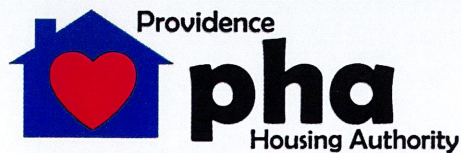




PROVIDENCE HOUSING AUTHORITY

ANNUAL PLAN

REVISIONS
TO THE
ANNUAL PLAN



100 Broad Street
Providence, RI 02903

2026



Administrative Offices
100 Broad Street
Providence, RI 02903

REVISIONS TO THE ANNUAL PLAN

1. Adoption of a RAD Amendment to the Annual Plan, including a revision to the PHA's definition of significant amendment to an Annual Plan.
2. Extension of the PHA's previously adopted admissions preference in the Public Housing Program for HCV participants who will lose a voucher due to the ending of HUD's Emergency Housing Choice Voucher (HCV) Program; the admissions preference is extended from an ending date June 30, 2026 to December 31, 2026.
3. Revision of the Public Housing Admissions and Continued Occupancy Policy to reflect mandatory changes required by Executive Orders, HUD PIH Notices, and letters issued from HUD.
4. Revision of the Housing Choice Voucher Program (Section 8) Administrative Plan to reflect mandatory changes required by Executive Orders, HUD PIH Notices, and letters issued from HUD.



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**RAD AMENDMENT AND REVISION OF THE DEFINITION OF A
SIGNIFICANT AMENDMENT TO AN ANNUAL PLAN**

Attachment — Rental Assistance Demonstration (RAD)

Providence Housing Authority (the “Authority”) will be converting the public housing developments listed below to a Section 8 Housing Assistance Payment (HAP) contract through the Rental Assistance Demonstration (RAD) under the guidelines of H 2019-09/PIH 2019-23, REV-4, as revised (the “RAD Notice”). RAD was designed by HUD to assist in addressing the capital needs of public housing by providing properties with a stable income stream and access, if needed, to new sources of capital to repair and preserve its affordable housing assets. As part of this conversion, the Authority may also seek HUD approval for a Disposition for a portion of the project under Section 18 of the U.S. Housing Act of 1937 (the Act), though such application will not impact resident rights or the units that will be preserved under a HAP contract

Below, please find specific information related to the Public Housing Development(s) proposed for RAD. Elements of this proposal or subject to change as plans develop, in consultation with residents:

Proposed Conversion of Dexter Manor I and Dexter Manor II (AMP 05)

Development Name and Development Number(s) per PIC:	Dexter Manor RI001000005	
Conversion Type:	<input type="checkbox"/> Project Based Voucher (PBV) <input checked="" type="checkbox"/> Project Based Rental Assistance (PBRA)	
Estimated Conversion Date (month and year) (i.e., disposition timeline for a RAD/Section 18 Blend)	March 2027	
Current project designation:	<input type="checkbox"/> Family <input checked="" type="checkbox"/> Elderly/Disabled <input type="checkbox"/> Elderly-Only	
Is the project anticipated to have waiting list preferences after conversion:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<i>If yes, please describe</i>
Will the conversion involve a transfer of the assistance to a new location?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<i>If yes, please describe:</i> 1) <i>put the location if known, and # of units transferring</i> 2) <i>What the PHA plans to do with the original site following the transfer of assistance</i>
Estimated amount of Capital Funds to be used in the RAD Conversion (subject to future change)	\$250,000	
After conversion, the annual Capital Fund grant is estimated to be reduced by:	\$973,894 (based on the 2026 Capital Fund award).	
We certify that the site complies with all applicable site selection requirements set forth at - 24 CFR § 983.55, for PBV conversions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

<p>- Appendix III of the RAD Notice, for conversion to PBRA</p> <p>Further, the site complies with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act</p>			
<p>Is the Authority currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling?</p>		<p><input type="checkbox"/> Yes, <i>and</i> compliance will not be negatively impacted by conversion activities.</p> <p><input checked="" type="checkbox"/> No</p>	
<p>Will the RAD conversion impact an existing Capital Fund Financing Program or Energy Performance Contract?</p>		<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p><i>PHA intends to pay down (as part of the conversion financing) Dexter Manor's proportional share the CFFP and EPC.</i></p>
<p>Is the PHA an Moving to Work agency and augmenting the RAD rents using voucher reserves as described in Section 1.6 or 1.7 of the RAD Notice</p>		<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><i>If yes, please include a statement explaining how the PHA will be able to maintain continued service level requirements.</i></p>
<i>Bedroom Type</i>	<i>Number of Units Pre-Conversion</i>	<i>Estimated Number of Units Post-Conversion</i>	<i>Change</i>
Studio/Efficiency	120	120	0
One Bedroom	144	144	0
Two Bedroom	27	27	0
Three Bedroom			
Four Bedroom			
Five Bedroom			
Six Bedroom			

