

2025

DRAFT

# REVISED ANNUAL PLAN

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PROVIDENCE  
HOUSING  
AUTHORITY



100 BROAD STREET  
PROVIDENCE, RI 02903  
[WWW.PROVHOUSING.ORG](http://WWW.PROVHOUSING.ORG)

<b>Annual PHA Plan (Standard PHAs and Troubled PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires: 03/31/2024</b>
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**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, including changes to these policies, 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.** The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only 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 the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 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.

<b>A.</b>	<b>PHA Information.</b>																														
	<b>PHA Name:</b> Providence Housing Authority <b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): 07/01/2024 <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) <b>Number of Public Housing (PH) Units:</b> 2,606 <b>Number of Housing Choice Vouchers (HCVs):</b> 2668 <b>Total Combined Units/Vouchers:</b> 5,274 <b>PHA Plan Submission Type:</b> <input type="checkbox"/> Annual Submission <input checked="" type="checkbox"/> Revised Annual Submission		<b>PHA Code:</b> RI 001																												
	<p><b>Availability of Information.</b> The PHA's Plan, Plan Elements, and all information relevant to the public hearing are available for inspection on the PHA's website at <a href="http://www.provhousing.org">www.provhousing.org</a>. Signage announcing the comment period and public hearing notified the public that copies of documents can be obtain by calling a designated PHA contact. Notice about the availability of viewing the plan and related documents is posted at the PHA's Administrative Office located at 100 Broad Street, 2<sup>nd</sup> Floor 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 approved PHA Plans on its website and provides each resident council with a copy of its Plans. PHA will make paper copies of materials available upon request.</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 15%;">PHA Code</th> <th rowspan="2" style="width: 30%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 15%; text-align: center;"><b>No. of Units in Each Program</b></th> </tr> <tr> <th style="width: 15%; text-align: center;"><b>PH</b></th> <th style="width: 15%; text-align: center;"><b>HCV</b></th> </tr> </thead> <tbody> <tr> <td>Lead PHA: Not Applicable</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	<b>No. of Units in Each Program</b>		<b>PH</b>	<b>HCV</b>	Lead PHA: Not Applicable																	
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<b>B.</b>	<b>Plan Elements</b>				
<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y    N</p> <p><input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> Operation and Management.</p> <p><input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input checked="" type="checkbox"/> Pet Policy.</p> <p><input checked="" type="checkbox"/> Asset Management.</p> <p><input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> Significant Amendment/Modification</p>				

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

#### **Revision to the PHA's 2025 Annual Plan**

After the submission of the Providence Housing Authority's (PHA) 2025 Annual Plan to HUD, the PHA revised its Administrative Plan for the Housing Choice Voucher (HCV) Program (Section 8) concerning policies that govern eligibility, selection, and admission. The revision of the HCV Administrative Plan is as follows:

#### **Chapter 4: Applications, Waitlist and Tenant Selection:**

- *Changed wording to the Rhode Island residency*
- *preference to reflect the preference applies to applicants who work, live or who have been hired to work in Rhode Island.*
- *Added a preference for families terminated from the PHA's HCV program due to insufficient funding.*
- *Changed the order of selection from the HCV Waitlist:*

The PHA will select families from the waiting list in the following order:

1. *The PHA will first select families that were terminated from the PHA's program due to insufficient funding.*
2. The PHA will next select families from the 2016 wait list who claim the VAWA preference.
3. The PHA will next select the remaining families from the 2016 wait list, based on lottery order.
4. The PHA will then select families from the new wait list who claim the residency preference, based on date and time of application.
5. Lastly, the PHA will select families from the new wait list who claim no preference, based on date and time of application.

## **Chapter 7 A and Chapter 7B: Verification**

- *Verification of Preference Status - Added language explaining how the PHA will verify preference status:*
  1. The PHA will verify that a family was terminated from the PHA's program due to insufficient funding through review of internal records.
  2. The PHA will verify that a family qualifies for the VAWA preference in accordance with documentation requirements in Chapter 16.
  3. The PHA will verify the Residency preference through review of the following documents:
    - Residency: two of the following documents:
      - Current lease
      - Utility bill with family name
      - Mail from the SSA
      - Unemployment benefits letter
      - Letter from social service organization
      - Financial institution documentation
      - Educational or school record
      - Current Driver's License or state issued Identification Card
- Work: Employment record or letter reflecting the work address as within the PHA's jurisdiction
- Hired to work: Letter of hire reflecting the work address as within the PHA's jurisdiction.

## **Chapter 12: Termination of Assistance and Tenancy**

***Insufficient Funding: PHA changed the order for terminating families due to insufficient funding by adding families on repayment agreements and removing families that pay the least amount of HAP:***

- Families who currently owe the PHA money will be terminated first, unless the family repays all amounts due within 30 calendar days of notification. This includes families currently under a repayment agreement with the PHA, other than families who owe the PHA money due to no fault of their own (example: families under a repayment agreement due to receipt of a lump sum payment for the delayed start of a periodic payment; see Ch 6), excluding families that include elderly or disabled family members.
- Next, families who have been assisted in the HCV program the longest will be the first to be terminated, excluding families that include elderly or disabled family members.
- Families comprising the required number of special purpose vouchers, including Mainstream and HUD-Veteran's Affairs Supportive Housing (HUD-VASH), EHV's will be the last to be terminated.

***Alternatives to Termination of Assistance:*** The PHA amended language to "Repayment of Family Debts" by adding that the PHA will not enter into a repayment agreement in lieu of termination if the PHA is experiencing insufficient funding.

- If a family owes amounts to the PHA, as a condition of continued assistance, the PHA **may** require the family to repay the full amount or to enter into a repayment

agreement, within 30 days of receiving notice from the PHA of the amount owed. **The PHA will not enter into a repayment agreement in lieu of termination if the PHA is experiencing insufficient funding as defined in this Chapter, unless the family includes an elderly or disabled family member. See Chapter 16 for policies on repayment agreements.**

#### **Chapter 16: Program Administration:**

- ***Amended language to “Family Debts to the PHA” by stating that the PHA may offer a repayment agreement for family debts.***
  - Any amount owed to the PHA by an HCV family must be repaid by the family. If the family is unable to repay the debt within 30 days, the PHA ~~will~~ may offer to enter into a repayment agreement in accordance with the policies below.
- ***Amended language to “No Offer of Repayment Agreement” by adding the PHA will not enter into a repayment agreement in lieu of termination if the PHA is experiencing insufficient funding:***
  - The PHA will not enter into a repayment agreement in lieu of termination if the PHA is experiencing insufficient funding as defined in this Chapter, unless the family includes an elderly or disabled family member.

