

The Providence Housing Authority FY 2022 Annual Plan



Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

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

A.	PHA Information.																																
A.1	<p> PHA Name: <u>Providence Housing Authority</u> PHA Code: <u>RI 001</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>7/1/22</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>2,606</u> Number of Housing Choice Vouchers (HCVs): <u>2,468</u> Total Combined Units/Vouchers <u>5,074</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. Due to the continuing Covid-19 pandemic, the PHA's Plan, Plan Elements, and all information relevant to the public hearing are available for inspection on the PHA's website at www.provhousing.org. Signage announcing the comment period and public hearing notified the public that copies of documents can be obtain by calling a designated PHA contact. Notice about the availability of viewing the plan and related documents is posted at the PHA's Administrative Office located at 100 Broad Street, 2nd Floor and at Management Offices located at: 285-F Chad Brown Street; 144 Dodge Street; 31 Salmon Street; 100 Atwells Avenue; 243 Smith Street; 160 Benedict Street; 25 Tobey Street, 300 Hartford Avenue, and 100 Broad Street. PHA posts approved PHA Plans on its website and provides each resident council with a copy of its Plans. PHA will make paper copies of materials available upon request. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA: N/A</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA: N/A																							
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B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p><u>Statement of Housing Needs</u> Since the last Annual Plan submission, PHA determined that there was an additional need for access to housing for persons with disabilities and applied for and received in 75 Mainstream Program vouchers in late 2020 that were activated on 4/1/21. PHA also determined a significant need for targeted resources to meet the needs of families that are homeless or at risk of imminent homelessness and adopted, in collaboration with the Continuum of Care (CoC), an additional strategy for meeting the needs of homeless families in the midst of the Covid-19 pandemic. PHA was awarded Emergency Housing Vouchers from HUD since the last Annual Plan submission. PHA is working with the CoC to link families with necessary supports and hosts an Ameri-Corps volunteer who works closely with families in the housing search process.</p> <p><u>De-concentration and Other Policies that Govern Eligibility, Selection, and Admissions</u> Since the last Annual Plan submission PHA adopted a selection preference for families that are homeless or at risk of imminent homelessness that is applicable to the Emergency Housing Voucher (EHV) Program. To address a significant obstacle to utilizing vouchers by EHV, Mainstream and HCV voucher holders, PHA requested and received a waiver from HUD that will allow these families an additional 30 days to lease a unit.</p> <p><u>Financial Resources</u> A Statement of Resource is included in this submission as Attachment B.1(b)(1).</p> <p><u>Rent Determination</u> The City of Providence is piloting a Guaranteed Income Project with the University of Pennsylvania as an evaluation partner. Participants in this pilot project will receive a monthly payment of \$500. After establishing that these payments would constitute income, PHA carefully examined the economic and operational impact of adopting and optional income exclusion on PHA and the disincentive to participation in the pilot that including the income would have on public housing residents. PHA has established an income exclusion for any Guaranteed Income Program payments received by any public housing family chosen to participate in the Pilot Project.</p> <p><u>Operation and Management</u> Since its last Annual Plan submission, PHA has undertaken an examination of its operational structure as part of its five-year strategic plan and has re-organized a portion of its operations to date. The reorganization includes the establishment of four new positions: Deputy Director of Housing Programs and Operations, Deputy Director of Development and Governmental Affairs, Property Management Department Special Assignment Manager, and the addition of a Foreman position in the Facilities Maintenance Department to serve the PHA's Scattered Sites portfolio.</p> <p><u>Safety and Crime Prevention</u> Since the PHA's last Annual submission, PHA has implemented a new system for deploying security guards at its elderly/disabled developments. PHA has moved from a system of guards deployed to fixed positions on a 4 p.m. to 12:00 a.m. shift to a system of roving guards covering three shifts seven days per week. A copy of the PHA's revised Security plan is attached to this submission as Attachment B.1(b)(2)</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> <p>There has been no change to the PHA's Deconcentration Policy; it is included with this submission as Attachment B.1(c)(1).</p>

<p>B.2</p>	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p><u>Hope VI or Choice Neighborhoods, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion to Tenant-Based Assistance, Conversion of Public Housing to Project-Based Assistance Under RAD</u></p> <p>On January 10, 2022, PHA issued a request for Proposals for a Repositioning/Development consultant to assist in the consideration of strategies to best preserve its housing stock and pursue the creation of new housing resources for low-income families. PHA anticipates engaging with a consultant on or before May 1, 2022. PHA plans to consider all strategies noted in HUD’s Repositioning of Assets Initiative, including, Choice Neighborhoods Initiative, demolition and/or disposition under Section 18, conversion of public housing to tenant-based assistance, RAD, and any combination of recapitalization strategies that should be considered to preserve hard units for the low-income families the PHA serves.</p> <p><u>Project-Based Vouchers</u></p> <p>The PHA anticipates that it will issue an RFP on or before June 1, 2022 to project-based up to 50 of existing of its existing HCV voucher allocation as a strategy to deconcentrate poverty and provide program participants with access to units in neighborhoods of opportunity. The PHA anticipates exploring project-basing up to 30% (including 10% exception units) of its HCV allocation over time. In FY 2022, PHA will examine the possibility of project-basing a portion of its Mainstream and VASH Program voucher allocations.</p> <p><u>Other Capital Grant Projects</u></p> <p>The PHA received a grant award, in the amount of \$974,400 from HUD, from the Lead-Based Paint Capital Funds Program to conduct lead-based paint testing and abatement in its family developments. With the assistance of a consultant, the PHA has developed a scope of work and engaged a vendor for abatement services at the Chad Brown development; abatement work is anticipated to be completed by 6/30/22. PHA has also received an Emergency Health and Safety Grant from HUD to install CO detectors in scattered site family developments; PHA anticipates completion of this project by 6/30/22. PHA will pursue any additional grant opportunities for Other Capital Projects made available by HUD in the coming year.</p> <p><u>Public Housing ACOP</u></p> <p>The PHA will continue its review and updating of its public housing Admission and Continued Occupancy Policy (ACOP) in the coming year. In particular, PHA will consider changes to its transfer and grievance policies and its public housing lease.</p> <p><u>Administrative Plan for the Housing Choice Voucher Program</u></p> <p>The PHA will continue its review and updating of its Administrative Plan that governs the operation of the Housing Choice Voucher Program.</p> <p><u>Units with Approved Vacancy for Modernization</u></p> <p>PHA anticipates that eight (8) units will be approved for vacancy for modernization in the coming year.</p>
<p>B.3</p>	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p><u>Goal 1: Identifying and Pursing Opportunities to Preserve and Expand Affordable Housing</u></p> <p>Since the last Annual Plan submission, PHA has issued a Request for Proposals for a repositioning/development consultant. PHA expects to award a contract and have a consultant engaged by 5/1/22. PHA has briefed its Resident Advisory Board about this RFP and a project to develop a portfolio plan for PHA’s public housing properties over the next two years; members have expressed enthusiasm about resident participation in the process.</p> <p>As part of a strategy to preserve and expand affordable housing, PHA issued an RFP in June of 2021 seeking to project-base an additional 50 HCV vouchers. PHA received 11 proposals, and after careful consideration, awarded PBVs to six organizations. PHA’s investment of these 50 PBVs helped leverage the preservation of 69 affordable existing units and the construction of 125 new units of affordable housing in Providence. Based on this past year’s experience, PHA developed a Standard Operating Procedure (SOP) for project-basing vouchers that will guide the PBV RFP process in 2022. Based on this SOP, PHA is developing a SOP specifically geared to possible project-basing of VASH and Mainstream Program vouchers.</p>

Since the last Annual Plan submission, PHA has pursued efforts to support environmental sustainability in several different areas. PHA and its partners housing authorities and the RI Public Housing Directors Association have executed a contract with a vendor for an off-site solar farm; the initial rate reduction application has been approved by HUD. PHA's Maintenance and Procurement staff continue to explore green cleaning products, with several being field tested as of this submission. In addition, PHA has switched to the use of lithium batteries with 10-year lifespans for all of its CO detectors. PHA continues its longstanding collaboration with National Grid and an agreement has been reached for the installation of two energy efficient boilers at the Dexter Manor development, at no cost to PHA, in the coming year. In addition, PHA is also pursuing the possibility of an energy efficient appliance replacement project in the coming year with National Grid.

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

In an effort to enhance safety and security in its developments for elders and persons with disabilities, PHA re-designed its deployment of security guards, transitioning from a system of security guards at fixed locations on 4:00 p.m. – 12:00 a.m. shifts to a system of roving patrols seven days per week, 24 hours per day. Security patrols continue to be provided at family developments without change by the Public Housing Unit of the Providence Police Department. In 2021 PHA worked with its Resident Advisory Board to develop a Safety and Security Survey. The survey has been administered at all of the PHAs developments for elders and persons with disabilities; the survey will be administered at family developments in January and February of 2022. PHA will use the results of this survey to develop place-based strategies for further enhancing safety and security. Throughout this period, PHA's Victims of Crime Act (VOCA) Community Safety Coordinators helped PHA residents needing support and referral to services to address the trauma of victimization by crime. In this period, PHA received a micro grant that will be used to develop and launch a new violence prevention initiative to identify and address the needs of the LGBTQ+ community. PHA is currently in the process of developing partnerships with organizations that can provide support and education, as well as assist in developing outreach strategies to engage this underserved part of our community.

Also related to safety and security, PHA completed the design for new building entry doors at five high rise buildings for elders and persons with disabilities and awarded a contract to a vendor. Supply chain interruptions delayed the project for a period; PHA anticipates the door replacement project to commence on January 31 at the Dexter Manor development with the remaining four locations completed by June 30, 2022. In its developments for families, PHA is in the process of designing a door replacement project for exterior doors at the Coddling Court development. In June 2021, PHA completed the upgrade of its security camera system at the Carroll Tower development with funding from the Capital Fund Program and a grant for the RI Office of Healthy Aging. PHA has received an additional grant from this source that is funding camera upgrades at the Dominica Manor development that will commence in April 2022.

In the fall of 2021 PHA commissioned structural assessment studies by a consultant for all of its high-rise buildings, the Sunset Village development and "D" type construction buildings at the Hartford Park family development. PHA expects receiving the consultant's report by the end of the current fiscal year.

At Manton Heights, the Lead Based Paint Remediation Project, is underway with the start of exterior work in January 2022, with completion expected by June 30, 2022. Although this project offers the potential that residents may be displaced for a night, PHA has requested authorization from HUD to take three units off-line temporarily to create hospitality units where residents could be housed on site if the need arises for displacement. Despite challenges posed by vendor staffing shortages, the CO Detector Installation Project at PHA scattered sites is 70% complete; full completion is expected for June 30, 2022.

Since its last submission, PHA undertook a number of initiatives designed to communicate that its properties are owned and managed by an engaged landlord. These initiatives included the installation of new fencing on Whelan Road in the Hartford Park development, contracting with an outside landscaping vendor for grass and tree trimming services at the Scattered Sites development, Roger Williams, Coddling Court, and a portion of Manton Heights. In addition, PHA invested in flowers and plantings at its sites to beautify properties. A significant, multi-year collaborative project, the Manton Bike Pathway, was completed in late 2021 and a dedication of this new community resource will occur in Spring 2022. We look forward to the impact of this new recreational resource on resident health and community engagement. At the Hartford Park development, PHA reached 90% completion of an outdoor pavilion late in 2021; this resource will provide residents with an attractive gathering space for many years. During this reporting period, PHA negotiated with the City of Providence for authorization to re-program funds awarded originally for an adult fitness park to be used to renovate gyms at Manton Heights and Chad Brown; PHA anticipates soliciting bids for the work in the Summer of 2022.

