

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

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# PHA Plans

Annual Plan for Fiscal Year 2001

**NOTE: THIS PHA PLANS TEMPLATE (HUD 50075) IS TO BE COMPLETED IN ACCORDANCE WITH  
INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICES**



**PHA Plan  
Agency Identification**

**PHA Name:** The Housing Authority of the City of Providence

**PHA Number:** RI001

**PHA Fiscal Year Beginning:** 07/2001

**Public Access to Information**

**Information regarding any activities outlined in this plan can be obtained by contacting:  
(select all that apply)**

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices

**Display Locations For PHA Plans and Supporting Documents**

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government
- Public library
- PHA website
- Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- Main business office of the PHA
- PHA development management offices
- Other (list below)

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## Annual PHA Plan PHA Fiscal Year 2001

[24 CFR Part 903.7]

### **i. Annual Plan Type:**

Select which type of Annual Plan the PHA will submit.

**Standard Plan**

#### **Streamlined Plan:**

- High Performing PHA**
- Small Agency (<250 Public Housing Units)**
- Administering Section 8 Only**

**Troubled Agency Plan**

### **ii. Executive Summary of the Annual PHA Plan**

[24 CFR Part 903.7 9 (r)]

Provide a brief overview of the information in the Annual Plan, including highlights of major initiatives and discretionary policies the PHA has included in the Annual Plan.

The following Annual Plan for The Housing Authority of the City of Providence outlines policies and procedures covered in several PHA handbooks and manuals. The following pages along with these supporting documents comprise this plan. The Providence Housing Authority has also recently developed an additional comprehensive strategic plan. The needs assessment phase of this plan included focus groups with residents from each of our developments as well as the Section 8 program; survey responses from approximately 975 conventional public housing development heads of household, 180 youth, 650 Section 8 residents and landlords, 90 scattered site residents and 110 neighbors of scattered sites as well surveys of external and internal stakeholders, all PHA employees, commissioners, and extensive environmental scanning activities. These activities assisted the PHA in preparing its HUD mandated Annual and Five Year plans. These plans were developed in consultation with a Resident Advisory Board that is comprised of both public housing and Section 8 residents.

This Annual plan addresses policies concerning housing needs for the city and those on our waiting lists; strategies to address these needs; PHA financial resources; policies governing eligibility, selection, admissions, occupancy, rent determination and grievance procedures in public and Section 8 housing as well as overall policies and procedures governing these programs. One example of these policies concerns admissions. In an effort to attract working families to help stabilize PHA communities the PHA has instituted a working preference whereby 25 percent of new residents admitted into family developments will be working or participating in a training activity.

Also addressed in this plan are capital improvements for the following year covering a wide range of improvements to PHA sites and dwelling structures such as landscaping activities, the a heating system upgrade at the Chad Brown Development, exterior renovations at Roger Williams, painting at Hartford Park, the reconfiguration of handicapped units at Dexter Manor, Kilmartin Plaza and Dominica Manor, a fire alarm upgrade at Carroll Tower, roof replacement at Parenti Villa and a great many additional items. (For greater detail and additional information please see the Capital Improvements section of this report.)

The PHA also plans to take advantage of regulations allowing PHA's to borrow against future Capital Fund monies. We hope to use this capitalization mechanism to build a new community center and facilities management central office at the Hartford Park development. These new facilities will replace existing facilities that are clearly inadequate. It is estimated that these activities will total approximately \$4,000,000.

Services addressed in this plan include a homeownership program that has already resulted in five former public housing residents owning their own homes; an ambitious Family Investment Center program that houses the Family Self-Sufficiency, World of Work, General Equivalency Diploma, English as a Second Language, Office Skills, and Providence Housing Authority Summer Enrichment programs. Other programs available to residents in our family developments include the Public Housing Drug Elimination Program that includes youth substance abuse prevention education, youth health and pregnancy prevention education, academic assistance, computer resource centers, enrichment classes (art, music, dance etc.), a Youth Service Council for teens, organized sports, a Family Advisory Council and a parent volunteer program.

For those living in the PHA's elderly and elderly/disabled developments the PHA offers health & wellness centers at three developments, clinical practicum for nursing students, a congregate nutrition lunch program, certified resident service coordinators, supportive services for frail residents, housekeeping assistance, transportation services, bus trips and various on-site recreational activities.

The PHA also hopes to demolish 32 vacant units of housing in its Hartford Park development. These units were replaced in a previous modernization and development plan and are rapidly deteriorating. Further, these buildings create a situation of highly dense housing with little open space or parking available. Currently a court order prevents the PHA from disposing of these buildings. The PHA also hopes to develop 50 units of low income housing at the Roger Williams development site.

All of these separate elements are brought together in this Annual Plan that illustrates the Providence Housing Authority's commitment to providing the highest level of services in the most efficient and effect manner possible. The values behind the development of this plan are expressed in the PHA's newly revised mission statement that is included below:

**Mission Statement of the Housing Authority of the City of Providence:**

The Providence Housing Authority exists to develop and maintain decent, safe and sanitary housing and to address the economic and social needs of residents. The Providence Housing Authority is committed to high standards of public accountability and continuous improvement through management excellence, professional development and customer satisfaction.

***Elements of the Mission:***

- 1. To develop and maintain decent, safe and sanitary housing***
- 2. To address the economic and social needs of residents***
- 3. To ensure the adequacy and vitality of the city's affordable housing supply***
- 4. To maintain public confidence in the Authority's operations***
- 5. To assess and improve agency, program and employee performance***

**iii. Annual Plan Table of Contents**

[24 CFR Part 903.7 9 (r)]

Provide a table of contents for the Annual Plan, including attachments, and a list of supporting documents available for public inspection.

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**Attachments**

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

## Required Attachments:

<input checked="" type="checkbox"/>	Admissions Policy for De-concentration (attached)	79
<input checked="" type="checkbox"/>	FY 2001 Capital Fund Program Annual Statement (attached in main body of report)	48
<input type="checkbox"/>	Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)	
<input checked="" type="checkbox"/>	Statement of Progress for the PHA's Five-Year Plan	<b>(ri001c01)</b>
<input checked="" type="checkbox"/>	Community Service Requirement Statement	81
<input checked="" type="checkbox"/>	Pet Policy Statement	83
<input checked="" type="checkbox"/>	Residents on the Resident Advisory Board	85

- Residents on the Providence Housing Authority’s Governing Board  
85

Optional Attachments:

- PHA Management Organizational Chart (attached) 77
- FY 2000 Capital Fund Program 5-Year Action Plan (ri001b01)
- Public Housing Drug Elimination Program (PHDEP) Plan (ri001a01)
- Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text) 72
- Other (List below, providing each attachment name)
- Plans to Address Items from the Real Estate Assessment Center Customer Satisfaction Survey 87
- Capital Fund Annual Statement/Performance & Evaluation Report 93
- Comments from Public Meeting & PHA Response 111

**Supporting Documents Available for Review**

Indicate which documents are available for public review by placing a mark in the “Applicable & On Display” column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies



<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
X	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
N/A	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
X	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
N/A	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
N/A	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
X	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
N/A	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the	Annual Plan: Conversion of Public Housing

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
	1996 HUD Appropriations Act	
X	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
N/A	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
X	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
X	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
X	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
N/A	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

## 1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

### A. Housing Needs of Families in the Jurisdiction/s Served by the PHA

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the "Overall" Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being "no impact" and 5 being "severe impact." Use N/A to indicate that no information is available upon which the PHA can make this assessment.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	26,819	5	4	4	3	4	4
Income >30% but <=50% of AMI	16,694	4	4	4	3	3	3
Income >50% but <80% of AMI	12,972	4	3	2-3	3	3	3
Elderly	18,094	4	2	2	2	2	2
Families with Disabilities	9,349	3	3	2	2	2	2
White	26,880	4	3-4	3	2	2	3
African American	5,745	4	3-4	3	2	2	3
Native American	341	4	3-4	3	2	2	3
Asian	1,585	4	3-4	3	2	2	3
Hispanic	5,504	4	3-4	3	2	2	3

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- Consolidated Plan of the Jurisdiction/s  
Indicate year: 1995, 2000
- U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset (1990, 1993)
- American Housing Survey data  
Indicate year:
- Other housing market study  
Indicate year:
- Other sources: (list and indicate year of information)

Providence Department of Planning and Development

Housing Database: RI Dept. of Administration, Division of Planning. Feb 1996.

## B. Housing Needs of Families on the Public Housing and Section 8 Tenant-Based Assistance Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/>	Section 8 tenant-based assistance		
<input checked="" type="checkbox"/>	Public Housing		
<input type="checkbox"/>	Combined Section 8 and Public Housing		
<input type="checkbox"/>	Public Housing Site-Based or sub-jurisdictional waiting list (optional)		
If used, identify which development/sub jurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	437		400
Extremely low income <=30% AMI	35	8%	
Very low income (>30% but <=50% AMI)	393	90%	
Low income (>50% but <80% AMI)	9	2%	
Families with children	177	40.50%	
Elderly families	61	13.96%	
Families with Disabilities	199	45.54%	
White	339	77.57%	
African American	82	18.76%	
Hispanic	247 <sup>1</sup>	56.52%	
Native American	8	1.83%	
Asian	8	1.83%	
Other	0	0%	
Characteristics by Bedroom Size (Public Housing Only)			
0 BR	157	35.93%	103%
1BR	74	16.93%	101%
2 BR	107	24.49%	34%
3 BR	63	14.42	30%
4 BR	32	7.32%	37%
5 BR	4	1.0%	67%
5+ BR	0	0.0%	N/A

<sup>1</sup> Hispanic Figures are included within the figures for other races and are thus double counted.

<b>Housing Needs of Families on the Waiting List</b>
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Has been opened for pre-application process since 10/18/00. Previously the elderly/disabled and two bedroom waiting lists had been open. If yes: How long has it been closed? N/A Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes

<b>Housing Needs of Families on the Waiting List</b>			
Waiting list type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/sub-jurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	375 <small>(There are also 2,568 on a pre-application list)</small>	77%	24%
Extremely low income <=30% AMI	289 <small>(Not including pre-application list)</small>	77%	
Very low income (>30% but <=50% AMI)	86 <small>(Not including pre-application list)</small>	23%	
Low income (>50% but <80% AMI)	0 <small>(Not including pre-application list)</small>	0%	
Families with children	367 <small>(Not including pre-application list)</small>	98%	
Elderly families	8 <small>(Not including pre-application list)</small>	2%	
Families with Disabilities	19 <small>(Not including pre-application list)</small>	5%	
White	28	7%	
African American	118	32%	
Hispanic	199	53%	

Housing Needs of Families on the Waiting List			
Native American	10	3%	
Asian	2	1%	
Unknown	18	4%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	N/A	N/A	N/A
2 BR	N/A	N/A	N/A
3 BR	N/A	N/A	N/A
4 BR	N/A	N/A	N/A
5 BR	N/A	N/A	N/A
5+ BR	N/A	N/A	N/A
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: How long has it been closed? 27 months. Does the PHA expect to reopen the list in the PHA Plan year? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

**C. Strategy for Addressing Needs**

Provide a brief description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency’s reasons for choosing this strategy.

As illustrated in the following section of this plan the PHA seeks to address the housing needs of the City of Providence through the implementation of efficient and effective management. To this end we have implemented an aggressive five-year goals management plan. The PHA will also participate in the revision of the City’s Consolidated Planning process, which is currently in progress. Further, the PHA has implemented many social programs to assist our existing residents in their efforts to become employed and has instituted an employment preference to assist the working poor.

Those with disabilities will be served through efforts to modernize units based on the Section 504 needs assessment for public housing. These efforts have been built into our annual and five-year capital improvement plans.

Elderly residents have been served through the designation two high-rise developments, Dominica Manor and Carroll Tower as elderly only. The result has been a significant increase in the average age of residents at those developments.

The PHA also plans to take advantage of additional resources that may become available such as new Section 8 vouchers and will strive to ensure that our policies result in consistently high Section 8 lease up rates.

The PHA also hopes to expand the supply of affordable housing units through the development of 50 new low-income housing units at the Roger Williams development site located in the South Providence neighborhood.

The PHA’s housing strategies were selected with an understanding of the realities surrounding the low-income housing industry at this time. The PHA is aware that activities are necessarily constrained by funding levels and the

availability of other resources. Further, the City has been fortunate to have thirteen Community Development Corporations and agencies such as the Department of Planning and Development and the Rhode Island Housing and Mortgage and Finance Corporation which also address the housing needs of our community.

The PHA developed its current strategies as part of a larger strategic planning process.

The needs assessment phase of this strategic plan included focus groups with members of each of our developments as well as Section 8 residents; survey responses of approximately 975 conventional public housing development heads of household, 180 youth, 650 Section 8 residents and landlords, 90 scattered site residents and 110 neighbors of scattered sites as well surveys of external and internal stakeholders, all PHA employees, commissioners, and extensive environmental scanning activities. These activities assisted the PHA in preparing its HUD mandated Annual and Five Year plans. The annual and five-year HUD plans were developed in consultation with a Resident Advisory Board that is comprised of both public housing and Section 8 residents.

### **(1) Strategies**

#### **Need: Shortage of affordable housing for all eligible populations**

#### **Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:**

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

#### **Strategy 2: Increase the number of affordable housing units by:**

Select all that apply

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed - finance housing

- Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- Other: (list below)

**Need: Specific Family Types: Families at or below 30% of median****Strategy 1: Target available assistance to families at or below 30 % of AMI**

Select all that apply

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)

**Need: Specific Family Types: Families at or below 50% of median****Strategy 1: Target available assistance to families at or below 50% of AMI**

Select all that apply

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work
- Other: (list below)

**Need: Specific Family Types: The Elderly****Strategy 1: Target available assistance to the elderly:**

Select all that apply

- Seek designation of public housing for the elderly (Completed: Dominica Manor and Carroll Tower)
- Apply for special-purpose vouchers targeted to the elderly, should they become available
- Other: (list below)

**Need: Specific Family Types: Families with Disabilities****Strategy 1: Target available assistance to Families with Disabilities:**

Select all that apply

- Seek designation of public housing for families with disabilities
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available



- Affirmatively market to local non-profit agencies that assist families with disabilities  
 Other: (list below)

**Need: Specific Family Types: Races or ethnicities with disproportionate housing needs**

**Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:**

Select if applicable

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs  
 Other: (list below)

**Strategy 2: Conduct activities to affirmatively further fair housing**

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units  
 Market the section 8 program to owners outside of areas of poverty /minority concentrations  
 Other: (list below)

**Other Housing Needs & Strategies: (list needs and strategies below)**

**(2) Reasons for Selecting Strategies**

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- Funding constraints  
 Staffing constraints  
 Limited availability of sites for assisted housing  
 Extent to which particular housing needs are met by other organizations in the community (13 Community Development Corporations, Rhode Island Housing and Mortgage Finance Corporation, City of Providence Department of Planning and Development, etc.)  
 Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA  
 Influence of the housing market on PHA programs  
 Community priorities regarding housing assistance  
 Results of consultation with local or state government  
 Results of consultation with residents and the Resident Advisory Board  
 Results of consultation with advocacy groups  
 Other: (list below)

***Separate comprehensive strategic planning process.***

## 2. Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2001 grants)</b>		
a) Public Housing Operating Fund	6,159,405	
b) Public Housing Capital Fund-CGP	2,373,831	
c) HOPE VI Revitalization	-	
d) HOPE VI Demolition	-	
e) Annual Contributions for Section 8 Tenant-Based Assistance	18,740,014	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	320,641	
g) Resident Opportunity and Self-Sufficiency Grants	-	
h) Community Development Block Grant	-	
i) HOME	-	
Other Federal Grants (list below)		
<b>RI 43 ESC 00100598</b>	126,881	
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
RI 43 DEP0010198	382,992	Drug Prevention
RI 43 EDS50010296	113,157	Economic Supportive Services
RI 43 FiR0010194	195,000	Family Investment Center
RI 43 POO1 98, 99	3,871,331	Comp. Grant
<b>3. Public Housing Dwelling Rental Income</b>	5,394,179	Operation
<b>4. Other income (list below)</b>		
Interest Income	119,844	Operations
Other Operating Receipts	9,200	Operations
RI99 RS E001 P0153	33,333	Housing Helps
<b>5. Non-federal sources (list below)</b>		
Welfare to Work	342,406	Welfare to work
Wise-Up	17,500	Teen Pregnancy Prevention
RIOSAs	47,460	Elderly Social Services
<b>Total resources</b>	<b>38,247,224</b>	

### **3. PHA Policies Governing Eligibility, Selection, and Admissions**

[24 CFR Part 903.7 9 (c)]

#### **A. Public Housing**

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

##### **(1) Eligibility**

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- When families are within a certain number of being offered a unit: (state number)
- When families are within a certain time of being offered a unit: (within 6 months)
- Other: (describe)

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- Criminal or Drug-related activity
- Rental history
- Housekeeping
- Other (describe)

Prospective tenants must participate in a day long Preparation for Community Living/ Living Skills workshop prior to admission into public housing.

- c.  Yes  No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- d.  Yes  No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- e.  Yes  No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

##### **(2)Waiting List Organization**

a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)

- Community-wide list
- Sub-jurisdictional lists
- Site-based waiting lists
- Other (describe)

b. Where may interested persons apply for admission to public housing?

- PHA main administrative office
- PHA development site management office

Other (list below)

c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**

1. How many site-based waiting lists will the PHA operate in the coming year? N/A
2.  Yes  No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?  
If yes, how many lists? N/A
3.  Yes  No: May families be on more than one list simultaneously?  
If yes, how many lists? N/A
4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)? N/A
  - PHA main administrative office
  - All PHA development management offices
  - Management offices at developments with site-based waiting lists
  - At the development to which they would like to apply
  - Other (list below)

### **(3) Assignment**

a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (select one)

- One  
 Two  
 Three or More

b.  Yes  No: Is this policy consistent across all waiting list types?

c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA:

### **(4) Admissions Preferences**

a. Income targeting:

- Yes  No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income?

## b. Transfer policies:

In what circumstances will transfers take precedence over new admissions? (list below)

- Emergencies
- Overhoused
- Underhoused
- Medical justification
- Administrative reasons determined by the PHA (e.g., to permit modernization work)
- Resident choice: (state circumstances below)
- Other: (list below)  
Ratio of 5:1 when occupancy is below 97% and 1:1 when it is above 97%

## c. Preferences

1.  Yes  No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If "no" is selected, skip to subsection (5) Occupancy)
2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

- Working families and those unable to work because of age or disability (4:1 ratio)
- Veterans and veterans' families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

## 1 Date and Time

## Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

## Other preferences (select all that apply)

- (2) Working families and those unable to work because of age or disability (4:1 ratio)
- Veterans and veterans' families
- Residents who live and/or work in the jurisdiction
- (2) Those enrolled currently in educational, training, or upward mobility programs
- (2) Households that contribute to meeting income goals (broad range of incomes)
- (2) Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

## 4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

**(5) Occupancy**

## a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- The PHA-resident lease
- The PHA's Admissions and (Continued) Occupancy policy
- PHA briefing seminars or written materials
- Other source (list)

## b. How often must residents notify the PHA of changes in family composition? (select all that apply)

- At an annual reexamination and lease renewal
- Any time family composition changes
- At family request for revision
- Other (list)

**(6) Deconcentration and Income Mixing**

- a.  Yes  No: Does the PHA have any general occupancy (family) public housing developments covered by the deconcentration rule? If no, this section is complete. If yes, continue to the next question.
- b.  Yes  No: Do any of these covered developments have average incomes above or below 85% to 115% of the average incomes of all such developments? If no, this section is complete.

If yes, list these developments as follows:

<b>Deconcentration Policy for Covered Developments</b>			
<b>Development Name:</b>	<b>Number of Units</b>	<b>Explanation (if any) [see step 4 at §903.2(c)(1)(iv)]</b>	<b>Deconcentration policy (if no explanation) [see step 5 at §903.2(c)(1)(v)]</b>
Scattered Sites	247	<p>The Scattered Site units exceed the Established Income Range by an average of \$545 when the bedroom size adjustment calculation is factored in.</p> <p>The scattered site program has been an integral part of both the PHA's resident self-sufficiency and homeownership programs.</p> <p><i>And</i></p> <p>These developments are comprised of 247 scattered site units located city-wide. The placement of these units was designed to de-concentrate public housing and alleviate the concentration of low-income residents in specific developments and areas of the city.</p>	

**B. Section 8**

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.  
**Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

**(1) Eligibility**

- a. What is the extent of screening conducted by the PHA? (select all that apply)
  - Criminal or drug-related activity only to the extent required by law or regulation
  - Criminal and drug-related activity, more extensively than required by law or regulation
  - More general screening than criminal and drug-related activity (list factors below)
  - Other (list below)

Previous public housing evictions or money owed to this and other housing authorities.

- b.  Yes  No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- c.  Yes  No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- d.  Yes  No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)
- e. Indicate what kinds of information you share with prospective landlords? (select all that apply)
- Criminal or drug-related activity
- Other (describe below)

Previous owner's names & addresses, prior damage claims paid, eviction notices.

## **(2) Waiting List Organization**

- a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)
- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program
- Other federal or local program (list below)
- b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)
- PHA main administrative office (when the list is open)
- Other (list below)

## **(3) Search Time**

- a.  Yes  No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below:

1. New participants from the waiting list or as a reasonable accommodation for a family with a disabled person.
2. Also, participants now receive one 30 day extension for a total of 90 days when moving from one unit to another.

## **(4) Admissions Preferences**

- a. Income targeting

- Yes  No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?



## b. Preferences

1.  Yes  No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

## Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

## Other preferences (select all that apply)

- (2) Working families and those unable to work because of age or disability (ratio of 4:1)
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

1 Date and Time

## Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

## Other preferences (select all that apply)

- Working families and those unable to work because of age or disability 1:4
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- Date and time of application
- Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for "residents who live and/or work in the jurisdiction" (select one)

- This preference has previously been reviewed and approved by HUD
- The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

### **(5) Special Purpose Section 8 Assistance Programs**

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- The Section 8 Administrative Plan
- Briefing sessions and written materials
- Other (list below)

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

- Through published notices
- Other (list below)

Direct mailings to participants and applicants

**4. PHA Rent Determination Policies**

[24 CFR Part 903.7 9 (d)]

**A. Public Housing**

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

**(1) Income Based Rent Policies**

Describe the PHA's income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions, in the appropriate spaces below.

a. Use of discretionary policies: (select one)

- The PHA will not employ any discretionary rent-setting policies for income based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

- The PHA employs discretionary policies for determining income based rent (If selected, continue to question b.)

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent? (select one)

- \$0  
 \$1-\$25  
 \$26-\$50

2.  Yes  No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

2. If yes to question 2, list these policies below:

Families seeking work, elderly families (62 years and over) and disabled families without income.

c. Rents set at less than 30% than adjusted income

1.  Yes  No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?

2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

Flat Rents

d. Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ (select all that apply)

- For the earned income of a previously unemployed household member
- For increases in earned income
- Fixed amount (other than general rent-setting policy)  
If yes, state amount/s and circumstances below:
- Fixed percentage (other than general rent-setting policy)  
If yes, state percentage/s and circumstances below:
- For household heads
- For other family members
- For transportation expenses
- For the non-reimbursed medical expenses of non-disabled or non-elderly families
- Other (describe below)

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income) (select one)

- Yes for all developments
- Yes but only for some developments
- No

2. For which kinds of developments are ceiling rents in place? (select all that apply)

- For all developments
- For all general occupancy developments (not elderly or disabled or elderly only)
- For specified general occupancy developments
- For certain parts of developments; e.g., the high-rise portion
- For certain size units; e.g., larger bedroom sizes
- Other (list below)

3. Select the space or spaces that best describe how you arrive at ceiling rents (select all that apply)

- Market comparability study
- Fair market rents (FMR)
- 95<sup>th</sup> percentile rents
- 75 percent of operating costs
- 100 percent of operating costs for general occupancy (family) developments
- Operating costs plus debt service
- The "rental value" of the unit
- Other (list below)

## f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)

- Never
- At family option
- Any time the family experiences an income increase
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold)\_\_\_\_\_
- Other (list below)

g.  Yes  No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year?

**(2) Flat Rents**

1. In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.) (Not yet set)

- The section 8 rent reasonableness study of comparable housing
- Survey of rents listed in local newspaper
- Survey of similar unassisted units in the neighborhood
- Other (list/describe below)

**B. Section 8 Tenant-Based Assistance**

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

**(1) Payment Standards**

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

- At or above 90% but below 100% of FMR
- 100% of FMR
- Above 100% but at or below 110% of FMR (106%)
- Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- The PHA has chosen to serve additional families by lowering the payment standard
- Reflects market or submarket

Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- Reflects market or submarket
- To increase housing options for families
- Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

- Annually (unless families begin to have difficulty locating units within appropriate range.
- Other (list below)

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

- Success rates of assisted families
- Rent burdens of assisted families
- Other (list below)

Rent reasonableness standards.

**(2) Minimum Rent**

a. What amount best reflects the PHA's minimum rent? (select one)

- \$0
- \$1-\$25
- \$26-\$50

b.  Yes  No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

**5. Operations and Management**

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

**A. PHA Management Structure**

Describe the PHA’s management structure and organization.

(select one)

- An organization chart showing the PHA’s management structure and organization is attached. (Included as an attachment at the end of this report.)
- A brief description of the management structure and organization of the PHA follows:

The Providence Housing Authority is Governed by an eleven member Board of Commissioners that includes two city councilmen and three resident positions.

