



July 1, 2024 - June 30, 2025

Draft CAPER

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

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Executive Summary

In accordance with federal regulations, the City of Toledo (COT), Department of Housing and Community Development (DHCD), has prepared this Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER summarizes the city's progress in carrying out its housing and community development strategies, projects, and activities, as outlined in the 2020-2024 Consolidated Plan and Annual Action Plan.

The funding received was allocated primarily to two of the three HUD National Objectives:

- **Benefit low- and moderate-income individuals (LMI); and/or**
- **Elimination of slum and blight in the community.**

This year-end report provides an assessment of the accomplishments and financial expenditures for Program Year (PY) 2024 for the COT, encompassing July 1, 2024 through June 30, 2025. This report informs HUD and the residents of Toledo about the initiatives supported and compares actual outcomes to the goals outlined in the five-year and one-year plans.

For PY 2024-2025, the COT partnered with numerous agencies and organizations to advance the priorities outlined in the Consolidated Plan. In addition, local, state, and federal organizations contributed funding to support these same priorities, leveraging HUD dollars to maximize impact. Efforts during the program year primarily focused on the following priority areas:

- Improvements to Public Facilities.
- Improvement of housing conditions – rehabilitation and repair of owner-occupied and rental properties, along with housing code enforcement activities.
- Demolition of vacant Structures.
- Support for Social and Human Service Organizations - including foreclosure prevention, educational and life-skills programming, feeding programs, access to health services, and legal assistance for housing-related issues.
- Ending Homelessness.
- Economic Development.

These activities continue to support neighborhood stabilization efforts and contribute to the economic recovery of the COT and its residents. Significant progress has been achieved in these areas, as reflected in the quantitative information presented in **Table 1: Accomplishments - Program Year & Strategic Plan to Date**, included in this report.

As the department worked to achieve the goals and objectives outlined in the 2020-2024 Five-Year Consolidated Plan, adjustments have been made to address ongoing changes in the economic and social environment. With the housing market showing gradual recovery, resources are being used for both new construction and home restoration and maintenance. At the same time, additional efforts are underway to expand opportunities for Toledo residents to achieve affordable homeownership.

The COVID-19 pandemic and subsequent variants have had a lasting impact on the COT and its residents. Supplemental funding through the CARES Act has been vital in meeting emerging and complex community needs, while annual CDBG funds have continued to ensure that the city's most vulnerable residents receive essential services.

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

The COT, as an entitlement city and participating jurisdiction, receives direct funding from the U.S. Department of Housing and Urban Development (HUD) for the following three federal programs:

- Community Development Block Grant (CDBG) Program
- HOME Investment Partnership (HOME) Program
- Emergency Solutions Grant (ESG) Program

The COT's 2024 (50th) Program Year (PY), encompassing July 1, 2024 through June 30, 2025, marks the fifth and final year of the 2020-2024 Five-Year Consolidated Plan. Projects selected for funding were prioritized not only for their ability to promote neighborhood revitalization, community development, and economic growth, but also for their alignment with the goals identified in the 2020-2024 Five-Year Consolidated Plan

Despite the ongoing challenges faced by the city as a result of the 2020 pandemic and its subsequent variants, Toledo continued to make measurable progress toward the objectives outlined in both the 2024-2025 Annual Action Plan and the 2020-2024 Five-Year Consolidated Plan.

The COT received CARES Act funding to prevent, prepare for, and respond to the Coronavirus (COVID-19). The city was awarded **\$5,979,865** in Community Development Block Grant (CDBG-CV) funding and **\$4,875,338** in Emergency Solutions Grant (ESG-CV) funding. As of this report, the ESG-CV allocation has been fully expended, while the CDBG-CV funds are still being drawn down to complete remaining activities. To date, approximately **\$5,184,944** of CDBG-CV funds have been spent.

The first substantial amendment, included CDBG-CV and ESG-CV funding. Through CDBG-CV resources, the city supported activities such as Business Assistance, Emergency Rental Assistance, COVID-19 Testing, Supplies and Cleaning, Food Security, Youth/Senior/Special Populations Assistance, Legal Support, and Outreach. Accomplishments to date include:

- Business Assistance: **274** businesses assisted
- Emergency Rental Assistance: **595** households assisted
- Testing: **11,596** persons assisted
- Supplies/Cleaning: **5,570** persons assisted
- Food Security: **35,515** persons assisted
- Youth, Senior, Special Populations - **1,575** persons assisted (**13** youth, **1,482** seniors, and **80** homeless individuals)
- Legal Support/Evictions: **91** persons assisted
- Outreach: **22,844** persons assisted

The ESG-CV funding from this amendment were fully expended, with accomplishments including:

- Emergency Rental Assistance: **406** households assisted
- Laundry Equipment: **587** persons assisted
- Street Outreach: **365** persons assisted
- CoC Collaborative: **35,238** persons assisted (**9,289** Administration; **5,920** Supplies & Equipment; **7,032** Shared Services; **12,997** Staff Incentives & Pay).

The second substantial amendment utilized CDBG-CV funding to launch the Emergency Mortgage Assistance Program (EMAP), which stabilized housing for owner-occupied households during the pandemic crisis. This completed activity assisted **62** households at a total cost of **\$471,700.43**.

The third substantial amendment allocated ESG-CV funding, which has since been fully spent. In partnership with Toledo Public Schools (TPS), the Toledo Lucas County Homelessness Board (TLCHB), and Lutheran Social Services of Northwestern Ohio, the city provided housing stabilization assistance to families of TPS students. This completed activity assisted **217** families.

In February 2023, the U.S. Department of Housing and Urban Development (HUD) approved the Old South End and Englewood Neighborhood Revitalization Strategy Areas (NRSAs) for the City of Toledo Department of Housing and Community Development (DHCD).

For program year 2024, HUD further approved the Junction Choice Neighborhood Plan, establishing Junction as the City's third NRSA. In addition, DHCD designated three neighborhoods in East Toledo – Garfield, Raymer, and Starr as target areas for concentrated investment.

The following activities and investments represent DHCD and partner agency efforts in the three NRSAs and the East Toledo target areas during the reporting period.

Home At Last (HAL) Down Payment Assistance (DPA) program: Total Investment - \$38,336.41

- Junction: \$15,000.00 to 2 households
- Old South End: \$9,336.41 to 1 household
- East Toledo: \$14,000.00 to 2 households

Roof Replacement Program (Rooftops)

- Englewood: 1 completion – \$18,705.00 (CDBG)
- Junction: 1 completion – \$21,273.00 (ARPA)
- East Toledo: 2 completions – \$33,342.00 (CDBG \$20,852.00 / ARPA \$12,490.00)
 - Total DHCD Roofs: 4 completions
- Partner Work: \$91,070.96 (Englewood, East Toledo, citywide)/\$55,325.98 (Junction & Old South End)

Lead Paint Abatement: Total Investment - \$238,120.46

- Englewood: 2 completions (\$58,836.98), 5 scheduled
- Old South End: 1 scheduled
- East Toledo: 10 completions (\$179,283.48), 22 scheduled

Department of Public Services – Demolition & Tree Planting

- Englewood: 6 demolitions and 156 trees planted
- Junction: 121 demolitions (0 trees planted)
- Old South End: 36 demolitions (0 trees planted)
- Raymer: 1 demolition (0 trees planted)
- Starr: 5 demolitions (0 trees planted).

Economic Development – \$363,293.00

- Old South End: 3 businesses – \$99,600.00
- Englewood: 3 businesses – \$70,000.00
- Junction: 2 businesses – \$78,693.00
- Starr (East Toledo): 2 businesses – \$115,000.00

Parks & Recreation – \$2,260,299.60 Invested (with \$844,179.25 Pending)

- Junction: \$271,251.00 – Savage Park revitalization
- Englewood: \$1,088,907.75 – Robinson Park shelter & athletic field; pool & Smith Park athletic field
- Old South End: \$520,411.11 – Amphitheatre & Loop Trail at Danny Thomas Park updates; Ashley Park playground equipment upgrades
- East Toledo:
 - Garfield neighborhood: \$19,725.18 – Ravine II Park Field bleacher upgrades
 - Starr neighborhood: \$185,841.40 – Prentice Park playground equipment upgrades
 - Raymer neighborhood: \$174,163.16 – Burnett Park playground equipment upgrades

Public Services Initiatives

Youth Programs:

- Old South End: **\$74,991.20** – 86 youth assisted – CDBO
- Junction: **71,562.59** – 71 youth assisted

Community Gardens:

- Old South End: **\$90,000.00** – 276 persons assisted

Financial Opportunity Center:

- Junction: **\$13,766.89** – 52 persons assisted

Food Baskets/Boxes

- Old South End: **\$60,000.00** – 6,985 persons assisted
- Junction: **\$65,725.61** – 1,791 persons assisted

Senior Home Repairs:

- Englewood: **\$144,876.82** – 14 households assisted

Across Program Year 2024-2025, the City of Toledo DHCD and partner agencies strategically invested in housing, infrastructure, economic development, public amenities, and social services within the three NRSAs and targeted East Toledo neighborhoods. These efforts directly advanced HUD’s community revitalization goals, supported low-to-moderate income households, and strengthened neighborhood resilience through coordinated public and private investment.

The department remained focused on two of HUD’s three national objectives: providing assistance to low- and moderate-income (LMI) individuals and addressing slum and blight conditions within the community. In alignment with the priorities established in the Five-Year Consolidated Plan, the City will continue to emphasize the development of safe, adequate, and affordable housing; the reduction and prevention of homelessness; improvements to public infrastructure and facilities; implementation of the Fair Housing Action Plan (FHAP); and the provision of essential services, including food, life skills, and healthcare.

To carry out these priorities, the Department of Housing and Community Development (DHCD) administered programs in collaboration with community partners. These efforts focus on rehabilitating and repairing homes, preserving housing affordability, addressing lead hazards, and, in many cases, preventing homelessness.

Homeownership continues to be supported through the HOME Investment Partnerships Program (HOME). During the program year, the department assisted **58** first-time homebuyers in the purchase of their homes. As part of the process, each participant completed an eight-hour, HUD-mandated homeownership training course provided by a HUD-approved counseling agency. The training equipped prospective homeowners with the knowledge to navigate the property acquisition process and to better understand the financial responsibilities associated with homeownership.

Programs supported by Community Gardens continue to reduce blight and enhance neighborhoods. By involving residents and fostering a sense of ownership and stewardship among residents in low-income areas, increased access to fresh food enhances the neighborhood. Programs supported by community gardens provided services to **3,704** persons.

HUD Section 108 – COT established a \$37 million loan pool for long-term, fixed-rate, affordable financing. Funds will be utilized to close financing gaps, allow borrowers to complete their deals, generate and maintain jobs, increase affordable housing, enhance equity and equitable development prospects, and expand the existing tax base. The City has closed on two loans, each worth \$2 million, for community centers improvements and for economic development. A third loan will close before the end of 2025 for \$616,000 in economic development.

HUD PRO Housing Grant — Toledo was one of 18 communities to receive awards and received \$4,000,000. The grant's activities include a comprehensive zoning rewrite, pre-approved templates for new housing construction, and funding for the NRSA UPLIFT Initiative. DHCD received \$1,600,000 for the program pool and, with the grant award, had pledged to expand the program from two to all three NRSAs and to increase the overall funding impact to 75 new or preserved homes during the grant performance period.

NRSA UPLIFT Initiative – Formerly the NRSA Appraisal Gap Financing, NRSA UPLIFT is a \$3 million pilot project that will be funded using a portion of the \$4,000,000 Community Project Funding (CPF) Grant and the HUD PRO Grant. The city engaged a workgroup to develop a program to provide appraisal gap financing in the designated NRSAs. The program's goals are to enhance housing markets, incentivize the acquisition and repair of unoccupied housing, rehabilitate owner-occupied housing, and build new housing in the NRSAs. The Initiative is rehabilitating a pilot home to launch the program.

Affordable Housing Development

- Evergreen Heights – 52 units - Senior Housing (closed August 2025)
- Whitney Manor – 20 units – Supportive Housing with Services (closing Fall 2025)
- HSI Infill Housing 2025 – 1 unit – single-family home

In its 50th program year, the Department of Economic Development awarded four loans totaling \$370,000. These funds supported the launch of one new business and the expansion of three existing businesses, creating at least 12 new jobs in the City.

The Toledo Lucas County Emergency Rental Assistance Program (TLCERAP) continued its efforts throughout Program Year 2022, providing emergency rental, utility, and internet service assistance to LMI households. Since 2021, there has been over \$42 million awarded to the City and County from the U. S. Department of Treasury for Emergency Rental Assistance (ERA). The Toledo Lucas County Emergency Rental Assistance Program (TLCERAP) continued its efforts throughout Program Year 2023, providing emergency rental, utility, and internet service assistance to LMI households. Since 2021, there has been over \$42 million awarded to the City and County from the U. S. Department of Treasury for Emergency Rental Assistance (ERA).

During the 2024 PY, TLCERAP disbursed approximately **\$2.4** million in rental and utility expenses for **388** LMI households in Toledo and Lucas County. The program was shut down for new applications effective December 31, 2023.

In addition to DHCD's ongoing efforts to reduce lead-based paint hazards, the City of Toledo (COT) revised and passed an updated Lead-Safe Ordinance in September 2020. Under this ordinance, 1–4-unit residential structures and family child care homes built prior to 1978 must undergo and pass a lead clearance—including a visual assessment and dust-wipe sampling—and register to receive a Lead-Safe Certificate.

Legal and Policy Milestones

- June 27, 2022: A lawsuit led the City to temporarily delay enforcement until August 1, 2022 to facilitate resolution efforts.
- June 27, 2022: A lawsuit led the City to temporarily delay enforcement until August 1, 2022 to facilitate resolution efforts.
- April 1, 2023: A judge granted a preliminary injunction halting the ordinance.
- June 22, 2023: A judge denied a motion to stop the ordinance from going into effect.
- January 2025: The Ohio Supreme Court declined to hear an appeal in the Toledo Lead Ordinance case.
- April 2025: City Council unanimously approved updates to the ordinance and adopted a revised phase-in schedule.

Revised Phase-In Schedule (Adopted April 2025)

- The revised compliance timeline establishes eight (8) deadline dates, beginning with the first phase-in deadline on December 31, 2025.
- Phasing continues by census tract, prioritizing the highest at-risk areas.

Compliance to Date

- As of August 18, 2025, there are 4,325 rental units in compliance with the Lead-Safe Ordinance.

ODH Lead Safe Housing Fund Community Primary Prevention Grant

- Award: \$1.05 million from the Ohio Department of Health (awarded July 2023 – June 2025)
- Grant Period Covered: July 2023 – June 2025
- Use of Funds (total \$1.05M expended):
 - Reimbursable Lead Stabilization Grant (financial assistance to support lead stabilization activities);
 - Advertising (public awareness and outreach campaigns);
 - Education and Training (community workshops and staff/partner training);
 - Lead Testing Kits (distribution and related outreach);
 - Enforcement & Compliance Software (ODH-funded purchase to support application intake, case tracking, reporting and audit trails)
 - Lead Resource Center (start-up and operational support).

The DHCD continues to work closely with the lead CoC Toledo Lucas County Homelessness Board (TLCHB) in its continued efforts toward the prevention and elimination of homelessness. In addition, many local nonprofit agencies, through funding provided by the COT, provide programs that meet the needs of individuals and their families who are homeless or at imminent risk of becoming homeless.

The COT and The Fair Housing Center (TFHC) continue to work with community partners on the implementation of the Five-Year Fair Housing Action Plan (FHAP). The FHAP provides quarterly and annual updates on the action steps that are undertaken to address barriers to housing choice identified in the 2020-2024 Analysis of Impediments. **(See the annual update on the FHAP in the attachments)**

The Fair Housing Center continues to handle a significant number of fair housing cases, assisting individuals experiencing housing discrimination. This work is made possible by CDBG funding from the City of Toledo and funding directly from HUD. During the reporting period, the Center received more than **2,000** intakes, and pursued a full fair housing investigation in more than **125** cases, and more than **8,000** people were positively impacted by this work.

The Fair Housing Center also regularly conducts education and outreach activities to advance the Action Plan. More than **13** million impressions have been realized as a result of this work, and well over **30** trainings have been conducted. An impression is realized when an adult, who is 18 years of age or older, is exposed to the intended advertising, outreach, or program. The frequency with which people encounter one of their communications is one method the Fair Housing Center measures the effectiveness of its efforts.

The Fair Housing Center will celebrate its 50th anniversary in 2025. The City of Toledo has provided funding to the Center for all of those 50 years, which may be the longest running partnership between the City and a nonprofit organization. In this most recent year, The Center continued its status as one of the most progressive fair housing organizations in the country, successfully advocating for policies to reduce childhood lead poisoning and discrimination based on source of income, while also litigating fair housing cases.

The Department of Housing and Community Development (DHCD) continues to utilize ZoomGrants for online applications, electronic accomplishment reporting, requests for funds, and overall management of CDBG, ESG and HOME sub-recipients. In addition, ZoomGrants facilitated the work of the Citizen Review Committee (CRC), enabling members to review, score, and recommend funding for CDBG, ESG, and HOME sub-recipients. The implementation of this online platform has reduced both the time and cost associated with the application review process, increased the efficiency of program management, and generated significant cost savings for the department.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

The accomplishments table prescribed by HUD has been updated and contains a comparison of actual accomplishments vs. the goals of the five-year strategic and one-year plans. The following table represents **Preliminary Data** related to accomplishments for the 2024 (50th) PY. The final data will be included in the final version of this CAPER.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Business Recruitment/Retention Assistance	Non-Housing Community Development	CDBG: \$100,000 (carryover)	Businesses assisted	Businesses Assisted	0	53		60	49	80%
Code Enforcement & Nuisance Abatement incl. Rental	Non-Housing Community Development		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	200,000	115,211	58%	0	0	0%
Coordinated Access for Homelessness	Homeless Non-Housing Community Development	ESG: \$226,429	Other	Other	1	1	100%	1	1	100%
Demolition/Clearance in Citywide Low Income Areas	Non-Housing Community Development		Buildings Demolished	Buildings	40	27	68%	0	0	0%
Establish and Maintain Community Gardens	Non-Housing Community Development	CDBG: \$164,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,880	20,276	127%	3,245	3,704	114%

Fair Housing Planning & Services	Non-Housing Community Development	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	17,535	8,089	46%	500	632	126%
HOME Administration	Affordable Housing Public Housing Homeless	HOME: \$189,901	Other	Other	1	1	100%	1	1	100%
Home Buyer Down Payment/Closing Costs Assistance	Affordable Housing	HOME: \$150,000 (carryover) \$100,000	Direct Financial Assistance to Homebuyers	Households Assisted	122	278	228%	20	58	290%
HOME CHDO Set-aside	Affordable Housing	HOME: \$284,852	Homeowner Housing Added	Household Housing Unit	21	4	19%	2	0	0%
Home Repairs for Seniors and the Disabled	Affordable Housing Non-Homeless Special Needs	CDBG: \$569,070	Homeowner Housing Rehabilitated	Household Housing Unit	540	574	106%	126	37	29%
HOME: Home Buyer Development	Affordable Housing	HOME: \$274,261 (carryover) \$1,469,953	Homeowner Housing Added	Household Housing Unit	5	16	320%	6	0	0%

Housing Rehabilitation Administration - CDBG	Affordable Housing	CDBG: \$900,000	Other	Other	1	1	100%	1	1	100%
Housing Repairs and Rehabilitation	Affordable Housing	CDBG: \$1,413,958 HOME: \$400,000 (carryover) \$400,000	Homeowner Housing Rehabilitated	Household Housing Unit	1,363	729	53%	100	33	33%
Housing/services for non-homeless special need pop	Affordable Housing Non-Homeless Special Needs		Other	Other	0	3	300%	0	0	0%
Improved Neighborhoods by Comprehensive Planning	Non-Housing Community Development		Other	Other	1	6	600%	0	0	0%
Improvements to parks and community facilities	Non-Housing Community Development	CDBG: \$1,000,000 (carryover) \$915,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted Other	60,000 5	72,449 9	121% 180%	0 8	0 0	 0%

Improvements to public infrastructure for LMI	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	541	433%	0	0	0%
Increase in transitional housing	Affordable Housing Homeless	CDBG: \$88,765	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	110	119	108%	25	52	208%
Increase number of emergency shelters	Affordable Housing Homeless	ESG: \$345,000	Homeless Person Overnight Shelter	Persons Assisted	2,945	3,666	124%	850	982	115%
Increase or new public services	Non-Housing Community Development	CDBG: \$1,127,424	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	169,377	74,100	44%	12,700	14,440	114%
Job Creation/Retention incl. returning citizens	Non-Housing Community Development	CDBG: \$175,000	Jobs created/retained	Jobs	7	39	557%	20	12	60%

Large rental housing/low-income housing tax credit	Affordable Housing	HOME: \$600,000 (carryover) \$2,000,000	Rental units constructed	Household Housing Unit	15	65	433%	20	0	0%
Local affordable housing capacity - public services	Affordable Housing	CDBG: \$200,000 Section 108: \$32,134,000	Other	Other	8	2	25%	1	1	100%
Permanent Supportive Housing	Affordable Housing Homeless		Housing for Homeless added	Household Housing Unit	810	52	6%	0	0	0%
Planning and Administration - CDBG	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$1,222,919	Other	Other	1	1	100%	1	1	100%
Rapid Re-Housing and Direct Financial Assistance	Affordable Housing Homeless	ESG: \$75,000	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	620	824	133%	80	160	200%

Slum and blight reduction	Non-Housing Community Development	CDBG: \$69,462 (carryover) \$1,000,000	Housing Code Enforcement/ Foreclosed Property Care	Household Housing Unit	5,750	5,047	88%	700	396	56%
Small rental housing financing and education	Affordable Housing		Rental units rehabilitated	Household Housing Unit	12	6	50%	0	0	0%
Supplement Lead Hazard Grants for At Risk Families	Affordable Housing Lead Remediation Rehab		Homeowner Housing Rehabilitated	Household Housing Unit	150	38	25%	0	15	
Targeted Neighborhood Home Repairs	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	40	29	73%	0	3	
Targeted Neighborhood Slum and Blight Reduction	Non-Housing Community Development		Other	Other	1	1	100%	0	0	0%
Transportation support	Non-Housing Community Development		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	1,050	240	23%	0	0	0%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

FUNDING	PROJECTS	ACTUAL	UNIT OF MEASURE
CDBG-CV	CV-Business Assistance	274	Businesses Assisted
	CV-Emergency Rental Assistance	595	Households Assisted
	CV-Testing	11,596	Persons Assisted
	CV-Supplies/Cleaning	5,570	Persons Assisted
	CV-Food Security	35,515	Persons Assisted
	CV-Legal Support/Evictions	91	Persons Assisted
	CV-Youth, Senior, Special Populations	1,575	Persons Assisted
	CV-Outreach	22,844	Persons Assisted
	CV-Emergency Mortgage Assistance Program (EMAP)	62	Households Assisted
ESG-CV	CV- Emergency Rental Assistance	406	Households Assisted
	CV-Equipment	587	Persons Assisted
	CV-Street Outreach	365	Persons Assisted
	CV-Toledo Public Schools Stabilization Program	217	Families
	CV-CoC Collaborative	35,238	Persons Assisted

Table 2 - COVID ACCOMPLISHMENTS

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

As an entitlement community, the City of Toledo (COT) received **\$7,134,598** in Community Development Block Grant (CDBG) funds, **\$1,899,014.76** in HOME Investment Partnerships Program (HOME) funds plus **\$2,888** in program income, and **\$646,429** in Emergency Solutions Grant (ESG) funds for the 2024 (50th) program year. The activities undertaken supported the goals outlined in the 2020–2024 Five-Year Consolidated Plan and the 2024 Annual Action Plan. The Department of Housing and Community Development (DHCD) evaluated each funded project to ensure eligibility and compliance with CDBG, HOME, and ESG regulations. Potential applicants are educated on the priorities and goals established in the Five-Year Consolidated Plan, and each funded proposal is required to address at least one of those priorities.

A significant portion of CDBG and HOME resources were directed toward housing activities, including the rehabilitation of owner-occupied and rental units, as well as down payment assistance to promote affordable homeownership. Housing activities and code enforcement remain among the DHCD’s highest priorities. Complementary efforts—including the prevention and reduction of blight, the provision of basic needs and social services, and economic development activities—further strengthened the City’s ability to serve low- and moderate-income residents while reducing blight in low-income neighborhoods.

The accomplishments outlined in Table 1 reflect progress made during program year 2024 toward the goals established in the 2020–2024 Consolidated Plan and the 2024 Annual Action Plan. Table 2 provides a summary of outcomes achieved through the City’s COVID-related initiatives.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a) .

The table below represents **Preliminary Data** related to racial and ethnic composition the individuals and families assisted in the 2024 (50th) PY. The final data will be included in the final version of this CAPER.

	CDBG	HOME
White	7,106	26
Black or African American	8,937	32
Asian	27	0
American Indian or American Native	350	0
Native Hawaiian or Other Pacific Islander	37	0
Total	16,457	58
Hispanic	1,978	1
Not Hispanic	14,479	57

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)	
	HESG
American Indian, Alaska Native, or Indigenous	17
Asian or Asian American	1
Black, African American, or African	515
Hispanic/Latina/e/o	54
Middle Eastern or North African	0
Native Hawaiian or Pacific Islander	4
White	282
Multiracial	0
Client doesn't know	0
Client prefers not to answer	0
Data not collected	0
Total	873

Table 3 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Data regarding beneficiaries of CDBG, CDBG-CV, HOME, and ESG assistance is shown in the tables above. Under CDBG, **54%** of those served were minorities (primarily Black or African American), and under HOME, **55%** were minorities.

Additionally, **12%** of CDBG beneficiaries and **2%** of HOME beneficiaries identified as Hispanic.

The tables do not reflect all racial and ethnic groups assisted. Additional categories reported in IDIS include:

- American Indian/Alaskan Native & White – **3**
- Asian & White – **1**
- Black/African American & White – **420**
- American Indian/Alaskan Native & Black/African American – **1**
- Other Multi-Racial – **1,134**

Of those in the above categories, **409** individuals or families (**26%**) identified as Hispanic.

The HESG racial composition of beneficiaries, as reported in SAGE, shows that **59%** were Black or African American and **6%** were Hispanic.

As illustrated in the attached maps, the largest concentrations of minorities in Toledo reside within low- and moderate-income census tracts.

In compliance with HUD regulations, the City of Toledo allocated at least 70% of its 2024–2025 CDBG entitlement award to programs that directly benefit low- and moderate-income individuals and families.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

The table below represents **Preliminary Data** related to the amounts expended in the 2024 (50th) PY. The final data will be included in the final version of this CAPER.

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	9,149,598	6,542,265
HOME	public - federal	4,548,855	2,578,795
ESG	public - federal	646,429	586,900
HUD Section 108	public - federal	32,134,000	0
Continuum of Care	public - federal	4,398,182	2,643,985
HUD Office of Lead Hazard Control and Healthy Homes	public - federal	2,604,133	1,025,392
CDBG-CV	public - federal	113,947	101,029
HOME American Rescue Plan (HOME-ARP)	public - federal	7,789,937	37,223
United States Department of Treasury	public - federal	3,193,753	1,856,995
Lead Hazard Control and Healthy Homes	public - federal	70,115	134,980
BP Husky Settlement	private	700,334	326,205
Ohio Lead Safe	public – federal	500,000	500,000
Ohio Department of Development	public – federal	3,446,000	185
EDI Community Project Funding (CPF) Grant	Public – federal	4,000,000	1,605

Table 4 - Resources Made Available

Narrative

The table above represents the amount of resources available and the amount expended in 2024 (50th) PY. Other funding sources included expenditures through the American Rescue Plan Act (ARPA), HUD Office of Lead Hazard Control and Healthy Homes, CDBG-CV, ESG-CV, United States Department of Treasury, Lead Hazard Control and Healthy Homes, Ohio Department of Health, Land Bank, and BP Husky Settlement.

