City of Providence Consolidated Plan 2011-2013

May 2010

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City of Providence
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I. Executive Summary

The Consolidated Plan is a collaboration in which our City establishes a unified vision for community development actions. It provides the opportunity for the City of Providence to shape the housing and community development efforts over the next five years into an effective, coordinated strategy. This strategy must meet the program goals of creating viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities principally for low-moderate income persons. The City receives approximately $11 million in HUD funds annually to be used for housing and community development activities. These funds will be combined with other city, state, and federal funds to leverage sufficient resources to achieve our vision.

Vision

Investments made under City of Providence Consolidated Plan grant programs will support the development of an environmentally sustainable city with thriving, diverse neighborhoods offering an array of housing, economic, employment, social service, educational, transportation, cultural, and recreational opportunities that address the needs of, and are accessible to, all City of Providence residents.

Investments made under Consolidated Plan grant programs will seek to support the preservation and development of diverse affordable housing opportunities – ownership and rental – that meet the evolving needs of residents while supporting overall neighborhood development and revitalization.

Investments will recognize the imperative of addressing the impact of rising foreclosures, vacancies, and the related deterioration of the existing housing stock in the City of Providence.

As the demand for resources exceeds supply, the City will seek to align investments – those covered by the Consolidated Plan as well as those with other funding streams – to maximize the positive impact on quality, appropriate housing opportunities with a special focus on remediating health and safety issues and achieving maximum energy efficiency and reducing carbon and greenhouse gas emission and other environmental impacts.

By supporting an efficient, evolving, and responsive social service network that meets the diverse needs of residents, the City will promote the economic mobility of those who live in the City of Providence and ensure the opportunity for those individuals to remain active, contributing members of the Providence community.

Investments made under the Consolidated Plan will support integrated social service and legal advocacy and representation delivery system that meet the needs of residents with varying educational, developmental, and skill levels, and offer opportunities for residents to advance and build assets – professional, educational, financial and otherwise.

Grant making decisions will recognize the increased benefit to participants, and increased return on investment for the City, realized when adult education and education of youth out of the traditional education system, is integrated with financial literacy and with workforce development aligned with overall economic development of the City – training residents for targeted sectors where employer needs are high, thus increasing the likelihood of employment for residents and increasing the supply of trained workers for the benefit of employers.

Affordable Housing Goal 3: Provide lead abatement services to eligible low-income rental and ownership households.

Affordable Housing Goal 4: Provide support services that educate renters and promote housing rights.

Special Needs Population Goal 1: Assist special needs populations with supportive services, facilities and housing needs.

Special Needs Population Goal 2: Assist persons living with HIV/AIDS to achieve and maintain a high standard of living and satisfactory health status.

Special Needs Population Goal 3: Assist persons who are homeless or who are at-risk of becoming homeless.

Special Needs Population Goal 4: Assist low-income and special needs populations with supportive services to increase self-sufficiency.

Community Development Goal 1: Develop a workforce for 21st Century jobs.

Community Development Goal 2: Help small businesses grow and prosper through financing and technical assistance to improve the economic viability of neighborhoods and promote the creation/retention of jobs.

Community Development Goal 3: Continue neighborhood revitalization efforts.

Community Development Goal 4: Work with non-profits and neighborhood organizations to build community capacity.

Purpose of the Consolidated Plan

The purpose of the Consolidated Plan is:

1. To identify the city's housing and community development (including neighborhood and economic development) needs, priorities, goals and strategies; and
2. To stipulate how funding will be allocated to housing and community development activities.

In addition to the three year Consolidated Plan, the City is required to complete two reports annually, which specify how the City proposes to allocate the funds (Annual Action Plan) and how the City has spent its federal funds (Consolidated Annual Performance and Evaluation Report-CAPER). Finally the City is required to examine barriers to fair housing choice and develop a plan to mitigate such barriers (Analysis of Impediments to Fair Housing-AI).

This report is the FY2011-2013 Three-Year Consolidated Plan for the City of Providence. This Consolidated Plan contains an analysis of demographic and economic conditions in the City, a review of housing conditions and affordability, and an analysis of housing and community development needs, including needs of special population groups.

Compliance with Consolidated Plan Regulations

The City of Providence 2011-2013 Consolidated Plan was prepared in accordance with Sections 91.100 through 91.230 of the U.S. Department of Housing and Urban Development's (HUD) Consolidated Plan regulations.

Organization of Report

The three-year Consolidated Plan serves as the planning document for setting priorities for allocating funding received under federal programs throughout the City of Providence. Using HUD guidelines, the Providence Consolidated Plan is organized into these major sections:

I. Executive Summary
II. HUD Requirements
III. Community Profile
IV. Housing Market Analysis
V. Analysis of Impediments to Fair Housing
VI. Housing and Non-Housing Needs for Special Need Populations
VII. Housing and Community Development Needs
VIII. 2011-2013 Strategic Plan
IX. Appendices

Lead and Participating Organizations

The Providence Department of Planning and Development (DPD), is the lead agency and administers the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs. The Providence Economic Development Partnership is responsible for small business lending and the Providence Housing Authority (PHA) oversees public housing in the City.

Coordination with Other Efforts

The DPD has been laying the foundation for the new Three-Year Consolidated Plan through the development of several supporting g efforts. The efforts most closely related to the Consolidated Plan include Providence Tomorrow: The Comprehensive Plan, Pathways to Opportunity, GreenPrint Providence, and the Providence Tomorrow neighborhood plans.

II. HUD Requirements

This section summarizes the process the City of Providence took in preparing its Consolidated Plan and Action Plan submission to HUD. The description of the management of the process, citizen participation, institutional structure, monitoring and other HUD requirements outlined in this section fulfill or partially fulfill Sections 91.200, 91.215, and 91.230 of the Consolidated Plan regulations.

Past Performance

Since the previous analysis was conducted in 2005, many of the goals and objectives of the previous plan have been achieved. Providence met or exceeded all of its program goals in 2009 for projects that have a one year cycle. Providence made steady progress in meeting its 2009 goals and objectives. Programs that had a one-year cycle met or exceeded program goals. Other programs, notably in housing and economic development, can take up to three years to implement. Consequently, one-year accomplishments for these projects have not yet been met. However, the projects have continued as planned, and will attain stated goals once they are completed and placed in service.

Managing the Process

The City of Providence has embraced a process for the development of this three-year consolidated plan that included broad participation from the community. This process began with Providence Tomorrow: The Comprehensive Plan, which was adopted in 2007 and has continued through the preparation of this document, and will remain in effect throughout the upcoming three-year period through the Citizen Participation Process outlined below. At each step in the process, care has been taken to ensure that low-income and moderate-income residents, members of minority groups, agencies involved in the provision of services to these populations, and others who are directly impacted by the programs and projects supported by the Consolidated Plan have been actively involved. The implementation of Providence's 2011-2013 Consolidated Plan, required by HUD, will be done in collaboration with City agencies, other public institutions, non-profit organizations and private industry.

Lead Agency

The Providence Department of Planning and Development (DPD), is the lead agency and administers the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs. The Providence Economic Development Partnership is responsible for small business lending and the Providence Housing Authority (PHA) oversees public housing in the City.

The department has regular contact with citizens, businesspersons, and service providers, as well as program beneficiaries. All of the public contact results in input to City goals, needs assessments, program development and implementation. Many City agencies whose funds are not covered by the Consolidated Plan will continue to be part of the development and implementation of the Consolidated Plan and annual Action Plans including Inspection and Standards, Public Works, Parks and Recreation, the Pathways to Opportunity office, and the Human Resources Commission.

Development of the Plan

Providence's Consolidated Plan is developed through a collaborative process with the Providence Public Housing Authority and numerous other agencies. Citizen participation is another important part of the Consolidated Plan, including developing and revising the plan, as well as commenting on program performance. As part of the Consolidated Planning process information on the housing and community development needs of Providence citizens was gathered through five public focus group meetings and stakeholder/key person interviews. A thirty day comment period was held during April and May 2010 to allow the public to review and comment on the draft 2011-2013 Consolidated Plan.

Institutional Structures and Coordination/Collaboration with other Agencies

The City of Providence will partner with many non-profit and for-profit entities to carry out the goals and activities of the Consolidated Plan including the Providence Housing Authority and many local social service providers.

DPD proposes housing and community development policy and serves as a source of funds and technical assistance to entities within the community who work in the housing and community development field. As part of the annual CDBG, HOME/ADDI, ESG, and HOPWA allocation process Providence holds public meetings where residents and service providers of Providence provide input regarding the priority needs of the community. DPD reviews the applications with the priority needs of the Consolidated Plan and the needs of the city in mind, and funding recommendations are then made to the Mayor and City Council.

Throughout the year, DPD administers the funds, provides technical assistance and monitors the agencies that are awarded funding. All subrecipients are required to enter into agreements with the City, outlining procurement, environmental, labor, wage and other federal requirements. The agencies are also required to complete program evaluation outcome reports.

Coordination with the Providence Housing Authority

PHA continues to be involved in the planning, coordination and development of the Consolidated Plan to maximize affordable housing and neighborhood revitalization efforts in the City of Providence. A representative from PHA sits on the Consolidated Plan Steering Committee that oversees the development of the Consolidated Plan through regular meeting attendance and participation, technical assistance and agency data, and reporting of the Consolidated Plan.

Coordination with Nonprofit Organizations

There are many participants from the non-profit sector who provide a broad variety of housing, economic and social service programs that serve many community needs. These include community development corporations (CDCs), other non-profit housing developers, non-profit service providers, human services and shelter providers, organizations working with special needs populations, and community-based organizations. Most of these organizations are funded through a combination of public and private sources.

Strengths and Gaps of the System

The City of Providence is committed to meeting the underserved needs in the community. The City has benefited by having appropriate and motivated service providers working in Providence. Coordination of various aspects of the Consolidated Plan implementation with other agencies and organizations will be performed by the City.

The primary gap in the delivery of services is the lack of adequate financial resources, staff and operational funds to best serve the City's populations in need. Because of this, DPD through its grant-making, will seek to increase partnerships, coordination of service delivery among agencies, and where appropriate facilitate mergers and other organizational changes to increase efficiencies and reduce unmet demand for services.

Geographic Area of Focus

The City recognizes that vibrant neighborhoods are the building blocks of a healthy city and as such the City recently undertook a three-year neighborhood planning process known as Providence Tomorrow. The holistic neighborhood plans which were the result of this process identified goals, strategies and actions to help move each city neighborhood forward in a positive direction. This is especially true for neighborhoods in the southern and western quadrants of the City, where the need for neighborhood revitalization is considerable.

The southern and western quadrants of the City roughly coincide with areas of minority and ethnic concentration in the City. All the proposed activities and projects are intended to benefit residents of Providence who have extremely low-, low- and moderate-incomes, and populations that have special needs, such as the elderly, unaccompanied homeless youth, the disabled and HIV/AIDS individuals and families. Consequently, many of the activities and projects that result from the Consolidated Plan will be targeted to neighborhoods south and west of downtown Providence, as well as the Mt. Hope neighborhood, which is a low- income neighborhood on the East Side of Providence, geographically isolated from other focus areas.

Citizen Participation

The City of Providence, Department of Planning and Development, has been laying the groundwork for the new three-year consolidated plan through the development of several supporting efforts. The efforts most closely related to the Consolidated Plan include Providence Tomorrow: The Comprehensive Plan, GreenPrint Providence, the Providence Tomorrow neighborhood plans, and Pathways to Opportunity.

The Consolidated Plan and Action Plan were developed with a strong emphasis on community input. Public outreach for the Consolidated Plan included a steering committee of housing, community development and other non-profit agencies and professionals in the City, a series of five focus groups and selected stakeholder interviews.

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III. Community Profile

Population and Household Characteristics

Providence is the largest municipality in the State of Rhode Island, with a 2000 Census population estimate of 173, 618. The 2006-2008 American Community Survey (ACS) estimated the city's population at 169, 635.

Population Growth

During the 1990's and early 2000's, Providence experienced strong population growth. The primary driver of the City's population growth during this time was new residents moving into Providence, primarily Hispanic immigrants. Since the middle of the last decade, net migration has been negative, resulting in a population decrease of almost 4,000 people from the 2000 Census.

Race and Ethnicity

Data on race and ethnicity requires an introduction on how the U.S. Census (Census) collects and analyzes the data. The Census asks two different questions about race and ethnicity; the first question asks respondents to identify their race; the second asks whether or not the respondents are of Hispanic/Latino origin. The Census does not classify Hispanic/Latino as a race, but rather as an identification of origin and ethnicity. If a person reports a Hispanic/Latino ethnicity but does not mark a specific race category, they are classified in the "Some Other Race" category. Nationally, persons of Hispanic/Latino descent most commonly report their race as White or Some Other Race. Exhibit II-1 presents race and ethnicity data for Providence residents in 2000 and in 2008 (based on the ACS). As shown in the exhibit, the majority of Providence residents are white with 48.45 identifying as such in 2008. The next largest racial categories are Some Other Race at 26.23 percent and Black or African American at 14.49 percent. A little more than one-third (37.6%) of Providence's population identified themselves as of Hispanic/Latino descent in 2008.

Exhibit III-1: Race and Ethnicity, City of Providence 2000 and 2008

Race and Ethnicity					
	2000		2008		%
Race	Population	% of population	Population Estimate	% of population	change 00 -08
Total:	173,618	100	169,635	100	-2.29
White alone	94,666	54.5	82,190	48.45	-13.18
Black or African American alone	25,243	14.5	24,579	14.49	-2.63
American Indian and Alaska Native alone	1,975	1.1	1,537	0.91	-22.18
Asian and Pacific Islander	10,702	6.2	9,636	5.68	-9.96
Some Other Race	30,477	17.6	44,499	26.23	46.01
Two or more races:	10,555	6.8	7,194	4.24	-31.84
Ethnicity					
Hispanic/Latino	52,146	30	63,778	37.6	22.3
Non-Hispanic/Latino	121,472	70	105,857	62.4	-14.75

Source: U.S. Census Bureau 2000 Decennial Census, 2006-2008 American Community Survey

Linguistically Isolated

The 2006-2008 ACS collected information on "linguistically isolated "persons, defined as a person over the age of 5 who speaks a language other than English and speaks English less than "very well." In Providence, 38,558 people (24.5% of the population) were linguistically isolated in 2008.

Familial Status

In 2008, the majority of Providence households were households with children (56.7%). Of households with children, most were married-couple families. Exhibit III-2 shows the breakdown of Providence families with and without children for 2000 and 2008. It should be noted that "households with children" does not distinguish between children who are related (by birth or adoption) to the adults in their household and those who are not related.

Exhibit III-2: Household Characteristics, City of Providence, 2000 and 2008

	Number of Households 2000	2008	Change 2000 to 2008 Number	%
Households with children:				
Married couples	10,378	18,562	8,184	44
Female-headed households	9,800	11,919	2,119	17.7
Male-headed households	1,763	3,069	1,306	42.5
Subtotal	21,941	33,550	11,609	34.6
Households without children:				
Subtotal	40,239	25,623	-14,616	-57
Total	62,180	59,173	-3,007	-5

Source: U.S. Census Bureau 2000 Decennial Census, 2006-2008 American Community Survey

Single Parent Households

The 2008 ACS reported a total of 14,998 single-parent households in Providence, approximately 25% of the City's total households. The majority of the single-parent households, 79%, were female-headed.

Large Households

Large households, as defined by the Census, have five or more people living in one household. Large households made up about 12.75% of the total households in Providence. The tendency for households to be large varies by race and ethnicity: four percent of households whose race was designated as White had five or more persons in their household. Almost four percent of households designated as Other Race Alone had five or more persons in their household. Similarly, approximately 6.3 percent of Hispanic/Latino households were classified as large in 2000.

Unmarried Partner Households

According the census, an unmarried-partner household is a "household in which the householder and his or her partner are not legally married or participating in a common-law marriage." An unmarried partner is "a person who is not related to the householder, who shares living quarters with, and who has a close personal relationship with the householder." Therefore, the definition of unmarried-partner households includes same-sex as well as opposite sex unmarried partners. The 2008 ACS reported a total of 4,390 unmarried-partner households in Providence, representing seven percent of the City's total households.

Exhibit III-4: 2000 Income Distribution by Household Type

Income Levels	Families		Non-Family		Total	
	Number	%	Number	%	Number	%
Less than 10,000	5,419	15	8,613	32.9	13,430	21.5
$10,000-$14,999	3,423	9.5	2,944	11.3	6,173	9.9
$15,000-$24,999	5,702	15.8	4,279	16.4	9,749	15.6
$25,000-$34,999	4,553	12.6	3,064	11.7	7,842	12.6
$35,000-$49,999	5,481	15.1	2,971	11.4	8,704	14.
$50,000-$74,999	5,429	15	2,439	9.3	8,143	13.1
$75,000-$99,999	2,792	7.7	1,005	3.8	3,917	6.3
$100,000-	1,757	4.9	416	1.6	2,312	3.7
$150,000-	664	1.8	194	0.74	861	1.4
$200,000 or more	967	1.6	215	0.82	1,196	1.9
Total	36,187	100	26,140	100	62,327	100
Median Income	$32,058		$18,130		$26,867	

Source: U.S. Census Bureau 2000 Decennial Census

Exhibit III-5: 2008 Income Distribution by Household Type

Income Levels	Families		Non-Family		Total	
	Number	%	Number	%	Number	%
Less than 10,000	2,957	8.8	6,180	24.1	9,137	15.4
$10,000-$14,999	2,407	7.2	2,571	10	4,978	8.4
$15,000-$24,999	4,265	12.7	3,067	12	7,332	12.4
$25,000-$34,999	4,043	12.1	2,939	11.4	6,982	11.8
$35,000-$49,999	4,808	14.3	2,825	11	7.633	12.9
$50,000-$74,999	6,011	17.9	3,701	14.4	9,712	16.4
$75,000-$99,999	3,619	10.8	1,853	7.2	5,472	9.2
$100,000-	3,049	9.1	1,478	5.8	4,527	7.7
$150,000-	1,153	3.4	465	1.8	1,618	2.7
$200,000 or more	1,238	3.7	544	2.1	1,782	3
Total	33,550	100	25,623	100	59,173	100
Median Income	$43.477		$26,144		$36,298	

Source: 2006-2008 American Community Survey

Households in Poverty

The poverty threshold is established at the federal level and is updated annually. It is adjusted for household size but not by geographic area, except for Alaska and Hawaii (therefore the poverty threshold is the same in Providence, Rhode Island as it is in Phoenix, Arizona.) In 2008, the poverty threshold for a family of four was $21,200.

