The Pawtucket Housing Authority FY 2024 Annual Plan





Annual PHA Plan

- HUD-50075-HP
- Supplemental Information
 - A.1 PHA Information
 - B.1 De-concentration Policy
 - o B.3 PHA's Progress
 - o C.1 Resident Advisory Board Comments
 - o **HUD-50077-SL**
 - HUD-50077-ST-HCV-HP
 - HUD-50077-CR
- Statement of Significant Amendment
- HUD 52840-A 2023 Capital Fund

Streamlined Annual	U.S. Department of Housing and Urban Development	OMB No. 2577-0226
PHA Plan	Office of Public and Indian Housing	Expires 03/31/2024
(High Performer PHAs)		

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

Definitions.

- 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 <u>both</u> the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, and 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.

1.	PHA	Information.	
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В.	Plan Elements
B.1	Revision of Existing PHA Plan Elements. (a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission? Y N Statement of Housing Needs and Strategy for Addressing Housing Needs. Deconcentration and Other Policies that Govern Eligibility. Selection. and Admissions. Financial Resources. Ment Determination. Homeownership Programs. Safety and Crime Prevention. Pet Policy. Substantial Deviation. Significant Amendment/Modification (b) If the PHA answered yes for any element, describe the revisions for each element below: (c) The PHA must submit its Deconcentration Policy for Field Office Review. ATTACHED
B.2	New Activities. (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N Y N Mixed Finance Modernization or Development. X Demolition and/or Disposition. X Conversion of Public Housing to Tenant Based Assistance. X Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. X Project Based Vouchers. X Units with Approved Vacancies for Modernization. X Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the project-Based units and general locations, and describe how project basing would be consistent with the PHA Plan.
В.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan. ATTACHED
B.4.	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved 5 Year Action Plan for 2023 – 2027 approved on 04/06/2023

B.5	Most Recent Fiscal Year Audit
	(a) Were there any findings in the most recent FY Audit?
	(b) If yes, please describe:
C.	
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the PHA Plan?
	Y N X
	(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.
C.2	Certification by State or 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.
	ATTACHED
С.3	Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.
	Form 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.
	ATTACHED
C.4	Challenged Elements. 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.
	 (a) Did the public challenge any elements of the Plan? Y N □ ⊠
	If yes, include Challenged Elements.

D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing. 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. Fair Housing Goal: Describe fair housing strategies and actions to achieve the goal
	Examine policies and demographic patterns for any actions, omissions, or decisions which have the effect of restricting housing choices, or the availability of housing choices based on race, color, religion, sex, disability, familial status, or national origin.
	Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability, and national origin.
	Fair Housing Goal:
	Describe fair housing strategies and actions to achieve the goal An assessment of the availability of affordable, accessible housing in a range of unit sizes.
	Promote housing that is <u>structurally accessible</u> to, and usable by, all persons, particularly persons with disabilities. Make public housing a path to social and economic mobility, rather than housing of last resort by targeting selected developments for modernization and for other improvements and facilities to make them attractive to current residents and to suburban residents.
	Fair Housing Goal:
	Describe fair housing strategies and actions to achieve the goal
	ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE.
	Secure the cooperation of other important officials whose impact upon fair housing is substantial, including jobs, schools, transportation, and social services, important industries in the area who can provide job opportunities, and Government and not-for-profit agencies that provide social services.
	Assist in building public support for fair housing efforts both within a State or Entitlement jurisdiction's boundaries and beyond.

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form HU'D-50075-HP (03/31/2024)

CARDING STREET, SAL

Question for Pawtucket Housing Authority Annual Plan FHEO Review 2024

Current occupant demographic data and public housing and HCV waitlist demographic data.

See attachment #1 of Tenant Statistical Reporting – PH Tenant Stats

See attachment #2 of Applicant Statistical Reporting – PH 0 beds, PH 1 beds, PH 2 beds

HCV applicants come off the State of Rhode Island Centralized Wait List run by RI Housing.

Are site-based waiting lists being used or will they be used?

Public Housing PHA Policy:

- The PHA will not adopt site-based waiting lists.

Can you provide more information of what steps the PHA has taken to reduce any existing racial and national origin concentrations or prevent concentrations from developing?

See attachment #3 PHA Admissions Preferences

Public Housing PHA Policy:

The PHA will maintain community-wide waiting lists by bedroom size for its developments. Within the list, the PHA will designate subparts to easily identify who should be offered the next available unit (i.e., mixed populations, general occupancy, unit size, and accessible units).

The PHA must establish tenant selection policies for families being admitted to public housing [24 CFR 960.201(a)]. The PHA must not require <u>any specific income or racial quotas</u> for any developments [24 CFR 903.2(d)].

The PHA must not assign persons to a particular section of a community or to a development or building based on race, color, religion, sex, disability, familial status, or national origin for purposes of segregating populations [24 CFR 1.4(b)(1)(iii) and 24 CFR 903.2(d)(1)].

HCV PHA Policy:

The PHA will maintain a single waiting list for the HCV program. The waiting list is program based and has the following local preferences:

- o Residency Preference
- Working Preference
- o Disabled person Service Connected (Veteran) Preference
- o Chronically Homeless Veteran
- o Rhode Island Resident
- o Displaced by Natural Forces
- o Displaced due to Domestic Violence

Question for Pawtucket Housing Authority Annual Plan FHEO Review 2024

- o Chronically Homeless Families
- An applicant will be placed on the waiting list by the date and time of application and then ranked according to the number of preferences he/she may qualify for.
- The PHA aggregates the number of preferences an applicant qualifies for (example: two local preferences outweigh one).
- No single family member household will be housed before an elderly or disabled person household.

