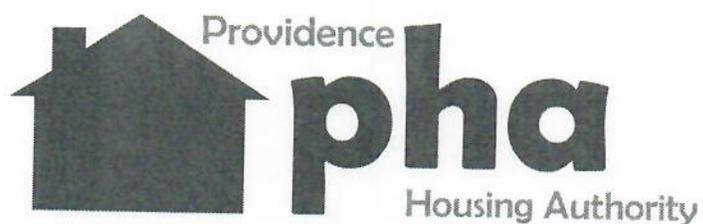


The Providence Housing Authority

FY 2019 Re-Submitted Annual Plan



**Streamlined Annual
PHA Plan
(High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 02/29/2016

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A. PHA Information.

A.1 PHA Name: Providence Housing Authority PHA Code: RI001
 PHA Type: Small High Performer
 PHA Plan for Fiscal Year Beginning: 07/19
 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
 Number of Public Housing (PH) Units 2,606 Number of Housing Choice Vouchers (HCVs) 2,518
 Total Combined 5,124
 PHA Plan Submission Type: Annual Submission Revised Annual Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The PHA's proposed Plan, Plan Elements, and all information relevant to the public hearing were available for inspection by the public at the PHA's Administrative Offices, 2nd Floor, 100 Broad Street, Providence, R.I. The public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from its streamlined submissions. PHA posts approved Plans, including updates the Administrative Office and at Management Offices located at: 285-F Chad Brown Street; 144 Dodge Street; 31 Salmon Street; 100 Atwells Avenue; 243 Smith Street; 160 Benedict Street; 25 Tobey Street, 300 Hartford Avenue, and 100 Broad Street. PHA posts PHA Plans on its website and provides each resident council a copy of its Plans.

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA: N/A					

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Homeownership Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Substantial Deviation.
- Significant Amendment/Modification

(b) The PHA must submit its Deconcentration Policy for Field Office Review.

(c) If the PHA answered yes for any element, describe the revisions for each element below:

Financial Resources

See attached Statement of Financial Resources Form

Safety and Crime Prevention

PHA added a new strategy to its element concerning safety and crime prevention. PHA, with a Victims of Crime Act (VOCA) grant, has created a VOCA Safety Coordinator to provide direct services to victims of crime residing in PHA developments and participating in the HCV program, as well as developing an awareness of all residents of the impact of crime and availability of prevention and intervention resources in the community.

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Conversion of Public Housing to Tenant Based Assistance.
- Conversion of Public Housing to Project-Based Assistance under RAD.
- Project Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

Hope VI/Choice Neighborhood and Mixed Finance Modernization or Development/Demolition and/or Disposition/Conversion of Public Housing to Tenant Based Assistance/Conversion of Public Housing to Project-Based assistance Under RAD

PHA plans to consider all strategies noted in HUD's Repositioning of Assets Initiative, including Choice Neighborhood Initiative, demolition and/or disposition under Section 18, conversion of public housing to tenant-based assistance, RAD, and any combination of recapitalization that should be considered to preserve hard units for the low-income families PHA serves.

Update on Approved Disposition of Property

A disposition application was submitted by PHA and approved by HUD in 2007 for a small portion of land located behind its elderly high-rise building known as Dominica Manor in order to permit a neighboring land owner, Talon Realty, LP, to construct shared parking facilities in

	<p>conjunction with its proposed construction of a new commercial and residential development to be known as Vista Delle Torre. In January 2012, the PHA entered into a Conveyance and Easement Agreement with Talon Realty, LP, that granted to it the right to right to obtain ownership to the designated portion of land with the understanding that it would pay a fee to the PHA and provide 50 spaces of reserved parking for Dominica Manor residents upon completion of construction. In March 2015, the PHA learned that the Vesting Period specified in its Agreement (which was based on the then current Zoning Ordinance of the City of Providence) was delayed pursuant to State law with passage of R.I.G.L. §4524-61.1. The Housing Authority currently awaits further action by the Talon Realty, LP or the final expiration of its building and zoning approvals.</p> <p><u>Project-Based Vouchers</u> PHA will project-base 50 of its existing allocation of HCV Program vouchers as a strategy to deconcentrate poverty and provide program participants with increased access to units in neighborhoods of opportunity. The PHA issued a Request for Proposals (RFP) seeking landlords from across the City interested in project-basing units. The RFP's evaluation criteria included the awarding of points for responses proposing project-basing in neighborhoods of opportunity and neighborhoods with a high degree of revitalization activity. PHA will explore project-basing up to 30% (including 10% exception units) of its HCV allocation based on the outcome of this pilot project-basing activity.</p> <p><u>Units with Approved Vacancies</u> The PHA anticipates that it will have eight units with approved vacancies for modernization in FY 2019.</p> <p><u>Other Capital Grant Programs</u> PHA has received an award, in the amount of \$974,400, from HUD's Lead-Based Paint Capital Funds Program to conduct lead-based paint testing and abatement at the following developments: Chad Brown; Hartford Park; and Manton Heights. This funding award is in addition to the Capital Fund Award amount already provided to PHA for FY 2018 planned capital projects. Testing has been conducted at all of these developments but additional tests will be conducted if necessary, as well as various lead abatement projects to be completed in FY 2019.</p> <p><u>Renewal of Designated Housing Plan</u> In FY 2019, PHA, after consultation with the RAB, decided to seek renewal of its elder-only designation of the Dominica Manor and Carroll Tower developments. PHA put the draft designated housing plan out for a 45- day comment period and a public hearing. The Board voted in March 2019 to approve the plan and seek HUD approval.</p> <p><u>Policy for Over-Income Families</u> In FY 2019, PHA developed, in collaboration with the RAB, a proposed over-income policy that requires residents of public housing whose family incomes exceed 120% of the area median income to move out of public housing. PHA put the proposed policy out for a 45- day comment period and public hearing. The Board voted in March 2019 to approve the policy.</p>
<p>B.3</p>	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>Please see the attached document highlighting the PHA's progress in meetings its mission and goals described in the 5-Year Plan.</p>
<p>B.4.</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: As part of the Section 8 project-based program under HUD, PHA is required to prepare HUD-52663, Requisition for Partial Payment of Annual Contributions, 90 days before the beginning of their fiscal year and transmit it to HUD. HUD-52663 for fiscal year ending June 30, 2018 was filed on April 11, 2017, 81 days prior to the beginning of the fiscal year. Therefore, PHA did not meet the requirement of filing 90 days before the beginning of fiscal year ending June 30, 2018. The delinquent report filing was attributable to the prioritization of department resources towards operations over reporting. The Authority has since implemented controls to ensure completion of required HUD forms in a timely manner.</p>
<p>Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.2	<p>Civil Rights Certification.</p> <p><i>Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.</i></p>
C.3	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N Please see attached document. <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.4	<p>Certification by State or Local Officials.</p> <p><i>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.</i></p>
D	<p>Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
D.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>The PHA's most recent HUD-approved 5-Year Action Plan was approved by HUD on 5/22/18.</p>

**Providence Housing Authority Statement of Financial Resources:
Planned Sources and Uses**

Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2019 grants)		
a) Public Housing Operating Fund	\$14,753,039	
b) Public Housing Capital Fund	\$6,400,836	
c) HOPE VI Revitalization	\$0	
d) HOPE VI Demolition	\$0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$21,851,204	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	\$0	
g) Resident Opportunity and Self-Sufficiency Grants	\$1,679,446	
h) Community Development Block Grant	\$109,471	Tot lot at Hartford Park and safety and security improvements at various developments
i) Home	\$0	
Other Federal Grants (list below)	\$0	
HUD Lead-based Paint Capital Funds Program	\$974,440	LBP testing and abatement at Chad Brown, Hartford Park and Manton Heights
Victims of Crime Act	\$138,566	Community Safety Coordinator
SAMHSA State Opioid Response Grant	\$300,000	Joint project with Pawtucket HA to promote wellness and reduce opioid use
2. Prior Year Federal Grants (unobligated funds only) (list below)		
	\$0	
	\$0	
	\$0	
3. Public Housing Dwelling Rental Income	\$8,307,700	
4. Other income		
Excess Utilities	\$86,700	
Investment Income	\$12,500	
Fraud Collection S8	\$10,000	
S8 Port Fees	\$63,132	
Miscellaneous Tenant Charges	\$48,900	
Misc Income -Antenna Rental/Cox/Office space	\$1,321,400	