In 2008, 26 percent of the Providence population, or about 44,105 people, lived below the poverty threshold. The poverty rate is highest for Providence's children: over one-third live in poverty or an equivalent of 19,190 children in 2008. Poverty rates are lowest for the City's seniors at 21.4 percent. Exhibit III-6 shows the percentage of Providence's population living in poverty by age cohort.

Exhibit III-6: Poverty by Age, City of Providence 2008

Age	Number	% of Age Group
Under 5 years	4,672	38.8
5 to 17	10,189	34.5
18 to 24	7,893	25.2
25 to 34	5,402	19.2
35 to 44	3,693	17.2
45 to 54	3,494	17.6
55 to 64	2,651	20
65 to74	1,543	21.6
75 and over	1,391	19

Source: 2006-2008 American Community Survey

Exhibit III-7 shows poverty rates by family type. Single female-headed households have the highest incidence of poverty: 40 percent of these households lived in poverty in 2008. Single male headed households with children and married couples with children have the lowest poverty rates.

Exhibit III-7: Poverty by Family Type, City of Providence 2008

Family Households	Families	Percent of Family Type
Married Couple	**1,600**	**8.6**
With Children	527	5.8
Without Children	1,073	11
Male Householder, No Wife Present	**428**	**13.9**
With Children	79	2.6
Without Children	349	11.3
Female Householder, No Husband	**4,857**	**40.7**
With Children	307	2.5
Without Children	4,550	38
Total Families in Poverty	**6,885**	**20.5**

Source: 2006-2008 American Community Survey

Exhibit III-8 examines poverty by race and ethnicity as of 2008. As shown in the exhibit, most families living below the poverty level in Providence are racially classified as Some Other Race (48 percent of households earning less than $21,200), followed by those classified as White (32.3 percent) and Black/African American (14 percent). Just over three-quarters of family households that earned less than $21,200 were of Hispanic origin.

Exhibit III-8: Households with Incomes Less than $21,200 by Race & Ethnicity, City of Providence 2008

	Family Households	Percent of All Races/Ethnicities	Percent of All Households	Percent of Race/Ethnic category
Race				
White	2,165	32.3	3.6	14.4
Black/African American	947	14	1.6	18.4
American Indian/Alaska	0	0	0	0
Asian	379	5.6	0.64	21
Some Other Race	3,226	48	5.5	31.5
Total	**6,717**	**100**	**11.3**	**20**
Ethnicity				
Hispanic	4,135	77.4	23.1	30.2
Non-Hispanic	1,204	22.5	20.3	10
Total	**5,339**	**100**	**43.4**	**16**

Source: 2006-2008 American Community Survey

Compared to the distribution of all of Providence's households by race, households that earned less than $21,200 in 2008 were disproportionately likely to be minorities, primarily Hispanic and Some Other Race.

Education

In 2008, 35 percent of Providence's residents were enrolled in school. As shown in Exhibit III-9, the majority of the school population was enrolled as undergraduates in college, followed by students enrolled in grades 9 through 12.

Exhibit III-9: School Enrollment by Level of School, City of Providence, 2008

	Population	Percent of Total Population	Percent of School Enrollment
Enrolled in Nursery School, Preschool	2,252	1.3	3.8
Enrolled in Kindergarten	2,430	1.4	4.1
Enrolled in Grade 1 to Grade 4	8,217	4.8	14
Enrolled in Grade 5 to Grade 8	8,810	5.2	15
Enrolled in Grade 9 to Grade 12	9,157	5.4	15.5
Enrolled in College, Undergraduate	22,929	13.5	39
Graduate or Professional School	4,993	2.9	8.5
Total Enrolled in School	**58,788**	**35**	**100**
Not Enrolled in School	**110,847**	**65**	

Source: 2006-2008 American Community Survey

Exhibit III-10 details school enrollment by private or public school. The right hand column shows the percentage of children who are enrolled in public or private school for each grade level. That is, 73.4 percent of children in Kindergarten are enrolled in public school, 26.5 percent are enrolled in private school. The proportion of Providence children enrolled in public school is relatively consistent across grades 1 to 12, with 85 to 87 percent enrolled in public school.

Exhibit III-10: School Enrollment by Age and Type of School, City of Providence 2008

Enrolled in Public School	**Population**	**Percent of Grade Level**
Nursery School	1,248	55
Kindergarten	1,785	73.4
Grade 1 to Grade 4	7,004	85.2
Grade 5 to Grade 8	7,607	86.3
Grade 9 to Grade 12	8,019	87.5
College Undergraduate	8,896	38.8
Graduate or Professional	1,012	20.2
Total	**36,216**	
Enrolled in Private School	**Population**	**Percent of Grade Level**
Nursery School	1,004	44.5
Kindergarten	645	26.5
Grade 1 to Grade 4	1,213	14.7
Grade 5 to Grade 8	1,203	13.6
Grade 9 to Grade 12	1,138	12.4
College Undergraduate	14,033	61.2
Graduate or Professional	3,981	79.7
Total	**23,217**	

Source: 2006-2008 American Community Survey

According to the 2008 ACS, approximately 30 percent of Providence's population over the age of 25 have earned a Bachelor's degree or higher. Another 18 percent have Some College or an Associate's degree. A High School Diploma or Equivalency is the highest educational level of 24 percent of the Providence population. Exhibit III-11 displays the educational attainment for residents aged 25 or older in Providence.

Exhibit III-11: Educational Attainment for the Population Over the age of 25 years, City of Providence, 2008

	Population	Percent of Population
No Schooling Completed	3,085	3.1
Nursery to 4th Grade	3,088	3.1
5th Grade to 8th Grade	8,523	8.8
9th Grade to 12th Grade (No Diploma)	11,774	12.1
High School Graduate (Includes Equivalency)	23,681	24.4
Some College, No Degree	12,973	13.3
Associate's Degree	4,734	4.9
Bachelor's Degree	16,437	17
Master's or Professional Degree	10,322	10.6
Doctorate Degree	2,332	2.4
Total Population Over 25 Years	**96,949**	**100**

Source: 2006-2008 American Community Survey

Employment

The Rhode Island Department of Labor and Training estimates the 2009 employment in Providence at approximately 79,000. Historically, the unemployment rate in Providence has been slightly higher than the rest of Rhode Island. This continues to be true to through the current recession. In 2005, during the writing of the last Consolidated Plan, Providence had an unadjusted unemployment rate of 4.6 percent, compared to the state unemployment rate of 3.8 percent at the same time. As of December 2009, Providence had an unadjusted unemployment rate of 14.2 percent, higher than the state unemployment rate of 12 percent. It is clear from these numbers that the economy in Providence has declined over the past five years.

Exhibit III-12: displays employment in Providence by industry. The data shows the number of jobs by industry and excludes sole proprietors, elected officials, student workers, church employees and sales/real estate/insurance positions that are paid by commission.

Exhibit III-12: Employment in the City of Providence by Industry, 2008

NAICS Industry Sector	Providence	State of RI	Percent of State Total
Agriculture, Forestry, Fishing & Hunting	*	781	
Mining	*	221	
Utilities	539	1,111	48.51
Construction	2,659	20,369	13.05
Manufacturing	5,728	47,942	11.95
Wholesale Trade	2,426	16,883	14.37
Retail Trade	6,977	49,630	14.06
Transportation & Warehousing	672	9,414	7.14
Information	3,851	10,671	36.09
Finance & Insurance	5,503	25,081	21.94
Real Estate & Rental & Leasing	1,574	6,462	24.36
Professional & Technical Services	6,664	21,643	30.79
Management of Companies & Enterprises	1,846	9,299	19.85
Administrative Support & Waste	7,380	23,922	30.85
Educational Services	11,531	18,799	61.34
Health Care & Social Assistance	24,707	76,511	32.29
Arts, Entertainment, & Recreation	1,107	8,050	13.75
Accommodation & Food Services	8,571	42,833	20.01
Other services (except Public	4,488	18,250	24.59
Unclassified Establishments	*	30	
Total Private Industry Employment	**96,230**	**407,900**	
* Some data are not shown due to the possibility of identifying data of a specific			

Source: RIEDC Data compiled June 2009, subject to revision.

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The primary treatment for lead poisoning is to remove the child from exposure to lead sources. This may involve moving the family into permanent lead-safe housing. However, it is possible for home repairs to be done safely while the family remains in the home or the family maybe temporarily relocated while repairs are completed. Lead-safe housing is the primary means by which childhood lead poisoning can be prevented.

Households with lead-based paint risk

Approximately 88 percent of Providence's housing stock was built prior to 1978, when lead-based paint was banned in residential uses. The extent to which lead-based paint is a hazard in these housing units depends on if there has been mitigation (removal, repainting). Inadequately maintained homes are more likely to suffer from a range of lead hazard problems, including chipped and peeling paint and weathered window surfaces.

According to Rhode Island Kids Count 2,916 children in Providence were tested for lead paint in 2009. Of those children, 215 (7.4%) had lead levels of 10mcg/dL or greater. This is an increase over the numbers in 2005, when 6.2% of children tested in Providence had confirmed elevated lead levels in their blood.

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V. Analysis of Impediments to Fair Housing

This analysis was conducted by the City of Providence Department of Planning and Development (DPD). DPD used existing reports and studies, including the 2005-2010 Consolidated Plan, Providence Neighborhood Profiles, the most recent Analysis of Impediments to Fair Housing for Providence (2005), 2000 Census Data, 2008 American Community Survey Data, the Providence Housing Policy Report, and the Providence Zoning Ordinance among others. Interviews were conducted with DPD staff members who work in the Housing Division, the Providence Public Housing Authority, and staff members from non-profit organizations that are involved in housing issues. The City created a Steering Committee to provide input and guidance for the Analysis of Impediments (AI). A series of five focus groups was also held to solicit input on fair housing issues.

Methodology

In addition to the collection and analysis of information described above, the City utilized focus groups. To solicit maximum input from the public, a series of five focus groups held in various neighborhoods in Providence. An advertisement was placed in the following newspapers to inform all residents of Providence of the public focus groups. The Providence Journal, The Providence American, and Providence en Espanol (ad placed in Spanish). Attendance at the meetings included a mixture of residents, staff from non-profit housing organizations, staff from other non-profit service providers, and City staff. The City provided Spanish language interpreter services at all focus group sessions.

The most recent versions of pertinent studies and reports were reviewed for this AI. Data sources include the 2005-2010 Consolidated Plan, Providence Tomorrow: The Comprehensive Plan, Providence Tomorrow Neighborhood Plans, the 2005 AI for Providence, 2000 Census data, 2008 American Community Survey data, and the Providence Zoning Ordinance.

The specific methodology used in the AI was to research the data sources available to get an overall picture of Providence and its residents. The DPD then interviewed private, City and State professionals involved in affordable housing issues. The focus group process was conducted concurrently with other research to get resident input on issues affecting fair housing.

Citizen Participation

Focus group sessions were held in Providence as a citizen participation technique of the AI and the Consolidated Planning process. During the writing of the 2000-2005 Consolidated Plan, the City determined that this technique was highly effective in eliciting quality citizen participation and collective problem solving for the AI/Consolidated Plan. The City used the focus group methodology during the 2005-2010 AI/Consolidated Plan process as well; therefore, the decision was made to once again use focus groups to increase public participation in the planning process. The focus groups were divided into five main categories and the AI/Fair Housing issues were discussed in each session. The specific areas were Fair and Healthy Housing, Social Services, Neighborhood Revitalization and Economic Development, HOPWA, and Homeless and Other Special Needs. Each session was held in a different Providence neighborhood.

A series of questions specific to the theme of each focus group were presented at each meeting to facilitate discussion. Within the framework of each agenda, room was left for discussion and analyses to glean what the attendees felt were the most important issues. The City invited all agencies and organization with interests in the theme of each focus group to the sessions. An advertisement was placed in newspapers in Providence inviting residents to attend the focus groups. Advertisements were placed in The Providence Journal, The Providence American, and Providence en Espanol (advertisement

placed in Spanish). Information for all focus groups was included in the advertisement, as was a brief explanation of the Consolidated Plan, to inform residents of the planning process and allow them to choose the issues to which they wished to contribute. During the writing of the 2011-2013 Consolidated Plan, each focus group had 4 to 8 participants. This is less successful than the focus groups for the 2005-2010 focus groups, which each had 10 to 15 participants.

Funding for the Analysis of Impediments

The costs of this analysis were paid from the City of Providence's Community Development Block Grant.

Jurisdictional Background Data

The majority of demographic data pertaining to Providence can be found in the Community Profile chapter of the 2011-2013 Consolidated Plan.

Demographics

At the time of the 2000 Census, Providence's population was 173,618. According to the 2008 ACS, the population has declined to169, 635, a decrease of 2.3 percent. New growth has declined significantly since 2005 due to the economic climate and the housing market collapse. One of the most significant changes in Providence since 1980 has been the increase in foreign and minority domestic immigration. This trend continues with a 22.3 percent increase in the Hispanic/Latino population from 2000 to 2008. In 2000, 52,146 people identified as Hispanic/Latino, in 2008, 63,778 people identified as Hispanic/Latino.

Income Data

In 2000, the median family income in Providence was $32,058. According to the ACS, the 2008 median family income was $43,477, an increase of 26 percent.

Employment Data

The Rhode Island Department of Labor and Training reported that the unemployment rate for Providence in December 2009 was 14.2 percent, higher than the state rate of 12 percent for the same month. These rates are significantly higher than at the writing of the last AI and reflect the impact that the recession has had on employment in Providence specifically and on Rhode Island as a whole. At the time of the writing of the 2005 AI, the Providence unemployment rate was 4.6 percent compared to the state unemployment rate of 3.8 percent.

Housing Profile

The 2000 Census indicated there were 62,389 occupied housing units in Providence. The 2008 ACS estimated that there were 59,173 occupied housing units in the city. Approximately 62.5 percent of the occupied housing units are occupied by renters, with the remaining 37.5 percent being owner occupied units.

The 2008 ACS estimates that there are 69,011 total housing units in Providence with 59,173 of those units occupied at the time of the survey. This gives the city an overall housing occupancy rate of almost 86 percent (85.7). This is a decrease from the occupancy rate at the time of the 2000 Census which was 91.8 percent. The current occupancy rate of 85.7 percent is even less than the 86.7 percent occupancy rate identified by the 1990 Census. With the decline in Providence's population and the increase in housing units over the past eight years, an increase in vacant housing has occurred.

This increase in vacant housing units is a noteworthy decline for the City. This increase in vacancies can be partially explained by a combination of factors: increased rental units, foreclosures of single and multi-

family buildings, and residents moving out of Providence due to the economy have all contributed to the increase in vacancy rates.

The Providence Department of Inspections and Standards (DIS) last updated their vacant and abandoned property list in April and May of 2008. At that time there were 957 vacant or abandoned structures (inclusive of residential, commercial, and industrial) in the City. The majority of the vacant structures are located in minority-concentrated neighborhoods. The West End, Upper and Lower South Providence, Olneyville, Valley, Federal Hill, Hartford, Silver Lake, South Elmwood, Washington Park and Smith Hill neighborhoods contain 73 percent of the vacant and abandoned structures.

The Rhode Island Housing Rent Surveys for 2007 and 2008 indicate that rents continued to rise during the first part of the recession. Only one City neighborhood, Federal Hill, saw a decline in the average prices asked for rent. Rent survey numbers for 2009 are not yet available, but is anticipated that there will have been declines requested rents in some but not all Providence neighborhoods.

According to building permit data collected by the Census, the number of permits issued in Providence between 2005 and 2008 varied widely. In 2005, 65 permits were issued for all residential building types, in 2006, 221 permits were issued. In 2007, 111 permits were issued and in 2008, only 25 permits were issued. 2006 was the peak of the housing bubble in Providence, 2007 started the decline and by 2008, residential construction had almost ceased in the City.

Evaluation of Jurisdictions Current Fair Housing Legal Status

Secretary of Department of Housing and Urban Development (HUD) Findings and Charges
There have been no Fair Housing Complaints or compliance reviews where the Secretary of HUD issued a charge or made a finding of discrimination against the City of Providence.

Fair Housing Discrimination Lawsuits in Providence
There have been two court cases in Providence regarding Fair Housing practices. Both cases went to trial in 1991. The cases are referred to as BASIC 1 and BASIC 2, for Project BASIC, an advocacy organization that was the plaintiff in both cases. The rulings of the cases resulted in the signing of a Consent Decree on April 23, 1991. The Consent Decree was dismissed by the Court on May 9, 2007.

Identification of Impediments to Fair Housing Choice

Focus Groups and Interviews
The five focus groups addressed the following issues: Fair and Healthy Housing, Neighborhood Revitalization and Economic Development, HOPWA, Homeless and Other Special Needs Housing, and Social Services. The following is a brief overview of the focus group discussions. The focus groups are discussed in more detail in the Consolidated Plan for 2011-2013.