Can you provide more information about steps taken to overcome any condition that, in the past, have resulted in limiting participation of any person due to a Fair Housing Act prohibited basis?

The PHA has established a language translation line to allow employees to serve speakers of most of the world's spoken languages.

The Housing Choice Voucher Department holds several outreach educational programs for current and interested landlords in the Pawtucket, RI community. Many of these are held in the evenings and off-hours to accommodate day workers.

How has the PHA examined its programs to ensure nondiscrimination?

The PHA holds an annual Fair Housing educational review for housing staff. Fair Housing posters are displayed in all development and management offices.

Does the PHA currently rely on the 2020 State of RI Analysis of Impediments to identify impediments to fair housing choice? If not, what impediments to fair housing choice has the housing authority identified?

Yes, the PHA uses the 2020 State of RI Analysis of Impediments statistics for Pawtucket, especially the following:

Language Barriers

The City of Pawtucket needs to do a better job of translating its housing programs into other languages, including Spanish. The City is supportive of working with the State on this issue.

Access to Healthy Housing

This City requires property owners to comply with the State's Lead Hazard Mitigation Act.

Diversity on Boards

The Mayor of the City of Pawtucket routinely advertises for members of the public interested in serving on boards and commissions to express interest.

Question for Pawtucket Housing Authority Annual Plan FHEO Review 2024

How has the PHA addressed those impediments to fair housing choice given the available resources?

Language Barriers

In the City of Pawtucket, LEP Spanish speakers account for 7.97% and LEP Portuguese Creole account for 5.12% of the city population.

To better serve the needs of Pawtucket citizens, we employ several bilingual employees throughout all sectors of our operations to assist in interpretation and to provide written translation of English documents. Employees speak Spanish, Creole, and Portuguese.

The PHA has established a translation line to allow English-only speakers to converse fully with LEP applicants and residents.

Access to Healthy Housing

The PHA received a \$2,500,000 Hazard Grant Award which we used throughout the development to address radon, asbestos, and lead remediation.

Diversity on Boards

Recently appointed new PHA Board of Commissioner member to represent more women, people of color, and tenants.

Current Membership of our Board of Commissioners:

- Mary Bray, Chairperson
- Olga Torres, Vice Chairperson
- Beth Roberge, Chairperson
- Elaine Cruz, Commissioner
- Kevin Rabbit, Commissioner
- Robert Ricci, Commissioner
- George Kelley, Commissioner



AFFH FACT SHEET:

Pursuant to its authority under the Fair Housing Act, HUD has long directed program participants to undertake an assessment of fair housing issues—previously under the Analysis of Impediments (AI) approach, and following the effective date of the AFFH rule, under the new Assessment of Fair Housing (AFH) approach.¹ See <u>80 Fed. Reg.</u> <u>42283</u> (July 16, 2015).

The AFFH rule is a fair housing planning rule—the rule clarifies existing fair housing obligations for HUD program participants to analyze their fair housing landscape and set locally-determined fair housing priorities and goals through AFH. The regulations establish specific requirements for the development and submission of an AFH by program participants and the incorporation and implementation of the strategies and goals set in the AFH into subsequent planning documents, including consolidated plans and PHA Plans, in a manner that connects housing and community development policy and investment planning with meaningful actions that affirmatively further fair housing.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND GOALS

The approach established by the AFFH rule is designed to improve the fair housing planning process by providing data and greater clarity of the steps that program participants must undertake to assess fair housing issues and contributing factors, establish fair housing priorities and goals to address them, and take meaningful actions to ultimately affirmatively further fair housing. The AFFH rule defines the terms fair housing issue, contributing factor, and meaningful actions as follows:

FAIR HOUSING ISSUE: "means a condition in a program participants geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing." See 24 C.F.R. § 5.152

CONTRIBUTING FACTOR: "means a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Goals in an AFH are designed to overcome one or more contributing factors and related fair housing issues as provided in § 5.154." See 24 C.F.R. § 5.152.

MEANINGFUL ACTIONS: "means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity." See 24 C.F.R. § 5.152.

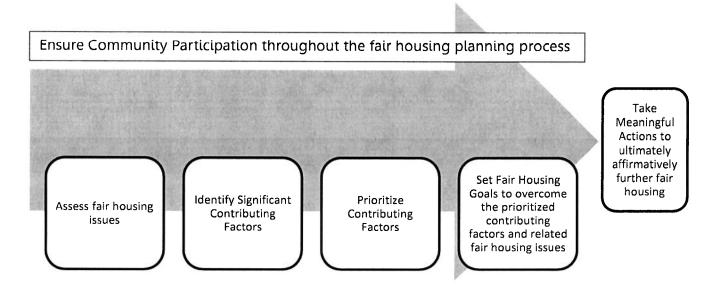
FAIR HOUSING PLANNING UNDER THE AFFH RULE

The intent of fair housing planning is to help program participants determine whether policies, practices, programs, and activities restrict fair housing choice and access to opportunity, and, if so, assess what factors are contributing to these barriers, and then develop a plan for addressing these restrictions. See 80 Fed. Reg. 42283 (July 16, 2015).