#### **Chapter 17: Project-Based Vouchers:**

- ***Added Summer Street preference to PHA PBV Waitlist Preference:***
  - For the Summer Street project-based apartments, units will be initially reserved for current residents of the Travelers Aid Tower. Upon turnover, all vacancies will be filled by individuals experiencing homelessness who are referred by the Coordinated Entry System.

**The remainder of the 2025 Annual Plan as previously submitted remains unchanged.**

#### **Policies that Govern Eligibility, Selection, Admission, and Rent Calculation**

*Public Housing Program:* PHA reviewed and revised the public housing program Admissions and Continued Occupancy Policy (ACOP) relative to implementation of the Housing Opportunity and Modernization Act of 2016 (HOTMA). Mandatory HOTMA changes occur in the Introduction and Chapters 1,2,3,4, 6, 7B, 8, 9B, 13, and the Appendix. PHA adopted a discretionary HOTMA change in Chapter 7A with a policy change adding the use of third-party sources when utilizing *Upfront Income Verification* for new admissions and continued occupancy. A second discretionary change in the ACOP is in Chapter 2 with a language revision in the PHA’s point of contact for requests for reasonable accommodations for persons with disabilities. A summary of these all changes in the ACOP is attached as Attachment B.1(b)(1).

*Housing Choice Voucher Program:* PHA reviewed and revised the HCV Administrative Plan relative to mandatory implementation of the Housing Opportunity and Modernization Act of 2016 (HOTMA). Mandatory HOTMA changes occur in the Introduction and Chapters 1,2,3, 6A, 6B,7B, 8A, 8B, 9, 10, 11B12, 13, 14, 15, 16, 17, 19, in the Glossary, and in the Appendix. The PHA also made discretionary revisions to the Plan in Chapter 2, 5, 6A, 6B, 7A, 7B, 11A, and 11B. A summary of these changes is attached as Attachment B.1 (b)(2).

#### **Financial Resources**

	<p>A Statement of Financial Resources is included in this submission as Attachment B.1(b)(3).</p> <p><b><u>Operation and Management</u></b></p> <p>In response to staffing challenges in the post-Covid period, PHA supplemented its workforce with vendor services, particularly in the area of facilities management in terms of skilled trades. During this period, the PHA added capacity in the Facilities Management Department by adding an Associate Director position responsible for the administration of capital projects and contracts management. In the Resident Services Department, to best manage grant-funded initiatives, PHA added a supervisory position, a Wellness Program Manager, to the Department's supervisory structure. To increase internal and external communication and foster a growth in partnerships, PHA added a Communication Specialist in the Office of Strategy &amp; Development.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> <p>There has been no change to the PHA's Deconcentration Policy; it is included with this submission as Attachment B.1(c)(1).</p>
B.2	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y    N</p> <p> <input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.  <input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.  <input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.  <input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.  <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.  <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.  <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.  <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.  <input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.  <input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.  <input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.  <input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).     </p> <p>(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.</p> <p><b><u>Hope VI or Choice Neighborhoods, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion to Tenant-Based Assistance, Conversion of Public Housing to Project-Based Assistance Under RAD</u></b></p> <p>PHA continued to consider all available repositioning tools as it develops a PHA-wide asset preservation, repositioning, and potential redevelopment strategy for its real estate portfolio. In the past year, PHA's consultant the Dominion Due Diligence group conducted a Physical Needs Assessment and energy audit of PHA's public housing portfolio, excepting scattered site units. In the last fiscal year, the EJP Consulting Group completed a preliminary assessment of the feasibility of using a variety of repositioning tools to preserve, reposition, and or redevelop PHA's portfolio. In the coming year, PHA, with the assistance consultants, will begin a more in-depth analysis to develop a plan the portfolio. This analysis will be conducted in consultation with</p>

residents and in keeping with resident protection regulations. The first development to receive a more in-depth assessment will be Dexter Manor. The Rhode Island Interstate 195 Commission approached the PHA in 2024 about the possibility of the Commission conveying ownership of a parcel abutting Dexter Manor. The Commission has donated the services of its contracted engineering firm (UTILE) to draft development concepts for the parcel. In the next year, the PHA will use a \$250,000 predevelopment grant awarded by Rhode Island Housing to evaluate redevelopment concepts and options for Dexter Manor, possibly incorporating the Commission's parcel. In addition, PHA, in collaboration with City of Providence, has been considering submitting an application for the Choice Neighborhoods Planning Grant Program regarding the PHA's Chad Brown, Admiral Terrace and Sunset Village developments (PHA AMP3). PHA's repositioning consultant EJP Consulting Group conducted a two-day on-site feasibility exercise with potential partners (City of Providence, Rhode Island Department of Housing, RI Housing) on 2/4/25 and 2/5/25 to explore if this development and a surrounding target neighborhood would be eligible for a CNI award. PHA anticipates submitting a CNI Planning Grant application if we determine that these developments meet threshold requirements.

### **Project-Based Vouchers**

Due to current shortfall prevention actions and expected subsidy funding levels, the PHA does not anticipate issuing an RFP for project-basing vouchers in the coming year.

### **Designated Housing for Elderly and Disabled Families**

The PHA is requesting a renewal of its Designated Housing Plan; this plan is the designation of Carroll Tower and Dominica Manor as elder-only. The Certification of Statutory Requirements for Designated Housing Plan Renewal is attached as Attachment B.2.(a)(1).

### **Other Capital Grant Projects**

In the current year, PHA was awarded a HUD Housing-Related Hazards and Lead-Based Paint Capital Fund Grant to assess and remedy lead-based paint hazards in its Admiral Terrace development. Project activity is currently underway. Dependent on capacity and eligibility, PHA will pursue any additional grant opportunities for Capital Fund Community Facilities Program or Emergency Safety and Security Grant Programs made available by HUD in the coming year.

