

2015-2019 RHODE ISLAND CONSOLIDATED PLAN
GRANTEE UNIQUE APPENDIX

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SP-45 Goals – Manually Created Tables

TABLE 76 – ANTICIPATED RESOURCES BY GOAL

Goal	Funding	Start Year	End Year	Source Type	\$ 5-year Total
Goal 1 Develop and preserve affordable housing opportunities	HOME	2015	2019	Federal	\$15,010,835
	9% LIHTC - TC allocation only			Federal	\$13,900,000
	CDBG - 25% of awards (total housing set asides)			Federal	\$6,144,399
	Building Homes Rhode Island			State	\$5,800,000
	Housing Trust Fund - HERA 2008			Federal	\$9,000,000
	4% LIHTC - TC allocation only			Federal	\$6,000,000
	CDBG-DR Housing			Federal	\$4,600,000
	GOAL TOTAL			TOTAL	\$60,455,234
Goal 2 Prevent and end homelessness among chronically homeless, homeless veterans and homeless families while significantly reducing overall homelessness	State Rental Assistance Program - HRC	2015	2019	State	\$3,750,000
	Road Home			RI Housing	\$11,625,000
	Neighborhood Opportunities Program*			RI Housing	\$6,500,000
	Thresholds Program			State	\$5,000,000
	Continuum of Care			Federal	\$26,310,985
	HOPWA (Competitive grant)			Federal	\$3,427,475
	Entitlement ESG			Federal	\$3,591,180
	State ESG			Federal	\$3,343,495
	Title XX Homelessness Block Grant			Federal	\$6,361,925
	HRC Homelessness Funds			State	\$8,312,500
	State CDBG Funds Homeless Set-aside			Federal	\$2,500,000
	HUD 811 Project Rental Assistance			Federal	\$3,177,125
	GOAL TOTAL			TOTAL	\$83,899,685
Goal 3 Improve the accessibility, health, safety, and energy efficiency of all Rhode Island homes	State Lead Program	2015	2019	State	\$2,200,000
	HUD Lead Hazard Reduction Program and Healthy Homes			Federal	\$4,166,667
	CDBG Home Repair Program			Federal	\$4,915,519
	GOAL TOTAL			TOTAL	\$11,282,186
Goal 4 Provide Tenant-Based Rental Assistance to meet housing needs of lowest income households	Housing Choice Voucher Program	2015	2019	Federal	\$70,628,325
	GOAL TOTAL			TOTAL	\$70,628,325
Goal 5 Address Negative Impacts of Foreclosure Crisis	NFMC NeighborWorks Grant	2015	2019	Federal	\$841,535
	GOAL TOTAL			TOTAL	\$841,535
Goal 6 Promote economic development by addressing non-housing community development needs	CDBG - Balance of funds	2015	2019	Federal	\$11,017,677
	CDBG - DR Balance of funds			Federal	\$20,900,000
	GOAL TOTAL			TOTAL	\$31,917,677
Goal 7 Affirmatively Further Fair Housing	GOAL TOTAL	2015	2019		\$0
ALL FUNDS - CALIBRATION LEVEL				TOTAL	\$259,024,642

TABLE 80 – GOAL 1: DEVELOP AND PRESERVE AFFORDABLE HOUSING – ANTICIPATED RESOURCES AND OUTCOMES

<u>Resources</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 1 - Develop and Preserve Affordable Housing						
HOME Investment Partnership Program	\$3,002,167	\$3,002,167	\$3,002,167	\$3,002,167	\$3,002,167	\$15,010,835
9% Housing Tax Credit - allocation	\$2,680,000	\$2,730,000	\$2,780,000	\$2,830,000	\$2,880,000	\$13,900,000
Community Development Block Grant - setaside	\$1,228,880	\$1,228,880	\$1,228,880	\$1,228,880	\$1,228,880	\$6,144,399
Building Homes Rhode Island	\$5,800,000	\$0	\$0	\$0	\$0	\$5,800,000
Housing Trust Fund - HERA 2008	\$0	\$0	\$3,000,000	\$3,000,000	\$3,000,000	\$9,000,000
4% Housing Tax Credit - allocation	\$1,200,000	\$1,200,000	\$1,200,000	\$1,200,000	\$1,200,000	\$6,000,000
CDBG-DR Housing	\$893,890	\$926,527	\$926,527	\$926,528	\$926,528	\$4,600,000
TOTAL RESOURCES	\$14,804,937	\$9,087,574	\$12,137,574	\$12,187,575	\$12,237,575	\$60,455,234
<u>Outcomes</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 1 - Develop and Preserve Affordable Housing						
Rental units constructed	76	62	42	42	42	264
Rental units rehabilitated	540	506	463	463	463	2,435
Homeowner Housing Added	13	8	7	7	7	42
Homeowner Housing Rehabilitated	6	4	3	3	3	19
Housing for Homeless added	28	24	21	21	21	115
Rental units constructed - DR	0	0	24	0	0	24
Rental units rehabilitated - DR	60	60	60	60	60	300
TOTAL LOW MOD	635	580	515	515	515	2,760

Grantee Unique Appendix – 2015-2019 Rhode Island Consolidated Plan

TABLE 81 – GOAL 2: PREVENT AND END HOMELESSNESS – ANTICIPATED RESOURCES AND OUTCOMES

<u>Resources</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 2 - Prevent and End Homelessness						
Emergency Solutions Grants Program - Entitlements	\$718,236	\$718,236	\$718,236	\$718,236	\$718,236	\$3,591,180
Emergency Solutions Grants Program - Statewide	\$668,699	\$668,699	\$668,699	\$668,699	\$668,699	\$3,343,495
Social Service Block Grant, Title XX	\$1,272,385	\$1,272,385	\$1,272,385	\$1,272,385	\$1,272,385	\$6,361,925
RI Homelessness Funding	\$1,662,500	\$1,662,500	\$1,662,500	\$1,662,500	\$1,662,500	\$8,312,500
CDBG Homeless Setaside	\$500,000	\$500,000	\$500,000	\$500,000	\$500,000	\$2,500,000
State Rental Assistance - PSH	\$750,000	\$750,000	\$750,000	\$750,000	\$750,000	\$3,750,000
Supportive Housing Program - Continuum of Care	\$5,262,197	\$5,262,197	\$5,262,197	\$5,262,197	\$5,262,197	\$26,310,985
HUD Section 811 Project-Based Rental Assistance	\$110,911	\$646,666	\$783,996	\$805,924	\$829,628	\$3,177,125
RoadHome Service Enriched Rental Assistance Program	\$2,325,000	\$2,325,000	\$2,325,000	\$2,325,000	\$2,325,000	\$11,625,000
HOPWA	\$685,495	\$685,495	\$685,495	\$685,495	\$685,495	\$3,427,475
Neighborhood Opportunities Program*	\$1,300,000	\$1,300,000	\$1,300,000	\$1,300,000	\$1,300,000	\$6,500,000
Thresholds	\$1,000,000	\$1,000,000	\$1,000,000	\$1,000,000	\$1,000,000	\$5,000,000
TOTAL RESOURCES	\$16,255,423	\$16,791,178	\$16,928,508	\$16,950,436	\$16,974,140	\$83,899,685
<u>Outcomes</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 2 - Prevent and End Homelessness						
Rapid Re-Housing - Households	192	201	211	215	220	1,039
Shelter - Persons	3,171	2,929	2,772	2,642	2,512	14,026
Shelter Beds Added	35	32	29	26	24	146
Homelessness Prevented - Persons	6	6	6	6	6	30
Other - PSH Households Assisted	1,294	1,309	1,354	1,354	1,354	2,708
HIV AIDS Housing Ops	48	48	48	48	48	96
VLI Household Rent Support (NOP)	182	182	182	182	182	364
Housing for Homeless Added (Crosslisted - Goal 1)	28	24	21	21	21	115

TABLE 82 – GOAL 3: IMPROVE HEALTH / SAFETY / EFFICIENCY OF RI HOMES – ANTICIPATED RESOURCES AND OUTCOMES

<u>Resources</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 3 - Safe, Healthy, Energy Efficient Homes						
State Lead Program	\$600,000	\$400,000	\$400,000	\$400,000	\$400,000	\$2,200,000
HUD Lead Hazard Reduction Program	\$766,667	\$766,667	\$766,667	\$766,667	\$766,667	\$3,833,333
HUD Healthy Homes funding	\$66,667	\$66,667	\$66,667	\$66,667	\$66,667	\$333,333
CDBG Home Repair Program	\$983,104	\$983,104	\$983,104	\$983,104	\$983,104	\$4,915,519
TOTAL RESOURCES	\$2,416,437	\$2,216,437	\$2,216,437	\$2,216,437	\$2,216,437	\$11,282,186
<u>Outcomes</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 3 - Safe, Healthy, Energy Efficient Homes						
Home Health Hazards Remediated - hseHlds	110	95	95	95	95	490
Rental units rehabilitated	98	98	98	98	98	492
Homeowner Housing Rehabilitated	161	161	161	161	161	806

TABLE 83 – GOAL 4: PROVIDE TENANT-BASED RENTAL ASSISTANCE – ANTICIPATED RESOURCES AND OUTCOMES

<u>Resources</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 4 - Tenant-Based Rental Assistance						
Housing Choice Voucher Program (Section 8)	\$14,125,665	\$14,125,665	\$14,125,665	\$14,125,665	\$14,125,665	\$70,628,325
<u>Outcomes</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 4 - Tenant-Based Rental Assistance						
TBRA - Households	1,600	1,600	1,600	1,600	1,600	3,200

TABLE 84 – GOAL 5: ADDRESS NEGATIVE EFFECTS OF FORECLOSURE CRISIS – ANTICIPATED RESOURCES AND OUTCOMES

<u>Resources</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 5 - Address Foreclosure Crisis						
NFMC Round 7 NeighborWorks Grant	\$336,614	\$252,461	\$168,307	\$84,154	\$0	\$841,535
<u>Outcomes</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 5 - Address Foreclosure Crisis						
Homeowners Assisted	579	185	123	62	0	948

TABLE 85 – GOAL 6: NON-HOUSING COMMUNITY DEVELOPMENT – ANTICIPATED RESOURCES AND OUTCOMES

<u>Resources</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 6 - Non-Housing Community Development						
CDBG - Balance of funds (not housing or homeless set-asides)	\$2,203,535	\$2,203,535	\$2,203,535	\$2,203,535	\$2,203,535	\$11,017,677
CDBG-DR (Balance of funds)	\$6,206,110	\$3,673,473	\$3,673,473	\$3,673,472	\$3,673,472	\$20,900,000
TOTAL RESOURCES	\$8,409,645	\$5,877,008	\$5,877,008	\$5,877,007	\$5,877,007	\$31,917,677
<u>Outcomes</u>	PY15	PY16	PY17	PY18	PY19	FIVE YEAR TOTAL PROJECTION
Goal 6 - Non-Housing Community Development						
Public Facility/Imprvmt - Persons	35,000	35,000	35,000	35,000	35,000	175,000
Public Services - Persons	30,000	30,000	30,000	30,000	30,000	150,000
Public Facility/Imprvmt - Persons	100,000	70,000	70,000	0	0	240,000

TABLE 86 – AFFORDABLE HOUSING PROVIDED BY HOUSEHOLD INCOME

Goal 1 - Develop and Preserve Affordable Housing	<i>Homeless (subset of ELI)</i>	Extremely Low Income	Low Income	Moderate Income	Total
Rental units constructed	0	0	264	0	264
Rental units rehabilitated	341	609	1,826	0	2,435
Homeowner Housing Added	0	0	42	0	42
Homeowner Housing Rehabilitated	0	0	19	0	19
Housing for Homeless added	115	115	0	0	115
Rental units constructed - DR	0	0	24	0	24
Rental units rehabilitated - DR	25	50	250	0	300
Goal 2 - Prevent and End Homelessness	<i>Homeless (subset of ELI)</i>	Extremely Low Income	Low Income	Moderate Income	Total
Rapid Re-Housing - Households	1,039	1,039	0	0	1,039
Shelter - Persons	14,026	14,026	0	0	14,026
Shelter Beds Added	146	146	0	0	146
Homelessness Prevented - Persons	0	30	0	0	30
Other - PSH Households Assisted	2,708	2,708	0	0	2,708
HIV AIDS Housing Ops	84	84	12	0	96
VLI Household Rent Support (NOP)	182	182	182	0	364
Goal 4 - Tenant-Based Rental Assistance	<i>Homeless (subset of ELI)</i>	Extremely Low Income	Low Income	Moderate Income	Total
TBRA - Households	371	1,856	640	704	3,200

SP-35 Anticipated Resources – Additional Narrative

Federal Resources to Achieve State Housing and Community Development Goals

The state's previous Consolidated Plan anticipated \$35.2 million in funds from the HOME and LIHTC programs to contribute to the development and preservation of affordable housing over that five year planning period (2010-2014). Additional federal funding for these purposes through stimulus-related programs (such as TCAP, TCEP and MultiFamily Weatherization) was anticipated to provide an additional \$14.2 million in federal funds to support the capital costs of developing and preserving affordable housing, which yielded a total of \$49.4 million in federal assistance for that goal. The previous ConPlan did not anticipate the additional \$5 million in Neighborhood Stabilization Project funds that assisted capital projects for affordable housing, meaning the true estimate for federal assistance can be revised to \$54.4 million for 2010 to 2014.

