

City of Providence, Rhode Island

Jorge O. Elorza, Mayor

Department of Planning and Development

Bonnie Nickerson, Director

Emily Freedman, Director, Division of Community Development



2021 DRAFT Consolidated Annual Performance and Evaluation Report (CAPER)

*Community Development Block Grant
HOME Investment Partnerships Program
Housing Opportunities for Persons with AIDS
Emergency Solutions Grant*

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a):

The City of Providence is designated an Entitlement Community by the U.S. Department of Housing and Urban Development (HUD). Through this designation, the City receives annual funding from the following four programs: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). These funds assist the City in creating viable urban communities through the provision of quality affordable housing, creating suitable living environments, and expanding economic opportunities for the City's low- and moderate-income residents.

The specific strategies the City is to undertake are detailed in the City's Consolidated Plan and Annual Action Plans. These plans identify the City's housing, community, neighborhood, and economic development needs, prioritize those needs, and develop goals and strategies regarding how funding will be allocated to eligible housing and community development activities to meet the City's priority needs. Reporting on progress towards completing projects and initiatives as identified through these Plans is completed through a Consolidated Annual Performance and Evaluation Report (CAPER) which details how the City has spent its federal funds and whether or not the City is meeting the goals identified.

This CAPER is a report on the accomplishments and progress made towards addressing annual and five-year goals for Program Year 2021 (July 1, 2021 - June 30, 2022). Program Year 2021 (hereafter referred to as "PY21") was the 2nd year of the 2020-2024 Consolidated Plan period. Additionally, this CAPER also captures many CARES Act-funded disaster relief activities. This data is attached as a supplemental table, and includes beneficiaries of COVID-19 related programs that were ongoing through the program year.

In PY21, the City identified a number of goals and objectives in its Action Plan that it would accomplish in the year with HUD funds. It is important to note that this PY21 CAPER is a living document due to the need to extend a number of contracts past the traditional federal program year end date of June 30, 2022 to enable successful completion of construction projects, housing projects or service programs. Accomplishments from activities having reached completion are reported in the tables to follow. It's important to note that in instances where "Actual" totals are zero or less than anticipated, it is predominately because a project is not yet complete and beneficiaries were not yet reported in the HUD Integrated Disbursement & Information (IDIS) system. This is common for construction projects occurring during summer/fall season, job creation activities, and housing rehab/construction activities. In very limited instances (ex. downpayment assistance program), market impacts resulted in an overall reduction in program utilization and accomplishments did not align with projected goals. In such cases, amendments to goals may be warranted.

A progress report on these PY21-funded projects follows. Table 1 reflects accomplishments reported within the July 1, 2021 – June 30, 2022 program period; Table 2 reflects cumulative accomplishments through Year 2 of the ConPlan (Strategic Plan).

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Table 1 - Accomplishments - Program Year

Goal	Category	Outcome				
Effectively Administer Programs	Other - Program Administration	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Other	1	1	Other	100.00 %
Facilitate Small Business Development and Growth	Non-Housing Community Development	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Jobs created/retained	38	30	Jobs	78.95 %
		Businesses assisted	116	78	Businesses Assisted	67.24 %
Improve Condition of Public Facilities	Non-Housing Community Development	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	44891	11697	Persons Assisted	26.06 %
Improve Parks and Recreational Areas	Non-Housing Community Development	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	10065	7730	Households Assisted	76.80 %
Improve Quality of Occupied Housing Units	Affordable Housing	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Rental units rehabilitated	409	0	Household Housing Unit	0.00 %
		Homeowner Housing Rehabilitated	25	11	Household Housing Unit	44.00 %

Improve Streetscapes & Public Infrastructure	Non-Housing Community Development	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	30000	0	Persons Assisted	0.00 %
Increase Availability of Affordable Housing	Affordable Housing	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Rental units constructed	33	0	Household Housing Unit	0.00 %
		Rental units rehabilitated	0	0	Household Housing Unit	0 %
		Homeowner Housing Added	5	2	Household Housing Unit	40.00 %
		Homeowner Housing Rehabilitated	0	0	Household Housing Unit	0 %
Increase Housing Stability among PLWHA	Non-Homeless Special Needs	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Public service activities other than Low/Moderate Income Housing Benefit	50	266	Persons Assisted	532.00 %
		Tenant-based rental assistance / Rapid Rehousing	25	32	Households Assisted	128.00 %
		HIV/AIDS Housing Operations	53	49	Household Housing Unit	92.45 %
Provide for Basic Needs of LMI Persons	Non-Housing Community Development	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Public service activities other than Low/Moderate Income Housing Benefit	34024	16814	Persons Assisted	49.42 %

		Public service activities for Low/Moderate Income Housing Benefit	20	0	Households Assisted	0.00 %
		Homeless Person Overnight Shelter	0	0	Persons Assisted	0 %
Reduce Homelessness	Homeless	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Public service activities other than Low/Moderate Income Housing Benefit	1453	1259	Persons Assisted	86.65 %
		Tenant-based rental assistance / Rapid Rehousing	52	49	Households Assisted	94.23 %
Return Abandoned Property to Productive Reuse	Affordable Housing	Indicator	Expected	Actual	Unit of Measure	Percent complete
		Homeowner Housing Rehabilitated	2	0	Household Housing Unit	0.00 %

Table 1 - Accomplishments – Program Year

Table 2 - Accomplishments - Strategic Plan to Date

Goal	Category	Funding		Outcome				
Effectively Administer Programs	Other - Program Administration	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$5,039,951.00	Other	5	1	Other	20.00 %
		HOPWA	\$205,038.00					
		HOME	\$756,827.00					
		ESG	\$159,479.00					
Facilitate Small Business Development and Growth	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$6,696,203.00	Jobs created/retained	190	39	Jobs	20.53 %
				Businesses assisted	930	137	Businesses Assisted	14.73 %
Improve Condition of Public Facilities	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$4,592,446.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	178000	24403	Persons Assisted	13.71 %
Improve Parks and Recreational Areas	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$3,381,791.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	120980	24185	Persons Assisted	19.99 %
				Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	0	0	Households Assisted	0 %
Improve Quality of Occupied Housing Units	Affordable Housing	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$3,018,000.00					

				Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	1950	0	Households Assisted	0.00 %
				Rental units rehabilitated	10	0	Household Housing Unit	0.00 %
				Homeowner Housing Rehabilitated	100	18	Household Housing Unit	18.00 %
Improve Streetscapes & Public Infrastructure	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$1,157,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	129955	0	Persons Assisted	0.00 %
Increase Availability of Affordable Housing	Affordable Housing	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		HOME	\$6,813,823.00	Rental units constructed	20	0	Household Housing Unit	0.00 %
				Rental units rehabilitated	16	0	Household Housing Unit	0.00 %
				Homeowner Housing Added	15	2	Household Housing Unit	13.33 %
				Homeowner Housing Rehabilitated	0	0	Household Housing Unit	0 %
				Direct Financial Assistance to Homebuyers	100	3	Households Assisted	3.00 %
Increase Housing Stability among PLWHA	Non-Homeless Special Needs	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		HOPWA	\$5,653,194.00	Public service activities other than Low/Moderate Income Housing Benefit	0	0	Persons Assisted	0 %
				Tenant-based rental assistance / Rapid Rehousing	110	60	Households Assisted	54.55 %

				HIV/AIDS Housing Operations	245	98	Household Housing Unit	40.00 %
				Other	900	627	Other	69.67 %
Provide for Basic Needs of LMI Persons	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$4,769,000.00	Public service activities other than Low/Moderate Income Housing Benefit	122464	61597	Persons Assisted	50.30 %
				Public service activities for Low/Moderate Income Housing Benefit	150	27	Households Assisted	18.00 %
				Homeless Person Overnight Shelter	0	0	Persons Assisted	0 %
Reduce Homelessness	Homeless	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		ESG	\$2,036,668.00	Public service activities other than Low/Moderate Income Housing Benefit	3100	1521	Persons Assisted	49.06 %
				Tenant-based rental assistance / Rapid Rehousing	170	85	Households Assisted	50.00 %
				Homelessness Prevention	250	0	Persons Assisted	0.00 %
Return Abandoned Property to Productive Reuse	Affordable Housing	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$1,500,000.00	Homeowner Housing Rehabilitated	10	0	Household Housing Unit	0.00 %
				Buildings Demolished	5	0	Buildings	0.00 %

Revitalize Commercial Districts in LMI Areas	Non-Housing Community Development	Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
		CDBG	\$150,000.00	Facade treatment/business building rehabilitation	10	0	Business	0.00 %

Table 2 - Accomplishments –Strategic Plan to Date

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

Housing

The City identified the need to increase the availability of safe and affordable housing for City residents and households, including units with supportive services for extremely low-income and/or special needs populations, as high priority.

The identified lack of maintenance of the City's housing stock makes many housing units in need of repair and rehabilitation. The City used CDBG in PY21 to offer deferred payment, 0% interest loans to qualifying homeowners to rehabilitate occupied properties through its Home Repair Program. 13 loans reported accomplishments in PY21, with additional loans approved and work completing in the following program year.

In PY21, the City continued to partner with receivers and housing developers to address properties that had been long-blighted due to complicated title issues to conduct rehabilitation of vacant and abandoned homes for affordable homeownership or rental units in order to return abandoned property into productive use. These efforts are reinitiating after delays due to pandemic related court closures and work stoppages.

Homelessness

In collaboration with the Consolidated Homeless Fund and the state Continuum of Care, the City used federal funds to support the elimination of homelessness through street outreach and rapid re-housing assistance, serving 1,259 unduplicated clients throughout the course of the program year.

The City also used HOPWA funds to ensure that 87 low-income persons living with HIV/AIDS (PLWHA) obtained and maintained stable housing through support for costs for facility operations; rental assistance; short-term payments to prevent homelessness; paired with support services including assessment and case management and assistance with daily living.

Public Facilities

The physical condition of many of the structures which community organizations and social service agencies use are in significant disrepair. The City used CDBG funds to improve these facilities so that the City's low- and moderate-income population could continue to receive services. Finally, emergency repairs to public school buildings are underway or completed to create safer learning environments for school

children.

Streets, Sidewalks and Public Infrastructure

PY21 CDBG funds were used to improve the physical condition of the City's streets, roads, and sidewalks. Sidewalk construction initiated in the program year is ongoing, with an anticipated completion date of November 2022.

Improve Parks, Open Space, Community Gardens, and Sports Fields

The City supported the improvement of existing parks, open space, and sports fields.

Provide for Basic Needs of LMI Persons

Through ongoing support of the City's network of community centers and other service organizations, funds were used to provide for the basic needs of low-income residents including food assistance, clothing, case management services, provision of health and wellness services to low-income and uninsured residents, job training, youth enrichment and educational programs, recreation activities for youth, and day care services.

COVID-19 Response

PY21 was another unprecedented period, as the COVID-19 pandemic and associated State of Emergency has continued through 2022. The City, like many other entitlements, received additional CDBG, HOPWA, and ESG funding ("CV" funding) through the CARES Act. These funds were used to provide vaccination and testing services, essential social services to assist the medically-vulnerable, homebound, high risk, and unemployed, and to modify facilities (such as a food pantry and a health clinic) to ensure safe, socially-distant service. The City also utilized funds to address an unprecedented and dangerous rise in homelessness, and to provide small business lending to impacted industries. These CV activities are reflected in a supplemental report, attached.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME	ESG	HOPWA
Race:				
White	34977	4	684	46
Black or African American	15215	0	381	35
Asian	5349	0	8	0
American Indian or American Native	380	0	44	0
Native Hawaiian or Other Pacific Islander	103	0	6	0
Other/Declined to Report	To be reported	To be reported	To be reported	To be reported
Total:	56024*	4*	1123*	81*
Ethnicity:				
Hispanic	24357	4	246	6
Not Hispanic	31667	0	960	0

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

City of Providence CDBG, HOME, and ESG projects and activities funded in PY21 were targeted at every low- and moderate-income area of the City. HOPWA funding supported operations throughout the Providence - Fall River - New Bedford EMSA.

With limited exception, most neighborhoods throughout the City of Providence have areas with low- to moderate-income populations. As such, the actual beneficiaries served, as reported in the table above, reflect that resources were fairly dispersed throughout the City, targeting the most economically distressed areas of the City's neighborhoods and serving the City's diverse demographics.

The areas of concentration for persons of color in Providence are located in the Upper South Providence, Lower South Providence, West End and Olneyville neighborhoods. Providence has rich diversity in its population. Minority populations in the City of Providence are the majority, with the White, non-

Hispanic/Latino population only comprising 36.7% of the population. The data reported above reflects that the City's HUD-funded activities benefitted its diverse populations, neighborhoods, and racial and ethnic groups equitably; however, numbers of total beneficiaries are understated and do not reflect contracts or projects still underway, projects that report accomplishments at the broad "Census Block Group"-level, or beneficiaries that may have reported their race as "Other Multi-Racial" and/or declined to report (a significant percentage of total* served that must be manually calculated).