The Covid-19 pandemic has had a significant impact on the economic fortunes of public housing residents. During this reporting period, PHA successfully increased access to workforce development opportunities with the receipt of renewal funding for a WIOA youth employment program, a 4th year of funding for the *One Providence for Youth Summer* employment program, a new City grant for year-round, paid internships and apprenticeships for youth, and a RI Covid-Response CDBG grant for adults. PHA developed hybrid educational program delivery systems with community partners to continue economic self-sufficiency and adult education programs online and in small groups.

Despite the challenges of the pandemic, PHA's public housing residents continue to pursue the dream of homeownership and the wealth-building opportunity homeownership provides families, particularly BIPOC families. At the close of calendar 2021, the PHA's Homeownership Program Coordinator had a caseload of 48 clients, with two families expected to close on the purchase of home in January 2022. One of these families is headed by "Angie," a 14-year resident of public housing who will be moving into her own home and making way for the next family in need of the support and pathway to self-sufficiency provided by the public housing program.

Through a continued partnership with HarborOne Bank, residents have had continued access to financial literacy workshops and training. Other key partnerships in assisting residents and HCV participants in navigating the financial difficult times in this pandemic have been the United Way of RI Island and Rhode Island Housing, both organizations administered sources of rental relief and utility funds during this reporting period. Since the last reporting period, PHA staff worked with 418 resident and 77 HCV families and their landlords to aid in filing funding applications. These collaborative efforts resulted in residents and HCV participants receiving \$1,018,232 to cure rental and utility arrearages in the current fiscal year to date.

During this current fiscal year to date, PHA's commitment to ensuring equitable access to testing, vaccinations, and PPE for residents resulted in the administration of 998 Covid tests, 46 Covid booster vaccinations, provision of nearly 1,200 Covid self-testing kits, and delivery of nearly over 5,300 KN95 masks to residents. Throughout the pandemic, PHA utilized its mass messaging technology to deliver multi-lingual messages about Covid prevention and testing and vaccination events.

During the pandemic, a partnership with CODAC Behavioral health brought pop-up clinics to PHA developments where residents had access to diabetes, high blood pressure, and behavioral health screenings and referrals. Recognizing that many residents were struggling with the trauma and stress of the prolonged pandemic, the PHA's Resident Services Department established a multi-disciplinary Critical Incident Response Team (CRT). The CRT, comprised of a Licensed Independent Clinical Social Worker, VOCA Community Safety Specialists, Health Outreach Worker, and an Addiction Specialist, triaged referrals of residents needing intervention and referral to services to address crisis situations impacting safety and tenancies.

Goal 3: Cultivate, Enhance, and Evaluate Strategic Partnerships

Throughout this reporting period, PHA continued and expanded partnerships with the Rhode Island Department of Health, RI Disaster Medical Assistance Team (DMAT), RI National Guard, Lifespan Health Care, Walgreens Pharmacy, Providence Community Health Centers, and the Central Providence Health Equity Zone (HEZ) to bring vaccinations and testing clinics, testing supplies, and PPE to the families served by PHA.

At any time, persons with disabilities and homeless families encounter many barriers to equal access to affordable housing – the pandemic has exacerbated these obstacles. In an effort to increase access to affordable housing PHA applied for and received 42 Emergency Housing Vouchers (EHV). PHA is working with Continuum of Care partners to devise and implement collaborative strategies to ensure Mainstream and EHV voucher holders have the support necessary to be able to lease units. Included in these strategies are bi-weekly meetings with partners to problem-solve obstacles families encounter and an Ameri-Corps volunteer who is stationed at the PHA to provide housing navigation assistance. In 2021 the partnership noted that many EHV voucher holders were unable to lease units within the time constraints mandated by the program. PHA requested and received a waiver from HUD to extend the amount of time these families have to lease a suitable unit. The partnership has also identified a strategy that might be effective in assisting Mainstream Voucher families in securing units would be for PHA to consider project-basing a portion of its allocation of these program vouchers. PHA is exploring the potential for how project-basing Mainstream Vouchers could result in families gaining access to units in neighborhoods of low poverty concentration and opportunity and families with disabilities having the additional supports necessary for successful tenancies and has recently met with the regional HUD Fair Housing office to discuss fair housing considerations related to project basing of Mainstream vouchers.

During this reporting period, PHA staff served on a wide range of task forces and advisory groups, included but not limited to: Covid Recovery Task Force, Statewide Eviction Prevention Working Group, and Providence City Council Housing Crisis Task Force. Also, during this time period, PHA has been able to increase membership in its own Program Coordinating Committee (PCC), an inter-agency advisory group that meets quarterly to share information and resources and develop strategies for meeting the needs of families served by PHA. In this reporting period, PHA also compiled a wide range of statistical information in its Resident Characteristics Report that will inform statements of need and provide data points that are critical to effective advocacy and partnership development.

Throughout the pandemic PHA has maintained a strong relationship with its Resident Advisory Board using Zoom to conduct monthly meetings and engage in regular phone contact with members. The monthly meetings provide a forum for sharing information and developing strategies for assisting residents to cope with the Covid crisis. Meetings often feature outside guest speakers who presented on issues of interest to residents, such as redistricting after the 2020 census, understanding the opioid crisis and addiction, managing stress, and protecting oneself from scams and frauds. A key concern of RAB members in this reporting period was maintaining and building a sense of community within their developments during continued social distancing and Covid restrictions. Members worked closely with staff to organize outdoor coffee hours, ice cream socials, and holiday events that were well attended by residents. In the Summer of 2021, PHA conducted the nomination and election process for the RAB. As a result of increased outreach and use of PHA's mass messaging technology, interest in serving on the RAB resulted in PHA having representation from two family developments that had not previously had representatives.

Goal 4: Continuously Improve PHA Internal Management and Operations

The PHA devoted significant time since the last Annual Plan examining the operational structure of the PHA. One outcome of this effort has been an initial phase of reorganization of the PHA in which two Deputy Director positions have been established – a Deputy Director of Development & Government Affairs and a Deputy Director of Housing Programs & Operations. Other elements of this re-organization include an additional Foreman position to oversee maintenance operations more effectively for PHA's scattered site units and a Special Assignment Manager to oversee developing programs and initiatives spanning the Leased Housing and Property Management Departments.

Recognizing that a number of retirements in key positions may occur in the next five years, PHA led by the Human Resources Department, engaged in succession planning activity in this reporting period. Succession planning activities have included assessing future structures of departments, identifying potential in-house candidates for future leadership roles, and assessing training needs for creating future leaders. In the PHA's Finance Department, succession planning and cross-training have ensured the seamless operation of critical financial functions despite staffing challenges due to the pandemic. In all PHA Departments, a process is underway for assessing the skills set necessary for a high performing housing authority and identify training programs. In addition to succession planning, the PHA's Human Resources Department and has been discussing training plans and apprenticeship opportunities with several bargaining units that represent staff in facilities management. In addition to developing training plans and apprenticeship opportunities, the PHA successfully negotiated three-year contracts with three separate bargaining units this year.

To meet the challenges of the pandemic, PHA engaged in cross-Departmental initiatives designed to generate strategies for meeting the obstacles to high performance that PHAs are encountering. The Property Management and Facilities Maintenance Departments have instituted regularly scheduled team meetings of Foremen and Property Managers that are generating innovative, field-driven approaches for launch in 2022 to address challenges such as using technology to conduct NSPIRE inspections; work order quality control and resident satisfaction with services; and effective pest control and improving resident housekeeping to support REAC success. In this model, Property Manager/Foreman teams research effective approaches, develop standard operating procedures, and propose them to the full working group for refinement and piloting. PHA also utilized and will continue to utilize special teams approaches to addressing challenges such as vacant unit turnover and eliminating routine work order backlog resulting from necessary restrictions on in-person contact during the pandemic. This approach has significantly reduced Covid work order back log and allowed PHA to realize a 97.8% occupancy level at 12/31. In the current fiscal year to date, PHA has completed over 13,000 work orders.

The Resident Services and Property Management Departments have developed the Housing Preservation Program to address non-payment of rent and other lease violations; in the current fiscal year to date, the program resulted in 418 successful applications to RentRelief RI that provided

	<p>\$883,686 to public housing residents to cure rental and utility arrearages. In addition, the Program has referred residents to wide range of services that addressed factors contributing to non-payment of rent or lease violations. PHA has not filed any new evictions for non-payment since March of 2020. Also, during this time period, PHA reviewed inter-departmental standard operating procedures for responding to requests for reasonable accommodations and trained three staff to serve as additional points of contact for residents and program participants seeking a reasonable accommodation to a disability.</p> <p>The Leased Housing Department has undertaken a comprehensive assessment of operations that is 75% complete and has yielded strategies for streamlining processes and creating efficiencies. Despite the challenges of the pandemic, PHA has been able to maintain a 99% subsidy utilization rate and a 95.7% voucher utilization rate at 12/31/21, qualifying PHA for high performer rating in this area of SEMAP. One such outcome of the assessment has been the innovation of having a specialized team responsible for public housing and HCV intake, as well as coordinating special voucher programs such as EHV, Mainstream and VASH. This activity has led PHA to consider ways in which it might cross-train Public Housing and Leased Housing staff to conduct common tasks such as recertification. This reporting period has been marked by increased efforts to engage existing and attract new landlords to the HCV program. PHA has engaged in research about best practices in landlord engagement and has conducted interactive sessions with project-based landlords to develop strategies for addressing challenges these landlords experience. As a means of increasing landlord participation in the VASH program and accessing additional units for veterans, PHA established a higher payment standard for VASH vouchers in accordance with the new HUD guidance released in 2021. In an effort to increase housing choice for HCV participants in general, PHA adopted Small Area FMRs in all its voucher programs for two higher cost zip codes. PHA also continued use of an incentive program to attract landlords owning properties in neighborhoods of opportunity; in the past six months landlords received \$9,750 in incentive payments (funded by a grant) resulting in 16 new landlords becoming engaged in the HCV program and families being able to rent units in neighborhoods of opportunity. Like public housing residents, HCV participants are experiencing financial hardship during the pandemic. Leased Housing staff also worked with participants and landlords to help them apply for RentRelief RI funds. Fiscal year to date, these efforts resulted in participants receiving \$95,366 to cure rent and utility arrearages. Also in relation to the HCV program in this reporting period, the State of Rhode Island established new legislation prohibiting source of income discrimination. This new law includes receipt of HCV assistance as a source of income. PHA contributed to the development of this new legislation by community organizations by surveying HCV participants about their experiences in leasing units with a voucher – a significant number reported landlord refusal to rent to persons with a voucher. The results of these surveys were shared in hearings about the legislation. PHA is proud to have contributed to a law that addresses discrimination against voucher holders and looks forward to participating in activities that increase awareness and enforcement of the law.</p> <p>As a means of improving effectiveness and efficiency, PHA has examined ways in which to leverage technology. The adoption of a mass messaging system that has the ability to transmit voice messages, text messages, and e-mail in multiple languages has greatly enhanced the PHA's ability to provide residents with critical information about programs and opportunities available to residents, program participants, and landlords. Staff have adopted the use of technology in enhanced ways to better conduct remote recertifications that not only served to protect health and safety, but also provided greater convenience for residents and program participants. Throughout this reporting period, the PHA's Information Technology Department has engaged in far reaching activity to upgrade systems, including completing a network assessment to improve security and consistency to employee access to the Internet and network.</p> <p>In this reporting period, PHA engaged in efforts to secure additional funding to meet the needs of families the PHA serves that has included FEMA reimbursement of Covid expenses, security upgrades, and continued and increased supportive services programming. To increase its capacity for grant writing, PHA engaged a grant writing consultant in this reporting period. PHA looks forward to how this enhanced capacity will impact our efforts to provide and develop quality and safe affordable housing opportunities and services to address the need of Rhode Island residents in the coming year.</p>
B.4	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. The most recent 5-Year Plan was approved in EPIC on 11/25/20. The most recent CFP Annual Statement was approved on 10/29/21.</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p>

	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.2	Certification by State or Local Officials. Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y N <input type="checkbox"/> <input type="checkbox"/> If yes, include Challenged Elements.
C.5	Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> (b) If yes, please describe:
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing (AFFH). Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item. PHA is not required to complete Section D at this time.