Fair and Healthy Housing

This focus group highlighted the following impediments to fair housing: housing with lead paint issues, cost of rent, non-code-compliant apartments, the high cost of getting into apartments (first and last month's rent, security deposits). The foreclosure crisis has also led to an increase in tenant evictions when a landlord has gone into foreclosure but continued to collect rent from the tenants, leading to short-term housing issues. As in 2005, concerns were also raised about landlords not renting to families with children due to lead paint issues and landlords renting to college students who can afford to pay more for larger apartments than families can.

Neighborhood Revitalization and Economic Development

This focus group highlighted the following neighborhood revitalization and economic development issues as impediments to fair housing in Providence: High crime and blighted housing on many streets, particularly in the West End neighborhood, were cited as detriments to neighborhood revitalization. Much discussion was held on the cleanliness of the city and how people don't want to invest in run-down-looking neighborhoods. Several participants stated that "looking better leads to being better." Improvements to street infrastructure, more trees, organized green space, additional trash barrels (and a regular emptying schedule for them), street furniture, better lighting, the need for bike racks and better bus shelters were all pointed out as neighborhood revitalization needs. Several residents also expressed their desire for a resurgence of the "Keep Providence Beautiful" campaign as a neighborhood revitalization tool.

On the economic development side, the need for good paying jobs and additional job training was a major discussion. Residents expressed a need for more programs teaching the traditional trades to Providence youth. They also expressed a desire to see job training and more opportunities for green jobs. Other issues raised were the need to improve the educational system so Providence youth have better opportunities for high paying jobs in the future, and the need for summer job training programs for Providence students, to expose them to different opportunities. Also, the lack of affordable child care and limited transportation options for low-income families who are struggling to stay afloat with low-paying jobs was discussed.

Homeless and Other Special Needs

Focus group participants indicated there is a need for deeply subsidized housing and that service providers need to do a better job meeting the goal of swiftly sheltering very low-income persons who are homeless or at risk of homelessness, and families with multiple, cascading issues. The supply of deeply subsidized affordable housing should be increased. The collapse of the economy has also resulted in fewer job opportunities for homeless persons. Since the writing of the last Consolidated Plan, the Welcome Arnold shelter in Cranston has closed, a loss of over 100 shelter beds that has put additional pressure on the remaining shelters serving Providence's homeless residents.

The foreclosure crisis has also put pressure on existing homeless shelters as owners and tenants are evicted. This has led to people squatting in unsafe structures and to the tent cities first seen in Providence in 2009. The tent cities are a demonstration of real need for more shelter options. It is anticipated that the tent cities will appear again in summer 2010. There needs to be an alternative to shelters for homeless who for whatever reason do not feel comfortable or safe in them.

Other special needs indicated by focus group participants included the frail elderly. There is a need for subsidized assisted living facilities that do not charge more than 30 percent of the resident's income. This need will continue to increase as Providence's population ages. Additionally, for people with substance abuse issues there is a need for youth treatment as users are younger. Focus group participants indicated that the "Housing First" model where substance abusers are treated at home versus a treatment center, is quite effective. Focus group attendees felt that the Housing First model could help those with special needs who don't have a job for a reason (i.e. substance abuse or mental illness). Housing first is different from the Road Home Model for families who typically have more skills.

Participants also felt there was a need for more supportive services for the special needs population. Services needed include: drug treatment, counseling and case management, basic habilitation not rehabilitation skills (basic life skills for those who never learned them). There are parts of the special

needs population that need to be taught these skills in order to successfully stay in housing. Also, participants saw a need for family-building skills.

McCauley Village was cited as a good model for transitional housing with supportive services. Single mothers and their children can stay at McCauley Village for 18 to 24 months learning life skills and how to stay in housing. McCauley Village residents also receive supportive services while on waiting lists for permanent housing to help them remain in permanent housing after completing the program at McCauley Village.

HOPWA

Persons with AIDS and HIV face different impediments to housing. Discrimination against persons living with AIDS (PLWA) remains the largest barrier to housing. There are no programs or public policies working to eliminate AIDS housing discrimination. Discrimination against homosexuals also impedes PLWAs from finding suitable housing. Also, when AIDS Housing providers enter the zoning process for siting housing, many neighborhoods present opposition to PLWAs in their neighborhoods. The population of PLWAs in Rhode Island is approximately 2,926 and the number of persons living with HIV in Rhode Island is between 3,700 and 4,200. In Bristol County, MA (covered by the Providence HOPWA Entitlement Area) there are approximately 1,087 people living with AIDS or HIV. PLWAs also have to deal with the perception that HIV and AIDS are no longer an issue. At any given time, AIDS Care Ocean State has over 75 people on its waiting list for housing. The lack of Section 8 vouchers hampers efforts to house PLWAs. Increases in funding for housing are needed in all areas, especially assisted living and scattered site housing. There is also a need for partnerships with mainstream service providers. Housing for PLWAs who become ill is needed as well (fragile family units). PLWAs need good quality, solid affordable housing, with secured tenure and supportive services.

Social Services

Focus group participants spoke about the wide range of agencies providing social services to residents of Providence. However, they also spoke about the difficulty in finding out what programs and services the variety of social services agencies and community centers provide. Attendees suggested a clearinghouse of some sort, or a booklet produced by the City, detailing the services provided by each agency serving city residents. Focus group attendees indicated that it is sometimes difficult to know who to call when trying to find services for residents in need. Additionally, participants felt that all agencies should have bi-lingual staff or interpreters on call to help residents whose first language is not English. Attendees indicated that there needs to be better communication between social service providers, especially the community centers, so that people know what each agency or community center is offering for residents in need.

Providers of services for seniors indicated that the RIDE program needs more flexibility. The requirement of making appointments two weeks in advance does not accommodate seniors who have an appointment and then need to have a follow-up appointment within two weeks. They also spoke of the problem of RIDE leaving seniors waiting for long periods of time after appointments.

Providers of services for youth and families indicated that improvement in the school system is a key concern. Mentoring programs and additional after school programs are needed. Also, the need for parenting classes for those parents whose skills need improvement was discussed. Also discussed was the problem of parents who would like to be involved but don't know how to do so. The need for subsidized child care so that parents can afford to pay for child care and work was also discussed. The

programs run by PASA, the Providence After School Alliance, were briefly mentioned as assets but their limited reach was also discussed..

State cuts in the Family Independence Program (FIP) were decried, as the cuts lead to children suffering and it makes it more difficult for low-income, single-parent families to survive in Providence. Additionally, the Rhode Island law requiring immigrants to reside in the state for five years before they can receive services has led to problems for many families in Providence who are struggling to survive.

Focus group attendees felt that transportation is a major barrier to receiving social services in Providence. The buses do not always run frequently on routes that take residents to social service providers. Also, RIPTA is expensive for very low-income residents and several programs that provided bus passes to low-income residents have been cut since the last consolidated plan was written. At the same time, attendees did acknowledge that RITPA is doing the best it can and that it plays an essential role in providing access to social services.

Public Sector Impediments

Regulatory Barriers

The length of the permitting process in the City was mentioned as an impediment to fair housing. It can take over six months for a housing developer such as a CDC to receive a building permit for a project. This lag time can impact a CDCs ability to move projects forward.

The inspection process in Providence was also cited as a regulatory barrier to fair housing. The inspection process was described as being arbitrary and capricious at times. It was suggested that the inspection process must take the rehabilitation of existing housing versus new construction into account when inspections are conducted. CDCs have been cited in the past for violations such as the width of stairwells and the height of basement ceilings for buildings constructed before the building codes were in effect.

Zoning

The Providence Zoning Ordinance was reviewed to determine whether it limits the development of affordable housing, acts as an impediment to fair housing choice, or limits the development of affordable housing due to increased construction costs. The lack of an official inclusionary zoning ordinance was noted, but the City does have a Comprehensive Permit Policy which allows affordable housing developers to have zoning relief granted by the City Plan Commission for certain affordable housing developments.

Site Selection

Low and moderate income housing is located in many neighborhoods throughout Providence. According to DPD data in 2009, almost every Providence neighborhood contained subsidized housing. This indicates that Providence has subsidized affordable housing units in diverse locations, expect for the most expensive neighborhoods in the city, which are largely made up of single-family, owner-occupied dwellings. Although most of the neighborhoods in Providence have subsidized and low to moderate-income housing, the south side of the city (encompassing the neighborhoods of Upper South Providence, Lower South Providence, Washington Park, and Elmwood) has more subsidized and low-to moderate-income housing than the rest of the City.

holders from other jurisdictions in getting public housing in Providence. At the briefing in the beginning of the public housing procedure, up-to-date information is given to the voucher and certificate holders.

The PHA does assist disabled certificate and voucher holders in finding assisted living public housing. The Providence PHA assists all certificate and vouchers holders. The PHA strongly emphasizes to voucher and certificate holders that they can live in any neighborhood in the City, provided there is an open unit. On occasion, the Housing Authority provides transportation services to those seeking to live in non-traditional neighborhoods, and provides information services on the rights of public housing tenants. The Housing Authority distributes tenant surveys and performs self-evaluations to maintain its commitment of service. Mobility-impaired tenants are handled on a case-by-case basis, and extensions of service are granted to tenants who require it. For persons with mental or other non-physical disabilities, those who can live independently are accepted into the public housing system. The PHA does complete Section 504 assessment of the needs of disabled members, and uses the assessment findings to create plans for meeting those needs. The PHA has completed its self-evaluation consistent with the requirements in Section 504 of the Rehabilitation Act of 1973.

Sale of Subsidized Housing and Possible Displacement

Rhode Island, as yet, has not had a pre-payment problem. Subsidized housing is under the jurisdiction of Rhode Island Housing. That agency monitors the possibility of sale of subsidized developments, and has developed a program for its own mortgages. During the writing of the 2005-2010 Consolidated Plan, Rhode Island Housing indicated that the subsidy contract for Colony House, a 101-unit elderly housing complex, was set to expire by 2007. Rhode Island Housing and the property owners were able negotiate an extension to this contract and it is now not set to expire until 2015.

Property Tax Policies

The Office of the Tax Assessor in Providence reports that there are two programs specifically targeting low-income households in the City. There is an Infirmity/Poverty Program, whereby those judged by the assessor as unable to pay because of infirmity or poverty can have their tax burdens reduced (per RIGL 44-3-3(16). The second program is a Tax Freeze Program. If a household makes $25,000 or less gross annual income it is eligible for the program. Under the program, taxes are frozen at 5.5% from the time of filing. This program is an effective policy for easing the property tax burden of the lowest income households in Providence. This information is printed on the back of each tax bill. However, for households making more than $25,000 annual income, there are no targeted tax policies. A more diverse set of property tax policies targeted at helping to ease financial constraints of all low-income households could improve access to housing for this segment of the population.

The State has enacted the Rhode Island Property Tax Relief Program to help the tax burden of low- and moderate-income households. Households with a total income under $30,000 may be eligible for a credit or refund of up to $250 from the Property Tax Relief Program. Seniors over 65, non-disabled seniors, and non-disabled persons who meet program criteria may apply for the property tax relief program. This program helps to alleviate financial constraints of low- and moderate-income residents in Providence and throughout the rest of the State. Providence, as allowed under state law, limits property taxes on affordable units to 8% of the gross income received from the unit.

Planning and Zoning Boards

A survey was conducted to ascertain the gender, race, age, and disability status of the Planning Commission and the Zoning Board in Providence. The survey was conducted to identify whether or not protected classes of people are represented on Boards that make decisions directly affecting affordable housing in the City. (This, however, does not presume that only protected classes can assure fair housing

practices.) The racial makeup of the Planning Commission and the racial make-up of the Zoning Board of Review do not approximate the racial make-up of the City, according to the 2000 Census. The most common age of the two group's members is predominantly in the 30-65 year old category. The Planning Commission is 100% 30-65 years old and the Zoning Board is 100% 30- 65 years old. Women are underrepresented on both boards in Providence, both the Zoning Board and the CPC are 71 percent male. There are no board members with disabilities.

Private Sector

Lending Policies and Practices

It is evident from the fallout of the foreclosure crisis in Providence that lenders were engaged in abusive lending practices toward low-income persons and financially less sophisticated persons. Through the collapse of the housing market and the foreclosure crisis, lending practices and policies have been significantly improved. It would appear that, moving forward, it will be far more difficult for unscrupulous lenders and brokers to take advantage of low-income and less financially sophisticated persons simply through the new more restrictive lending requirements of most banks.

Property Insurance

In Rhode Island, mortgage lenders require home purchasers who obtain a mortgage to obtain property insurance. As documented during the focus group and interview process, Providence has higher insurance rates due to its density and population. Property and liability insurance for homeowners and/or renters is not always available. There can be many reasons for this, including excessive risk assessments. Also raised during the interview process was a change in Rhode Island law, which now allows insurance companies to use an individual's credit score as a determinant in offering insurance. If turned down by private insurance companies, individuals in Rhode Island can apply for insurance from the FAIR Plan. The FAIR Plan is a pool of resources used to give insurance to low- and moderate-income residents. Although this meets the need of insurance accessibility, FAIR Plan premiums are generally set in the top quarter of prices, set by the premiums the state's largest insurance providers charge. This may result in rates being so high that securing insurance is not possible for many low-income residents. The cost of insurance may limit access and choice of housing for low-income buyers and influence neighborhood development.

The presence, or lack of knowledge about the presence, of lead-based paint hazards in a home, can also influence a homebuyer's ability to obtain property insurance. Many insurance companies do not wish to take on the liability that comes with underwriting an insurance policy on a home that contains lead, which can also force homebuyers to participate in the FAIR Plan. It is recommended that testing in both the mortgage lending and insurance industries for discriminatory policies and practices be conducted in Providence. Second tier lenders and insurance companies in the City do not come under any enforcement body with respect to discriminatory lending and "redlining" insurance rates in low- and moderate-income areas.

Public and Private Sector

Fair Housing Enforcement

The Providence Human Relations Commission has had an increase in staff since the writing of the 2005 Consolidated Plan and actively investigates fair housing complaints.

Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

The Providence Public Housing Authority maintains the Section 8 Certificate and Voucher system. This system is effective in getting assisted housing for all voucher and certificate holders. There are many CDCs operating in Providence neighborhoods. CDCs are non-profit organizations that offer everything from homebuilding and rehabilitation of structures to cultural services. CDCs work very closely with community members to align resident community vision with issues such as economic development, affordable housing initiatives, and neighborhood redevelopment. Many CDCs offer basic educational courses, new landlord certification courses, and job training services such as the Welfare-to-Work and WIA programs to aid residents in finding higher paying, skilled jobs and affordable housing.

Over the last five years, the City has made an effort to alleviate the pressure its low- and moderate-income households face in trying to gain affordable housing, raise a family, work, and feed themselves all on sometimes severely limited budgets by supporting the creation of new affordable rental and homeownership opportunities. Overall, the City has been operating relatively well with respect to fair housing.

Conclusions

1. The collapse of the housing market, the economic crisis and the foreclosure crisis have had an unforeseen result of reducing the amount of predatory lending occurring in Providence as lending standards have been tightened and banks and brokers are no longer able to write loans that people cannot afford. Conversely, the foreclosure and lending crisis has made it more difficult for everyone, especially low- and moderate-income people and families to obtain mortgages for homes in Providence.

2. Language and/or cultural barriers were cited as impediments to Fair Housing in Providence. Persons are often taken advantage of by landlords, in jobs, and when renting or purchasing a house.

3. Rental and Sales: A study has recently been completed detailing the racial and ethnic connection between predatory mortgages and sub-prime lending. Its results bear out what Consolidated Plan participants indicated: that it can be very difficult for minorities to rent or purchase housing in the areas of their choice in the city, and that they historically were steered towards more expensive, riskier loan products.

4. Property insurance is typically required by the lender before issuance of a mortgage to purchase a house. Neighborhoods in Providence with concentrations of low-income people have higher insurance rates, and property and liability insurance for homeowners or renters is not always available. The FAIR Plan is accessible to all, but Plan premiums are generally set in the top quarter of prices for available premiums, making it difficult for low income persons to afford the necessary insurance.

5. Lead-based Paint: Lead-based paint abatement programs need continued funding and additional qualified contractors need to be identified or trained. The cost of lead paint abatement is high, and new funding sources need to be identified to expand the programs.

6. The lack of quality affordable housing (both rental and homeownership) is frequently cited as a major impediment to fair housing.

7. Low- to moderate-income housing is located in many neighborhoods throughout Providence; however, the south side of the city has more subsidized and low- to moderate-income housing per neighborhood than the rest of the City.

8. RIPTA continues to work to create linkages between employment and residential areas. The efforts of RIPTA to accommodate the needs of its riders continue to be a positive change in Providence. The ability of low- and moderate-income residents to use public transportation to get and maintain employment increases their ability to obtain quality rental housing and possibly own a home in the future.

Recommendations

1. The issues addressed in this analysis cannot be dealt with on a localized basis. The Analysis of Impediments process should be expanded to either a metropolitan area-wide scale or, due to Rhode Island's small size, a statewide scale. The process must be a collaborative effort between cities and towns to identify and eliminate barriers to fair housing.

2. Discrimination in mortgage lending, housing purchase, and insurance. Conduct a testing program on a metropolitan or statewide basis in the following areas: mortgage lending practices, rental housing industry, home sales, and insurance availability.

3. Insurance: Explore methods of creating fairness in insurance costs for properties in low-income areas. Work to eliminate credit scores as a basis for offering insurance.