Administratively, the PHA is managed by an Executive Director whose office includes the Deputy Director, Legal Council, Security, the Office of Management Information Systems and the Office of Policy, Planning & Resource Development. Under the Executive Director are six functional departments: Housing Management, Facilities Management, Finance & Accounting, Community Services, Special Projects and Rental Housing.

**B. HUD Programs Under PHA Management**

List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use “NA” to indicate that the PHA does not operate any of the programs listed below.)

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	2,510 (families)	300
Section 8 Vouchers	694 (families)+308 Transfers in	100
Section 8 Certificates	1,170 (families)	100
Section 8 Mod Rehab	308 (families)	145
Special Purpose Section 8 Certificates/Vouchers (list individually)	N/A	N/A
Public Housing Drug Elimination Program (PHDEP)	225 youth also undetermined number of un-enrolled adults	Approximately 50 annually
Other Federal Programs (list individually)		
Elderly Service Coordinators	550	Open to all elderly and elderly/disabled development residents.
EDSS/Elderly Disabled	150	Open to all elderly and elderly/disabled development residents.
World of Work Plus	150	Multiyear program
FSS	150	Multiyear program
GED/ESL	50	90%
Office Skills	25	100%
ESL/GED	25	As needed
PHASE	6	100%

**C. Management and Maintenance Policies**

List the PHA’s public housing management and maintenance policy documents, manuals and handbooks that contain the Agency’s rules, standards, and policies that govern maintenance and management of public housing, including a description of any measures necessary for the prevention or eradication of pest infestation (which includes cockroach infestation) and the policies governing Section 8 management.

(1) Public Housing Maintenance and Management: (list below)

**Facilities Management Operations Manual**

**Chapter 1: Introduction**

Introduction  
Mission Statement  
Function Statement

**Chapter 2: Facilities Management And Planning**

Organizational Structure And Staffing  
PHAS Performance Standards  
Annual Goals Management Plan  
Annual Facilities Management Plan

**Chapter 3: Dispatch**

Dispatch  
Rovers  
Call Back Policy  
Building Control And Monitoring System

**Chapter 4: Work Orders**

The Work Order System  
Generating Work Orders  
Assigning Work Orders  
Completing Work

**Chapter 5: Inspection**

Unit Preventative Maintenance Inspections  
Building And Grounds Inspections  
Vacant Unit Inspections  
Occupancy Inspections  
Major Systems Inspections  
Quality Control Inspections  
Snow Removal Inspections

**Chapter 6: Unit Turn-Around**

Unit Turnaround  
Quality Control Standards  
Procedure  
Anticipating Vacancies

**Chapter 7: Inventory Control System**

Inventory Control System  
Maintenance Inventory Model  
Reports  
Warehousing  
Tools And Equipment

**Chapter 8: Vehicles**

Motor Vehicle Preventive Maintenance  
Vehicle Inspections



Vehicle Trip Log  
Gasoline Purchasing Procedure  
Accidents  
Motor Vehicle Replacement Policy

**Chapter 9: Energy Management**

Energy Management  
Annual Energy Conservation  
Annual Utility Review  
Energy Management Strategies

**Appendices**

**Appendix A: Job Descriptions**  
**Appendix B: Goals Management Plan**  
**Appendix C: Snow Removal Plan**  
**Appendix D: Landscape Plan**  
**Appendix E: Development Inventory**  
**Appendix F: Tenant Charges**  
**Appendix G: Quality Control Standards**  
**Appendix H: Planned Maintenance Schedules**  
**Appendix I: Forms**

**Inspection Forms**

FM-Ins1 Annual Apartment Inspection Checklist (UPM Inspection)  
FM-Ins2 Building And Grounds Inspection  
FM-Ins2aRoof Inspection  
FM-Ins3 Life Safety Systems Log  
FM-Ins4 Major Systems Inspections  
FM-Ins5 Quality Control Inspection Report  
FM-Ins6 Snow Removal Inspection  
FM-Ins7 Unit Turnaround: Final Apartment Inspection  
FM-Ins8 Unit Turnaround Update Form  
FM-Ins9 Vacant Unit Inspection

**Vehicle Forms**

FM-Veh1 In-Shop Vehicle Maintenance  
FM-Veh2 Monthly Vehicle Fuel Log  
FM-Veh3 Motor Vehicle Accident Report (DMV)  
FM-Veh4 Vehicle Accident Report  
FM-Veh5 Vehicle Checklist  
FM-Veh6 Vehicle Trip Log

**Inventory/Purchases Forms**

FM-Inv1 Employee's Equipment Receipt/Agreement and Custody Form  
FM-Inv2 Request Slip for Supplies and Equipment  
FM-Inv3 Temporary Equipment Custody Form

**Logs**

FM-Log1 Call Back Log  
FM-Log2 Dispatch Office Radio Check-out Log  
FM-Log3 Elevator Log  
FM-Log4 Employee Sick Log  
FM-Log5 Key Log

**Appendix J: Employee Performance Evaluation Forms**

## **Housing Management Administrative Handbook**

### **Forward**

#### **Chapter 1: History/Organization**

History of Public Housing  
Public Housing Occupancy  
Department of Housing Management  
General Responsibilities  
Organization of Department  
Function Statement

#### **Chapter 2: Introduction to Admissions & Continued Occupancy Plan**

Overview  
Fair Housing  
Reasonable Accommodation  
Communication  
Questions to Ask In Granting Accommodation  
Non-English Speaking Applicants and Residents  
Family Outreach  
Right to Privacy  
Required Postings

#### **Chapter 3: Eligibility for Admission**

Policy Statement  
Eligibility Criteria  
Family  
Income Limits for Admission  
Citizenship and Eligible Immigration Status  
Suitability  
Grounds for Denial  
Posting of Admissions Policy

#### **Chapter 4: Application Processing**

Pre-Application  
Processing of Pre-Application  
Pre-Application Data Entry  
Application  
Processing of Application  
File Maintenance  
Establishing Applicant File

Applicant Updates  
Quality Control Checks

**Chapter 5: Waiting List**

Establishing and Maintaining a Waiting List  
Overview  
Opening and Closing of Waiting List  
Waiting List Preferences  
Updating the Waiting List

**Chapter 6: Verification Process**

Overview  
Types of Verification  
Third Party Verification  
Verbal Verification  
Original Documents  
Applicant Certification  
Information Subject to Change  
Sources of Verification  
Applicant Information Release Waiver  
Verification Steps  
Obtaining Third Party Verification  
Verification of Family Composition and Income  
Familial Identification  
Eligible Immigration Status  
Dependent Information  
Family's Annual Income  
Adjusted Income  
Net Family Assets  
Verifying Non-Economic Selection Criteria  
History of Criminal Activity  
Landlord Verification  
Utility Service  
Home Visit  
Home Visit Form  
Shelter or Other Transitory Housing  
Medical Facilities  
Living with Families  
Re-inspections  
Interview

Interview Forms  
Office Interview Form  
Fraud  
Verification Time Limits

**Chapter 7: Reviewing Verified Information**

Overview  
Office Interview Report  
Residency Verifications  
Property Damage, Housekeeping, and Disturbances  
Acceptable Documentation  
Primary Indicators  
Secondary Indicators  
Income/Asset/Local Preference Verification  
Criminal Record Verification  
Impact of Criminal Activity on the Community  
Other Factors and Considerations  
Verification of Mitigating Circumstances  
Other Documentation  
Home Visits  
Location Preference

**Chapter 8: Final Determination**

Overview  
Final Determination  
Landlord Responses  
Criminal Activity  
Responses from Shelters  
Evictions  
Home Visits  
Interview  
Participation in Preparation for Community Living  
Outstanding Balance on PHA Account  
Mitigating Circumstances  
Misrepresentation and Fraud  
Application Activity Record  
Eligibility Determination  
Preference Determination  
Mandatory and Permanent Ineligibility  
Admission of Applicants with Disabilities

Waiting Period  
Record keeping

**Chapter 9: Income, Exclusions and Deductions**

Annual Income  
Convert to Annual Income  
Income of Dependents  
Income of Temporarily Absent Family Members  
Income of Confined Family Members  
Income from Assets 9-6  
Regular Contributions and Gifts  
Alimony or Child Support  
Income from a Business  
Social Security Overpayment Withholding  
Lump Sum Payments  
Lump Sum Payments Involving Attorney Fees  
Relocation Payments  
Reimbursement for Program Related Expenses  
Treatment of Income from Training Programs  
Title V  
Adjusted Income  
Dependent  
Elderly/Disabled Deduction  
Child Care Expenses  
Medical Expenses  
Allowance for Disability Expenses  
Specialized Calculation for Households Eligible for Handicapped Assistance and Medical Expenses  
Excess Utility Expenses—Medical Equipment  
Income Exclusions

**Chapter 10: Rent Calculation**

Family Choice in Rent  
Formula Based Rent  
Minimum Rent  
Flat Rent  
Rent for Families under the Non-citizen Rule  
Rent Changes for Families Receiving Public Assistance  
Utility Allowance  
Calculation of Total Tenant Payment

**Chapter 11: Tenant Assignment**

Occupancy Standards  
Development Type  
Unit Type  
Single Pregnant Women  
Foster Children or Foster Adults  
Child Custody  
Same Gender Adults  
Live-in Aides  
Accessible Units  
Nondiscriminatory Interaction with Disabled Applicants  
Local Preferences and Broad Range of Incomes  
De-concentration Policy  
De-concentration Incentives  
Targeting  
Limitation of Non-Very Low Income Families  
Placement Procedures  
Record keeping

**Chapter 12: Reporting**

**Chapter 13: Marketing**

Overview  
Identifying Obstacles  
Marketing Plan  
Measure Success of Performance

**Chapter 14: Leasing**

Overview  
Receiving Units from Maintenance  
Sending Application Folders to Developments  
Showing Units  
Preparing for Leasing  
MoveIn Inspection  
MoveIn Orientation  
Lease Reading 14-7  
Security Check List  
Lead-Based Paint Notification  
Rent and Security Deposit  
Keys  
Processing Lease

Follow Up

**Chapter 15: Rent Collection**

Importance of Rent Collection

Resident Orientation

Role of Housing Manager

Lease Requirements for Rental Payments

Rent Collection

Termination for Nonpayment of Rent

Lease Termination Notice Requirements

Other

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2. Office Policy and Procedures Manual
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Section 2 Eligibility for Admission  
Section 3 Rent Calculation  
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## **6. PHA Grievance Procedures**

[24 CFR Part 903.7 9 (f)]

Exemptions from component 6: High performing PHAs are not required to complete component 6. Section 8-Only PHAs are exempt from sub-component 6A.

### **A. Public Housing**

1.  Yes  No: Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

If yes, list additions to federal requirements below:

2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)

- PHA main administrative office  
 PHA development management offices  
 Other (list below)

### ***Grievance Procedures***

#### ***Overview***

The PHA grievance procedure was developed to provide applicants and residents with a standardized and prompt process for resolving disputes with the PHA. The grievance procedure has been designed in accordance with the Order of the court in CA NO. 82-0169S, U.S. District Court, District of Rhode Island - Johnson et al v. Housing Authority of the City of Providence.

Additionally, the QHWRA requires the PHA to change its grievance procedure to comply with the following:

- Residents do not have the protection of the grievance procedure if they are engaged in violent or drug related activities.
- The PHA must allow the grievance procedure to cover disputes over refusals to renew a public housing lease due to lack of compliance with the community service requirement and disputes over an agency's refusal to lower a rent payment after public assistance payments are reduced due to noncompliance with the public assistance program.

If a hearing is not required, the PHA must notify the Tenant.

#### ***Applicability***

The PHA may exclude any grievance concerning an eviction or termination of tenancy based upon a resident's creation or maintenance of a serious threat to the health or safety of other residents or of PHA employees from grievance procedure requirement. In these cases, the PHA shall proceed in accordance with the Rhode Island "twenty day" summons and complaint procedures in the Sixth Division District Court.

The Grievance Procedure is not a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA Board of Commissioners or Executive Director, nor is it a forum for disputes between residents or class grievances. However, an individual resident may challenge a PHA policy, as applied to that resident, as being in conflict with the rules or laws listed in the definition of a grievance below.

#### ***Definitions***

**Grievance:** a grievance is any dispute that a resident or applicant may have with respect to a PHA action or failure to act in accordance with the individual resident's lease or federal statute.

**Resident:** a resident of the PHA is any lessee or the remaining head of household of any resident family residing in housing owned and managed by the PHA, or any applicant for public housing.

### ***Filing a Grievance***

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It is the purpose of this procedure to allow Tenants to bring complaints to the attention of the PHA and obtain immediate resolution, maintenance, or correction without the requirement of initiating a grievance. Not every complaint triggers a grievance. Any Tenant may initiate a grievance by obtaining a Grievance Request (Figure 25-1) to be completed at either the Housing Manager's office or the PHA's central office.

A grievance is filed when the Grievance Request is completed, signed, and dated (top portion). In compliance with 24 CFR 966.55, the Grievance Request shall specify the reasons for the grievance and the action or relief sought.

Adequate forms shall be provided by the PHA and available in each Management Office and at the PHA's central offices.

The Grievance Procedure will remain on file in each management office at all times. A notice of the availability of the procedure will be posted at all times.

### ***Grievance Process***

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The Housing Manager shall respond to the grievance within five (5) working days of the filing of a grievance. The response shall be in writing, signed and dated and the grievant shall sign and date the receipt of the Housing Manager's written response on the *Grievance Request* form. If, by the end of the fifth business day, the Housing Manager has not obtained the signed receipt from the resident, the Housing Manager shall deliver or mail (first class regular U.S. mail) a copy of the response to the resident, and the day after such delivery or mailing date shall be deemed the date of receipt.

### ***Review***

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No later than the fifth business day after the grievant's receipt of the response, the grievant may request a review by the Executive Director by signing and dating the appropriate line on the *Grievance Request* form. The request for review shall be immediately forwarded to the Executive Director, by the PHA, and the Executive Director shall record a decision and communicate it to the grievant in the same procedure as set forth in Section 25.5.1 above.

Within five days of the grievant's receipt of the Executive Director's decision, the grievant may request the convening of the full grievance hearing by signing and dating the appropriate line on the *Grievance Request* form. The request for a grievance hearing shall be immediately forwarded to the Grievance Procedure secretary at the PHA's central offices.

The grievance shall be held within twenty (20) working days of the date of the request. The hearing shall be held at the local housing development of the grievant, or at the central office in the case of an applicant, or at any other location if mutually agreeable to the PHA and the grievant.

### ***Postponements***

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The date of the hearing may be postponed by the decision of at least two of the three grievance panel members. The Grievance Procedure secretary shall immediately notify the grievant and the PHA personnel involved of any postponements. Only one postponement of the hearing will be allowed, without the grievant's consent, and the rescheduled hearing shall be held within twenty (20) working days of the originally scheduled date. The same panel shall conduct the postponed hearing. Best efforts shall be made to hold the hearing at a time and place reasonably convenient to both grievant and the PHA. The grievant may also postpone the hearing once.

### ***Notification and Document Review***

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The ***grievant must receive written notice of the hearing at least two weeks prior to the hearing.*** The PHA shall use Figure 25-2 for all such notices. Proof of grievant receipt of the notice shall be by signed receipt or by notation of mailing to the grievant's address. Mailing must occur no later than fifteen days prior to the hearing.

***Any documents, records, or regulations not made available may not be relied upon by the PHA at the grievance hearing.***

### ***Conducting a Hearing***

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#### ***Private Hearing***

The grievant has a right to a private hearing (i.e., only the panel, grievant, grievant representative, PHA representative, and witnesses). However, the hearing may be public if the grievant so requests.

#### ***Conducting a Hearing***

The following guidelines should be adhered to when conducting a grievance hearing.

- The third, or neutral, panel member shall chair the panel and rule on points of order and procedure. The strict rules of evidence and procedure shall not apply unless specifically stated in this procedure.
- Each side has the right to present evidence, documents, witnesses, and arguments to challenge evidence relied upon by the opposing side, and to confront and cross-examine witnesses upon whose testimony the other side relies.
- The panel shall require all persons present to conduct themselves in an orderly fashion.
- The panel may allow a party to submit any document after the hearing as long as a copy is provided to the opposing side, with opportunity to respond. If absolutely necessary, the panel may continue and reconvene the hearing for further testimony or argument, subject to the same timetable as that used for postponements.
- Either party may arrange for a transcript of the hearing. Arrangements to be made in advance and, at the requesting party's expense.
- The order of presentation of evidence and arguments, and the appropriateness of panel members asking their own questions shall be left to sound discretion of the panel.
- The panel shall allow each side a reasonable time for presentation of its case but may conclude the hearing when the panel feels no new evidence or arguments are being offered.
- In exceptional circumstances, the panel may exclude any person for failure to comply with the directions of the panel chairperson or may, with advance warning, conclude the hearing with a decision against a party being disruptive, disorderly or repeatedly failing to comply with the panel's directions.

#### ***Panel Decision***

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No later than ten (10) working days after the conclusion of the hearing, the panel will issue a written decision and mail or deliver it to the grievant and the Grievance Secretary. The Grievance Secretary will deliver it to the Executive Director of the PHA. The decision will explain the reasons for the panel's conclusions. The decision will specifically explain the result, relief, or remedy if any, which was reached including, where appropriate, precise dates, dollar figures, and conditions, which any party must adhere to as part of the relief. The decision will note whether it is unanimous and shall identify any dissenting member of the panel. It may include a written explanation for the dissent. The decision shall be dated and signed by the Chairperson. The decision shall be typewritten, and the Chairperson may use the services of the Grievance Secretary to do so.

#### ***Effect of Panel Decision***

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The decision of the panel shall be binding on the PHA, which shall take all actions, or refrain from any actions, necessary to carry out the decision unless the PHA Board of Commissioners determines within a reasonable time, and promptly notifies the grievant of its determination, that:

- The grievance does not concern PHA action or failure to act; or
- The decision of the panel is contrary to applicable federal, state, or local law, HUD regulations, or requirements imposed upon the PHA by the annual contributions contract between HUD and the PHA.

A decision of the panel in favor of the PHA, in whole or part, will neither constitute a waiver of, nor affect in any manner, any rights the grievant may have to a trial de novo or judicial review in any judicial proceedings, which may

thereafter be brought in the matter. The decision shall be binding on the resident, however, insofar as any future grievance is concerned, on the same facts, by the same grievant.

### ***Issues of Rent***

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Where a resident is current in rent and initiates a grievance, the resident must remain current through the date of the request for the hearing at which point the resident may pay rent into the PHA's grievance escrow account in lieu of paying rent to the PHA. In cases involving escrow accounts, the decision of the panel shall address itself to the question of disbursement of such account, in whole or in part, with condition or a timetable attached to such disbursements.

Where a resident is current in rent, and the PHA initiates an eviction action, the resident may request a grievance procedure prior to the state court action as long as the resident:

- remains current in rent; or
- follows the same escrow procedure.

Where a resident is in arrears in rent, and the PHA initiates any eviction action, that resident may request a grievance and be entitled to a grievance hearing only if that resident thereafter pays each month's rent as it becomes due at the beginning of the next month following the month in which the PHA initiates the eviction action (i.e., ***no additional arrearages may accrue during the pendency of the grievance***).

Where a resident is in arrears in rent, the rent must be brought current before that resident may initiate his or her own grievance.

The PHA shall be considered to have initiated an eviction action by sending a notice of proposed termination or notice of intent to evict or to terminate a lease. A "warning" or conditional notice shall not be considered such a notice.

Failure on the part of the resident to comply with these requirements shall constitute a forfeiture of the grievance procedure.

### ***Grievance Panel***

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The grievance panel shall consist of three persons, one from each of the following categories:

- The PHA pool;
- The resident pool; and
- The neutral pool.

The PHA pool shall consist of employees of the PHA, as designated by the Executive Director from time to time; this pool shall have no fewer than four members at all times; no member may remain in the pool for more than six months out of each calendar year.

The resident pool shall consist of all residents who shall volunteer to serve with the Grievance Secretary posting notices twice each year, in every development, seeking volunteers for the grievance pool. No member may remain in the pool for more than six months out of each calendar year.

The neutral pool shall consist of third parties who have no employment, financial, or other conflicting interest in the PHA, and, therefore, serve as neutral arbitrators. This member of the pool shall be the chairperson. The parties to this action shall jointly solicit members for this pool by contacting, in writing, the following agencies<sup>2</sup> and community groups and requesting that each agency or group designate one employee or member to serve:

- Elmwood Community Center
- Rhode Island Human Rights Commission
- PRO - CAP
- Joslin Center

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<sup>2</sup> The Agencies included in this list were compiled as a part of a larger legal document. Some of the agencies are no longer in existence.



- ♦ Smith Hill Center
- ♦ John Hope Settlement House
- ♦ Urban League
- ♦ Black Ministerial Alliance
- ♦ Progreso Latino
- ♦ S.R.S.
- ♦ Providence Mental Health
- ♦ Providence Human Relations Commission
- ♦ International House
- ♦ Providence Ambulatory Health Care Facilities
- ♦ D.C.A. Department of Women & Human Resources
- ♦ Sojourner House
- ♦ Women’s Development Corporation
- ♦ South Providence Neighborhood Center
- ♦ DaVinci Center
- ♦ Rhode Island Indian Council
- ♦ Federal Hill House Association
- ♦ St. Martin de Porres Center
- ♦ Education Opportunity Center
- ♦ Junior Chamber of Commerce
- ♦ Marathon House
- ♦ Providence Corporation

The neutral pool members shall serve no longer than twelve consecutive months, after which their respective agencies and groups shall be requested to designate another person. It shall be the duty of the neutral member of the panel to exercise independent judgment.

***Availability***

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The PHA will make the grievance procedure available in management offices and at the administrative office. Each resident shall be entitled to one copy upon request.

***Grievance Secretary***

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The Grievance Secretary is ineligible to be in the PHA pool for the grievance panels.

The Grievance Secretary, upon receipt of a request for a grievance panel hearing in accordance with this procedure, shall promptly schedule the hearing by randomly selecting one person from each of the three pools, arranging a date, time and place and shall notify the panel members and the parties. The Grievance Secretary shall advise each panel member of the grievant’s name and (if applicable) development to ascertain if a conflict exists for that panel member. The PHA member of the panel shall not be employed at the local management office of the grievant’s development.

There shall be no communications between or among any panel members or the grievant prior to the hearing, and the Grievance Secretary shall not advise panel members of any details of the grievance, except insofar as necessary to determine conflicts of interest.

***Miscellaneous***

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***Escrow***

The PHA's grievance procedure continues and adopts the “escrow” provisions of the settlement reached in Mitchell, et al v. Housing Authority of the City of Providence, C.A. No. 77-0615 (U.S. District Ct., D.R.I.). To the extent of any inconsistencies, this Grievance Procedure shall supersede and control over all prior procedures.

***Other***

This Grievance Procedure shall be the sole procedure, until modified or replaced, per order of the Court, for all residents and applicants of the PHA, replacing any inconsistent prior procedures or practices.

The U.S. District Court retained jurisdiction to consider future changes in this procedure.

**Failure to Request Hearing**

Per 24 CFR 966.55, Failure to request a hearing does not constitute a waiver of a Tenant's right to contest an action in court.

**B. Section 8 Tenant-Based Assistance**

1.  Yes  No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

(Applicants have access to the PHA's grievance procedures, Section 8 program participants are granted informal hearings)

If yes, list additions to federal requirements below:

Please see the grievance procedures included under Public Housing.

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (Select all that apply)

- PHA main administrative office  
 Other (list below)

## **7. Capital Improvement Needs**

[24 CFR Part 903.7 9 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

### **A. Capital Fund Activities**

Exemptions from sub-component 7A: PHAs that will not participate in the Capital Fund Program may skip to component 7B. All other PHAs must complete 7A as instructed.

#### **(1) Capital Fund Program Annual Statement**

Using parts I, II, and III of the Annual Statement for the Capital Fund Program (CFP), identify capital activities the PHA is proposing for the upcoming year to ensure long-term physical and social viability of its public housing developments. This statement can be completed by using the CFP Annual Statement tables provided in the table library at the end of the PHA Plan template **OR**, at the PHA's option, by completing and attaching a properly updated HUD-52837.