¹ Please note that "program participants" refers to the entities specified in § 5.154(b) of the AFFH rule (i.e., jurisdictions and insular areas that are required to submit consolidated plans and public housing agencies (PHAs) receiving assistance under sections 8 or 9 of the United States Housing Act of 1937).

The fair housing planning process that program participants must undertake includes:

- **1. Ensure Community Participation**. To ensure the AFH is informed by meaningful community participation, program participants must give the public reasonable opportunities for involvement throughout the AFH planning process, including in the development of the AFH and in the incorporation of the AFH into subsequent planning documents. See 24 C.F.R. § 5.158 and the Community Participation Fact Sheets.
- **2.** Assess Fair Housing Issues. Identify and discuss the fair housing issues affecting those protected under the Fair Housing Act, based on an assessment of HUD-provided data, local data, and local knowledge. See 24 C.F.R. § 5.154. These fair housing issues include, among others:
 - Ongoing local or regional segregation or lack of integration based on race, color, religion, sex, familial status, national origin, and disability within the jurisdiction and region;
 - Racially or ethnically concentrated areas of poverty (R/ECAPs) within the jurisdiction and region;
 - Significant disparities in access to opportunity for any protected class within the jurisdiction and region; and
 - Disproportionate housing needs for any protected class within the jurisdiction and region.
- **3.** Identify Contributing Factors. Identify significant contributing factors for the fair housing issues of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, disproportionate housing needs, and fair housing issues related to publicly supported housing, disability and access, and fair housing enforcement, outreach capacity, and resources. See 24 C.F.R. § 5.154(d)(3).
- **4. Prioritize Contributing Factors**. Prioritize such factors and justify the prioritization. In prioritizing such factors, program participants shall give highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance. See 24 C.F.R. § 5.154(d)(4).
- **5. Set Fair Housing Goals**. Set goals for overcoming the effects of contributing factors. For each goal, a program participant must identify one or more contributing factors that the goal is designed to address, describe how the overall goal relates to overcoming the identified contributing factor(s) and related fair housing issue(s), and identify the metrics and milestones for determining what fair housing results will be achieved. See 24 C.F.R. § 5.154(d)(4). To implement goals and priorities set in an AFH, strategies and action shall be included in program participants Consolidated Plans, Annual Action Plans, and PHA Plans (as applicable). See 24 C.F.R. §§ 5.152 and 5.154.



FAIR HOUSING GOALS LEAD TO STRATEGIES, ACTIONS, AND FAIR HOUSING OUTCOMES

The AFFH rule affords program participants considerable choice and flexibility in formulating goals and priorities to achieve fair housing outcomes. While the fair housing outcomes will vary based on local context and decision making, the fair housing planning process outlined above, in the AFFH rule, and within the AFH must be followed. Fair housing goals must be contained in the AFH; must include metrics, milestones, and timeframe for achievement; and must be explicitly incorporated into subsequent planning documents. Strategies and actions to implement the goals shall be included in the program participant's subsequent planning documents. This means that strategies and actions consistent with the goals contained in the AFH must be stated in the Consolidated Plan, PHA plan, and Annual Action Plans. Incorporating fair housing goals into these existing planning processes, which, in turn, incorporate fair housing strategies, actions, and priorities into housing and community development decision making promotes achieving fair housing outcomes. See 80 Fed. Reg. 42273 (July 16, 2015).

Take Meaningful Action. Using the goals set in the AFH, the program participant must take meaningful actions to affirmatively further fair housing. Taking meaningful actions means taking significant actions that are designed and can reasonably be expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity. See 24 C.F.R. § 5.152. Ultimately, program participants must take meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.

The outcomes that HUD seeks from this rule are those intended by the Fair Housing Act—overcoming historic patterns of segregation, promoting fair housing choice, and fostering inclusive communities that are free from discrimination. See 80 Fed. Reg. 42348 (July 16, 2015). HUD is not mandating specific outcomes for the planning process. See 80 Fed. Reg. 42288 (July 16, 2015). Instead, recognizing the importance of local decision making, the new AFH process establishes basic parameters and helps guide public sector housing and community development planning and investment decisions to fulfill the obligation to affirmatively further fair housing. See 80 Fed. Reg. 42288 (July 16, 2015).

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A.1 Availability of Information.

PHA Plans and Policies are available to the public at each AMP location and the central office of the PHA.

- Fogarty Manor (Main Office), 214 Roosevelt Avenue, Pawtucket, RI
- Kennedy Manor, 175 Broad Street, Pawtucket, RI
- St Germain Manor, 415 Mineral Spring Avenue, Pawtucket, RI
- Burns Manor, 105 Park Street, Pawtucket, RI
- Galego Court, 439 Weeden Street, Pawtucket, RI

The PHA Annual Plan is also available electronically at the PHA website: **www.pawthousing.org**

Units Designated for Elderly or Disabled Families [24 CFR 945]

The PHA may designate projects or portions of a public housing project specifically for elderly or disabled families. The PHA must have a HUD-approved allocation plan before the designation may take place.

Among the designated developments, Fogarty Manor and Burns Manor, the PHA must also apply any preferences that it has established. If there are not enough elderly families to occupy the units in a designated elderly development, the PHA may allow near-elderly families to occupy the units [24 CFR 945.303(c)(1)]. Near-elderly family means a family whose head, spouse, or cohead is at least 50 years old, but is less than 62 [24 CFR 5.403].

