



City of Providence
HOME-ARP Allocation Plan
DRAFT

Brett P. Smiley, Mayor
City of Providence

Joseph Mulligan, Director of Planning & Development
Emily Freedman, Director of Community Development

EXECUTIVE SUMMARY

The HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) is a one-time appropriation made available through the American Rescue Plan Act of 2021 to HOME entitlement communities to reduce homelessness and increase housing stability. Participating Jurisdictions (“PJs”) such as the City of Providence have received funding allocations to address four allowable activities primarily benefitting qualifying individuals and families who are homeless, at risk of homelessness, fleeing (or attempting to flee) domestic/dating violence, sexual assault, stalking or Human Trafficking - or are members of other vulnerable “Qualifying Populations”.

HOME-ARP eligible activities include: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units.

To access these funds, PJs must develop HOME-ARP Allocation Plans to be submitted to and approved by the U.S. Department of Housing & Urban Development. The following Allocation Plan draft quantifies the need in the community, identifies the qualifying populations to be served by this funding, and the level of funding to be made available to eligible activity types.

CONSULTATION

Describe the consultation process including methods used and dates of consultation:

To prepare for the development of this HOME-ARP Allocation Plan (“Plan”), the City of Providence Division of Housing and Community Development (“HCD”) engaged in a thorough consultation and outreach process. As part of that process, HCD staff held focus groups with stakeholders, community and nonprofit leaders, and subject matter experts in the City of Providence to ensure the Plan was drafted to reflect community priorities and needs. In addition, staff from HCD attended standing meetings of several relevant groups to present on and/or discuss the HOME-ARP program – and to solicit input on priority needs and gaps in the current system.

HCD met and continues to meet with -- representatives from Rhode Island Housing, the Rhode Island Continuum of Care, and the Rhode Island Coalition to End Homelessness to ensure smooth coordination between the City and State HOME-ARP programs, the Coordinated Entry System, and alignment with Continuum of Care policies and procedures.

On January 6, 2022, HCD staff made a presentation and solicited input on the HOME-ARP program at the Rhode Island Continuum of Care meeting. The Rhode Island Statewide Continuum of Care was established pursuant to federal regulation, and this diverse coalition engages in system-wide policymaking and planning to address homelessness; improve coordination and integration with mainstream resources and other programs targeted to people at risk of or

experiencing homelessness; and seeks to improve data collection and performance measurement. The Rhode Island Continuum of Care is comprised of persons with lived experience of homelessness, nonprofit providers of housing and/or services for the homeless, victim service providers, faith-based agencies, governmental entities, housing authorities, housing developers, healthcare providers, veterans' organizations, and more. This diverse coalition of stakeholders offered subject matter expertise on system gaps and priorities for investment of HOME-ARP.

A further listening session was also held with individuals with lived experience of homelessness—the Rhode Island's Coalition to End Homelessness's Constituent Advisory Committee – at their regular meeting on February 17, 2022.

Feedback was also sought directly from the City's largest landlord – the local housing authority. Multiple members of HCD's team met with a group of Providence Housing Authority staff on January 19, 2022 to solicit input and lay the groundwork for successful HOME-ARP collaboration.

An in-person convening of local community development corporations (CDCs) that develop and operate affordable rental housing in Providence took place on April 11, 2022 – hosted by the Housing Network of Rhode Island for its members to discuss eligible uses, identify priority needs, and discuss any barriers in development of affordable housing for HOME-ARP qualifying populations.

HCD staff also convened sessions with homeless service providers directly, including Crossroads Rhode Island (the largest provider of homelessness services in Rhode Island) and OpenDoors (shelter, transitional housing, and service provider for justice-involved and other special needs clients) to identify gaps in the current shelter, housing, and service system, and what new ideas would be feasible given system and organizational capacity.

Listening sessions were also convened staff from two local legal aid offices (who provide eviction defense, fair housing, and other legal and civil rights services), along with representatives from the Rhode Island Developmental Disabilities Council.

Staff from multiple, different member-agencies joined in for a very robust discussion about the needs and gaps in the systems services hosted by the Rhode Island Coalition Against Violence, focused on the unique needs of qualified populations who are victims of domestic violence and trafficking.

Throughout the community engagement processes, several themes consistently emerged as to how to utilize funding to best meet the unique needs of the qualifying populations.

The largest single category of funding recommended for recovery spending in Providence generally was 'Housing and Homelessness' – with many of the community-driven programmatic suggestions aligned with HOME-ARP eligible uses. These broad community recommendations for recovery spending included:

- ➔ Expansion of immediate shelter and rapid rehousing;
- ➔ Increased supply and preservation of affordable housing units through a variety of tools including but not limited to land banking and strategic acquisition, repairs, rehabilitation, and new construction;
- ➔ Focus on increasing housing opportunities for people and families with low or no income;
- ➔ Fund supportive housing and other inclusive housing models;
- ➔ Invest in creative homelessness prevention and housing stabilization programs and maintain accessibility and affordability.

The HOME-ARP consultations similarly pointed to a critical shortage in price-appropriate units for qualifying populations (households at or below 50% of area median income). The shortage of rental units priced below fair market rent and meeting basic habitability standards was flagged as a consistent challenge in utilization of rapid rehousing or housing vouchers and the primary source of the system “logjam”.

The need for ongoing operating subsidy or tenant-based subsidy to enable leasing to very-low or no-income tenants was also highlighted by the non-profit development community, along with challenges in aligning any available rental units (existing or to be developed) with the long-term subsidy and necessary and appropriate wraparound tenant case management necessary to enable successful long-term tenancies.

Concerns related to the termination of the State’s Rent Relief RI rental assistance program have been raised, with developers, providers and advocates expressing collective anxiety on the potential windfall of impending evictions.

Many advocates, service providers and community members spoke about the need for not just more shelter beds – but also the need for a more comprehensive, coordinated, low-barrier system that serves a greater number of subpopulations. Multiple comments were made about the need for fully accessible shelter options, shelter beds that are paired with holistic wrap-around services, and the need shelter options that are trauma-informed to serve a wide variety of people – including those involved with the justice system, the LGBTQ community, transitional aged youth, and disabled individuals. Concerns were raised that shelters are disproportionately concentrated in and around Providence – and that transit options limit access for households needing shelter outside Rhode Island’s urban core.

The clear and stated preference from surveyed unsheltered clients and those with lived experience participating in advisory groups was non-congregate shelter (hotels, leased units, small shared-occupancy units) and low-barrier options.