Sources	Planned \$	Planned Uses
4. Non-federal sources (list below)		
State/Local - Rhode Island	\$0	
Rhode Island Housing/Woonasquatucket River Watershed Council	\$155,370	Biking and walking pathway connecting Woonasquatucket Greenway and Manton Heights
Rhode Island Foundation	\$50,000	Funding for security deposits and payment of utility bills of HCV and PH participants to prevent homelessness
United Way of Rhode Island	\$12,000	Digital literacy classes and devices
Rhode Island Department of Public Health	\$4,888	Emergency preparedness plans
R.I. Division of Elder Affairs	\$28,322	Partially fund security guards in elderly high rises
City of Providence	\$12,049	Security cameras
City of Providence	\$31,240	Summer youth employment
Total Resources	\$56,351,203	

Attachment B.3

Providence Housing Authority's Update on Goals and Objectives in 5-Year Plan

1. Continue to operate and adhere with federal, state and local mandates as well as formal regulations associated with public housing authorities.

PHA, with assistance from a consultant from Nan McKay, comprehensively reviewed its Administrative Plan for the HCV program, the Public Housing Admission and Continued Occupancy Plan (ACOP), and the Family Self-Sufficiency Action Plan in FY 2018 and began the process of drafting updates.

Fair Housing Act: In FY 2019, staff drafted revisions to Chapter 2 of the Public Housing ACOP and the HCV Program Administrative Plan. Revisions updated policy relating to non-discrimination, serving persons with disabilities and improving access to persons with limited English proficiency. PHA also revised the Section Administrative Plan concerning adoption of participation in the Rhode Island Centralized Waiting List and the adoption of local preferences for the PHA's new Mainstream Voucher Program. In FY 2019, PHA revised its Family Self-Sufficiency Program Action Plan. The activity of revising policies, and plans was done in consultation with the Resident Advisory Board and applying public comment procedures; PHA anticipates Board approval and implementation of these revised policies and plans before the end of 2019.

Policy Concerning Over-Income Public Housing Residents: In FY 2018, PHA monitored the number of residents whose family income has exceeded 120% of the area median income; in FY 2019, PHA anticipates revising its policy concerning the treatment of an over-income family when a second annual income determination indicates the family's income continues to be in excess of 120% of median area income.

Renewal of PHA Designated Housing Plan: In FY 2018, PHA monitored its elderly only designation of Dominica Manor and Carroll Tower, two high-rise buildings that are home to 398 elderly families. PHA intends to seek HUD approval to renew the elderly only designation of Dominica Manor and Carroll Tower in FY 2019.

Update on the Vera Institute of Justice Project: As a result of a collaboration with the Vera Institute of Justice in FY 2017, PHA revised its public housing applicant screening policy In FY 2017 to decrease the look-back period when considering involvement in criminal behavior from 10 years to 5 years for felony criminal acts, remove consideration of involvement in misdemeanor criminal activity in screening considerations, and provide all applicants with a history of criminal activity the opportunity of a review meeting with PHA to discuss criminal history and provide evidence of mitigating circumstances or rehabilitation prior to any decision-making concerning eligibility. PHA implemented the new policy in FY 2018. In the first year of implementation, PHA identified 81 individuals with past criminal convictions who were offered a review meeting. Of these 81 individuals: 60 appeared for a review meeting and were considered for eligibility; 7 applicants were found ineligible due to the nature of the criminal history and absence of evidence of mitigating circumstances or rehabilitation; 6 were placed on deferred status until pending criminal charges could be resolved; and 31 were later found ineligible due to non-criminal history issues. Of the remaining applicants who were found to be eligible after the review meeting, 23 were offered a unit in public housing. Fifteen of these individuals accepted the unit offer and became tenants and eight refused a unit offer due to the location or size of the unit. Thirteen of these tenants maintained their tenancies; two were evicted for reasons involving lease violations not involving criminal behavior.

Handicapped Accessibility, Reasonable Accommodation, and VAWA: In FY 2018, the Facilities Maintenance Department completed renovations necessary for the creation of fully handicapped accessible units. Five percent of PHA's housing stock is now fully handicapped accessible. In order to ensure prompt and consistent responses to requests for reasonable accommodations, PHA established a multi-disciplinary committee, led by PHA's Reasonable Accommodation Coordinator (Director of Tenant Selection and Property Management) to review and respond to all requests in FY 2018. This committee, comprised of Facilities Maintenance, Leased Housing, and Property Management representatives as well as the Executive Director, meets twice per month to review and act upon requests. The PHA has designated one staff member to serve a VAWA Coordinator who is responsible for receiving and responding to emergency transfer requests from residents from all properties.

This coordination system ensures a prompt and consistent response to VAWA requests. A new Victims of Crime Act (VOCA) grant-funded Community Support Coordinator will work closely with the VAWA Coordinator in FY 2019.

2. Continue to (1) research and explore modern, affordable housing strategies and programs, (2) generate opportunities with public, non-profit and private partnerships that result in the creation of affordable housing and (3) seek membership in appropriate organizations advocating for affordable housing (Choice, comprehensive neighborhood revitalization initiatives, the Rental Assistance Demonstration).

Over the past year, two members of the PHA staff joined the membership of the Rhode Island Continuum of Care (RiCoC), in which PHA was not previously represented. PHA and its partners in the RiCoC identified a significant need for housing resources for non-elderly persons (between the ages of 18 to 61) with a disability who are: transitioning out of institutional settings; at serious risk of institutionalization; homeless; or at risk of becoming homeless. PHA has received an award of 50 vouchers from HUD to establish the Mainstream Housing Voucher Program; the effective date of these vouchers in 1/1/19. We anticipate leasing these vouchers in July 2019 when the process of PHA joining the Rhode Island centralized waiting list, administered by Rhode Island Housing (RIH), is complete. PHA continues to work to determine with RIH if the centralized waiting list process could be completed more quickly so leasing of the Mainstream vouchers could occur before July.

In FY 2018, PHA convened two community stakeholders' meetings to solicit input and comments concerning the Family Self-Sufficiency Program, Jobs Plus Providence, and the PHA's intention to project-base HCV vouchers to support affordable housing for low-income residents. PHA received helpful guidance through these community engagement activities, including engaging the assistance of community partners in the development of a Request for Proposals for the project-basing of 50 of the PHA's HCV vouchers.

PHA was a past recipient of a Choice Neighborhoods Planning Grant (2010) for the Manton Heights public housing site and the Olneyville neighborhood. The PHA officially submitted the final Transformation Plan ("Build Olneyville Plan") to HUD on June 27, 2014. Although PHA and its community partners were not successful in securing a Choice Neighborhood Implementation Plan due to a lack of ability to secure matching funds, the collaboration remains strong and we continuously seek and support opportunities for neighborhood revitalization, redevelopment, and creation of mixed-income communities. In the past year, notable development has occurred in the Choice Neighborhood Transformation Plan target area, including the renovation of a former factory on King Street into 60 housing units by a developer known as Trinity Financial. Fifty-four of the sixty units are designated by the owner as affordable housing units. Although this development passed a City inspection and the owners obtained a certificate of occupancy, the property did not pass HQS standards because units do not have a window in the bedrooms. PHA filed a request for a waiver from the HQS standard in November 2018. HUD has approved a waiver which is now allowing 20 low-income families to use their HCV vouchers to access these new units at the King Street development.

During FY 2018, various inquiries have been made to determine the PHA's interest in the purchase and/or leasing of unused land adjacent to PHA properties. In the future, with HUD approval, the PHA would like to consider the purchase and/or leasing of land in order to enhance operations, property amenities and/or the surrounding neighborhood.