For Continuum of Care (CoC), the CoC partners receive and request the funding contract directly from HUD. Some CoC partners have program year or spending cycle start dates that differ from the CAPER reporting period.

The city was awarded **\$5,979,865** in Community Development Block Grant (CDBG-CV) funding and **\$4,875,338** in Emergency Solutions Grant (ESG-CV) funding. As of this report, the ESG-CV allocation has been fully expended, while the CDBG-CV funds are still being drawn down to complete remaining activities. To date, approximately **\$5,184,944** of CDBG-CV funds have been spent.

Identify the geographic distribution and location of investments

The table below represents **Preliminary Data** related to the Actual Percentage of Allocation in the 2024 (50th) PY. The final data will be included in the final version of this CAPER.

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	68	71	
Englewood NRSA	15	12	NRSA
Garfield /Starr/ Raymer	1	1	Targeted Investment Area
Junction/Englewood	1	1	Targeted Investment Area
Old South End NRSA	15	15	NRSA

Table 5 – Identify the geographic distribution and location of investments

Narrative

National economic conditions continue to affect Toledo’s efforts in neighborhood revitalization and stabilization. Many neighborhoods that were once thriving now face challenges such as an aging housing stock, increasing numbers of abandoned and deteriorating structures that contribute to blight, and limited opportunities for economic development. To address these issues, investments were directed to support low- and moderate-income residents, with a focus on minorities, retirees, and individuals with disabilities.

The Department of Housing and Community Development (DHCD) concentrated resources in the city’s most economically distressed areas. In alignment with the city’s strategy, efforts were targeted to census tracts where more than 51% of residents are low- and moderate-income (see attached maps).

The low- and moderate-income census tracts are: 8, 9, 10.01, 10.02 11, 12.02, 13.02, 14, 15, 16.01, 16.02, 17, 18, 19, 20, 24.01, 24.02, 25, 26, 27, 28, 29, 30, 31, 32, 33, 35, 36, 39.01, 39.02, 40, 42, 46, 47.01, 47.02, 48, 49, 50, 51.01, 51.02, 52, 53, 54, 57.01, 59.02, 66, 67, 68.01, 68.02, 73.02, 73.06, 73.07, 103, 105 and 106.

In addition to Citywide activities, the city also used geographic, place-based strategies to reach the goals that were identified in the 2020-2024 Five-Year Consolidated Plan. The DHCD concentrated its efforts in the most economically disadvantaged areas of the City by using two main strategies: (1) slum and blight reduction and (2) targeted investments.

In February 2023, HUD approved the Old South End and Englewood as Neighborhood Revitalization Strategy Areas (NRSAs) for the City of Toledo’s Department of Housing and Community Development (DHCD).

In 2024, HUD also approved the Junction Choice Neighborhood Plan, making Junction the City’s third NRSA. Additionally, the DHCD identified Garfield, Raymer, and Starr in East Toledo as additional target areas for focused investment.

The COT, in adherence to HUD regulations, allocated at least 70% of its 2024-2025 CDBG entitlement award to programs that directly benefit low- and moderate-income individuals and families.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The COT partners with federal, state, and local organizations to address the priorities identified in the 2020-2024 Five-Year Consolidated Plan. HUD's allocations assisted in leveraging other resources and efforts for the COT and its Third-Party Partners. The combination of CDBG dollars and other resources makes it possible for Third-Party Partners to carry out their activities. Federal and state funds are leveraged by non-profits, which seek out additional dollars for operational and project expenses.

To satisfy the DHCD's policy on matching requirements for CDBG and ESG, Third-Party Partners are required to seek other funding sources as a 1:1 match for their CDBG and ESG allocation. Resources used as a match included federal, state, and local resources such as Local Initiatives Support Corporation (LISC), Ohio Department of Job and Family Services (ODJFS), Ohio Arts Council, Hospital Council of Northwest Ohio (HCNO), United Way of Greater Toledo, Area Office on Aging, private foundations and contributions, grants, local banks, program fees, developer's fees, etc.

Each HOME Participating Jurisdiction (PJ) incurs a match liability, which must be satisfied by the end of each fiscal year. This liability requires PJs to match 25 cents for each dollar of HOME funds spent toward affordable housing. Match contributions must be ones that are permanent to affordable housing provided by any public or private donor and must come from a non-federal source. The COT remains at 100% match reduction due to its distress status.

To carry out housing, economic, and community development activities, CDBG- and HOME-funded programs may obtain publicly owned land or property through the Lucas County Land Reutilization Corporation (Land Bank). HOME funds may support rehabilitation but are not used directly to acquire the property.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	0
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	0
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	0

Table 6 – Fiscal Year Summary - HOME Match Report

The tables below represent Preliminary Data in the 2024 (50th) PY. The final data will be included in the final version of this CAPER.

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 7 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
445,230	8,457	452,413	0	1,274

Table 8 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 9 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 10 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		13		9,099		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	18	3	7
Cost	0	0	0	0	0	0

Table 11 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

The tables below represent Preliminary Data in the 2024 (50th) PY. The final data will be included in the final version of this CAPER.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	80	160
Number of Non-Homeless households to be provided affordable housing units	148	91
Number of Special-Needs households to be provided affordable housing units	126	37
Total	354	288

Table 12 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	80	160
Number of households supported through The Production of New Units	22	0
Number of households supported through Rehab of Existing Units	226	70
Number of households supported through Acquisition of Existing Units	26	58
Total	354	288

Table 13 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

In the table above, the one-year goal was estimated in the Annual Action Plan. The actual numbers for 2024 (50th) PY are reported with details below on the goals.

As in the previous year, with the availability of Emergency Rental Assistance (ERA) funding from the U.S. Department of Treasury, most of the potential landlord participants opted to use ERA funding as opposed to Tenant Based Rental Assistance (TRBA).

Rental and other associated housing costs to apply and engage in new housing have significantly raised the cost per household served. This has had a significant impact on the number of households that can be served.

Discuss how these outcomes will impact future annual action plans.

The DHCD has stressed a renewed focus on its core programs to try and help achieve the goals set forth in the action plan.

- Focus on Owner-Occupied Rehabilitation
- Down Payment Assistance Programs
- Affordable Housing Developments
- Rooftops Programs

The Housing staff will make it a priority to reach out to the contractor pool to complete HOME activities. The rehab staff will also work vigorously with contractors to try and achieve finalization of jobs. The team will review Integrated Disbursement Information Systems (IDIS) in an effort to stay on top of jobs that may be lingering in the open stage as well as to ensure timely close-out of projects. This will also ensure that projects are completed during the appropriate program year.

Staff is also actively being trained to better enhance their knowledge and guidance in coming up with ways in which to ensure maximum efficiency is achieved within each program.

As we move forward with HOME-ARP, the City is soliciting ideas from partner organizations in order to address housing needs and barriers faced by Qualifying Populations (QPs), especially for effectively using the funds for a HOME-ARP TBRA. The DHCD will continue to re-evaluate its support goals and use proactive measures to ensure success for the five-year period.

The City of Toledo has an ordinance that requires construction projects receiving more than \$100,000 in funding to sign a Project Labor Agreement (PLA). This requirement will limit our nonprofit organizations' capacity to continue affordable housing projects. As a result, outcomes may be very low, reflecting the hindrance to effective nonprofit affordable housing activities.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	29	4
Low-income	21	39
Moderate-income	0	36
Total	50	79

Table 14 – Number of Households Served

Narrative Information

The DHCD continues its partnership with local non-profit agencies to carry out housing support assistance. The agencies administer the rehabilitation of existing units and the production of new units. The primary goals of the partnership with non-profits are to increase housing support productivity while reducing costs. In addition to increased productivity and reduced costs, the partnerships also help to facilitate interaction, such as outreach, trust, and sharing, between the communities being served and the agencies that provide the support. The DHCD is committed to working with its partner(s) to improve and provide decent and safe housing to the communities it serves.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)
Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Over the past year, the Continuum of Care (CoC) has made significant strides in addressing unsheltered homelessness through increased coordination, targeted outreach, and structural improvements. A key development has been the establishment of an **Encampment Engagement email thread**, which facilitates real-time communication among a cross-sector group of partners—including police, zoning officials, street outreach teams, and PATH employees. This collaborative model has improved the identification of encampments and streamlined service delivery to those residing in unsheltered locations.

Additionally, the community is working toward integrating **street outreach as a formal access point** into the Coordinated Entry System. This shift will ensure that individuals encountered through outreach efforts can be assessed and connected to housing resources more efficiently. In support of this evolution, the CoC has also revamped the **housing prioritization assessment tool**, with implementation of the new version planned for January 2026. These updates aim to more accurately capture individual needs and vulnerabilities, allowing for more equitable housing placements.

The CoC has more fully integrated street outreach efforts into the local Coordinated Entry System. Outreach teams assess individuals and families in the locations where they are found and offer a range of services as appropriate, including engagement, case management, transportation, and connections to emergency health and mental health care. Emergency hotel and motel funds are used to bridge the gap between referral and placement into permanent housing when shelter or housing is unavailable. Enhancing the CoC with Housing Navigators that can assist with Coordinated Access is the next step in integrating street outreach into the mainstream CoC process.

The **Neighborhood Properties, Inc. (NPI) PATH Team**, which receives both CoC and SAMHSA PATH funding, plays a critical role in outreach. PATH focuses on assertive outreach to individuals experiencing severe and persistent mental illness (SPMI), including those with co-occurring substance use disorders. PATH staff assist with documents, applications, and appointments needed for housing and treatment, and typically work with individuals for up to 90 days. Their work is vital in bridging gaps between street-level engagement and long-term housing solutions.

The **Zepf Center's Safety Net Street Outreach Program (SOP)** provides dedicated services to runaways and homeless youth, including those at risk of trafficking. Zepf operates Lucas County's only drop-in shelter for youth under age 18 and has been providing youth-centered street outreach since 2019. The program continues to engage youth and collaborates with multiple coalitions, including the Lucas County Human Trafficking Coalition and the Toledo Runaway Task Force. SOP focuses on building trust, connecting youth to essential services, and ultimately supporting their exit from homelessness.

Despite these efforts, systemic barriers persist. The Grant Pass v. Johnson case has opened the door to discussions around encampment response, but local communities still face legal, logistical, and moral complexities in balancing enforcement with support. There are limited Resources for street outreach expansion, which limits staffing and restricts the frequency and geographic coverage of encampments, especially in isolated areas.

The shortage of affordable and appropriate housing solutions, especially for individuals in the 18–24-year-old age range, including those aging out of foster care, remains a critical gap. While outreach teams are actively engaging this population, the lack of long-term housing solutions increases the risk of chronic homelessness. The creation of Park Apartments will help alleviate this shortage for single young adults; however, other models will need to be identified to assist families where the head of household is a young adult.

TLCHB is participating in a statewide cohort focused on developing housing and support models for transition-age youth. While outreach is a crucial first step, addressing these challenges will require expanded housing stock, flexible funding, and policies that center the needs of vulnerable populations.

Addressing the emergency shelter and transitional housing needs of homeless persons

Over the past year, the Toledo Lucas County Homelessness Board (TLCHB) and the Continuum of Care (CoC) have made important progress in expanding outreach services, improving coordinated access, and developing new housing resources for individuals experiencing homelessness. One major accomplishment includes the addition of 46 Permanent Supportive Housing (PSH) units for single adults, which enhances the system’s capacity to house individuals with high service needs. In parallel, the CoC is developing a new PSH program specifically for youth aging out of foster care, with programming expected to begin in late 2025. This effort addresses a longstanding gap in services for transition-age youth who are at high risk of homelessness and housing instability.

To improve coordination and response to unsheltered homelessness, the CoC launched an Encampment Engagement email thread that brings together outreach providers, zoning officials, law enforcement, and city staff. This structure has enhanced the community’s ability to quickly identify encampments and deliver services in a coordinated, trauma-informed way. In addition, the CoC is moving toward formally including street outreach as a direct access point into the Coordinated Entry System, ensuring that unsheltered individuals can be assessed and referred to housing without the need to enter an emergency shelter first. In support of this shift, a new housing prioritization assessment tool has been developed and will be implemented in January 2026 to better capture household needs and streamline housing placements.

The CoC continues to partner with key outreach providers, including Neighborhood Properties Inc.’s PATH Team and the Zepf Center’s Safety Net Street Outreach Program. The PATH team, funded by SAMHSA and the CoC, serves individuals with serious mental illness and co-occurring disorders, providing engagement, case management, and assistance with obtaining documentation and treatment. The Zepf Center focuses on engaging runaway and homeless youth, including those at risk for trafficking, and operates Lucas County’s only drop-in center for youth under 18. Both teams play vital roles in connecting vulnerable populations to essential services and housing pathways.

Despite these advancements, several barriers continue to limit progress. The most significant is the ongoing shortage of affordable housing in Lucas County. While 364 households exited homelessness, only 256 moved into affordable units, underscoring the mismatch between need and availability. The lack of emergency housing options and limited outreach resources also restrict system flexibility and responsiveness. Legal uncertainty following the *Grant Pass v. Johnson* case and the President’s executive orders regarding unsheltered homelessness has complicated encampment response strategies, requiring communities to balance enforcement with the rights and needs of unsheltered individuals.

In response to these challenges, TLCHB will focus on expanding housing access, advocating for more street outreach, and supporting the development of housing for youth. The CoC will also improve data systems, formalize outreach as an access point, and implement the updated assessment tool in early 2026. These

changes are aimed at building a more equitable and effective homeless response system that prioritizes housing stability for all populations.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Over the past year, the Toledo Lucas County Homelessness Board (TLCHB) and its Continuum of Care (CoC) partners have worked diligently to prevent homelessness among extremely low-income individuals and families, with focused efforts on those at risk of homelessness following discharge from publicly funded systems of care. This includes people leaving hospitals, mental health treatment centers, foster care, youth facilities, and correctional institutions. Significant progress has been made in coordinating cross-sector partnerships to identify and support individuals vulnerable to housing instability during critical transition periods.

One of the key accomplishments has been the strengthening of community partnerships and protocols aimed at preventing discharge into homelessness. For example, the CoC has continued to collaborate with the Lucas County jail, local hospitals, and mental health institutions through the Housing Justice Peer Network to identify best practices for individuals who are homeless or at risk to engage inmates with services before they are released.

The CoC's Encampment Task Force and Encampment Engagement communication system—established in 2024—have also played a critical role in tracking individuals with system involvement and ensuring that they are connected to outreach teams and housing resources promptly.

Progress has also been made through the expansion of permanent supportive housing units and the upcoming development of a housing program for youth aging out of foster care, with implementation scheduled for September 2025. These targeted housing initiatives aim to catch individuals during vulnerable transitional periods and offer immediate stabilization through permanent housing and supportive services.

Additionally, outreach providers like PATH and the Zepf Center actively engage clients who have recently exited mental health, foster care, or juvenile justice systems, helping them connect to services and avoid homelessness altogether.

However, barriers continue to impact progress in preventing discharge into homelessness. Chief among these is the lack of standardized discharge policies across institutions. While some facilities have protocols in place, others discharge individuals without ensuring they have a safe and stable place to go. This is particularly true for those exiting from local jails, inpatient mental health facilities, and youth care settings. Furthermore, the limited availability of emergency housing, transitional programs, and affordable rental units makes it difficult to offer immediate placements for individuals who are identified at discharge as being at risk of homelessness.

The CoC also faces challenges in data sharing and coordination across systems, which hinders the ability to identify at-risk individuals before discharge. Without a centralized system to flag clients with prior system involvement, opportunities to intervene early are often missed. In the case of youth aging out of foster care, the absence of real-time data sharing with the child welfare system has delayed timely referrals to housing programs or case management services.

To address these challenges and improve outcomes, TLCHB is working on formalizing and aligning discharge planning protocols with key institutional partners. The CoC is developing MOUs and workflow agreements with local hospitals, correctional facilities, and child welfare agencies to ensure housing status is assessed as part of discharge planning. Additionally, a statewide initiative in which TLCHB is actively participating is focused on expanding housing and support models for transition-age youth. Investments are also being made in improved HMIS data integration to support earlier identification of individuals in need of housing stabilization pre-discharge.

Moving forward, the CoC will continue to prioritize cross-system coordination, early intervention, and targeted housing placements to prevent homelessness before it begins—especially for those exiting publicly funded systems of care and already navigating economic and social vulnerability.

The CoC recognizes a gap in service delivery for individuals and families who are likely to become homeless after being discharged from institutions. Conversations with key players in institutions help to reduce the gap in systemwide homelessness.

TLCHB has developed a strategic plan to address barriers and gaps to the homelessness system, including the implementation of Open HMIS. The concept of Open HMIS will allow system partners to work more cohesively and allow data to inform outcomes and improvements in a more meaningful way.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Over the past year, the Toledo Lucas County Homelessness Board (TLCHB) and its Continuum of Care (CoC) partners have made measurable progress in supporting individuals and families experiencing homelessness—particularly those who are chronically homeless, families with children, veterans, and unaccompanied youth—on their path to permanent housing and independent living. A key priority has been to reduce the length of time people remain homeless, increase access to affordable housing, and support long-term stability to prevent returns to homelessness.

A major accomplishment during this reporting period was the addition of 46 new Permanent Supportive Housing (PSH) units for single adults experiencing chronic homelessness. These units directly address the need for stable, service-enriched housing for individuals with long histories of homelessness and disabling conditions. In parallel, the CoC continues to prioritize households for housing through a Coordinated Entry System that uses a vulnerability-based assessment tool, ensuring those with the greatest needs are matched with appropriate housing resources as quickly as possible. In January 2026, an updated version of the assessment tool will be launched to improve accuracy in identifying needs and prioritizing referrals across all populations.

Progress has also been made in reducing barriers to accessing permanent housing, particularly through the integration of street outreach into Coordinated Entry. Outreach teams will have the ability to engage individuals in encampments, vehicles, and public spaces, offering assessments and direct referrals to housing programs without requiring shelter stays. This low-barrier approach has proven especially effective for engaging chronically homeless individuals, unaccompanied youth, and veterans who may be reluctant to access traditional shelter services. Additionally, emergency hotel and motel funds have been used to bridge the gap for households awaiting placement, helping to reduce the time spent unsheltered.

Families with children continue to be a high priority for Rapid Re-Housing (RRH) programs, which provide short- to medium-term rental assistance and supportive services. These programs have helped families exit homelessness quickly and build the capacity to maintain housing independently. TLCHB monitors returns to homelessness through its HMIS system and has observed a decrease in recidivism among RRH participants who receive comprehensive case management and follow-up services.

For unaccompanied youth, the Zepf Center's Safety Net Program remains a key asset. It operates the only youth-focused emergency drop-in shelter in Lucas County and conducts targeted outreach to youth experiencing or at risk of homelessness. A forthcoming PSH project for youth aging out of foster care, scheduled to begin in 2026, will provide a long-term solution for youth with high service needs.

Despite these gains, several barriers continue to impact the CoC's ability to move people into permanent housing quickly and keep them stably housed. The most significant challenge is the ongoing shortage of affordable rental units in the region. In 2024, for ESG funded project, while 364 households exited homelessness, only 256 were able to secure affordable housing units. This gap reflects a broader issue of supply versus demand, which slows the flow of individuals through the system and increases time spent in shelters or on the streets.

Lastly, funding constraints limit the ability to scale up case management and housing navigation services, both of which are essential for supporting individuals in transitioning to and maintaining housing. To address these challenges, TLCHB is implementing several key improvements. These include advocating for more inclusive eligibility criteria for PSH, supporting affordable housing development efforts, expanding short term RRH capacity, and enhancing data collection to identify trends and target interventions more effectively. The CoC is also participating in a statewide cohort focused on increasing housing stability for transition-age youth and will continue to promote cross-sector collaboration to ensure long-term housing success for all populations.

These collective efforts aim to not only shorten the time individuals and families experience homelessness but also to ensure they are connected to the right supports, remain housed, and ultimately regain independence and stability.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

During the 2023 Program Year Lucas Metropolitan Housing (LMH) accomplished the following:

Strategies:

1. New Strategic Plan

Actions Completed:

In 2024 LMH released its “**Strategic Action Blueprint; Building For The Future**”. This plan is meant to guide the agency from 2024-2028.

Six goals were identified with strategies, tasks noted along with how success would be measured. The Executive Office and Compliance Department, in conjunction with Agency department heads, monitors the progress of the goals, and reports out status results at Board Meetings and within the 5 Year & Annual Plans.

The six goals are as follows:

- i. Invest in Employee Growth and Enhance Workplace Satisfaction
- ii. Increase Income and Pursue Diverse Revenue Streams
- iii. Lead in the Effort to Create Affordable Housing Opportunities in Toledo and the Region
- iv. Streamline Processes and Elevate User Experience and Satisfaction
- v. Launch and Inclusive Communication Strategy to Educate Stakeholders and Foster Community Awareness
- vi. Building Pathways to Family Income Wealth Building and Economic Advancement
- a. In this plan, LMH aligned the above goals to its’ Mission, Vision & Values.
 - i. Mission – To lead in the development and sustainability of housing accessible to all and providing pathways to an enhanced quality of life to empower vibrant communities.
 - ii. Vision – To be a lead partner in creating communities of choice where everyone has a place to call home.
 - iii. Values – Integrity, Influence, Inspiration, Equity, Servant-Leadership, Passion, Respect
2. Portfolio Repositioning Strategy
 - a. Create housing opportunities in existing high opportunity neighborhoods.
 - b. Improve neighborhood conditions to create mixed income communities of choice.

Actions Completed:

- a. LMH has been examining financially viable methods in which to transition some of its Low-Income Public Housing (LIPH) Portfolio to a subsidy platform other than LIPH operating subsidy, while keeping the units affordable at 30% of AGI and ensuring the fiscal health of the agency.

Status: In October 2023 LMH received an award from HUD to enter into a Housing Assistance Payment (CHAP) for TenEck Towers. LMH is working with developer partner Gorman USA to put together a financing plan for the Rental Assistance Demonstration (RAD) conversion of the building. The financing pro forma demonstrated a funding gap. Consequently, the project has been placed on hold until additional funding sources can be identified.

- b. LMH expects to increase the number of apartment units through a combination of new construction, renovation, acquisition, project-based vouchers (PBV), Housing Choice Vouchers, Low-Income Housing Tax Credits and by leveraging funds through the Rental Assistance Demonstration (RAD) program.

Status:

Park Apartments, supportive housing for transition age youth ages 18-24, will wrap up construction in August 2025, with move in is slated for September 15, 2025.

Palmer Gardens financial closing is slated for 4th quarter of 2025.

Thurgood Marshall, housing for seniors, is in the planning states with no specific closing date due to site control challenges.

Mission Point, housing for homeless, is planned as a multifamily building that will provide housing for chronically homeless individuals through a partnership with Cherry Street Mission. This project has received a 9% Low-Income Housing Tax Credit (LIHTC) Award Reservation from OHFA in May 2025. The projected closing is spring 2026 with construction proceeding soon after.

Washington Village, a homeownership opportunity, in collaboration with the city of Toledo, is designing a 5 single family unit housing program for families ready to be homeowners.

Collingwood Green V project, housing for seniors, is currently under construction and will be completed in 2026.

- c. Improve neighborhood conditions and create housing in high opportunity areas, leveraging on capital through public resources, corporate support and private investments."

Status: Partnering with Evergreen Residential Preservation Specialist to renovate Palmer Gardens a 75-apartment family complex located in a high opportunity neighborhood of Toledo Old Orchard. The financial closing date is slated for September 2025.

Collaborated with Family House, an institution that provides housing to homeless families, on a beautification project, including but not limited to litter pick-up throughout the neighborhood, mulching the Family House landscape and planting flowers.

Public Housing community beautification projects throughout LIPH program communities.

Renovations of multiple single-family unit homes throughout the city of Toledo.

- d. Transition to a flexible and reliable financial platform while maintaining and growing the supply of income-based affordable housing.

Status: LMH has begun the implementation of a repositioning and renovation strategy. This includes work being done as part of the Collingwood Green phased development, Weiler Homes and Spieker Terrace renovations, Vistula Manor improvements, McClinton Nunn improvements and the TenEyck Towers RAD conversion.

- e. Renovate our existing housing stock on a Tier Approach to address the unmet capital needs backlog and build new mixed-income communities in all areas.

Status: Capital projects are ongoing at multiple sites, with annual expenditures of \$6-\$8 million. Expenditures are anticipated to increase by \$15million over the next 2 years.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

Lucas Metropolitan Housing has received the designation as a Financial Opportunity Center (FOC). LMH is the first housing authority in Ohio to receive this designation.

- FOCs are on-site career and financial coaching service centers that help families living on low- to moderate-income build effective money habits and focus on the financial bottom line.
- LMH has partnered with LISC to implement a successful model. LISC has over 100 FOCs across the country that are situated within local community organizations. These organizations are known for their exceptional services, convenient location, and trusted reputation. The success of the FOC will rely heavily on ESUSU and employment support.
- FOCs provide employment and career counseling, one-on-one financial coaching and education, and low-cost financial products that help build credit, savings, and assets. They also connect clients with income support such as food stamps, utility assistance, and affordable health insurance. The cornerstone of the FOC model is providing these services in an integrated way—rather than as stand-alone services—and with a long-term commitment to helping clients reach their goals.

Status:

The Financial Opportunity Center Model (FOC) is now a permanent, core LMH service thanks to the partnership with LISC (Local Initiative Support Corporation) Toledo. It's fully institutionalized and expanded across multiple properties.

FOC Highlights:

In 2024, the FOC served 111 residents, delivering over 800 coaching sessions. Notable outcomes included:

- 79 residents were connected to income support, with over half approved and receiving benefits.
- Net worth increased for 29 residents.
- Multiple residents obtained living-wage employment.

The FOC continues to partner with programs such as ESUSU rent reporting, Getting Ahead, Benefits Bridge, and CC2JR, and works closely with Owens Community College, GED providers, and entrepreneurship coaches.

In 2023, LMH hired dedicated financial coaches and an FOC coordinator, allowing expansion to additional developments. The Weiler Homes food pantry is now tied to FOC engagement, and adult education linkages are being strengthened to support economic mobility goals.

Actions taken to provide assistance to troubled PHAs

Lucas Metropolitan Housing (LMH) is not a troubled PHA.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City does not impose any public policies that would present barriers to affordable housing, such as rent controls or impact fees. Instead, the City seeks to maintain inclusionary zoning through policies such as allowing multifamily housing in select residential districts (as well as in commercial and mixed-use districts) and the adoption of flexible zoning regulations for existing inadequate lots to enable infill. While most land in the City has already been developed, zoning regulations consider the ongoing need for inclusionary practices to provide opportunities for the creation of affordable housing.

While hurdles to affordable housing exist, many of these are outside of City control, e.g., higher land costs, and rehabilitation costs in underdeveloped areas of the city can significantly increase development costs and rehabilitation costs to bring units up to code. Additionally, conditions such as population outflow to surrounding suburbs and poor property maintenance can result in the loss of viable housing stock through vacancy and dilapidation. These conditions often disproportionately restrict housing opportunities for LMI individuals and impose higher housing costs, reducing the range of housing choices in many neighborhoods.

