

2023-2024 Action Plan

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The U. S. Department of Housing and Urban Development (HUD) annually distributes funds to the City of Toledo (COT), a designated entitlement City and participating jurisdiction, through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG). These federal funds, provided to the COT by HUD, promote low- to moderate-income communities by funding initiatives that provide employment opportunities for people with low- and moderate-incomes while also providing affordable, safe, and sanitary housing.

In addition, to CDBG, HOME and ESG grants, the Department of Housing and Community Development (DHCD) received Neighborhood Stabilization Program (NSP) stimulus grants (NSP1, NSP2 and NSP3). The initial NSP funds have been fully expended. NSP2 has been officially closed out with HUD. The program income from NSP1 and NSP3 will be utilized to complete a proposed project for the 2023 program year.

The COT completes Lead-Based Paint Hazard Control using a variety of funding sources. The HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) awarded the COT \$5.7 million to develop and manage a Lead-Based Paint Hazard Control and Healthy Homes program. The three-and-a-half-year grant began on 01/04/2021 and will initially end on 06/30/2024, though the DHCD is expected to request a no-cost extension of the period of performance to 06/30/2025. The program's goal is to provide financial assistance to property owners in order to help control lead paint hazards in owner-occupied and rental residential units where a pregnant woman or a child under the age of six resides.

The OLHCHH also provided \$1,000,000 in multi-year funding to pilot a collaboration demonstration between the City's Lead Hazard Reduction grant programs and the NeighborWorks Weatherization program. This grant program integrates lead hazard mitigation with weatherization and air quality restoration. The three-year program began on 07/21/2021 and will end on 07/28/2024.

The Toledo-Lucas Regional Health District also received up to \$1,140,000 in funding for Lead-Based Paint Hazard Control through a three-year contract utilizing BP-Husky settlement funds. The contract began on 05/01/2021, and was to conclude on 03/25/2023; however, a two-year extension with a period end of 03/25/2025 was granted.

The 2023 (49th) Program Year (PY), which begins on July 1, 2023, is the fourth year of the City of Toledo's 2020-2024 Five-Year Consolidated Plan. The 2023 (49th) PY Annual Action Plan, which describes a one-year strategic strategy, includes the intended use of the funding that would be received from HUD. If accepted, the designated money will assist Toledo's city government in making use of its significant resources. With the use of these resources, the goals listed in the 2020-2024 Five-Year Consolidated Plan will be accomplished. The goals were established through consultation with neighborhood associations, feedback from locals, and assessments of regional statistics.

The funding allocations from HUD to the COT shown below are for the 2023 (49th) PY. To match actual allocation amounts, all proposed activity budgets were proportionally increased or decreased from the estimated funding levels.

- Community Development Block Grant (CDBG): \$7,355,028
- HOME Investment Partnerships Program (HOME): \$2,551,780
- Emergency Solutions Grant (ESG): \$648,066

Other resources available in the community are as follows:

- Lead Hazard Control and Healthy Homes Grant: \$4,182,857
- NSP1 and NSP3: \$500,528
- HUD Healthy Homes & Weatherization: \$164,520
- Section 108 Loan Guarantee Authority: \$37,000,000
- American Rescue Plan Act (ARPA): \$14,000,000
- BP Husky Settlement: \$830,554
- U. S. Treasury Rental Assistance: \$28,990,204
- CARES Act (CDBG-CV): \$1,267,110
- CARES Act (ESG-CV): \$165,772

Program Income

Program Income (PI) is the gross income received by the grantee that was directly generated by the use of CDBG, HOME, and NSP funds.

The estimated program income is listed below:

- CDBG Program Income (estimated amount): \$223,679
- HOME Program Income: \$0.00
- NSP1 and NSP3 Program Income: \$0.00

CDBG, HOME, and ESG are annual federal allocations. PI from CDBG, HOME, and NSP are annual projections. The funds are available for use in meeting HUD's National Objective.

In accordance with HUD guidelines, the COT will devote at least 70% of its CDBG entitlement grant to initiatives that directly assist low- and moderate-income (LMI) residents, people with disabilities, and other City residents. The COT will also set aside 15% of its HOME fund allotment for approved and verified Community Housing Development Organizations (CHDOs).

The COT will allocate funds for both operational and programmatic goals as it pertains to the following:

- Planning and Administration (Operational, Program) CDBG, HOME, and ESG
- Housing and Neighborhood Revitalization (Operational, Program) CDBG, HOME, NSP, ARPA and Lead
- Economic Development (Operational, Program) CDBG
- Fair Housing (Operational, Support) CDBG
- Public Service (Operational, Program) CDBG and ESG
- Lead Hazard Control (Operational, Program) Lead
- HUD Healthy Homes & Weatherization (Operational, Program) Lead
- BP Husky Settlement (Operational, Program) Lead
- Public Facilities and Infrastructure (Operational, Program) CDBG
- Demolition and Blight Removal (Operational, Program) CDBG
- HUD Section 108 Loans (Operational, Program) CDBG

2. Summarize the objectives and outcomes identified in the Plan

Based on community feedback gathered during the citizen participation and engagement process, the 2020-2024 Five-Year Consolidated Plan's goals and priorities were established. With a focus on improving housing conditions, these objectives will target neighborhood, community, and economic development.

Working with non-profit organizations, for-profit companies, other City departments, and local and regional organizations working to improve the conditions of Toledo residents and neighborhoods will help achieve the high priority goals referred to as providing safe, adequate, and decent affordable housing. With the help of the DHCD's Third-Party Partners or non-profit partners, public service objectives addressing basic needs in the community will be carried out. The majority of those benefited by the initiatives will fall into the low- to moderate-income category as described in 24 CFR part 5.

The COT established local priorities consistent with HUD's National Objectives through the five-year consolidated plan, and the City will continue to actively pursue initiatives/activities that will address two of the three HUD national objectives:

- Benefit to low- and moderate-income (LMI) individuals
- Elimination of slum and blight in the community

Summarized information regarding the 2023 (49th) PY goals and objectives is included in section AP-20 Annual Goals and Objectives of the Annual Action Plan. Each goal addresses one of HUD's Objectives and Outcomes listed below:

Objectives:

- <u>Suitable Living Environment</u> create a healthy community by improving the well-being of low- to moderate-income residents through an array of services addressing basic needs and progress toward being self-sufficient.
- **Decent Housing** to ensure access to healthy, safe and affordable housing for low- to moderate-income households in the City and to advance fair housing to address discrimination.
- Economic Opportunity increase opportunities locally and create jobs.

Outcomes demonstrate how activities or programs will benefit a community or the people served. The three outcomes that will illustrate the benefits of each activity or program funded are:

Outcomes:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

All current and future activities supported by the five-year consolidated plan and one-year action plan will contribute to at least one objective and one outcome.

The COT will continue to use CDBG funds in low- to moderate-income target areas, with the goals of improving neighborhood conditions, economic development, and meeting the needs of low- and moderate-income Toledo residents identified in the 2020-2024 Five-Year Consolidated Plan.

In addition, the goals and actions in this Plan will Affirmatively Further Fair Housing by referencing the Fair Housing Center (TFHC) City of Toledo Analysis of Impediments to Fair Housing Choice July 1, 2020 - June 30, 2025.

3. Evaluation of past performance

The City is required to submit a Consolidated Annual Performance and Evaluation Report (CAPER) at the end of each program year as a recipient of CDBG and HOME program funds. The CAPER summarizes the accomplishments and progress toward the Consolidated Plan goals for each program year. As stated in the 2021-2022 CAPER, the City has met the majority of its priority objectives identified in the 2020-2024 Five-Year Consolidated Plan. The City outperformed expectations in many cases. With the CAPER submission in September 2023, accomplishments for the PY 2022-2023 will be available.

Based on the established priorities, the City continues to prioritize providing decent, safe, and affordable housing; eliminating homelessness; implementing the Fair Housing Action Plan (FHAP); and assisting with basic needs such as food and healthcare. The Department's involvement in housing projects has had a significant impact on the vitality and livability of neighborhoods in PY 2022.

In addition to the foregoing, the CAPER describes how CDBG funds continue to help meet the needs of LMI people through activities such as feeding programs, home rehabilitation, health services, park improvements, and so on. Additionally, CDBG funds were used to improve blighted conditions in low-income neighborhoods.

Down-payment assistance (DPA); rehabilitation of owner-occupied and rental housing units, with the majority of rehabs devoted to owner-occupied homes; and special projects such as multi-family and scattered site rehabilitation or new development projects led by developers and/or local partners were all recipients of HOME dollars.

The DHCD continues to collaborate with the Toledo Lucas County Homelessness Board (TLCHB) in its efforts to prevent and eliminate homelessness in Toledo. ESG funds helped Toledo make significant progress toward eliminating homelessness. The goal of having no more than 15% of adults who have transitioned to

permanent housing return to Rapid Re-housing, Transitional Housing, or Outreach within six months of leaving is still being met. Rapid Re-housing efforts remain a priority for the Continuum of Care (CoC). The results of ESG-funded programs for PY 2022 will be included in the 2022-2023 CAPER submission in September 2023.

In March 2022, the Division of Code Enforcement received the results of a full operations assessment on the approach to Code Enforcement's critical work within our neighborhoods from two nationally recognized and renowned agencies, the Center for Community Progress and May 8 Consulting Inc.

As previously stated in action plan updates, the Division is primarily focused on the development of mobile technology for field work to support data management and governance of the unit's output. The assessment provided key recommendations, with health and housing issues being of particular concern.

The following points were created pursuant to the review of the assessment to reflect the goals and expectations for the coming year 2023.

- Transition from the "Enforcement" approach to a more user-friendly approach of "Compliance", externally to include a culture change internally.
- Acquisition of new mobile technology for field personnel, iPads and mounting systems for Code Compliance vehicles.
- Acquisition of new software to integration to be shared with multiple entities, city, state and county agencies.
- Additional Code Compliance inspectors to aid in a more robust proactive approach to compliance
- Lead Safe Enforcement Specialist to enforce new legislation.
- Streamline current processes and procedures.
- Future neighborhood projects, the Code Compliance Englewood Pilot Program.
- Implementation of a decision-making process in determining outcomes for violators of the code, alternate compliance tracks.

The Division will continue to strive for a proactive approach by prioritizing responses based on need, improving data collection, management, analysis and ensuring compliance safeguards.

At the halfway point of the HOME 31st PY (2022), the Division of Housing deployed **\$456,707.00** of HOME funds under the HOME at Last down payment assistance program, assisting **61** LMI households in the COT.

The COT continues to use Neighborly to manage the Emergency Mortgage and Emergency Rental Assistance programs. To date, the Emergency Mortgage Assistance program (EMAP), funded by CDBG-CV2, has disbursed a grand total of \$425,731.53 in assistance to 62 LMI homeowners impacted by COVID-19, averaging \$6,866.63 per household.

The Lead Grant Program provided **\$426,692.00** in grant funds to **25** households in order to mitigate the hazards of lead-based paint.

Through its direct program administration and its HOME-funded sub-recipient, Maumee Valley Habitat for Humanity, **29** LMI were assisted with owner-occupied rehabilitation at an average cost of **\$76,500.00**.

A Notice of Funding Availability (NOFA) for Affordable Rental Housing Development was not issued during the HOME 31st PY because the projects that had received a conditional commitment in the previous PY were not successful in securing a tax credit award. The City has issued updated conditional commitment letters to developers who are resubmitting a tax credit application on or before June 30, 2023.

On January 13, 2023, a NOFA for homebuyer development was released. Four applications were received from current sub-recipients. Underwriting and evaluation was completed on the four applications. Conditional commitment letters were issued on March 17, 2023 to two subrecipients.

The HOME-ARP Allocation Plan was submitted and approved by HUD on February 15, 2023. The COT will proceed with deploying HOME-ARP funding in accordance with the plan. This includes funding for the development of affordable housing, supportive services, administration and planning.

The Toledo Neighborhood Capacity Building Institute (TNCBI) is a yearlong engagement of select non-profit organizations, neighborhood associations, and community leaders designed to build capacity in strategic areas required for effective neighborhood revitalization and sustainability. The City of Toledo hired The Barthwell Group to create and deliver the curriculum as well as provide evaluation consulting services. The TNCBI began on October 19, 2021, with cohorts of community leaders and designees from local organizations. The Community Leader Cohort had 12 sessions, while the Organization Cohort had 15. Board governance, mission and vision statement alignment, fundraising, grant writing, financial reporting, succession planning, collaboration, discovering tools and resources, and land use and zoning, housing development are among the TNCBI sessions. On Tuesday, November 1, 2022, members of the Toledo Neighborhood Capacity Building Institute's first cohort graduated. The Mayor and City Council Members recognized the 17 participants who received a certificate of completion.

The DHCD continues to use an online application process through ZoomGrants for CDBG, ESG, and HOME grant funding. Additionally, all CDBG and ESG sub-recipients electronically enter accomplishment data and submit requests for funds reimbursement through this system.

4. Summary of Citizen Participation Process and consultation process

The City of Toledo's Citizen Participation Plan (CPP) outlines the City's comprehensive approach to citizen participation and the consultation process. Public participation is essential in the planning process because it allows citizens' perspectives to be highlighted and ensures that careful consideration is given to community needs in the decision-making process.

The COT worked with non-profit organizations, Lucas Metropolitan Housing (LMH), the Fair Housing Center (TFHC), the Lucas County Homelessness Board (TLCHB), and other regional and local organizations involved in housing, community, and economic development to create the 2023 (49th) PY Annual Action Plan. Residents were given adequate and reasonable access to meetings, information, and records pertaining to the COT's proposed use of funds. Residents' feedback on the DRAFT Annual Action Plan was solicited during a 30-day comment period that began on **Wednesday**, **March 22**, 2023.

The COT held two virtual public hearings via Zoom on **Thursday**, **March 23**, 2023 and **Thursday**, **March 30**, 2023. To accommodate those who work during normal business hours, both public hearings were held at 5:30 p.m. at the end of the workday. A public notice, press release, and website and Facebook postings were used to promote the public hearings and 30-day comment period. The public notice announcing the availability of the DRAFT Annual Action Plan and the 30-day comment period was published in the Blade (local circulation), the Sojourner's Truth and La Prensa (minority papers) and was sent to the COT's community partners and posted on the website of the Department of Housing and Community Development.

To review and evaluate proposed funding requests, two Citizen Review Committees (CRCs) were formed. One committee reviewed non-homeless service applications (which included local 501 (c)(3) Non-Profit Agencies, Government Agencies (Government Entities/Quasi-Governmental Agencies (not-for-profit)), and Other Non-Profits). The second committee reviewed applications for homeless services. Members of the CRCs came from a variety of community sectors, including banking, religious organizations, healthcare, the public library, the financial sector, economic development, and social service organizations.

Furthermore, the DHCD consults with community leaders and residents on a regular basis in an effort to collaborate, improve neighborhood conditions, and provide basic services to residents. Table 2 of the AP-10 Consultation section lists the agencies or organizations that the DHCD directly consulted with.

All public hearings are held in buildings that are accessible to disabled individuals, wheelchair accessible, and include handicapped parking. Disabled persons are allowed to request services if there is a virtual public hearing.

5. Summary of public comments

A total of **13** residents attended the two virtual public hearings (**8** on March 23rd and **5** on March 30th, 2023). The DRAFT Annual Action Plan was presented by representatives from the Department of Housing and Community Development, Lucas Metropolitan Housing, Toledo Lucas County Homelessness Board, and the Fair Housing Center.

There were no public comments received at the public hearings. Furthermore, no additional comments were received within the 30-day comment period. The attachments offer a summary of the public hearings.

6. Summary of comments or views not accepted and the reasons for not accepting them

The DRAFT Annual Action Plan received no public comments. The City of Toledo does accept all public comments that are received.

7. Summary

The COT continues to focus its efforts on housing, neighborhood, and economic development while ensuring that residents, particularly low- to moderate-income residents, have access to basic needs services. CDBG, HOME, and the remaining NSP funds are used to support and leverage programs that provide affordable housing that is safe, adequate, and decent. ESG funds will continue to have a positive impact on Toledo's homelessness reduction. The City of Toledo's Lead Hazard Control and Healthy Homes (LHCHH) program assists property owners in controlling lead paint hazards in both owner-occupied and rental residential units.

The COVID-19 pandemic has had a significant impact on the COT and its residents in a variety of ways. The CARES Act's additional funding was critical in meeting new and challenging community needs, while annual CDBG funds have ensured continued access to services.

With the implementation of the 2020 Lead Safe Ordinance and the associated Lead-Safe program, the COT will do the following:

- HUD CDBG Early Bird Match Grant This program began in 2021 and will continue through the 2023
 PY. This grant will be used to encourage owners to comply with the new local lead ordinance by
 providing a 50% match on compliance costs, up to \$5,000 per rental unit, for units rented to low- to
 moderate-income tenants.
- HUD Healthy Home & Weatherization This pilot program will connect the DHCD's Lead Hazard
 Control and Healthy Homes (LHCHH) grant with NeighborWorks Toledo Region's Weatherization
 Assistance Program (WAP). This three-year grant program is currently being implemented. By July 28,
 2024, a minimum of 40 units must be completed.
- **BP Husky Settlement** In collaboration with the Toledo Lucas County Health District, this grant will be used in conjunction with the Lead Hazard Control and Health Homes grant to assist property owners in the control of lead paint hazards. A minimum of 40 units must be completed by March 25, 2025.

For the 2023 (49th) PY, the COT is focusing resources on the following key initiatives and projects:

- Toledo Neighborhood Capacity Building Institute (TNCBI) Year 2 of a yearlong engagement of select non-profit organizations, neighborhood associations, and community leaders to build capacity in strategic areas required for effective neighborhood revitalization and sustainability.
- **COT Rooftop Program** In collaboration the DHCD, community partners, and financial institutions, will provide roof repair or replacement in the COT. This project will receive approximately \$2.6 million in U. S. Treasury funds in addition to the \$475,000 in CDBG funds.
- HUD Section 108 HUD approved the COT's creation of a \$37 million loan pool to provide long-term,
 fixed-rate, and reasonably priced financing that is not otherwise available. Funds will be used to bridge
 financing gaps and enable borrowers to proceed with their respective transactions; create and retain
 job; increase affordable housing; advance equity and equitable development opportunities and
 expand on the existing tax base.
- Neighborhood Revitalization Strategy Areas (NRSAs) The City of Toledo received HUD approval for two NRSAs. The city is committed to leveraging resources and funds in order to create viable neighborhoods.
- Wayman Palmer YMCA A new 50,000-square-foot community center in central Toledo is set to open in 2024, with multipurpose rooms for youth gaming, a demonstration kitchen, meeting rooms, gymnasiums, fitness rooms, and an indoor pool.
- Swayne Field Revitalization The city received Community Project Funding (CPF) in the amount of \$4,000,000, which will support the revitalization of the Englewood-Junction neighborhoods in the City of Toledo. The CPF project is to address high unemployment and poverty of residents in the target neighborhoods, through workforce training and development. This will be accomplished by establishing the Toledo Healthy Homes Training Center (THHTC) in the approximate 17,000 square feet of space at the Swayne Field Shopping Center, a distressed commercial space with 50% vacancy.

