

Annual Action Plan July 1, 2019 — June 30, 2020 Draft as of July 31, 2019

CITY OF WOONSOCKET, RHODE ISLAND

Duns #06-230-8804

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Lisa Baldelli-Hunt, Mayor

The Annual Action Plan describes the collaborative process through which the City of Woonsocket identified its housing, homeless, at risk of homelessness, and community development needs and established goals, priorities and strategies for partially addressing those needs. The Plan focuses on funding from three grant resources:

- Community Development Block Grant \$1,285,344
- HOME Investment Partnership Program \$427,242
- Emergency Solutions Grant \$113,674

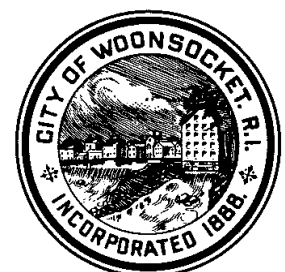


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ES-05 Executive Summary

91.220(b) Executive Summary

1. Introduction
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3. Evaluation of past performance
4. Summary of citizen participation process and consultation process
5. Summary of public comments
6. Summary of comments or views not accepted and the reasons for not accepting them

1. Introduction

Overview. The 2019/2020 Annual Action Plan (Plan) represents year five of the Consolidated Plan approved by the U. S. Department of Housing and Urban Development (HUD) on October 19, 2015. This Plan is the City of Woonsocket (City) Planning & Development Department's (WPDD) official application for HUD entitlement grants and proposes programs and services to be funded during the City's Fiscal Year (FY) 2019-2020 (July 1, 2019 - June 30, 2020). There are three sources of federal program funds in this application:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Program (HOME)
- Emergency Solutions Grant (ESG)

WPDD's primary objectives are to **increase the availability, accessibility, and affordability of decent housing (DH), suitable living environments (SL), and economic opportunity (EO) for low- and moderate-income Woonsocket residents.** The 2015-2019 Consolidated Plan funding priorities are divided into five areas designed to benefit low- and moderate-income residents:

- Neighborhood Revitalization
- Safe and Affordable Housing
- Economic Development
- Social Welfare
- End of Chronic Homelessness

The goals established during the Consolidated Planning period are as follows:

- Economic Development: Characterized by the ability of local trade and industry to create and sustain jobs
- Neighborhood Revitalization: Characterized by a healthy real estate market, attractive public amenities, a sense of safety and security, a feeling of pride and resident involvement in neighborhood concerns.
- Safe & Affordable Housing: Characterized by minimal code issues (including lead paint), decreased childhood lead poisoning, low housing cost-to-income ratios, and a range of housing choices including homeownership. This includes the following:
 - Down-payment and closing cost assistance for lower income families
 - Code-related repair and lead hazard control cost assistance for lower income Families
- End to Chronic Homelessness: Characterized by the capacity to place homeless individuals in affordable and safe housing and provide continued supportive services to prevent homelessness to those at risk. This includes the following:
 - Increased transitional housing capacity
 - Increased homeless shelter capacity
 - Increased resources for homeless prevention
- Social Welfare: Characterized by independence, self-sufficiency, and a sense of general well-being of youth, elderly, and individuals with other specific needs.

Importance of the Action Plan. In the Annual Action Plan, WPDD provides a concise summary of specific actions, activities, and programs that will take place during the upcoming program year to address the priority needs and goals identified in the Consolidated Plan. This Plan guarantees a way for HUD and the public to ensure WPDD's proper and efficient use of resources. By requiring the Action Plan, HUD not only has an opportunity to review for appropriate use of funds, but also has a benchmark document by which Woonsocket's performance can be measured.

The annual planning process provides a forum for community input into future community development activities.

The FY 2019/2020 Annual Action Plan

- Reports on the intended use of funds received by HUD from the City of Woonsocket for FY 2019
- Explains WPDD's method for distributing CDBG, HOME, and ESG funds
- Provides an opportunity for public input in the development of the annual plan

The WPDD is currently utilizing IDIS for submitting the City's Consolidated and Annual Action Plans, along with the CAPER reports that are submitted in September. Once again, for PY 2019, the City will submit electronically using IDIS. Although general information presented in IDIS is the same as in past Action Plans, the format and order of the information has changed from previous years. WPDD will strive to inform the public about the changes to the Action Plan format and to make the information as easy to understand as possible.

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

Annual Objectives. The Plan identifies programs and activities that will be used toward meeting WPDD's goals. As required by HUD, each activity is linked to one of three federal program objectives:

1. decent housing
2. suitable living environment, or
3. economic development

Each objective is matched with one of three outcome measures:

1. availability/accessibility
2. affordability, or
3. sustainability

The annual activities that will enable WPDD to achieve these outcome measures and objectives in FY 2019/2020 are listed below.

Decent Housing

2019/2020 Annual Action Plan activities, which facilitate making decent housing more available, accessible, affordable, and sustainable, include:

- Down-payment assistance to increase low- and moderate-income persons' access to homeownership
- Single family and multi-family home repair to preserve existing housing stock
- Lead-based paint testing and control activities
- Homelessness prevention

Suitable Living Environment

2019/2020 Annual Action Plan activities, which help make suitable living environments more available, accessible, affordable, and sustainable for low- and moderate-income residents will include:

- Building/rehabilitating neighborhood facilities
- Code enforcement
- Juvenile, youth, and childcare programs
- Supportive and transitional housing
- Support services for special needs populations (e.g. elderly, disabled)
- Services for the homeless and those at risk of homelessness

Economic Development/Opportunities

2019/2020 Annual Action Plan activities, which help increase access to economic opportunity for low- and moderate-income communities, will include:

- Small business loans that create jobs for low- and moderate-income persons
- Grants to micro-enterprises that help low and moderate-income business owners
- Commercial Façade Rehab program to assist commercial property owners

3. Evaluation of past performance

Past Performance. Each year WPDD submits a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD. This report serves as a description of how funding was expended during the last program year and uses the Action Plan as a benchmark document in which performance can be measured. Major accomplishments completed during the most recent completed program year, FY 2017/2018 (July 1, 2017 to June 30, 2018), are listed below. On December 19, 2018, HUD wrote to the City and stated that as a result of their review of the FY 2017 CAPER, they “determined that the City of Woonsocket has carried out its activities and certifications in a timely manner, consistent with the requirements and primary objective of the Housing and Community Development Act of 1974, as amended, and with other applicable laws and program requirements. ...we find that the City of Woonsocket has the continuing capacity to carry out its activities in a timely manner.”

Decent Housing

- Completed 12 renovated income-restricted affordable rental units
- Provided 3 homeowners with down payment assistance (5 are pending)
- In 2012, the RI Housing Resources Commission (HRC) and the state’s Interagency Council on Homelessness adopted Opening Doors RI, the state’s new plan to end homelessness. This plan is modeled on the Federal Plan and envisions ending chronic homelessness and homelessness among veterans in five years; and family homelessness in ten years. Implementing the strategies laid out in the plan, including the production of more than 700 new permanent supportive homes and deeply subsidized apartments, is a priority for the state. In 2013 the General Assembly included in the FY14 Budget a much-needed allocation of \$750,000 for rental vouchers to help implement the Plan. Unfortunately at the same time at the federal level sequestration put 526 housing vouchers at risk. Woonsocket, in partnership with the cities of Pawtucket and Providence, and the State of RI, acknowledge the issue of homelessness as a statewide concern and approach it as such. Federal and state resources are collectively assessed and allocated in cooperative agreement with the Consolidate Homeless Fund (CHF) partners: Pawtucket, Providence, Woonsocket, and the State.

Suitable Living Environment

- Served 240 youth through enrichment and achievement programs
- Provided meals and transportation to 1,200 elderly persons (individuals per program year)
- Improved the facades of one commercial buildings through Commercial Rehab Program
- Purchased firefighting equipment
- Conducted 1200 code enforcement re-inspections, issued 420 new violation notices and 45 Certificates of Occupancy, answered 250 housing and public nuisance complaints in support of neighborhood integrity/stabilization.
- Served 140 adults and children with non-residential homeless services and homeless prevention residential services.

Economic Opportunity

- Provided job training and enrichment activities for 30 people.
- Awarded a Small Business Loan to 1 Business

Overall Program Benefit. As stated in HUD's IDIS Report PR26, the City expended over 70% (100%) of its CDBG funds in FY 2018/2019 for activities which principally benefit low- and moderate income persons. The expectation for FYs 2018/2019 and 2019/2020 are expected to be similar. The expectation is to exceed the 70% minimum required for overall LMI program benefit.

Overall Program Progress. HUD's timeliness standard is that 60 days before the end of the program year, a grantee must not have more than 1.50 times the entitlement grant funds for its current program year available in its line of credit. In June of 2019 (PY 2018), the City will meet the requirement of the 60-day test and the timeliness ratio will be within the HUD allowable ratios. For FY 2019-2020, The City is looking to improve its performance level in meeting the May 2 deadline.

OneCPD Initiative. In November 2011, HUD Assistant Secretary Mercedes Marquez announced a collaborate partnership to enhance the City's housing and community development activities. This joint technical assistance and capacity-building engagement combines knowledge and resources to maximize the use of federal funds to revitalize neighborhoods, help the homeless, and produce more affordable housing. In January 2013, HUD Headquarters approved a second phase of OneCPD Technical Assistance to assist in a variety of areas such as down-payment assistance and economic development.

Ultimately, the OneCPD model will develop capacity and address technical assistance issues in a truly place-based manner that is tailored to local market conditions, rather than conforming to a one-size-fits-all approach. In the process, OneCPD promotes innovation in communities across the country and fosters replication of what works.

HUD offers planning tools to support place-based decision-making and promote public participation and transparency in the discussion over where federal investments ought to be made. The eCon Planning Suite is comprised of three components: an expanded planning database; a powerful new mapping tool, CPD Maps; and an electronic template for submitting the Consolidated Plan, the Consolidated Plan template in IDIS.

4. Summary of citizen participation process and consultation process

The Department of Planning & Development (WPDD) is responsible for producing the FY 2019/2020 Annual Action Plan. In this capacity, WPDD works with a number of City departments, the Woonsocket Housing Authority, non-profits, and other stakeholders to ensure that the planning process is both comprehensive and inclusive. WPDD solicits information from other City departments, the private sector, non-profits, neighborhood-based organizations, and residents regarding existing conditions and strategies for addressing current needs through research.

WPDD recognizes that Woonsocket residents are the center of, and partners in, the development and execution of the FY 2019/2020 Annual Action Plan. WPDD diligently seeks community involvement and provides residents with opportunities to become involved in the

development of the Annual Action Plan. Opportunities for citizen input are provided throughout the planning process through:

- Publications and Postings
- Public Hearings (CDAB open meetings & final public hearing)
- WPDD Community Development Forums (four (4) public information sessions)

WPDD continues to seek new strategies to broaden participation to groups that are served with WPDD's funding. During the FY 2018/2019 and leading into FY 2019/2020, WPDD held a series of Community Development Forums to initiate public discussion on topics of civic interest and update the public on funding opportunities, as well a project/activity successes.

5. Summary of public comments

Although solicited, no written or verbal citizen comments on the FY 2019/20120 Annual Action Plan were received.

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

No verbal or written comments were received.

7. Summary

WPDD continues to make strides towards addressing the community needs and the Consolidated Plan priorities through community involvement, evaluating past performance, and responding to experience with improved efficiency.

Working with the other two entitlement communities, Pawtucket and Providence, as well as the State, Woonsocket's capacity to effectively administer grants and meet grant and plan goals and objectives has grown exponentially. The partnership between the cities and the state creates a pool of subject matter experts with a wide range of experience and education.

PR-05 Lead & Responsible Agencies

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency
Lead Agency	Woonsocket	Planning & Development (WPDD)

Table 1 – Responsible Agencies

Narrative

Mayor Lisa Baldelli-Hunt, as the chief elected official for the City, is entrusted with the ultimate responsibility for the carrying out of the action plan. She has designated the WPDD as the lead agency to administer the CDBG, HOME, and ESG funds, which constitute the majority of the resources dedicated to the implementation of the plan.

The WPDD administers the allocation of program funds and contracts with other private and public agencies for program delivery. The contracts set the conditions by which the assistance is given and specify the nature and frequency that reports must be submitted to the WPDD to document the utilization of funds in accordance with the Action Plan.

This approach minimizes the amount of limited resources being expended for administration of the various programs and maximizes the resources dedicated to meeting the City's community development and housing needs. Each agency focuses on a specific area of the action plan and the specific population, which the agency is designed to serve. This approach increases the effectiveness and efficiency of the delivery of programs. A more formal institutionalized approach is unnecessary, especially due to the number of agencies involved and the frequent interaction.

Annual Action Plan Public Contact Information

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AP-10 Consultation

Introduction

Coordination and consultation with public and private agencies is important to the City of Woonsocket when developing its Annual Action Plan. Woonsocket is involved in formalized planning processes within the City, through the Continuum of Care, the Consolidated Homeless Fund (CHF) Partnership, and the Main Street Livability Initiative.

The CHF Partnership coordinates its program and distribution methods with State homeless funds and Federal Title XX funds. Additionally, the CHF Partnerships meets regularly with the RI Continuum of Care (COC) and includes a COC representative on the CHF Partnership application/sub-recipient review committee.

The Rhode Island Interagency Council on Homelessness is closely aligned with the CHF Partnership and is working to help the Partnership coordinate with and access other federal and state resources for homelessness and social services.

In addition, WPDD staff meets with community groups throughout the year to offer information and solicit input regarding WPDD programs and future activities. For two (20 weeks in December, the WPDD hosts Community Development Forums where information is exchanged and problems solved. Specific grant initiatives also create opportunity for community gathering and learning.

Summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

The City of Woonsocket strives to be in constant contact with various public and private agencies to ensure funding priorities are in line with current community development goals. WPDD provides Certificates of Consistency throughout the year to housing developers or service providers applying for various sources of funding. The City is involved in many community collaborations with an aim to enhance coordination between housing and service providers and better serve the community.

In support of the Consolidated and CoC Strategic Plans to End Homelessness, WPDD works in partnership with Rhode Island's other Entitlement communities, Pawtucket and Providence, as well as with the State of RI and the CoC fiduciary agent, RI Housing. The Partnership works closely with the Coalition for the Homeless to support subsidized affordable housing units that are linked to mainstream and social supports, including primary and behavioral health care and housing. Homelessness in RI communities is considered a statewide state-supported issue.

A primary sub-recipient of WPDD is Community Care Alliance (CCA) (formerly Family Resources Community Action (FRCA) through a merger with NRICS in 2014). CCA is one of the oldest not-for-profit 501(c)(3) family centered social service organizations in Rhode Island. Dedicated to serving vulnerable families in Woonsocket and throughout Northern Rhode Island, CCA has been a leader in the development of community-based services to strengthen families.

Originally known as the Woonsocket Day Nursery (1891) and then Woonsocket Child and Family Services (1940's), the agency was renamed Family Resources, Inc. in the early 1990's to reflect its growing array of family based support services and then Family Resources Community Action (FRCA) in 2000.

In 1997, the agency affiliated with the Woonsocket Shelter Community Action Program (WSCAP) expanding its reach to serve the homeless and assist low-income persons in addressing basic needs such as food, clothing, housing and utility assistance. An employment and training program has evolved by partnering with local businesses to create economic opportunities for individuals and families living in poverty. WPDD works closely with CCA in the delivery of public and assisted housing, resident physical and mental health services, as well as other social service providers such as Senior Services inc., YWCA of RI, Connecting Children & Families, Thundermist Health and Riverz Edge.

Local social service providers participate in Community Development Forums designed and presented by WPDD to enhance and support civic engagement and community sustainability.

Describe coordination with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop ESG performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

Woonsocket, as a member of the CHF Partnership, coordinates its program and distribution methods with State homeless funds and federal Title XX funds. Additionally, the CHF Partnerships meets regularly with the RI Continuum of Care (COC) and includes a COC representative on the CHF Partnership review committee.

The Rhode Island Interagency Council on Homelessness is closely aligned with the CHF Partnership and is working to help the Partnership coordinate with and access other federal and state resources for homelessness and social services.

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

The CHF Partnership coordinates its program and distribution methods with State homeless funds and Federal Title XX funds. Additionally, the CHF Partnerships meets regularly with the RI Continuum of Care (COC) and includes a COC representative on the CHF Partnership review committee.

The Rhode Island Interagency Council on Homelessness is closely aligned with the CHF Partnership and is working to help the Partnership coordinate with and access other federal and state resources for homelessness and social services.

2. Agencies, groups, organizations and others who participated in the process and consultations

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?
Thundermist Healthcare	Not for profit – social service	CDBG
Connecting for Children & Families	Not for profit – social service	CDBG
Senior Services, Inc.	Not for profit – social service	CDBG
Woonsocket Head Start	Not for profit – social service	CDBG
City of Providence	Municipal Government	ESG, Partner in CoC/HMIS
City of Pawtucket	Municipal Government	ESG, Partner in CoC/HMIS
City of Woonsocket	Municipal Government	CDBG, HOME, ESG, Partner in CoC/HMIS
RI Office of Housing and Community Development	State Government	ESG
RI Department of Human Services	State Government	ESG
Community Care Alliance	Not for profit – social service	CDBG, ESG
YWCA of RI	Not for profit – social service	CDBG
Museum of Work & Culture	Not for profit – social service	CDBG
Haven of Grace (transitional housing)	Not for profit – social service	CDBG, ESG
Stadium Theatre	Not for profit – social service	CDBG
Neighborworks Blackstone River Valley (WNDC)	Not for profit – social service CHDO	CDBG, HOME
RI Historical Preservation & Heritage Commission	State Commission	CDBG, HOME
Woonsocket Boys & Girls Club	Not for profit – social service	CDBG
Woonsocket City Council	Municipal Government	CDBG, HOME, ESG
RI Department of Behavioral Healthcare, Developmental Disabilities and Hospitals	State Government	ESG
RI Governor's Office Policy staff	State Government	CDBG, HOME, ESG
RI Housing (Lead COC Applicant)	Quasi-State Government & CoC Lead Agent	ESG, HOME, Partner in CoC/HMIS
RI Housing Resource Commission	State Commission	ESG

United Way/philanthropic organization	Not for profit	ESG, HOME
Woonsocket Housing Authority	Public Housing Authority	CDBG, HOME
Community Development Advisory Board	Woonsocket Board	CDBG, HOME, ESG

Table 2 – Agencies, groups, organizations who participated

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination

Consultation was via email, Woonsocket-based open public meetings*, and person-to-person discussions. Meetings were held on:

- November 5, 2018 NOFA Advertised
- November 29, 2018 (10:00 am) Public Meeting
- December 4, 2017 (Housing, Homelessness & Domestic Violence Issues)
- December 6, 2017 (Public Services)
- December 11, 2017 (Economic Development)
- December 13, 2017 (Infrastructure, Neighborhood Improvements)
- December 18, 2018 (Consolidated Homeless Fund Partnership (CHFP) Meeting)
- January 11, 2019 CDBG grant applications are due
- January 22, 2019 Resolution is passed for the creation of a CD Advisory Board
- February 13, 2019 (Community Development Advisory Board)
- February 27, 2019 (Community Development Advisory Board)
- March 13, 2019 (Community Development Advisory Board)
- March 21, 2019 (Community Development Advisory Board)
- August 8, 2019 (Public Hearing regarding Action Plan/CDAB meeting)
- TBD (Public Hearing regarding Action Plan/CDAB meeting – if necessary)

The Community Development Advisory Board is appointed by the Mayor and is representative of the various segments of the City. Members are responsible for reviewing applications, hearing testimony and proposals given at public hearings, meetings or other methods of communications to formulate and recommend a spending plan for CDBG, HOME, and ESG funds to the Mayor. Staff from the Department of Planning and Development provides technical assistance to the Board.

The CHF Partnership coordinates its program and distribution methods with State homeless funds and federal Title XX funds. Additionally the CHF Partnership meets regularly with the RI Continuum of Care (COC) and includes a COC representative on the CHF Partnership review committee.

The Rhode Island Interagency Council on Homelessness is closely aligned with the CHF Partnership and is working to help the Partnership coordinate with and access other Federal and State resources for homelessness and social services.

The greatest impact of consultation is seen in the delivery of the Emergency Solutions Grant. Thanks to the CHF partnership, policies, practices, forms, and expectations are standardized

across the state. The statewide issue of homelessness and homeless prevention is being tackled with a consolidated professional effort.