If there are an insufficient number of elderly families and near-elderly families for the units in a development designated for elderly families, the PHA must make available to all other families any unit that is ready for re-rental and has been vacant for more than 60 consecutive days [24 CFR 945.303(c)(2)].

The decision of any disabled family or elderly family not to occupy or accept occupancy in designated housing shall not have an adverse affect on their admission or continued occupancy in public housing or their position on or placement on the waiting list. However, this protection does not apply to any family who refuses to occupy or accept occupancy in designated housing because of the race, color, religion, sex, disability, familial status, or national origin of the occupants of the designated housing or the surrounding area [24 CFR 945.303(d)(1) and (2)].

This protection does apply to an elderly family or disabled family that declines to accept occupancy, respectively, in a designated project for elderly families or for disabled families, and requests occupancy in a general occupancy project or in a mixed population project [24 CFR 945.303(d)(3)].

PHA Policy

The PHA also has obtained HUD approval and designated Fogarty and Burns Manor as "elderly only" developments.

De-concentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be in included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

PHA Policy

The PHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

PHA Policy

The PHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level or 30 percent of median income, whichever number is higher).

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will follow the deconcentrating requirement, and no further action is required.

Order of Selection [24 CFR 960.206(e)]

The PHA system of preferences may select families either according to the date and time of application or by a random selection process.

PHA Policy

Families will be selected from the waiting list based on preference. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA.

When selecting applicants from the waiting list, the PHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The PHA will offer the unit to the highest-ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.

Factors such as deconcentrating or income mixing, and income targeting will also be considered in accordance with HUD requirements and PHA policy.

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B.3 Progress Report on Mission and Goals in PHA 5-Year and Annual Plan

Mission:

For over 85 years, the Mission of the Pawtucket Housing Authority has been to provide safe, decent, and affordable housing and to establish programs that will educate, enhance, and empower the lives of all the people in the community we serve.

We accomplish this through our mission branches:

Maintain and improve our supply of diverse, affordable, and accessible housing. Increase our communication efforts with residents and the Pawtucket Community. Enhance and expand relationships with our community, state, and HUD partners. Provide a stimulating working environment for employees. Continue to maintain our financially sound practices.

Progress:

The Housing Authority continues to partner with the State of Rhode Island, the City of Pawtucket, and community partners in running an Emergency Shelter located at 1139 Main Street. We are working with "Open Doors" shelter vendor to address the growing number of unsheltered within the City.

The Housing Authority continues to utilize a Waiting List preference for housing for chronically homeless veterans and families. During the current FY 2023, thirteen (13) formerly homeless families have been housed between our Housing Choice Voucher (6) program and Public Housing Program (7). Two more are pending approval. The PHA has requested five additional referrals for our ESG program for them to eventually transition over to HCV. In the preceding year, the PHA housed a total of twenty formerly homeless in HCV and Public Housing.

The Housing Authority's 28-unit LIHTC development, to preserve affordable apartments in the City of Pawtucket, currently has seven (7) project-based housing vouchers and twelve (12) housing choice vouchers within this development.

Last year, the Housing Authority was awarded funding from the City of Pawtucket through the Community Development Block Grant (CSBG) for upgrades to the Galego Court Playground. We are pleased to announce that this money was well spent with a brand-new basketball court, outdoor lighting, and new fencing.

FY April 1, 2024, to March 31, 2025 HUD Form 50075-HP

The Housing Authority has been awarded funding from Rhode Island Housing to pilot the conversion of two off-line units into refurbished apartments using the latest green and sustainable building materials. The Authority's plan is to study the feasibility of returning at least twenty-four off-line units into viable apartments for future use.

We continue to address residents needs through these additional resources will assist with creating an environment that is healthy and inviting of the public housing developments .

The Housing Authority continues to reach out and educate our Housing Choice Voucher HCV participants for our HCV Homeownership program. We accomplish this through our FSS Program and HCV participant who enquire about homeownership is sent a homeownership packet.

The Housing Authority participates in the PHARI committee and continues the collaboration with other local public housing agencies to create efficiencies through shared administrative functions such as inspections and waiting lists.

FY April 1, 2024, to March 31, 2025 HUD Form 50075-HP

Administrative, Public Housing and HCV Program Improvements

The PHA has focused on the coming changes to the PHA from the implementation of both HOTMA and NSPIRE.

Most importantly, the Housing Authority has issued an RFP to solicit proposals for a new Housing Authority Management and Accounting Software. We are looking diligently into finding robust software that will manage both the technological and regulatory demands of our housing authority. This will be a major investment of time and money for the Housing Authority.

Both Public and HCV Housing staff have attended several training courses and conferences on the HOTMA changes.

HCVP and Public Housing staff attended trainings: Housing Opportunity Through Modernization Act of 20146 (HOTMA) training to review the new changes HUD requires PHA's to implement by January 1, 2025 that affects income calculation, reviews and program eligibility; Veterans Affairs Supportive Housing (VASH) Training to improve the coordination and collaborations for increased utilization for HUD-VASH vouchers; The Basics of Trauma Informed Care training that reviewed principles of a trauma informed approach to those we serve; VMS training to ensure proper reporting to HUD.

The NSPIRE changes have been implemented by the authority for all repairs and inspections.