Select one:

The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment (state name)

-or-

The Capital Fund Program Annual Statement is provided below: (if selected, copy the CFP Annual Statement from the Table Library and insert here)

Please see following pages

**Component 7**  
**Capital Fund Program Annual Statement**  
**Parts I, II, and III**

**Annual Statement****Capital Fund Program (CFP) Part I: Summary**  
Revised StatementCapital Fund Grant Number RI 43 P001 50101 FFY of Grant Approval: (09/2001) Original Annual Statement

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	
2	1406 Operations	\$968,000
3	1408 Management Improvements	\$233,800
4	1410 Administration	\$641,393
5	1411 Audit	
6	1415 Liquidated Damages	
7	1430 Fees and Costs	\$316,500
8	1440 Site Acquisition	
9	1450 Site Improvement	\$121,946
10	1460 Dwelling Structures	\$2,472,793
11	1465.1 Dwelling Equipment-Nonexpendable	\$29,500
12	1470 Nondwelling Structures	\$25,000
13	1475 Nondwelling Equipment	\$30,000
14	1485 Demolition	
15	1490 Replacement Reserve	
16	1492 Moving to Work Demonstration	
17	1495.1 Relocation Costs	\$5,000
18	1498 Mod Used for Development	
19	1502 Contingency	
20	<b>Amount of Annual Grant (Sum of lines 2-19)</b>	\$4,843,932
21	Amount of line 20 Related to LBP Activities	\$10,000
22	Amount of line 20 Related to Section 504 Compliance	\$208,000
23	Amount of line 20 Related to Security	\$491,000
24	Amount of line 20 Related to Energy Conservation Measures	\$725,420

Annual Statement

Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Chad Brown 001	Fence/walks/paving/site furniture	1450	\$10,000
	Landscaping	1450	\$10,000
	Repair Steam Lines	1450	\$10,000
	Repoint/Seal Exterior Masonry	1460	\$40,000
	Interior Doors	1460	\$5,000
	Kitchens - Cabinets/Countertops	1460	\$22,500
	Heating System Upgrade	1460	\$650,000
	Baseboard Upgrade	1460	\$3,000
	Bathroom Renovations	1460	\$6,000
	Appliance Purchase	1465	<u>\$12,750</u>

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Admiral Terrace 001A	Design new heating system	1430	\$25,000
	Concrete sidewalks	1450	\$10,000
	Fence/walks/paving/site furniture	1450	\$10,000
	Landscaping	1450	\$10,000
	Repair Steam Line	1450	\$20,000
	Repoint/Seal Exterior Masonry	1460	\$40,000
	Interior Doors	1460	\$4,000
	Kitchens - Cabinets/Counters	1460	\$22,500
	Bathroom Renovations	1460	\$6,000
	Baseboard Upgrade in bathroom	1460	\$3,000
	Appliance Purchase	1465	<u>\$12,750</u>
			\$163,250

## Annual Statement

## Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Roger Williams 002	Renovate building exterior	1460	\$60,000
	Bathroom Renovations	1460	\$4,800
	Refrigerator Replacement	1465	<u>\$4,000</u>
			\$68,800

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Hartford Park 004/006/019	Design new community center	1430	\$50,000
	Upgrade landscaping	1450	\$10,000
	Paint Phase II & 4 Story Buildings	1460	\$127,643
	New entrances to D buildings	1460	\$40,000
	Repair/Replace Roof Hatches	1460	\$15,000
	Replace Windows	1460	\$10,000
	Replace Exterior Doors	1460	\$15,000
	Install bath vent fans	1460	\$15,600
	Install backflow valves	1460	<u>\$20,000</u>
			\$235,600

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Manton Heights 005	New roofs on wood buildings.	1460	\$32,000
	Replace Panic Devices	1460	\$10,000
	Remove aristic ceilings	1460	\$25,000
	Install prototype vent fan unit	1460	<u>\$20,000</u>
			\$87,000

Annual Statement

Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Dexter Manor I 008	Seal Exterior Masonry	1460	\$50,000
	Building Exterior Doors	1460	\$2,000
	Upgrade units (kitchens)	1460	\$10,000
	Replace resilient floor tile	1460	\$14,400
	install GFI's in kitchen & bath	1460	\$5,100
	Magnetic Latches for Fire Doors	1460	\$2,000
	Asbestos Abatement	1460	\$10,000
	Reconfigure handicapped units	1460	\$68,000
	Replace Kitchen faucets	1460	\$3,500
	Replace Water Supply Shutoffs	1460	\$6,250
	Upgrade Baths on turnaround	1460	\$6,000
	Upgrade Ventilation	1460	\$1,000

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Dominica Manor 009	Install energy efficient lighting	1460	\$3,000
	Install GFI's in kitchen & bath	1460	\$5,000
	Reconfigure handicapped units	1460	\$70,000
	Deferred Painting	1460	\$12,000
	Asbestos Abatement	1460	\$8,000
	Replace Floor Tile	1460	\$12,000
	Magnetic Latches for Fire Doors	1460	\$3,000
	Replace Kitchen Faucets	1460	\$2,800
	Replace Water Supply Shutoffs	1460	\$5,000
	Upgrade Baths on turnaround	1460	\$4,000
	Upgrade Ventilation	1460	\$3,000
	Construct Storage shed	1470	\$25,000

Annual Statement

Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Carroll Tower 011	Fence/walks/paving/site furniture	1450	\$5,000
	Landscaping	1450	\$4,000
	Kitchens-Cabinets/Countertops	1460	\$12,000
	New Accordion Doors	1460	\$7,200
	Fire Alarm Sys. Upgrade	1460	\$300,000
	Magnetic Latches for Fire Doors	1460	\$1,000
	Asbestos Abatement (tile)	1460	\$10,000
	Replace Kitchen Faucets	1460	\$2,000
	Replace Water Supply Shutoffs	1460	\$1,250
	Upgrade Baths on turnaround	1460	<u>\$8,000</u>

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Kilmartin Plaza 012	Install Railings in Halls	1460	\$20,000
	Water Conservation Devices	1460	\$7,420
	Magnetic Latches for Fire Doors	1460	\$8,000
	Reconfigure Handicapped Units	1460	\$62,000
	Asbestos Abatement	1460	\$10,000
	Replace Water Supply Shutoffs	1460	\$2,750
	Upgrade Baths on turnaround	1460	<u>\$8,000</u>
			\$118,170



## Annual Statement

## Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Parenti Villa 013	Design Fire Alarm Sys.Upgrade	1430	\$29,000
	Roof Replacement	1460	\$240,000
	Kitchens-Cabinets/Countertops	1460	\$10,000
	New Accordion Doors	1460	\$3,000
	Magnetic Latches for Fire Doors	1460	\$1,000
	Asbestos Abatement	1460	\$5,000
	Deferred Painting	1460	\$10,000
	Replace valves on risers	1460	\$2,000
	Replace Water Supply Shutoffs	1460	\$6,250
	Upgrade Baths on turnaround	1460	<u>\$4,000</u>

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Dexter Manor II 014	Replace Floor Covering	1460	\$12,000
	Replace Motorized Dampers	1460	<u>\$7,500</u>
			\$19,500

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Scattered Sites 017/021	Landscaping (1-21)	1450	\$10,000
	Tree Pruning/Removal	1450	\$5,000
	Paint Buildings (Duplex) (1-17)	1460	\$15,000
	Paint Buildings (Duplex) (1-21)	1460	\$15,000
	Vinyl Side structures (1-17)	1460	\$131,330
	Vinyl Flooring (1-17)	1460	<u>\$15,000</u>
			\$191,330

## Annual Statement

## Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Authority Wide	Operating Costs	1406	968,000
	Computer Software	1408	\$20,000
	Economic Development	1408	\$10,000
	Living Skill Coordinator	1408	\$51,300
	Police	1408	\$125,000
	Security Guards	1408	\$20,000
	FM Dept.- Communications System	1408	\$7,500
	CGP Administrative Costs	1410	\$484,393
	In House Design	1410	\$157,000
	A&E Fees	1430	\$120,000
	LBP/Asbestos Testing	1430	\$5,000
	MOD Inspection Costs	1430	\$82,500
	Utility Surveys	1430	\$5,000
	Tree Pruning	1450	\$7,946
	Asbestos Abatement	1460	\$10,000
	Handicapped Unit Modifications	1460	\$8,000
	LBP Abatement	1460	\$5,000
	Appliance Purchase	1465	\$10,000
	Computer Hardware	1475	\$25,000
	Office Furnishings	1475	\$5,000
	Relocation	1495	\$5,000
			<u>\$2,131,639</u>

**Annual Statement**

**Capital Fund Program (CFP) Part III: Implementation Schedule**

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)
Chad Brown	3/31/03	9/30/04
Admiral Terrace	3/31/03	9/30/04
Roger Williams	3/31/03	9/30/04
Hartford Park	3/31/03	9/30/04
Manton Heights	3/31/03	9/30/04
Dexter Manor I	3/31/03	9/30/04
Dominica Manor	3/31/03	9/30/04
Carroll Tower	3/31/03	9/30/04
Kilmartin Plaza	3/31/03	9/30/04
Parenti Villa	3/31/03	9/30/04
Dexter Manor II	3/31/03	9/30/04
Scattered Sites	3/31/03	9/30/04
Authority Wide	3/31/03	9/30/04

**(2) Optional 5-Year Action Plan**

Agencies are encouraged to include a 5-Year Action Plan covering capital work items. This statement can be completed by using the 5 Year Action Plan table provided in the table library at the end of the PHA Plan template **OR** by completing and attaching a properly updated HUD-52834.

a.  Yes  No: Is the PHA providing an optional 5-Year Action Plan for the Capital Fund?  
(if no, skip to sub-component 7B)

b. If yes to question a, select one:

The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment (state name: **ri001b01**)

-or-

The Capital Fund Program 5-Year Action Plan is provided below: (if selected, copy the CFP optional 5 Year Action Plan from the Table Library and insert here)

## B. HOPE VI and Public Housing Development and Replacement Activities (Non-Capital Fund)

Applicability of sub-component 7B: All PHAs administering public housing. Identify any approved HOPE VI and/or public housing development or replacement activities not described in the Capital Fund Program Annual Statement.

- Yes  No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)
- b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name:
2. Development (project) number:
3. Status of grant: (select the statement that best describes the current status)
  - Revitalization Plan under development
  - Revitalization Plan submitted, pending approval
  - Revitalization Plan approved
  - Activities pursuant to an approved Revitalization Plan underway

- Yes  No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?
- If yes, list development name/s below:

- Yes  No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?
- If yes, list developments or activities below:

The PHA will utilize tax credits to develop units at the remaining cleared land at the Roger Williams development site.

- Yes  No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?
- If yes, list developments or activities below:

The PHA plans to take advantage of regulations allowing PHA's to borrow against future Capital Fund monies. We hope to use this capitalization mechanism to build a new community center and facilities management central office at the Hartford Park development. These new facilities will replace existing facilities that are clearly inadequate. It is estimated that these activities will total approximately \$4,000,000.

**8. Demolition and Disposition**

[24 CFR Part 903.7 9 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

1.  Yes  No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

2. Activity Description

Yes  No: Has the PHA provided the activities description information in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 9. If “No”, complete the Activity Description table below.)

<b>Demolition/Disposition Activity Description</b>
1a. Development name: Hartford Park 1b. Development (project) number: RI 43P001004
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/> (Planned demolition of vacant units pending change in status of Court decision.)
4. Date application approved, submitted, or planned for submission: <u>(DD/MM/YY) NA, Plan has yet to be prepared.</u>
5. Number of units affected: 32
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: Fall 2001 b. Projected end date of activity: Fall 2001

## **9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities**

[24 CFR Part 903.7 9 (i)]

Exemptions from Component 9; Section 8 only PHAs are not required to complete this section.

1.  Yes  No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to component 10. If “yes”, complete one activity description for each development, unless the PHA is eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to component 10.)

### 2. Activity Description

- Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 10. If “No”, complete the Activity Description table below.

<b>Designation of Public Housing Activity Description</b>
1a. Development name: Dominica Manor and Carroll Tower
1b. Development (project) number: RI 43 P009 (Dominica Manor), RI 43 P0011 (Carroll Tower)
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA’s Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: (February 1995) (Approved 90 days after PHA submission of Allocation Plan) This was re-approved in 2000.
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan (NA, previously approved) <input type="checkbox"/> Revision of a previously-approved Designation Plan? (NA, plan has been approved)
6. Number of units affected: 398
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

### 10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

Exemptions from Component 10; Section 8 only PHAs are not required to complete this section.

#### A. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD FY 1996 HUD Appropriations Act

1.  Yes  No: Have any of the PHA’s developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act? (If “No”, skip to component 11; if “yes”, complete one activity description for each identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined submissions may skip to component 11.)

2. Activity Description

Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 11. If “No”, complete the Activity Description table below.

<b>Conversion of Public Housing Activity Description (N/A)</b>	
1a. Development name:	
1b. Development (project) number:	
2. What is the status of the required assessment?	
<input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)	
3. <input type="checkbox"/> Yes <input type="checkbox"/> No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)	
4. Status of Conversion Plan (select the statement that best describes the current status)	
<input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway	
5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one)	
<input type="checkbox"/> Units addressed in a pending or approved demolition application (date submitted or approved: ) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: ) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI Revitalization Plan (date	

submitted or approved: )

Requirements no longer applicable: vacancy rates are less than 10 percent

Requirements no longer applicable: site now has less than 300 units

Other: (describe below)

**B. Reserved for Conversions pursuant to Section 22 of the U.S. Housing Act of 1937**

**C. Reserved for Conversions pursuant to Section 33 of the U.S. Housing Act of 1937**

**11. Homeownership Programs Administered by the PHA**

[24 CFR Part 903.7 9 (k)]

**A. Public Housing**

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

1.  Yes  No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

2. Activity Description

Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 12. If “No”, complete the Activity Description table below.)

<b>Public Housing Homeownership Activity Description (Complete one for each development affected)</b>
1a. Development name: Scattered Sites
1b. Development (project) number: RI 43-POO1 040, RI 43-POO1 039, RI 43-POO1-017, RI 43-POO1-043, RI 43-POO1 036, RI 43- POO1 040 RI 43-POO1-030
2. Federal Program authority:
<input type="checkbox"/> HOPE I <input checked="" type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one)



<input checked="" type="checkbox"/> Approved; included in the PHA's Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: <u>(09/27/1194) Date of Implementing Agreement letter.</u>
5. Number of units affected: 10 6. Coverage of action: (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development

**B. Section 8 Tenant Based Assistance**

1.  Yes  No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If "No", skip to component 12; if "yes", describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 12.)

(PHA may conduct a feasibility study of this option)

2. Program Description:

a. Size of Program

Yes  No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- 25 or fewer participants
- 26 - 50 participants
- 51 to 100 participants
- more than 100 participants

b. PHA-established eligibility criteria

Yes  No: Will the PHA's program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?  
 If yes, list criteria below:

## **12. PHA Community Service and Self-sufficiency Programs**

[24 CFR Part 903.7 9 (1)]

Exemptions from Component 12: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

### **A. PHA Coordination with the Welfare (TANF) Agency**

1. Cooperative agreements:

- Yes  No: Has the PHA has entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed? 04/22/99

2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- Client referrals  
 Information sharing regarding mutual clients (for rent determinations and otherwise)  
 Coordinate the provision of specific social and self-sufficiency services and programs to eligible families  
 Jointly administer programs  
 Partner to administer a HUD Welfare-to-Work voucher program  
*(We have MOU but didn't get vouchers)*  
 Joint administration of other demonstration program  
 Other (describe)

### **B. Services and programs offered to residents and participants**

#### **(1) General**

a. Self-Sufficiency Policies

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (select all that apply)

- Public housing rent determination policies  
 Public housing admissions policies  
 Section 8 admissions policies  
 Preference in admission to section 8 for certain public housing families (check on these)  
 Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA  
 Preference/eligibility for public housing homeownership option participation  
 Preference/eligibility for section 8 homeownership option participation  
 Other policies (list below)

b. Economic and Social self-sufficiency programs

Yes  No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following table; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use. )

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
WOW Plus	Contract with JTPA for 100. Completers retained for 6 months. As of 5/02 plan to enroll 150.	Specific criteria	3 family developments	Both
FSS	150	Specific criteria	Employment Support Center (ESC)	Both
GED 20 hour program	25 per year	Specific criteria	Employment Support Center (ESC)	Both
ESL 20 hour program	25 per year	Specific criteria	Employment Support Center (ESC)	Both
Office skills	25 per year	Specific criteria	Employment Support Center (ESC)	Both
ESL tutorial	25 per year	Specific criteria	3 family developments	Both
GED tutorial	25 per year	Specific criteria	3 family developments	Both
PHASE	6 per year	Specific criteria	3 family developments and Brown University	Both
Community Services Family Unit/Youth				
Substance Abuse Prevention Education	75 per month	Parent must register youth  Mandatory participation	Community Centers (Chad Brown, Hartford Park, Manton Heights)	PHA resident youth ages 6-8 enrolled in the PHA Youth Program (Public Housing)
WISE-UP	150 per month	Parent must give permission  Mandatory participation	Community Centers (Chad Brown, Hartford Park, Manton Heights)	PHA resident youth ages 9-17 enrolled in the PHA Youth Program (Public Housing)
Academic Assistance		Self-select	Community Centers	PHA resident

6-12 Teens	150 per month 75 per month	strongly encouraged Mandated if below C average	(Chad Brown, Hartford Park, Manton Heights)	youth ages 6 – 17 enrolled in the PHA <i>Youth Program</i> (Public Housing)
Computer Resource Centers Drop in Labs	225 per month	Participants self select	Community Centers (Chad Brown, Hartford Park, Manton Heights)	PHA resident youth ages 6 – 17 enrolled in the PHA <i>Youth Program</i> (Public Housing)
Computer Resource Centers Computer Club	90 per month	Participants self select	Community Centers (Chad Brown, Hartford Park, Manton Heights)	PHA resident youth ages 6 – 17 enrolled in the PHA <i>Youth Program</i> (Public Housing)
Enrichment Classes (art, music, dance, yoga, etc.)	225 per month	Participants self select	Community Centers (Chad Brown, Hartford Park, Manton Heights)	PHA resident youth ages 6 – 17 enrolled in the PHA <i>Youth Program</i> (Public Housing)
Youth Service Council	15 per month	Selected by PHA staff on merit	Volunteer Center of Rhode Island	PHA program participants 13-17 (Public Housing)
Organized Sports (co-ed)	225 per month	Participants self select	Community Centers (Chad Brown, Hartford Park, Manton Heights)	PHA resident youth ages 6 – 17 enrolled in the PHA <i>Youth Program</i> (Public Housing)
Community Services Family Unit/Adult				
Family Advisory Council	14 per month	Members self select	Community Centers (Chad Brown, Hartford Park, Manton Heights)	PHA adult residents in good standing (Public Housing)
Family Community Building Activities	75 per month	Members self select	Community Centers (Chad Brown, Hartford Park, Manton Heights)	PHA adult residents in good standing (Public Housing)
Parent Volunteer Program	65 per month	Mandatory	Community Centers (CB, HP, MH)	All parents of program participants (Public Housing)
Computer Resource Center Adult Beginning Computer	New	Self/Staff Referral	Community Centers (CB, HP, MH)	All parents of program participants (Public Housing)
Parenting Skills (Parenting Wisely)	New	Self/Staff Referral	Community Centers (CB, HP, MH)	All parents of program

				participants (Public Housing)
Health Education (Health PHASE)	35 per month	Self/Staff Referral	Community Centers (CB, HP, MH)	All parents of program participants (Public Housing)
Counseling, Crisis intervention (Family Services, Inc. & HPCC)	150 per month	Self/Staff Referral	Community Centers (CB, HP, MH)	All parents of program participants (Public Housing)
Community Services Adult Unit Elderly/Disabled residents				
Health & Wellness Centers at Carroll Tower, Dexter manor, Dominica Manor  Geriatric Health Clinic	100 per year	Self / staff Referral  Appointments Required	RI Hospital Division of Geriatrics operates at 3 high-rises	Elderly 62+ with health insurance (Public Housing)
Health & Wellness Centers Services of Podiatrist and Pharmacist, Saving Sight, Flu Clinics	300 per year	Self/staff referrals Drop-in & Appointments	Outside services coordinated by Health Program Facilitator	All residents
Health & Wellness Centers Clinical Practicum for Nursing Students	100 per year	Self/Staff referral Drop-in visits	Various local colleges operate at 3 high-rises coordinated by Health Program Facilitator	All residents
Health & Wellness Centers Health Education	110 per month	Scheduled monthly, self selected	All sites, coordinated by the Health Program Facilitator	All residents
Congregate Nutrition Lunch Program	120 per year	Self / Staff Referral  Reservations Required	RI Meals on Wheels operates at 3 high-rises	All residents (Public Housing)
Certified Resident Services Coordinators	500 per year	Self / Staff Referral  Drop-in visits	On-site office at 7 developments	All residents (Public Housing)
<i>Housing Helps</i>  Supportive Services for Frail Residents	150 per year	Self / Staff Referral  Scheduled and On-call visits	Home visits at 7 developments by contracted registered nurse	All frail residents as determined by physical and cognitive assessments (Public Housing)
<i>Housing Helps</i> <i>Health &amp; Wellness Centers</i>  <i>Sick Call w/ Nurse Practitioner</i>	New	Self/staff referral  Drop-in	All sites, medical care by contracted nurse practitioner	All residents
<i>Housekeeping Assistance</i>  Supportive Services for Frail Residents	20 per year	<i>Housing Helps &amp; RSC</i> referral  Scheduled visits	In-home services at 7 developments by contracted housekeeper	All frail residents as determined by physical and cognitive

				assessments (Public Housing)
Transportation Services  Door to door round-trip transportation to medical appointments.	350 per year	Self / Staff / <i>Housing Helps</i> referral  Reservations Required	Central dispatcher coordinates rides	All residents (Public Housing)
Bus Trips	350 per year	Self / staff referral  Reservations Recommended	City of Providence Recreation Department – Senior Division Provides transportation to all 7 developments	All residents (Public Housing)
Various On-site Recreation Activities	350 per year	Self / staff referral  Drop-in Visits	Local churches, volunteers, community centers, provide weekly or monthly activities at 6 developments	All residents (Public Housing)

**(2) Family Self Sufficiency program/s**

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2001 Estimate)	Actual Number of Participants (As of: 01/01/01)
Public Housing	0	12/01/00 127
Section 8	0 (Note: Section 8 minimum program size was originally 27. There have been 35 positive completions, plus there are 20 active contracts.	11/30/99 16

b.  Yes  No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?  
If no, list steps the PHA will take below:

**C. Welfare Benefit Reductions**

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

- Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination
- Actively notifying residents of new policy at times in addition to admission and reexamination.
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
- Establishing a protocol for exchange of information with all appropriate TANF agencies
- Other: (list below)

**D. Reserved for Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937**

### **13. PHA Safety and Crime Prevention Measures**

[24 CFR Part 903.7 9 (m)]

Exemptions from Component 13: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to component 15. High Performing and small PHAs that are participating in PHDEP and are submitting a PHDEP Plan with this PHA Plan may skip to sub-component D.

#### **A. Need for measures to ensure the safety of public housing residents**

1. Describe the need for measures to ensure the safety of public housing residents (select all that apply)

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti
- People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- Other (describe below)

2. What information or data did the PHA used to determine the need for PHA actions to improve safety of residents (select all that apply).

- Safety and security survey of residents
- Analysis of crime statistics over time for crimes committed "in and around" public housing authority
- Analysis of cost trends over time for repair of vandalism and removal of graffiti
- Resident reports
- PHA employee reports

- Police reports
- Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- Other (describe below)

3. Which developments are most affected? (list below)

Chad Brown, Admiral Terrace, Manton Heights, Hartford Park, Dexter Manor 1 and 2

**B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year**

1. List the crime prevention activities the PHA has undertaken or plans to undertake: (select all that apply)

- Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
- Crime Prevention Through Environmental Design
- Activities targeted to at-risk youth, adults, or seniors
- Volunteer Resident Patrol/Block Watchers Program
- Other (describe below)

Resident Training Programs

2. Which developments are most affected? (list below)

All Providence Housing Authority Developments

**C. Coordination between PHA and the police**

1. Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- Police provide crime data to housing authority staff for analysis and action
- Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- Police regularly testify in and otherwise support eviction cases
- Police regularly meet with the PHA management and residents
- Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- Other activities (list below)



Designation of a special "Public Housing Unit" with a police substation the Hartford Park family development by the Providence Police Department.

2. Which developments are most affected? (list below)

All Providence Housing Authority Developments

**D. Additional information as required by PHDEP/PHDEP Plan**

PHAs eligible for FY 2000 PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

Yes  No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?

Yes  No: Has the PHA included the PHDEP Plan for FY 2000 in this PHA Plan?

Yes  No: This PHDEP Plan is an Attachment.

(Attachment Filename: **ri001a01**)

**14. RESERVED FOR PET POLICY**

[24 CFR Part 903.7 9 (n)]

**22.5      *Pets***

The Pet Policy is applicable to all resident families who live in PHA housing. Before housing a pet(s) in his/her unit, a resident must acquire PHA authorization by completing a Pet Agreement. A maximum of two (2) pets per unit is allowed, only one of which can be a dog. The PHA will allow only domesticated dogs, cats, birds, and fish. All dogs and cats must be neutered. Any animal deemed to be potentially harmful, including attack or fight-trained dogs, will not be approved. Animals expected to exceed thirty (30) pounds in weight at maturity will not be approved.

A separate deposit of \$300.00, or one month's rent (whichever is less) is required for each pet, except caged birds or fish in a tank of thirty gallons or less. This deposit may be paid in advance or through a payment plan that requires \$50.00 upon approval of the Pet Authorization and \$10.00 per month until the Pet Deposit is paid in full. The deposit will be refunded when the pet has been removed from the household and the Housing Manager inspects the unit for pet damage.

Owners must house pets in their apartments (no outdoor cages may be constructed) and must keep the pets on leashes when outside of the unit. Pets must be maintained in a manner that prevents odors and any other unsanitary conditions in the owner's unit and surrounding areas.

Pet owners will be required to remove pets from their units if the Management Office receives repeated complaints from neighbors or PHA personnel regarding excessive noise, bad odors, animal waste, or other forms of nuisance. Each time a pet owner fails to pick-up waste delivered by his/her pet from surrounding areas, he/she will be assessed a \$5.00 pet-waste-removal charge. Any pet-related insect infestation in the pet owner's unit is the financial responsibility of the pet's owner; when this occurs, the PHA reserves the right to exterminate and charge the resident.