In FY 2018, PHA staff participated in NAHRO, Nan McKay, and CLPHA training events and conferences concerning RAD components 1 and 2. The PHA will consider all strategies noted in HUD's Repositioning of Assets Initiative, including Choice Neighborhood Initiative, demolition and/or disposition under Section 18, project-basing vouchers, conversion of public housing to tenant-based assistance, RAD, and any combination of recapitalization that should be considered to preserve hard units for the low-income families PHA serves. PHA is an active member of NAHRO and keeps abreast of and engaged in efforts designed to advocate for affordable housing.

3. Continue to create, maintain and nourish sustainable partnerships with community stakeholders in order to increase opportunities that positively impact PHA residents, properties and employees.

PHA is engaged in a wide range of sustainable partnerships with community stakeholders in order to increase opportunities that positively impact PHA residents, properties and employees. The following are examples of the fruits of the PHA's efforts to create and maintain partnerships:

Family Unification Program. PHA applied in FY 2018 for up to 100 vouchers through the Family Unification Program (FUP) that would provide vouchers for families involved in the State's child welfare program, as well as homeless and at-risk youth. The application involved a collaborative effort with the Pawtucket and Newport housing authorities, with Providence as the lead agency. The RI Continuum of Care which coordinates housing resources for homeless people across the state, and the Rhode Island Department of Children, Youth and Families were key partners in the application. Although PHA was not selected as an award recipient, PHA received recognition from partners in the Continuum of Care and across State government for our efforts to bring FUP resources to Rhode Island. As a result of this collaborative application, PHA made relationships that resulted in PHA being approached by the Rhode Island Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals to partner in the Health and Wellness and Housing Stabilization Program now funded by a SAMHSA State Opioid Response Grant. The substantial work involved in developing this application together with state and other HA partners positions the PHA to respond to future RFPs or to consider pilot programs to serve families involved with the child welfare system.

Health and Wellness and Housing Stabilization Program /SAMHSA State Opioid Response Grants (SOR): The Rhode Island Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) is the recipient of Federal Fiscal Year 2018 SAMHSA State Opioid Response Grant (SOR). The program aims to address the opioid crisis by increasing access to medication-assisted treatment, reducing unmet treatment need, and reducing opioid overdose related deaths through the provision of prevention, treatment and recovery activities for opioid use disorder (including prescription opioids, heroin and illicit fentanyl and fentanyl analogs). Through this grant, BHDDH has awarded a contract to PHA, in the amount of \$300,000 to ensure trauma-informed housing retention services are provided to young adults and families who experience conditions that place them at higher risk for opioid use disorder including, involvement with the Department of Youth and Families, housing instability, and low-income status. PHA is partnering with Pawtucket Housing Authority to use the funds to pilot the Health and Wellness and Housing Stabilization Program in both housing authorities, with PHA administering the grant funds. This grant may be renewed for an additional year upon successful completion of Year One. A part of this program will provide opioid abuse awareness training and prevention strategies to PHA residents, program participants, and employees. This program is being launched in April of 2019.

Dunamis Synergy Initiative. In early July 2018, PHA was informed that the State of RI Health Department and West Elmwood Housing received a \$1.8M federal grant from the U.S. Department of Health and Human Services to support the Dunamis Synergy initiative. While the initiative ultimately seeks to develop housing for young families where the parents are pursuing higher education, this grant will allow a range of partners, including PHA, to work together to provide and coordinate services to teen and young adult parents pursuing education, including young parents living in public housing and those receiving Section 8 rental assistance. The grant will provide funds for a community navigator hired by West Elmwood Housing to work two to three days a week at a PHA family site, allowing public housing, HCV program participants, and external neighborhood residents access to educational and supportive services. This program has been initiated in early 2019.

ConnectHomeUSA: Digital Equity and Inclusion Initiative: Recognizing that Internet access and digital literacy are critical in our efforts to promote resident self-sufficiency and close the digital divide, PHA has long provided residents with access to computer labs and technology education. Although these labs are important components to our Resident Services programming, in-home access to low-cost Internet and technology continue to be key resident empowerment and self-sufficiency goals for our communities. PHA joined the State of Rhode Island's Office of Innovation as one of several housing authorities in the State to participate in a national digital inclusion pilot project led by HUD and EveryoneOn called ConnectHomeUSA. The initiative led to funding for digital literacy training for residents and PHA joined Pawtucket and Rhode Island Housing in a pilot to collect data as part of our annual re-certification process regarding digital access. We look forward to using the survey piloted with HUD and Rhode Island Housing and using HUD Form 50058 to collect and share survey data with HUD and ConnectHome. In FY 2018, PHA was selected as a stand-alone member of ConnectHomeUSA. PHA looks forward to the ways in which we can learn from the best practices of earlier ConnectHomeUSA cohort groups, how our ConnectHomeUSA partners may be able contribute to

fruitful discussions with service providers to identify ways to provide low-cost Wi-Fi and device access, and continue exploring opportunities to fund programs that provide access to training and tools residents need to live, connect, and work in an internet-based world. On December 6, 2018, PHA conducted its ConnectHome convening event, which was attended by partners from the non-profit, for profit, public and philanthropic sectors.

Family Support: In collaboration with the Children and Youth Cabinet, PHA provided residents of the Chad Brown development with the Familias Unidas program, consisting of in-home visiting and weekly group sessions over a six-week period. The program, funded and conducted by Family Service of Rhode Island, was designed to increase family communication, parenting skills, and problem solving. Participants expressed a high degree of satisfaction with the program and reported a significant and positive impact on families. PHA intends to repeat the program in FY 2019 and/or to pursue other opportunities to bring evidence-based interventions to our family developments through partnerships, including another CYC-supported program called Strong African American Families.

Food Insecurity and Access to Fresh Fruits and Vegetables. In FY 2018, PHA continued two important initiatives that address food insecurity and access to fresh fruits and vegetables for public housing residents, especially elders and persons with disabilities: *Parenti Villa Food Pantry*, *Food on the Move Mobile* market, and the expansion of the Senior Box Program that provides boxes of food monthly. At Parenti Villa, ten resident volunteers team-up with PHA staff each month to distribute a wealth of fresh produce, canned goods, and other vital food items. This initiative, a partnership with the Rhode Island Community Food Bank, served 80 individuals and 74 households each month in FY 2018. At four of the PHA's six sites for elders and persons with disabilities, residents had access to fresh, nutritious and affordable fresh fruit and vegetables at weekly *Food on the Move* mobile markets. This partnership with *Food on the Move* results in residents receiving a discount when they use SNAP benefits to purchase produce at these mobile markets. PHA is advocating for a mobile market to be sited at one of our family developments as well in FY 2019. Recognizing a need for increased access to food by elders, PHA added to two senior box Programs at Dexter Manor and Dominica Manor in FY 2018.

Manton Project Bike and Walking Path Project. A partnership, among PHA, the City of Providence, the Acquisition and Rehabilitation Program of Rhode Island Housing, and the Woonasquett River Watershed Council, will create a new resource for the residents of the Manton Heights development and the surrounding community. The path will connect Salmon Street, the Manton Heights development, and the Woonasquett River Greenway via a new sidewalk and winding path in 2019. New signage, fencing, and plantings will create a more secure, visible, and easy to maintain amenity for neighborhood residents utilizing the Greenway for exercise, recreation, or transportation in general. Because this funding is structured as a forgivable loan with a mortgage, the award documents are being reviewed by HUD before PHA moves forward.

4. Continue to provide quality service to meet stakeholder expectations through conducting a comprehensive service satisfaction survey, updating operational goals and monitoring performance management indicators.

PHA has instituted regularly scheduled walk-throughs of properties by a multi-disciplinary team of staff. These events provide an opportunity for staff and residents to interact; walk-throughs often involve home visits to residents to gather information about customer satisfaction levels and resident needs for services and programs. Regularly scheduled Resident Advisory Board meetings provided an opportunity for staff to obtain valuable feedback from resident leaders concerning the needs for services and programs, as well a wide range customer service issues. During walk-throughs and in meetings, residents have provided feedback that parking is a source of dissatisfaction and conflict in some developments. In FY 2019, PHA will explore options for increasing parking, as well as examine if new parking policies and enforcement of them could increase parking options for residents and improve resident satisfaction in this area. In the past year, we have successfully applied to the City of Providence to allow some residents at several developments to receive permits to park overnight on City streets (such permits are usually not given to residents at six-unit-plus developments).