Resident Rights, Participation, Waiting List and Grievance Procedures

Upon conversion to the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in H-2016-17/PIH-2016-17 (RAD Civil Rights and Relocation Notice and:

- For conversions to PBV: Section 1.6 of the RAD notice
- For conversions to PBRA: Section 1.7 of the RAD Notice

Below, please find a table listing out each of the provisions affecting residents' rights and participation, waiting list and grievance procedures. The table lists out the provisions applicable to the type of conversion (PBV or PBRA) that the PHA is proposing, with reference to the Notice provisions that provide each tenant protections.

Tenant Right	Reference for Conversion to PBV	Reference for Conversion to PBRA
<i>Tenant Protections Under the RAD Civil Rights and Relocation Notice (H 2016-17; PIH 2016-17)</i>		
Resident Right to Return	Section 6.2	
Relocation Rights	Section 6.3-6.11	
<i>Tenant Protections Under the RAD Notice (H 2019-09/PIH 2019-23, REV-4, as revised)</i>		
No rescreening of tenants upon conversion	Section 1.6.C.1	Section 1.7.B.1
Establishment of Waiting List	Section 1.6.D.4	Section 1.7.C.3
Phase-in of tenant rent increase	Section 1.6.C.3	Section 1.7.B.3
Resident Participation and Funding	Section 1.6.C.5	Section 1.7.B.5
Family Self Sufficiency (FSS)	Section 1.6.C.4	Section 1.7.B.4
Resident Opportunity and Self Sufficiency Service Coordinators (ROSS-SC)	Section 1.5.G	Section 1.5.G
Jobs Plus	Section 1.6.C.8	Section 1.7.B.8
Earned Income Disregard	Section 1.6.C.7	Section 1.7.B.7
Choice-Mobility	Section 1.6.D.8	Section 1.7.C.5
When Total Tenant Payment Exceeds Gross Rent	Section 1.6.C.9	Section 1.7.B.9
Under-Occupied Unit	Section 1.6.C.10	Section 1.7.B.10
Termination notification	Section 1.6.C.6	Section 1.7.B.6
Grievance process	Section 1.6.C.6	Section 1.7.B.6

Significant Amendment Definition

As part of the Rental Assistance Demonstration (RAD), Providence Housing Authority is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the number of each bedroom-type placed under HAP contract after conversion
- d. If the conversion involved a transfer of assistance to a new location, changes to the location of the new site and plans for the original site following the transfer
- e. Whether the project will adopt preferences after conversion
- f. Whether the RAD conversion also involves a related Section 18 Disposition application, as long as such inclusion does not impact the number of units placed under HAP contract or the rights of impacted residents



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REVISIONS TO THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY

MANDATORY REVISIONS TO THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP)

Introduction

- Revised to account for most recent HOTMA guidance.

Chapter 2

- Revised equal access language to account for Executive Order 14168. ("Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government")
- Revised policy language on serving limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25. (Executive Order 14224 of March 1, 2025. Designating English as the Official Language of the United States.)

Chapter 3

- Contains clarifications on citizenship or eligible immigration status in accordance with HUD Secretary Letter 12/16/25. (EIV-SAVE Tenant Matching Report, cross references Inventory Management System/PIH Information Center (IMS/PIC) data with U.S. Citizenship and Immigration Services (USCIS) Systematic Alien Verification for Entitlements (SAVE) data)
- Contains clarifications on compliance of consent to release of information per Notice PIH 2024-38. (Housing Opportunity Through Modernization Act (HOTMA) Sections 102 and 104: Updated Guidance to Public Housing Agencies (PHAs) on Compliance)
- Revised to account for updated HUD guidance on use of arrest records set forth in Notice PIH 2025-26. (Rescission of Joint Notice PIH 2015-19 / H 2015-10, Guidance on the Use of Arrest Records in Housing Decisions)

Chapter 4

- Revised policy language on limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25. (Executive Order 14224—Designating English as the Official Language of the United States. The July 14, 2025, Office of the Attorney General (OAG) Memo, alongside Executive Order 14224, rescinded all prior federal guidance regarding tailored translation services for Limited English Proficient (LEP) individuals.)
- The admissions preference for families impacted by the sunset of the Emergency Housing Voucher (EHV) Program is extended to 12/31/26.

