.0%	10	5.6%	3	30.0%	1	4.8%	10	3.1%	5	3.5%	138	4.1%
Total	2,850	84.2%	178	5.3%	10	0.3%	21	0.6%	324	9.6%	144	4.3%	3,383	100.0%

Figure 124 Rate of high cost loan originations by race/ethnicity in Pawtucket, 2015-2017

	Whit	:e	Blac	:k	Asia	ın	Otl	ner	Race Un	known	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Not high cost	2,878	94.8%	396	93.2%	57	98.3%	26	100.0%	396	95.2%	170	75.9%	3,753	94.7%
High cost	158	5.2%	29	6.8%	1	1.7%	-	0.0%	20	4.8%	54	24.1%	208	5.3%
Total	3,036	76.6%	425	10.7%	58	1.5%	26	0.7%	416	10.5%	224	5.7%	3,961	100.0%

Figure 125 Rate of high cost loan originations by race/ethnicity in Providence, 2015-2017

	Whit	e	Blac	:k	Asia	ın	Oth	er	Race Unl	known	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Not high cost	5,536	94.8%	680	92.0%	257	96.3%	78	97.5%	986	95.5%	2,083	91.1%	7,537	94.7%
High cost	306	5.2%	59	8.0%	10	3.7%	2	2.5%	46	4.5%	203	8.9%	423	5.3%
Total	5,842	73.4%	739	9.3%	267	3.4%	80	1.0%	1,032	13.0%	2,286	28.7%	7,960	100.0%

Figure 126 Rate of high cost loan originations by race/ethnicity in Warwick, 2015-2017

	Whit	e	Blac	k	Asia	ın	Oth	er	Race Unl	known	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Not high cost	6,855	96.1%	152	89.4%	108	93.9%	40	93.0%	558	96.9%	254	93.4%	7,713	96.0%
High cost	278	3.9%	18	10.6%	7	6.1%	3	7.0%	18	3.1%	18	6.6%	324	4.0%
Total	7,133	88.8%	170	2.1%	115	1.4%	43	0.5%	576	7.2%	272	3.4%	8,037	100.0%

Source: HMDA

Figure 127 Rate of high cost loan originations by race/ethnicity in Woonsocket, 2015-2017

	Whit	:e	Blac	k	Asia	ın	Ot	ner	Race Unl	known	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Not high cost	1,535	94.3%	71	88.8%	58	89.2%	15	100.0%	234	95.5%	144	90.6%	1,913	94.1%
High cost	93	5.7%	9	11.3%	7	10.8%	-	0.0%	11	4.5%	15	9.4%	120	5.9%
Total	1,628	80.1%	80	3.9%	65	3.2%	15	0.7%	245	12.1%	159	7.8%	2,033	100.0%

Source: HMDA

Figure 128 Rate of high cost loan originations by race/ethnicity in Rhode Island Balance of State, 2015-2017

	Whit	е	Blac	:k	Asia	ın	Oth	er	Race Unl	known	Hispa	nic	Tot	al
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Not high cost	42,588	97.1%	607	95.7%	684	98.0%	209	96.3%	4,069	97.9%	1,476	95.2%	48,157	97.2%
High cost	1,264	2.9%	27	4.3%	14	2.0%	8	3.7%	87	2.1%	75	4.8%	1,400	2.8%
Total	43,852	88.5%	634	1.3%	698	1.4%	217	0.4%	4,156	8.4%	1,551	3.1%	49,557	100.0%

Figure 129 High cost loan originations by income level by race in Rhode Island, 2015-2017

	Wh	ite	Bla	ck	Asi	an	Oth	er	Race Un	known	Hispa	anic	То	tal
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
High Cost Loans Originated	2,442	84.3%	172	5.9%	53	1.8%	16	0.6%	214	7.4%	419	14.5%	2,897	100.0%
Applicant Income Above AMI	1,068	43.7%	60	34.9%	18	34.0%	4	25.0%	82	38.3%	79	18.9%	1,232	42.5%
Applicant Income Below AMI	1,374	56.3%	112	65.1%	35	66.0%	12	75.0%	132	61.7%	340	81.1%	1,665	57.5%

Figure 130 High cost loan originations by income level by race in Cranston 2015-2017