This year, PHA will integrate a bilingual orientation video developed in FY 2018 into the public housing admissions process. The goal of the video is to provide applicants with comprehensive information regarding their lease, house rules, opportunities, programs, amenities and policies in order to maximize their housing experience and establish clear expectations between

residents and management. Also, in the coming year, PHA will explore new methods for gathering satisfaction information from residents and program participants.

As a means of updating operational goals and monitoring performance management indicators, all Departments are required to provide detailed, written reports on a monthly basis that serve to update the Board and Executive Team on the status of performance management goals and indicators. These reports inform decision-making regarding overcoming obstacles to meeting operational goals and performance management indicator benchmarks, as well as guiding updates to and developing new strategies for meeting goals and performance indicator benchmarks.

5. Continue to cultivate Resident Advisory Board and Resident Association relations and communication to maintain transparency and provide a forum for valuable resident participation in planning activities guided by PHA goals and objectives.

In FY 2018, PHA convened a Resident Advisory Board (RAB) retreat/meeting on June 20th. Nine members of the RAB from six different developments attended along with five PHA staff. Attendees discussed Resident Advisory Board by-laws, a request for conflict resolution training to increase RAB members' leadership skills, and ideas for future RAB activities and meeting agendas. The resident nomination process for the RAB and the resident representative on the Board of Commissioners occurred in May, June and July of 2018. After PHA Management received completed nomination forms, it reviewed the forms for "good standing" verification and forwarded a list of the residents interested in being considered for the Board of Commissioners to the Mayor of the City of Providence for his consideration over the following year. The new RAB held its first meeting in September and approved new by-laws in October, which included a provision that will allow RAB members to serve two-year rather than one-year terms beginning in FY20.

PHA continued to convene regularly scheduled meetings with the RAB and Resident Associations as a means of increasing resident participation in planning and governance of the PHA. Meetings continued to be well-attended, with resident leaders providing valuable information and guidance to staff. Staff from PHA Departments attended these meetings to provide answers to questions, note and address customer service issues, and to gather information about needed services and programs. PHA worked with existing tenant leaders to identify impediments to the formation of additional resident associations. In the coming year, PHA looks forward to working with tenant leaders to develop and deploy a strategy that results in the formation of more fully developed tenant councils.

In response to the RAB request for conflict resolution training, PHA is researching conflict resolution training programs and is implementing a two-session training program for the RAB in April of 2019.

6. Continue to improve the appearance of PHA properties, reduce work order and unit turnaround time, reduce energy consumption and costs as well as conduct authority wide inspections and proper procurement processes.

Appearance of Properties: In FY 2018, PHA piloted a new "Walk-through Initiative" in which the directors and staff of Property Management, Facilities Management and Residents Services walked the grounds of developments. The main purpose of this initiative was to increase the PHA's presence on the grounds, promote resident engagement and stimulate staff and resident accountability in all PHA communities. Additional staff from across the agency are now being encouraged to participate. Regularly scheduled walk-throughs of properties conducted by these teams assisted in identifying development appearance issues for which the Facilities Management Department implemented prompt corrective action. The Walk-through Initiative will continue and will expand in scope in the coming year.

Reducing Work Order and Unit Turnaround Time: The Facilities Maintenance Department established a Unit Turnaround Task Force, comprised of an inter-disciplinary team of maintenance staff, which is deployed to design and implement a vacancy reduction strategy in developments whenever a pre-determined vacancy threshold occurs in a development. The team coordinated closely with Property Management and Applications staff to forecast vacancies and ensure prompt leasing of returned units. During FY 2018, there were 37,779 work order (WO) requests; a 9% increase from FY 2017 (34,624). The average length of time to complete a WO was 7.4 days in FY 2018, an increase of one day per WO from the previous year (6.4).

There was a 12% increase in the number of vacancies, with 337 vacant units authority-wide during FY 2018, up from 300 units from the previous year. The average vacancy days for unit turnaround in FY 2018 was 32 days; an increase of seven days from FY 2017 (25 days). The increases in unit turnaround and WO completion days is largely attributable to the 9% increase in vacancies, 12% increase in WOs, and the number of scattered site units requiring extensive repairs in FY 2018.

Reducing Energy Consumption Cost: The Facilities Maintenance Department continued to partner with National Grid and RISE Engineering, National Grid's regional program administrator of the EnergyWise program. RISE has provided energy assessments and upgrades that have lowered energy-related operating costs. Some of the upgrades were provided at no cost to PHA, the cost of others was covered by ratepayer-funded financial incentives and rebates. Included in energy upgrades to date have been high-efficiency lighting upgrades and controls, high-efficiency heating and cooling equipment and controls, and insulation. The value of no cost upgrades to PHA properties is nearly \$1 million over the past several years. In FY 2019, the PHA will partner with RISE to replace inefficient boilers at Dexter Manor.

Authority-wide Inspections: PHA contracted with U.S. Inspection Group to conduct pre-inspections of all units in FY 2018. PHA has contracted with Nan McKay & Associates to conduct annual pre-inspections of all PHA units in FY 2019.

Proper Procurement Process: PHA, as a result of examining departmental functions, restructured its Finance Department to include responsibility for agency procurement, with Procurement transferring from Facilities Maintenance. The re-assignment of this key function will result in increased efficiency and a streamlined process for procuring goods in a manner that maximizes savings.

7. Continue to maintain public housing occupancy rates above 97%, stream line the application process and improve tenant collections.

In FY 2018, PHA continued to consistently maintain occupancy rates above 98%. At 6/30/18, the PHA –wide occupancy rate was 99.2%, with four of the PHA's 13 developments at 100% occupancy. This PHA accomplishment is attributed to enhanced communication between Admissions, Property Management, and Facilities Maintenance supervisory staff in a teamwork approach that better tracks vacancies and fosters unity of efforts in attaining a shared goal of unit turnaround time at 21 days or less. HUD Guidelines provide 14 days for a vacant unit to be returned for leasing and seven days for Admissions staff to process an application and property management staff to lease a unit. This occupancy accomplishment is also attributed to a new system of processing applications that assigns concrete tasks in the application screening process to individual staff, as well as to property management staff prioritizing the showing and leasing of units in the field. The Facilities Maintenance Department's Vacancy Turnaround Task Force supported maintaining occupancy rates above 97% by applying specialized strategies to developments with vacancy rates exceeding pre-determined benchmarks.

To improve collections, the PHA instituted a system whereby the Property Management Department supervisor tracks the collection rates of each property manager and participates in developing general and site-based strategies to improve tenant collections. Included in strategies developed is the request for inclusion of a clause in every court repayment agreement that requires the resident to make timely rent payment for the next twelve months, a measure, that when coupled with a referral to financial literacy training, often results in residents developing improved rent payment habits. The Court enforces these agreements when a resident fails to make timely rent as agreed. PHA ended FY 2018 with an authority-wide collection rate of 89%; the goal for FY 2019 is a 93% collection rate. In the coming year, PHA will review the effectiveness of existing collections strategies, develop new strategies, and institute training to deploy new strategies.

8. Continue to maintain Section 8 leasing rates (at least 95%), monitor the de-concentration policy and rent reasonableness standards, develop innovative methods to re-open the waiting list, maximize administrative fees, expand the VASH voucher program and refer participants to the Family Self-Sufficiency and Homeownership Programs.

HCV Program Performance. PHA has consistently utilized budget authority at or above 97% and PHA accomplished high performer status once again in FY 2018. The Department closely monitored the de-concentration policy and received the de-concentration bonus points on SEMAP this year. PHA expanded its VASH Program by receiving 8 additional vouchers in FY

2018 – the effective date of these new vouchers is 2/1/19 and our new total allocation is 219 vouchers. In FY 2018, the PHA Board of Commissioners voted to join the RI Centralized Waiting List for the HCV program; the centralized waiting list will be administered by Rhode Island Housing. PHA anticipates a start date of 7/1/19, but it continues to work to determine with RIH if the centralized waiting list process could be completed more quickly. PHA looks forward to both the efficiency to PHA and the expanded access to housing opportunities for applicants that membership in a centralized waiting list will provide.