The complete list of groups consulted, and a summary of the feedback provided, is below:

List of Organizations Consulted:

| Agency/Organization Consulted | Agency Type | Method of Consultation | Feedback |
|--|---|------------------------|--|
| Rhode Island Continuum of Care | <p>CoC serving the jurisdiction's geographic area (State of Rhode Island)</p> <p>Participant agency types:</p> <p>https://www.rihousing.com/wp-content/uploads/Board-Contact-list-11.23.2022.pdf</p> | Public Meeting | <ul style="list-style-type: none"> • Not enough shelter beds or staffing (need to increase both) • Focus funding on those experiencing homelessness and impacted by COVID-19 • Consult with people with lived experience as part of Plan development • Address lack of transit options |
| Rhode Island Housing | <p>Public Housing Agency / Housing Finance Agency</p> <p>(QP1 - homeless, QP2- at risk of homeless, QP3 - fleeing DV, and QP4- those requiring assistance to avoid homelessness/those at greatest risk of homelessness)</p> | Virtual Meetings | <ul style="list-style-type: none"> • Leverage HOME-ARP funding where possible with other funding sources coming on-line (shelter & development) • Coordinate capacity building support for providers |
| Rhode Island Coalition to End Homelessness (RICEH) | <p>Homeless service provider</p> <p>Private Organization that addresses Civil Rights and Fair Housing</p> <p>Private Organization that addresses the needs of persons with disabilities</p> | Virtual Meetings | <ul style="list-style-type: none"> • Data shows critical shortages of both beds and units • Utilization of Coordinated Entry System to prioritize highest acuity for assistance |
| RICEH – Constituent Advisory Committee | Homeless service provider | Virtual Meeting | <ul style="list-style-type: none"> • Increase affordable housing units • All housing and shelter needs to have lower barriers (create “wet” and “dry” options, more options for couples, ensure access for persons with medical devices) • Wrap around services should be prioritized for the most vulnerable |

| | | | |
|---|--|-----------------|---|
| | | | <ul style="list-style-type: none"> • Increase transit options • Ensure coordination and connectivity between all services • Increase shelter beds – especially for youth / transitional aged youth • Increase all mental health services, make truly wrap-around |
| Rhode Island Coalition to End Domestic Violence | Domestic violence service provider | Virtual Meeting | <ul style="list-style-type: none"> • Fund suitable housing options for victims of violence • Larger units for families needed • Increase both low- and middle-income housing production • Increase wrap around services • Increase navigation services – for housing, benefits, health and mental health care • Shelter needs to be accessible for all populations, genders, criminal records |
| Crossroads RI | Homeless service provider Domestic violence service provider | Virtual Meeting | <ul style="list-style-type: none"> • Need more middle-income housing stock in the 30-50% range • Need for greater wrap around and diversion services – including for people living in market rate housing • Prioritize funds for permanent supportive housing to meet greatest needs • Ensure all shelter funded is low barrier |
| Providence Housing Authority | Public Housing Agency Public Housing Agency that addresses the needs of the Qualifying Populations (QP2- at | Virtual Meeting | <ul style="list-style-type: none"> • Need for increasing landlord participation in voucher programs |

| | | | |
|---------------------------------|--|-----------------|---|
| | <p>risk of homeless, QP3 - fleeing DV, and QP4- those requiring assistance to avoid homelessness/those at greatest risk of homelessness)</p> | | <ul style="list-style-type: none"> • Case management services should be available to Section 8 voucher holders in private housing • Services should be fully funded • Fund developments with Tenant Selection Plans that reach target demographics most effectively • Support needed for staff who provide key services in this high turnover environment |
| Rhode Island Legal Services | <p>Private Organization that addresses Civil Rights and Fair Housing</p> <p>Private Organization that addresses the needs of persons with disabilities</p> | Virtual Meeting | <ul style="list-style-type: none"> • Difficult to place housing vouchers • Prioritize housing with services over just more housing units • Need to create more “no reject” housing and shelter options • Housing navigation needed across all populations • Rental assistance has been impactful, needs to be replaced • Shelter is necessary but should be limited, dignified and meet special needs |
| Rhode Island Center for Justice | <p>Private Organization that addresses Civil Rights and Fair Housing</p> <p>Private Organization that addresses the needs of persons with disabilities</p> | Virtual Meeting | <ul style="list-style-type: none"> • Prioritize housing with services over just more housing units • Housing navigation needed across all populations • Rental assistance has been impactful, needs to be replaced • Increase wrap-around services • Increase mental health services |

| | | | |
|---------------------------|------------------------------------|-------------------|---|
| | | | <ul style="list-style-type: none"> • Services should be available to all, both in subsidized and market • Need more transitional housing options, and a long-term plan for the system overall |
| OpenDoors | Homeless service provider | Virtual Meeting | <ul style="list-style-type: none"> • Increase larger units, not just single units of housing • Need more clinical therapy for all • Need to create more low-barrier housing and shelter options for justice-involved or other hard-to-house populations • Increase wrap-around services, especially those that can be reimbursed or are billable to federal sources |
| Sojourner House | Domestic violence service provider | Virtual Meeting | <ul style="list-style-type: none"> • Prioritize housing with services over just more housing units • Need more clinical therapy for all • Need more supports for victims fleeing with just a backpack and rebuilding their lives – basic needs, furniture, etc. • Staff are a valuable investment; staff retention & availability is a challenge |
| Providence Revolving Fund | Non-profit housing provider | In-person Meeting | <ul style="list-style-type: none"> • Need more housing units and more housing units with services • Need to balance single units with family units/larger units • Residents need tailored services, especially financial counseling & mental health services |

| | | | |
|------------------------------|-----------------------------|-------------------|---|
| | | | <ul style="list-style-type: none"> Concerns regarding end of Rent Relief & other programs System gap for low-income households without another qualifying factor |
| OMNI Development Corporation | Non-profit housing provider | In-person Meeting | <ul style="list-style-type: none"> Need more housing units and more housing units with services Need to balance single units with family units/ larger units Some kind of rental assistance is needed, with greater accountability Concerns regarding end of Rent Relief & other programs Service coordination is a challenge, barrier to accepting some qualifying populations Increase connectivity of all services to tenants Increase participation of property owners in vouchers and rent assistance Residents need tailored services – financial counseling, case management |
| ONE Neighborhood Builders | Non-profit housing provider | In-person Meeting | <ul style="list-style-type: none"> Need more housing units Concerns regarding end of Rent Relief & other programs; rental assistance is needed, with greater accountability Funding needed to support operating expenses of deeply-affordable projects Structure funds into projects as revolving where possible |

| | | | |
|---|--|-------------------|---|
| | | | <ul style="list-style-type: none"> Affordable rents (tax credit, etc.) are not actually affordable without layered operating or tenant subsidies |
| Stop Wasting Abandoned Property | Non-profit housing provider | In-person Meeting | <ul style="list-style-type: none"> Need more housing units (insufficient stock) Concerns regarding end of Rent Relief & other programs; some kind of rental assistance is needed, with greater accountability Concerns regarding displacement of tenants due to non-payment Funding needed to support operating expenses for deeper affordability |
| Women's Development Corporation | Non-profit housing provider | In-person Meeting | <ul style="list-style-type: none"> Residents need tailored services, especially financial counseling & therapy Need to address clients exiting Rent Relief, and provide supports Need more housing units and more housing units with services |
| Housing Network of Rhode Island | Non-profit housing provider | In-person Meeting | <ul style="list-style-type: none"> Need more housing units and more housing units with services Increase participation of property owners in vouchers and rent assistance Leverage these funds with housing production, other funds out or forthcoming |
| Rhode Island Developmental Disabilities Council | Public organization that addresses the needs of person with disabilities | Virtual Meeting | <ul style="list-style-type: none"> Very difficult to meet the diverse needs of disabled clients around Rhode Island Increase wrap-around services |

| | | | |
|--|--|--|---|
| | | | <ul style="list-style-type: none"> Transit options limit service options |
|--|--|--|---|

PUBLIC PARTICIPATION

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the Plan:

Date of Public Notice: _____

Public Comment Period Start Date: _____

Date of Public Hearing: _____

The City provided opportunity for public input as a central part of the process of drafting the HOME-ARP Allocation Plan ("Plan"). Consistent with the City's Citizen Participation Plan, the process of participation for drafting this Plan was designed to be robust and inclusive – and took place from Spring 2021 through Winter 2022. Members of the general public, individuals with direct lived experience, staff and leadership at partner nonprofits, affordable housing developers and homeless service providers, and community and client advocates were all invited to participate. The resulting draft Plan has been made available for public review and comment starting February ____, 2023 for 15-days at <https://www.providenceri.gov/planning/community-development/> and is available in hard copy upon request.