	<u>Describe fair housing strategies and actions to achieve the goal</u>
	<u>Describe fair housing strategies and actions to achieve the goal</u>
	<u>Describe fair housing strategies and actions to achieve the goal</u>

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

- A. **PHA Information.** All PHAs must complete this section. (24 CFR §903.4)
 - A.1 Include the full **PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type,** and the **Availability of Information,** specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))
- B. **Plan Elements.** All PHAs must complete this section.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. ([Notice PIH 2011-47](#))

Mixed Finance Modernization or Development. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

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

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

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

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

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

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

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

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

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan

statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).

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

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

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

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

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

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

C. Other Document and/or Certification Requirements.

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

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

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

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

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

D. Affirmatively Furthering Fair Housing (AFFH).

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

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

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

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

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

Providence Housing Authority Attachment B.1(b)(1)
Statement of Financial Resources: Planned Sources and Uses

Sources	Planned \$	Planned Uses
1. Federal Grants FY 2021 grants		
a Public Housing Operating Fund	\$17,231,886	
b Public Housing Capital Fund	\$6,819,448	
c HOPE VI Revitalization	\$0	
d HOPE VI Demolition	\$0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$26,332,626	
f) Public Housing Drug Elimination Program including any Technical Assistance funds	\$0	
g) Resident Opportunity and Self-Sufficiency Grants	\$396,856	
h) Community Development Block Grant	\$87,812 \$27,000 \$79,761 \$33,240	Doors to Safety KP & PV HP Renovations Staff Support - Direct Services Chad Brown Recreation Facilities Reno.
	\$134,532 \$20,000 \$85,000 \$25,000 \$14,825 \$20,000 \$10,000 \$43,000	Workforce Development CB Transfer Switch Doors to Safety DM&CT Manton Heights Discharge CB Security Camera and WIFI MH Security Cameras Coddington Ct Transfer Switch Thomas Anton Community
Other Federal Grants list below		
HUD Lead-based Paint Capital Funds Program	\$932,862	LBP testing and abatement at Chad Brown, Hartford Park and Manton Heights
HUD - Emergency Health and Safety Grant	\$126,282	Installation of CO2 detectors at scattered site family development units
HUD - Family Self Sufficiency	\$49,845	PH and Sect 8 Self Sufficiency
WIOA – Youth Comprehensive Program	\$97,812	Workforce readiness and employment for youth

~ VOCA	\$50,634	Victims of Crime Assistance
2. Prior Year Federal Grants (unobligated funds only) (list below)		
CFP 2021	\$6,819,448	
CFP 2020	\$1,936,350	
CFP 2019	\$260,886	
CFP 2018	\$322,252	
Mainstream Voucher Award 2018, 2020	\$719,768	
EHV Voucher Award 2021	\$399,924	
3. Public Housing Dwelling Rental Income	\$8,946,000	
Sources	Planned \$	Planned Uses
4. Other income		
Excess Utilities	\$93,600	
Investment Income	\$14,950	
Fraud Collection S8	\$15,500	
S8 Port Fees	\$100,000	
Miscellaneous Tenant Charges	\$59,600	
Misc .Income -Antenna Rental/Cox/Office space	\$315,000	

Sources	Planned \$	Planned Uses
4. Non-federal sources list below		
Blue Cross Blue Shield	\$38,494	Americorps worker and direct assistance
CP HEZ Community Health Worker	\$21,265	
RIDE - Genesis	\$22,899	Adult Education
CP HEZ- Economic Self Sufficiency @ HP	\$20,408	

Security Grant Dominica Manor - OHA	\$14,166	Security Equipment
Peoples Garden Project	\$8,143	Community Garden
BCBS Blue Angels	\$15,782	Direct Assistance
	,	
Total Resources	\$72,762,856	

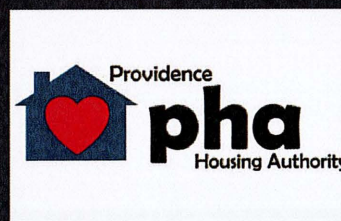


OCTOBER 2021

PROVIDENCE HOUSING AUTHORITY

SECURITY PLAN

OFFICE OF SECURITY OPERATIONS



Providence Housing Authority Security Plan 2021

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Introduction

The Providence Housing Authority's (PHA) mission is that the PHA provides and develops quality and safe affordable housing opportunities and services to address the needs of RI residents. The Providence Police Department's Public Housing Unit (PHU) and the PHA's own security staff comprise the PHA's Security Program. The police and security staff work collectively along with the entire PHA staff to fulfill the agency's mission.

The program primarily provides policing and security services to six family developments, seven elderly/disabled high-and moderate-rise developments and 244-units of scattered site housing located throughout the city.

The PHA Developments are located in the following sections of the City of Providence:

- Smith Hill
- Lower South Providence
- West End
- Hartford
- Olneyville
- Wanskuck
- Federal Hill
- Downtown Providence
- Carroll Tower
- Roger Williams
- Coddington Court
- Hartford Park
- Manton Heights
- Chad Brown, Admiral Terrace, Sunset Village
- Dominica Manor, Parenti Villa
- Dexter Manor I & II

The Providence Housing Authority is the largest landlord in Rhode Island: it owns and operates more than 2,600 apartments. In addition, the PHA serves more than 2,400 families through Section 8 Rental Assistance Program. In sum, the PHA touches nearly 12,000 low-income Providence residents. The population served by the PHA's public housing program is a diverse population with 1% identify as Asian, 22% Black/African American, 1% Native American, 6% Other and 68% White. Seventy-two percent of PHA residents identify as Hispanic/Latino. As a primary language, 65% percent of resident speak Spanish and 2% speak a language other than English.

The PHA is dedicated to maintaining a high level of security for the residents of all of the developments. Achieving this involves not only the utilization of the sworn PPD police officers and the PHA security personnel, but also utilizing the entire staff of the PHA and its residents.

Section 1: Security Table of Organization and Equipment

The Office of Security Operations of the PHA is comprised of the following entities:

- Providence Police Public Housing Unit
- PHA Security Dispatch Monitors
- PHA Security Officers
- PHA Security Department Director/Associate Director
- PHA Fraud Investigator

All of the above components provide an integrated effort to achieve and maintain a high level of security in the developments.

The Public Housing Unit Officers

The PHU Officers are Providence Police Officers who are assigned by the Providence Police Department to patrol the PHA developments and other subsidized housing located throughout the city. This unit is recognized as being expert in addressing the problem of crime in public housing. In the Police Department Table of Organization, the officers assigned to this police unit are divided into teams consisting of two officers per team. These teams are under the direct supervision of the PHU sergeant. (*A third team will be added after the next PPD academy graduates (Fall 2021). After another team is added, the schedule will remain the stay the same*.)

The future 6 patrol officers assigned to the PHU allow for three to four officers to be available for duty daily. Two officers are on day-off status due to the four days on and two days off rotating duty schedule. This unit operates at peak efficiency when there are no fewer than six patrol officers assigned to the unit. When vacancies occur in the PHU they are filled by the police department in a timely manner.

PHU Weekly Duty Schedule (Sample)

Providence Police Department Public Housing Unit Weekly Duty Hours Assignment

For the week of Sunday 7/25/2021 to Saturday 7/31/2021

Officers	Sun. 7/25	Mon. 7/26	Tues. 7/27	Wed. 7/28	Thurs. 7/29	Fri. 7/30	Sat. 7/31
OIC							
Sgt. R. Hull							
PPD Assigned Hours	Day Off	Day Off	1700-0100	1700-0100	1700-0100	1700-0100	1700-0100
PHA Assigned Hours							
P.O. K. Melfi							
PPD Assigned Hours	1700-0100	Day off	Day off	1700-0100	1700-0100	1700-0100	1700-0100
PHA Assigned Hours				1300-1500	1300-1500	1300-1500	1300-1500
P.O. I. Yousif							
PPD Assigned Hours	1700-0100	Day off	Day off	1700-0100	1700-0100	1700-0100	1700-0100
PHA Assigned Hours				1300-1500	1300-1500	1300-1500	1300-1500
P.O. M. Mena-Torres							
PPD Assigned Hours	Day off	1700-0100	1700-0100	1700-0100	1700-0100	Day off	Day off
PHA Assigned Hours		1300-1500	1300-1500	1300-1500	1300-1500		
P.O.							
PPD Assigned Hours							
PHA Assigned Hours							

The PHU officers maintain a good working relationship with all of the departments in both the Police Department and the PHA. They also maintain a good working, cooperative and coordinating relationship with outside law enforcement agencies such as the Rhode Island State Police, FBI, DEA and the HUD Office of the Inspector General (OIG). These

relationships foster collaborative approaches to addressing the problems of crime in the developments and addressing the quality-of-life issues.

The City of Providence and the PHA share in the budgeting of the PHU, and the officers assigned to the unit. The City is responsible for the payment of the officer's police salaries, benefits, pension plan contribution and the time spent testifying in court. The PHA compensates the officers for hours worked beyond the regular full-time hours that are paid by the city.

The number of hours per week that a PHU officer can work for the PHA is dependent on the PHA's annual budget. Historically each officer has usually worked 16 hours per week, but budget reductions can have a negative impact on the weekly hours an officer is assigned.

PHA Security Dispatch Monitors

PHA has security systems that include cameras and alarms at all ground floor access points of the High-Rises, including the main lobby and service doors. In addition, cameras were installed in elevators, community rooms, laundry areas and at strategic locations on the exterior of the buildings with the specific intent to monitor the parking lots. Card access readers have been installed, along with cameras that monitor activity with individual access cards being issued to the residents and staff at high-rise locations. The 269 security cameras in the High-Rises and family developments are continuously updated when unviewable, aged out or replaced upon failure. PHA's most recent security upgrade was the installation of new cameras at its Carroll Tower property in June of 2021.



Central Security Dispatch Monitor Station

PHA maintains a centralized camera monitoring system in the PHU/Security office located in the High-Rise at 335 Hartford Avenue. Two Security Dispatch Monitors, along with Facilities Management Dispatchers, monitor this system 24 hours per day, 7 days a week. A secondary (backup) system was also installed in the Facilities Management Dispatch Office to allow for those PHA Facilities Management Dispatchers to also monitor the security system. Since initial installation, the system has been upgraded and expanded to the family developments. Over 269 cameras authority wide are now in use monitoring PHA properties and High-Rise buildings.

In addition to monitoring the security system, the Dispatch Monitors are also responsible for conducting criminal background checks on resident applicants, processing of access cards, data-basing security and police activity, and general administrative duties. They also serve to dispatch the PHU officers and PHA security personnel to calls for service or to contact the regular Police Department to respond for a call for service should the PHU officers be off duty or unavailable. The Dispatch Monitors will also notify fire/rescue services if needed.

Security Dispatch Monitor Weekly Duty Schedule (Sample)

**Providence Housing Authority
PHA Security Monitor
Weekly Duty Hours Assignment**

For the week of Sunday 6/27/2021 to Saturday 7/3/2021

Monitors	Sun. 6/27	Mon. 6/28	Tues. 6/29	Wed. 6/30	Thurs. 7/1	Fri. 7/2	Sat. 7/3
James Lynch	1600-2400	1600-2400	1600-2400	1600-2400	Day Off	Day Off	1600-2400
Tom Green	Day off	0800-1600	0800-1600	0800-1600	14000-2200	1400-2200	Day off

Shifts: The actual first shift of the day is the 0000-0800 shift.

PHA High-Rise Security Officers

The PHA established a security force in 1991. The PHA Security Force currently is staffed by 10 full-time uniformed security officers and 1 part-time uniformed security officers who currently provide roving security services 24 hours per day, seven days per week. Staffing levels and deployment are subject to change depending on circumstance, need and funding availability. These uniformed security officers, who are unarmed and have no arrest powers, patrol the PHA's elderly/disabled High-Rise buildings.