The funding estimates for the upcoming planning period anticipates a significant decline in federal assistance for these purposes due to reductions in the HOME programs and the end of stimulus-era special funds for affordable housing capital costs. However, the capitalization of the Housing Trust Fund in 2014 is expected to offset some of these losses. HOME, LIHTC and the anticipated Housing Trust Fund is expected to contribute \$43.9 million over the next five years to affordable housing capital projects. While still a robust funding source that is critical to Rhode Island's affordable housing stock, federal assistance will likely be 19% less than it was in the previous planning period. As shown in TABLE 76, CDBG funds will also contribute to affordable housing capital projects, but will do so at approximately the same level as in the previous planning period.

Regulation §91.315(m) requires that the state "describe the strategy to coordinate the Low-Income Housing Tax Credit with the development of housing that is affordable to low-income and moderate-income families". As described in the state's 2015 Qualified Allocation Plan ("QAP") for its Housing Tax Credit Program, the Housing Tax Credit is expected to be the primary funding source for the development of affordable rental homes in Rhode Island. The general strategy of the Housing Tax Credit program is described on page 4 of the state's QAP, "...prioritizes strateg[ies] to redevelop neighborhoods most heavily affected by the foreclosure crisis...simultaneously endeavor[ing] to continue to provide affordable housing opportunities in communities where few opportunities currently exist". The income level of eligible tenants of Housing Tax Credit developments is most often in the low-income household range or moderate-income household range; as the minimum set-asides require at least 20% of the project must include rental units restricted to households earning no more than 50% of the area median income, or, at least 40% of the rental units be restricted to households earning no more than 60% of area median income. The QAP further protects low and moderate-income households by ensuring one-for-one replacement of the loss of any income-restricted units as a result of an eligible project's funding and ensures uniform relocation of any and all tenants as a result of a project. As summarized on page 21 of the 2015 QAP, priority will be given to developments which can viably serve: very low-income households (earning 30-50% AMI), individuals and families who have experienced chronic homelessness; and Individuals with special needs. Priority is given to these developments in the form of five bonus points allocated as noted in the Scoring Criteria section of the QAP, which begins on page 24.

The U. S. Department of Housing and Urban Development (HUD) has allocated \$19,911,000 in Hurricane Sandy Community Development Block Grant - Disaster Recovery (CDBG-DR) funds to assist Rhode Island's recovery. Previously, the state received \$8,935,237 in federal CDBG-DR funding to address the impacts of the March 2010 floods. The State anticipates that 100% of balance of these awards will be expended within the next Consolidated Plan cycle. The damage described in section NA-10 details the residential housing damage and continued concerns, which will be addressed with CDBG-DR funds. It is anticipated that approximately 13% of non-administrative spending from CDBG-DR will be on housing needs, which will support the development of housing for low to moderate income households, including many households that are either homeless or disabled.

As stated in the Section NA-10, from April 2009 to October 2012, over 4,000 individuals received assistance from the stimulus-era federal Homelessness Prevention and Rapid Re-Housing program, which injected \$7 million into the state to reduce homelessness. The previous Consolidated Plan did not include these funds in its estimates for anticipated resources. These funds will not be available in the upcoming planning period. However, Rhode Island Housing did receive an award in 2015 for the HUD 811 Project Rental Assistance operating support program, which will help 150 households over eight years with over \$5 million in rental assistance. Project management documents associated with the Rhode Island application and awarding of HUD 811 PRA funds estimate that \$3.2 million of the award will be allocated in the upcoming five year planning period. The program will focus on assisting the chronically homeless and people transitioning out of institutional care.

Apart from these changes, federal investments in homelessness in Rhode Island will be roughly the same from the previous planning period. The state priority to allocate CDBG funds to achieve homelessness-related goals, combining these funds with other formula allocations from the Emergency Solutions Grants and the Title XX-Social Service Block grants dates back to 2007 when these funds were pooled together to be administered collectively through the state's Consolidated Homeless Fund. The \$15.8 million in combined funds from the federal government for the CHF over the next five years is essentially unchanged from the previous planning period. Rhode Island will continue to apply for competitive funding grants from HUD, such as through HEARTH programs, also known as Continuum of Care funds (formerly known separately as Shelter Plus Care and the Supportive Housing Program) and the competitively awarded Housing Opportunities for Persons with AIDS program (HOPWA), and anticipates level support from these sources, an estimated \$29.7 million, over the next five years. In total, an estimated \$48.7 million from federal programs will assist in ending and preventing homelessness in the state over the next five years, a 7% decrease from the previous five years.

The National Foreclosure Mitigation Counseling (NFMC) program was launched in December 2007 with funds appropriated by Congress to address the nationwide foreclosure crisis by dramatically increasing the availability of housing counseling for families at risk of foreclosure. NeighborWorks America distributes funds to competitively selected grantee organizations, which in turn provide the counseling services, either directly or through sub-grantees. During the previous planning period, Rhode Island received \$2.4 million from NFMC. In the upcoming planning period it is anticipated that funding from this source will decline as the economic recovery continues. Rhode Island was also a recipient of HUD Housing Counseling Grants from 2010 to 2014, receiving an additional \$625,000 in awards to help mitigate the negative effects of the ongoing foreclosure

crisis, but will likely not pursue this funding in the next five years. Therefore, federal program funds to aide in addressing the foreclosure crisis in Rhode Island is likely to decline by 72% in total by the end of the next five year period compared to 2010-2014.

Rhode Island's Lead Safe Homes Program utilizes funding made available from HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH) to reduce lead-based paint hazards and other home health concerns. A competitively awarded program, Rhode Island will apply every three years, with the current grant running to 2016, at which point a new application will be required. It's difficult to anticipate the exact grant award from 2017 to 2019; the state will anticipate level funding to address the continued great need as described in section MA-20.

The Department of Housing and Urban Development (HUD) has allocated \$19,911,000 in Hurricane Sandy Community Development Block Grant - Disaster Recovery (CDBG-DR) funds to assist Rhode Island's recovery. The damage described in section NA-50 details the public facilities and public infrastructure, as well as economic development concerns, which will be addressed with CDBG-DR funds. It is anticipated that approximately 87% of non-administrative spending from CDBG-DR will be on non-housing community development needs. Non-entitlement CDBG funds, administered by the Housing Resources Commission, provides funds for non-housing community development (needs described in NA-50), when excluding housing and homelessness and Home Repair program set-asides (approximately 50% of state CDBG funds).

State Resources to Achieve State Housing and Community Development Goals

The state Housing Bond passed in 2006 contributed to the previous planning period with \$13.08 million as anticipated in the previous Consolidated Plan. Another \$25 million housing bond passed in 2012 contributed \$19.2 million of those bond funds during the previous planning period, which was not anticipated by the previous Consolidated Plan. The revised total resources estimated for capital projects to develop or preserve affordable housing provided by the state totaled \$32.28 million. State funds will contribute \$5.8 million to this goal in the next funding period, an 82% reduction from the prior five years. The Thresholds program, paid for through the state's Department of Behavioral Healthcare, Developmental Disabilities and Hospital's budget ("BHDDH") and administered by Rhode Island Housing, contributes capital funds to housing that supports those in need of BHDDH services, and is most often included as funding for homelessness, will continue to be funded by the state at \$1 million annually.

Other State Resources to Achieve Housing and Homelessness Goals

The state has supported the implementation of Opening Doors Rhode Island directly by allocating \$750,000 in state funds for rental assistance for the homeless, funding that was not included in the previous five year planning period. These funds were awarded to eligible non-profits with a proven track record of success in managing supportive housing for households with extremely low incomes, special needs and a history of homelessness. This program submits requests for proposals separately from the Consolidated Homeless Fund, but it is managed by OHCD and supports similar goals as those achieved by the CHF, combining to aide in the implementation of the strategic vision to end homelessness as outlined in Opening Doors Rhode Island. In its FY15 budget the state built on this appropriation by establishing a permanent funding stream funded through an increase in

the real estate transfer tax to fund the rental assistance program and other Housing Resources Commission programs. Through this funding stream, the state will continue to provide level funding for to Consolidated Homeless Fund over the next five years.

State allocations for the Lead Safe Homes Program averaged \$600,000 in the previous planning period. A slight reduction is anticipated as a result of shifting budget priorities in the next five years. As is described in section MA-45 and repeated in section SP-70, the state plans on increasing focus on transportation infrastructure in the upcoming five years, which should increase state support for non-housing community development activities. As described in the previous section, the state also contributes \$1 million annually in capital funds to support the development of supportive housing for those with behavioral health problems or developmental disabilities through BHDDH's annual budget (Thresholds).

SP-40 Institutional Delivery Structure – Additional Narrative

Of the Community Development and Planning programs which this Consolidated Plan addresses, Rhode Island Housing is responsible for administering the state's formula HOME program and administers a competitive HOPWA program. The Rhode Island Department of Administration, specifically its Division of Planning, administers the state's CDBG and ESG formula allocations.

The Institutional Delivery System in Rhode Island that implements the goals to be outlined in Section 45 of this Strategic Plan go far beyond these three public agencies.

Affordable Housing Production and Preservation

The two major funding mechanisms that fund new production of affordable housing are the federal formula-based HOME program and the federal formula-based Low Income Housing Tax Credit program. Both of these programs are administered by Rhode Island Housing. Funds are awarded to non-profit community development corporations and for-profit developers that secure the financing for and develop affordable housing projects. Each sponsor, once awarded funds, will engage with various contractors to deliver safe and efficient housing. Besides community development corporations, other non-profit institutions engage in the development and ownership of long-term affordable housing, such as public housing authorities and social or health service providers that find it beneficial to own the properties where they provide services to special needs populations. These sponsors and the contractors they engage in order to produce and preserve affordable housing represent the robust local network of organizations that are crucial to putting federal housing funds to work developing and preserving affordable homes. Sponsors of either large scale or small scale housing development and preservation often use their own funds or equity in property to leverage federal awards to cover the gap between subsidies and the total development of a project. Other gap funding has included Building Homes RI, the Federal Home Loan Bank of Boston's Affordable Housing Program, federal and state historic tax credit equity, energy grants from the state or from National Grid, or other project specific awards for lead work or weatherization, or a variety of other private loans or grants secured by a project's sponsor.

Prevent and end homelessness among chronically homeless, homeless veterans and homeless families while significantly reducing overall homelessness

Sometimes overlapping with the network of community-based nonprofit organizations mentioned with regards to Goals 1 and 2 is the network that delivers housing and supportive services to homeless and non-homeless special needs populations. The Consolidated Homeless Fund is a collective program that combines the entitlement ESG allocations for the cities of Woonsocket, Pawtucket and Providence with the state's ESG formula allocation, the state's Title XX Homelessness Block Grant award with the required state match for that award (known as Rhode Island Homelessness funds), a set-aside of roughly \$500,000 annually from the state's CDBG allocation and, most recently, a state appropriation of \$750,000 for the stated purpose of providing rental assistance aimed at housing stability.

The Consolidated Homeless Fund is administered by the Rhode Island Department of Administration's Division of Planning, specifically by that division's Office of Housing and Community Development. The management and implementation of this program requires coordination amongst the state and the three stated entitlement communities and the local network of non-profit housing and service providers that serve the state's homeless population. The state's Dept. of BHDDH, as well as local mental and physical health organizations, either assist the sub-recipients of the CHF program in meeting the needs of the homeless, or are sub-recipients themselves. The CHF program's goals and objectives are based on those set forth in the state's strategic plan to prevent and end homelessness, known as Opening Doors Rhode Island. Rhode Island also has an active Interagency Council on Homelessness (ICH) that includes law enforcement agencies, elderly services agencies, education agencies, child services agencies, mental and physical health service providers, hospitals and veterans affairs groups as well as the four agencies mentioned that sponsored the plan. The ICH is responsible for identifying solutions to challenges facing the homeless that require interagency collaboration.

While the Consolidated Homeless Fund focuses on emergency shelters, transitional housing and short term rental assistance (rapid re-housing and housing stability), the state's Continuum of Care program, administered by Rhode Island Housing focuses primarily on permanent supportive housing programs (72% of all funds). Twenty-one percent (21%) of Continuum of Care funds are for transitional housing projects while 4% goes to rapid re-housing initiatives. These competitively awarded federal funds used to be known separately as the Supportive Housing Program, Shelter Plus Care and the Section 8 Moderate Rehabilitation SRO Program. As the collaborative applicant for Continuum of Care funds, Rhode Island Housing, in turn, contracts with other non-profit organizations, known as sub-recipients, to operate these programs.

Rhode Island's Continuum of Care (RI CoC) recently drafted a new Charter that substantially overhauls its institutional structure. In the new Rhode Island Continuum of Care Governance Charter, it is stated that the RI CoC is advisory to the Housing Resources Commission ("HRC") and it may also make recommendations to the state's Interagency Council on Homelessness. A new Continuum of Care Board of Directors will be formed, consisting of 15 RI CoC members, and will have the responsibilities of: Operating the RICOC; Designating and operating an Homeless Management Information System (HMIS); Designating an HMIS Lead Agency; Conducting planning activities; and Ensuring the HMIS is administered in compliance with requirements prescribed by

HUD. The standing committees of the Board will include the System Performance and Planning Committee, the Recipient Approval and Evaluation Committee, Veterans Committee, Families & Youth Committee, and Chronically Homeless/High Need Individuals Committee, and the HMIS Committee. Various state personnel, staff members from Rhode Island Housing, staff members of supportive services providers and other homelessness agencies work together to serve on these committees and operate the RI CoC.