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

N/A

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

The reviewing of Local and State Consolidated Annual Action plans, as well as the Annual Plan of the Woonsocket Housing Authority aided the City in the assessment of needs and the formulation of both general and specific plans to meet those needs.

Many of the critical needs facing Woonsocket residents have been identified as state-wide needs that require state-wide, collaborative interventions. A primary example is the condition of homelessness, which is being addressed through the Consolidated Homeless Fund Partnership (CHFP). Through the partnership, the collective attention maximizes the potential of our resources and raises performance standards to a new level.

Other plans that are integral to the strategic planning process include, but are not limited to, the following:

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Main Street Livability Plan (RI Statewide Planning- DOA)	City of Woonsocket	economic development and neighborhood stabilization efforts
Woonsocket Comprehensive Plan	City of Woonsocket	economic development and neighborhood stabilization efforts
Blackstone River Valley National Heritage Corridor Commission	Blackstone Valley Bikeway	economic development and neighborhood stabilization efforts
Woonsocket Pedestrian Plan	YWCA, City of Woonsocket	neighborhood stabilization and public welfare
Safe Routes to School	City of Woonsocket/RI Division of Planning - DOT	neighborhood stabilization and public welfare
Tree Planting Plan (RI DEM Division of Environments (RI Tree Council)	City of Woonsocket	neighborhood stabilization
Choice Neighborhoods	NWBRV, City of Woonsocket	affordable housing and neighborhood stabilization
Our Neighborhoods (formerly Sustainable Communities)	NWBRV, City of Woonsocket	affordable housing and neighborhood stabilization
State Land Use & other State Regional Plans	RI DEM, RI DOT, RIHPHC RI Div of Planning (OHCD) & Grow Smart RI	economic development & land use

Table 3 – Other local / regional / federal planning efforts

Narrative

The RI Continuum of Care, RI Housing Resources Commission, and RI Department of Health (lead hazard prevention) have engaged in generic planning efforts that work in tandem with local community development efforts. Because of the geography of the state and the close proximity of community development professionals, intellectual capital is more easily tapped and utilized. More specific plans are detailed above.

Researching resources and community development ideas and best practices outside the borders of Rhode Island, as well as the beyond New England, has proven to be a valuable activity. Technology makes the search swift and the ideas accessible.

AP-12 Participation

1. Summary of citizen participation process/efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

A citizen participation program is instrumental in obtaining input from the community and organizations to design and implement programs that will benefit low and moderate-income residents of Woonsocket. The citizen participation process includes, but is not limited to, a series of public meetings/hearing(s) from which citizen input is obtained and utilized in determining the City's needs, developing strategies, and establishing goals and objectives. Community input, along with the assistance of the Community Development Advisory Board, helps to ensure that federal funds are appropriately allocated. The design of the process encourages the participation of low and moderate-income persons in the organizations that serve them and other areas applicable for CDBG funds, such as economic development and neighborhood stabilization. Organizations seeking CDBG, HOME, and ESG funds initially have their programs and request for funds presented to a Community Development Advisory Board for review, and then the programs are presented for final review during a public hearing held by the City Council.

The Community Development Advisory Board which is appointed by the Mayor, is representative of the various segments of the City. Members are responsible for reviewing applications, hearing testimony and proposals given at public meetings, hearings or other methods of communications to formulate and recommend a spending plan for CDBG, HOME, and ESG funds to the Mayor. Staff from the Department of Planning and Development provides technical assistance to the Board.

Announcements encouraging public participation in the meetings and hearings were posted at various locations throughout the City, published in the daily newspaper (NOFA & Public Hearing), included on the State of RI Secretary of State's website, and included in a Federal Grants Bulletin. Newsletters are electronically mailed (e-mailed) to social service providers, faith-based organizations, and other relevant parties. The announcement/newsletter specifically addresses community development issues, list public meetings/forums and encouraged involvement and comment.

Many organizations are solicited for input. Even with average response, the City is trying to establish more innovative outreach strategies in an attempt to encourage participation of organizations, residents of public housing, and the public at large. We find that when engaging community partners (volunteers and otherwise) it is important to offer tasks that have valuable and tangible outcomes. It goes without saying that recognition of the fine efforts of contributors is critical.

No written citizen comments were received for program year 2019. Although written comments are preferred, unwritten commentary also was encouraged and considered.

The WPDD has utilized the services of the RI Foundation's *Initiative for Nonprofit Excellence*. "Rhode Island Foundation launched the Initiative for Nonprofit Excellence (INE) in 2008 "to build the capacity of nonprofit organizations so they can better achieve their missions." The Initiative's long term intended impact is ultimately to improve the quality of life for Rhode

Islanders through strengthening the nonprofit sector. INE provides tools and information to promote good governance, sound management, cross-sector collaboration, and reliable research. The Initiative supports nonprofits by sharing best practices, providing tools, doing good research, and encouraging leadership.” WPDD and the RI Foundation believe WPDD’s participation supports our civic leadership efforts.

The goals and objectives as outlined in the FY 2019-2020 Annual Action Plan will be carried out by partnerships between local public and private sector organizations. A diverse network of elected officials, government agencies, private nonprofit organizations, faith-based organizations, and advisory boards contribute to coordinating the activities and share a sense of responsibility for the achievement of housing and community activities. The City greatly appreciates the time and effort each individual and organization puts forth to provide a wide range of activities for the low-income population of Woonsocket.

Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Secretary of State Open Meetings Website Posting	General public and service providers	Meeting/participation of low-to-moderate	No written comments received. Verbal appreciation on municipal efforts delivered by participants	All comments accepted	www.ci.woonsocket.ri.us www.chfpartnership.org www.hrc.ri.gov http://sos.ri.gov/public info/open meetings
Electronic flyers	Service providers	Meeting participation/inquiries of low-to-moderate	No written comments received. Verbal appreciation on municipal efforts delivered by participants	All comments accepted	www.ci.woonsocket.ri.us www.chfpartnership.org www.hrc.ri.gov http://sos.ri.gov/public info/open meetings
Meetings	Public, staff, service providers	Meeting participation of low-to-moderate,	No written comments received. Verbal appreciation on municipal efforts delivered by participants	All comments accepted	www.ci.woonsocket.ri.us www.chfpartnership.org www.hrc.ri.gov http://sos.ri.gov/public info/open meetings

Table 4 – Citizen Participation Outreach

AP-15 Expected Federal Resources

Expected Resources 91.220(c)(1)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5 of 5			
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$ Pro Income	Total: \$
CDBG	public – federal	Admin and Planning Economic Development Housing Public Improvements Public Services	\$1,285,344	\$1,759.04 PY 2018 – 19 (4-29-19)	\$42,053.12	\$1,329,156.16
HOME	public – federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental rehab Admin	\$427,242	\$400,000 (Estimate) (4-29-19)	\$0	\$827,242
ESG	public - federal	Shelter Homeless Prevention Admin	\$113,674	\$0	\$0	\$113,674

Table 1 - Expected Resources – Priority Table

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

HOME projects leverage funds from conventional lenders providing mortgages and home equity loans. Owner contribution, as well as repaid and recaptured funds, which provide a contribution to affordable housing. Working with other housing-related agencies such as Navigant Credit Union, RI Housing, the Housing Network, NeighborWorks Blackstone River Valley (NWBRV), Habitat for Humanity and private developers, the City continues to leverage housing funds and overcome housing barriers.

The CHF Partnership leverages ESG funds into a statewide effort to reduce homelessness. The needs assessment process, coupled with the consolidated application review, assures (the the maximum extent possible) that homeless needs are met.

CDBG funds are leveraged through private partnerships and other state, federal, local grants. Section 8 funds: For 2017/18 HUD's HCV (Sec 8) Renewal Funding was \$5,041,572; For 2016/17 HUD's HCV (Sec 8) Renewal Funding was \$5,167,622.

HUD renewal funding is for 730 "Base Units" (vouchers), allotted to WHA. However, because some apartments rent for more than the average, in 2017 WHA was only able to utilize an average of 650 vouchers per month for the year 2017. Even by utilizing only 650 vouchers per month, WHA ended up overspending the amount HUD funded in 2017, making up the difference by using Sec 8 reserve balances WHA had accumulated.

In the 650 average monthly vouchers used in 2017, WHA had a monthly average of 35 "set asides", also known as NEDs (Near Elderly Disabled).

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

The recent reorganization and revitalization of the Redevelopment Agency of Woonsocket (RAW) will allow for future designations of redevelopment areas where resources and efforts will be employed for the purpose of economic development and neighborhood stabilization. RAW will be working closely with Woonsocket Department of Planning and Development on future initiatives.

AP-20 Annual Goals and Objectives

Goals Summary Information (program year: July 1, 2019 – June 30, 2020)

The following table offers details regarding benefit, including the number and type of families that will benefit from the proposed activities. Again, the entire City is categorized as LMI.

Goal	Category	Geographic & Target Area	Needs Addressed	Funding	Goal Outcome Indicator
Preserve existing housing stock (DH)	Affordable Housing	City-wide	Affordable Housing	HOME	Rental units rehabilitated: 12 Household Housing Units (1 projects)
Address and reduce exposure to lead hazards (DH)	Affordable Housing	City-wide	Affordable Housing	HOME (prior funding from LHC and LHRDG)	Lead safe clearance on all rehab and homebuyer projects (6 rental units and 1 buyer projects)
Increase affordable homeownership (DH)	Affordable Housing	City-wide	Affordable Housing	HOME	Direct down payment assistance to 4 first-time LMI homebuyer
Prevent Homelessness and Support /Shelter Operations (DH)	Affordable Housing	City-wide	Affordable Housing	ESG, CDBG	Shelter and homeless prevention (60 - 65 families, 140 persons)
Prevent Homelessness and Support Rapid Re-Housing (DH)	Affordable Housing	City-wide	Affordable Housing	ESG	Transitional Housing and homeless prevention (8 families/ 32 individuals)

Youth/Adult Services (SLE)	Suitable Living Environment (non-housing community development)	City Wide	Public Service	CDBG	Public service (CCA, YWCA, RiverzEdge WPD – citywide Main St. area) activities other than Low/ Moderate Income Housing
Senior Services (SLE)	Suitable Living Environment (non-housing community development)	City Wide	Public Service	CDBG	Public service activities other than Low/Moderate Income Housing Benefit 1200 Senior Services
Improve public facilities (SLE)	Suitable Living Environment (non-housing community development)	City Wide	Public Service	CDBG	Other: Fire equipment Road reconstruction
Maintain Neighborhood Integrity (SLE/ED)	Suitable Living (non-housing community development)	City Wide	Public Service	CDBG	Other: Code Enforcement, 750 inspections, Com Façade program -2 Small Bus Loan - 1

Table 2 – Goals Summary

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

The Homebuyer Assistance Program expects to serve 4 households with down payment assistance in FY 2019-20. Of the 4 households, WPDD estimates that all households will have a household income at or less than 80% AMI. WPDD expects to serve 12 rental units (5 projects). It is estimated that 4 units will house tenants with household income between 0-50%. All other tenant income will be at or less than 60% AMI. WPDD expects to serve 2 single-family homeowners whose incomes are at or less than 80% AMI.

The City of Woonsocket does not intend to use HOME funds in FY 2019-2020 for tenant based rental assistance activities.

AP-38 Projects

Project Summary Information

The following table identifies activities in sufficient detail, including the number and type of families that will benefit from the proposed activities, locations and estimate of the percentage of funds, so that citizens know the degree to which they may be affected.

Project Name	Target Area	Goals & General Priorities Supported	Needs Addressed	Funding	% of Funding
CDBG	\$1,285,344.00				
CDBG Administration				\$90,000.00	7.00%
Fire Equipment	City-wide	Suitable living environment	Public safety	\$25,000.00	1.94%
Code Enforcement	City-wide	Suitable living environment	Public safety/ neighborhood stabilization	\$65,000.00	5.05%
Section 108 Loan Repayment	Woonsocket Middle School Project	Suitable living environment	Neighborhood stabilization	\$50,825.00	3.95%
Commercial Façade Program	Main Street, Overlay District	Economic Develop Suitable living environment	Economic Develop. Neighborhood Stabilization	\$109,519.00	8.52%
Small Business Loan Program	City Wide	Economic Develop Job Creation	Economic Development	\$5000.00	0.38%
Road Reconstruction	City Wide	Suitable living environment	Public safety	\$385,000.00	29.95%
Side Walk Reconstruction	City Wide	Suitable living environment	Public safety	\$150,000.00	11.67%
Demolition/Clear -- ance/Acquisition	City Wide	Suitable living environment	Public safety	\$215,000.00	16.72%
Micro-enterprise program	Main Street, Overlay District	Economic Develop. Suitable living environment	Public service	\$20,000.00	1.55%
WFD - Feet on the Beat	City Wide	Suitable living environment	Public safety	\$25,000.00	1.94%
City Parks Playgrounds	City-wide	Suitable living environment	Neighborhood stabilization	\$100,000.00	7.78%
Rental/Utility Assistance	City-wide	Suitable living environment	Public service	\$5000.00	0.38%
CCA - Housing Stabilization	City-wide	Suitable living environment	Public service	\$5000.00	0.38%

YWCA of RI	City-wide	Suitable living environment	Public service	\$5,000.00	0.38%
Senior Services Inc. (AAC)	City-wide	Suitable living environment	Public service	\$0.00	0.00%
Sojourner House	City-wide	Suitable living environment	Public service	\$5,000.00	0.38%
Redevelopment Agency	City-wide	Suitable living environment	Public service	\$25,000.00	1.94%
Total CDBG				\$1,285,344.00	100.00%
HOME	\$427,242.00				
HOME Admin				\$ 42,724.20	10.00%
CHDO – TBD	City-wide	Decent housing	Affordability	\$ 64,086.30	15.00%
Buyer Down Payment Assistance Program	City-wide	Decent housing	Affordability	\$ 60,000.00	14.04%
Code-Related and Lead Hazard Repair Program	City-wide	Decent housing	Affordability	\$ 260,431.50	60.96%
Total HOME				\$427,242.00	100.00%
ESG	\$113,674.00				
ESG Admin				\$8,525.00	7.50%
Shelter and HPRP	Agency: CCA	Decent housing	Accessible (emergency)	\$63,089.00	60.00% (\$63, 089.07)
Rapid Re-Housing		Decent housing	Rental Assistance	\$42,060.00	
Total ESG				\$113,674.00	

Table 3 – Project Summary

Administrative CAPS

The above table indicates that the following caps will not be exceeded:

- 20% administrative cap for CDBG
- 15% public service (social services) cap for CDBG
- 10% administrative cap for HOME
- 7.5% administrative cap for ESG

CAPS Other: The table also shows that there is a **15% CHDO** minimum set-aside for HOME, and the amount of ESG funds for street outreach and emergency shelter operations/activities does not exceed **60%** of the City's fiscal year ESG grant or the amount of FY 2019 ESG funds committed for homeless assistance activities.

AP-35 Funded Activities & Projects

91.220(d) Activities

CDBG, HOME, and ESG funded activities have been selected for inclusion in this Plan based on 2015-2019 Consolidated Plan priority needs, objectives, and public input. During FY 2019-2020 WPDD will engage in community development activities through increasing the availability and quality of affordable housing, the delivery of public services, investment in neighborhood facilities, and economic development activities. In addition, WPDD balances the growing need for services with HUD regulations and budget constraints.

Activities presented in this section fall into four major priority areas, which also reflect WPDD's institutional structure and approach to program delivery:

- **Affordable Housing**
 - Multifamily Rehabilitation
 - Single Family Repair, and Homebuyer Assistance
 - Community Housing Development Organizations (CHDOs)
- **Public Services**
 - Youth Services
 - Health Services
 - Homeless Prevention
 - Social Services
 - Elderly Services
- **Neighborhood Facilities & Improvements**
- **Code Enforcement**
- **Public and Private Facilities Improvements**
- **Economic Development**

Annual Objectives. The Plan identifies programs and activities that will be used toward meeting WPDD's goals. As required by HUD, each activity is linked to one of three federal program objectives:

- 1) decent housing
- 2) suitable living environment
- 3) economic development

Each objective is matched with one of three outcome measures.

91.220(e) Outcome Measures

- 1) availability/accessibility
- 2) affordability
- 3) sustainability

	Project Name	Target Area	Federal Program Objective	Outcome Measured	Needs Addressed	Description	Number & Type of Beneficiary	Funding	Matrix Code	Anticipated Start	Anticipated Completion
	CDBG									7/1/19	6/30/20
1	CDBG Administration							\$90,000.00	21 A	7/1/19	6/30/20
2	Fire Equipment	City-wide	Suitable living environment	Accessible	Public safety	Purchase of new firefighting equipment	LMI household – city-wide 41,500	\$25,000.00	03 O	7/1/19	6/30/20
3	Code Enforcement	City-wide	Suitable living environment	Sustainable	Public safety/neighborhood stabilization	Enforcement of code via individual inspections of unsafe/unsanitary conditions.	LMI household-city-side 41,500 – target 200 per month or approx. 1500 inspections annually	\$65,000.00	15	7/1/19	6/30/20
4	Section 108 Loan Repayment	Middle School Project	Suitable living environment	Accessible	Neighborhood stabilization	Payment on construction loan for middle school	LMI household – city-wide 41,500	\$50,825.00	19 F	7/1/19	6/30/20
5	Public Facility Improvement	City-wide	Suitable living environment	Sustainable	Neighborhood stabilization	Road Reconstruction	LMI household-city-wide 41,500	\$385,000.00	03 K	7/1/19	6/30/20
6	Com Facade Restore	Main St area	Suitable living environment	Sustainable	Business Support Neigh Stab	Economic Devel Façade Upgrade	LMI household-city-wide 41,500	\$109,519.00	14 E	7/1/19	6/30/20
7	Feet on the Beat – WPD	City-wide	Suitable living environment	Sustainable	Public Safety	Bike/Walking Patrols	LMI household-city-wide 41,500	\$25,000	05 I	7/1/19	6/30/20
8	Rental Assistance	City-wide	Suitable living environment	Accessible	Public Service	Displacement	LMC – participants 4	\$5000.00	05 Q	7/1/19	6/30/20
9	SM Business Loan	City-wide	Suitable living environment	Sustainable	Business Support Neigh Stab	Economic Development	LMI household-city-wide 41,500	\$50000.00	18 A	7/1/19	6/30/20
10	Micro-Enterprise Grant	City-wide	Suitable living environment	Sustainable	Business Support Neigh Stab	Economic Development	LMI household-city-wide 41,032	\$20,000.00	18 C	7/1/19	6/30/20
11	Public Facility Improvement	City-wide	Suitable living environment	Sustainable	Neighborhood stabilization	Sidewalk Reconstruction	LMI household-city-wide 41,500	\$150,000.00	03 L	7/1/19	6/30/20
12	Public Facility Improvement	City-wide	Suitable living environment	Sustainable	Neighborhood stabilization	Clearance/ Demolition/ Acquisition	LMI household-city-wide 41,500	\$215,000.00	04	7/1/19	6/30/20
13	Public Facility Improvement	City-wide	Suitable living environment	Sustainable	Neighborhood stabilization	City Parks Recreation	LMI household-city-wide 41,500	\$100,000.00	04	7/1/19	6/30/20
14	Senior Services (1)	City-wide	Suitable living environment	Sustainable	Public Service	Alternative Care	LMI household-city-wide 41,500	\$0.00	05 A	7/1/19	6/30/20
15	YWCA	City-wide	Suitable living environment	Sustainable	Public Service	After School Tutoring	LMI household-city-wide 41,500	\$5,000.00	05 D	7/1/19	6/30/20

1 6	CCA	City-wide	Suitable living environment	Sustainable	Public Service	Housing stabilization	LMI household-city-wide 41,500	\$5000.00	05 S	7/1/19	6/30/20
1 7	Sojourner House	City-wide	Suitable living environment	Sustainable	Public Service	Housing stabilization	LMI household-city-wide 41,500	\$5000.00	05 G	7/1/19	6/30/20
1 8	Redevelopm ent Agency	City-wide	Suitable living environment	Sustainable	Business Support Neigh Stab	Economic Development	LMI household-city-wide 41,500	\$25,000.00	17 A	7/1/19	6/30/20
	Total CDBG							\$1,285,344			
	HOME									7/1/19	6/30/20
1	HOME Admin							\$42,724.00		7/1/19	6/30/20
2	CHDO	TBD	Decent housing	Affordable	Housing	Home rehab – energy efficiency	1 st time homebuyer Affordable unit (s)	\$60,000.00		7/1/19	6/30/20
3	Down Payment Assistance Program	City-wide	Decent housing	Affordable	Housing	Down-payment assistance	Four (4) households	\$60,000.00		7/1/19	6/30/20
4	Housing Rehab Program	City-wide	Decent housing	Sustainable	Housing	Code and lead hazard repair cost assistance	6 projects (12 units)	\$260,431.50		7/1/19	6/30/20
	Total HOME							\$427,242.00		7/1/19	6/30/20
	ESG									7/1/19	6/30/20
1	ESG ADMIN							\$8,525.00		7/1/19	6/30/20
2	Emergency Shelter and Homeless Prevention (Intensive Program)	City-wide	Decent housing	Affordable/ Accessible	Housing	Shelter Operations		\$63,089.00	05Q	7/1/19	6/30/20
3	Rapid Re-Housing	City-wide	Decent housing	Affordable/ Accessible	Housing	Rapid Re-housing		\$42,060.00	05Q	7/1/19	6/30/20
	Total ESG							\$113,674.00		7/1/19	6/30/20

Table 4 – Project Information

Comparison to 5-Year Goal for Priority Funding CDBG/HOME/ESG				
Activity	2015-2019 Priority Funding	% of total	2019-2020 Priority Funding	% of Annual total
Neighborhood Revitalization	\$4,250,000	56.66%	\$649,087.00	35.54%
Safe and Affordable Housing	\$2,370,022.00	27.69%	\$465,431.00	25.48%
Economic Development	\$350,000.00	4.66%	\$369,519.00	20.23%
Social Welfare (Youth, Elderly, Special Needs Populations)	\$297,500	3.47%	\$60,000.00	3.28%
End Chronic Homelessness	\$497,540.00	5.81%	\$105,149.00	5.75%
Program Administration (20, 10, 7.5% caps)	\$1,361,610.00	15.91%	\$177,074.00	9.69%
Total award	\$8,557,529.00		\$1,826,260.00	

Describe the reasons for allocation priorities and any obstacles to addressing underserved

Allocation priorities are always centered on low to-moderate income benefit, wise investments, and residents that are the most in need. There are several obstacles that will make it difficult to meet underserved needs. They include the cost of rehabilitation (including lead hazard reduction activities), as well as the inability of many lower-income homeowners to obtain traditional loans. Predatory lending prevents owners from securing an equity position that would enable them to apply for and secure financing for home improvements. The ability to keep up with even minimal maintenance decreases as the homeowner ages. Additionally, Woonsocket's housing stock contains a high percentage of units that were constructed prior to 1979 (88.4%). The potential for lead hazards in these structures is quite high. Vigilance against predatory lending practices and homebuyer education is critical. Also, continued access to low cost funding sources for lead abatement is important if lead hazards are to be eliminated throughout the City.