No terms of the pet policy apply to animals that are certified to assist persons with disabilities, however, tenants must ensure that their pets do not disrupt their units or disturb their neighbors.

**15. Civil Rights Certifications**

[24 CFR Part 903.7 9 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

**16. Fiscal Audit**

[24 CFR Part 903.7 9 (p)]

1.  Yes  No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?  
(If no, skip to component 17.)
2.  Yes  No: Was the most recent fiscal audit submitted to HUD?
3.  Yes  No: Were there any findings as the result of that audit?
4.  Yes  No: If there were any findings, do any remain unresolved?  
If yes, how many unresolved findings remain? \_\_\_\_\_
5.  Yes  No: Have responses to any unresolved findings been submitted to HUD?  
If not, when are they due (state below)?

**17. PHA Asset Management**

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

1.  Yes  No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock, including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?
2. What types of asset management activities will the PHA undertake? (select all that apply)
  - Not applicable
  - Private management
  - Development-based accounting
  - Comprehensive stock assessment
  - Other: (list below)
3.  Yes  No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

**18. Other Information**

[24 CFR Part 903.7 9 (r)]

**A. Resident Advisory Board Recommendations**

1.  Yes  No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)

Attached at Attachment (File name)

Provided below (RAB comments are included with PHA responses below.)

**Resident Comment One:**

Resident noted that her name was spelled wrong in the draft report.

**PHA Response to resident Comment One**

Correction was made.

**Resident Comment Two:**

Resident expressed concern that electronic submission should be backed up with a hard copy version of the plan in case of technical problems.

**PHA Response to Resident Comment Two:**

A hard copy of the plan will be delivered to the local office along with the original copies of the required certifications.

3. In what manner did the PHA address those comments? (select all that apply)

Considered comments, but determined that no changes to the PHA Plan were necessary.  
(Resident comments and PHA responses included)

The PHA changed portions of the PHA Plan in response to comments  
List changes below:

Other: (list below)

**B. Description of Election process for Residents on the PHA Board**

1.  Yes  No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)

2.  Yes  No: Was the resident who serves on the PHA Board elected by the residents?  
(If yes, continue to question 3; if no, skip to sub-component C.)

3. Description of Resident Election Process

a. Nomination of candidates for place on the ballot: (select all that apply)

- Candidates were nominated by resident and assisted family organizations  
 Candidates could be nominated by any adult recipient of PHA assistance  
 Self-nomination: Candidates registered with the PHA and requested a place on ballot  
 Other: (describe)

b. Eligible candidates: (select one)

- Any recipient of PHA assistance  
 Any head of household receiving PHA assistance  
 Any adult recipient of PHA assistance  
 Any adult member of a resident or assisted family organization  
 Other (list)

Any resident in "good standing" (not on eviction status).

c. Eligible voters: (select all that apply)

- All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)  
 Representatives of all PHA resident and assisted family organizations  
 Other (list)

**C. Statement of Consistency with the Consolidated Plan**

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: (provide name here) City of Providence, RI
2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

The City of Providence's 2000 Consolidated Plan lists the following housing priorities in its Housing and Community Development Strategic Plan (page IV-21).

1. Create a Metropolitan are-wide Assessment of Fair Housing Choice process to address all affordable housing issues including testing of rental and sales of property, mortgage discrimination, and insurance discrimination.
2. Increase quality infrastructure, specifically in schools, housing and the streets.
3. Production of a mix of rental and homeownership units.
4. Moderate-income assistance, above 80% median income
5. Increased operating funds for Community Development Corporations
6. Create assisted living for low and moderate income elderly
7. Priority for all extremely low income households (0-30% MFI)
8. Homeownership

The Consolidated plan also includes a section concerning Public Housing in the city including subsections addressing the PHA's Management and Operations and the Resident Living Environment.

#### **D. Other Information Required by HUD**

Use this section to provide any additional information requested by HUD.

#### **Definition of "Substantial Deviation" or Significant Amendment".**

The Providence Housing Authority has defined a "significant amendment" or a "substantial deviation" as any change in a policy that adversely affects the standing of any resident for admissions to, or continued occupancy in public housing for reasons other than noncompliance with an existing lease. It further means any substantial change in a program's line item amount that is in excess of 20% of the budgeted amount. This definition excludes changes in policy and programming required by Congress, the Department of Housing & Urban Development or any other Local, State or Federal agencies for which the PHA has no discretionary authority.

## **Attachments**

### **Attachments Included Below**

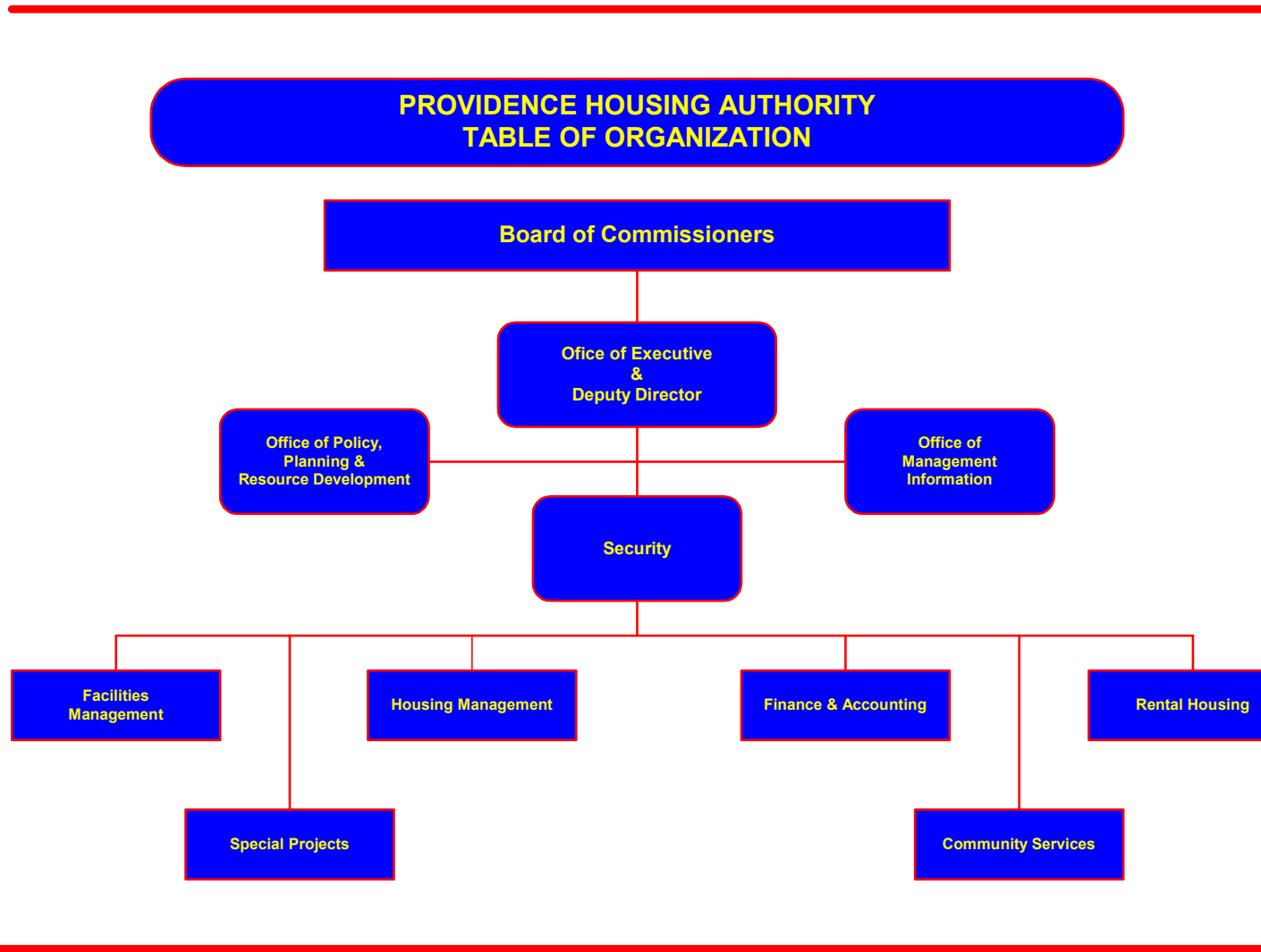
1. PHA Management Organizational Chart
2. De-Concentration Policy
3. Community Service Requirement Policy Statement
4. Pet Policy
5. Residents on the PHA Governing Board
6. Residents on the PHA Resident Advisory Board
7. Plans to address issues from the PHAS resident survey
8. Capital Fund Program Annual Statement/P&E Report Parts I-III
9. Comments from the Public Meeting and PHA Response

### **Separate Attachments**

1. Public Housing Drug Elimination Program (PHDEP) Plan (**ri001a01**)
2. FY 2000 Capital Fund Program Five Year Statements (**ri001b01**)
3. Progress on Five Year Plan (**ri001c01**)

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**De-concentration Policy****The Providence Housing Authority's Housing Management Administrative Plan**

The Providence Housing Authority's Housing Management Administrative Plan currently states:

**11.12 De-concentration Policy**

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

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

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

**11.13 DE-CONCENTRATION INCENTIVES**

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

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

**Board Resolution 4059**

Providence Housing Authority Board Resolution 4059 passed on January 29<sup>th</sup>, 1998 states:

**WHEREAS**, The Department of Housing and Urban Development and the Congress are promoting "mixed incomes" in public housing; and

**WHEREAS**, there is an increasing housing burden placed on low-income working families in this city.

**NOW, THEREFORE**, The Board of Commissioners implements a local preference for working families equal to twenty-five (25%) percent of new admissions.

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## Community Service Requirement Policy

### 17.1 GENERAL

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Per the Quality Housing and Work Responsibility Act (QHWRA), the PHA is implementing a Community Services requirement for residents. To be eligible for continued occupancy, each adult family member must:

- contribute eight hours per month of community service (not including political activities) within the community in which the public housing development is located; or
- participate in an economic self-sufficiency program unless they are exempt from this requirement.

The PHA's Community Service Program is accessible for persons with disabilities.

### 17.2 EXEMPTIONS

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The following adult family members of tenant families are exempt from the community service requirement:

- Family members who are 62 or older;
- Family members who are blind or disabled;
- Family members who are the primary care giver for someone who is blind or disabled;
- Family members engaged in a work activity (as defined by Section 407(d) of the Social Security Act);
- Family members who are exempt from a work activity under part A title IV of the Social Security Act or under any other State welfare program, including the welfare-to-work program; or
- Family members receiving assistance under a State program funded under part A title IV of the Social Security Act or under any other State welfare program, including welfare-to-work and who are in compliance with that program.

The PHA will re-verify an adult's exemption status annually. If a person's exemption status changes during the year he/she must notify the PHA within five days.

Persons eligible for the disability deduction are not automatically exempt from community service or economic self sufficiency requirements. The QHWRA states that a person is exempt only to the extent the disability makes the person unable to comply with the community service requirement.

The PHA must document all exemptions in residents' files. Doctor's letters must be submitted for medical or disability exemptions.

### 17.3 NOTIFICATION OF THE REQUIREMENT

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The PHA shall identify all adult family members who are apparently not exempt from the community service requirement.

The PHA shall notify all such family members of the community service requirement and of the categories of individuals who are exempt from the requirement. The notification will provide the opportunity for family members to claim and explain an exemption status. The PHA shall verify such claims.

The notification to family members will advise them that their community service obligation will begin upon the effective date of their first annual reexamination on or after October 1, 2000. For family's paying a flat rent, the obligation begins on the date their annual reexamination would have been effective had an annual reexamination taken place. It will also advise them that failure to comply with the community service requirement will result in ineligibility for continued occupancy at the time of any subsequent annual reexamination.

### 17.4 VOLUNTEER OPPORTUNITIES

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**Community Service** includes performing work or duties in the public benefit that serve to improve the quality of life and/or enhance resident self-sufficiency, and/or increase the self-responsibility of the resident within the community.

An **Economic Self Sufficiency Program** is one that is designed to encourage, assist, train or facilitate the economic independence of participants and their families or to provide work for participants. These programs may include programs for job training, work placement, basic skills training, education, English proficiency, work fare, financial or household management, apprenticeship, and any program necessary to ready a participant to work (such as substance abuse or mental health treatment).

The PHA will coordinate with social service agencies, local schools, and the Human Resources Office in identifying a list of volunteer community service positions.

Together with the resident advisory councils, the PHA may create volunteer positions such as hall monitoring, litter patrols, and supervising and record keeping for volunteers.

#### 17.5 IMPLEMENTATION REQUIREMENTS

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At the first annual reexamination on or after October 1, 2000, and each annual reexamination thereafter, the PHA will do the following:

- ♦ Provide a list of volunteer opportunities to family members.
- ♦ Provide information about obtaining suitable volunteer positions.
- ♦ Provide volunteer time sheets to the family members. Instructions for the time sheet require an individual to complete the form and have a supervisor date and sign it for each period of work.
- ♦ Assign family members to a volunteer coordinator who will assist the family members in identifying appropriate volunteer positions and in meeting their responsibilities. The volunteer coordinator will track the family's progress monthly and will meet with family members as needed to best encourage compliance.
- ♦ Thirty (30) days before the family's next lease anniversary date, the volunteer coordinator will advise the PHA as to whether each applicable adult family member is in compliance with the community service requirement.

#### 17.6 NOTIFICATION OF NON-COMPLIANCE

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The PHA may not renew or extend the lease if a household contains a nonexempt adult who has failed to comply with the community service requirement. The PHA will notify any family found to be in noncompliance of the following:

- ♦ The family member(s) that has been determined to be in noncompliance;
- ♦ That the determination is subject to the grievance procedure; and
- ♦ That, unless the family member(s) enter into an agreement to comply, the lease will not be renewed or will be terminated;

#### 17.7 OPPORTUNITY FOR CURE

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The PHA will offer the family member(s) the opportunity to enter into an agreement prior to the anniversary of the lease. The agreement shall state that the family member(s) agrees to enter into an economic self-sufficiency program or agrees to contribute to community service for as many hours as needed to comply with the requirement over the past 12-month period. The cure shall occur over the 12-month period beginning with the date of the agreement and the resident shall at the same time stay current with that year's community service requirement. The first hours a resident earns goes toward the current commitment until the current year's commitment is made.

Continued noncompliance will result in eviction of the entire family, unless the noncompliant family member is no longer a part of the household.

## **Pet Policy**

The Pet Policy is applicable to all resident families who live in PHA housing. Before housing a pet(s) in his/her unit, a resident must acquire PHA authorization by completing a Pet Agreement. A maximum of two (2) pets per unit is allowed, only one of which can be a dog. The PHA will allow only domesticated dogs, cats, birds, and fish. All dogs and cats must be neutered. Any animal deemed to be potentially harmful, including attack or fight-trained dogs, will not be approved. Animals expected to exceed thirty (30) pounds in weight at maturity will not be approved.

A separate deposit of \$300.00, or one month's rent (whichever is less) is required for each pet, except caged birds or fish in a tank of thirty gallons or less. This deposit may be paid in advance or through a payment plan that requires \$50.00 upon approval of the Pet Authorization and \$10.00 per month until the Pet Deposit is paid in full. The deposit will be refunded when the pet has been removed from the household and the Housing Manager inspects the unit for pet damage.

Owners must house pets in their apartments (no outdoor cages may be constructed) and must keep the pets on leashes when outside of the unit. Pets must be maintained in a manner that prevents odors and any other unsanitary conditions in the owner's unit and surrounding areas.

Pet owners will be required to remove pets from their units if the Management Office receives repeated complaints from neighbors or PHA personnel regarding excessive noise, bad odors, animal waste, or other forms of nuisance. Each time a pet owner fails to pick-up waste delivered by his/her pet from surrounding areas, he/she will be assessed a \$5.00 pet-waste-removal charge. Any pet-related insect infestation in the pet owner's unit is the financial responsibility of the pet's owner; when this occurs, the PHA reserves the right to exterminate and charge the resident.

No terms of the pet policy apply to animals that are certified to assist persons with disabilities, however, tenants must ensure that their pets do not disrupt their units or disturb their neighbors.

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**Residents on PHA Governing Board**

Current Resident Commissioners:

Dorothy Watters            Codding Court  
Delores Cascella        Dominica Manor

For more details, including appointment information please see section 18 B of this plan. Resident Commissioners serve for five-year terms. Members may be reappointed.

**Residents on PHA Resident Advisory Board**

Ms. April Levesque	Admiral Terrace
Ms. Theresa Robinson	Chad Brown
Mr. Angelo Adams	Manton Heights
Ms. Diane Tutt	Roger Williams
Ms. Kathleen Wood	Dexter Manor
Ms. Annie Kelly	Kilmartin Plaza
Mr. James Mulvaney	Parenti Villa
Ms. Josephine Smith	Carroll Tower
Ms. Jeanne Russell	Hartford Park
Ms. Gilberta Taylor	Hartford
Ms. Joanne Logan	Section 8
Ms. Deborah Wray	Hartford Park
Ms. Delores Cascella	Dominica Manor
Ms. Debra Jones	Codding Court
Ms. Julie Lozada	Section 8

For more details please see section 18 B of this plan

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## **Plans to Address Items in the Real Estate Assessment Center Customer Service and Satisfaction Survey**

During the summer of 2000, the Department of Housing and Urban Development's Real Estate Assessment Center conducted a survey of public housing residents in Providence. Of the 279 surveys sent, 91 were returned. The Survey was divided into five separate sections each of which received a score from 0-100 with 100 being very satisfied and 0 being very dissatisfied. Of the five sections the PHA received the following scores:

- Maintenance and Repair 90.8
- Communication 73.6
- Safety 65.0
- Services 80.8
- Neighborhood Appearance 70.5

For each section that received a score less than 75, housing authorities were required to prepare a follow-up plan illustrating how these would be dealt with. During the summer the PHA completed its five-year strategic plan which addressed these issues. The following are the objectives in that plan that pertain to the three sections of the REAC survey for which the PHA scored below 75.

### **Communication**

This section focused on the degree of communication between management and residents. While questions did cover responsiveness they did not include communication concerning maintenance and repair situations. The questions also covered PHA support of and resident participation in resident associations. The overall PHA score for this section was 73.6%, just below the 75% threshold. The following objectives pertain to this section of the REAC survey.

### **Housing Management**

#### **GOAL PROVIDE IMPROVED CUSTOMER SERVICE BY MAINTAINING NON-TRADITIONAL HOURS FOR THE RESIDENT SELECTION OFFICE**

- Objective 1: Research and determine if non-traditional hours should be scheduled to better serve the families on the public housing waiting list by June 2000
- Objective 2: Conduct an outreach campaign to inform applicants of appointments during non-traditional hours

### **Special Projects**

#### **GOAL ENSURE A CUSTOMER FOCUS AND FISCAL RESPONSIBILITY IN PROGRAM ADMINISTRATION**

- Objective 1: Measure customer satisfaction in each programmatic element annually and revise goals and objectives starting May 2000
- Objective 2: Establish interdepartmental team to address and track issues that cross departmental lines by July 2000 to meet monthly.

### **Department of Community Services**

#### **Measure Effectiveness of Program Outcomes and Customer Satisfaction**

#### **GOAL PROVIDE INCREASINGLY APPROPRIATE PROGRAMMING AS A RESULT OF A CLEARER UNDERSTANDING OF RESIDENT NEED AND AN EFFECTIVE MEANS OF RECRUITMENT**

- Objective 1: Conduct an annual customer satisfaction survey to individual program and service participants starting August 2000.
- Objective 2: Determine and implement new methods of increasing resident awareness of programs and services, commencing November 2000.
- Objective 3: Develop more effective ways of recruiting program participants by November 2000.

#### **GOAL ENHANCE THE SENSE OF COMMUNITY AT EACH DEVELOPMENT THROUGH THE PROMOTION OF TENANT INVOLVEMENT**

- Objective 1: Work with resident associations or representatives, at each site, to sponsor two joint recreational activities, annually, commencing July 2000.
- Objective 2: Provide two coffee hours at each site, per month, to discuss issues of interest to residents commencing July 2000.
- Objective 3: Twice annually, conduct door-to-door outreach to 100% of occupied units, with a positive contact rate of 80%, commencing July 2000.
- Objective 4: Increase on-site meal site participation by 10% annually, Beginning July 2000.

**GOAL ENHANCE THE SENSE OF COMMUNITY, IN THE FAMILY DEVELOPMENTS, BY INCREASING TENANT INVOLVEMENT.**

- Objective 1: Sponsor, through the *Family Advisory Council*, a minimum of 2 community-building events each semester, effective October 2000.
- Objective 2: Ninety percent of parents with children enrolled in the after-school and/or summer *Youth Program* will comply with the *Parent Volunteer Program* requirement of four hours of community service per month, effective July 2000.
- Objective 3: Engage 50 adult residents at each site in one monthly social or recreational event for 8 months, October through May, effective October 2000.
- Objective 4: Sponsor, through the *Youth Service Council*, a minimum of two community service projects per semester, commencing in October, effective October 2000.
- Objective 5: Enroll 75 per cent of *Youth Program* participants in one or more organized *Sports Program* activities, annually, commencing October 2000.

**Office the Executive Director**  
**Resident Participation**

**GOAL INCREASE RESIDENT PARTICIPATION IN PHA AFFAIRS:**

- Objective 1: Create a Resident Advisory Board (RAB) by February 2000
- Objective 2: Conduct briefings for the RAB quarterly (J/A/J/O)
- Objective 3: Increase the number of certified resident associations by 50% by December 2000
- Objective 4: Ensure there are certified resident associations at all developments by December 2001
- Objective 5: Sponsor informational briefings and/or social events to encourage resident participation in a certified resident association every other month starting July 2000
- Objective 6: Conduct an annual resident association development program by June 2001
- Objective 7: Conduct training sessions for resident associations quarterly (or when requested)
- Objective 8: Establish a database to track the number of meetings and issues raised by residents at monthly Resident/Management meetings by July 2000
- Objective 9: Conduct semi-annual Resident/Senior staff meetings at all developments starting April 2000

**GOAL CONDUCT SURVEYS TO DETERMINE RESIDENT NEEDS AND MEASURE THE EFFECTIVENESS OF PHA OPERATIONS.**

- Objective 1: Conduct a needs assessment survey of family, elderly and elderly/disabled development heads of household and youth in the summers of 2001, 2003 and 2005. (Reports to be completed by December of each year).
- Objective 2: Conduct a customer service survey of Section 8 residents and landlords in 2002 and 2004. (Reports to be completed by October of each year).
- Objective 3: Conduct a survey of scattered site residents and their neighbors in the summers of 2002 and 2004. (Reports to be completed by November of each year).
- Objective 4: Develop a brief, annual resident survey instrument to measure the PHA's success in meeting outcome measures and implement annually starting in January 2001

**Safety**

This section focused on the level of safety that resident feel exists in their development, the factors that contribute to safety issues, and the crime prevention programs currently in place regarding safety. The section also covers eviction of residents who break the lease. The PHA scored 65 on this section.