### **Units with Approved Vacancy for Modernization**

PHA anticipates that four (4) units will be approved for vacancy for modernization in the coming year. In addition, PHA was approved for removing one unit at the Chad Brown Apartments to serve as a base of operation for the newly funded Jobs Plus program at this development.

**B.3**

Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

Goal 1: Identify and Pursue Opportunities to Preserve and Expand Affordable Housing

Preservation/Repositioning/Redevelopment of Public Housing

Since the last Annual Plan submission, PHA procured the assistance of Dominion Due Diligence Group (D3G) to conduct a physical needs assessment (PNA) and energy audit to best inform any discussions about preservation/repositioning/redevelopment options. D3G has completed PNAs and energy audits for the PHA's real estate portfolio, excepting Scattered Sites. \$50,000 technical assistance grant from Rhode Island Housing (RIH) supported this project. As it considers housing preservation and repositioning options, PHA sought and secured a \$250,000 predevelopment grant from RIH to fund consultants necessary to consider preservation/repositioning/redevelopment concepts and options for Dexter Manor. Also related to Dexter Manor, the Rhode Island I-195 Commission has approached the PHA about the possibility of PHA acquisition of a parcel of Commission-owned land that abuts Dexter Manor. The Commission's engineering firm UTILE, is currently developing, at no cost to PHA, concepts for how the parcel could potentially be used by the PHA to benefit Dexter Manor and contribute to an overall preservation/redevelopment strategy. PHA has convened a working group that includes the I-195 Commission, UTILE, and PHA's repositioning consultant (EJP Consultants) to review the concepts. The working group is scheduled to meet on 2/11/25 to review concepts generated by UTILE. In the coming year, PHA will pursue other resources to fund exploration of preservation/repositioning/redevelopment strategies for other PHA properties. PHA has also engaged in an examination of how it could potentially utilize its existing non-profit affiliate to support redevelopment and new development activity. Since the last Annual Plan submission, PHA has conducted outreach to other PHAs engaged in repositioning activity to discuss their best practices and lessons learned information. On January 11, 2025, PHA conducted a Board retreat that featured a presentation by the Cambridge Housing Authority concerning their experiences in repositioning and development.

#### Project-Based Voucher Activity

To preserve and expand affordable housing opportunities for low-income families in the private market, PHA continued to engage in activity to project-base up to 30% of its voucher portfolio in this past year. Since the last annual plan submission, two PBV new construction projects have come online: Copley Chambers II & III (awarded in 2022) and Parcel 9-Phase 1 (awarded in 2021) on a parcel formerly owned by the I-195 Commission. Copley Chambers II & II is a 124-unit, mixed-use development with a health care center onsite: 8 PHA PBV units leveraged the construction of this development. Parcel 9, Phase 1, is a 66-unit, mixed income, mixed use development that features a childcare center onsite; 8 PHA PBV units leveraged the construction of this development.

Two other projects leveraged by PBVs awarded in 2022 are currently under construction; *Summer Street Housing Project* (34 PVBs, including 10 VASH PVBs) is a supportive housing model development featuring 176 one-bedroom units expected to come online in late 2025 or early 2026; Parcel 9, Phase 2 is a 61-unit, mixed income development in which PHA invested 8 PBVs that is anticipated to come online in early 2026.

PHA's project-basing of 29 vouchers in 2023 will leverage the construction of 183 units of affordable housing. PHA anticipates that four developers Crossroads RI (Pine Street Health and Housing), Omini Development (Newark Apartments), Lincoln Avenue Capital (Residences at 422 Washinton Street), and West Elmwood Development Corporation (Diamond & Fuller) that were

awarded PBVs in 2023 will secure funding of their projects by 6/1/25 and commence construction; these projects are projected to come on-line in 2026.

During this period, PHA continued to engage with Crossroads Rhode Island, to establish a pilot *Moving On* preference for admission to the public housing program for individuals referred by Crossroads Rhode Island who reside in the agency's Permanent Supportive Housing and/or Single Room Occupancy program who no longer need intensive case management. PHA and Crossroads RI are in the process of negotiating a MOU that includes the provision of continued supportive services for residents after their referral to the PHA. The PHA will limit this preference to 10 units in the first year. The PHA's public housing ACOP was revised in 2024 to reflect a *Moving On* admission preference and this change was reflected in the Annual Plan submitted by PHA.

PHA continued to modernize heating and cooling systems in its portfolio. PHA completed its first conversion of a mini-split HVAC system through a partnership with RISE engineering. RISE is a Project Expediter (PEX) in RI, an authorized contractor selected through a bid process to implement energy-efficiency projects that qualify for Rhode Island Energy's energy incentives. RISE secured energy incentives that funded the design and installation costs of the project – a value of \$1.2 million. PHA also partnered with RISE engineering to replace 25 boilers and circulating pumps at Chad Brown and Admiral Terrace developments, 14 of which have been completed as of 1/28/25 – a project that came at no cost to PHA and is valued at \$1,766,000. In addition to a partnership with RISE, it was a partner in a successful grant application to the EPA that will pilot the conversion of gas-fired stoves to electric stoves in a portion of the PHA's scattered site units in the coming year.

PHA undertook other projects to preserve its housing stock through the Capital Fund Program, including replacement of roofs on nine buildings at Manton Heights, completion of new emergency exit stairs at Roger Williams, and replacement of fire pumps at Carroll Tower and Parenti Villa high-rises, partially funded by a grant from the Housing Authority Insurance Risk Prevention Fund. PHA also completed the design of an interconnected fire alarm system for the Roger William Apartments; the project was put out to bid in 2024 and will be completed in 2025.

## Goal 2: Provide Safe & Healthy Communities with Pathways to Vibrant Futures

### Community Safety

Throughout the past year, the PHA worked closely with the Providence Police Department, the RI State Police and other law enforcement agencies, community organizations, and residents to develop and implement place-based approaches for addressing incidents of crime. The Office of Security Operations spearheaded an inter-departmental Community Safety Task Force, comprised of leaders from the Security, Resident Services, Property Management, Legal, and Executive Department that continued to meet monthly to share information about incidents and areas of concern, as well to identify underlying causes of negative behavior and plan and execute interventions that included referrals to services. The PHA's Victims of Crime Program and the Office of Security Operations continued to deliver regularly scheduled community safety meetings with residents at each PHA development to assist in identifying areas of concern and engaging residents in developing new community safety initiatives.