Although suitable infrastructure is widely available throughout the city, sustained code enforcement efforts are required to keep the current affordable housing stock in workable condition and stabilize existing neighborhoods. While these initiatives are needed throughout the city, Toledo restricts the use of CDBG funds for code enforcement actions to qualifying low- and moderate-income districts that are in deterioration.

The Department of Housing and Urban Development requires jurisdictions that receive federal dollars, directly or indirectly, to complete an Analysis of Impediments to Fair Housing Choice (AI) as part of the jurisdictions' certification of affirmatively furthering fair housing. The federal Department of Housing and Urban Development and the State of Ohio's Department of Development both prescribe and monitor the AI process. To be eligible for HUD Community Planning and Development formula funding, a jurisdiction must (i) certify its commitment to actively further fair housing choice; (ii) maintain fair housing records; and (iii) complete an Analysis of Impediments to Fair Housing Choice. Partnering with The Fair Housing Center (TFHC), a 2020-2024 Analysis of Impediments (AI) to Fair Housing Choice was completed, and now a 2025-2030 AI has been completed as well. The AI includes action steps for the removal of fair housing obstacles in its Fair Housing Action Plan (FHAP). The COT and TFHC work with community partners in putting the Five-Year FHAP into action.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The City of Toledo (COT) and its partners took several steps during the program year to address barriers that limit access to housing and services for underserved populations. Despite ongoing challenges, including limited resources and local policy constraints, progress was made through both policy initiatives and program delivery.

One significant obstacle arose from Toledo Municipal Code Section 187.12(d) requiring any project that receives \$100,000.00 or more, funded by the City of Toledo to undertake a new process before the City will provide the funding. This new process includes a meeting with the Northwest Ohio Building and Construction Trades Council ("NWOBTC") and entering into Project Labor Agreement (PLA) that requires

negotiations over wages with local unions. While intended to strengthen engagement with local labor organizations, this requirement has created difficulties for nonprofit developers, particularly those working to expand affordable housing or rehabilitate existing units. The Fair Housing Center has recommended amending this ordinance to exempt nonprofits serving historically disinvested area. The City has, so far, not taken this step to amend the local law.

One barrier to the development of affordable housing is the City of Toledo's current zoning code's restrictions on the development of group homes for persons with disabilities. The Fair Housing Center has proposed changes to the zoning code to eliminate this barrier. However, the City has chosen not to adopt The Center's recommendation. The City has received additional grant funds to review local zoning laws for improvements, and The Center hopes this may yield an opportunity to review this issue and make appropriate corrections to the local law.

Beyond regulatory challenges, the greatest obstacle remains the scale of need versus available funding. Demand for affordable housing, community development programs, and basic needs services continues to far exceed resources. Recognizing this, the City prioritized affordable housing as the highest need in its Strategic Plan, while also supporting programs that address fundamental basic needs.

To advance affordable housing, COT promoted owner-occupied rehabilitation, preservation of existing housing stock, and new homeownership opportunities for first-time buyers, seniors, individuals with disabilities, and other special populations. Through the HOME program, multiple initiatives supported both housing stability and foreclosure prevention.

COT also strengthened tenant protections and access to legal resources. In 2023, the Tenant Landlord Services Manager launched community-wide surveys for tenants and landlords. There were two separate surveys, one for landlords and one for tenants. 180 landlords and 456 tenants completed the surveys.

The survey results proved valuable since they were employed by the local housing authority in their strategic planning. Furthermore, the survey was utilized to develop several educational messages for billboards throughout the city, focusing on rent escrow, illegal water shutoffs, and source income discrimination. The billboards were successful in that they sparked conversations throughout the community.

A new concept called "**Tenant Tuesday**" was piloted in October 2023. Tenant Tuesday offered free, private legal counsel to renters in a clinic setting on a myriad of tenant issues, such as living conditions, lease review, eviction sealing, and tenant/landlord obligations, to name a few. Tenant Tuesday was organized in collaboration with Legal Aid of Western Ohio, The Fair Housing Center, Advocates for Basic Legal Equality, Inc., The Toledo Bar Association, and the University of Toledo Law School Legal Clinic, all of whom provided free legal assistance. Sixty-six individuals were serviced at the clinic, and a special clinic on "housing conditions" was established due to the tremendous demand for legal counsel on the subject.

The city has made some progress toward implementing a local source of income discrimination law. The city also made some headway toward enacting a local lead poisoning prevention law, which requires property inspections to protect children from being poisoned in unsafe housing stock. The City has increased funds to the local legal aid agency in order to provide greater representation in court. The City also changed some local laws related to access to water services for tenants with the intent of ensuring better access to water services for tenants.

One important new development has been the creation of a new program by The Fair Housing Center thanks to funding from the City of Toledo. The new program assists tenants with housing conditions issues. One of the most prevalent issues identified in the Analysis of Impediments to Fair Housing Choice was the quality of housing conditions. Many tenants live in substandard conditions with few options for other

housing. The new program provides legal representation for the tenant in filing a rent escrow case in court. The program has already recovered more than \$50,000.00 back for tenants who faced substandard conditions and ensured the provision of safe habitable housing for residents.

The COT and TFHC continue to work with community partners on the implementation of the Five-Year Fair Housing Action Plan (FHAP). The Fair Housing Action Plan provides quarterly and annual updates on the action steps that are undertaken to address barriers to housing choice identified in the 2020-2024 Analysis of Impediments. (Please see the Fair Housing Action Plan for more detailed information in the attachments)

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The COT uses a network of health officials, community development corporations, public housing entity, social service agencies, and other city departments to reduce lead-based paint hazards. The effort targets central city neighborhoods where low-income families occupy two of every three residential units, and the concentration of pre-1978 structures containing lead paint is estimated to exceed 85 percent.

The Department of Housing and Community Development (DHCD) housing programs utilize hazard control methods to ensure units are lead-safe, including low-level interventions, interim controls, and hazard abatement. Abatement is the city's preferred method of addressing paint surfaces; however, the programs do not perform full abatement but rather the replacement of specific components and systems. Therefore, units are made lead-safe but not lead-free (**please see the definition of lead-safe following this section**).¹

The DHCD receives funding to administer dedicated lead-based paint hazard control activities through the Lead-Based Paint Hazard Control Grant program. Funding sources include the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH), which includes both the Lead Hazard Reduction grant as well as the Healthy Homes and Weatherization Coordination Demonstration Grant (HHWCD), the Toledo-Lucas Regional Health District Cenovus-EPA settlement, the Ohio Department of Development (ODOD) and the Community Development Block Grant for supplemental funding on high-cost units.

During the PY 2024 reporting period, the DHCD continued to administer two OLHCHH grants along with two remaining dedicated lead-based paint hazard control funding sources.

Aggregate results from the dedicated lead-based paint hazard control activities during PY 2024 included 37 additional eligible units enrolled, 86 units having received a comprehensive Lead Inspection/Risk assessment and 43 units achieving lead clearance (18 owner-occupied and 25 rental). This equates to a total of \$1,251,406.00 investment into the community, assisting 42 households, 24 children under the age of six in providing a lead-safe environment; additionally, 38 persons between the ages of 6-17 years of age and 58 persons 18 years of age and above were also positively impacted with a lead-safe unit in which to reside, with an average household income of 31.6% AMI.

The DHCD's lead program must still comply with Toledo Municipal Code Section 187.12(d) requiring the successful bidder of a public improvement contract of \$100,000 or greater, which is funded by the City of Toledo or other sources that do not exclude Project Labor Agreements ("PLA"), to enter into a PLA with the Northwest Ohio Building and Construction Trades Council ("NWOBTC"). The bidding documents for each such public improvement or private improvement funded in whole or in part by the City of Toledo shall contain a written provision requiring the successful bidder, and all the bidder's contractors and subcontractors, to comply with and adhere to all of the provisions of the project labor agreement negotiated by the Parties for the project. The City Administration is requiring prevailing wage and/or union labor agreements for the DHCD's current Lead Licensed contractors and also for any the third-party that would contract with lead-based paint hazard control program. The DHCD continues to develop expeditious

ways to respond to the PLA requirements including a full revision of the current policy and procedure model for the LBPHC program.

The DHCD also provides ancillary lead-based paint hazard control activities through its other housing programs as well. The DHCD administers owner-occupied rehabilitation, rental rehabilitation, the Lead Based Paint Hazard Control grant program (LBPHC), and CHDO programs, which are required to incorporate lead inspections and/or assessments on any unit the DHCD evaluates. For rehabilitation projects, properties with lead hazards utilize component abatement, interim controls, standard practices, or lead-safe work practices. State-licensed lead abatement contractors and personnel, along with Certified Lead Renovation, Repair, and Painting contractors are used in accordance with federal regulations. All units are required to pass a final lead clearance examination upon completion of all work. For PY 2024, the DHCD continued to conduct Housing Quality Standard (HQS) inspections ensuring compliance with 24 CFR 982.401, for 534 units that were performed by licensed Lead Risk Assessors.

In PY 2024, the DHCD was able to make one owner-occupied unit lead-safe through the HOME-funded Owner-Occupied rehabilitation program. Homes awarded down-payment assistance through HOME funds were inspected for lead. Results of assessments and actions needed to meet city, state, and federal regulations require that the dwelling meet minimum property standards, and no deteriorated paint in excess of the following was found: 20 sq. ft. of exterior or 2 sq. ft. of interior surface, or 10 percent or more of any building component with a small surface painted area. In PY2024, 52 Down Payment Assistance grants were provided, with 52 lead visual assessments completed.

In addition to the efforts of the DHCD to reduce lead-based paint hazards, the COT revised and passed a new Lead-Safe Ordinance in September 2020. Under this Ordinance, 1-4-unit residential structures and family child care homes built prior to 1978 are to undergo and pass a lead clearance, which includes a visual and dust-wipe inspection, and register to receive a lead-safe certificate. To date, 4,325 units are complying out of approximately 30,000-40,000 estimated affected units. The ordinance activities will also generate a lead-safe unit registry to be developed and maintained by the Lucas County Regional Health District.

¹Criterion for the definition of Lead-Safe is: at the time of the lead clearance inspection by a state licensed lead assessor, the property contained no lead hazards. Lead-Safe does not mean that all lead paint has been eliminated from the property. Criteria for designating a Lead-Safe unit includes: no visible paint chips or dust, all painted surfaces were visibly intact and windows were replaced or repaired. Additionally, dust wipes samples were collected and the lab results were in compliance with the state regulations of safe lead levels.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The Consolidated and Action Plans aim to reduce poverty in Toledo by helping individuals and families achieve stability through education, income growth, and healthier lives. The Department of Housing and Community Development (DHCD) supports housing initiatives that strengthen households by promoting economic opportunity, family stability, health improvements, homeownership, and overall community growth.

In addition, DHCD administers non-housing programs that encourage business creation and job retention in sectors such as construction, finance, and entertainment. These efforts not only support economic development but also make Toledo more attractive for future business and residential investment.

DHCD also works in partnership with institutions such as ProMedica, Mercy Hospital, and community development corporations to concentrate resources in low-income and distressed neighborhoods, ensuring that programs reach the areas of greatest need.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The Department of Housing and Community Development manages all aspects of the HUD grant programs and recognizes the need to maintain a high level of coordination on projects involving other City departments and/or organizations. This collaboration assures efficient use of resources and optimal accomplishments.

The COT will continue to coordinate efforts with partners, including:

- Toledo-Lucas County Homelessness Board (TLCHB)
- Toledo-Lucas County Plan Commission
- United Way of Greater Toledo
- Lucas Metropolitan Housing (LMH)
- Mental Health and Recovery Services Board of Lucas County
- Lucas County Board of Developmental Disabilities
- Ohio Means Jobs/Lucas County
- Lucas County Land Bank
- Toledo-Lucas County Health Department
- Toledo-Lucas County Port Authority
- Toledo Public Schools
- The Fair Housing Center (TFHC)

Each of the City of Toledo's partners brings specialized service components and experience. A continued commitment to these partnerships and collaborations is critical to achieving the desired outcomes for the community. Many relationships exist among the business community, faith-based organizations, public service entities, housing providers, foundations, and other community organizations that advocate on behalf of those in need. Increased communication with all community stakeholders will continue.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The COT will continue to work with a broad cross-section of public, private, faith-based, and community organizations to identify the needs of its residents. By continuing to collaborate with the CoC and the community, the city will continue to streamline the actions of public service agencies to improve the lives of all persons in Toledo. These groups address a broad range of needs for families, including homelessness, workforce development, and community health.

Regarding public housing, LMH enhances coordination between public and private housing with other social service agencies in several ways, including a continued relationship with its Program Coordinating Council community partners and the Network/Zepf, Toledo Public Schools, and Toledo-Lucas County Public Library.

In addition, LMH has designed a strategy that moves low-income public housing residents toward self-sufficiency. In partnership with Local Initiatives Support Corporation (LISC), LMH is developing a Financial Opportunity Center (FOC) that will provide career and financial coaching to help families living on a low- to moderate-income focus on financial stability and spending habits.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The city has made some progress toward implementing a local source of income discrimination law. Most recently, the City provided a grant to The Fair Housing Center for it to conduct Source of Income Discrimination fair housing testing through its testing program. This has allowed The Center to identify cases of source of income discrimination and a report to the City about the prevalence of this issue. However, the City must create the internal systems for complaint filing and investigation to enforce the local law.

The City also took significant action to reduce childhood lead poisoning with its local lead poisoning prevention law, which requires property inspections to protect children from being poisoned in unsafe housing stock. The City won a significant battle in court to ensure it is allowed to enforce this law and retained staff to begin enforcement.

The City also changed some local laws related to access to water services for tenants with the intent of ensuring better access to water services for tenants. However, the City must ensure enforcement of this law and greater public knowledge of these rules.

One important new development has been the creation of a new program by The Fair Housing Center thanks to funding from the City of Toledo. The new program assists tenants with housing conditions issues. One of the most prevalent issues identified in the Analysis of Impediments to Fair Housing Choice was the quality of housing conditions. Many tenants live in substandard conditions with few options for other housing. The new program provides legal representation for the tenant in filing a rent escrow case in court. This program continues to be highly successful and is directly aligned with the City's consolidated plan.

The COT and TFHC continue to work with community partners on the implementation of the Five-Year Fair Housing Action Plan (FHAP), and will continue to do so with the new 2025-2030 plan. (Please see the Fair Housing Action Plan for more detailed information in the attachments)

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The DHCD oversees compliance for CDBG, ESG, HOME, LEAD, and NSP programs. Written agreements are executed with all partners and beneficiaries to ensure that projects are both eligible and consistent with HUD regulations.

Monitoring is carried out on a monthly basis, or more frequently if needed, to confirm that partners remain in compliance with program requirements. Reviews include financial management, ongoing operations, program eligibility, performance outcomes, procurement practices, and board governance. DHCD uses Progressive Corrective Actions (PCAs) as a structured tool to bring subrecipients into compliance when deficiencies are identified.

Each month, Third-Party Partners (TPPs) are required to electronically submit the following documentation through the City's online system, ZoomGrants:

- Tracking Sheets (completed online)
- Daily Activity Reports
- Financial Documents (bank statements, financial balance sheets, and reconciliation statements)
- Request for Funds, including timesheets
- Board of Director minutes & signed roster

In addition, a Program Monitoring Specialist conducts monthly onsite visits to review client files, financial records, and other documents relevant CDBG- and ESG-funded activities. Findings are documented using a standardized "Monitoring Tool", which verifies accuracy and evaluates compliance in the following areas:

- Drawdowns
- Administrative documents, including Financial Audits
- Monthly reports (performance, financial, and board documentation)
- Internal Controls
- Taxes and Financial documentation
- Activities, objectives and outcome verification
- Progressive Corrective Action (when applicable)
- Match proof and supporting documentation
- Program Income (if applicable)
- Overall evaluation results

On a quarterly basis, TPPs are required to submit electronic updates regarding their fundraising activities. Following review of all submission and onsite monitoring, the Program Monitoring Specialist issues quarterly monitoring reports assessing the subrecipient's performance and compliance as a whole. Where non-compliance is identified, a TPP must submit a Corrective Action Plan to ensure timely resolution.

Twice a year, TPPs must also submit proof of property and payroll tax payments, as well as beautification reports when applicable. These submissions provide an additional layer of accountability regarding both fiscal compliance and programmatic outcomes.

Desk audits are also conducted as needed.

To further strengthen compliance, DHCD requires all subrecipients to attend quarterly mandatory trainings. These sessions provide instruction on HUD regulations, City policies and procedures, and the use of the ZoomGrants system for reporting and reimbursement requests. An orientation is also offered to all new TPPs, as well as any existing partners seeking additional support.

All CDBG- and ESG-funded subrecipients receive the updated Third-Party Partners Manual. This document outlines DHCD's policies and procedures and provides detailed guidance on HUD compliance requirements. The manual serves as a critical reference tool for agencies as they carry out their funded activities.

Monitoring is a key tool that the Housing Division uses to evaluate their operating procedures and systems and those of their housing partners. The Housing Compliance Manager, with the support of the Neighborhood Development Specialists (NDSs), monitors housing development projects that are funded by HOME on an annual basis. Two key mechanisms to ensure long-term compliance include the HOME written agreement and restrictive covenants. Both Rental Development and Owner-Occupied Rehabilitation projects are monitored annually during the affordability period. Owners of rental housing must provide annually to the City of Toledo information on rents and occupancy of HOME-assisted units to demonstrate compliance with 92.252. Subsequently, other HOME requirements that are monitored and that apply throughout the period of affordability for rental properties include:

- Income-eligibility of tenants;
- Maintaining unit mix;
- Affirmative marketing;
- Marketing accessible units to disabled tenants or applicants (if applicable);
- Tenant rights and protections;
- Tenant selection;
- Ongoing property standards; and
- Financial oversight for projects with ten or more units.

Additionally, ongoing periodic inspections of HOME-assisted rental housing must be performed to determine compliance with the property standards of 92.251 and on-site inspections under 92.251. An onsite inspection must occur at least once every three (3) years throughout the period of affordability. The minimum requirement is that four units must be inspected for all projects that have up to twenty units.

The goal of the Owner-Occupied Rehabilitation program is to ensure that any homeowner unit assisted meets code standards and promotes the longevity of the repairs. Although there are no long-term affordability or occupancy requirements from HUD associated with rehabilitation assistance to owner-occupants, the city has elected to impose the below-noted requirements:

- On an annual basis and for a period of ten (10) years, the DHCD will perform an AREIS verification check in May. The document will be initialed, dated, and placed in the appropriate client file. If there is a discrepancy, the AREIS verification will be placed in the Housing Compliance Manager's mailbox for further investigation.
- For each year of continued ownership and use as a primary residence by the beneficiary, the mortgage is forgiven in an amount not to exceed 1/10th of the assistance amount.
- If, prior to the first anniversary of the mortgage note, the housing unit is sold or transferred or the owner-occupant ceases to use the residence as their primary residence, then the principal balance of the note shall be due and payable in full.

Other uses of monitoring include tracking progress and production to ensure timely use of public funds; holding recipients accountable for compliance with requirements; providing feedback to improve program design and management; and training staff and program partners.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City of Toledo (COT) follows the procedures outlined in its Citizens Participation Plan (CPP) to ensure residents are informed and have the opportunity to review and comment on all documents related to the CAPER.

For each CAPER, the CPP requires a minimum of one public hearing, with notices issued at least fifteen (15) days in advance. Notices include information on where the DRAFT CAPER is available for review. For the 2024–2025 CAPER, the draft was posted on the City’s website, the websites of key local service providers, and made available at the main Toledo-Lucas County Public Library and branches upon request.

Residents were invited to provide input and comments for a 15-day period. The City encouraged feedback on program achievements, fund allocation and expenditure, and opportunities to propose initiatives or ask questions.

Public notices were placed in three periodicals: The Blade, Sojourners Truth, and La Prensa, the latter two targeting African-American and Hispanic/Latino audiences, respectively. In addition, a press release was issued to local media, and notices were sent to all Third-Party Partners (TPPs).

The public hearing will be held in a fully accessible location, City Council Chambers, at 5:30 p.m., accommodating residents working standard business hours. Attendees are given the opportunity to ask questions and provide comments during the hearing.

Timeline for Citizen Comments on the DRAFT CAPER:

- 08/01/2025: Public notice sent to The Blade, Sojourners Truth, and La Prensa
- 08/06/2025: Notice published in The Toledo Journal and La Prensa
- 08/10/2025: Notice published in The Blade
- 08/11/2025: Notice posted on City website
- 08/14/2025: Press release issued; emails sent to TPPs and local organizations
- 08/25/2025: DRAFT CAPER emailed to designated locations for website posting
- 08/27/2025: 15-day public comment period begins
- 09/04/2025: Public hearing on DRAFT CAPER at 5:30 p.m.
- 09/10/2025: Public comment period ends

Copies of the public notices, along with a summary of the public hearing and citizen comments, are included in the attachments to this document.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

In PY 2019, PY 2020, PY 2021, PY2022, and through PY 2024, the Coronavirus and subsequent variants are still having an impact on the COT and its residents. As a result, the COT continues to evaluate its program objectives and activities. The added funding of the CARES Act has been essential in meeting new and challenging needs in the community while the annual CDBG funds provide continued access to services for the most vulnerable residents.

As of PY 2024, the city expended \$**5,184,944** of CDBG-CV, while the ESG-CV funding has been fully spent. The city of Toledo staff is monitoring the COVID activities to ensure that all funds will be expended according to the HUD-required expenditure deadlines.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 24 CFR 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

The following housing developments received on-site inspections by the Division of Housing during the 2024 program year (due to scheduling and/or timing some projects were inspected twice):

Mercy Outreach Ministries: units – 6325 Nebraska 2A, 6325 Nebraska 2D, 1149 Shadow 1A, 1149 Shadow 1B; **New Town Apartments:** units – 1019 Dorr, 931 Dorr, 1029 Dorr, 715 Dorr, 1111 Dorr, 1121 Dorr; **SETH I:** units – 317 Dearborn, 573 Viking, 515 South, 835 Utah; **SETH II:** units – 637 South, 968 Kingston, 210 Sumner, 1205 Ironwood; **Oakwood Homes III:** units – 1435 Foster, 1817 Lawrence; **Oakwood Homes IV:** units – 1463 Norwood, 1625 Norwood, 1265 Palmwood, 1307 Palmwood, 1311 Palmwood; **YWCA:** units – #506, #1B, #3I, #402; **Cherry Legacy:** units – 102 Delaware, 3008 Fulton; **West Central Homes:** units – 635 Palmwood, 1361 Fitchland; **Pilgrim Port:** units – 4545 Angola #004, #029, #041, #050; **Chestnut Hill:** units – 1127 Champlain #107, #202, #309; **Englewood Senior Housing:** units – 2737 Monroe #210, #301, #311; **St. Hedwig:** units – 300 Bronson #100B, 203B; **Palmer Gardens:** 2716 Wayman Palmer #02-007, 2756 Wayman Palmer #06-029, 2807 Wayman Palmer #09-051, 2733 Wayman Palmer #11-064, 2711 Wayman Palmer #13-076; **Ottawa River Estates:** 2006 Abygail Trail A, 2018 Abygail Trail A, 2042 Abygail Trail A, 4638 David's Creek A; **Ottawa River Estates (scattered):** units – 2938 E. Lincolnshire A, 2938 E. Lincolnshire C; **ROOST I:** units – 1623 Copley B, 4325 Holly Hill A, 4325 Holly Hill D; **ROOST II:** 5107 Adella C, 2653 Nash C; **REACH:** units – 201 Northgate C, 5615 Parkstone B, 5615 Parkstone A; **Secor Senior Lofts:** units – 3839 Secor #106, #202, #303, #214, #414; **Parqwood Apartments:** units – 2125 Parkwood #223, #328, #348, #114; **Collingwood Green I:** units – 800 Division #208, #303, #417, #310; **Collingwood Green II:** units – 731 Rogan #8, 734 Division #7, 354 Belmont #4, 828 Rogan #1; **Collingwood Green III:** units – 732 Rogan Way, 352 Addie Way, 360 Addie Way, 725 Clemente, 722 Division, 363 Addie Way; **Secor Senior Lofts:** units – 3839 Secor #106, #202, #303, #214, #414; **Ottawa River Estates (scattered):** units – 2938 E. Lincolnshire A; **Palmer Gardens:** units – 2716 Wayman Palmer #02-008, 2722 Wayman Palmer #03-016, 2734 Wayman Palmer #04-021, 2752 Wayman Palmer #05-028, 2809 Wayman Palmer #08-042, 2711 Wayman Palmer #13-071; **St. Hedwig:** units – 300 Bronson #102, #202, #307; **Chestnut Hill:** units – 1127 Champlain #107, #202, #309; **Legacy Hills:** units – 4454 Hill CG04, #C103, C202, C205; **New Town Apartments:** units – 1019 Dorr, 931 Dorr, 1029 Dorr, 715 Dorr, 1111 Dorr, 1121 Dorr; **Mercy Outreach Ministries:** units – 6325 Nebraska 2A, 6325 Nebraska 2D, 1149 Shadow 1A, 1149 Shadow 1B; **West Central Homes:** units – 1452 Oakwood, 1361 Fitchland; **Oakwood Homes III:** units – 1435 Foster, 1817 Lawrence; **Oakwood Homes IV:** units - 1463 Norwood, 1625 Norwood, 1265 Palmwood, 1307 Palmwood, 1311 Palmwood; **Cherry Legacy:** units – 102 Delaware, 3008 Fulton; **SETH II:** units – 637 South, 968 Kingston, 210 Sumner, 1205 Ironwood; **SETH I:** units - 317 Dearborn, 575 Viking, 515 South, 835 Utah; **Parqwood Apartments:** units - 2125 Parkwood #102, #213, #323, #322; **Ottawa River Estates:** units - 2006 Abygail Trail B, 2030 Abygail Trail B, 2052 Abygail Trail B, 4656 David's Creek B; **Pilgrim Port:** units – 4545 Angola #010, #020, #030, #040; **Covenant House:** units - 702 N. Erie #103, #611, #608, #804, #119; **ROOST I:** units – 1623 Copley C, 4325 Holly Hill B, 4325 Holly Hill C; **ROOST II:** units – 5107 Adella C, 2653 Nash B; **REACH:** units – 201 Northgate B, 5616 Parkstone A, 201 Northgate A; **Bridge Point Senior Village:** units – 2005 Abygail #2, #3, #5, #8, #9, #11; **Englewood Senior Housing:** units – 2737 Monroe #103, #206, #302, #312; **Woodside Village Apartments:** units – 1045 Brookview #01, #05, #11; **Valley Bridge Senior Housing:** units – 5351 Nebraska – units #107, #118, #323; **YWCA:** units - #503, #1B, #1F, #402; **United North Schools I:** units – 918 Baker, 922 Moore, 917 Moore, 824 Page; **Collingwood Green I:** units – 800 Division #206, #300, #417, #418; **Collingwood Green II:** units – 354 Belmont #4, 802 Rogan #4, 744 Rogan #9, 344 Belmont #3; **Collingwood Green III:** units – 360 Addie Way, 352 Addie Way, 731 Clemente Trace, 395 Addie Way, 722 Division, 363 Addie Way; **Brookview Gardens:** units – 1119 Hilltop #3m 5736 Staghorn #3, 1051 Brookview #4.