The COT is committed to providing every opportunity for residents and stakeholders in its jurisdiction to participate in the Consolidated Plan process, including the Annual Action Plan. The COT strives to meet the goals outlined in the 2020-2024 Five-Year Consolidated Plan by collaborating with non-profit organizations and numerous other agencies.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and also those responsible for the administration of each grant program and funding source.

Agency Role	Name	Department/Agency					
CDBG Administrator	TOLEDO	Department of Housing and Community Development					
HOME Administrator	TOLEDO	Department of Housing and Community Developmen					
ESG Administrator	TOLEDO	Department of Housing and Community Development					

Table 1 - Responsible Agencies

Narrative (optional)

The City of Toledo Department of Housing and Community Development is the lead agency responsible for preparing and administering the Consolidated Plan and Annual Action Plan, as well as the use of federal funds from the U. S. Department of Housing and Urban Development (HUD) for the implementation of the goals identified in these plans.

The goals outlined in the 2020-2024 Five-Year Consolidated Plan and the 2023 (49th) PY Action Plan are carried out in collaboration with non-profits, public housing agencies, businesses, and other local and regional organizations working to improve the lives of Toledo residents.

Consolidated Plan Public Contact Information

Department of Housing and Community Development 2020-2024 Five-Year Consolidated Plan One Government Center, Suite 1800 Toledo, OH 43604 (419) 245-1400

AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The COT is dedicated to meeting the community's needs in the most efficient and effective manner possible. Citizen participation and consultation are critical components of the Annual Action Plan's implementation.

The City worked with non-profit organizations, Lucas Metropolitan Housing (LMH), Toledo Lucas County Homelessness Board (TLCHB), the Fair Housing Center (TFHC), Lucas County Land Reutilization Corporation (Land Bank), and other regional and local organizations involved in housing, community, and economic development to create the Annual Action Plan. The Citizen Participation Plan (CPP) process, which includes public hearings, a 30-day comment period, and direct consultations, is used to solicit input.

The COT utilized a Citizen Review Committee (CRC), which is comprised of residents from various community sectors who have broad or particular knowledge of existing community activities, understand community challenges, and can allocate resources when asked.

Furthermore, DHCD administration meets on a regular basis with community leaders in an effort to work on improving neighborhood conditions and delivering basic services to residents.

The City of Toledo examined the approaches being utilized to close what is known as the "Digital Divide," or the lack of broadband connectivity for low-income households. From the dataset of 2014 through 2017 to the dataset of 2017 through 2021, there has been a modest overall increase. The analysis, which covered the years 2017 through 2021, revealed that overall growth in broadband connectivity was less than 5%. By 2022, 90.5 percent of Toledo households had access to a computer, while roughly 83.4 percent had access to broadband internet.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The COT continues to advocate for improved collaboration and coordination in housing, health, homelessness, and related service efforts, and it actively collaborates with local public and private organizations to carry out activities aimed at improving the quality of life for Toledo residents. The City consults with these organizations on a regular basis as it develops plans and opportunities to improve cooperation and collaboration in the delivery of services to residents. Every year, efforts are made by major local entities to improve coordination between service and housing agencies, as well as private and public sector agencies, in order to reduce service gaps.

Lucas County Emergency Management Agency (LCEMA) prepared the Lucas County Mitigation Plan of 2019, which is an update of the Countywide All-Natural Hazard Mitigation plan of 2013. The plan's purpose as stated was "to identify risks and vulnerabilities from hazards that affect Lucas County, Ohio to prevent or reduce the loss of life and injury and to limit future damage costs by developing methods to mitigate or eliminate damage from various hazards." The City partnered with LCEMA and other jurisdictions to further identify, define, and characterize the hazards affecting the City and prioritize projects that reduce hazard vulnerability of households

especially those with low incomes. Technological/human caused hazards such as civil disturbance and terrorism and natural hazards including severe winter storms and temperature extremes due to climate change were added.

The Plan's Section 2.2.2 defines vulnerability as "measure of the propensity of an object, area, individual, group, community, country, or other entity to incur the consequences of a hazard" (Coppola, 2015, p. 33). Vulnerability can be impacted by income disparity, class, race or ethnicity, and disability to name a few factors. Hazards associated with climate change have been shown to have a disparate impact on LMI households due to poor housing conditions that many of these households live in whether renters or homeowners. These housing structures tend to suffer disproportionately during disasters. The Plan also addressed challenges faced by persons with disabilities accessing transportation to evacuate and shelters and post disaster housing. The Housing Market Analysis section of this Plan identifies the need for home repair especially among the elderly and inadequate shelters and permanent housing for the at-risk of homeless especially during disasters.

According to Ohio Emergency Management Agency, in Lucas County, there have been 78 repetitive loss (damage on two occasions) properties and eight severe repetitive loss (damage on four or more occasions) properties. The City has the most repetitive loss and severe repetitive loss properties in total. Another area of vulnerability for housing owned by LMI households is the cost of property insurance for persons on fixed income especially flood insurance. In some areas with many LMI households, the cost and availability of insurance is inadequate.

Other organizations that advocate on behalf of those in need include the business community, faith-based organizations, public service entities, housing providers, foundations, and other community organizations. More formalized relationships that nurture and promote the City of Toledo's plans and goals will result from increased communication with all community stakeholders.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

TLCHB promotes an inclusive and comprehensive planning continuum, including the establishment of a CoC governance structure with representation from all CoC partners formally operating as members of the CoC. Membership requirements include, but are not limited to, being a recipient or subrecipient of CoC and/or ESG program funds, participating in Coordinated Entry (CE), and participating in the Homelessness Management Information System (HMIS). The CoC will be responsible for providing expertise and recommendations to the TLCHB Board of Directors and Executive Director on matters pertaining to CoC responsibilities, policies, and procedures. TLCHB facilitated a process to develop a strategic plan for the CoC to adopt, identifying updated priorities, goals, and action steps toward achieving those goals, and holding visioning sessions with CoC stakeholders to draft and approve a new governance charter, define the CoC, establish a new CoC Board, and strengthen governing processes from 2021 to 2023.

TLCHB oversees the CoC's local CE, which includes a universally accessible main access point in collaboration with United Way 2-1-1. Residents of Lucas County can call 2-1-1 to report being homeless or at risk of becoming homeless. The CE provides referrals to emergency shelters as well as prevention/diversion efforts to keep at-risk households from becoming homeless by redirecting them to community resources. Residents who present as

homeless or at-risk are quickly assessed and prioritized for referral to programs via prevention/diversion or the Community by Name List.

Project Home is leveraging funds from the State of Ohio's Housing Crisis Response Program and the United Way of Greater Toledo (RRH). TLCHB is the project manager for Project Home, which includes participation from Leading Families Home, United Way of Greater Toledo, Catholic Charities, and Lutheran Social Services. Project Home provides the financial and support service resources needed for people to obtain and maintain permanent housing, with a focus on households at risk of experiencing homelessness, people leaving shelter and transitional housing, people released from public institutions without permanent housing, and adequate community response in the areas of housing, education, and employment.

TLCHB administered **123** HUD Emergency Housing Vouchers in collaboration with Lucas Metropolitan Housing (LMH) (current utilization rate: 85%). TLCHB manages the No Barriers Housing Initiative, a local Housing First initiative that provides designated Housing Choice Vouchers to chronically homeless individuals (current utilization rate: 86%). Over **60** chronically homeless people were successfully housed in the previous year. LMH has offered to provide additional vouchers in the future.

TLCHB and LMH work together on the Park Apartment project to integrate Transition Aged Youth (TAY) services into the CE. In 2024, this project will provide 45 units of permanent supportive housing to TAY (18-24 years old) with a disability, serving Lucas County's most vulnerable youth experiencing homelessness. To begin service planning, a task force was formed. Positive exits will be eligible for tenant-based vouchers. Safety Net, a 24-hour shelter for at-risk or fleeing youth, is housed at the CoC. TLCHB manages a Family By-Name list for rapid and permanent supportive housing for homeless families with children. TLCHB is bringing together community stakeholders to plan the Youth Homelessness Demonstration Program (YHDP). The goal of the YHDP is to assist selected communities in the development and implementation of a coordinated community approach to preventing and ending youth homelessness on a local and national level. TLCHB is coordinating the formation of a Youth Action Board through the Race Equity and Access Core Committee, which will sit on the CoC and be crucial in providing guidance and live expertise to TLCHB and the CoC.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The COT collaborates with TLCHB, the lead agency in the Continuum of Care (CoC), on all issues pertaining to the elimination of homelessness in Toledo. The City of Toledo Department of Housing and Community Development develops and implements the local process for allocating ESG funds in collaboration with the TLCHB. The DHCD distributes ESG funds in accordance with the provisions of the Homeless Emergency Assistance and Rapid Transitions to Housing (HEARTH) Act of 2009.

The CoC's written standards establish policies and procedures for individual CoC members to follow in the implementation of the ESG program. TLCHB assists in the design of the RFP, the creation of score cards, and the determination of ESG funding priorities. TLCHB works with DHCD staff to ensure that all applications are complete. ESG funds are allocated through the formation of a Citizens Review Committee (CRC), whose

members evaluate applications submitted by area homeless providers and make funding recommendations to the department. TLCHB joins DHCD for the Citizen Review Committee scoring session. TLCHB also prepares annual monitoring reports for the ESG homeless service providers, which are reviewed by the CRC.

The public hearings held as part of the Consolidated and Annual Action Plan development process include an explanation of the use of ESG funds to allow the community to provide input on proposed ESG allocations. Members of the CoC are usually present at public hearings and are aware of the 30-day comment period on the published DRAFT Annual Action Plan. Furthermore, if any issues or concerns arise during the allocation process, CoC members communicate directly with the DHCD.

The CoC Quality and Performance Committee recommended performance standards and evaluation outcomes for providing ESG and CoC assistance, including the OH-501 Toledo/Lucas County CoC Written Standards, Coordinated Entry Written Standards, performance indicators, and the Project Home Re-housing Policy. The TLCHB has approved these written standards, which are included in the attachments.

TLCHB also administers the Homeless Management Information System (HMIS) funds in accordance with the HEARTH Act, and all data entered in HMIS is evaluated on a regular basis to assess progress toward the elimination of homelessness. TLCHB maintains open two-way communication with CoC members regarding system use and compliance with the HMIS reporting standards. TLCHB provides technical assistance to those who report to HMIS as needed. TLCHB also provides data and narratives for the Point in Time and Housing Inventory Count for our jurisdiction's Consolidated Plan.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	Lucas Metropolitan Housing (LMH)					
	Agency/Group/Organization Type	Housing					
		PHA					
	What section of the Plan was addressed by Consultation?	Housing Need Assessment					
		Public Housing Needs					
	Briefly describe how the Agency/Group/Organization was	Lucas Metropolitan Housing (LMH) was consulted to help determine housing needs, how					
	consulted. What are the anticipated outcomes of the	LMH serves those in need of public housing (including people with disabilities), and future					
	consultation or areas for improved coordination?	plans to meet public housing needs. The DHCD maintains regular communication with LMH					
		leaders about public housing and its residents. Consultations with LMH will continue in					
		efforts to provide low-income individuals and families with safe, adequate, and decent					
		affordable housing, including the rehabilitation and resale of Low-Income Housing Tax					
		Credit projects that have completed their 15-year compliance period.					
2	Agency/Group/Organization	Toledo Lucas County Homelessness Board (TLCHB)					
	Agency/Group/Organization Type	Continuum of Care Lead Agency					
	What section of the Plan was addressed by Consultation?	Housing Need Assessment					
		Homeless Needs - Chronically homeless					
		Homeless Needs - Families with children					
		Homelessness Needs - Veterans					
		Homelessness Needs - Unaccompanied youth					
		Homelessness Strategy					
	Briefly describe how the Agency/Group/Organization was	The Toledo-Lucas County Homelessness Board (TLCHB) is regularly consulted on all aspects					
	consulted. What are the anticipated outcomes of the	of ending homelessness in Toledo. The TLCHB was consulted during the creation of this					
	consultation or areas for improved coordination?	Annual Action Plan. TLCHB also receives HOME funds as a subrecipient to carry out Tenant					
		Based Rental Assistance (TBRA) activities. The COT will continue to collaborate with the					

3	Agency/Group/Organization	The Fair Housing Center (TFHC)
	Agency/Group/Organization Type	Housing
		Services - Housing
		Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
		Public Housing Needs
		Fair Housing
	Briefly describe how the Agency/Group/Organization was	The COT worked with the Fair Housing Center to create the Analysis of Impediments (AI).
	consulted. What are the anticipated outcomes of the	The Fair Housing Center uses AI to develop action plans for removing impediments. The COT
	consultation or areas for improved coordination?	will continue to work with the Fair Housing Center to remove barriers to Fair Housing.
4	Agency/Group/Organization	Lucas County Land Reutilization Corporation (Land Bank)
4	Agency/Group/Organization Agency/Group/Organization Type	Lucas County Land Reutilization Corporation (Land Bank) Housing
4		
4		Housing
4		Housing Services - Housing
4	Agency/Group/Organization Type	Housing Services - Housing Regional organization
4	Agency/Group/Organization Type	Housing Services - Housing Regional organization Housing Need Assessment
4	Agency/Group/Organization Type What section of the Plan was addressed by Consultation?	Housing Services - Housing Regional organization Housing Need Assessment Market Analysis
4	Agency/Group/Organization Type What section of the Plan was addressed by Consultation? Briefly describe how the Agency/Group/Organization was	Housing Services - Housing Regional organization Housing Need Assessment Market Analysis When it comes to vacant or abandoned properties, the COT consults with the Lucas County

Table 2 - Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

All pertinent agencies in the City and County were consulted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
	Toledo Lucas County	Homelessness elimination is a goal of both the CoC CASE Plan and the City of Toledo's 2020-2024 Five-
Continuum of Care	Homelessness Board	Year Consolidated Plan. The COT collaborates with the CoC to implement strategies to end
	nomelessiless Board	homelessness.

Table 3 - Other local / regional / federal planning efforts

Narrative (optional)

The City of Toledo's Department of Housing and Community Development has developed many relationships in the community, which has resulted in the development of effective strategies for addressing community issues. Individuals, neighborhood groups, investors, and organizations all work together to ensure Toledo's stability and growth. The DHCD will continue to cultivate relationships that will result in the Consolidated Plan being implemented effectively and efficiently.

The Department has consulted with Buckeye Broadband, a local internet services provider, to discuss efforts to narrow the digital divide for underserved populations. Buckeye Broadband, through its corporate giving program, provides free internet services to community centers, libraries, and senior citizen centers. As opportunities arise to extend internet service to LMI individuals, the City anticipates further collaboration with Buckeye Broadband in meeting these needs.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Citizen Participation Process (CPP) is critical to the development of the Annual Action Plan. The COT has two Citizen Review Committees (CRCs); one for non-homeless and the other for homeless services, each comprised of residents with general or specific knowledge of community programs and an understanding of community issues. CRC members from the following community sectors were used for application evaluations, interviews with potential agencies, and funding recommendations: banking, religious, healthcare, public libraries, economic development, and social service agencies.

All related events were publicized two weeks in advance in The Blade, the Toledo Journal, and/or Sojourner's Truth and La Prensa (minority papers), as well as on the COT's website. Minority papers target the African-American and Hispanic communities.

The notices were published as follows:

November 20 and **November 23**, 2022 - Public Notice announcing the mandatory application packet pickup held **January 13**, 2023.

December 30, 2022 - Press Release announcing the mandatory application packet pickup sent to Mayor's Office for release to the news and social medias.

March 1 and **March 5**, 2023 - Public Notice announcing the availability of the DRAFT 2023-2024 Action Plan, the 30-day comment period and the public hearings.

March 6, 2023 - Press Release on the availability of the DRAFT 2023-2024 Action Plan, the 30-day comment period and the public hearings sent to Mayor's Office for release to the news and social medias.

Furthermore, all Public Notices and Press Releases are emailed to local community partners as well as the COT's Third-Party Partners. Beginning **March 22**, 2023, public comments were accepted until **April 20**, 2023.

Two virtual public hearings were held via Zoom on **March 23**, 2023 and **March 30**, 2023 at 5:30 p.m. All public hearings are held in buildings that are accessible to disabled individuals, wheelchair accessible, and include handicapped parking. If there is a virtual public hearing, people with disabilities can request services.

The Department consulted with Buckeye Broadband, a local internet services provider, to discuss efforts to narrow the digital divide for underserved populations. Buckeye Broadband, through its corporate giving program, provides free internet services to community centers, libraries, and senior citizen centers. As opportunities arise to extend internet service to LMI individuals, the City anticipates further collaboration with Buckeye Broadband in meeting these needs.

The City of Toledo examined the approaches being utilized to close what is known as the "Digital Divide," or the lack of broadband connectivity for low-income households. From the dataset of 2014 through 2017 to the dataset of 2017 through 2021, there has been a modest overall increase. The analysis, which covered the years 2017 through 2021, revealed that overall growth in broadband connectivity was less than 5%. By 2022, 90.5

percent of Toledo households had access to a computer, while roughly 83.4 percent had access to broadband internet.

Lucas County Emergency Management Agency (LCEMA) prepared the Lucas County Mitigation Plan of 2019, which is an update of the Countywide All-Natural Hazard Mitigation plan of 2013. The Plan's purpose as stated was "to identify risks and vulnerabilities from hazards that affect Lucas County, Ohio to prevent or reduce the loss of life and injury and to limit future damage costs by developing methods to mitigate or eliminate damage from various hazards." The City partnered with LCEMA and other jurisdictions to further identify, define, and characterize the hazards affecting the City and prioritize projects that reduce hazard vulnerability of households especially those with low incomes. Technological/human caused hazards such as civil disturbance and terrorism and natural hazards including severe winter storms and temperature extremes due to climate change were added.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspap er Ad	Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	N/A	N/A	N/A	http://www.toledoblade.com/ http://www.thetoledojournal.com/ http://www.laprensatoledo.com/ http://www.thetruthtoledo.com/
2	Public Hearing	Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	A total of 13 residents (3/23/2023 - 8 residents and 3/30/2023 - 5 residents) attended the two virtual public hearings.	There were no public comments at the hearings.	All comments were accepted.	https://toledo.oh.gov/departments/hous ing-community-development

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The public notice was posted on the City's website and the COT is unable to determine number of persons accessing the information online.	N/A	N/A	https://toledo.oh.gov/departments/hous ing-community-development
4	Social Media	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The public notice was posted on the City's social media sites and the COT is unable to determine number of persons accessing the information online.	N/A	N/A	https://m.facebook.com/cityoftoledo/

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The table below summarizes the expected resources available to address the Annual Action Plan's goals. The City anticipates receiving entitlement funding in the amount of \$7,355,028 in CDBG, \$2,551,780 in HOME, and \$648,066 in ESG for its PY 2023-2024 Annual Action Plan.