On February ____, 2023, a public hearing will be convened in-person and virtually to solicit further input and receive additional feedback from the public – as well as from key partners who provide direct services to the members of the qualifying populations the HOME-ARP program seeks to assist. At this hearing, staff will present an overview of HOME-ARP including the potential eligible uses of funds, the characteristics of the qualifying populations, the amount of HOME-ARP funding HCD is expected to receive, the proposed range of activities to be funded, and the process of fulfilling HUD requirements for securing HOME-ARP funding including the development of this Allocation Plan and timeline of the program. During the public hearing, staff will be available to field clarifying questions about the potential activities and client eligibility, receive any further feedback and public comment on how to prioritize HOME-ARP funds and any further input as to the needs and gaps in the current system of services and shelters.

It is important to note that public engagement related to the City's response to the COVID-19 public health emergency or its negative economic impacts has not been limited exclusively to HOME-ARP. In preparation for the receipt of unprecedented resources through the American Rescue Plan Act (Treasury SLFRF Funding, HOME-ARP, and other funds), the City underwent an extensive community engagement and hearing process to inform recovery spending starting in Spring 2021. That process included co-hosted meetings with community organizations, an empaneled Providence Rescue Plan Task Force with community representation, and solicitation

of more than 1,100 survey responses (representative of the racial/ethnic breakdown of Providence). A summary of the City's recovery planning process and associated recommendations related to housing and homelessness can be found: <https://pvdrescueplan.com/>.

Through a parallel planning process (the RICoC applied for HUD's Continuum of Care Supplemental Funding Opportunity to Address Unsheltered and Rural Homelessness in fall 2022), an effort was undertaken to survey unsheltered clients experiencing homelessness on their needs and preferences for the uses of any additional emergency funding that might be made available for spending in Rhode Island. Outreach workers successfully engaged 125 unsheltered individuals, and the findings of the survey also have significant relevance to HOME-ARP planning. The responses to this informal survey ranked "a safe place to rest/sleep" as the most important need, with 65% of respondents selecting it as their first priority. When asked what additional supports they need but are not currently receiving, 72% of respondents chose "housing search and identification supports". Respondents selected "can't afford it" as the top barrier to obtaining housing, and when asked about shelter, only 3% responded affirmatively as to whether the current system meets their needs. The survey demonstrated a clear stated preference for non-congregate shelter options (with hotel rooms or leased units being the preferred shelter option).

As result of the HOME-ARP public hearing, the 2021/2022 Providence Rescue Plan and HOME-ARP public engagement processes – and the 2022 survey of individuals experiencing homelessness – this Allocation Plan and the City's implementation of HOME-ARP will be driven by community priorities identified through outreach, consultation and public engagement.

Describe any efforts to broaden public participation:

To ensure the Plan is grounded in feedback directly from the public, HCD's goal is to reach residents and stakeholders from a wide variety of backgrounds - especially persons of color, those with limited English proficiency/ non-English speakers, persons with disabilities, and special needs populations. Public notice of the availability of the draft Plan, the details for the Public Hearing, and the notice of the comment period was made through email, public postings, multilingual newspaper advertisements, Open Meetings portal, and online City social media (Twitter, Facebook, YouTube). Offering the ability to participate in the Public Hearing both in person and virtually is part of the City's efforts to broaden public participation – and ensure that the widest possible group of interested constituents can participate in the process.

Summarize the comments and recommendations received through the public participation process either in writing or orally at a public hearing:

Additional comments collected through the comment period to be reported here.

Summarize any comments or recommendations not accepted and state the reasons why.

TBD-- to be reported here upon completion of the comment period.

NEEDS ASSESSMENT AND GAP ANALYSIS

The City as a HOME-ARP Participating Jurisdiction (PJ) must evaluate the size and demographic composition of its HOME-ARP qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, the City is charged with identifying any gaps within its current shelter and housing inventory as well as the service delivery system.

The City utilized current data, including the Point in Time Count, Housing Inventory Count, Rhode Island Continuum of Care data, the RI Homeless Management Information System (HMIS), and data gleaned through consultations with service providers to quantify the individuals and families in the qualifying populations and their need for expanded housing, shelter, or service options.

The City also relied in part on the “Rental Housing Gap Analysis” conducted by RKG Associates as part of the drafting of the City’s Anti-Displacement and Comprehensive Housing Strategy. That local analysis – combined with American Community Survey and Comprehensive Housing Affordability Strategy data informs the tables below.

Homeless Needs Inventory & Gap Analysis Table (Statewide)

| Homeless | | | | | | | | | | | | | |
|------------------------------|-------------------|------------|-------------|------------|-----------|------------------------------|----------------------|------|---------------|--------------|------------|-------------|------------|
| | Current Inventory | | | | | Homeless Population | | | | Gap Analysis | | | |
| | Family | | Adults Only | | Vets | Family HH (at least 1 child) | Adult HH (w/o child) | Vets | Victims of DV | Family | | Adults Only | |
| | # of Beds | # of Units | # of Beds | # of Units | # of Beds | | | | | # of Beds | # of Units | # of Beds | # of Units |
| Emergency Shelter | 426 | 144 | 738 | 706 | 0 | | | | | | | | |
| Transitional Housing | 170 | 73 | 104 | 97 | 94 | | | | | | | | |
| Permanent Supportive Housing | 540 | 152 | 803 | 765 | 277 | | | | | | | | |
| Other Permanent Housing | | | | | | 135 | 705 | 30 | 187 | | | | |

| | | | | | | | | | | | | | |
|----------------------|--|--|--|--|--|-----|-----|----|-----|-----|-----|-----|-----|
| Sheltered Homeless | | | | | | 156 | 520 | 85 | 182 | | | | |
| Unsheltered Homeless | | | | | | 41 | 291 | 6 | 115 | | | | |
| Current Gap | | | | | | | | | | 591 | 197 | 840 | 811 |

Data Source: 1) Point-in-Time Count (PIT); 2) Continuum of Care Housing Inventory Count (HIC); 3) Consultation

Housing Needs Inventory & Gap Analysis Table (Statewide)

| Non-Homeless | | | |
|--|-------------------|-----------------|-----------------|
| | Current Inventory | Level of Need | Gap Analysis |
| | # of Units | # of Households | # of Households |
| Total Rental Units | 160,997 | | |
| Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness) | 25,241 | | |
| Rental Units Affordable to HH at 50% AMI (Other Populations) | 61,683 | | |
| 0-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness) | | 31,960 | |
| 30-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations) | | 21,440 | |
| Current Gaps | | | 6,719 |