The following housing developments still need to be inspected – owners to receive letters, certified letters and/or emails:

New Cheney Flats

Lucas Housing Services Corporation – 1442 N. Huron, 1453 N. Huron,
Bluff Street Tiny Village – 3560 Bluff, 3564 Bluff

The COT conducts onsite inspections at least once every three years during the period of affordability (CFR92.504 (c)(6)(d)(iii)). HOME property standards also apply to common areas and the building exterior.

Frequency of inspections. The participating jurisdiction must perform an on-site inspection within 12 months after project completion and complete one of the following every 3 years during the period of affordability:

(A) Perform an on-site inspection in accordance with the participating jurisdiction's inspection procedures to determine compliance with the property standards; or

(B) Accept a determination made within the past 12 months in satisfaction of another funding source's requirements, that the HOME-assisted project and units are decent, safe, sanitary, and in good repair in an inspection conducted under the National Standards for the Condition of HUD housing ([24 CFR part 5, subpart G](#)) or an alternative inspection standard, which HUD may establish through Federal Register publication. If a participating jurisdiction is accepting a determination, then the participating jurisdiction must document the determination in accordance with [§ 92.508\(a\)\(3\)\(iv\)](#) and is not required to perform an on-site HOME inspection of the project and the units for compliance with [24 CFR 5.703](#).

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

The DHCD Division of Housing will continue to follow its affirmative marketing for HOME units, which includes following its Affirmative Fair Housing Marketing Policy (AFHMP) developed in response to HUD's July 16, 2015 final rule requiring all partners, i.e., Community Housing Development Organizations (CHDO), non-profit entities, for-profit entities, and sub-recipients, to develop and utilize a marketing plan that includes Fair Housing Standards.

The policy was designed to promote good-faith efforts by Housing's partners and/or subrecipients to identify and attract those persons "least likely to apply" for housing and/or services or who are underrepresented within a neighborhood community.

A partner, most likely a developer, sponsor, or owner of a project, describes what efforts they will make to attract those protected classes who might not normally seek housing in their project. This is required as part of the DHCD's formal underwriting process. This is in effect for both homebuyer and rental projects.

At a minimum for projects containing five (5) or more HOME-assisted housing units, the COT requires the following:

- Prior to sales/rental activity, the partner or subrecipient shall identify and target individuals, organizations or agencies within the community that are involved with serving low-income persons who benefit from special outreach efforts;
- The Equal Housing Opportunity logo will be included in all public advertisements for rental units advertised during the period of affordability;

- Utilization of media sources that advertise to a particular audience (e.g., newspapers that serve protected classes);
- All partners and/or subrecipients must display the HUD fair housing poster in an area accessible to the public;
- All partners (or authorized agent) must collect information on the race and ethnicity of each program applicant (demonstration of results to be made available upon request); and
- All partners (or authorized agents) of rental projects must maintain information demonstrating compliance with the above five bullets throughout the period of affordability, making such information available to COT housing staff during onsite inspections.

As part of the annual review for all rental units, Housing staff will be reviewing affected projects for evidence of the following:

1. Copies of correspondence with any individual, organization, or agency whose membership consists of primarily protected class members;
2. Copies of advertisements on behalf of particular audiences;
3. Information on how the project does/will provide accommodations for persons with disabilities; and
4. Current policies or notices for referrals of housing complaints and/or questions to its agency contact and/or the Toledo Fair Housing Center (TFHC).

In an effort to ensure compliance with and proper implementation of its AFHMP, the Division of Housing maintains an active partnership with the TFHC. This is to guarantee proper understanding among city staff and enforcement of the implementation of marketing practices for all projects supported by HOME. It also provides for standard practices and consistency of treatment among all housing partners. At this juncture, no immediate effects of the policy require changes, but staff maintains active communication with the TFHC to strengthen the connection between written marketing policies and the actions of partners.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The Division of Housing drew down **\$452,412.99** in HOME Program Income (PI) for the period July 1, 2024 through June 30, 2025. The PI drawn supported **52** projects under the HOME At Last – Down Payment Assistance Program (DPA) and **1** (one) Owner-Occupied (OO) project.

Down Payment Assistance is offered to first-time home buyers whose income falls below the 80% AMI threshold and participants are eligible for up to \$7,500 towards the purchase of a home in Toledo, Ohio. Additionally, if the home is in a designated target neighborhood the participant can be eligible for up to \$9,500 of assistance.

IDIS#	Project	Amount	#Persons	Race	Hispanic	Family Type	AMI
5675	DPA	\$9,336.41	3	AA	NO	SINGLE PARENT	60-80%
5726	DPA	\$8,986.41	2	W	NO	SINGLE PARENT	50-60%
5727	DPA	\$7,672.35	1	W	NO	NON-ELDERLY SINGLE	60-80%
5728	DPA	\$9,336.41	4	W	NO	SINGLE PARENT	50-60%
5729	DPA	\$9,336.41	3	W	NO	OTHER	60-80%
5730	DPA	\$11,336.41	1	AA	NO	NON-ELDERLY SINGLE	60-80%
5745	DPA	\$9,336.41	2	W	NO	SINGLE PARENT	60-80%
5746	DPA	\$8,855.71	1	AA	NO	NON-ELDERLY SINGLE	60-80%
5747	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	60-80%
5748	DPA	\$8,897.97	1	W	NO	NON-ELDERLY SINGLE	60-80%
5749	DPA	\$9,336.41	1	AA	NO	NON-ELDERLY SINGLE	50-60%
5750	DPA	\$9,336.41	2	W	NO	SINGLE PARENT	50-60%
5751	DPA	\$9336.41	3	AA	NO	SINGLE PARENT	60-80%
5752	DPA	\$9,243.70	3	AA	NO	SINGLE PARENT	60-80%
5753	DPA	\$8,049.49	4	AA	NO	SINGLE PARENT	30-50%
5754	DPA	\$8,336.41	1	W	NO	NON-ELDERLY SINGLE	30-50%
5755	DPA	\$9,336.41	3	AA	NO	SINGLE PARENT	60-80%
5756	DPA	\$9,336.41	2	AA	NO	OTHER	50-60%
5757	DPA	\$6,706.72	2	W	NO	OTHER	60-80%
5758	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	50-60%
5759	DPA	\$5,760.07	3	AA	NO	SINGLE PARENT	30-50%
5760	DPA	\$9,336.41	3	AA	NO	TWO <u>PARENT</u>	50-60%
5761	DPA	\$9,336.41	2	AA	NO	SINGLE PARENT	60-80%
5762	DPA	\$9,336.41	3	AA	NO	SINGLE PARENT	50-60%

5763	DPA	\$11,066.41	3	AA	NO	SINGLE PARENT	60-80%
5767	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	30-50%
5768	DPA	\$9,336.41	1	AA	NO	NON-ELDERLY SINGLE	60-80%
5770	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	30-50%
5771	DPA	\$9,336.41	3	AA	NO	SINGLE PARENT	30-50%
5772	DPA	\$9,336.41	5	AA	NO	SINGLE PARENT	60-80%
5773	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	60-80%
5776	DPA	\$9,336.41	1	AA	NO	NON-ELDERLY SINGLE	60-80%
5777	DPA	\$9,336.41	3	AA	NO	SINGLE PARENT	60-80%
5778	DPA	\$9,336.41	2	AA	NO	SINGLE PARENT	60-80%
5779	DPA	\$9,336.41	4	AA	NO	SINGLE PARENT	50-60%
5781	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	60-80%
5782	DPA	\$9,336.41	2	W	NO	OTHER	30-50%
5783	DPA	\$7,488.41	3	W	NO	NON-ELDERLY SINGLE	30-50%
5784	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	60-80%
5785	DPA	\$9,336.41	1	AA	NO	NON-ELDERLY SINGLE	60-80%
5786	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	60-80%
5787	DPA	\$9,336.41	1	AA	NO	NON-ELDERLY SINGLE	60-80%
5788	DPA	\$9,336.41	3	AA	NO	NON-ELDERLY SINGLE	30-50%
5789	DPA	\$9,336.41	2	AA	NO	NON-ELDERLY SINGLE	50-60%
5793	DPA	\$9,336.41	1	AA	NO	NON-ELDERLY SINGLE	50-60%
5794	DPA	\$9,336.41	1	Alaskan/W	YES	NON-ELDERLY SINGLE	60-80%
5795	DPA	\$9,336.41	5	AA	NO	SINGLE PARENT	60-80%
5796	DPA	\$7,550.41	1	AA	NO	ELDERLY	30-50%
5797	DPA	\$9,336.41	2	AA	NO	SINGLE PARENT	30-50%

5798	DPA	\$9,336.41	3	W	NO	SINGLE PARENT	50-60%
5799	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	60-80%
5801	DPA	\$9,336.41	2	W	NO	NON-ELDERLY SINGLE	60-80%
5802	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	60-80%
5804	DPA	\$9,336.41	1	W	NO	NON-ELDERLY SINGLE	50-60%
5806	DPA	\$9,336.41	3	B	NO	NON-ELDERLY SINGLE	30-50%
5807	DPA	\$9,336.41	2	B	NO	NON-ELDERLY SINGLE	60-80%
5808	DPA	\$9,336.41	3	W	NO	NON-ELDERLY SINGLE	60-80%
5809	DPA	\$9,336.41	3	W	NO	NON-ELDERLY SINGLE	50-60%

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)

In PY 2023, DHCD continued to work with projects selected in the PY 2022 NOFA to move them to permitting and finance closing. Toledo City Council approved \$10,000,000 of ARPA gap financing for the Glen and Grand Family Housing, Collingwood Green V Senior Housing, and the YWCA Non-congregate shelter projects, for a total of 167 units. These three ARPA-subsidized projects include 4% LIHTC in their respective capital stacks. It is anticipated that these three projects will close by the end of 2024.

In addition to commitments of ARPA gap funding, Toledo has provided conditional commitments of \$10,200,000 of U.S. Treasury Emergency Rental Assistance (ERA 2) funds for the Thurgood Marshall adaptive reuse senior project, the Park Hotel permanent supportive housing for youth aging out of foster care, and recapitalization of the Toledo Heritage Village scattered site portfolio, for a total of 283 units. The Park Hotel Project has received a 9% LIHTC competitive award. The Thurgood Marshall senior project and Toledo Heritage Village projects will be submitting applications in September 2023 for Ohio Housing Finance Agency (OHFA) Bond gap financing and 4% LIHTC. These projects are also expected to close in 2024.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

Table 15 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.					

Table 16 – Qualitative Efforts - Number of Activities by Program

Narrative

The city of Toledo has been striving to ensure that the updated regulations are applied in Section 3 covered projects ever since the Section 3 Rule changed from 24 CFR Part 135 to 24 CFR Part 75. For Section 3 and Targeted Section 3 Benchmarks, the city will strive to gather the pertinent data.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps* For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	TOLEDO
Organizational DUNS Number	099962052
UEI	
EIN/TIN Number	346401447
Identify the Field Office	COLUMBUS
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Toledo/Lucas County CoC

ESG Contact Name

Prefix	Ms
First Name	Monica
Middle Name	
Last Name	Brown
Suffix	
Title	CPD Grants Manager

ESG Contact Address

Street Address 1	One Government Center
Street Address 2	Suite 1800
City	Toledo
State	OH
ZIP Code	43604
Phone Number	4192451617
Extension	
Fax Number	4192451192
Email Address	monica.brown@toledo.oh.gov

ESG Secondary Contact

Prefix	Ms
First Name	Rosalyn
Last Name	Clemens
Suffix	
Title	Director
Phone Number	4192451400
Extension	
Email Address	rosalyn.clemens@toledo.oh.gov

2. Reporting Period—All Recipients Complete

Program Year Start Date	07/01/2024
Program Year End Date	06/30/2025

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: BEACH HOUSE FAMILY SHELTER, INC.

City: Toledo

State: OH

Zip Code: 43604, 1605

DUNS Number: 167489699

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 145,000

Subrecipient or Contractor Name: Toledo Community Service Center

City: Toledo

State: OH

Zip Code: 43604, 8005

DUNS Number: 151420122

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 150,000

Subrecipient or Contractor Name: ST. PAUL'S COMMUNITY CENTER

City: Toledo

State: OH

Zip Code: 43604, 5443

DUNS Number: 155295272

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 125,000

Subrecipient or Contractor Name: UNITED WAY OF GREATER TOLEDO

City: Toledo

State: OH

Zip Code: 43604, 1410

DUNS Number: 020261681

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 57,946.82

Subrecipient or Contractor Name: Toledo Lucas County Homelessness Board

City: Toledo

State: OH

Zip Code: 43604, 7258

DUNS Number: 941590114

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 168,482.18

CR-65 - Persons Assisted

DATA in this section is reported through SAGE and is included in the attachments of this CAPER.

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 17 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 18 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 19 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 20 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 21 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	
Female	
Transgender	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 22 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	
18-24	
25 and over	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 23 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans				
Victims of Domestic Violence				
Elderly				
HIV/AIDS				
Chronically Homeless				
Persons with Disabilities:				
Severely Mentally Ill				
Chronic Substance Abuse				
Other Disability				
Total (unduplicated if possible)				

Table 24 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

DATA in this section is reported through SAGE and is included in the attachments of this CAPER.

8. Shelter Utilization

Number of New Units – Rehabbed	
Number of New Units – Conversion	
Total Number of bed - nights available	
Total Number of bed - nights provided	
Capacity Utilization	

Table 25 – Shelter Capacity

9. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

Please see Indicator Snapshots regarding outcomes in the attachments. Please note not all project types have a standard since there is only a limited impact that a project type can have on the indicator or the indicator is not applicable.

CR-75 – Expenditures

DATA in this section is reported through SAGE and is included in the attachments of this CAPER.

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2022	2023	2024
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Prevention under Emergency Shelter Grants Program			
Subtotal Homelessness Prevention			

Table 26 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2022	2023	2024
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Assistance under Emergency Shelter Grants Program			
Subtotal Rapid Re-Housing			

Table 27 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2022	2023	2024
Essential Services			
Operations			
Renovation			
Major Rehab			
Conversion			
Subtotal			

Table 28 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2022	2023	2024
Street Outreach			
HMIS			
Administration			

Table 29 - Other Grant Expenditures**11e. Total ESG Grant Funds**

Total ESG Funds Expended	2022	2023	2024

Table 30 - Total ESG Funds Expended**11f. Match Source**

	2022	2023	2024
Other Non-ESG HUD Funds			
Other Federal Funds			
State Government			
Local Government			
Private Funds			
Other			
Fees			
Program Income			
Total Match Amount			

Table 31 - Other Funds Expended on Eligible ESG Activities**11g. Total**

Total Amount of Funds Expended on ESG Activities	2022	2023	2024

Table 32 - Total Amount of Funds Expended on ESG Activities



Citizen Participation

**PUBLIC NOTICE
CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
for
2024 Program Year – July 1, 2024 to June 30, 2025**

The City of Toledo (COT) is directed by the U.S. Department of Housing and Urban Development (HUD) to notify the general public of the undertakings, activities, and accomplishments completed in and at the close of each Program Year through a Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER provides an assessment of the federally funded programs administered by the COT's Department of Housing and Community Development: Community Development Block Grant (CDBG), Emergency Solutions Grants (ESG), HOME Investment Partnerships Program (HOME), Neighborhood Stabilization Programs (NSP), and Lead Hazard Control & Healthy Homes Grant.

The Draft CAPER will be available for review beginning **Wednesday, August 27, 2025**, on the website of the following entities:

Department of Housing and Community Development
One Government Center, 18th Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/departments/housing-community-development>

Lucas Metropolitan Housing
424 Jackson Street
Toledo, Ohio 43604
website: www.lucasmha.org

Office of the Mayor
One Government Center, 22nd Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/government/mayor>

Toledo Lucas County Homelessness Board
1220 Madison Avenue
Toledo, Ohio 43604
website: www.endinghomelessness Toledo.org

Clerk of Council
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The Fair Housing Center
326 N. Erie Street
Toledo, Ohio 43604
website: www.toledofhc.org

Lucas Co. Board of Developmental Disabilities
1154 Larc Lane
Toledo, Ohio 43614
website: www.lucasdd.info

A Public Hearing on the Draft CAPER is scheduled as follows:

**Thursday, September 4, 2025, 5:30 p.m.
City Council Chambers, 1st Floor
One Government Center, Toledo, OH 43604**

The City of Toledo will also receive comments from the public in writing beginning **Wednesday, August 27, 2025**, through **Wednesday, September 10, 2025**, at the following address:

CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2024-2025 CAPER
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

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Department of Housing and Community Development to Report Accomplishments; Encourages Public Comments

 Friday, August 15, 2025

The city of Toledo's (COT) Department of Housing and Community Development is seeking comments on its DRAFT Consolidated Annual Performance and Evaluation Report (CAPER). Citizens are invited to participate in a virtual Public Hearing and learn more about how the City utilized federal dollars for the benefit of low- and moderate-income residents during the Program Year 2024 (ending on June 30, 2025).

The 2024 DRAFT CAPER will be presented at the following public hearing:

Thursday, September 4, 2025, 5:30 p.m.

City Council Chambers, 1st Floor

One Government Center, Toledo, OH 43604

Comments on the 2024 DRAFT CAPER are welcome at the Public Hearing. The city of Toledo will accept written comments from the public beginning Wednesday, August 27, 2025 through Wednesday, September 10, 2025 by submittal to: City of Toledo, Department of Housing and Community Development, 2024-2025 CAPER, One Government Center, Suite 1800, Toledo, Ohio 43604 or by email to: monica.brown@toledo.oh.gov

The DRAFT CAPER will be available for review beginning Wednesday, August 27, 2025, on the website of the following entities:

Department of Housing and Community Development
One Government Center, 18th Floor
Downtown Toledo, Jackson & Erie Streets
Toledo, Ohio 43604
website: <https://toledo.oh.gov/departments/housing-community-development>

Lucas Metropolitan Housing
424 Jackson Street Toledo, Ohio 43604
website: <https://link.edgepilot.com/s/1623e3d4/4sp4JJu4QUaXngG-1MaZkw?u=http://www.lucasmha.org/>

Office of the Mayor
One Government Center, 22nd Floor
Downtown Toledo, Jackson & Erie Streets Toledo, Ohio 43604
website: <https://toledo.oh.gov/government/mayor>

Toledo Lucas County Homelessness Board
1220 Madison Avenue
Toledo, Ohio 43604
website: <https://link.edgepilot.com/s/8d33db20/mYCGFe0L0EaA7Wfbc9EqjA?u=http://www.endinghomelessness Toledo.org/>

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website: <https://link.edgepilot.com/s/ebf0ff5c/g-WNr6fVuEK3-ECSTke1Q?u=http://www.toledolibrary.org/>

The Fair Housing Center

326 N. Erie St.

Toledo, Ohio 43604

website:

<https://link.edgepilot.com/s/2fd29b0d/0PV0SaU3xkmUF3y7w4NqKg?u=http://www.toledofhc.org/>

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website: <https://link.edgepilot.com/s/5e313e9b/4xdJo1-G0kKLgRFp1jDO0g?u=http://www.lucasdd.info/>

The 2024 DRAFT CAPER presentation will provide an assessment of the federally funded programs monitored by the COT's Department of Housing and Community Development:

Community Development Block Grant (CDBG) for community, economic and housing development;

HOME Investment Partnerships Program (HOME) for housing development:

- **Emergency Solutions Grant (ESG) for the elimination of homelessness;**
- **Lead Hazard Control and Healthy Homes Grant; and**
- **Other HUD Grants & Grants from the U. S. Treasury.**

The Department of Housing and Community Development continues to work closely with the Toledo Lucas County Homelessness Board to assist in the goal of eliminating and reducing homelessness and with The Fair Housing Center to affirmatively further fair housing in Toledo. At the Public Hearing, more information will be provided related to the progress achieved in these areas.

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ADA coordinator at (419) 245-1198 or submit a request online at <https://toledo.oh.gov/accessibility/ada-accommodation>.

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News Release

Media Contact

Amy Voigt: 419-389-2260

August 15, 2025

TOLEDO, OH - The city of Toledo's (COT) Department of Housing and Community Development is seeking comments on its **DRAFT** Consolidated Annual Performance and Evaluation Report (CAPER). Citizens are invited to participate in a virtual Public Hearing and learn more about how the City utilized federal dollars for the benefit of low- and moderate-income residents during the Program Year 2024 (ending on June 30, 2025).

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City Council Chambers, 1st Floor

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website: www.endinghomelessnessstoleado.org

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The 2024 **DRAFT** CAPER presentation will provide an assessment of the federally funded programs monitored by the COT's Department of Housing and Community Development:

- **Community Development Block Grant (CDBG) for community, economic and housing development;**
- **HOME Investment Partnerships Program (HOME) for housing development;**
- **Emergency Solutions Grant (ESG) for the elimination of homelessness;**
- **Lead Hazard Control and Healthy Homes Grant; and**
- **Other HUD Grants & Grants from the U. S. Treasury.**

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Brown, Monica

From: Thorpe, Susan
Sent: Thursday, August 14, 2025 10:35 AM
To: 'aebbert@cherrystreetmission.org'; 'afitzgerald@ablelaw.org'; 'annebauman@compassionhealthtoledo.org'; 'anneruch@gmail.com'; 'antduran8213@gmail.com'; 'ArringtL@co.lucas.oh.us'; Believe Ctr. Believe Ctr.; 'dhawkins@toledofhc.org'; 'dseeger@nhainc.org'; 'dsteele@pathwaytoledo.org'; 'emcpartland@mvhabitat.org'; 'eod.sqacc@gmail.com'; 'es_maverick@hotmail.com'; 'frankt@co.lucas.oh.us'; 'gcommu8708@bex.net'; 'gthomas@toledofhc.org'; 'jacksonv@co.lucas.oh.us'; 'janellematson@compassionhealthtoledo.org'; Janet Carter; 'jb_sqacc@yahoo.com'; 'jjarrett@theartscommission.org'; 'jmueller@pathwaytoledo.org'; 'kachinger@mvhabitat.org'; 'kbaroudi@co.lucas.oh.us'; 'kclark@pathwaytoledo.org'; LEGAL AID OF WESTERN OHIO, INC.; 'lsmigielski@theartscommission.org'; 'mfolk@theartscommission.org'; MLK KITCHEN FOR THE POOR, INC; 'mlk.kitchen@att.net'; Doni Miller; 'pageelaine1@aol.com'; 'rjordan@pathwaytoledo.org'; 'rshields@nhainc.org'; 'rstone@ablelaw.org'; 'scrabtree@ablelaw.org'; s douglas; 'stokest@co.lucas.oh.us'; 'tbouyack@nhainc.org'; t pence; 'vmartinez@lawolaw.org'; vinny Riccardi; 'wbarrow@pathwaytoledo.org'; David; Wendi Huntley; Yvonne Dubielak; 'abdul.hamadeh@unitedwaytoledo.org'; 'associatedirector@familyhousetoledo.org'; 'executivedirector@familyhousetoledo.org'; 'grantwriter@spcc-toledo.org'; Julie Embree; 'jhabib@spcc-toledo.org'; John Irwin; 'jjacobs@lfhtoledo.org'; 'jseibel@lfhtoledo.org'; Lisa Pengov; 'lwatson@cherrystreetmission.org'; 'matt.morris@unitedwaytoledo.org'; 'mburda@lfhtoledo.org'; 'rpetroff@lfhtoledo.org'; 'jcordella@historicsouth.org'; 'wendy.pesttrue@unitedwaytoledo.org'; 'jmontague@cherrystreetmission.org'; 'cathy@believecenterinc.com'; Morgan Thomas; 'johnnyhorn1974@gmail.com'; Alison Kuntz; 'Claudia Witkowski'; 'rgagnon@cherrystreetmission.org'; 'sarah.ryley@toledogrows.org'; 'csavage@pathwaytoledo.org'; 'cwagner@historicsouth.org'; DeSteno, Sandra; Johnathan Nichols; 'gardens.sqacc@gmail.com'; 'erin.tupper@unitedwaytoledo.org'; 'Mueller, Mikayla'; 'ckurtz@historicsouth.org'; Mike Anderson; 'shellyb@thatneighborhoodchurch.com'; Terri Rodriguez; Traci Jaksetic; Jeanette Hrovatic; Corder, Nina; Annora Harbick; NEIGHBORWORKS TOLEDO REGION; Brian Green; Jaime Johnson; 'smanns@lucasmha.org'; 'Ischoen@lucasmha.org'; Sam Melendez; 'cshackelford@lucasmha.org'
Cc: Brown, Monica; Knighten, Drenda
Subject: 2024-2025 CAPER Public Hearing
Attachments: 2024-2025 CAPER Public Notice.doc
Importance: High

Good morning,

The City of Toledo, Department of Housing and Community Development (DHCD) has scheduled a public hearing on the Draft 2024-2025 Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER includes the undertakings, activities, and accomplishments completed during the 2024-2025 Program Year and provides an assessment of the federally funded programs administered by the DHCD.

You are invited to attend the public hearing on the Draft 2024-2025 CAPER.

The Public Hearing is scheduled as follows:

Thursday, September 4, 2025
5:30 p.m.
City Council Chambers, 1st Floor
One Government Center
Toledo, OH 43604

Please see the attached public notice for further details.

Susan Thorpe
Clerk Specialist II
City of Toledo
Department of Housing and Community Development
One Government Center, Suite 1800
Toledo, OH 43604
(419) 245-1441 (office)
(419) 245-1192 (fax)
susan.thorpe@toledo.oh.gov

Visit us at: www.toledo.oh.gov

**PUBLIC NOTICE
CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
for
2024 Program Year – July 1, 2024 to June 30, 2025**

The City of Toledo (COT) is directed by the U.S. Department of Housing and Urban Development (HUD) to notify the general public of the undertakings, activities, and accomplishments completed in and at the close of each Program Year through a Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER provides an assessment of the federally funded programs administered by the COT's Department of Housing and Community Development: Community Development Block Grant (CDBG), Emergency Solutions Grants (ESG), HOME Investment Partnerships Program (HOME), Neighborhood Stabilization Programs (NSP), and Lead Hazard Control & Healthy Homes Grant.

The Draft CAPER will be available for review beginning **Wednesday, August 27, 2025**, on the website of the following entities:

Department of Housing and Community Development
One Government Center, 18th Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/departments/housing-community-development>

Lucas Metropolitan Housing
424 Jackson Street
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website: www.lucasmha.org

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CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2024-2025 CAPER
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

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Fair Housing Report

Fair Housing Action Plan: July 2024 through June 2025 Update

According to HUD's guidance, the plan to address the impediments should:

- List fair housing action(s) to be completed for each objective.
- Determine the time period for completion.
- Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or otherwise support fair housing actions.
- Identify individuals, groups, and organizations to be involved in each action and define their responsibilities. Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated. HUD recommends that jurisdictions specify these commitments in the appropriate contracts that may arise in connection with the fair housing actions.
- Set priorities. Schedule actions for a time period which is consistent with the Consolidated Plan cycle.¹

Consistent with HUD's guidelines, the action plan provided here will help guide the City of Toledo to address the identified local impediments to fair housing.

Action Plan Format and Explanation

The action plan provided on the following pages is organized into charts covering each of the identified goals to address Fair Housing Impediments. Each chart provides objectives as required by HUD's guidelines, City departments with appropriate responsibilities, information about the potential involvement of other partner institutions including The Fair Housing Center, and suggested deadlines for completion. Under chart, space is provided for discussion. As the City moves forward, this "discussion" space will provide notes on progress made or potential changes, or suggestions for changes, to the action plan.