Other funds available to the community are listed in this section because they have an impact on the plan's goals and help to address community needs identified in the 2020-2024 Five-Year Consolidated Plan.

Anticipated Resources

Program	Source of	Uses of Funds	Expe	cted Amoui	nt Available Yo	ear 1	Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	Public - Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	7,355,028	223,679	382,790	7,961,497	0	According to HUD, the Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community development needs. The CDBG program works to ensure decent, affordable housing, to provide services to the most vulnerable members of our communities, and to create jobs through business expansion and retention. Every program year, the annual allocations are typically fully expended.

Program	Source of	Uses of Funds	Ехре	ected Amou	nt Available Y	ear 1	Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HOME	Public - Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership	2.554.700		1 261 202	2.012.072		According to HUD, the HOME Investment Partnerships Program (HOME) provides formula grants to States and Localities that communities use to fund a variety of activities such as homeowner rehabilitation, home buyer activities, rental housing, and tenant- based rental assistance (TBRA), with the goal of providing safe, adequate, and decent affordable housing to low-income households and expanding the capacity of non-profit housing providers.
		TBRA	2,551,780	0	1,261,292	3,813,072	0	

Program	Source of	Uses of Funds	Expe	cted Amou	nt Available Yo	ear 1	Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
ESG	Public - Federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional						In accordance with the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance Rapid Transition to Housing (HEARTH) Act, HUD distributes Emergency Solutions Grant (ESG) funds to communities for street outreach, emergency shelter, homelessness prevention, rapid rehousing assistance, and homeless management information systems (HMIS). Every program year, the annual allocations are typically spent.
		housing	648,066	0	0	648,066	0	

Program	Source of	ource of Uses of Funds Expected Amount Available Year 1				ear 1	Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
Continuum of Care	Public - Federal	Admin and Planning Rapid re-housing (rental assistance) Rental Assistance TBRA Transitional housing	4,734,000	0	0	4,734,000	0	The Continuum of Care (CoC) Program is intended to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by non-profit providers, as well as State and local governments, to quickly re-house homeless individuals and families while minimizing the trauma and dislocation caused by homelessness; and promote access to and utilization of mainstream programs by homeless individuals and families.
Section 108	Public - Federal	Acquisition Economic Development Housing Other: Public Facilities						The HUD Section 108 Loan Pool is open to prospective borrowers throughout the city and offers long-term, fixed-rate, and reasonably priced financing. Funds will be used to bridge financing gaps and enable borrowers to proceed with their respective transactions; create and retain job; increase affordable housing; advance equity and equitable development opportunities and expand on the existing tax base.
			37,000,000	0	0	37,000,000	0	

Program	Source of	Uses of Funds	Ехре	pected Amount Available Year 1			Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
Other: BP Husky Settlement	private	Homeowner rehab Housing Multifamily rental rehab Other: Lead Hazard Control						This grant, in collaboration with the Toledo Lucas County Health District, will be used in conjunction with the Lead Hazard Control and Health Homes grant to assist property owners in the control of lead paint hazards.
		and Abatement	830,554	0	0	830,554	0	
Other: Neighborhood Stabilization Programs (NSP)	Public - Federal	Acquisition Admin and Planning Homeowner rehab New construction for	500 528	0	0	500 528	0	Beginning in 2009, the COT received HUD NSP funds for focused efforts in revitalizing areas with the highest concentration of foreclosures. The initial NSP funds have been completely depleted. NSP2 has been officially closed out. The program income from the NSP1 and NSP3 programs will be used to complete a proposed project for the PY 2023.
		ownership	500,528	0	0	500,528	0	

Program	Source of	Uses of Funds	Ехре	cted Amou	nt Available Y	ear 1	Expected	Narrative Description	
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$		
Other: HUD Office of Lead Hazard Control and Healthy Homes	Public - Federal	Admin and Planning Homeowner rehab Housing Multifamily rental rehab Other: Lead						The HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) provided funds to the City of Toledo to provide financial assistance to property owners to help control lead paint hazards in both owner-occupied and rental residential units within the City of Toledo.	
		Hazard Control and Abatement	4,182,857	0	0	4,182,857	0		
Other: Lead Hazard Control and Healthy Homes	Public - Federal	Admin and Planning Homeowner rehab Housing Multifamily rental rehab Other: Lead Hazard Control and Abatement	164,520	0	0	164,520	0	A pilot program that will connect the Lead Hazard Control and Healthy Homes (LHCHH) grant administered by the Department of Housing and Community Development with the Weatherization Assistance Program (WAP) administered by NeighborWorks Toledo Region.	

Program	Source of	Uses of Funds	Expe	cted Amour	nt Available Y	ear 1	Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
Other:	Public	Other:						CDBG-CV funds to be used to prevent, prepare
CDBG-CV	-	To prevent,						for and respond to the Coronavirus.
	Federal	prepare for and respond to the Coronavirus	1,267,110	0	0	1,267,110	0	CDBG-CV - 1st round \$4,453,360 CDBG-CV - 3rd round \$1,526,505
Other:	Public	Other:	1,207,110	0	U	1,207,110	0	ESG-CV funds to be used for homeless services
ESG-CV	- Federal	To prevent, prepare for and respond to the						to prevent, prepare for and respond to the Coronavirus.
		Coronavirus						ESG-CV - 1st round \$2,249,248
			165,772	0	0	165,772	0	ESG-CV - 2nd round \$2,626,090
Other:	Public	Rental Assistance						The United States Department of the Treasury
United States	-							is providing funds to individuals and families
Department of the	Federal							for up to six months of rental assistance.
Treasury			28,990,204	0	0	28,990,204	0	

Table 5 - Expected Resources - Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Many of the goals outlined in the 2020-2024 Five-Year Consolidated Plan and Annual Action Plans are funded primarily through CDBG. The combination of federal funds with other state and local resources increases the community's capacity to address many of its needs. The combined resources, as well as the efficiencies gained through strategic partnerships with other organizations, provide the City with a greater capacity to address the needs identified in the Consolidated Plan. By combining HUD funds with these other resources, we can increase the availability of the numerous benefits provided by these programs. These combined resources are used to increase homeownership for low- to moderate-income residents, address the homelessness crisis, create a more suitable living environment, provide decent, safe, and sanitary housing, address blight, and engage in a variety of other beneficial activities.

Both the HOME and ESG funds have mandatory matching requirements. While CDBG funds do not require a match, all third-party partners who receive an allocation must provide a 1:1 cash match for each dollar received, according to DHCD policy. Applicants who receive CDBG or ESG funds must identify and document the match both in their funding applications and throughout the program year. HUD determines the match requirement for HOME funds based on criteria related to severe fiscal distress. According to CFR 92.218, contributions counted as a match must equal at least 25% of funds drawn from HOME. The City's 2022 matching requirement remains at 0% and is expected to remain so in 2023.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The Lucas County Land Reutilization Corporation (Land Bank) is a community improvement corporation dedicated to strengthening Lucas County neighborhoods by strategically repurposing vacant, abandoned, and tax-delinquent properties through an open and equitable process.

CDBG and HOME-funded programs may obtain publicly owned land or property through the Land Bank to carry out housing, economic, and community development activities. The Land Bank acquires residential and commercial properties for renovation and demolition. In collaboration with the City of Toledo, the Land Bank will also acquire vacant land for project assembly, side lot opportunities, and long term holding and maintenance. Furthermore, the Land Bank assists eligible residents in purchasing and renovating properties, and it collaborates with community members in repurposing vacant lots from demolitions for use by residents, community groups, and neighborhood leaders. Vacant lots are sometimes offered to neighboring homeowners in order to increase lot sizes.

The Land Bank assists in meeting the following goals and objectives established in this plan by assisting in meeting HUD's CDBG objective of benefiting to low- and moderate-income persons and elimination of slum and blight:

- Demolition of Blighted Properties
- Decrease Rodents in the City of Toledo
- Establish and Maintain Community Gardens
- Contaminated Sites Remediation for Re-development
- Down Payment/Closing Costs Assistance (through acquisition and rehabilitation of properties)
- New construction (only by Community-Based Development Organizations CBDO's)

Furthermore, CDBG funds will be used to promote economic development opportunities by assisting for-profit businesses with the attraction or retention of businesses and jobs, façade improvements, and tax and real estate incentives.

Discussion

The City is funding and participating in a number of community planning initiatives with a wide range of stakeholders. These sessions resulted in the creation of several community plans with a clear vision, goals, objectives, and proposed activities, as well as potential funding sources. The city has been investing in these areas and saw an opportunity to combine CDBG, HOME, and ESG funds with other city capital expenditures and private sector financing. In addition, the City is reviewing its service delivery system to ensure that it is efficient and effective. It was discussed whether external organizations, such as community-based non-profits, should be used to deliver some services instead of internal departments. Subrecipients' organizational capacity, increased collaboration, and assistance in gaining access to other sources of funding were also highlighted.

Annual Goals and Objectives AP-20 Annual Goals and Objectives

Goals Summary Information

Sort	Goal Name	Start	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order 1	HOME: Home Buyer Development	Year 2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions	HOME: \$300,000	Homeowner Housing Added: 6 Household Housing Unit
						Increase Home Repairs and Housing Preservation		
2	Home Buyer Down Payment/ Closing Costs Assistance	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability	HOME: \$213,835 \$189,203 (Carryover)	Direct Financial Assistance to Homebuyers: 15 Households Assisted
3	Large rental housing/low-income housing tax credit	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation	HOME: \$1,000,000 \$789,361 (Carryover)	Rental units constructed: 30 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Improvements to parks and community facilities	2020	2024	Non-Housing Community Development	Citywide Low to Moderate Income & Slum and Blight	Improving Neighborhood Conditions	CDBG: \$1,717,210 \$282,790 (Carryover)	Other: 1 Other
5	Slum and blight reduction	2020	2024	Non-Housing Community Development	Citywide Low to Moderate Income & Slum and Blight	Improving Neighborhood Conditions	CDBG: \$63,000	Housing Code Enforcement/Foreclosed Property Care: 950 Household Housing Unit
6	Home Repairs for Seniors and the Disabled	2020	2024	Affordable Housing Non-Homeless Special Needs	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Other Special Need	CDBG: \$500,000	Homeowner Housing Rehabilitated: 134 Household Housing Unit

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
7	Housing Repairs and	2020	2024	Affordable	Citywide	Improving Housing	CDBG:	Homeowner Housing
	Rehabilitation			Housing		Affordability	\$1,200,000	Rehabilitated:
						Improving Neighborhood Conditions	HOME: \$400,000	165 Household Housing Unit
						Increase Home	\$28,913	
						Repairs and Housing	(Carryover)	
						Preservation	, ,	
8	Business	2020	2024	Non-Housing	Citywide	Econ Dev: Job	CDBG:	Businesses assisted:
	Recruitment/Retention			Community		Creation/Access and	\$100,000	10 Businesses Assisted
	Assistance			Development		Business Asst.	(Carryover)	
9	Coordinated Access for	2020	2024	Homeless	Citywide	Adequate Housing &	ESG:	Other: 2 Other
	Homelessness					Services for	\$85,500	
				Non-Housing		Homeless/At Risk		
				Community				
				Development				
10	Rapid Re-Housing and	2020	2024	Affordable	Citywide	Adequate Housing &	ESG:	Tenant-based rental
	Direct Financial			Housing		Services for	\$192,206	assistance/Rapid Rehousing:
	Assistance					Homeless/At Risk		104 Households Assisted
				Homeless				
11	Increase number of	2020	2024	Affordable	Citywide	Adequate Housing &	ESG:	Homeless Person Overnight
	emergency shelters			Housing		Services for	\$321,755	Shelter:
						Homeless/At Risk		1,000 Persons Assisted
				Homeless				
12	Increase or new public	2020	2024	Non-Housing	Citywide	Provide and expand	CDBG:	Public service activities other
	services			Community		Public (Social)	\$1,103,254	than Low/Moderate Income
				Development		Services - 15%		Housing Benefit:
								11,600 Persons Assisted

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
13	Fair Housing Planning &	2020	2024	Non-Housing	Citywide	Fair Housing	CDBG:	Public service activities other
	Services			Community			\$150,000	than Low/Moderate Income
				Development				Housing Benefit:
								500 Persons Assisted
14	HOME CHDO Set-aside	2020	2024	Affordable	Citywide	Improving Housing	HOME:	Homeowner Housing
				Housing		Affordability	\$382,767	Rehabilitated:
								5 Household Housing Unit
						Improving	\$253,815	
						Neighborhood	(Carryover)	
						Conditions	(== /= = /	
						Increase Home		
						Repairs and Housing		
						Preservation		

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order 15	Planning and	Year 2020	Year 2024	Affordable	Citywide	Improving Housing	CDBG:	Other: 1 Other
13	Administration - CDBG	2020	2024	Housing	Citywide	Affordability	\$1,321,006	Other. I Other
	Administration - CDBG			Housing		ratoradomey	\$1,321,000	
				Public Housing		Improving		
				Public Housing		Neighborhood		
						Conditions		
				Homeless				
						Increase Home		
				Non-Homeless		Repairs and Housing		
				Special Needs		Preservation		
						Econ Dev: Job		
				Non-Housing		Creation/Access and		
				Community		Business Asst.		
				Development				
						Adequate Housing &		
						Services for		
						Homeless/At Risk		
						Provide and expand		
						Public (Social)		
						Services - 15%		
						Fair Housing		
						Improve Public		
						Infrastructure for		
						LMI Households		!

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order 16	Housing Rehabilitation Administration - CDBG	Year 2020	Year 2024	Affordable Housing	Citywide	Improving Housing Affordability	CDBG: \$1,150,558	Other: 1 Other
				J. T. J.		Improving Neighborhood Conditions	, , , , , , ,	
						Increase Home Repairs and Housing Preservation		
17	HOME Administration	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability	HOME: \$255,178	Other: 1 Other
				Public Housing		Improving Neighborhood		
				Homeless		Conditions		
						Increase Home Repairs and Housing		
						Preservation		
						Adequate Housing & Services for Homeless/At Risk		
18	Establish and Maintain	2020	2024	Non-Housing	Citywide	Improving	CDBG:	Public service activities other
	Community Gardens			Community Development	Low to Moderate	Neighborhood Conditions	\$162,000	than Low/Moderate Income Housing Benefit:
					Income & Slum and Blight	Provide and expand Public (Social)		3,245 Persons Assisted
						Services - 15%		

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order 19	Local affordable housing capacity – public services	Year 2020	Year 2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions	Section 108: \$37,000,000 CDBG: \$329,998	Other: 1 Other
						Increase Home Repairs and Housing Preservation		
						Econ Dev: Job Creation/access and Business Asst.		
						Provide and expand Public (Social) Services – 15%		

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	HOME: Home Buyer Development
	Goal Description	The City will use HOME funding for new construction or acquisition rehab of single-family homes for homeownership.
2	Goal Name	Home Buyer Down Payment/Closing Costs Assistance
	Goal Description	The City will use HOME funding for down payment and closing costs assistance for low- to moderate-income first-time homebuyers.
3	Goal Name	Large rental housing/low-income housing tax credit
	Goal Description	The City will provide HOME funding to assist developers with the new construction and preservation of large multi-family rental
		housing projects for low- to moderate income tenants including low-income housing tax credit (LIHTC) funded projects.
4	Goal Name	Improvements to parks and community facilities
	Goal Description	The City will provide CDBG funding for improvements to parks and recreational facilities in low- to moderate-income (LMI) areas or
		that benefit LMI residents.

5	Goal Name	Slum and blight reduction
	Goal Description	The City will provide CDBG funding for the administrative costs to the Lucas County Regional Health District for proactive rodent
		inspections and follow-up actions such as citations and court nuisance orders.
6	Goal Name	Home Repairs for Seniors and the Disabled
	Goal Description	The City will provide CDBG funding to be reallocated to home repairs and accessibility modifications to allow mainly seniors and
		people with disabilities to remain in their residences, including emergency repairs.
7	Goal Name	Housing Repairs and Rehabilitation
	Goal Description	The City will provide HOME and CDBG funding to provide housing assistance for rehabilitation of existing owner-occupied housing for low income households.
8	Goal Name	Business Recruitment/Retention Assistance
	Goal Description	The City will allocate CDBG funds to programs and assistance to encourage establishment and growth of small and medium private business (grants/loans/technical assistance/incentives).
9	Goal Name	Coordinated Access for Homelessness
	Goal Description	The City will allocate ESG funds to operate a centralized system for homeless assistance to determine needs and match
		individuals/families with the type of assistance needed.
		The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County
		Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds.
10	Goal Name	Rapid Re-Housing and Direct Financial Assistance
10	Goal Description	Provide rental financial assistance using HOME funding to prevent homelessness and assist the homeless in obtaining/retaining
		permanent housing.
11	Goal Name	Increase number of emergency shelters
	Goal Description	Provide temporary shelter for the homeless for a period of 90 days or less. Supportive services may or may not be provided in addition to shelter.
12	Goal Name	Increase or new public services
	Goal Description	Provide CDBG funding for Public Services including programs for youth and seniors, community, non-profit capacity building, etc.
		carried out by community-based non-profits.
13	Goal Name	Fair Housing Planning & Services
	Goal Description	Elimination of discrimination in the provision of housing and housing-related services and elimination of segregation by affirmatively
		promoting inclusive communities and increasing supply of genuinely open housing.
14	Goal Name	HOME CHDO Set-aside
	Goal Description	The City will use HOME funding for the 15% set aside for community housing development corporations (CHDOs) and operating
		assistance to build new or rehabilitate single or multi-family housing for low to moderate-income households.

15	Goal Name	Planning and Administration - CDBG
	Goal Description	The general operations as it relates to the administration and reporting requirements, administration and staff monitoring of programs, neighborhood revitalization and fiscal oversight.
16	Goal Name	Housing Rehabilitation Administration - CDBG
	Goal Description	The administration of staff costs related to the housing rehabilitation and development programs operated by the Department of Housing and Community Development Housing Division entitlement grant and estimated program income from housing loan repayments will be used for activity delivery costs related to the housing rehabilitation program.
17	Goal Name	HOME Administration
	Goal Description	The administration and staff costs related to the operation of housing rehabilitation and development programs funded by the HOME Program.
18	Goal Name	Establish and Maintain Community Gardens
	Goal Description	Provide use of CDBG funds to establish and maintain community and rain gardens as well as promote urban agriculture in underutilized and vacant lots.
19	Goal Name	Local affordable housing capacity – public services
	Goal Description	The City will use CDBG funding for financial and technical assistance to build the capacity of local non-profit real estate developers of affordable housing.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

The following is an estimate of the number of families who will be provided affordable housing as defined by HOME:

- 36 extremely low-income families, and
- 22 low- and moderate-income families.

Projects

AP-35 Projects - 91.220(d)

Introduction

The COT's priority housing and community development needs were identified in the 2020-2024 Five-Year Consolidated Plan. The DHCD will coordinate the use of federal funds for the City's strategies and actions to meet the needs of low- to moderate-income households and communities.