4. Lead-based Paint: The City should continue to respond with increased education and funding to help homeowners and landlords to remove lead-based paint from their structures as mandated by the state lead law. The City will continue to help property owners remediate their homes with HUD-funded lead grants.

5. Increase the availability of good quality rental and home ownership opportunities by continuing to work with and fund CDCs that are actively producing housing.

6. Zoning and Regulatory Barriers: The City should work to eliminate the regulatory barriers posed by the permitting and inspection processes in the City.

7. Increased connections between housing and transit: work with RIPTA to site transit service near low- to moderate-income housing and near job centers to help create the essential housing/transit/jobs linkage.

Exhibit VI-1: Low-Income Households with Housing Problems, City of Providence, 2000

	Less than 30% MFI	30% to 50% of MFI	50% to 80% of MFI	Total Low-Income Households	Percent of Total Low-Income Households
Total Households	**20,027**	**10,065**	**11,900**	**41,992**	**100**
With any housing problems	14,620	6,230	4,153	25.003	59.5
Cost Burdened	13,959	5,284	3,189	22,432	53
Severely Cost Burdened	10,294	1,439	643	12,376	29

Note: HUD defines any housing problem as being cost burdened, living in overcrowded conditions, and/or living in units without complete kitchen and plumbing facilities.
Source: 2000 CHAS DATA

Low-Income Renters

CHAS data also provided information on the housing needs of low-income renters by household type. Exhibit VI-2 presents the housing needs data for low-income renters in Providence in 2000. The incidence of need-i.e., the proportion of households with housing problems and who are cost burdened is shown in the following exhibit.

Exhibit VI-2: Low-Income Renter Households with Housing Problems, City of Providence, 2000

	Less than 30% MFI	30% to 50% of MFI	50% to 80% of MFI	Total Low-Income Renter Households	Percent of Total Low-Income Renter Households
Total Renter Households	**17,372**	**7,742**	**7,424**	**32,538**	**100**
With any housing problems	12,369	4,660	1,856	19,455	60
Cost Burdened	11,691	3,809	1,091	16,591	51
Severely Cost Burdened	8,408	735	148	9,291	28.5

Note: HUD defines any housing problem as being cost burdened, living in overcrowded conditions, and/or living in units without complete kitchen and plumbing facilities.
Source: 2000 CHAS DATA

For low-income renters, the greatest housing challenge is finding affordable, permanent rental housing of quality. This can be difficult. Currently there are 1,522 persons or families on the wait list for Section 8 and public housing in Providence, and there are 4,652 people on a pre-wait list.

Low-Income Owners

Exhibit VI-3 presents the CHAS data for low-income owners in Providence. Compared to renters, there are fewer owners earning 30 percent of the MFI that have housing needs in Providence, although the incidence rate is higher for owners. Owners earning between 31 and 50 percent of the MFI had a slightly higher incidence of needs in Providence than did renters. While there are fewer owners than renters earning between 51 and 80 percent of MFI in Providence, the incidence of housing problems for owners was higher.

Total Sheltered Population

Estimating the total population of persons experiencing homelessness on a nationwide, statewide or even local level is challenging due to the various types of homelessness and difficulties in locating the population. For example, an individual living with friends on a temporary basis could be experiencing homelessness, but would be unlikely to be identified in a homeless count. Providence uses the Rhode Island Emergency Shelter Information Project to measure the City's homeless population, as well as to identify the needs of persons experiencing homelessness.

In looking at the homeless population which receives emergency shelter, it should be noted that the statistics included in this section are reported based on the number of shelter clients in Rhode Island who reported that their last residence was in Providence. This is in contrast to statistics for the clients of shelters that are located in Providence. The City is aware that there are ties and responsibilities to both its former residents and to people who have sought shelter here. In both cases there are some complications in reporting since some people are turned away when shelters are at capacity.

6,437 people sought shelter in Rhode Island during the 2007-2008 fiscal year, a five percent decline in the sheltered population from the prior fiscal year. 2,109 people listed Providence as their last place of residence, as compared to the 2,538 people who listed Providence as their last place of residence in the 2006-2007 fiscal year, a decrease of almost 17 percent. Information for the 2008-2009 fiscal year is not yet available, but it is possible that there may have been an increase in the numbers people seeking emergency shelter due to the housing market conditions. The foreclosure crisis led to evictions of homeowners and tenants, and these residents began to appear in the shelter system during the 2007-2008 fiscal year. With the continuation of the foreclosure crisis, there will likely be more residents seeking emergency shelter.

Shelters

Homeless shelters can include emergency overnight housing and longer-term transitional housing. Exhibits VI-4, VI-5 and VI-6 list the major shelters, transitional housing providers and permanent supportive housing providers in Providence which provide services to the homeless along with the number of people they can serve at one time. The total capacity of emergency shelters in Providence, including year-round and overflow beds, is estimated to be 326. The total capacity of transitional housing is estimated to be between 200 and 250. The number of permanent supportive housing units for the formerly homeless is estimated to be around 300 units.

Exhibit VI-4: Providence Emergency Shelters and Estimated Capacity, 2010

Emergency Shelters	Total Beds/Emergency Family Housing Units	Population Served
Amos House	15	Individuals
Crossroads RI	76	Individuals and families
Interim House-Procap	24	Individuals
Providence Rescue Mission	90	Individuals
Sojourner House	11	Domestic Violence Victims
Urban League Shelter	48	Men
Urban League Family Shelter	22	Families
Women's Center of RI	40 + cribs	Domestic Violence Victims

Source: Providence Emergency Shelters

Exhibit VI-5: Providence Transitional Housing Providers and Estimated Capacity, 2010

Transitional Housing	Total Units/ Beds of Transitional Housing	Population Served
Amos House	43	Individuals
Crossroads	20	Families
McCauley Village	23	Families
Nickerson House	Numbers and information on population served not	
People to End Homelessness	6	Individuals
The Providence Center	18	Individuals
The Providence Center	52	Families
Providence Rescue Mission	90-100	Individuals
The Rainbow House	18	Individuals
The Tanner House	10	Individuals
The Turning	14	Individuals

Source: Providence Transitional Housing Providers

Exhibit VI-6: Providence Permanent Supportive Housing Providers and Estimated Capacity, 2010

Permanent Supportive Housing	Total Units	Population Served
Advent House	18	Families
Amos House	35	Individuals
Amos House	22	Families
Crossroads RI	176	Individuals
Crossroads RI	21	Families
The Providence Center	28	Individuals

Source: Providence Permanent Supportive Housing Providers

Emergency shelters are those facilities designed to temporarily house homeless persons and families who have recently become homeless. They often offer food, case management; training and employment services to help these persons and families live on their own as soon as possible. Emergency shelters are not meant to become permanent residences of homeless people and families and many cap stays at 90 days.

Transitional housing programs offer temporary but longer-term housing for homeless persons and families in order to help them transition into employment and economic self-sufficiency. These programs typically offer housing and supportive services for several months up to two years.

Permanent supportive housing provides permanent housing with supportive services for the chronically homeless who are otherwise unable to transition to employment and economic self-sufficiency.

At risk of homelessness

In addition to those who have experienced homelessness in the past, there are individuals and families who are at risk of future homelessness. Providence defines individuals and families living in substandard housing or those with a cost burden of more than 50 percent of their income, as at risk of becoming homeless. An unexpected hardship such as the loss of a job, an illness or a housing condition issue can quickly force these individuals and families into homelessness.

do not get the help they need with high school completion, employment, accessing health care, continued educational opportunities, housing and transitional living arrangements, which can lead to longer-term housing and supportive service needs. There is no accurate number of youth who age out of the foster care system in Providence each year, but it is estimated to be between 50 and 150 youth per year.

Youth with uncertain futures

Rhode Island Kids Count defines youth not in school and not working as teens aged 16 to 19 who are not enrolled in school, not in the armed forces and not employed. Recent high school graduates who do not have jobs and high school graduates are also included in the RI Kids Count definition. According to the 2009 RI Kids Count data book 10 percent of Providence teens are not in school, the armed forces or employed. This statistic captures a population of youth and young adults that may be having difficulty making the transition to adulthood.

Youth who are homeless or at risk of homelessness

Homeless youth are defined as 13 to 17 year olds who received emergency housing services at emergency homeless shelters and domestic violence shelters. The 2009 RIKidsCount Data book estimates that there were 80 to 85 homeless youth in Providence in 2009 (this is in addition to the estimated 556 children and youth who accessed emergency shelter services with their families). There were an additional 15 youth aged 18-20 and 39 youth ages 21-24 with a last permanent residence of Providence who accessed emergency shelters in 2009 as single “adults.” Finally, the Providence School Department identified 238 children from Pre-K through grade 12 as homeless during the 2008-2009 school year per the McKinney-Vento definition of homelessness.

Youths at risk of homelessness include those who live with low-income families with precarious housing situations, those who age out of the foster care system, and those who live in households with violence or drug abuse.

Persons Re-entering the Community

Another subpopulation that has special housing needs is people who have been released from prison. At the time of probation, parole or full completion of their sentences, members of this group need to find affordable housing when they often have limited financial resources and poor histories of employment. There is no system of halfway houses for persons released from prison in Rhode Island. The provision of halfway houses and transitional housing is seen as an important element of moving this population into stable long term housing situations. Regulations barring people with criminal records from subsidized housing (both public and private) further exacerbate this problem. The lack of adequate discharge planning for people before they are released from prison compounds the problem.

The problems of people re-entering the community were mentioned at almost every focus group for the Consolidated Plan. Over 1,500 people re-enter the community from the Rhode Island Corrections System each year, the vast majority without adequate discharge planning. In some cases, people re-entering the community have been dropped off at homeless shelters by the corrections system. These people face steep challenges in finding housing as most providers of affordable housing do not allow persons with criminal records to reside in their properties. Additionally, organizations that provide services to the re-entry population often face fierce resistance from the neighborhoods in which they want to locate housing or programs.

Persons with Physical Disabilities

The 2008 ACS identified 15,048 residents of Providence between the ages of 18 and 64 who had limitations in mobility or self-care; this represents 13 percent of this age group. The housing needs of this sub-population do not generally involve supportive services; structural adaptations such as ramps and wider doorways, are often the only additional requirements for providing appropriate housing.

As during the writing of the 2005-2010 Consolidated Plan, focus group participants indicated the need for CDCs and other affordable housing providers to include handicapped accessible units in their construction and rehabilitation of housing units. The PHA currently has 130 units of designated handicapped housing with another four under construction, including over seventy wheelchair accessible units and over 20 units adapted for hearing and/or sight impaired families.

Persons with Mental Illness

Many people with mental disabilities have to deal with the problems faced by other very low-income persons in addition to the limitations created by their disability. In general, about 70 percent of people with mental illness/disability can function in the community with only the additional need for supportive services. The remaining 30 percent of this population require some degree of supervised housing. Regular in-home case management can generally accomplish two-thirds of the supervised housing demand; the needs of the remaining third are addressed through congregate housing with on-site support services.

Persons with Developmental Disabilities

The Rhode Island Department of Mental Health, Retardation and Hospitals works with a statewide population of approximately 4,000 adults with developmental disabilities, about half of whom live with their families. The Division of Developmental Disabilities (DDD) offers housing options in over 1,000 community settings for approximately 2,000 Rhode Islanders with developmental disabilities. Settings include apartments, adult foster care placements, condos, group homes with care levels ranging from 24 hour care to minimal support. Over the past two decades there has been an increase in family acceptance of their adult family members with a developmental disability living independently in the community. Additionally, the DDD reports that approximately 40 percent of the parents who have developmentally disabled adult children living at home are over the age of sixty, similar to the numbers at the writing of the 2005-2010 Consolidated Plan. The increased number of developmentally disabled living at home with their families and in community settings plays a significant role in the growing number of requests for residential support that the DDD receives on an annual basis.

Persons with Substance Abuse and Addiction Issues

The U.S. Department of Health and Human Services, through its Substance Abuse and Mental Health Services Administration (SAMHSA), tracks substance abuse prevalence at the state level. According to SAMHSA's 2007 National Household Survey on Drug Use and Health (NHSDUH), and using population data from the 2006-2008 ACS, the statewide prevalence for alcohol or illicit drug dependence or abuse in Rhode Island is 12.5 percent for persons age 12 and older. Applying this estimate to Providence's population 12 years and older, an estimated 17,635 persons would have had some form of substance abuse problem during the survey period.

The 2007 NHSDUH showed that 16 percent of Rhode Island's population ages 12 and older had used marijuana one or more times in the last twelve months, 6 percent had used nonmedical pain relievers one or more times in the past twelve months and 4 percent had used cocaine one or more times in the last

twelve months. These statewide usage rates for persons age 12 and older translate to Providence estimates of 22,560 marijuana users, 8,460 nonmedical pain reliever users and 5,460 cocaine users in Providence. The percentage of individuals addicted to these substances is probably lower than the percentage of people reporting usage.

There are several indicators that people and families with substance abuse and addiction problems experience issues with maintaining stable housing situations. The 2008 survey of persons who used emergency housing found that 15.6 percent of people reporting had experienced drug problems. Care providers in the city continue to identify a major gap in services for dual and triple diagnosed patients.

Families and Lead Based Paint Hazards

Several factors make Providence children vulnerable to lead-based paint hazards. Rhode Island has the fourth oldest housing stock in the country. According to the 2008 ACS there were 59,173 occupied housing units in Providence. It is estimated that over 65 percent of the housing in Providence, approximately 44,000 units, contain lead-based paint hazards. According to Rhode Island Kids Count 2,916 children in Providence were tested for lead paint in 2009. Of those children, 215 (7.4%) had lead levels of 10mcg/dL or greater. This is an increase over the numbers in 2005, when 6.2% of children tested in Providence had confirmed elevated lead levels in their blood.

The DPD has received multiple Lead grants over the past decade to address lead-based paint hazards in Providence housing. In January 2009, the DPD received two additional grants, one for a Lead Hazard Reduction Demonstration Program to provide services to low-income families who occupy sub-standard privately owned housing constructed prior to 1978 in certain Census Block Groups in the City. This is a companion grant to the existing Lead-Based Paint Hazard Control (LBPHC) grant program. Together these two grants ensure that all eligible families throughout Providence are afforded an opportunity to live in lead-safe, healthy, affordable homes.

The DPD also received a HUD grant to begin to implement the LBPHC Mitigation and Preservation demonstration program. This program will use interim controls and hazard abatement to mitigate 70 units of housing during the 36 month grant time frame. DPD and the City as a whole are committed to eliminating childhood lead poisoning and will use the HUD grants as well as other leveraged resources and initiatives to achieve this goal.

The Providence Water Supply Board (PWSB) is currently under a consent decree from the U. S. Environmental Protection Agency (EPA) to replace all the lead water services in Providence. PWSB has created a partial lead service replacement program and has been replacing ten to fifteen percent of the lead services in Providence each year for the past four years. The partial lead service replacement program involves replacing the lead service pipe with copper from the water main in the street to the property line. Property owners can then choose to have the remaining lead service pipe from the property line into the house replaced. The PWSB has offered loans to property owners for this portion of the lead service replacement, but the cost has exceeded what many owners have been willing or able to pay, therefore most of the service replacements in the city have been the partial replacements from the water main to the property line. Several studies have indicated that lead levels in water are higher after a partial lead service replacement, which has led to concerns about the partial lead service replacement program. The PWSB petitioned the EPA in April 2010 to stop the partial lead service replacement program while this debate is ongoing. This data is of great concern to health advocacy organizations such as the Childhood Lead Action Project and to the City. The City supports the PWSBs request to

however, is in stable condition. The PHA's high-rises that house the elderly/disabled population are in good to excellent condition.

Over the last five years, the Authority has obtained and dedicated approximately $46.0 million in capital improvement funds to improve their overall portfolio through various funding sources. The PHA receives an annual allocation of formula-based capital improvement funds from the Department of Housing and Urban Development ranging between $3.5 and $4.5 million, subject to Congressional appropriation.

The PHA has taken advantage of several HUD programs to accelerate its capital improvement projects. In FY2008, the PHA issued $9.1 million in bonds securitized with future Capital Fund Program funds. The Authority also obtained $12.0 million to execute an energy performance project to save approximately $1.2 million annually in utility costs. This project involved replacing 61 boilers, decentralizing an old, central power plant at Chad Brown, replacing old appliances with Energy Star appliances, replacing all lighting fixtures, installing water restrictors in all 2,606 units, and installing a co-generator at its oldest development, Chad Brown.

In March of 2009, the PHA was the recipient of $5.1 million in American Recovery and Reinvestment Act (ARRA) funds as an add-on to its regular Capital Fund Program funds. This distribution was based on HUD's Capital Fund Program formula. The PHA has had master plans completed for all its developments and will dedicate approximately $6.0 million to site improvements in 2009/2010.

Exhibit VI-8: Capital Funds Received

Program	Source	Amount	Use
Capital Fund Program '05	HUD	$4.1M	Building and systems improvements
Capital Fund Program '06	HUD	$3.9M	Building and systems improvements
Capital Fund Program '07	HUD	$4.1M	Building and systems improvements
Capital Fund Program '08	HUD	$3.9M	Building and systems improvements
Capital Fund Program '09	HUD	$4.1M	Buildings & site improvements
Capital Fund Financing Program '08	Bond	$9.1M	Building, site improvements, Fire alarm system upgrades, heating system improvements
Energy Performance Contract	Bond	$12.1M	Energy upgrades: new boilers, water flow constructors, new lighting and appliances
ARRA	HUD	$5.1M	Elevators modernization, site improvements, security cameras, scattered site housing improvements
TOTAL		**$46.6M**	

NOTE: Portions of the annual CFP funds are dedicated to operations and bond principal and interest payments. Approximately 60% of the funds are available for "hard cost" improvements.

