

City of Providence
HOME-ARP Allocation Plan

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EXECUTIVE SUMMARY

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

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

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

CONSULTATION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

List of Organizations Consulted:

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

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

Providence Housing Authority	Public Housing Agency Public Housing Agency that addresses the needs of the Qualifying Populations (QP2- at risk of homeless, QP3 - fleeing DV, and QP4- those requiring assistance to avoid homelessness/those at greatest risk of homelessness)	Virtual Meeting	<ul style="list-style-type: none"> • Need for increasing landlord participation in voucher programs • Case management services should be available to Section 8 voucher holders in private housing • Services should be fully funded • Fund developments with Tenant Selection Plans that reach target demographics most effectively • Support needed for staff who provide key services in this high turnover environment
Rhode Island Legal Services	Private Organization that addresses Civil Rights and Fair Housing Private Organization that addresses the needs of persons with disabilities	Virtual Meeting	<ul style="list-style-type: none"> • Difficult to place housing vouchers • Prioritize housing with services over just more housing units • Need to create more “no reject” housing and shelter options • Housing navigation needed across all populations • Rental assistance has been impactful, needs to be replaced • Shelter is necessary but should be limited, dignified and meet special needs
Rhode Island Center for Justice	Private Organization that addresses Civil Rights and Fair Housing Private Organization that addresses the needs of persons with disabilities	Virtual Meeting	<ul style="list-style-type: none"> • Prioritize housing with services over just more housing units • Housing navigation needed across all populations • Rental assistance has been impactful, needs to be replaced

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

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

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

Rhode Island Developmental Disabilities Council	Public organization that addresses the needs of person with disabilities	Virtual Meeting	<ul style="list-style-type: none"> • Very difficult to meet the diverse needs of disabled clients around Rhode Island • Increase wrap-around services • Transit options limit service options
City of Providence – Health Communities Office	Public organization that addresses the needs of qualifying populations (all QPs)	In-person Meeting	<ul style="list-style-type: none"> • Lack of accessible rehabilitation and recovery beds for Medicaid clients • Need more housing units and more housing units with services • Need for coordination between services

PUBLIC PARTICIPATION

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

Date of Public Notice: March 14, 2023

Public Comment Period Start Date: March 14, 2023 – March 29, 2023

Date of Public Hearing: March 28, 2023

The City provided opportunity for public input as a central part of the process of drafting the HOME-ARP Allocation Plan (“Plan”). Consistent with the City’s Citizen Participation Plan, the process of participation for drafting this Plan was designed to be robust and inclusive – and took place from Spring 2021 through Winter 2023. Members of the general public, individuals with direct lived experience, staff and leadership at partner nonprofits, affordable housing developers and homeless service providers, and community and client advocates were all invited to participate. The resulting Plan was made available for public review and comment starting March 14, 2023 for 15-days at <https://www.providenceri.gov/planning/community-development/> and remains available in hard copy upon request.

On March 28, 2023, a public hearing was convened in-person and virtually to solicit further input and receive additional feedback from the public – as well as from key partners who provide direct services to the members of the qualifying populations the HOME-ARP program seeks to assist. At this hearing, a presentation was available on HOME-ARP that included potential eligible uses of funds, the characteristics of the qualifying populations, the amount of HOME-ARP funding HCD

is expected to receive, the proposed range of activities to be funded, and the process of fulfilling HUD requirements for securing HOME-ARP funding including the development of this Allocation Plan and timeline of the program. During the public hearing, staff were available to field clarifying questions about the potential activities and client eligibility, receive any further feedback and public comment on how to prioritize HOME-ARP funds and any further input as to the needs and gaps in the current system of services and shelters.

It is important to note that public engagement related to the City's response to the COVID-19 public health emergency or its negative economic impacts has not been limited exclusively to HOME-ARP. In preparation for the receipt of unprecedented resources through the American Rescue Plan Act (Treasury SLFRF Funding, HOME-ARP, and other funds), the City underwent an extensive community engagement and hearing process to inform recovery spending starting in Spring 2021. That process included co-hosted meetings with community organizations, an empaneled Providence Rescue Plan Task Force with community representation, and solicitation of more than 1,100 survey responses (representative of the racial/ethnic breakdown of Providence). A summary of the City's recovery planning process and associated recommendations related to housing and homelessness can be found: <https://pvdrescueplan.com/>.