The following are the proposed projects that will be undertaken in the 2023 (49th) PY with CDBG, HOME, and ESG funding to address the Consolidated Plan's priority needs and objectives. To match actual allocation amounts, the budgets for all proposed projects were increased or decreased in proportion to the estimated funding levels.

Projects

Proje #	Project Name
1	DHCD: Planning and Administration
2	DHCD: Housing Rehabilitation Administration
3	DHCD: HOME Administration
4	Community Housing Development Organization (CHDO) Set-Aside
5	Homeowner Rehabilitation (Subrecipient and Internal)
6	Rental Housing Development
7	Home at Last Down Payment Assistance (DPA) Program
8	Home Buyer Development
9	Arts Commission of Greater Toledo, Inc
10	Believe Center Inc
11	Children's Theatre Workshop
12	Compassion Health Toledo
13	East Toledo Family Center
14	Fair Housing Opportunities of Northwest Ohio
15	Grace Community Center
16	Historic South Initiative
17	Jumpstart Inc
18	Legal Aid of Western Ohio Inc
19	Lucas County Regional Health District
20	Lucas Metropolitan Housing (LMH)/Lucas Housing Services Corporation (LHSC)
21	Martin Luther King Center for the Poor
22	Maumee Valley Habitat for Humanity
23	Neighborhood Health Association of Toledo Inc
24	NeighborWorks Toledo Region
25	Pathway Inc
26	Sofia Quintero Art & Cultural Center
27	Toledo GROWs

#	Project Name			
28	Toledo Seagate Food Bank			
29	HESG-2023 Homeless Services - ESG			
30	COT Rooftop Program			
31	Toledo Neighborhood Capacity Building Institute (TNCBI)			
32	Wayman Palmer YMCA			
33	Coordinate with other Homeless Related Assistance			
34	HUD Section 108			
35	Public Service Capacity Dollars			
36	CDBG Project - TBD			

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Toledo's priorities were determined by analyzing data from the Citizens Participation and Agency Consultation Process section of the 2020-2024 Five-Year Consolidated Plan, as well as information from the Needs Assessment and Market Analysis sections.

The analysis resulted in the identification of priority needs and associated goals to address these needs. The following are the top priorities:

- Improve Housing Affordability
- Improve Neighborhood Conditions
- Increase programs for Home Repair and the Preservation of Existing Affordable Housing
- Create Jobs and Provide access to Job/Skills Training
- Homelessness: Provide Adequate Housing and Services for Special Needs Population
- Provide Adequate Housing and Services for Special Needs Populations
- Other Identified Public Service Community Needs
- Fair Housing
- Improve Public Infrastructure for LMI Households

To address these needs, the following goals have been established: homeownership housing, rental housing, affordable housing capacity, improvements to parks and community facilities, slum and blight reduction, home repairs, particularly for the elderly, job creation and retention, business assistance, emergency and permanent housing for the homeless, and special need populations.

The greatest hurdle to addressing underserved needs in the City is a decrease in program financing as a result of federal, state, and municipal budget cuts. Housing and non-housing activity financing is insufficient to meet the demand for unmet needs. In recent years, the total amount requested has frequently exceeded the total amount available. Inadequate financial resources have also been identified as the most significant barrier to organizations serving underserved needs. Agencies highlighted a shortage of volunteers, increased collaboration among social service agencies, employee turnover and capacity, client transportation needs, program eligibility limits and marketing, and a lack of awareness of program offerings as hurdles to serving underserved needs.

The Coronavirus Pandemic continues to be a minor impediment to the City and many of its subrecipients' ability to address the needs of Toledo's underserved. Furthermore, rising material and service costs, as well as supply chain issues and labor shortages, have had an impact on Third-Party Partners who serve low- to moderate-income individuals and families.

Concerning housing, the City contracted with the Toledo Fair Housing Center in 2020 to complete an Analysis of Impediments to Fair Housing Choice (AI), which identified barriers to obtaining safe, adequate, and decent affordable housing. In collaboration with community partners, the City and the Fair Housing Center collaborate in the implementation of a Fair Housing Action Plan to remove barriers to fair and affordable housing.

Please visit the Department of Housing and Community Development website at: https://toledo.oh.gov/departments/housing-community-development to view a copy of the Analysis of Impediments to Fair Housing Choice, which includes the Fair Housing Action Plan.

AP-38 Project Summary

Project Summary Information

1	Project Name	DHCD: Planning and Administration
	Target Area	Citywide
	Goals Supported	Planning and Administration - CDBG
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
		Econ Dev: Job Creation/Access and Business Asst.
		Adequate Housing & Services for Homeless/At Risk
		Adequate Housing & Services for Other Special Need
		Provide and expand Public (Social) Services - 15%
		Fair Housing
		Improve Public Infrastructure for LMI Households
	Funding	CDBG: \$1,321,006
	Description	The general operations in terms of administration and reporting
		requirements, program administration and staff monitoring,
		neighborhood revitalization, and fiscal oversight.
	Target Date	6/30/2024
	Estimate the number and type of	N/A
	families that will benefit from the	
	proposed activities	
	Location Description	City of Toledo, Department of Housing and Community Development
		One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	All CDBG-funded activities, such as staffing for activities related to the
		planning, administration, development, and implementation of the
		Consolidated Plan, Annual Action Plan, and CAPER. These include the
		following: information tracking and compilation; federal grant reporting;
		IDIS data input; fiscal oversight; CDBG activity monitoring (on-site
		monitoring visits, review and evaluation of agency information,
		assessment of progress and completion of activities, compliance with
		Federal regulations, and so on); general administration of funds and
		related activities.
2	Project Name	DHCD: Housing Rehabilitation Administration
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation Administration - CDBG
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
		Adequate Housing & Services for Homeless/At Risk
		Adequate Housing & Services for Other Special Need
	<u> </u>	Adequate Housing & Services for Other Special Need

	Funding	CDBG: \$1,150,558
	Description	The administration of staff costs associated with the Department of
		Housing and Community Development Housing Division and Partners'
		housing rehabilitation and development programs.
	Target Date	6/30/2024
	Estimate the number and type of	N/A
	families that will benefit from the	
	proposed activities	
	Location Description	City of Toledo, Department of Housing and Community Development
		One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	Owner-Occupied Rehabilitation; Homebuyer unit production through new
		construction or acquisition; rehabilitation and resale; down payment and
		closing costs through the Home-At-Last Program; Paint, Roof, and
		Emergency Repair Programs; Lead-Based Paint Hazard Programs; and
		Rental Housing Development Projects are among the activities related to
		the administration duties of the Housing Division.
3	Project Name	DHCD: HOME Administration
	Target Area	Citywide
	Goals Supported	HOME Administration
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
		Adequate Housing & Services for Homeless/At Risk
	Funding	HOME: \$255,178
	Description	The administration and staff costs associated with the operation of
		HOME-funded housing rehabilitation and development programs.
	Target Date	6/30/2024
	Estimate the number and type of	N/A
	families that will benefit from the	
	proposed activities	
	Location Description	City of Toledo, Department of Housing and Community Development
		One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	The activities include all management and Housing Division staff planning
		and administration duties. Underwriting analysis of all projects, including
		the owner-occupied program and the down payment assistance program;
		administration and monitoring of the tenant-based rental assistance
		(TBRA) program; all aspects of homeownership financial assistance to
		eligible applicants; maintenance of records to support compliance with all
		federal regulations; data entry into IDIS; and ongoing evaluation of
		programs, procedures, and policies are among the responsibilities.
		Administrative funds for TBRA Third-Party Partners are also included.

4	Project Name	Community Housing Development Organization (CHDO) Set-Aside		
	Target Area	Citywide		
	Goals Supported	HOME CHDO Set-aside		
	Needs Addressed	Improving Housing Affordability		
		Improving Neighborhood Conditions		
		Increase Home Repairs and Housing Preservation		
	Funding	HOME: \$382,767		
		HOME: \$253,815 (Carryover)		
	Description	GAP financing and \$100,000 in operating assistance are available for		
		single- or multi-family rehabilitation or new construction projects owned,		
		developed, or sponsored by Community Housing Development		
		Organizations (CHDOs).		
	Target Date	6/30/2024		
	Estimate the number and type of	5 low- and moderate-income households will benefit from this activity.		
	families that will benefit from the			
	proposed activities			
	Location Description	Citywide		
	Planned Activities	The rehabilitation or new construction of single-family homeownership		
		units, as well as the rehabilitation or new construction of single-family or		
		multi-family rental units.		
5	Project Name	Homeowner Rehabilitation (Subrecipient and Internal)		
	Target Area	Citywide		
	Goals Supported	Housing Repairs and Rehabilitation		
	Needs Addressed	Improving Housing Affordability		
		Improving Neighborhood Conditions		
		Increase Home Repairs and Housing Preservation		
	Funding	HOME: \$400,000		
		HOME: \$28,913 (Carryover)		
	Description	To assist low- and moderate-income homeowners with housing		
		rehabilitation in order to restore their homes to decent, safe, and sanitary		
		conditions, thereby preserving the housing stock. Implemented by sub-		
		recipients and the City of Toledo Housing Division.		
	Target Date	6/30/2024		
	Estimate the number and type of	15 low- and moderate-income homeowners will benefit from this		
	families that will benefit from the	activity.		
	proposed activities			
	Location Description	Citywide		
	Planned Activities	To provide owner-occupied rehabilitation in order to address code		
		violations, health and safety concerns, and lead-based paint hazards.		
_		Troid troils, fred that and surety conferms, and read sused paint nazards.		
6	Project Name	Rental Housing Development		

Goals Supported	Large rental housing/low-income housing tax credit
Needs Addressed	Improving Housing Affordability
	Improving Neighborhood Conditions
	Increase Home Repairs and Housing Preservation
Funding	HOME: \$1,000,000
-	HOME: \$789,361 (Carryover)
Description	The gap financing for new construction or rehabilitation of multi-unit
	rental housing developed by non-profit or for-profit developers, seniors,
	and families. The projects are chosen based on gap funding requirements
	consistency with COT affordable housing priorities, readiness to proceed
	and successfully securing all land use entitlement and project financing
	commitments.
Target Date	6/30/2024
Estimate the number and type of	30 low- and moderate-income households will benefit from this project.
families that will benefit from the	
proposed activities	
Location Description	Citywide
Planned Activities	The projects are intended to bridge the funding gap for developers and
	agencies working on multi-unit projects. These are multi-unit buildings
	that have undergone new construction, rehabilitation, or repurposing.
Project Name	Home at Last Down Payment Assistance (DPA) Program
Target Area	Citywide
Goals Supported	Home Buyer Down Payment/Closing Costs Assistance
Needs Addressed	Improving Housing Affordability
	Improving Neighborhood Conditions
	Increase Home Repairs and Housing Preservation
Funding	HOME: \$213,835
	HOME: \$189,203 (Carryover)
Description	To provide eligible first-time home buyer households purchasing single-
	family units with 0% interest deferred payment loans for down payment
	and closing cost assistance.
Target Date	6/30/2024
Estimate the number and type of	15 low- and moderate-income households will benefit from this project.
families that will benefit from the	
proposed activities	
Location Description	Citywide
Planned Activities	To assist low- and moderate-income homebuyers with down payments
	and closing costs.
Project Name	Home Buyer Development
Target Area	Citywide
Goals Supported	HOME: Home Buyer Development

	Needs Addressed	Improving Housing Affordability
	Treeds / tadiessed	Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
	Funding	HOME: \$300,000
	Description	The new construction or acquisition, rehabilitation, and resale of
	•	homebuyer units.
	Target Date	6/30/2024
	Estimate the number and type of	6 low- and moderate-income family will benefit from this activity.
	families that will benefit from the	, it is a second of the second
	proposed activities	
	Location Description	Citywide
	Planned Activities	To provide gap financing for new construction or acquisition,
		rehabilitation, and resale of homebuyer units. Green building standards
		will be followed during construction and rehabilitation.
9	Project Name	Arts Commission of Greater Toledo, Inc
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$20,000
	Description	A six-week summer youth employment training program for at-risk youth
		ages 14 to 19. The program provides summer employment in the arts,
		develops job skills, community connections, and technical arts skills.
	Target Date	6/30/2024
	Estimate the number and type of	13 youth ages 14-19 from low- and moderate-income families will benefit
	families that will benefit from the	from this activity.
	proposed activities	
	Location Description	Citywide
	Planned Activities	The following are some of the program activities geared toward the
		development of artistic and job skills:
		 job training through work experience;
		 transportation services as needed;
		 team building activities;
		 mural creation & digital design; and
		 creation of zines/podcasts/videos.
10	Project Name	Believe Center Inc
	Target Area	Citywide
		Old South End NRSA
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$50,000

	Description	To provide eligible youth in low- and moderate-income census tracts with
		sports, life skills, family, and educational programs.
	Target Date	6/30/2024
	Estimate the number and type of	50 low- and moderate-income youth ages 5-18 will benefit from this
	families that will benefit from the	project.
	proposed activities	
	Location Description	Old South End
	Planned Activities	The activities planned will provide opportunities to do the following:
		Youth Sports;
		 Educational Enhancement Programs (reading, writing, and math);
		and
		 Recreational Opportunities (field trips, tours, camping and etc.).
11	Project Name	Children's Theatre Workshop
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$10,000
	Description	During the school year, this activity will provide theatre outreach
		programs to youth in schools located in low-to-moderate income (LMI)
		neighborhoods, as well as theatre education programs for prek-8th
		grades.
	Target Date	6/30/2024
	Estimate the number and type of	250 low- and moderate-income youth will benefit from this project.
	families that will benefit from the	
	proposed activities	
	Location Description	Citywide
	Planned Activities	The Theatre Class will include musical theatre, devising/playwriting, and
		technical theatre. Additionally, the students will audition, rehearse, and
		perform public shows.
12	Project Name	Compassion Health Toledo
	Target Area	Citywide
		Old South End NRSA
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$70,000
	Description	This activity will directly address the issue of high infant mortality by
		providing comprehensive health care services to high-risk obstetric
		patients. A social worker and two community health workers will assist
		Health Care Providers in addressing the Social Determinants of Health
		with pregnant patients.
	Target Date	6/30/2024

	T	T
	Estimate the number and type of	108 low- and moderate-income individuals will benefit from this activity.
	families that will benefit from the	
	proposed activities	
	Location Description	Old South End
	Planned Activities	This activity includes the following services:
		 complete prenatal care;
		 complete reproductive plan;
		 connections to community social services;
		 attendance at nutrition, parenting, and prenatal (including
		breastfeeding) classes; and
		 active participation of fathers.
13	Project Name	East Toledo Family Center
	Target Area	Garfield /Starr/ Raymer
		Citywide
	Goals Supported	Home Repairs for Seniors and the Disabled
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
		Adequate Housing & Services for Other Special Need
	Funding	CDBG: \$75,000
	Description	This project includes administrative operations for minor repairs and
		home rehabilitation projects to help low- and moderate-income senior
		residents maintain healthy, safe, and sanitary living conditions.
	Target Date	6/30/2024
	Estimate the number and type of	94 low- and moderate-income seniors.
	families that will benefit from the	
	proposed activities	
	Location Description	Citywide
	Planned Activities	The activities for this project include: collaborating with the Area Office
		on Aging on the rehabilitation of privately owned, single-unit homes using
		construction dollars provided by the Area Office on Aging.
14	Project Name	Fair Housing Opportunities of Northwest Ohio
	Target Area	Citywide
	Goals Supported	Fair Housing Planning & Services
	Needs Addressed	Fair Housing
	Funding	CDBG: \$150,000

	Target Date Estimate the number and type of	This project includes activities to ensure that residents, regardless of income, have equitable housing options and to advance the implementation of the Analysis of Impediments (AI) Action Plan steps toward the elimination of impediments to equitable housing choice. (This Fair Housing activity is carried out as part of the general program administration of the Department of Housing and Community Development). 6/30/2024 500 individuals and families who could potentially be facing housing
	families that will benefit from the	discrimination will benefit from this activity.
	proposed activities Location Description	Citywide
	Planned Activities	Administrative activities related to housing discrimination include:
	Planned Activities	Fair Housing Enforcement;
		 Trainings (for the public and the housing industry);
		 Information dissemination at outreach events;
		Implementation of action steps identified in the Analysis of
		Impediments (AI); and
		Land-lord Tenant Education.
15	Project Name	Grace Community Center
	Target Area	Citywide
	Goals Supported	Establish and Maintain Community Gardens
	Needs Addressed	Improving Neighborhood Conditions
		Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$46,609
	Description	The project includes two activities: Activity 1: promote educational
		enrichment for k-6th graders to sustain or increase grade level growth
		during summer study and help youth learn positive life skills through
		social learning strategies; and Activity 2: a garden cooperative that will
		give families a stake in the garden beds and increase access to affordable
		home-grown vegetables.
	Target Date	6/30/2024
	Estimate the number and type of	30 youth will benefit from activity 1 and 65 persons will benefit from
	families that will benefit from the	activity 2 in low- and moderate-income areas.
	proposed activities	City would be
	Location Description Planned Activities	Citywide To promote adjusting a prichment for k 6th graders to suctain or
	Planned Activities	To promote educational enrichment for k-6th graders to sustain or increase grade level growth during summer study and to assist youth in
		learning positive life skills through social learning strategies and the
		garden designed to provide a variety of vegetables to families in low- to
		moderate-income areas throughout the growing season.
		meaning meaning and an analysis and Browning accepting

16	Project Name	Historic South Initiative
	Target Area	Old South End NRSA
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$50,000
	Description	The project will assist property owners and residents with repairs and/or
		rehabilitation in the Old South End.
	Target Date	6/30/2024
	Estimate the number and type of	15 low- and moderate-income households will benefit from this activity.
	families that will benefit from the	
	proposed activities	
	Location Description	Old South End
	Planned Activities	The repair or rehabilitation of properties in the Old South End.
		Furthermore, partnering with NeighborWorks and/or Maumee Valley
		Habitat for Humanity for interior and roofing for those residents who
		qualify.
17	Project Name	Jumpstart Inc.
	Target Area	Englewood NRSA
		Old South End NRSA
	Goals Supported	Business Recruitment/Retention Assistance
	Needs Addressed	Econ Dev: Job Creation/Access and Business Asst.
	Funding	CDBG: \$100,000 (Carryover)
	Description	To provide technical assistance to businesses.
	Target Date	6/30/2024
	Estimate the number and type of	10 businesses assisted.
	families that will benefit from the	
	proposed activities	
	Location Description	Englewood NRSA
		Old South End NRSA
	Planned Activities	To provide technical assistance to businesses located in the designated
		NRSA areas.
18	Project Name	Legal Aid of Western Ohio Inc
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$100,000
	Description	To provide high-quality legal services on housing issues to low- and
		moderate-income adults living in Toledo.
	Target Date	6/30/2024

	Estimate the number and type of families that will benefit from the	260 low- and moderate-income persons will benefit from this activity.
	proposed activities	
	Location Description	Citywide
	Planned Activities	The legal services for this project include the following:
		Comprehensive Legal Representation;
		Defense of eviction and foreclosure cases/secure affordable
		housing; and
		Addressing issues with unsuitable living conditions and
		unscrupulous landlords.
19	Project Name	Lucas County Regional Health District
	Target Area	Citywide
	Goals Supported	Slum and blight reduction
	Needs Addressed	Improving Neighborhood Conditions
	Funding	CDBG: \$63,000
	Description	The administrative costs of proactive rodent inspections and follow-up
		actions such as citations and court nuisance orders.
	Target Date	6/30/2024
	Estimate the number and type of	950 households will benefit from this project.
	families that will benefit from the	
	proposed activities	
	Location Description	Citywide
	Planned Activities	The administrative activities associated with addressing rodent control
		codes.
20	Project Name	Lucas Metropolitan Housing (LMH)
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
		Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$95,000
	Description	The project consists of two activities: activity 1: involves the repair or
		rehabilitation of LIHTC units in order to make them available for purchase
		by low- and moderate-income households through the LMH's nonprofit
		affiliate Lucas Housing Services Corporation (LHSC), and activity 2:
		involves providing financial education, counseling and coaching services,
		employment coaching and services, and income services and support to
		Lucas Metropolitan Housing (LMH) residents.
	Target Date	6/30/2024

	Estimate the number and type of	3 housing units will be repaired or rehabilitated for purchase by low- and
	families that will benefit from the	moderate-income households and 30 individuals or families will receive
	proposed activities	financial education and/or counseling.
	Location Description	City Forest and North River Homes Areas
		Central Toledo
	Planned Activities	The activities associated with the repair, rehabilitation, and purchase of
		properties, as well as financial education and/or counseling to LMH
		residents.
21	Project Name	Martin Luther King Center for the Poor
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$54,000
	Description	To provide grocery items, food supplements, and food boxes to low-
		income and homeless families, resulting in budget savings.
	Target Date	6/30/2024
	Estimate the number and type of	825 low- and moderate-income persons will benefit from this project.
	families that will benefit from the	
	proposed activities	
	Location Description	Citywide
	Planned Activities	The operational activities related to providing food boxes to low- and
		moderate-income residents and, as needed, delivering food boxes to
		senior citizens.
22	Project Name	Maumee Valley Habitat for Humanity
	Target Area	Citywide
		Old South End NRSA
		Englewood NRSA
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$400,000
	Description	This project includes roof repair/replacement in the NRSA neighborhoods
		as well as low- and moderate-income households throughout the city.
	Target Date	6/30/2024
	Estimate the number and type of	58 low- and moderate-income households will benefit from roof
	families that will benefit from the	repairs/replacements.
	proposed activities	
	Location Description	Citywide
	Planned Activities	This project will benefit the activities associated with performing roof
		repairs/replacements for low- and moderate-income families.