The PHA's Office of Security Operations continued to work closely with the Providence Police Department (PPD) to address crime in and around PHA properties. PHA regularly provides surveillance camera footage – a resource that has been an important tool in the investigation of cases and identification of suspects. In addition, the leadership of the Office of Security Operations participates in interagency law-enforcement task efforts focused on addressing and preventing weapons, narcotics and gang-related activity. PHA has increased its application of crime prevention through environmental design (CPTED) principles by assessing developments, including identifying needed trimming of foliage and growth interfering with cameras and line of sight and assessing needs for additional surveillance cameras and upgraded lighting. As of the date of this report, PHA has installed additional cameras and lighting at the Manton Heights, Chad Brown, and Hartford Park developments. These security improvements were supported by a combination of CFP and City of Providence funding. PHA also increased security by completing the installation of a new hallway surveillance camera system at its Kilmartin Plaza high-rise. The presence of this new system has proven to be a deterrent to persons from this transient neighborhood seeking to gain access to the building. A grant from the RI Office of Healthy Aging and CFP funding made this project possible. Since the PHA's last Annual Plan submission, PHA completed the replacement of the last building entry door at high-rise developments. Also in 2024, PHA completed the design phase for the replacement of building exterior doors at the Codding Court, Manton Heights, and Roger Williams Apartments and the project has gone out to bid. PHA anticipates that the project will be completed in mid to late 2025; the source of funding for all door replacement projects noted is the Capital Fund Program and CDBG grants from the City of Providence.

### Economic Opportunity *Jobs Hub*

The PHA's Resident Services Department continued to operate the *Jobs Hub* Program to meet the needs of residents struggling financially in the wake of the pandemic at the PHA's family developments. In the past year, the PHA has expanded the program from serving families at Hartford Park and Manton Heights to serving other family developments. The *Jobs Hub* Program model incorporates the following workforce development strategies to help unemployed persons with significant barriers to employment secure jobs: industry-driven training programs, pre-apprenticeship and Registered Apprenticeships, progressive education and credentialing pathways, and wrap-around supportive services. The *Jobs Hub* Program has engaged local partners to deliver comprehensive employment-related services categorized into five areas: (1) employment readiness, (2) job training and internships; (3) job placement; (4) job retention and advancement, and (5) work-enabling social services. The *Jobs Hub* Program also encourages the participation of employed residents to foster upskilling and increased income. In 2024, the Resident Services Workforce Development Team engaged with 77 residents, aiding 36 residents in resume writing, assisting 38 residents with interview preparation, and 57 residents received one-on-one coaching and were newly employed because of the program. PHA held a jobs fair in 2024 where nine employment partners participated, and 58 residents were in attendance. In 2024, PHA was engaged in its seventh year of summer youth employment program, in collaboration with the City of Providence, that served 21 youth with 81% of participants completing the seven-week program. The program provided paid internships, skill building, and soft skills development necessary for work readiness. The PHA is committed to fostering residents' career development and employment opportunities and fostering economic opportunity. PHA is thrilled to have been selected in 2024 to receive a HUD Jobs Plus Program grant. This new award is the second Jobs Plus grant award for PHA in less than a decade. This new nearly \$2.3 million grant multi-year

Jobs Plus program will be focused on the Chad Brown and Admiral Terrace Apartments. In preparation for launching the program, PHA conducted a survey of residents of these two developments that resulted in 149 residents indicating an interest in participating in the program. PHA has completed staffing off the program and the program is scheduled to begin on 2/3/25.

In 2024, the PHA reached an agreement with its Painters' Union to develop a three-year apprenticeship program for residents interested in becoming Union painters. The program will include 145 hours of safety training each year. At the completion of the apprenticeship program, graduates will be considered full-fledged journeymen painters. The PHA and the Painters' Union intend to implement the apprenticeship program during calendar 2025. In 2024, PHA continued to operate its administrative and facilities maintenance training program as a means of providing residents with marketable skills that they can use at PHA or at other employers. Participants enter this program at minimum wage and, upon passing quarterly reviews and meeting performance goals, receive wage increases during participation in the program. Throughout their time in the program, participants receive coaching and support from employment case managers from the Resident Services Department. Graduates of the program are frequently hired for full-time PHA positions as they become vacant or are hired by other employers. In FY 2024, 37% of new PHA hires were Section 3 residents.

#### *Family Self-Sufficiency Program*

On 12/31/24, PHA had a total of 154 families participating in its FSS program; 51% were public housing families and 49% were HCV participants. Calendar year 2024 saw a slight increase in participation compared to 2023. In calendar year 2024, PHA disbursed \$186,140.88 in escrow account funds to program participants and an average of 64% of participants increased their income during the year. PHA looks forward to continuing the FSS program with a newly awarded HUD FSS grant. Two FSS program participants have been able to leave public housing this past year as a result of buying their own homes.

#### *Homeownership & Financial Literacy*

As a certified homeownership counseling agency, PHA engaged with 59 public housing residents and HCV participants interested in becoming homeowners. The program lost its certified homeownership counselor mid-way through year, causing the PHA to put homeownership counseling on pause until a replacement is onboarded. The Homeownership Program hosted its 18<sup>th</sup> annual homeownership fair in 2024; 53 participants attended the event that provided opportunities for exposure to affordable purchase options, new mortgage products, and local programs for low and moderate-income first-time homebuyers. In calendar year 2024, three program participants became homeowners. In 2024 PHA residents and program participants had access to 14 financial literacy workshops provided by Washington Trust and RhodeWay, a non-profit organization that provides financial literacy, financial planning, and budgeting programming for low-income residents.

#### *Adult-Basic Education*

In 2024, diminished staffing levels in partner agencies that provide adult basic education limited programming available to residents. In 2024, 26 residents were enrolled in ESL classes. Currently, PHA is working to forge expanded partnerships to enhance access to ESL and other adult education programming to meet the needs of residents currently on a waiting list for classes.