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

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

Describe any efforts to broaden public participation:

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

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

No additional comments were submitted during the public comment period, either in writing or at the public hearing on March 28, 2023.

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

N/A – no additional comments were submitted during the public comment period, either in writing or at the public hearing on March 28, 2023.

NEEDS ASSESSMENT AND GAP ANALYSIS

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

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

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

Homeless Needs Inventory & Gap Analysis Table (Statewide)

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	426	144	738	706	0								
Transitional Housing	170	73	104	97	94								
Permanent Supportive Housing	540	152	803	765	277								
Other Permanent Housing						135	705	30	187				
Sheltered Homeless						156	520	85	182				
Unsheltered Homeless						41	291	6	115				
Current Gap										591	197	840	811

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

Housing Needs Inventory & Gap Analysis Table (Statewide)

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

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

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

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	51,740		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	10,178		
Rental Units Affordable to HH at 50% AMI (Other Populations)	9,649		
0-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		10,165	
30-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		4,450	
Current Gaps			5,789

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

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

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

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

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

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

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

Unsheltered homelessness was up to an even greater degree, with 181 unsheltered homeless persons counted in 2021 – an increase of 66% over the 108 unsheltered persons counted in 2020. There was also a 57% increase in chronic homelessness – from 226 in 2020 to 357 in 2021. Veteran homelessness also increased, with 97 veterans counted in 2021 – up from 90 in 2020. Advocates frequently note that the Point-In-Time count underrepresents the true picture of homelessness in Rhode Island (i.e. fails to count those who are doubled up or in hotels/motels)– highlighting a larger universe of need than is reflected in the available data. The updated 2022 Point-in-Time Count reflects an even starker reality. Unsheltered homeless persons increased from 181 in 2021 up to 248, homeless veterans increased from 97 in 2021 to 113, and an even sharper increase was seen in those experiencing chronic homeless, from 357 in 2021 to 497 (a jump of another 40%).

The composition of Rhode Island's homeless population highlights the continuing need for equal access to housing. While Black individuals and families make up around 10% of Rhode Island's

population, nearly a third of homeless persons identify as Black. While only 3% of the state identifies as mixed-race, 16% of the families experiencing homelessness were mixed-race. In Rhode Island's general population, roughly 16% of households identify as Hispanic or Latino - over a third of families experiencing homelessness identify as Hispanic or Latino (36%). The data also demonstrates the challenges facing young people - nearly 23% of homeless persons counted were under 18 years old.

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

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

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

Households living at or below 30% of AMI were also a large majority of those who applied for rental assistance through the Rent Relief RI program – 71% of all awarded households live at or below 30% of AMI. Female headed households were also a large majority of those awarded – 68%. With nearly a third (28%) of all awards going to households that identified as mixed race, 40% of households identified as White, 35% identified as Hispanic, and 20% identified as Black.

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

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

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

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

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

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

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

A significant, but harder to calculate, number of Providence residents face homelessness as a result of exit from a temporary hotel or motel, as they age out of youth services with no place to go - or are living in another person’s home (“doubling up”) as a result of economic hardship. Combining financial assistance (diversion or housing “problem-solving” funding) with appropriate services has proven to be the most effective method at keeping those at risk of housing instability from becoming homeless.

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

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

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

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

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

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

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

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

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

there were 10,347 households on the Providence Housing Authority's Centralized Wait List; 1,446 households were also on the Project Base Vouchers Wait List (households can be on both lists). Those waiting for housing in Providence reflect the City's diversity, with 28% identifying as Black, 40 and 40% identifying as Hispanic.

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

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

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

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

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

Those At risk of Homelessness (QP2) are eligible for some rental assistance in the current landscape of resources – but it is highly limited, and largely subscribed/over-subscribed. The City's HOPWA entitlement funding currently supports 32 households living with HIV/AIDS in the Providence/Fall River/New Bedford Metropolitan Statistical Area with tenant-based rental assistance – with over 300 households on the waitlist. The City's Emergency Housing Voucher Dashboard tells a similar story – 90% of EHV vouchers are currently being used in leased units, with only a handful remaining to be placed (4) out of the entire allotment of vouchers (42).