Data Sources: 1) American Community Survey (ACS); 2) Comprehensive Housing Affordability Strategy (CHAS)

Housing Needs Inventory & Gap Analysis Table (City of Providence)

| Non-Homeless | | | |
|--|-------------------|-----------------|-----------------|
| | Current Inventory | Level of Need | Gap Analysis |
| | # of Units | # of Households | # of Households |
| Total Rental Units | 51,740 | | |
| Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness) | 10,178 | | |
| Rental Units Affordable to HH at 50% AMI (Other Populations) | 9,649 | | |

| | | | |
|--|--|--------|-------|
| 0-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness) | | 10,165 | |
| 30-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations) | | 4,450 | |
| Current Gaps | | | 5,789 |

Data Sources: 1) Providence Anti-Displacement and Affordable Housing Strategy; 2) Comprehensive Housing Affordability Strategy (CHAS 2015-2019)

Homeless Needs Inventory & Gap Analysis Discussion (City of Providence)

The City of Providence plays a significant role in serving the state's homeless community, many of whom reside within City limits. In 2022 there were 1,190 unique individuals served by Providence based shelters. This does not include non-continuum projects or domestic violence providers. While the total is often fluctuating, the Continuum of Care reported a count of 333 shelter beds in Providence (exclusive of DV or special population shelters).

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

A significant subset of the greater Providence community are members of the qualifying populations ("QP") for the purposes of this HOME-ARP program.

QP1 - Sheltered and Unsheltered Homeless Population ("Homeless" Paragraphs 1-3 as defined in CPD-21-10):

As the center for the delivery of homeless services in the state, many persons experiencing homelessness access services and shelter in Providence. While it is difficult to ascertain the exact number of persons experiencing homelessness in Providence, the statewide data collected in the annual Point-In-Time (PIT) Count shows a troubling growth in homelessness state-wide. The 2021 PIT Count tallied 1,267 persons experiencing homelessness on a sample night – an increase of 14% over the 1,104 persons counted in 2020. (Note that the Homeless Needs Inventory and Housing Needs Inventory tables above reflects statewide data. According to a 2021 report from the Rhode Island Coalition to End Homelessness to the Providence City Council Housing Crisis Task Force, Providence clients consistently comprise approximately 40% of those experiencing homelessness in HMIS.)

Unsheltered homelessness was up to an even greater degree, with 181 unsheltered homeless persons counted in 2021 – an increase of 66% over the 108 unsheltered persons counted in 2020. There was also a 57% increase in chronic homelessness – from 226 in 2020 to 357 in 2021. Veteran homelessness also increased, with 97 veterans counted in 2021 – up from 90 in 2020. Advocates frequently note that the Point-In-Time count underrepresents the true picture of

homelessness in Rhode Island (i.e. fails to count those who are doubled up or in hotels/motels)—highlighting a larger universe of need than is reflected in the available data. The updated 2022 Point-in-Time Count reflects an even starker reality. Unsheltered homeless persons increased from 181 in 2021 up to 248, homeless veterans increased from 97 in 2021 to 113, and an even sharper increase was seen in those experiencing chronic homeless, from 357 in 2021 to 497 (a jump of another 40%).

The composition of Rhode Island’s homeless population highlights the continuing need for equal access to housing. While Black individuals and families make up around 10% of Rhode Island’s population, nearly a third of homeless persons identify as Black. While only 3% of the state identifies as mixed-race, 16% of the families experiencing homelessness were mixed-race. In Rhode Island’s general population, roughly 16% of households identify as Hispanic or Latino - over a third of families experiencing homelessness identify as Hispanic or Latino (36%). The data also demonstrates the challenges facing young people - nearly 23% of homeless persons counted were under 18 years old.

QP2 - At Risk of Homelessness (as defined in CPD-21-10):

In addition to the growing population of homeless individuals, many Providence residents remain at-risk of homelessness as the housing market in the city has become increasingly unaffordable. A significant number of Providence tenants are at risk of being evicted – the mid-January Census Bureau Household Pulse Survey reports that nearly 1 in 5 Rhode Island renters (19%) is currently behind on rent. Average rental rates have increased in Providence – from \$1,527 in the first quarter of 2020, to \$2,343 in the first quarter of 2023 (a 53% increase) - while vacancy rates have stubbornly remained between 2.6 and 2.8% over that same period of time. (St. Louis Federal Reserve ALFRED citing US Census; RentCafe; HousingWorks Rhode Island 2022 Housing Fact Book)

With 29.2% of the City’s households at or below 30% of area median income, those 17,975 households represent a staggering number of Providence residents who are currently housed but at risk of homelessness. Around half of these households – 8,965 – have at least one of four “severe housing problems” (i.e. household lacks adequate kitchen facilities or plumbing, is experiencing severe overcrowding, or is experiencing severe cost burden). As detailed in the City’s 2020-2024 Consolidated Plan, the age of the City’s housing stock – with nearly 60% of all housing units constructed before 1950 - creates risk for low-income families, who often face the choice of living in aging, unsafe housing or no housing at all. The age and condition of housing units available creates a further barrier to rehousing with federal resources (which have mandated rent limits and minimum property standards).

Households living at or below 30% of AMI were also a large majority of those who applied for rental assistance through the Rent Relief RI program – 71% of all awarded households live at or below 30% of AMI. Female headed households were also a large majority of those awarded –

68%. With nearly a third (28%) of all awards going to households that identified as mixed race, 40% of households identified as White, 35% identified as Hispanic, and 20% identified as Black.

QP3 - Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking (as defined in CPD-21-10):

One of many challenges emerging from the COVID-19 pandemic was the dramatic increase in individuals seeking help for domestic violence. In Rhode Island, the statewide Coalition Against Domestic Violence received 17,690 calls to hotlines / helplines in 2020 – a 13% increase from the 15,623 calls received in 2019, and a 34% increase from just four years ago.

In Providence, the nonprofit Sojourner House - which provides hotline services, transitional housing programs, and Safe House programs – saw a similar increase in clients and demand for services. Total clients in 2020 increased 10% to 1,131 from 2019, when 1,020 clients were assisted by Sojourner House; total supportive housing bed nights similarly increased to 47,008 – up 9% from the 43,968 supportive housing bed nights provided in 2019. In 2022, clients seeking assistance at Sojourner House’s Drop-In Center reflected the community’s tremendous diversity – 20% identified as Latino, 19% identified as Black/African American, and 7% identified as Multi-Racial. While the National Human Trafficking Hotline is typically referred 10 cases a year in Rhode Island, those numbers have been growing as well - averaging nearly 15 cases a year since 2018, with 16 new cases referred in 2021.

QP4 - Other Populations Requiring Services or Housing Assistance to Prevent Homelessness, and Other Populations At Greatest Risk of Housing Instability (as defined in CPD-21-10):

A number of Providence households require services or housing assistance to prevent homelessness – or are at the greatest risk of housing instability, per the HOME-ARP definitions of qualifying populations. Currently 11,160 renter households and 3,540 owner households pay over 50% of their gross annual income for housing, meaning 23.9% of the City’s households are HUD-defined as “severely cost burdened”.