DRAFT

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available:

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$7,401,600	\$5,533,582
HOME	public - federal	\$1,895,246	\$269,155
HOPWA	public - federal	\$1,275,480	\$1,333,388
ESG	public - federal	\$533,692	\$455,335

Table 3 - Resources Made Available

The City of Providence fully obligates all federal HUD entitlement funds it receives through its Annual Action Plan process. These funds are expended on a reimbursement basis through contracts for funded activities. Funds expended, above, reflect payments made as of September 14th, 2022. As described previously, a number of contracts are underway, but not fully drawn. In instances where projects came in under budget, funds are recaptured and reprogrammed through the following year's Action Plan to ensure all dollars are utilized in a timely manner for critical community needs.

Identify the geographic distribution and location of investments:

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation
Community Wide - Entire City Geographic Area	85%	85%
Providence - Fall River - New Bedford EMSA	15%	15%

Table 4 – Identify the geographic distribution and location of investments

All CDBG, HOME, and ESG funds were deployed within the jurisdiction of the City of Providence, particularly within the City's lowest-income neighborhoods. HOPWA funds were provided to subrecipients located within the Providence-Fall River-New Bedford EMSA area to benefit clients regionally living with HIV/AIDs.

Leveraging

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

The City's PY21 HOME program required recipient organizations to contribute at least 25 percent of the value of the HOME award as a contribution match as a condition of the award in order to satisfy HUD regulations without financial impact to the City. Additionally, the City utilizes its HOME funds as gap subsidy, meaning HOME is typically the "last money in" to make a project go. As such, City HOME investments leveraged millions in Low Income Housing Tax Credits, construction lending, developer equity, Building Homes RI bond funds, and other capital sources.

In this 2nd ConPlan year, the City continued its partnership with the Consolidated Homeless Funds CHF Partnership, which oversaw a variety of homeless service funding grants including: City of Pawtucket ESG; City of Providence ESG; City of Woonsocket ESG; State of Rhode Island ESG; State of Rhode Island Housing Resource Commission Homeless Funds; and Social Service Block Grant Funds (from the Federal Department of Health and Human Services, passed through the Rhode Island Department of Human Services).

Due to this unique collaboration, the CHF Partnership continues to be able to provide 100% matching funds without transferring the match responsibility to ESG subrecipients. The CHF Partnership uses the rules, regulations, and policies in the ESG regulations and as adopted by the RI Continuum of Care as the basis of the program design for all CHF programs (even those that are not directly funded under ESG).

In PY21, the City continued the "Every Home Initiative", which sought to transition privately-owned vacant and abandoned property and lots, City-owned lots, Providence Redevelopment Authority-owned property, and tax reverted property back to productive use. A myriad of strategies were developed to facilitate program goals based on the particular circumstances of the property or lot, and the available stakeholder partners. The use of CDBG funds for eligible activities when appropriate (such as acquisition or demolition/clearance) was one of the tools used for this program; gap financing with CDBG continues to prove a successful tool to ensure substantial rehabilitation of properties while maintaining affordable resale prices.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$19,736,651
2. Match contributed during current Federal fiscal year	\$338,500
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$20,075,151
4. Match liability for current Federal fiscal year	\$194,744
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$19,880,407

Table 5 – Fiscal Year Summary - HOME Match Report

DRAFT

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

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	0	0	0	0

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	\$2,419,150	0	0	0	\$634,650	\$1,784,500
Number	4	0	0	0	2	2
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	3	0	0	1	2	0
Dollar Amount	\$198,750	0	0	\$66,250	\$132,500	0

Table 9 – Minority Owners of Rental Property

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

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	52	52
Number of Non-Homeless households to be provided affordable housing units	65	15
Number of Special-Needs households to be provided affordable housing units	78	87
Total	195	154

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	130	139
Number of households supported through The Production of New Units	38	0
Number of households supported through Rehab of Existing Units	27	13
Number of households supported through Acquisition of Existing Units	0	2
Total	195	154

Table 12 – Number of Households Supported

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

In the case of affordable housing construction or rehabilitation, outcomes do not often occur within the same program year.

The accomplishments, as reported in IDIS, often do not come until occupancy by low- and moderate-income households of constructed or rehabbed units occurs. More often than not, projects with layered funding sources and subsidies (such as LIHTC, CDBG, and HOME) can take multiple years to complete pre-development and construction, and ultimately achieve full occupancy.

Accomplishments in the tables above reflect current counts as of September 2022. These accomplishment numbers will continue to be updated as additional projects (38 units) achieve completion and occupancy.

Discuss how these outcomes will impact future annual action plans.

In response to HUD TA, the City made adjustments to its 2022 Action Plan to ensure "One-Year Goals" are forecasted more accurately. It's important to note that "One-Year Goals" forecasted in the AP-20 Action Plan table (then reported on in the CR-20 CAPER table) are units anticipated to achieve occupancy in the same program year (i.e. are therefore typically activities associated with prior Action Plans). Prior to the PY2022 Action Plan, the City had been reported the total number of units associated with projects to be assisted in the year (not just the units proposed to achieve occupancy within the 12 month period). This table will therefore be more accurate in the PY2022 and future CAPERs.

Activities that have drawn down funds but are not yet occupied have been updated with regular progress reports in the IDIS system, and accomplishments will be reported in future CAPERs (a detailed spreadsheet of accomplishments anticipated and expected timeframes for completion is attached to this CAPER). If projects fail to move forward or achieve occupancy within the contracted period, funds will be recaptured and reprogrammed through future annual Action Plans.

The City prioritizes the funding of "shovel-ready" affordable housing projects, and will continue to do so in future Action Plans and budget cycles in order to maximize its unit production.

The City also continues to prioritize its Home Repair Program and Down Payment Assistance Programs as tools to preserve or create affordable housing, as these programs are able to assist large volumes of low-income clients in either purchasing homes, or preserving the suitability and affordability of existing properties through rehab.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	6	0
Low-income	6	2
Moderate-income	1	0
Total	13	2

Table 13 – Number of Households Served

Occupied housing demographics (income levels) for rental and homeownership housing completed for PY21 as of September 2022 reflected above. "Extremely low income" is defined by HUD as households earning 0-30% area median income. "Low income" is defined as 31-50% area median income. "Moderate income" is defined at 51-80% area median income.

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

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs:

There are several agencies that conducted outreach efforts in the City of Providence in PY21. In collaboration with the Rhode Island Continuum of Care and the Consolidated Homeless Fund, the City used its Emergency Solutions Grants (ESG) to support outreach efforts and case management services to connect the unsheltered homeless population with emergency shelters, permanent housing, and the supportive services necessary to maintain their housing.