23	Project Name	Neighborhood Health Association of Toledo Inc
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$154,647
	Description	To provide direct medical care to low- and moderate-income Toledo
		residents through 13 community health centers. Primary care,
		preventative care, and specialty care will be available.
	Target Date	6/30/2024
	Estimate the number and type of	3,000 low- and moderate-income persons will benefit from this project.
	families that will benefit from the	
	proposed activities	
	Location Description	Citywide
	Planned Activities	Primary healthcare, preventative healthcare, and specialty care are
		examples of services related to physical health needs. Quality medical
		care, a full-service pharmacy at Nexus Health Care, care coordination for
		prescription assistance and other services, community service, and
		specialty care such as cardiology, women's health, and podiatry will be
		available to LMI clients. The Neighborhood Health Association also
		provides dental services (NHA).
24	Project Name	NeighborWorks Toledo Region
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$400,000
	Description	This project includes two activities: activity 1: housing and neighborhood
		development through homeowner-occupied rehabilitation and activity 2:
		improving the quality of life for Toledo residents through housing and
		financial education.
	Target Date	6/30/2024
	Estimate the number and type of	Low- and moderate-income individuals and families will benefit from the
	families that will benefit from the	activities undertaken under this project as follows: Activity 1: 50 housing
	proposed activities	units will be rehabilitated or repaired and Activity 2: 72 individuals or
		families will receive financial education and/or counseling.
	Location Description	Citywide
	Planned Activities	Activities directly related to the rehabilitation of owner-occupied homes
		and financial education and/or counseling to low- and moderate-income
		individuals or households.
25	Project Name	Pathway Inc

	Target Area	Citywide
	Goals Supported	Home Repairs for Seniors and the Disabled
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
		Adequate Housing & Services for Other Special Need
	Funding	CDBG: \$425,000
	Description	To provide emergency repairs on owner-occupied homes for very low- to
		low-income adults aged 62 and older, as well as the permanently
		disabled.
	Target Date	6/30/2024
	Estimate the number and type of	40 households will benefit from this project.
	families that will benefit from the	
	proposed activities	
	Location Description	Citywide
	Planned Activities	The activities associated with the rehabilitation of privately owned,
		single-family homes.
26	Project Name	Sofia Quintero Art & Cultural Center
	Target Area	Old South End NRSA
	Goals Supported	Establish and Maintain Community Gardens
	Needs Addressed	Improving Neighborhood Conditions
		Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$90,000
	Description	Increase capacity through community gardening, provide youth with
		educational and life skills development opportunities, and promote public
		art.
	Target Date	6/30/2024
	Estimate the number and type of	180 low- and moderate-income residents will benefit from the produce
	families that will benefit from the	grown in the gardens.
	proposed activities	
	Location Description	Old South End
	Planned Activities	The activities associated with low- to moderate-income residents
		benefiting from produce grown in community gardens.
27	Project Name	Toledo GROWs
	Target Area	Citywide
	Goals Supported	Establish and Maintain Community Gardens
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$48,000

	Description	To increase access to healthy food in low- and moderate-income areas of
		the city by establishing and maintaining community gardens. This activity
		will also include the transformation of blighted, vacant lots into beautiful,
		productive community gardens. Additionally, to collaborate with
		community agencies to refer individuals in need of supplemental food
		parcels.
	Target Date	6/30/2024
	Estimate the number and type of	3,000 persons residing in low- and moderate-income areas will benefit
	families that will benefit from the	from new or existing community gardens.
	proposed activities	
	Location Description	Citywide
	Planned Activities	Activities associated with the establishment and maintenance of
		community gardens, such as technical assistance in project planning,
		problem solving, volunteer assistance, and gardening education. In
		addition, coordinate the distribution of free seeds and plants, educational
		materials, and healthy foods.
28	Project Name	Toledo Seagate Food Bank
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$60,000
	Description	This project consists of two activities: Activity 1: providing balanced,
		nutritional food baskets to low- and moderate-income individuals in low-
		and moderate-income census tracts; and Activity 2: providing a
		supplemental food basket to individuals or families affected by the opioid
		epidemic through the Families in Recovery Staying Together (F.I.R.S.T)
		program.
	Target Date	6/30/2024
	Estimate the number and type of	4,449 low and moderate-income unduplicated individuals will be assisted
	families that will benefit from the	through activity 1 and 2,500 individuals through activity 2.
	proposed activities	
	Location Description	Citywide
	Planned Activities	The activities associated with the operation of a food bank, as well as the
		provision of supplemental food baskets to low- to moderate-income
		individuals or families affected by an opiate addiction.
29	Project Name	HESG-2023 Homeless Services - ESG
	Target Area	Citywide
	Goals Supported	Coordinated Access for Homelessness
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk
	Funding	ESG: \$648,066

	Description	The provision of services to the homeless and those at risk of becoming
		homeless in the community, as well as services related to the overall
		management of the community's homeless system.
	Target Date	6/30/2024
	Estimate the number and type of	Households will benefit from homeless services provided through the
	families that will benefit from the	Emergency Solutions Grant (ESG).
	proposed activities	
	Location Description	Citywide
	Planned Activities	The activities related to coordinated assessment, rapid re-housing, direct
		financial assistance, permanent supportive housing, emergency shelters,
		youth homelessness, Homeless Management Information System (HMIS)
		and administration of the TLCHB.
30	Project Name	COT Rooftop Program
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$475,000
	Description	To provide roof repair or replacement services in the City of Toledo.
	Target Date	6/30/2024
	Estimate the number and type of	30 low- and moderate-income households will benefit from a roof
	families that will benefit from the	repair/replacement.
	proposed activities	
	Location Description	Citywide
	Planned Activities	This project will benefit the activities associated with performing roof
		repairs/replacements for low- and moderate-income families.
31	Project Name	Toledo Neighborhood Capacity Building Institute (TNCBI)
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$150,000
	Description	Providing technical capacity training and project grants to nonprofit
		organizations to help them build organizational capacity and project
		management skills in order to carry out neighborhood revitalization and
		economic development activities.
	Target Date	6/30/2024
	Estimate the number and type of	6 non-profit organizations
	families that will benefit from the	
	proposed activities	
	Location Description	Citywide
		1

	Planned Activities	Activities will include organizational assessment, technical assistance, and
		the distribution of mini grants for CDBG eligible neighborhood and
		economic development projects, as well as project development for
		nonprofit organizations.
32	Project Name	Wayman Palmer YMCA
	Target Area	Citywide
	Goals Supported	Improvements to parks and community facilities
	Needs Addressed	Improve Public Infrastructure for LMI Households
	Funding	CDBG: \$1,717,210
		CDBG: \$282,790 (Carryover)
	Description	The activities associated with the construction of a new community
		center.
	Target Date	6/30/2024
	Estimate the number and type of	1 new community center to be constructed
	families that will benefit from the	
	proposed activities	
	Location Description	Citywide
	Planned Activities	The construction of a new community center, which will include
		multipurpose rooms for youth gaming, a demonstration kitchen, meeting
		rooms, gymnasiums, fitness rooms, and an indoor pool.
33	Project Name	Coordinate with other Homeless Related Assistance
33	•	
	Target Area	Citywide
	•	Citywide Coordinated Access for Homelessness
	Target Area	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk
	Target Area Goals Supported	Coordinated Access for Homelessness
	Target Area Goals Supported Needs Addressed	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related
	Target Area Goals Supported Needs Addressed Funding	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care.
	Target Area Goals Supported Needs Addressed Funding	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to
	Target Area Goals Supported Needs Addressed Funding	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by
	Target Area Goals Supported Needs Addressed Funding Description	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds.
	Target Area Goals Supported Needs Addressed Funding Description Target Date	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds. 6/30/2024
	Target Area Goals Supported Needs Addressed Funding Description Target Date Estimate the number and type of	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds.
	Target Area Goals Supported Needs Addressed Funding Description Target Date Estimate the number and type of families that will benefit from the	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds. 6/30/2024
	Target Area Goals Supported Needs Addressed Funding Description Target Date Estimate the number and type of families that will benefit from the proposed activities	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds. 6/30/2024 N/A
	Target Area Goals Supported Needs Addressed Funding Description Target Date Estimate the number and type of families that will benefit from the proposed activities Location Description	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds. 6/30/2024 N/A Citywide
	Target Area Goals Supported Needs Addressed Funding Description Target Date Estimate the number and type of families that will benefit from the proposed activities	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds. 6/30/2024 N/A Citywide Coordinate meetings, share data, fund program activities jointly and
	Target Area Goals Supported Needs Addressed Funding Description Target Date Estimate the number and type of families that will benefit from the proposed activities Location Description Planned Activities	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds. 6/30/2024 N/A Citywide Coordinate meetings, share data, fund program activities jointly and address policy issues.
34	Target Area Goals Supported Needs Addressed Funding Description Target Date Estimate the number and type of families that will benefit from the proposed activities Location Description Planned Activities Project Name	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds. 6/30/2024 N/A Citywide Coordinate meetings, share data, fund program activities jointly and address policy issues. HUD Section 108
	Target Area Goals Supported Needs Addressed Funding Description Target Date Estimate the number and type of families that will benefit from the proposed activities Location Description Planned Activities	Coordinated Access for Homelessness Adequate Housing & Services for Homeless/At Risk Continuum of Care: \$4,734,000 The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds. 6/30/2024 N/A Citywide Coordinate meetings, share data, fund program activities jointly and address policy issues.

	Needs Addressed	Improving Housing Affordability
	Needs Addressed	Improving Housing Affordability
		Improving Neighborhood Conditions
		Increase Home Repairs and Housing Preservation
		Econ Dev: Job Creation/Access and Business Asst.
		Provide and expand Public (Social) Services – 15%
		Improve Public Infrastructure for LMI Households
	Funding	Section 108: \$37,000,000
	Description	To provide Section 108 loan pool funding for specific projects.
	Target Date	6/30/2024
	Estimate the number and type of	N/A
	families that will benefit from the	
	proposed activities	
	Location Description	Citywide
	Planned Activities	The city will establish a Section 108 Loan Pool to bridge gap financing &
		enable borrowers to proceed with projects to create/retain jobs, increase
		affordable housing and advance equity/equitable development
		opportunities. Specific projects selected for the Section 108 Loan Pool
		funding will be identified through a rolling application process.
35	Project Name	Public Service Capacity Dollars
	Target Area	Citywide
	Goals Supported	Local Affordable housing capacity -public services
	Needs Addressed	Improve Housing Affordability
		Improve Neighborhood Conditions
		Econ Dev: Job Creation/Access and Business Asst.
		Provide and expand Public (Social) Services – 15%
	Funding	CDBG: \$179,998
	Description	Increase capacity of non-profit organizations to carry out eligible
		Community Development Block Grant (CDBG) activities and activities that
		address Public Services.
	Target Date	6/30/2024
	Estimate the number and type of	N/A
	families that will benefit from the	
	proposed activities	
	Location Description	Citywide
	Planned Activities	Capacity building for non-profit organizations and for activities that
	riainieu Activities	address Public Services.
36	Project Name	CDBG Project - TBD
30	Project Name	•
	Target Area	Citywide Diviness Requitment/Betentian Assistance
	Goals Supported	Business Recruitment/Retention Assistance
	Needs Addressed	Econ Dev: Job Creation/Access and Business Asst.
	Funding	CDBG: \$223,679

Description	CDBG program income and carryover funds will be allocated to a project
	or projects to be determined by the City.
Target Date	6/30/2024
Estimate the number and type of	N/A
families that will benefit from the	
proposed activities	
Location Description	Citywide
Planned Activities	To be determined.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

In general, some federally grant-funded activities, such as public services, economic development, and housing rehabilitation and new construction, are offered on a citywide basis to low- and moderate-income (LMI) individuals and households. As well, the COT has identified and mapped areas of the City where the LMI population is 51% or more. LMI 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 COT also uses geographic, place-based strategies to reach the goals in the Five-Year Consolidated plan.

Geographic Distribution

Target Area	Percentage of Funds
Junction/Englewood	1
Garfield /Starr/ Raymer	1
Citywide	68
Old South End NRSA	15
Englewood NRSA	15

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The redevelopment and stabilization of Toledo neighborhoods are still influenced by national economic conditions. When making investments for low- and moderate-income persons, minorities, retirees, and those with disabilities are given priority. Neighborhoods that were once vibrant are now plagued by issues such as an aged housing stock, an increase in abandoned and dilapidated structures that contribute to blight, and a lack of opportunities for economic development.

The Neighborhood Revitalization Strategy Areas (NRSAs) for the City of Toledo's Department of Housing and Community Development were approved by HUD in February 2023. The NRSAs' designated locations are in the Old South End and Englewood areas. The NRSA plan is available on the City's website at https://cdn.toledo.oh.gov/uploads/documents/Toledo-NRSA Final-Application-10-21-22.pdf

In accordance with HUD guidelines, the city will allocate at least 70% of its CDBG entitlement award for 2020–2024 to initiatives that directly assist people of low–to moderate–income status.

Discussion

Every project and action are intended to contribute to HUD's national goal of aiding low- to moderate-income families, individuals, and communities.

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

The COT makes affordable housing available through a variety of methods, including the use of CDBG, HOME, and ESG funding. The City will use monies to support affordable housing during the 2023 (49th) PY through rental and security deposit assistance, supportive services, the building of new units, the acquisition and rehabilitation of existing units, owner-occupied house maintenance, and permanent housing.

Furthermore, specific one-year affordable housing goals will satisfy the City's fair housing goals outlined in the Analysis of Impediments to Fair Housing Choice (AI). In the tables below, the project and program goals outlined in the Annual Action Plan are aimed at non-homeless, homeless, and special-needs households.

One Year Goals for the Number of Households to be Supported		
Homeless	104	
Non-Homeless	221	
Special-Needs	134	
Total	459	

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through		
Rental Assistance	104	
The Production of New Units	30	
Rehab of Existing Units	304	
Acquisition of Existing Units	21	
Total	459	

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The demand for safe and affordable housing units for extremely low-, very low-, and low-income families remains critical. The COT intends to continue exploring additional alternatives that address this need and will identify significant activities that will assist in reaching the City's high priority.

AP-60 Public Housing - 91.220(h)

Introduction

Lucas Metropolitan Housing (LMH) will conduct the following actions and activities:

STRATEGIES:

- 1. New Strategic Plan developed.
- 2. Portfolio Repositioning Strategy.
 - Create housing opportunities in existing high opportunity neighborhoods.
 - Improve neighborhood conditions to create mixed income communities of choice.
- 3. Establish Pathways to Self-Sufficiency.

ACTIONS:

- 1. New Strategic Plan developed.
 - a. Interview and/or survey employees, partners and community stakeholders to analyze the current environment at LMH.
 - b. Identify and analyze strategic issues.
 - c. Develop objectives and action plans.
 - d. Implement strategies.

Actions planned during the next year to address the needs to public housing

- 2. Portfolio Repositioning Strategy Two-Pronged Approach.
 - Create housing opportunities in existing high opportunity neighborhoods.
 - Improve neighborhood conditions to create mixed income communities of choice.
- a. LMH will transition Low Income Public Housing (LIPH) Portfolio to a subsidy platform other than LIPH, while keeping the units affordable at 30% of AGI and ensuring the fiscal health of the agency.
- b. LMH will Grow the number of apartment homes available through a combination of New Construction, Renovation, Acquisition, Project Based Vouchers, Project Based Rental Assistance, Housing Choice Vouchers, Low-Income Housing Tax Credits and by leveraging Rental Assistance Demonstration (RAD).
- c. Improve neighborhood conditions and create housing in high opportunity areas, leveraging on capital through public resources, corporate support and private investments.
- d. Transition to a flexible and reliable financial platform while maintaining and growing the supply of income-based affordable housing.
- 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.
- f. Close on the following initial projects investing \$200 million:
 - a. Park Apartments 45 apartments for Transition Age Youth (TAY) \$14 million investment.
 - b. Collingwood Green IV 40 townhomes mixed income individuals and families \$20 million investment.
 - c. Collingwood Green V 75 apartments for Seniors \$28 million investment.

- d. McClinton Nunn Homes Redevelopment (Choice Neighborhoods Initiative CNI) 379 apartments and 63 home-ownership Mixed income families and seniors \$108 million.
- e. Palmer Gardens 75 apartments mixed income families \$15 million investment.
- f. TenEyck Towers 154 apartments elderly disabled \$15 million.