The PHA is reviewing both the HCV Administrative Plan and PH ACOP to address HOTMA and NSPIRE updates and changes affecting the housing programs.

The Authority continues its website improvements to ensure that residents of the community have 24 hours access to forms related to programs and applications for all related programs and services.

The PHA has established a robust Safety Committee that partners closely with our insurance carriers to improve tenant and worker safety. The Committee meets monthly and conducts a safety walkthrough at one facility monthly on a rotating basis. All Staff:

- Fire Safety and Evacuation procedures conducted by the City Fire Marshall's office
- Active Shooter training for all staff
- Annual CPR certification for certain staff

FY April 1, 2024, to March 31, 2025 HUD Form 50075-HP

Public Housing Maintenance staff specific training conducted by Beacon Mutual Insurance Company:

- Personal Protective Equipment
- Blood Borns Pathogens
- Hazardous Materials Safety
- Ladder Safety
- Lock out / Tag out
- Defensive Driving
- Slip and Fall Prevention
- Electrical Safety

Public Housing Residents:

- Identity and Scam seminar given by the RI Attorney General's Office
- Kitchen Fire and Building Security pamphlets distributed to high rise residents

The Housing Choice Voucher Program received 100% on SEMAP and received a "High Performer" designation. The Public Housing also received a "High Performer" designation.

Attained the services of an affordable housing firm, The Nelrod Company, to perform the Rent Reasonable study on an ongoing basis to allow for up-to-date comparable to provide better opportunities for program participants to find a unit to lease and to meet the SEMAP requirements.

Revamped and updated forms and processes used for the administration of the HCVP.

Utility allowances and payment standards increased to provide more opportunities to meet the high market rent demand in Pawtucket.

Revamped and updated forms and processes used for the administration of the HCVP.

Update the PHA's website to include valuable information and documentation to assist the public and program participants.

Provide employees with customer service training.

FY April 1, 2024, to March 31, 2025 HUD Form 50075-HP

Resident Services

The Resident Services Department was able to establish a Resident Services Committee at each site, consisting of two members per site.

The Department continues to expand resident participation and to look for new sources of grant monies to fund activities and received CDBG Funding for a Wellness Program.

Resident Services received ARPA funding to address housing needs with a Housing Navigator and an additional Resident Coordinator.

Resident Services implemented SASH (Support and Service at Home) to serve the aging population who want to age in place with services.

Security Department

Installed thirteen (13) additional cameras at our 40-42 Park Street residence. Installed an additional seven (7) cameras to the Fogarty Manor high rise exterior. The PHA is currently in the process of upgrading the tenant entrance call box system at St Germain Manor, Burns Manor, and Park Street. Several more camera projects are planned using capital funding.

Operations Department

The PHA continues to provide a strong safety workplace training program for the maintenance division.

The Operations Department was able to convert work orders and payroll information to electronic form, eliminating redundant paperwork and repetitive work.

Using NSPIRE guidelines, maintenance guidelines have been updated, including an emphasis on the Preventive Maintenance Plan.

The PHA continues improvements to landscaping and overall conditions of PHA community developments for enjoyment of residents, including holiday decorations as appropriate.

Leased Housing (HCVP) New Activities and Projects planned

Obtain new software to efficiently administer the HCVP and PH program. The software will include updates due to HOTMA.

Update the HCVP Administrative Plan to make policy changes to efficiently administer the HCVP and to implement the HOTMA changes.

FY April 1, 2024, to March 31, 2025 HUD Form 50075-HP

Implement changes by October 2024 to the inspection process based on the NSPIRE requirements set by HUD.

Implement changes by January 1, 2025 to the HCVP administration process based on the HOTMA requirements set by HUD.

Transfer HCVP program and participant files into a Secure Electronic File System.

Create an efficient process to ensure the proper information is being reported in VMS and PIC.

Collaborate with local agencies to provide services to HCVP participants that the PHA is not able to provide.

Review the application/selection process, implement an efficient process to issue, and utilize more HCV's.

Perform landlord outreach to provide resources for HCV participants.

Capital Planning

See Capital Budget handout.

December 04, 2023, 10:00AM Start -11:30 AM Finish

Kennedy Manor Community Room 175 Broad Street, Pawtucket 02860

PHA Staff Attendees:

Sheila Santos, Director of Public Housing Marilyn daPonte, Director of Leased Housing Celia Milios, Director of Finance Chris Bostic, Director of Operations Michael Pavia, Director of Security Kimberly Gervais, Director of Resident Services Alissa Stipa, Capital Projects Coordinator

Resident Advisory Board (RAB)

Susan Proulx, Kennedy Manor # G9 Robert Ferreira, Kennedy Manor # A-15 Cheryl Ann Page, Burns Manor # A-210

Absent: Debrease King, HCV Tenant Elsa Field, Fogarty Manor #520 Ida Abujade, Fogarty Manor #230 Ruth Madsen, HCV Tenant Gary Sabourin, Burns Manor # B-210 Johanna Lopez, Galego Court # 190-1C

Sheila Santos, Director of Public Housing, began the meeting by introducing staff members, many of whom are familiar with the tenants. The tenants were allowed the opportunity to introduce themselves, and to share a positive note about the Pawtucket Housing Authority.

Sue Prolux began by saying she has been a tenant for 14 years and appreciates everything the staff does every day.