As part of broader efforts to eliminate chronic homelessness, the City supports agencies that engage hard-to-reach street homeless, individuals existing the criminal justice system or aging out of the foster care system, homeless veterans, and individuals with substance abuse or mental health issues.

In PY21, the City funded Amos House with CDBG for its "A Hand Up" program, which connects homeless panhandlers with day work and case management. The City funded Better Lives Rhode Island (fka Providence-In-Town-Churches Association) for street outreach and essential services with ESG funds. Better Lives is one of only a few agencies in Rhode Island that provides "drop-in" case management, offering clients the ability to walk-in to seek services ranging from initial assessment to intensive assistance with benefits (SSI/SSDI), medical coverage, rehousing, or SNAP. Similarly, Project Weber RENEW provided mobile and drop-in harm reduction services to the unhoused and high-risk with CDBG funding.

The City also partnered with House of Hope to operate the Shower to Empower Mobile Navigation Unit, a mobile trailer with medical exam space and showers offering showers, haircuts, toiletries and other sundries, case management, and medical services to people experiencing homelessness stationed throughout multiple Providence neighborhoods. This program has engaged hundreds of clients and provided over 5,000 showers since its rollout in 2017. Through this accessible street outreach program, street outreach staff are able to "meet clients where they are", assess and triage clients, and get clients entered into the Coordinated Entry system for connection with housing and shelter services. The agency continues to expand its partnerships with area medical schools, increasing services to also include foot clinics and COVID screenings --a critical health need for the unsheltered while they await safe, permanent housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Crossroads Family Shelter is the only emergency shelter for homeless families in the City of Providence. The Family Center was purposely designed to accommodate the multiple needs of families. First, the main floor of the center is handicapped accessible, ensuring that all persons, regardless of physical limitations, have equal access to decent, safe shelter. With fifteen bedrooms, up to

fifteen families can be housed at one time in the Center. The bedrooms vary in size and were uniquely designed as 'suite style' so that they can accommodate larger families without having to separate them. Case management, shelter activities and interactions with families are focused on housing solutions and solving the problems that contributed to their homelessness or present barriers to stable housing. Families with the most complex needs are assigned to housing first case managers who focus on placement in permanent supportive housing. Families with mid-range acuity are assigned to a rapid-rehousing case manager for supportive services including financial assistance to place in a market rate or subsidized apartment.

In 2021, the City provided ESG resources to fund rapid rehousing through Crossroads to assist homeless persons requiring placement into housing units. Additionally, HOPWA resources were provided to multiple HOPWA providers to support the housing needs of persons living with HIV/AIDs who are often facing homelessness or experiencing a housing crisis.

CDBG funds were also provided to Sojourner House for the purposes of case management and short-term rental assistance (up to 3 months of rental assistance) for victims fleeing domestic violence, enabling the agency to transition clients in crisis into safe, permanent housing.

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

In PY21, local providers such as Open Doors offered essential services to prevent or address homelessness in formerly incarcerated adults who are at risk of homelessness and to connect them with other programs such as subsidized transitional housing, addiction treatment programs, and mental health facilities after release or while paroled.

Homeless prevention initiatives are centered on short- and long-term initiatives. The long-term strategy, on the other hand, is to facilitate employment and increase support networks as a means to preventing homelessness or return to homelessness. By preventing homelessness and supporting homeless services and outreach efforts, the City aims to identify and target those individuals and families who would otherwise become homeless without timely assistance. Supportive services and housing assistance for the special needs population are particularly important because of their vulnerability to homelessness.

Through the case management services funded by the City's PY21 allocation of ESG funds, many of these prevention and rapid resolution services were supported. However, the State of Rhode Island's DCYF system does not provide the necessary array of services to youth who are about to exit the foster care system to live independently. Often times, these individuals fall into homelessness or are in precarious situations and are at imminent risk of homelessness. Similarly, for those exiting the criminal justice

system, many are at-risk of homelessness.

To address the potential homelessness of foster youth, Adoption Rhode Island, in partnership with Family Service of RI, Lucy's Hearth, and House of Hope Community Development Corporation developed the "Bridges to Hope Project", a collaboration to help disconnected youth who are at risk of aging out of the foster care system without permanency or who have aged out. This collaboration continues to formalize working relationships between these organizations to provide comprehensive and outcomes-oriented services for youth who are or have been involved in the child welfare system who are facing barriers to stability as young adults.

Additionally, the Continuum of Care applied for, and was successfully awarded, a \$3.5M HUD Youth Homelessness Demonstration Program grant in FFY21 for system planning and targeted programming to address this underserved segment of the population. As part of participating in YHDP, Rhode Island was required to develop a Coordinated Community Plan to Prevent and End Youth Homelessness (CCP); the CCP will guide the implementation of new projects and a newly coordinated system of care with the overall goal of ending youth homelessness. Rhode Island submitted its CCP to HUD in March 2022, and released a call for projects in April, with awards to be made to subgrantees in fall 2022.

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

Rapid rehousing assistance was provided to homeless households throughout the City, as well as essential services to homeless individuals and families, particularly those who are chronically homeless, persons in recovery and/or suffering from addictions, the formerly incarcerated, and/or persons with physical and mental illnesses. Locating and maintaining stable housing continues to be the emphasis.

All HUD-funded programs include financial eligibility criteria and are targeted to low-income households. Local providers such as Crossroads Rhode Island, House of Hope, and Better Lives RI offer essential services to prevent homelessness and/or enable rapid resolution to homelessness.

Homeless prevention initiatives are centered on short and long term initiatives. The long term strategy, on the other hand, is to facilitate employment, provide appropriate levels of ongoing housing stabilization and case management (as needed), and increase support networks as a means to preventing homelessness or return to homelessness. By preventing homelessness and supporting homeless services and outreach efforts, the City aims to identify and target those individuals and families who would otherwise become homeless or remain unhoused without timely assistance. Supportive services and housing assistance for the special needs population are particularly important because of their vulnerability to homelessness.

Of course, a major barrier to permanently housing the homeless in Providence is a lack of available, affordable rental units. As such, the City continues to make investments with HOME, CDBG, and HOPWA funds to develop and preserve units. In PY21, the City developed a number of new housing units with CDBG and HOME funds with the goal of deep and long-term affordability. A particular focus of the City continues to be the redevelopment of the City's large number of blighted, abandoned properties to bring much-needed homeownership and rental units to the market.