Rhode Island Housing also supports homelessness programs with its own resources, working directly with owners of developments to administer operating support for much needed supportive housing in existing affordable developments (NOP) and working with homelessness service providers to fund rental assistance and supportive services in units leased by the sponsor (RoadHome).

Improve the health, safety and energy efficiency of all Rhode Island homes

Rhode Island Housing has managed a lead safe homes program since 1994, which provides small forgivable loans to eligible applicants to address lead hazards in their homes. The agency has a program team that oversees the work that the grants (combination of state and federal) pay for, which is completed by qualified and registered private lead abatement contractors. In recent years, collaborative efforts between municipal-based lead funds and weatherization funds administered by the state's various Community Action Program (CAP) agencies (through the Weatherization Assistance Program, state administered) and the Rhode Island Housing LeadSafe Homes Program has better coordinated and targeted assistance to homes that have multiple health hazards. Over the past two years, the national Green and Healthy Homes Initiative has embarked on a Providence-based initiative, now a statewide project called the Rhode Island Alliance for Healthy Homes. The Alliance now includes over 40 organizations ranging from utility companies, energy firms, units of local government and a variety of health, education and human service-related nonprofit organizations, collaborating to increase access to and awareness of healthy homes resources, better coordinating and increasing funding for those resources, and better utilizing data to identify healthy housing problems facing the state and the progress in addressing those challenges.

Providing Tenant-Based Rental Assistance

The state's 25 PHAs as well as the state housing finance agency which administers over 1,500 housing vouchers on behalf of those municipalities without a PHA, work together directly through the Public Housing Association of Rhode Island and, more informally, to best utilize tenant-based rental assistance (TBRA) to further the state's goals. Implementation of Opening Doors Rhode Island has been bolstered by PHA's that prioritize homeless or formerly homeless households with rental assistance. In February 2015, Rhode Island Housing opened its waitlist for the first time in ten years, specifically for the homeless and formerly homeless living in permanent supportive housing that no longer required supportive services. Rhode Island Housing is also working with the Providence Public Housing Authority on a joint opening of its HCVP waitlist to the general public later this year. It is hoped that this will form the basis of a broader collaboration among state public housing authorities.

Addressing the Negative Impacts of the Foreclosure Crisis

The main institutional delivery system for reducing foreclosures was created in 2013 with passage of the state's foreclosure mediation law. The Rhode Island General Assembly passed and the Governor signed into law legislation which provided new protections to help struggling homeowners avoid foreclosure and remain in their homes.

The new law, R.I.G.L. §34-27-3.2, went into effect September 13, 2013 and requires that lenders notify homeowners before they become 120 days delinquent on their mortgage that they have the right to a foreclosure mediation conference. The statewide law starts the outreach process earlier, providing homeowners with the resources they need early enough in the foreclosure process to make a difference. The law ensures that every Rhode Island homeowner who is having trouble making their mortgage payments be given the opportunity to communicate directly with their lender to try and find a solution that will help them get back on track with their mortgage and remain in their home.

Rhode Island Housing provides mediation services under the new law. There is no cost to the homeowner for the mediation conference or the housing counseling they receive. Many of those that work with the mediation coordinator find the mediation process facilitates a conversation with their lender that often results in a mortgage modification to allow them keep their home, or to come up with some other alternative to foreclosure. Since the new law went into effect, Rhode Island Housing has sent outreach letters offering mediation services to over 9,000 homeowners across the state.

- 71% of homeowners who have completed the mediation process have been able to enter into a workout agreement with their lender.
- Another 188 of the homeowners who were notified of their right to mediation were able to achieve a workout agreement with their lender even before the mediation conference occurred.

In addition to helping homeowners, the legislation also provides real benefits to lenders and municipalities. Foreclosures are also expensive and resource intensive for lenders. A mutually acceptable resolution that results in the homeowner making payments, even at a lower level, is better for the lender than incurring the time and expense of the foreclosure process. From the municipalities' perspective, foreclosed and abandoned properties have a blighting effect on the surrounding neighborhoods and bring down property values and tax revenues.

The programs that develop and preserve affordable housing have included the revitalization of foreclosed properties into scoring criteria of project proposals. The Housing Tax Credit program utilized the Neighborhood Stabilization Program and the Rhode Island Housing Land Bank programs to purchase foreclosed properties for the purpose of combining them into larger development proposals. Olneyville Housing Corporation has purchased thirteen foreclosed properties and successfully integrated them into larger Housing Tax Credit developments, as part of that organization's broader interest in addressing the foreclosure crisis in its hard-hit neighborhood. Smith Hill Community Development Corporation also has used the land banks to purchase foreclosed homes as part of Housing Tax Credit projects, as well as purchasing foreclosed homes to use HOME or BHRI funds to revitalize these properties as low-income homeownership

opportunities. The methods of distribution for all three capital-funding programs include the rehabilitation of foreclosed properties as a priority for funding.

Non-Housing Community Development

OHCD staff processes and monitors the state CDBG program, fielding applications from units of general local government (UGLG) for the funding of local community development needs. Each UGLG is responsible for the program compliance of its sub-recipients. The most common sub-recipients of state CDBG funds tend to be community-based non-profit institutions, including food pantries, CAP agencies, CDCs, senior centers, boys and girls clubs and social service agencies. For public infrastructure and public facility projects, it is a UGLG's departments (parks, forestry, highway departments, etc.) that use the funds to complete community development goals. The institutional delivery structure for community development includes mainly local entities.

Affirmatively Furthering Fair Housing

Vigorous and comprehensive enforcement of fair housing laws is essential to furthering fair housing, and there are a number of organizations in Rhode Island that play a role in the state's fair housing enforcement infrastructure. Foremost among these are the Rhode Island Commission on Human Rights and the U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. These are the agencies to which residents who believe they have experienced discrimination in violation of federal or state laws may register their complaints. Other entities with fair housing interests, obligations and responsibilities include jurisdictions that receive and allocate funding from the federal government for housing and community development programs (the Office of Housing and Community Development (OHCD), the Entitlement Communities, other municipalities who receive federal funds through OHCD, and the state's 26 public housing agencies, including Rhode Island Housing). Disability and civil rights groups, housing providers and real estate professionals, the legal community, and many others have important roles as well.

Primary responsibility for the administrative enforcement of housing discrimination laws in Rhode Island is shared by the Office of Fair Housing and Equal Opportunity of the U.S. Department of Housing and Urban Development (FHEO) and the Rhode Island Commission for Human Rights (RICHR). Their jurisdiction depends on the authority delegated by the underlying laws, the classes of people protected by each law, and the type of the housing involved in a complaint of discrimination, and may overlap.

RICHR, established by the General Assembly in 1949, is one of the oldest state antidiscrimination law enforcement agencies in the country. In addition to enforcing the state's Fair Housing Practices Act (FHPA), the Commission enforces Rhode Island antidiscrimination laws in the areas of employment, public accommodations, credit and delivery of services. RICHR is a HUD-designated Fair Housing Assistance Program (FHAP) agency; as such, it receives funding from, and shares federal Title VIII enforcement activities with HUD. When charges are filed alleging a violation of both state and federal law ("co-filed" charges), RICHR processes the complaint. In addition, Commission Legal Counsel presents or assists in presenting cases of fair housing discrimination at trial/hearing in those cases in which probable cause has been found. Where probable cause is

found, the Commission's Executive Director will attempt to conciliate the matter. If conciliation is not achieved, the Commission issues a formal complaint and notice of hearing. Under the state FHPA, once a complaint and notice of hearing is issued, the parties have the right to elect that the matter be heard and decided in state Superior Court.

Residents of Providence have the additional option of bringing complaints to the Providence Human Relations Commission, and the Governor's Commission on Disabilities has the power to investigate complaints of violations related to the Americans with Disabilities Act (ADA), including the physical inaccessibility of buildings and structures. However, neither of these is a Fair Housing Assistance Program and neither is certified as substantially equivalent to investigate and adjudicate complaints. They would simply forward the complaints to RICHR or HUD.

The nonprofit RILS provides a full range of legal assistance, including advice and brief service, investigation, negotiation, and litigation in all state and federal trial and appellate courts. RILS also provides community legal education services to its client community and is the State's major law firm for low-income people with civil legal problems. RILS is funded, in part, by the Legal Services Corporation, a publicly funded, nonprofit corporation established by Congress in 1974 to provide civil legal assistance to those who otherwise would be unable to afford it. RILS provides legal assistance to low income individuals experiencing housing discrimination issues through its Housing Law Center. Rhode Island also has a joint website that provides information to tenants, homebuyers, sellers and agencies about the laws governing fair housing and compliance with those laws. The website, www.fairhousingri.org, offers insight into the practical elements of buying and renting, including a catalogue of the warning signs of discrimination, and information on who to contact concerning fair housing complaints.

Rhode Island Disability Law Center (RIDLC)

The Rhode Island Disability Law Center (RIDLC) provides free legal assistance to persons with disabilities. Services include: individual representation to protect rights or to secure benefits and services, self-help information, educational programs and administrative and legislative advocacy. Of the cases taken by RIDLC, approximately 80 to 90 percent are mediated to a successful resolution.

Rhode Island Association of Realtors

The Rhode Island Association of Realtors requires members to participate in its courses on fair housing laws. The Association also offers a three-hour course on the Americans with Disability Act (ADA). These courses describe techniques to deal with communication and mobility issues that are unique to people with disabilities. Course content is developed collaboratively with RICHR and the Governor's Commission on Disabilities. The Rhode Island licensing examination for realtors requires knowledge of fair housing laws and the ADA.

Governor's Commission on Disabilities

Rhode Island has had a centralized focal point for issues of concern to residents with disabilities for more than a half century, but in 1992 the Governor's Commission on Disabilities was designated by law as the agency with the responsibility for state government compliance with the Americans with Disabilities Act (ADA) and all other state/federal laws protecting the rights of people with

disabilities. The Commission's objective is to ensure that all people with disabilities in the state are afforded the opportunities to exercise all the rights and responsibilities accorded to Rhode Island citizens, and each person with a disability is able to reach his/her maximum potential in independence, human development, productivity and self-sufficiency.

The Commission assists the Rhode Island Association of Realtors and the Board of Realtors by conducting classes on fair housing for people with disabilities and the ADA. It also assists the Rhode Island Commission for Human Rights to mediate disability discrimination complaints filed against realtors. Although staff is limited at the present time, the Governor's Commission conducts on-site accessibility assessments and issues recommendations to public and private building owners on how to remove architectural barriers. Annually the Commission conducts a series of public forums to identify the concerns of people with disabilities and their families.

The Rhode Island Developmental Disabilities Council

The Rhode Island Developmental Disabilities Council is a 24-member council appointed by the Governor that works to promote changes that make it possible for people with developmental disabilities to fully participate in community life. Most of the commission members are people with developmental disabilities and/or their family members. Others are representatives of agencies and groups that work for people with disabilities. All offer exceptional insight into the obstacles that confront people with disabilities throughout their lives: issues involving education, employment, transportation, housing, recreation, and health care, among others. The Council works to promote creative ways that families, service agencies and federal, state and local governments can work together so that people can live more independent, fulfilling lives.

Assess the Strengths and Gaps in the Institutional Delivery System

Strengths

The strengths of the institutional delivery system spring from Rhode Island's miniature geography. The institutions and persons within those institutions that administer programs often have lengthy professional relationships with applicants for funding and often know the local market conditions and physical site related to a development proposal. This intimacy with the surrounds allows for both program administrator and sponsor to address feasibility concerns and also how to gain efficiencies by localizing the work. It has also helped that Rhode Island Housing has developed pre-development financing tools, such as the Rhode Island Housing LandBank, which is often also reflective of local knowledge of how valuable a plot of land truly is with respect to future affordable housing development. Without such knowledge and resource, plots of land would be lost before financing can be pooled together to advance developments. In many ways, the robust network of community development corporations and other non-profit housing developers serve as a hub of technical ability, one that can be leveraged by other organizations in need to understand compliance, application and implementation capacity.

The outreach from the state (both RIH and OHCD) to provide technical assistance to organizations that want to build high-priority housing is another advantage of Rhode Island's miniscule square mileage. It is certainly a strength of the delivery system that developer and administrator meet so often to discuss what is feasible, what is most needed, from what examples can implementation

details be borrowed, and what knowledge gaps exist in order to development to move forward. The relationship between state agency personnel and city and town personnel is also a source of strength, especially so in the case of local planning and municipal-state partnerships like the CDBG program and the state's safe and healthy homes initiatives. For instance, a project that began in 2014 brought together the Rhode Island Department of Health (keepers of blood-lead level data), Rhode Island Department of Human Services (administrators of state Low Income Heating and Energy Assistance Program) community action program agencies (Weatherization Assistance Program administrators), Rhode Island Housing (Lead Safe Homes Program administrators), the City of Providence (which had its own healthy homes funds from the federal government) and National Grid (utility provider) to target funding and bundle services to the most in-need homes in the City of Providence. RIDHS and RIDOH worked through their internal data to find LIHEAP qualified households with a child with evidence of lead poisoning, while Rhode Island Housing, the City, and a CAP agency each addressed lead and other health and safety hazards in those homes once National Grid coordinated an energy audit. The targeting of multiple resources toward specific needs, and in the given example's case, specific households, is the key strength of the institutional delivery system. The Consolidated Homeless Fund, described multiple times in this Consolidated Plan, is another example of that strength.