Cheryl Ann Page, a tenant at Burns manor, was positive about her experience as a resident. She could not say enough positive things about her Property Manager and the maintenance staff. She briefly remarked that she was concerned that the outside landscaping contractor did not seem to clean up the leaves. Chris Bostic, Operations Director said he would address her comments in more detail.

Robert Ferreira said he was glad to be asked to join the board this year.

Director Santos explained the purpose of the PHA Annual Plan: in basic terms, it outlines what a public housing authority has done, is doing, and what will be doing for the next five years to come. The actual

document is a government/technical oriented narrative required by HUD For every public housing authority.

Progress Report on Mission and Goals in PHA 5-Year and Annual Plan

The Authority's mission was explained to the RAB which is to maintain and improve our supply of diverse, affordable, and accessible housing, while increasing our communication efforts with the residents and the Pawtucket community at large. using an established non-profit which the Authority can use to create housing opportunities to apply for federal and state grants, and to provide social services for our population.

PHA 85th Anniversary

A special announcement was made that in 2024, the PHA will be celebrating its 85th anniversary year. A celebration dinner is planned in honor of all who have served throughout the years and currently, along with several community and city dignitaries.

Award Funding from the State of Rhode Island

Exploring the potential for third floor units to be brought back online with the use of the Fair Cloth allocated by HID. The PHA currently has access top 24 Fair Cloth units.

Award Funding from the State of Rhode Island

Rehabilitate two units utilizing green technology and sustainable materials at Galego Court. This work will bring two additional units online at Galego Court.

Centralized Inventory System

The PHA is repurposing a building at Galego Court to serve as the PHA's central warehouse for inventory and to accommodate some of the Resident Staff.

PHA, City, State of RI, and Open Doors Partnership

The PHA continues its partnership with the City, the State of RI and "Open Doors" providing temporary shelter to the most vulnerable unhoused population of the City of Pawtucket.

The meeting continued with recaps from every department and future endeavors.

Public Housing Department

Director Sheila Santos spoke of her departments goals and accomplishments

Director Santos spoke of the changes coming to public housing under the new HOTMA regulations. These were briefly explained to the RAB.

The new NSPIRE standards for public housing was discussed as it applies to future unit and development inspections. The members were advised that PH staff, including maintenance staff, have attended several training courses and conferences to learn both HOTMA and NSPIRE.

In conjunction with these major changes, it was explained that the PHA is sending out a Request for Proposal for new housing software. The importance of having current and robust software to handle future technological changes is paramount.

The software conversion was listed as a major event for the PHA as every department will have a role to play and all staff will need comprehensive training.

Comments

All three residents were pleased that the PHA has been operating for 85 years as so many need this housing in the city.

Resident Proulx and Ferreira commented that it was good foresight on the PHA's part to keep up with the government changes.

Security Department

Director Mike Paiva spoke of his departments goals and accomplishments.

The Pawtucket Housing Authority (PHA) Security Department directive is to preserve public peace and order, and to protect life and property. Our department is responsible for investigations into all developments, conducting background, credit, and criminal history checks on all applicants, as well as fraud investigations.

Several initiatives have been implemented within this past year such as installing thirteen (13) additional Rhombus security cameras at one of our facilities located at 40-42 Park St.

We also installed seven (7) additional Rhombus security cameras throughout the exterior of the facility grounds at Fogarty Manor located at 214 Rosevelt Ave.

The Keri system (access control) at two other facilities specifically Burns Manor and St. Germain Manor is in the process of being replaced and upgraded.

Several security features were also added to the entrance way located at Fogarty Manor. These features include a ring camera for the receptionist to view and speak to visitors seeking to gain access to H.Q. One ring camera was installed outside of the executive director's and finance office monitoring visitors requesting access.

Director Paiva concluded his presentation with future projects.

Galego Court - replacing all cameras currently in place and installing new interior cameras throughout our largest facility (Fogarty Manor). Cameras for Burns Manor and St. Germain Manor as both these systems have now become antiquated and are overdue for upgrades.

Pawtucket Housing Authority Resident Advisory Board (RAB)

Installation of thirty-three (33) new Rhombus cameras throughout stairwells and laundry rooms at Kennedy Manor. These cameras will allow PHA management to monitor activity 24 hours a day ensuring all blind spots are covered.

All listed projects have been put into the 5-year capital funding plan accordingly.

Replace and install a new black fence in front of Kennedy Manor on the Broad St. entrance way to better deter loiterers from entering facility grounds and trespassing

Comments

Resident Page asked if the cameras at Burns Manor move / swivel as she was concerned about the recent thefts of catalytic converters from cars on the premises.

These cameras are static, but photographic information is provided to Pawtucket Police.

Resident Ferreira asked if the white wood bench could be removed or relocated from the generator area as homeless congregate there late at night and leave trash around. He helps to clean it up.

PHA responded that they will act on the bench.

Resident Proulx asked if the smoking hut will be insulated.

PHA responded that it will not be insulated due to fire hazard

Resident Ferreira suggested that residents sit at the front lobby desk at Kennedy Manor during workday hours to screen visitors entering the lobby. He said if they encounter resistance, they can go to the security office.

PHA responded that they will research the suggestion.

Housing Choice Voucher Program

Director Marlyn daPonte spoke of her departments goals and accomplishments

Streamlining the on-line access to documents and processing forms for HCV clients is a priority for the HCV department.