¹ *Id.*

Fair Housing Issue: Criminal History Screening

Goal: Ban the box policy

Measurable Objectives	City Department Responsible	Other Institutions	TFHC's role	Deadline
Complete initial meeting	City staff should consult with City Council and then schedule an initial meeting to evaluate	RCNO	TFHC will attend initial meeting	First half of FY 2020
Develop schedule for next steps in evaluation	Leadership, meeting space, encouragement	RCNO, other groups as determined	TFHC will provide technical assistance and support	Second half of FY 2020
Draft legislation	City's law department will assist		TFHC may provide review and technical assistance	Second half of FY 2020
Introduce legislation to City Council	City Council and Mayor's office seeks introduction			First quarter of 2021
Complete hearings and final council vote on the issue	City Council	RCNO and other groups to provide public support	TFHC may provide support and technical assistance	First quarter of 2022

Discussion:

Reporting period: July – September 2020 & October – December 2020

No updates this reporting period.

Reporting period: January – March 2021 & April – June 2021

- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. Discussion has included consideration of an ordinance that would limit the criteria housing providers use to screen tenants, including restrictions on use of

criminal history. The group advocates for legislation that would ensure housing providers' tenant selection policies comply with 2016 HUD guidelines regarding criminal history screening, including evaluation of the nature of offenses to determine whether they demonstrate a risk to the safety of the property or residents. These types of policies help to prevent unfair denial of housing to applicants who would otherwise qualify and increase the availability of housing for individuals returning from incarceration.

- In June 2021, HUD released a memo outlining plans to improve access to stable housing for reentry by increasing the availability of housing vouchers, providing tools and guidance to housing providers to ensure tenant selection plans are consistent with 2016 HUD guidelines regarding criminal history screening, evaluating HUD's policies to identify barriers for reentry, and making information about best practices more widely available.

Reporting period: July - September 2021 & October - December 2021

No updates this reporting period.

Reporting period: December 2021 through January 2023

- So far, a local ban the box proposal has not been formally presented to City Council or other decision-makers. While the potential for it has been discussed, tangible movement on a local ban the box law has not occurred.
- The City and other stakeholders may wish to consider convening focus group discussions with advocates to review how such a local policy could be crafted and how it could be enforced. It is important to note that other policies that the City has adopted, such as source of income discrimination laws need to be enforced as well.

Reporting period: January 2023 through June 2023

No further updates at this time.

Reporting period: July 2023 through June 2024

The Fair Housing Center filed a case in federal court on behalf of Mr. Henry Reed alleging discrimination on the basis of race after a housing provider refused to renew his lease due to criminal history. TFHC took this opportunity to educate the public on the importance of criminal history screening as a fair housing issue.

There are no further updates at this time related to the potential development or passage of a local ban the box law.

Final report

There are no further updates on this project. Given the lack of progress on this issue. The Center has redirected efforts in this area in the new 2025-2030 AI and Action Plan to focus on taking advantage of a new state law that allows ex-offenders to seek a certification for qualification for housing, while also enforcing fair housing rights for ex-offenders.

Fair Housing Issue: Criminal History Screening

Goal: Set aside affordable housing opportunities

Measurable objectives	City Department Responsible	Other Institutions	TFHC's role	Deadline
Complete initial meeting	City staff to schedule meeting and review potential for unit set asides with LMH	LMH	TFHC will attend initial meeting	First half of FY 2020
Develop schedule for next steps in evaluation	City staff to provide assistance and follow through to ensure progress	LMH	TFHC may provide assistance in determining next steps	Second half of FY 2020
Determine number of hard units and vouchers to be set aside	In consultation with LMH, determine a projection for potential set aside of units and vouchers	LMH		Second half of FY 2020
Set target time for roll out of set aside	City staff to track	LMH	TFHC may also monitor	First quarter of 2021

Discussion:

Reporting period: July – September 2020 & October – December 2020

Update from LMH: The Ridge Project is designed to provide vouchers to the re-entry population. This program in initial phase.

Reporting period: January – March 2021 & April – June 2021

Update from LMH:

- For the Emergency Voucher Program, HUD allowed PHAs, like LMH, to waive certain requirements in the Admin. Plan related to prior criminal activity. LMH has accepted those waivers.
- LMH is also in process of a review of the Admin. Plan in its entirety. That process will include a review, and likely revision to the look back period, so that it matches the standard set in the ACOP. That is likely to be done within next year as LMH has had a large turn over in leadership within the HCV program.

Reporting period: July - September 2021 & October - December 2021

Update from LMH: Emergency Voucher Program is still moving forward, more updates expected next quarter.

Reporting period: December 2021 through January 2023

- The Fair Housing Center has not yet received updated on the status of LMH's Emergency Voucher program. The Fair Housing Center is currently reviewing LMH's local policies on criminal history screening as they relate specifically to the housing choice voucher program and may soon discuss the potential for improving these policies with LMH. The City may also wish to review these policies from its perspective considering the goal of eliminating barriers to fair housing choice.

Reporting period: January 2023 through June 2023

- No further updates at this time.

Reporting period: July 2023 through June 2024

LMH has begun setting aside housing choice voucher opportunities for the reentry population. In addition, in December 2023, LMH updated its criminal history screening policies related to the voucher program to improve compliance with fair housing and HUD's guidelines.

TFHC met with the Ridge Project which is coordinating the receipt and implementation of HCV opportunities with LMH for the reentry population. The Ridge Project is grateful for the HCV opportunities but its clients are still experiencing significant barriers as they attempt to use the vouchers in the community.

Final Report

The Center is glad to see that this project which we had advocated for over the years come to fruition with the Ridge Project.

Fair Housing Issue: Criminal History Screening**Goal: Private housing provider compliance**

Measurable objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Develop and review plans for outreach	Provide support to TFHC	LMH	With available resources, will perform outreach	Second half of FY 2020

Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020
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Discussion:

Reporting period: July – September 2020 & October – December 2020

TFHC drafted a model criminal history screening policy for housing providers that complies with HUD's 2016 guidelines. This document can serve as a template that housing providers can adopt or use as a guide to develop their own criminal history screening policy that aligns with fair housing recommendations. TFHC plans to share this policy more widely with contacts in the reentry community as well as with housing providers during its regular fair housing training sessions.

Reporting period: January – March 2021 & April – June 2021

- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. Discussion has included consideration of an ordinance that would limit the criteria housing providers use to screen tenants, including restrictions on use of criminal history. The group advocates for legislation that would ensure housing providers' tenant selection policies comply with 2016 HUD guidelines regarding criminal history screening, including evaluation of the nature of offenses to determine whether they demonstrate a risk to the safety of the property or residents. These types of policies help to prevent unfair denial of housing to applicants who would otherwise qualify and increase the availability of housing for individuals returning from incarceration.
- TFHC conducted a virtual training focused on fair housing rights for reentry via Zoom and Facebook Live in April 2021, helping reentry advocates and service providers better understand how fair housing laws apply to individuals returning from incarceration.

Reporting period: July - September 2021 & October - December 2021

- The Building Bridges of Opportunity Community Experience virtual conference took place in October 2021, engaging statewide reentry advocates to learn about effective practices for successful reentry, connect to reentry resources, and collaborate with other reentry coalitions. TFHC participated in the conference by conducting a training session on how fair housing rights are applicable to reentry populations, including guidance on use of criminal history screening criteria by housing providers.

-
- TFHC regularly investigates allegations of housing discrimination based on criminal history.
 - TFHC regularly conducts fair housing trainings for housing professionals, and these sessions include guidance for housing providers on how to conduct criminal history screenings in compliance with fair housing and HUD regulations.

Reporting period: December 2021 through January 2023

- TFHC continues to regularly conduct fair housing trainings for housing professionals, and these sessions include guidance for housing providers on how to conduct criminal history screenings in compliance with fair housing and HUD regulations.
- TFHC has been successful in multiple cases filed before the Ohio Civil Rights Commission regarding criminal history screening.

Reporting period: January 2023 through June 2023

- TFHC continues to regularly conduct fair housing trainings for housing professionals, and these sessions include guidance for housing providers on how to conduct criminal history screenings in compliance with fair housing and HUD regulations.
- TFHC has been successful in multiple cases filed before the Ohio Civil Rights Commission regarding criminal history screening.

Reporting period: July 2023 through December 2023

- TFHC continues to regularly conduct fair housing trainings for housing professionals, and these sessions include guidance for housing providers on how to conduct criminal history screenings in compliance with fair housing and HUD regulations.
- TFHC has been successful in multiple cases filed before the Ohio Civil Rights Commission regarding criminal history screening.
- TFHC has been increasing its litigation in federal court as well. TFHC filed several cases in federal court during this reporting period.

Reporting period: January 2024 through June 2024

- No additional updates at this time. See immediately proceeding points.

Final Report

This project with LMHA continues to represent an important milestone success story in addressing criminal history screening.

Fair Housing Issue: Homeownership: Lending and Insurance

Goal: Encourage private lenders to provide credit opportunities in minority and low-income neighborhoods

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Develop and review plans for outreach	Provide support to TFHC		With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Discussion:

Reporting period: July – September 2020 & October – December 2020

TFHC continues to work with KeyBank and Premier Bank (formerly First Federal Bank) to make lending accessible in underserved communities. TFHC met with KeyBank on 9/23/2020 and 2/1/2021. TFHC met with Premier Bank on 10/30/2020.

Reporting period: January – March 2021 & April – June 2021

TFHC met with Key Bank regarding the EQ2 investment on 3/2/2021, 3/10/2021 and 3/26/2021. TFHC held a quarterly meeting with Premier Bank on 3/26/2021.

Reporting period: July - September 2021 & October - December 2021

- TFHC met with KeyBank on 11/4/21.
- KeyBank, NeighborWorks Toledo Region, and The Fair Housing Center announced a partnership to make financing single-family homes easier and more affordable for low- to moderate-income individuals and families throughout the City of Toledo. The program, funded by a \$3 million investment from KeyBank and administered by NeighborWorks, will provide an estimated 60 first mortgage and refinance loans at below market rates to borrowers in primarily LMI neighborhoods with an annual income not exceeding 80 percent of the area median income. Designed to remove many of the obstacles people face when applying for a traditional loan, this new effort will help to improve access to homeownership by supporting first-time homebuyers in historically underserved neighborhoods.

Reporting period: December 2021 through January 2023

- TFHC continues regular meetings and review of KeyBank's loan program. As of January, 2023, KeyBank has implemented about \$1.5 million in loans in LMI neighborhoods as a result of the settlement agreement with TFHC.
- Starting in 2023, TFHC will be meeting with all the largest local banks in Toledo to discuss their CRA commitments.
- At the end of 2022, Fifth Third notified its members and the Office of the Comptroller of the Currency that it would be closing an important branch location in Toledo. The Fair Housing Center and others in the community are reviewing this issue and the impact it will have on Toledo.

Reporting period: January 2023 through June 2023

- Fifth Third recently indicates that it would be selling the branch that it chose to close to a local credit union at below the market rate for the property.
- The OCC has committed to providing a listening session for the Toledo area.
- The Fair Housing Center plans to work with local groups to prepare for the listening session and also educate more community groups on the CRA and CRA advocacy.

Reporting period: July 2023 through December 2023

- Fifth Third recently indicates that it would be selling the branch that it chose to close to a local credit union at below the market rate for the property.
- The OCC has committed to providing a listening session for the Toledo area.
- TFHC has scheduled with OCC the first training session on Jan. 18, 2024. It is inviting many local institutions to attend the training.
- A listening session will be held in February as well.
- This training and listening session is a significant development for the Toledo area in terms of building work around CRA advocacy.

Reporting period: January 2024 through June 2024

- The Fair Housing Center conducted the CRA training and listening sessions as explained above. Approximately 100 persons attended and the sessions were very well received.
- In addition, the Center has continued to meet with local banks, including KeyBank and others to encourage investments in the Toledo area for low-income and minority residents and census tracts.

Final report

The need for an increase in homeownership opportunities for Toledoans continues to be a critical issue. TFHC continues to recommend action on this in a continuation of the efforts listed above. There are no further updates.

Fair Housing Issue: Homeownership: Lending and Insurance

Goal: Address insurance discrimination issues

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Develop and review plans for outreach	Provide support to TFHC		With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Discussion:

Reporting period: July – September 2020 & October – December 2020

- TFHC filed a case against the Ohio FAIR Plan demanding access to the Ohio Fair Plan's public records. The Ohio FAIR Plan's position is that it is not subject to public records requests. TFHC filed a mandamus action which is still pending in the Court of Appeals for the 10th Dist. of Ohio.
- TFHC also has at least one insurance discrimination case currently pending before the Ohio Civil Rights Commission.

Reporting period: January – March 2021 & April – June 2021

TFHC met with Key Bank regarding the EQ2 investment on 3/2/2021, 3/10/2021 and 3/26/2021. TFHC held a quarterly meeting with Premier Bank on 3/26/2021.

Reporting period: July - September 2021 & October - December 2021

- TFHC was recently successful in assisting a complainant in asserting a redlining claim against Allstate Insurance. The Ohio Civil Rights Commission found probable cause and the matter is now before an administrative law judge.
- TFHC was successful in a mandamus action filed against Ohio Fair Plan to force it to provide public records regarding access to insurance in Ohio. TFHC was successful before the magistrate in the 10th Dist. Court of Appeals. The case is currently pending with objections to the magistrate's decision filed by Ohio Fair Plan.

Reporting period: December 2021 through January 2023

- TFHC's lawsuit against the Ohio Fair Plan, discussed above, was successful before the 10th Dist. Court of Appeals. The Ohio Plan appealed to the Ohio Supreme Court. Oral arguments in the case are scheduled for March 22, 2023.

Reporting period: January 2023 through June 2023

- Oral arguments in the case described above took place in March. We are presently waiting for the Court to issue a decision.

Reporting period: July 2023 through December 2023

- The Fair Housing Center was successful in the case described above after oral argument. This is a significant victory before the Ohio Supreme Court.
- After this success, Ohi Fair Plan provided the insurance data that TFHC requested. The University of Toledo's Urban Affairs Center is currently working with the data to analyze trends and map the addresses of insurance applications denied and approved.

Reporting period: January 2024 through June 2024

- After The Fair Housing Center's success in suing the Ohio Fair Plan to uncover its records, the Center worked with UT's Urban Affairs Center to analyze the data. The data show that there are "cold spots" in the implementation of the insurance program. This means that there are areas that receive a relatively lower number of insurance policies. Some of these areas are ones that should qualify for the insurance product. This initial analysis merits further investigation.

Final Report

The Center continues to identify insurance access as an important, though difficult to track, barrier to fair housing choice. There are no further updates at this time as The Center continues to hope to do more with the Ohio Fair Plan data mentioned above.

Goal: Coordinate with local banks to create a loan product to address credit needs in minority neighborhoods

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Complete initial meeting	City staff should consult with TFHC to identify appropriate next steps for outreach and models from other cities		TFHC will attend meeting	Second half of FY 2020
Develop schedule for next steps in evaluation	Research models from other cities for coordination to encourage improved loan products		TFHC may assist with technical support as needed	Second half of FY 2020
Convene meetings with banks as appropriate	Discuss potential product collaborations with banks		TFHC can be available if needed	First half of 2021
Set time frame for roll out of new loan products	Consults with banks to determine this		TFHC reviews, discusses with city	First half of 2021

Discussion:

Reporting period: July – September 2020 & October – December 2020

- TFHC continues to work with KeyBank to create a much-needed community loan product.
- While TFHC continues its work as listed above, TFHC suggests that the City should convene a meeting of local banks to discuss improving the products that they make available to Toledoans, especially in majority-minority neighborhoods.
- At the same time, TFHC plans to analyze more closely local HMDA data that will become available later in 2021. TFHC is in discussions with other researchers to

help with analysis of this data. This information may be helpful to report publicly in order to encourage banks to improve lending services.

Reporting period: January – March 2021 & April – June 2021

TFHC met with Key Bank regarding the EQ2 investment on 3/2/2021, 3/10/2021 and 3/26/2021. TFHC held a quarterly meeting with Premier Bank on 3/26/2021.

Reporting period: July - September 2021 & October - December 2021

- TFHC met with KeyBank on 11/4/21.
- KeyBank, NeighborWorks Toledo Region, and The Fair Housing Center announced a partnership to make financing single-family homes easier and more affordable for low- to moderate-income individuals and families throughout the City of Toledo. The program, funded by a \$3 million investment from KeyBank and administered by NeighborWorks, will provide an estimated 60 first mortgage and refinance loans at below market rates to borrowers in primarily LMI neighborhoods with an annual income not exceeding 80 percent of the area median income. Designed to remove many of the obstacles people face when applying for a traditional loan, this new effort will help to improve access to homeownership by supporting first-time homebuyers in historically underserved neighborhoods.

Reporting period: December 2021 through January 2023

- As explained above, about \$1.5 million of the loan product provided through Neighborworks by KeyBank has been implemented.
- As mentioned above, TFHC will be meeting with all the largest banks in the area to review their CRA commitments.

Reporting period: January 2023 through June 2023

- No additional updates in this reporting period. The work described above is ongoing.

Reporting period: July 2023 through December 2023

- KeyBank continues to implement its product as described above.

Reporting period: January 2024 through June 2024

- KeyBank continues to implement its product as described. In the most recent meeting with KeyBank, it communicated that it had nearly expended all of the funds. Less than \$100,000 remain. The Fair Housing Center has advocated that Key continue the product with additional funding. Key is evaluating the potential for this.

Final report

The Center successfully advocated for actions by Fifth Third bank to reduce the harm of a branch closure in a majority-minority neighborhood.

Fair Housing Issue: Accessibility for persons with disabilities

Goal: Enforce current visitability and accessibility rules

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Collect information on current enforcement efforts	City staff may help provide information on current enforcement of accessibility rules		TFHC will help collect information	Second half of FY 2020
Develop and review plans for outreach	Provide support to TFHC		With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Discussion:

Reporting period: July – September 2020 & October – December 2020

Update from TFHC:

- TFHC has a representative that serves on the Toledo Lucas County Commission on Disabilities and Community Advocates for Transportation Rights (CATR).

Update from The Ability Center:

- The Ability Center participated in the City of Toledo Consolidated Planning process and gave input on the basis of the needs of people with disabilities.
- The Ability Center monitored monthly reports regarding new housing developments.
- The Ability Center held regular meetings with the Department of Neighborhoods and Area Office on Aging to discuss housing issues.
- 8/25/2020: Housing Equity Roundtable
- 9/2/2020: Ohio Housing Policy Panel
- 9/29/2020: Housing Equity Policy Group

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- 10/15/2020: COT 10-year Housing Action Plan
 - 12/16/2020: DD Council Housing Policy Panel

Reporting period: January – March 2021 & April – June 2021

- A settlement was reached in a lawsuit filed by TFHC, The Ability Center, and resident Jenny Tillman against the builders and developers of Brooklynn Park senior housing community, alleging discrimination against persons with disabilities for failing to comply with federal regulations for housing accessibility. The agreement requires defendants to pay \$400,000 in damages and provide remediations to properties at no cost to residents. The case was covered by the local media and helped to raise awareness of the fair housing accessibility requirements that apply to design and construction.

Update from The Ability Center:

- 3/10/2021 Ohio Housing Policy Panel
- Tenant Protection Initiatives
- 4/7/2021: housing review for accessibility
- 4/2021: meeting with DON to discuss housing accessibility
- 4/2021: COT 10-year housing plan
- 5/2021: OSILC Housing Workgroup meeting
- 5/2021: housing accessibility review

Reporting period: July - September 2021 & October - December 2021

Update from TFHC:

- TFHC has a representative that serves on the Toledo Lucas County Commission on Disabilities and Community Advocates for Transportation Rights (CATR).

Reporting period: January 2023 through June 2023

- No further updates at this time. The work described above is ongoing.

Reporting period: July 2023 through December 2023

- No further updates at this time. The work described above is ongoing.

Reporting period: January 2024 through June 2024

- No further updates at this time. The work described above is ongoing.

Final Report

No further updates.

Fair Housing Issue: Accessibility for persons with disabilities

Goal: Encourage developers to increase accessibility

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review current advocacy efforts	Consult with Ability Center	Ability Center	TFHC may engage in discussion as well	First half of FY 2020
Develop schedule for next steps in evaluation	Consult with Ability Center in this schedule	Ability Center		Second half of FY 2020
Draft legislation or other policy	Completed in consultation with Ability Center	Ability Center		Second half of FY 2020
Set timeframe for implementation of legislation or policy	Completed in consultation with Ability Center	Ability Center		First quarter of 2021

Discussion:

Reporting period: July – September 2020 & October – December 2020

Update from TFHC:

- TFHC has a representative that serves on the Toledo Lucas County Commission on Disabilities and Community Advocates for Transportation Rights (CATR).
- TFHC recently achieved a victory in the Federal Court for the Northern District of Ohio. On Summary Judgment, the Court found that the front entrances of a certain housing development must be made accessible even where the defendant alleged that another entrance, such as a garage, may be accessible. The authority extending from this case may be helpful for future enforcement efforts to assist persons with disabilities.

Update from The Ability Center:

- Ability Center convened the Universal Design Coalition, which put together a list of desired single-family housing accessibility features.
- The Universal Design Coalition made contact with an architect who will give a free consultation to single-family developers on how to adapt their plans in order

to offer an accessible/ visitable plan to potential customers.

- The Ability Center monitored reports from the City of Toledo and gave input into the plans of four different multi-family housing developments.
- 8/25/2020: Housing Equity Roundtable
- 9/2/2020: Ohio Housing Policy Panel
- 9/29/2020: Housing Equity Policy Group
- 10/15/2020: COT 10-year Housing Action Plan
- 12/16/2020: DD Council Housing Policy Panel

Reporting period: January – March 2021 & April – June 2021

- A settlement was reached in a lawsuit filed by TFHC, The Ability Center, and resident Jenny Tillman against the builders and developers of Brooklynn Park senior housing community, alleging discrimination against persons with disabilities for failing to comply with federal regulations for housing accessibility. The agreement requires defendants to pay \$400,000 in damages and provide remediations to properties at no cost to residents. The case was covered by the local media and helped to raise awareness of the fair housing accessibility requirements that apply to design and construction.
- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. Discussion has included consideration of an ordinance that would increase the required number of accessible units for any newly constructed federally subsidized housing developments.
- TFHC participates on The Ability Center's Universal Design Coalition.

Update from The Ability Center:

- 3/10/2021 Ohio Housing Policy Panel
- Tenant Protection Initiatives
- 4/7/2021: housing review for accessibility
- 4/2021: meeting with DON to discuss housing accessibility

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- 4/2021: COT 10-year housing plan
 - 5/2021: OSILC Housing Workgroup meeting
 - 5/2021: housing accessibility review

Reporting period: July – September 2021 & October – December 2021

Update from TFHC:

- TFHC has a representative that serves on the Toledo Lucas County Commission on Disabilities and Community Advocates for Transportation Rights (CATR).
- TFHC participates on The Ability Center's Universal Design Coalition.

Reporting period: December 2021 through January 2023

- TFHC reached a settlement agreement in a case filed against an entity called Clover Group that owns and manages properties across the county including Northwest Ohio. The lawsuit was based on a failure to comply with accessibility requirements. The lawsuit requires the defendant to implement changes to improve accessibility at the housing projects.
- TFHC continues to support the Ability Center's work as described above.

Reporting period: January 2023 through June 2023

- The Fair Housing Center and the Ability Center continue to partner in the work described above.

Reporting period: July 2023 through December 2023

- The Fair Housing Center and the Ability Center continue to partner in the work described above. The Fair Housing Center is assisting with the Ability Center's Universal Design Coalition, attending meetings, etc.
- The Fair Housing Center also recently filed an important fair housing design and construction case with the Ohio Civil Right Commission against a development completed in 2022.

Reporting period: January 2024 through June 2024

- No further updates at this time. The work described above is ongoing.

Final report

The Ability Center has not proceeded with its prior plan to encourage developers with a "Universal Design Coalition" and are focusing on other priorities. Without this key partner, it is unlikely that this goal will progress as previously expected. The new 2025-2030 AI aims to address these issues in different ways.

Fair Housing Issue: Source of income discrimination and voucher mobility

Goal: Enact local source of income discrimination protections

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review status of local ordinance with Council	City to conduct this review		TFHC will attend initial meetings as needed	First half of FY 2020
Determine barriers to implementation of legislation	City to complete this review with Council	Possibly LMHA	TFHC can assist in discussions	Second half of FY 2020
Develop plan to address barriers if needed with clear timeframe for progress	City in consultation with others	LMHA	TFHC to assist	Second half of FY 2020
Complete vote to approve legislation	City Council			First quarter of 2021
Complete hearings and final council vote on the issue	City Council		TFHC to provide support	First quarter of 2022

Discussion:

Reporting period: July – September 2020 & October – December 2020

An ordinance prohibiting discrimination based on source of income—initially introduced to Toledo City Council in 2018 but not acted upon—was reintroduced in the fall of 2020. The legislation updates the City of Toledo's already existing anti-discrimination ordinance to include source of income as an additional protected class, effectively requiring housing providers to accept all legal, reliable sources of income including disability and military benefits, Social Security, and Housing Choice Vouchers (HCV). Public hearings were held by City Council, including a Neighborhoods Committee meeting and a Committee of the Whole meeting, which featured presentations from several community partners and allowed for public input. The legislation received support from organizations including TFHC, LMH, The Ability Center, ABLE, TLCHB, MHR SB, UPSE, and United Way of Greater Toledo. Many landlords and property owners expressed opposition to the ordinance, citing a reluctance to accept vouchers and participate in the HCV program. Legislation passed in December 2020 and goes into effect 120 days after passage. Partners including TFHC and LMH are developing an educational campaign to inform housing providers about the ordinance, in an effort to address FAQs, help housing providers become more familiar with the HCV program, and encourage compliance. Plans include distributing informational documents and hosting an online training session.

Reporting period: January – March 2021 & April – June 2021

- TFHC and LMH collaborated to conduct a virtual informational session in March 2021 via Zoom and Facebook Live. Geared towards housing providers, the session provided an overview of the requirements of the SOI anti-discrimination ordinance and the housing choice voucher program, addressed common concerns, and answered questions from attendees. TFHC and LMH also developed educational materials for distribution to the community. In addition, TFHC incorporated information about SOI into its training curriculum that is utilized on an ongoing basis to educate housing providers and community members about fair housing rights and responsibilities.
- TFHC is accepting complaints and compiling relevant data related to instances of SOI discrimination.
- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement of SOI and other local civil rights protections. To assist in this effort, TFHC is conducting research to determine what methods other cities are employing to enforce local anti-discrimination ordinances.

Reporting period: July - September 2021 & October - December 2021

- TFHC regularly investigates allegations of discrimination based on source of income.
- TFHC assists housing providers in complying with SOI protections by conducting trainings, distributing educational materials, and providing guidance on policies and practices.

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- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement of SOI and other local civil rights protections.

Reporting period: December 2021 through January 2023

- The overall status of local SOI protections has not changed. However, the City of Toledo has created a new position, Landlord-Tenant Services Coordinator. One of the purposes of this position is to ensure enforcement of the local SOI discrimination law. The Fair Housing Center has been coordinating with the City and provide information and support as needed.

Reporting period: January 2023 through June 2023

- The City of Toledo has recently discussed with TFHC plans to implement enforcement of the local SOI discrimination law. The City also convened meetings with local stakeholders on these issues. TFHC looks forward to seeing enforcement and to continued collaboration with the City to implement the local SOI discrimination law.