Gaps

The network that works to address the state's housing needs, though in general a key strength of the delivery system has some gaps in it. As so much of public governance has moved online and has permanently mothballed pen and paper systems, still too much of the housing assistance system relies on bulky, unreliable and difficult to process systems. Especially in the programs that address preventing and reducing homelessness, there has not been enough coordination among the major service providers in terms of best practices. The new coordinated access system and the creation of the Interagency Council on Homelessness and the statewide initiatives described in the OpeningDoorsRI plan all serve as resources and systems that will close this gap. A related delivery system gap is the lack of centralized and up-to-date information on affordable (deed-restricted or market-based) housing opportunities for households that would not generally know their options, especially those outside of the urban core. The vast network of public housing authorities and other housing providers (Rhode Island Housing as administrator of HCVP for non-PHA municipalities among other rent subsidy programs, for example) do not maintain shared or coordinated waitlists for sub-populations of households. Attempts have been made to develop universal waitlists for elderly and non-elderly public housing, with multiple stakeholders involved in the developments and maintenance of such resources.

Another major gap in the institutional delivery structure is the ability of the state to guarantee both capital and operating support to projects that address priority needs, especially the need to permanently support extremely low income households that are at risk of homelessness. Recently completed and funded Housing Tax Credit projects have included the conversion of former navy land into housing for homeless families known as Kingstown Crossings (receiving project-based PHA vouchers via Rhode Island Housing), the Phoenix Apartments project that substantially rehabilitated the scattered site Section 8 supported development known as Medina Village and the new Veterans for Tomorrow project that will develop the Heaton and Cowing Mill building into 20 VASH-supported (via the Providence Housing Authority) apartments for homeless veterans. These are three examples of exceptional projects that leveraged federal capital subsidies into major

construction jobs that rehabilitated unused housing or housing in disrepair into bright spots in their respective neighborhoods while supporting a moribund state construction sector. However, rental assistance voucher commitments tied to those projects allow sponsors to serve populations most in need with quality housing and services while keeping the projects solvent with ongoing operating subsidies. The need is great for these types of projects, but too many similar development applications for large scale residential housing re-investment in blighted neighborhoods go unfunded because operating subsidies are unattainable or ineligible.

The state's strategy for overcoming this gap in its institutional structure will be to amend its current systems to help serve this need and advocate for and apply for increased funding from the federal government. Project-based vouchers through Public Housing Authorities (local and state) have already been used to provide the necessary operating support needed to ensure viability of large scale affordable housing projects, as was the case in the Kingstown Crossings and Veterans for Tomorrow projects. The state also received a demonstration grant through the HUD 811 Project Rental Assistance program through a competitive application process, which will provide over \$5 million in operating support for a projected 150 households in the next eight years. It is likely that many of these permanently supported households will be part of large scale affordable housing development and preservation capital projects.

Mental health services offered through CHF and CoC programs include: case management to access housing, transportation, legal, financial, money management needs and resources; assistance in accessing benefits and entitlements and for assuring income maintenance; substance abuse and vocational counseling; help in developing communication skills and symptom self-management; help in developing communication skills and social networks; and assistance in utilizing, locating and coordinating the community medical, social, mental health, substance abuse, legal services, vocational and educational resources.

Various organizations offer services targeted to particularly vulnerable populations. Amos House offers parenting skills to mothers taught by licensed clinicians. AIDS Care Ocean State provides treatment adherence and crisis intervention services to persons living with HIV/AIDS while also organizing support groups. Operation Stand Down Rhode Island not only provides direct services and helps in providing referrals for mainstream resources, but also connects Veterans to VA and other applicable benefits. Riverwood Mental Health Services develops individual plans of service for chronically homeless households, providing housing under the Housing First model and providing Community Psychiatric Support Treatment along with case management.

TABLE 79B – HOMELESS SERVICES PROVIDERS IN RHODE ISLAND

Organization Name	ES	PSH	TH	SSO	Pop Focus (if any)
AIDS Care Ocean State	0	48	0	No	HIV/AIDS
Amos House	25	16	17	No	Re-entry/Recovery
Blackstone Valley Advocacy Ctr.	23	0	18	No	DV
Child and Family Services of Newport County	0	0	25	No	Women
Community Care Alliance - Family Resources CAP	56	36	24	No	HIV/AIDS (some)
Community Care Alliance - NRI Mental Health Center	0	32	5	No	Mental Illness
Crossroads Rhode Island	117	642	69	No	
Diocese of Providence	35	0	0	No	
Domestic Violence Resources Center of South County	12	0	12	No	DV
East Bay CAP	0	27	30	No	
East Bay Center Inc.	0	59	0	No	
Elizabeth Buffum Chase Center	0	0	16	No	DV
Fellowship Health Resources	0	2	0	No	
Gateway Healthcare	0	15	9	No	Mental Illness
House of Hope CDC	112	47	3	No	
Kent Center	0	41	0	No	
Lucy's Hearth	24	4	9	No	
MAP Alcohol and Drug Rehabilitative Services Inc.	0	0	3	No	Recovery
McAuley Ministries	0	3	57	No	
MHARI/Access-RI	0	6	0	No	Mental Illness
New Hope for Families	18	10	0	No	
Newport County Community Mental Health	0	22	0	No	Mental Illness
Nickerson Community Center	0	0	50	No	
Operation Stand Down Rhode Island	0	39	6	No	Veterans
Pawtucket Central Falls Development Corp	0	11	0	No	
Providence Center	0	124	12	No	Mental Illness
Providence Housing Authority - VASH	0	95	0	No	Veterans
Providence In-Town Services Association	0	0	0	Yes	Outreach
Providence Rescue Mission	120	0	0	No	
Rhode Island Coalition for the Homeless	0	0	0	Yes	Legal Services
Rhode Island Veteran's Home VTSP	0	0	4	No	Veterans
RI Family Shelter	27	22	0	No	
Riverwood Mental Health Services	0	167	0	No	Mental Illness
Shelter Services of RI	0	0	10	No	
Sojourner House	11	0	0	No	DV
Sstar of Rhode Island	0	0	14	No	Recovery
Westerly Area Rest Meals, Inc.	35	34	29	No	
Washington Square Services Corp.	25	38	27	No	
Welcome House of South County	17	0	0	No	DV
Westbay CAP	0	31	0	No	
Women's Center of Rhode Island	34	0	0	No	Women
Women's Resource of Newport and Bristol County	8	0	0	No	Women
YWCA of Greater RI	0	8	0	No	Women

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

Housing stability concerns

One gap in the delivery structure of housing for special needs populations at risk of homelessness was the varied methods for assessing homelessness recidivism likelihood and the level of service needed to support underlying causes of homelessness.

The Continuum of Care has adopted the Vulnerability Index-Service Prioritization and Data Analysis Tool (VI-SPDAT) to identify needed housing and services. This tool is used when a person is first entered into the HMIS. Once assessed, those needing permanent supportive housing are referred to the coordinated entry system to match the person with available units. If a match is not found the person is referred to a housing placement committee to better understand the housing needs and services of the person and to facilitate an appropriate housing referral. All homeless service providers will use the VI-SPDAT through HMIS as part of a new coordinated access system for all Continuum of Care members. With the new Coordinated Access System, that all Continuum of Care and Consolidated Homeless Fund service providers will now use, a single intake system will be used to assess and assist all eligible populations.

Preventing recidivism

In order to prevent a return to homelessness, which can occur as a client ‘falls through the cracks’ when trying to transition from one housing program to another, the Continuum of Care will be requiring new case conferencing procedures to create actionable transition plans for moving a client who is not succeeding in one housing program to move to another.

Housing retention services

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

Use of peer mentors

The Continuum of Care will encourage the employment of formerly homeless individuals to assist in connecting newly housing homeless persons to community supports. All of these strategies related to observed gap in the institutional focus to move those that no longer need the services supports associated with permanent supportive housing to mainstream housing.

Employment first

The Employment First Program promotes community-based, integrated employment as the first option for employment services for individuals with disabilities.

The RI Continuum of Care has experienced low frequencies with regards to increasing earned income from entry to exit. Recognizing the importance of earned income for the disabled, BHDDH is creating an Employment First Program, adopted by the Office of Rehabilitation Services and the Rhode Island Department of Education. The policy will impact the populations housed in permanent supportive housing by identifying supportive companies and providing the necessary

services to maintain a job. Transitional housing has no disability requirement, unlike permanent supportive housing, for its participants, and should be able to be more successful in meeting the 20% goal of gaining increasing earned income from entry to exit, though this remains a challenge given Rhode Island's high unemployment rate. One of the strengths of the transitional housing programs has been the high percentages of residents increasing earned income while residents. A review with a Continuum of Care program coordinator to develop plans for projects not meeting 20% will be required and all transitional housing programs will need to meet a threshold of 22% increasing earned income in order to receive a high ranking. Those not meeting that threshold will be ranked lower. Transitional housing is targeted to assist those with short term needs with temporary housing assistance, and projects will need to partner with employment and training resources and document successful referrals to prove they are meeting the goals of this targeted program.

Mainstream benefits

The Rhode Island Continuum of Care's 67% achievement for access to mainstream benefits from entry to exit is attributable to the outreach activities of the state's SNAP for food stamps and the SOAR program for access to Medicaid. A strategy to improve this rate will be increasing training of project staff in accessing the Rhode Island Health Exchange to increase the number of non-disabled receiving health insurance. Strengths that have led to the successful mainstream benefits rate includes the real time knowledge of available resources through an active listserv of shelter providers as well as the strong linkages between project staff and state outreach workers and overarching policies by agency directors that have ensured Rhode Island's homeless population receives the services they deserve. The Interagency Council on Homelessness, in particular, is working on procedural changes to some existing benefit streams in order to improve already-high success rates in new ways, such as the expansion of TANF funds for rental assistance and the set-aside of Section 8 units for the homeless.

Rapid Re-Housing

The HPRP program in Rhode Island was an effective supplement to existing housing programs in preventing and reducing homelessness. With the end of HPRP funds from the federal government and cuts to state emergency housing assistance programs, Rhode Island has looked to maintain its rapid re-housing successes with sources of funding not previously used for that purpose. Rhode Island Continuum of Care funds will be used to fund rapid re-housing starting in 2015, replacing some social services only (SSO) programs. The state's ESG allocation goes to support the intensive housing stabilization program (IHSP), which continued the work of HPRP at a much-reduced rate as part of the Consolidated Homeless Fund. With some added assistance from the United Way, rapid re-housing through the CHF will increase in 2015 as well. In total, these two rapid re-housing programs will assist 70 families in 2015 (all rapid re-housing programs in Rhode Island will serve homeless or at-risk families). Chronic homelessness among families should be eradicated in the state as a result of this new policy direction. This targeting of homeless families with rapid re-housing program will also include participation in the new coordinated access system among all service providers in order to ensure that the most in-need families receive services.

SP-80 Monitoring – Additional Narrative

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

HOME

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

To insure compliance with the requirements of HUD and Corporation Regulations, Rhode Island Housing will conduct on-site inspections and financial oversight in accordance with 92.504. HOME Program Support Specialists conduct annual file reviews and Home Quality Standards inspections. The Support Specialist sends each HOME unit sponsor a request letter for copies of files for the file review and to arrange an appointment to conduct the inspection. HOME Support Specialists currently use the standards outlined in HUD Form 52580-A, completing a full review of the site, rating 74 home quality standards as either Pass, Fail or Inconclusive. If one of the 74 standards measures a Fail, then the unit fails the minimum housing quality standards inspection and a discussion with the owner takes place to address repairs noted that would be necessary to bring the unit up to the standard. HUD Form 52580-A includes all required standards in §92.251(c), specifically regarding compliance with state and local building codes, accessibility, disaster mitigation, health and safety, lead-based paint, and all other standards listed under 24 CFR 982.401. It should be further noted that per the 2013 HOME Final Rule, all HOME units committed funding after 1/24/15 will be required to be reviewed under the new Uniform Physical Condition Standards (UPCS) on an ongoing basis; however, as of October 2015, guidance from HUD has not yet provided additional guidance on these standards. After the review and the inspection take place, and the Support Specialist then sends the sponsor a follow up letter regarding findings of the reviews and necessary actions that must be taken. Tenants agree in their leases to provide information to the landlord on rents to complete occupancy reports. Each unit is assessed for compliance using information in the file reviews, such as the occupancy information, utility allowances and the level of rent being charged.

Rhode Island Housing is developing a risk-based system that will evaluate each project's ability to maintain and properly manage its physical assets as well as establish clear, well organized and accurate tenant files. The risk-based program will be used to determine which properties require more frequent or more intensive monitoring. A policy and procedures manual will include an annual

monitoring plan and schedule that will incorporate the risk-based findings. Approved and adopted regulations will be included in the Program Year 16 Annual Action Plan.

CDBG

The State of Rhode Island has developed and implemented a recipient review system. The purpose of this system is to determine whether recipients have carried out CDBG activities in a timely manner and in accordance with the primary objectives, applicable laws, regulations and executive orders.

In designing the review system, special attention was given to Rhode Island's rather unique situation. As a state in which no community is more than 45 minutes away and there are only 33 communities eligible for the Small Cities Community Development program, Rhode Island affords the State community development staff the opportunity to be familiar with each eligible recipient, as well as the impact of each project on the local area.