<p>Health and Wellness</p>	<p><i>Mental Health Services:</i> The PHA's Wellness program continued to grow in 2024 with the addition of a Mental Health Services Coordinator joining the team in July. The Mental Health Services Coordinator served 225 residents by providing short term counseling and referral to treatment and supportive programming; the Coordinator currently has an active caseload of 137 residents.</p> <p><i>Community Health Outreach:</i> Community Outreach Workers continued to be a critical component of the PHA's Wellness program, bringing health education, raising awareness of common health challenges, and exposing residents to providers through on-site health fairs and health screening clinics. The Community Health Workers served over 250 residents and provided 48 educational workshops across PHA developments in 2024.</p> <p><i>Food Insecurity:</i> Food insecurity continued to be challenge for many residents, particularly elders. In 2024, the PHA's Elder Food Box program, supported by a partnership with the Rhode Island Community Food Bank, provided over 200 boxes of nutritious food each month to elders residing in high-rise locations.</p> <p><i>Collaboration with the Community to Promote Wellness:</i> As part of the agency's ongoing commitment to fostering health and wellness, PHA staff continued to serve as active members of the Central Providence and South Providence Health Equity Zones and participated in community events that attracted the participation of a wide range of City residents, including public housing and HCV families. PHA staff continued to actively participate in activities of the Mayor's Coalition on Behavioral Health and the Governor's Overdose Prevention and Intervention Task Force. PHA staff also continued to partner with the Rhode Island Department of Health to develop strategies to address triggers of asthma and other respiratory illnesses. Outcomes of this ongoing partnership was the installation of air quality monitors on several buildings in PHA development near major traffic centers, the provision of 50 free air conditioners and excess utility payments by Rhode Island Department of Health to PHA residents afflicted with chronic respiratory illnesses, and a new partnership to replace gas-fired stoves in a portion of our scattered site units at no cost to PHA.</p> <p><b>Technology and Use of the Internet</b>  Over the past two years, PHA has devoted significant attention to the issue of resident use of the technology and the Internet in partnership with the Providence Public Library, Commerce Rhode Island, and the City of Providence to bring outreach sessions about the Affordable Connectivity Program (ACP) to all PHA developments to raise awareness of and enroll residents in free or low-cost Internet plans. After significant success in enrolling residents and increasing use of the Internet, the ACP expired and PHA partnered with the Providence Public Library in 2024 to raise awareness of the end of the program, educate residents about their rights, and potential low cost-ways to acquire the Internet.</p> <p><b>VAWA and VOCA</b>  In January 2025, PHA began its 6<sup>th</sup> year of its Victims of Crime (VOCA) program, funded by a Victims of Crime Act grant through the state of RI and a federal grant from the U.S. Department of Justice. The program served 459 residents in 2024. The program places significant focus on serving survivors of domestic violence, dating violence, sexual assault, stalking, and human</p>
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trafficking. The program utilizes a holistic approach by serving victims and their families. During and post-pandemic, PHA staff continued to note a sustained increase in the number of domestic violence incidents. To meet this increased need, PHA expanded the program's staffing by expanding the program to serve and support HCV participants. In addition to assistance with safety planning, understanding VAWA policies, and navigating the criminal justice system to hold perpetrators accountable and protect victims, the Victims of Crime program provided support groups in English and Spanish, facilitated referrals to a range of services, and added a mental health services coordination component to the program in 2024.

In calendar year 2024, PHA received 31 requests from residents and HCV participants to invoke the VAWA policy. The most common request of victims was a request for a transfer to another unit to flee domestic violence. PHA continued to provide a copy of the VAWA policy during new admissions and recertification meetings for PHA housing programs, and the policy is included in adverse action letters. VOCA Community Safety Coordinators attend HCV briefing sessions and provide information about the VAWA policy. Over 40% of persons served by the VOCA program are victims of domestic violence, adult sexual assault, or stalking. PHA also provides a copy of the VAWA policy at each intake meeting conducted by VOCA Community Safety Coordinators. The PHA Human Resources Department has reviewed the new employee orientation program and has implemented information about the VAWA policy and PHA responsibilities in new employee orientation sessions. PHA continued to work with over 30 state and local organizations and law enforcement agencies to meet the needs of victims of domestic violence, dating violence, sexual assault, and stalking. To date, the program has not encountered a victim of human trafficking.

#### Tenancy Preservation

A significant challenge for PHAs during the post pandemic period has been a persistently higher rate of rental delinquency compared to pre-pandemic levels. PHA has deployed an inter-departmental team of Property Management and Resident Services Department staff to work with residents and outside agencies to connect residents with programs and services that provide sources of emergency rental assistance funds, financial counseling, and supportive services to address the root causes of non-payment of rent. Resident Service Coordinators play a central role in tenancy preservation by continuing to streamline services and provide follow-up assistance to residents to keep them on track with rent payments, court agreement stipulations and established rent repayment plans. PHA is currently engaged with the RI Department of Human Services as it works to implement a new eviction prevention program. PHA anticipates working with RI Legal Services in the coming year to assist the agency in developing and implementing a new grant-funded program designed to address the root causes of housing instability.

#### Goal 3: Cultivate, Enhance and Evaluate Strategic Partnerships

Since the submission of the last Annual Plan, PHA has engaged in a wide range of activity designed to strengthen existing partnerships and forge new partnerships that support the preservation of existing housing, expansion of affordable housing, and provision of high-quality services to the families served by the PHA.

**Resident Advisory Board:** The PHA continues to consider its partnership with the Resident Advisory Board (RAB) to be among its most important collaborations. The RAB is currently comprised of 15 resident representatives, including one who is an HCV participant, who meet ten times per year with PHA representatives. In the past year, members worked to develop a RAB mission and vision statement and identify core values. RAB meetings continued to be a forum for

developing the Annual Plan, sharing information, collecting resident input on new policies and projects, identifying resident needs, and fostering resident leadership. In 2025, the nomination and election process will be held to secure RAB members for a new two-year term. To secure at least one representative from every development in the PHA's portfolio and PHA's HCV program, including PBV developments, the PHA's Resident Engagement Coordinator will conduct significant outreach to raise awareness of the importance of the RAB and the process by which residents can serve as members of the RAB.