Chapter 6

Chapter 6.A. includes the following changes:

- Removal of policy language regarding the Earned Income Disallowance, as this has now fully

sunset.

- Various policy clarifications on the treatment of income based on answers received from Hotmaquestions@hud.gov.

Chapter 6.B includes the following changes:

- Removal of policy language regarding the Earned Income Disallowance, as this has now fully

sunset.

- Updates for inflationary adjustments.

Chapter 7

Chapter 7.A. includes the following changes:

- Policy clarifications on the treatment of income based on answers received from Hotmaquestions@hud.gov
- Modifications to the section on streamlined income determinations.
- Clarifications on citizenship or eligible immigration status in accordance with HUD Secretary Letter 12/16/25. (Reminded PHAs of legal obligations under Section 214 of the Housing and Community Development Act of 1980 (Section 214) and President Trump's Executive Order 14218, Ending Taxpayer Subsidization of Open Borders, to verify the citizenship and immigration status of all individuals prior to admission to the Public Housing or Housing Choice Voucher programs.)
- Clarified language to reflect updated VAWA forms.

Chapter 7.B includes the following changes:

- Policy clarifications on the treatment of income based on answers received from Hotmaquestions@hud.gov
- Updates for inflationary adjustments.
- Clarifications on citizenship or eligible immigration status in accordance with HUD Secretary Letter 12/16/25

Chapter 9

Both A and B chapters contain:

- Policy clarifications based on answers received from Hotmaquestions@hud.gov.
- Removal of language on the Earned Income Disallowance, as this has now fully sunset.

9B only has had the last two sections reorganized for better subject flow with no substantive changes.

Chapter 10

- This chapter contains edits to reflect the rescinding of notice FHEO 2020-01. (Sometimes referred to as the "Assistance Animals Notice.") T

Chapter 11

- This chapter contains only minor modifications for clarity.

Chapter 12

- Clarified language to reflect updated VAWA forms.

Chapter 13

- Contains clarifications on compliance of consent to release of information per Notice PIH 2024-38. (Housing Opportunity Through Modernization Act (HOTMA) Sections 102 and 104: Updated Guidance to Public Housing Agencies (PHAs) on Compliance)
- Revised to account for updated HUD guidance on use of arrest records set forth in Notice PIH 2025-26. (Rescission of Joint Notice PIH 2015-19 / H 2015-10, Guidance on the Use of Arrest Records in Housing Decisions)

Chapter 14

- Revised policy language on limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25. (Executive Order 14224—Designating English as the Official Language of the United States. The July 14, 2025, Office of the Attorney General (OAG) Memo, alongside Executive Order 14224, rescinded all prior federal guidance regarding tailored translation services for Limited English Proficient (LEP) individuals.)

Chapter 15

- Revised amount of federal awards required to have an independent audit.

Chapter 16

- Matched policy language on repayment of debts to Model Admin Plan.
- Clarified language to reflect updated VAWA forms and included sample versions of new forms.

Glossary

- Revised definitions to reflect updated VAWA forms.

Appendix

- Revised appendix to update intro and remove policies incorporated prior to the HOTMA full compliance date



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**REVISIONS TO THE ADMINSTRATIVE PLAN FOR THE HOUSING CHOICE
VOUCHER PROGRAM**

MANDATORY REVISIONS TO THE PHA ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM

Introduction

- Revised to account for most recent HOTMA guidance and updated NSPIRE compliance date.

Chapter 1

- Contains clarifications for the HOTMA Voucher Final Rule, particularly as relevant to the contents of the plan.

Chapter 2

- Revised equal access language to account for Executive Order 14168.
- Revised policy language on serving limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.

Chapter 3

- Contains clarifications on compliance of consent to release of information per Notice PIH 2024-38.
- Revised to account for updated HUD guidance on use of arrest records set forth in Notice PIH 2025-26.