Outreach to Landlords: In an effort to outreach to and attract more landlords to the HCV program and to educate existing HCV program landlords in FY 2019, PHA will partner with the City and other organizations to explore the possibility of outreach vehicles, such as a newsletter or e-mail blasts communicating training opportunities and information about accessing weatherization or lead-based paint abatement programs and designing and delivering workshops for landlords to provide education about a range of issues, including fair housing and availability of local, state and federal funds to improve affordable housing conditions, including weatherization and lead-based paint abatement programs. In the coming year, PHA will explore the possibility of developing and administering a survey to HCV landlords to solicit information about how PHA can enhance service to landlords and provide them with useful information.

FSS and Homeownership: In FY 2018 four HCV families became new homeowners through the PHA Homeownership Program. At the end of FY 2018, PHA had 55 homeowner families in the program. In addition to these families, since the programs' inception in 2003, 30 other families became homeowners and graduated from the program. Please see more information about the Homeownership Program on page 8. In FY 2018, 92 HCV families were participants in the FSS program. In FY 2019, PHA will assign an FSS Coordinator to be on-site one day each week in the Leased Housing Department to increase the number of HCV participant referrals to and engagement with the FSS Program.

9. Continue to address the education, economic, social services and healthcare needs of youth, adults, and the elderly and disabled populations through direct service, referrals and creative partnerships. The PHA will increase homeownership rates (PH, S8) and explore the Job Plus Pilot Program and opportunities for new digital literacy and youth programming.

Jobs Plus: PHA received a Jobs Plus grant in FY 2017. In FY 2018, PHA hired and trained staff, conducted outreach to the Manton Heights and Hartford Park developments, conducted 95 Jobs Plus events, and implemented programming. The following statistics highlight some of the results of Jobs Plus staff efforts in FY 2018: 267 residents had a Jobs Plus assessment; 263 residents met with a case manager; 213 residents were provided with a post-assessment service; 140 participants were provided with job search assistance; 40 residents began new part-time employment and 28 residents began new full-time employment; 44 workable residents connected with a Jobs Plus Community Coach; 27 residents enrolled in a training/certification program; and 18 residents enrolled in an employment readiness program.

As part of the PHA's strategy to build a "culture of work" within its family properties, it applies an inter-general approach that reaches parents and youth. In addition to efforts to foster workforce development and employment with adults, PHA partnered with the City's *One Providence Summer Youth Internship Employment Program* in the summer of 2018. PHA conducted outreach to youth and assistance to them in the application process for employment in a wide range of private sector and non-profit organizations in Providence. In addition, PHA was a site for 14 *One Providence* internships in which PHA youth were paired with staff to gain hands-on works skills four days each week, as well as one day each week learning the "soft" skills needed for employment in any work environment in specially designed workshops. PHA has received funding that will allow it to participate in *One Providence Summer Youth Internship Employment Program* in the summer of 2019.

The Jobs Plus grant award, in addition to bringing significant financial resources to increase resident employment at a living wage and self-sufficiency, has fostered new collaborations and partners investing in such programming for residents as youth programming and digital literacy.

Digital Literacy Classes: PHA and the Providence Public Library's RI Family Literacy Initiative collaborated, with funding provided by the Jobs Plus grant, to deliver a multi-week digital literacy basic skills training for residents. Participation in the

program was incentivized by the provision of a desk top computer, purchased with a grant from Santander Bank, to participants who completed the training. PHA and Providence Public Library also partnered with the United Way of Rhode Island, with funding from the Jobs Plus grant, to provide residents with a multi-week, basic skills digital literacy training. Participation in this program was incentivized by the provision of a laptop and Wi-Fi hotspot, purchased with a grant from the UWRO's Olneyville Fund, to residents who attended all sessions.

Youth Programming: In partnership with the City of Providence and a host of community employers, PHA participated in the City's new *One Providence Summer Youth Program* in the summer of 2018. This six-week program included work readiness skills development, career exploration, and paid internships at a variety of businesses, public agencies and non-profit organizations. PHA anticipates participating in the program in the summer of 2019. PHA partnered with the Providence Public Library to deliver the Teen Squad program designed to develop leadership, public speaking, and teamwork skills among youth residing in the Chad Brown development. Teens created and delivered well-received digital presentations that capped their participation in the program and were celebrated for their participation in a graduation ceremony attended by their families. PHA anticipates repeating this program in FY 2019. In collaboration with the YMCA of Providence, PHA provided youth residing in Coddling Court with the *Culinary Arts Academy*, an eight-week program designed to introduce them to careers in the culinary arts industry. The program included a meal prepared by youth and a graduation ceremony, attended by parents, which honored the youth for their participation. Parents praised the program and requested that PHA consider additional programs for youth in the development. During the current fiscal year, PHA has partnered with the North American Family Institute to complete two three-week sessions of the Youth Police Initiative and have brought 18 public housing youth participants together with Providence police officers for leadership development and story sharing exercises.

Financial Opportunity Center: The Financial Opportunity Center (FOC) continued to provide residents with a wide range of programming and support designed to help families realize their financial dreams through personalized coaching. Included in FOC programming is financial literacy, budgeting, credit repair, job application coaching, resume preparation assistance, training in interviewing techniques, and communication and interpersonal skills development. Participants in FOC programming continue to demonstrate: increased goal attainment; better employment readiness skills; improved money management skills; improved savings; lowered debt levels and improved credit scores; and increased financial confidence. As of 6/30/18, the FOC served a caseload of 136 families.

Success Closet: Often, PHA staff note that residents encounter a lack of appropriate work attire as an obstacle to employment. Resident Services staff, supported by donations of clothing, accessories, and toiletries from PHA staff, created the *Success Closet*. The *Success Closet* is a free boutique where residents, with assistance from Financial Opportunity Center and Jobs Plus staff, can select suitable clothing and related items necessary for making a positive first impression and securing employment. Staff provided residents who secure employment with referrals to additional sources of clothing required for employment.

Resident Opportunities and Self-Sufficiency Program (ROSS): ROSS resident service coordinators continue to engage in a wide array of activity designed to meet the needs of all residents, including assessing needs, connecting residents to community resources, developing and nurturing relationships with community partners, and fostering self-sufficiency and workforce development in family developments. In FY 2019, the new position of Direct Service Community Support Specialist has been established to provide services specifically to residents of elderly and disabled developments to prevent social isolation.

Family Self-Sufficiency Program. PHA provided public housing residents and HCV participants with the opportunity to improve family income and attain self-sufficiency through involvement in its long-standing Family Self-Sufficiency (FSS) program. In FY 2018, the program maintained a caseload of 184 families with 50% of participants being from the HCV program and 50% from public housing. In FY 2018, PHA distributed \$326,180 in FSS escrow funds to graduates of the program. PHA reviewed its FSS Action Plan in FY 2018; it will revise and implement an updated Plan in FY 2019.

Homeownership Program. PHA continued to provide residents and HCV participants with information, referrals, and coaching necessary to become homeowners. In FY 2018 seven families became homeowners, down from 12 in FY 2017. Four families were HCV program participants and the remaining three were public housing families. Prices for single family homes in

Providence continue to increase, making it more difficult for our participants to become homeowners. In addition to providing coaching and counseling to support families becoming homeowners, PHA continues to provide post purchase support to homeowners, including educational programs such as energy efficiency, debt management, and information about resources available to homeowners. PHA expects that five new program participants will become homeowners in FY 2019.

10. Continue to provide security and safety to residents by advocating for more housing unit officers, nourishing community relations, maintaining partnerships with federal, state and local law enforcement agencies, tracking and monitoring crime trends and seeking funding opportunities to support and enhance safety initiatives and methods.