The State has developed a CDBG Management Handbook that instructs communities on the various regulations of the program and requires program recipients to submit written progress reports, the primary of which are the Quarterly Progress and Close-Out Reports.

The Quarterly Progress report includes data relative to the extent to which persons or households have benefited from CDBG activities as well as status narratives. The program Close-Out report requires recipients to provide all accomplishment information at the completion of funded activities.

Tracking and review of these reports constitutes a major portion of the off-site recipient review. This system permits state staff to remain current relative to recipient progress and to identify problem areas that require special attention.

The State Community Development staff makes every effort to visit each recipient several times during the grant period. The staff reviews all reports and requests for technical assistance, and gives weight to each of the following criteria (risk-based approach) when scheduling on-site monitoring in an effort to ensure that visits take place at the most optimum time.

CRITERIA:

1. Towns with identified management concerns which may impact the local administration of the CDBG program
2. Close-Out requests reviewed
3. New CDBG administrative staff
4. Stalled programs
5. Complexity of the projects
6. Projects with no prior review
7. Town with audit findings
8. Requests for assistance
9. Standing of grants, percentages of funds drawn
10. Community's past performance

On-site monitoring visits are documented in a monitoring report. This report is submitted with a cover letter summarizing any finding and indicating actions necessary to resolve them.

ESG

Program Monitoring Overview

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

- Carrying out activities as described in their contracts (as modified or amended).
- Carrying out the program in a timely manner, in accordance with the CHFP contract.
- Charging only eligible costs to the program or project.
- Complying with other applicable laws, regulations and terms of the CHFP contract.
- Conducting the program in a manner that minimizes the opportunity for fraud, waste and mismanagement.
- Have a continuing capacity to carry out the approved program.

Risk-Based Analysis

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

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

ESG subrecipients who are identified as high-risk through this process are monitored at least once every two years. Programs scoring 7 and above are considered high risk and programs scoring 5 or more are considered medium risk.

Management of Monitoring Activities

OHCD staff monitors subrecipients' performance utilizing a combination of desktop and on-site monitoring.

1. Desktop Review Monitoring - Desktop review monitoring is an on-going process of reviewing grantee performance that uses all available data in making judgments about grantee performance and is conducted by the OHCD or the respective ESG entitlement

community. Among the sources of information to be reviewed during a desktop review are:

- Request for Reimbursement and back-up documentation provided.
- Audit Reports
- Approved Applications
- Quarterly/Progress Reports
- Citizen and Client complaints

Analysis of the data may indicate the need for a special monitoring visit to resolve or prevent a problem.

2. On-site Monitoring- In addition to desktop monitoring, OHCD or the respective entitlement community, may conduct an on-site monitoring visit. On site monitoring visits shall be conducted as necessary. Areas to be monitored may include, but are not limited to:

- Project Progress
- Overall Program Management
- Shelter/Facility
- Policies and Procedures (especially those relating to the ESG Program)
- Contract Management
- Financial Management
- HMIS and Data Tracking
- Client File Review
- Record Keeping

Subrecipients are contacted at least one month prior to the planned date of an on-site monitoring to schedule. Once a date has been set, a formal written letter is sent to confirm:

- the date and time of the visit;
- the names and titles of the staff conducting the monitoring,
- the elements of the program to be monitored; and
- the files and records to be reviewed.

OHCD staff complete the following steps when conducting an on-site monitoring:

- Conduct an entrance conference with the executive director, director of programs, or other subrecipient official to explain the purpose and schedule for the review;
- Interview members of the subrecipient staff to gather information about subrecipients activities and performance;
- Review additional materials provided by the subrecipient that provide more detailed information about the program/project;
- Examine a sample of expenditures for required documentation and to verify the accuracy of information provided on invoices;
- Perform a fiscal review of the program to assure compliance with applicable OMB circulars;

- Review a sample of client files for required documentation that program participants meet eligibility requirements and that they are provided access to supportive services; and
 - Hold an exit interview with appropriate subrecipient staff to discuss the preliminary conclusion of the review and identify any follow-up actions the subrecipient will need to take.
3. Monitoring Results - Within 60 days after completion of monitoring, CHFP will send written correspondence to the subrecipient describing the results – in sufficient detail to clearly describe the areas that were covered and the basis for the conclusions. Each monitoring letter will include:
- the program monitored;
 - the dates of the monitoring;
 - the name(s) and title(s) of the CHFP staff person who performed the monitoring review;
 - a listing of the program activity areas reviewed (which, in most cases, will repeat the areas outlined in the notification letter to the participant);
 - if applicable, a brief explanation of the reasons why an area specified in the notification letter was not monitored (e.g., time constraints, unanticipated problems arising in another area);
 - monitoring conclusions;
 - if applicable, clearly labeled findings and concerns;
 - if there are findings, an opportunity for the program participant to demonstrate, within a time prescribed by HUD, that the participant has, in fact, complied with the requirements;
 - response time frames, if needed;
 - an offer of technical assistance, if needed, or a description of technical assistance provided during the monitoring.

HOPWA

Rhode Island Housing, its agents and designees shall have the right, from time to time, to inspect each unit for purposes of ensuring compliance with the terms and conditions of this Agreement and the Rules and Regulations.

The Sponsor agrees to permit Rhode Island Housing, its agents and designees 1) to gain reasonable access to the HOPWA assisted housing, and 2) to examine its books and records, including all financial statements and records, from time to time, insofar as the same may apply to the Sponsor's use of the HOPWA proceeds. The Sponsor further agrees to furnish such other information to Rhode Island Housing, as and when reasonably requested, for the purpose of determining the Sponsor's compliance with this Agreement and the Rules and Regulations.

All records specified in the Rules and Regulations must be maintained by the Recipient and ACOS agrees to provide access to Rhode Island Housing or its designees to the following documents as needed:

Client Files

- Medical documentation confirming client’s HIV/AIDS status if applicable
- Homeless Verification
- Verification of client’s sources of income or employment
- Verification of disability if applicable
- Annual income re-certifications and resident rent payment determination
- Case management plans stating long and short term goals
- Documentation of the services and referrals provided to clients

Procedural Documents

- Written procedures for the termination of participation, which outline the minimum due process requirements for termination
- Written Policy for procurements
- If an additional client contribution is charged, a written policy approved by Rhode Island Housing detailing how the fee is set and implemented is required. The letter from Rhode Island Housing approving the program fee must be in the file.

Financial Documents

- Written procedures covering the recording of transactions, an accounting manual and a chart of accounts or other documentation of a proper accounting system
- Policy manual or other written procedures covering the authority for approving financial transactions, ensuring that internal controls are in place.
- General Ledger
- Chart of accounts
- Board approved agency budget
- Audits and resolutions of Audit findings
- Supporting documentation for invoices, contracts and purchase orders
- Annual line item budgets for use of HOPWA funds and match
- Time Sheets and schedules of all employees

Administrative Documents

- Written procedures and staff training efforts regarding confidentiality and physical security;
- A board approved Code of Conduct governing employees, officers or agents engaged in the award and administration of contracts supported by grant funds.
- Written procedures of the method used for tracking client’s eligibility and determining the resident rent payment
- Agreements with qualified service providers for the provision of services to residents at the community residence.
- Organizational staffing chart that sets forth the lines of responsibility
- Job Descriptions
- Copy of Fidelity Bond coverage for responsible officials
- Minutes of Board Meetings, reflecting the actions of the Board; maintain and distributed to and approved by Board Members.

Continuum of Care

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

Monitoring may cover some or all of the four major areas:

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

On-site monitoring consists of the selection and review of at least 10% randomly selected files. Prior to monitoring we request sponsors to make accessible all programs files for random selection. If those files are inconsistent, missing forms, lacking appropriate documentation for client eligibility or rent calculations, etc. proceed to review an additional 10% of randomly selected files; and so on and so forth.

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

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

After the monitoring review, sub-recipients, if applicable, may receive a written response to the results of the monitoring. If there were no issues identified during the monitoring letters should go out within 90 days after the visit. However, if minor issues are identified and shared with the sub-recipient during monitoring allow sponsors to remedy the issue prior to a written response. Identified issues should be divided into findings (issues which effect program regulations or federal laws) concerns (issues that denote an area of weakness which if not addressed could lead to a finding) and recommendations (issues which do not). Those programs receiving findings or concerns should receive a follow-up letter with the list of finding or concerns and their respective corrective actions. Each finding should reference the federal regulation that was not met. The letter should also specify a timeframe for when the HEARTH Coordinator will follow-up with another monitoring visit, within a 6 month period, to ensure that corrective action has been taken.

Information requirements

Data Quality Standards for CoC sub-recipients were improved in 2013 to develop distinct categories of requirements, describing standards for timeliness, completeness, quality, accuracy and

consistency. The Rhode Island Coalition for the Homeless manages the state's Homelessness Management Information System (HMIS), and provides training on these standards to the sub-recipients.

The purpose of monitoring is to ensure that the standards on the extent and quality of data entered into the Rhode Island Continuum of Care (CoC) Homeless Management Information System that have been agreed upon by the CoC and their homeless service providers are met to the greatest possible extent and that data quality issues are quickly identified and resolved.

Continuum wide reports are reviewed by the Data and Engagement Committee on a quarterly basis. (AHAR, APR, QPR). The committee reviews sponsors that consistently do not meet these standards or do not improve their 'scores' and determine incentives and/or corrective action to have the sponsor meet its obligation. An annual report will be created by the committee to give to the Continuum of Care board to assist them in determining renewal amounts and new projects.

These protocols ensure that the state has open access to all grant-related information, including program participant and financial records.

AP-15 Expected Resources – Additional Narrative

The state anticipates availability of approximately **\$42.9 million in federal funds in the first program year** of the 2015-2019 Consolidated Plan time period. Non-federal public and private funds that will directly assist CPD funded programs is estimated to be \$13.4 million, 73% of this non-federal funding comes from the state budget, the other 27% from Rhode Island Housing’s resources. The programs that these funds assist also rely on leveraged private financing, especially those programs associated with Goal 1: Develop and Preserve Affordable Housing Opportunities. The new Housing Trust Fund will require administrative work in this upcoming program year, but funds will likely not be available until later in this Consolidated Plan time period.

TABLE 87 – ANTICIPATED RESOURCES BY GOAL, FIRST PROGRAM YEAR

Goal	Funding	Source Type	\$ PY15
Goal 1 Develop and preserve affordable housing opportunities	HOME	Federal	\$3,002,167
	9% LIHTC - TC allocation only	Federal	\$2,680,000
	CDBG - 25% of awards (total housing set asides)	Federal	\$1,228,880
	Building Homes Rhode Island	State	\$5,800,000
	Housing Trust Fund - HERA 2008	Federal	\$0
	4% LIHTC - TC allocation only	Federal	\$1,200,000
	CDBG-DR Housing	Federal	\$893,890
	GOAL TOTAL	TOTAL	\$14,804,937
Goal 2 Prevent and end homelessness among chronically homeless, homeless veterans and homeless families while significantly reducing overall homelessness	State Rental Assistance	State	\$750,000
	Emergency Solutions Grants Program - Entitlements	Federal	\$718,236
	Emergency Solutions Grants Program - Statewide	Federal	\$668,699
	Social Service Block Grant, Title XX	Federal	\$1,272,385
	RI Homelessness Funding	State	\$1,662,500
	CDBG Homeless Setaside	Federal	\$500,000
	Supportive Housing Program - Continuum of Care	Federal	\$5,262,197
	HUD Section 811 Project-Based Rental Assistance	Federal	\$110,911
	RoadHome Service Enriched Rental Assistance Program	RI Housing	\$2,325,000
	HOPWA	Federal	\$685,495
	Neighborhood Opportunities Program*	RI Housing	\$1,300,000
	Thresholds	State	\$1,000,000
	GOAL TOTAL	TOTAL	\$16,255,423
Goal 3 Improve the accessibility, health, safety, and energy efficiency of all Rhode Island homes	State Lead Program	State	\$600,000
	HUD Lead Hazard Red. Prog (Lead and Healthy Homes)	Federal	\$833,333
	CDBG Home Repair Program	Federal	\$983,104
	GOAL TOTAL	TOTAL	\$2,416,437
Goal 4 Provide Tenant-Based Rental Assistance to meet housing needs of lowest income households	Housing Choice Voucher Program	Federal	\$14,125,665
	GOAL TOTAL	TOTAL	\$14,125,665
Goal 5 Address Negative Impacts of Foreclosure Crisis	NFMC NeighborWorks Grant	Federal	\$336,614
	GOAL TOTAL	TOTAL	\$336,614
Goal 6 Promote economic development by addressing non-housing community development needs	CDBG - Balance of funds	Federal	\$2,203,535
	CDBG - DR Balance of funds	Federal	\$6,206,110
	GOAL TOTAL	TOTAL	\$8,409,645
Goal 7 Affirmatively Further Fair Housing	GOAL TOTAL		\$0
ALL FUNDS - CALIBRATION LEVEL		TOTAL	\$56,348,721

TABLE 87 is not a required table; it organizes the available funding by goal. Goals 1, 2 and 4 have comparable funding availability in PY15. These three goals combine to absorb approximately 76% of the federal funding for all housing-related programs in PY15. While Goal 4’s funding is entirely reliant on federal resources, the state will contribute 39% of Goal 1’s resources and 22% of Goal 2’s resources; however, in subsequent years, the state’s contribution to resources available for Goal 1 will likely diminish. Goal 4 and 6 rely solely on federal funding; Goal 5 is assisted through Rhode

Island Housing’s own resources. Strategies to address Goal 7 involve many of the other funding programs including rental assistance and development financing.