Reporting period: July 2023 through December 2023

- The Fair Housing Center continues the discussion with the City as described above. TFHC may draft a potential update to local laws to further this work. This could be modeled on the enforcement systems used in Dayton, Ohio as an example.

Reporting period: January 2024 through June 2024

- The City plans to implement funding for source of income testing to be conducted by The Fair Housing Center. This funding will help The Fair Housing Center test for discrimination based on source of income, a major next step for implementation of this local law.

Final Report

As an important update, the City has provided The Center with a grant to perform fair housing testing to specifically identify source of income discrimination. With this funding, The Center has already provided one report identifying source of income discrimination trends.

Fair Housing Issue: Source of income discrimination and voucher mobility

Goal: Increase voucher mobility

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Discuss voucher mobility improvements and what support the PHA may need	City to offer support and convene discussions as appropriate to review issues	LMH	TFHC will attend discussions	First half of FY 2020
Develop schedule for next steps in evaluation	In consultation with LMHA, determine if SAFMR is feasible or if other mobility improvements are possible	LMH	TFHC to provide technical support if needed	Second half of FY 2020
Implement strategies	Providing support as needed	LMH	TFHC to provide support if possible	Second half of 2021

Discussion:

Reporting period: July – September 2020 & October – December 2020

An ordinance prohibiting discrimination based on source of income—initially introduced to Toledo City Council in 2018 but not acted upon—was reintroduced in the fall of 2020. The legislation updates the City of Toledo's already existing anti-discrimination ordinance to include source of income as an additional protected class, effectively requiring housing providers to accept all legal, reliable sources of income including disability and military benefits, Social Security, and Housing Choice Vouchers (HCV). Public hearings were held by City Council, including a Neighborhoods Committee meeting and a Committee of the Whole meeting, which featured presentations from several community partners and allowed for public input. The legislation received support from organizations including TFHC, LMH, The Ability Center, ABLE, TLCHB, MHR SB, UPSE, and United Way of Greater Toledo. Many landlords and property owners expressed opposition to the ordinance, citing a reluctance to accept vouchers and participate in the HCV program. Legislation passed in December 2020 and goes into effect 120 days after passage. Partners including TFHC and LMH are developing an educational campaign to inform housing providers about the ordinance, in an effort to address FAQs, help housing providers become more familiar with the HCV program,

and encourage compliance. Plans include distributing informational documents and hosting an online training session.

Reporting period: January – March 2021 & April – June 2021

- TFHC and LMH collaborated to conduct a virtual informational session in March 2021 via Zoom and Facebook Live. Geared towards housing providers, the session provided an overview of the requirements of the SOI anti-discrimination ordinance and the housing choice voucher program, addressed common concerns, and answered questions from attendees. TFHC and LMH also developed educational materials for distribution to the community. In addition, TFHC incorporated information about SOI into its training curriculum that is utilized on an ongoing basis to educate housing providers and community members about fair housing rights and responsibilities.
- TFHC is accepting complaints and compiling relevant data related to instances of SOI discrimination.
- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement of SOI and other local civil rights protections. To assist in this effort, TFHC is conducting research to determine what methods other cities are employing to enforce local anti-discrimination ordinances.

Reporting period: July - September 2021 & October - December 2021

- TFHC regularly investigates allegations of discrimination based on source of income.
- TFHC assists housing providers in complying with SOI protections by conducting trainings, distributing educational materials, and providing guidance on policies and practices.
- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement of SOI and other local civil rights protections.

Reporting period: December 2021 through January 2023

- Enforcement of the local SOI protections, as described above, will likely help with voucher utilization and mobility. Developments with SOI protections are relevant to this action plan items as well.
- LMH recently reported that it is implementing a limited SAFMR to increase flexibility of voucher payment standards to improve access to other neighborhood areas.

Reporting period: January 2023 through June 2023

- No additional updates at this time. The work described above is ongoing.

Reporting period: July 2023 through December 2023

- No additional updates at this time. The work described above is ongoing.

Reporting period: January 2024 through June 2024

- No additional updates at this time. The work described above is ongoing.

Final report

The Fair Housing Center has scheduled a meeting with LMH to discuss issues they have seen with recent calls from LMH voucher holders. They report that they are facing difficulties with communicating with LMH staff especially during the moving process or when a move may be necessary due to housing conditions issues.

Goal: Enforce Fair Housing protections

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
TFHC to enforce Fair Housing Act	City to provide assistance and resources as appropriate to support enforcement work		TFHC will implement its enforcement work through direct client representation and in other matters	Ongoing

Discussion:**Reporting period: July – September 2020 & October – December 2020****TFHC Enforcement Summary:**

- Total new cases: 26

By protected class:

17 Disability
4 National Origin
2 Race
3 Sex

By issue:

2 Harassment
21 Rental
2 Sales
1 Zoning

- Total number of persons impacted from successfully resolved cases: 44 persons
- 767 Referrals

Reporting period: January – March 2021 & April – June 2021**TFHC Enforcement Summary:**

- Total new cases: 65

By protected class:

2 Color
37 Disability
3 Familial Status
2 National Origin
16 Race
1 Religion
4 Sex

By issue:

64 Rental
1 Sales

- Total number of persons impacted from successfully resolved cases: 17 persons
- 712 Referrals

Reporting period: July - September 2021 & October - December 2021

- Total new cases: 57

By protected class:

39 Disability
0 National Origin
13 Race
5 Sex

By issue:

0 Harassment
56 Rental
1 Sales
0 Zoning

- Total number of persons impacted from successfully resolved cases: 3,405 persons
- 1,141 Referrals

Reporting Period: December 2021 through January 2023

Total number of intakes: 2847

Total new fair housing cases opened: 165

By protected class:

107	Disability
4	National Origin
28	Race
7	Sex

By issue:

0	Harassment
133	Rental
4	Sales
1	Zoning

- Total number of persons impacted from successfully resolved cases: 13,391 persons

Reporting Period: January 2023 through May 2023:

Note that this reporting period is a shorter timeframe as compared to the previous period, and therefore includes a lower number of cases by comparison to the previous period.

Total number of intakes: 672

Total new fair housing cases opened: 36

By protected class:

28	Disability
0	National Origin
5	Race
2	Sex

By issue:

1	HOA
35	Rental
4	Sales

- Total number of persons impacted from successfully resolved cases: 557 persons

Reporting Period: June 2023 through December 2023:

Total number of intakes: 757

Total new fair housing cases opened: 70

By protected class:

60	Disability
0	National Origin
7	Race
2	Sex
1	Familial Status

By issue:

0	HOA
69	Rental
1	Sales

- Total number of persons impacted from successfully resolved cases: 6,866 persons

Reporting period: January 2024 through June 2024

The work described above is ongoing with very similar numbers as those provided in the previous report. The reporting period for our HUD private enforcement initiative grant will close soon, and in the next regular FHAP report, The Fair Housing Center will provide updated numbers.

Final Report

The Fair Housing Center continues to report its cases including the rate of different forms of discrimination to the City, HUD, and the National Fair Housing Alliance. The statistics provided above show ongoing trends that remain fairly consistent over time, with the most recent trends provide din the 2025-2030 AI.

Fair Housing Issue: Increase awareness of fair housing rights and responsibilities

Goal: Engage in education and outreach activities

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Conduct fair housing trainings and presentations	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	TFHC will coordinate and manage	Ongoing, reported quarterly
Distribute fair housing educational materials	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	TFHC will coordinate and manage	Ongoing, reported quarterly
Place advertisements and seek media coverage of fair housing issues		Local media outlets, including print, television, radio, and digital	TFHC will coordinate and manage	Ongoing, reported quarterly
Participate in outreach events			TFHC will coordinate	Ongoing, reported quarterly

			and manage	
Post fair housing information on website and social media	Mayor's office will share content as appropriate		TFHC will coordinate and manage	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 3,489,762
- Distribution of fair housing brochures and educational materials: 17,522
- Trainings conducted: 15
 - Persons trained: 208

Reporting period: January – March 2021 & April – June 2021

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 12,128,322
- Distribution of fair housing brochures and educational materials: 362
- Trainings conducted: 46
 - Persons trained: 3,250

Reporting period: July - September 2021 & October - December 2021

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 3,723,108
- Distribution of fair housing brochures and educational materials: 15,124
- Trainings conducted: 21

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- Persons trained: 383

Reporting Period: December 2021 through January 2023

During this timeframe, The Fair Housing Center recorded the following outreach activities within these periods:

January – March 2022 & April – June 2022

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 18,334,745
- Distribution of fair housing brochures and educational materials: 2,838
- Trainings conducted: 31
 - Persons trained: 1,055

July - September 2022 & October - December 2022

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 1,337,488
- Distribution of fair housing brochures and educational materials: 10,410
- Trainings conducted: 18
 - Persons trained: 392

Reporting period: January 2023 through May 2023:

January – May 2023

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 12,268,086
- Distribution of fair housing brochures and educational materials: 2,381
- Trainings conducted: 17
 - Persons trained: 401

Reporting period: June 2023 through November 2023:

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 3,702,371
- Distribution of fair housing brochures and educational materials: 9,485
- Trainings conducted: 8
 - Persons trained: 168

Reporting period: January 2024 through June 2024

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 7,494,549
- Distribution of fair housing brochures and educational materials: 9,724
- Trainings conducted: 12
 - Persons trained: 288

Final Report

The Fair Housing Center continues to report its education and outreach activities to the City, HUD, and the National Fair Housing Alliance. The statistics provided above show ongoing trends that remain fairly consistent over time, with an increase in impressions in the most recent report.

Fair Housing Issue: Voucher Mobility

Goal: LMH should adopt the Poverty Race Research Action Council's recommendations to increase voucher mobility

Measurable objectives	City Department Responsible	Other Institutions	TFHC's role	Deadline
Landlord development	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH, Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	Advocacy for policies that support the HCV program, provide education to housing providers	Ongoing, reported quarterly
Target population outreach	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH	Advocacy for policies that support the HCV program, provide education to housing providers	Ongoing, reported quarterly
Pre-search counseling	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Housing search assistance	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Post-move support	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Explore Small Area Fair Market Rents (SAFMRs)	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH	Advocacy for policies that support the HCV program	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

No updates this reporting period.

Reporting period: January – March 2021 & April – June 2021

LMH has been working with the local Continuum of Care regarding the Emergency Voucher Program to make vouchers available to homeless or those in threat of homelessness. This is a new HUD initiative that LMH is developing and will be implementing until the vouchers are distributed within the next 18 months.

Reporting period: July - September 2021 & October - December 2021

Update from LMH: Emergency Voucher Program is still moving forward, more updates expected next quarter.

Reporting period: December 2021 through January 2023

- As mentioned above, LMH has implemented a small area FMR program, which is consistent with a PRRAC recommendation.

Reporting period: January 2023 through June 2023

- No further updates at this time. The work described above is ongoing.

Reporting period: July 2023 through December 2023

- See notes further above that LMH has changed its criminal history screening policies related to vouchers and had adopted SAFMR standards.

Reporting period: January 2024 through June 2024

- No additional updates at this time. See notes above.

Final Report

TFHC and LMH plan to meet soon to review trends TFHC has seen in callers with issues in communications with LMH.

Fair Housing Issue: Land Use and Zoning

Goal: Change policies to welcome the development of affordable, group, permanent supportive, and recovery housing

Measurable objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review current policies and recommend changes	Plan Commission	MHR SB	Provide input on policy revisions	First half of FY 2020
Present proposed changes for approval	Plan Commission, City Council	MHR SB	Advocate for policy changes during public hearings	Second half of FY 2020
Consider neighborhood input on proposed projects that negatively impact historically disinvested areas	Plan Commission, City Council	MHR SB	Advocate for policy changes during public hearings	Ongoing, reported quarterly
Grant reasonable accommodations when applicable	Plan Commission, City Council	MHR SB	Advocacy and support for persons requesting accommodations	Ongoing, reported quarterly
Educate the public about the City's reasonable accommodation policy	Plan Commission, Department of Neighborhoods	Ability Center	Educate tenants and landlords	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

- Community partners including TFHC, ABLE, MHRSB, and The Ability Center have repeatedly submitted testimony and comments to the Plan Commission and City Council regarding the City's zoning regulations, expressing concerns that the regulations are overly restrictive as it pertains to housing for persons with disabilities. These organizations have also provided letters and comments of support for several specific supportive housing projects that have come before the Plan Commission and City Council for approval. These proposed projects have often faced NIMBYism from neighbors who express opposition on the basis of unfounded fears and stigmas about the residents.
- This group of community partners has also been conducting research and discussing amendments to the City of Toledo's zoning code to bring it more in alignment with fair housing and ADA guidelines. An ordinance has been drafted which removes outdated and offensive language, redefines group living categories, eliminates unnecessary permitting restrictions, and establishes an exception for Reasonable Accommodations. The ordinance will be proposed to City Council/Plan Commission for input and approval.

Reporting period: January – March 2021 & April – June 2021

- Community partners and the Plan Commission have held several meetings to discuss and make revisions to the group living ordinance described above. The legislation is currently under review by the City of Toledo law department.
- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. Discussion has included consideration of an ordinance that would increase the required number of accessible units for any newly constructed federally subsidized housing developments.

Reporting period: July - September 2021 & October - December 2021

In October 2021, Toledo City Council approved Warren Commons, a proposed 46-unit permanent supportive housing project to provide safe, stable housing options for individuals who are experiencing homelessness, returning from incarceration, in recovery, or diagnosed with mental health conditions. The project will support residents by connecting them to local services and resources including education, employment, and health care. The \$11 million development is a partnership of TASC of Northwest Ohio and Community Housing Network. The project received competitive low-income

housing tax credits from the Ohio Housing Finance Agency to help fund its construction. Tenants will receive housing-choice vouchers through Lucas Metropolitan Housing to cover their rent. The proposal received support from many local organizations including TFHC, MHR SB, and TLCHB but many neighbors expressed opposition.

Reporting period: December 2021 through January 2023

- Changes to the zoning code to better welcome group homes are still needed. The City has proposed legislation before it to accomplish this goal, but the legislation is presently pending in committee.
- Proposals for affordable housing continue to arise, and the City has been more successful than not in welcoming these developments. However, the developments continue to experience opposition and the rate of the development new affordable units is not sufficient considering the significant need for affordable housing in the Toledo area.

Reporting period: January 2023 through June 2023

- The legislation necessary to update the zoning code is still pending before City Council. TFHC continues to ask the City to please move forward with the necessary changes to the law as soon as possible.

Reporting period: July 2023 through December 2023

- Unfortunately, the legislation necessary to update the zoning code is still pending before City Council. TFHC continues to ask the City to please move forward with the necessary changes to the law as soon as possible.
- Recently the City with other partners applied for a grant that requests funding for assistance in redeveloping the zoning code to better encourage the development of housing in the area. The Center submitted a letter of support for this application that also indicates the need for this work.

Reporting period: January 2024 through June 2024

- The Fair Housing Center is currently undertaking work necessary to create a new Analysis of Impediments to Fair Housing Choice. In that report, The Center will highlight the need for this change to the local zoning code, as described above.

Final Report

Most recently the Director of Toledo's Plan Commission indicated a willingness to reengage discussions over changing rules for zoning related to group homes. The Center hopes to return to these discussions and make changes to the group home zoning rules.

Fair Housing Issue: LGBTQIA+

Goal: Adopt changes to policies and practices to ensure adequate protections for LGBTQIA+ individuals

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Establish an effective enforcement process to address complaints	City Council	Equality Toledo	Provide input on policy changes	Second half of FY 2020
Present proposed changes for approval	City Council	Equality Toledo	Advocate for policy changes during public hearings	Second half of FY 2020
Utilize enforcement process to address complaints	City administration	Equality Toledo	Advocacy and support for victims of discrimination	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

No updates this reporting period.

Reporting period: January – March 2021 & April – June 2021

- In February 2021, HUD issued a memo stating that it will begin accepting complaints of housing discrimination based on sexual orientation and gender identity. Based on the Supreme Court decision *Bostock v Clayton County* and the corresponding Executive Order from President Biden, HUD concluded that the Fair Housing Act's recognition of sex as a protected class should be extended to include sexual orientation and gender identity, which means the Fair Housing Act can be enforced to prohibit sexual orientation and gender identity discrimination.
- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement local civil rights protections such as sexual orientation and gender identity.

Reporting period: July - September 2021 & October - December 2021

- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement local civil rights protections such as sexual orientation and gender identity.

Reporting period: December 2021 through January 2023

- As mentioned above, the created a new Landlord-Tenant Services manager position. This position has, as one of its duties, the role of ensuring that local civil rights protections are enforced. This includes the local protections to prohibit sexual orientation and gender identity.

Reporting period: January 2023 through June 2023

- As described above, the City is working on ways to enforce the SOI laws under its local anti-discrimination law. This will likely have an added positive impact for enforcement of local anti-discrimination laws related to sexual orientation and gender identity. Once enforcement processes are established, this could positively impact these protected classes as well.

Reporting period: July 2023 through December 2023

- See prior description. The Fair Housing Center is working with the City to advocate for the development of additional processes to pursue discrimination cases through local laws which would benefit the LGBTQ+ community as well.

Reporting period: January 2024 through June 2024

- See prior description. No additional information on this yet, though with the implementation of funding for SOI testing, it is likely that we will see local progress on creation of a system for enforcement as described above.

Fair Housing Issue: Homelessness and Affordable Housing

Goal: Coordinate with private and government partners to create affordable housing and advance No Barriers Housing

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Identify incentives to encourage affordable housing development	City administration, Department of Neighborhoods	LISC, LMHA	Advocacy for projects that support local housing needs	Ongoing, reported quarterly
Direct discretionary funds toward affordable housing	Department of Neighborhoods, City Council		Advocacy for projects that support local housing needs	Ongoing, reported quarterly
Provide administrative support for the "No Barriers Housing" initiative	Department of Neighborhoods, City administration	TLCHB, MHR SB, LMH, Lucas County Commissioners	Participate in committee meetings	Ongoing, reported quarterly
Provide financial support for the "No Barriers Housing" initiative	Department of Neighborhoods, City Council	TLCHB, MHR SB, LMH, Lucas County Commissioners	Advocacy for funding that supports local housing needs	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

No updates this reporting period.

Reporting period: January – March 2021 & April – June 2021

- City of Toledo is supporting and funding a collaborative effort between Toledo Public Schools, Toledo Lucas County Homelessness Board, and Lutheran Social

Services to provide rental assistance and supportive services for 12 months to 75 TPS families at risk or experiencing homelessness.

- City of Toledo is supporting and partially funding the development and implementation of TLCHB's Housing Problem Solving Pilot Program, which is a person-centered approach that will enhance the Continuum of Care's prevention, diversion, and rapid resolution activities.
- No Barriers Housing initiative is currently working with Continuum of Care providers to implement the HUD Housing First Standards Assessment Tool, which will allow for monitoring to ensure system-wide fidelity to housing first principles.
- TLCHB has established a Landlord Risk Mitigation Fund to support the No Barriers Housing initiative through landlord engagement and incentives.

Reporting period: July - September 2021 & October - December 2021

No updates this reporting period.

Reporting period: December 2021 through January 2023

- No further updates for this reporting period. The developments described above are still underway.

Reporting period: January 2023 through June 2023

- The TLCHB recently proposed a reorganization of the local continuum of care. TFHC's CEO has applied to serve on a newly created board to help facilitate this process.

Reporting period: July 2023 through December 2023

- TLCHB has implemented a newly reorganized continuum of care. The Fair Housing Center, through its CEO, is a member of the executive committee of the new COC.

Reporting period: January 2024 through June 2024

- No further updates at this time.

Final report

No further updates, as TLCHB has made significant progress in this effort.

Fair Housing Issue: Housing Conditions

Goal: Change policies and practices to ensure access to housing that is safe, healthy, and habitable

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Enforce housing code violations	Department of Neighborhoods	Housing Court	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Secure staff and resources needed to implement the lead ordinance	City administration, Department of Neighborhoods	TLPPC, Health Department	Advocacy for effective implementation	First half of FY 2020
Effective enforcement of the lead ordinance	City administration, Department of Neighborhoods	TLPPC, Health Department	Education and outreach to tenants and housing providers	Ongoing, reported quarterly
Eliminate barriers to accessing grant funding for home rehab/repairs	Department of Neighborhoods		Advocacy for policy changes that improve access to housing assistance	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

Update from the Toledo Lead Poisoning Prevention Coalition (TLPPC): TLPPC has been holding regular meetings with the City's Lead Safe Coordinator to help ensure the successful enforcement and implementation of the Lead Ordinance. They are working on forming committees to focus on efforts including education and outreach and workforce development.

Update from Stephanie Beebe, who began position as Lead Safe Coordinator for the City of Toledo on Sept. 1, 2020:

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- Developed lead-safe marketing campaign with Will Lucas of Creadio to be implemented through 2021. Coordinated meetings between Will and multiple community stakeholders, including TLPPC. Implementation plan completed in Jan 2021, to be presented to TLPPC Feb 16, 2021.
 - Launched Toledo Lead Safe Website (www.ToledoLeadSafe.com) Oct 2020 for Lead Poisoning Prevention Week. Ongoing content development and added features throughout 2021.
 - Created processes with Health Department for lead-safe certification and local inspector registration. Paper applications for lead-safe certificates launched November 2020, with local inspector applications launching January 2021. As of now, fully online versions for these applications are in process with an expected launch of March 2021.
 - Coordinated back-end process of lead-safe certification tracking for eventual enforcement via Dept of Neighborhoods Code Enforcement in CityWorks management system. This was finalized and launched in January 2021, with grandfathered lead-safe certificates now being entered and processed.
 - Created and launched Workforce Development group in partnership Ohio Means Jobs, local inspectors, small business program administrators, and Toledo Rotary. Launched private training for inspectors in coordination with Lead Experts in February 2021. More trainers to follow in coming months as we also roll-out programs to help support inspectors and contractors doing lead work.
 - Established and launched Owner Advisory group to open communication between owners, the City, and the Coalition to discuss concerns, new programs, and work together for successful ordinance implementation.
 - Developed and submitted for multiple grant opportunities to support lead-safe programming in Toledo. Such as the Early Bird Match Grant from the Dept of Neighborhoods to be launched February 2021 to encourage property owners to comply with lead ordinance early by incentivizing repairs and compliance inspections. Also received grant from Greater Toledo Community Foundation in January 2021 to support my position as Lead Safe Coordinator in coordinating this work through multiple agencies and refining processes to work together for better service delivery.
 - Gearing up for first enforcement date of the Lucas County Auditor's Rental Registry on June 30th, 2021. We have piggybacked on the Auditor's statutory requirement to have rental properties in Toledo registered by making that one of our lead-safe certification requirements. Code Enforcement will be able to enforce this registration administratively, but the public registry is still pending launch on the Auditor's AREIS website.

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- Update from Stephanie Beebe, Lead Safe Coordinator for the City of Toledo:
 - Ongoing implementation of lead-safe marketing campaign with Will Lucas of Creadio. Presented implementation plan to TLPPC in Feb. 2021, and have since rolled out OdEds in print and coordinated multiple radio/print/web interviews. Currently in process of finalizing 3-part video “docu-series” for TV release, radio PSAs for landlords and tenants, and a \$10,000 billboard campaign focused around lead-safety and lead-ordinance awareness.
 - Continued development and expansion of Toledo Lead Safe Website (www.ToledoLeadSafe.com). New features include: online lead-safe certificate applications, early bird match grant applications, FAQs and “one-stop shop” resources for rental owners, occupants, and inspectors.
 - Streamlined process with Health Department for lead-safe ordinance. Paper and online applications available. **All grandfathered certificates** mailed in June 2020, and new certificates being processed now.
 - Back-end process to track lead-safe certification complete in CityWorks management system. Continued working with Dept of Neighborhoods Code Enforcement for eventual enforcement of program after June 30, 2022 initial phase-in. Currently working to enforce the Rental Registry portion with the Lucas County Auditor’s collaboration (more below on that).
 - Workforce Development Committee continuing to meet monthly. New Lead Workforce Development Training Program being drafted to provide subsidized training and licensure to local lead inspectors, abatement contractors/workers, and RRP trainees. Also planning to launch both virtual and in-person information meetings for inspectors at large.
 - Owner Advisory group continuing to meet monthly. Currently planning to launch both virtual and in-person informational meetings for rental owners at large.
 - Received \$1 mil grant from HUD in April 2021 for “Healthy Homes and Weatherization Cooperation Demonstration” to provide comprehensive and coordinated service delivery between Dept of Neighborhoods’ Lead Hazard Control program and NeighborWorks Toledo’s Weatherization Assistance program. These funds will go to fill gaps that the two individual programs may be unable to address and also streamline coordination between the two entities.
 - Launched Early Bird Match Grant in February 2021 to provide rental owners assistance with compliance costs under the lead ordinance.
 - Coordinated partnership for BP Husky Settlement grant with Toledo-Lucas County Health Department. This will provide an additional \$1.2 mil of funding to be braided with the Dept of Neighborhoods’ current Lead Hazard Control

grant program.

- Launched rental registry education and enforcement with help of Lucas County Auditor on June 30th, 2021. Working with Code Enforcement and the Auditor to develop best practice enforcement tools on how to partner as registering rental properties in Toledo is Step #1 to becoming lead-safe and assuring we have accurate data of rentals in our community.
- TLPPC formed the Community Engagement/Education Subcommittee to increase awareness and knowledge among community members regarding lead poisoning beginning with primary prevention for lead safe environments for children. Members include representatives from healthcare systems, educational systems, pediatricians/healthcare providers, school nurses, housing, parents of lead-affected children, city/county government and legal representation. Activities completed and in progress during this reporting period:
 - Formation of subcommittee with 14 members
 - Regular email communications with subcommittee members assessing progress of work, questions, and concerns
 - Development of brochures and handouts for health professionals
 - Flyer created for parents/guardians by Lucas County Family Council including resources regarding screening young children and lead safe housing
 - Meetings scheduled with school nurse and advisory board of Escuela Smart TPS bilingual elementary school to initiate blood lead level screenings for children K to 8th grade and educational sessions for parents/guardians
 - Training meeting, 2 hours per Zoom, provided June 16, 2021 by Dr. Marilynne Wood for Health Connections Advisory Group
 - Discussions with ProMedica Health, Paramount and St. Vincent Mercy Health System regarding work of the TLPPC and coordination of community blood lead level screenings and lead poisoning prevention education for families
- The Lucas County Land Bank and the City hired a consultant to assess Toledo's code enforcement needs and recommend how the city can more effectively and equitably address nuisance properties and code violations. Findings were presented to City Council in March 2021. Recommendations included:
 - The City should move away from being reactive and relying on housing court to instead encourage voluntary compliance.
 - The City should form a neighborhood conditions working group so multiple interested parties can share information about problem properties, prioritize issues, and work together to bring a resolution.

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- The City should offer home repair grant and loan programs to offset the financial burden of compliance for property owners.