The need for assistance to these households to avoid homelessness is demonstrated by the “Rent Relief RI” program – where over 7,500 Providence households have applied for over \$54,000,000 in one-time rental assistance. Over 85% of those applications were made by households at or below 50% AMI. Around one-third of households (35%) awarded a Rent Relief grant identified as Latino; 40% of awards were made to White households, 26% to Multi-Racial households, and 20% to Black households. Just over two-thirds of awards (68%) were given to Female headed households.

Veterans are among the groups at highest risk of housing instability, with roughly 31% of veterans in Rhode Island paying more than 30% of their income towards housing costs (Veterans Data Central).

A significant, but harder to calculate, number of Providence residents face homelessness as a result of exit from a temporary hotel or motel, as they age out of youth services with no place to

go - or are living in another person's home ("doubling up") as a result of economic hardship. Combining financial assistance (diversion or housing "problem-solving" funding) with appropriate services has proven to be the most effective method at keeping those at risk of housing instability from becoming homeless.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

QP1 - Homeless (as defined in CPD-21-10):

Shelter Units: The roughly 333 shelter beds in Providence are part of the current resources available to the Homeless population. Within Providence city limits, Crossroads Family Shelter is the only shelter for families, while a handful of shelters for individuals operate around the City. As the Homeless Needs Inventory table demonstrates, there are currently 850 shelter units and 170 transitional housing units statewide.

Recently, the State's Consolidated Homeless Fund allocated \$1.4M in additional funds to expand shelter capacity – 75 new shelter or transitional housing units will result from this investment. Temporary winter warming stations – such as the recently opened Cranston Street Armory -are also occasionally available to this QP1 in inconsistent and weather-driven situations.

Supportive Services: In collaboration with the Rhode Island Continuum of Care and the Consolidated Homeless Fund, the City uses federal Emergency Solutions Grants to support outreach efforts and case management services to connect the unsheltered homeless population with emergency shelter, permanent housing, and the supportive services necessary to maintain their housing. The City funds essential services, including street outreach, through which providers seek out and engage homeless persons living on the streets or in encampments.

Tenant Based Rental Assistance: The Rent Relief RI program was the largest tenant based rental assistance program available to Providence residents outside of public housing programs. However, it was a one-time program ending in 2022 – no similarly robust rent assistance program exists at either the state or local level with capacity to accept applications.

Members of the homeless QP1 are eligible for some rental assistance in the current landscape of resources – but it is highly limited, and largely subscribed/over-subscribed. The City's HOPWA entitlement funding currently supports 32 households living with HIV/AIDS in the Providence/Fall River/New Bedford Metropolitan Statistical Area with tenant-based rental assistance – with over 300 households on the waitlist. The City's Emergency Housing Voucher Dashboard tells a similar story – 90% of EHV vouchers are currently being used in leased units, with only a handful remaining to be placed (4) out of the entire allotment of vouchers (42).

Permanent Supportive Rental Housing: While there are Permanent Supportive Housing units in Providence among the currently available resources, there are not enough units to meet the need - especially the need of the Homeless QP1. Long-term permanent supportive housing paired with wrap-around services has long been established as the best practice for ending the cycle of homelessness.

Throughout Rhode Island, HUD counted 1,308 permanent supportive housing units in 2022 – many of those units are in Providence (HUD Housing Inventory Count Report). At the end of 2022, there were 10,347 households on the Providence Housing Authority’s Centralized Wait List; 1,446 households were also on the Project Base Vouchers Wait List (households can be on both lists). Those waiting for housing in Providence reflect the City’s diversity, with 28% identifying as Black, 40 and 40% identifying as Hispanic.

QP2 - At risk of Homelessness (as defined in CPD-21-10):

Shelter Units: All of the 333 shelter beds in Providence are part of the current resources available to those who are At risk of Homeless. Within Providence city limits, Crossroads Family Shelter is the only shelter for families, while a handful of shelters for individuals operate around the City. There are currently 850 shelter units and 170 transitional housing units statewide.

Recently, the State’s Consolidated Homeless Fund allocated \$1.4M in additional funds to expand shelter capacity – 75 new shelter or transitional housing units will result from this investment. Temporary winter warming stations – such as the recently opened Cranston Street Armory, are also occasionally available if needed by members of QP2 in inconsistent and weather-driven situations.

Supportive Services: The City’s Community Development Division funds a wide array of neighborhood-based support and social community services that are available to those in QP2 – At risk of Homelessness. From food pantries to job training to housing navigation to eviction defense legal services – Providence has a network of support services among the current resources. While a diversity of services is offered in a variety of languages targeted to neighbors of all abilities and ages, there is an immeasurable need that cannot be met by the currently available resources.

Tenant Based Rental Assistance: The Rent Relief RI program was the largest tenant based rental assistance program available to Providence residents outside of public housing programs. However, it was a one-time program ending in 2022 – no similarly robust rent assistance program exists at either the state or local level with capacity to accept applications.

Those At risk of Homelessness (QP2) are eligible for some rental assistance in the current landscape of resources – but it is highly limited, and largely subscribed/over-subscribed. The City’s HOPWA entitlement funding currently supports 32 households living with HIV/AIDS in the Providence/Fall River/New Bedford Metropolitan Statistical Area with tenant-based rental

assistance – with over 300 households on the waitlist. The City’s Emergency Housing Voucher Dashboard tells a similar story – 90% of EHV vouchers are currently being used in leased units, with only a handful remaining to be placed (4) out of the entire allotment of vouchers (42).

Permanent Supportive Rental Housing: While there is some stock of Permanent Supportive Housing in Providence among the currently available resources, there are not enough units to meet the need of those At risk of Homelessness (QP2). When it is available, members of this QP2 would typically qualify for those income-restricted units.

Throughout Rhode Island, HUD counted 1,308 permanent supportive housing units in 2022 – many of those units are in Providence (HUD Housing Inventory Count Report). At the end of 2022, there were 10,347 households on the Providence Housing Authority’s Centralized Wait List; 1,446 households were also on the Project Base Vouchers Wait List (households can be on both lists).

QP3 – Fleeing or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking (as defined in CPD-21-10):

Shelter Units: In addition to the shelter units available the community at large mentioned above, there are additional shelter resources in Providence for the members of QP3 – those fleeing or attempting to flee dating and domestic violence, sexual assault, stalking or Human Trafficking. A number of DV specific shelters operate specifically to serve the vulnerable members of QP3, operated under a separate waitlist and administration from the general Continuum of Care shelter waitlist.

Supportive Services: While the same supportive services available to the entire community are available to members of QP3, this qualifying population faces unique challenges in accessing assistance. To meet these unique needs, there are a number of service providers who offer targeted help – relocation assistance, counseling, childcare and family supports – to those attempting to flee violent situations.

Tenant Based Rental Assistance: Some limited rental assistance – including security deposits and rental subsidies – can be accessed as part of the suite of services available to some members of QP3. These resources are not part of any systemic approach to meeting rental assistance needs, but rather are utilized in limited emergency situations to a small number of potentially eligible community members.