Waiting List Assessment

The PHA maintains separate waiting lists for public housing and Section 8 assistance. As of December 31, 2009, there were 1,079 families or individuals on the public housing waiting list and 443 on the Section 8 waiting list. The public housing waiting list has remained open for new pre-applications since October 2000. Placing a family on the actual waiting list involves significant data collection and record maintenance that must occur every three months. Therefore, families are initially placed on a pre-application list. Families are then moved to the formal waiting list as space is made available. At that time the comprehensive data collection process begins and all the information must then be kept up to date in anticipation of leasing.

The Section 8 formal waiting list currently has 443 individuals and families waiting for assistance. An additional 1,400 families are on the Section 8 pre-application wait list. Every month a portion of the pre-application list is processed to place them on the regular Section 8 waiting list.

The formal public housing waiting list consists of 1,079 families or individuals with 3,252 more on the pre-application wait list. Affordable housing is scarce and once families or individuals are housed, some stay in public housing for longer periods of time. This decreases the number of vacant units, thus increasing the average wait for new applicants. The average wait time for families applying for family developments can be as long as 5 years, while those applying for elderly or disabled high-rises wait a period of six months to 2 years depending upon the unit size required.

Exhibit VI-9: Public Housing & Section 8 Waiting Lists & Pre-application List

	Public	Section 8
December 31, 2009	1,079	443
Pre-application	3,252	1,400
TOTAL	**4,331**	**1,843**

Waiting List by Family Income

The vast majority of families on the PHA and Section 8 waiting lists have incomes below 30% of the area's family median income (MFI). Only 1% of the public housing and 25% of the Section 8 have incomes from 30%-50% of MFI. Less than 1% of public housing families on the waiting list have incomes greater than 50% of MFI. No Section 8 families on the wait list have incomes greater than 50% MFI.

Exhibit VI-10: Income of Waiting List Applicants/Public Housing & Section 8

Income Range	Public Housing		Section 8	
MFI	**# of Families**	**Percent**	**# of Families**	**Percent**
0%-30%	1,076	100%	332	75%
30%-50%	2	<1%	111	25%
50%-80%	1	<1%	0	0
TOTAL	**1,079**	**100%**	**443**	**100%**

Waiting List by Race

The majority of both the public housing and Section 8 waiting lists are composed of Hispanics (62% of public housing and 84% of the Section 8 waiting list). Data for Hispanic families are counted as ethnicity and not as race. Therefore, the Hispanic applicants fall almost entirely into the White or the African American racial categories. This factor accounts for the large percentage of Whites on the waiting list (73.5% on public housing and 93% on Section 8).

African American applicants make up the second largest race category with 23% of the public housing waiting list and 6% of the Section 8 waiting lists, while Native Americans, Asians and "Other" account for less than 4% of both waiting lists.

Exhibit VI-11: Racial Composition of Waiting Lists/Public Housing & Section 8

Ethnicity	Public Housing		Section 8	
	Number	Percent	Number	Percent
Hispanic	688	62%	373	84%
Non-Hispanic	419	38%	70	16%
Race	Number	Percent	Number	Percent
African-Americans	252	23%	25	6%
White	814	73.5%	412	93%
Native American	25	2%	5	1%
Asian	15	1%	0	0
Other	1	0.5%	1	<1%
TOTAL	**1,107**	**100%**	**443**	**100%**

Waiting List by Bedroom Need

The greatest need of applicants on the public housing waiting list is for 0-bedroom efficiencies. This marks a change from the 2000 Consolidated Plan when the greatest need was for 2-bedroom apartments. Prior to that time, the greatest need had been for 3-bedroom and larger units. Since 1989 the PHA constructed 252 units of scattered site housing all with 3-4 bedrooms per unit. Eight of these have been sold to former residents who bought the houses through the PHA's Homeownership Program.

For the Section 8 waiting list the greatest need is for 2 or 3 bedroom units. These two unit sizes account for 77% of the waiting list while there were no requests for efficiencies.

Exhibit VI-12: Needs of Waiting List Bedroom Size/Public Housing and Section 8

Bedroom Size	Public Housing		Section 8	
	Number	Percent	Number	Percent
0 Bedroom	320	29%	0	0%
1 Bedroom	173	15%	68	15%
2 Bedroom	299	27%	169	38%
3 Bedroom	197	18%	174	39%
4 Bedroom	87	8%	20	5%
5 Bedroom +	31	3%	12	3%
TOTAL	**1,107**	**100%**	**443**	**100%**

Needs of Handicap Applicants

Currently there are 22 families on the public housing waiting list who require a handicapped accessible unit. Five of these families require a wheelchair accessible unit, five require a unit modified for hearing impaired residents and one requires a unit modified for sight impairment.

The PHA has 130 units of designated handicapped housing including four units currently being converted using formula-based ARRA funds. Additionally, the PHA has adopted a policy to market these handicap accessible units to local groups that serve the handicap and disabled populations. The conversion of units to handicap-accessible units involves lowering counters and appliances, adding ramps, making wider doorways, new bathroom appliances and fixtures, and more.

Needs of Elderly

The waiting list for elderly housing is fairly short. Most of the individuals on the PHA's waiting list for efficiency and one-bedroom units (the majority of our elderly and elderly/disabled developments) are for younger, disabled residents, most experiencing mental disabilities.

VII. Community Development Needs Assessment

Community Development Needs

Neighborhood Investment Strategies

Rather than piecemeal the revitalization and rehabilitation of neighborhoods in the City, the City has created a policy of working on Neighborhood Investment Strategies (NIS). The idea of the NIS is that it is impossible to have real success with neighborhood revitalization without addressing the area as a whole. The main pieces of the NIS are physical improvements and public investment in an area.

The most effective method of revitalization is physical improvements to a neighborhood or area. Physical improvements were characterized as "bricks and mortar" and "very visible" efforts that show neighborhood residents the City is spending money to create change. Public investment stimulates private investment. When private owners see that the City is spending its funds to improve an area, then they too make investments in their own property to complement the public improvements. These two forces can combine to create a holistic neighborhood or area revitalization plan. Private investment brings jobs, new facilities, economic revitalization, and infrastructure improvements to neighborhoods. The City's Neighborhood Investment Strategies include the following components.

Neighborhood Revitalization and Economic Development

Neighborhood revitalization is a central component of all of the City's community development efforts. The neighborhood revitalization and economic development focus group, attended by neighborhood residents and representatives of community organizations, was held to discuss neighborhood revitalization and economic development issues in Providence. The most effective techniques for revitalization were identified by the focus group. These techniques and methods identify the needs in the community as a whole and for specific areas and neighborhoods. They will also serve as a guide for future revitalization efforts.

The focus group also addressed changes in job creation and retention, stabilization and expansion of small businesses, and neighborhood job opportunities over the last five years. The decline in the national economy has severely impacted the local economy. There are not many jobs available at any skill level in the current job market and low-skilled workers are competing with skilled workers for jobs leading to further disadvantages for low skilled workers.

• Job training programs

The focus group discussed major needs and gaps that need to be incorporated into the job training programs. Organizations which provide funding to job training programs often have unrealistic timetables for the program to provide persons with enough skills to find and keep a job. The majority of the training programs are for women. It is sometimes difficult to find programs for men. In addition, many persons have difficulty navigating through the system without assistance and realizing the full benefits that can be derived and are available. Undocumented immigrants and those not registered in the draft are not addressed by the system and are ineligible for any training programs.

The focus group participants noted that the lack of basic skills is a major gap for the training programs and ultimately for persons to reach full employment. These basic skills include personal grooming and oftentimes language is also a barrier due to persons' diversity and culture. In addition many persons do not have clothes for interviews and/or work.

In addition, literacy and education are two major gaps that prohibit persons from participating in these training programs. For persons who are speakers of English as second language and native speakers of English, the functional literacy level can be so low that it prevents participation in job training programs. The standards for the education requirements of many of the existing training programs are too high. If a training program or a job requires a GED, it eliminates 75% of the low-skills job pool in Rhode Island.

Available and affordable childcare was also noted as a major need. Many times, parents have difficulty finding childcare, particularly for parents who work the second and third shifts. In addition, there are no sick-child facilities for parents who either work or are participating training programs.

Another issue raised during the focus group process was the difficulty undocumented immigrants have in accessing job training programs. These undocumented workers cannot access the job training programs that they would otherwise qualify for.

• Public involvement

Public involvement also identified as an essential part of neighborhood revitalization. It is essential to create "pride of place" in order to help to revitalize a neighborhood. Public involvement also acts as an educating tool. If residents play an active role in the revitalization of their neighborhood, they can help to maintain its character and defend proposed developments with intimate knowledge of the process. Providence Tomorrow, the recent neighborhood planning process used charrettes to create holistic neighborhood plans for each neighborhood in Providence. Over 3,000 Providence residents participated in the Providence Tomorrow neighborhood planning process. These neighborhood plans address revitalization needs for each neighborhood such as streetscape improvements, infrastructure improvements, housing revitalization and stabilization, etc.

• Adequate, Affordable housing

Adequate affordable housing is an essential element for successful revitalization of any neighborhood. It is essential to utilize a mix of both new construction and rehabilitation. New construction can occur on vacant lots or where blighting influences are beyond repair and need to be removed. New construction should complement the character of a neighborhood. Rehabilitation of existing structures helps to preserve the historic character of a neighborhood and the adjacent area. The rehabilitation of older buildings also enhances the character of a neighborhood and creates pride in its owners and residents. The foreclosure crisis has left many houses in Providence vacant and in dilapidated conditions. Many CDCs are looking to acquire these houses to rehabilitate as affordable housing and to help prevent the cycle of investors flipping properties, which helped lead to the foreclosure crisis in the first place.

• Open space

Open space and organized green space (i.e. parks and community gardens) are very effective component of neighborhood revitalization. Most of Providence was developed when motor vehicles were few and far between and residents depended on the trolley or foot for transportation. Providence is a built out community, open space is only created by demolition. Occasionally when demolition occurs the lots may be sold to abutting land owners for increased yard areas and off-street parking. In the past larger vacant lots have been converted to green space such as parks and playgrounds. These areas provide a public gathering place for neighborhood residents.

Residents of the South Side and the extreme western neighborhoods of Providence (Manton, Hartford) have less open space in their neighborhoods as compared to the rest of the City. Residents expressed a desire for increased connections to existing open space in other neighborhoods and for the creation of new open space, whether it be parks or community gardens on blighted lots in their neighborhoods.

• CDCs

There are over ten CDCs in Providence; each located in general areas of the City. The Elmwood Foundation and Greater Elmwood Neighborhood Services have merged to form Community Works RI. Community Works RI continues to implement the Elmwood Neighborhood plan created with Rhode Island Housing and DPD. CDCs in other neighborhoods should use the approved neighborhood plans created through the Providence Tomorrow Neighborhood Planning process to direct their neighborhood revitalization and housing construction efforts. The CDCs should make targeted improvements in neighborhoods that will have the greatest possible, positive impact on the neighborhood as a whole.

• Historic character

Neighborhood revitalization may focus, where desired by residents, on the historic character of neighborhoods which should be enhanced and preserved whenever possible. The installation of educational plaques, signs, and curbstones indicating the historical "story" of the property, area, or structure, gives the residents, and especially the children, of a neighborhood a history in which to place themselves and their homes.

• Transportation/job connections

The Transportation/job connection was identified as a need for many low-moderate income persons and families. Most of these people have no vehicles. The public bus transportation system for City residents is radial with few cross connections available. The cost of a bus pass can also be an obstacle for many. In addition, for those persons that work the second and third shifts, bus connections are not typically available either one way or both ways. There are also childcare transportation conflicts between school and employment locations, especially among second and third shift parents. Focus group participants stated that if a person cannot get to a job, than that job may as well not exist.

• Business development and assistance

A major need that was cited was the availability of capital for economic development of small businesses. Many of these businesses have low savings and nothing to draw upon during hard times. The Minority Investment Development Corporation (MIDC) provides limited access capitol to businesses after the banks refuse them. The near collapse of the financial system has vastly restricted access to credit and capital for small businesses, and this has led to additional struggles for small business owners.

Technical assistance to businesses was another need identified by the focus group. It was stated by many participants that the education process needs to start before people receive a business loan. Many need technical assistance, both pre-loan and post-loan. Pre-loan assistance includes preparing a business plan, learning to estimate, etc. This assistance is supplied by the Business Information Center (BIC), Small Business Development Council at Bryant, and the SBA and SCORE. The lack of post-loan counseling was identified as a major need for minority and small businesses. It was also stated that the needs of small business owners can be so varied, they do not often appreciate the other skills required to run a small business.

Public Service, Youth Programs, and Senior Programs Needs

The City held a focus group addressing social service needs. Representatives from Rhode Island Housing, community centers, and a number of non-profit agencies were present. The focus group identified needs as a result of discussions related to:
1. Are social services equally available to all persons in Providence? .
2. What are the barriers to providing social services in Providence?

• Public Services Needs

There are a variety of agencies providing social services for low and moderate income persons in Providence, and these agencies are important assets in the communities that must be continued. An issue facing all social service agencies in the City is the lack of resources to meet the growing demand for services. Duplication of services, both administratively and programmatically was raised as a major issue facing the social service agencies. Service providers in the City need to consider consolidation to eliminate the duplication of services. A centralized database to track clients of social service agencies and community centers was suggested as a potential way to eliminate duplication of services within the City. Service providers also need to identify other funding sources to leverage City funds with.

The lack of communication between service providers impedes the provision of services. There should be an effort to get neighborhood centers to share information and services. The current funding system forces service providers to compete against each other when they should be working together to better serve the community. The centers need to break down their own divisions and provide services in a more comprehensive manner. The focus group identified the need to allow new programs to be incorporated into the funding mechanism. They also noted that more accountability is needed of program performance. All identified that CDBG funding is not nearly enough money to provide services, and build and renovate bricks and mortar structures at the same time.
With the three year funding cycle, there needs to be a way to fill the existing community centers with new programs. Social service providers in the City need to work together to maximize the limited resources available.

While the City is small enough to be manageable on a practical level; it is also a very diverse city with a range of needs. Social Service providers and programs need to respond to these facts and be inclusive to local residents as well as a part of a larger holistic social services policy to provide for groups that typically “fall through the cracks”.

Presently there is a large Hispanic population in the City of Providence that utilizes the available Social Service programs. However, while the Hispanic population is generally the largest population seeking services, others such as South East Asian and Eastern European are seeking services as well. Agencies which provide social services recognize the cultural differences in these communities and noted that the funding sources for these programs should recognize and reinforce these efforts.

• Family Programs

Many parents are working second and third shift jobs which leaves their children unsupervised after school. Many parents experience problems addressing childcare needs for before school and both after school and during the night. Many of the children who really need services are those who aren’t getting any support at home and whose parents don’t qualify for assistance for a variety of reasons. There needs to be a better system for reaching out to those children.

The focus group identified the need for the Community Centers to provide youths with a place to go after school and at night. The School Department needs to be involved in the Consolidated Planning process. It was suggested that more after school programs be provided extending into the early evening hours. Qualities after school programs are crucial for working families. The Providence after School Alliance (PASA) was mentioned as a successful after school program and one that should serve as a model for other programs. Participants felt that it needed more support for further expansion so it can serve a greater number of Providence's youth.

• Adult Programs

It was mentioned by several service providers that single adults without children have an extremely difficult time accessing services. There are no programs specific to this population. It is a population with vastly underserved needs. According to the Urban League, many of these single adults without children are dually diagnosed and may have criminal records which further limit the programs they may be eligible for. Programs needed for this population include literacy classes, ESL classes, and basic life skills and job training programs. Also, undocumented adults have an even more difficult time accessing services.

• Senior Programs

The Comprehensive Adult Day Center is the only adult daycare program in Providence and receives no city money. There has been an increase in the number of frail elderly in the City, even though the overall number of elderly in the City has declined. Many community centers which used to provide senior programs 4 to 5 days a week are now providing them only 1 day a week due to a drop in demand for the programs. The frail elderly often have physical limitations which prevent them from taking advantage of programs offered by community centers and other social service providers.

• Youth Services

Presently PASA is the only youth program in Providence administered on a citywide scale. In the past, Providence had more of these programs. Youth services need to cover more than sports and include the arts, theatre, education and tutoring. Programs for youths are competing with the "street life" image, which is a youth magnet. These programs need to respond to positive needs of youth in order to compete with the "street life" mentality and its draw.

Community Centers currently running successful youth programs have adequate gymnasiums for youth programs to utilize. However, many of the programs are more oriented towards boys. There are not as many programs for girls to access. There need to be adequate programs for both boys and girls and all programs need ample space. Gang affiliation among youth is rising. Community Centers need to provide safe places of refuge for youth to get out of gang life-style. Community Centers need to have staff on the streets for a longer period of time to get to know local population and inform them about Center's services.

CDBG Allocation Process

To be successful, the City CDBG allocation process must be a level playing field for all applicants. To that end, the City requires all applications to be substantially responsive to the annual Request for Proposals. Applications must detail which strategy or goal of the Consolidated Plan the applicant proposes to address. Applications need to meet one or more national objectives. Applicants must apply only for eligible activities (maintenance projects are not eligible activities.) Applicants are strongly encouraged to attend the technical assistance workshops the City holds to better understand the application process.