Reporting period: July - September 2021 & October - December 2021

Update from Stephanie Beebe, Lead Safe Coordinator for the City of Toledo:

- **LEAD COMMUNICATIONS PLAN DEVELOPMENT AND IMPLEMENTATION:** Continued development and implementation. Approved \$160,000 budget for 2022 ad spend and content creation. Billboard, radio, video, and social media campaigns being quoted and booked. Additional add of Children's Board Book distribution through childhood and healthcare partners. Completed filming of video docu-series and released parts 1, with parts 2 and 3 to release Q1 2022.
- **ONGOING WEBSITE UPDATES:** ToledoLeadSafe.com continues to be developed as new information rolls out. Recent additions include News page, Residents page, complete FAQ overhaul, and video trailer inclusion.
- **ONGOING ORDINANCE PROCESSING:** Working with code enforcement and health department to continue to process and streamline new applications, reminder letters, and fines/penalties as applicable to the lead-safe and rental registry ordinances. Approximately 23,000 letters being sent in Q1 2022 to rental owners to remind them of compliance requirements. To date, approximately 1,900 Lead-Safe Certifications and 19,000 Rental Registrations active in Toledo.
- **HIRING PERSONNEL:** Posted job opening for Lead Enforcement Specialist to work with Lead Safe Coordinator and Code Enforcement to handle program administration and fines/penalty processing.
- **WORKFORCE DEVELOPMENT:** Lead training program approved \$234,460 budget to train and license lead inspectors, lead abatement workers, and Renovation, Repair, and Painting (RRP) certified individuals to support lead work and ordinance. Over 300 students will be trained through this entire program. Schedule and details to be launched. Enrollment through community referral basis only. Attempting to develop additional building trades pipeline with Cherry St Mission, Goodwill, Northwest College, Owens, and others at monthly roundtable discussion.
- **GRANT/LOAN PROGRAMS IMPLEMENTATION:** HUD Lead Hazard Abatement and BP Husky grants continue to be administered through Department of Neighborhoods. Beginning application process for Toledo Healthy Homes and Weatherization Cooperation Demonstration (THHWCD) grant in partnership with NeighborWorks—finalized all healthcare partner trainings and opened to referrals. Concluded Toledo Community Foundation grant for lead-safe coordinator staffing role.
- **OUTREACH:** Ongoing outreach, communication, and partnership building with Toledo Lead Poisoning Prevention Coalition, Owner Advisory Group, Lucas Metropolitan Housing, Lucas County Land Bank, Mercy, ProMedica, other healthcare and pediatricians, TPS, early childhood education resources, Help Me

Grow, Ohio Department of Health, Governor's Lead Advisory Council, Ohio Healthy Homes Network, NeighborWorks, Historic South Initiative, Maumee Valley Habitat, etc.

Reporting period: December 2021 through January 2023

- The same attorney who previously represented landlords in filing a lawsuit to stop the enforcement of the local lead poisoning prevention law has again filed suit representing another landlord to stop the law. In response, the City proposed to change some aspects of the law. These changes made the law stronger in some respects.
- The lawsuit continues but has not, as of yet, stopped the ultimate goal of enforcing the local lead law. Presently, the law is scheduled to begin enforcement in March, 2023. The Fair Housing Center with many other community groups continues to monitor enforcement of the law.

Reporting period: January 2023 through June 2023

- The City was recently successful in the lawsuit described above in that a temporary restraining order was lifted, allowing the City to enforce the local lead poisoning prevention law. TFHC and others hope the City will promptly move forward with enforcement of the local law.

Reporting period: July 2023 through December 2023

- As an additional update, The Fair Housing Center has successfully developed a new program where it provides assistance to tenants facing housing conditions issues. The program has met tremendous demand from tenants and significant success. The program is currently seeking additional funding to sustain its success and potentially expand.

Reporting period: January 2024 through June 2024

- The City will provide The Fair Housing Center with funding to act as a fiscal agent for a new entity to be created that will be a "Lead Resource Center" that provides significant services and supports for local residents to prevent lead poisoning. This will include lead screenings and work necessary to abate lead hazards.

Final Report

The Center has helped successfully create a new Lead Resource Center thanks to support from the City and the leadership of the Toledo Lead Poisoning Prevention Coalition. This, along with significant steps by the City to begin enforcement of the local lead poisoning prevention law show excellent progress in addressing this barrier. The Fair Housing Center has also continued to successfully implement its housing conditions and neighborhood reinvestment program.

Fair Housing Issue: Public Transportation

Goal: Lead efforts to adopt and expand county-wide transportation system

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Outreach to suburban jurisdictions to encourage participation	City Council, City administration	TARTA, Lucas County Commissioners, Chamber of Commerce, CATR, Ability Center	Advocacy for expansion of transportation	Ongoing, reported quarterly
Support sales tax ballot initiative to increase funding and expand TARTA services	City Council, City administration	TARTA, Lucas County Commissioners, Chamber of Commerce, CATR, Ability Center	Advocacy for expansion of transportation	Ongoing, reported quarterly
Offer alternative transportation options	City administration	TARTA, Lucas County Commissioners, Chamber of Commerce, CATR, Ability Center	Advocacy for expansion of transportation	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

CATR worked to create a group of interested Sylvania Township residents to encourage the trustees to support the sales tax initiative in Nov. 2020. Although Sylvania Township did pass the resolution, it was Maumee who voted it down in 2020, preventing it from going on the ballot in November. CATR has discussed and plans to reach out to legislators in Maumee to educate them and advocate for county wide public transit for the next or a future election.

Reporting period: January – March 2021 & April – June 2021

The Ohio transportation budget signed in March 2021 included a provision to reduce the requirement from unanimous to majority approval of current member jurisdictions to admit Lucas County as a new member. This advanced efforts to expand TARTA's service county-wide, as previous efforts failed due to the rejection of the measure by just one of the seven current member jurisdictions.

TARTA sought approval from its seven member jurisdictions and received approval from six (all except Maumee), meeting the majority requirement. TARTA's board then voted to officially admit Lucas County as a new member and place the sales tax measure on the November ballot.

The ballot measure will convert TARTA's funding source from property tax to sales tax and increase Lucas County sales tax by 0.5%. If approved by Lucas County voters, the measure would increase TARTA's revenue to enable the expansion of services to the entire county and ensure broader access to public transportation throughout the region.

Reporting period: July - September 2021 & October - December 2021

- In November 2021, voters approved a ballot measure to switch TARTA's funding source from property tax to sales tax and increase Lucas County sales tax, thereby generating additional revenue to support the expansion of TARTA's services.
- Launch of TARTA Next project, a comprehensive operations analysis that will take a broad and detailed look at TARTA's network, with the goal of improving existing system and services. Goals include: redesigning bus services to match the way people travel in the Toledo area, making it easier and faster for more people to get to work, and creating more opportunities to use TARTA for different kinds of trips.

Reporting period: December 2021 through January 2023

- The effort to expand TARTA county-wide has been successful and TARTA is now funded by sales taxes to operate county-wide.
- An important question now, however, is whether TARTA will develop routes that best assist the low-income families that rely on public transportation the most, as well as county-wide paratransit to assist persons with disabilities.

Reporting period: January 2023 through June 2023

- TARTA is continuing to develop new routes. TFHC plans to monitor the development of these routes in the hopes of seeing them provide new opportunities for minority and low-income families and neighborhood areas.

Reporting period: July 2023 through December 2023

- TARTA is continuing to develop new routes. One new route, for example, now extends to Oregon, Ohio. TFHC plans to monitor the development of these routes in the hopes of seeing them provide new opportunities for minority and low-income families and neighborhood areas.

Reporting period: January 2024 through June 2024

- TARTA should also consider adopting policies for county-wide paratransit. This point may be highlighted further in the next FHAP current being written. Many residents otherwise report significant improvements to public transit.

Final Report

Transportation access continues to be a critical housing issue in the Toledo area. While much progress occurred in the 2020-2025 period, much remains to be seen, and this issue remains in the 2025-2030 AI.

Fair Housing Issue: Impediments in Rental Housing

Goal: Address the eviction crisis in Toledo

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Educate tenants and housing providers about rights and responsibilities	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LAWO	Assist clients through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Provide emergency housing and financial assistance for those displaced due to eviction	City Council, Department of Neighborhoods	2-1-1, Pathway, Catholic Charities, Salvation Army, TLCHB, LMHA	Connect clients to community resources	Ongoing, reported quarterly
Increase legal representation for tenants in Housing Court		LAWO	Assist clients through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Stricter enforcement of housing code violations	Department of Neighborhoods	Housing Court	Assist clients through the Landlord Tenant Mediation Program	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

- As part of its new Landlord-Tenant Mediation program, TFHC conducted recurring Facebook live trainings to educate tenants and landlords on their rights and responsibilities.
- The City of Toledo and other agencies are currently providing emergency rental assistance and plan to continue these programs as funds are available. However, these programs must be improved and increased. Accessing the program can be difficult. Requirements for these programs that the City adds

locally and that HUD does not require must be removed. Wherever possible, the City should increase funds available.

- TFHC provided referrals and support to callers by connecting them to service providers offering rental assistance. When the federal government issued an eviction moratorium due to the COVID-19 pandemic, TFHC informed tenants about these protections and created a document to assist tenants in understanding and asserting their rights. TFHC also created and maintains a dedicated page on its website with information and links to housing-related resources during the pandemic.
- TFHC approached the Toledo Municipal Court to discuss increasing the filing fee to increase legal representation for tenants in Court and make other changes. These discussions are ongoing. The City of Toledo should support and advocate for increased representation in Court as well.
- TFHC has made a public records request to better understand the enforcement of the local housing code. Unfortunately, the City does not specifically track whether the person requesting code enforcement is a renter or a homeowner. We do know anecdotally, however, that renters often face significant challenges when attempting to complain about a housing code violation by their landlord. The City should track this data and work to be better responsive to tenant complaints about housing code violations.

Reporting period: January – March 2021 & April – June 2021

- The Fair Housing Center assisted the University of Toledo and ABLE in completing a study covering evictions and eviction trends in the Toledo, Ohio area. The study reviews more than 24,000 evictions in the Toledo area over a four-year period. It analyzes the harm of geographic location and impact of the evictions, as well as the relationship between race and other demographic information related to the evictions. The focus of the study was on the relationship of evictions and mental health disabilities and includes trends identified through interviews with mental health service providers serving persons with mental health disabilities. Now, this information can be used to guide policy advocacy including efforts to advance the goals of the Fair Housing Act as part of the City of Toledo's Analysis of Impediments to Fair Housing Choice. [Read more about the study.](#)
- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. An ordinance has been drafted and discussed to implement Right to Counsel, ensuring income-qualifying tenants have access to legal representation in Housing Court. A budget has also been developed by LAWO to determine the funding needed for attorneys and other resources to support the program. Right to Counsel has proven successful in other cities to help tenants better understand and assert their rights, thereby preventing unnecessary evictions. It's expected to be introduced to City Council in August.

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- The recipient of federal COVID relief funding, the City of Toledo and Lucas County collaborated to launch a second round of emergency rental assistance, allocating \$11,507,996 for direct rental assistance to benefit income-eligible tenants in Toledo and Lucas County. The new program will assist low- to moderate-income households in the city and county with up to 12 months emergency rental assistance, which may include payment for current and future rent, past due rent, late fees, new renter fees, security deposits, and utility deposits and payments. Attempts were made to correct some of the barriers identified in previous rental assistance programs by removing unnecessary requirements, establishing a centralized intake process, and offering applications online. Financial assistance is a critical tool to help preserve housing stability for tenants and avoid eviction, displacement, and homelessness.

Reporting period: July - September 2021 & October - December 2021

- In September 2021, Toledo City Council approved a Right to Counsel ordinance, ensuring low-income tenants will have legal representation in eviction court. Services will be provided by LAWO.
- TFHC continues to operate its Pre-Litigation Landlord Tenant Mediation Program for residents of Lucas County, offering free, confidential mediation services to resolve rental disputes and prevent evictions.
- In December 2021, the City of Toledo and Lucas County announced the relaunch of its rental assistance program. An additional \$10 million is being made available to assist low to moderate-income households in the city and county with up to 18 months of rent, utility, and internet support. That may include payment for current and future rent, past due rent, late fees, new renter fees, security deposits, and utility deposits and payments.

Reporting period: December 2021 through January 2023

- The City has continued its efforts to better fund legal aid to represent more tenants in eviction actions.
- The City continues its work to provide rental assistance as well.

Reporting period: January 2023 through June 2023

- The City and TLCHB recently hosted an event to bring the community up to speed on the latest developments with eviction prevention. The Fair Housing Center participated and presented in the event.
- The Center has also recently developed a program where tenants receive assistance from an attorney at the Center with housing conditions cases. The program has been extremely successful, filling a significant gap in services locally.

Reporting period: July 2023 through December 2023

- The Fair Housing Center's new housing conditions program has been extremely successful and is seeking funding to sustain and expand the program.

Reporting period: January 2024 through June 2024

- No further updates at this time.

Final Report

The Fair Housing Center's housing conditions program was the most significant update regarding this issue over the last 5 years. This program has prevented countless evictions as it goes upstream before evictions are filed and prevents evictions from occurring in the first place.

Fair Housing Issue: Impediments in Rental Housing

Goal: Ensure access to reasonable accommodations and modifications to improve housing accessibility

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Educate tenants and housing providers about rights and responsibilities	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Ability Center	Conduct trainings, distribute educational materials, place advertisements	Ongoing, reported quarterly
Enforce Fair Housing Act violations		Ability Center	Assist victims, conduct investigations, file complaints	Ongoing, reported quarterly
Provide funding for accessibility modifications	Department of Neighborhoods	Ability Center	Advocacy for funding that supports housing needs	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

Update from TFHC:

- Number of RA/RMs granted for persons with disabilities: 3 cases (5 persons)
- 17 out of 26 new cases (65%) were based on disability discrimination
- TFHC regularly conducts fair housing trainings for community groups and housing professionals, distributes educational materials, places advertisements in various media outlets, posts information on its website and social media, distributes quarterly newsletters, and has staff representatives serving on various community committees, boards, and coalitions. These activities help to raise awareness about housing rights for persons with disabilities.

Update from The Ability Center:

- The Ability Center operates a Home Accessibility Program where it provides ramps at no-cost to homeowners with disabilities.
- The Ability Center fielded 215 calls from individuals with disabilities who had housing issues.
- 8/25/2020: Housing Equity Roundtable
- 9/2/2020: Ohio Housing Policy Panel
- 9/29/2020: Housing Equity Policy Group
- 10/15/2020: COT 10-year Housing Action Plan
- 12/16/2020: DD Council Housing Policy Panel
- Ramps built:
 - 24 - grants & waiver
 - 8 – temp ramp program
 - 1 – hospice

Reporting period: January – March 2021 & April – June 2021

Update from TFHC:

- Number of RA/RMs granted for persons with disabilities: 7 cases (11 persons)
- 37 out of 65 new cases (57%) were based on disability discrimination
- TFHC regularly conducts fair housing trainings for community groups and housing professionals, distributes educational materials, places advertisements in various media outlets, posts information on its website and social media, distributes quarterly newsletters, and has staff representatives serving on various community committees, boards, and coalitions. These activities help to raise awareness about housing rights for persons with disabilities.

Update from The Ability Center:

- 3/10/2021 Ohio Housing Policy Panel
- Tenant Protection Initiatives

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- 4/7/2021: housing review for accessibility
 - 4/2021: meeting with DON to discuss housing accessibility
 - 4/2021: COT 10-year housing plan
 - 5/2021: OSILC Housing Workgroup meeting
 - 5/2021: housing accessibility review
 - Ramps built:
 - 15 – grants & waiver
 - 9 – temp ramp program
 - 2 – hospice

Reporting period: July - September 2021 & October - December 2021

Update from TFHC:

- Number of RA/RMs granted for persons with disabilities: 24 cases (3,219 persons)
- 39 out of 57 new cases (68%) were based on disability discrimination
- TFHC regularly conducts fair housing trainings for community groups and housing professionals, distributes educational materials, places advertisements in various media outlets, posts information on its website and social media, distributes quarterly newsletters, and has staff representatives serving on various community committees, boards, and coalitions. These activities help to raise awareness about housing rights for persons with disabilities.
- TFHC conducted several trainings with a specific emphasis on reasonable accommodations and modifications to ensure accessibility for persons with disabilities. These sessions included a presentation to homeless service providers hosted by TLCHB and TAAEH, trainings for two local public housing authorities, a virtual training on Zoom/Facebook Live covering housing rights for people with disabilities, and a CLE training for attorneys conducted in collaboration with the Toledo Bar Association.

Update from The Ability Center:

- Ramps built:
 - 15 – grants and waiver
 - 6 – temp ramp program to help D/C safely
 - 2 – hospice installs

Reporting period: December 2021 through January 2023

- As with previous reporting periods and as demonstrated in the statistics provided above, disability continues to be the most common type of case that The Fair

Housing Center handles. This includes, primarily, reasonable accommodations cases.

- The Ability Center continues to provide its ramp program and its advocacy for persons with disabilities as described above.

Reporting period: January 2023 through June 2023

- No further updates at this time. The work described above is ongoing.

Reporting period: July 2023 through December 2023

- The work described above is ongoing.
- In addition, The Fair Housing Center has filed multiple reasonable accommodation cases in federal court.

Reporting period: January 2024 through June 2024

- The work described above is ongoing. No further updates at this time.

Final Report

This work was successful throughout the five year period of this Action Plan as described above.

Fair Housing Issue: Access to Water Services

Goal: Adopt policy and practice improvements through Water Affordability and Consumer Protection Committee

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review and revise consumer policies and programs as needed	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Participate in committee meetings and offer input	Ongoing, reported quarterly
Collect and analyze data related to water access and affordability	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Participate in committee meetings and offer input	Ongoing, reported quarterly
Educate consumers about assistance programs	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Connect clients to community resources	Ongoing, reported quarterly
Outreach to residents and neighborhood groups to seek input on water access and affordability	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Advocacy for policies that support housing needs	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

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- The Water Affordability and Consumer Protection Committee has been meeting monthly to discuss policies and legislation to improve water access and affordability for all residents. Representatives from City Council, DPU, TFHC, Ohio Environmental Council, Freshwater Future, Junction Coalition, UPSE, and neighborhood residents attend meetings. Data has been requested and provided by DPU to help members analyze water issues and identify who is being impacted. Committee members communicated the need for a water affordability study to better understand the scope of the community's needs and make appropriate recommendations for changes to the City's water policies. An RFP was developed and posted, and a contractor was selected to begin work. The committee also drafted an ordinance to establish a debt forgiveness program that would enable residents to eliminate past due balances and avoid water shutoffs. The ordinance is currently under review by the City's law dept.
 - City Council passed an ordinance in June 2020 to help protect tenants from water shut offs that occur when owners do not pay the water bill or request termination of water services. The new ordinance, drafted by TFHC, enables tenants to pay the water bill to avoid disconnection and gives them the right to deduct these costs from future rent payments. Further, it prohibits the Department of Public Utilities from terminating water service to occupied rental properties, which prevents owners from shutting off utilities as a form of "self-help eviction" to force tenants to leave. Water is essential for a home to be safe, healthy, and habitable, and this legislation will ensure tenants are not denied the right to this vital resource.

Reporting period: January – March 2021 & April – June 2021

- In May 2021, City Council approved the debt forgiveness program developed in partnership with the Water Affordability and Consumer Protection Committee. Residents that are low-income, elderly, or have disabilities may enroll beginning in August. By paying their current water bill monthly for a period of one to two years (depending on the amount of debt on the account), residents will receive credit that will eventually erase all past accumulated arrears. The goal of the program is to prevent water shutoffs by offering manageable monthly payments and forgiving debts that consumers do not have the ability to pay.
- TFHC drafted a water reselling ordinance that was introduced to City Council in July 2021. The legislation aims to clarify the City's current prohibition against reselling water, in order to prevent the abusive and confusing practices that often arise when landlords pass the cost of water onto tenants.

Reporting period: July - September 2021 & October - December 2021

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- Because Ohio law requires that water service be set up in the landlord's name, complications arise when tenants are asked to pay for water but do not have access to the account. In an effort to combat the confusing and abusive practices that often arise when water costs are passed onto tenants, TFHC educated the community and City Councilpersons on the need for revisions to Toledo's local rules on water reselling. Approved by City Council in August 2021, the legislation restricts landlords from charging tenants separately for water unless they meet specific conditions. For rental properties with more than one unit, owners may not charge tenants separately for water unless they obtain permission through a contract with the Department of Public Utilities and meet sub-metering requirements for each unit. For single-family rental properties, owners may not charge tenants separately for water unless they set up a landlord-tenant agreement with the Department of Public Utilities, giving the tenant direct access to the water account.
 - TFHC created and distributed an educational document outlining Toledo's local regulations related to water access for rental properties.
 - Ohio Environmental Council hosted its annual law conference in November 2021, featuring an extensive discussion about efforts Toledo has made to address environmental justice issues and provide better access to clean water. The conference included a presentation from TFHC's VP and General Counsel George Thomas on the disparate impact of water shut-offs on low-income neighborhoods and communities of color.

Reporting period: December 2021 through January 2023

- The overall efforts to improve affordability as described above. The City has implemented a number of programs to help address affordability in the area.
- One important aspect of affordability is that landlords sometimes resell water to tenants, by charging the extra for water that the landlord pays for through their account with the City. The City has appropriate rules to prohibit this practice. However, the City must ensure enforcement of these rules and accurate communication with residents about the rules. The City should better communicate the rules and dedicate resources to enforcement of the rules against reselling.

Reporting period: January 2023 through June 2023

- The City recently publicly committed to try to find ways to enforce its local prohibition on reselling of water so that tenants can benefit from this protection. TFHC is watching the situation closely, as this issue continues to be very important in the Toledo area.

Reporting period: July 2023 through December 2023

- The City decided not to enforce the local law on reselling water services which has been a significant setback for water affordability and consumer protections.
- The Fair Housing Center is continuing to monitor this issue. Although the City has chosen not to enforce the local law, the local law is still very helpful as it still provides individual tenants with rights to prevent water reselling.

Reporting period: January 2024 through June 2024

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- No further updates at this time. The FHAP currently being written will emphasize the need for enforcement of the laws as described above.

Final Report

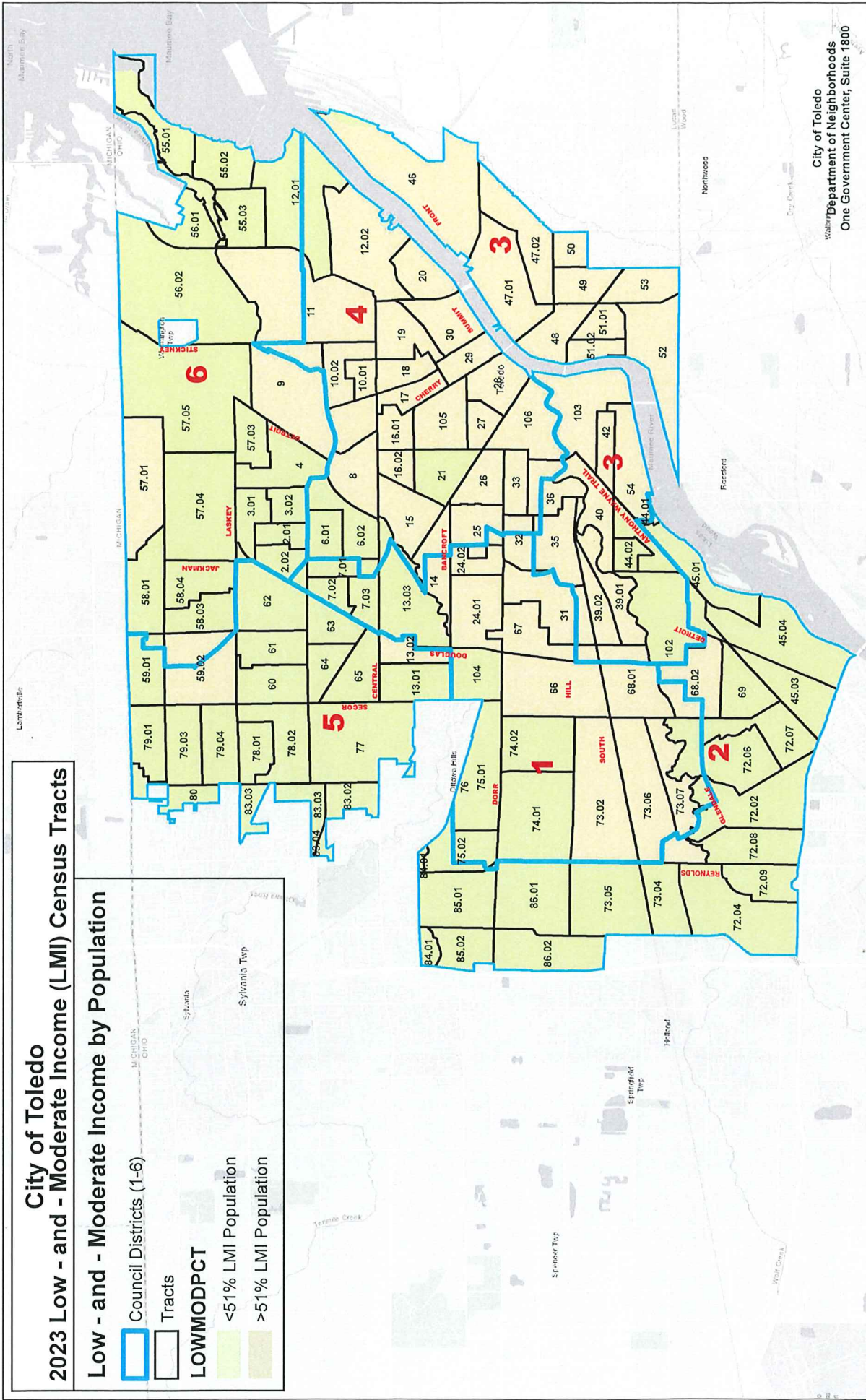
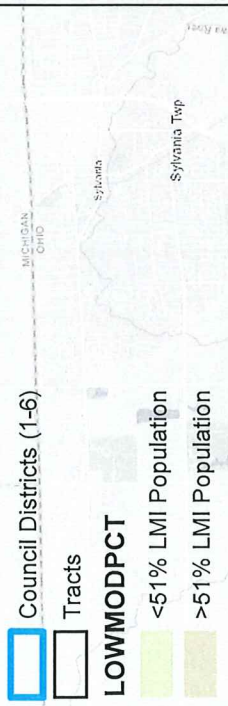
The City has begun shutting off water services for nonpayment after years of a hiatus on shut offs following the pandemic. The Center has advocated for policies that ensure landlords do not resell water in an abusive manner and that ensure tenants can access account information and take advantage of affordability programs and repayment programs where applicable. This important issue continues to be highlighted in the 2025-2030 AI.