Director daPonte also spoke about the sweeping changes of HOTMA and our need for updated software to manage these changes seamlessly.

Director daPonte concluded by saying they are always looking for new ways to get Pawtucket landlords interest in joining the HCV program but can be challenging due to the high rents in the area.

Comments

Resident Page expressed that it is good to keep the on-line information simple to use and understand for residents.

Finance Department

Director Celia Milios spoke of her departments goals and accomplishments

Director Milios started by saying that she is new to the position having taken over from the previous finance director who retired.

Director Milios explained that her department acts as the pivotal point that serves all areas of the PHA and works to serve each in their capacity. They deal mostly with internal functions for banking, auditing, grants, bill paying, and payroll.

The PHA housing software upgrade and RFP were touched upon as accounting and finance will have their own challenges in training and implementing.

Comments

Resident Ferreria said he understood these financial challenges as he worked for McDonald's Corporation for 35 years.

Operations Department

Director Chris Bostic spoke of his departments goals and accomplishments

Director Bostic stated that he started in his position in May of 2023 and has implemented several organization improvements. He explained that he oversees the maintenance and capital improvements units of the PHA.

Director Bostic circled back to Resident Page's concerns about the leaves not being picked up prior to the freezing weather causing tripping hazards. He stated that the final fall clean ups were occurring last week and this week. In addition, he has instructed site personnel to make ground and leave cleanup part of their morning daily routine.

Director Bostic handed out a summary sheet titled Operations/Capital Improvements and his Projected Goals. (see attached).

Comments

Resident Ferreria asked what can be done about tenants who do not clean their units, do not report bed bugs, and urinate in trash cans.

The PHA responded that we take a two-pronged approach. We use Resident Services to reach for services that may be needed, while at the same time, our Property Managers take a stronger stance with lease enforcement and legal action to bring about compliance.

Resident Page wanted to make the PHA aware that many residents are receiving packages from foreign countries and could contain pests on them.

Pawtucket Housing Authority Resident Advisory Board (RAB)

Resident Ferreira asked if we could have better communication with tenants about reporting bed bugs and other pests when they have them. He acknowledged that some do not understand but frustrated some do not want to cooperate.

The PHA responded that they would make efforts to improve communication and work in conjunction with Resident services in getting the work out.

Resident Ferreira talked about the deteriorating sidewalks that surround many of the properties, especially Kennedy Manor where numerous tenants use wheelchairs, canes, and walkers. He himself lost a wheel off his wheelchair when it became stuck in the cracked concrete. The city, state and Amtrak Trains have closed off a substantial portion of the sidewalk area, so he was not sure if that is why repairs are lacking.

The PHA said they would investigate if the City of Pawtucket Public Works could assist. It was mentioned however that this may be State of Rhode Island road property, at least at the front.

Resident Services

Director Kim Gervais spoke of her departments goals and accomplishments

The Director started out by speaking of her staff and what each person brings to her department. She reviewed the sites they worked at and what their specialty is .

Director Gervais stated that her department was able to establish a Resident Services Committee at each site, consisting of two members per site.

Director Gervais said her department is looking to expand resident participation in the activities being offered and that she is continually looking for new sources of grant monies to fund activities.

The department prepares a calendar of events that goes out to each resident monthly to keep them informed of PHA happenings.

Comments

Resident Ferreira said he appreciated the challenging work by the Resident Services department. He understands that you have great programs but sometimes people just do not show up.

Resident Ferreira suggested to the PHA to contact businesses like McDonalds Corporation who are always looking to donate to worthy causes in the community.

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

I, Donald R. Grebien, the Mayor,

certify that the **Annual PHA Plan for fiscal year 2024** of the Housing Authority of the City of Pawtucket is consistent with the Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the City of Pawtucket, Rhode Island, pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The PHA Plan is consistent with the City of Pawtucket Consolidated Plan to maintain and upgrade affordable housing, increase the availability of affordable housing, and decrease impediments to affordable housing within the City of Pawtucket, Rhode Island.

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

Name of Authorized Official:	Title:
Donald R. Grebien	Mayor
Signaturen	Date: 12/21/23

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. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the _____ 5-Year and/or __X_ Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 04/01/2024, in connection with the submission of the Plan and implementation thereof:

- 1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
- 2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
- 3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
- 4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
- 5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
- 6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the grogram in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
- 7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.
- 8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
- 9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
- 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
- The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
- 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

The Housing Authority of the City of Pawtucket, RI PHA Name

RI002 PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 2024

_ 5-Year PHA Plan for Fiscal Years 20____ - 20____

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

Signature	Date	Signature Many Bray	01/17/2024 Date
Paula McFarland Dauba McForst	1/8/24	Mary Bray	1 1
Name of Executive Director		Name Board Chairman	

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning **04/41/2024** in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.

The Housing Authority of the City of Pawtucket PHA Name

RI002 PHA Number/HA Code

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

24 01/17/2024	/
Signature Mary Bray Date	
	24 Signature Mary Bray Date

The United States Department of Housing and Urban Development is authorized to collect 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. The information is collected to ensure that PHAs carry out applicable civil rights requirements. Public reporting burden for this information collection is estimated to average 0.16 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.