**SECURITY****ENHANCE SECURITY AT ALL PHA DEVELOPMENTS****GOAL      ASSESS MANPOWER REQUIREMENTS FOR THE PHU/PHA SECURITY FORCE:**

- Objective 1: Conduct manpower assessment review by July 1, 2000
- Objective 2: Review and determine the feasibility of having the PPD increase the number of patrolmen assigned to the Public Housing Unit by December 2000
- Objective 3: Seek additional funding to increase (3 hours) the daily tour of PHU officers
- Objective 4: Seek additional funding to extend the hours (2 additional hours) of PHA Security Officers (high-rise)
- Objective 5: Increase the number of foot patrols at both family and elderly/disabled developments by May 2000

**GOAL      ADDRESS CRIME IN PUBLIC HOUSING**

- Objective 1: Conduct criminal background checks of all prospective PHA applicants daily for Resident Selection Office
- Objective 2: Identify type and location of crime in the elderly/disabled developments annually commencing July 2000
- Objective 3: Identify type and location of crimes involving youths in the development by July 1, 2000
- Objective 4: Identify type and location of crime in the family developments annually commencing July 2000
- Objective 5: Research and produce a PHA Security Operations Plan for all developments by July 2000

**GOAL      INCREASE POLICE VISIBILITY AND OPERATIONS IN A PROBLEM AREA/DEVELOPMENT**

- Objective 1: Adopt a "Zero Tolerance" stand in the targeted development/area effective immediately
- Objective 2: Reallocate manpower to deal with increased crime to act as needed by December 2000
- Objective 3: Evaluate PHU patrol practices and the areas being patrolled annually beginning July 2000
- Objective 4: Conduct Police Reserve monthly meeting at different developments each month effective next month

**TIMELY INFORMATION SENT TO DECISION MAKERS****GOAL      PROVIDE INFORMATION ABOUT CRIMINAL ACTIVITY TO KEY DECISION MAKERS**

- Objective 1: Meet (Security Operations Manager) with Executive Director at least once a week to discuss security issues
- Objective 2: Attend at least four resident-management meetings per development annually
- Objective 3: Attend Housing Management and Facilities Management Departments staff meetings at least once a month
- Objective 3: Review and determine the best method for Housing management and Facilities Management personnel to provide information about crime-related activities to the PHU by July 2000
- Objective 4: E-mail arrests at PHA developments to site managers daily by May 2000

**GOAL      CONDUCT OR COMMISSION TIMELY REPORTS/STUDIES TO ASSIST IN ASSESSING CRIME AND PERFORMANCE**

- Objective 1: Conduct security/victimization survey of residents in relation to security issues annually by November 2000
- Objective 2: Produce a weekly police/security activity report effective immediately
- Objective 3: Produce a monthly police/security activity report effective immediately
- Objective 4: Produce an annual Security Operations Report (both calendar and fiscal years) effective immediately
- Objective 5: Seek HUD technical assistance funds to contract with a professional security analyst to a security assessment of all developments by September 2001
- Objective 6: Conduct an annual Equipment Needs Assessment annually
- Objective 7: Conduct a Vehicle Needs Assessment annually
- Objective 8: Conduct a security analysis including crime prevention through environmental design by 2002

- Objective 9: Identify Primary and Repeat Offenders by July 2000  
Objective 10: Identify and map crime locations in PHA family developments  
July 2000

### **Improve Image of Security Personnel**

**GOAL IMPROVE COMMUNITY RELATIONS**

- Objective 1: Sponsor Hot Dog Roast at all family developments annually beginning June 2000  
Objective 2: Sponsor 150 Turkey baskets for residents annually  
Objective 3: Sponsor a Toy Drive for the children of the developments annually  
Objective 4: Sponsor a law enforcement careers workshop for PHA residents by June 2001

### **CRIME PREVENTION INFORMATION**

**GOAL INFORM RESIDENTS AND STAFF ON CRIME PREVENTION**

- Objective 1: Conduct two crime prevention workshops annually for site staff by July 2000  
Objective 2: Conduct one crime prevention workshop for administrative staff annually beginning November 2000  
Objective 3: Conduct at least one crime prevention workshop annually at each high-rise development with PHA security personnel  
Objective 4: Conduct two crime prevention workshops annually at each high-rise development with third-party Law Enforcement Agencies  
Objective 5: Research, develop and produce a security brochure for distribution to all PHA residents by July 2001  
Objective 6: Conduct a crime prevention presentation at each Preparation for Community Living class for prospective residents  
Objective 7: Write a security-related article for the PHA resident newsletter at least twice a year

### **Housing Management**

**GOAL ENSURE THAT ALL APPLICANTS TO PUBLIC HOUSING ARE PROPERLY SCREENED FOR QUALIFICATIONS AND ACCEPTABILITY**

- Objective 1: Conduct a criminal background check on all applicants to public housing prior to office appointment  
Objective 2: Conduct a "home visit" of each prospective resident to family public housing  
Objective 3: Examine the feasibility and/or need of conducting home visits for prospective residents of Elderly/disabled and elderly-only housing developments by September 2000  
Objective 4: Conduct at least two landlord references for every prospective resident to public housing

### **Neighborhood Appearance**

This section covered issues dealing with the appearance of public housing developments and various factors that would contribute to problems in this area such as graffiti, noise, broken glass and vacant units. The PHA scored 70.5 on this category.

### **Housing Management**

#### **GOAL CONDUCT INSPECTIONS OF ALL PHA PROPERTY ANNUALLY**

- Objective 1: Conduct a Housing Quality Inspection of each unit annually  
Objective 2: Prepare a unit inspection schedule for each unit at each development by July of each year

#### **GOAL ENSURE HIGH LEVELS OF CUSTOMER SERVICE AT ALL DEVELOPMENTS**

- Objective 1: Revise Resident Complaint Forms by July 2000  
Objective 2: Develop an Access database at each development to track customer complaints by December 2000  
Objective 3: Respond to customer complaints within 48 hours of receipt of the complaint  
Objective 4: Conduct resident-management meetings each month at each development  
Objective 5: Prepare resident-management meeting minutes and forward to the Executive Director for review within three days of meeting

#### **GOAL PROMOTE THE "SELF-MANAGEMENT" OF SCATTERED-SITE UNITS BY RESIDENTS**

- Objective 1: Create a "self-help" guide for scattered site residents by July 2001  
Objective 2: Create and produce "How to be a Good Neighbor" brochure for distribution to scattered-site families by December 2000

### **Facilities Management**

#### **GOAL INSURE THAT ALL WORK ACCOMPLISHED BY FM MAINTENANCE EMPLOYEES IS OF A HIGH QUALITY, DONE RIGHT THE FIRST TIME.**

- Objective 1: Perform a systematic review of quality control policies for all maintenance services by November 2000  
Objective 2: Create an independent position within the department responsible for insuring that quality control standards are met on all jobs and tasks by December 2000  
Objective 3: Institute an internal quality control program for all maintenance employees by March 2001

#### **GOAL ESTABLISH A DEPARTMENTAL MIS INFORMATION SYSTEMS FOR IMPROVED EFFICIENCY AND PHA-WIDE NETWORKING.**

- Objective 3: Create a stand alone database to track information related to bidding and contracts in conjunction with Capital Fund expenditures August 2000  
Objective 4: Complete the conversion of work order, and inventory control systems to the AS400 system by December 2000  
Objective 5: Create one central ACCESS database which contains physical needs data, capital projects information, major systems inventory and warranty information by April 2001

#### **GOAL REVIEW AND REVISE MAINTENANCE POLICIES AND PROCEDURES AND DEVELOP WRITTEN PROTOCOLS SPECIFIC TO EACH SITE, FOR BOTH THE OPERATION & MAINTENANCE OF PHA PROPERTY AND EQUIPMENT.**

- Objective 1: Identify the major building systems and equipment, which should be inspected and/or maintained by contract by May 2000  
Objective 2: Develop detailed maintenance protocol for grounds by July 2000  
Objective 3: Develop detailed maintenance protocol for all Authority equipment by November 2000  
Objective 4: Develop detailed maintenance protocol for all structures and building envelopes by February 2001  
Objective 5: Develop detailed maintenance protocol for all major building systems by April 2000  
Objective 6: Develop detailed maintenance protocol for all janitorial and custodial duties by May 2000  
Objective 7: Develop detailed maintenance protocol for all unit preventative maintenance and frequently used tenant service work orders by August 2001

#### **GOAL ENHANCE THE PHYSICAL SECURITY OF RESIDENTS IN PHA PROPERTIES.**

- Objective 1: Conduct a comprehensive exterior lighting survey of each Elderly/Handicapped Building and recommend lighting improvements to enhance security by August 2000
- Objective 2: Install intercom systems from apartment to entrance door at Sr. Dominica Manor and Dexter Manor by August 2000
- Objective 3: Install card access systems in all PHA high-rise buildings by October 2000
- Objective 4: Conduct a comprehensive exterior lighting survey of each Family Development and recommend lighting improvements to enhance security by December 2000
- Objective 5: Install video systems in PHA high rise buildings which would allow residents to monitor visitors seeking entry into the building using the intercom system by March 2000

**GOAL DEVELOP POLICIES AND PROGRAMS TO EXPAND RESIDENT AWARENESS OF MAINTENANCE REQUIREMENTS AND IDENTIFY AREAS WHERE RESIDENT'S WOULD PARTICIPATE IN COMMON AREA MAINTENANCE.**

- Objective 1: Develop a plan with the Management Department to involve residents in the maintenance of common spaces in their buildings by September 2000
- Objective 2: Create a mechanism to periodically inform residents of maintenance issues and update them on site specific problems needing their attention by December 2000

**Department of Community Services**

**GOAL OFFER EDUCATIONAL PROGRAMS THAT ENCOURAGE PERSONAL GROWTH AND POSITIVE COMMUNITY INVOLVEMENT**

- Objective 1: Study the feasibility of requiring mandatory pre-occupancy *Preparation for Community Living* classes for elderly/disabled residents by July 2001.
- Objective 2: Develop a *Preparation for Community Living* class for the elderly and disabled applicants (residents) effective January 2002.

**GOAL OFFER INTERVENTION PROGRAMS AND SERVICES THAT HELP AT RISK RESIDENTS IMPROVE THEIR LIFESTYLE AND THEREBY MAINTAIN THEIR TENANCY**

- Objective 1: Decrease resident recidivism in the *Housekeeping Support Program* by 5% annually, commencing July 2001.
- Objective 3: Increase the number of hours of housekeeping services available to the elderly and disabled residents by 25% annually, effective July 2001.



**CAPITAL FUND PROGRAM TABLES START HERE**

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary					
PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RHODE ISLAND		Grant Type and Number Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:		Federal FY of Grant: 2000	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:    ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 12/31/00 <input type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations	900,000		900,000	5,898
3	1408 Management Improvements Soft Costs	232,441		194,941	0
	Management Improvements Hard Costs				
4	1410 Administration	622,766		622,766	0
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	241,000		81,000	0
8	1440 Site Acquisition				
9	1450 Site Improvement	319,750		0	0
10	1460 Dwelling Structures	2,036,955		0	0
11	1465.1 Dwelling Equipment—Nonexpendable	4,750		0	0
12	1470 Nondwelling Structures	123,750		0	0
13	1475 Nondwelling Equipment	261,250		46,170	9,776
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs	5,000		0	0
18	1499 Development Activities				
19	1502 Contingency				

**Annual Statement/Performance and Evaluation Report  
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1:  
Summary**

<b>PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RHODE ISLAND</b>	<b>Grant Type and Number</b> Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:	<b>Federal FY of Grant: 2000</b>
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Original Annual Statement  Reserve for Disasters/ Emergencies  Revised Annual Statement (revision no: )  
 Performance and Evaluation Report for Period Ending: 12/31/00  Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost	Total Actual Cost	Total Actual Cost
	Amount of Annual Grant: (sum of lines.....)	4,747,662		1,844,877
	Amount of line XX Related to LBP Activities	15,000		0
	Amount of line XX Related to Section 504 compliance	23,000		0
	Amount of line XX Related to Security --Soft Costs	0		0
	Amount of Line XX related to Security--Hard Costs	58,000		0
	Amount of line XX Related to Energy Conservation Measures	248,800		0
	Collateralization Expenses or Debt Service			0

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part II: Supporting Pages									
PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RI			Grant Type and Number Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:				Federal FY of Grant: 2000		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
				Original	Revised	Obligated	Expended		
Chad Brown 001	Site Improve.-Fence/Walks/Paving	1450	N/A	10,000		0	0		
	Landscaping	1450	N/A	10,000		0	0		
	Repair Steam Lines	1450	N/A	35,000		0	0		
	Repoint/Seal Exterior Masonry	1460	10 Bldgs.	60,000		0	0		
	Replace Interior Doors	1460	19 Doors	1,995		0	0		
	Kitchens-Cabinets/Countertops	1460	15 Units	22,500		0	0		
	Install GFI's in Kitchens	1460	N/A	5,000		0	0		
	Baseboard Upgrade	1460	15 Units	3,000		0	0		
	Bathroom Renovations	1460	15 Units	6,000		0	0		
	Appliance Purchases	1465	15 Units	12,750		0	0		
	Fire Hoses & Extinguishers	1475	N/A	1,000		0	0		
					167,245		0	0	
	Admiral Terrace 001A	Site Improve.-Concrete Sidewalks	1450	N/A	15,000		0	0	
Fence/Pavement/Furniture		1450	N/A	10,000		0	0		
Landscaping		1450	N/A	10,000		0	0		
Repair Steam Lines		1450	N/A	20,000		0	0		
Repoint/Seal Exterior Masonry		1460	N/A	50,000		0	0		
Replace Interior Doors		1460	20 Doors	4,000		0	0		
Kitchens-Cabinets/Countertops		1460	15 Units	22,500		0	0		
Circulating Pump/Condensate Tank		1460	1 Tank	10,000		0	0		
Bathroom Renovations		1460	15 Units	6,000		0	0		
Baseboard Upgrade in Bathrooms		1460	15 Units	3,000		0	0		
Appliance Purchases	1465	15 Units	12,750		0	0			
				163,250		0	0		

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>									
PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RI			<b>Grant Type and Number</b> Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:				<b>Federal FY of Grant: 2000</b>		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost Original	Revised	Total Actual Cost Obligated Expended		Status of Work
Roger Williams	Site Improve.- Fence/Walks/Paving		1450	N/A	10,000		0	0	
002	Landscaping		1450	N/A	15,000		0	0	
	Paving/Seal Coat Parking Lot		1450	N/A	20,000		0	0	
	Exterior Lights		1450	N/A	4,000		0	0	
	Renovate Building Exterior		1460	N/A	140,000		0	0	
	Kitchens- Cabinets/Countertops		1460	14 Units	21,000		0	0	
	Install Mortise Locks		1460	15 Locks	3,000		0	0	
	Replace Interior Doors		1460	25 Doors	5,000		0	0	
	Common Hallway Lighting		1460	2 Bldgs.	4,000		0	0	
	Water Conservation Devices		1460	40 Units	2,800		0	0	
	Upgrade Domestic Hot Water		1460	1 Bldg.	5,000		0	0	
	Replace Water Supply Shutoffs		1460	40 Units	3,000		0	0	
	Install Backflow Valves		1460	2 Bldgs.	6,000		0	0	
	Bathroom Renovations		1460	14 Units	4,800		0	0	
	Replace Exterior Vent Covers		1460	N/A	1,200		0	0	
	Refrigerator Replacement		1465	14 Units	4,000		0	0	
					248,800		0	0	

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>								
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Development Number Name/HA- Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost Original	Revised	Total Actual Cost Obligated Expended	Status of Work

**Annual Statement/Performance and Evaluation Report  
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)  
Part II: Supporting Pages**

PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RI		Grant Type and Number Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:				Federal FY of Grant: 2000			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost Original	Revised	Total Actual Cost Obligated	Expended	Status of Work
Hartford Park	Repair/Retile Playgrounds		1450	N/A	10,000		0	0	
004/006/019	Exterior Lighting Replacement		1450	25 Fixtures	7,500		0	0	
	Exterior Lighting Security Shields		1450	25 Shields	7,500		0	0	
	Paint Phase I Buildings		1460	N/A	100,000		0	0	
	New Entrances to D Building		1460	2 Bldgs.	80,000		0	0	
	Water Conservation Devices		1460	294 Units	20,000		0	0	
	Card Access/Intercom		1460	N/A	10,000		0	0	
	Install Bath Vent Fans		1460	52 Units	15,600		0	0	
	Install Backflow Valves		1460	3 Locations	20,000		0	0	
	Purchase Trash Compactor		1475	N/A	15,000		0	0	
	Community Room Furnishings		1475	N/A	5,000		0	0	
	Instant Oil/Water Separator		1470	N/A	10,000		0	0	
	Renovate Supply Area		1470	1 Area	50,000		0	0	
					350,600		0	0	
Manton Heights	Landscaping		1450	N/A	10,000		0	0	
005	New Areaway Covers		1460	8 Areaways	20,000		0	0	
	New Roofs on Wood Buildings		1460	2 Bldgs.	42,000		0	0	
	Penthouse and Roof Repairs		1460	N/A	40,000		0	0	
	Install Backflow Valves		1460	3 Locations	15,000		0	0	

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>									
PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RI			Grant Type and Number Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:				Federal FY of Grant: 2000		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost Original	Revised	Total Actual Cost Obligated	Expended	Status of Work
	Remove Aristix Ceilings		1460	25 Units	25,000		0	0	
	Install Prototype Vent Fan unit		1460	N/A	20,000		0	0	
	Admin/Bldg Com. Ctr. Renovation		1470	N/A	<u>20,000</u>		0	0	
					192,000		0	0	

**Annual Statement/Performance and Evaluation Report  
 Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)  
 Part II: Supporting Pages**

PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RI		Grant Type and Number Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:				Federal FY of Grant: 2000			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost Original	Revised	Total Actual Cost Obligated Expended		Status of Work
Dexter Manor I 008	Concrete Sidewalks		1450	N/A	9,000		0	0	
	Landscaping		1450	N/A	8,000		0	0	
	Install Railings in Halls		1460	2000 Lin. Ft.	10,000		0	0	
	Unit Locks		1460	N/A	2,000		0	0	
	Upgrade Kitchens		1460	8 Kitchens	8,800		0	0	
	Replace Resilient Floor Tile		1460	24 Units	14,400		0	0	
	Install GFI's in Kitchens and Baths		1460	51 Units	5,100		0	0	
	Install Energy Efficient Lighting		1460	29 Units	2,900		0	0	
	Replace Generator		1460	1 System	60,000		0	0	
	Asbestos Abatement		1460	17 Units	10,000		0	0	
	Deferred Painting		1460	15 Units	10,000		0	0	
	Replace Kitchen Faucets		1460	50 Units	3,500		0	0	
	Replace Water Supply Shutoffs		1460	50 Units	6,250		0	0	
	Upgrade Baths on Turnaround		1460	15 Units	6,000		0	0	
	Upgrade Ventilation		1460	2 Motors	1,000		0	0	
	Purchase Trash Compactor		1475	N/A	15,000		0	0	



<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>								
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Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost Original	Revised	Total Actual Cost Obligated Expended	Status of Work
	Upgrade Common Space		1470	1 Lobby	<u>5,000</u>		0	0
					176,950		0	0

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>								
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Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost Original Revised		Total Actual Cost Obligated	Expended	Status of Work
Dominica Manor	Landscaping	1450	N/A	4,000		0	0	
009	Refinish/Replace Balcony Railings	1460	N/A	10,000		0	0	
	Refurbish Entrance Lobby	1460	N/A	30,000		0	0	
	Install Energy Efficient Lighting	1460	30 Units	3,000		0	0	
	Install GFI's in Kitchens and Baths	1460	50 Units	5,000		0	0	
	Water Conservation Devices	1460	204 Units	12,000		0	0	
	Asbestos Abatement	1460	20 Units	8,000		0	0	
	Replace Floor Tile	1460	20 Units	12,000		0	0	
	Replace Kitchen Faucets	1460	30 Units	2,800		0	0	
	Replace Water Supply Shutoffs	1460	40 Units	5,000		0	0	
	Upgrade Baths on Turnaround	1460	10 Units	4,000		0	0	
	Upgrade Ventilation	1460	1 System	40,000		0	0	
				138,500		0	0	
Carroll Tower	Design Fire Alarm System Upgrade	1430	N/A	10,000		0	0	
011	Underground Irrigation System	1450	N/A	20,000		0	0	
	Roof Replacement	1460	N/A	242,500		0	0	
	Kitchens-Cabinets/Countertops	1460	8 Units	12,000		0	0	

**Annual Statement/Performance and Evaluation Report**  
**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**  
**Part II: Supporting Pages**

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Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost Original Revised	Total Actual Cost Obligated	Expended	Status of Work
	New Accordian Doors		1460	72 Doors	7,200	0	0	
	Water Conservation Devices		1460	194 Units	14,000	0	0	
	Asbestos Abatement		1460	25 Units	10,000	0	0	
	Replace Kitchen Faucets		1460	50 Units	2,000	0	0	
	Replace Water Supply Shutoffs		1460	10 Units	1,250	0	0	
	Upgrade Baths on turnaround		1460	20 Units	8,000	0	0	
	Repair/Replace Ventilation System		1460	1 System	<u>45,000</u>	0	0	
					371,950	0	0	

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>									
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Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Obligated	Expended	
Kilmartin Plaza	Fence/Walks/Paving/Site Improve.		1450	N/A	5,000		0	0	
012	Install GFI's in Kitchens and Baths		1460	106 Units	21,200		0	0	
	Elevator Controller Upgrades		1460	2 Elevators	7,000		0	0	
	Ceiling Light Fixtures		1460	50 Units	5,000		0	0	
	Asbestos Abatement		1460	25 Units	10,000		0	0	
	Deferred Painting		1460	20 Units	10,000		0	0	
	Replace Water Supply Shutoffs		1460	20 Units	2,750		0	0	
	Upgrade Baths on Turnaround		1460	20 Units	8,000		0	0	
	Clean Ventilation System		1460	1 System	7,000		0	0	
	Upgrade Ventilation		1460	2 Motors	1,000		0	0	
					76,950		0	0	
Parenti Villa	Investigation of Building Exterior		1430	N/A	10,000		0	0	
013	Repave/Seal Coat Parking Lot		1450	N/A	25,000		0	0	
	Kitchens-Cabinets/Countertops		1460	8 Units	10,000		0	0	
	New Accordion Doors		1460	30 Units	3,000		0	0	
	Fire Alarm System Upgrade		1460	N/A	230,000		0	0	
	Water Conservation Devices		1460	204 Units	13,580		0	0	

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>									
PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RI			<b>Grant Type and Number</b> Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:				<b>Federal FY of Grant: 2000</b>		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost Original Revised		Total Actual Cost Obligated	Expended	Status of Work
	Asbestos Abatement		1460	12 Units	5,000		0	0	
	Replace Valves on Risers		1460	10 Valves	2,000		0	0	
	Replace Water Supply Shutoffs		1460	50 Units	6,250		0	0	
	Upgrade Baths on Turnaround		1460	10 Units	4,000		0	0	
	Repair/Replace Ventilation System		1460	1 Syatem	<u>45,000</u>		0	0	
					353,830		0	0	

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Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost Original	Revised	Total Actual Cost Obligated	Expended	Status of Work
Dexter Manor II	Upgrade Entrance-Common Space		1460	1 Entrance	5,000		0	0	
014	Replace Floor Covering		1460	21 Units	12,600		0	0	
	Install Energy Efficient Lighting		1460	29 Units	2,900		0	0	
	Upgrade Handicapped Units		1460	N/A	17,000		0	0	
	Retube Boilers		1460	1 Boiler	15,000		0	0	
	Clean Ventilation System		1460	1 System	10,000		0	0	
	Replace Motorized Dampers		1460	25 Units	7,500		0	0	
	Appliance Purchases		1465	10 Units	3,750		0	0	
					73,750		0	0	
Scattered Sites	Landscaping		1450	N/A	10,000		0	0	
017/021	Paint Buildings (1-17)		1460	8 Units	20,000		0	0	
	Paint Buildings (1-21)		1460	8 Units	20,000		0	0	
	Install Replacement Windows		1460	6 Units	10,000		0	0	
	Rebuild Porches		1460	10 Units	20,000		0	0	
	Install Vinyl Siding on Duplexes		1460	13 Units	150,000		0	0	
	Vinyl Flooring		1460	15 Units	15,000		0	0	
					245,000		0	0	

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>									
PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RI			<b>Grant Type and Number</b> Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:				<b>Federal FY of Grant: 2000</b>		
Development Number Name/HA- Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Obligated	Expended	

**Annual Statement/Performance and Evaluation Report**  
**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**  
**Part II: Supporting Pages**

PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RI		Grant Type and Number Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:				Federal FY of Grant: 2000			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Obligated	Expended	
Authority-Wide	Operations		1406	N/A	900,000		900,000	5,898	
	Computer System Software		1408	N/A	20,000		0	0	
	Economic Development		1408	N/A	10,000		0	0	
	Living Skills Coordinator		1408	N/A	49,941		49,941	0	
	Police		1408	N/A	125,000		125,000	0	
	Security Guards		1408	N/A	20,000		20,000	0	
	FM-Dept. Communication Systems		1408	N/A	7,500		0	0	
	CGP Administrative Costs		1410	N/A	474,766		474,766	0	
	In-House Design		1410	N/A	148,000		148,000	0	
	A&E Fees and Costs		1430	N/A	120,000		0	0	
	LBP/Asbestos Testing		1430	N/A	10,000		0	0	
	MOD Inspection Costs		1430	N/A	81,000		81,000	0	
	Utility Surveys		1430	N/A	10,000		0	0	
	Tree Pruning		1450	N/A	8,000		0	0	
	Asbestos Abatement		1460	N/A	11,500		0	0	
	Handicapped Unit Modifications		1460	N/A	8,000		0	0	
	LBP Abatement		1460	N/A	5,000		0	0	
	Appliance Purchases		1465	11 Units	10,000		0	0	



<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>									
PHA Name: THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RI			<b>Grant Type and Number</b> Capital Fund Program Grant No: RI 43 P001 50100 Replacement Housing Factor Grant No:				<b>Federal FY of Grant: 2000</b>		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Obligated	Expended	
	Computer Hardware		1475	N/A	25,000		36,394	0	
	Office Furnishings		1475	N/A	5,000		0	0	
	Radios/Accessories		1475	6 Radios	5,000		9,776	9,776	
	Relocation		1495	N/A	5,000		0	0	
					2,058,707		1,844,877	15,674	

**Annual Statement/Performance and Evaluation Report  
 Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)  
 Part III: Implementation Schedule**

PHA Name:		Grant Type and Number Capital Fund Program No: Replacement Housing Factor No:					Federal FY of Grant:	
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates	
	Original	Revised	Actual	Original	Revised	Actual		
Chad Brown	3/31/02			9/30/03				
Admiral Terrace	3/31/02			9/30/03				
Roger Williams	3/31/02			9/30/03				
Hartford Park	3/31/02			9/30/03				
Manton Heights	3/31/02			9/30/03				
Dexter Manor I	3/31/02			9/30/03				
Dominica Manor	3/31/02			9/30/03				
Carroll Tower	3/31/02			9/30/03				
Kilmartin Plaza	3/31/02			9/30/03				
Parenti Villa	3/31/02			9/30/03				
Dexter Manor II	3/31/02			9/30/03				
Scattered Sites	3/31/02			9/30/03				
Authority Wide	3/31/02			9/30/03				

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**Written Comments Submitted As Follow Up to the Public Meeting  
And PHA Response**

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Providence, Rhode Island 02903-2819

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March 30, 2001

BY FACSIMILE: 273-4623  
AND REGULAR MAIL

Mr. Steven J. O'Rourke  
Executive Director

Providence Housing Authority 100 Broad Street

Providence, RI 02903

Dear Mr. O'Rourke:

On behalf of the Hartford Park Tenants Association and Project BASIC, I am submitting written comments on the Providence Housing Authority's (PHA) Annual Plan for PY 2001. Also included are some follow up comments to last year's comments on the PHA's Admission and Occupancy Plan, and comments on the Providence Housing Authority's Section 9 Administrative Plan. You may recall that the Section 8 Administrative Plan had not been finalized by the time comments were due on last year's plan. As you did last year, could you send a written reply to these comments? Once again, we thank you for your staff's cooperation with requests for information.