The City will adhere to the following schedule for the CDBG allocation process:

- The Request for Proposals will be issued in mid to late fall.
- A technical assistance workshop will be held to assistant applicants with completing the required forms.
- Applications for funding are due in late December or early January.
- CDBG staff review and rank applications. Staff and management review ensures applications meet all statutory requirements. The City reserves the right to interview applicants for further information and clarification regarding their applications.
- Public hearings in the community are held to allow applicants and concerned members of the public to comment on the program.
- The Mayor provides budget guidance to the City Council for referral to the URRP Committee by early March.
- A final public hearing is held at the beginning of the public comment period.
- Under City Ordinance 550, the URRP Committee is required to forward it's budget recommendation for an April vote by the full City Council for a May 15th submission to HUD. Per the statutes of the CDBG program, the annual report must be submitted to HUD no later than 45 days prior to the end of the submitting entities fiscal year.

Three-Year Goals

The City of Providence has established the following goals to guide the Consolidated Plan funding from 2011 to 2013.

Affordable Housing Goal 1: Create and preserve affordable rental and homeownership units throughout the City within the larger context of neighborhood revitalization.

Affordable Housing Goal 2: Expand the resources available for low- to moderate-income renters wanting to become homeowners.
Strategies:

Affordable Housing Goal 3: Provide lead abatement services to eligible low-income rental and ownership households.

Affordable Housing Goal 4: Provide support services that educate renters and promote housing rights.

Special Needs Population Goal 1: Assist special needs populations with supportive services, facilities and housing needs.

Special Needs Population Goal 2: Assist persons living with HIV/AIDS achieve and maintain a high standard of living and satisfactory health status.

Special Needs Population Goal 3: Assist persons who are homeless or who are at-risk of becoming homeless.

Special Needs Population Goal 4: Assist low-income and special needs populations with supportive services to increase self-sufficiency.

Community Development Goal 1: Develop a workforce for 21st Century jobs.

Community Development Goal 2: Help small businesses grow and prosper through financing and technical assistance to improve the economic viability of neighborhoods and promote the creation/retention of jobs.

Community Development Goal 3: Continue neighborhood revitalization efforts.

Community Development Goal 4: Work with non-profits and neighborhood organizations to build community capacity.

Actions to Address Needs

This section outlines the specific objectives that will guide achievement of the City's Consolidated Plan goals.

Affordable Housing Goals

Affordable Housing Goal 1: Create and preserve affordable rental and homeownership units throughout the City within the larger context of neighborhood revitalization.

Strategies:

A. Continue to support efforts to create and preserve affordable housing in the City.
B. Work to incorporate affordable housing through incentive zoning or other mechanisms throughout all neighborhoods in the City.
C. Continue to provide bonuses under the performance funding formula to CDCs that develop housing in neighborhoods identified as underserved by the City.
D. Continue to provide bonuses under the performance funding formula to CDCs that develop housing for persons at the lowest income levels.
E. Support CDCs efforts in development new rental and homeownership opportunities through rehabilitation of existing housing and through infill construction.
F. Develop new partnerships and resources to provide assistance to existing owner occupants.
G. Support efforts to preserve owner-occupied rental housing throughout the City.
H. Work to preserve rental units that are at risk due to expiring use restrictions.

Affordable Housing Goal 2: Expand the resources available for low- to moderate-income renters wanting to become homeowners.

Strategies:

A. Encourage homeownership by better promoting existing closing cost assistance and first-time buyer incentive programs.
B. Coordinate with CDCs to promote the first time homebuyer programs available to Providence residents.
C. Provide homeownership, financial literacy, and foreclosure prevention counseling to low-and moderate-income households.

Affordable Housing Goal 3: Provide lead abatement services to eligible low-income rental and ownership households.

Strategies:

A. Continue efforts to address lead-based paint hazards throughout the City in rental and owner-occupied housing units in housing units built before 1978.
B. Continue to apply for competitive HUD Lead grants for funding of lead abatement projects in the City.

Affordable Housing Goal 4: Provide support services that educate renters and promote housing rights.

Strategies:

A. Encourage programs that provide mediation services between landlords and low-income tenants the result in necessary health and safety repairs to rental units.
B. Support CDCs that provide direct counseling and technical assistance to low-income renters regarding tenant/landlord issues.
C. Encourage and support public education programs regarding fair housing and landlord/tenant issues.

Special Needs Population Goals

Special Needs Population Goal 1: Assist special needs populations with supportive services, facilities and housing needs.

Strategies:

A. Support the creation of additional permanent supportive housing units for persons with special needs.
B. Support the creation of transitional and permanent supportive re-entry housing units for persons re-entering the community from the correctional system.
C. Support the expansion of existing "Housing First" treatment programs for persons with substance abuse problems who need supportive housing.

Special Needs Population Goal 2: Assist persons living with HIV/AIDS achieve and maintain a high standard of living and satisfactory health status.

Strategies:

A. Support the preservation of existing permanent supportive housing and supportive services for persons living with HIV and AIDS in the Providence Entitlement area.
B. Support the creation of new permanent supportive housing units for persons living with HIV and AIDS in the Providence Entitlement area.

Special Needs Population Goal 3: Assist persons who are homeless or who are at-risk of becoming homeless.

Strategies:

A. Assist chronically homeless individuals find and maintain permanent supportive housing.
B. Assist persons at-risk of homelessness by increasing the supply of quality affordable housing.
C. Assist in the development of scattered site transitional and permanent supportive housing for homeless individuals and families
D. Support the creation of service programs that teach habilitation skills (basic life skills) such as financial literacy, banking, how to maintain housing, how to apply for a job to the homeless and those at-risk of homelessness.
E. Support the creation/expansion of programs that teach family building skills for the homeless or at-risk of homelessness.
F. Support the continued operation of emergency shelters.

Special Needs Population Goal 4: Assist low-income and special needs populations with supportive services to increase self-sufficiency.

Strategies:

A. Assist at-risk youth and their families through comprehensive services that focus on basic needs, mental health services, educational support and social enrichment.
B. Assist low-income seniors to maintain independent living through home care services and provide guardianship and elder shelter programs to prevent and protect seniors from becoming victims of abuse, neglect, or exploitation.

Community Development Goals

Community Development Goal 1: Develop a workforce for 21st Century jobs.

Strategies:

A. Ensure that neighborhood residents are aware of job opportunities and have skills to benefit from the jobs that become available through business expansion and creation.
B. Use the First Source program to connect job seekers with services; including in-person and online courses on resume writing, interview preparation, and computer and software skills. Other services could include: promotion of networking sessions and connecting job seekers with career and skill assessments
C. Continue to support the Pathways to Opportunity program.

Community Development Goal 2: Help small businesses grow and prosper through financing and technical assistance to improve the economic viability of neighborhoods and promote the creation/retention of jobs.

Strategies:

A. Continue PEDP loans to businesses.
B. Support programs to foster business stability through the micro-loan program.
C. Identify potentially related neighborhood businesses and help them connect to each other and to larger regional businesses.
D. Continue the Neighborhood Markets program.

Community Development Goal 3: Continue neighborhood revitalization efforts.

Strategies:

A. Support the rehabilitation of small neighborhood commercial areas through the Neighborhood Markets program.
B. Continue neighborhood stabilization efforts through rehabilitation loans and grants.
C. Support the implementation of the Providence Tomorrow neighborhood plans.
D. Support the implementation of GreenPrint.
E. Continue to promote intermodal transportation efforts throughout the City.

Community Development Goal 4: Work with non-profits and neighborhood organizations to build community capacity.

Strategies:

A. Support public service providers in their efforts to find new and untapped funding sources.
B. Encourage collaboration and strategic planning between agencies to eliminate service overlaps and duplication of administration costs.
C. Use the Family Service Center model to expand services to working families.

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HUD Needs Tables

The follow tables are the HUD Needs Tables showing the needs for housing and community development for the 2011-2013 Consolidated Plan.

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Optional Continuum of Care Homeless Housing Activity Chart Instructions
Column Name
Provider Name: Self-explanatory.
Facility Name: Self-explanatory.
HMIS: Enter one of the following three codes for each project concerning its participation in the Continuum of Care's HMIS.
C=Currently entering client data into the HMIS; P-Month/year (P-4/04) = Planned month/year that the program will begin entering client data into the HMIS; and N=the program currently does not plan to participate in the HMIS.
Geo Code: Indicate the Geographic Area Code (Geo Code) for the project. Where there is only one geographic code for the Continuum, check the box and indicate that code in the first project only. If the project is located in multiple jurisdictions, select the jurisdiction where the majority of the provider's inventory is located.
Target Population A: Select the code that best represents your project: **SM**= only Single Males (18 years and older); **SF**= only Single Females (18 years and older); **SMF**= only Single Males and Females (18 years and older with no children); **FC**= only Families with Children; **YM**= only unaccompanied Young Males (under 18 years); **YF**= only unaccompanied Young Females (under 18 years); **YMF**= only unaccompanied Young Males and Females (under 18 years); **M**= mixed populations. Only one code should be used per facility. If more than one group is served use the **M**=mixed populations code

Target Population B: Indicate whether the project serves these additional characteristics: **DV**= only Domestic Violence victims; **VET**= only Veterans, and **AIDS**= only persons with HIV/AIDS.
2004 Year-Round Units/Beds:
Family Units: Enter the number of units that the project set-aside for serving families.
Family Beds: Enter the number of beds that are contained in family units.
Individual Beds: Enter the number of beds serving individuals.
2004 All Beds (Emergency Shelters Only)
Emergency shelters are usually structures with year-round beds, but there are structures with seasonal beds that are made available to homeless persons during particularly high-demand seasons of the year, usually wintertime. In addition, projects may have overflow capacity that includes cots or mats in addition to permanent bed capacity that is not ordinarily available but can be marshaled when demand is especially great, for example, on the coldest nights of the year. Vouchers are to be identified under overflow beds. The total number of year-round, seasonal and overflow beds would provide a point-in-time snapshot of the housing inventory for homeless people at its highest point in the year.
Year-Round Beds: The number of family beds in (column "Family Beds") **plus** the number of beds for individuals (column "Individual Beds").
Seasonal Beds: The number of beds made available to individuals and families on a seasonal basis.
Overflow Beds: The number of beds, mats or spaces or vouchers that are made available on a very temporary basis.
Current Inventory: List all facilities and voucher programs that are currently operating.
Under Development: List all the projects that are fully funded but are not yet serving homeless people.
Optional Continuum of Care Homeless Service Activity Chart:

Using the format below, describe the fundamental service components of your Continuum of Care system currently in place, and any additional services being planned.

Table 1B : Special Needs (Non-Homeless) Populations

SPECIAL NEEDS SUBPOPULATIONS	**Priority Need Level** **H**igh, **M**edium, **L**ow, **N**o Such Need	**Unmet Need**	**Dollars to Address Unmet Need**	**Multi-Year Goals**	**Annual Goals**
Elderly	L	0			
Frail Elderly	H	125	10,000,000	45	15
Severe Mental Illness	M	15	1.200,000	9	3
Developmentally Disabled	M	15	1.200,000	9	3
Physically Disabled	M	15	1.200,000	9	3
Persons w/ Alcohol/Other Drug	M	15	1.200,000	9	3
Persons w/HIV/AIDS	M	55	4,400,000	33	11
Victims of Domestic Violence	M	10	800,000	6	2
Other (unaccompanied youth)	M	15	1,200,000	9	3
TOTAL			21,200,000	129	43

Transition Table 1C: Summary of Specific Housing/Community Development Objectives
(Table 1A/1B Continuation Sheet)

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/ Objective*
	Homeless Objectives					
SP3A	Assist chronically homeless individuals find and maintain permanent supportive housing.	ESG	# of PSH units produced	60		DH-1
SP3B	Assist persons at risk of homelessness by increasing the supply of quality affordable housing.		# of units produced			DH-1/DH-2
SP3C	Assist in the development of scattered site transitional and permanent supportive housing for homeless individuals and families.	CDBG, HOME, Other	# of units produced	60		DH1/DH-2
SP3D	Support the creation of service programs that teach habilitation skills (basic life skills) such as financial literacy, banking, how to maintain housing, how to apply for a job, to the homeless and those at risk of homelessness.	CDBG	# of programs created, # of persons assisted	50		EO-3
SP3E	Support the creation/expansion of programs that teach family building skills for the homeless or those at risk of homelessness.	CDBG	# of persons assisted	50		EO-3
SP3F	Support the continued operation of emergency shelters.	ESG	Continued operation of emergency shelters.			DH-1
	Special Needs Objectives					
SP1A	Support the creation of additional permanent supportive housing units for persons with special needs.	CDBG, HOME	# of PSH units produced.	50		DH-1
SP1B	Support the creation of transitional and permanent supportive re-entry housing units for persons re-entering the community from the correctional system.	CDBG, HOME, Other	# of PSH units produced	20		DH-1/DH-2
SP1C	Support the expansion of existing “Housing First” treatment programs for persons with substance abuse problems who need supportive housing.	CDBG, Other	# of persons assisted	25		DH-3
SP4A	Assist at-risk youth and their families through comprehensive services that focus on basic needs, mental health services, educational support and social enrichment.	CDBG, Other	# of youth assisted	30		DH-3/EO-3
SP4B	Assist low-income seniors to maintain independent living through home care services and provide guardianship and elder shelter programs to prevent and protect seniors from becoming victims of abuse, neglect, or exploitation.	CDBG, Other	# of seniors assisted	50		DH-3

	Other Objectives					
SP2A	Support the preservation of existing permanent supportive housing and supportive services for persons living with HIV and AIDS in the Providence Entitlement area.	HOPWA	# of PSH units preserved.	50		DH-3
SP2B	Support the creation of new permanent supportive housing units for persons living with HIV and AIDS in the Providence Entitlement area.	HOPWA	# of PSH units created.	25		DH-1/DH-2

***Outcome/Objective Codes**

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	**DH-1**	**DH-2**	**DH-3**
Suitable Living Environment	**SL-1**	**SL-2**	**SL-3**
Economic Opportunity	**EO-1**	**EO-2**	**EO-3**

Table 2A: Priority Housing Needs/Investment Plan Table

PRIORITY HOUSING NEEDS (households)		Priority		Unmet Need
Renter	Small Related	0-30%	H	3052
		31-50%	H	650
		51-80%	M	25
	Large Related	0-30%	H	888
		31-50%	H	138
		51-80%	NSN	--
	Elderly	0-30%	L	1238
		31-50%	L	125
		51-80%	L	50
	All Other	0-30%	H	3233
		31-50%	H	419
		51-80%	H	70
Owner	Small Related	0-30%	M	444
		31-50%	M	255
		51-80%	M	34
	Large Related	0-30%	H	200
		31-50%	H	135
		51-80%	L	71
	Elderly	0-30%	L	894
		31-50%	L	200
		51-80%	L	119
	All Other	0-30%	M	335
		31-50%	M	120
		51-80%	M	195
Non-Homeless Special Needs	Elderly	0-80%	L	
	Frail Elderly	0-80%	H	
	Severe Mental Illness	0-80%	M	
	Physical Disability	0-80%	M	
	Developmental Disability	0-80%	M	
	Alcohol/Drug Abuse	0-80%	M	
	HIV/AIDS	0-80%	M	
	Victims of Domestic Violence	0-80%	M	

Table 2A: Priority Housing Needs/Investment Plan Goals

Priority Need	5-Yr. Goal Plan/Act	Yr. 1 Goal Plan/Act	Yr. 2 Goal Plan/Act	Yr. 3 Goal Plan/Act	Yr. 4 Goal Plan/Act	Yr. 5 Goal Plan/Act
Renters						
0 - 30 of MFI	135	45	45	45		
31 - 50% of MFI	135	45	45	45		
51 - 80% of MFI	15	5	5	5		
Owners						
0 - 30 of MFI	75	25	25	25		
31 - 50 of MFI	100	33	33	33		
51 - 80% of MFI	24	8	8	8		
Homeless*						
Individuals	30	10	10	10		
Families	30	10	10	10		
Non-Homeless Special Needs						
Elderly	0					
Frail Elderly	125	41	41	41		
Severe Mental Illness	15	5	5	5		
Physical Disability	15	5	5	5		
Developmental Disability	15	5	5	5		
Alcohol/Drug Abuse	15	5	5	5		
HIV/AIDS	55	18	18	18		
Victims of Domestic Violence	9	3	3	3		
Total						
Total Section 215						
215 Renter						
215 Owner						

* Homeless individuals and families assisted with transitional and permanent housing

Table 2A: Priority Housing Activities

Priority Need	**5-Yr. Goal** Plan/Act	**Yr. 1 Goal Plan/Act**	**Yr. 2 Goal Plan/Act**	**Yr. 3 Goal Plan/Act**	**Yr. 4 Goal Plan/Act**	**Yr. 5 Goal** Plan/Act
CDBG						
Acquisition of existing rental units	0	0	0	0		
Production of new rental units	0	0	0	0		
Rehabilitation of existing rental units	0	0	0	0		
Rental assistance	0	0	0	0		
Acquisition of existing owner units	0	0	0	0		
Production of new owner units	0	0	0	0		
Rehabilitation of existing owner units	0	0	0	0		
Homeownership assistance	0	0	0	0		
HOME						
Acquisition of existing rental units	0	0	0	0		
Production of new rental units	270	90	90	90		
Rehabilitation of existing rental units	0	0	0	0		
Rental assistance	0	0	0	0		
Acquisition of existing owner units	0	0	0	0		
Production of new owner units	318	106	106	106		
Rehabilitation of existing owner units	78	26	26	26		
Homeownership assistance	20	10	5	5		
HOPWA						
Rental assistance	60	20	20	20		
Short term rent/mortgage utility payments	285	95	95	95		
Facility based housing development	0	0	0	0		
Facility based housing operations	0	0	0	0		
Supportive services	375	125	125	125		
Other						