In 2017, the PHA's full-time Security Officers became a certified, collective bargaining unit called "The Providence Housing Authority Security Guards" under the Rhode Island Laborers Union, Local 1217.

PHA Security Weekly Schedule (Sample)

SAMPLE

**PROVIDENCE HOUSING AUTHORITY
HIGH-RISE SECURITY PROGRAM**

WEEKLY DUTY SCHEDULE							
	SUN	MON	TUE	WED	THUR	FRI	SAT
	6/27/21	6/28/21	6/29/21	6/30/21	7/1/21	7/2/21	7/3/21
PHA SECURITY ROVING ALL HIGH-RISES	12am-8am CORNELL ROVING	12am-8am CORNELL ROVING	12am-8am CORNELL ROVING	12am-8am KELLAM 2 ROVING	12am-8am KELLAM 2 ROVING	12am-8am CORNELL ROVING	12am-8am CORNELL ROVING
		7am-3pm TAYLOR ROVING 8am-4pm MARTINEZ ROVING	7am-3pm TAYLOR ROVING 8am-4pm MARTINEZ ROVING 8am-4pm MIRANDA ROVING	7am-3pm TAYLOR ROVING 8am-4pm MARTINEZ ROVING 8am-4pm MIRANDA ROVING	7am-3pm TAYLOR ROVING 8am-4pm MARTINEZ ROVING 8am-4pm MIRANDA ROVING	7am-3pm TAYLOR ROVING 8am-4pm KELLAM 2 ROVING 8am-4pm MIRANDA ROVING	8am-4pm KELLAM 2 ROVING 10am-6pm WHITFIELD ROVING
	4pm-12mid WHITFIELD MIRANDA ROVING	4pm-12mid WHITFIELD KELLAM 2 ROVING	4pm-12mid M.PAGAN C. PAGAN ROVING	4pm-12mid M.PAGAN C. PAGAN MARTINEZ ROVING	4pm-12mid M.PAGAN C. PAGAN WHITFIELD ROVING	4pm-12mid M.PAGAN C. PAGAN WHITFIELD ROVING	4pm-12mid M.PAGAN C. PAGAN MARTINEZ ROVING

GREEN 40 MARTINEZ 40 CORNELL 40 MIRANDA 40 M.PAGAN 40 WHITFIELD 40 KELLAM 2 40 TAYLOR 40 C. PAGAN 40

(*At the time of this publication, 1 security officer position was vacant and being filled.)

Security Officers are recruited, trained, and supervised by the Security Director, Associate Director. PHU officers also play a role in the training of Security Officers. All Security Officers must have successfully completed a criminal background check. Security Officers provide approximately 300-400 hours of service weekly. The number of hours that are worked by the Security Officers depends on the need and the annual budget.

The Security Officers are in direct radio communication with the Security Dispatch Monitors, the Facilities Management Dispatcher and also the PHU Officers. This allows for the Security Officers to receive immediate advice or assistance if needed.

While on duty, the Security Officers are responsible for patrolling buildings that they are assigned to, as well as the parking areas. The officers complete and submit a written security report that is used to inform management of any problems that occurred in the building. In addition, that information is reviewed by the Security Department Director and the Associate Director and is data-based by the Security Department Director, Associate Director or Security Dispatch Monitors. Any incidents that need immediate attention are e-mailed directly to the respective manager or other PHA staff.

Security Department Director and Associate Director

Responsibilities of the Office of Security Operations Director and Associate Director include scheduling and administrative oversight of the security program, maintaining and updating all records and other data related to police/security activity and operations in the PHA developments. This information is updated on a daily basis. The information generated is compiled in a PHU weekly police/security activity report, a monthly report, a fiscal year report and also a calendar year report. These reports are closely reviewed to identify trends in activity in and around public housing properties. On

- Hartford Tower 335 Hartford Ave. Hartford Park neighborhood

Scattered Site Patrol Areas:

The PHA scattered sites are located throughout the City.

Additional Patrol Areas/Developments

The PHU additionally patrols or provides technical assistance to other privately owned high-rises and developments that have PHA Section 8/Leased Housing tenants. Examples are Lockwood Plaza, Sutterfield Homes, and Williams Woods.

Section 3: Police and Security Deployment

The PHU, PHA Security Dispatch Monitors and the PHA Security Officers provide security at different times of the day. There is some form of security coverage throughout a day, that coverage being provided by one or more of the previously mentioned police and PHA Security personnel. The PHA Security Director and Associate Director are responsible for overseeing the scheduling and deployment of the police/security personnel to ensure that the needs of the residents are satisfied and that the identified high problem times are adequately covered.

PHU Officer Patrol Hours and Areas of Responsibility

The PHU officers are assigned to work 8 hours per day on their regular city time and work schedule and then, on average, 4 additional hours on PHA extended coverage time. This provides for a total of 12 hours per day of police coverage, availability, and visibility. All PHA hours are assigned to be worked before the police department scheduled hours. For instance, the if the police department scheduled hours are 5:00pm to 1:00am (8 hours), then the PHA hours assigned to the officers would be 1:00pm to 5:00pm (4 Hours). The actual number of hours assigned to work for the PHA is dependent on the budget status of the PHA. There have been periods where the PHU officers have worked more hours on PHA time and there have also had to be less hours assigned due to budget constraints.

The PHU officers are currently divided into 2 teams consisting of two officers each. With the possibility of additional officer graduating the academy in the Fall of 2021, PHA may have an additional team assigned to the PHU. The teams are currently assigned to the following developments:

- Hartford Park and Manton Heights area
- Codding Court and Wiggin Village and Roger Williams (Shared)
- Chad Brown, Admiral Terrace & Sunset Village

Each of the team's patrol area is located in one of the nine police patrol districts in the City, the district assigned being dependent on the location of the housing developments to be patrolled. PHU officers can respond to calls at public and private housing locations that are located outside the boundaries of their assigned districts. Since 2012, there has been a sergeant assigned to the PHU as overall "Officer in Charge" of the PHU team and they work closely with the Security Director and Associate Director to provide appropriate strategic interventions, patrol plans, training, etc. for the PHA.

PHA Security Dispatch Monitor Schedule

There are two PHA Security Dispatch Monitors that are assigned the duty of monitoring the security system. The Security Dispatch Monitors are cross trained in the duties of the

Facilities Management (FM) Dispatchers. The security system is monitored 24 hours a day 7 days a week by the Security Dispatch Monitors and by the FM dispatchers. The scheduling of the Security Dispatch Monitors requires that during several shifts during the week FM dispatcher monitor the system from their location.

The Security Dispatch Monitors are scheduled to work the following shifts:

- 8:00 a.m. – 4:00 p.m.
- 4:00 p.m. – 12:00 a.m.

In an effort to be cost effective, should a Security Dispatch Monitor call in ill or be on vacation the Facilities Management Dispatcher will monitor the security system from their office location. Should a Facilities Management Dispatcher be out sick or on vacation, the Security Dispatch Monitor performs their duties from the Facilities Dispatcher office and monitors the security system from that location.

Section 4: Police and Security Strategies

Various methods and strategies are used to address the problems of crime in the developments. These methods involve traditional policing practices, community policing strategies and also strategies that have been devised by the PHU officers to address problems. Any strategy used must have the approval of the police department and also the PHA to ensure that they are receptive to the residents of the developments, effective, and operate within the legal guidelines for law enforcement.

PHU and Security Patrol Methods

The PHU officers practice two methods of patrolling the family developments and high-rises. These methods are vehicle patrol and foot patrol. Mobile patrol is the norm due to the extensive area that has to be patrolled by the PHU. Foot patrol is utilized to access those areas not easily accessible by vehicle or viewed from a vehicle and also areas/developments with high activity. The PHU officers practice random patrolling throughout the PHA developments. If there is an identified problem in a development or area of a development, it is patrolled more frequently. Patrol hours vary and are dependent on the police department designated hours with the PHA extended hours of coverage attached. Historically the police department hours and the PHA hours have allowed for a minimum of 12 hours of coverage per day.

The PHA security officers conduct roving patrols in a PHA security vehicle on a 24-hour basis at each of the 6 PHA high-rises and also conduct foot patrols of each building during a shift; security officers also provide a stationary security post if needed.

Visual patrolling is also conducted by the Security Dispatch Monitors through the use of the 269 cameras located in all the High-Rises and family developments.

Strategies Used for Addressing Identified Problem Areas

There are four tactics that are used by the PHU in addressing problems and they are as follows:

- **Zero Tolerance:** The problem area is identified and an increase in police visibility is implemented. The strict enforcement of all laws, city ordinances and traffic regulations are utilized to convey the message to the people responsible for the problem that all infractions of the law, including minor infractions, will not be tolerated. Historically this type of operation will result in the problem being greatly reduced or completely eliminated.

- **Monitoring of a Problem Area:** After a problem has been reduced or resolved the officers continue monitoring the problem area to ensure that the problem does not return. Property Management and residents are informed that if they see the people responsible returning to the area to notify the police immediately so the situation can be quickly addressed before it becomes a major problem again.
- **Use of Outside Enforcement Agencies:** The assistance of the Narcotics Division and the Detective Division of the Providence Police Department are used in addressing situations that require the specialized services of these Divisions and other specialized units of the department. This assistance is needed in order to be effective against narcotics and such serious cases such as murder and other major crimes committed in the developments. The PHU also works closely with other outside law enforcement agencies such as the Rhode Island State Police, the FBI, ATF and the HUD Office of Inspector General. Periodically the PHU and the PHA will become involved in long-term crime suppression operations, especially pertaining to drugs, with these various agencies. Collaboration with outside entities has proven to be very effective in reducing crime in the past. Beginning in June 2021, PHA was approved for submitting fingerprints electronically to the FBI. Submitting fingerprints electronically for new hires and applicants for housing programs who have out of state records allows PHA to have results within 24 hours.
- **Collaboration with PHA Property Management:** It has been the practice that the information and reports on any person arrested in any of the developments and police and security reports are forwarded to Property Management for follow up action. Depending on the seriousness of the offense management will decide on what lease enforcement or other action is to follow. One practice is the issuance of a No Trespass Order when a non-resident is arrested in a PHA development, especially for a serious offense.

Security Strategies

The security strategies are very basic, yet effective. The security officers are assigned to patrol their designated high-rises and provided with information about security issues or concerns requiring attention. Security Officers are present 24 hours per day, 6 days per week. On Sundays during the day, the FM dispatcher and PHA rover cover all of the City from 8a.m. – 4:00 p.m.; Security guards are again present on Sundays from 4:00 p.m. to 8:00 am on Monday morning.

Should a situation arise that requires an increase in security coverage for a particular building, officers needed to address the situation security personnel will be assigned.

Section 5: Community Relations

The ability to maintain strong community relations is mostly determined by the attitudes of both the police and the residents. The primary mission of any police officer or department is the detection and suppression of crime and the identification and apprehension of criminals. The more the community assists and supports the police, by reporting crimes and assisting in identifying those engaged in criminal activity, the quicker most of the problems of crime in that community will be addressed and reduced. Trust is a major ingredient needed to establish a good solid relationship between the police and the community.

Relationship between the PHU Officers and the Residents

The PHU is basically a community policing-oriented unit. The officers that patrolled public housing in the early 1970s were in fact called Community Protection Officers. This evolved into the PPD Public Housing Unit officers.