Thanks to strategic investment strategies across funders (City, Providence Housing, and RI Housing) many new units rehabbed or constructed often leverage other forms of subsidy (such as project-based vouchers via the Providence Housing Authority or Continuum of Care programs) to enable deep affordability and supportive services.

DRAFT

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

Actions taken to address the needs of public housing:

The City of Providence supports the ongoing operation of the Thomas J. Anton Community Center at Hartford Park. Through the City's annual support of public service activities, the Department of Resident Services is able to provide adult education classes, family self-sufficiency program, financial opportunity center and financial coaching programs, income support, and employment counseling.

There are many restoration and revitalization needs in the portfolio of public housing throughout the City. While the PHA is expending more than \$6.82M through its FFY21 Capital Fund, needs far outweigh available resources, and capital funds are largely dedicated to repairs or replacements. As such, the PHA often seeks out CDBG resources for projects that will boost safety and amenities for its residents and did so in PY21.

The City addressed the extensive needs discussed above by extending its commitment to fund service operations at the Thomas J. Anton Community Center at Hartford Park in the program year, as well as providing CDBG to address needed facility and safety upgrades for various PHA complexes. Improvements include egress and doorway reconstruction and replacement, and sustainability and safety improvements.

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

The Providence Housing Authority continues to cultivate Resident Advisory Board and Resident Association relations and communication to maintain transparency, and to provide a forum for valuable resident participation in planning activities guided by PHA goals and objectives. The PHA has a Resident Association (RA) and Resident Planning Committee (RPC) at every development. The president of each Resident Association, as well as a representative from each Planning Committee, serves as a delegate to a larger "Resident Advisory Board", which meets monthly to provide feedback and guide PHA policies and policy-making.

Aside from the provision of safe and affordable housing, the PHA's core mission also includes provision of services to address economic and social service needs of PHA residents.

The PHA's Resident Services Department (RSD) furthers the agency's mission to address the self-sufficiency needs of residents by providing a comprehensive continuum of programs including:

- Resident Service Coordinator (RSC) Program (coordination of general social services; case management including limited counseling and crisis intervention)
- Adult Education Program (ESL; ABE/GED; Digital Literacy)
- Family Self Sufficiency (FSS) Program (supports for financial independence through employment/increased earned income; an escrow savings plan is available as an incentive)

- Financial Opportunity Center (FOC) Program (financial coaching; income (benefits) supports; work readiness training; job search/placement; employment supports)
- Jobs Plus Providence (JPP) Program (workforce development through job training and employment supports; an Earned Income Disregard (EID) is available as an incentive)
- Volunteer Income Tax Assistance (VITA) Program (free tax preparation for eligible individuals/families);
- After-School Youth Program (on-site activities for youth age 6-12 provided through a formal partnership with the Providence Boys and Girls Club) that supports working parents.

The Providence Housing Authority is also a HUD-certified Housing Counseling Center, and provides qualified guidance to clients exploring homeownership, as well as pre- and post-purchase counseling. The Housing Authority also launched multiple programs to respond to the needs of residents during the pandemic, including community health programming, vaccine clinics, and food pantry services.

Actions taken to provide assistance to troubled PHAs:

Not applicable, Providence Housing Authority was not designated as a troubled PHA in PY21 or in any recent history.

The PHA recently completed its Strategic and five year plan(s), and updated its capital improvement plan. The City continues to engage the PHA to discuss funding priorities and the urgent rehabilitation needs of its facilities to ensure safe and habitable public housing in the City.

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

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

- 1) The City continued its partnership with the Housing Network of Rhode Island to provide a bilingual down-payment and closing cost assistance program to alleviate the significant upfront cost burden creating a barrier for low-income homebuyers when purchasing a new home.
- 2) The City developed a Language Access Plan and Toolkit and implemented by conducting translation of documents, creating language banks for City communications, and expanding its on-call translation services to ensure equal access to City services.
- 3) The City partnered with RI Center for Justice, DARE and RI Legal Services to assist with support for low-income renters that have been unfairly treated in the access or retention of housing in the City. The City passed local legislation in 2020 to expand protected classes in the City (to prevent discrimination on the basis of source of income) and continues to fund expanded legal representation for low-income tenants in the City's Housing Court system. This legal aid works in parallel to the City's enhanced code enforcement efforts aimed at ensuring the safety and welfare of City residents with limited housing choice.
- 4) The City continued its Home Repair Program in 2021. This CDBG program provides deferred payment, 0% interest loans to owner-occupants who are unable to finance critical repairs to their homes. Rising construction costs continue to exacerbate deferral of maintenance and substandard housing for households with fixed or stagnant incomes. This program enabled households to afford critical repairs who would otherwise be unable to do so (due to inability to obtain conventional home equity lending due to their limited or fixed incomes).
- 5) The City has provided incentives to developers to create affordable housing at the City level through policy and zoning changes. These incentives include:
 - Enabling legislation to permit the Providence Redevelopment Agency to acquire properties certified to be vacant, abandoned, and tax delinquent. This initiative allows the City to convey clear title to potential developers at lower cost (than if developers purchased at auction), and bring hundreds of abandoned properties back into productive reuse as market and affordable housing. The RFP process by which the PRA disposes of these properties includes criteria that favor affordable housing proposals, as well as proposals that will utilize MBE & WBEs.
 - The City Zoning Ordinance has "T.O.D. Districts", or transit-oriented development districts that allow for housing construction in proximity to public transit, and to allow for increases in residential density.
 - Commercial historic districts were expanded to properties, increasing the number of properties

potentially eligible for historic tax incentives for preservation and redevelopment as housing.

- Height bonuses were also included to allow waivers on height limits for developments offering affordable housing.
- Codified a long-term funding stream in 2020 (earmarked a percentage of Tax Stabilization Agreement revenue to the Providence Affordable Housing Trust) to be administered by the Providence Redevelopment Agency. This estimated \$1M+ per year stream enabled the City to bond for \$24M, creating a Housing Trust Fund for low-interest development loans and subsidy for the creation and preservation of affordable housing.