Permanent Supportive Rental Housing: In addition to the Permanent Supportive Housing units mentioned above, a handful of nonprofits in Providence also operate housing that is set aside for members of this QP3. These handful of projects are sprinkled throughout the City in anonymous locations but fall far short of meeting the long-term housing and support needs of this QP3.

QP4 – Other Populations Requiring Services or Housing Assistance to Prevent Homelessness, and Other Populations At Greatest Risk of Housing Instability (as defined in CPD-21-10):

Shelter Units: While all of the shelter resources listed above are theoretically available to Other Populations Requiring Services or Housing Assistance to Prevent Homelessness, and Other Populations At Greatest Risk of Housing Instability (QP4) are the least likely of the qualifying populations to access those resources. Since those who have been homeless the longest or who have the highest acuity are most often prioritized through the Centralized Wait List, a family at risk but not yet homeless would be less likely to receive a shelter bed as they enter homelessness.

Supportive Services: The City's Community Development Division funds a wide array of neighborhood-based support and social community services that are available to those in QP4 – Other Populations Requiring Services or Housing Assistance to Prevent Homelessness, and Other Populations At Greatest Risk of Housing Instability. From food pantries to job training to housing navigation to eviction defense legal services – Providence has a network of support services among the current resources. While a diversity of services is offered in a variety of languages targeted to neighbors of all abilities and ages, there is an immeasurable need in this qualifying population that cannot be met by the currently available resources.

Tenant Based Rental Assistance: The Rent Relief RI program was the largest tenant based rental assistance program available to Providence residents outside of public housing programs. However, it was a one-time program ending in 2022 – no similarly robust rent assistance program exists at either the state or local level with capacity to accept applications.

Other Populations Requiring Services or Housing Assistance to Prevent Homelessness, and Other Populations At Greatest Risk of Housing Instability (QP4) are eligible for some rental assistance in the current landscape of resources – but it is highly limited, and largely subscribed/over-subscribed.

The City's HOPWA entitlement funding currently supports 32 households living with HIV/AIDS in the Providence/Fall River/New Bedford Metropolitan Statistical Area with tenant-based rental assistance – with over 300 households on the waitlist. The City's Emergency Housing Voucher Dashboard tells a similar story – 90% of EHV vouchers are currently being used in leased units, with only a handful remaining to be placed (4) out of the entire allotment of vouchers (42).

Permanent Supportive Rental Housing: While there is some stock of Permanent Supportive Housing in Providence among the currently available resources, there are not enough units to meet the need of those Other Populations Requiring Services or Housing Assistance to Prevent Homelessness, and Other Populations At Greatest Risk of Housing Instability (QP4). When it is available, members of this QP4 would often qualify for those income-restricted units.

Throughout Rhode Island, HUD counted 1,308 permanent supportive housing units in 2022 – many of those units are in Providence (HUD Housing Inventory Count Report). At the end of 2022,

there were 10,347 households on the Providence Housing Authority's Centralized Wait List; 1,446 households were also on the Project Base Vouchers Wait List (households can be on both lists).

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations (as defined in 24 CFR 91.5);***
- ***Those currently housed populations at risk of homelessness (as defined in 24 CFR 91.5);***
- ***Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking (as defined by HUD in the HOME-ARP Notice);***
- ***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability (as defined by HUD in the HOME-ARP Notice).***

Sheltered and Unsheltered Homeless Population:

While it is clear that Providence needs more shelter beds to meet the needs of sheltered and unsheltered homeless persons in the City, equally important is that shelter beds are provided in a low-barrier, accessible manner. Shelter is a critically unmet need, as are other service needs that have limited availability at present.

Services such as mental health stabilization and on-going support, addiction treatment and management, benefits counseling, access to healthy food, clean water and toilet/shower facilities, storage for belongings and care for pets, and necessities/clothes are all difficult for unsheltered groups to access and may serve as a barrier to shelter utilization when beds are available.

While the state's efforts to increase emergency resources is important to ensure dignity to those facing homelessness, creating enough permanent supportive housing to meet the long-term needs of the Homeless is the avenue by which Rhode Island can truly end homelessness. This approach was echoed in the comments of many providers consulted – even and especially those who do not provide permanent supportive housing. The consensus is clear – more PSH is needed.

Currently Housed at Risk of Homelessness:

For Rhode Island's 32,000 low-income renters, housing instability is part of their daily lives – 74% are rent burdened (paying more than 30% of their income towards rent), and 54% are severely rent burdened (paying more than 50% of their income towards rent). This basic financial instability increases the risk of homelessness for those who are currently housed. At the time of publication of the City's Anti-Displacement and Comprehensive Housing Strategy, there were 5,800 more households earning less than 30% AMI than exists rental units priced appropriately. Similar to the other qualifying populations, the need to more affordable housing is a major unmet need for households who are presently housed but at a high risk for homelessness.

Families living with housing instability have unique unmet service needs, though many of the same services needed by those experiencing homelessness are again required here – job training and placement, mental health stabilization and on-going support, low-or no-cost childcare, addiction treatment and management, benefits counseling, and food access. Financial counseling is not often offered in languages or in a nature or location accessible to Providence’s low-wage households, and rental assistance programs are under-resourced. Ensuring that these services are properly-resourced, accessible and provided in a culturally competent manner – will ensure that their impact on housing unstable families is maximized.

Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking:

While affordable housing and the wrap-around services described as needs for the other qualifying populations are also desperately needed by those fleeing violence and/or human trafficking, this population also has unique and specialized shelter and service needs. Domestic violence shelters provide a safe haven that allows victims to turn their lives in a new direction; without a safe space to recover and reset, many victims remain stuck in brutal cycles of violence and abuse. Providence has excellent domestic violence service organizations – scaling and duplicating their success in providing shelter, transitional, and permanent housing would meet a vital unmet need. Family counselors, trauma-informed social workers, legal advocates and housing navigation case managers are all essential members of the team needed to care for victims of violence and human trafficking effectively.

Other Populations Requiring Services or Housing Assistance to Prevent Homelessness / At Greatest Risk of Housing Instability:

More affordable housing is the most urgent unmet need of those needed services or housing to prevent homelessness or who are at the greatest risk of housing instability. Additionally, this population has unique needs that are presently unmet that could be alleviated with HOME-ARP eligible services. Frequently highlighted in the consultation and public feedback process was the need for more affordable transportation options in Providence, especially for those who have physical disabilities. Career counseling and apprenticeship programs to boost earned income were also cited as a need for this group – as was access to affordable health care.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

As the data illustrates, there remains a significant gap in the transitional and shelter housing available to homeless persons – and the growing need in the state of Rhode Island. A snapshot of the Shelter Que in HMIS pulled from the Coordinated Entry System in August 2022 counted 1,101 individual people in need of a shelter bed throughout the state of Rhode Island. The 2022 State of Homelessness in Rhode Island report cited a gap of 66 emergency housing units for

families in an average month, and a gap of 137 emergency housing units for adults without children in an average month.

Within the City's inventory of housing, there are large gaps in affordability and accessibility – as well as a dearth of permanent supportive housing units. These gaps are on track to increase as the City's population continues to trend older and lower income, as the number of households experiencing homelessness continues to grow, and as Providence's housing stock continues to age.