The cost of rent slightly increased in RI according to the Rhode Island Housing and Housing Works RI annual rent survey for 2017 and updated in 2018. The average 2-bedroom rents throughout the state stands at \$1385.00. Two-bedroom rent in Woonsocket for year-end 2017/18 averages \$1,138.00. According to the survey, Woonsocket offers the third lowest 2-bedroom rental rates in the state (Central Falls & Burrillville are first & second).

Human and other program resources limit the capacity of service providers. Disjointed and duplicated services are stressors to existing resources.

In addition to the general obstacles to meeting underserved needs, the primary obstacle is the threat to continued Community Development Block Grant funding by the federal government. The City continues to identify priority areas based on individual neighborhood demographics. Areas with concentration of low-to-moderate income, public housing residents and minorities will continue to be the priority of all program categories and the basis for allocating investments. Over FY 2019-2020, the City will seek to continue its association with numerous neighborhood-based community centers. Sub-grantee service providers who serve low to moderate income clientele in low to moderate income census tracts and block groups are considered funding targets. The City will continue to monitor agencies and activities, and its own performance, through the analysis of monthly reporting requirements and on-site **monitoring** visits to provide income verification of program participant eligibility. The collection of data used in the annual Consolidated Annual Performance Report is carried on throughout the year; thus, giving the City a continuous stream of information from which to gauge progress and implement necessary amendments.

HUD defines the term "area of low-income concentration" as those census tracts where 51 percent or more of the population has an income equal to or less than the Section 8 low-income limit established. The annual incomes do not exceed 80 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families. As always, the City will also attempt to address the highest public works priorities in low to moderate income areas, and will focus on new opportunities to enhance job creation for low to moderate income people.

Economic development activities will continue to focus on Main Street and the surrounding area (Overlay District) as the epicenter and then expand along the adjacent riverfront area and other

commercial areas of the city. Economic development strategies are enhanced by open discussions and involvement with private industry, businesses, developers, and social service agencies. Both the Director of Planning & Development and the Deputy Director of Housing and Community Development solicit input from outside resources.

Minority populations have increased during the last decade. According to the 2010 Census, of the total population, 14.2 percent (over 18 years of age) are Hispanic or Latino, 5.4 percent are Asian, and 6.4 percent are African American.

The “areas of minority concentration” are those areas where 60 percent of the minority population percentage for the City may reside. In Woonsocket, there is no specific “area of minority concentration” determined by the 2010 Census; however, tracts 174 (blocks 2, 3), 176 (block 1), 179 (blocks 1, 2), 180 (blocks 1, 2, 3), 181 (block 2), 182 (blocks 1, 2), 183 (block 1) & 184 (block 5) show a higher percentage of minorities than other tracts.

Activities involving infrastructure and public facility improvement are generally directed toward low to moderate-income areas. Woonsocket has also developed a strategy to expand homeownership opportunities and lead hazard control cost assistance to lower income households and to provide outreach targeted to minority and other underserved populations. Concerning minority homeownership, the City expects to serve a demographically comparable ratio of minorities through the homeownership and rehab programs. Outreach is a central component of the homeownership strategy. Special efforts are made to reach minority and other traditionally underrepresented groups. Methods include newsletters, press releases, and poster distribution. The City contacts churches/synagogues, community centers, personnel offices of businesses, hospitals, and other public service providers and forwards program information and posters.

AP-50 Geographic Distribution

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

91.220(f) Geographic Distribution:

The 2010 (updated 2016/17) Census has revealed that over fifty one percent (**57.53%**) of the City falls into the low to moderate-income eligibility range; therefore, activities do not need to be restricted to specific census tracts (**unless specified by HUD**). A breakdown is provided below:

Geographic Distribution

TRACT	BLK GRP	LOWMOD	LOW- MOD PCT	POP100	TRACT	BLK GRP	LOWMOD	LOW- MOD PCT	POP100
017300	1	450	35	1270	017900	1	515	71	670
017300	2	755	58	1300	017900	2	995	71	1400
017300	3	235	57	410	017900	3	745	76	980
017400	1	930	57	1620	018000	1	830	79	1045
017400	2	440	72	610	018000	2	520	54	955
017400	3	1370	73	1860	018000	3	495	87	565
017500	1	460	35	1300	018100	1	565	74	760
017500	2	610	46	1315	018100	2	1225	65	1865
017500	3	455	39	1145	018200	1	750	60	1235
					018200	2	540	43	1235
017600	1	840	70	1200					
017600	2	725	50	1440	018300	1	1305	85	1535
017700	1	350	35	985	018400	1	995	58	1715
017700	2	695	46	1495	018400	2	140	19	705
017700	3	550	41	1325	018400	3	355	35	1010
					018400	4	250	34	730
017800	1	380	36	1045	018400	5	1095	64	1685
017800	2	230	41	555					
017800	3	490	76	640	018500	1	485	59	815
					018500	2	475	48	975
					018500	3	185	22	835
							22,970	57.53%	40,285

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City continues to identify priority areas based on individual neighborhood demographics. Areas with concentration of low-to-moderate income, public housing residents and minorities will continue to be the priority of all program categories and the basis for allocating investments.

Over FY 2019-2020, the City will seek to continue its association with numerous neighborhood-based community groups. Sub-grantee service providers who serve low to moderate-income clientele in low to moderate income census tracts and block groups are considered for funding. The City will continue to monitor agencies through the analysis of bi-monthly reporting requirements and on-site monitoring visits to provide income verification of program participant eligibility.

HUD defines the term “area of low-income concentration” as those census tracts where 51 percent or more of the population has an income equal to or less than the Section 8 low-income limit established. The annual incomes do not exceed 80 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families. As always, the City will also attempt to address the highest public works priorities in low to moderate income areas, and will focus on new opportunities to enhance job creation for low to moderate income people.

Economic development activities will continue to focus on Main Street as the epicenter and then expand along the adjacent riverfront area and other commercial areas of the City. Economic development strategies are enhanced by open discussions and involvement with private industry, businesses, developers, and social service agencies. Both the Director of Planning & Development and the Deputy Director of Housing and Community Development solicit input from outside resources.

The percentage minority groups increased during the last decade. According to the 2010 Census, of the total population, 14.2 percent (over 18 years of age) are Hispanic or Latino, 5.4 percent are Asian, and 6.4 percent are African American. The “areas of minority concentration” are those areas where 60 percent of the minority population may reside. In Woonsocket, there is no specific “area of minority concentration” determined as of the 2010 Census; however, tracts 174 (blocks 2, 3), 176 (block 1), 179 (blocks 1, 2), 180 (blocks 1, 2, 3), 181 (block 2), 182 (blocks 1, 2), 183 (block 1) & 184 (block 5) show a higher percentage of minorities than other tracts.

Activities involving infrastructure and public facility improvement are generally directed toward low to moderate-income areas. Woonsocket has also developed a strategy to expand homeownership opportunities and lead hazard control cost assistance to lower income households and to provide outreach targeted to minority and other underserved populations. In regard to minority homeownership, the City expects to serve a demographically comparable ratio of minorities through the homeownership and rehab programs. Outreach is a central component of the homeownership strategy. Special efforts are made to reach minority and other traditionally underrepresented groups. Methods include newsletters, press releases, and poster distribution. The City contacts churches and synagogues, community centers, personnel offices of businesses, hospitals, and other public service providers and forwards program information and posters.

AP-55 Affordable Housing

91.220(g) Affordable Housing

Table for One Year Goals

One Year Goals for the Number of Households to be Supported by the City's sub-recipient CCA through ESG.	
Homeless	138
Non-Homeless	0
Special-Needs (10%)	2
Total	140

Affordable Housing by Support Requirement

Rental Assistance	12 units (CDBG & ESG funds) ***
The Production of New Units	1 (CHDO)
Rehab of Existing Units	12 units (4 projects) (HOME)
Acquisition of Existing Units	0
Down payment Assistance	4 (HOME)
Total	29

Table 7 - One Year Goals for Affordable Housing by Support Type

*** Community Care Alliance Housing Stabilization program

AP-60 Public Housing

91.220(g) Public Housing

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

The Woonsocket Housing Authority (WHA) Annual Plan is consistent with the City's Annual Action Plan presented here.

WHA is working to address the housing needs of Woonsocket on a regional level rather than continuing to increase the supply of affordable housing within Woonsocket. One of the strategies is to expand the homeownership program with the Section 8 Certificate Homeownership option.

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

Goal 6 of the Woonsocket Housing Authority Annual Plan states that they will continue to develop a positive working relationship with the resident organizations of the Woonsocket Housing Authority through the following actions:

- Work with resident organizations to establish a resident participation policy.
- Evaluate the availability of additional financial resources for the Resident Advisory Board and other resident associations.
- Review annually MOU's with social clubs and family development resident associations.
- Review Resident Advisory Board (RAB) by-laws to conform terms of membership to 5-year annual plan cycle.
- At this time all but one site has active resident organizations engaged resident information and development. The remaining site will be reactivated with election of officers over the next two months. All sites are represented in the Annual Planning process and informed as to the goals and objectives. Monthly RAB meetings are held with a WHA representative as a speaker to keep residents informed of on-going issues and process. The City will work with the Woonsocket Housing Authority (WHA) in its goal to move families to self-sufficiency and homeownership. Potential first-time homebuyers will be solicited from graduates of the WHA's Family Self-sufficiency program. The City will provide other program information to the WHA on a regulation basis and gather their input at the publicly held Community Development Forums.

Public Housing Needs & Improvements

There are a total of 1,212 public housing units in Woonsocket. For 2017/18, the Woonsocket Housing Authority compiled a needs summary of the most critical maintenance issues and needed improvements for their six properties. The Family Developments at Morin Heights and Veteran's Memorial appear to need the greatest attention with critical improvements estimated

to be between \$25 Million and \$20 Million respectively. The WHA has continued to initiate a number of tenant and common space improvements, lead paint abatement and building envelope improvements, particularly Morin Heights which needs a number of building exterior updates. Overall, the four remaining properties focused on housing elderly and disabled persons need substantially less physical maintenance, indicating that they are in generally better condition. Critical repairs for these properties range from \$5 Million to \$20 Million per property.

The WHA is considering several medium and long-term strategies to stabilize the portfolio. The strategies fall into two approaches:

- Preserve a large portion of the portfolio through carefully planned redevelopment actions using mixed finance models; and
- Expand the Housing Choice Voucher Program and use these vouchers to promote mobility and access to employment for family public housing resident and to support private sector redevelopment in the downtown and proximate to transportation nodes and other key locations.

Specific activities that may occur during the period covered by this Housing Agency Plan include:

- Re-develop as many family units as financially possible to be safe/code compliant.
- The Woonsocket Housing Authority (WHA) pursue Transforming Rental Assistance initiative and finally work with local non-profit groups to promote mixed financing for family units where possible, including pursuing state tax credit financing.

Home-ownership programs are planned in collaboration with the City's Planning Department

No HOPE VI Grants will be sought

No conversion of public housing under Section 22 or Section 33 of the 1937 Housing Act is planned for the fiscal year covered by this Plan.

Public Housing Resident Initiatives

The following information, in regard to resident initiatives, is part of the WHA Annual Action Plan:

Use local social service agencies whenever possible to meet the special needs of residents.

- Research mixed finance options.
- Advocate for the needs of residents who are elderly, disabled, and families in crisis on the local, state and federal level.
- To assist working residents, begin offering extended hours one day per week at a WHA management office or the Service Center.
- Work closely with the local service agencies such as, but not limited to, NeighborWorks Blackstone River Valley, Community Care Alliance, Head Start, Senior Services Inc., YWCA of Greater RI, Riverz Edge Arts, URI for Senior programs, etc. Job training and job readiness along with specialty skills training are part of the programming. We also have after school homework and mentoring at the family complexes. We will continue to survey mixed finance solutions along with other options to address the funding shortfalls from the Capital Fund Program and recapture of operating funds.

- Asset Management has been fully implemented. We continue to request more Section 8 Vouchers as a continuum along with repositioning funds available to the WHA.

Promote a positive environment that encourages staff development, participation and well-being:

- Explore the possibilities of community service for WHA staff, formalize the process, and recognize the contributions.
- Evaluate WHA's staffing needs.
- Provide ongoing computer, customer service, subsidized housing, real estate finance and professional development training opportunities for staff
- Cross- training where appropriate.
- Develop a job-shadowing/knowledge exchange program to allow employees to learn about and develop respect for other departments within the WHA
- Consistently and fairly administer corrective employee action as necessary.
- Perform annual employee evaluations for all staff.
- Empower employees to become involved in the decision-making process by continuing to establish committees.
- Promote website access to produce any internal and external informative, a user-friendly site that is reflective of the work of the WHA.
- Train supervisors in good management skills.
- Continue a process for policy updates and dissemination.
- Our staff is well aware of the community services available in the area for recommendations to clients and often volunteer for many of the services in the area. Cross training is emphasized and on-going for promotion opportunities through professional agencies. Under Asset Management staff is fully engaged in the operational process to the largest extent possible. All of our policies have been codified on our website for both staff awareness and clients for open Asset Management.

<p>2. If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance</p>

The PHA is not designated as a troubled PHA.

AP-65 Homeless and Other Special Needs Activities

91.220(i)(1)(i-iv)Homeless and Other Special Needs

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

The City of Woonsocket recognizes, along with other CHF partners that homelessness is a state-wide issue solvable only by state-wide cooperative efforts.

To lessen the need for emergency and transitional housing, the City recognizes the value of preventing homelessness. Emergency Solutions Grant funds will support the retooling of the Crisis Response by providing limited dollars for prevention. Community Care Alliance has received funds to divert those at risk of homelessness with cash assistance and intensive case management. 32.5% of ESG funds are utilized for rapid re-housing for those who are in shelter and need cash assistance and case management to sustain housing. Road Home Emergency Housing Assistance (RHEHA) (Rhode Island Housing funded) will continue to assist families and individuals who are at risk of homelessness, particularly for those who are renting. Funding for this resource has been cut, but it is anticipated that approximately over 300 clients have been assisted in 2018 with funds to remain in their housing or to move to more appropriate housing. Homelessness prevention is required even for those that own their homes. In 2017, foreclosures at a state level have decreased to 42% from the previous year. The City of **Woonsocket** saw a **decrease in foreclosures by 96% (2nd best in the state)**. Low wages, decreasing property values and persistent unemployment continue to put many in a precarious ownership position.

Addressing the emergency shelter and transitional housing needs of homeless persons

Even with the steady reduction in the unemployment rate, the State continues to strain the emergency shelters and transitional housing as a temporary solution for those who find themselves without housing. The goal is to reduce the number of persons and families requiring the use of these beds, but with the onset of winter there is always an increased need. As part of the implementation of Opening Doors Rhode Island (a state-funded program) a crisis response committee has been created to have the state's response to families and individuals in need of temporary shelter to be respectful, helpful and provide the best solution for the household's circumstances. Consultants have been hired to help develop the coordinated assessment, and families in need of shelter now only need to call 211 to find assistance in locating immediate shelter. The continuum's successful winter planning includes close communication and coordination between street workers and shelters to make sure no one spends a night unsheltered in severe weather. The need for transitional housing continues due to the large discrepancy in Rhode Island between the cost of private housing and wages.

The number of transitional housing units will remain stable as those who have employment, but not sufficient income, wait for subsidized housing. With no wait list for the HCVP open in the state, deeply subsidized housing opportunities remain very scarce.

In accordance with program regulations published relative to the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH), as amended, the CHF Partnership will distribute funds to private nonprofit organizations for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, and for homelessness prevention and rapid re-housing activities.

The total amount that may be used for essential services and emergency shelter cannot exceed 60% of the fiscal year of FY 2019 grant funds committed for homeless assistance activities.

Any building for which emergency shelter grants are used for rehabilitation must be maintained as a shelter for the homeless for not less than a three year period or for not less than a 10 year period if the grant amounts are used for major rehabilitation or conversion of buildings. If funds are used for the provision of services, maintenance or operating costs, the building must continue to be used as shelter for the duration of the grant agreement.

Through consultation with client level data in HMIS and annual Point in Time counts, the importance of continued support of emergency shelters was realized. Last year over 4,200 persons utilized an emergency shelter statewide. While emergency shelters are not the ideal destination for any family or individual, they provide a needed emergency response, when no other resources are available (HPRP, family/friends, transitional housing, etc). During the input sessions providers reinforced the demand for operation expenses associated with emergency shelters.

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

The lack of permanent, affordable housing is the largest gap faced by persons experiencing homelessness, as well as the low-income community in general. The top strategy being pursued to ensure that homeless individuals make the transition to permanent housing and independent living, is prioritizing safe and stable housing and making affordable housing options more accessible to homeless individuals. The CHFP operates on the premise that this issue requires a state-wide response and state-wide resources. ESG funding provides for rapid re-housing assistance.

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

To lessen the need for emergency and transitional housing, the City recognizes the value of preventing homelessness and addressing the housing and supportive service needs of persons who are not homeless (elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with alcohol or other substance abuse problems) Emergency Solutions Grant funds will support the retooling of the crisis response by providing limited dollars for prevention. Community Care Alliance has received funds to divert those at risk of homelessness with cash assistance and intensive case management. The portion (32.5%) of ESG funds are utilized for Rapid Re-Housing for those who are in shelter and need cash assistance and case management to sustain housing. Road Home Emergency Housing Assistance (RHEHA) (Rhode Island Housing funded) will continue to assist families and individuals who are at risk of homelessness, particularly for those who are renting. Funding for this resource has been cut, but it is anticipated that approximately 300 clients will be assisted will be assisted with funds to remain in their housing or to move to more appropriate housing. Homelessness prevention is required even for those that own their homes. Foreclosures have decreased over the last year in Rhode Island. Low wages, decreasing property values and current unemployment put many residents in a precarious ownership position.