The overall relationship between the PHU officers and the residents of the housing developments appears to be one of trust. There are several reasons this relationship exists. The primary reason is due to the length of time some of the PHU officers have been assigned to the PHA developments. Because they have spent so much time in one place, they have the ability to establish relationships with the residents. Historically the majority of officers that have been assigned to the PHU remain with the unit for an average of 5 years and some even longer. The primary reason for an officer to leave the unit is promotion within the police department. For instance, if a PHU officer takes the sergeants exam or the detective exam and successfully completes the process, that officer will be transferred from the unit upon promotion to that rank/specialty. Also, some of the officers have transferred from the PHU to other specialized units such as the narcotics division. It is actually a good thing that some of the PHU officers move on to other areas of the department. It allows for officers who are highly experienced in providing community policing services in public housing communities to spread that knowledge throughout the department as a whole and then to the area of the Department to which they are currently assigned.

The PHA Director of Security Operations is also a retired PPD officer and was assigned to the PPD Public Housing Unit for his last 13 years as a PPD Officer. The Associate Director of Security Operations resided in the Manton Heights housing development for 32 years. The Associate Director brings a valuable resident perspective to security and crime prevention and the Associate Director's long-standing relationships with tenants in the high-rises and developments foster trust between PHA residents and security operations staff.

The relationship between the community and the PHU officers becomes extremely important when incidents involving the police locally or nationally show law enforcement in an unfavorable light. The instances would normally place a strain on the general relationship between the police and the community. The PHU officers have never hesitated to explain or discuss controversial police actions with the residents and in effect engage in an exchange of views and opinions. Most of these exchanges are informal but are usually a learning experience for both the police and the residents. To assist in reinforcing the relationship between the PHU officers and the residents, especially the youth of the developments, the officers periodically organize hot-dog roasts during the summertime along with other youth-oriented events. At other times, during the Thanksgiving holiday season for instance, the officers distribute food baskets to the more needy families. The baskets are solely donated by the PHU officers. During the Christmas season the PHU officers also seek toy donations to distribute them to the children of the developments.



A PHU Sponsored Hot-Dog Roast In A Family Development

It should be noted that due to the relationship with the residents, many have voluntarily furnished information pertaining to criminal activity. This information has greatly assisted the officers in their effort to combat crime in the developments. The PHU has also established a reputation in the developments that the officers will go that "extra mile" to assist a resident in need of advice, help or any other type of assistance.

Providence Housing Authority, Public Housing Unit, and Providence Police Department Involvement in Community-Based Strategies in Policing



The Office of Security Operations and the Providence Police Department collaborate to provide the Youth Police Initiative or YPI. YPI is a community-based intervention program delivered by the National American Family Institute, intended to bring about positive changes in relationships between police departments and local at-risk youth. The program engages at-risk youth ages 13-18 with the police officers who patrol their neighborhoods in a four-week interactive training program that seeks to prevent gang

involvement, reduce crime, limit delinquency among city teens experiencing conflict, and build trusting relationship between residents and law enforcement. For youth, the program teaches conflict de-escalation skills, dispels negative stereotypes of law enforcement officers, and leaves youth with a greater understanding of the responsibilities and challenges faced by police officers. The program leaves officers with a greater understanding of youth and the challenges they face, and serves to dispel negative stereotypes of urban youth.

Since YPI introduction in 1999, the PHA has run numerous YPI trainings affecting numerous PHA youth and 70 police officers. This program's successful outcomes and wide-spread positive press was enabled by long-term, successful partnerships and aligned visions with various local and state policing agencies.



The YPI program led to NAFI's **Youth Leadership Academy (YLA)** designed as the more intense next step for YPI graduates that involved leadership, conflict resolution and civic engagement activities that will better prepare them for becoming positive role models and achieving their career goals and job readiness. This program has also exhibited major

successes and strides in our PHA youth community and police officer relationships.

Youth Programs such as the Youth Police Initiative and Youth Leadership Academy have proven to assist in cementing a good relationship between the officers and youth. The continuation of such programs requires funding so the PHA's Security Operations, Resident Services Department and Executive Office actively search for additional funding opportunities to continue/expand these vital programs within the PHA developments and Providence community. The PHA and PPD PHU have participated in numerous trainings over the past 5 years.

Relationship between PHA Staff and the Police/Security Personnel

The relationship between the officers of the PHU and the PHA staff is well established. Through the combined efforts of the PHU officers, and the PHA, the quality of life for the residents has substantially improved. A recent review of crime statistics for the City of Providence by the PHA revealed drastically lower rates of crime at PHA properties compared to the neighborhoods in which they are located. This was mostly attained through the constant exchange of information between the PHA and PHU, and the ability to address the problems together as a team. Over the years the PHU and its officers seem to have become accepted members of the PHA family.

Section 6: PHA Staff and Security Guard Training

The PHA has recognized that awareness is a key element in the detection and prevention of criminal activity. All staff members of the PHA, regardless of job assignment, are trained in the methods and tactics used to detect and prevent crime.

PHA Personal Safety and Security Training

Periodically employees of the PHA are provided with the PHA Personal Safety and Security Training. The goal of this training is to not only emphasize awareness of crime detection and prevention tactics, but to also define what crime actually is, its impact and the threats posed by the criminal element. This has evolved from a training the PHA previously developed in partnership with the Office of Healthy Aging when it was known as the Department of Elderly Affairs, and which the PHA conducted training on for other housing providers.

Department of Healthy Aging Security Guard Training Program

The PHA was the designated agency that provides training specifically addressing the needs of security officers that are assigned to patrol high-rises. The PHA produced a *Security Officer Manual* and a training program for all security agencies/officers assigned to PHA High-Rises. This training is an eight-hour course that continues to be used as the basic training for all PHA Security Officers.

The training topics discussed at these sessions addresses the following:

- Participating agencies
- Training concept
- DHA Rules and Regulations Governing Security for Housing for the Elderly
- Security procedures
- First aid

The Security Procedures section specifically addresses topics such as:

1. Security Regulations and Procedures

2. Techniques of patrol
3. Communications
4. Crime Prevention
5. Alarms
6. Bomb Threats
7. Emergency Procedures and Fire Control
8. Dealing With Difficult Situations & Crimes Against the Elderly
9. Laws and Evidence
10. Theft and Pilferage
11. Use of Public Areas
12. Doors, Hallways and Other Property
13. Monitoring
14. Safety Procedures
15. Report Writing
16. Uniform, Grooming and Appearance
17. Public Relations
18. General Sensitivity

The Rhode Island Office of Healthy Aging no longer requires the training as a security guard requirement, however, the PHA continues to train its security officers to this standard. In addition, all security staff participate in PHA Security Guard Training.

PHA Security Guard Training

The topics and sub-topics discussed during this training are as follows:

- Crime Detection and Prevention
 - Types of crime
 - Who profits from crime?
 - What crimes do you fear most?
 - How to prevent being a victim of crime
- Types of Weapons
 - Different types of weapons
 - Rhode Island weapons laws
 - PHA Weapons Policy
- Violence in the Workplace
 - Who may be at risk and why?
 - Intervention procedure
 - Post-Incident procedure
 - Entering apartments
 - Working on the grounds
 - Licenses
 - Vehicle safety
- Tactics and Tips to Assist in your Safety and Security
 - Principals of survival
 - Six major concerns of personal safety
 - Cover and concealment
- Planning Defensively
 - Security in the home
 - Security in the neighborhood and about
 - Security at work
 - Security measures when traveling locally

- Security measures when traveling long distance and abroad
- Terrorism
 - Definition of terrorism
 - Terrorist group categories
 - Types of terrorist attacks
 - Prevention measures
 - Evacuation or Basic Bug Out Bag
- Substance Use Disorders
 - Overdose prevention training and issuance of Narcan nasal spray
 - Behavioral Health
 - Mental Health First Aid and Trauma Informed Practices
 - De-Escalation Techniques

This training, presented with the use of a PowerPoint presentation and the use of various training aides, is conducted by the PHA Security Director, Associate Director or a PHA designee. The Security Director utilizes his police experience and training, along with his knowledge of the PHA and recent research and data trends, to keep this training as realistic and updated as possible. Additional training topics listed are provided by instructors from the PHA's Wellness Resource Center, including a licensed independent clinical social worker, a substance abuse specialist, and a VOCA Community Safety Coordinator.

Additional Training

Periodically, the PHA will offer trainings on relevant topics pertaining to current events or concerns. Examples of these training topics include Naloxone interventions and preventing opioid overdose, active shooter training, etc. The ability to offer these opportunities is budget dependent but allows the PHA to remain flexible in its provision of professional development to its staff and security team members.

Section 7: Resident Safety and Education

The PHA takes an active part in the safety, education, and training for the residents of all PHA developments. New residents at orientation are instructed in the different methods to report crime or suspicious activity (such as contacting PHU officers through the PHA's Office of Security Operations) and how to call the police for emergencies should they need police assistance.

Residents are instructed to contact the police in the following manner:

- In an extreme emergency dial 911
- The telephone number for the Providence Police is 272-1111
- After dialing 911, or the police department, and giving the necessary information the residents are instructed and encouraged to call the PHA Security Dispatcher at 421-6980
- If a tenant needs to speak with a PHU officer for advice, information or a non-emergency that can contact them at their office telephone number, also 421-6980.

Residents are especially encouraged to call the PHA Security Office to report suspicious activity and/or quality of life problems. The PHU officers will usually receive these non-priority calls in a more-timely fashion from the PHA dispatcher than from the police department dispatcher.

Moved from Policing Tactics Section

The PHA has a Resident Advisory Board (RAB) that meets monthly with the PHA, and its members assist the PHA in planning and guiding the agency's work. Members are elected by their respective communities and bring a resident perspective on planning and delivering a range of services, including security services. These monthly meetings provide a forum for resident representatives to bring forth any concerns impacting their community, including safety and security. Throughout the year, the Office of Security Operations makes formal presentations about security and safety at RAB meetings. These trainings are accompanied with handouts that RAB members can provide to the residents of the developments they represent. At times, police officers and other entities may join these meeting to provide a presentation or information. As an example, a representative of the Office of the RI Attorney General provided a training to the RAB about presenting oneself from fraud and financial exploitation in June of 2021.

The PHA looks forward to resuming monthly Tenant/Management meetings at each building when Covid restrictions ease. These monthly meetings, in which the Security Department is an active participant, provide a site-based opportunity for residents to make PHA aware of security concerns and for the PHA to provide update information about new security programs or measures and training about crime prevention. Over the years various agencies, such as the Office of the Rhode Island Attorney General, have given presentations to elders and persons with disabilities in the high-rises. These agencies provide this training when conditions exist in the community that put residents at risk of victimization by crime.

At the family sites the youth are given instruction on fire safety, which is presented by a representative of the Providence Fire Department.

In the high-rises, the PHA Safety Committee, Property Management (PM) and Strategy and Development Departments (OSD) organize and present security/safety presentations at each development annually. These presentations instruct the residents on individual security, building security and fire safety. It should be noted that PHA requires residents who have had a fire in their unit to participate in a PHA fire safety workshop.

Section 8: Goals, Objectives, and Performance Indicators

In 2020, PHA adopted a Five-Year Strategic Plan with four over-arching goals including: 1). Identify and Pursue Opportunities to Preserve and Expand Affordable Housing; 2) Provide Safe and Healthy Communities with Pathways to Vibrant Futures; 3) Cultivate, Enhance, and Evaluate Strategic Partnerships; and 4) Continuously Improve PHA Management and Operations. The Providence Housing Authority's Strategic Plan lists all the PHA strategies and actions assigned to each department. (A copy of the PHA Strategic Plan 2020 – 2025 can be viewed at the PHA's website at www.provhousing.org.) A key strategy under Goal 2 is to enhance security on PHA properties, with corresponding activities involving conducting comprehensive security assessments, researching best practices, and revising the security plan to reflect new and emerging trends in safety and security. The security section of the Strategic Plan incorporates the security departments' goals and objectives. The following topics are what the PHA and the security department considers the most important goals and objectives involved in providing security services.

Maintaining an Appropriate Level of Security

A primary goal of the PHA is to maintain an appropriate level of effective security in both the high-rises and the family developments.