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

The City conducted a public services audit in collaboration with Roger Williams University to evaluate the City's ecosystem of public service providers, with the intention of identifying programming overlaps, inefficiencies, and gaps in service to better coordinate and target funding to address unmet need and minimize duplication. The City also partnered with the Brown University Public Policy Program, which held fall 2017 and 2018 courses for Brown students, as well as adult learners from the public sector and community service organizations (CSOs) entitled "The Science and Craft of Applied Policy Research: Governing Community Service Providers in Providence", which explored the following questions surrounding social service needs in Providence:

- Which operational and financial skills are the most difficult for CSOs to acquire and maintain?
- What kind of resources would be needed to facilitate increased sustainability, and where might these resources be located?
- Can CSOs improve their managerial capacities and the quality of the services they provide by learning from each other and/or by accessing capacity-building resources that might be found elsewhere in Providence's broader philanthropic and non-profit community?
- What would have to be done to reduce the costs of continual learning within service providers and across the broader ecosystem?
- Can the objectives of individual CSOs and the division of labor between them be reconfigured in ways that produce greater public value at similar levels of cost?
- Are changes to the City's RFP process for CDBG social services warranted, and/or can changes be made to better prioritize proposals addressing underserved social service needs?

The findings of this ecosystem analysis and Brown course informed the City's provision and design of technical assistance to agencies in 2021.

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

The City of Providence, through its Division of Housing & Community Development (DCD), has developed a comprehensive and cohesive Lead Safe Providence Program (LSPP) to coordinate lead hazard reduction with existing housing programs to integrate HUD-funded lead poisoning prevention and "Healthy Homes" interventions. The DCD has experience in successfully operating its current 42-month HUD Lead Hazard

Reduction Demonstration grant, as well as 8 total prior HUD Lead Hazard Control Grants. Under its current grant, the City is making 275 units lead safe, healthy, and energy efficient, and will provide free comprehensive lead inspections for approximately 300 units. The \$5.7 million grant-funded LSPP also leveraged funds from its public, private, and community-based partners.

Using the experience gained from successfully managing its previous and existing HUD Lead Grant Programs, the Lead Safe Providence Program utilizes a dynamic program to:

- Perform lead hazard reduction (interim controls) interventions;
- Provide free lead inspections/risk assessments for owners to identify lead hazards;
- Complete Healthy Homes interventions in Program units;
- Complete leverage-funded Weatherization interventions in Program units;
- Conduct over outreach and education events that support the goal of reaching thousands of residents, health care providers, community organizations, FBOs, property owners, realtors and contractors;
- Provide job training and increased contractor capacity by providing Free Lead Worker trainings and certifications as well as Green & Healthy Homes jobs training;
- Operate a LSPP HEPA-Vacuum Loan Program;
- Support an existing Lead Safe Housing Registry of available healthy/lead certified rental properties to distribute regularly to community residents who are seeking safer housing;
- Utilize the HUD Healthy Homes Rating System (HHRS) and tablet computer for efficient field assessments and Scope of Work development for Healthy Homes interventions;
- Expand the integrated Green & Healthy Housing Initiative Providence model to produce comprehensive interventions and create more sustainable units.

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

The following are the activities undertaken during PY21 to lift people out of poverty:

- *Adult Basic Education, Literacy, and GED Training:* Working with the Providence Community Library, the City engaged low-literacy adults and newly arriving immigrants in English language programs to ensure they have the language skills to be full participants in the local and regional economy.
- *Job Training and Skill Development:* Working with Amos House & Building Futures, and in coordination with the public workforce system, the City bolstered workforce development efforts to build job skills among low-income Providence residents.
- *Youth Training and Summer Youth Employment:* the City of Providence, in collaboration with the Governor's Workforce Board and the RI Department of Human Services, offers summer employment to help teenagers and young adults develop job skills, learn positive work habits, and stay engaged in the community. The City also provided funding for Southside Community Land Trust to provide youth employment opportunities in urban agriculture.

- *Youth Educational Attainment:* the City provided funding for afterschool, summer, and before-school supports to assist youth to meet educational goals and pursue pathways to living wage adult employment through hands-on arts, STEM, and construction skills training, and college prep (College Visions, Providence Promise).
- *Increase Access to Work Supports:* the City promotes residents signing up for work support programs and fosters job readiness and soft skill development through partnerships with community centers and public service organizations. Increased work supports help low-wage families meet their basic needs and move toward financial security.
- *Support for New and Existing Businesses:* Working with the Center for Women & Enterprise, Genesis Center, and RI Black Business Association (RIBBA), the City provided funds for technical assistance to get low-income, Spanish-speaking, and minority businesses and entrepreneurs "credit ready" and primed for growth. The City also continues to support Providence businesses through low-interest Providence Business Loan Fund (PBLF) loans, which provided flexible lending with the goals of fostering local business growth and increased job creation/retention for low/mod employees. The City also supported new businesses and entrepreneurs through the provision of small grants for design businesses through the DesignxRI program.
- *Expand Procurement and Growth Opportunities for Businesses Owned by Persons of Color and Women:* In order to support to the fullest extent possible participation of firms owned and controlled by minorities or women, the City has a mandate that all requests for procurement shall be inclusive of M/WBEs, and that the City shall strive to achieve at least 10% procurement from MBEs and 10% procurement from WBEs. By increasing the availability of City contracts to these businesses, greater revenues will flow to local businesses owners, facilitating greater local economic growth and more local employment. Additionally, the City funded the Center for Women and Enterprise and RIBBA, who offered programs providing technical assistance to minority and women-owned businesses and entrepreneurs.

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

Providence is rich in the number and type of agencies and organizations that provide social services to populations in need. This network of agencies and organizations provides a broad variety of housing, economic, and social service programs that serve many community residents. These include community development corporations (CDCs), other non-profit housing developers, non-profit service providers, human services and shelter providers, organizations working with special needs populations, and other community-based organizations. Most of these organizations are funded through a combination of public and private sources.

While there is no shortage of community organizations in the City, the unfortunate reality is that many of these service agencies struggle with resource constraints, compete for the same limited funding opportunities, and often offer duplicative services. There is a general lack of communication among the various groups in the City which impedes the efficient delivery of services in a coordinated fashion. Providers in the City need to consider more pro-active collaboration or consolidation to eliminate the duplication of services and to align resources and effort to have greater impact in the communities they

serve. In an effort to facilitate collaboration, the Division of Housing & Community Development advises potential applicants to coordinate efforts and avoid redundancies.

Additionally, with a greater emphasis on requiring full compliance with all local, state, and federal rules, and an increased demand for grant recipients to demonstrate outcomes, as opposed to strictly outputs, the City ensures funds invested in programs will not only have an impact, but that these efforts will also raise the capacity and effectiveness of organizations that adapt to these new demands.

Through ongoing dialogue with subrecipients, proactive outreach of other community organizations, technical assistance and capacity building workshops, and through regular focus groups and interviews, the City assists in expanding and enhancing the existing institutional delivery system. The City continues to focus on measuring outcomes and analyzing the return on its investment of Federal dollars, and investing in programs that provide high impact.