I. Comments on the Annual Plan for FY 2001

The client groups have several general concerns as to the PHA's planned activities that have an effect on the supply of public and low income housing in Providence.

First, the client groups oppose demolishing the 32 units at Hartford Park proposed in the PHA Plan. There is a consent decree in effect that prevents the PHA from demolishing those units (*Durett v. Housing Authority of the City of Providence*). There is still a shortage of low income housing in Providence, and the PHA should not demolish more units.

The PHA's Annual Plan does not mention any proposed action to replace the scattered site units that have been sold (which number about 5 units according to your statements at the PHA Plan public hearing) or are planned to be sold (another 4 to 5 units), under the consent decree with Project BASIC in *Project BASIC v. Kemp*, the PHA was obligated to apply for replacement units that were sold. To Project BASIC's knowledge this was never done. Moreover, the PHA was supposed to apply for new units to replace units built within "areas of minority concentration" on Matthew Street and Suffolk Street (totaling 7 units). Again, this was apparently not done. The PHA must amend its plan to include development of all 17 or so units.

Our clients also have concerns relating to the redevelopment of the Roger Williams Homes site and surrounding area. Under the Consent Decree with Family Housing Development Corporation, at least 50 units of low-income housing are to be developed on the Roger Williams site. Our clients were quite disturbed to learn that the City of Providence is blocking the proposed redevelopment ("Problems with City. They would like the site used for other purposes, Currently negotiating." Providence Housing Authority Goals Management Plan at 5). Given the shortage of low income housing, our clients want the PHA to use the site only for the development of low income housing, and want the PHA to develop as many low income units on the Roger Williams site and surrounding area as possible. Moreover, before any more land on the Roger Williams site is dedicated for non-housing purposes, the City should first transfer replacement land to the PHA for the land now occupied by the B.J. Clanton School complex, and dedicate the replacement land for development of low income housing. Finally, any additional land at the Roger Williams site taken by the City for non-housing purposes must also be replaced with land dedicated for use as low income housing.

The PHA indicates it is working to redevelop the Lockwood Plaza Section 8 development as affordable housing. Our clients are concerned that because HUD is not providing any unit based subsidies to the PHA, the units may no longer be kept affordable to low and very low income households. Moreover, our clients are concerned that Lockwood Plaza tenants are not part of the PHA's redevelopment team. The PHA should look into using project-based Section 8 vouchers to keep the units affordable at

Lockwood Plaza, Also, our clients hope that the PHA will start to involve the tenants with planning the rehabilitation work at the development, and to develop a financing package that ensures that the development will continue to be affordable for low mid very low income tenants.

Besides issues relating to the supply of public and other low income housing, our clients have the following concerns.

Although the PHA has employed many present or recent public housing, residents, the PHA's Annual Plan still does not clearly spell out how the PRA and the PHA's, contractors will comply with Section 3 of the HUD Act of 1968. Section 3 requires that the employment and other economic opportunities generated by Federal financial assistance for housing and community development programs shall, to the greatest extent feasible, be directed toward low and very low income -persons, particularly those who are recipients of government assistance for housing. The PHA should develop a Section 3 compliance plan that establishes hiring goals for public housing residents in PHA staff positions, and requires contractors the P14A engages for construction and other PHA funded activities to establish hiring goals for public housing, residents. The Section 3 compliance plan should also address ways the PHA will assist public housing residents start businesses that the PHA would contract with in the future.

Our- clients support raising Section 8 voucher payment standards above current levels. Housing and utility costs have risen dramatically in the past year, while the FMR for the Providence area was out by 611/o. Our clients support an increase in the payment standard to 120% of the MVIR, and an even higher increase for apartments located on the East Side of Providence. This request is based largely on the accelerating costs of energy and housing. While the PHA has responded to this problem by raising utility allowances 25%, this action has the effect of reducing the rent payable to the landlord. Raising the utility allowance alone reduces the Section 8 voucher's value in the housing markets. This request is also supported by the PHA's latest rent reasonableness survey. According to that survey, the average rents found on the, East Side are more than 20% higher than the current voucher payment standard for 1 BR and 2 BR apartments. Our clients question the accuracy of the rent reasonableness survey for 3BR apartments and larger, since many 3 BR apartments on the East Side rent well above the upper limits found in the rent reasonableness survey (\$ 1,000 for 3SR, \$1,035 for 4BR, and \$1,170 for 5BR, respectively).

Our clients propose that the PHA no longer require tenants to -report changes in income between annual income reexaminations. The PHA has discretion to determine when tenants must report such changes and one of the options is "Never." See PHA Plan, Section 4(A)(1)(f) at page 25, The Newport Housing Authority has chosen the "Never option and we request that the PHA do the same. By making this change P14A site managers will have extra time to deal with such pressing problems, such as security, maintenance, and addressing tenants concerns. Moreover, such a move would foster economic self-sufficiency among residents. Tenants receive a greater incentive to find more gainful employment as they can keep more of their income, than they would otherwise -if their rent was increased as a result of an interim recertification.

Looking at the PHA Study of Fair Housing and Access to PHA Programs, it appears that several of the PHA's elderly/handicapped developments are identifiably white and others are identifiably non-white. Half of all of PHA's white residents of elderly housing live in two developments; Dominica Manor and Parenti Villa. By contrast, whites comprise less than 25% of the tenants at the Hartford Park high rise and Sunset Village. Not surprisingly, the latter two developments are part of or directly adjacent to Family public housing developments operated by the PHA. The PHA needs to examine its occupancy policies to determine the cause of the racial imbalance at these four developments.

A related civil rights concern is the PHA's compliance with Title VI of the Civil Rights Act of 1964 regarding applicants and tenants with limited English proficiency. Although the PHA has taken steps to insure non-English speaking applicants and tenants have access to PRA programs, there is still room for improvement. First, the PHA should translate key FRA documents into Spanish. Such documents include applications for assistance, notices of important decisions (such as denial of housing assistance, termination of tenancy, decisions of grievance panels, notice of rent arrearages, imposition of damage charges), PHA leases, and documents signed by a tenant in the Section 8 program. Second, the PHA should provide quality translation assistance at no cost to the applicant or tenant at all PHA site offices. This includes providing translators for informal meetings and grievance hearings. Third, the PHA's voice mail message recording should direct Spanish speaking callers to a Spanish menu, where Spanish speakers can either speak with or leave messages for Spanish speaking PHA personnel. Fourth, the PRA should post notices in Spanish that applicants and tenants have a right to-receive translation assistance from the PHA at no cost. Finally, the PHA should assess whether the recommendations we made should apply to any foreign languages other than Spanish.

Finally, our clients wish to go on the record to complain about the manager at Hartford Park. The manager often discusses tenants' business out in the open, in front of PHA personnel and other tenants. The manager also does not treat tenants respectfully, and is very quick to bring eviction cases that are not warranted, or involve sums of money under S I 00. The manager also has brought in law enforcement personnel to do inspections of apartments where the allegation is that the tenant is

housing a boarder or lodger (which, if true, is not a criminal offense). Our clients request a meeting with Senior PIH.A staff to discuss the problems with the manager at Hartford Park.

2. Follow Up Comments on the PHA's Admission and Continued Occupancy Policy

You responded to last years comments on the PHA's ACOP in a letter dated April 10, 2000. That letter suggested that the PHA would make certain revisions or clarifications to the ACOP. Our clients take note that most of the revisions promised by the PHA were made. However, some revisions were not made, or the concerns expressed were not responded to. Thus, some of last year's comments are repeated,

Grounds for Denial - Section 3.7

Last year, our clients recommended that the second through sixth bullets on page 3-7 should be eliminated based on the controlling federal regulations, which disfavor categorical exclusions that have no bearing on an individual's individual attributes. The PHA responded by agreeing to clarify those grounds for denial. Those Clarifications are found on page 3-7 and we offer the following comments.

Exclusion number 14 relating to applicants with household members who were ever evicted from public housing has been improved. however, the improved language contained in the second half of exclusion 14 was not carried into exclusion 15, relating to persons terminated fair cause under the certificate and voucher program. Our clients request the PHA to add that language in exclusion 15. Moreover, exclusion 15 should be more narrowly tailored, since there must always be cause to terminate anyone from the Section 8 program. For example, where an applicant is terminated from the voucher program because a family failed to secure timely lease approval, the family's action underlying the termination poses no detrimental threat to residents or the project environment. Our clients suggest adding the phrase at the end of exclusion 15, "where such cause would reasonably pose a detrimental threat to residents or the project environment."

The "lack of control or supervision of children" ground was supposed to be changed to include examples of what a reasonable person would believe to be lack of control or supervision of children. This was not done. Moreover, the ground should still indicate that where such lack of control or supervision was related to a disability of either the adult applicant or the children in the Household, that the ground for exclusion would not apply.

Adjusted Income-Section 6.6.5

The ACOF still allows the PHA to inquire about the nature of an applicant's disability for purposes of calculating the disability deduction. The nature of the disability is an irrelevant inquiry and not permissible for purposes of calculating the disability deduction. The only permissible inquiry is whether a tenant has a disability to qualify for any disability deduction.

Fraud-Section 6.11

This section should read "An applicant's intentional misrepresentation ... of any material information related to eligibility." An applicant may unintentionally provide inaccurate or false information and should not be penalized for doing so. An applicant should not be penalized for providing false but unimportant misinformation, such as the fact that the assent father of the child was never married to the applicant.

Special (interim) Reexaminations - Section 16.6

Out clients suggested above that the PHA de away with interim recertification when a tenant's income increases. A variant on that proposal is a suggestion made last year and not responded to regarding tenants with sporadic income, To assist the PHA in making recertifications of tenants with sporadic income, the PHA should take advantage of the authority in the new ACOP regulations to determine "annual income" for a period less than year, subject to the PHA's re-determination of income at the end of the shorter period. 24 CFF, 5.609(d).

Community Service Requirement - Chapter 17

The comments made last year regarding the Community Service Requirements are repeated again this year, as the PHA didn't make changes to conform with HUD's regulations. The PHA must make the following changes:

Under the ACOP regulations, the 8 hour service requirement can be a combination of Community Service (CS) and Economic Self-Sufficiency (ESS) activities. 24 CFR 960,603(a). The present ACOP requires that the 8 hours be one or the other. ACOP Section 17. 1.

Under the new ACOP regulations tenants may self-certify they are too disabled to perform community service and, thus, become exempt from the CS requirement. 24 CFR 960.601 (b). The present ACOP requires tenants to submit doctors' letters for medical or disability exemptions. ACOP Section 17.2.

Our clients also have comments about the way that the PHA implements the CS requirement. First, the PHA is reminded that the CS requirement "is not intended to be perceived as -punitive, but rather considered as rewarding activity that will assist residents in improving their own and their neighbors' economic and social well-being and give residents a greater stake in their communities." 65 Fed. Reg. 16709 (.March 29,2000). With this principal in mind, our clients make the following recommendations:

That the PHA define "work activity" as those activities accepted under the Rhode Island Family Independence Act, codified at RIGL Section 40-5.1-9(c)(Work requirements). These activities are broader than those set out in Section 407(4) of the Social Security Act.

Tenants receiving unemployment compensation should also be counted as engaged in a work activity, since as a condition of receiving benefits they must Certify they are looking for work.

Tenants should be given more than 5 days to report a change in their exempt status. Some working people may be unemployed for short periods of time, thus, it makes little sense to subject them to the CS requirement if they quickly become, re-employed.

a The PHA should consider a much broader range of activities as acceptable forms of CS, and should work closely with residents to develop CS positions. For example, the PHA should include staffing tenant association offices, teaching ESL,, tutoring children in literacy, math, etc., and providing after school care to working residents as acceptable CS activities.

#### Boarders and Lodgers - Section 22.2

If the PHA has a specific visitor policy,, our clients would like the opportunity to review and comment on it.

Our clients continue to maintain that the PHA may not enforce a lease provision regarding overnight guests who stay more than five consecutive nights. On pages 22-1through 22-3, section 22.2, of the ACOP the PHA addresses the issue of borders and lodgers. The PHA should not require a resident to provide copies of the driver's licenses, rent receipts, utility bills, subscriptions, or personal checks to the Housing Manager for each of their visitors who stay more than five days. According to federal regulations codified at 24 CFR 966.4, "[t]he tenant shall have the right to exclusive use and occupancy of the leased premises which shall include reasonable accommodation of the tenants' guests or visitors." In *McKenna v. Peekskill Housing Authority* 647 F. 2d 332(2<sup>d</sup> Cir. 19 8 1) the court examined a Housing Authority's policy which required the disclosure of the identities of a tenant's overnight guests to the management. The court, in referring to the PHA's registration requirement held that the requirement that the Authority, ". . . know that person's name in no way served the interest of having only eligible tenants." *Id.* at 335. It further stated that the, ". . . registration of guests did not promote the health and sanitary conditions of the project," *Id.* at 335. The court maintained that the Authority, ". . . could by less intrusive means have required tenants to, show that only proper individuals were living in the apartments and to explain theextendedpresenocofnon-tenants." *Id.* at 335. See also *L. Cory. Lebanon You sinx. 4uthori* 760 F., 2d 361 (1\$' Cir. 1 985).

#### Housekeeping -- Section 22.3

On page 22-3, section 22.3, of the ACOP the PHA addresses the issue of housekeeping and also the maintenance of common areas. Under state law, the landlord Is responsible for common area maintenance, not the tenant. RIGL 34-18-22(a)(3). This is true of areas such as hallways shared by four families.

Our clients would like the opportunity to review and comment on the PHA's Housekeeping Compliance Agreement.

### 3. Comments on FRA Lease

Our clients have several concerns regarding the lease that is included with the ACOP, and request that revisions, be made to the lease. Some comments are similar to last year's and other comments address changes to the lease that the PHA proposed since last year.

#### Overnight Guests (Section J(I))

Our clients continue to object to the provision that requires tenants to get written approval from the PH.A before having guests that stay more than five days. There arc far less invasive means for the PHA to insure that tenants do not permit board= and lodgers to reside in their apartments. Courts have declared similar lease provisions unconstitutional, and we believe this provision will not survive a legal challenge. See *Lancor v. Lebanon Housing Authority*, 760 F.2d 361 (1" Cir. 1985); *McKenna v. Peetskill Housing Authority*, 647 F. 2d 332 (2 d Cir. I 98 1). We urge that this provision be deleted, and that the PHA naive to evict persons household.% who violate the lease provision regarding boarders and lodgers,

## Live In Aides (Section J(2))

The lease states that live in aides will be treated as a guest of a tenant and will be subject to the rules regarding guests. Under federal law, live in aides are not guests, but residents. 24 CFR 966.4(d)(3). Thus, live-in aides should be subject to the rules regarding residents, subject to any limitations imposed on live in aides by federal law. Your response to this comment last year stated that the PHA would study this issue, however, no change to the lease was made.

## Snow Removal (Section L(g))

The lease requires tenants to keep sidewalks and parking areas clear of snow and ice. Under state law, a landlord is required to keep all common areas of the premises in a clean and safe Condition." RIGL 34-18-22(a)(3). There are few walk-ways or

parking areas designated exclusively for a particular tenant's use, other than at some of the scattered site units. This portion of the lease should only be enforceable against those tenants. Our clients propose that Section (L)(8) be deleted and Section (L)(29) retained.

## Notice of Extended Absence (Section L(21.))

Our clients continue to object to this provision because of security concerns involving PHA maintenance and management staff. A tenant might as well put up a sign saying they are not around. The PHA has a remedy under the landlord-tenant act to recover apartments it believes have been abandoned. There is no reason that the PHA needs to know that a tenant has taken a vacation or some other kind of trip that requires them to be absent from their apartments for an extended period of time.

## Conduct and Criminal Activity (Section L(27)(d))

Without a prior opportunity for comment, the PHA added now language to the lease that speaks to the PHA's receiving criminal conviction records, It is not clear what the consequences to a tenant are when the PHA receives such information. This provision follows language in paragraph 27 that informs a tenant what activities a tenant shall not engage in, The PHA's receipt of records is not an activity that a tenant engages in. This provision should be deleted.

## Imposition of "Reconditioning Costs" (Section P(2))

Our clients continue to object to the provision that requires tenants who vacate within a year to pay "reconditioning costs." Under state law, a tenant is only responsible for costs for repairing damage beyond ordinary wear and tear, regardless of when they move out.

## Termination for Drug Related and other serious criminal activities (Section P(6))

The language in this section is much broader than that which is legally permissible. First, a tenant has a right to cure lease violations involving certain drug crimes (especially simple possession of drugs) regardless of where the drug activity occurred. The same is true for "serious criminal activity:" only those crimes listed in R.I.G.L. 34-18-24(10) are grounds for evicting a tenant without first offering them a right to cure. Second, the PHA may not terminate any tenant's lease for the actions of a household member, guest, or other person under the tenant's control without a showing of particularized leaseholder fault, Rucker v. Davis, 237 F.3d 11 13 (9th Cir. 2001). In a guidance issued by HUD implementing the Puck decision, HUD set forth standards barring lease terminations for drug activity:

- (a) outside the leaseholder's unit, absent PHA proof that the leaseholder failed to take "reasonable steps to prevent drug activity from occurring" in circumstances in which the leaseholder "know or should have known of the criminal activity" and could "realistically exercise control over the conduct of [the] household member or guest"; and
- (b) inside the leaseholder's unit, if the leaseholder introduces evidence sufficient to overcome the legal "presumption" that because the unit is an area over which the leaseholder has control and with respect to which the leaseholder can grant or deny access, the leaseholder must have failed to take all requisite steps to prevent criminal activity from occurring there.

HUD NOTTCF, PIH 2001-8 (HA) (March 13, 2001)

The PHA should revise this part of the lease to conform both with the requirements of state law, and the Rucker decision.

## Termination of Lease for Failure to Comply with Community Service Requirement (Section P(6)(d))



The PHA cannot terminate the lease for a tenant's failure to comply with the community service requirement. The PHA can refuse to renew a tenant's lease at the end of the initial term if one, member of tenant's household subject to the community service requirement fails to comply. This provision must be deleted and a new section added to the lease that conforms to the PHA's community service requirement, including language about having a right to cure the non-compliance with the community service requirement.

Termination of Lease for Fleeing to Avoid Prosecution, etc. (Section P(6)(o))

The PHA added this new section to the lease without any opportunity for public comment. Our clients object to this provision for several reasons. First, neither federal nor state law authorizes the PHA to adopt the provision. Second, the provision is vague and overbroad in that it does not inform the tenant what conduct is proscribed. Nor is it clear that innocent household members would be subject to eviction for the actions of a household member on the run (and presumably not living in public housing). If a tenant has been convicted of a felony, the tenant is subject to eviction under federal law only where good cause exists, and under state law only for a non-curable criminal offense set forth in R.T.G.L. §34-18-24("§- 1 0).

## 2. Comments on Section 9 Administrative Plan

Our clients' concerns regarding the PHA's Section 8 Administrative Plan("SSAP") relate primarily to denials of admission of applicants and termination of participants.

### Section 2,.Part. V

This part of the PHA -plan fails to include language relating to mitigating circumstances. Our clients are concerned that if an applicant falls into any one of the laundry list of reasons that the PHA includes for denying assistance to applicants, that PHA will deny assistance, no matter how long ago the conduct occurred and without regard to mitigating circumstances. Thus, the S8AP must have a provision that indicates the PRA will consider mitigating factors as to any adverse information received by PHA. Our clients propose the following language, taken directly from 24 CFR § 982.552(c)(2)-

PHA discretion to consider circumstances

In determining whether to deny admission or terminate assistance because of action or failure to act by members of the family:

(i) The PHA has discretion to consider all of the circumstances in each case, including the seriousness of the case, the extent of Participation or culpability of individual family members, mitigating circumstances related to the disability of a family member, and the effects of denial or termination of assistance on other family members who were not involved in the action or failure.

(ii) The PHA may impose, as a condition of continued assistance for other family members, a requirement that other family members who participated in or were culpable for the action or failure will not reside in the unit. The PHA may permit the other members of a participant family to continue receiving assistance.

(iii) If the family includes a person with disabilities, the, PHA decision concerning such action is subject to consideration of reasonable accommodation in accordance with part 8 of 24 CFR.

Our Clients are also concerned that the categories for denying assistance are broader than what is permissible under HLID regulations. The S8A.P states that assistance would be denied if any family member has done something that falls within the 8categories for denying assistance. However, HLTLD regulations speak only to the family as a whole, as opposed to a family member regarding owing amounts IID a public housing authority or failing to reimburse a housing authority for amounts owed. 24 CFR §

Thus, the provisions of SSA.P at Section 2,Part V, paragraphs EF must be modified to include only "the family" instead of "family member."

The S8AP also calls for denying assistance to applicants who ever were evicted from public Housing. HTJD regulations only authorize denying assistance to applicants "[i]f any member of the family has been evicted from federally assisted housing in the last five years. . . .". 24 CPR § 982.552(c)(1)(ii). S8AP Section 2, Part V, paragraph A must be changed to: "Has been evicted from public housing within the past 5 years."

Regarding denials of assistance for applicants that have committed drug related crimes such as illegal use or possession for personal use of a controlled substance, the PHA can only deny such applicants where "such use or possession [has] occurred within one year before the date that the PHA provides notice to the family of the PHA's determination to deny or terminate

assistance." 24 CFR § 982-553(b). Moreover, the same HUD regulation contains an additional restriction on denying applicants who engaged in possession or use of illegal drugs:

The PHA may not deny or terminate assistance for such use or possession by a family member, if the family member can demonstrate that he or she:

- (1) Has an addiction to a controlled substance, has a -record of such an impairment, or is regarded as having such an impairment; and
- (2) Is recovering, or has recovered from, such addiction and does not currently use or possess controlled substances. The PHA may require a family member who has engaged in the illegal use of drugs to submit evidence of participation in, or successful completion of, a treatment program as a condition to being allowed to reside in the unit.

Thus, S8AP Section 2, Part V paragraph C needs substantial rewriting to conform to HUD regulations.

Section 3, Part 1, Paragraph B - Exclusions from Annual Income

The first exclusion from annual income is not as broad " that stated at 24 CFP,§5.609(c)(9). Our clients propose that subparagraph (1) of this section be changed as follows:

Temporary, nonrecurring or sporadic income (including gifts).

Section 3, Part V - Utility Allowances

Given the rapid increases in utility costs that have occurred in the past two years, our clients propose that utility allowances be reviewed every six months instead of annually.

Section 4, Part X, Paragraph C - Term of Voucher

Our clients propose a language, change in subparagraphs (e) and (f), inserting the following words after the words "an additional extension:"

for a term reasonably required to accommodate the disability

This language tracks the applicable HUD regulation, 24 CFR § 982.303(b)(2).

Section 9, Part It - Procedure for Moves

Our clients note that the rental -market has tightened considerably, and more and more landlords are refusing to rent to tenants that have Section 8 vouchers. To prevent current voucher holders from losing their Section 8, our clients propose the following measures for a tenant: 1.) who receives a termination of tenancy notice from the landlord or, 2.) whose landlord's HAP is terminated by the PHA for any action or inaction by the landlord (such as the landlord's non-compliance" with HQS or landlord fraud). Our clients request that The PRA delay issuance of a new voucher until either 1.) the tenant locates an apartment and is prepared to submit a request for lease approval; or 2.) when the tenant is ordered evicted by a court. In lieu of a new voucher, the tenant should be given a letter from the PHA to show prospective landlords that they will be issued a new voucher once the tenant locates an apartment. ]3y delaying issuance of the new voucher, a tenant will have more time to find a -new apartment. Many Section 8 voucher holders cannot find an apartment even within 120 days, so the later the issuance date, the more time a tenant has to find an apartment. Moreover such a change wil.l reduce the risk that current participants lose their Section 8 because their new voucher expires. In addition, the policy concerning voucher expiration for moving tenants should be changed from 60days to 120 days. S8AP Section 3, Part U, paragraph A.

Section 11, Part ITT - PFIA Termination of the HAP Contract With The Owner

This part of the S8AP should contain language that includes situations where the PHA decides to suspend HAP payments for the owner's failure to comply with Housing Quality Standards. The provision should state that when a HAP payment is suspended, the owner shall receive a notice of payment suspension. That notice shall state the HAP payment has been suspended, the reason why the HAP payment was suspended, and shall inform the owner that the owner cannot terminate the tenant's tenancy or evict the tenant for non-payment of rent for the Housing Authority's failure to make the HAP payment.

Section II, Part IV - PHA Denial of Continued Assistance to the Family

The S8AP states that if any "family member" violates a family obligation under the Section 8 program, the PHA can deny assistance to the family. However, the family obligations do not pertain to individuals, but to the family as a whole. For example, if one family member does not disclose a social security number and another family member does, the "family" is in compliance with the family obligations even if one member of the family is not. Our clients suggest that the items for which the family is responsible for be grouped under one heading (i.e., the first 17 items in paragraph A, and the items in paragraphs F and G). AU the other items in this part should be grouped

under a second heading for which family members are responsible for following. The headings would read as follows:

A. The PHA may at any time deny continued assistance if the family:

B. The PHA may at any time deny continued assistance- if any family member: The grounds for denying continued assistance for having been evicted from public

housing (paragraph 8) and committing drug offenses (paragraph D) needs to be changed in the same way discussed on page I I as grounds for denying applicants. The standards for denying continued assistance based upon these two grounds are the same as those for denying appliran6, 24 CFR 982.552(c)(ii) and 982.553(b).