In the **high-rises** 24 hours security services are provided by both the PHU officers and the security staff. The PHU officers are responsible for responding to calls for service from the high-rises. The PHA Security Officers are assigned to patrol the high-rises. The Security Dispatch Monitors also keep the building under camera surveillance 24 hours per day.

The **family developments** are patrolled by the PHU officers, on average 12 hours per day. The officers are assigned to patrol the hours that have been identified as having the most problems. It has been recognized by the PHA and the police department that police visibility is a key element in both resolving issues of crime and prevention of crime

Timely Information Referred to Decision Makers.

There is a strong partnership between the PHU officers, the security and other PHA staff, especially Property Management Department staff. The information contained in the police and security daily reports are placed in a database and a weekly report of all police and security activity is produced and sent, via e-mail, to appropriate PHA staff. The weekly reports serve to alert staff about problems, or potential problems, which exist in their developments. These staff members can then decide what action to take to assist the police and security in finding a resolution to the problem. If a serious incident takes place, all of the information pertaining to that incident is immediately delivered to the appropriate staff member so that that the particular problem can be addressed without delay.

The Security Director and Associate Director attend monthly senior staff meetings where there is an opportunity involving all departments to discuss challenges. The Security Director and Associate Director are in constant contact with the Executive Director, other Directors and Associate Directors and other PHA staff in an effort to address an identified or potential problem while that problem is still manageable.

Image of PHU and Security

The police officers of the PHU practice a form of policing that utilizes both conventional and traditional policing tactics and community policing tactics. This form of policing has been successful and appears to have satisfactorily addressed both the needs of the staff and the residents of the developments. Since many of the PHU officers have served in the unit for a lengthy period of time, they are thoroughly familiar with the residents and in most cases with those residents with particular problems or needs. The image that the PHU strives to promote is that the officers are approachable and that they will take that extra step to address a problem. The goal is to address the problem of crime successfully, but by not being invasive when dealing with law-abiding residents. For instance, when a development is experiencing a problem the PHU officers have the ability to move into that area and address the problem swiftly due to their ability to focus on the problem causers. This is due to the fact that the officers have relationships with residents and have a familiarity with persons who live in a development and those who do not, allowing them to focus on persons responsible for actions negatively affecting the community.

Realistically, it is the day-to-day contacts that promote the image of the PHU officers. Accessibility to the officers and their positive and courteous demeanor and attitude when dealing with the public is the key ingredient in promoting a positive image.

Participation in both the YPI and YLA Programs assist with the relationship between the PHU, police district officers and the resident youth.

Crime Prevention Information

The most effective means to prevent crime, or reduce the incidents of crime, is to assist the staff and residents in recognizing problems or potential problems and to ensure that they have the ability to report their suspicions and take actions to protect themselves. The PHA staff has been trained in recognizing crime and criminal activity through their attendance of the *PHA Personal Safety and Security Training* session. The security officers receive the same level of training during the Department of Healthy Aging mandated training which the PHA sponsors.

The residents are given crime prevention information during new resident orientation and in Resident-Management Community meetings. Additionally, PHA disseminates crime prevention and security alert brochures and mass messages to alert them to any security or safety issues that may impact them. The police officers of the PHU visit all developments regularly and alert the residents to problems taking place in the area with information mostly distributed on a one-on-one informal basis and periodically at a formal meeting. The security staff that are assigned to the high-rises are alerted to any problems that are occurring in their assigned buildings and they alert the residents to the problem accordingly. Management and Facilities Management staff are alerted to any serious problems occurring in their developments. If residents have a particular security related concern, the Office of Security Operations Director, Associate Director and/or a PHU officer will attend the Resident-Management Managers meeting to discuss the problem or, if it a serious concern, a security meeting with the residents will be conducted.

Performance Indicators

The Security Department has established 20 key performance indicators addressing and monitoring the performance of General Administration, Manpower/Patrol, Crime/Activity Analysis, Resident Background Screening, PHA Security Officers, Security Dispatch Monitors and Public Affairs.

The key performance indicators for **Security Operations General Administration** insures the following:

- Standard Operating Procedures Manual is up to date
- Monthly Management and Annual Reports are completed
- Weekly Duty Schedules are prepared

Key performance indicators for Security Operations **Manpower/Patrol** attempts to achieve:

- A minimum of 12 hours per day of PHU policing coverage
- Tracks the total crimes reported to the PHU
- Tracks arrests made for both Part 1 and 2 offenses
- Number of Radio Calls responded to
- Compares PHA crime rates to those of surrounding neighborhoods

The only performance indicator for Crime/Activity Analysis pertains to conducting a security analysis of all PHA properties. Resident Background Screening also has only one key performance indicator that being percentage of prospective residents screened for

criminal background (100%). The key indicators for the PHA Security Officers address the number of elderly-disabled high-rises with roving and foot patrols each day. The Security Dispatch Monitor key indicators pertain to the average coverage hours per week and the time taken to forward security violations and police reports to property managers for action. Public Affairs has only one key indicator that being the percentage of PHA resident-management meetings at which a PHU officer is present to participate.

The above represents the key performance indicators only. There are more indicators that are monitored to insure the smooth and effective operation of the Security Department.

Section 9: Funding Development

HUD's Public Housing Program and other supporting funding sources, such as the RI Office of Healthy Aging Housing Security Grant and HUD grants, which sustain and augment the PHA's Security Operations Office staffing, activities and equipment can be unpredictable. In addition, the reduction in local police department resources and budgets can be problematic to PHA's Public Housing Unit resources. The importance of providing safety to the PHA residents and the surrounding community as well as the unpredictable financial environment necessitates the Office of Security Operations to seek out new funding opportunities. In order to successfully position this office to increase funding prospects, the staff will:

- Security Department senior staff and staff of the Office of Strategy & Development monitor federal, state, municipal, and foundation funding opportunity announcements regularly in order to be abreast of additional funding sources for security measures
- Continue to meet regularly with the PPD and other outside anti-crime agencies to discuss possible grants, programs, or funding opportunities
- Continue to coordinate and collaborate with relevant PHA department/offices in order to research available programs or grant notices of funding relevant to safety/security
- Identify when the PHA's non-profit organization may be utilized as a fiscal conduit for grants available to non-profit organizations
- Seek new partnerships that may enhance the service to the Providence community
- Continue to track and monitor security and crime data in order to establish records that are required and enrich funding/grant applications

Section 10: Reporting, Data-basing of Information and Analysis

The collection of police/security data is compiled in several ways. Data are collected and reported by daily, weekly, monthly, fiscal and calendar year reports.

The specific reports are:

Daily Activity Report (DAR)

The PHU reports on their daily activity in the Daily Activity Report. All activity generated by the officers such as arrests, dispersals, types and locations of radio calls and the originating dispatcher (PPD or PHA) are entered in this report. The Daily Activity Report is an important report because additional reports are generated from the data included in the DAR. All arrests entered in the activity report are entered in the PHU Arrest Database

on a daily basis and all activity entered that occurs in the PHA developments are entered in the PHA Police Activity Database on a daily basis.

The PHA Security Officers also submit a daily report which is entered into the PHA Police Activity Database. Information entered on these reports that require immediate action by PHA staff is immediately forwarded to that staff via e-mail.

Weekly Activity Report (WAR)

At the end of each week the Security Director, Associate Director or a member of the staff gathers the information in the PHA Police Activity Database to complete a weekly report. The report is generated using an Access program and then forwarded via e-mail to the PHA Executive Director, Director and Associate Director of Property Management, Director and Associate Director of Facilities Management, other PHA Directors, all PHA site managers and other select staff. Those in receipt of these reports possess information on all police/security activity and problems from the previous week. After reviewing these weekly reports, managers can determine if and when further action on their part is required.

Monthly Management Report

The Monthly Management Report (MMR) is divided into nine separate reporting forms. **(See Appendix A)**

The first page of the MMR contains the activity summary for the month, which includes the arrests made, the offenses reported and the number of those apprehended for those offenses. This first summary page also lists the major incidents that occurred, and the numbers of vehicles tagged or towed by the police or security staff.

The second page contains the PHU Monthly Part 1 and Part 2 Crimes Cleared by Arrest. This report also contains the monthly PPD and PHA radio call information, motor vehicle summons/tags issued, dispersals, lease violations, meetings attended and eviction hearings. This data is broken down by individual development.

The third page of the MMR contains the PHU FY Year-to-Date information for all issues contained in the monthly report.

Page four of the MMR contains the PHU Monthly Crime and Incident Report. This report contains all of the Part-1 and Part-2 crimes reported to the PHU for that month.

Page five of the MMR contains the PHU FY Year-to-Date Crime and Incident Report. This report contains all of the Part-1 and Part-2 crimes reported to the PHU for that current fiscal year.

The sixth page of the MMR is the Monthly Security Work Order Report. This report contains all of the calls addressed by the Security Monitor Dispatchers. These calls are broken down by development and into the following codes:

- **Code 1:** The number of responses by the fire department to fires, fire alarms or medical emergencies
- **Code 2:** Violations of the building's security regulations, such as exiting an emergency door, or leaving an apartment door open. Usually detected and reported by PHA security guards or Security Dispatch Monitors observing or reviewing security cameras.

- **Code 3:** An act or incident requiring the presence of a uniformed Providence Police officer that is not entered on the PHU Daily Activity Report. Usually, a call monitored on a scanner by the PHA Security Dispatch Monitor or called into the PPD by the monitor when the PHU officers are off duty.
- **Code 4:** An act or incident, such as a minor disturbance between residents that the PHA Security Officer can resolve without the police. Also includes security or safety concerns/issues reported to the security guards.

Page seven of the MMR contains the Monthly Fraud Investigation Report, the Monthly BCI Checks report, the BCI Checks Year-to-Date Report and VOCA referrals and Year to Date referrals. Those individual reports track the following:

- **Monthly Fraud Investigations Report:** Tracks any and all fraud investigations conducted by the PHU or security personnel during that month.
- **Monthly BCI Checks:** Records the BCI checks conducted during the month. The BCI checks are tracked by employee checks, housing applicant checks, and also contains the number of applicants fingerprinted who need a more extensive criminal background check with the FBI.
- **BCI Checks, Year to-Date:** Records the fiscal year-to-date number of criminal background checks and those who needed being fingerprinted.
- **VOCA-Victims of Crime Advocate, Monthly and Year to Date:** Records the referrals done to the VOCA from PPD responses and reports and security incident responses.

Page eight of the MMR contains the Monthly Access Cards Issued report and the Access Cards Issued Year-to-Date. The Monthly Card Access Report contains the number of access cards produced and distributed to employees and residents for the month, while the Access Cards Issued Year-to-Date report contains the number of cards produced and distributed to employees and residents during the current fiscal year.

Fiscal Year Report

The Fiscal Year Report is the PHA's yearly report beginning July 1 and ending on June 30. The Fiscal Report incorporates reports from all PHA departments with the Office of Security Operations having its own section. The Security Section of the fiscal report contains the MMR totals for the fiscal year. This report also contains a narrative that outlines the status of the following:

- Status of the PHU and security personnel
- Equipment
- PHU activity (arrests and other) for that period which is generated from the MMR information
- Identification of primary problems
- Actions taken to address/resolve the problems
- Analysis of statistical information

Calendar Year Report

A Calendar Year Report is a summary report prepared for the Providence Police Department that contains the calendar year activity information for the PHU. This report is prepared for the police department due to the fact that their fiscal year covers the

period from January 1 to December 31. This report contains the identical statistical information as in the PHA Fiscal Year Report however covering the calendar year period.

Through the use of these reports the PHA and the PHU can readily identify the most problematic areas or developments and the types of crime occurring at these locations. Once it is indicated that a problem exists in a particular development, the PHU and the PHA can devise a plan of action to address/resolve the problem. The type of action taken is dictated by the specific types of problems or crimes being committed that have been identified. For instance, an increase in a narcotics problem in a particular development, and an increase in the crimes associated with the drug problem, would indicate the type of action to be taken by the police to address the problem, such as a “Zero Tolerance” operation (see table below).