Chapter 4

- Revised policy language on limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.

Chapter 5

- Revised language on limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.
- Clarified language to reflect updated VAWA forms.

Chapter 6

Chapter 6.A. includes the following changes:

- Removal of policy language regarding the Earned Income Disallowance, as this has now fully ended.
- Various policy clarifications on the treatment of income based on answers received from Hotmaquestions@hud.gov.
- Revised language on treatment of student financial assistance as it was removed from 2026 HUD appropriations.
- Chapter 6.B includes the following changes:
- Removal of policy language regarding the Earned Income Disallowance, as this has now fully ended.

- Updates for inflationary adjustments.

Chapter 7

Chapter 7.A. includes the following changes:

- Policy clarifications on the treatment of income based on answers received from Hotmaquestions@hud.gov.
- Addition of a section on streamlined income determinations.
- Clarifications on citizenship or eligible immigration status in accordance with HUD Secretary Letter 12/16/25.
- Clarified language to reflect updated VAWA forms

Chapter 7.B includes the following changes:

- Policy clarifications on the treatment of income based on answers received from Hotmaquestions@hud.gov.
- Updates for inflationary adjustments.
- Clarifications on citizenship or eligible immigration status in accordance with HUD Secretary Letter 12/16/25.
- Clarified language to reflect updated VAWA forms.¹¹

Chapter 8

Chapter 8.A includes the following changes:

- Updated NSPIRE compliance date.
- Revised section on NSPIRE standards applicable to HQS to account for requirements in Notice PIH 2024-26, REV-1 (extended the National Standards for the Physical Inspection of Real Estate (NSPIRE) compliance date to October 1, 2025, for Housing Choice Vouchers (HCVs) and Project-Based Vouchers (PBVs).
- Revised additional content to bring policies current to HAP contracts executed or renewed June 6, 2024 or later.

Chapter 8.B includes the following changes:

- Updated NSPIRE compliance date.
- Updated citations related to life-threatening deficiencies.
- Revised additional content to bring policies current to HAP contracts executed or renewed June 6, 2024 or later.

Chapter 9

- Added section on PHA Leasing Assistance for Families in accordance with Notice PIH 2022-18 (Use of Housing Choice Voucher (HCV) and Mainstream Voucher Administrative Fees for Other Expenses to Assist Families to Lease Units).

Chapter 10

- This chapter contains only minor updates to bring the content current.

Chapter 11

- Both A and B chapters contain:
- Policy clarifications based on answers received from Hotmaquestions@hud.gov.

- Revised policy language on limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.
- 11B only has had the last two sections reorganized for better subject flow with no substantive changes.

Chapter 12

- Contains clarifications on compliance of consent to release of information per Notice PIH 2024-38.
- Revised to account for updated HUD guidance on use of arrest records set forth in Notice PIH 2025-26.

Chapter 13

- Added section on owner incentive/retention payments in accordance with Notice PIH 2022-18.

Chapter 14

- Revised amount of federal awards required to have an independent audit.

Chapter 15

- Added section on use of exception payment standards in line with Notice PIH 2025-12.12

Chapter 16

- Clarified reasonable accommodation language in line with Notice PIH 2025-12.
- Revised language on language assistance in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.
- Clarified record retention language on equal access to account for Executive Order 14168.
- Revised language on medical and disability records citing Notice PIH 2010-26.
- Clarified language to reflect updated VAWA forms and included sample versions of new forms.

Chapter 17

- Revised language on language assistance in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.

Chapter 18

- Multiple sections of this chapter have been revised to align with Notice PIH 2019-23, REV-4 (Rental Assistance Demonstration – Final Implementation, Revision 4).
- Updated language in accordance with the 2/26/25 interim final rule rescinding the 30-day notice of nonpayment of rent.

Chapter 19

- Updated FUP and FYI sections to bring current with Notice PIH 2025-08.
- Revised language regarding limited English proficient persons and language assistance in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.

Glossary

- Revised definitions to reflect updated VAWA forms.

Appendix

- Revised appendix to remove policies incorporated prior to the HOTMA full compliance date.

Temporary Policy Supplement for Emergency Housing Vouchers (EHVs)

- Revised TPS for EHVs with updated information contained in Notices PIH 2025-07 and PIH 2025-19.