In making any decision to deny continued assistance, the PHA must also consider mitigating circumstances. The language proposed on page 10-1 I regarding applicants should be carried over into this part of the S8AP.

RESPECTFULLY SUBMITTED:

HARTFORD PARK TENANTS ASSOCTATION & PROJECT BASIC By Their Attorney,.

Cc.- Providence and Boston HUD Offices

Prov HA Plan Comments 2001



**Providence Housing Authority Response:****PROVIDENCE HOUSING AUTHORITY  
100 BROAD STREET  
PROVIDENCE, R.I. 02903-4129**

THOMAS J. ANTON  
CHAIRMAN

STEVEN J. O'ROURKE  
EXECUTIVE DIRECTOR

DOMENIC V. SCHIANO  
DEPUTY DIRECTOR

April 16, 2001

Attorney Steven Fischbach  
R. I. Legal Services  
56 Pine Street – 4<sup>th</sup> Floor  
Providence, RI 02903-2819

**SUBJECT: Response to Comments FY 2001 Annual Plan**

Dear Mr. Fischback:

Thank you for your comments concerning the Providence Housing Authority's FY 2001 Annual Plan. I appreciate the significant amount of time you dedicated to responding to the many issues and/or policies cited in the plan. I have addressed your concerns in the order they are addressed in your letter.

**Demolition of 32 Units at Hartford Park**

You state you object to the demolition of the 32-units cited in the plan. We are very much aware of the Consent Decree, which prohibited any additional demolition of units at Hartford Park. However, the consent decree does allow for amendments when circumstances require. We believe, in this case, it is an appropriate modification. Units constructed on the former sites of the demolished high-rise buildings replaced the buildings in question. In fact, there was a net increase in the number of bedrooms after the new construction. The existing buildings have been unoccupied for more than ten years and would be costly to rehabilitate. In their current condition they are a safety hazard. The Barry Road area has a shortage of parking spaces. The Consent Decree also required each unit to have a parking space. Even with the most creative of architectural teams we were unable to provide enough parking spaces without demolishing the four uninhabitable buildings. One of your predecessors was a party to the planning of the modernization of the development. He, like us, heard the residents strongly state that they wanted parking as close as possible to their unit and did not favor traveling a distance to a parking area. Many residents in the Barry Road area have called for the demolition of the units for additional parking. Once the units are demolished, we will create additional parking and a passive recreation area. The buildings are a serious blight and a safety hazard to that section of the development that underwent a multi-million dollar renovation.

**Replacement Units for Scattered Sites Sold Under the Home Ownership Program**

The units you cite were replaced with an allocation of Section 8 certificates. While you wanted new construction, the Agreement allowed the use of Section 8 vouchers as replacement units. The PHA, however, would like to replace those units with new construction as well. However, for the last several

years there has not been a development program or funds allocated by the Congress, nor asked for by the Administration. We are currently awaiting word on a new production program that the Congress has been considering. If it materializes, we intend to apply for funds to construct new units.

**Roger Williams Development**

We, too, have concerns about the creation of affordable housing at the Roger Williams site. Our partners, Family Housing Development Corporation, and we are attempting to reach an agreement with the city concerning a portion of the site the School Department is seeking to build a new high school. The negotiation involves the tradeoff of contiguous properties. Negotiations have been going well and we fully plan to construct at least the minimum of 50 affordable housing units on the site.

**Lockwood Plaza**

The PHA is not now the owner of the Lockwood Plaza development and believe it inappropriate to comment at this time. Please be assured that if the development is acquired, we will involve the residents as we have at our public housing sites, including establishing a modernization committee of residents.

**Section 3 of the Housing and Community Development Act**

As you mentioned, the PHA has a very active resident hiring program. At last count, approximately 22% of our full-time staff are or were public housing residents. Our part-time staff is overwhelmingly comprised of residents who use the employment opportunity to gain valuable experience.

The hiring of residents for positions with contractors performing rehabilitation work at the PHA has proven more problematic. While a number of residents have been hired, most of the positions have been for cleaning up spaces after work has been done. At one time we maintained a log of residents who wanted to work for contractors. However, most of our rehabilitation work is now smaller in scale and requires mostly skilled tradespeople. When opportunities arise, we arrange for residents to work.

**Section 8 Voucher Payment Standards**

We agree that, due to market conditions, we need to increase the voucher payment standard. Where our surveys indicate an increase in rental costs, we apply to HUD for exceptions. We recently requested an exception to the voucher payment standard for the Eastside of the city and are awaiting HUD's determination.

**Changes in Income**

The PHA will not agree to use "never" as a standard for reporting income changes. We do not believe it is a disincentive to seek employment, since there are currently adequate programs that serve as incentives for residents to seek employment without jeopardizing their income or additional income.

**Non-English Speaking Applicants and Residents**

You state that we should offer more information in the Spanish language to accommodate our non-English speaking residents and applicants. Currently many of our materials are in English and Spanish. Solicitations for our training and education programs are bilingual, as are our newsletters, applications for assistance, etc. We will, however, review all existing materials to determine if improvements can be made. You should know that we now make a conscientious effort to hire bilingual staff for our many programs and staff positions. At the same time we offer English language classes for our Spanish-speaking residents in order to assist them in assimilating into the American culture and way of life.

**Manager at Hartford Park**

You charge the manager of the Hartford Park with several irregularities. I request that you meet with your clients and put their charges in writing. Once I receive and conduct a preliminary review, I will personally meet with the residents. If RI Legal Services can facilitate this, I would appreciate it.

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### Comments on the PHA's Admission and Continued Occupancy Policy

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#### Grounds for Denial-Section 3.7

**Comment:** *Last year, our clients recommended that the second through sixth bullets on page 3-7 should be eliminated based on the controlling federal regulations, which disfavor categorical exclusions that have no bearing on an individual's individual attributes. The PHA responded by agreeing to clarify those grounds for denial. Those clarifications are found on page 3-7 and we offer the following comments.*

*Exclusion number 14 relating to applicants with household members who were ever evicted from public housing has been improved. However, the improved language contained in the second half of exclusion 14 was not carried into exclusion 15, relating to persons terminated for cause under the certificate and voucher program. Our clients request the PHA add that language in exclusion 15. Moreover, exclusion 15 should be more narrowly tailored, since there must always be cause to terminate anyone from the Section 8 program. For example, where an applicant is terminated from the voucher program because a family failed to secure timely lease approval, the family's action underlying the termination poses no detrimental threat to residents or the project environment. Our clients suggest adding the phrase at the end of exclusion 15, "Where such cause would reasonably pose a detrimental threat to residents or the project environment."*

**Response:** We agree. The following language will be added to bullet 15 on page 3-7 of the ACOP; "Where such cause would reasonably pose a detrimental threat to residents or the project environment."

**Comment:** *The "lack of control or supervision of children" ground was supposed to be changed to include examples of what a reasonable person would believe to be lack of control or supervision of children. This was not done. Moreover, the grounds should still indicate that where such lack of control or supervision was related to a disability of either the adult applicant or the children in the household, that the ground for exclusion would not apply.*

**Response:** We agree to add examples of "lack of supervision of children" to bullet 17 on page 3-7 of the ACOP such as; evidence of destruction of property and complaints from neighbors regarding noise and children's behavior. However, we still believe that there are enough safeguards in place to accommodate problems experienced by a disabled resident with children.

#### Adjusted Income-Section 6.6.5

**Comment:** *The ACOP still allows the PHA to inquire about the nature of an applicant's disability for purposes of calculating the disability deduction. The nature of the disability is an irrelevant inquiry and not permissible for purposes of calculating the disability deduction. The only permissible inquiry is whether a tenant has a disability to qualify for any disability deduction.*

**Response:** We disagree. We do not inquire about the nature of an applicant's disability for purposes of calculating the disability deduction. The Handicap/Disability Verification form that is used to determine whether an applicant qualifies for a disability deduction asks if the applicant is or is not handicapped. No further information is required.

#### Fraud-Section 6.11

**Comment:** *This section should read "An applicant's intentional misrepresentation...of any material information related to eligibility." An applicant may unintentionally provide inaccurate or false information*

and should not be penalized for doing so. An applicant should not be penalized for providing false but unimportant misinformation, such as the fact that the absent father of the child was never married to the applicant.

**Response:** We disagree. It is not the PHA's responsibility to prove intent. Applicants are cautioned to provide accurate information on their applications for admission and for continued occupancy. Section 6.11 states that "misrepresentation...will be *considered* grounds for denial." Considered does not mean denied. We review each case thoroughly before making a favorable or unfavorable determination.

### **Special (interim) Reexaminations-Section 16.6**

**Comment:** Our clients suggested above that the PHA do away with interim re-certification when a tenant's income increases. A variant on that proposal is a suggestion made last year and not responded to regarding tenants with sporadic income. To assist the PHA in making re-certifications of tenants with sporadic income, the PHA should take advantage of the authority in the new ACOP regulations to determine "annual income" for a period less than year, subject to the PHA's re-determination of income at the end of the shorter period. 24 CFR 5.609(d)

**Response:** We disagree. We currently follow federal regulations to determine sporadic income. Our re-certification process outlines procedures for annual and interim re-certifications. Our policy lists all income exclusions and inclusions required by HUD.

### **Community Service Requirement-Chapter 17**

**Comment:** The comments made last year regarding the Community Service requirement are repeated again this year, as the PHA didn't make changes to conform to HUD's regulations. The PHA must make the following changes:

- Under the ACOP regulations, the 8-hour service requirement can be a combination of Community Service (CS) and Economic Self Sufficiency (ESS) activities. 24 CFR 960.603(a). The present ACOP requires that the 8 hours be one or the other. ACOP Section 17.1
- Under the new ACOP regulations tenants may self-certify they are too disabled to perform community service and, thus, become exempt from the CS requirement. 24 CFR 960.601(b). The present ACOP requires tenants to submit doctors' letters for medical or disability exemptions. ACOP Section 17.2.

**Response:** We agree. We will include in our Community Service Policy that Economic Self Sufficiency and Community Service can be used in combination to fulfill the 8-hour community service requirement. The PHA will also add that tenants may self-certify themselves as exempt due to a disability. The PHA will review each case to determine if we will allow the exemption and that the family is in compliance with the Community Service Rule.

**Comment:** Our clients also have comments about the way that the PHA implements the CS requirement. First, the PHA is reminded that the CS requirement "is not intended to be perceived as punitive, but, rather considered as rewarding activity that will assist residents in improving their own and their neighbors' economic and social well-being and give residents a greater stake in their communities." 65 Fed. Reg. 16709 (March 29, 2000). With this principal in mind, our clients make the following recommendations:

- That the PHA define "work activity" as those activities accepted under the Rhode Island Family Independence Act, codified at RIGL Section 40-5.1-9 (c) (Work requirements). These activities are broader than those set out in Section 407(d) of the Social Security Act.



- *Tenants receiving unemployment compensation should also be counted as engaged in a work activity, since as a condition of receiving benefits they must certify they are looking for work.*
- *Tenants should be given more than 5 days to report a change in their exempt status. Some working people maybe unemployed for short periods of time; thus, it makes little sense to subject them to the CS requirement if they quickly become re-employed.*
- *The PHA should consider a much broader range of activities as acceptable forms of CS, and should work closely with residents to develop CS positions. For example, the PHA should include staffing tenant association offices, teaching ESL, tutoring children in literacy, math, etc., and providing after school care to working residents as acceptable CS activities.*

**Response:** We agree and will include in our definition *work activity* as defined under the RI Family Independence Act. We disagree that job search is equal to being engaged in a work activity and believe that 5 days is a reasonable amount of time to report any change in status to management. The PHA does consider a broad range of activities of acceptable forms of community service.

### **Boarders and Lodgers-Section 22.2**

**Comment:** *If the PHA has a specific visitor policy, our clients would like the opportunity to review and comment on it.*

*Our clients continue to maintain that the PHA may not enforce a lease provision regarding overnight guests who stay more than five consecutive nights. On pages 22-1 through 22-3, section 22.2, of the ACOP the PHA addresses the issue of boarders and lodgers. The PHA should not require a resident to provide copies of the driver's licenses, rent receipts, utility bills, subscriptions, or personal checks to the Housing Manager for each of their visitors who stay more than five days. According to federal regulations codified at 24 CFR 966.4, "[t]he tenant shall have the right to exclusive use and occupancy of the leased premises which shall include reasonable accommodation of the tenants' guests or visitors." In McKenna v. Peekskill Housing Authority, 647 F.2d 332 (2<sup>nd</sup> Cir. 1981) the court examined a Housing Authority's policy which required the disclosure of the identities of a tenant's overnight guests to the management. The court, in referring to the PHA's registration requirement held that the requirement that the Authority, "... know that person's name in no way served the interest of having only eligible tenants." *Id.* at 335. It further stated that the, "...registration of guests did not promote the health and sanitary conditions of the project." *Id.* at 335. The court maintained that the Authority, "...could by less intrusive means have required tenants to show that only proper individuals were living in the apartments and to explain the extended presence of non-tenants." *Id.* at 335. See also Lancor v. Lebanon Housing Authority, 760 F.2d 361 (1<sup>st</sup> Cir. 1985).*

**Response:** The ACOP is available for all residents to review. Every management office has a copy. PHA does not require evidence that visitors or guests reside elsewhere unless the tenant is curing a notice of non-compliance.

### **Housekeeping—Section 22.3**

**Comment:** *On page 22-3, section 22.3, of the ACOP the PHA addresses the issue of housekeeping and also the maintenance of common areas. Under state law, the landlord is responsible for common area maintenance, not the tenant. RIGL 34-18-22 (a)(3). This is true of areas such as hallways shared by four families.*

*Our clients would like the opportunity to review and comment on the PHA's Housekeeping Compliance Agreement.*

**Response:** RIGL 34-18-22 (c) states that a landlord can require some maintenance from tenants as long as both parties agree to it in writing. Our residents agree to this when they sign their lease. The

PHA's Housekeeping Compliance Agreement is available in all management offices for tenant's review and comments.

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### Comments on PHA Lease

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**Comment:** *Our clients have several concerns regarding the lease that is included with the ACOP, and request that revisions be made to the lease. Some comments are similar to last year's and other comments address changes to the lease that the PHA proposed since last year.*

#### Overnight Guests (Section J(1))

**Comment:** *Our clients continue to object to the provision that requires tenants to get written approval from the PHA before having guests that stay more than five days. There are far less invasive means for the PHA to insure that tenants do not permit boarders and lodgers to reside in their apartments. Courts have declared similar lease provisions unconstitutional, and we believe this provision will not survive a legal challenge. See Lanvor v. Lebanon Housing Authority, 760 F.2d 361 (1<sup>st</sup> Cir. 1985); McKenna v. Peekskill Housing Authority, 647 F. 2d 332 (2<sup>nd</sup> Cir. 1981). We urge that this provision be deleted, and that the PHA move to evict persons households who violate the lease provision regarding boarders and lodgers.*

**Response:** We disagree. We believe 5 days is a reasonable amount of time for an overnight guest. What "far less invasive means" do you suggest? We have a responsibility to determine who is living in our developments. Overcrowding can cause unsafe conditions and contribute to violations of city code and drive up the costs for the delivery of services. Under the re-certification process we require families to disclose who is living in the unit so that we can properly determine the number of bedrooms needed and calculate rent. HUD requires management to certify that they have properly reflected the accurate number of people in the unit and counted all applicable income.

#### Live In Aides (Section J(2))

**Comment:** *The lease states that live in aides will be treated as a guest of a tenant and will be subject to the rules regarding guests. Under federal law, live in aide's are not guests, but residents. 24 CFR 966.4 (d)(3). Thus, line-in aides should be subject to the rules regarding residents, subject to any limitations imposed on live in aides by federal law. Your response to this comment last year stated that the PHA would study this issue. However, no change to the lease was made.*

**Response:** We agree to change the language to reflect that live-in aides will be treated as residents and subject to the rules regarding residents, subject to any limitations imposed on live-in aides by federal law.

#### Snow Removal (Section L(8))

**Comments:** *The lease requires tenants to keep sidewalks and parking areas clear of snow and ice. Under state law, a landlord is required to "[k]eep all common areas of the premises in a clean and safe condition." RIGL 34-18-22 (a)(3). There are few walkways or parking areas designated exclusively for a particular tenant's use, other than at some of the scattered site units. This portion of the lease should only be enforceable against those tenants. Our clients propose that Section (L)(8) be deleted and Section (L)(29) retained.*

**Response:** We disagree. RIGL 34-18-22 (c) states that a landlord can require some maintenance from tenants as long as both parties agree to it in writing. Our residents agree to this when they sign their lease. Section (L) (8) clearly states ...areas assigned for the Tenant's *exclusive* use.

#### Notice of Extended Absence (Section L(21))

**Comment:** Our clients continue to object to this provision because of security concerns involving PHA maintenance and management staff. A tenant might as well put up a sign saying they are not around. The PHA has a remedy under the landlord-tenant act to recover apartments it believes have been abandoned. There is no reason that the PHA needs to know that a tenant has taken a vacation or some other kind of trip that requires them to be absent from their apartments for an extended period of time.

**Response:** We disagree. Management and maintenance staff is not a security risk. We are charged with a responsibility to maintain our developments and this includes knowing who is living in our apartments. If we know that a family is not in a unit, it will reduce the possibility of us sending non-compliance notices which will be unanswered. We require this information because we receive reports from other residents stating that families have boarders and lodgers. If we have the appropriate information, no further action is necessary on management's part. We cannot consider a unit abandoned unless the family has substantially removed all the furniture from the unit and the rent has not been paid.

### Conduct and Criminal Activity (Section L(27)(d))

**Comment:** Without prior opportunity for comment, the PHA added new language to the lease that speaks to the PHA's receiving criminal conviction records. It is not clear what the consequences to a tenant are when the PHA receives such information. This provision follows language in paragraph 27 that informs a tenant what activities a tenant shall not engage in. The PHA's receipt of records is not an activity that a tenant engages in. This provision should be deleted.

**Response:** We agree. Section L (27)(d) should be included in Section L (27)(a). We further agree to change the language to state, *The PHA...for adult applicants and adult additions to lease*. The PHA does need a criminal conviction record to proceed with an eviction action against a current tenant.

### Imposition of "Reconditioning Costs" (Section P(2))

**Comments:** Our clients continue to object to the provision that requires tenants who vacate within a year to pay "reconditioning costs." Under state law, a tenant is only responsible for costs for repairing damage beyond ordinary wear and tear, regardless of when they move out.

**Response:** We agree to a change. Section P (2) will read as follows: "If the tenant vacates the apartment during the first year of occupancy, the Tenant will be responsible for all rent for 60 days after vacating or until the apartment is re-rented, whichever is less. The Tenant will also be responsible for reconditioning costs, including cleaning and painting to the extent allowed by law."

### Termination for Drug Related and other serious criminal activities (Section P(6))

**Comment:** The language in this section is much broader than that which is legally permissible. First, a tenant has a right to cure lease violations involving certain drug crimes (especially simple possession of drugs) regardless of where the drug activity occurred. The same is true for "serious criminal activity." Only those crimes listed in R.I.G.L. 34-18-24(10) are grounds for evicting a tenant without first offering them a right to cure. Second, the PHA may not terminate any tenant's lease for the actions of a household member, guest, or other person under the tenant's control without a showing of particularized leaseholder fault, *Rucker v. Davis*, 237 F.3d 1113 (9<sup>th</sup> Cir. 2001). In a guidance issued by HUD implementing the *Rucker* decision, HUD set forth standards barring lease terminations for drug activity:

- (a) Outside the leaseholder's unit, absent PHA proof that the leaseholder failed to take "reasonable steps to prevent drug activity from occurring" in circumstances in which the leaseholder "knew or should have known of the criminal activity" and could "realistically exercise control over the conduct of [the] household member or guest"; and

(b) *Inside the leaseholder's unit, if the leaseholder introduces evidence sufficient to overcome the legal "presumption" that because the unit is an area over which the leaseholder has control and with respect to which the leaseholder can grant or deny access, the leaseholder must have failed to take all requisite steps to prevent criminal activity from occurring there.*

**Response:** The PHA will make the following change in Section P (6) after the semi colon: ". . .such activity may cause for termination of the lease to the extent allowed by law."

#### **HUD NOTICE PIH 2001-8 (HA) (March 13, 2001)**

**Comment:** *The PHA should revise this part of the lease to conform both with the requirements of state law, and the Rucker decision.*

**Response:** The PHA is in the process of modifying the lease to comply with the new standard.

#### Termination of Lease for Failure to Comply with Community Service Requirement (Section P(6)(d))

**Comment:** *The PHA cannot terminate the lease for a tenant's failure to comply with the community service requirement. The PHA can refuse to renew a tenant's lease at the end of the initial term if one member of tenant's household subject to the community service requirement fails to comply. This provision must be deleted and a new section added to the lease that conforms to the PHA's community service requirement, including language about having a right to cure the non-compliance with the community service requirement.*

**Response:** We agree. We will remove the Community Service Requirement from section P (termination) of our lease. A non-renewal clause for failure to comply with Community Service Rule Requirements will be added to the lease. Failure to comply will result in non-renewal of the lease and eviction action to the extent allowed by law.

#### Termination of Lease for Fleeing to Avoid Prosecution, etc. (Section P(6)(o))

**Comment:** *The PHA added this new section to the lease without any opportunity for public comment. Our clients object to this provision for several reasons. First, neither federal nor state law authorizes the PHA to adopt the provision. Second, the provision is vague and overbroad in that it does not inform the tenant what conduct is proscribed. Nor is it clear that innocent household members would be subject to eviction for the actions of a household member on the run (and presumably not living in public housing). If a tenant has been convicted of a felony, the tenant is subject to eviction under federal law only where good cause exists, and under state law only for a non-curable criminal offense set forth in R.I.G.L. §34-18-24(8-10).*

**Response:** The Quality Housing And Work Responsibility Act of 1998 requires Housing Authorities to include in their leases the following clause under grounds for termination of tenancy: "*Fleeing to avoid prosecution, or custody or confinement after conviction, for a felony.*" We will change this section to read as follows: "*Fleeing to avoid prosecution, custody, or confinement after conviction of a felony to the extent allowed by law.*"

### **Comments on Section 8 Administrative Plan**

Upon reviewing your comments about the Section 8 Administrative Plan, we find that most are changes in language which will reflect the regulations verbatim. In practice, these are the rules we follow. The changes to the following sections can be made as outlined:

**Section 2, Part V – Discretion to consider mitigating circumstances** – Add the following:

In determining whether to deny admission or terminate assistance because of action or failure to act by members of the family:

- (i) The PHA has discretion to consider all of the circumstances in each case, including the seriousness of the case, the extent of participation or culpability of individual family members, mitigating circumstances related to the disability of a family member, and the effects of denial or termination of assistance on other family members who were not involved in the action or failure.
- (ii) The PHA may impose, as a condition of continued assistance for other family members, a requirement that other family members who participated in or were culpable for the action or failure will not reside in the unit. The PHA may permit the other members of a participant family to continue receiving assistance.

**Section 2 Part V**, paragraph A – Add the following:

- A. Has been evicted from public housing within the past five (5) years.

**Section 2, Part V paragraph C** – recovering from an addiction – Add the following:

The PHA may not deny or terminate assistance for such use or possession by a family member, if the family member can demonstrate that he or she:

- (1) Has an addiction to a controlled substance, has a record of such an impairment, or is regarded as having such an impairment; and
- (2) Is recovering, or has recovered from, such addiction and does not currently use or possess controlled substances. The PHA may require a family member who has engaged in the illegal use of drugs to submit evidence of participation in, or successful completion of, a treatment program as a condition to being allowed to reside in the unit.

**Section 3, Part I, paragraph B** – concerning sporadic income – Change to:

- A. Temporary, nonrecurring or sporadic income (including gifts)

**Section 4 Part X, paragraph C** – term of voucher – Add the following:

- (e) an additional extension.
- (f) an additional extension.

Comments on other sections are as follows:

### **Section 3, Part V- Utility Allowances**

Current regulations state that a review must be conducted annually. While we agree that the utility costs are rapidly increasing, at the present time, if an increase would go into effect, the Housing Choice Voucher calculation would not reflect an increase for the tenant. It actually reduces the amount an owner can ask for rent with no benefit to the tenant. This will impede the tenant's search for a unit.

If, the calculation changes so that the review process will benefit the tenant, I have no objection to conducting the review semi-annually. Until such time, however, it seems useless.

### **Section 9, Part II – Procedure for Moves**

Current policy is to begin counting days from the first day a rent payment has not been made. For example, if the subsidy is paid for February, the issue date on the voucher is March 1. The PHA cannot delay issuance of a voucher until a tenant has located a unit. The tenant at that time is still considered a participant and information must be transmitted to MTCS. There must be a set term or families could hold vouchers for a year or more without locating a unit while another family could make use of the subsidy. Compliance with 24 CFR982.312 must be taken into account; i.e., a family may not be absent from a unit for more than 180 days.