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

- 3. Establish the first FOC under a Housing Authority in the State of Ohio to build families' and individuals' financial capability by offering them a suite of services:
 - a. Employment assistance, financial education & coaching, and access to income supports.
 - b. Through one-on-one coaching and education offered at trusted community-based organizations.
 - 1. Leverage LMH's Housing Choice Voucher Program to support families that are assisted under the housing choice voucher program to use their voucher to buy a home and receive monthly assistance in meeting homeownership expenses.
 - 2. All LMH homeownership and housing counseling will be completed by a HUD certified counselor working for a HUD-approved housing counseling agency. LMH's non-profit affiliate Lucas Housing Services Corporation will become a HUD Certified Counseling Agency in 2023.
 - 3. Increase the sources of financial assistance to families to make a home affordable and connecting families to resources to meet down payment and closing costs.
 - 4. Build stronger community connections with Financial Institutions and provide more outreach and education to participants so that families can access the funding needed for a loan.
 - 5. Strengthen partnership with LMH's non-profit affiliate Lucas Housing Services Corporation to increase the offer of sustainable and affordable homeownership opportunities.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not Applicable. The PHA is not designated as troubled.

AP-65 Homeless and Other Special Needs Activities – 91.220(i) Introduction

The Toledo Lucas County Homelessness Board (TLCHB), in partnership with the Continuum of Care (CoC) partners, including the City of Toledo, continues to coordinate local efforts to reduce and end homelessness. TLCHB maintains an organizational partnership with the regional housing authority, Lucas Metropolitan Housing (LMH), to achieve this mission more effectively in our community.

TLCHB's partnership with LMH has resulted in innovations in local homelessness service delivery, including the CoC's Housing First model, "No Barriers Housing", which incorporates U. S. Department of Housing and Urban Development (HUD) best practices into the CoC's services as well as housing populations prioritized by the strategic plan. In 2022, TLCHB and partners will formalize the system-wide model's processes and systems, including the Coordinated Entry (CE).

In addition, TLCHB and CoC partners have engaged in strategic planning to update and strengthen the COC, now formally entitled Home for Everyone, its governance structure, and the CoC Board. Home for Everyone includes traditional homeless and housing service providers as well as additional community partners from other provider systems that impact and serve homeless individuals (examples: the Lucas County Board of Commissioners, the City of Toledo Department of Housing and Community Development, the United Way of Greater Toledo 2-1-1, local schools, the Mental Health and Recovery Services Board, Lucas County Children's Services, physical health providers, mental health and Substance Use Disorder (SUD) providers, workforce providers, financial opportunity providers, etc.). TLCHB and CoC partners will continue to enhance the structure and functionality of Home for Everyone, deepen its work, and formalize its processes and outreach in 2023.

The TLCHB and its partners continue to utilize CE data to measure progress towards ending homelessness. In addition, TLCHB and its partners continue to utilize specialized case management and community outreach services for unsheltered homeless individuals through Neighborhood Properties, Inc.'s (NPI) Projects for Assistance in Transition from Homelessness (PATH) program. In 2021, TLCHB implemented the Housing Problem Solving (HPS) Program into the CE to address bottlenecks in housing referrals caused by the pandemic. The implementation of this program was a response to an urgent and increasing need in our community to provide rapid resolution, diversion, and homelessness prevention. The program model is designed to divert households with shorter histories of homelessness and less severe service needs away from entering the homelessness system by problem solving on the front end of Coordinated Entry, thus preserving limited emergency shelter and supportive housing resources for those with longer histories of homelessness and severe service needs. This program has been expanded to include dedicated eviction prevention activities through the use of Emergency Rental Assistance II funds.

The TLCHB and partners will be utilizing these new and existing structures to successfully implement this Action Plan's goals for homeless individuals and for other special needs activities. TLCHB continues to provide support and advocacy for agencies and organizations seeking to develop or acquire new supportive housing for populations experiencing chronic homelessness and/or more severe service needs, including Warren Commons, Park Apartments, and Whitney Manor.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

TLCHB and its CoC partners will continue to coordinate community outreach activities for individuals experiencing homelessness among various sectors, including education, mental health/substance use disorder, physical health, criminal justice and corrections, social services, housing, the workforce, and financial opportunity providers. Specialized attention will include coordinating directly with United Way of Greater Toledo's 2-1-1 for consistent assessment within the Coordinated Entry.

In addition, specialized case management services through the PATH program will be utilized for individuals experiencing unsheltered and/or chronic homelessness. PATH's Community Outreach Specialists are trained to identify and engage unsheltered and chronically homeless individuals and connect them to needed services and Coordinated Entry for housing options. In addition, the PATH program provides intensive, client-based, specialized case management services that lead to improved outcomes for this population. TLCHB has begun coordinating community planning to address youth homelessness with our community partners, with the objective of assessing and disrupting the generational impact of experiencing homelessness and the increasing rise in youth experiencing homelessness. Over 2023–2024, TLCHB will develop a youth action board and submit a community selection application on behalf of the jurisdiction through the 2023 Youth Homelessness Demonstration Program.

Addressing the emergency shelter and transitional housing needs of homeless persons

TLCHB and its CoC partners, utilizing the unified and comprehensive homelessness services delivery system-wide model of Housing First, will increase coordination and referrals to emergency shelter and transitional housing services for homeless individuals. TLCHB regularly coordinates with its Coordinated Entry and local emergency shelters and transitional houses to maximize resources and ensure efficient and effective coordination. Where there is limited capacity in CoC shelters, TLCHB has developed a coordinated hotel/motel program through Coordinated Entry. This program, born out of emergency pandemic needs, has continued to provide valuable emergency shelter services to vulnerable populations and will be continued through 2023-2024 in collaboration with the City of Toledo. TLCHB will also be assessing the needs of youth experiencing homelessness and the capacity of the CoC to address them in an adequate and appropriate way through the development of the Youth Action Board and an application to the Youth Homelessness Demonstration Program. TLCHB will be reviewing and updating all policies related to CE access points in 2023 with the goal of streamlining processes, eliminating gaps, and ensuring effective participation among all service providers.

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

TLCHB's organizational partnership with LMH, the utilization of the unified and comprehensive service delivery system-wide model of Housing First, and the continued use of the evidence-based tool Service Prioritization Decision Assistance Tool (SPDAT) will support implementation of this goal. TLCHB and CoC partners will give special assistance to chronically homeless persons and families, families with children, veterans and their families, and unaccompanied minors. This process, including both the use of the SPDAT tool and case conferencing, will be utilized by TLCHB and CoC partners to shorten the time individuals and families experience homelessness and get sheltered or into housing options. The SPDAT allows for coordinated assessment for prioritization and placement of clients in appropriate housing programs. This tool provides our community with a comprehensive method to assist homeless individuals and families with shelter placement and permanent housing referrals and placements. A continuous review of this tool will provide TLCHB and the CoC partners with the latest and most accurate approach to assessing homeless individuals and families based on their individualized needs.

Housing Problem Solving through Coordinated Entry is able to complement traditional housing programs for those with the most severe service needs to increase efficacy and efficiency by addressing barriers as well as working as a stand-alone resource available to all members of the community experiencing housing instability or homelessness who may not otherwise be able to access traditional housing resources, resulting in decreased time spent experiencing homelessness for both chronic and non-chronic populations.

With TLCHB's partnership with LMH, we will provide stronger service coordination in referrals to affordable housing, housing supports, and long-term housing assistance such as tenant and project-based vouchers. This partnership with LMH will both increase referrals to affordable housing programs and address evictions as an entry point for homelessness for individuals and families.

TLCHB also has a formal partnership with ABLE/LAWO to assist people in sealing past evictions that may be a barrier to permanent housing, as well as with the Fair Housing Center, which is also collaborating on evictions by developing a Landlord-Tenant Mediation Program to minimize and mitigate potential evictions within the system. TLCHB and LMH have established a joint Landlord Engagement Project (LEP) to work collaboratively within Lucas County's homelessness crisis response system to a) identify housing opportunities for households experiencing homelessness, both individuals and families; and b) coordinate with landlords and property managers to provide more immediate access to housing opportunities and promote housing stability for individuals and families with housing needs. The LEP seeks to create a collaborative partnership among landlords, property managers, participating human services agencies, and households experiencing homelessness or housing insecurity.

Additionally, in 2022, TLCHB began new partnerships with CoC partners to expand rental subsidies and assistance programs to maximize the number of individuals being transitioned into permanent housing. TLCHB has also given CoC priority status to two pending permanent supportive housing developments being proposed this year.

Homeless individuals and families in re-housing programs are connected to financial opportunity and wraparound service providers. Through the Housing First process, case managers will be assigned to individuals to support them after they move into new housing. They will provide referrals to mental health support services, physical health support services, furniture and other necessities, and paid services to prevent reentry into homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

TLCHB and its CoC partners will also use the unified and comprehensive homelessness services delivery system-wide model of Housing First to achieve this goal and the organizational partnership with LMH. Further, the broadening of the CoC will include more cross-sector and inclusive services within Home for Everyone, connecting non-homeless service providers and housing sectors more deeply to the CoC, which will assist us in achieving this goal.

Special attention for this goal will be paid to extremely low-income individuals and families, to those receiving assistance from CoC partners, and to individuals being discharged from publicly funded institutions and systems of care. These publicly funded institutions and systems of care include health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions. TLCHB began a formal partnership with Lucas County Children Services in 2022 to support transition-aged youth in this effort. TLCHB will also continue to partner with LMH on the Park Apartments. With construction scheduled to begin in 2023, the Park Apartments will offer 45 units of safe, permanent supportive housing to transition-aged youth (18–24 years old) with a certified disability. It will serve our community's most vulnerable youth experiencing homelessness. This population will benefit from a non-time-limited supportive housing approach with youth-centered services, a model previously unavailable in our community and a need demonstrated by local data. Lucas Housing Services Corporation/Lucas Metropolitan Housing, Harbor Behavioral Health, and the CoC will work together to provide true supportive housing, whereby property management works alongside a robust supportive services model to support all participants regardless of their needs or histories. The CoC will certify eligibility and make appropriate referrals to the program through the Coordinated Entry.

TLCHB will continue to collaborate with TASC of Northwest Ohio, Inc. on Warren Commons, a housing development that will offer 46 one-bedroom units of permanent supportive housing with a preference for individuals who are homeless and disabled by mental illness, substance abuse, dual diagnosis, and/or a physical disability.

Continuation and expansion of Housing Problem Solving activities at the front end of Coordinated Entry through United Way 2-1-1 will address households at greatest risk of becoming homeless by diverting people from traditional CE resources through problem solving conversations, referrals to community resources, and the limited use of flexible financial assistance to overcome one-time barriers. Toledo-Lucas County's Eviction Prevention Partnership, a collaborative partnership comprised of eleven local agencies and organizations dedicated to providing a holistic approach to eviction prevention, was developed through Emergency Rental Assistance II funds in April 2022 and has served over 100 households in its first six months of operation. Through these funds, TLCHB has created a full-time program coordinator position, increasing landlord recruitment through its ability to rapidly avoid eviction, provide financial assistance, and engage in one-on-one conversations with landlords and tenants. These conversations explain programmatic processes both within TLCHB and with other community resources, negotiate alternatives to legal evictions, refer to partners within the Eviction Prevention Partnership, and provide basic mediation and problem-solving between tenants and landlords.

Discussion

In the last two years, TLCHB and the CoC have undergone several instrumental and innovative organizational and system delivery changes, including the development and implementation of No Barriers Housing, which is a systemwide framework to ground our service delivery model in the philosophy and principles of Housing First. The goal of No Barriers Housing is to end chronic homelessness in Lucas County and build a service delivery model to ensure all experiences of homelessness are rare, brief, and non-recurring.

TLCHB has developed and continuously coordinates a Race Equity Access Committee to address the overrepresentation of the Black community in the numbers of those experiencing homelessness and the unsheltered population as compared to the numbers the Black community represents in the community census, the LGBTQ community population that is experiencing homelessness due to gender or sexual orientation discrimination, and other factors that contribute to an increased risk of experiencing homelessness such as age, ethnicity, or language barriers. It has implemented many changes, rebuilt programs and capacity, and worked to remain the leader in support of eliminating homelessness in our community. TLCHB has been in direct partnership with LMH to establish the Park Apartments, which will house youth ages 18–24 who need long-term supportive housing. TLCHB has and will continue to act on behalf of all homeless service providers to provide up-to-date, responsive leadership to address the ongoing COVID pandemic.

TLCHB will continue to lead the community in ensuring that Housing First principles, equitable practices, and culturally appropriate and trauma-informed service delivery models are implemented in all programs; continue to expand and deepen partnerships; and update key performance indicators to further drive and predict trends to better serve this population. These goals are achievable, and we look forward to improving outcomes for homeless individuals and families, or those at risk of becoming homeless, in the coming year.

AP-75 Barriers to affordable housing – 91.220(j) Introduction:

Jurisdictions that receive federal dollars, directly or indirectly, are required by the Department of Housing and Urban Development to complete an Analysis of Impediments (AI). The Analysis of Impediments process is prescribed and monitored by the U. S. Department of Housing and Urban Development and the State of Ohio's Department of Development. Specifically, to receive HUD Community Planning and Development formula grants, a jurisdiction must (i) certify its commitment to actively further fair housing choice; (ii) maintain fair housing records; and (iii) conduct an Analysis of Impediments to Fair Housing Choice.

An AI is a comprehensive review of barriers that inhibit residents from acquiring the housing of their choice based on federal, state, and local characteristics: race, color, national origin, religion, sex, familial status, disability, military status, sexual orientation, gender identity, immigration status, and source of income. The examination looks at issues in our community through a fair housing lens, including community characteristics and demographics; income and poverty; transportation; employment; and public and private policies that impact protected groups and vulnerable populations, such as zoning, code enforcement, and real estate practices, among others.

The Fair Housing Center conducted an Analysis of Impediments to identify the fair housing barriers that is addressed in the 2020-2024 Consolidated Plan. Emerging, persisting, and worsening impediments discussed in this document include the continuing effects of redlining and other forms of systemic discrimination; the indicators of low opportunity and health risks in neighborhoods of color; and the corresponding lack of housing mobility among occupants in neighborhoods of color. Other significant housing concerns are also illustrated, such as lead hazards, barriers faced by persons re-entering the community after incarceration, and the emerging issue of discrimination based on source of income. The text also calls for affirmative programming and counseling to improve and inform housing choices and highlights the need for legislative changes to ensure the effectiveness of this programming.

Actions it planned 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

I. Housing Opportunity

Criminal History Screening

- Adopt local policies to reduce criminal history screening
 - City of Toledo, The Fair Housing Center
- Set aside affordable housing for re-entry population
 - O Lucas Metropolitan Housing, Other subsidized housing providers
- Ensure compliance with HUD's guidance on criminal history screening
 - City of Toledo, The Fair Housing Center

Homeownership: Lending and Insurance

- Encourage lenders to provide credit opportunities in minority and low-income neighborhoods
 - The Fair Housing Center with support from the City of Toledo
- Address insurance discrimination issues
 - o The Fair Housing Center with support from the City of Toledo
- Coordinate with local banks to create loan product for low-income and minority neighborhoods
 - The Fair Housing Center with support from the City of Toledo

Accessibility for Persons with Disabilities

- Enforce current visit-ability and accessibility rules
 - City of Toledo, The Fair Housing Center
- Encourage developers to increase accessibility where they receive public funds or tax incentives
 - o City of Toledo

Source of Income Discrimination

- Aggressively enforce local source of income discrimination laws
 - City of Toledo
- Coordinate with Lucas Metropolitan Housing and landlords to address issues with vouchers

Enforce Fair Housing Protections

- Conduct investigations in response to allegations of housing discrimination, file complaints and/or lawsuits where appropriate
 - o The Fair Housing Center with support from the City of Toledo

Increase awareness of fair housing rights and responsibilities

- Engage in education and outreach activities including trainings, presentations, advertisements, distributing educational materials, participating in outreach events, and posting content on social media
 - o The Fair Housing Center with support from the City of Toledo

Voucher Mobility

- LMH should adopt policies consistent with the Poverty Race Research Action Council's recommendations
 - Lucas Metropolitan Housing

Land Use and Zoning

- Adopt changes to policies and practices to address the identified impediments, such as restrictions on the development of group homes for persons with disabilities
 - o City of Toledo with support from The Fair Housing Center
- The City of Toledo should pass local law that removes zoning restrictions for group homes consistent with the recommendations of The Fair Housing Center

LGBTQIA+

- Adopt changes to policies to address the identified impediments
 - City of Toledo with support from The Fair Housing Center
- As with source of income discrimination law discussed above, the City of Toledo should ensure
 aggressive enforcement of the local anti-discrimination law that prohibits discrimination based on
 gender identity and sexual orientation

Homelessness and affordable housing

- Coordinate with partners to create affordable housing opportunities and move forward with the Housing First Initiative
 - o City of Toledo

II. Housing Stability

Housing Conditions

- Adopt changes to policies to address the identified impediments
 - City of Toledo with support from The Fair Housing Center and other community partners
 - o City of Toledo must ensure aggressive enforcement of local lead poisoning prevention law

Public Transportation

- Lead efforts to adopt and expand county-wide transportation services. Ensure that persons with disabilities have access to paratransit county wide
 - City of Toledo with support from other local governments and other agencies

Impediments in Rental Housing

- Address the eviction crisis in Toledo. Increase funding for the legal defense of evictions and programs that prevent evictions from being filed
 - The City of Toledo with support from other local governments and other agencies

Access to water services

- Ensure the City's water meter replacement program does not cause water services to be terminated in a
 manner that disparately impacts protected classes under the Fair Housing Amendments Act, and ensure
 that persons with disabilities can request accommodations to avoid the termination of water services as
 needed. Enforce prohibition on exploitive resale of water services by housing providers
 - The City of Toledo with support from other local governments and other agencies

Discussion:

Homelessness disparately impacts minority residents. However, opportunities are available to build new affordable housing to reduce homelessness as an impediment to fair housing.

Directing more discretionary resources toward affordable housing

Discretionary funding sources, such as HOME and CDBG, should be evaluated to determine if a larger portion of those funds can be directed toward the development of affordable housing in the Toledo area.

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The development of new housing resources must be cognizant of whether the location of the development will truly provide for access to transportation and other resources necessary to help the residents succeed.

Supporting the new Housing First "No Barriers Housing" Initiative

A Housing First initiative is moving forward in the Toledo area. Public policy and available public resources should be directed to support this effort.

As mentioned above, the City of Toledo has adopted local source of income discrimination laws and other measures in its local anti-discrimination law. However, currently, this law is not being enforced. It is important that the City develop systems and processes to pursue enforcement of this local law.

Currently, the City is considering changes to local zoning laws to remove barriers to the development of group homes for persons with disabilities. However, this law is currently pending in a City Council committee after some residents expressed opposition. It is important that the City follow through with removing barriers to fair housing choice by adopting the changes to the zoning code that fair housing advocates have requested.