STATEMENT OF SIGNIFICANT AMENDEMENT TO THE CAPITAL FUND PROGRAM BUDGETS AND PHA PLAN

The Pawtucket Housing Authority's definition of a "significant amendment" or "substantial deviation" is a significant change adversely affecting an applicant or resident family to our ACOP policy or Section 8 Administration Plan. For the Capital Fund Program is a 25% change in our Capital Fund Budget or the addition of any non-emergency work item that is not already included in the Pawtucket Housing Authority's latest Capital Fund Program Budget or Five-Year Budget shall be considered a significant amendment change to the PHA Plan.

Sandame Fond O

Paula McFarland

Executive Director Pawtucket Housing Authority

1824 Date

Capital Fund Program (CFP) Amendment Annual Contributions Contract Terms and Conditions (HUD-52840-A)

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing

The information collection requirements contained in this document have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2577-0075. There is no personal information contained in this application. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when disclosure is not required. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

Whereas, (Public Housing Authority) Housing Authority of the City of Pawtucket RI002 (herein called the "PHA") and the United States of America, Secretary of Housing and Urban Development (herein called "HUD") entered into an Annual Contributions Contract ACC(s) Numbers(s) (On File) dated (On File)

Whereas, in accordance with Public Law 117-328, Division L, Title II,

Whereas, HUD has agreed to provide CFP assistance, upon execution of this Amendment, to the PHA in the amount to be specified below for the purpose of assisting the PHA in carrying out capital and management activities at existing public housing projects in order to ensure that such projects continue to be available to serve low-income families. HUD reserves the right to provide additional CFP assistance in this FY to the PHA. When HUD provides additional amounts, it will notify the PHA and those amended grants will be subject to these terms and conditions.

\$2,315,644.00 for Fiscal Year 2023 to be referred to under the Capital Fund Grant NumbeRI01P00250123 PHA Tax Identification Number (TIN): On File UEI Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number On File

Now Therefore, the ACC is amended as follows:

1. The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for capital and management activities of PHA projects. This CFP Amendment is a part of the ACC.

2. The PHA must carry out all capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) as well as other applicable HUD requirements, except that the limitation in section 9(g)(1) of the Act is increased such that of the amount of CFP assistance provided for under this CFP amendment only, the PHA may use no more than 25 percent for activities that are eligible under section 9(e) of the Act only if the PHA's HUD-approved Five Year Action Plan provides for such use; however, if the PHA owns or operates lessthan 250 public housing dwelling units, such PHA may continue to use the fullflexibility in accordance with section 9(g)(2) of the Act.

3. The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment to the Capital Fund Five Year Action Plan.

4. For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.

5. Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(j)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(j)(5) of the Act starts with the effective date of this CFP amendment (the date on which CFP assistance becomes available to the PHAfor obligation). Any additional CFP assistance this FY will start with the same effective date.

6. Subject to the provisions of the ACC(s) and paragraph 3, and to assist in capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.

7. The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. Provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.

8. The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law.HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.

9. Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s).

(mark one) :	Yes	N	° L

10. The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.

11. If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements. For total conversion of public housing projects, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For partial conversion, the PHA shall continue to operate each non-converted public housing project as lowincomehousing in accordance with paragraph 7.

12. CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure timeperiod. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall bethe date on which such funding becomes available to the PHA for obligation. The PHA must have a recorded and effective Declaration(s) of Trust on all property funded with Capital Fund grants (all types) or HUD will exercise all available remedies including recapture of grant funding.

The parties have executed this CFP Amendment, and it will be effective on the date HUD signs below.

U.S. Dept of HUD		PHA (Executive Director or authorized agent)	
By /s/	Date: 02/17/2023	By Paula McFarland	Date:
			1010172
Marianne Nazzaro		Sacri	91100
Title: Deputy Assistant Secretary		Title	,
Office Public Housing Investments		Executive Director	\bigcap
Previous versions obsolete		form HUD-52840-A OMB Approval No.2577-00	75 (exp. 08/31/2023)

us versions obsolete

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Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352 0348-0046				
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Prime Subawardee		and Address of		
Tier, <i>if known</i> :		The Housing Auth 214 Roosevelt Ave Pawtucket, RI 028		wtucket
Congressional District, if known	ו:	Congressional	District , <i>if known</i> :	
6. Federal Department/Agency:			m Name/Descripti	ion:
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subject to a civil penalty of not less that \$10,000 and not more than \$100,000 for each such failure.		Telephone No.:40		Date: <u>5/18/23</u>
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Public Meeting Notice

The Housing Authority of the City of Pawtucket's Annual Plan beginning April 2024 will be available for Public Review and Comment.

The Plan is available at the Authority's following offices:

- Administrative Office, 214 Roosevelt Avenue, Pawtucket, RI
- Galego Court Development Office, 483 Weeden Street, Pawtucket, RI
- Kennedy Manor Development Office, 175 Broad Street, Pawtucket, R
- St. Germain Manor Development Office, 401 Mineral Spring Avenue, Pawtucket, RI
- Burns Manor Development Office, 95 Park Street, Pawtucket, RI

The Public Meeting to review comments and changes will be held on Tuesday, December 19, 2023, at 10:00 A M. at the Community Room at Kennedy Manor, which is located at 175 Broad Street, Pawtucket, RI.

Comments are due to the Authority by 1:00 P.M. on Friday, December 15, 2023, at the above address or via email to the attention of Paula McFarland, Executive Director, <u>pmcfarland@pawthousing.org</u>.