**Public Housing Advocacy:** On a state-wide level, PHA has played a leadership role in an effort with the Public Housing Association of Rhode Island (PHARI) to raise the awareness of elected officials and other leaders about the significant role public housing authorities play in providing quality housing programs and the role they could potentially play in helping to address the affordable housing crisis. PHA authored the *2024 PHARI Housing Fact Book*, a collection of data about each RI housing authority that illustrates the positive impact that public housing authorities make on the communities in which they are located. This publication was released in July 2024 and is currently being utilized in a variety of outreach and education initiatives. *The Housing Fact Book* was an outgrowth of an inter-agency presentation by PHARI members, including PHA executives, to the RI Special Legislative Commission on Low and Moderate-Income Housing in May 2023. PHA Executives will continue to be active in this type of education and outreach activity, including a planned presentation to the RI Housing Resources Commission in February 2025.

**High-Quality Early Childhood Education:** PHA views access to high quality early education as a key contributor to breaking the cycle of poverty experienced by many public housing residents. Through a new collaboration with the Boston Celtics Shamrock Foundation and its partners, as well as the Rhode Island Local Initiatives Support Corporation (LISC), and the RI Department of Human Services, the PHA is engaged in a five-year pilot initiative to increase opportunities to high-quality early childhood education and family supports for public housing families residing in Manton Heights and nearby Hartford Park. The goal of this partnership is to support parents in ensuring that their children are ready for success in school. Since the last Annual Plan submission, the partnership conducted research about best practices in early childhood education and, with an architectural firm, has completed preliminary drawings for the redevelopment of the facility. LISC provided \$50,000 funding to support an architectural feasibility study of the facility, and the Boston-based Foundation and its partners have pledged funding for the renovation of the facility and support of operational costs of a provider who will deliver the early education program. The PHA anticipates that the program will open in late 2025 or early 2026.

**One Nation, One Project Initiative (ONOP):** In 2023 and 2024, PHA partnered with the City of Providence's Department of Arts, Culture and Tourism and the National League of Cities for the *ONOP* nationwide community art initiative. The *ONOP* initiative, funded in part by grants received by the City from the National League of Cities and the Doris Duke Foundation, with additional funding from the City of Providence (Offices of Healthy Communities and Art, Culture and Tourism), featured the pairing of artists-in-residence with PHA community health workers at the Chad Brown family development and the Carroll Tower designated elderly-only development. The aim of the project was to use the arts as a vehicle for increasing the engagement of public housing residents in wellness activities community building. This multi-year initiative provided funding for three community health worker positions and a mental health coordinator position. The artists and community health workers met weekly through November 2024 with residents to

assist them in developing artistic skills, working on projects that were unveiled as part of a nationwide celebration on 7/28/24, and sharing important information about health and wellness. At Carroll Tower, residents designed and created a large tree of life mosaic that was permanently installed in the community room and unveiled during a gala community event. At Chad Brown, residents participated in two events, the unveiling of a fashion line and a painting exhibit created by residents on 6/20/24 and an indoor and alfresco art exhibition of works created by residents, the artist-in-residence, and artists from the larger community on 7/28/24. Works created by residents of both Carroll Tower and Chad Brown were on display in a gallery at the Providence City Hall during the month of August 2024. PHA anticipates continuing art and wellness programming at other PHA locations in the coming year.

Program Coordinating Committee: Since the last Annual Plan submission, PHA has had notable success re-energizing its Program Coordinating Committee (PCC) that guides FSS and other resident services program development by returning to in-person quarterly meetings; PCC membership now includes 35 members. PHA has also maintained a group of over 30 employer partners, who provide internship and employment opportunities to participants in our workforce development programming.

Partnering to Make Natural Resources Accessible to PHA Residents: In the past year, the PHA has continued to collaborate with the Woonasquatucket River Watershed Council (WRWC) to explore the construction of an additional pathway linking the Hartford Park community to the natural resources of Woonasquatucket River Greenway. The PHA and the WRWC anticipate conducting a community meeting in early spring to gather Hartford Park resident input on the project plan. The PHA previously partnered with the WRWC to create the Manton Pathway that connected PHA residents at Manton Heights with the resources of the Greenway; PHA was a 2024 recipient of a NAHRO Award for Design Excellence for the Manton Pathway project.

Partnering with the Community: Since the last Annual Plan submission, PHA staff have continued to serve on a wide range of boards, committees and task forces, including but not limited to: Workforce Solutions of Providence/Cranston Board; Habitat for Humanity Board; City of Providence Mayor's Coalition on Behavioral Health Board; WIOA Youth Employment Committee; South Providence HEZ Steering Committee and its Chronic Health Conditions sub-committee, and Central Provide HEZ Employment Working Group. Executive Director Melissa Sanzaro serves as a member of the RI Housing Resource Commission representing the housing authorities of RI, as a member of the Board of the RI Public Health Institute, as co-vice chairperson of the Public Housing Authorities Association of RI, and as a member of the Community Advisory Boards of the United Way of RI and Washington Trust. Deputy Director Jacqueline Martinez serves as a member of the RI Continuum of Care and the Providence Community Health Centers' Community Advisory Council.

#### **Goal 4: Continuously Improve PHA Internal Management and Operations**

##### **Board Development**

Since the submission of the last Annual Report, PHA has onboarded one new Commissioner. To support new Commissioners and existing Commissioners to best carry out their roles, PHA continued to identify training topics of interest to the Commissioners. During this past year PHA integrated presentations about topics of interest during Board meetings, conducted a half-day

retreat, and identified training events conducted by national industry leaders such as NAHRO, CLPHA and Nan McKay for Board member consideration. In August, a representative of the State Ethics Commission provided a training about the RI State Ethics Law and Commissioner responsibilities relative to the law. On 1/11/25, Board members participated in the PHA's annual Board and staff retreat. The retreat, titled *Opportunity Knocks*, featured an update on PHA's repositioning planning, a presentation by the Cambridge Housing Authority (MA) concerning that agency's lessons learned in repositioning assets, a panel discussion about the PHA's new cross-sector collaboration concerning early childhood education, and an interactive planning activity focused on updating the PHA's strategic plan.