The policy concerning voucher expiration was changed from 60 to 90 days. The increase to 120 days is under consideration at this time.

### **Section 11, Part III – Termination of the HAP Contract with the Owner**

When a HAP payment is suspended, the owner does receive a notice. The notice can be amended to add the suggested comment (which is in the contract) that “the owner cannot terminate the tenant’s tenancy or evict the tenant for non-payment of rent for the housing authority’s failure to make the HAP payment.”

The situations in which payments are suspended are listed in Section 7, Part II and III paragraphs C, D, E and F.

**Section 11, Part IV – PHA Denial of Continued Assistance to the Family**

There appears to be a significant difference in interpretation in this area. According to the PHA, the Head of Household is responsible for the actions of the family members. Using the example cited, if one family member is non-compliant, the family has not fulfilled its obligation and the family as a whole is non-compliant. It is the responsibility of the Head of Household to ensure that his/her family members comply so that the family may receive assistance. The PHA has an agreement with the family as a whole; it does not have separate agreements with each individual member. This section should stay as is.

As outlined in Section 2, Part V for applicants, the grounds for denying continued assistance to participants (concerning evictions, drugs and considering mitigating circumstances) can be changed to reflect language in the federal regulations as follows:

- B Has been evicted from public housing within the past five (5) years.
- D The PHA may not deny or terminate assistance for such use or possession by a family member, if the family member can demonstrate that he or she:
  - (1) Has an addiction to a controlled substance, has a record of such an impairment, or is regarded as having such an impairment; and
  - (2) Is recovering, or has recovered from, such addiction and does not currently use or possess controlled substances. The PHA may require a family member who has engaged in the illegal use of drugs to submit evidence of participation in, or successful completion of, a treatment program as a condition to being allowed to reside in the unit.

In closing, let me express our appreciation for your comments. If you have any additional questions concerning the Annual Plan, or our response to your comments, please contact me at 751-6400 extension #1101.

Sincerely yours,

Stephen J. O’Rourke  
Executive Director

Distribution: Annual Plan file, General Correspondence file, H/M, R/H, OPPRD

Use this section to provide any additional attachments referenced in the Plans.

**Five-Year Action Plan**  
**Part I: Summary**  
**Comprehensive Grant Program (CGP)**

**U.S. Department of Housing  
and Urban Development**  
Office of Public and Indian Housing  
**5/22/01 Revisions**

OMB Approval No. 2577--0157 (exp. 7/31/98)

HA Name: **PROVIDENCE HOUSING AUTHORITY**      Locality: (City/County & State)  
**PROVIDENCE, RI**       Original       Revision No: \_\_\_\_\_

A. Development Number/Name	Work Stmt. for Year 1 FFY: 2001	Work Statement for Year 2 FFY: 2002	Work Statement for Year 3 FFY: 2003	Work Statement for Year 4 FFY: 2004	Work Statement for Year 5 FFY: 2005
RI 43 P001 001 – Chad Brown	<b>See Annual Statement</b>	79,250	269,250	174,250	162,000
RI 43 P001 01A – Admiral Terrace		844,250	706,750	758,770	316,500
RI 43 P001 002 – Roger Williams		85,000	5,000	30,000	33,500
RI 43 P001 003 – Coddington Court		0	0	0	38,000
RI 43 P001 004/6/19 – Hartford Park		821,700	702,870	395,600	727,870
RI 43 P001 005 – Manton Heights		143,500	90,000	195,000	223,000
RI 43 P001 007 – Sunset Village		5,000	0	0	9,000
B. Physical Improvements Subtotal		2,731,266	2,743,166	2,724,680	2,734,666
C. Management Improvements		240,400	242,000	252,000	237,000
D. HA-Wide Nondwelling Structures & Equipment		35,000	30,000	35,000	40,000
E. Administration	631,766	635,766	639,266	644,266	
F. Other	237,500	225,000	224,986	220,000	
G. Operations	968,000	968,000	968,000	968,000	
H. Demolition					
I. Replacement Reserve					
J. Mod Used for Development					
K. Total CGP Funds	4,843,932	4,843,932	4,843,932	4,843,932	
L. Total Non-CGP Funds	0	0	0	0	
M. Grand Total	4,843,932	4,843,932	4,843,932	4,843,932	

Signature of Executive Director \_\_\_\_\_ Date: \_\_\_\_\_ Signature of Public Housing Director/Office of Native American Program Administrator \_\_\_\_\_ Date: \_\_\_\_\_



**Five-Year Action Plan**  
**Part I: Summary (Continuation)**  
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**U.S. Department of Housing  
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HA Name: <b>PROVIDENCE HOUSING AUTHORITY</b>	Locality: (City/County & State) <b>PROVIDENCE, RI</b>	<input checked="" type="checkbox"/> Original <input type="checkbox"/> Revision No:1
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A. Development Number/Name	Work Stmt. for Year 1 FFY: 2000	Work Statement for Year 2 FFY: <u>2002</u>	Work Statement for Year 3 FFY: <u>2003</u>	Work Statement for Year 4 FFY: <u>2004</u>	Work Statement for Year 5 FFY: <u>2005</u>
RI 43 P001 008 – Dexter Manor I		46,500	87,400	134,400	132,846
RI 43 P001 009 – Dominica Manor		43,200	68,880	183,880	238,000
RI 43 P001 011 – Carroll Tower	See	58,450	100,450	67,950	182,450
RI 43 P001 012 – Kilmartin Plaza	Annual	74,150	235,500	161,500	59,000
RI 43 P001 013 – Parenti Villa	Statement	213,250	43,500	95,500	52,500
RI 43 P001 014 – Dexter Manor II		49,500	162,566	113,000	209,000
RI 43 P001 017/021 – Scattered Sites		197,500	230,000	268,830	265,000
Authority Wide		70,016	41,000	146,000	86,000



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**Physical Needs Work Statement(s)**  
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U.S. Department of Housing  
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Work Statement for Year 1 FFY: <u>2001</u>	Work Statement for Year <u>2</u> FFY: <u>2002</u>			Work Statement for Year <u>3</u> FFY: <u>2003</u>		
	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	RI 43 P001 002 ROGER WILLIAMS			RI 43 P001 002 ROGER WILLIAMS		
	Seal Exterior Masonry	N/A	25,000	Fence/Walks/Paving/Site Furniture	N/A	<u>5,000</u>
	Replace Boilers	1 Boiler	<u>60,000</u>			5,000
			85,000			
	RI 43 P001 003 CODDING COURT			RI 43 P001 003 CODDING COURT		
	RI 43 P001 004, 006, 019 HARTFORD PARK			RI 43 P001 004, 006, 019 HARTFORD PARK		
	Building Controls Site Work	1 Bldg.	25,000	Vinyl Side 2nd floors	5 buildings	50,000
	Repair/Replace Gas Lines	N/A	163,830	Replace/Upgrade Generator	1 Gen.	60,000
	Vinyl Side 2 <sup>nd</sup> Floors	5 Buildings	50,000	Install bath vent fans	52 units	15,600
	Install bath vent fans	52 units	15,600	Renovate Community Center	1 center	<u>577,270</u>
Renovate Community Center	1 Center	<u>567,270</u>			702,870	
		821,700				
RI 43 P001 005 MANTON HEIGHTS			RI 43 P001 005 MANTON HEIGHTS			
Construct new stairs/railings	1 Stair	7,500	Landscaping	N/A	10,000	
Fence/Walks/Paving/Site Furniture	N/A	15,000	New Roofs on Wood Buildings	5 Buildings	30,000	
New roofs on wood buildings.	2 Buildings	42,000	Remove Aristix Ceilings	35 units	25,000	
Water Conservation Devices	N/A	14,000	Install Prototype Vent Fan Unit	60 units	<u>25,000</u>	
Remove aristix ceilings	25 Units	25,000			90,000	
Prototype-brick window/add fan	50 Units	20,000				
Repair/Replace Community Ctr. Roof	1 Roof	<u>20,000</u>				
		143,500				
	<b>Subtotal of Estimated Cost</b>		1,042,200	<b>Subtotal of Estimated Cost</b>		797,870

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Work Statement	Work Statement for Year <u>2</u> FFY: <u>2002</u>			Work Statement for Year <u>3</u> FFY: <u>2003</u>		
for Year 1 FFY: <u>2001</u>	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	RI 43 P001 007 SUNSET VILLAGE			RI 43 P001 007 SUNSET VILLAGE		
	Water Conservation Devices	N/A	5,000 <u>5,000</u>			
	RI 43 P001 008 DEXTER MANOR I			RI 43 P001 008 DEXTER MANOR I		
	Upgrade kitchens on turnover	12 Units	10,000	Fencing	N/A	20,000
	Replace resilient floor tile	24 Units	14,400	Landscaping	N/A	8,000
	Install GFI's in Kitchens & Baths	51 Units	5,100	Upgrade kitchens on turnover	12 Units	10,000
	Abate asbestos floor tile	24 Units	10,000	Replace resilient floor tile	24 Units	14,400
	Upgrade Baths on turnaround	15 Units	6,000	Abate asbestos floor tile	24 Units	10,000
	Upgrade Ventilation	2 Motors	1,000	Upgrade Baths on turnaround	15 Units	6,000
			46,500	Upgrade Ventilation	2 Motors	1,000
				Upgrade Stairwells	N/A	18,000
						87,400
	RI 43 P001 009 DOMINICA MANOR			RI 43 P001 009 DOMINICA MANOR		
	Install energy efficient lighting	30 units	3,000	Fence/Walks/Paving/Site Furniture	N/A	30,000
	Install GFI's in kitchen & bath	50 units	5,400	Install Energy Efficient Lighting	30 Units	3,300
	Abate asbestos floor tile	20 units	8,000	Abate asbestos floor tile	20 Units	8,000
	Replace Floor Tile	20 units	12,000	Replace Floor Tile	20 Units	12,000
	Replace Kitchen Faucets	30 faucets	2,800	Replace Kitchen Faucets	30 Faucets	3,080
	Replace Water Supply Shutoffs	40 units	5,000	Replace Water Supply Shutoffs	40 Units	5,500
	Upgrade Baths on turnaround	10 units	4,000	Upgrade Baths on turnaround	10 Units	4,000
	Upgrade Ventilation	6 motors	3,000	Upgrade Ventilation	6 Motors	3,000
			43,200			68,880
<b>Subtotal of Estimated Cost</b>			94,700	<b>Subtotal of Estimated Cost</b>		156,280

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	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	
See Annual Statement	<b>RI 43 P001 011</b> CARROLL TOWER			<b>RI 43 P001 011</b> CARROLL TOWER			
	Kitchens-Cabinets/Countertops	10 units	12,000	Kitchens-Cabinets/Countertops	10 units	12,000	
	New Accordion Doors	72 doors	7,200	New Accordion Doors	72 doors	7,200	
	Install energy efficient lighting		8,000	Replace Generator	N/A	60,000	
	Asbestos Abatement	N/A	10,000	Asbestos Abatement	N/A	10,000	
	Deferred Painting	N/A	10,000	Replace Kitchen Faucets	50 units	2,000	
	Replace Kitchen Faucets	50 units	2,000	Replace Water Supply Shutoffs	10 units	1,250	
	Replace Water Supply Shutoffs	10 units	1,250	Upgrade baths on turnaround	25 units	<u>8,000</u>	
	Upgrade Baths on turnaround	25 units	<u>8,000</u>			<u>100,450</u>	
			<b>58,450</b>				
		<b>RI 43 P001 012</b> KILMARTIN PLAZA			<b>RI 43 P001 012</b> KILMARTIN PLAZA		
	Design Fire Alarm System Upgrade	N/A	10,000	Landscaping	N/A	5,000	
	Asbestos Abatement	N/A	10,000	Fire Alarm System Upgrade	N/A	200,000	
	Add Heat to Bathrooms	106 units	42,400	Asbestos Abatement	N/A	10,000	
	Replace Water Supply Shutoffs	20 units	2,750	Paint Unit Interiors	20 units	10,000	
Upgrade Baths on turnaround	20 units	8,000	Replace Water Supply Shutoffs	20 units	2,500		
Upgrade Ventilation	N/A	<u>1,000</u>	Upgrade Baths on turnaround	20 units	<u>8,000</u>		
		<b>74,150</b>			<b>235,500</b>		
	<b>Subtotal of Estimated Cost</b>			<b>Subtotal of Estimated Cost</b>			
		132,600			335,950		

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	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	
See Annual Statement	<u>RI 43 P001 013</u> PARENTI VILLA			<u>RI 43 P001 013</u> PARENTI VILLA			
	Walks/Paving/Site Furniture	N/A	10,000	Kitchens-Cabinets/Countertops	10 units	10,000	
	Landscaping	N/A	10,000	New Accordion Doors	30 doors	3,000	
	Fencing	N/A	25,000	Unit Reconfiguration	N/A	5,000	
	Repair Exterior Masonry	N/A	100,000	Asbestos Abatement	N/A	5,000	
	Install Railings in Halls	N/A	30,000	Deferred Painting	N/A	10,000	
	Kitchens-Cabinets/Countertops	10 units	10,000	Replace valves on risers	1 building	2,000	
	New Accordion Doors	30 doors	3,000	Replace Water Supply Shutoffs	50 units	4,500	
	Install Energy Efficient Lighting	N/A	8,000	Upgrade Baths on turnaround	10 units	<u>4,000</u>	
	Asbestos Abatement	N/A	5,000			43,500	
	Replace valves on risers	1 building	2,000				
	Replace Water Supply Shutoffs	50 units	6,250				
	Upgrade Baths on turnaround	10 units	<u>4,000</u>				
			213,250				
		<u>RI 43 P001 014</u> DEXTER MANOR II			<u>RI 43 P001 014</u> DEXTER MANOR II		
		Fence/Walks/Paving/Site Furniture	N/A	20,000	Repair Roof	N/A	135,566
		Replace Floor Covering	20 units	12,000	Replace Floor Covering	20 units	12,000
		Deferred Painting	N/A	10,000	Replace Vanities	20 units	<u>15,000</u>
		Replace Motorized Dampers	25 units	<u>7,500</u>			162,566
				49,500			
	<b>Subtotal of Estimated Cost</b>		262,750	<b>Subtotal of Estimated Cost</b>		206,066	

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	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost
	<u>RI 43 P001 017, 021</u> SCATTERED SITES			<u>RI 43 P001 017, 021</u> SCATTERED SITES		
	Landscaping (1-21)	N/A	10,000	Landscaping (1-21)	N/A	10,000
See	Paint Buildings (Duplex) (1-17)	8 units	15,000	Paint Buildings (Duplex) (1-17)	8 units	15,000
	Paint Buildings (Duplex) (1-21)	8 units	15,000	Paint Buildings (Duplex) (1-21)	8 units	15,000
Annual	Replacement Windows (1-17)	13 units	10,000	Replacement Windows (1-17)	13 units	25,000
	Vinyl Side Structures	N/A	132,500	Vinyl Siding Prototype (1-17)	13 units	150,000
Statement	Vinyl Flooring (1-17)	15 units	<u>15,000</u>	Vinyl Flooring (1-17)	15 units	<u>15,000</u>
			197,500			230,000
	<u>AUTHORITY WIDE</u> PHYSICAL IMPROVEMENTS & NON- DWELLING STRUCTURES/EQUIPMENT			<u>AUTHORITY WIDE</u> PHYSICAL IMPROVEMENTS & NON- DWELLING STRUCTURES/EQUIPMENT		
	Tree Pruning	N/A	8,000	Tree Pruning	N/A	8,000
	Asbestos Abatement	N/A	10,000	Asbestos abatement	N/A	10,000
	Elevator Improvements	N/A	10,000	Handicapped Unit Modifications	N/A	8,000
	Window Guards	N/A	4,016	LBP Abatement	N/A	5,000
	Electric/Water Meter Replacement	N/A	5,000	Appliance Purchase	11 units	<u>10,000</u>
	Handicapped Unit Modifications	N/A	8,000			41,000
	Handicapped Common space Renovation	N/A	10,000			
	LBP Abatement	N/A	5,000			
	Appliance Purchase	11 units	<u>10,000</u>	Computer Hardware (1475)	N/A	25,000
			70,016	Office Furnishings (1475)	N/A	5,000
				Relocation (1495)	N/A	5,000
	Computer Hardware (1475)	N/A	25,000			
	Office Furnishings (1475)	N/A	5,000			
	Relocation (1495)	N/A	5,000			
	Radios/Accessories (1475)	N/A	5,000			
	<b>Subtotal of Estimated Cost</b>		307,516	<b>Subtotal of Estimated Cost</b>		306,000

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	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	
<b>See</b>  <b>Annual</b>  <b>Statement</b>	<u>RI 43 P001 001</u> CHAD BROWN			<u>RI 43 P001 001</u> CHAD BROWN			
	General Site Improvements	N/A	10,000	General Site Improvements	N/A	10,000	
	Redesign Parking/Drainage	N/A	100,000	Redesign Parking/Drainage	N/A	100,000	
	Landscaping	N/A	10,000	Landscaping	N/A	10,000	
	Interior Doors	50 doors	5,000	Repair/Replace Gutters & Add Guards	Dev	15,000	
	Kitchens - Cabinets/Countertops	15 units	22,500	Replace Windows	20 units	5,000	
	Building Controls	N/A	5,000	Interior Doors	50 doors	5,000	
	Baseboard Upgrade in bath	15 units	3,000	GFI's in Kitchens	50 units	5,000	
	Upgrade Baths on turnaround	15 units	6,000	Security Lighting	N/A	5,000	
	Appliance Purchase	15 units	12,750	Upgrade Baths on turnaround	15 units	6,000	
			174,250	Fire Hoses & Extinguishers	N/A	1,000	
						162,000	
		<u>RI 43 P001 01A</u> ADMIRAL TERRACE			<u>RI 43 P001 01A</u> ADMIRAL TERRACE		
		Concrete sidewalks	N/A	15,000	Concrete Sidewalks	N/A	15,000
		General Site Improvements	N/A	15,000	Fencing	N/A	25,000
		Improve Drainage	N/A	72,500	Fence/Walks/Paving/Site Furniture	N/A	15,000
		Landscaping	N/A	10,000	Improve Drainage	N/A	72,500
		Circulating Pumps/Condensate Tank	N/A	5,000	Landscaping	N/A	10,000
		Retube Boilers	N/A	45,000	Replace/Repair Gas Lines	N/A	50,000
		Upgrade Baths on turnaround	15 units	6,000	Repair/Replace Gutters & Add Guards	Dev	15,000
	Baseboard Upgrade in bathroom	15 units	3,000	Replace Windows	20 units	5,000	
	Install Energy Efficient Lighting	N/A	10,000	Building Controls	System	20,000	
	Convert Admin. Building to Apartments	1 bldg	577,270	Upgrade Baths on Turnaround	15 units	6,000	
			758,770	Baseboard Upgrades in Baths	15 units	3,000	
				Replace Windows in Admin. Building	Bldg.	40,000	
				Retile Non-dwelling Space	N/A	40,000	
						316,500	
	<b>Subtotal of Estimated Cost</b>		933,020	<b>Subtotal of Estimated Cost</b>		478,500	







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	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	
See Annual Statement	<u>RI 43 P001 009</u> DOMINICA MANOR			<u>RI 43 P001 009</u> DOMINICA MANOR			
	Landscaping	N/A	5,000	Site Improvements	N/A	10,000	
	Install energy efficient lighting	33 units	3,300	Seal Coat Parking Lot	N/A	10,000	
	Upgrade/replace generator	1 generator	60,000	Replace Connecting Hall To CR	N/A	40,000	
	Reconfigure Handicap units	3 units	80,000	Refurbish Elevator Lobbies	N/A	50,000	
	Abate asbestos floor tile	20 units	8,000	Refurbish Entrance and Lobby	N/A	50,000	
	Replace Floor Tile	20 units	12,000	Trash Chute Repairs	N/A	40,000	
	Replace Kitchen Faucets	44 units	3,080	Building Controls	System	10,000	
	Replace Water Supply Shutoffs	44 units	5,500	Deferred Painting	20 units	10,000	
	Upgrade Baths on turnaround	40 units	4,000	Install Security Cameras	N/A	2,000	
	Upgrade Ventilation	6 motors	3,000	Clean Ventilation System	System	10,000	
			183,880	Upgrade Ventilation	System	3,000	
				Community Room Furnishings	N/A	3,000	
						238,000	
		<u>RI 43 P001 011</u> CARROLL TOWER			<u>RI 43 P001 011</u> CARROLL TOWER		
		Fence/Walks/Paving/Site Furniture	N/A	5,000	Landscaping	N/A	5,000
		Kitchens-Cabinets/Countertops	10 units	12,000	Repair Exterior Masonry Finish	N/A	100,000
		New Accordion Doors	72 doors	7,200	Replace Windows	20 units	5,000
		Unit Reconfiguration	N/A	5,000	Kitchens-Cabinets/Countertops	10 units	12,000
		Asbestos Abatement	N/A	10,000	New Accordian Doors	72 doors	7,200
	Replace Kitchen Faucets	50 units	2,000	Building Controls	System	10,000	
	Replace Water Supply Shutoffs	10 units	1,250	Asbestos Abatement	N/A	10,000	
	Upgrade Baths on turnaround	25 units	8,000	Deferred Painting	15 units	5,000	
	Repair PVI Hot Water Tank	N/A	7,500	Replace Kitchen Faucets	50 units	2,000	
	Repair/Replace Ventilation System	N/A	10,000	Replace Water Supply Shutoffs	10 units	1,250	
			67,950	Upgrade Baths on Turnaround	25 units	8,000	
				Renovate Common Areas	N/A	10,000	
				Fire Hoses & Extinguishers	N/A	2,000	
				Community Room Furnishings	N/A	5,000	
						182,450	
	<b>Subtotal of Estimated Cost</b>		251,830	<b>Subtotal of Estimated Cost</b>		420,450	



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	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	
See Annual Statement	<u>RI 43 P001 014</u> DEXTER MANOR II			<u>RI 43 P001 014</u> DEXTER MANOR II			
	Building Exterior Doors	N/A	3,000	Fence/Walks/Paving/Site Furniture	N/A	10,000	
	Replace vanities	20 units	15,000	Repave Parking Lot	N/A	25,000	
	Elevator Repairs	N/A	30,000	Upgrade Entrance to Common Space	N/A	25,000	
	Retube Boilers	N/A	15,000	Replace Windows	20 units	5,000	
	Make Bath Floor Watertight	N/A	<u>50,000</u>	Replace Vanities	N/A	15,000	
			113,000	Unit Locks	100 units	8,000	
				Building Controls	System	10,000	
				Repair/Replace Unit Heaters/Fan Coils	N/A	10,000	
				Seal Bath Floors	N/A	50,000	
				Fire Hoses & Extinguishers	N/A	1,000	
				Replace Floor Covering-Admin.	N/A	<u>50,000</u>	
						209,000	
		<u>RI 43 P001 017, 021</u> SCATTERED SITES			<u>RI 43 P001 017, 021</u> SCATTERED SITES		
		Fencing	N/A	5,000	Landscaping	N/A	5,000
		Landscaping (1-21)	N/A	5,000	Driveway/Walkway Repair	N/A	5,000
		Tree Pruning/Removal	N/A	5,000	Gutter Guards (1-17)	N/A	5,000
		Paint Buildings (Duplex) (1-17)	8 units	15,000	Painting Buildings (Duplex)(1-17)	8 units	15,000
		Paint Buildings (Duplex) (1-21)	8 units	15,000	Painting Buildings (Duplex)(1-21)	8 units	15,000
		Replacement Windows (1-17)	13 units	25,000	Replacement Windows (1-17)	13 units	25,000
	Vinyl Siding Prototype (1-17)	13 units	183,830	Renovate Bathrooms (1-17)	10 units	30,000	
	Vinyl Flooring (1-17)	15 units	<u>15,000</u>	Renovate Bathrooms (1-21)	10 units	20,000	
			268,830	Replace Floor Tile (1-17)	15 units	15,000	
				Replace Floor Tile (1-21)	15 units	15,000	
				Vinyl Siding Structures (1-17)	N/A	100,000	
				Vinyl Flooring (1-17)	N/A	<u>15,000</u>	
						265,000	
	<b>Subtotal of Estimated Cost</b>		381,830	<b>Subtotal of Estimated Cost</b>		474,000	



Five-Year Action Plan  
**Part III: Supporting Pages**  
**Management Needs Work Statement(s)**  
 Comprehensive Grant Program (CGP)

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

OMB Approval No. 2577--0157 (exp. 7/31/98)

Work Statement for Year 1 FFY: <u>2001</u>	Work Statement for Year <u>2</u> FFY: <u>2002</u>			Work Statement for Year <u>3</u> FFY: <u>2003</u>		
	General Description of Major Work Categories	Quantity	Estimated Cost	General Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	Operations	N/A	968,000	Operations	N/A	968,000
	Computer Software	N/A	20,000	Computer Software	N/A	20,000
	Living Skills Coordinator	1 Position	52,900	Living Skills Coordinator	1 Position	54,500
	Economic Development	N/A	10,000	Economic Development	N/A	10,000
	Police	N/A	130,000	Police	N/A	130,000
	Security Guards	N/A	20,000	Security Guards	N/A	20,000
	FM Dept.-Communications System	N/A	7,500	FM Dept.-Communications System	N/A	7,500
<b>Subtotal of Estimated Cost</b>			1,208,400	<b>Subtotal of Estimated Cost</b>		
				1,210,000		