Report Distribution Table

Type of Report	Frequency	Executive Director	Managers	PPD	Security Directors	Public
Daily Activity Report	Daily	Yes		Yes	Yes	
Weekly Activity Report	Weekly	Yes	Yes		Yes	
Monthly Managers Report	Monthly	Yes	Yes	Yes		
Fiscal Year Report	Annually	Yes	Yes	Yes	Yes	Yes
Calendar Year Report	Annually	Yes		Yes	Yes	

Section 11: Supporting Manuals and Reports

The PHA and the Security Operations Office have several manuals and reports related to security and emergency operations. These reports and manuals address operational procedures, emergency procedures and statistical information and analysis. These supporting manuals and reports are as follows:

PHU & Security Office Operations Manual

The PHU & Security Office Operations Manual defines the daily, weekly, monthly, and annual duty and reporting requirements for this department. This manual also lists all of the computers located in the office and a description of their use. Databases are defined along with the information management protocol. The sections of this manual are as follows:

- Section 1: Daily Duties and Reports
- Section 2: Weekly Duties and Reports
- Section 3: Monthly Duties and Reports
- Section 4: Quarterly Duties and Reports
- Section 5: Fiscal Year and Calendar year Duties and Reports

- Section 6: Office Computers
- Section 7: Databases
- Section 8: Information Management
- Appendix: To include Staff Primary Duties, Primary Daily, Weekly, Monthly & Annual Duties and Responsibilities and Security Monthly Management Forms

This manual provides a guide for all office personnel to follow in order to ensure that all duties and responsibilities, especially administrative, are successfully completed. This manual also serves as a guide for the department should key personnel be absent during the times when key reports are due or primary duties to be performed.

Security Dispatch Monitor Operating Procedures Manual

The Security Dispatch Monitor Operating Procedures Manual specifically addresses the duties and responsibilities of the Security Dispatch Monitor/dispatcher staff. This manual is divided into the following sections:

- Section 1: Primary Duties and Responsibilities of PHA Security Dispatch Monitors
- Section 2: Security System Defined
- Section 3: Starting and Launching (the system)
- Section 4: Door/Siren Control
- Section 5: Remote View
- Section 6: Reports Suites
- Section 7: PHA Security Dispatch Monitor Operating Procedures
- Section 8: Emergency Contact Personnel and Numbers
- Section 9: First Line Remote View
- Appendix 1: Quick Action Reference Guide
- Appendix 2: PHA/PHU Police/Security Radio Call List
- Appendix 3: Emergency Contact Telephone Numbers
- Appendix 4: Labeling of Captured Video
- Appendix 5: Security Dispatch Monitor Shift Responsibilities

This manual allows for a quick reference guide for the Security Dispatch Monitors and also the Facilities Management dispatchers as a refresher or quick reference guide.

Emergency Operations Manual

The Emergency Operations Manual serves as a guide for all PHA staff and employees in the event of a severe weather-related incident, natural disaster, man made disaster or a serious crime related incident. This manual includes historical information and probability and vulnerability analysis to determine the probable events that the PHA may encounter and should prepare for. The Emergency Operations Manual establishes procedures for dealing with the following events:

- Hurricane
- Tornado
- Blizzard or Severe Winter Storm
- Severe Thunderstorm
- Earthquake
- Extreme Heat Wave
- Extreme Cold Weather
- Hazardous Materials Incidents
- Natural Gas Leak
- Water Main Break

- Extended Power Outage
- Fire
- Explosion
- Structural Failure
- Bomb Threat
- Civil Disorder
- Hostage Situation
- Workplace Violence

The Appendix of this manual contains the following information:

- Evacuation Procedure
- Pre-Storm Check List
- Sit Rep Radio Log
- Site Crew Sheet
- Damage report Radio Log
- Damage Assessment Report
- Bomb Threat Report
- The Salvation Army/Providence Canteen Truck's General Operations Plan
- Emergency Telephone Numbers
- Resident Notices
- Development Site Maps
- Aerial Photos
- Evacuation Floor Plans

This manual provides a guide for all PHA personnel to address an event before it occurs, during the event and after the event. This manual is very well thought out and is periodically revised should any procedure be subject to change due to input from emergency response organizations.

Annual Reports

The PHA Annual Report is based on the fiscal year which covers the period beginning July 1 and ending on June 30th. This annual report contains statistical information and analysis for the period along with information pertaining to the staffing of the police and security unit and the equipment. All Part-1 and Part-2 Arrests and Offenses Reported are totaled for the year and then an analysis is conducted to determine information such as the most active months and the most common types of crimes encountered. Security Work Orders are tabulated and reviewed to determine the most active developments. In addition, the total number of BCI checks, persons finger-printed and access cards produced for this period is contained in this report.

The annual report information is utilized to determine trends in criminal activity not for just a particular year but for an extended period of time. This information and analysis assist in determining the deployment of both police and security personnel to effectively address the problems.

Section 12: COVID-19 Response

Security Personnel:

- The PHA's Security Department Director and Associate Director work in close collaboration with all PHA Departments and the PHA's Covid Hotline to monitor

the status of the pandemic and its impact on PHA residents, enforce safety protocols, and provides services in a Covid-safe manner.

- All staff have received training concerning PHA's Covid safety protocols.
- PHA security guards are continuing to have roving patrols on the 3 shifts, 8am-4pm, 4pm-12am and 12am-8am. They are responsible for roving the 6 High-Rises and checking lobbies, exterior of the buildings, parking lots and then going to next High-Rise. They also respond to security calls. If needed they will provide a stationary post at the High-Rises.
- PHA guards are continuing to assist in the COVID-19 testing and vaccinations in the High-Rises and family developments.
- PHA guards continue to remind tenants and guests about mask wearing requirements in the buildings and no loitering/social distancing in the common and lobby areas.
- PHA guards continue to hand out face masks to tenants who do not have one in the lobby area.
- Guards provide reports to Property Management concerning residents/guests who are not in compliance with Covid-safety requirements.

Monitoring PPD & Fire incidents for PH and S8 addresses:

- The Office of Security Operations continues to monitor the PPD and PFD radio systems and checking the PPD and PFD reporting systems. The Overnight PHA rover and FM dispatch have PPD and PFD scanners.

Coordinating with PPD, PFD, VOCA, RSD, Property Management and PHA staff to address and monitor safety and behavior:

- The Office of Security Operations and PPD PHU meets daily for any issues regarding the COVID-19 or issues at the PHA developments and High-Rises.
- The Office of Security Operations emails and contacts Directors daily with possible COVID-19 responses by PPD or PFD. Directors then update their staff for follow-ups.
- The Office of Security Operations continues to work with OSD in researching the databases, report systems and reviewing security video for complaints or issues from BOC, RAB and tenants. OSD are asking residents that the PHA be notified of complaints in a timely manner. Security is in contact frequently with OSD to address these complaints or issues.
- The Office of Security Operations continues to contact the PHA's Wellness Resource Center, especially the VOCA Community Safety Coordinators for cases where PPD or Security have responded for domestic violence-related calls or for calls where an intervention may be needed, such as overdose incidents.
- The Office of Security Operations works in direct collaboration with the Property Management Office to address problematic tenant or guest behavior and develop safety and security strategies.

Tracking activity:

- Daily activity of PHU, PPD, PFD and PHA Security is continuously databased and sent daily to Directors.
- Office of Security Operations reviews PHA security guard reports and is in frequent contact with PHA management.

Section 13: Supporting Victims of Crime

In 2019, PHA was awarded a Victims of Crime Act grant from the RI Department of Public Safety to support the position of Community Safety Coordinator (CSC); subsequent grants have continued to support this position and the addition of another CSC in 2021. The CSCs works closely with the Security Department to identify and outreach to victims of crime and link them to programs that aid in the recovery from the experience of victimization by crime. The CSCs are employees of the Resident Service Department and are members of the PHA's Wellness Resource Center (WRC). The CSCs work in collaboration with other disciplines at the WRC, including the Substance Abuse Specialist, Licensed Clinical Social Worker, and Community Health Outreach Worker.

Section 14: Summary

As the information in this Security Plan indicates, police and security operations conducted in the PHA developments are quite extensive and have proven to be successful. The security of the PHA's developments is achieved through the combined efforts of the police officers assigned to the PHA, PHA security staff, other PHA staff and the residents of the developments. Many of the strategies used to address and reduce the problem of crime in the developments have proven to not only be successful, but also acceptable by the residents themselves.

It is the goal of the PHA to continue to provide an appropriate level of security and police services to the residents of the developments. The success or failure of that goal in the future will be dependent on the motivation of the police and security staff, federal funding for personnel and the equipment needed and the continued personnel and other assistance provided by the Providence Police Department.

Appendices

Appendix 1: Security Monthly Management Report

Security Section MMR Page 1 Summary

Office of Security Operations

SUMMARY

For the month of December 2020, the Public Housing Unit apprehended a total of 1 individual for a total of 10 criminal offenses. In addition, the officers effected 2 dispersals, 2 summons issued, and attended 33 meetings. The officers of the unit also responded to 90 Providence Police Department radio calls and 8 PHA dispatcher radio calls.

Of the 1 individual apprehended by the PHU officers, 1 individual was apprehended in PHA development for a total of 13 criminal offenses that occurred in the development. Of the 2 dispersals, (2) both were effected in the PHA developments and there was 2 summons issued in the developments. Of the 80 police department radio calls, 37 were for incidents in the PHA developments. Of the 8 PHA radio calls, 8 were for incidents in the PHA developments.

MONTHLY ARREST SUMMARY

Location	Number of Offenses Reported	Number of Offenses Cleared by Arrest	Number of Individuals Apprehended
PHA Family Developments	13	10	1
PHA Elderly/Disabled High-Rises	1		
Subtotal	14	10	1
Other HUD Locations			
Other City Locations			
Subtotal	0	0	0
Total for the Month	14	10	1

The most serious incidents or activity in the housing developments for this month were as follows:

Also, in the month of December 2020, 33 vehicles were towed from PHA developments and 15 were tagged.

- On 12/10/2020, a Hartford Park tenant was charged with 1 Count of Possession of MDMA (Ecstasy) with Intent to Deliver and 1 Count of Possession of Marijuana with Intent to Deliver after a drug investigation. The information was forwarded to HP management.
- On 12/13/2020, a Section 8 tenant was shot in the back during a house party at her house. There was a problem with some males that came to the party and they were asked to leave. 20 shots were fired. She was released from the hospital and PPD Detectives have been in touch with her. The information was forwarded to S8 management.
- On 12/15/2020, a Chad Brown tenant was charged with 1 Count of Shoplifting after she was arrested with \$444.14 of stolen merchandise from Walmart. The information was forwarded to CB management.
- On 12/23/2020, a non-tenant was arrested at his sisters apartment at 335 Hartford Ave and charged with 1 Count Of Domestic-Simple Assault, 1 Count of Obstructing Police and 8 active Superior Court warrants. The victim was also a non-tenant.