Table 2B: Priority Community Development Needs

Priority Need	Priority Need Level	Unmet Priority Need	Dollars to Address Need	3 Yr Goal Plan/Act	Annual Goal Plan/Act	Percent Goal Completed
Acquisition of Real Property	M	20	5 million	9	3	
Disposition	M	20	5 million	9	3	
Clearance and Demolition	M	15	3.75 million	3	1	
Clearance of Contaminated Sites	M	20	5 million	9	3	
Code Enforcement	H	25	6.25 million	12	4	
Public Facility (General)						
Senior Centers	M	5	1.25 million	3	1	
Handicapped Centers	M	5	1.25 million	3	1	
Homeless Facilities	M	500	2.5 million	300	100	
Youth Centers	H	25	2.5 million	15	5	
Neighborhood Facilities	H	15	75 million	3	1	
Child Care Centers	M	20	10 million	6	2	
Health Facilities	H	10	5 million	3	1	
Mental Health Facilities	H	10	5 million	3	1	
Parks and/or Recreation Facilities	H	30	30 million	9	3	
Parking Facilities	H	20	20 million	15	5	
Tree Planting	H	50	5 million	21	7	
Fire Stations/Equipment	L	25	20 million	3	1	
Abused/Neglected Children Facilities	H	5,000	1.25 million	75	25	
Asbestos Removal	L	100	1 million	20	5	
Non-Residential Historic Preservation	M	100	10 million	60	20	
Other Public Facility Needs	M	15	1.5 million	12	4	
Infrastructure (General)						
Water/Sewer Improvements	L	20	5 million	15	5	
Street Improvements	H	80	8 million	60	20	
Sidewalks	H	80	8 million	60	20	
Solid Waste Disposal Improvements	NSN	--	--	--	--	
Flood Drainage Improvements	M	20	4 million	12	4	
Other Infrastructure	L	10	2 million	6	2	
Public Services (General)						
Senior Services	M	3,000	6 million	2,000	667	
Handicapped Services	M	125	1.25 million	75	25	
Legal Services	H	300	2 million	75	25	
Youth Services	H	5,000	2 million	3,000	1,000	
Child Care Services	H	1,000	5 million	300	100	
Transportation Services	M	200	1.4 million	100	33	
Substance Abuse Services	M	500	5 million	250	83	
Employment/Training Services	H	3,000	9 million	1,500	500	
Health Services	H	1,500	4.5 million	750	250	
Lead Hazard Screening	H	2,500	2.5 million	2,000	667	

Crime Awareness	H	25	2 million	14	4	
Fair Housing Activities	M	25	500,000	12	4	
Tenant Landlord Counseling	M	25	500,000	15	5	
Other Services	H	7,000	5 million	3,000	1,000	
Economic Development (General)						
C/I Land Acquisition/Disposition	M	20	10 million	9	3	
C/I Infrastructure Development	M	20	10 million	9	3	
C/I Building Acq/Const/Rehab	H	25	125 million	15	5	
Other C/I	NSN	--	--	--	--	
ED Assistance to For-Profit	H	50	3.125 million	30	10	
ED Technical Assistance	H	50	3.125 million	30	10	
Micro-enterprise Assistance	H	50	3.125 million	30	10	
Other	H	50	3.125 million	30	10	

Transition Table 2C: Summary of Specific Housing/Community Development Objectives
(Table 2A/2B Continuation Sheet)

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/ Objective*
	General Housing Objectives					
AH1A	Continue to support efforts to create and preserve affordable housing in the City.	CDBG, HOME, HOPWA, Other	# of units created and # of units preserved.	180 units/3 years		DH-2
AH1B	Work to incorporate affordable housing through incentive zoning or other mechanisms throughout all neighborhoods in the City.	CDBG, HOME, Other	Creation of incentive zoning program.			DH-1
AH1C	Continue to provide bonuses under the performance funding formula to CDCs that develop housing in neighborhoods identified as underserved by the City.	CDBG, HOME, Other	Continued production of housing by CDCs.			DH-1/DH-2
AH1D	Continue to provide bonuses under the performance funding formula to CDCs that develop housing for persons at the lowest income levels	CDBG, HOME, Other	Continued production of housing by CDCs.			DH-1/DH-2
AH1E	Support CDCs efforts in development of new rental and homeownership opportunities through rehabilitation of existing housing and through infill construction.	CDBG, HOME, HOPWA	# of units produced.			DH-1/DH-2
AH3A	Continue efforts to address lead-based paint hazards throughout the City in rental and owner-occupied housing units in housing units built before 1978.	CDBG, LEAD, Other	# of units made Lead Safe.	90units/3 years		DH-3/SL-3
AH3B	Continue to apply for competitive HUD Lead grants for funding of lead abatement projects in the City.	LEAD	# of grants received.			DH-3/SL-3
	Rental Housing					
AH1H	Work to preserve rental units that are at risk due to expiring use restrictions.	CDBG, HOME, Other	# of units preserved.			DH-3
AH4A	Encourage programs that provide mediation services between landlords and low-income tenants that result in necessary health and safety repairs to rental units.	CDBG	Increased participation in programs.			SL-1

AH4B	Support CDCs that provide direct counseling and technical assistance to low-income renters regarding tenant/landlord issues.	CDBG	# of persons assisted.			DH-3/SL-3
AH4C	Encourage and support public education programs regarding fair housing and landlord/tenant issues.	CDBG	Increased participation in programs			DH-3/SL-3
	Owner Housing					
AH1F	Develop new partnerships and resources to provide assistance to existing owner occupants.	CDBG, Other				DH-3
AH1G	Support efforts to preserve owner-occupied rental housing throughout the City.	CDBG, HOME, Other	# of units preserved.			DH-3
AH2A	Encourage homeownership by better promoting existing closing cost assistance and first-time buyer incentive programs.	CDBG, Other	Increased participation in programs.			DH-1
AH2B	Coordinate with CDCs to promote the first-time homebuyer programs available to Providence residents.	CDBG, Other	Increased participation in programs.			DH-1
AH2C	Provide homeownership, financial literacy, and foreclosure prevention counseling to low- and moderate income households.	CDBG, Other	Increased participation in programs.			DH-1
	Community Development					
CD1A	Ensure that neighborhood residents are aware of job opportunities and have skills to benefit from the jobs that become available through business expansion and creation.	CDBG	Increased # of residents with jobs.			EO-1
CD1B	Use the First Source program to connect job seekers with services; including in-person and online courses in resume writing, interview preparation, and computer and software skills. Other services could include: promotion of networking sessions and connecting job seekers with career and skill assessments.	CDBG	Increased use of First Source program.			EO-1
CD1C	Continue to support the Pathways to Opportunities program.	CDBG, Other	Increased participation in program.			EO-1/E0-3

	transportation efforts throughout the City.	RIDOT, RIPTA, FHWA				2/SL-3, EO-1/EO-2/EO-3

***Outcome/Objective Codes**

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

	Other Objectives					
H - 1	Rental Housing Objectives	HOME	# units produced	90 Units		DH-2

*Outcome/Objective Codes

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Table 3B: ANNUAL AFFORDABLE HOUSING COMPLETION GOALS

Grantee Name: **Program Year:**	**Expected Annual Number of Units To Be Completed**	**Actual Annual Number of Units Completed**	Resources used during the period			
			CDBG	**HOME**	**ESG**	**HOPWA**
BENEFICIARY GOALS (Sec. 215 Only)						
Homeless households			☐	☐	☐	☐
Non-homeless households			☐	☐	☐	☐
Special needs households			☐	☐	☐	☐
Total Sec. 215 Beneficiaries*			☐	☐	☐	☐
RENTAL GOALS (Sec. 215 Only)						
Acquisition of existing units	0		☐	☐		☐
Production of new units	90		☐	☒		☐
Rehabilitation of existing units	0		☐	☐	☐	☐
Rental Assistance	20		☐	☐		☒
Total Sec. 215 Affordable Rental	110		☐	☒	☐	☐
HOME OWNER GOALS (Sec. 215 Only)						
Acquisition of existing units	0		☐	☐		
Production of new units	106		☐	☒		
Rehabilitation of existing units	26		☐	☒		
Homebuyer Assistance	10		☐	☒		☐
Total Sec. 215 Affordable Owner	142		☐	☒	☐	☐
COMBINED RENTAL AND OWNER GOALS (Sec. 215 Only)						
Acquisition of existing units	0		☐	☐		☐
Production of new units	196		☐	☒		☐
Rehabilitation of existing units	26		☐	☒	☐	☐
Rental Assistance	0		☐	☒		☐
Homebuyer Assistance	0		☐	☒		☐
Combined Total Sec. 215 Goals*	232		☐	☒	☐	☐
OVERALL HOUSING GOALS (Sec. 215 + Other Affordable Housing)						
Annual Rental Housing Goal	90		☐	☒	☐	☐
Annual Owner Housing Goal	142		☐	☒	☐	☐
Total Overall Housing Goal	232		☐	☒	☐	☐

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IX. Consultation and Citizen Participation Plan

Consultation

Consultation with Neighboring Communities

The City of Providence consulted with neighboring communities during the writing of the Consolidated Plan. Invitations for consultation were extended to East Providence, Pawtucket, North Providence, Cranston, and Johnston. Responses to the request for consultation were not received from these communities. However, Providence and these communities have worked together in the past to address affordable housing issues and other related needs and concerns.

Other Consultations

Other consultations were held with various agencies and groups. The information obtained during these consultations has been included in the appropriate section of the Consolidated Plan. The City also reached out to agencies and service providers notifying them that the Consolidated Plan was being prepared and notifying them of the Focus Group meetings.

Citizen Participation

Citizen Participation Plan

A copy of the City's Public Participation plan is provided in Appendix B and was followed during the preparation of the Consolidated Plan.

Consolidated Plan Steering Committee

The City formed a Steering Committee to assist in the preparation of the Consolidated Plan. The Steering Committee provided important information and invaluable assistance in the preparation of the plan.

Participation

The City advertised in local newspapers inviting Providence residents to participate in the preparation and finalization of the Consolidated Plan and the Annual Action Plan. In addition, notice was provided to agencies and groups that have received or were expected to seek funding through the Consolidated Planning Process. This procedure is also followed during the annual preparation of action plans and performance measures.

Access to Information/Publishing the Plan

The City of Providence solicited comments on the Draft Consolidated Plan by advertising its availability and the deadline for the 30-day comment period in the Providence Journal. The availability of the plan was also posted on the Providence Department of Planning and Development website. When completed, the final Consolidated Plan, as submitted to HUD, will be available at the City of Providence Department of Planning and Development and the Providence Public Library. It will also be available on-line at the City of Providence Department of Planning and Development website.

Anti-Displacement

No displacement of persons is anticipated during the fiscal years of this plan. The City will make every effort to minimize displacement to the greatest extent possible. The DPD will work with any displaced persons in assisting them with support or directing them to various agencies where additional support may be provided depending on the circumstances.

X. Monitoring

All CDBG, HOME, ESG, and HOPWA programs are monitored on an annual basis for contract and programmatic compliance. A program evaluation officer visits the site of each program/project to review all required documentation. Compliance areas include audits, drug free work place documents, and a general review of goals and accomplishments as they are stated in the contract and application. A monitoring report is written up for these program areas which are reviewed by DPD. Findings and concerns are shared with the sub-grantee, with a request for a response and actions to be taken to correct problems.

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XI. Action Plan

Action Plan General Questions response:

It is noted that more than 68% of the population of the City of Providence is determined to be low and moderate income. CDBG, HOME and ESG assistance are provided exclusively to areas which meet the HUD 51% standard, or to individuals meeting the income standards. In addition, areas in the south side of the City including Upper and Lower South Providence, Elmwood, the West End, Olneyville, Charles, Wanskuck, Manton, Valley, Hartford and vicinity, have higher concentrations of minority populations and will benefit from the federal programs cited herein. Assistance is distributed according to need in the City of Providence. More seriously deteriorated areas have always received more services and assistance.

The program described in this submission generally provides support to neighborhood-based and neighborhood-scale projects. The City of Providence has invested in neighborhoods over the two decades of the CDBG program: community centers, public facilities, housing activities, infrastructure, and business development.

The Consolidated Plan includes priority projects within each of the CDBG, ESG, HOME, and HOPWA program elements. This presentation provides information about the needs expected to be served through the programs and projects funded this year as well as the other resources that are needed for their success. The CDBG, ESG, HOME and HOPWA funds are part of an overall program of assistance supplemented by other City funding as well as other private and public (Federal and non-Federal) sources, which together are estimated to be at least 5 times the value of the Federal resources. Leveraging is annually reported in the City's CAPER.

The submitted Action Plan constitutes an application for funds under four different HUD formula programs in these amounts:

Community Development Block Grant (CDBG)	$6,350,495.79
Emergency Shelter Grants Program (ESG)	$ 248,396.00
HOME Investment Partnership Program	$2,689,100.00
HOPWA	$ 874,203.00

These funds will support the activities to be funded for the 2010-2011 program year (July 1, 2010 to June 30, 2011). The totals above include $197881.79 in recaptured CDBG funds reprogrammed for use under this action plan.

The CDBG, HOME, ESG, and HOPWA programs are described in the detailed Projects Workbook that is part of and attached to this Action Plan. In addition, several other Federal programs will be used to directly support aspects of programs funded with one of the above sources. These include the Emergency Heating program and Weatherization program funded by the Department of Energy, EDI Special Purpose Grants, EPA Brownfield, EDA funds and related grant funds, and the HUD Lead Hazard Demonstration Grant made available in previous years for funding housing programs and neighborhood/economic development projects.

The City of Providence, through its Department of Planning and Development, has been striving to coordinate service provided through its HUD-funded Lead Hazard program with the weatherization activities funded by the Department of Energy to the Providence Community Action Program (ProCAP), an entity that is independent of the City. We have developed joint-eligibility criteria, a bi-lingual waiver allowing applicant information/applications to be shared for review, and a process that could result in a coordinated rehabilitation scope of work RFP, contract, and investment. Numerous barriers continue to

Transportation, and Welfare for training, fuel assistance or other activities. The majority of the City's Housing Non-profits participates in the Low Income Tax Credit program and is funded through Rhode Island Housing & Mortgage Finance Corporation (RIHMFC) programs as well as the City's.

Other: In addition, housing projects and activities listed and funded here depend on various private sources for support and from the equity provided through Low Income Housing Tax Credits (LISC), local lending participation and private foundations, both local and national. The City has been particularly successful in recent years developing strategic relationships with such foundations as the Annie E. Casey Foundation, the Wallace Foundation, the Rhode Island Foundation, the United Way of Rhode Island, and the former JEHT Foundation. Other service-oriented activities depend on private foundations, grants, and individual contributions. The City has a multitude of non-profit housing corporations and community development corporations (CDCs) that provide housing assistance. While many depend on CDBG support, most also seek additional private funding sources.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Action Plan Managing the Process response:

As the entitlement grantee for the CDBG, HOME, ESG, and HOPWA programs, the City of Providence, Department of Planning and Development (DPD) is the lead agency for the development of this Annual Action Plan, and for administering programs covered by Consolidated Plan Strategy (CPS).

The Annual Action Plan encompasses an allocation process that is created to be a level playing field for all applicants. To that end, the City requires all applications to be substantially responsive to the annual Request for Proposals. Applications must detail which strategy or goal of the Consolidated Plan it falls under. Applications must also work towards the City's policy of Neighborhood Investment Strategies. Applications also need to meet one or more national objectives. Finally, applicants must apply only for eligible activities.

Applicants are strongly encouraged to attend the technical assistance workshop the City holds to assist agencies and guide them through the application process. Attendance at this event was very high this past year.

Action Plan Citizen Participation response:

Three public hearing were held to solicit comments from citizens and applicants regarding the proposals submitted, the Mayor's recommended CDBG/ESG/HOPWA YR 35 budget, and about needs in the City of Providence. Two of the public hearings were held on February 23 and February 25, 2010, and were located respectively at the Mount Hope Neighborhood Association and the Washington Park Community Center, both from 4 to 7 PM. Numerous organizations testified at the hearings. A final public hearing was conducted on April 14, 2010 at the Department of Planning and Development. Notices of the hearings were posted in the newspaper of general circulation (Providence Journal) and two publications of general circulation in the African American and Latino communities' respectively.

Comments received at the CDBG public hearings focused primarily on explanation of individual programs. Transcripts are on file of the public hearings.

The Mayor's funding recommendations for CDBG were submitted to the URRP Committee. The URRP committee met at least once a week beginning in late March and through the final week of April. Numerous public agencies were called in to give testimony on their programs and their requests. They included Boys & Girls Club, Clinica Esperanza, Rhode Island Free Clinic, Providence Afterschool Alliance, Skate for Joy, and more. There was also a presentation on Neighborhood Markets.

After their evaluations of both programs and community needs a final budget was presented to the full city council for ratification. The council passed this budget by ordinance. Mayor Cicilline has reviewed the ordinance and those changes made by City Council. Those changes have been adopted as part of this application to HUD for its review and approval.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Action Plan Institutional Structure response:

Planned enhancements to be implemented prior to and during the course of FY 2011 includes creating a series of Technical Assistance Workshops for grantees to promote the move toward results-based accountability reporting. Attendance at Workshops will be a contractual obligation on grantees. Additionally, the Department will explore the benefit and feasibility of convening grantees by practice area – e.g. health services, youth development, etc. – to identify ways to coordinate and align practice for improved outcomes.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Action Plan Monitoring response:

The City of Providence, through the Department of Planning and Development (DPD), monitors all CDBG/ESG/HOPWA sub recipients yearly in two areas – fiscal and programmatic compliance with the contract and CDBG/ESG/HOPWA regulations. An introduction letter is sent to sub recipients explaining the purpose of the visit and what DPD will be reviewing. A monitor goes on-site, documents compliance, or noncompliance using forms developed by DPD based on the regulations. Financial monitoring is done by review of the required audit and management letter. Results of the monitoring are forwarded to each agency and technical assistance is offered where necessary.