AP-75 Barriers to Affordable Housing

91.220(j) Barriers to Affordable Housing

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

A Planning Study “Affordable Housing for Rhode Island: Goals for Cities, Towns and Regions to *Build their Economy, Help their Neediest Neighbors, Support their Workforce & Grow Smart Ideas*” was conducted for NeighborWorks Blackstone River Valley (NWBRV) and the RI Housing Network. The report was made possible through the financial support of: The Rhode Island Foundation [www.RIFoundation.org] & The Fund for Community Progress [www.FundCP.org]. In the report, the City of Woonsocket was ranked as making an exemplary community effort to 1) create new affordable housing productions to meet household and economic growth since 2010; 2) create new market rate housing production to meet household and economic growth since 2010; and 3) Closing severe affordability gaps to help our neediest neighbors.

The Housing Resources Commission is committed to providing housing opportunities for all Rhode Islanders, maintaining the quality of housing in Rhode Island, and coordinating and making effective the housing opportunities of the agencies and subdivisions of the State. They solicited applications for Building Homes RI (BHRI) Neighborhood Opportunity Program (NOP). Priority will be given to projects that include acquisition and/or rehabilitation of foreclosed properties.

Capital funds will be awarded to provide resources to finance the creation of affordable homes and apartments through Building Homes RI.

NOP operating funds will be awarded to assist in the operation of rental housing affordable to households/individuals working at or near minimum wage as part of the Family Housing Program, and to assist households for very low income individuals and families who have a determination of disability and who are homeless or at risk of being homeless as part of the Permanent Supportive Housing Program.

The Affordable Housing Crisis in Rhode Island

Affordable Housing is a statewide issue trying to be solved on both a statewide and more local level. The following is an excerpt from the State Consolidated Plan:

Land Cost/Availability

A basic impediment to affordable housing in Rhode Island is its compact size of 1,045 square miles, and the limited availability of public water and sewer. The limits to the amount of easily developable land contributes to the fact that approximately 45% of the cost of a new home in Rhode Island is attributable to land acquisition and infrastructure—as opposed to 34% nationwide. Even with the state’s recent drop in home prices due to the foreclosure crisis, development and land costs remain a significant impediment to the development of affordable homes.

While many municipalities have formerly industrial sites that have sat idle for years, the costs for brownfield assessment and remediation makes converting these structures to affordable housing a challenge. Moreover, given the contamination that may be involved in a brownfield site and the fact that many of these sites are located in lower-income urban

communities, it is important that any brownfield site redeveloped as affordable housing meet all applicable state and federal environmental standards and that the developer follow all public notification and participation procedures required under Law, which adds to the cost and time required for development.

Limited Funding

One of the greatest obstacles to eliminating the cost barriers to affordable housing is the limited availability of federal and state resources. Rhode Island maximizes these limited resources by working with other stakeholders and leveraging all sources of funding. However, given the number of households who cannot afford current housing costs and the size of that affordability gap, there is simply not enough funding available to meet the state's needs. The current economic downturn has exacerbated this problem by further widening the gap between what housing costs and what households can afford and pushing many families and individuals who may have previously been able to afford their housing costs, into housing crisis. Even as new funding sources like the National Housing Trust Fund become available, state resources such as the housing bond and NOP are threatened by the state's dire economic situation.

Recent changes to the state's Low and Moderate Income Housing Act provided municipalities with the authority and incentive to subsidize the development of affordable homes through density bonuses, fee waivers and other tools. To date, ten Rhode Island communities have utilized this authority to create 109 affordable units. These changes also expanded development capacity in the state by attracting for-profit developers, whereas most affordable housing development is being carried out by non-profit community development corporations with often limited capacity and geographic focus. However, the current turmoil in the housing and financial markets is likely to dampen both the effectiveness of these subsidies and the interest of for-profit developers for several years.

Zoning and Land Use Regulations

One of the most often cited barriers to development of affordable homes is the state and local regulatory framework that makes the process expensive and time consuming. The State's Constitution grants municipalities the right to determine the manner in which they develop their land, and many recognize the importance of having land-use laws to facilitate the development of housing for persons of different economic means. However, many of Rhode Island's suburban and rural municipalities have instituted "large-lot" zoning policies that relegate much buildable land to parcels of one-half acre or larger, with a large percentage of these parcels zoned for two acres or more. This zoning reduces the number of buildable parcels, which in turn increases the cost of development. Additionally, many municipalities do not permit zoning by-right for multi-family housing and have stringent land-use policies that forbid the mixing of commercial and residential uses. In effect, this split has served to further segregate the state's highly diverse population along urban-suburban and exurban lines. Further exacerbating this split is the limited availability of public transportation outside of the commercial core. Many of the historic villages that are considered some of Rhode Island's most scenic and popular places could not be replicated in most communities today due to the existing zoning and land-use controls. Both of these issues not only further complicate the costs for the developer, but they also serve to limit housing choices and convenient locations for those who are seeking housing.

A number of Rhode Island municipalities continue to use growth caps as well as added various fees and charges to the development process. In an effort to manage what they cite as the harmful impact of unsustainable growth, particularly with regard to their local schools, growth caps limit developments in some municipalities to as few as 20-25 building permits per year, divided evenly per quarter sometimes requiring builders to wait 3-6 months before proceeding on their permit to build.

Impact fees are charged for each newly constructed unit to cover the cost of increased services, including schools and recreation facilities. In 2000, Rhode Island passed legislation enabling cities and towns to impose impact fees and creating a standardized process for municipalities to calculate the amount of the fee based on the potential impact that additional residential development will State of Rhode Island have on the municipality's ability to provide services. The impact fees can range from a few hundred dollars to almost \$8,000 per unit. The Rhode Island Supreme Court acknowledged, in a decision addressing an appeal from a State Housing Appeals Board decision, that "...the imposition of these (impact) fees upon low and moderate income housing initiatives may have a deleterious effect on the development of affordable housing in the community."

The Housing Act of 2004 required every municipality in the state that had not yet achieved its 10% affordable housing goal to develop an affordable housing plan to identify how the community will achieve that goal. Many towns proposed revising zoning ordinances to allow for denser development, especially in their town centers, or permitting density bonuses in new subdivisions. However, while some communities have implemented their proposed zoning changes, and fee and growth cap waivers, most have not.

As of 2008, most of the communities have moved forward on at least some ordinance changes that could reduce barriers to development. However, many more strategies that were identified in the affordable housing plans have not yet been implemented.

Building Codes

Building codes are necessary in order to assure quality structures that are free from defect and assure the health and safety of occupants. They also provide consumer protections for buyers of real estate. However, they also add additional cost to development. Fire codes and historic preservation requirements in particular are often identified as contributing to significant cost increases, development delays and design challenges. The State has also taken other steps to reduce barriers to affordable housing development. It has revised its building code language regarding housing rehabilitation, following the New Jersey model, to allow developers to rehabilitate older buildings without having to meet all currently mandated fire and building safety codes. The State is currently in the process of adopting the International Rehabilitation Code.

Return on Investment

Market forces are the primary determinant for a developer's ability to maximize his/her return on investment (ROI). However, a number of the cost factors and regulations cited above have been cited by developers as adversely affecting their ROI. Some of the strategies towns are adopting to encourage the development of affordable homes may have the opposite effect if they are not accompanied by incentives adequate to offset the costs for the developer. For example, many communities have adopted inclusionary zoning ordinances as part of the implementation of their affordable housing plans. However, some developers have argued that the density bonuses and other incentives included in the ordinance are not sufficient to offset the additional cost to the developer of building the affordable units.

As stated above, the current instability in housing and financial markets is also a significant barrier to the development of affordable homes, particularly by for-profit developers. Development financing is now much more difficult to secure and the price potential purchasers or renters are willing or able to pay for housing is still very much in flux.

Political and Institutional Responses to Affordable Housing

In an effort to facilitate production, Rhode Island first passed its Low and Moderate Income Housing Act (RIGL45-53) in 1991. The Act established a local comprehensive permitting process and the right of appeal to a State Housing Appeals Board that could be used by non-profit developers building subsidized rental and for-sale units affordable to low and moderate income households and by for-profit builders developing subsidized rental units.

In 2002, the Low-Mod Act was amended to extend the eligibility to use comprehensive permitting to for-profit builders proposing for-sale (home/condo ownership) developments with at least 20% of the units subsidized and affordable to low and moderate income households.

Subsequently, many communities received comprehensive permitting applications from developers proposing large projects with major density increases over current zoning. Citizens and municipal officials voiced strong concerns that towns had lost local control over zoning and that the proposed projects presented threats to the environment and to community character.

Early in the 2004 General Assembly session, the Senate and the House passed a moratorium on for-profit applications seeking to use the comprehensive permitting process. The Senate and House jointly studied the issue and drafted legislation in response to input from many sources. Their efforts resulted in unanimous passage of the 2004 Rhode Island Housing Act. The Act amended a number of different state laws to establish five main reforms:

- A requirement that every municipality that has not reached the 10% level of subsidized units or the rental unit alternative produce a plan by December 31, 2004 to show how it proposes to reach 10%.
- A requirement that the Housing Resources Commission and the Statewide Planning Program develop a state strategic plan for housing production that is adopted by July, 2006.
- Provisions for dealing with for-profit applications affected by the moratorium.
- Establishment of two commissions:
 - A Housing and Conservation Trust Study Commission
 - A Housing Act Implementation Oversight Commission.

The large percentage of multifamily houses makes it difficult to buy and maintain the properties. Homeowners, especially the elderly, face difficulties in paying for a home on a limited income.

The private sector cannot be expected to revive the city's housing market. Investors who tried to leverage capital against the equity on their property have found themselves in financial trouble because they took their action with the belief that rents would rise.

The City's housing programs help alleviate barriers to affordable housing. Additionally, the CDBG funded public services all work toward client self-sufficiency and independence.

Working with other housing-related agencies such as Navigant Credit Union, RI Housing, the Housing Network, Habitat for Humanity West Bay/NRI, NeighborWorks Blackstone River Valley (NWBRV), and private developers, the City continues to leverage housing funds and overcome housing barriers. The City is working with the other 5 entitlement communities, the State and RI Housing on a new Fair Housing Study.

Analyzing the Status of Fair Housing & Overcoming Impediments

In 1996, the city conducted an analysis of impediments to fair housing choice. Since that time, the city has carried out actions to overcome the effects of the identified impediments.

Impediments is defined by HUD as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restricts housing choices or the availability of housing choices of these protect classes.

The term "fair housing choice" means: the ability of persons of similar income levels in the same housing market area to have a like range of choice available to them regardless of race, marital status, color, religion, ancestry, sex, sexual orientation, disability, national origin, or arbitrary characteristics, such as a wage or sources of income.

The City has reviewed the policies, procedures, and practices within the city that affect the location, availability, and accessibility of housing and current residential conditions related to fair housing choice. Specifically, the City examined the new, relevant demographic information and data; sources of authoritative studies of housing discrimination, lending, and other fair housing issues; methods for obtaining diverse citizen participation in the development, implementation, and evaluation of fair housing planning; and correction actions and solutions. Information from the RI Kids Count Factbook in March 2019, provides important areas to review when looking at impediments to fair housing.

There are no court orders or consent decrees that affect the provision of assisted housing or fair housing in the City of Woonsocket.

There have not been any fair housing complaints of compliance reviews where the Secretary of HUD has issued a charge of or made a finding of discrimination.

No citizen fair housing complaints have been received by the City during FY 2017-2018 or during the first half of FY 2018-2019.

The City continues to include fair housing statements in all program material. The City website includes a link to the Rhode Island Human Rights Commission and RI Legal Services.

The City recognizes its growing minority population. It pledges that all of its programs will include proactive, positive, and inclusionary efforts to promote housing choice in all areas of the city. As with other RI municipalities, the City looks to the state for guidance.

The state's Low- and Moderate-Income Housing Act (LMIH) provides that each municipality should aim for at least 10 percent of its housing units as long-term affordable. Currently, the state reports 8.3% (37,157 affordable units) of the total housing stock to be low/mod. Woonsocket's affordable housing-to-total housing unit ratio is at 15.9% (3047 affordable units), is the highest percent in the state.

The Housing Resources Commission (HRC) completed "The Rhode Island Five Year Strategic Housing Plan: 2006-2010" with the approval of the document in January 2006. This followed a year of intensive work with ABT Associates, the consultants who had been selected to write the plan, and a large representative group from within the community. In June 2006, the plan was approved by the State Planning Council and became the state's official Guide Plan for housing. The plan includes the following guiding principles:

- **Preserve Assets** -- Preserve the character of Rhode Island's communities, open space and natural resources by promoting compact development in growth centers, towns and villages.
- **Minimize Costs** -- Address the escalating cost of housing by reducing regulatory barriers and increasing density, where appropriate, and maximum use of existing infrastructure.
- **Promote Economic Development** -- Support the workforce by providing housing at all price points for workers. This includes developing new housing as well as preserving existing housing resources.
- **Encourage Diversity** -- Encourage the development of economically and racially diverse and accessible communities to provide geographic opportunity to households at all income levels.
- **Target Populations** -- Focus the strategic plan and the state's resources for the next five years on safe, healthy, and affordable housing for families, small households, the homeless, and the disabled based on population projections.

The HRC Office of Homeownership's purpose is to promote homeownership for low- and moderate-income households, especially those Rhode Islanders traditionally underserved. The Office is charged with: addressing a range of issues in the home selection and buying process; eliminating housing discriminatory practices such as predatory lending, home improvement loan abuses, insurance abuses, and access to credit; encouraging practices and policies to foster homeownership retention through foreclosure prevention and counseling. The Office works with various housing partners to encourage and create homeownership opportunities in Rhode Island.

- **Homeownership Connection:** Since 2000, the Homeownership Connection administered by the Housing Network of Rhode Island has served over 11,000 households; 7,000 completed a homebuyer education certificate and 2,700 went on to close on their first home.
- **Passage of the Home Loan Protection Act:** Staff participated in the release of the joint commission chaired by Senator Juan Pichardo and Representative John McCauley to study the issue of predatory mortgage lending practices in the state (<http://www.rilin.state.ri.us/Documents/PredLending.pdf>), which resulted in passage of the RI Home Loan Protection Act. Currently, RI has joined over two dozen other states with specific laws to combat predatory lending.

- **Predatory Lending:** With RI Housing and the Homeownership Connection, the staff continued our participation in the “Don’t Borrow Trouble-Rhode Island” Campaign to educate and inform the public about responsible lending and abusive practices and to provide access to direct advocacy/counseling/legal assistance to at-risk homeowners. An Alternative Lending Product Working Group was formed to create a rescue mortgage product to assist at-risk homeowners with an alternative refinance mortgage.
- **Foreclosure Prevention:** The Office partnered with the Homeownership Connection to form a Foreclosure Prevention Committee. Staff provided direct foreclosure prevention advocacy to 106 families facing foreclosure or being evicted due to foreclosure. Since 2000, the Office has assisted 671 families across Rhode Island. The Office is working with RI Housing on the implementation of the “Madeline Walker Act of 2006” which reformed the practice of risk related to equity loss for households’ facing foreclosure because of real estate, water or sewer lien sales. Staff were trained for a “Training for Trainers” foreclosure prevention program in April 2006. Attended the National Foreclosure Prevention Symposium in Washington, DC as well as the initial meeting of the New England Housing Sustainability Group looking at a regional partnership to reduce foreclosures.
- **RI Hardest Hit Fund:** Administered by Rhode Island Housing, HHFRI assists homeowners facing foreclosure with a statewide allocation of \$79,358,830. As of April 23, 2012, some 1,801 loans have been approved totaling \$27.2 million. HHFRI has closed nearly 1,500 loans to struggling homeowners accounting for \$21.6 million with roughly \$52 million remaining. The funds were budgeted on a statewide, first-come/first-served basis. The program was made available to homeowners in Woonsocket on November 15, 2010 and was re-established/re-opened in February of 2016 for 10 communities in Rhode Island, including Woonsocket.
- Since the program was introduced statewide (December of 2010), nearly 5,500 homeowners have been screened and registered for assistance loans. As of March 31, 2016, more than 3,099 families and individuals have been approved for over \$59 million in HHFRI funds. The program ended in December of 2016 and to date no more applications have been accepted since all remaining funds were allocated to approved applicants.
- Currently RI Housing has implemented a first time homebuyer program (Renewed Homes Program) targeting foreclosed properties in ten (10) communities including Woonsocket
- Woonsocket ranks 5th statewide in registrations for HHFRI assistance loans behind Providence, Warwick, Cranston, and Pawtucket respectively.
- Marketing methods, other than press release and website post, included:
 - running print and outdoor advertisements for the program statewide
 - customized Community Meetings advertisements in the local papers when Community Meeting in the local publication's community is scheduled.
 - a website - www.hhfri.org - and a Facebook page - Hardest Hit Fund RI.
 - Community Meeting listings on local media outlets' online community calendars and an HHFRI E-News, which is e-mailed regularly to partners.

Borrowers may qualify if:

- They own a 1- to 4-family home or a condominium, live in the building and do not own other real estate.
- Their gross annual income is less than \$89,280, if there are 1 or 2 people in their home; or less than \$104,160 for a household of three or more.
- Their monthly mortgage payments, including taxes and insurance, are greater than 31 percent of their gross monthly income.
- They have no financial resources of their own (except for the greater of three monthly mortgage payments or \$5,000 in savings) and have already used all available bank or government assistance programs. They can have any amount in a retirement account such as a 401k or an IRA.
- They have a documented financial hardship that has affected their ability to make their mortgage payment, such as:
 - unemployment or underemployment;
 - death or disability of a key wage-earner;
 - unforeseen medical expenses;
 - costly home repairs as a result of the recent flooding in Rhode Island.
- **note:** a loss of home value alone does not constitute a financial hardship.
- **Homeowners Insurance:** The Office has continued its policy work with regard to use of credit scoring and access to affordable homeowners insurance in low and moderate-income communities.

AP-85 Other Actions

91.220(k) Other Actions

Actions planned to address obstacles to meeting underserved needs

Woonsocket identifies closely with the state obstacles as cited in the State of RI Annual Action Plan 2018. The lowest-income and other special-needs populations do not appear to have vastly different circumstances community to community. The geography of the state allows for state-wide problem-solving conversations and initiatives.

That being said, the need for funding continues to be the most significant obstacle to meeting underserved needs in the state. There was a \$50 million affordable housing bond that was approved by voters in 2016 which will have a positive impact, but additional state and federal resources are needed to meet the state's affordable housing needs.

Beyond the needs for funds, however, are the programs discussed in the 2015-2019 Consolidated Plan that discuss the needs of the underserved populations in the state, including veterans and those re-entering society from prison. While the state seeks to assist approximately 60 veterans achieving housing in the coming program year, it has no numeric goal for re-entry housing. However, the state continues to convene the Governor's Steering Committee on Prisoner Reentry on which numerous state agencies, including Rhode Island Housing.

Beyond these specific groups, the state also continues to struggle with fully meeting the needs of its lowest-income and other special-needs populations.

Actions planned to foster and maintain affordable housing

The City's approach to meeting housing needs is based in the philosophy that home ownership is the preference and the low to moderate-income families often need assistance in achieving this American dream. The City also encourages neighboring communities to develop potential units to create a balance of rental; government subsidized, and privately owned properties. Tenant-based rental assistance and mortgage refinancing are not part of the City's federally funded housing programs. Pertaining to Federal rental assistance/affordable housing, the City of Woonsocket has the second highest number (3047) and the highest percentage (15.9%) of affordable housing units in the state.

The City is pleased to be able to offer affordable units to the most disadvantaged families; however, the City also realizes that community development requires a balancing of housing types. Therefore, the City will continue to direct energy, funding, and focus on housing development that results in homeownership versus rental and/or "subsidized" housing.

The City has identified three primary activities that meet the need, address the objectives, and move the City closer to the goal of sufficient, safe, and affordable housing. The program descriptions cover a one-year period.

1. First-time homebuyer assistance
2. Code-related repair and lead hazard control cost assistance to lower income homeowners and owners of affordable rental properties
3. Development of affordable housing through community housing development organization initiatives.

The City's "First-Time Homebuyer" down-payment assistance program provides qualified first-time Woonsocket home buyers with a loan in the amount of up to \$5,000 to assist with down payment and an additional \$150 for a program-required visual assessment/inspection fee. The no-interest loan will be **partially forgiven** (\$2,500 after 5 years) and partially deferred (\$2,650). The deferred loan includes the \$150 program-required visual assessment/inspection fee. Repayment of the deferred loan is made at the time of sale, exchange or transfer of title. No portion of the forgivable portion will be prorated prior to expiration of the affordability period.