TABLE 88 is the required table for the eConPlan. It shows that the largest single source of federal funds for housing-related purposes is the Housing Choice Voucher Program administered through Rhode Island Housing as part of its obligations as a statewide Public Housing Authority. This program provides, on average, housing assistance payments near \$650 per month to over 1,500 households in the state, over 90% of which are either very low income or extremely low income households. TABLE 88 also shows that the total available funds to achieve the state goals in PY15 is over \$56 million, and over \$59 million when including program income and prior-year resources available from CPD programs. Federal funding accounts for approximately \$46 million (79%) of available funds in PY15, and contributes to part of all goals for which funding is available.

Anticipated Resources

TABLE 88 – ANTICIPATED RESOURCES – ECONPLAN TEMPLATE TABLE

Program	Source of Funds	Expected Amount Available Year 1			
		Annual Allocation \$	Program Income \$	Prior Year Resources:	Total \$
HOME	Public-federal	\$3,002,167	\$18,016	\$2,117,347	\$5,137,530
HOPWA	Public-federal	\$685,495	\$0	\$6,000	\$691,495
CDBG	Public-federal	\$4,915,519	\$122,062	\$778,742	\$5,816,323
CDBG - DR	Public-federal	\$7,100,000	\$0	\$0	\$7,100,000
ESG - State	Public-federal	\$668,699	\$0	\$0	\$668,699
ESG - Entitlements	Public-federal	\$718,236	\$0	\$0	\$718,236
Title XX - Social Services Block Grant	Public-federal	\$1,272,385	\$0	\$0	\$1,272,385
Continuum of Care (former SHP & S+C)	Public-federal	\$5,262,197	\$0	\$0	\$5,262,197
Low Income Housing Tax Credits	Public-federal	\$3,880,000	\$0	\$0	\$3,880,000
Housing Choice Voucher Program	Public-federal	\$14,125,665	\$0	\$0	\$14,125,665
Lead Hazard Reduction Program Grant	Public-federal	\$766,667	\$0	\$0	\$766,667
Healthy Homes Grant	Public-federal	\$66,667	\$0	\$0	\$66,667
NFMC - NeighborWorks Grant	Public-federal	\$336,614	\$0	\$0	\$336,614
HUD 811 Project Rental Assistance	Public-federal	\$110,911	\$0	\$0	\$110,911
HRC Homelessness Funding	Public-state	\$1,662,500	\$0	\$0	\$1,662,500
Building Homes Rhode Island	Public-state	\$5,800,000	\$0	\$0	\$5,800,000
State Lead Hazard Reduction Funding	Public-state	\$600,000	\$0	\$0	\$600,000
Thresholds Program	Public-state	\$1,000,000	\$0	\$0	\$1,000,000
State Rental Assistance - Hmless	Public-state	\$750,000	\$0	\$0	\$750,000
Neighborhood Opportunities Program*	Private	\$1,300,000	\$0	\$0	\$1,300,000
RoadHome	Private	\$2,325,000	\$0	\$0	\$2,325,000
TOTALS		\$56,348,721	\$140,077	\$2,902,089	\$59,390,888

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

State HOME Program

Historically, the state’s HOME program for non-entitlement communities, which has received nearly \$100 million since 1992 to develop affordable rental and homeownership opportunities in the state, has leveraged \$6.39 for every \$1 of HOME funds spent on rental activities (as of year-end 2014).

This leverage ratio is the 11th highest nationally among 51 state participating jurisdictions, though it is technically in a tie for 1st among 27 states that qualify as producing ‘significant leveraging’ as a result of a historical 4 to 1 ratio or better. Also, this leveraging score of 6.39 is considerably higher than the national average of 4.84.

HOME applications receive extra points in scoring when proposed projects have other sources of public and private funds committed. No federal funds are counted as match, only state and private funds are considered. Sources contributing to the development of HOME-assisted projects include: market rate bank financing, private foundation grants, private donations, Building Homes RI, Lead Hazard Reduction funds allocated from the state, Thresholds Program funds, Community Development Block Grant funds, Affordable Housing Program funds (Federal Home Loan Bank of Boston) and sales proceeds (Homeownership projects).

Analysis of the past five years of Rhode Island’s HOME commitments showed approximately \$16.5 million in HOME funds awarded that included over \$165 million in addition non-federal and private funding, again a \$10:\$1 ratio. In the upcoming planning period this 10 to 1 ratio is likely to be replicated due to the sustained high levels of total development costs and the limited other federal capital subsidies for affordable housing development, which will also continue to far exceed match requirements.

ESG Match

Due to the unique collaboration of the Consolidated Homeless Fund, the CHF Partnership is able to provide 100% matching funds without transferring match responsibility to the ESG sub-recipients. Non-CPD funds that are leveraged through ESG funding of the CHF include the state’s homelessness funding through the HRC, the CDBG set-aside for homeless shelter operations, and Social Service Block Grant funds (passed through to the HRC from the state’s Dept. of Human Services).

In PY15, the state’s ESG formula allocation will only make up 14% of the funding for the Consolidated Homeless Fund, 26% coming from other CPD funds (state and entitlements combined), another 26% coming from non-CPD federal funds (Social Services Block Grant), and the rest (34%) coming from the state’s Homelessness funding.

Private financing in the development of affordable housing (meeting Goal 1)

From 2010 to 2014, of the approximately \$570 million in total development costs of all affordable housing development, 82% came from private funding, either from a private organization or through the investment of equity in tax credit financed developments. Of the balance of total development cost, 10% came from federal capital subsidies while the remaining 8% came from state and local capital subsidies.

In Program Year 2015, it is likely that private funding will contribute a slightly larger share of total development cost than in the average program year from the previous planning period. Analysis of likely funding shows that 7% will likely come from federal subsidies and another 7% from state and local subsidies – the remaining 86% of total development cost will come from Low Income Housing Tax Credit equity and other non-subsidized investments from private organizations or private funding utilized by public agencies. The heavier reliance on non-federal subsidies means a reduced reliance on tax payer funding to achieve state goals, but also reflects overall reductions in federal

sources for developing affordable housing, and thus a lower overall production of affordable units. With state bond (BHRI) funds from previous funding rounds to be utilized in projects finally closing in 2015, the state is likely to finance projects in PY15 with a total development cost near \$94 million. While this is a significant amount of investment that will produce substantial outcomes, this amount represents 14% less than the average total development cost emanating from similar sources from 2010 to 2014.

AP-20 Annual Goals and Objectives – Additional Narrative

TABLE 89 – GOALS AND OBJECTIVES YEAR 1

<i>Program Year 2015 (Year One of 2015-2019 Planning Period) Summary of Funding and Outcomes by Goal</i>			
Goal 1 - Develop and Preserve Affordable Housing	PY15	Outcome	
HOME Investment Partnership Program	3,002,167	Rental units constructed	76
9% Housing Tax Credit	2,680,000	Rental units rehabilitated	540
Community Development Block Grant - 25% setaside to AH	1,228,880	Homeowner Housing Added	13
Building Homes Rhode Island	5,800,000	Homeowner Housing Rehabilitated	6
Housing Trust Fund - HERA 2008	0	Housing for Homeless added	28
4% Housing Tax Credit	1,200,000	Rental Housing Added - DR	0
CDBG -DR Housing Stabilization Program	893,890	Rental Housing Rehabilitated - DR	60
TOTAL	14,804,937		
Goal 2 - End Homelessness	PY15	Outcome	PY15
State Rental Assistance	750,000	Other - PSH Households Assisted	1,294
Emergency Solutions Grants Program - Entitlement communities	718,236	Rapid Re-Housing - Households	192
Emergency Solutions Grants Program - Statewide	668,699	Shelter - Persons	3,171
Social Service Block Grant, Title XX	1,272,385	Shelter Beds Added	35
RI Homelessness Funding	1,662,500	Homelessness Prevented - Persons	6
CDBG Homeless Setaside	500,000	HIV AIDS Housing Ops	48
Supportive Housing Program - Continuum of Care	5,262,197	VLI Household Rent Support (NOP)	182
HUD Section 811 Project-Based Rental Assistance (\$5.2 mill over 8 yrs)	110,911		
RoadHome Service Enriched Rental Assistance Program	2,325,000		
HOPWA	685,495		
Neighborhood Opportunities Program*	1,300,000		
Thresholds	1,000,000		
TOTAL	16,255,423		
Goal 3 - Healthy Homes	PY15	Outcome	PY15
State Lead Program	600,000	Home Health Hazards Remediated	110
HUD Lead Hazard Reduction Program	766,667	Rental units rehabilitated	98
HUD Healthy Homes funding	66,667	HO Housing Rehabilitated	161
CDBG Home Repair Program	983,104		
TOTAL	2,416,437		
Goal 4 - TBRA to Low Income Hseholds	PY15	Outcome	PY15
Housing Choice Voucher Program (Section 8)	14,125,665	Tenant-Based Rental Assistance	1,600
Goal 5 - Address Foreclosure Crisis	PY15	Outcome	PY15
NFMC Round 7 NeighborWorks Grant	336,614	Homeowners Assisted	579
Goal 6 - Non-Housing Community Development	PY15	Outcome	PY15
CDBG - Balance of funds (not housing or homeless setaside)	2,203,535	Public Facilty/Imprvmnt - Persons	35,000
CDBG-DR - Balance of Funds (not housing stabilization)	6,206,110	Public Services - Persons	30,000
TOTAL	8,409,645	Public Facilty/Imprvmnt DR - Persons	100,000
TOTALS	56,348,721		

Goals Summary Information

TABLE 79 of the Strategic Plan introduces the seven goals of this Consolidated Plan, while TABLES 80-85 described the anticipated annual outcomes by goal. TABLE 89 summarizes the funds available by

goal and the proposed outcomes as previously related in the aforementioned tables from the Strategic Plan. Program Year 1 funding for Goals 1 through 6 include an estimated \$56.3 million in funding from all sources. Of the estimated total, \$8,586,385 (15%) will come from HUD CPD programs state-level formula allocations (HOME, ESG and CDBG), \$718,236 will come from HUD CPD programs entitlement community-level formula allocations (Entitlement-ESG commitments to Consolidated Homeless Fund) and another \$685,495 will come from HUD CPD programs in the form of a competitive grant applied for by Rhode Island Housing (HOPWA). Additionally, \$7.1 million will come from the HUD CPD supplemental program CDBG – Disaster Recovery funds. Other HUD funds to support Rhode Island’s housing and homelessness goals in Program Year 15 include competitively-awarded sources from the HUD Office of Special Needs Assistance Programs (SNAPS) – through the Continuum of Care programs, the Office of Lead Hazard Control and Healthy Homes (OLHCHH) – through HUD Lead Hazard and Healthy Homes funding and the Office of Public and Indian Housing (PIH) – through the Housing Choice Voucher Program. Other federal, state and private financing supports these initiatives to achieve the proposed outcomes. Goal 7, Affirmatively Furthering Fair Housing, does not have an outcome attributable to the number of persons, business or households served. Strategies to address Goal 7 involve many of the other funding programs including rental assistance and development financing.

AP-40 Section 108 Loan Guarantee – Additional Narrative

Rhode Island Section 108 Loan Guarantee Program

The Office of Housing and Community Development recognizes that non-entitlement communities find it difficult to access large scale funding for specific economic and housing development activities. The National Affordable Housing Act of 1990 amended Section 108 of the Housing and Community Development Act to enable non-entitlement communities to apply to the State and to HUD to finance revenue producing activities that meet the accepted CDBG national objectives and eligibility criteria.

The State of Rhode Island will pledge up to \$25 million of future CDBG allocation in support of eligible activities.

Eligible Activities

Guaranteed loan funds may be used for the following activities, provided that said activities are designed to produce revenue.

1. Acquisition of improved or unimproved real property in fee or by long-term lease, including acquisition for economic development activities.
2. Rehabilitation of real property owned or acquired by the entity applicant, city or town or its designated public agency.
3. Payment of interest on obligations guaranteed under the 108 program.
4. Relocation payments and other relocation assistance.

5. Clearance, demolition and removal, including movement of structures to other sites, or building and improvements on real property acquired or rehabilitated pursuant to numbers 1 and 2 above.
6. Site preparation, including construction, reconstruction or installation of public improvements, utilities or facilities (other than buildings) related to the redevelopment or use of the real property acquired or rehabilitated pursuant to paragraphs and above.
7. Payment of issuance, underwriting, servicing and other costs associated with private sector financing of notes or other obligation guaranteed under this subpart.
8. Economic development programs including acquisition, construction, reconstruction, rehabilitation or installation of commercial or industrial buildings, structures or other real property, equipment and improvements. Assistance may be provided to private-for-profit, and private or public nonprofit sub-recipients where assistance is appropriate to carry-out the economic development activity.
9. Acquisition, construction, reconstruction, rehabilitation, or installation of public facilities (except for buildings for the general conduct of government), site improvements, and utilities, for an economic development purpose.
10. A debt service reserve in accordance with requirements.

National Objectives

- Activities must be designed to comply with one of the following national objectives.
- Benefit to low and moderate income families and individuals or, aid in the prevention or elimination of slums and blight
- Applicants are reminded that the state is committed by HUD requirements to fund activities that provide a 70% benefit to low and moderate income persons.