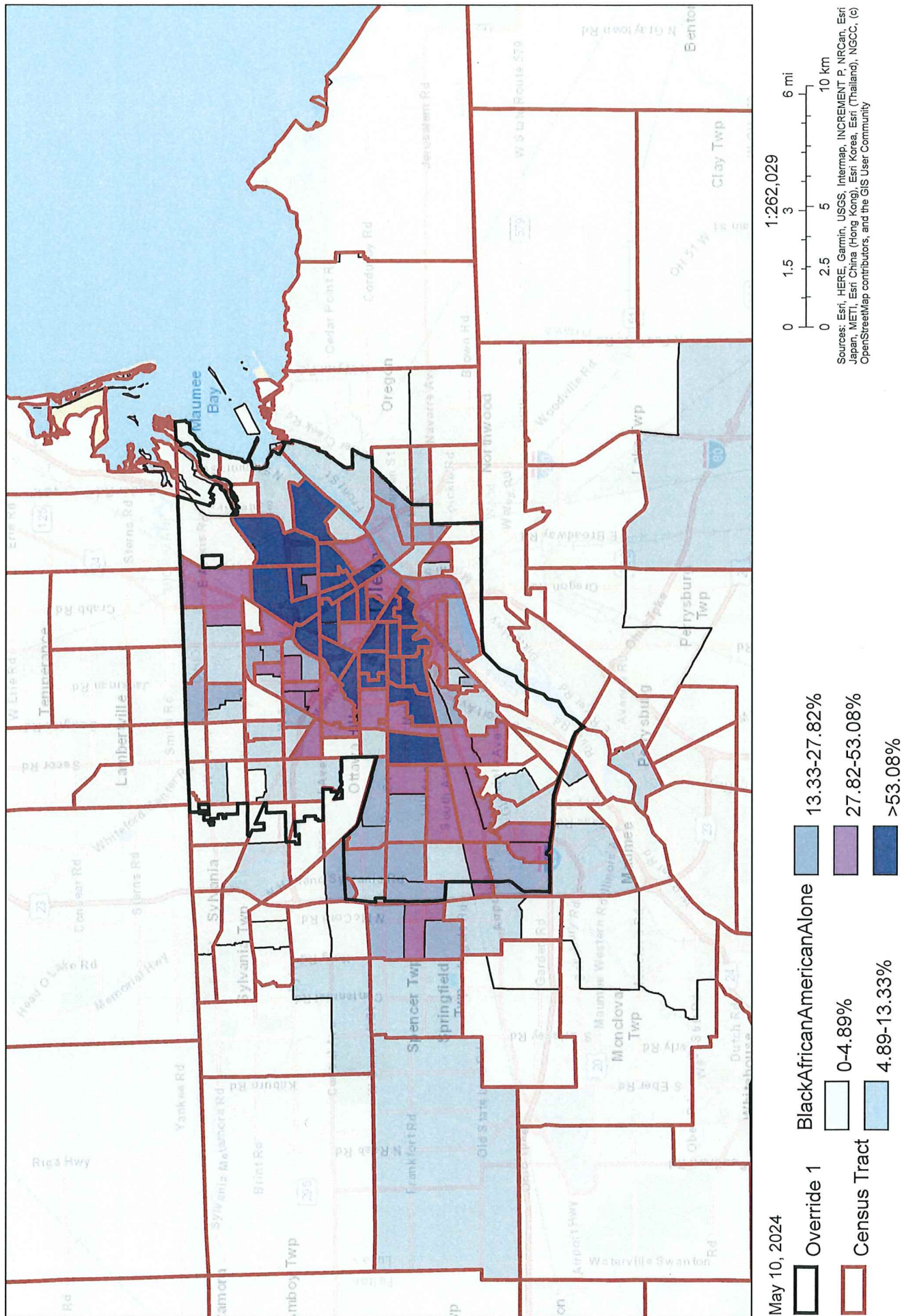
Maps

City of Toledo 2023 Low - and - Moderate Income (LMI) Census Tracts

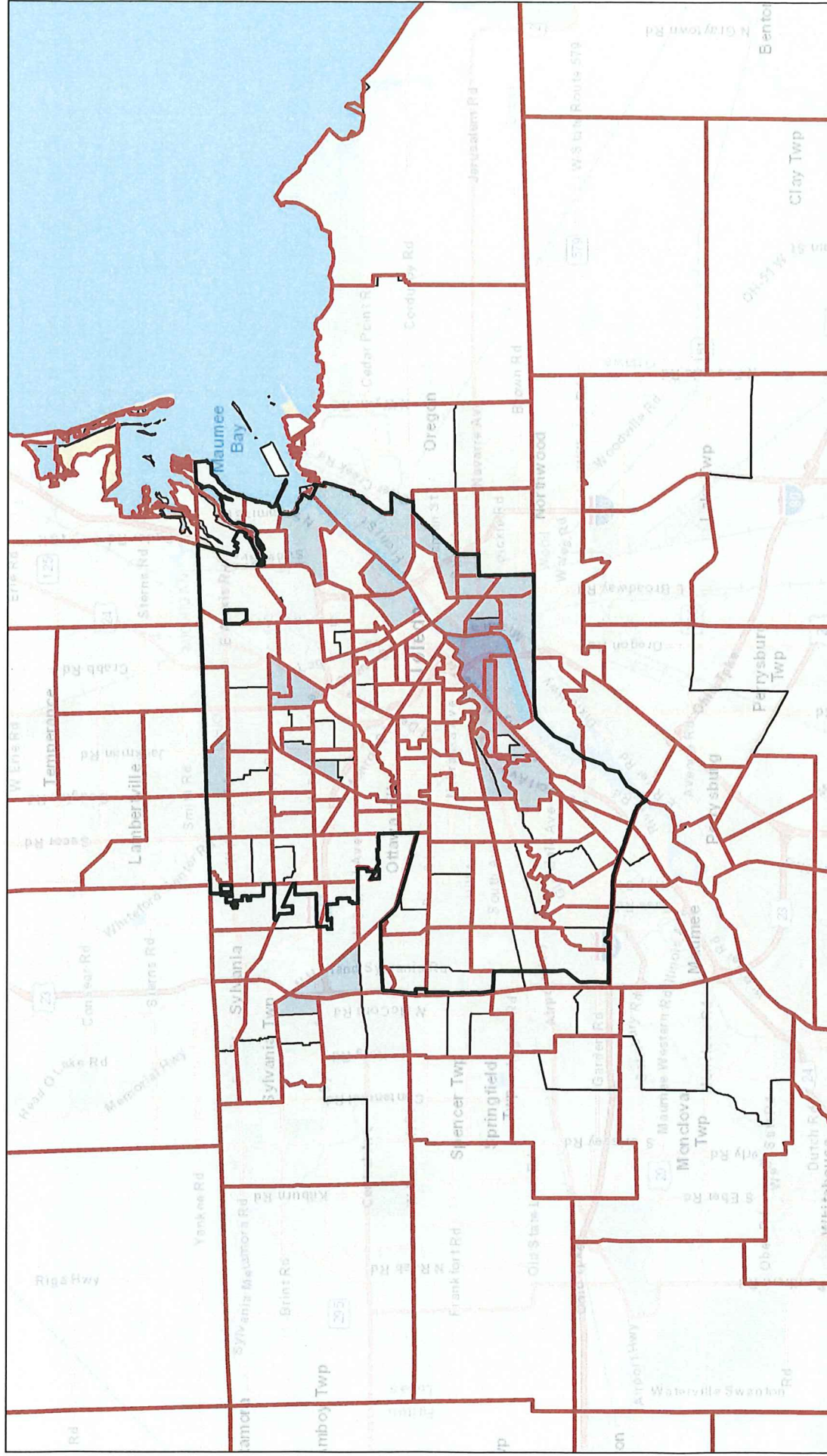
Low - and - Moderate Income by Population



Black or African American Population in Toledo - Concentration of Minorities per Census Tract



Hispanic Population in Toledo - Concentration of Minorities per Census Tract



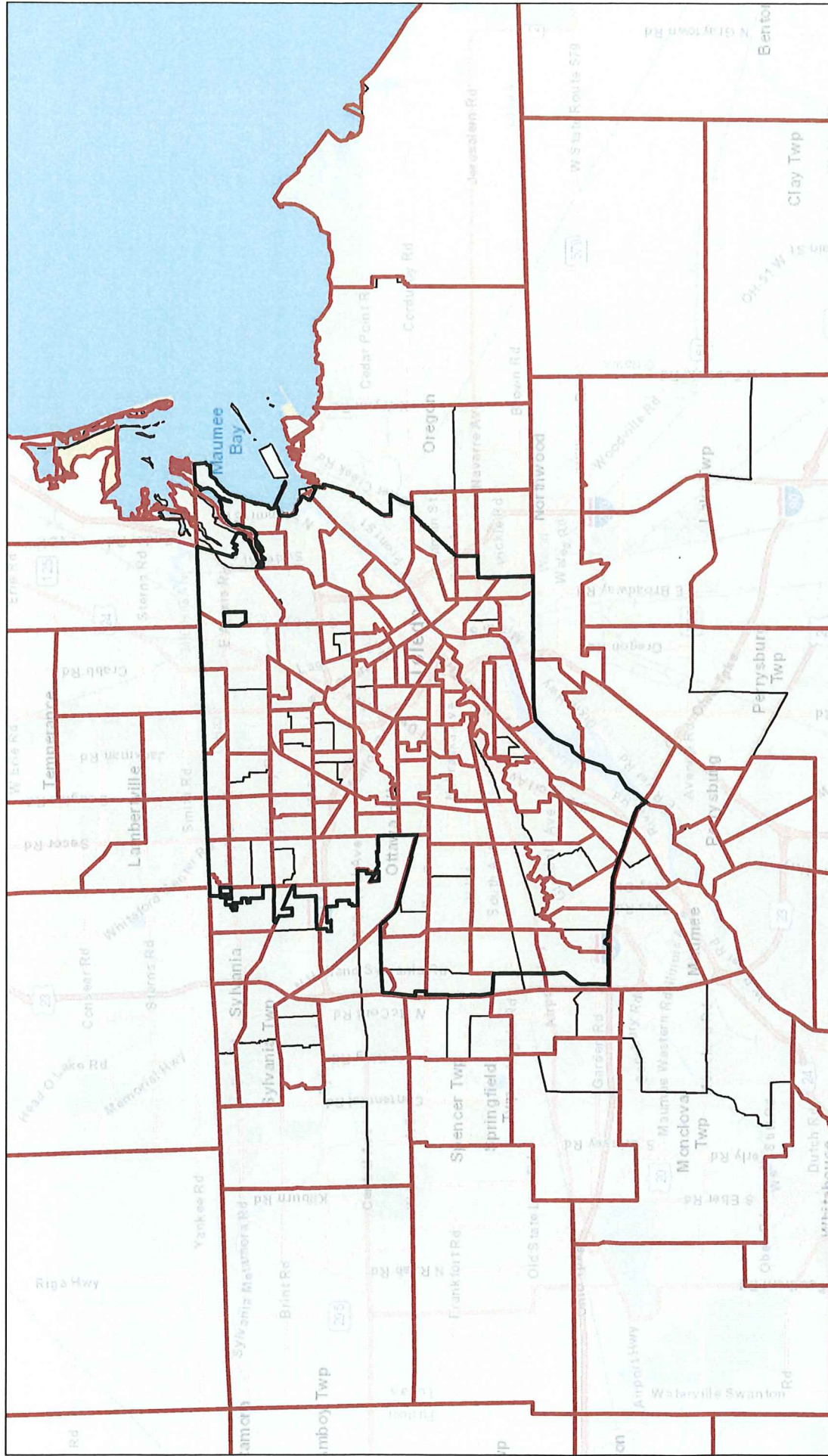
May 10, 2024

1:262,029



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Native Hawaiian/Pacific Islander Population in Toledo - Concentration of Minorities per Census Tract



May 10, 2024

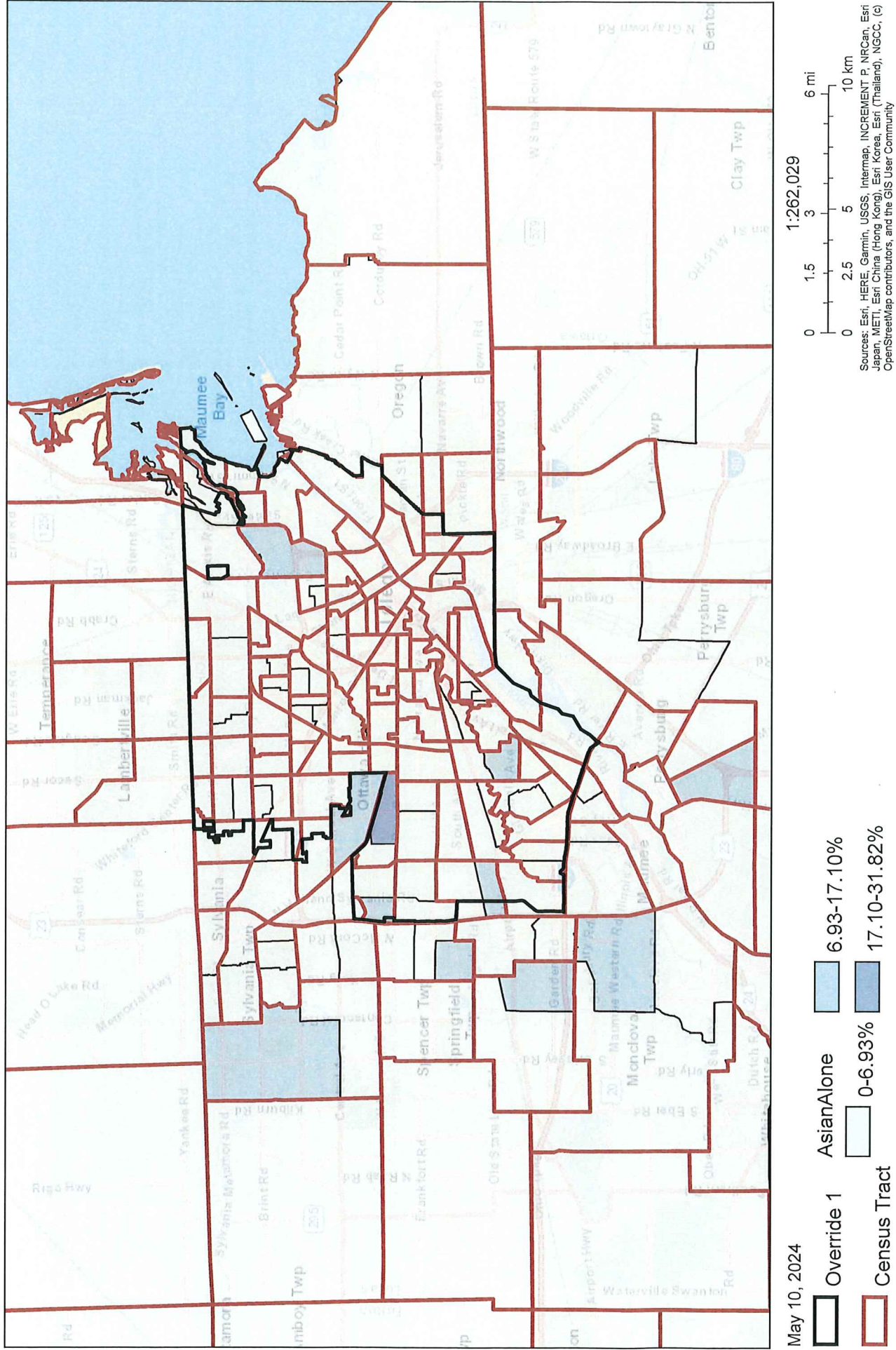
Override 1 NativeHawaiianPacificIslanderAlone

Census Tract 0-2.28%

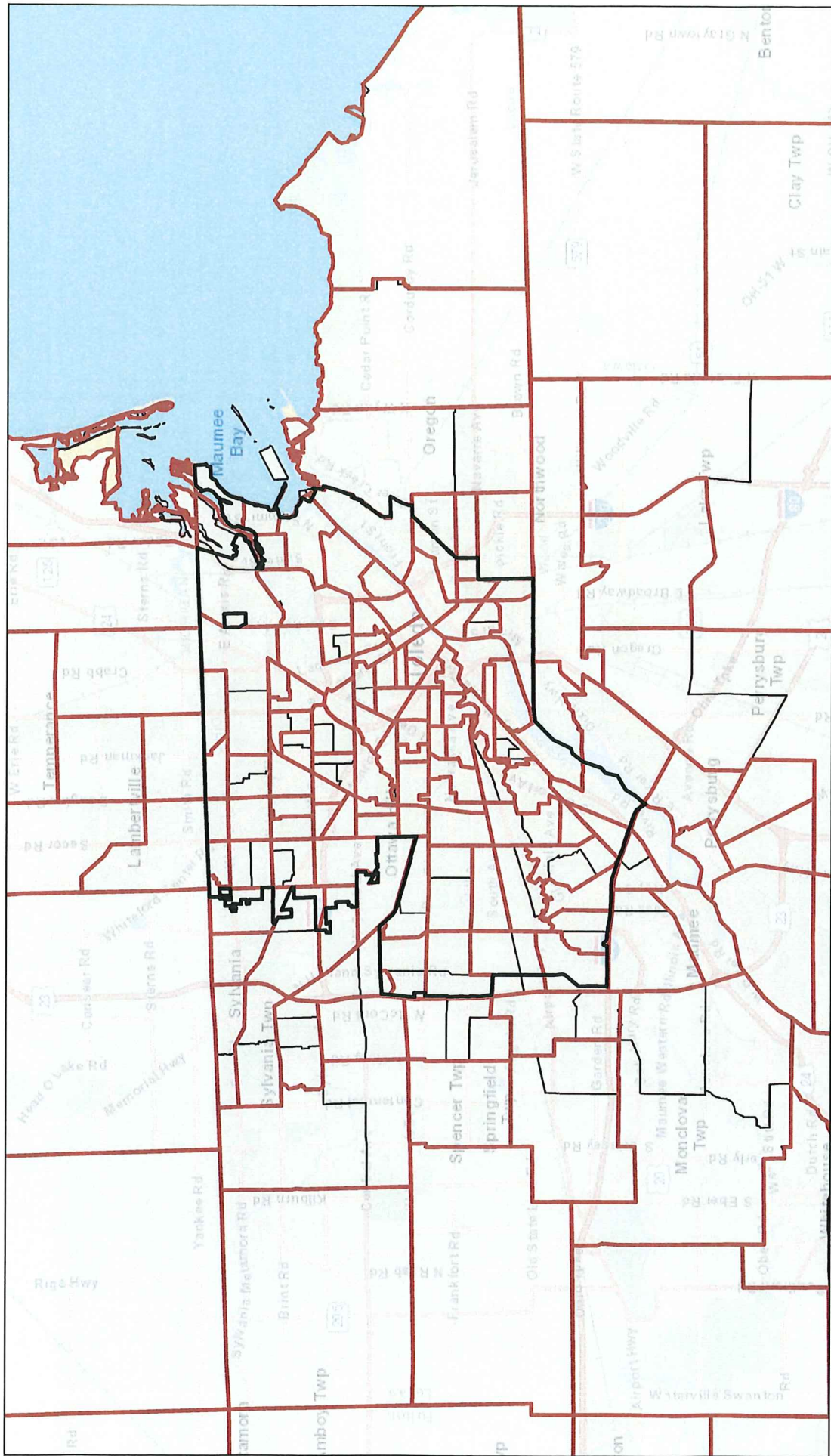
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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Asian Population in Toledo - Concentration of Minorities per Census Tract



American Indian/Alaska Native Population in Toledo - Concentration of Minorities per Census Tract



May 10, 2024

 Override 1

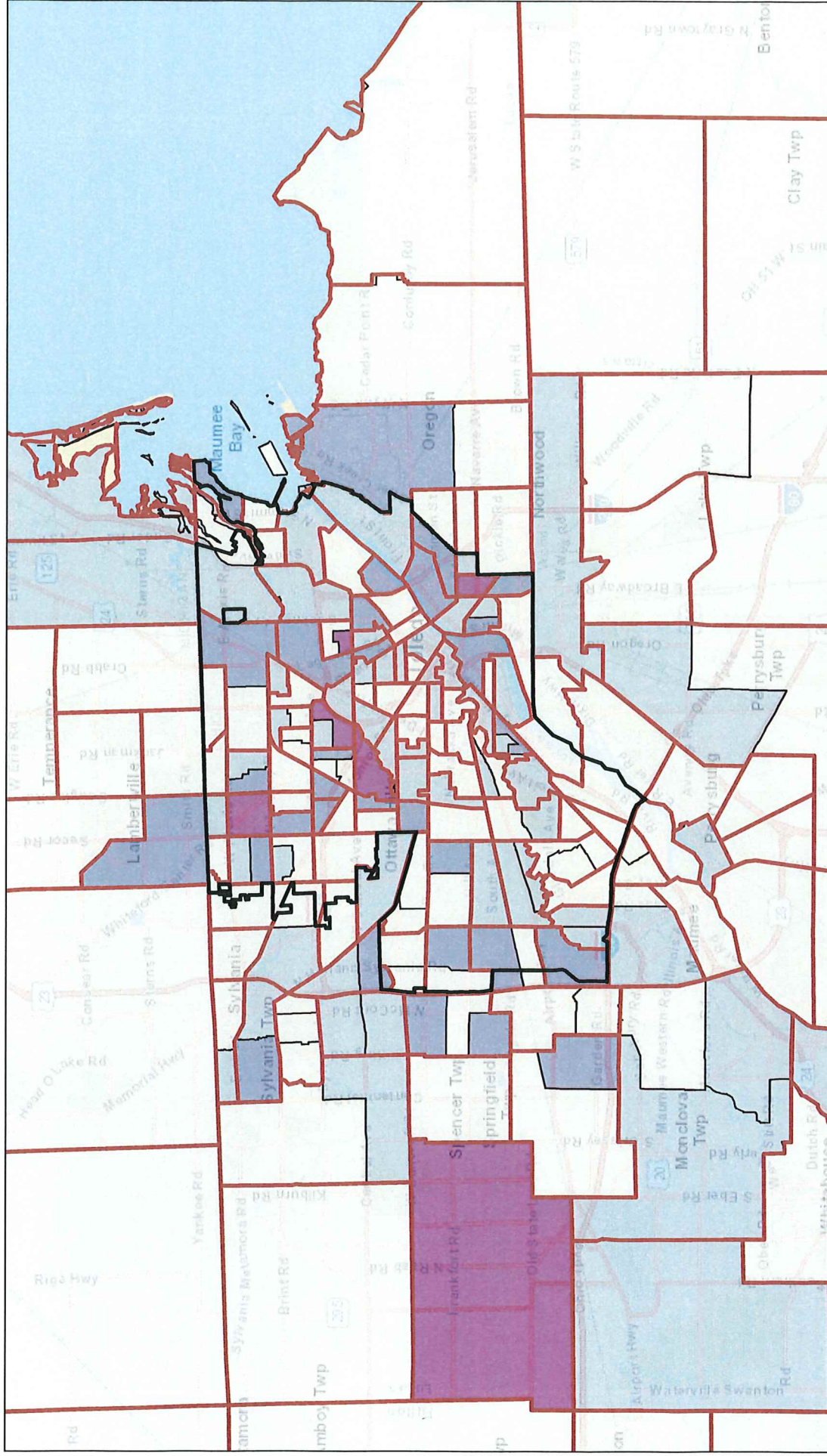
 American Indian/Alaska Native Alone

 0-2.48%

 Census Tract

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Two or Races Population in Toledo - Concentration of Minorities per Census Tract



May 10, 2024

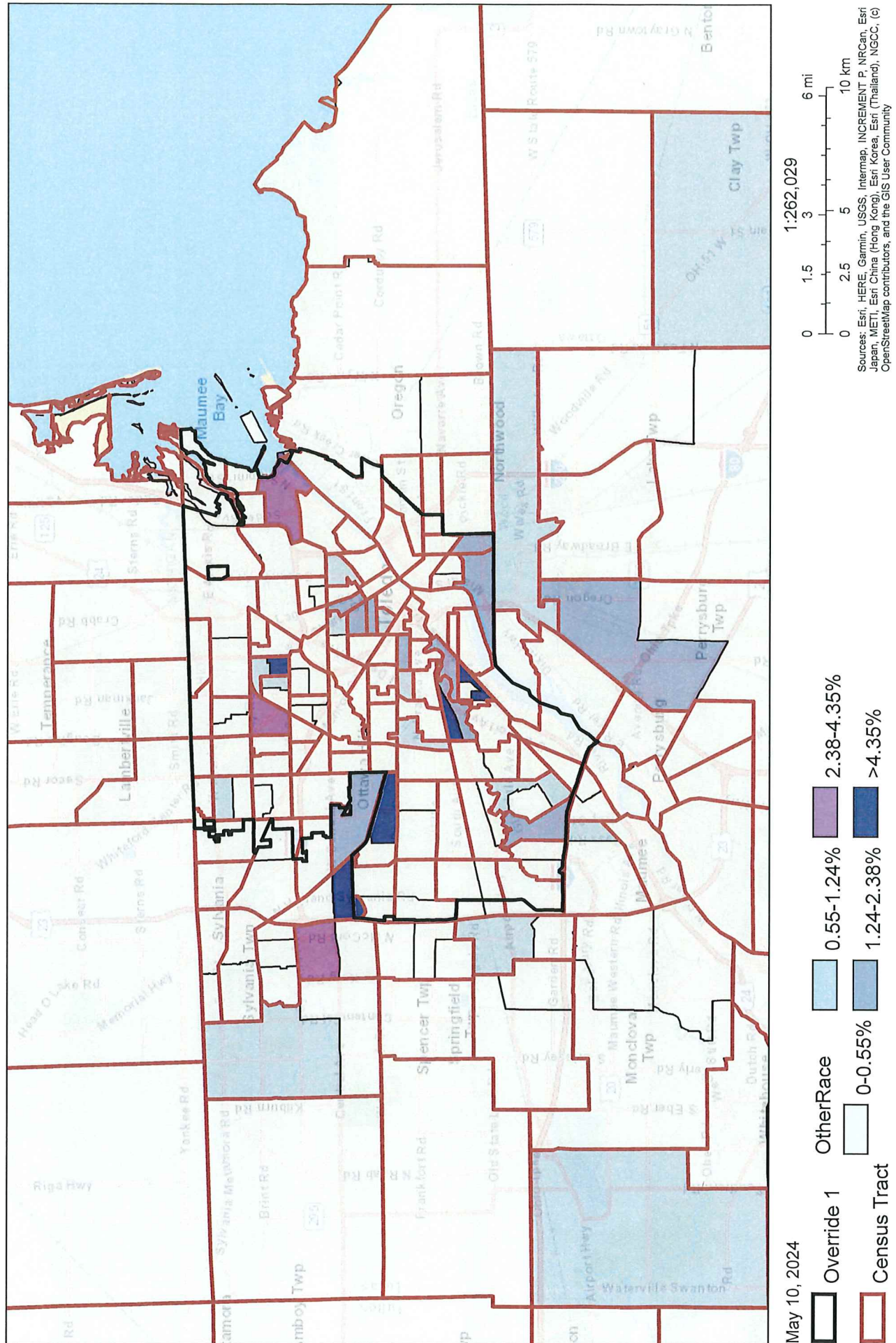
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0 1.5 3 6 mi

0 2.5 5 10 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Some Other Race Alone Population in Toledo - Concentration of Minorities per Census Tract





Homelessness Indicator Snapshots

2024-2025 CAPER Snapshot Matrix 7.1.24-6.30.25

Metric	Emergency Shelter		Rapid Rehousing		Transitional Housing	
	<i>Individuals</i>	<i>Households</i>	<i>Individuals</i>	<i>Households</i>	<i>Individuals</i>	<i>x</i>
# of Households/Individuals Served 4a.1	430	261	395	141	4	x
Exits to Permanent Housing 23c	x	163	x	104	0	x
Adults Employed at Exit 17	146	x	18	x	0	x
Exits with Non-Cash Benefits 20a	x	100	x	56	0	x
	<i>Stayers</i>	<i>Leavers</i>	<i>Stayers</i>	<i>Leavers</i>	<i>Stayers</i>	<i>Leavers</i>
Length of Stay 22b	138	95	375	309	385	320
Increased Income at Exit 19a1	x	9	x	4	x	0



**PR26 report to be
included in the final
version of this CAPER**



**ESG CAPER to be
included in the
final version of
this CAPER.**