The City's repair program provides Up to \$15,000 per unit (\$60,000 maximum) to owners of owner-occupied affordable rental properties. Affordability is determined by occupant income and rent limits. For single-family low to-moderate income homeowners, the City provides up to \$25,000 for code-related and lead hazard repairs.

For low to-moderate income owners, the assistance will be in the form of a no-interest 50% forgivable and 50% deferred loan. The deferred portion of the loan is repayable when there is a sale, change, or transfer of title. The forgivable portion of the loan is forgiven after the affordability period expires. The affordability period is the period of time to which the owner agrees to maintain affordable units.

For investors and nonprofit investors of affordable rental units, the assistance will be in the form of a no-interest, deferred loan. The deferred portion of the loan is repayable when there is a sale, change, or transfer of title.

Within the repair program, the City's approach is one of energy efficient rehab and or coordination of other resources to increase energy efficiency and or weatherization of homes.

The "Affordable Housing" loan requirement is monitored annually by City staff. The process includes an assessment of tenant income eligibility and other lease requirements, as well as an on-site physical inspection for code compliance. After the initial inspection, inspections occur **every third year**.

Actions planned to reduce lead-based paint hazards

The City of Woonsocket has had frequent communications with the RI Department of Health (DOH). We share information on housing units with lead hazards and reported cases of elevated blood lead levels (EBLs). The most recent information indicates DOH had identified 29 housing units in Woonsocket with lead hazards with reported cases of EBLs being treated by health care providers. However, 87.4% all housing in Woonsocket is pre-1979. The level of lead hazards has seen a reduction, identified by DOH data, even though DOH's numbers for housing with lead hazards are in response to complaints only. Supporting this assumption is data from RI Kids Count 2019. RI Kids Count, a children's policy organization, states that the percentage of children with confirmed blood lead levels ≥ 5 mcg/dL was **4.4%** of all Woonsocket children tested for lead poisoning and entering kindergarten in the Fall of 2019, compared to 6.0% for children entering kindergarten in the Fall of 2008 and 15% for 2001.

The City of Woonsocket, RI Dept of Health, RI Housing Resources Commission, Childhood Lead Action Project, NeighborWorks Blackstone River Valley, RI Housing, and multiple cities and towns across RI have been meeting regularly to discuss process and protocols to evaluate and control lead hazards in residential properties and decrease the number of EBL properties in our communities. Lists of certified lead abatement contractors are posted on the State website along with certified renovator/remodelers and inspectors.

In Rhode Island, identification of a child as significantly lead poisoned requires that a lead inspection of the child's home be offered. The Department of Health sends certified lead inspectors to determine whether lead hazards are present and to work with property owners to make the property lead-safe.

In early 2003, three additional lead centers were certified by the Center for Child and Family Health at DHS. Certified Comprehensive Lead Centers provide a comprehensive package of services to lead poisoned children and their families, including non-medical case management, education, advocacy, window replacement and spot repair, referrals, support and assistance with housing.

The Lead Poisoning Prevention Act, as amended in the Lead Hazard Mitigation Act of 2002, is designed to prevent lead poisoning in children and pregnant women. Under this Law, the RI Department of Health's Environmental Lead Program must maintain certain public lists in order to alert the public about rental properties that pose a high risk for lead poisoning. The Lead Hazard Mitigation Act strengthens requirements and penalties for timely abatement by landlords, requires timely referral for prosecution in the event adequate abatement is not undertaken, and creates tenant remedies to enforce the provision of the Act through agency intervention or privately-initiated court action. The three public lists, mandated by §23-24.6-23 Compliance and Enforcement, include:

1. Highest Risk Premises: Properties declared unsafe for habitation by children under age six (6).
2. Properties with Multiple Poisonings: Properties that have been the source of multiple lead poisonings and are not currently lead safe.
3. Owners of properties that have been cited with a 2nd Notice of Violation due to ongoing lead hazards.

Additionally, in regard to lead hazard control work, the State of RI has stringent laws covering safe work practices and occupant safety.

On March 26, 2007, David Gifford, MD, MPH Director of Health RI DOH, submitted the Environmental Lead Interagency Coordinating Council Report on Lead as required by the Lead Hazard Mitigation Law to RI Governor Carcieri. Since lead hazard awareness and control is a state-wide effort involving many partners and resources, the City includes Dr. Gifford's report in its entirety (this is the most recent information available):

Keeping property owners and tenants informed about the requirements of the Lead Hazard Mitigation Law

The Housing Resources Commission and its partner agencies have worked tirelessly throughout 2006 to ensure that property owners are aware of their requirements under the law. The additional staff hired by the Housing Resources Commission through its HUD Lead Outreach Grant have greatly aided in assisting property owners and tenants and ensuring quality technical assistance and customer service to Rhode Islanders.

By the close of 2006, over 22,500 property owners had taken the three-hour Lead Hazard Awareness Seminar. This number is well over the goal of training 9,900 property owners between the periods of 2004-2007 as outlined in the Comprehensive Strategic Plan. There are currently 30 organizations that are certified to offer the Seminar. These organizations are providing classes that range from no cost to fifty dollars (\$50).

Rhode Island continues to make great strides to make the Lead Hazard Awareness Seminar available to property owners through a variety of media and languages. Classes are now available to the public on DVD. The Seminar ran on Cable and Public Access in March and June 2006, and is scheduled to run during 2007 as well. DVD's are available for sale and online classes continue to be offered. In-person classes are available in the following languages: English, Spanish, Cambodian, Vietnamese, Laotian, and Hmong. The Housing Resources Commission and the Department of Health have continued to collaborate on a series of public awareness campaigns to inform property owners and tenants about the law. In 2006, the public awareness campaigns ran in July and August and included TV spots in English and Spanish.

The Housing Resources Commission, in coordination with the Department of Health, has developed a protocol to respond to tenant complaints regarding units that are not in compliance with Lead Hazard Mitigation Regulations. Standardized forms have been developed to assist tenants in providing landlords with the required notification of lead hazards on their property. If the property owner does not respond to the complaint in a manner that is satisfactory to the tenant, the tenant can issue a formal complaint to HRC. After reviewing the complaint, HRC will determine the appropriate response based on the conditions in the unit and tenancy of at risk residents.

Property owners and tenants have also been informed through the following efforts:

- *More than 350,000 booklets/fact sheets on the Lead Hazard Mitigation Act and lead information have been distributed to landlords and tenants.*
- *Over 6,000 individuals have been assisted through the HRC telephone hotline.*

Efforts will continue in 2007 to ensure that both property owners and tenants are aware of their rights and responsibilities under the law. However, HRC's HUD Lead Outreach Grant, the only source of funding for the Lead Technical Assistance Center and all its outreach and education activities, is not being renewed. Starting July 2007, HRC's staff and outreach capacity will be greatly impacted, creating a setback for the Lead Hazard Mitigation Act implementation.

Certificates of Conformance

The Department of Health has 221 certified Environmental Lead Inspector Technicians and 49 certified Lead Inspectors to perform comprehensive, limited, and mitigation inspections.. These professionals continue to issue Certificates of Conformance to property owners across the state. To date, 10,926 rental units have proactively received Certificates of Conformance, 2,003 of which have Presumptive Compliance. That is in addition to the 1,356 Lead Safe Certificates and 35 Lead Free Certificates that were issued in 2006.

[According to the RI Housing Resources Commission website, as of April 2010, 1250 Woonsocket properties have received Certificates of Conformance].

There are currently two training providers licensed to conduct the 24-hour Environmental Lead Inspector Technician course, one training provider licensed to conduct the 40-hour Environmental Lead Inspector course, and two training providers licensed to conduct the 8-hour annual refresher training necessary for inspectors and inspectors technicians to renew their license as lead professionals.

Property owners' information

The public list requirements of the Lead Poisoning Prevention Act, as amended, (Highest Risk Properties, Properties with Multiple Poisoning, Second Notices of Violation Listing) are maintained on the Department of Health website. The "highest risk properties" list is updated as information changes, and the other lists are updated monthly or more often if needed. Organizations such as the Lead Hazard Reduction Programs utilize these public lists to encourage property owner participation in funding opportunities to abate lead hazards. The Department of Health also shares Lead Safe and Lead Free Certification data with the Housing Resources Commission. The Housing Resources Commission plans to have a search engine available by April 2007 so that the public can access information on rental units that have achieved compliance under the Lead Hazard Mitigation Act.

Lead Hazard Reduction

There are currently five Lead Hazard Reduction Programs in Rhode Island offering low or no-interest loans to property owners and/or landlords/investors in order to make their housing unit(s) lead-safe. These programs have played a large role in improving the safety of housing units in Rhode Island communities.

Insurance companies' lead liability policies

The Department of Business Regulations promulgated Insurance Regulation 101, effective on April 8, 2003, to establish a uniform policy regarding lead poisoning coverage in pre-1978 residential rental property and to set forth requirements to assure the availability of insurance coverage for losses and damages caused by lead poisoning. Following the promulgation of Insurance Regulation 101, the Department issued Insurance Bulletins #2003-9, #2003-13, #2003-17, #2004-1, and #2005-6 to address issues that arose out of consumer complaints and miscellaneous inquiries relating to the insurers' issuance of lead liability coverage in Rhode Island. In order to implement the 2005 amendments to RIGL § 42-128.1-9 and to incorporate issues that have been addressed by bulletins since the initial enactment of RIGL § 42-128.1-9, the Department amended Insurance Regulation 101 effective October 17, 2005.

Insurers are required to file Annual Reports with the Insurance Division on February 1, 2007 regarding insurance coverage for pre-1978 rental properties in Rhode Island. The reports are designed to determine which insurers are writing the coverage and how many insured are purchasing the coverage. The Department is currently compiling the data in those annual filings, which it will share with the Coordinating Council and include in the next annual report.

Exterior Lead Paint Removal Certification Program

The Department of Environmental Management's activities in Exterior Lead Paint Removal take place in two areas:

Exterior Lead Paint Removal Certification Program - administered by the Office of Technical & Customer Assistance (OTCA), the program involves self-certification by exterior painting contractors

of compliance with DEM Air Pollution Control Regulation # 24 (Removal of Lead Based Paint from Exterior Surfaces), and with the federal Pre-Renovation Education Rule, and related activities.

Enforcement of DEM Air Pollution Control Regulation # 24 - For the most part, enforcement of this regulation is administered by the Office of Compliance & Inspection, with involvement of the Office of Air Resources with some specific requirements in the regulation.

Activities conducted by staff from the Office of Technical and Customer Assistance:

- *Set up a Lead program display and participated in a Pro Show for painters on April 20th, with 150 persons attending*
- *Conducted two (2) compliance audits of jobs performed by participating exterior painting contractors*
- *Distributed outreach materials throughout the year, including Exterior Lead Paint Removal Certification Workbooks and Checklist Packages, Exterior Lead Paint Removal Program Fact Sheets, Pre-Renovation Education Rule documents such as the pamphlet "Protect Your Family from Lead in Your Home" and the Lead-Based Paint Renovation Education Rule handbook for contractors, property managers and maintenance personnel, and Lead Poisoning Prevention Resource Guides*
- *Handled telephone and email requests for information throughout the year, including information about the certification program, Air Pollution Control Regulation # 24, other exterior renovations involving Lead, such as siding and window repair and replacement, disposal inquiries, the federal Pre-Renovation Education Rule, and the RI Lead Hazard Mitigation Law.*
- *Twenty-three (23) exterior painters contractors began participating in the program, and certified to compliance with the applicable regulations*
- *As of December 31, 2006, forty-four (44) exterior painters contractors were participating in the program, and had certified to compliance with the applicable regulations*
- *Maintained current information and made additions on the RI Exterior Lead Paint Removal Program webpage on DEM website in April, found at <http://www.dem.ri.gov/programs/benviron/assist/extlead/index.htm>*

Enforcement actions include:

135 *Lead Paint Related Complaints Received*
112 *Lead Paint Related Complaint Investigations*
129 *Lead Paint Complaints Addressed by Investigations*
28 *Investigations where Violations were found*
28 *Lead Paint Re-inspections*
21 *Informal Enforcement Actions*
18 *Sites Verified Clean*

Notices of Violation and Penalty, also referred to a collection agency as the administrative penalty was the only outstanding issue.

Additionally, the Department of Health receives copies of all informal and formal enforcement actions. HEALTH is also notified should we determine children may be affected by an exterior lead paint removal operation.

The Attorney General's Office fight against lead for the public health of the State of Rhode Island

On October 4, 2005, the constitutionality of the entire Lead Hazard Mitigation Act was challenged by a group of absentee landlords. Superior Court Justice Fortunato declined to enjoin the enforcement of the Act as requested. In June of 2006, the Department of Attorney General convinced the Rhode Island Supreme Court to grant certiorari to review the constitutionality of the Lead Hazard Mitigation Act.

On February 22, 2006 a Superior Court jury found in favor of the State of Rhode Island and held the Sherwin Williams Company, Millennium Holdings, and NL Industries (formerly the National Lead Company) liable for the public nuisance created by the cumulative presence of lead pigment in paints and coating on buildings throughout Rhode Island and ordered them to abate the nuisance. This verdict came after what is believed to be the longest civil jury trial in Superior Court history (four months) and after more than six years of hard fought litigation by the Department of Attorney General and outside counsel. After trial, the Defendants' moved for a new trial and the State moved for the appointment of a special master to deal with the abatement. Judge Silverstein took the post trial motions under advisement at the end of August. On February 26, 2007, Judge Silverstein issued his decision on the post trial motions upholding the jury's verdict. Judge Silverstein denied the Defendants motions for a new trial and granted the State's request for the appointment of a Special Master to facilitate the abatement. The State anticipates that judgment requiring the Defendants to abate the public nuisance will enter shortly.

In July of 2005, the State dismissed the Dupont Company from the lawsuit against the lead paint manufacturers. Dupont agreed to provide funds over several years to abate the lead from 600 units and increase public awareness and enhance enforcement of lead laws. In October of 2005, Attorney General Patrick C. Lynch announced the formation of the Attorney General's Advisory Commission on Lead Paint. The Advisory Commission spent 2006 identifying areas and drafting a proposed Lead Remediation Program to maximize the impact of the available funding.

In 2006, the Department of Attorney General closed 31 Department of Health (HEALTH) referred lead poisoning prevention cases. Presently, of the approximately 320 HEALTH referred cases since the 1990's, only 70 remain open in various stages of prosecution by the Attorney General's Office. Additionally, letters were sent to landlords relating to 68 properties that were not referred for prosecution.

Lead Poisoning in Rhode Island

Five-hundred (500) children (1.6% incidence) were poisoned (had a blood lead level equal to or greater than 10 mcg/dL) for the first time in their lives during calendar year 2006. Rhode Island is making progress toward the elimination of childhood lead poisoning; however, eliminating lead hazards in the environment is the only way to protect more children from becoming lead poisoned in the future.

Lead Centers

In 2006, the Department of Human Services continued to provide comprehensive services through its network of certified Lead Centers. A total of 132 families received comprehensive lead center services in 2006. Lead Centers assist families with a lead poisoned child through case management, education, advocacy, support, and referrals to other programs such as WIC, Early Intervention, Rite Care, Food Stamps, etc. In addition, Lead Centers replace windows and perform certain other lead abatement activities in the homes of families who meet designated criteria. In 2006, a total of 12 windows were replaced in the homes of Lead Center families. These window replacements can help reduce the risk of future lead poisoning in children who reside in these housing units.

The lack of certified contractors with the capacity to handle the magnitude of properties that require LHC, is the most pressing issue. In Rhode Island, four or five contractors are bidding all

the projects posted by government agencies. Some RI communities with LHC grants have targeted the clearance of hundreds of units. Without contractor capacity, these goals appear unrealistic.

The City will continue to take action to establish and oversee a minority outreach program to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women in all contracts entered into by the City in order to facilitate the activities of the City to provide affordable housing. The City must use certified lead contractors and the state list is the resource for the information. All contractors from the list are encouraged to apply as qualified bidders. For CDBG activities, the Federal Construction Supervisor utilizes a list provided by the RI Minority Business Enterprise on-line directory.

Program success also requires a partnership with homeowners and tenants. A successful clearance examination is the final test for project completion; however, without continued housekeeping and maintenance efforts, the threat of property recontamination is real. As a project nears completion, contractors rush to have the clearance exam. They know that a paint nick from a chair or toy, or the swelling of a wooden door or window from wet weather, can once again create a lead paint hazard and render the property unsafe.

The importance of education to tenants, owners, parents, and children is critical. Forging strong partnerships with schools, physicians, day care providers, and other public service entities is paramount to the goal of eliminating childhood lead poisoning.

The City will continue to make homes lead safe by providing lead hazard control cost assistance to lower income homeowners and landlords of affordable rental properties. Funding for this initiative comes from the HOME Investment Partnership program and the Lead Hazard Control Grant. Details of the home repair program are included under the housing section of this document.

Actions planned to reduce the number of poverty-level families

The city seeks to break the cycle of poverty and reduce the number of persons below the poverty line by developing social competence and self-sufficiency while ensuring that basic services for survival are provided. Woonsocket will assist the homeless in obtaining appropriate housing, assist those homeless, and increase and retain the affordable housing stock for low- and very low- income families.

Most activities undertaken by the City with CDBG, HOME, and ESG funds are efforts to reduce persons living below the poverty line and improve the quality of life for residents, either directly or indirectly. Programs that directly influence the poverty level include: job enrichment, development, and placement through education and economic development. Projects that indirectly affect poverty include those that upgrade the community and provide affordable housing. CDBG, HOME, and ESG funds are often used as matching funds for other grants that also reduce the number of poverty level families at risk of becoming homeless.

Actions planned to develop institutional structure

Although there is a commitment to continual process improvement, no institutional changes are required to implement the FY 2019-20 Annual Action Plan.

As outlined above, the central responsibility for the administration of the Annual Action Plan is assigned to the Department of Planning and Development (DPD). This Department continues to coordinate among public and private organizations and housing and service agencies the activities and efforts to realize the prioritized goals of the Annual Action Plan. Extensive public-private partnerships have been established and organized to address the City's housing and community development needs. The Department of Planning and Development will access, facilitate, and coordinate resource linkages and draw from the immediate sources of expertise in the community to strengthen existing partnerships and develop enhanced and sustainable collaboration.

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

Public and assisted housing providers, private and governmental health, mental health, and service agencies are participants in the network described in this document. They are also the organizations with which the City worked to develop the Annual Action Plan, and they are expected to continue active participation in the upcoming years. The City will also continue to work with neighborhood groups to address their critical issues. Through the Department of Human Service (DHS) and the City's Housing & Community Development (HCD)/Minimum Housing Divisions (MHD), the City will better serve, coordinate, and address neighborhood concerns and problems. DHS and HCD/MHD staff support the City's outreach efforts for neighborhood participation by attending neighborhood meetings, disseminating information on city programs, coordinating meetings between city staff and neighborhood leaders, and assisting with the implementation of neighborhood improvement projects.

The City's Community Development Forum brings residents, social service providers, business leaders, and city staff together to discuss critical community issues. Forums are held at least every six (6) months and 4 sessions during two (2) weeks in December. If an urgent need arises, a forum will be called to develop the best and most expeditious response.

AP-90 Program Specific Requirements

91.220(l)(1) Program Specific Requirements - CDBG

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220.(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income and carry over funds that are available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$1,950.00
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	\$0.00
3. The amount of surplus funds from urban renewal settlements	\$0.00
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0.00
5. The amount of income from float-funded activities	\$0.00
Total Program Income	\$5,000.00

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.	100.00% 70.00% min.
3. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00% 70.00% min. PY 2015-16 to PY 2019-20

91.220(l)(1) Program Specific Requirements - HOME

HOME Investment Partnership Program (HOME)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

HOME projects leverage funds from conventional lenders providing mortgages and home equity loans. Owner contribution and recaptured funds provide a contribution to affordable housing. The City is not planning to use HOME funds to refinance existing debt secured by multifamily housing.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City will use only one set of provisions per program for recapture (**resale/recapture policy**).

If a homebuyer sells their property during the period of affordability, the City will use the following objective standard that will determine “fair return on investment”:

Based on a maximum \$5,000 in HOME down payment direct subsidy assistance, the homebuyer affordability period is five years. If the assisted owner elects to sell prior to the expiration of the affordability period, the entire amount of HOME direct subsidy assistance becomes due. Only the direct subsidy is subject to recapture. The forgivable loan is forgiven in one lump sum upon the expiration of the affordability period.