The City of Providence reviews all project financials and IDIS reports on a quarterly basis. Project components reviewed include expenditure and obligation, implementation (such as plans/specs or bidding) and review of agency capacity. Sub recipients who are untimely are sent letters asking for an explanation of the situation along with notification that funds may be withdrawn if the agency cannot move forward. Funds are generally recaptured once a year and reallocated during the annual CDBG allocation process.

Agencies with concerns or findings must respond with corrective action within 30 days. Additionally, the City conducts workshops, where all sub grantees are invited, to explain M/WBE goals, reporting and timing issues.

Upon receiving completed HOME project information such as, project name if any, Homeowner(s) full name, project address, number of units, number of HOME unit(s) etc. a folder is established using the property address. The folder contains correspondence to the property owner(s), completed Tenants information form(s) with all required documentation requested.

Between the months of June and August, letters are sent out to each property owner indicating that time has arrived for the annual re-certification of all of their tenants. It is clearly explained to the homeowner that it is their responsibility to see that the tenants provide all required documents and they must verify such by reviewing the request document list on the tenant information form before they as the homeowner dates and signs off verifying that the document is complete.

Thereafter DPD receives and reviews the tenant information form along with all other documentations, such as 3 most current pay stubs, W-2 forms, benefit letters, etc. to determine if the tenant as well as the homeowner are in compliance of the HOME program regulations.

The same detailed information is expected from the non-profit organizations, the only difference is as of August 2003, they keep the completed HOME project records at their office and we go out and monitor them for assurance that they are in compliance with requesting, receiving, reviewing and properly maintaining all files.

In connection with the other program enhancements and reforms detailed above, the Department is actively reviewing and revising its on-site monitoring program with the aim of increasing outcome related

data collection. We will work with recipients to help them build the capacity to provide more detailed reporting and to develop the capacity to use the information gleaned through such reporting to inform program design and delivery.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Action Plan Lead-based Paint response:

Rhode Island has the fourth oldest housing stock in the nation. As such, Providence places a high priority on the reduction of lead based paint hazards.

The City of Providence was awarded two grants in 2008 from the OHHLHC. One grant in the amount of $2,450,411 is for the lead hazard reduction demonstration program and the second for $3,000,000 is for the lead-based paint hazard control program. The Department of Planning and Development is administering both grants. The funds are used to make housing units constructed prior to 1978 lead safe, with the demonstration grant targeting those neighborhoods with the highest levels of lead poisonings. Assistance is limited to low-income families with children under the age of 6 or with a pregnant woman residing in the units of the house.

This will be the 4th and 5th lead grants received from OHHLHC and we continue to make units safe from lead based paint hazards within the Providence housing stock. The City is also an active participant in the discussion on the use of funds from lead paint suits that are settled or being settled.

For additional discussion of this grant, please read above where the Department's efforts to align lead remediation with weatherization are discussed.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Action Plan Specific Objectives response:

The CDBG program and the specific projects described in this Annual Plan will, to the limits of funding availability, provide: 1) a wide range of housing opportunities, both rental and homeownership, for low-income families and individuals, which are designed to remove barriers to affordable housing; 2) rehabilitation of existing housing, primarily through housing non-profit agencies, CDCs and the like; 3) reduce lead paint contamination throughout the City; 4) encouraging development of low mod housing in

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).

2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
   a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
   b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
   c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
   d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
   e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
   f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
   a. Describe the planned use of the ADDI funds.
   b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
   c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Action Plan HOME/ADDI response:

During the Program Year, HOME funds will continue to assist eligible families to achieve home ownership, provide affordable housing opportunities, rental unit assistance; assistance to non-profit local Community Development Corporations (CDCs), and cover eligible administrative costs. However, the thrust of the program will remain to achieve a goal of homeownership and a balance of rental units in those areas of the City identified to have low- and moderate-income households, most notably, Upper and Lower South Providence, the West End, Elmwood, Washington Park, Olneyville and similar areas. All eligible families will have an opportunity for assistance under this program.

Recaptured HOME funds - The City's policy is to use recaptured HOME funds for eligible HOME activities, which include promoting affordable homeownership, assistance to local CDCs and eligible program administration.

We will schedule a Fall 2010 round of applications to obligate all funds.

The City of Providence will use the resources of the Providence Housing Trust as match dollars for the HOME program. These funds support the City's Housing Assistance programs which complement the HOME program and also provide assistance in gap to the City's housing CDC's. The funds are primarily from loan program income from Bond issues and tax stabilization payments.

Homeless

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Action Plan Special Needs response:

While the City has experienced level or declining funding of ESG in recent years, the needs of the homeless and the near homeless have increased dramatically. Many homeless service providers also have experienced decreased and/or level funding in foundation, grant funding and in individual donations. The result is a growing difficulty on the part of homeless service providers to meet the basic needs of their clients. The City has and will continue to address emergency shelter and transitional housing needs of homeless individuals and families through the available resources from CDBG as well as the entire ESG grant.

This Year's anticipated ESG grant amount for the City of Providence is estimated at $247,284. Additional HUD grants total $90,000, McKinney-Vento funding leveraged for programs to be funded with these dollars amount to $56,000. Additional federal funds leveraged amount to $833,761. Other leveraged dollars for homeless programs in the City of Providence include $2,370,563 state funding and $1,076,618 in Foundation and Private Charitable giving.

Utilizing funding made available under the American Recovery and Reinvestment Act (ARRA) through newly created Homelessness Prevention and Rapid Re-Housing Program (HPRRP), the City is actively seeking to achieve important progress preventing homelessness among those affected by the current economic crisis.

The implementation of the HPRRP grant represents a significant step forward in the area of coordinated and aligned grants administration, and a potent model for future such efforts.

Four HPRRP grants were awarded within the State. Funds were awarded directly to the State of Rhode Island, the City of Providence, the City of Pawtucket, and the City of Woonsocket. In contrast to standing practice, all four grantees collaborated and issued a single RFP, jointly reviewed and evaluated submissions, and made grant awards and contracted for services on a unified basis. The result is that Rhode Island effectively has a single, state-wide HPRRP system. Grantees are able to focus on service delivery and meeting the needs the clients, not on conflicting or redundant administrative requirements. The participating government departments are collaborating on supporting a single point of contact for monitoring and compliance and oversight of grant administration.

We believe this model is unique in the country and is a powerful example of innovation on the local level in Rhode Island that could prove instructive to other states and could pave the way for further cooperation within the State in the years ahead.

A high degree of coordination exists among the homeless service providers and transitional housing providers throughout the City. In fact, the City has a permanent seat on the HRC Special Needs Committee. Through the HRC comprehensive action plans have been developed that address actions to end chronic homelessness, prevent homelessness, and address the issues of families in homeless situations. The State's Interagency Council on the Homeless provides a coordinating mechanism for all homeless services and fair housing efforts. The City also supports the work of the HRC in developing State –wide plans for community-wide discharge coordination plans.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Action Plan ESG response:

N/A - Entitlement Community

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.
   *Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Action Plan Community Development response:

Descriptions of planned activities are provided in the attached projects workbook. Most CDBG funded activities involve specific geographic locations. These locations are noted on each sheet.

The City's non-housing community development needs will be allocated as follows:

$991,558.59	Public Facility Improvements
$732,297.00	Public Service/Community Centers
$927,771.00	Public Services
$893,410.00	Neighborhood Investment Strategy
$246,056.00	Economic Development Administration
$582,330.50	Section 108 repayment (This includes estimated debt service in connection with Section 108 proposal before HUD.)
$1,109,230.00	General Administration
$219,689.00	Housing Administration
$626,984.00	Non-Profit Housing Administration.

Economic Development activities are primarily conducted by the City of Providence utilizing a revolving loan fund program through the Providence Economic Development Partnership, Inc. (PEDP).

The Revolving Loan Fund Program provides assistance to businesses throughout the City of Providence where, as a direct result of the assistance, a benefit is realized by creating at least one job per $35,000 invested by the PEDP, providing a service currently not available in the neighborhood/city or through eliminating a blighted condition.

The Revolving Loan Fund Program provides assistance to businesses throughout the City of Providence where, as a direct result of the assistance, a benefit is realized either through eliminating a blighted condition or providing assistance to low- to moderate-income individuals. Applications for loan funds are based on the applicant first meeting the threshold requirements of 24 CFR 570.208 and reviewed under the standards of 24 CFR 570.209. All applicants who meet these standards are then processed through the review of the Providence Economic Development Partnership, Inc. on a first-come basis. In addition to those standards set forth under 24 CFR 570.208 and 24 CFR 570.209, the Providence Economic

Capitalizing on ARRA funding, the City of Providence has actively lead the effort to create a Jobs NOW! initiative where wages of newly hired individuals will be underwritten/subsidized in the initial months of employment.

Providence Connects

Operating under the name, "Providence Connects," the City maintains a "First Source" program that requires any business receiving a tax break, grant-in-aid, or has been awarded a project with the City, to hire Providence residents from a list maintained by the Department of Planning and Development.

The Department is also charged with developing and funding training programs to assist City residents to become employable. Recent examples of programs supported by Providence Connects include training in health services, and sustainable landscaping.

The sustainable landscaping class is specifically designed to train individuals for employment that will result out of ARRA-funded investments the Providence Housing Authority will make.

Additionally, the City includes language in school construction/renovation contracts requiring the use apprentices, with the local organization Building Futures designated as the trainer and provider of apprentices. Building Futures coordinates recruitment of apprenticeship trainees with Providence Connects. This is powerful and effective way for the City to leverage investments it is making in school facilities for the benefit of un- and under-employed Providence residents.

Housing and Related Services

The Providence Housing Authority administers the Family Self-Sufficiency program. This program works with public housing residents establish education, job training, and employment goals. The FSS program also allows residents to establish escrow accounts in which they can deposit increases in income that result from their participating in the FSS program. Home ownership is a priority use for these savings, but other uses, including education, are allowable.

Children, Youth and Families

The effect of poverty on children is a special concern. Various public and private agencies are active in addressing this need. The Department of Education works through neighborhood schools as an access point for supportive family services. The Poverty Institute, funded by the Rhode Island Foundation, provides policy research and advocacy on issues affecting low-income people in the state. The City has made major strides meeting the needs of youth through the development of the Providence After School Alliance (PASA) which provides high-quality after-school activities to middle school-aged youth across the City. Through common scheduling, marketing, quality standards, and reporting, PASA has helped fill the void that exists in the lives of too many youth, ensuring that the highest risk hours of the day are not spent unproductively or unsupervised. Efforts are underway to build upon the success PASA has had with middle school-aged youth by expanding the out-of-school options for High School students.

Providence Community Action

Providence Community Action acts as the City's anti-poverty agency. ProCAP provides direct services in heating assistance, weatherization services, emergency housing assistance, interim emergency shelter, and alternative schooling for middle school students. ProCAP also works with a network of neighborhood agencies to provide various programs. These service programs include day care, education and tutorial services, youth programs, senior citizens programs, information and referral, emergency food and clothing, employment training, and health and nutrition.

Property Tax Relief

The state of Rhode Island has a property tax relief program for renters and homeowners based on income and rent burden. Households with incomes below $30,000.00 and pay property tax or rent housing units subject to property tax are eligible to participate.

Economic Development

The City of Providence has worked to create opportunities through economic development. However, the majority of job growth has been in the service sector. The jobs created have not matched the jobs lost; because of this the City will continue to work to develop economic development opportunities which will benefit all of the City's residents. The City is committed to matching residents to jobs through the Providence Connects program.

Poverty Work and Opportunity Task Force

In 2007 the Mayor convened a Poverty, Work and Opportunity Task Force consisting of leaders from the private and public sectors to examine the issues of poverty in the City and to identify strategies to reduce poverty and build the middle class. The Task Force set out specific recommendations and the recently created Pathways to Opportunity Office is actively engage in implementing recommendations in the areas of job training, work supports, access to mainstream financial services, and more. By creating this Office, the City has institutionalized its commitment to a broad-based, inclusive effort to address the needs of low income residents. The Pathways to Opportunity initiative, in addition to receiving significant in-kind and financial support from the City, is supported by the Annie E. Casey Foundation, the Rhode Island Foundation, and led the successful effort to obtain more than $3 million in ARRA funding from the Department of Labor for a "green jobs" training grant.

Non_Homeless Special Need Housing

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Action Plan Specific Objectives response:

There is a diverse special needs population within the State and its municipalities. The subpopulations include elderly, frail elderly, veterans, person with physical, mental or developmental disabilities, substance abuse problems, HIV/AIDS and persons returning to the community. Although each of these populations has its own individual needs, they do share some issues relating to housing development and maintenance of stable living environments. Many require adaptation of the housing units or case management and ongoing supportive service.

In Providence, a variety of transitional housing and permanent housing with supportive services are available to people with special needs as discussed previously. Projects both in terms of Public Facility Improvements and Public Services have been targeted to address the special needs and to complement the other available resources for the following sub-groups:

Elderly/Frail Elderly

Rhode Island's elderly population as a proportion of the total population is 14.5% at the time of the 2000 Census. This is the 4th highest percentage in the country. At the same time, Providence's elderly residents numbered 18,155 or 12.4%. Between 1990 and 2000, the number of elderly in the City fell by 3,647 (16.7%) at a time when the citywide population grew.

The Providence Housing Authority manages 8 developments that serve elderly persons. At one of these developments elderly persons share the development with families; at 5 developments, efficiency and one-bedroom units are available to young disabled persons as well as elderly persons. The age mix at these developments has become a majority non-elderly. Since 1995, two high-rise developments, 398 units have been designated for "elderly-only"; this change from the previous mix of elderly and disabled was implemented in response to occupancy and turnover problems that occurred when "serious lifestyle differences" existed in the same building. The Providence Housing Authority reports a short waiting list for its elderly housing units.

Persons Re-entering the Community

One subpopulation that has special housing needs is persons who have been released from prison. At the time of probation, parole, or full completion of their sentence members of this group need to find affordable housing when they often have limited financial resources and poor histories of employment. There is no system of halfway houses for persons released from prison in Rhode Island. The provision of halfway houses and transitional housing is seen as an important element in moving this subpopulation into stable long term housing situations. Regulations barring persons with criminal records from subsidized housing (both public and private) further adds to this problem. The lack of adequate discharge planning for persons before they are released from prison also exacerbates the problem.

In order to comprehensively address the array of issues associated with ex-offender re-entry, the City has established a Prisoner Reentry Steering Committee with funding and technical assistance support from the City, Rhode Island Foundation, the former JEHT Foundation, and the Annie E. Casey Foundation.

Families and Individuals with Physical Impairments

The 2000 Census identified 9,905 residents of Providence between the ages of 16 and 64 who had limitations in mobility or self-care; this represents 8.4% of this age group. The Census also identified 16,284 persons with a work disability; this represents 13.9% of the city's population of working age. The housing needs of this sub-population do not generally involve supportive services; structural adaptations, like ramps and wider doorways, are often the only additional requirements for providing appropriate housing.

Families and Individuals with Mental Disabilities

Many people with mental disabilities have to deal with the problems of faced by other very low-income persons in addition to the limitations created by their disability. In general, about 70% of people with mental disabilities can function in the community with only the additional need for supportive services. The remaining 30% of this population require some degree of supervised housing. Regular in-home case management needs can accomplish two thirds of the supervised housing demand; the other third of needs are addressed by congregate housing with on site support services.

Families and Individuals with Developmental Disabilities

The Rhode Island Department of Mental Health, Retardation and Hospitals works with a statewide population of 4,000 adults with developmental disabilities, about half of whom live with their families. The Division of Developmental Disabilities offers housings options in over 1,000 community settings for approximately 2,000 people. Settings include apartments, adult foster care placements, condos, group homes with care levels ranging from 24-care to minimal support. There has been an increase in families acceptance of their adult family members with a disability living independently in the community. Additionally, the department reports that approximately 40% of the parents who have adult sons or daughters living at home are over the age of sixty, up 10% from the previous 5 year reporting period. These two factors play a significant role in the increasing number of requests for residential supports that the Department receives on an annual basis.

Families and Individuals with Substance Abuse and Addiction

There are several indicators that families and individuals with substance abuse and addiction problems experience problems in maintaining stable housing situations. The 2003 survey of persons who used emergency housing found that 22.6% of people reporting had experienced drug problems. Providence-based service providers have identified a major gap in services for dually-diagnosed clients and a lack of a coordinated system of for individuals attempting to access appropriate services. The City is helping to lead a project that will leverage existing providers and resources through expansion of services utilizing a coordinated and integrated service delivery model. Through the creation of standardized training for staff conducting screening, identification and referrals, all providers administering services across the spectrum of care substance abuse treatment, case management and mental health services, will utilize the same instrument and have access to the network of provider services. Expansion on existing services is a key component of the by targeting accessibility issues through comprehensive outreach and referral options for clients.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.

2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.

3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.

4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.

5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.

6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.

7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.

8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.

9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Action Plan HOPWA response:

Providence is an entitlement area for HOPWA funds and has the responsibility of operating the HOPWA formula program in eligible RI areas and in Bristol County, Massachusetts.

In 1997, a variety of agencies commissioned a needs assessment and strategic plan on AIDS housing in Rhode Island, “Housing for Persons with AIDS in Rhode Island”. The City adopted the Plan as its strategic plan for HOPWA funds. In its development, the plan had significant public involvement by consumers and non-profit agencies, and providers of housing for persons with AIDS. Providence has followed the priorities and strategies of that plan. In addition, the City of Providence convened a focus group of AIDS housing providers and consumers as part of the process for developing the accompanying consolidated plan.

Action Plan Activity Worksheets

XII. Certifications

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