Not only did the City's Anti-Displacement and Comprehensive Housing Strategy show that the City needs to produce more than 7,300 units by 2030 to meet the needs of households living at or below 30% AMI – it needs to produce them in different neighborhoods, and in different configurations than currently available. At present, affordable units are concentrated in just a few low-income neighborhoods (Olneyville/Hartford and Broad Street/ Elmwood) – and there are very few 3+ bedroom affordable family units at all. The lack of affordability – and the lack of neighborhood choice – are both significant gaps in the current and future housing inventory.

Providence is fortunate to have a strong network of partners who provide direct services to the members of the HOME-ARP qualifying populations. The services these partners deliver are innovative and effective, and typically reflect the best practices in meeting a wide variety of difficult-to-address needs. The largest gap in the service delivery system is the need to scale these services to meet the needs of everyone who qualifies for them. In addition to scaling proven and effective services, continued improvement in the coordination and delivery of case management and wraparound services is necessary to ensure successful tenancies and to alleviate logjams in client placements.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definitions of “other populations” as established in the HOME-ARP Notice:

The City will not include these conditions in its definition of “other populations”.

Identify priority needs for qualifying populations:

QP1 - Homeless:

Safe and secure shelter for all those experiencing homelessness in Providence is a priority need – though the form that shelter takes will vary based on each individual or family's unique situation. The housing first model practiced in Providence has shifted emphasis away from traditional shelter beds towards transitional and permanent supportive housing, where a greater degree of support can be provided in a more stable environment. Outreach services – particularly mobile and other innovative approaches to homeless outreach – continue to be essential to

reaching people where they are at. The linkage this outreach provides to the City's many available services to help lift households out of chronic homelessness is much needed.

QP2 - At risk of Homelessness:

With so many of Providence's low-income households so severely cost-burdened, the priority need is for greater housing choice – more affordable housing units, spread throughout more neighborhoods. More supportive housing units are also a priority need for those who are currently housed but at risk of homelessness – especially for the elderly, people living with disabilities, and those who will soon exit an institutional setting. Services that help lower the risk of becoming homeless are also a high priority need for the City – including financial and rental assistance, housing quality improvement programs, tenant education and legal eviction defense services, and on-going case management are just some of the priority needs to keep people housed.

QP3 – Fleeing or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking:

For those who are attempting to flee domestic violence or escape from human trafficking, finding safe and secure shelter remains a priority need. Mental health counseling and other emotional support services are also a priority need, especially where those supports can be provided as part of providing safe and secure shelter. Transition and bridge housing is critical to help move a family from crisis towards stability and independence – especially when that housing is coupled with childcare, employment assistance and job training, case management, and other social services targeted to the unique needs of those trying to escape violence or trafficking.

QP4 – Other Populations Requiring Services or Housing Assistance to Prevent Homelessness, and Other Populations At Greatest Risk of Housing Instability:

Increasing the supply of deeply affordable housing is a priority need for those at the greatest risk of housing instability and those who require services or assistance to prevent homelessness. Many of the households at risk of housing instability would significantly reduce their risk by living in a more price appropriate home and thereby becoming less severely cost-burdened. Additional financial and rental assistance can help relieve their cost burden as well – as can greater access to tenant assistance and legal eviction defense, all of which are priority needs. Like other qualifying populations, increased access to childcare, employment assistance and job training, benefits counseling, case management, and mental health services are all central to increasing housing stability.

Explain how the PJ determined the level of need and gaps in the shelter and housing inventory and service delivery systems based on the data presented in the Plan:

To determine the level of needs and gaps in the City's shelter and housing inventory and service delivery systems, multiple data sources were referenced, including (but not limited to): the state of Rhode Island's Homeless Management Information System – including the 2021 & 2022 Point in Time Count and Housing Inventory Count; American Community Survey and Comprehensive Housing Affordability Strategy data; the City of Providence's 2021 Anti-Displacement and Comprehensive Housing Strategy; HousingWorks Rhode Island 2021 & 2022 Housing Factbook; Opening Doors – Rhode Island's Strategic Plan to End Homelessness; and annual reports from service providers.

The interpretation of the data to determine the level of needs and gaps was done in collaboration and with input from a variety of stakeholders. Service providers and development partners, advocates for the homeless and low-income families, members of the general public, and experts and thought leaders in the industry provided key context to the data - as well as suggestions of creative ways to fill the gaps and meets client needs. The collaborative work of the State's Continuum of Care – of which the City is an active and participating member – was also instructive to help identify local gaps and inform local strategies to meeting client needs.

HOME-ARP ACTIVITIES

Describe the methods that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients, and/or contractors:

City solicits project partners (subrecipients or developers) annually through issuance of a Request for Applications (RFA) for its various entitlement funds. In limited instances (typically in response to an acute need), the City may also solicit for a vendor or contractor to deliver a specialized service through its Board of Contract and Supply.

Proposals submitted in response to the City's RFA for these HOME-ARP funds will be evaluated in an objective fashion. Funds will be awarded to the most competitive projects. Criteria for funding will be detailed at length in each RFA – and will include the degree to which the proposal meets the needs and fills the gaps in housing, shelter, services for the qualifying populations; the sponsor's current capacity for and previous track record of successful completion of similar projects or programs; and the financial feasibility of the proposal.

Finally, projects will be evaluated based on their ability to comply with the regulations governing – and their ability to further the goals of – the HOME-ARP program. Groups with demonstrated experience successfully administering federal contracts will be prioritized given the importance of the work and the short program timeline.

Describe whether the PJ will administer eligible activities directly:

The City will not administer any activities directly.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP Allocation Plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Not applicable.

Use of HOME-ARP Funding Table

| | Funding Amount | Percent of the Grant | Statutory Limit |
|--|-----------------------|-----------------------------|------------------------|
| Supportive Services | \$1,482,605.00 | 25% | |
| Acquisition and Development of Non-Congregate Shelters | \$0.00 | 0% | |
| Tenant-Based Rental Assistance (TBRA) | \$0.00 | 0% | |
| Development of Affordable Rental Housing | \$3,558,252.00 | 60% | |
| Non-Profit Operating | \$0.00 | 0% | 5% |
| Non-Profit Capacity Building | \$0.00 | 0% | 5% |
| Administration & Planning | \$889,563.00 | 15% | 15% |
| Total HOME-ARP Allocation | \$5,930,420.00 | | |

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The largest percentage of HOME-ARP funds will be set aside for the development of affordable rental housing and/or permanent supportive housing - \$3,558,252 or roughly 60% of the total allocation. A similar, large investment (\$1,482,605 or around 25% of the allocation) in social and support services is being proposed here.

An allowable 15% of the budget, or \$889,563, will support City planning, execution, and long-term monitoring of the Providence HOME-ARP program.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the Plan to fund eligible activities:

All data sources – and perhaps more importantly the greater Providence community at-large – loudly called out the need for more affordable and permanent supportive housing in the City. The largest gap identified in the current housing and service system is the lack of affordable housing. The bulk of the HOME-ARP allocation will go towards meeting the need for more affordable and supportive housing.

However, housing alone won't meet the various and complex needs of the qualifying populations, requiring that social and support services be provided as well. While many, many respondents highlighted housing as the primary need for the community, there was also consensus throughout the outreach process that a greater level of support services is also needed.