However, if there are no net proceeds from the sale, or the net proceeds are insufficient to repay the HOME investment due, 24 CFR Part 92 Interim Rule revised 92.254 and clarifies that recaptures are limited to the amount of net proceeds (sale price minus loan repayment (other than HOME funds) and any closing costs)).

Rental Housing Assistance – REHAB (code-related repairs and lead hazard control cost assistance)

Homeowners must maintain a minimum five-year affordability period. If the owner elects to sell prior to the expiration of the minimum affordability period, the entire amount of HOME assistance becomes due. The forgivable portion of the HOME assistance only begins to reduce upon the expiration of the minimum affordability period. After the initial five-year period, reduction of the forgivable loan occurs on a pro-rated basis until the end of the assigned affordability period.

However, if there are no net proceeds from the sale, or the net proceeds are insufficient to repay the HOME investment due, 24 CFR Part 92 Interim Rule revised 92.254 and clarifies that recaptures are limited to the amount of net proceeds (sale price minus loan repayment (other than HOME funds) and any closing costs)).

Owner Occupied Unit Assistance – REHAB (code related repairs and lead hazard control cost assistance)

An affordability restriction will be applied in accordance with HUD standards (i.e. 10, 15, or 20 years). If an owner elects to see prior to the expiration of the affordability period, a credit will be given for the years of affordability maintained, with no minimum period required.

However, if there are no net proceeds from the sale, or the net proceeds are insufficient to repay the HOME investment due, 24 CFR Part 92 Interim Rule revised 92.254 and clarifies that recaptures are limited to the amount of net proceeds (sale price minus loan repayment (other than HOME funds) and any closing costs).

A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

WPDD has no plans for using HOME funds for the acquisitions of units.

3. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

WPDD has no plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

4. Use of HOME affordable homeownership limits is as follows:

In the use of HOME funds for homebuyer assistance or for rehabilitation of owner-occupied single family housing, the City uses the HOME affordable homeownership limits for the area as provided by HUD.

5. Eligible HOME applicants for the buyer program are described as follows:

Eligible HOME applicants for the buyer program are first-time, income-eligible home buyers who have secured a commitment of a first mortgage and executed a purchase and sales agreement on a code-compliant, lead-safe property. Outreach is done through a varied of different mechanisms including flyers, websites, events, partners, and print media. Application packages are available in the Department of Planning & Development, City Hall, 169 Main Street, Woonsocket and on the City website www.ci.woonsocket.ri.us.

6. Limiting beneficiaries or giving preference will be done only with proper notice and according to the following:

Any limitation or preference will not violate nondiscrimination requirements in 24 CFR 92.350, and the City will not limit or give preferences to students.

A limitation or preference may include, in addition to targeting tenant- based rental assistance to persons with special needs, as provided in 24 CFR 92.209(c)(2), limiting beneficiaries or giving preferences to such professions as police officers, teachers, or artists.

The City will not limit beneficiaries or give a preference to all employees of the jurisdiction.

The City may permit rental housing owners to limit tenants or give a preference in accordance with 24 CFR 92.253(d) only if such limitation or preference is described in the action plan to action plan as amended.

7. Affirmatively market housing including housing containing five or more HOME-assisted units

In accordance with the HOME Investment Partnerships Program Regulations (Section 92.351) and in furtherance of the City of Woonsocket's commitment to non-discrimination and equal opportunity in housing, the City of Woonsocket established procedures to affirmatively market units developed, rehabilitated or made available under the HOME Program. These procedures are intended to further the objectives of Title VIII of the Civil Rights Act of 1968 and Executive Order 11063. The City's programs are target properties sized 1-4 units. Exceptions will be made for maximizing the availability of affordable rentals. For FY 2019-2020, property size may increase due to demand. Policies and procedures are established for those sized properties with an opportunity to apply for a size waiver should an owner of properties sized 5-6 units or larger offer an expansion in affordable housing for low to moderate income families.

It is the affirmative marketing goal of the City of Woonsocket to assure that individuals who normally might not apply for the available housing units because of their race or ethnicity:

- Know about the availability
- Are encouraged to apply
- Have the opportunity to rent or purchase the units

This policy will be carried out through the following implementation procedures:

Informing the Public

The City of Woonsocket will inform the public, potential tenants, and owners about its affirmative marketing policy and Title VIII and Executive Order 11063. It will:

- Summarize affirmative marketing policy when promoting HOME Program activities in the Woonsocket Call and other appropriate local media.
- Meet directly with property owners interested in participating in the Program and provide them with a copy of the policy and procedures.
- Include the use of the Equal Housing Opportunity logo or slogan on all printed material.

Informing about available Housing Units

The City of Woonsocket recommends that participating property owners contact the City as soon as they know a unit in their rehabilitated property is to become available. The City asks owners to provide this information if possible, at least 30 days before the availability of the vacant unit. When the City is informed of vacancies, the City says that if the owner finds it financially feasible, the public should be advised of the vacancy through one or more of the various methods:

- Advertising to the public in the Woonsocket Call and the Valley Breeze, are the primary newspapers of general circulation in Woonsocket. The owner will not advertise to the public until a minimum of one week has passed since the beginning of special outreach efforts to inform persons otherwise not likely to apply.

- Including all advertising and written promotional materials, the Equal Housing Opportunity logo and/or slogan. The newspapers general statement preceding all advertising is acceptable.
- If necessary, provide special outreach activities to specific targeted residents that may not otherwise be likely to apply for the housing units.
- If print advertising is not a financially feasible option for landlords, the City will review other efforts to attract persons least likely to apply, as well as other rental prospects.

Special Outreach

In cases where special outreach is needed to inform individuals that housing is available, the City will provide information and program materials to two specific organizations that serve the Hispanics and Southeast Asian communities: Progreso Latino and the Socio-economic Development Center for Southeast Asians. The City also contacts neighborhood groups, religious, social and community organizations that may be able to assist in providing special outreach efforts. The City provides assistance to help families, not owning a home, to save for a down-payment through the housing authority self-sufficiency program and by providing partial down-payment assistance.

Record keeping

The City of Woonsocket will request that records be kept of the following:

- Copies of ads placed in the Woonsocket Call, Valley Breeze, etc.
- Records of dates of contact with local agencies
- Copies of all outreach materials utilized by property owners.
- Copies of all results of marketing efforts by property owners on a periodic basis as determined by the City.

Assessment and Corrective Actions

Effectiveness of the City's affirmative marketing efforts and those of property owners will be assessed as follows:

To determine if good faith efforts have been made: Compare the information contained on the records to be kept with actions that were taken to carry out the required steps. If the required steps were taken, the City will determine that good faith efforts have been made.

To determine results: The City will examine whether or not persons from the variety of racial and ethnic groups in the community applied for or became tenants of units that were affirmatively marketed. (If the City finds that minorities are reached, particularly Hispanics and Southeast Asian communities, the City will assume that its procedures were effective.)

If one or more such groups are not represented, the City will review the procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective.

The City of Woonsocket will take corrective actions if it finds that owners fail to carry out procedures required of them. If, after discussing with the owners ways to improve procedures the owners continue to fail to meet the affirmative marketing requirements, the City of Woonsocket will consider disqualifying an owner from future participation in the HOME Investment Partnerships Program.

In practice it appears as though most low to moderate income owners of rental properties sized 1-3 units notify the public of vacancies by way of signage and word of mouth. Advertising in the local newspaper is cost prohibitive for many of the owners. However, that remains the City's recommended outreach method.

The City of Woonsocket will carry out its assessment activities. A written assessment of affirmative marketing efforts will be included in the CAPER. This assessment will cover marketing relative to units first made available for occupancy during that reporting period.

The City has no plans to use sub-recipients, CHDOs, or other entities to provide the homebuyer assistance.

91.220(l)(1) Program Specific Requirements - ESG

Emergency Solutions Grant (ESG)
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1. Include written standards for providing ESG assistance (may include as attachment)

- **Policies for evaluation of individuals and families' eligibility for assistance.**

All providers funded under ESG shall utilize a standardized assessment process when determining eligibility for all individuals and families presenting for ESG services and/or shelter. This process is currently being developed by a joint committee of service providers, consultants, and the CHF Partnership.

All providers funded under ESG will follow the eligibility and documentation standards developed by HUD and the Homeless Management Information System (HMIS) for all clients served with ESG shelter, HPRP, and/or services.

Family Shelter Providers shall utilize 211 (United Way) as a central intake point and hotline for families seeking shelter. 211 Operators shall also keep a waitlist of families in need of shelter and/or services. Family shelter providers shall ONLY select clients from 211's waitlist, however they have sovereignty over which family they select. It is the expectation that Family Shelter Providers will work to target the most vulnerable families for shelter/services.

The policies and procedures of providers funded under ESG shall be consistent with the definitions of homeless and at risk of homelessness in 24 CFR 576.2 and the recordkeeping requirements in 24 CFR 576.500(b), (c), (d), and (e).

- Standards for targeting and providing services related to street outreach.

All providers funded under the Street Outreach activity will provide services to all unsheltered persons that desire to be engaged and provided services. When able, outreach workers shall target services and resources to those with pronounced mental and/or physical health issues, so as to improve their access to resources that will improve the clients' safety and wellbeing.

In order to improve service delivery to those who are unsheltered, periodic outreach worker workshops will be hosted by the CHF Partnership. Topics are to include: case conferring, trainings, resource sharing, etc.

- Policies and procedures for admission, diversion, referral and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations.

In order to streamline the provision of services in the Rhode Island homeless system and comply with federal requirements, the Consolidated Homeless Fund Partnership will be implementing new assessment and system procedures. All providers funded under the Consolidated Homeless Fund will have the opportunity to provide feedback and input on the final process to be adopted, however an outline of the new system standards is provided in this document.

Insert here when available from State: CONSULTANTS PLAN

- **Policies and procedures for assessing, prioritizing and reassessing individuals' and families' need for essential services relate to emergency shelter;**

Providers funded under the Consolidated Homeless Fund will be required to use statewide standardized intake procedures and assessment forms. These procedures (once developed by a joint committee of providers and the CHF Partnership) will help determine a prospective client's needs, housing situation, and what resources will be best suited to stabilize their crisis and transition them quickly to permanent housing.

- Policies and procedures for coordination among providers.

In order to accomplish the goal of helping homeless and at-risk households realize housing stability, CHF providers will be required to work collaboratively with other service providers and coordinate with them whenever possible.

To encourage collaboration, the CHF Partnership will hold required periodic trainings and workgroups to bring providers together to share ideas/best practices and troubleshoot common problems and situations.

- Policies and procedures for determining and prioritizing which eligible families and individual will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

Homelessness Prevention Services – Assistance provided to individuals and families to help prevent clients from becoming literally homeless (living in shelter, street, etc). The ESG provider funded under this activity must offer services statewide to any eligible clients. Assistance should be targeted to those households that are most likely to present at a shelter or become literally homeless, and not necessarily those persons with the least housing barriers and/or those who are highly self-sufficient prior to the provision of HPRP services.

Rapid Re-Housing Services – Assistance provided to *quickly* move individuals and families out of emergency shelters and places not meant for human habitation into permanent housing. The provider funded under this activity must offer services statewide to any eligible clients and will be responsible for outreaching to the various shelters and street outreach programs around the state to access eligible clients. Assistance should be targeted to those households that will be most likely to sustain housing once assistance ends.

- **Standards for determining what percentage or amount of rent and utilities costs each program participate must pay while receiving HPRP assistance.**

HPRP Providers are encouraged to utilize various kinds of financial assistance subsidy types (sliding scale, percentage of income, etc) to help encourage the household to be independent and thoughtful spending and savings. However, individual assistance will be determined on a case-by-case basis and shall be subject to periodic re-certifications of eligibility.

- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.

The CHF Partnership will limit financial assistance in accordance with the Interim ESG regulations (no more than 24 months in a 3 year period), including:

- Rental Assistance (Ongoing up to 24 months, Includes up to 6 months of arrears)
- Rental Deposits
- Utility Assistance (Ongoing up to 24 months, Includes up to 6 months of arrears)
- Utility Deposits
- Moving Cost Assistance

Homelessness Prevention Services – To best assist this population, intensive case management, financial literacy, and budgeting shall be provided to clients on a regular basis, to ensure housing stability once assistance ends. It is anticipated that most clients served under this activity will receive an average of 3-6 months of financial assistance and up to 9 months of case management and financial counseling. However, individual assistance will be determined on a case-by-case basis and shall be subject to 3-month re-certifications of eligibility.

Rapid Re-Housing Services – To best assist this population, intensive case management, financial literacy, and budgeting shall be provided to clients on a regular basis, to ensure housing stability once the client exits the program. It is anticipated that most clients served under this activity will receive an average of 6-9 months of financial assistance and up to 12 months of case management and financial counseling. However, individual assistance will be determined on a case-by-case basis and shall be subject to yearly re-certifications of eligibility.

- Standards for determining the type, amount and duration of housing stabilization and/or relocation services to provide a program participant, including limits on the HPRP assistance each participant may receive.

The CHF Partnership will limit the Housing Relocation and Stabilization Services in accordance with the Interim ESG regulations, including:

- Housing Stability Case Management (no more 24 months in a 3 year period)
- Housing Search and Placement Assistance (no more 24 months in a 3 year period)
- Landlord Mediation or outreach to property owners (no more 24 months in a 3 year period)
- Legal services related with eviction defense and prevention (no more 24 months in a 3 year period)
- Credit repair or financial counseling services (no more 24 months in a 3 year period)

Homelessness Prevention Services – To best assist this population, intensive case management, financial literacy, and budgeting shall be provided to clients on a regular basis, to ensure housing stability once assistance ends. It is anticipated that most clients served under this activity will receive up to 9 months of case management and financial counseling. However, individual assistance will be determined on a case-by-case basis and shall be subject to 3-month re-certifications of eligibility.

Rapid Re-Housing Services – To best assist this population, intensive case management, financial literacy, and budgeting shall be provided to clients on a regular basis, to ensure housing stability once the client exits the program. It is anticipated that most clients served under this activity

will receive up to 12 months of case management and financial counseling. However, individual assistance will be determined on a case-by-case basis and shall be subject to 3-month re-certifications of eligibility.

1. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The CHF Partnership coordinates its program and distribution methods with State homeless funds and federal Title XX funds. Additionally, the CHF Partnerships meets regularly with the RI Continuum of Care (COC) and includes a COC representative on the CHF Partnership review committee.

The Rhode Island Interagency Council on Homelessness is closely aligned with the CHF Partnership and is working to help the Partnership coordinate with and access other federal and state resources for homelessness and social services.

2. Identify the process for making awards and sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The CHF Partnership developed its estimated funding priorities and process for making awards through consultation with various sources, including COC/community stakeholders, service providers, consumer feedback, and HMIS data. In following Opening Doors objectives, the CHF Partnership emphasized many of the objectives listed in the plan, including but not limited to:

- Increased emphasis on performance and client outcomes,
- Prioritizing funding for HPRP type activities, &
- Increased collaboration between providers and other mainstream resources.

During the input sessions, many of the stakeholders and service providers indicated a strong need for more service dollars (case management, training, street outreach, etc) to help stabilize households and reduce shelter lengths of stay. Therefore the CHF Partnership devoted more ESG funds towards service and street outreach dollars, than had been allocated in the past. Through consultation with client level data in HMIS and annual Point in Time counts, the importance of continued support of emergency shelters was realized. Last year over 4,200 persons utilized an emergency shelter. While emergency shelters are not the ideal destination for any family or individual, they provide a needed emergency response, when no other resources are available (HPRP, family/friends, transitional housing, etc). During the input sessions providers reinforced the demand for operation expenses associated with emergency shelters.

Homelessness Prevention and Rapid Re-Housing (HPRP) services and financial assistance are a major component of the ESG funding plan. Funds will be made available to the CHF Partnership by the U.S. Department of Housing and Urban Development for the Emergency Shelter Grants Program of which up to 7.5% may be set aside for program administration. This program will be administered by the State of Rhode Island and the remaining parties in the CHF Partnership (Applications were submitted to the CHF Partnership C/O Department of Administration, Division of Planning, Office of Housing and Community Development, One Capitol Hill - 3rd

Floor, Providence, R.I. 02908-5873). At the discretion of the CHF Partnership, administration funds may, in whole or in part, be made available to fund emergency situations serving the homeless, including emergency winter shelter needs.

Private non-profit organizations, including community and faith-based organizations, are eligible to apply for funding. There is no restriction on the maximum amount an applicant may request.

Review Process

The CHF Partnership has appointed a Review Committee to evaluate the submitted applications. This committee will consist of representation from:

- City of Providence,
- City of Pawtucket,
- City of Woonsocket
- RI Office of Housing and Community Development,
- RI Department of Human Services,
- RI Department of Behavioral Healthcare, Developmental Disabilities and Hospitals,
- RI Governor's Office Policy staff,
- RI Housing (Lead COC Applicant),
- RI Housing Resource Commission,
- United Way/philanthropic organization

Applications will be rated by OHCD on the following criteria:

1. Number of clients served.
2. Population served.
3. Services provided and/or Mainstream Resources accessed.
4. Location of shelter (taking into account other public resources allocated/available to the program)
5. Consideration will be given to program effectiveness in meeting adopted performance measures, as outlined in the application packet.
6. Extra consideration will be given to those agencies which have been effective in their discharge of clients/consumers.

Following rating and review by CHF Partnership staff for compliance with state and federal program requirements, the Review Committee will evaluate all proposals. The Committee will recommend funding to the Governor and Mayors of Pawtucket, Providence, and Woonsocket, who will then make the grantee awards.

3. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions

regarding facilities and services funded under ESG.

N/A

4. Describe performance standards for evaluating ESG activities.

The CHF Partnership started including performance standards in the funding contracts with sub-recipients since the 2011 ESG program year. To develop these standards the CHF Partnership held workshops and met with each ESG funded grantee and worked with them to create individual performance standard plans that typically included:

- Increasing permanent housing
- Reducing length of stay
- Increasing average household income at exit

These performance standards are reviewed periodically by the CHF Partnership and sub-recipients. Performance with regards to their standards is also an important component of the following years review committee, when allocating funds.

Operation and Administration of the Homeless Information Management System (HMIS):

One continuum covers all of Rhode Island, with one agency, the Rhode Island Coalition for the Homeless (RICH) acting as the lead HMIS agency. RICH oversees the HMIS system, trains users, provides troubleshooting, and serves as the central portal for collection and dissemination of data. RICH is overseen by its funders who include: RI Housing (Lead COC applicant) and the CHF Partnership.

A stakeholder input meeting regarding the funding, policies, and procedures for the operation and administration of the Homeless Information Management System (HMIS) was held on April 26th, 2019. Attendees included the CHF Partnership, the lead HMIS agency, the lead applicant for the COC, and a HMIS data analyst (from a local university). Topics covered during this meeting included:

- Budget and costs of managing the system
- Potential funding opportunities
- Staffing needs (as system grows and more emphasis is placed on data)
- Ideas for policies governing decision making, licenses, etc
- Updates to current Rhode Island's Data Quality Standards (2010)

The CHF Partnership considered all comments received during the input session when developing the final draft of the 2019 CHF Request for Funding and the ESG Substantial Amendment. In the future, additional HMIS input sessions will be held as policies are added and refined.

91.230 Recipient Review/Monitoring

The CHF Partnership utilizes a risk-based approach to monitoring its sub-recipients under the Emergency Solutions Grants Program. Programs are tracked in-house through the HMIS system

and/or completion of progress reports and review of information funded agencies have provided. Regular interaction is maintained with those recipients who receive sizable awards.

Periodic on-site monitoring of recipients is completed by CHF Partnership staff and may be coordinated with the efforts of the State's McKinney Continuum of Care performance reviews.