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

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

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

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

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

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

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

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

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

Supportive Services: The City’s Community Development Division funds a wide array of neighborhood-based support and social community services that are available to those in QP4 – Other Populations Requiring Services or Housing Assistance to Prevent Homelessness, and Other

Populations At Greatest Risk of Housing Instability. From food pantries to job training to housing navigation to eviction defense legal services – Providence has a network of support services among the current resources. While a diversity of services is offered in a variety of languages targeted to neighbors of all abilities and ages, there is an immeasurable need in this qualifying population that cannot be met by the currently available resources.

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

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

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

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

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

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

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

Sheltered and Unsheltered Homeless Population:

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

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

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

Currently Housed at Risk of Homelessness:

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

Families living with housing instability have unique unmet service needs, though many of the same services needed by those experiencing homelessness are again required here – job training

and placement, mental health stabilization and on-going support, low-or no-cost childcare, addiction treatment and management, benefits counseling, and food access. Financial counseling is not often offered in languages or in a nature or location accessible to Providence's low-wage households, and rental assistance programs are under-resourced. Ensuring that these services are properly-resourced, accessible and provided in a culturally competent manner – will ensure that their impact on housing unstable families is maximized.

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

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

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

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

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

As the data illustrates, there remains a significant gap in the transitional and shelter housing available to homeless persons – and the growing need in the state of Rhode Island. A snapshot of the Shelter Queue in HMIS pulled from the Coordinated Entry System in August 2022 counted 1,101 individual people in need of a shelter bed throughout the state of Rhode Island. The 2022 State of Homelessness in Rhode Island report cited a gap of 66 emergency housing units for families in an average month, and a gap of 137 emergency housing units for adults without children in an average month.

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

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

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

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

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

Identify priority needs for qualifying populations:

QP1 - Homeless:

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

QP2 – At risk of Homelessness:

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

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

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

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

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

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

To determine the level of needs and gaps in the City's shelter and housing inventory and service delivery systems, multiple data sources were referenced, including (but not limited to): the state of Rhode Island's Homeless Management Information System – including the 2021 & 2022 Point in Time Count and Housing Inventory Count; American Community Survey and Comprehensive

Housing Affordability Strategy data; the City of Providence's 2021 Anti-Displacement and Comprehensive Housing Strategy; HousingWorks Rhode Island 2021 & 2022 Housing Factbook; Opening Doors – Rhode Island's Strategic Plan to End Homelessness; and annual reports from service providers.

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

HOME-ARP ACTIVITIES

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

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

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

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

Describe whether the PJ will administer eligible activities directly:

The City will not administer any activities directly.

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

Not applicable.

Use of HOME-ARP Funding Table

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

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

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

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

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

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

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

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

HOME-ARP PRODUCTION GOALS

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

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

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

While the HOME-ARP housing production goals won't solve the affordability crisis in the City of Providence, 15-20 new units of affordable housing directly addresses the most significant gap in the current system of housing, shelter, and support services. These units may be made available to the qualifying populations and likely also include units with wrap-around support services. Additionally, with numerous other new funding sources coming online around the state, these HOME-ARP affordable housing funds will almost certainly be paired leverage other sources of both subsidized and private capital to maximize the impact of these funds.

PREFERENCES

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

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

Rental Housing Development:

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

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

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

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

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

Supportive Services:

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

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

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

Rental Housing Development:

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

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

REFERRAL METHODS

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

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

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

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

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

Rental Housing

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

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

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

Supportive Services

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

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

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

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

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

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

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

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

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

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

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

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

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

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

LIMITATIONS IN A HOME-ARP RENTAL HOUSING OR NCS PROJECT

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

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

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

No limitation identified; not applicable.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of the HOME-ARP funds (i.e. through another of the PJ's HOME-ARP projects or activities):

No limitation identified; not applicable.

HOME-ARP REFINANCING GUIDELINES

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

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

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

Attachments:

SF-424

SF-424 B

SF-424 D

HOME-ARP Certifications

Public Notice

HOME-ARP CERTIFICATIONS

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

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and 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, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.


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 subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients 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 and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

3/27/23
Date

MAYOR

Title

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

03/30/2023

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Providence

* b. Employer/Taxpayer Identification Number (EIN/TIN):

056000329

* c. UEI:

L28MEYDFLQ5

d. Address:

* Street1:

444 Westminster Street

Street2:

Suite 3A

* City:

Providence

County/Parish:

Providence

* State:

RI: Rhode Island

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

02903-3215

e. Organizational Unit:

Department Name:

Planning & Development

Division Name:

Community Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mrs.