Also related to zoning, on pages 109 through 110 of the Analysis of Impediments to Fair Housing Choice (AI), the AI strongly suggests that the City pay close attention to the development of plans created by local residents to ensure that neighborhood development occurs in a manner with which they are comfortable. As the City works on the development of its neighborhoods, it should be mindful of this issue. The City's zoning officials, for example, should ensure that developments are consistent with adopted neighborhood plans.

Enforcement of the City of Toledo's local lead poisoning prevention law is extremely important to address housing condition issues. Housing conditions are identified as an important impediment to fair housing choice in Toledo. Moving forward, the City should ensure that an appropriate level of resources and staffing is dedicated to the implementation of the law, and this should be monitored closely.

AP-85 Other Actions – 91.220(k)

Introduction:

Through the management of programs and cooperation with its community partners, the City of Toledo is dedicated to addressing the needs of the underprivileged. The city aims to help the underserved by building and preserving affordable housing, minimizing lead-based paint dangers, and lowering the number of families living in poverty through the services provided by community partners and other regional organizations.

The City will keep looking for opportunities to establish alliances with all facets of the local community. The DHCD increases understanding of community agencies and resources through the mandated quarterly trainings provided to CDBG and ESG-funded agencies. Speakers from neighborhood organizations are also asked to address the City's partners and share their knowledge and experiences. In order to promote better coordination of community services and efforts, networking and information sharing are encouraged.

Actions planned to address obstacles to meeting underserved needs

The CDBG, HOME, and ESG monies are used by the COT, non-profit organizations, quasi-government organizations, and other local agencies to support programs and/or services that fulfill the needs of Toledo's underserved populations.

The City of Toledo, like other cities across the U.S., continues to face challenges with a strong contractor pool to serve the needs of its construction and rehabilitation pipeline funded with HOME. This is particularly true with owner-occupied rehabilitation activities.

There is an ongoing effort to expand the contractor pool and partner with other local agencies to deliver expedited assistance to LMI households. This includes an open bid process and the publication of contractor opportunities with the COT via local publications and social media. Engagement with local contractors has been a priority for the Department of Housing and Community Development as well.

The awarding of tax credits from the Ohio Housing Finance Agency (OHFA) to developers building in Toledo, Lucas County, has been a challenge due to the lack of awards provided to development in Toledo. Of the applicants that responded to the Affordable Rental and Supportive Housing NOFA issued in December 2021 and issued a conditional commitment letter, only one was successful in securing tax credits. The remaining developers that received a conditional commitment letter requested and were approved for an extension to allow them to reapply for the 4% tax credit pool. The 4% tax credits will be announced by June 30, 2023. COT will engage OHFA to discuss a scoring mechanism that is more equitable when considering mid-sized cities in Ohio.

Through collaboration with the Fair Housing Center (TFHC), a 2020 Analysis of Impediments (AI) was finished. The AI's Fair Housing Plan outlines actions that will be taken to remove barriers to fair housing. The COT and TFHC will work together, in conjunction with other local partners, to carry out the actions indicated in the Fair Housing Plan.

Actions planned to foster and maintain affordable housing

The COT will use various initiatives, as well as HOME, HOME-ARP, ARPA, ERA, and CDBG funds, to maintain and foster affordable housing. The goals identified in the Strategic Plan and the Action Plan include the construction and acquisition of affordable homes, rehabilitation of existing housing stock, home-buyer assistance, home repair programs for the elderly and disabled, emergency rental assistance, and housing services for non-homeless special needs populations. The goals of the Annual Action Plan also included funding to increase the capacity of local non-profit community development corporations to develop affordable housing and/or attract larger for-profit developers to develop low-income housing tax credit rental units.

The COT will also work with partners and policymakers to increase rental housing through HOME-ARP funding by providing GAP financing for 9% and 4% tax credits. The COT engaged Root Policy to develop the HOME-ARP Allocation Plan, which included contributions from key stakeholders in the city and county. The COT was notified by HUD on February 15, 2023, that its HOME-ARP Allocation Plan had been reviewed and approved. The deployment of the HOME-ARP funds will continue to support one of the housing strategy goals, which is to increase access to affordable housing opportunities within the city via new construction and/or rehabilitation of single- and multi-family units.

Also, the COT remains an active member of the Year 16 Initiative, which seeks to preserve the affordability of over 700 single-family low-income housing tax credit-financed units, working along with local PHAs, lenders, and intermediaries. The COT plans to work with a local university to determine the level of foreclosures, including foreclosed homes and those at risk of foreclosure. The data will be used to determine the need for a foreclosure counseling program during the Consolidated Plan period.

Actions planned to reduce lead-based paint hazards

The City of Toledo (COT) continues its commitment to providing lead-safe, decent, safe, and sanitary housing for eligible families. This effort uses a highly coordinated network consisting of private health officials, community development corporations, the local public housing authority, social service agencies, and other city departments. The effort targets central city neighborhoods, where low-income families occupy approximately two of every three residential units, and the concentration of pre-1978 structures containing lead paint is estimated to exceed 80 percent.

The Department of Housing and Community Development (DHCD) administers a Lead-Based Paint Hazard Control Grant program (OHLHD0453-20) received from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH). The \$5.7 million grant is utilized to provide financial assistance to property owners to help control lead paint hazards in both owner-occupied and rental residential units within the City of Toledo. The initial 42-month period of performance for the grant began on April 1, 2021, and concludes on June 30, 2024. In order to maximize all funding from OHLHD0453-20 and complete as many units as possible, it is anticipated that the DHCD will request a no-cost extension of the period of performance to twelve (12) months beyond the original expiration date of June 30, 2025.

Over the life of OHLHD0453-20, a 42-month grant period, the DHCD has proposed to complete 175 lead inspection risk assessments and make 175 residential units in the City of Toledo lead-safe. The DHCD has benchmarked the completion of 60 lead inspection risk assessments and 69 residential units made lead safe under OHLHB0636-20 during the 2023–2024 Action Plan (July 1, 2023–June 30, 2024).

The DHCD also received funding through a 3-year contract with the local health department to utilize BP-Husky settlement funds to make 40 units lead-safe. The contract began on May 1, 2021, and was to continue up to March 25, 2023; however, a two-year extension was granted with a period ending on March 25, 2025. It is anticipated that approximately 25 additional units funded through this source will be made lead-safe during the stated action plan period.

Additional multi-year funding was received from the OLHCHH to pilot a cooperation demonstration between the city's lead hazard reduction grant programs and the NeighborWorks weatherization program. The award provided \$1,000,000 to make 40 units lead-safe, along with air quality restoration. The period of performance runs from 07/29/2021 to 07/28/2024. It is anticipated that 25 lead inspection risk assessments will be performed and 30 residential units will be made lead-safe under this grant during the 2023–2024 Action Plan year.

Lead-based paint hazard control methods for all of the DHCD's lead programs include the utilization of low-level interventions, interim controls, and partial component abatement. Abatement is the DHCD's preferred method for addressing painted surfaces. The program does not perform full abatement but rather replaces specific components and systems. Units are lead-safe but not lead-free.

Actions planned to reduce the number of poverty-level families

The consolidated plan's and this action plan's objectives are to decrease Toledo's population of low-income individuals or families. Low-income residents and families can access housing and community development initiatives through the Department of Housing and Community Development. The following benefits of housing initiatives are intended for households: economic development, family stability, health improvement, homeownership, and community development.

Actions planned to develop institutional structure

The Department of Housing and Community Development recognizes the necessity of maintaining a high level of cooperation while working on projects with other City departments and/or groups. It is in charge of all aspects of the HUD grant programs. This collaboration assures the greatest possible results and the most efficient use of resources.

The COT will continue to coordinate activities with partners such as:

- 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 Reutilization Corporation (Land Bank)
- Toledo Lucas County Health Department
- Toledo Lucas County Port Authority

Each of Toledo's partners brings a unique service element and level of expertise. To achieve the desired community outcomes, it is essential to maintain these partnerships and collaborations. There are numerous connections between the corporate community, religious institutions, government agencies, housing providers, foundations, and other neighborhood groups that support the underprivileged. There will be more communication with all community stakeholders.

Actions planned to enhance coordination between public and private housing and social service agencies

The COT will continue to collaborate with a wide range of governmental, private, faith-based, and community organizations in order to assess the needs of its citizens. The City will continue to work with the CoC and the community to streamline the actions of public service agencies in order to improve the lives of all Toledo residents. These groups work on a variety of family issues, including homelessness, workforce development, and community health.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4) Introduction:

The COT uses CDBG and HOME funds in support for a variety of housing and community development needs and services. ESG is used for shelter operations, homelessness prevention, and rapid rehousing. This section shows information on program specific requirements for the Community Development Block Grant, HOME and Emergency Solutions Grant (ESG) programs.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next	
program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to	
address the priority needs and specific objectives identified in the grantee's strategic plan.	12,316,000
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has	
not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	12,316,000

Other CDBG Requirements

1. The amount of urgent need activities

0

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

80.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The COT does not utilize any other forms of investment other than those noted in CFR 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture Provision

The COT uses the Recapture Provision to ensure affordability for all homebuyer programs when a Direct Subsidy is provided to the homebuyer to purchase the property. A Direct Subsidy includes a down payment, closing costs, and other assistance to the homebuyer that reduces the purchase price from the fair market value to an affordable price.

If the homebuyer desires to sell the house and notifies the City within the affordability period, based on the Direct Subsidy provided to the homebuyer, the City will use recapture provisions to mitigate noncompliance based on the prorated recapture formula below. The amount recaptured by the City cannot exceed what is available from net proceeds. Net proceeds are defined as the sales price minus superior loan repayments (other than HOME funds) and any closing costs.

Recapture Formula

To determine the pro-rata amount recaptured by the City:

- Divide the number of months the homebuyer occupied the home by the affordability period (in months), and;
- Multiply the resulting figure by the total amount of direct HOME subsidy originally provided to the homebuyer.

NOTE: Development Gap Subsidies (i.e., the difference between the cost of producing the unit and the fair market value of the unit) are not subject to recapture as the homebuyer does not realize a direct benefit from these funds.

Resale Provision

For properties that receive HOME development subsidies only, and there is no Direct Assistance to the homebuyer, the resale requirements below will apply if the home is sold during the affordability period:

- The new purchaser must be a low-income household with income at or below 80% AMI.
- The household income must be verified by the City. Income verification process and contact information is included in the Homebuyer Written Agreement.

- The property must be the family's principal residence and the new purchaser agrees to assume the remainder of the original affordability period.
- Fair return will be measured by the percentage change in the Consumer Price Index over the ownership period.
- The original homebuyer, now the home seller, must receive a "Fair Return" on investment, as defined by the City.
- The basis for calculating fair return will include a return on 1) the HOME-assisted buyer's original investment, plus 2) capital improvements made by the original buyer based on actual costs of improvements as documented by homeowner's receipts.
- The improvements include window and roof replacements; electrical and plumbing system upgrades; infrastructure improvements; kitchen and bathroom remodels; basement finishing and energy efficient upgrades.
- In some instances, it may be necessary for the City to provide HOME assistance to the subsequent purchaser to ensure that the original buyer receives a fair return and the unit is affordable to the low-income population, as defined.
- The Homebuyer Agreement must also include a provision of first right of refusal for the City to purchase the affordable unit if an eligible buyer cannot be found in a reasonable time frame.

To maintain the continued affordability of the property throughout its affordability period, the City will ensure the home is affordable to LMI homebuyers at the time of resale. The targeted population of such buyers will include households with incomes of 60%-80% AMI paying no more than 30% of gross income for principal, interest, property taxes, homeownership association dues, and insurance. If the price that provides a fair return to the initial homebuyer is too high to be affordable for the subsequent LMI buyer to purchase the property, the City at its sole discretion, may provide HOME assistance as a direct subsidy to the subsequent buyer, thereby imposing a new affordability period and subjecting the assistance to the recapture provision.

- 3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:
 - The City enforces the recapture provision with a Homebuyer Agreement and Restrictive Covenant recorded in the land records of the City of Toledo.
 - The City enforces the resale provision with a Homebuyer Agreement and Restrictive Covenant recorded in the land records of the City of Toledo.

Foreclosure

As provided in 24 CFR Part 92.254(a)(5)(i)(A), "affordability restrictions may terminate upon occurrence of any of the following termination events: foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD. The City may use purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure to preserve affordability. The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the termination event, obtains an ownership interest in the housing."

4	Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehability with HOME funds along with a description of the refinancing guidelines required that will be used und CFR 92.206(b), are as follows:		
	HOME funds will not be used to refinance existing debt secured by multifamily housing.		
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Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Written standards are contained within the four documents listed below:

- OH-501 Toledo/Lucas County CoC Written Standards
- Coordinated Entry Referral Process
- Collaborative Governance of Coordinated Assessment
- Centralized Approach to Coordinated Access/Entry

See ESG Attachments for these documents.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The TLCHB, the local CoC governance body, in collaboration with the COT DHCD and based on community support, adopted a centralized approach for coordinated entry in August 2012 as its comprehensive collaborative delivery system for all publicly funded homeless services.

Coordinated Entry (CE) was implemented across the community, with various functions staged at logical and physical points. United Way of Great Toledo's 2-1-1 program hosts the CE project, which is the coordinated entry point for all persons entering the homeless system. The CE performs both prevention and diversion and, when necessary, refers to emergency shelters and/or outreach workers. It should be noted that emergency shelters do not turn away walk-ins or simply refer them to the CE, but engage them in an initial screening to find a brief resolution (diversion) that does not result in an emergency stay if possible. If diversion does not exist, the shelter will provide accommodations for the household to connect to CE by phone until subsequent next steps (which may or may not include assignment to the particular agency) are identified.

Emergency shelters, outreach workers, and other trained individuals are performing the housing assessment, which as of 2014, is the Service Prioritization Decision Assistance Tool (SPDAT). It helps identify which clients should receive what type of housing assistance intervention and assists in determining the intensity of case management services. The TLCHB upgraded to the latest updated version of SPDAT in 2017.

The SPDAT score, along with case manager recommendations and other factors, will be taken into consideration when forwarded to the referral specialist, who is currently the Executive Director at TLCHB. The information is used to create a prioritization list, also called the community list, which is used to make referrals to permanent housing projects (rapid re-housing and permanent supportive housing).

The governance of our CE system has multiple facets. The "Coordinated Assessment Collaborative Governance Policy" outlines the procedural aspects of monitoring the CE system. The members of the

Continuum of Care (CoC) play an integral role in this process. Participation in the CoC via the Community Advisory Council is agreed to as formal membership, with all publicly-funded organizations required to participate; we encourage and have cultivated a wide array of non-funded community members that participate as an elective. Assessment and assignment of Rapid Re-Housing Stabilization Services and short-term direct financial assistance were initiated through this approach as a direct result of the success of the Homeless Prevention and Rapid Re-Housing Program (HPRP). Shelters, Rapid Re-Housing Stabilization Services, and medium-term direct financial assistance joined in February 2013. Transitional and Permanent Supportive Housing were added in Spring 2013. Connecting households who are experiencing homelessness to a single, centralized point for screening and assessment/assignment for diversion, homelessness prevention, and re-housing services was deemed the "best fit" for the Toledo community because of the results evidenced through the HPRP.

Through the Community Advisory Council, comprised of all funded homeless service providers and members of the TLCHB, United Way of Greater Toledo, and the DHCD, as well as other community organizations with tangential goals and services, participants have the opportunity and responsibility to include the design and evaluation of CE and provide feedback on the cases being referred to them.

If, for any reason, a provider determines that a referred case is ineligible or inappropriate for their programs, CE and that provider work jointly to make a more appropriate referral. Due to local community needs and limited funding, the COT and the TLCHB do not fund homelessness prevention activities at this time.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The TLCHB, in partnership with the DHCD, established a timeline that included the following:

- A Citizens Review Committee (CRC) comprised of community representatives is identified, recruited, trained, and engaged in determining application priorities, processes, scoring, and selection.
- A mandatory application training and distribution meeting that is widely publicized, including direct invitations to current grantees and providers within the Toledo Area Alliance to End Homelessness (TAAEH).
- Completed applications are submitted in a timely fashion and are reviewed, ranked, and recommended (or not) for funding.
- The TLCHB Board of Directors votes on funding recommendations to be submitted to the DHCD.
 Recommendations are vetted and reviewed by the TLCHB and the DHCD for final selection and recommendations to the Mayor of Toledo and the City Council.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

A written obligation within third-party contracts with TLCHB and the DHCD provides guidance to achieve this expectation and is monitored by both TLCHB and the DHCD. TLCHB will meet this obligation either through a board appointment from the COT or as an elected director. Recommendations and/or nominations from the constituency are preferred. The nature of TLCHB CoC/ESG planning oversight work gives ample opportunity to engage those experiencing homelessness and/or those who have recently experienced homelessness toward the end of involving them in decision-making processes, including serving on standing committees and focus groups. ESG-funded agencies are required to have a formerly homeless representative on their boards.

5. Describe performance standards for evaluating ESG.

The local CoC established revised performance standards for funded agencies in September 2022. Not all program types have recommended targets for each performance indicator. Some program types have recommended targets for special populations instead of, or in addition to, overall targets. This is in concert with HUD's Interim Rule, which calls for "performance targets appropriate for population and program type." Targets are segmented according to the National Alliance to End Homelessness Rapid Re-Housing Triage Tool, which rates three areas of barriers to gaining and obtaining housing. Recommended targets are listed by program type for each indicator in the Key Performance Indicator list.

The performance indicators are consistent, regardless of funding sources. Standards established by the TLCHB for emergency shelter, transitional housing, homeless prevention, and rapid re-housing activities are applicable to evaluating ESG activities.

In the Integrated Disbursement and Information System (IDIS), HUD's computerized reporting system, the performance objectives and outcomes are already predetermined based on the activity type or category. Each category has subcategories in IDIS. The grantee may not choose their performance objectives and outcomes; applicable objectives and outcomes as established in IDIS are as follows:

HESG Activity Category	Performance Objective	Performance Outcomes
Prevention	Provide Decent Affordable Housing	Affordability
HMIS	N/A	N/A
Rapid Re-Housing	Provide Decent Affordable Housing	Affordability
Administration	N/A	N/A
Shelter	Create Suitable Living Environment	Availability/Accessibility

The COT is not funding street outreach activities through its ESG funds. Please refer to AP-65 of this action plan for existing outreach and assessment activities in the COT.



Attachments



Citizen Participation

1st VIRTUAL PUBLIC HEARING SUMMARY

DRAFT 2023-2024 ONE-YEAR ACTION PLAN Thursday, March 23, 2023, 5:30 p.m.

A public notice was posted on electronic media and published in local newspapers announcing the virtual public hearing. Due to the COVID-19 Pandemic, the public hearing was held virtually and was accessible to the public through live streaming. Those attending were given the opportunity to ask questions and provide comments.