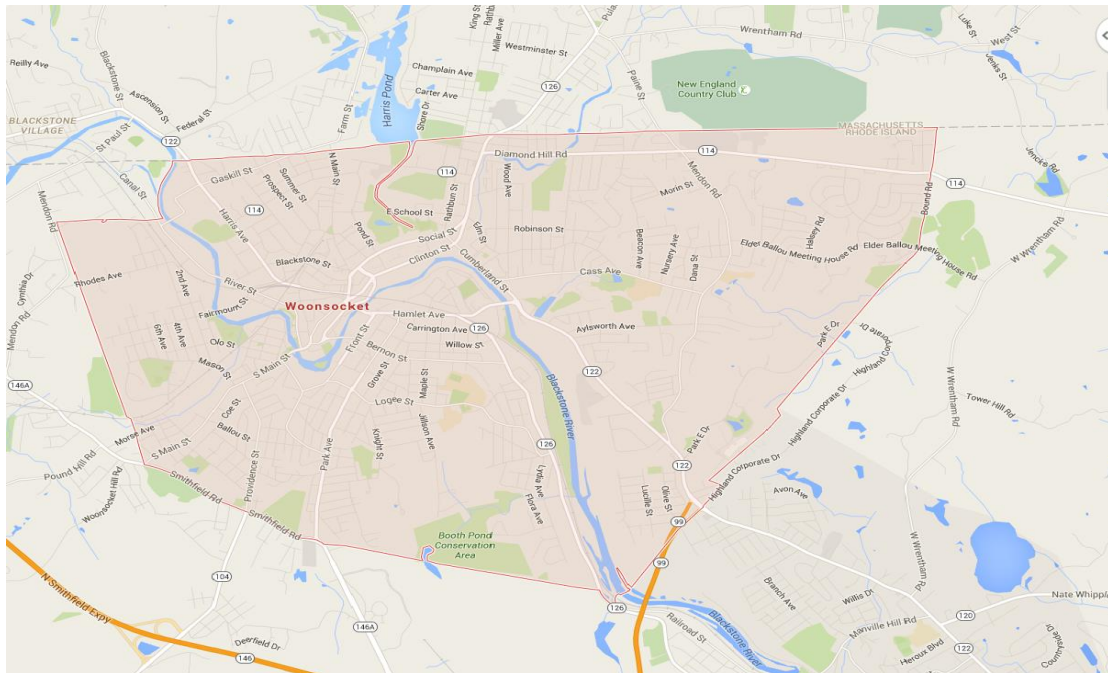
Coordination with Other Resources, Consolidated Homeless Fund

The CHF Partnership coordinates its program and distribution methods with State homeless funds and federal Title XX funds. Additionally, the CHF Partnerships meets regularly and consults with the RI Continuum of Care (COC) and includes a COC representative on the CHF Partnership review committee.

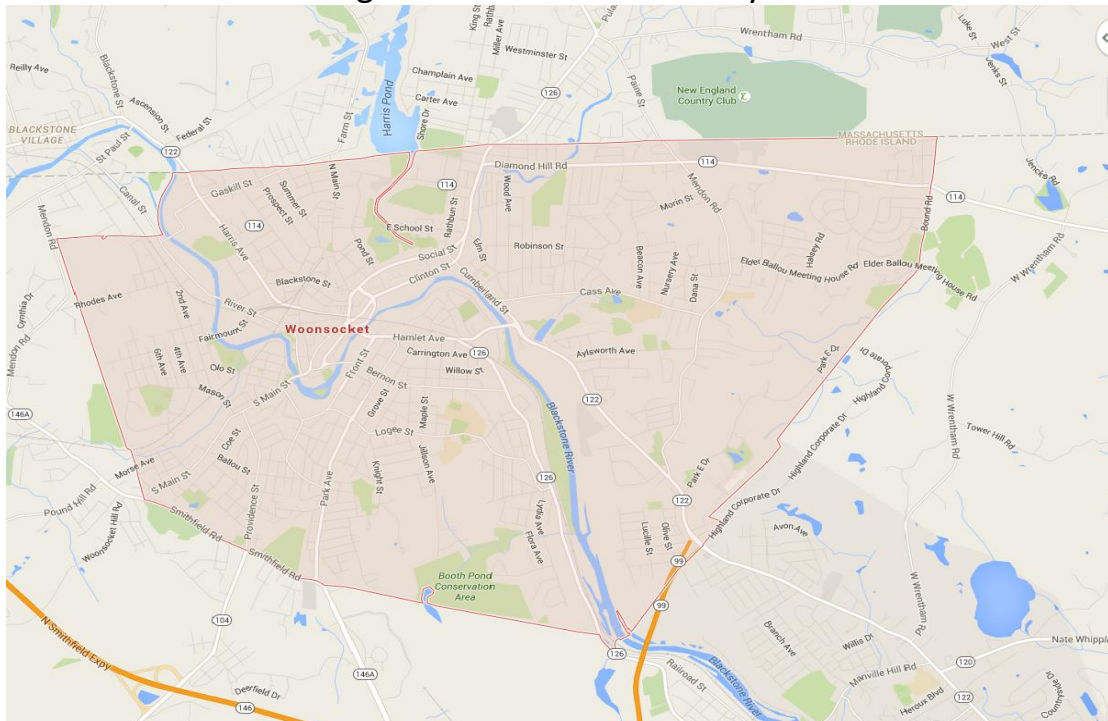
The Rhode Island Interagency Council on Homelessness is closely aligned with the CHF Partnership and is working to help the Partnership coordinate with and access other federal and state resources for homelessness and social services.

Maps

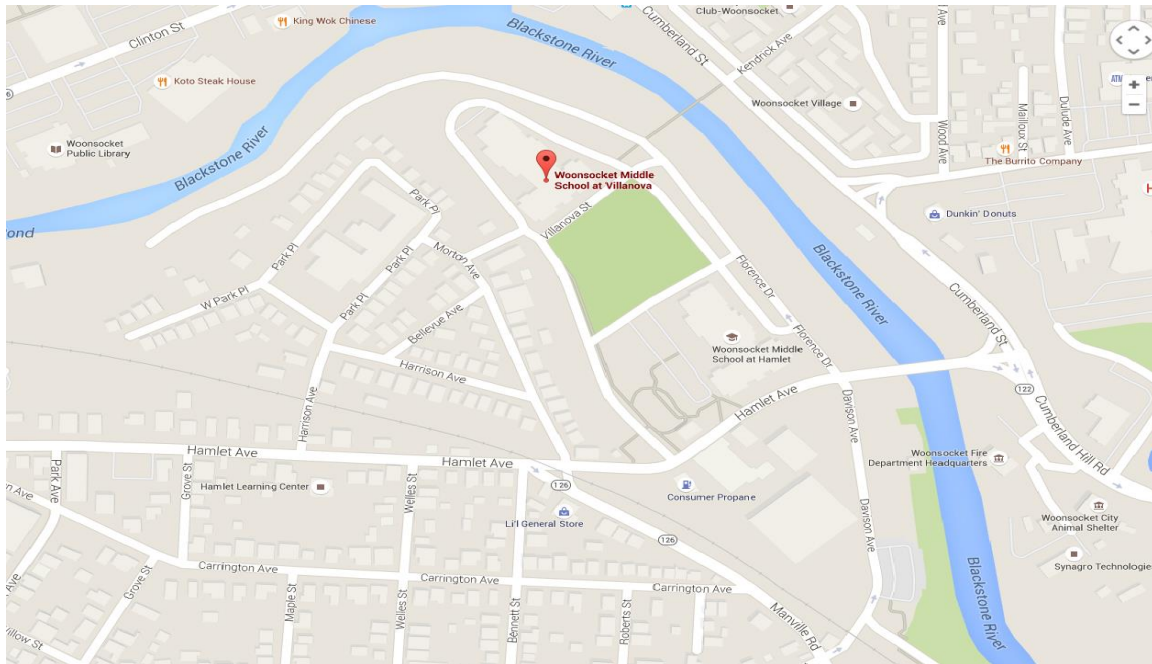
City of Woonsocket, RI



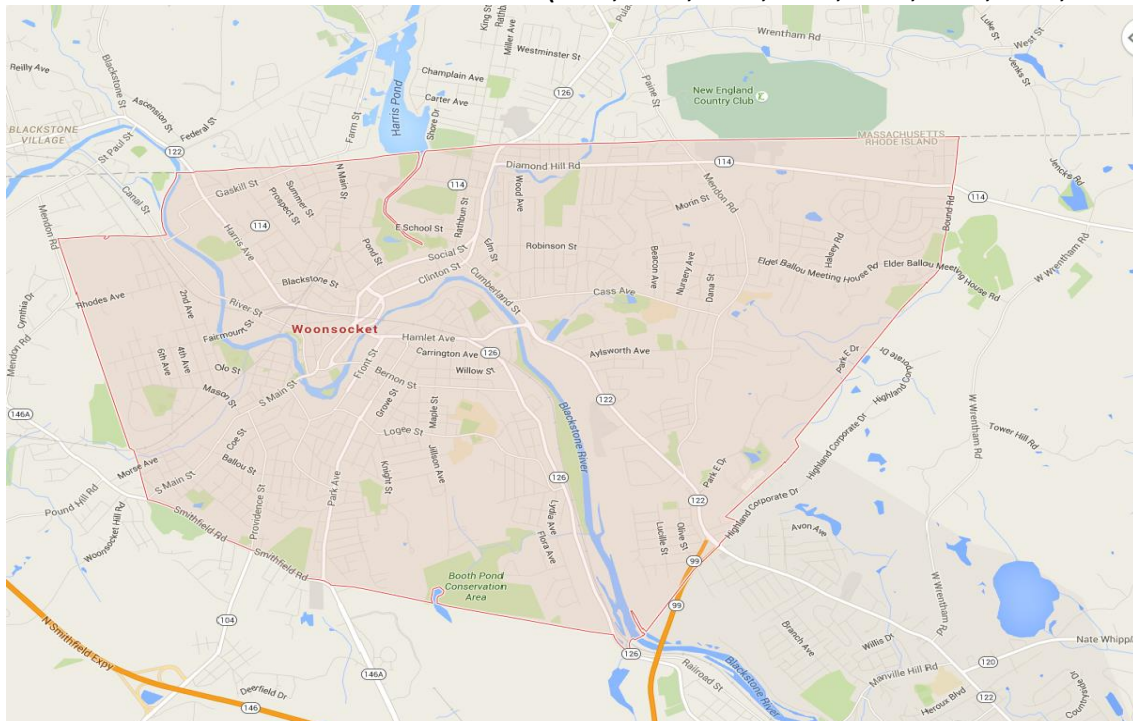
Program Administration – City Wide



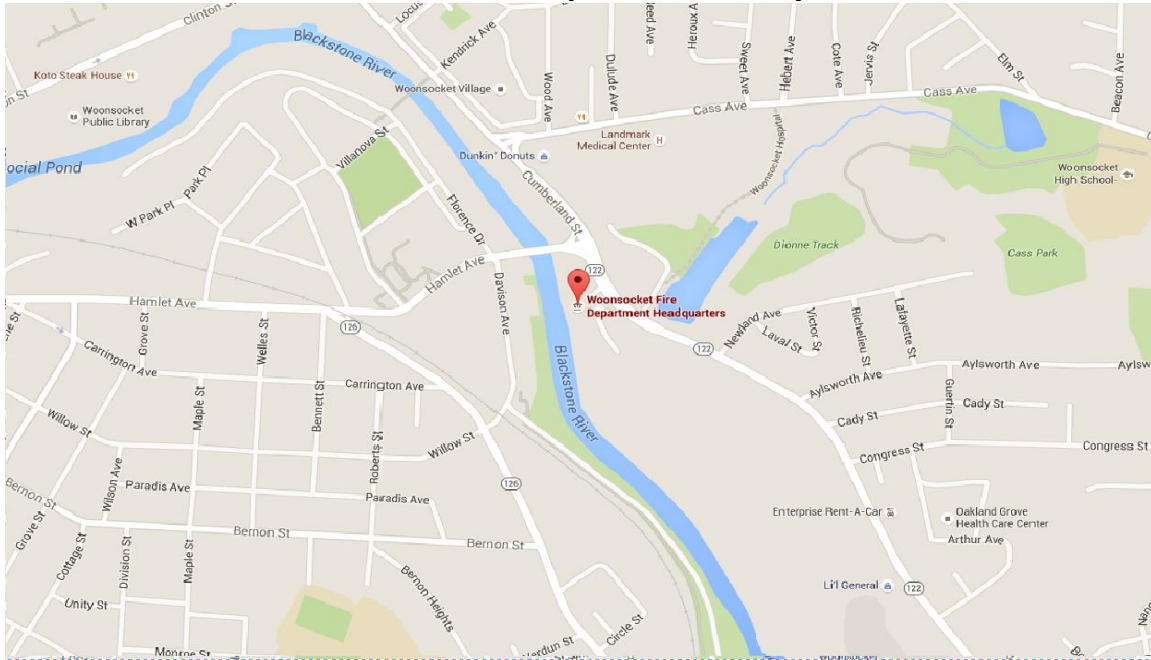
Section 108 Loan – Woonsocket Middle Schools



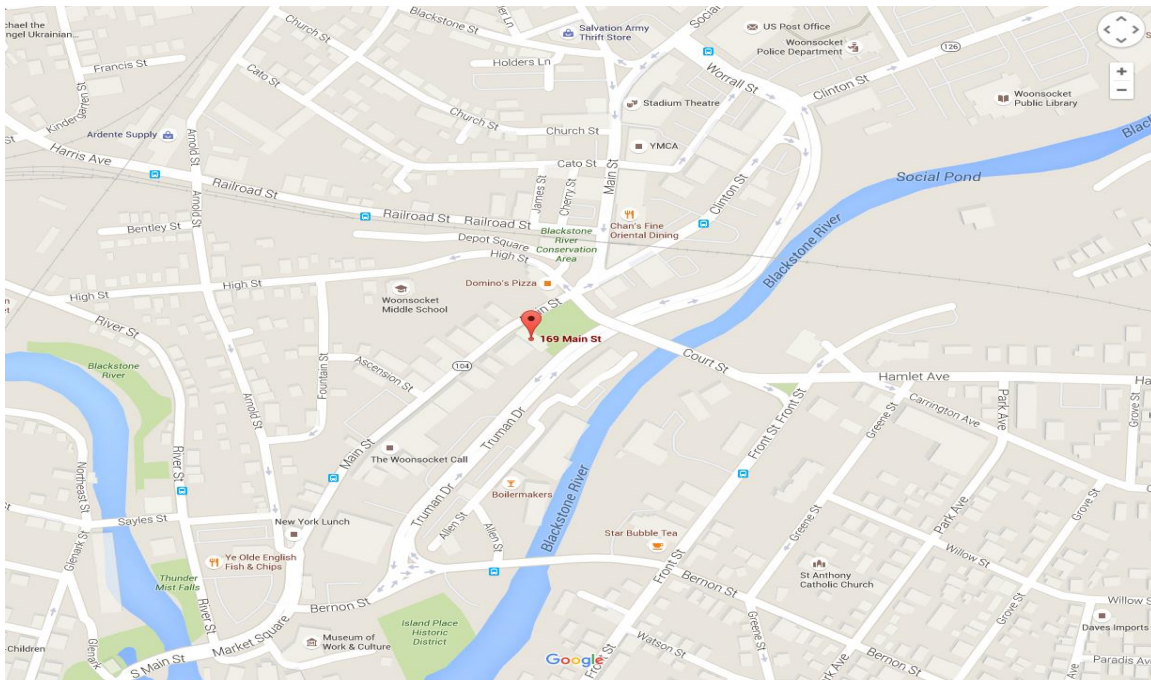
Code Enforcement – Census Tracts (174, 176, 178, 179, 180, 181, 182, 183)



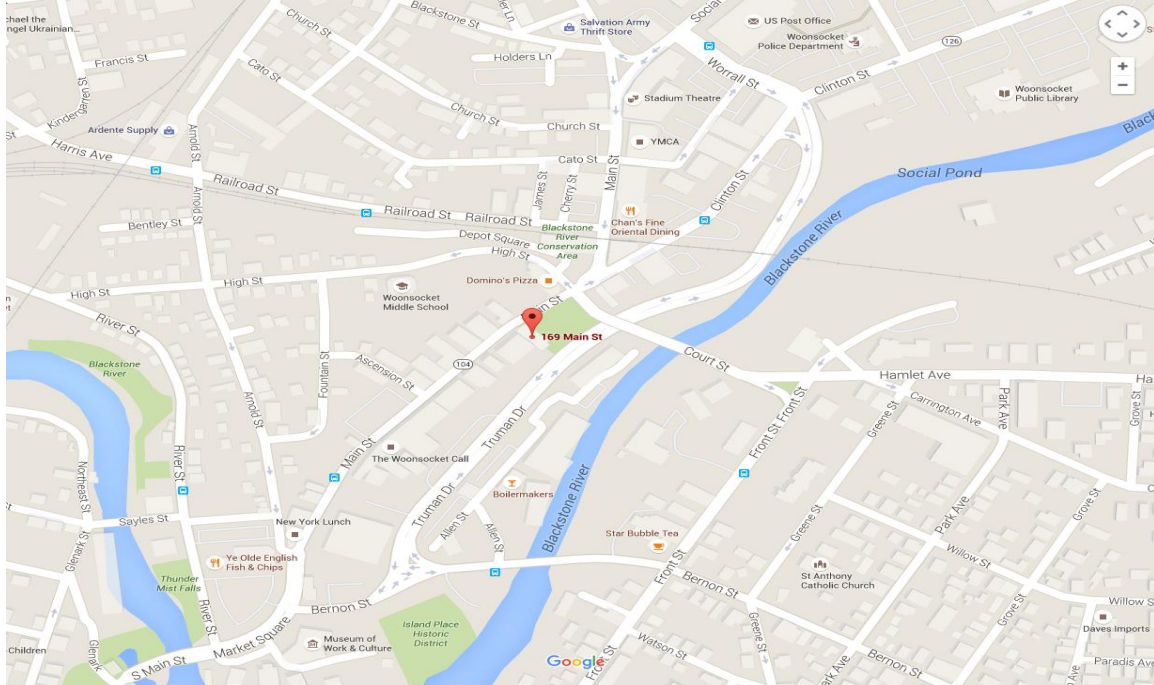
Woonsocket Fire Department – City Wide



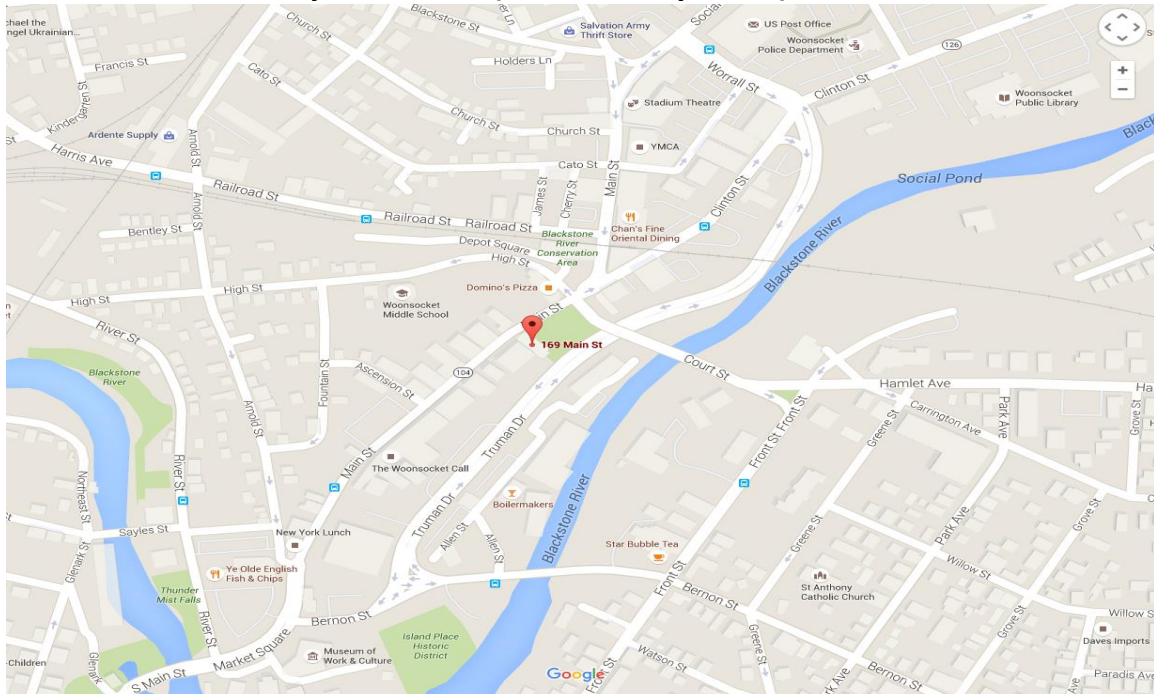
Small Business Loan Program – City Wide



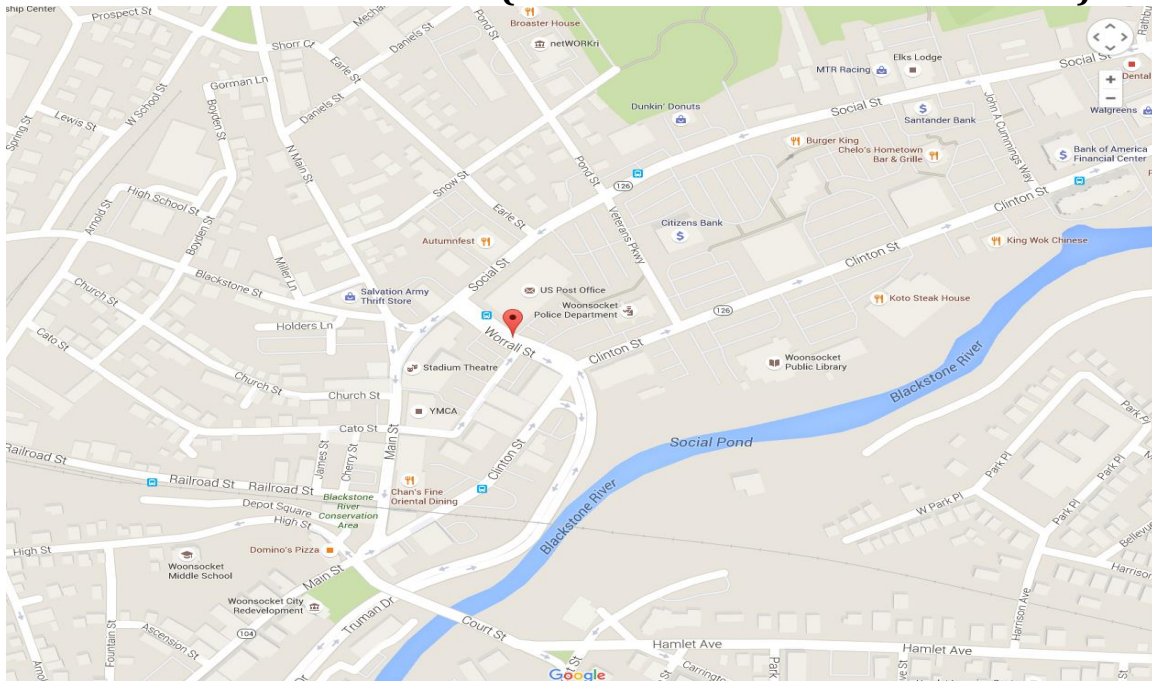
Commercial Façade Rehabilitation Program – CT's 180, 176, 174