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

The City hosts and participates in regular working groups and discussions with agencies, organizations, and providers to better coordinate programming and align resources to create a holistic and targeted offering of services that account for the myriad needs found in particular neighborhoods. By working in partnership with locally-based providers and community development organizations, the City actively promotes the coordination of services. With the fluctuation in resources from the Federal government, the City needs to highlight efficiency and maximum value creation to deliver long-term impact in a strategic way.

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

The City is required to examine barriers to fair housing choice and develop a plan to mitigate such barriers. This information is detailed within the Analysis of Impediments to Fair Housing, which was completed as a regional analysis in partnership with the State of Rhode Island, RI Housing, and the Rhode Island entitlement cities: https://www.rihousing.com/wp-content/uploads/RI-AI-Final_06.29.20-3.pdf.

In 2020, the City passed local legislation to add "Source of Income" as a protected class, and launched an eviction defense/legal aid pilot in partnership with RI Center for Justice, DARE, and RI Legal Services to foster fair housing and prevent displacement which will be continued with American Rescue Plan Funds. The City also continued investments to address home repair and health and safety issues in older homes occupied by lower income households (including the elderly and those with disabilities) to foster safe, affordable housing. All of these initiatives were identified within the AI.

CR-40 - Monitoring 91.220 and 91.230

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

Monitoring of activities and projects funded during the program year is conducted on a frequent, routine basis.

Monitoring of public service activities and community centers includes meeting with the subrecipients, reviewing project files (including staff timesheets, beneficiary information, and expenditures) and observing the services or activities whenever possible. The City also reviews social service agencies' annual audits for any potential findings or concerns related to administration, recordkeeping, or financial management. Formal subrecipient monitoring occurs no less than annually. During the pandemic, some monitoring functions were shifted to remote (desk monitoring) to enable safety of staff.

Monitoring of public facility, infrastructure, and other construction or rehabilitation projects includes site visits, routinely taking photographs of work-in-place and construction progress, and Davis Bacon employee interviews (if applicable). Projects conducted by subrecipients also include audits of clients served and financial reviews.

Monitoring of economic development activities (such as loans issued by the PBLF) includes site visits, as well as compilation of income certifications and other reports to document hiring of low/moderate income workers and achievement of sufficient public benefit (i.e. job creation/retention) to support the lending to private enterprises.

All subrecipients are informed of the program requirements associated with the CDBG, HOME, ESG, and HOPWA programs prior to, and during, the execution of their contract or subrecipient agreement. All relevant program requirements are included in these contracts with grantees, including (but not limited to) Section 3, Non-Segregated Facilities, Davis Bacon wage requirements, Drug and Alcohol Free Workplace, and more. The City makes amendments as needed to its contracts and Program Manuals to foster compliance with, and awareness of, 2 CFR 200 and other regulations, and conducts periodic Fiscal and Reporting Workshop for its subrecipients to boost subrecipient knowledge of federal requirements.

Additionally, the City has its own requirements for any subrecipients who will be creating jobs or hiring contractors as a result of their grant award. Providence requires any hiring to include a preference for "FirstSource" list employees (who are mainly-unemployed or underemployed Providence residents seeking work). When bidding home repair, deleading, or construction jobs, the City also requires that bids be obtained from a minimum number of minority or women-owned businesses (MBE/WBE). Both the City and State of Rhode Island maintain a current list of bonafide MBE/WBE businesses. Subrecipients must document outreach to MBE/WBE businesses, and are monitored for compliance with minority

participation goals.

The City's Housing & Community Development Division is housed within the City's Planning and Development Department. As such, it is an active participant in the development of the City's Comprehensive Plan, and has a responsibility to ensure all activities funded comply with the Comp. Plan.

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

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

Under its Citizen Participation Plan, the City identifies methods to ensure citizens have reasonable notice and opportunity to comment on annual performance reports. The City provides legal notice through the Providence Journal, published in both English and Spanish, notifying the public of the right to comment, the dates of the comment period, where to view the document, and appropriate contact information. The City also posts the CAPER and associated notice to its website and at its office at 444 Westminster Street.

<http://www.providenceri.gov/planning/community-development/>

Public comments to be reported here.

CR-45 - CDBG 91.520(c)

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

The City's CDBG Program objectives were identified through an extensive public process and market and needs analyses conducted through the most recent Consolidated Plan process. This Action Plan is Year 2 of the 5-Year 2020-2024 Plan. As such, the objectives of the program remained consistent throughout PY21.

However, while the goals of the Program remained constant, program policies were changed in response to experiences.

As a result of its recent experiences, market needs, and HUD monitoring, the City has placed new emphasis on funding housing activities with CDBG that are "shovel ready" and can create or preserve housing in a timely and cost-effective manner. Increased scrutiny and improved underwriting procedures are now in place to ensure all project financing is committed, subsidy is minimized, and the project is viable and shovel ready. This will enable the City to avoid projects becoming stalled or failing to achieve a HUD National Objective and ensure critically-needed housing is developed timely.

The City continues to work with HUD to improve its programs, services, and compliance. In PY21, the City made improvements to its written program policies and procedures, contracts, and monitoring procedures to better comply with existing or new federal requirements.

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

Not applicable.

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

Not applicable.

CR-50 - HOME 91.520(d)

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

The City of Providence has managed a successful HOME Housing Program to benefit low-income renters and homeowners for decades. The City's Division of Housing & Community Development maintains records of all projects and associated expenditures made to support the goal of fostering and maintaining affordable housing. Prior to occupancy or re-occupancy, all HOME projects are inspected by City Inspectional Services and Fire Department staff before occupancy permits were granted or units rented to ensure fire and code safety.

However, to address HUD's directives regarding inspections and on-site monitoring, the City of Providence adopted formal, written Program Policies, and developed a database to better track all HOME-assisted units during their affordability periods. This database includes information on the property address, level of HOME investment, number of HOME-assisted units, funding contract date, and affordability period information (such as book and page of recorded Affordability Restriction and required duration). This database assists the City in tracking the need for annual inspections and recertification of tenant income to ensure units remain habitable and affordable. Given the size of the City's portfolio, this database is not provided within this CAPER, but has been provided to HUD separately.

The City continues to work to address a sizeable backlog of inspections caused by a long-term lapse in monitoring. The City added an additional Lead and Healthy Housing Inspector in 2016 to increase staff capacity for inspections. This increased staff capacity temporarily enabled the City to conduct UPCS inspections on a number of HOME-assisted rental units identified in its database on an annual basis throughout their applicable affordability periods and make progress towards addressing this backlog of inspections. Owners of units that fail health and safety inspections would have been issued a notice to correct any deficiencies in a timely manner. The appropriate level of enforcement would then commence to ensure code and safety compliance and ongoing maintenance of federally-assisted units.