	Wh	ite	Bla	ck	Asi	an	Ot	her	Race Un	known	Hispa	anic	To	tal
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
High Cost Loans Originated	229	80.6%	20	7.0%	11	3.9%	2	0.7%	22	7.7%	49	17.3%	284	100.0%
Applicant Income Above AMI	110	48.0%	8	40.0%	5	45.5%	1	0.0%	10	45.5%	10	20.4%	133	46.8%
Applicant Income Below AMI	119	52.0%	12	60.0%	6	54.5%	2	100.0%	12	54.5%	39	79.6%	151	53.2%

Figure 131 High cost loan originations by income level by race in East Providence, 2015-2017

	Wh	ite	Bla	ck	As	ian	Ot	her	Race Un	known	Hisp	anic	То	tal
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
High Cost Loans Originated	114	82.6%	10	7.2%	3	2.2%	1	0.7%	10	7.2%	5	3.6%	138	100.0%
Applicant Income Above AMI	45	39.5%	6	60.0%	1	0.0%	1	0.0%	4	40.0%	2	40.0%	55	39.9%
Applicant Income Below AMI	69	60.5%	4	40.0%	3	100.0%	1	100.0%	6	60.0%	3	60.0%	83	60.1%

Figure 132 High cost loan originations by income level by race in Pawtucket, 2015-2017

		White		Black		Asian		Other	Race Ur	known	Ε.	lispanic		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
High Cost Loans Originated	158	76.0%	29	13.9%	1	0.5%	1	1	20	9.6%	54	26.0%	208	100.0%
Applicant Income Above AMI	45	28.5%	6	20.7%	1	0.0%	1	1	4	20.0%	10	18.5%	55	26.4%
Applicant Income Below AMI	113	71.5%	23	79.3%	1	100.0%	-	-	16	80.0%	44	81.5%	153	73.6%

Figure 133 High cost loan originations by income level by race in Providence, 2015-2017

	Whi	ite	Bla	ck	Asi	an	Ot	:her	Race Un	known	Hisp	anic	То	tal
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
High Cost Loans Originated	306	72.3%	59	13.9%	10	2.4%	2	0.5%	46	10.9%	203	48.0%	423	100.0%
Applicant Income Above AMI	69	22.5%	16	27.1%	1	10.0%	1	0.0%	11	23.9%	25	12.3%	97	22.9%
Applicant Income Below AMI	237	77.5%	43	72.9%	9	90.0%	2	100.0%	35	76.1%	178	87.7%	326	77.1%

Figure 134 High cost loan originations by income level by race in Warwick, 2015-2017

	Whi	ite	Bla	ck	Asi	an	Ot	her	Race Un	known	Hispa	anic	То	tal
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
High Cost Loans Originated	278	85.8%	18	5.6%	7	2.2%	3	0.9%	18	5.6%	18	5.6%	324	100.0%
Applicant Income Above AMI	109	39.2%	6	33.3%	3	42.9%	1	0.0%	6	33.3%	7	38.9%	124	38.3%
Applicant Income Below AMI	169	60.8%	12	66.7%	4	57.1%	3	100.0%	12	66.7%	11	61.1%	200	61.7%

Figure 135 High cost loan originations by income level by race in Woonsocket, 2015-2017

	Whi	ite	Bla	ck	Asia	an	Otl	her	Race Un	known	Hispa	anic	То	tal
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
High Cost Loans Originated	93	77.5%	9	7.5%	7	5.8%	-	1	11	9.2%	15	12.5%	120	100.0%
Applicant Income Above AMI	27	29.0%	5	55.6%	4	57.1%	-	1	4	36.4%	2	13.3%	40	33.3%
Applicant Income Below AMI	66	71.0%	4	44.4%	3	42.9%	-	ı	7	63.6%	13	86.7%	80	66.7%

Figure 136 High cost loan originations by income level by race in Rhode Island Balance of State, 2015-2017

	Whi	ite	Bla	ck	Asi	an	Oth	er	Race Un	known	Hispa	anic	То	tal
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
High Cost Loans Originated	1,264	90.3%	27	1.9%	14	1.0%	8	0.6%	87	6.2%	75	5.4%	1,400	100.0%
Applicant Income Above AMI	663	52.5%	13	48.1%	5	35.7%	4	50.0%	43	49.4%	23	30.7%	728	52.0%
Applicant Income Below AMI	601	47.5%	14	51.9%	9	64.3%	4	50.0%	44	50.6%	52	69.3%	672	48.0%