#### Building Capacity

During this reporting period, the PHA continued to assess its organizational structure and began to examine how capacity may need to be expanded, particularly in relation to real estate development and capital projects management. During this period, the PHA added capacity in the Facilities Management Department by adding an additional Associate Director position responsible for the administration of capital projects and contracts management. In the Resident Services Department, to best manage grant-funded initiatives, PHA added two supervisory positions - a Workforce Development Program Manager and a Wellness Program Manager to the Department's supervisory structure.

#### Employee Recruitment and Retention

PHA, like many public sector employers, continued to be challenged by two realities: a changed labor market in which it is more difficult to recruit and retain highly qualified staff and an aging workforce where succession planning has become a significant priority. Throughout the year, the PHA's Human Resources Department researched and implemented new employee support initiatives, adjusted salary schedules, and developed new programs designed to build teamwork. Providing middle management employees with leadership training this past year was a critical first step in a plan to prepare employees for promotional opportunities that will arise in the next several years due to pending retirements.

#### Teambuilding to Support Internal Management and Operations

In 2024, the PHA's Executive Department engaged the leadership of all Departments in senior staff sessions focused on celebrating success in Year 4 of the agency's five-year strategic plan, identifying obstacles to success and devising inter-departmental strategies to overcome barriers to success in Year 5, as well as identifying goals and strategies for inclusion in the PHA's next five-year plan. In August of 2024, PHA launched its first annual Values in Action awards to honor staff members whose contributions to the PHA reflect the PHA's five core values. Staff selected to receive these awards were nominated by their peers and celebrated at an all-staff event in August.

#### Staff Development and Training

Since the last Annual Plan submission, the PHA's Human Resources Department reviewed training needs and developed training schedules. Since the last Annual Plan submission, all PHA staff participated in Harassment and Discrimination Training. Senior staff and members of the Board of Commissioners received ethics training delivered by a representative of the RI State

Ethics Commission. During this time period, staff in middle management positions also participated in leadership training. All staff are currently in the process of comprehensive training necessary for use of the PHA's new operating software system that will come fully online in April 2025. Staff members of the Resident Services Department, Leased Housing and Property Management Departments also received customer service training.

#### Technology and Cyber Security

The PHA, after using HAB software for many years, issued a request for proposals in 2024 for an operating software system and selected PHAWeb as the PHA's new operating software system. Staff is currently undergoing training to use the new software and PHA is preparing for the migration of all data and full launch for the software in early Spring 2024. Because the PHA takes seriously its responsibility to safeguard sensitive information held in its software program and on devices, PHA continues to engage a vendor that provides cybersecurity monitoring and ongoing cyber security training for all staff.

#### Use of Interdepartmental Strategy Committees

##### *Leased Housing Strategy Committee*

In early 2024, the PHA Leased Housing Strategy Committee worked closely with the HUD Regional Office to implement strategies to maximize HCV voucher utilization. In March 2024, PHA was notified that it was at risk of shortfall and worked closely with HUD's Shortfall Prevention Team throughout 2024 and into 2025. PHA received two Shortfall Funding awards and continued to develop and implement strategies to prevent further shortfall while ensuring that as many families as possible are served by the HCV program. The Leased Housing Strategy Committee was guided by the Finance and Accounting Department that continued to provide vital guidance about strategies for maximizing utilization of subsidy within the confines of HUD's shortfall prevention plan. Currently, the Committee is researching best practices from several subject matter experts, including Nan McKay and NAHRO, about addressing and navigating potential cuts in HUD funding and avoiding shortfall.

##### *Security Operations Strategy Committee*

In 2024, a committee comprised of representatives of the Security Operations, Resident Services, Property Management and Executive Departments continued to meet to identify challenges to safety and security and develop initiatives to address these challenges. The Committee also developed the framework for Community Safety meetings at all developments and the Office of Security Operations coordinated the content and delivery of these meetings at all developments during the year. The Committee developed and the PHA's Office of Security Operations led the PHA's Community Safety Task Force, an inter-departmental group that meets regularly to identify security and safety issues across the portfolio and develop and deploy strategies for addressing specific threats to safety and security. The membership of this group expands when necessary to include representation from law enforcement and community agencies. A key goal of the Task Force is to identify underlying causes of behavior that if left unaddressed would threaten the safety of PHA communities. Included in strategies utilized by the Task Force are home visits and one-on-one meetings by members that include offers of referrals to services as a means of curing lease violations. The Task Force also works with the Providence Police Department and community partners to develop strategies to address new and emerging trends in safety and security.

#### *Public Housing Assessment System (PHAS) Strategy Committee*

Since the last Annual Plan submission, this PHA convened an interdepartmental team that includes representation from the Executive, Finance, Property Management, Admissions, and Facilities Management, as well as the Office of Strategy and Development. The charge of this Committee that meets monthly is to track PHAS performance indicators, identify obstacles to PHAS high performance, research best practices, and develop and implement corrective strategies and best practices in the areas of unit inspections, unit turnaround, occupancy, and rent collection.

#### *Vendor Task Force*

The Vendor Task Force, led by the Finance and Accounting Department and including representatives from the Legal, Facilities Management, and Executive Departments continued to meet to track contracts, review change orders, and monitor internal controls and contract tracking protocols to ensure high performance by vendors, minimize change orders, and ensure cost containment in contracts.

#### **Policy Review and Revision**

The PHA's Finance and Accounting Department completed the review of its operating policies and procedures and revised its policies to reflect HUD model policies recommend by the HUD in its Compliance Monitoring Review. Also in 2024, the PHA also reviewed and updated all policies related to ethics with the assistance of the PHA's General Counsel, Labor Counsel, and the RI State Ethics Commission. In addition, the Leased Housing, Property Management and Admissions Departments reviewed the PHA's Public Housing Admissions and Continued Occupancy Policy and the HCV Administrative Plan to update these documents to ensure compliance with new HOTMA requirements and foster effective and efficient administration of these programs. The changes to these documents were outlined in Section B of this submission.