Application Period and Grant Limitations

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

Evaluation Criteria

Successful applicants will receive project money from HUD, but the repayment of those funds is guaranteed by State CDBG. The state pledges that future CDBG grant monies will repay the federal government should a non-entitlement recipient of a Section 108 Loan guarantee default. Because of this provision the state will develop an application that provides for stringent review with the following criteria:

- Clear definition of the project goals and activities.
- Effective and capable local management.
- Analysis of secondary economic and fiscal impacts.
- Revenue projections and firm financial information on the proposed project.
- Total housing units developed for permanent affordable housing.
- Percent of low/moderate jobs created over the fifty-one percent National Objective minimum.
- Percent of jobs to be documented as "taken by" low/moderate income persons.

- Ratio of loan guarantee dollars to the number of low/moderate income persons.
- Percent of permanent affordable housing units developed over the fifty-one percent national objective minimum.
- Ratio of loan guarantee dollars to permanent affordable units developed.
- Leverage of non-government funding
- Extent of Consolidated Plan/CHAS/local Affordable Housing Plan consistency.

The state will grant special consideration and encourage applicants that:

- Are located in or directly benefit the state and federal enterprise zones.
- Are part of the comprehensive community or neighborhood revitalization program.
- Provide for linkages between housing development and supportive services.

Risk Management and Controls

(Note: For terms longer than 10 years, or where in any one year the 108 payment exceeds the annual State CDBG entitlement, HUD will also exert itself into project underwriting.)

- The local jurisdiction will complete its own underwriting/analysis of each project with recommendation for approval to the state and be accompanied by the chief elected official's signed certification required by HUD.
- The State shall complete its underwriting of the project and shall require: quality collateral/security reasonably consistent with conventional lending practices for similar project with respect to loan to value (LTV) ratios. After project stabilization and a good payment history, collateral can be reduced by the applicants request and State and Local approval.
- The City or Town and State must conclude that the project is likely to...a) produce both the National Objective and forecasted public benefits and b) evidence that the net operating income will be sufficient to meet debt service.
- Under certain circumstances where overwhelming public benefits are forecasted the State and locality can mutually decide to accept.
 - impaired collateral
 - reduced interest rates
 - poor cash flow and/or credit risks
- Provided, however, that the state and locality can mutually agree to financial sanctions against the local jurisdiction relative to the future CDBG applicants/foregoing funding in event of default or missed payment(s) by the recipient.

Outcome Measures

In accordance with Federal Register Notice dated March 7, 2006, every activity funded will be designated a minimum of one projected outcome measure. Compliance with this measurement must be tracked by the local recipient.

Every activity will have a designated "general objective category". The choices are 1) Decent Housing, 2) Suitable Living Environment, and 3) Economic Opportunity. Every category will have a designed "general outcome category". The choices are 1) availability/accessibility, 2) affordability, and 3) sustainability.

The State will preliminarily designate the follow measures for certain classes of activity (examples shown below). If a community feels an alternative measure is more appropriate, it must return justification for its assertion along with its annual contract agreement.

- Housing Rehabilitation:
 - Decent Housing - Availability/Accessibility
- Affordable housing projects/developments:
 - Decent Housing - Affordability
- Neighborhood Revitalization/Facilities:
 - Suitable Living Environment - Availability/Sustainability
- Services:
 - Dependent upon nature of services.
- Job Creation Activities:
 - Economic Opportunity – Availability

AP-85 Other Actions – Additional Narrative

Actions planned to address obstacles to meeting underserved needs

The state identifies the following as underserved populations that will be the subject of targeted interventions to provide more housing opportunities and serves that prevent homelessness. Successes regarding the actions outlined here will be described in each program year’s CAPER.

Youth aging out of foster care

Per Foster Forward, Rhode Island’s leading advocacy and programming organization for youth aging out of foster care, “on or shortly after their 18th birthday, young people in the Rhode Island foster care system lose their foster care benefits. It’s called “aging out,” and it affects over one hundred young adults each year.”

The R.I. Department of Children, Youth & Families (DCYF) is the principal agency charged with ensuring that youth aging out of foster care do not become homeless and that families are sustainably housed prior to reunification. A DCYF representative co-chairs the Family & Youth subcommittee of the Continuum of Care along with the Foster Forward and R.I. Kids Count. The subcommittee is responsible for carrying out the state objective to end homelessness among families, children and youth within 10 years. The Rhode Island Council of Resource Providers (RICORP), the Ocean State Network and its multiple provider partners, Child and Family Services of Newport and its multiple partners, Rhode Island Housing, the RI Coalition for the Homeless, PICA, and the House of Hope are all represented on the committee and take an active role in ensuring homeless youth are housed in sustainable settings and families have supports necessary to remain stably housed.

There are 247 individuals enrolled in YESS (Youth Establishing Self-Sufficiency Aftercare Program) with no dedicated housing for this population. YESS provides individualized, youth-driven services

and supports to young adults, ages 18-21, who have been closed to the state's Family Court and DCYF. RI Foster Parents Association, PCDC and Ferland Property Management will all work to ensure that this housing answers the need for the target population.

In 2014, work was completed on Linden Tree Place in Central Falls, developed by Pawtucket Central Falls Development Corporation, with services provided by Foster Forward and RICORP. Five rental units were completed which will serve up to 11 youth aging out of foster care at any given time. This was the first development of its kind in Rhode Island, with regards to the targeting of the 'aging out' population of youth, long determined to be at risk of homelessness, and providing services and case management specific to their needs through strategic partnerships. The state will rely on this development as a model of success to advocate for similar work.

De-institutionalized elderly and disabled

Past actions that will continue in upcoming planning period and first program year

The state has implemented many programs and policies intended to reduce reliance on state hospitals or nursing homes through the deinstitutionalization and diversion of people who could be well served by less restrictive living environments, including in the community with long term care services. Some examples of which include:

a. The Office of Mental Health Advocate

The Office of the Mental Health Advocate was created in 1975 when the legislature re-wrote and reformed the Mental Health Law of Rhode Island. This reform was part of a national movement toward deinstitutionalization of mentally ill individuals, a movement which began in the 1950's and became a centerpiece of public policy in the 1970's after the United States Supreme Court declared that all states must provide Constitutional Due Process and legal counsel to individuals subjected to involuntary hospitalization.

b. Rhode Island Community Medication Assistance Program

The Rhode Island Community Medication Assistance Program (CMAP) provides psychotropic/addiction medications to community clients who require them in order to avoid psychiatric hospitalization or substance abuse detoxification but who cannot afford them. The program originated when the cost of medication was identified as a stumbling block in the process of deinstitutionalization of the State hospital in Rhode Island over 25 years ago.

c. Parent Deinstitutionalization Subsidy Aid program

The Rhode Island Legislature, pursuant to R.I.G.L. 40.1-1-10.1 as amended, established the Parent Deinstitutionalization Subsidy Aid program in 1978 within the Department of Mental Health, Retardation and Hospitals (MHRH), now BHDDH.

This subsidy program makes available care, treatment and training to eligible individuals in family homes rather than in public institutions. The subsidy program thereby furthers the provision of home and community-based care, treatment, and training to eligible individuals. A series of

amendments has broadened eligibility to include individuals in other public institutions as well as certain individuals who have not been institutionalized.

The subsidy program seeks to assist both children and adults who experience a mental or physical condition of sufficient severity to cause them to be admitted to a State institution if there were not a specialized community program available.

In 2013, the General Assembly, as a provision to this law, directed BHDDH to develop options, fiscal impact analysis, and recommendations for the expansion of shared living services to siblings of individuals with developmental disabilities who are no longer able to be cared for at home by aging parents.

Recent actions to commence effect in first program year

a. Continuum of Care, Chronically Homeless/High Need Individuals Committee

This new committee, which replaces the previous Health and Housing Stability Committee, was developed as part of the new Rhode Island Continuum of Care Governance Charter to take effect in this first program year. The committee will use a case management approach using a service priority assessment to house chronically homeless/high need individuals, including but not limited to those that meet the HUD definition of chronically homeless, formerly incarcerated individuals, and high users of Medicaid in the most appropriate housing program. The committee will also help identify housing programs to meet the unique needs of the household, and inform policy makers about policies which create barriers to successful placement.

b. Money Follows the Person program, also known as Rhode to Home

Rhode Island will transition eligible individuals who are in a qualified institutional setting for 90 days or more into a qualified community-based residence. At the end of the demonstration period a total of 520 Phase I Medicaid beneficiaries will be transitioned into the community. The demonstration will use a coordinated system of care to assist a participant transition into and to successfully remain in the community, with the appropriate supports, so that they can experience more independence and a better quality of life. Participation in the demonstration will be strictly voluntary and participants will receive information about long-term care options so that they can make an informed decision. The Rhode to Home is designed as a person-centered system, where the participant and his/her family/guardian are involved in all stages of the assessment, plan development and care delivery processes.

The RI Global Consumer Choice Waiver (1115 Waiver) approved by the federal Department of Health and Human Services, Centers for Medicare and Medicaid and Services (CMS), provides flexibility to transform the State's Medicaid program and the long-term care (LTC) system. The Money Follows the Person (MFP) grant will help the State meet one of the primary goals of the 1115 Waiver which is to rebalance State expenditures from institutional settings to a home and community based setting.

- c. HUD 811 Project Rental Assistance (*see AP-85, enhance coordination between housing and social service agencies*)

The re-entry of discharged prisoners into community settings

Facilitating the re-entry for persons leaving prison is a goal of Opening Doors Rhode Island, and is thus a shared goal of this Consolidated Plan. Each subsequent year of this planning period, the state will provide updates on achievements relating to the provision of housing opportunities and the prevention or ending of homelessness for this population.

Preventing homelessness

Most of the work for re-entry is conducted through the local re-entry councils of which probation and parole staff takes the lead in creating. Homeless provider agencies and homelessness advocates participate to create the linkage between the discharge plans and the support systems in the community. They also report on-going housing issues of the re-entry population to the Chronically Homeless/High Need Individuals Committee of the Continuum of Care. Most persons are discharged to their families in temporary situations, so DOC discharge planners ensure that the person has access to all the local information related to housing, community programs and networking activities related to housing. They work with housing outreach workers to locate affordable housing and the SOAR program to access SSI and SSDI. Targeting this population within DOC facilities helps divert many at-risk prisoners from homelessness upon release or shortly thereafter.

Since early 2008, the state's BHDDH has operated the Transition from Prison to Community Program (TPCP), in conjunction with the Department of Corrections (DOC), the Rhode Island Parole Board. The program's substance abuse treatment providers have been working closely to assist in the transition of inmates back into their communities by providing/coordinating substance abuse services to those individuals who are eligible for parole and in need of services upon their release from the ACI. The Rhode Island Adult Drug Court has been in existence for about 11 years. Its purpose is to improve the quality of participant's lives in a timely and effective manner through substance abuse treatment, social services, and justice interventions, to help reduce the incidence of substance abuse among participants and decrease their involvement in the criminal justice system.

Providing housing opportunities

Committing funds to developments that propose to house and provide services to ex-offenders and inmates has not been high priority for Rhode Island's affordable housing programs, as simply too many other populations in need have received more focus, which is a reason why this population is currently determined to be underserved.

In April of 2015, approval was given to sell a property formerly used as supportive housing to Community Resources for Justice ("CRJ"), to develop a Residential Reentry Center on the site in Pawtucket for Rhode Island residents returning from federal prison. CRJ stated that they would provide a safe, structured, supervised environment and offer housing, employment, finances,

counseling and treatment for mental and addiction issues. The project will require no subsidy financing for acquisition, redevelopment or operations. Fourteen full-time jobs will be created, and it will be the first facility of its type in Rhode Island. The proposal for this project was reviewed by a committee composed of Rhode Island Housing, Rhode Island BHDDH, Rhode Island DOA, and Rhode Island's Local Initiatives Support Corporation (LISC).

Actions planned to reduce the number of poverty-level families

Family Self Sufficiency program

The Family Self-Sufficiency program, as the name suggests, does more than just provide rental assistance, but works with renters to develop escrow accounts in order to save to become homeowners. Rhode Island Housing runs a voluntary FSS program through its authority as a PHA, and receives approximately \$180,000 per year to support three full-time FSS coordinators. The program is currently at 93% capacity in terms of actual enrollment and maximum enrollment allowed; 62% of participating families have escrow account balances and several families are participating in educational programs with the intent of becoming homeowners. In 2014, 15 families graduated from Rhode Island Housing's FSS program and over \$90,000 was disbursed from FSS escrow accounts for homeownership investments. Based on current enrollment in the HCV Homeownership Program, the state expects another 12 graduates in 2015. RIH conducts outreach to all HCVP participants to participate in the Homeownership program by holding quarterly presentations in which all tenants are invited to attend; RIH also provides support to other PHAs in increasing participation in Homeownership programs throughout the state.

Anti-Poverty programs, summary and first program year new actions

The state, through its social service agencies, pays for or sponsors many anti-poverty programs for families, such as:

Rhode Island Works Program: The RI Works Program provides cash assistance to families with children up to age 18 and work readiness services for enrolled parents. RI Works is the state's version of providing temporary assistance for needy families.

The **Earned Income Tax Credit** provides a tax credit and/or refund to people who earn low to moderate wages. The payment can be received as part of the end-of-year tax filing and a portion can be received in the worker's weekly paycheck. Workers who qualify for the federal EITC also qualify for a state EITC which is a portion of the federal amount.