Unfortunately, the City has had difficulty in retaining an in-house inspector to serve this function. Despite the vacancy, a number of units were inspected in PY18, PY19, & PY20, nearly all of which passed UPCS inspection without any required repairs. Units requiring repairs were provided instructions on required corrective actions, which were completed. The pandemic necessitated a pause in on-site inspections to ensure safety of occupants and staff, but the City anticipates resumption of inspections in PY22. The City also filled the staff position in late PY21 on a probationary basis. Desk monitoring for unit occupancy and income eligibility compliance is ongoing.

Recognizing the need to correct this backlog and associated compliance deficiency, the City has identified funding to solicit and retain a qualified outside vendor for compliance monitoring inspections and services for the City. At the time of this CAPER publication, that draft RFP has been shared with HUD for review/feedback before release through the City's Board of Contract & Supply.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.

92.351(b)

The City requires all developers of HOME-assisted units (and private landlords with HOME-assisted rental units) to rent or sell them under an appropriate "Affirmative Marketing Plan". This requirement is stipulated in all HOME funding agreements with recipients, and has been incorporated into the City's "Underwriting Checklist" that must be completed as part of the project review and underwriting process. Prior to lease-up or occupancy, the City again evaluates the developers' plans to rent the units, confirms prices conform to the most current HOME rent limit and income guidelines, that appropriate utility allowances are employed, and that any "preference" in tenancing is allowable under the law and aligned with policy goals of furthering fair housing.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics:

Not applicable; the City did not receipt program income into its local account during the program year.

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

The City continues its efforts to rehabilitate, preserve, and create new affordable housing in the City, with an emphasis on identifying new areas of the City that would allow for mixed-use and mixed-income developments in higher income neighborhoods and Census tracts. Additionally, the City structured a number of HOME projects to include both affordable and market rate units to enable low-income homeowners to receive sustainable income from a rental unit, and allow for mixed-income developments in the City's higher- and lower-income neighborhoods.

Finally, the City continued to partner with RI Housing and other funders to leverage resources wherever possible to maximize the creation of affordable housing. In PY21, the City partnered with RI Housing and other area lenders to braid investment of Low Income Housing Tax Credits, bank construction lending, RI Housing HOME, State BHRI funds, and City HOME on multiple projects that are now underway.

CR-55 - HOPWA 91.520(e)

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

Number of Households Served Through:	One-year Goal	Actual
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0	0
Tenant-based rental assistance	25	32
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	53	55
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0	0
	78	87

Table 14 – HOPWA Number of Households Served

In PY21, the City used its HOPWA funds for the following: short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family, tenant-based rental assistance, and operating costs for permanent housing developments for people with HIV/AIDS.

The goal of the program is to provide housing assistance and supportive services for income-eligible individuals living HIV/AIDS and their families to establish and maintain a stable living environment in housing that is decent, safe, reduce the risk of homelessness, and improve access to health care and supportive services.

The City continues to encourage service providers to prioritize housing stability for HOPWA eligible clients and to make every effort to increase the number of clients receiving services and to ensure individuals and families do not fall into homelessness. Despite a challenging rental market, HOPWA subrecipients were successful at exceeding annual goals for units leased/operated and clients receiving tenant-based rental assistance through diligent efforts to foster partnerships with landlords and quality client-centric supportive service provision to ensure successfully tenancy.

CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	16	0	0	0	0
Total Labor Hours	380		0	0	
Total Section 3 Worker Hours	380		0	0	
Total Targeted Section 3 Worker Hours	380			0	

Table 15 – Total Labor Hours

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

Table 16 – Qualitative Efforts - Number of Activities by Program

Narrative

No HOME, HOPWA, or ESG construction projects were funded during the program year that would require Section 3 reporting of Labor Hours under the new rule. CDBG labor hours for projects covered by the rule (which are ongoing) are being actively tracked and reported in HUD's Integrated Disbursement & Information System (IDIS).

DRAFT

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	PROVIDENCE
Organizational DUNS Number	069853752
UEI	
EIN/TIN Number	056000329
Identify the Field Office	BOSTON
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

ESG Contact Name

Prefix	Ms
First Name	Emily
Middle Name	A
Last Name	Freedman
Suffix	
Title	Director of Community Development

ESG Contact Address

Street Address 1	444 Westminster Street
Street Address 2	Suite 3A
City	Providence
State	RI
ZIP Code	02903-
Phone Number	4016808435
Extension	
Fax Number	
Email Address	efreedman@providenceri.gov

ESG Secondary Contact

Prefix	Ms
First Name	Xiomara
Last Name	Gonsalves
Suffix	
Title	Senior Compliance Officer
Phone Number	4016808404
Extension	

Email Address

XGONSALVES@PROVIDENCERI.GOV

2. Reporting Period—All Recipients Complete

Program Year Start Date 07/01/2021

Program Year End Date 06/30/2022

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: Crossroads RI

City: Providence

State: RI

Zip Code: 02903,

DUNS Number: 099417792

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 206591

Subrecipient or Contractor Name: PICA

City: Providence

State: RI

Zip Code: 02903, 3615

DUNS Number: 794932004

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 60292

Subrecipient or Contractor Name: House of Hope Community Development Corporation

City: Warwick

State: RI

Zip Code: 02886, 7175

DUNS Number: 878385459

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 233000

CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities (Not Applicable)

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 16 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	49
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	49

Table 17 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter (Not Applicable)

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 18 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	1,179
Children	35
Don't Know/Refused/Other	2
Missing Information	0
Total	1,216

Table 19 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	1,222
Children	35
Don't Know/Refused/Other	0
Missing Information	2
Total	1,259

Table 20 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	745
Female	500
Transgender	5
Don't Know/Refused/Other	9
Missing Information	0
Total	1,259

Table 21 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	35
18-24	112
25 and over	1,110
Don't Know/Refused/Other	1
Missing Information	1
Total	1,259

Table 22 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households				
Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	48	0	1	47
Victims of Domestic Violence	249	0	17	233
Elderly	79	0	3	76
HIV/AIDS	16	0	1	1
Chronically Homeless	283	0	33	254
Persons with Disabilities:				
Severely Mentally Ill	562	0	28	538
Chronic Substance Abuse	302	0	7	296
Other Disability	626	0	47	589
Total (Unduplicated if possible)	1,490	0	82	1,423

Table 23 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

Not Applicable

DRAFT