These priorities, as reflected in the allocation plan budget, reflect the recommendations of many reports and data points - and the testimony of experts, advocates, clients, providers, developers, and citizens of Providence.

HOME-ARP PRODUCTION GOALS

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

With \$4M allocated towards the development of affordable and permanent supportive housing, Providence is expecting to directly develop between 15-20 units, with a per unit cost in the range of \$100,000 - \$300,000.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

While the HOME-ARP housing production goals won't solve the affordability crisis in the City of Providence, 15-20 new units of affordable housing directly addresses the most significant gap in the current system of housing, shelter, and support services. These units may be made available to a range of low-incomes – and will likely also include units designed to serve special populations, including families with children, seniors, transitional aged youth or other group in need of wrap-around support services. Additionally, with numerous other new funding sources coming online around the state, these HOME-ARP affordable housing funds will almost certainly be paired leverage other sources of both subsidized and private capital to maximize the impact of these funds.

PREFERENCES

Describe whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

The City of Providence will allow the use of preferences in rental housing development, but not in the delivery of HOME-ARP supportive services. Developers are responsible for ensuring that all projects comply with any and all HOME-ARP preference requirements.

Rental Housing Development:

Rental housing units created with HOME-ARP funds can elect to establish a preference for the following Qualified Populations when administering each project's HOME-ARP waitlist:

- QP1 - Homeless; and
- QP3 - Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking.

These preferences may be utilized provided that the project proposal demonstrates compliance with fair housing, civil rights and nondiscrimination requirements - and does not exclude any qualifying populations.

If developers elect to utilize preferences for both QP1 and QP3 for a project, QP1 shall be prioritized before QP3. If there are no qualified members of QP1 or QP3 available, QP2 shall be prioritized before QP4.

Once a preference has been applied all units will be awarded to each project's HOME-ARP waitlist in chronological order.

Supportive Services:

Supportive service programs shall be available to all qualifying populations via first come first serve waitlist or on a rolling basis; no preference or limitation is being made with regards to HOME-ARP supportive service programs.

HOME-ARP projects that also partner with the Coordinated Entry system will apply preferences and methods of prioritization in accordance with the preferences and prioritization established in this Allocation Plan - not by the Coordinated Entry system's standard preferences and priorities.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Rental Housing Development:

Funding HOME-ARP rental housing for families and individuals experiencing homelessness in QP1 and those fleeing dating, domestic and other family, stalking, and sexual violence in QP3 has been identified as the highest priority system need. Stable, affordable housing is the most effective intervention to resolve homelessness and stabilize families in crisis trying to leave unsafe dating, stalking, trafficking, or sexual violence scenarios. For this reason, the City shall permit developers to provide a preference in new housing opportunities to the households in QP1 and QP3. This preference will allow the City to start to bridge the disproportionately large gap in stable, affordable housing faced by these unique qualifying subpopulations.

In rental housing developments that choose to give preferences, the needs for the other two Qualifying Populations – QPs 2 and 4 - will be addressed via the City's investments in multifamily affordable housing developments through annual HOME and the Providence Housing Trust allocations. It is anticipated that these developments will leverage additional state and federal funds, including the \$180M in competitive funding recently released through Rhode Island Housing and project-based vouchers issued annually through the Providence Housing Authority.

REFERRAL METHODS

Identify the referral methods the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program.

The City of Providence will allow the use of Coordinated Entry (including CE-DV) + Other Referral Methods for its HOME-ARP projects and activities.

The Rhode Island statewide Coordinated Entry System prioritizes clients by acuity – i.e. prioritizes those with longest histories of homelessness and highest service needs.

After applying any elected preference, HOME-ARP projects will administer their HOME-ARP waitlists in chronological order.

RI CES does not include all HOME-ARP qualifying populations, so the City will require that housing providers use other supplemental referral methods that accept all qualifying populations. Those supplemental referral methods must be clearly identified in the project proposal. The City will only use CE for intake to add the eligible applicant to the HOME-ARP written waiting list administered by each project.

Rental Housing

For HOME-ARP rental units, the City will require the developer to use Coordinated Entry, the parallel and confidential CES DV Coordinated Entry System – plus another referral methods that ensure access to all QPs - to fill units created through HOME-ARP.

Each rental housing project awarded HOME-ARP funds will be required to have a Tenant Selection Plan that describes how the developer will work with CES and describe any other referring service agency as applicable, to identify appropriate qualified households.

A Memorandum of Agreement between the developer and the CES system will be required and will describe the referral procedures for each HOME-ARP project.

Supportive Services

The City will permit supportive service providers to serve clients through rolling enrollment or via waitlist; use of CES is not required.

If the PJ intends to use the Coordinated Entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all the qualifying populations eligible for the project or activity will be covered:

The City of Providence will allow the use of Coordinated Entry (including CE-DV) + Other Referral Methods for its HOME-ARP projects and activities.

RI CES does not include all HOME-ARP qualifying populations, so the City will require providers to use other supplemental referral methods that accept all qualifying populations. Those supplemental referral methods must be clearly identified in the project proposal.

For HOME-ARP rental units, the City will require the developer to use Coordinated Entry, the parallel and confidential CES DV Coordinated Entry System – plus a supplemental referral method proposed by the developer that ensures access to all QPs – to fill units created through HOME-ARP.

Each rental housing project awarded HOME-ARP funds will be required to have a Tenant Selection Plan that describes how the developer will work with CES and describe any other referring service agency as applicable, to identify appropriate qualified households.

A Memorandum of Agreement between the developer and the CES system will be required and will describe the referral procedures for each HOME-ARP project.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE:

The PJ intends to utilize CE + other referral methods. CE will not be used for direct referrals into HOME-ARP projects. The City will only use CE for intake to add the eligible applicant to the HOME-ARP written waiting list administered by each project.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any:

Once any elected preferences are established and applied, HOME-ARP projects should prioritize applicants in chronological order.

Each rental housing project awarded HOME-ARP funds will be required to have a Tenant Selection Plan that describes how the developer will work with CES - and any other referring service agency as applicable - to identify appropriate qualified households.

The Plan should include details on how the project waitlist will operate – including how the waitlist will work with respect to preferences and referrals from the Coordinated Entry system.

The Memorandum of Agreement between CES and the developer should reflect any method of prioritization to be used between the different referral mechanisms for the project.

LIMITATIONS IN A HOME-ARP RENTAL HOUSING OR NCS PROJECT

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the HOME-ARP Notice:

The City does not intend to limit eligibility for HOME-ARP activities to a particular Qualifying Population or specific subpopulation. Preferences (as stated above) may be established; however, no population shall be excluded from eligibility.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

No limitation identified; not applicable.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation

through the use of the HOME-ARP funds (i.e. through another of the PJ's HOME-ARP projects or activities):

No limitation identified; not applicable.

HOME-ARP REFINANCING GUIDELINES

Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.

Not applicable; City will not use HOME-ARP for refinancing activities.

Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.

Not applicable.

State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.

Not applicable.

Specify the required compliance period, whether it is minimum 15 years or longer.

Not applicable.

State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

Not applicable.

Other requirements in the PJ's guidelines, if applicable:

Not applicable.