In FY 2018, PHA conducted a needs assessment of its camera system (269 cameras) on the Milestone Camera System that is deployed across PHA. It was determined that several of the rooftop Bridgewave Wireless Radio Links equipment, which drives the Milestone System and part of the PHA's IT, needed to be replaced or updated as they are most at-risk of failing soon or had failed. Also, several of the camera recording servers and security cameras in several developments and elevators were found to need replacement; the SHA replaced this equipment using budgeted Capital Program grant funds. PHA has received two awards from the HUD Emergency Safety and Security Capital Program which between them covered all public housing developments; it is now ineligible to apply for an additional award. PHA continues to explore sources of funding from local, state, federal, and foundation sources that will allow it to maintain existing and expand security cameras in its portfolio.

There was an increase in opioid overdoses in Providence in FY 2018. To combat this trend, the Safety and Security Department brought training to Department staff, as well as staff from other departments, that was designed to raise awareness of the signs of overdose and how to administer Naloxone; total staff trained

64 to date. Each trainee received a kit containing two doses of Naloxone. Shortly after the completion of training, a security officer used his training to revive a resident who had overdosed on heroin. In FY 2019, the training will be offered to additional PHA staff, members of the Resident Advisory Board, and resident groups.

In FY 2018, the Security and Safety Department populated its database with additional fields, including fields that allow Department staff to more effectively track No Contact Orders, Protection Orders, and No Trespass Orders to promote the safety of residents and staff. This expanded database allows Security and Management staff to have the same information in the same format. The Safety Director, other key PHA staff, Housing Police Unit members, and Providence Police Department (PPD) supervisors closely review incident reports and PHA crime statistics to note trends and plan for effective, site-based safety measures and crime suppression, intervention and prevention strategies.

The PHA Security and Safety Department logged 263 reported crimes in FY 2018, compared to 210 in FY 2017. In FY 2018, 24% of reported crimes were Part 1 Crimes (category includes murder, rape, robbery, assault, B & E, larceny, and motor vehicle theft) and 76% were Part 2 Crimes (simple assault, stolen property, malicious mischief, weapons offenses, prostitution/vice, other sex offenses, narcotics, gambling, family and children, DUI, liquor violations, disorderly conduct, all other offenses); these percentages mirror last year's figures. It should be noted that there were no murders or rapes on PHA property in FY 2018; in FY 2017, there was one murder and two rapes reported. In FY 2018, 51% of the reported crimes were resolved with arrests. In addition to response to calls concerning crime, the Department responded to 1,873 calls for service in FY 2018; response to calls for service totaled 1,572 in FY 2017. Calls for service figures include safety checks, emergency situations, meeting attendance, and motor vehicle summonses and tags.

The Safety and Security Department welcomes the addition of a grant-funded Victims of Crime Act (VOCA) Community Support Coordinator in the Resident Services Department. PHA has been awarded a one year \$138,566 VOCA grant from the Rhode Island Department of Public Safety to establish a VOCA Community Safety Coordinator to provide direct services to persons affected by crime who reside in PHA developments or participate in the HCV program. The Coordinator will also develop heightened awareness among residents, program participants, and staff of the impact of crime and violence, as well as available prevention and intervention resources in the community. The Safety and Security Department, as well as members of other PHA Departments plan to meet with the Coordinator daily to share information to ensure that she has the information necessary to be

aware of a victim of a crime and to effectively liaise with other PHA Departments, the Providence Police Department, the court system, and appropriate agencies to support the victim and assist in promoting his/her safety. At the end of this first year of funding we will be eligible to apply for renewal funding for two years at a time.

The Youth and Police Initiative (YPI), coordinated by the Resident Services Department and in its tenth year of operation in FY 2018, continued to build positive relationships between youth and police and expose youth to careers in law enforcement. This year, PHA conducted two YPI training programs at the Coddling Court and Scattered Site developments, one all male and one coed. Following these trainings, Providence Police and the PHA's Security Department reported an increase in positive interactions with youth and families, as well as parents expressing thanks for the program, requesting assistance in addressing issues with children, and reporting information about safety and crime concerns that enabled law enforcement and staff to act to protect the community. PHA anticipates conducting two sessions in the coming year.

The Safety and Security Department will incorporate two new components into its safety and security strategy in the coming year. PHA will collaborate with the Providence Police Department to develop and deliver a best-practices in policing public housing communities seminar for police academy cadets to both introduce cadets to best practices and dispel myths and stereotypes about public housing residents. PHA will also partner with the Providence Police Department to develop a Police Explorer Program as a follow-up for older youth who participate in the existing Youth and Police Initiative. The program will follow the Law Enforcement Explorer Program that provides career orientation and experience for youth contemplating a career in the field of criminal justice. The program will serve both males and females, ages 14 – 21 and will provide a personal awareness of the criminal justice system through training, practical experiences, and other activities. The program will have a focus on leadership development and fostering trusting relationships between youth and police officers and police and the community.

11. Continue to ensure adherence of legal risk management, safety and insurance best practices as well as maintain the PHA Safety Committee to promote policies to make the PHA a safe and healthy place to live and work.

In FY 2018, PHA assigned one staff member to serve as the PHA's point person for risk management. In FY 2018 a database was created that contains all claims of injury and loss filed by residents, guests and visitors to PHA properties, including the resolution of claims, for a ten-year period. This database serves to identify trends and conditions contributing to injury or loss claims, as well as trends in resolving claims. This year the PHA will review the agency's process for reporting, documenting, and responding to injury and/or loss claims filed by residents, guests and visitors to PHA properties and revise procedures and forms utilized for documenting and responding to claims, along with training for staff to implement any new forms or procedures.

The PHA Safety Committee, an interdepartmental group of employees led by the Director of Security continued to meet bi-monthly to review safety information, plan training activity, and develop programming. The Committee conducted safety inspections of grounds and common areas of developments to note any safety issues which require correction.

In FY 2018, all maintenance staff participated in a two-hour, required OSHA safety training. In addition, all foremen participated in a two-day, 10-hour OSHA general safety training that enabled them to apply enhanced safety measures in their assigned properties; the PHA's risk management point person also participated in this training. PHA continued to utilize its maintenance training facility and partnered with Beacon Mutual Insurance, its worker's compensation insurance carrier to provide safety training sessions for facilities maintenance staff.

In FY 2019, PHA and its partners will begin developing emergency preparedness plans for family developments. PHA also partnered with PFD in FY 2018 to bring an interactive fire safety and prevention training sessions to all elderly developments. In FY 2019, PHA and the PFD will develop fire safety and prevention training for family developments.

12. Continue to maintain and improve finance procedures to assure regulatory compliance, refine reporting systems (based on the most recent audit review), advance department cross training and improve the newly acquired payroll system.

In FY 2018, the PHA Finance Department received training about developing Administrative Standard Operating Procedures (SOP) manuals. These SOP manuals will be specific to each job description within the Finance and Procurement Department. The first step in developing the Department SOP Manual, conducting an inventory of Departmental tasks by job, has been completed. In the next year, the Department will work to complete a draft of the SOP Manual for all finance positions. In 2018, the Finance Department continued to conduct cross-training of staff to ensure coverage of key functions in the event of staffing changes. The department recently experienced the retirement of its Procurement Officer and anticipates another retirement. In preparation for these staffing changes, the Department will re-assess departmental assignment of duties and determine future staffing needs and patterns. In terms of improving inventory control, the Department is considering consolidating the storage of appliances and other high value items from storage at local PHA sites to the central warehouse and implementing a small tool inventory system to improve the tracking of tools. PHA transitioned to a new payroll system in FY 2018, which has resulted in a more user-friendly tool for the Department and PHA staff in general. In FY 2018, PHA issued RFPs and awarded contracts for audit services, actuary services (OPEB calculation) and defined contribution plan. In the coming year, the will issue an RFP and award a contract for banking services.

13. Continue to maintain, reorganize and improve the general infrastructure of the organization and ensure compliance with Section 3 requirements.