* First Name:

Emily

Middle Name:

A

* Last Name:

Freedman

Suffix:

Title:

Community Development Director

Organizational Affiliation:

* Telephone Number:

4016808435

Fax Number:

* Email:

efreedman@providenceri.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

*** 10. Name of Federal Agency:**

U.S. Department of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

*** 12. Funding Opportunity Number:**

14.239

*** Title:**

HOME Investment Partnerships Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

City of Providence HOME-ARP Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant **RI-1&2**

* b. Program/Project **RI-1&2**

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date: **04/07/2022**

* b. End Date: **09/30/2030**

18. Estimated Funding (\$):

* a. Federal	5,930,420.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	5,930,420.00

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: **Mr.** * First Name: **Brett**

Middle Name: **P.**

* Last Name: **Smiley**

Suffix:

* Title: **Mayor**

* Telephone Number: **4016805000** Fax Number:

* Email: **efreedman@providenceri.gov**

* Signature of Authorized Representative: **Brett P. Smiley** * Date Signed: **3/28/23**

**Applicant and Recipient
Assurances and Certifications**

U.S. Department of Housing
and Urban Development

OMB Number: 2501-0017
Expiration Date: 01/31/2028

Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant:

***Authorized Representative Name:**

Prefix: Mr. *First Name: Brett
Middle Name: P.
*Last Name: Smiley
Suffix:

*Title: Mayor

*Applicant Organization: City of Providence

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion sex (including gender identity and sexual orientation), disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentally which

is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 6304(d)) and implementing regulations at 24 CFR part 42, subpart A.

7. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

8. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §§3729, 3802).

*Signature:

Brett P. Smith

*Date:

3/27/23

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.


As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) Institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Providence	3/24/23

The Providence Journal

Public Notices

Originally published at providencejournal.com on 03/14/2023

PUBLIC NOTICE

Draft HOME-ARP Allocation Plan –

Available for Public Review

March 14 – March 29, 2023

HOME-ARP - Public Hearing

March 28, 2023 – 5-6pm

The draft City of Providence HOME-American Rescue Plan Act ("HOME-ARP") Allocation Plan is now available for public review and comment on the City of Providence website:

<https://www.providenceri.gov/>

planning/community-development

The Allocation Plan will be available online for public review and comment from Tuesday, March 14 through Wednesday, March 29, 2023. A physical copy of the Allocation Plan can be obtained weekdays between the hours of 8:30am and 4:30pm at the Division of Housing of Community Development (444 Westminster Street, Suite 3A, Providence).

Citizens wishing to submit written comments during the public review and comment period from Tuesday, March 14 to Wednesday, March 29, 2023 may mail them to:

City of Providence Department of Planning & Development

Attention: Emily Freedman,

Director of Housing & Community Development Division

444 Westminster Street, Suite 3A

Providence, RI 02903 OR

via email to: efreedman@providenceri.gov

The City was awarded \$5,930,420 in one-time HOME-ARP funds; the current draft Allocation Plan recommends the City use those funds to build affordable housing and provide supportive services to qualifying populations. This draft Allocation Plan is required by HUD to receive these funds and serves as a strategic plan, identifying housing and service needs of HOME-ARP qualifying populations, and outlining potential strategies to reduce homelessness and increase housing stability using these funds. HUD grantees must submit these plans as amendments to their FFY21 Annual Action Plans.

Prior to submission of the draft Allocation Plan, the City will hold a Hybrid Public Hearing (in an effort to broaden public participation) from 5-6PM on Tuesday, March 28, 2023. The Public Hearing can be joined either in person (in the 1st Floor Conference Room of 444

Westminster Street) or online via Zoom: <https://providenceri-gov.zoom.us/j/87290846666> or join by phone: +1 646 876 9923 or 877 853 5257 (Toll Free); Webinar ID: 872 9084 6666

In accordance with the provisions of the Americans with Disabilities Act (ADA), persons with disabilities requiring special accommodations to participate in this hearing will be accommodated and should contact 401-680-8400 (TTY 401-680-5220) at least 48 hours prior to the scheduled meeting date. Translation and/or interpretation services are available upon request.

Por favor, para solicitar servicios de traducción, llame a Xiomara Gonsalves al 401-680-8404 al menos 48 horas antes de la fecha de la reunión programada. To request translation services, please call Xiomara Gonsalves 401-680-8404 at least 48 hours prior to the scheduled meeting date.

March 14, 2023