#### **Facilities Management and Preservation of PHA Public Housing**

In 2024, PHA undertook major capital projects designed to preserve public housing units, including: Roof replacement at Kilmartin Plaza; the demolition and replacement of emergency exit staircases and skylights at the Roger Williams Apartments, completion of the replacement of nine roofs at Manton Heights Apartments, including the raising of exterior entrances to come into compliance with new state codes concerning insulation; and the replacement of boilers and circulating pumps at 16 buildings within the Chad Brown Apartments. Since the last Annual Plan submission, PHA implemented a portfolio-wide plan for upgrading bathtubs and tub surrounds, including the engagement of an outside vendor to augment PHA personnel and support this initiative that plays a role in decreasing unit turnaround time.

#### **Modernizing Heating and Cooling Systems and Utilizing New Technology**

To promote greater efficiency and savings, the Facilities Management Department worked with RISE Engineering in 2024 to assess the potential for savings and developed an energy efficient boiler replacement plan that will be integrated into the PHA's 5-Year Capital Plan. A significant immediate outcome of this partnership was the installation of 25 new efficient boilers at the Chad Brown development at no cost to the PHA; the value of this project is \$1,766,000. As of 12/31/24, PHA had installed 16 of the 25 boilers that will be replaced as part of the project. Related to the installation efficient boilers at the Chad Brown Apartments, PHA also completed the design of a multi-phase project that will replace hydronic feed pipes. At Kilmartin Plaza, PHA and RISE Engineering completed the installation of a mini-split system for heating and cooling individual units and common spaces. This \$1.4 million project was designed and installed at no cost to the PHA. Additionally, PHA implemented the first stage of its plan to convert of a portion

	<p>of its fleet of vehicles to electric vehicles and purchased 3 all-electric vehicles to replace a portion of its vehicle fleet.</p> <p><b>Funding Diversification</b></p> <p>Since the last Annual Plan submission (April 2024), the PHA engaged in interdepartmental grant writing that yielded notable grant awards that supported PHA operations and resident services, including, but not limited to:</p> <ul style="list-style-type: none"> <li>• \$2,282,473, HUD Job Plus;</li> <li>• \$2,055,521, HUD Lead-Based Paint Hazards Capital Grant;</li> <li>• \$715,614 HUD ROSS Grant;</li> <li>• \$250,000, Rhode Island Housing Pre-development Grant;</li> <li>• \$219,159, HUD Family Self-Sufficiency;</li> <li>• \$208,024, Housing Authority Insurance Risk Prevention Grant; and</li> <li>• \$185,000, RI Department of Health Asthma Grant.</li> </ul>
	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>The date of the most recent HUD-approved 5-Year Action plan was 1/2/25</p>
B.5	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y    N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p><b>Other Document and/or Certification Requirements.</b></p>
C.1	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y    N  <input type="checkbox"/> <input type="checkbox"/> To be completed after public comment period.</p> <p>(b) 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. See Attachment C.1.</p>
C.2	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</a>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y    N</p>

	<p><input type="checkbox"/> <input type="checkbox"/> To be completed after public comment period.</p> <p>If yes, include Challenged Elements.</p>			
C.5	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y    N    N/A  <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>			
D.	<b>Affirmatively Furthering Fair Housing (AFFH).</b>			
D.1	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1"> <tr> <td><b>Fair Housing Goal:</b></td> </tr> <tr> <td><u>Describe fair housing strategies and actions to achieve the goal</u></td> </tr> <tr> <td><b>Not Applicable</b></td> </tr> </table>	<b>Fair Housing Goal:</b>	<u>Describe fair housing strategies and actions to achieve the goal</u>	<b>Not Applicable</b>
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<u>Describe fair housing strategies and actions to achieve the goal</u>				
<b>Not Applicable</b>				
	<b>Fair Housing Goal:</b>			

	<p><b><u>Describe fair housing strategies and actions to achieve the goal</u></b></p> <p><b>Not Applicable</b></p>
	<p><b>Fair Housing Goal:</b></p> <p><b><u>Describe fair housing strategies and actions to achieve the goal</u></b></p> <p><b>Not Applicable</b></p>

## Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

### A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

**PHA Consortia:** Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

### B. Plan Elements. All PHAs must complete this section.

#### B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” ([24 CFR §903.7](#))

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. ([24 CFR §903.7\(a\)](#)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(2\)\(i\)](#)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. ([24 CFR §903.7\(b\)](#)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. ([24 CFR §903.7\(b\)](#)) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. ([24 CFR §903.7\(b\)](#))

**Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

**Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. ([24 CFR §903.7\(d\)](#))

**Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. ([24 CFR §903.7\(e\)](#))

**Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. ([24 CFR §903.7\(f\)](#))

**Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#))

**Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of ([24 CFR §903.7\(l\)](#)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. ([24 CFR §903.7\(l\)](#))

**Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. ([24 CFR §903.7\(m\)](#)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. ([24 CFR §903.7\(m\)\(5\)](#))

**Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#))

**Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. ([24 CFR §903.7\(q\)](#))

**Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

**Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#))

**B.2 New Activities.** If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

**HOPE VI or Choice Neighborhoods.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6) . ([Notice PIH 2011-47](#))

**Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4)

**Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

**Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

**Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices](#).

**Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.503\)](#) (24 CFR 903.7(b))

**Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.505\)](#) (24 CFR 903.7(b))

**Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03. \(24 CFR §903.7\(e\)\)](#)

**Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan ([24 CFR §903.7\(b\)](#)).

**Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

**B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

**B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

**C. Other Document and/or Certification Requirements.**

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

**C.2 Certification by State of Local Officials.** 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. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

**C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#)).

**C.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.

**C.5 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark “yes,” and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark “no.” If the PHA is not troubled, mark “N/A.” ([24 CFR §903.9](#))

**D. Affirmatively Furthering Fair Housing (AFFH).**

**D.1 Affirmatively Furthering Fair Housing.** The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: “To implement goals and priorities in an AFH, strategies and actions shall be included in program participants’ ... PHA Plans (including any plans incorporated therein) .... Strategies and actions must affirmatively further fair housing ....” Use the chart provided to specify each fair housing goal from the PHA’s AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless , the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Privacy Act Notice.** The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

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