General Infrastructure: In FY 2018, PHA continued to assess its organizational structure and adjust in the assignment of functions to improve efficiency and effectiveness. In FY 2018, PHA's Finance Department conducted an inventory of departmental tasks, examined the assignment of duties, cross-trained staff and began the process of developing a departmental standard operating procedures manual for completion in FY 2019. PHA also revised its procurement policy and transferred supervision of procurement activities from the Facilities Maintenance Department to the Finance Department. After examining the needs of the PHA, the Special Projects Office was transformed into the Office of Strategy and Development that supports policy and program evaluation, program and policy development, establishes and fosters partnerships within the PHA and in the community, and secures new funding for PHA initiatives. In its Property Management and Leased Housing Departments, staff teams worked with a consultant to review and make recommendations for revising the ACOP for public housing, the Administrative Plan for the HCV program, and the Action Plan for the FSS program. In the Property Management Department, PHA streamlined forms used across various AMP offices to ensure consistency in procedures and clarity in communication. The Security and Public Safety Department populated its database to better track data and share information across departmental lines. In the Facilities Management Department, staff was provided with ongoing training opportunities that promoted efficiency and safety and the Department developed a specialized Vacancy Reduction Task Force to improve unit turn-around time. In FY 2018, PHA restructured the leadership of the Resident Services Department after the retirement of the Department's long-term Director by replacing the position with two Associate Directors. In this model, each Associate Director has a portfolio of programs and staff for which she has primary supervisory responsibility; both Associate Directors work as a team to ensure linkages between Department programming and to the overall mission of the PHA. During this time of transition, Department staff received two important Nan McKay trainings: one was a Family Self-Sufficiency (FSS) training; the other was a case management training. Both training events increased knowledge of best practices that will be applied to standardizing practices for specific programs, as well as for the Department as a whole. For example, a common intake form was developed for the Department that aligned with HUD and other funder requirements. Staff also worked with a consultant from Nan McKay to draft a revised FSS Action Plan; the revised plan will be brought to the PHA Board of Commissioners for approval in FY 2019.

The PHA's IT Department implemented several upgrades to equipment and systems in FY 2018 to ensure staff has the necessary tools and technology necessary for effectiveness and efficiency; the Department will implement an upgrade of the agency's software system this year. One of the most important efforts in maintaining, reorganizing, and improving the general infrastructure at PHA has been an effort to reinforce an appreciation for the shared responsibility of all staff for providing high quality public housing and programs for the community we serve. In the past year, PHA established an inter-departmental project, the *Walk-through Initiative*, in which staff teams, including line staff and managers from different departments, walk properties on a regular basis to view site conditions, interact with residents, and provide a management presence in our housing communities. This Initiative has fostered new understanding among Departments of the critical role each plays in the important

work of the PHA and has served to strengthen a sense of unity of mission in accomplishing the goals and objectives of our Annual Plan.

Section 3 Goals: In FY 2018, PHA exceeded its Section 3 Goal of 30% of new hires being Section 3 hires. Of the 42 new hires in the fiscal year, 14 or 33% of new hires were Section 3 hires. In the coming year, PHA will continue to raise resident awareness of employment opportunities by posting all job vacancies on resident bulletin boards, distributing job vacancy information to Resident Advisory Board members, coordinating with the Resident Services Department and the Job Plus Program, and by participating in job fairs geared toward Section 3 eligible persons. In addition to meeting Section 3 goals concerning new hires, the PHA met its goal of having 10% of all contractors being Section 3 contractors. In FYs 2019-2020, PHA will pursue new initiatives designed to assist in maintaining Section 3 participation at or above the required percentage of contracting opportunities: 1). Design and deliver an outreach workshop that will acquaint Section 3 vendors and contractors with public procurement process and requirements involving PHA invitations for quotes, bids, and requests for proposals for goods and services; 2). Update an existing database that identified residents who have an interest in specific training programs, as a means of guiding the development of training programs that would produce qualified resident candidates for Section 3 employment opportunities; 3). Explore an initiative in which the PHA would gather information for a database that would identify tenants with skills who are interested in being hired by PHA contractors so that the PHA may provide contractors with access to potentially qualified Section 3 residents; and 4). Explore language for insertion in PHA procurement documents that requires contractors to engage in more defined activities designed to yield and develop more qualified Section 3 hires.

14. Continue (1) to ensure that the PHA computer hardware, software and network are updated and upgraded to maximize operational efficiency, (2) maintain a secure digital environment and (3) provide support and technological tools to employees and residents of the PHA.

The Resident Services GED & ESL Teachers' computers along with 17 Facilities Maintenance (FM) Department computers were replaced in FY 2018 with new Dell OptiPlex 7450 AIO (All-In-One) computers. Since IT technology changes so quickly, our goal (if possible) is not to have any staff computers older than 4 years. Due to the age of the computers, three computers that use the Milestone (Cameras) and Andover (HVAC and Card Access) software were replaced in October with new Dell Precision 3630 computers. Also, in FY 2018, two computers located in the Security Office and the remaining computer located in the FM Dispatch office were replaced. In the fall of 2017 MRI Software purchased three Public Housing software vendors, HAB Inc., Tenmast and HAPPY; the PHA was a customer of HAB's - Encompass software. In FY 2018, the PHA decided to upgrade its existing operational software system to MRI software. MRI Software will bring together the best of these software packages, creating a web-enabled platform that will address the needs of PHA. In FY 2019, the PHA's operating software will be upgraded to MRI software, with anticipated improvements in PHA software functionality and operational efficiency. PHA has upgraded its Microsoft Office products to Office 365 as of early 2019. During the Office 365 upgrade project, user's external email has been moved from Cox Communication to the Office 365 cloud. Also included in the Office 365 upgrade project, PHA has changed our Domain to provhousing.org, and change external emails to first letter of first name and full last name. Our Network Backup will be upgraded in FY 2019 and the EMC 2200 Data Domain installed in the Dexter Data Center will be upgraded to an EMC 6300 Data Domain with 32 TB of hard drive space. A Data Domain with the same specifications will also be installed at the Hartford Data Center. The software will be configured so each Data Domain will automatically synchronize the data being backed up to the other Data Center, resulting in off-site backups. Due to instability with our Wireless Network during inclement weather, PHA will be installing Verizon as a backup. Once installed should our Wireless Network fail, for whatever reason, the Verizon backup will take over and staff will have access to all resources apart from cameras that are not installed at that location.

11.12 The PHA's Deconcentration Policy

It is PHA's policy to provide for the deconcentration of poverty and to encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. The PHA may skip families on the waiting list to reach other families with a lower or higher income. This will be done in a uniform and non-discriminating manner.

The PHA will affirmatively market its housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, the PHA will analyze the income levels of families residing in each of its developments, the income levels of census tracts in which each development is located, and the income levels of the families on the waiting list. Based on this analysis, the PHA will determine the level of marketing strategies and deconcentration incentives to implement.

11.13 Deconcentration Incentives

The PHA may offer one or more incentives to encourage applicant families whose income classification would help meet the deconcentration goals of a particular development.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

11.14 Targeting

Per the QHWRRA, in each fiscal year the PHA will reserve at least 40 percent of its new admissions for families who have incomes that do not exceed 30 percent of area median income as published by HUD.

The PHA will follow the statutory requirement that at least 40 percent of newly admitted families in any fiscal year be families whose annual income is at or below 30 percent of the area median income. To ensure that this requirement is met, the PHA will quarterly monitor the incomes of newly admitted families and the incomes of families on the waiting list. If it appears that the requirement to house extremely low-income families will not be met, the PHA will skip higher income families on the waiting list to reach extremely low-income families.

If there are not enough extremely low-income families on the waiting list, the PHA will consider outreach on a non-discriminatory basis to attract extremely low-income families to reach the statutory requirement.