Micro-Enterprise Grant (Eco-Development) – 180, 176, 174



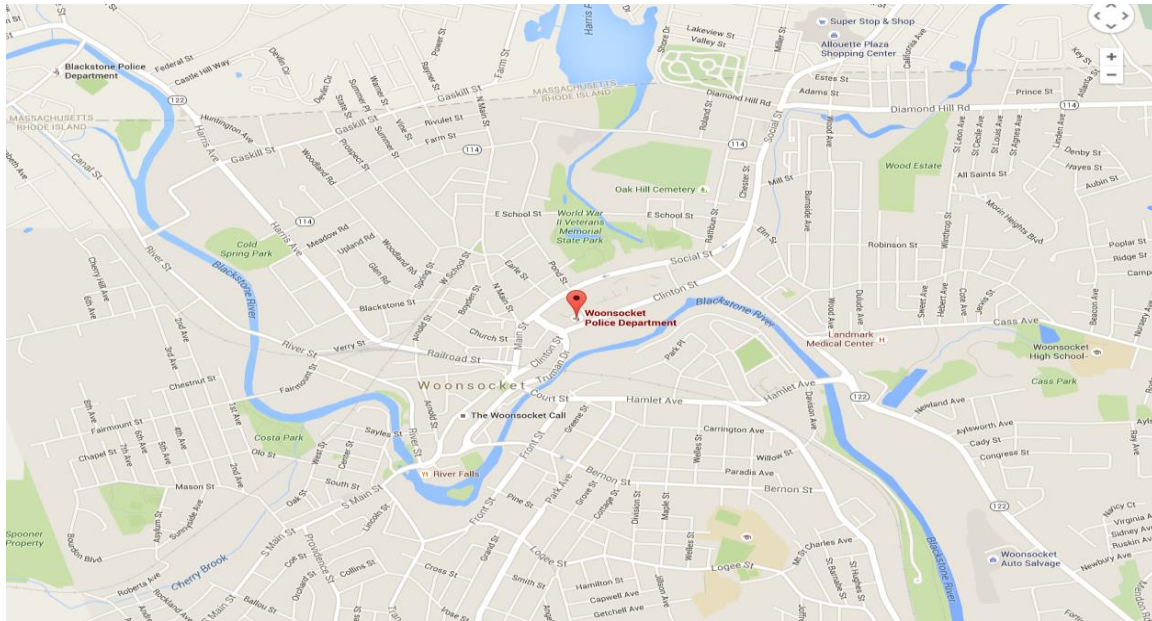
Road Reconstruction (Allowable Areas - Census Tracks) Sidewalk Reconstruction (Allowable Areas - Census Tracks)



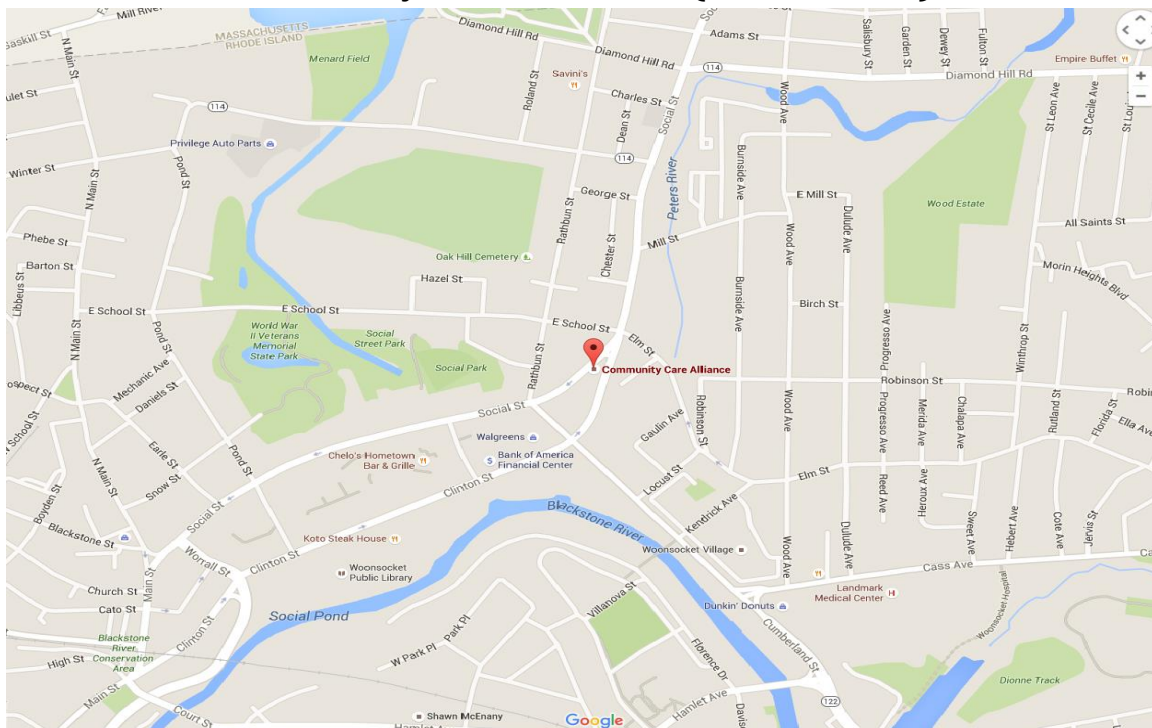
Senior Services Inc. (Adult Alt & Elderly Nutrition)



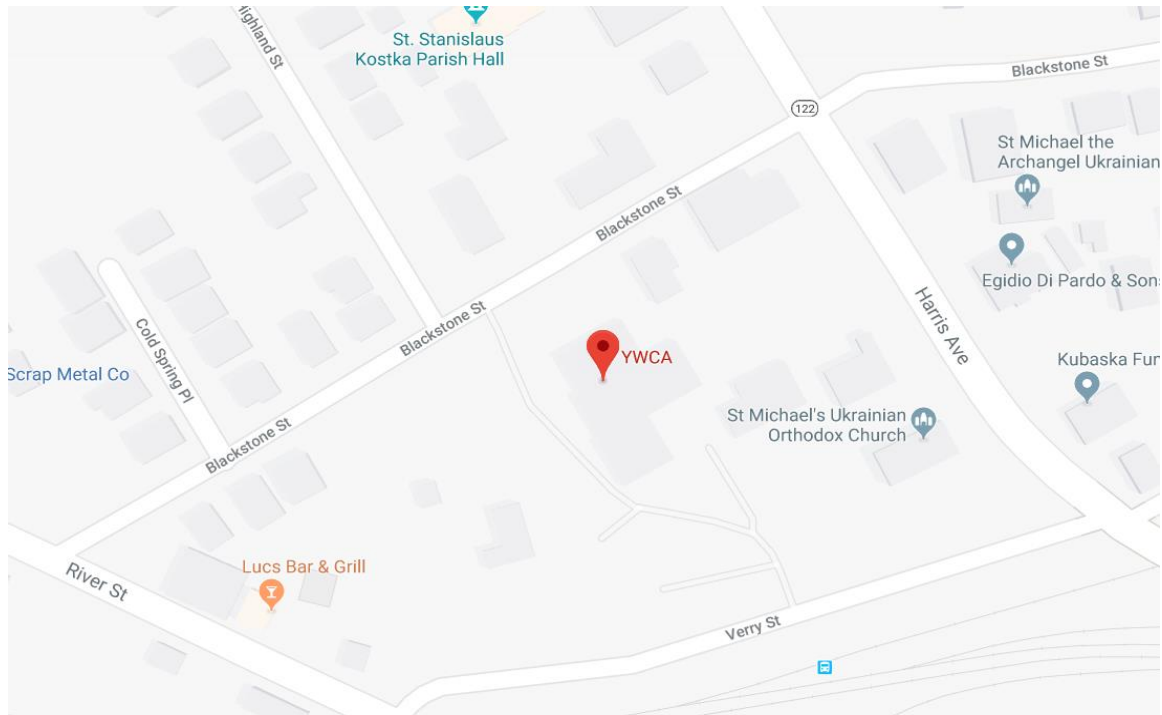
Woonsocket Police Department – “Feet on the Beat”



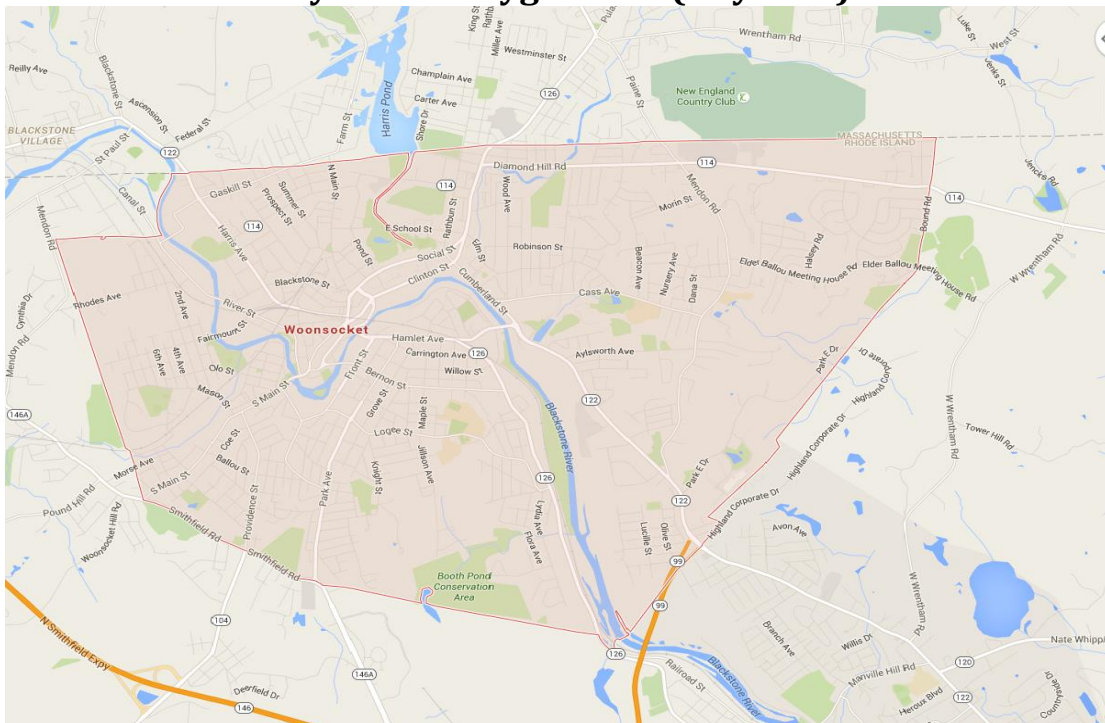
Community Care Alliance – (CDBG & ESG)



YWCA of RI



Demolition/Clearance (Citywide) City Parks Playgrounds (Citywide)



Citizens' Participation Agreement

City of Woonsocket, Citizen Participation Plan amended 9/30/99

(a)(1) *Applicability and adoption of the citizen participation plan*

In June of 1995, The City of Woonsocket adopted a Citizen Participation Plan that sets forth the City's policies and procedures for citizen participation in accordance with 24 CFR 91.105. There is an amendment to that plan. The changes are not substantive, but serve to clarify the procedures and demonstrate compliance with 24 CFR 91.105.

(a)(2) *Encouragement of citizen participation*

This plan provides for and encourages citizens to participate in the development of the consolidated plan, any substantial amendments to the consolidated plan, and the performance report. It especially encourages participation by low- and moderate-income persons living in areas where CDBG funds are proposed to be used and by residents of predominately low and moderate-income neighborhoods, as defined by the jurisdiction.* The plan also encourages participation of all citizens including minorities and non-English speaking persons, as well as persons with disabilities. Information is provided to the public housing authorities about consolidated plan activities related to its developments and surrounding communities.

(a)(3) *Citizen comment on the citizen participation plan and amendments*

Citizens will be provided with a reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the plan, and makes the citizen participation plan available for public review and comment. It will be made available in a format accessible to persons with disabilities, upon request.

(b)(1) *Development of the consolidated plan*

Before the jurisdiction adopts a consolidated plan, information that includes the amount of assistance the jurisdiction expects to receive and the range of activities that may be undertaken will be made available to citizens, public agencies, and other interested parties. The information will be made available at City Hall and the public library.

In the administration of CDBG programs, the displacement of persons and will assist any persons displaced will be minimized as much as possible. Assistance will consist of relocation and resource identification and linkage.

(b)(2) The proposed consolidated plan will be published in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments.

- Notification of the availability of the proposed consolidated plan will be made using some of the following approaches:
- Newspaper advertisements
- Published summary of the proposed consolidated plan in a newspaper of general circulation

- Meeting notices posted in public buildings
- Mailings to community organizations, social service agencies, public and private interest
- Notice to advisory boards

A reasonable number of free copies of the plan are made available to citizens and groups that request it.

(b)(3) At least one public hearing will be held during the development of the consolidated plan, and two public hearings per year, to obtain citizens' views and to respond to proposals and questions. The hearings will be conducted at a minimum of two different stages of the program year. The hearings will address housing and community development needs, development of proposed activities, and review of program performance. See (e) below.

(b)(4) Citizens will be given a period, not less than 30 days, to present comments on the consolidated plan.

(b)(5) All views or comments of citizens received in writing, or orally at the public hearings, will be considered by the jurisdiction in the preparation of the final consolidated plan. A summary of the views or comments, and a summary of any views and comments not accepted and the reasons therefore, shall be attached to the final consolidated plan.

(c)(1) Amendments

The criteria the jurisdiction will use in determining a substantial amendment is specified below:

- A transfer of funds from an existing line item to a new activity or to a new sub-recipient which has not been funded in the current grant year or within the effective period of the current consolidated plan;
- The amount of the proposed transfer exceeds ten percent (10%) of the total, current CDBG grant allocation;
- The result of the proposed transfer eliminates all prior approved funding for the activity or sub-recipient within that grant year.

(c)(2) Citizens will be given a period, not less than 30 days, to present comments on the substantial amendment before the amendment is implemented.

Proposed substantial amendments will be published in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments.

Notification of the availability of the proposed consolidated plan will be made using some of the following approaches:

- Newspaper advertisements
- Published summary of the proposed consolidated plan in a newspaper of general circulation
- Meeting notices posted in public buildings
- Mailings to community organizations, social service agencies, public and private interest
- Notice to advisory boards

(c)(3) All views or comments of citizens received in writing, or orally at the public hearings, if any, will be considered by the jurisdiction in the preparation of a substantial amendment. A summary of the views or comments, and a summary of any views and comments not accepted

and the reasons therefore, shall be attached to the substantial amendment of the consolidated plan.

(d)(1) Performance Reports

Citizens will be provided with reasonable notice and an opportunity to comment on performance reports. A period, not less than 15 days, will be provided to receive comments on the performance report that is to be submitted to HUD.

The proposed substantial amendment will be published in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments.

Notification of the availability of the performance report will be made using some of the following approaches:

- Newspaper advertisements
- Published summary of the proposed consolidated plan in a newspaper of general circulation
- Meeting notices posted in public buildings
- Mailings to community organizations, social service agencies, public and private interest
- Notice to advisory boards

(d)(2) All views or comments of citizens received in writing, or orally at the public hearings, if any, will be considered by the jurisdiction in the submittal of a performance report. A summary of the views or comments, and a summary of any views and comments not accepted and the reasons therefore, shall be attached to the performance report.

(e)(1) Public Hearings

At least one public hearing will be held during the development of the consolidated plan, and two public hearings per year, to obtain citizens' views and to respond to proposals and questions. The hearings will be conducted at a minimum of two different stages of the program year. The hearings will address housing and community development needs, development of proposed activities, and review of program performance.

(e)(2) Notice of hearings will be distributed/posted maximum two weeks in advance of meetings, forty-eight (48) hours minimum.

(e)(3) Public hearings will be held at conveniently located facilities and at times suitable for maximum public input by potential and actual beneficiaries, and with accommodation for person with disabilities.

(e)(4) A translator will be provided in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate

(f) Meetings

Citizens will be provided with reasonable and timely access to local meetings as detailed above.

(g) Availability to the public

The consolidated/annual plan as adopted, substantial amendments, and the performance report will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. Documents will be available for review at City Hall. The Department of Planning and Development will be the designated contact.

(h) Access to records

Citizens, public agencies, and other interested parties will be provided with reasonable and timely access to information and records relating to the jurisdiction's consolidated plan and the jurisdiction's use of assistance under the programs during the preceding five years.

(i) Technical Assistance

Technical assistance will be given to groups representative of persons of low- to moderate-income that request such assistance in developing proposals for funding covered by the consolidated plan.

(j) Complaints

Written complaints from citizens related to the consolidated plan, amendments, and performance report will receive a timely, substantive written response within 15 days, where practicable.

*Low to moderate income neighborhoods are defined as areas predominately occupied by **"persons of low and moderate income"** and **"low- and moderate-income persons"** mean families and individuals whose incomes do not exceed 80 percent of the median income of the area involved, as determined by the Secretary of the US Department of Housing and Urban Development with adjustments for smaller and larger families

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
- (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended;
 - or**
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants, and contracts under grants, loans, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

Date

Title - Mayor

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including Section 108 guaranteed loans during program year(s), 2015, 2016, 2017 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.

Signature/Authorized Official

Date

Title – Mayor

OPTIONAL CERTIFICATION

CDBG

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

NOT APPLICABLE – NO URGENT NEED

Signature/Authorized Official

Date

Title – Mayor

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature/Authorized Official

Date

Title – Mayor

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature/Authorized Official

Date

Title – Mayor

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.

2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).

5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).

6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code). Check if there are workplaces on file that are not identified here. This information with regard to the drug-free workplace is required by 24 CFR part 21.

7. Definitions of terms in the Non-procurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance"

means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of sub-recipients or subcontractors in covered workplaces).

Standard Form 424 CDBG, HOME, ESG

91.220(a) Standard 424

Scanned copies included in Plan

One original sent to CPD/HUD

One original sent to HUD/FHEO