Security Section MMR Page 2 Part 1 & 2 Crimes Cleared By Arrest (Month)

Section • Office of Security Operations

PHU MONTHLY PART 1 AND 2 CRIMES CLEARED BY ARREST

Incident	Hartford Park	335 Hartford	Manton Heights	Chad Brown	Roger Williams	Coddling Court	Decker Manor	Parenti Villa	Kilmartin Plaza	Dominic a Manor	Carroll Towers	Scattered Sites	Subtotal	Other HUD	Other	Total
PART 1 CRIMES																
Murder																
Rape																
Robbery																
Assault																
B&E																
Larceny																
Motor V. Theft																
Subtotal																
PART 2 CRIMES																
Simple Assault													1			1
Stolen Property	1															
Malevolent Mischief																
Weapons Off																
Prostitution/Vice																
Other Sex offenses																
Narcotics																
Gambling																
Family & Children																
DUI																
Liquor Violations																
Disorderly Conduct													9			9
All Other Offenses																
Subtotal	9												9			9
Total	10												10			10
Radio Calls PPD	15	3	4	7	2	1	5						37	40	13	90
Radio Calls PHA	3		1	1					2	1			8			8
M/V Summons/Tags				2									2			2
Dispersals	2												2			2
License Violations																
Meetings		30											30			30
Eviction Hearings																
Total	20	33	5	10	2	1	5		2	1			79	40	13	132

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Security Section MMR Page 3 Part 1 & 2 Crimes Cleared By Arrest (Fiscal YTD)

Providence Housing Authority Monthly Management Report

PHU FY 2021 YEAR TO DATE PART 1 & 2 CRIMES CLEARED BY ARREST

Incident	Hartford Park	335 Hartford	Manton Heights	Chad Brown	Roger Williams	Coddling Court	Decker Manor	Parenti Villa	Kilmartin Plaza	Dominic a Manor	Carroll Towers	Scattered Sites	Subtotal	Other HUD	Other	Total
PART 1 CRIMES																
Murder																
Rape																
Robbery																
Assault																
B&E																
Larceny																
Motor V. Theft																
Subtotal																
PART 2 CRIMES																
Simple Assault	4												4	4		8
Stolen Property																
Malevolent Mischief					1									1		1
Weapons Off	1												2			2
Prostitution/Vice																
Other Sex offenses																
Narcotics	6												6			6
Gambling																
Family & Children																
DUI																
Liquor Violations																
Disorderly Conduct														1		1
All Other Offenses	9												9	2		11
Subtotal	20					1							21	8		29
Total	20					1							21	8		29
Radio Calls PPD	126	24	45	76	8	13	27	12	2	2	4	1	342	201	80	623
Radio Calls PHA	9	6	5	13	1	1	7	5	5	2	1	1	56			56
M/V Summons/Tags	4			3									7			7
Dispersals	8				1								9	4		13
License Violations																
Meetings		181				1							182	1		183
Eviction Hearings				1									1			1
Total	147	211	50	95	10	15	34	17	7	4	5	1	597	206	80	883

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Security Section MMR Page 4 Crime and Incident Report (Month)

PHU MONTHLY PART 1 AND 2 CRIMES CLEARED BY ARREST

Incident	Harford Park	335 Harford	Manon Heights	Chad Brown	Roger Williams	Coddling Court	Dexter Manor	Parrelli Villa	Kilmarlin Plaza	Dominic a Manor	Carroll Towers	Scarfere d Sites	Subtotal	Other HUD	Other	Total
PART 1 CRIMES																
Murder																
Rape																
Robbery																
Assault																
B&E																
Larceny																
Motor V. Theft																
Subtotal																
PART 2 CRIMES																
Simple Assault	1												1			1
Stolen Property																
Malicious Mischief																
Weapons Off																
Prostitution/Vice																
Other Sex offenses																
Narcotics																
Gambling																
Family & Children																
DUI																
Liquor Violations																
Disorderly Conduct																
All Other Offenses	9												9			9
Subtotal	10												10			10
Total	10												10			10
Radio Calls PPD	15	3	4	7	2	1	5						37	40	13	90
Radio Calls PHA	3		1	1					2	1			8			8
M/V Summons/Tags				2									2			2
Dispersals	2												2			2
Lease Violations																
Meetings		30											30			30
Eviction Hearings																
Total	20	33	5	10	2	1	5		2	1			79	40	13	132

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Security Section MMR Page 5 Crime and Incident Report (Fiscal YTD)

Providence Housing Authority Monthly Management Report

PHU FY 2021 YEAR TO DATE CRIME AND INCIDENT REPORT

Incident	Harford Park	335 Harford	Manon Heights	Chad Brown	Roger Williams	Coddling Court	Dexter Manor	Parrelli Villa	Kilmarlin Plaza	Dominic a Manor	Carroll Towers	Scarfere d Sites	Subtotal	Other HUD	Other	Total
PART 1 CRIMES																
Murder								1					1	1		2
Rape																
Robbery																
Assault	1		1					1					3	2		5
B&E																
Larceny			1				1						2			2
Motor V. Theft			1										1			1
Subtotal	1		1	2			1	2					7	3		10
Simple Assault	4		1				1						6	6		12
Stolen Property		2											2			2
Malicious Mischief			3	1									4			4
Weapons Off	4		3	1									8	1		9
Prostitution/Vice																
Other Sex offenses																
Narcotics																
Gambling	6												6			6
Family & Children																
DUI																
Liquor Violations																
Disorderly Conduct				2			1						3	1		4
All Other Offenses	11		1							1			13	3		16
Subtotal	25	2	1	7	4		2	2		1			42	11		53
Total	20	2	2	9	4		3	2		1			49	14		63

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Security Section MMR Page 6 Security Work Order Report

Providence Housing Authority Monthly Management Report

MONTHLY SECURITY WORK ORDER REPORT

Development	Code #1 (Fire/Rescue)	Code #2 (Building)	Code #3 (Criminal)	Code #4 (Civil)	Total Security W/O	Percent	Year-to-Date Total
FAMILY DEVELOPMENTS							
Chad / Ad / Sun	19	8	27		54	16%	309
Roger Williams		1	2		3	1%	24
Coddling Court	4		5	1	10	3%	67
Hartford Park	19	10	20	2	51	15%	352
Manton Heights	13	2	18	3	36	11%	226
Scattered Sites	13		20		33	10%	304
Subtotal	68	21	92	6	187	56%	1282
ELDERLY / DISABLED DEVELOPMENTS							
335 Hartford Tower	4		1	4	9	2%	94
Dexter Manor I - II	11	2	2	31	46	14%	288
Dominica Manor	15		1	10	26	8%	133
Carroll Tower	15	1	3	6	25	7%	105
Kilmartin Plaza	3	3	1	7	14	4%	82
Parenti Villa	12		8	7	27	9%	175
Subtotal	60	6	16	65	147	44%	877
Total	128	27	108	71	334	21%	2159
Percent	38%	9%	32%	21%		100%	
Year to Date	778	191	744	446			2159

Code Definitions

CODE #1

The number of responses by the fire department to fires, fire alarms or medical emergencies.

CODE #3

An act or incident requiring the presence of a uniformed Providence Police Officer not entered on the PHU Daily Activity Report. Usually a call monitored on a scanner by the PHA Security Monitor or called into the PPD by the Monitor when the PHU officers are off-duty.

CODE #2

Violations of the building's security regulations, such as exiting an emergency door, or leaving an apartment door open. Usually detected and reported by PHA security guards or the Security Monitors.

CODE #4

An act or incident, such as a minor disturbance between residents that the PHA Security Officer can resolve without the police. Also includes security or safety concerns/issues reported by the security guards.

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Security Section MMR Page 7 Fraud Investigation Report & BCI Checks

Section • Office of Security Operations

MONTHLY FRAUD INVESTIGATION REPORT

Development	Investigations Received	Investigations Cleared	Investigations Determined Unfounded	Previously Outstanding Investigations Cleared	Investigations Referred for Follow-up	Total Cleared	Total Active
FAMILY DEVELOPMENTS							
Hartford	1	1				1	
Manton							
Chad Brown							
Roger Williams							
Coddling Court							
Scattered Sites							
Sub-Total	1	1				1	
ELDERLY / DISABLED DEVELOPMENTS							
335 Hartford Tower							
Dexter 1 & 2							
Dominica Manor							
Carroll Tower							
Kilmartin Plaza							
Parenti Villa							
Subtotal							
Section-3	0	0				0	
MONTHLY Total	1	1				1	
Year-To-Date Total	38	38				38	N/A

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Security Section MMR Page 8 Access Cards Issued Report

Providence Housing Authority Monthly Management Report

MONTHLY BCI CHECKS

Number New Employee BCI Checks	Number New Housing Applicant Checks	Total BCI Check Requests Received	Total Completed	Total Applicants Fingerprinted This Month
5	82	87	87	3

* IN ADDITION, NCIC WARRANT CHECKS WERE CONDUCTED. TOTAL OF FOR FY 2020*

BCI CHECKS YEAR-TO-DATE

Number New Employee BCI Checks	Number New Housing Applicant Checks	Total BCI Check Requests Received	Total Completed	Total Applicants Fingerprinted (YTD)
29	453	482	482	5

MONTHLY ACCESS CARDS ISSUED

Number Access Cards Issued to Employees	Number Access Cards Issued To Tenants	Total Access Cards Issued This Month
13	38	51

ACCESS CARDS ISSUED YEAR TO DATE

Number Access Cards Issued to Employees	Number Access Cards Issued To Tenants	Total Access Cards Issued Year to Date
102	247	349

VOCA

PHA/Security Referral	PPD Officer Referral	Other Referral
33	33	

VOCA FY YEAR TO DATE

PHA/Security Referral	PPD Officer Referral	Other Referral
150	150	

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Appendix 2: Primary Daily, Weekly, Monthly & Annual Duties & Responsibilities

Time Frame	Staff	Task
Daily	PHU Officers	Patrol all assigned developments
Daily	PHU Officers	Submit a Daily Activity Report
Daily	Security Guards	Patrol all assigned high-rises
Daily	Security Guards	Submit an Activity Report
Daily	Monitors & Directors	Record Activity Info into databases
Daily	Directors	Review activity sheets and update monthly tally sheets
Daily	Monitors	E-Mail information of a serious nature to involved staff
Daily	Monitors	Conduct Preliminary Criminal Background Checks
Daily	Monitors	Produce Access Cards
Daily	Monitors	Search PPD Computer and print related reports
Daily	Monitors	Fax Police Reports to PHA and other management
Daily	Monitors	Office cleaning/upkeep as required
Monday	Directors & Monitors	Produce Weekly Activity Report & E-Mail to select PHA Staff
Monday	Directors	Adjust staff time sheets and report changes to Finance
Monday	Directors	PHU and Security Time Reports to Ex. Dir. & Finance
Monday	Directors	Print current week time sheets and distribute

Wednesday	Directors	Fingerprint applicants for thorough Criminal Background Ck
Thursday	Directors	Produce, print, and distribute schedules to security staff
Friday	Directors	Compile and submit time sheets to Finance
2 x Monthly	Monitors	Complete Security Systems check
Monthly	Monitors	Database search to identify problems
Monthly	Directors	Complete and submit Security Section MMR
Quarterly	Directors	Update Goals management Plan
Annually	Directors	Complete Fiscal Year Annual Report
Annually	Directors	Complete Calendar Year Report (If Required)

Appendix 3: Staff Primary Duty Descriptions

Staff	Primary Duty
Public Housing Unit Officers	Provide policing services for the PHA and other public housing developments located in the City. Specifically assigned by the PPD to the PHA
Security Dispatch Monitors	Monitoring of the PHA security system, conducting criminal background checks, processing access cards, maintaining and up-keeping of the security office and equipment, administration duties as assigned and maintaining and updating all informational databases on a daily basis. Refer calls for service to police/fire departments. Provide replacements for a vacant Facilities Management dispatch shift
Security Guards	Patrolling and securing of the PHA elderly/disabled high-rises
Security Department Director and Associate Director	Supervision of security personnel and overseeing of police operations. Producing reports (weekly, monthly & annual) as required and performing all other administrative duties. Fingerprinting of tenant applicants when required.
Fraud Investigator	Investigating Fraud complaints
Nighttime Security Supervisor	Former senior member of the PHU team that works directly for the PHA providing nighttime coverage of the security monitors, training, and staff guidance. He is also the liaison between the PHU "Officer in Charge" and the PHA Security Director.

Attachment B.1(c)(1)



11.12 The PHA's Deconcentration Policy

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

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

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

11.13 Deconcentration Incentives

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

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

11.14 Targeting

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

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

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