Providence Housing Authority
Property Management Department
 100 Broad Street
 Providence, RI 02903
 (401) 709-1300

Number of Family Members	Extremely Low	Very Low	Low
1	\$16,900	\$28,150	\$45,000
2	\$19,300	\$32,150	\$51,400
3	\$21,700	\$36,150	\$57,850
4	\$25,100	\$40,150	\$64,250
5	\$29,420	\$43,400	\$69,400
6	\$33,740	\$46,600	\$74,550
7	\$38,060	\$49,800	\$79,700
8	\$42,380	\$53,000	\$84,850

INCOME LIMITS EFFECTIVE APRIL 1, 2018
FY 2018 MFI: \$80,600

- ❖ Extremely Low = very low-income families whose income do not exceed the higher of the Federal poverty level or 30% of Area Median Income
- ❖ Very Low < 50% of median income
- ❖ Low < 80% of median income

Average Income by Development

(Project Total Income divided by Occupied Units= Average Income per Development)

Project	Total Income	# Occupied Units	Dev. Average Income
0001 (Chad)	\$2,284,884.00	197	\$11,598.00
0001 (Ad)	\$2,169,161.00	153	\$14,178.00
0002 (Roger Williams)	\$564,167.00	40	\$14,104.00
0002 (Coddington court)	\$1,621,473.00	118	\$13,741.00
0003 (Hartford Park)*	\$6,062,996.00	500	\$12,126.00
0004 (Manton Heights)	\$3,513,632.00	328	\$10,712.00
Total	\$16,216,313.00	1336	\$12,138.00

* All Elderly/Disabled Developments should be excluded but Hartford Park Tower is part of AMP 0004 therefore, the data is all-inclusive.

Deconcentration Policy

Total Income of all Covered Developments ÷ Number of Occupied Units = Development Wide Average Income (DWAI)

Established Income Range (EIR) = 85% DWAI – 115% DWAI

PHA Covered Developments

- 0001** Chad Brown
Admiral Terrace
- 0002** Roger Williams
Coddling Court
- 0003** Hartford Park
- 0004** Manton Heights

FY18

Total Income \$16,216,313.00
Occupied Households 1336
DWAI \$12,138.00

EIR = \$10,317-\$13,959

All AMPS are within the Established Income Range with the exception of Admiral Terrace and Roger Williams; both sites exceed the EIR by < 2%. Efforts will be made to send lower income families to these 2 sites during the upcoming leasing process.

All Elderly/Disabled Developments and Scattered Sites are excluded.

Attachment C.3
Resident Advisory Board Comments on the FY 2019 Annual Plan

On February 20, 2019, PHA provided the Resident Advisory Board (RAB) with a presentation about its draft FY 2019 Annual Plan. Contained in the Annual Plan was a proposal to establish an income limit in accordance with HOTMA. The PHA's proposed policy was presented as: "After a family's income has exceeded 120% of Area Median Income (AMI) for two consecutive years, the PHA will terminate the family's tenancy within six months of the determination. This proposed policy does not apply to a family that has a valid contract of participation in the Family Self-Sufficiency (FSS) program or a family currently receiving the Earned Income Disallowance." Staff explained that PHA developed this policy after having determined that: 1) The PHA currently had no residents at 120% of AMI and very few residents had incomes at or above 80% of AMI; 2) The vast majority of applicants on the waiting list had incomes at the very low or extremely low income level; and (3) Extremely low or very low-income applicants on the waiting list would wait a number of years on the waiting list for units to become available for them.

RAB members expressed concerns about how the PHA proposal to establish income limits in accordance with HOTMA could negatively impact existing PHA tenants. Among the potential impacts RAB members noted were: 1) Income limits that required a family to move out of PHA could discourage families from working; 2) Income limits that required a family to move out of PHA could be seen as a punishment for improving themselves economically; 3) Families, although earning income above 120% of AMI, might not have the self-sufficiency skills to be able to survive in market rate housing and could become homeless; and 4) If the family experienced a loss of a job after moving out of public housing, they would not have the benefit of rent being based upon income and their housing in the private market could be in jeopardy. RAB members noted that residents might be at the 120% of AMI income level, but if they haven't received training on how to budget and handle such things as paying their own electricity and gas bills when they may never have had that experience as public housing residents, may fail. They also noted that homeownership has many unfamiliar responsibilities, such as paying for water and sewer, insurance, taxes and upkeep of a house. RAB members noted that it could be very difficult for residents to adjust to living in the private market after many years living in public housing, particularly if they have not received education about financial literacy and budgeting.

PHA staff explained that the PHA will provide residents who are nearing or who have reached 120% of AMI with information and education that will help them to do well in the private market. Staff explained that the policy would include PHA carefully tracking families whose income is nearing or at the 120% of AMI and that notification to the family of being subject to the over-income policy after the first recertification at this level would also include automatic referral to the PHA's Financial Opportunity Center, Homeownership Program, and other appropriate partner agency programs to assist the family in planning for economic self-sufficiency and graduating successfully from the public housing program. RAB members emphasized that it will be critical for the PHA to make referral to programs at the earliest point when a family is identified as subject to the policy and for the PHA to follow up on referrals to encourage families to engage in self-sufficiency programs that will result in successful transition out of public housing.

In considering the RAB's comments, PHA carefully considered balancing the needs of resident families whose incomes are at 120% of AMI for two consecutive years and those of applicants on the PHA's waiting lists. Applicants on the waiting list must wait many years for units to become available, with the vast majority of those families having incomes below 50% of AMI and most having incomes less than 30% of AMI. PHA believes that as an agency charged with housing low income people, it must make units available to families who are the most economically disadvantaged. However, in adopting a policy that requires families over 120% of AMI for two consecutive years to move out of public housing, PHA commits to encouraging families throughout their tenancies to take advantage of self-sufficiency programming and to making a formal referral to educational programs about financial literacy, budgeting, renting units in the private market, and homeownership to equip transitioning residents with the knowledge and tools for success outside of public housing.

RAB members also commented that they appreciated PHA's work to obtain a Victims of Crime Act grant that funds the addition of a Community Safety Coordinator to the PHA's safety and security strategy. RAB members also expressed appreciation at the scale of work occurring as part of the agency's Capital Fund five year plan, in particular noting the importance of elevator modernization and sprinkler installation projects.

FY 2019

RESIDENT ADVISORY BOARD MEETING #5

WEDNESDAY, FEBRUARY 20, 2019

PHA Board Room @ 10:30AM

SIGN-IN SHEET



NAME	RESIDENT ASSOCIATION	EMAIL	PHONE
Vest maeingo	Sexton managers		cell 470-6079
Diana Zeeman	Kilmartin Plaza		401-450-8881
Stanley Moten	Sunset Village		401-677-9180
Amelie [unclear]	Morton		401-481-2884
Cheryl Tandream			
Vivian Medina	Hanford	APRA205@comcast.net	401-421-2101
Ingrid Bentsen	Carroll Towers		401-383-7527
Laura [unclear]	Carroll Towers		401-248-4394
Rebecca Wills	Dexter Manor		401-332-3010
M. Sanzato	PHA ED		401-761-1133

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)	U. S Department of Housing and Urban Development
	Office of Public and Indian Housing
	OMB No.2577-0226
	Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
 Consistency with the Consolidated Plan or State Consolidated Plan**

I, Emily Freedman, the Director of the Division of Community Development
Official's Name *Official's Title*
 certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

City of Providence Housing Authority
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
 Impediments (AI) to Fair Housing Choice of the

City of Providence, Rhode Island
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
 Consolidated Plan and the AI.
Continuing to update the ACOP for Public Housing and the Administrative Plan for the Housing Choice
 Voucher program ensures that programs are operated in compliance with applicable law and regulations.
 The Capital Fund Plan and Annual Statement demonstrate a sound plan for preserving decent, safe and
 sanitary housing for low-income families. The PHA's continued collaboration with City and community
 organizations, and successful pursuit of grant funds, results in a residents having access to a wide range of
 supportive programs. The PHA's pilot program of project-basing units will increase access of Housing
 Choice Voucher program participants to live in neighborhoods of opportunity.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official Emily Freedman	Title Director of the Division of Community Develop
Signature 	Date 3/4/2019

**Certifications of Compliance with
PHA Plans and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including
Required Civil Rights Certifications**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or ^x Annual PHA Plan for the PHA fiscal year beginning 7/1/2019, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

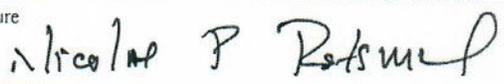
Housing Authority of the City of Providence, RI
PHA Name

RI001
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2019

5-Year PHA Plan for Fiscal Years 20 - 20

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012, 31 U.S.C. 3729, 3802)

Name of Authorized Official Nicolas Retsinas	Title Chair, Board of Commissioners
Signature 	Date 4/11/19