Action in PY15

Legislation was introduced in early 2015 to reverse a recent change to the state's EITC. Rhode Island's credit is currently 25 percent of the federal credit, but only the first 15 percent is actually refundable for tax year 2014. However, the General Assembly approved a change last year that will reduce the credit to 10 percent in the 2015 tax year, but make it fully refundable. The proposal, introduced by Senator Gayle Goldin, would increase the credit to 20 percent of the federal credit

while maintaining its fully refundable status beginning in tax year 2016. According to a press release covering the legislation proposal, “There are more than 80,000 tax filers in Rhode Island who claim the credit. Senator Goldin’s proposal would result in the lowest-earning 20 percent of filers – who make an average of \$11,000 annually – seeing an extra \$167 as a result of the change. For those in the next-to-lowest 20-percent bracket, those earning the average \$27,000 would receive an extra \$344. The middle 20 percent of Rhode Islanders earning an average of \$48,000 would get an average of \$137 more.”

Property Tax Relief Circuit Breaker Program: State-funded tax credit to senior and disabled homeowners and renters whose property taxes exceed between 3% and 6% of their household income. For renters, property tax is calculated at 20% of annual rent. The maximum credit is \$300.

HealthSource RI – Affordable Health Coverage: HealthSource RI is the state’s new health insurance marketplace for Rhode Islanders, in which families and individuals with income below 400% of the federal poverty level (“FPL”) may be eligible for a tax credit from the federal government to help pay for enrolling in a health plan. **Rite Care** and **Rite Share**, which provide comprehensive medical coverage through the Medical Assistance Program to pregnant women, children and their parents or caretaker relatives, are now options, under HealthSource RI, with eligibility dependent on income.

New proposals for the state’s **Governor’s Workforce Board** (“GWB”) include increased opportunities for apprenticeships and the “work immersion program” which would provide subsidies to employers to hire unemployed adults and post-secondary school students on a short term basis with the hope that this will lead to a full-time job. Subsidized employment has been used by many states to help link out of work residents to available jobs.

The **Rhode Island Department of Labor and Training** has a Workforce Development Services Division (“WDSD”), which describes itself as “the single point of contact in Rhode Island for employment, workforce information and education and training services. WDSD oversees all programs that guide jobseekers to suitable employment and facilitates the connection between employers and qualified workers.

Address Negative Effects of Foreclosure Crisis

The need for ongoing foreclosure counseling and mitigation is still great, as shown by the state’s 2nd highest national 90+ day delinquent rate and a stubbornly high negative equity rate, and the state will find other ways to support the successful counseling efforts provided since the crisis began. The Rhode Island Housing Help Center will continue to field requests for counseling services, with many of these householders receiving in-person counseling, which is funded by national foreclosure mediation grant funding, state funds provided through the mortgage crisis settlement and Rhode Island Housing’s own funds. RIH’s Help Center will also continue its foreclosure mediation role, which brings together the homeowner, their counselor and the servicer to participate in a good faith effort to work out the challenges facing the borrower. These services will help the state achieve Goal 5 of the Consolidated Plan and will likely serve nearly 600

households with in-person counseling and mediation services, while fielding close to 2,000 calls to the HelpCenter.

Actions planned to develop institutional structure

The coordination of State, Federal, and private resources will improve access to housing and community development resources and the targeting of these resources to high priority areas and initiatives. Rhode Island will continue to analyze the delivery system of affordable housing to identify areas of problem and issues. Recommendations continue to be made on how to improve the administration of programs by State agencies. Closer communication ties among agencies with housing programs are also being pursued to improve program coordination. Periodic meetings of the State agencies improve the coordination of current funding programs as well as implementation of new housing policies and programs.

Coordinated Access System

As part of conformance to the 2009 HEARTH Act, the state will require participation in the new Coordinated Access System for all Receiving Programs funded by ESG, the RI CoC, RoadHome, State Consolidated Homeless Fund, and State Rental Assistance. Require that participating programs adhere to the Policies and Procedures for the Statewide Coordinated Access System. The Rhode Island Continuum of Care designed the Statewide Coordinated Access System (“CAS”) to coordinate and strengthen access to diversion, housing and shelter services for families and individuals who are homeless or at risk of homelessness throughout the state of Rhode Island.

The Statewide CAS institutes consistent and uniform assessment and referral processes to determine and secure the most appropriate response to each individual or family’s immediate and long-term housing needs. the Statewide CAS includes: A uniform and standard assessment process to be used for all those seeking homeless assistance and procedures for determining the appropriate next level of assistance to resolve the homelessness of those admitted to shelter or other temporary housing accommodations; Establishment of uniform guidelines among components of homeless assistance (shelter, transitional housing, rapid rehousing, and permanent supportive housing) regarding: eligibility for services, priority populations to be served, expected outcomes and targets for length of stay; Agreed upon priorities for accessing homeless assistance; Referral policies and procedures from the system of coordinated access to homeless services providers to facilitate access to services; and a policies and procedure manual detailing the operations of CAS.

Initial use of the CAS began in December of 2014, the results of which are described in NA-40 of the Consolidated Plan. The system focuses on the use of a Vulnerability Index to help administrating entities with the intake of households facing a housing crisis, with the subsequent use of a Service Prioritization Decision Assistance Tool to determine placement decisions.

Other institutional structure improvements planned

SP-40 describes some other institutional structure gaps within the Continuum of Care besides these housing stability concerns, which will be implementing new methods of connecting residents relying for long periods of time on permanent supportive housing into more mainstream living situations, subsidized or not, many of which will take effect in the first program year: the Continuum of Care will be requiring new case conferencing procedures to create actionable transition plans for moving a client who is not succeeding in one housing program to move to another; encourage the employment of formerly homeless individuals to assist in connecting newly housing homeless persons to community supports; creation of the Employment First Program by BHDDH, adopted by the Office of Rehabilitation Services and the Rhode Island Department of Education, which will impact the populations housed in permanent supportive housing by identifying supportive companies and providing the necessary services to maintain a job; and increasing training of project staff in accessing the Rhode Island Health Exchange to increase the number of non-disabled receiving health insurance.

Actions planned to enhance coordination between public and private housing and social service agencies

HUD Section 811 Project Rental Assistance Program

Rhode Island Housing (RIH), the Executive Office of Health and Human Services (EOHHS), and the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) will build on their strong history of collaboration and the Rhode Island's strong infrastructure and supportive service system to operationalize the HUD Section 811 PRA Program in Rhode Island.

Systems change associated with implementation of the PRA will result in seamless communications between EOHHS, BHDDH and RIH; increased placement of disabled individuals in integrated community-based settings; and greater oversight of the provision and expansion of quality housing and services.

The effects of this system change will be measured by:

- The decreased number of disabled individuals on waitlists
- The increased number of disabled individuals who are placed in integrated community-based settings
- Improved housing retention (fewer evictions and abandoned apartments)
- Increased housing stability (fewer hospitalizations/emergency room visits, less interfacing with law enforcement, fewer tenant landlord disputes)
- Shorter length of stays in institutions
- Fewer re-admissions to institutions

RIH, EOHHS and BHDDH intend for the proposed PRA program to result in improved health outcomes, reduced service costs per beneficiary (particularly amongst homeless high Medicaid users), reduced chronic homelessness statewide and increased tenant income.

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

Collaborative Green and Healthy Homes Initiative (GHHI) Project

Rhode Island Housing's LeadSafe Homes Program has a goal to complete 20 units of targeted assistance in Providence and 30 units of targeted assistance in the Blackstone Valley region of Rhode Island. A collaboration of multiple public and non-profit groups will work together to target LSHP funds to homes that need lead-remediation work completed in order for the home to receive further home health upgrades, such as structural repair or weatherization work (usually boiler replacement, insulation work or window replacement).

Currently, funding for home health improvement is fragmented across multiple funding streams that too often make homes ineligible for a certain program's funds based on another home health hazard being present. Weatherization work funded through WAP programming (federal funds awarded to CAP agencies to complete work in low-income neighborhoods) and home repair work funded through CDBG programs often find that homes with the most need were ineligible for their program because of the lead hazards associated with that work – and those funding streams were not eligible to be used for that purpose. Now these program managers have agreed to work with Rhode Island Housing to refer these households to the LeadSafe Homes Program, and that a coordinated plan would be formed if that home was found to be eligible for LSHP work. Several success stories so far from this collaboration highlight not just the inter-agency partnership's effects, but also the need for more funding to continue these efforts.

The collaboration works as follows: the LSHP team reaches out to homeowners that have received a WAP audit (but were denied WAP assistance because of lead hazards), then the LSHP team goes through the process of inspecting the home, formalizing a quote for the lead work, having the homeowner find the most reasonable approved contractor, and then inspecting the home upon completion of the project and reimbursing the contractor with LSHP funds.

After the LSHP team clears the lead work, either weatherization improvements (a new boiler and insulation replacement) or important home repairs (roof replacements, foundation repair), and sometimes both, can commence, which will already have been quoted and arranged with other program managers. Without the collaboration, many of these homes would simply be added to the 'ineligible' pile for WAP or CDBG funding in perpetuity. The project has already completed 25% of its goal of combining multiple home health improvement funding sources in one home, and will be 75% complete by the end of 2015. The Collaboration helped the Green and Healthy Homes Initiative of Rhode Island win the 2015 Collaboration Best Practices Award from the Rhode Island Foundation.

AP-90 Program Specific Requirements – Additional Narrative

Rhode Island Housing HOME Investments Partnership Program Resale Policy

The HOME rule at Section 92.254(a)(5) requires that all HOME-assisted homebuyer housing be acquired by an eligible low-income family, and the housing must be the principal residence of the family throughout the affordability period. If the home is transferred, voluntarily or otherwise, during the period of affordability, it must be made available for subsequent purchase only to a buyer whose family qualifies as low-income, and will use the property as its principal residence. The HOME resale provision must enforce these requirements as any housing assisted with HOME funds must remain affordable for the duration of the period of affordability.

Enforcement of Resale Provisions

The Rhode Island resale policy is enforced through the use of a Deed Restriction signed by the homebuyer at closing. The Deed Restriction will specify:

1. The length of the affordability period (30 years or more in all cases)
2. That the home remains the Buyer's principal residence throughout the affordability period
3. The Owner must contact Rhode Island Housing in writing if intending to sell the home prior to the end of the affordability period;

Definition of Fair Return on Investment

Rhode Island Housing defines the homeowner's investment as the total of

1. The down-payment, if any, from the homeowner's own funds applied to the purchase price of the property, and
2. The actual, documented expenditures of the homeowner for approved capital improvements to the property. Improvements shall not include landscaping or other yard improvements of interior or exterior painting or other repairs due to normal wear and tear on the property. Approved capital improvements include, but are not limited to: (a) Renovations to the property's living space and (b) The addition of a deck, porch or car garage.

Calculation of Appreciation Standard

Rhode Island Housing defines a "fair return" to include the full value of the capital investments of the original homebuyer (down-payment and improvements as defined in the previous section) as well as the market appreciation of those investments. Market appreciation shall be based on percentage changes calculated by the using the federal Housing Price Index (available at <http://www.fhfa.gov/DataTools/Downloads/Pages/House-Price-Index-Datasets.aspx>).

The down-payment relevant base month will be the month of the original purchase while the relevant base month for any and all capital improvements will be the month in which the improvements were paid for by the current owner. The percentage change in the HPI from the

month of the investment to the month of the intention to sell shall be used as the appreciation percentage on the original investment.

Example

A home with a 30-year affordability period was purchased in May of 2012 for \$166,500, with the homeowner supplying a down payment of \$3,480. The owner incurred verified and approved capital improvement expenses of \$5,000 in June of 2013. The original buyer intends to put the house on the market in March of 2014.

The relevant active month Housing Price Index (HPI) level is 189.32, with the relevant HPI of the original purchase being 176.75, producing a percentage change of 7.112%. The appreciation on the down-payment is thus 7.112% of the original down-payment itself (\$3,480), or \$247.49. The relevant HPI of the original construction investment is 182.83. The percentage change from that month to the relevant active month is 3.550%. The appreciation on the construction investment is thus 3.550% of the \$5,000 invested, or \$177.49. The total appreciation on the owner's investments is summed to be \$424.98. Added to the original combined investments of \$8,480, the fair return on investment to the homeowner upon resale is thus \$8,904.98.

Resale

The price at resale must provide the original HOME-assisted owner a fair return on investment and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers:

- Affordable to a reasonable range of low-income buyers shall mean that the principal, interest, taxes and insurance (PITI) shall not exceed 30% gross monthly income for buyers between 70% and 80% of area median income. In no circumstance can the sale price of the home exceed the maximum of that range, which is the 80% AMI sales price.
- If the fair market value of the home falls within the reasonable price range to remain affordable to low-income homebuyers, as defined in the previous paragraph, and the subsequent homeowner's income falls beneath this range, additional assistance may be provided to the subsequent homeowner in the form of down-payment assistance. The source of this assistance will be non-federal funds that are applicable for this use.
- It is important to note that in certain circumstances, such as a declining housing market where home values are depreciating or are stagnant, the original homebuyer may not receive a return on his or her investment because the home sold for less or the same price as the original purchase price.
- If net proceeds exceed the fair return on investment owed to the original homebuyer, then the original homebuyer shall be obligated the entirety of their fair return on investment amount **and** 60% of the remaining net proceeds. The other 40% of the remaining net proceeds will be returned to Rhode Island Housing's HOME account for the future development of affordable housing.