Bonita Bonds, Commissioner of Administrative Services, City of Toledo, Department of Housing and Community Development (DHCD), began by welcoming everyone to the 1st Draft 2023-2024 One-Year Action Plan public hearing. Commissioner Bonds reminded everyone that the public hearing was being recorded and the recording would be submitted to the U.S. Department of Housing and Urban Development (HUD) as a requirement of the City's planning process. She stated that the City's planning process starts much earlier than its fiscal year, which runs from July to June.

Before getting started, Commissioner Bonds stated that Rosalyn Clemens, Director, City of Toledo, DHCD, was unable to attend the public hearing. Commissioner Bonds then proceeded in introducing those joining her at the public hearing, which included Monica Brown, Community Planning and Development Grants Manager, City of Toledo, DHCD; Jerry Culkowski, Lead Grant Manager, City of Toledo, DHCD (in place of Tiffanie McNair, Housing Commissioner); and Coleena Ali, Tenant Services Manager, City of Toledo, DHCD. She added that representatives from other partner agencies would also be speaking at the public hearing.

Commissioner Bonds explained that the City of Toledo is required by HUD to provide a Consolidated Plan, which is a five-year strategic plan that spells out what the City plans on doing during the next five years. The current plan runs from 2020-2024. The plan includes the City's priorities for the next five years and the goals for those priorities as to how it will utilize the federal funding. Every year within those five years, the City is required to provide an Annual Action Plan to HUD. That Plan tells HUD what the City plans to do for that particular program year within the five-year strategic plan. The City tells HUD how it will use the award funds received, and then provides them with a plan letting them know how the funds will be allocated and the priorities and goals it will meet for that particular year.

Commissioner Bonds explained that the City receives HUD funds on an annual basis and, as long as the City continues to be compliant and do what they're supposed to, it doesn't have to apply for those funds. The City is an entitlement city and, based on it being an entitlement city and agreeing to participate, it is automatically allocated those funds. From the 2020-2024 Consolidated Plan, there were nine priorities developed based on surveys, a steering committee made up of community development representatives, organizations throughout the city, and focus groups. From this, the City was able to develop the following priorities, which are ranked in the order of priority: 1) To improve housing affordability; 2) To improve neighborhood conditions; 3) To increase home repairs and housing preservation; 4) Economic development through job creation, and/or retention, access, and business assistance; 5) To provide adequate housing and services for the homeless population and at-risk families or individuals; 6) To provide adequate housing and services for other special-needs populations that do not fit the homelessness category; 7) To provide and expand public services and social services including food banks, youth activities, and medical services; 8) Fair housing - the City is required to affirmatively affirm fair housing and the Toledo Fair Housing Center assists with this priority; and 9) To improve public infrastructure for low- to moderate-income neighborhoods and areas.

Commissioner Bonds provided an overview of the outcomes and objectives. She explained that throughout the Five-Year Consolidated Plan, the City continues to actively pursue initiatives and

activities that address the HUD National Objectives. Every activity that it funds must meet a HUD National Objective. The first National Objective is to benefit low- to moderate-income individuals, families, households, and areas; the second National Objective is to eliminate slum and blight in the community; and the third National Objective is to address an urgent need, such as a hurricane or other disaster. Everything the City does must benefit one of those National Objectives. All of the goals established in the Action Plan must also address one of HUD's objectives including suitable living environment, decent housing, and economic opportunity. Everything the City does addresses one of those objectives. For Outcomes, the City wants to improve availability/accessibility, improve affordability, and improve sustainability.

Commissioner Bonds then spoke about the evaluation of past performance, which occurs in September of every program year. Once the Action Plan has been submitted to HUD telling them how the City will spend their funds, it has to provide them with a report that tells them what has been accomplished with those funds. That report is called the Consolidated Annual Performance and Evaluation Report (CAPER). This report tells HUD what the City has actually accomplished for the program year. It also tells HUD whether the City stayed within certain CAPs and if it adhered to all of the other regulatory items that it's supposed to adhere to financially. The City prepares this report on an annual basis. This report includes CDBG, the City's homelessness initiative, along with HOME dollars which the City typically provides for down-payment assistance, Tenant-Based Rental Assistance (TBRA), rehabilitation to owner-occupied and rental housing units, and special projects for multi-family and scattered-site housing.

Monica Brown, Community Planning and Development Grants Manager, City of Toledo, DHCD, provided an overview of the application process and timeline. Ms. Brown explained that the process began on Friday, January 13, 2023 when the City allowed the Non-Homeless and Homeless Service Providers to pick up their application packet. On Wednesday, January 25, 2023, the City held an open-office session where new applicants could come to the DHCD office and ask questions regarding their application. This session was offered to new applicants only. On Thursday, January 26, 2023, an application review session was held with the Non-Homeless Service Providers on Friday, January 27, 2023, an application review session was held for the Homeless Service Providers. On Friday, February 10, 2023, all Non-Homeless and Homeless Service Provider applications were due to the City by 4:45 p.m. Today, Thursday, March 23, 2023, is the first public hearing on the Draft 2023-2024 One-Year Action Plan, and the second public hearing will be held on Thursday, March 30, 2023, at 5:30 p.m. via Zoom. On Tuesday, April 11, 2023, at 2:00 p.m., legislation is scheduled to go before City Council for first reading in City Council Chambers. On Tuesday, April 18, 2023, at 4:00 p.m., the legislation is scheduled to go before City Council for second reading and possible passage. The final 2023-2024 One-Year Action Plan is due to HUD no later than Wednesday, May 17, 2023.

Ms. Brown explained that the City's Citizen Review process is a comprehensive approach to citizen participation and is detailed in the City's Citizen Participation Plan. In development of the 2023-2024 Action Plan, the City consulted with local organizations engaged in housing, community, and economic development. There is a 30-day comment period on the Draft Action Plan, which started on Wednesday, March 22, 2023, and there will be two public hearings. The first public hearing is today, Thursday, March 23, 2023, and the second public hearing is scheduled on Thursday, March 30, 2023, both at 5:30 p.m. via Zoom. Public hearings and the 30-day comment period were promoted through a media campaign including public notices, press releases, website postings, Facebook postings, and emails to City of Toledo's current community partner organizations. The City also ensures that the public hearings are held in facilities that are accessible for disabled individuals and, if held virtually, any necessary services are provided upon request. During the application process, the City utilized two Citizen Review Committees (CRC). These committees were established to review and evaluate the proposed funding requests. One committee evaluated the Non-Homeless Service Providers and the other evaluated the Homeless Service Providers. Members of both CRCs represented various

community sectors including banking institutions, religious institutions, healthcare providers, Toledo/Lucas County Public Library, financial sector, economic development, and social service agencies.

The minimum application requirements for Homeless and Non-Homeless Service Providers included the following: 1) Non-Profits - 501(c)(3) and in operation for at least two years, 2) Government agencies (Government entities/Quasi-Government agencies - not-for-profit), 3) Other Non-Profits - 501(c)(3) and in operation for at least two years, 4) Homeless Service Providers, and 5) Agencies that have demonstrated capacity to implement proposed activities or projects.

Commissioner Bonds provided a summary of the 2023 applicant funding requests received for Homeless and Non-Homeless Service Providers. For CDBG, the City received 28 applications for Non-Homeless Service Providers, with requests totaling \$3.1M. For HOME, the City received four applications for multifamily rental property development with requests totaling about \$1.7M. For ESG, which is the funding source for the City's Homeless Service Providers, the request totaled about \$934,000. Commissioner Bonds indicated that HOME was still in the beginning stages so this information may change.

Before presenting an overview of the 2023 resources, Commissioner Bonds reiterated that the numbers being presented were estimates in terms of what the City was looking at for carryover. She stated that this was the draft Action Plan and the City was still compiling information and pulling numbers to see what it will actually have. For the 2023 Program Year, which starts July 1st, the City's CDBG allocation will be \$7.355M, and in carryover so far, will have a little over \$450,000 for a total of \$7.8M available. The City's 2023 CDBG allocation is about an \$18,000 decrease from the 2022 Program Year. For HOME, the City will receive about \$2.551M, and in carryover, will have about \$1.357M. The City will also have an additional allocation, called HOME-ARP. Commissioner Bonds indicated that back in 2020 when the COVID-19 Pandemic started, the City received CDBG- and ESG-COVID funds in the community and that the HOME-ARP funds were like HOME-COVID funds. For HOME-ARP, the City will be allocated about \$7.9M. A small percentage of those HOME-ARP funds were provided to the City initially in order to get the planning started and, like other communities, the City hired consultants to help put that plan together. So the \$7.8M is the balance of the total \$7.9M that the City will receive. The City's total resources for HOME will be about \$11.781M including the carryover. The City's 2023 allocations for ESG and HOME are increases from what it received in the 2022 Program Year. For ESG, the City will receive a little over \$648,000 to address homelessness, which is an increase of about \$10,000 from the previous year. Commissioner Bonds started that as long as the Homeless Service Providers are spending down their funds, the City does not typically have a carryover for ESG.

Commissioner Bonds spoke about the other resources that the City has available in the community. The resources include a balance of about \$3.5M from the 2020 Lead Grant. There is a small balance remaining from NSP-1 and NSP-3 of a little over \$500,000. Those funds were received in 2009 and the City is winding them down. The City has a HUD Healthy Homes and Weatherization Grant with a balance of a little over \$100,000. Some of these funds are being layered with other funds in order to get them out into the community. The City also has a BP Husky Settlement Grant with a remaining balance of about \$830,000. In addition, the City has about \$34.6M remaining from funds received from the U.S. Treasury Department for rental assistance. The City has a whole team working on just the rental assistance grant. Some of those funds are expected to be allocated to some of the City's third-party partners for stabilization services as well. The City wants to get as many of those funds out into the community as soon as possible since many of them have expenditure deadlines. For CDBG-COVID, the City has a balance of about \$1.3M remaining. The City received a total of about \$5.8M in funding and there are a few third-party partners still spending down their funds. The City has plans to recapture and reallocate the funds before it has to send them back to HUD. For ESG-COVID, the City has about \$40,000 remaining and plans to reallocate these funds to another agency along with any other dollars that some of the partner agencies are unable to spend, so they can be spent before the deadline. The

City's deadline for spending the ESG-COVID funds is September, 2023. The remaining dollars will be reallocated to agencies that have pending projects so the City can expend the balance of the funds. In addition to the above, the City was approved for the Section 108 Loan Pool Program in the amount of \$37M. This program allows the City to borrow up to five times its annual CDBG allocation award amount, which totals about \$37M. With these funds, the City plans to complete facility and infrastructure improvements and economic development initiatives. The City is taking applications and there is a committee that will decide on who is awarded the funds.

Commissioner Bonds also provided an overview of how the CDBG Resources would be allocated. Again, before providing this information, she reiterated that this was only the draft Action Plan and the City would be making changes to the numbers. For the City's Homeless Service Providers, about \$306,000 is planned to be provided, which is about 4% of the total CDBG funds available. For Planning and Administration, there is a 20% CAP, so about \$1.471M is planned to be allocated for this activity. For Public Service activities, which include soup kitchens, youth programs, and Homeless Service Providers, the amount allocated is about \$796,000, or 10%. For Code Enforcement, about \$63,000 would be allocated, or a little less than 1%. For Housing, which was one of the highest priorities that the community identified for where the dollars should go, about \$2.9M was planned to be allocated, or about 35%. For Parks and Community Center Improvements, about \$2M would be allocated, or about 24%.

Jerry Culkowski, Lead Grant Manager, City of Toledo, DHCD, provided an overview of the HOME Investment Partnerships Program (HOME) resources. Mr. Culkowski stated that the total HOME dollars, about \$5M, includes the City's annual entitlement and carryover of about \$3.9M. For Community Housing Development Organizations (CHDO), about 16% would be allocated out of HOME funds; for Down-Payment Assistance, about 10%; for Homebuyer Unit Production, about 8%; for HOME Administration, about 7%; for the Development Pool, about 46%; for Homeowner Rehab, about 11%; and for Rental Rehab Projects, about 2%. The total HOME dollars through the ARP funds is about \$7.5M, with 10% for administration, 50% for rental housing development, and 40% for supportive services. Mr. Culkowski noted that the HOME data is still under review and will be presented to Toledo City Council.

Commissioner Bonds provided an overview of the City's ESG resources stating, once again, that this was the draft Action Plan and the information was subject to change. For Beach House, about 23% will be allocated; for the Toledo Lucas County Homelessness Board, about 7.5% to 8%; for United Way, about 17%; for Family House, about 22%; and for St. Paul's Community Center, about 19%.

At this time, Commissioner Bonds asked the audience whether there were any questions on the information presented so far. There were no questions or comments at this time.

Michael Hart, Executive Director, Toledo Lucas County Homelessness Board (TLCHB), provided an overview of their agency's activities. Joining him was Candace Bishop, Director of Operations and Compliance. Mr. Hart explained that TLCHB partners with the City of Toledo in terms of consultation on the Emergency Solutions Grant (ESG) and oversight of the Continuum of Care (CoC). TLCHB serves as the collaborative applicant for the local CoC, which integrates in many different ways with the ESG program. TLCHB also manages the Homelessness Management Information System (HMIS), which ensures they have system-wide data so there is a clear picture of how they can prioritize resources in the best way possible. TLCHB's mission is to further collaboration and accelerate solutions to end homelessness. They work with many partners and some of the activities they perform in partnership with the City include development of the Action Plan, development and update of the Consolidated Plan, and program monitoring. TLCHB goes out on a monthly basis to work with their partners to ensure all client records are compliant with ESG regulations, funds are being spent down on a timely basis, and they are

getting the outcomes they need to see in terms of those experiencing homelessness. Mr. Hart stated that these resources are critical in ending homelessness and TLCHB appreciates the hard work being done by the City of Toledo.

George Thomas, CEO and General Counsel, Toledo Fair Housing Center (TFHC), provided an update of their agency's activities. One of the activities provided by the TFHC is fair housing enforcement services. Mr. Thomas explained that if anyone experiences housing discrimination, they can contact the TFHC and they will evaluate their case and help gather information so it can be investigated further. This includes conducting fair housing testing where the TFHC goes out into the community and tests for housing discrimination, and then files complaints on that housing discrimination. The TFHC has been very successful in pursuing litigation and filing complaints with the Ohio Civil Rights Commission and HUD.

One of the most important roles of the TFHC is their work in affirmatively furthering fair housing and the City's Analysis of Impediments to Fair Housing Choice. Mr. Thomas explained that where you live has a huge impact on your life and your life outcomes, and research reveals that where you live has a bigger impact in your life outcomes than even your DNA. Housing, in particular, affects every aspect of your life, such as where you live, the neighborhood, and the housing you have access to. All of these have a huge impact on everything from fresh air, clean water, good public transportation, living-wage jobs, quality healthcare, and healthy foods. The Affirmatively Furthering Fair Housing rule is designed to help ensure that everyone regardless of race, gender identity, ethnicity, family status, disability, or religion has a range of choices for where they live. This is important because, for a long time, federal, state, and local governments have fostered segregation and funneled investments in a way that helped and supported some, while denying opportunities and harming others. This created inequitable systems, including residential segregation and appraisal inequities.

Mr. Thomas stated that part of the solution for this was the passage of the Fair Housing Act and the Affirmatively Furthering Fair Housing rule. Every entity receiving federal funds, such as the City of Toledo, must take actions within their housing and community development programs to eliminate housing discrimination. The City has a local Analysis of Impediments that looks at what the impediments are to fair housing choice and identifies clear action steps to overcome those impediments. Some of the impediments identified in Toledo included criminal history screening where housing providers look at a person's criminal history as a basis for denying them housing. Housing providers need to be educated to make sure they are not screening based on criminal history. Mr. Thomas stated that another impediment identified was source of income discrimination. The City passed a source of income discrimination law that prohibits discrimination against voucher holders and other persons trying to access housing through social security disability payments. Additionally, Mr. Thomas stated that it's important that the local zoning policies better welcome affordable housing and group homes for persons with disabilities and also that these affordable housing opportunities are integrated throughout the community, not just concentrated in certain neighborhoods. The TFHC is looking at policies regarding access and location of group homes and are recommending changes to the local zoning code to better welcome housing opportunities in the area.

Kattie Bond, Senior Vice President of Operations and Community Development, Lucas Metropolitan Housing (LMH), spoke about LMH's activities. Ms. Bond stated that LMH has three major strategies they will be working on for the upcoming year. Currently, LMH has a portfolio of about 2,633 public housing units, 4,685 housing choice vouchers, 322 low-income housing tax credits, eight market-rate units, and 107 homeownership properties. LMH serves a total of about 17,500 people in Northwest Ohio. One of LMH's three major focus areas planned for the upcoming year includes their new strategic plan. They have already started the process and will begin interviewing and surveying employees, partners, and community stakeholders. They will identify and analyze strategic issues, develop objectives and action plans, and then implement the strategies.

Ms. Bond stated that LMH's mantra for 2023 is "Building for the Future" as it relates to housing and they are going to be working on a portfolio repositioning strategy, which has a two-prong approach. This includes creating housing opportunities in existing high-opportunity neighborhoods and improving conditions to create mixed-income new communities of choice. LMH will transition away from their public housing portfolio to a subsidy platform and a housing choice voucher platform while keeping the units affordable at 30% of area gross income and ensuring that the fiscal health of the agency is viable. They will increase the number of apartment homes available through a combination of new construction and renovations. They will use project-based vouchers, low-income housing tax credits, and will be leveraging the rental assistance demonstration program, which is a HUD program that allows housing authorities to convert their public housing subsidy into a voucher project-based rental assistance platform. LMH's portfolio repositioning strategy will also transition to a more flexible and viable financial platform. Ms. Bond explained that since the current capital backlog for the country is about \$70M, converting from the public housing platform to a subsidy, project-based rental assistance voucher platform will help to relieve the capital backlog. In addition, LMH will renovate their existing housing stock to address the capital backlog and develop new mixed-income communities. Their portfolio repositioning strategy will focus on major projects, including the Park Apartments at a \$14M investment; Collingwood Green, Phase IV, at a \$20M investment; Collingwood Green, Phase V, at a \$28M investment; McClinton Nunn Homes Redevelopment at a \$108M investment; Palmer Gardens (located in a high-opportunity area) at a\$15M investment; and TenEyck Towers at a \$15M investment.

Additionally, LMH will be focusing on the Choice Neighborhood Initiative, which is a program that allows housing authorities to redevelop properties within their public housing properties and in partnership with the public housing properties' surrounding neighborhood. LMH applied for an implementation grant in January, 2023, for a total of \$40M, which includes \$26M under the Housing category, \$8M under People, and \$6M under the Neighborhoods category. They also leveraged \$81M, for a total project of \$121M. They will also be conducting meetings to talk about their lead agencies under the People, Housing, and Neighborhoods' categories. In addition, LMH will focus on their Pathways to Self-Sufficiency by creating a Financial Opportunity Center that will serve the McClinton Nunn and Collingwood Green neighborhoods. They hope to be totally up and running by March, 2024. LMH will also leverage their Housing Choice Voucher Program to support families for homeownership and will continue to provide information and financial resources to make homeownership more affordable.

Commissioner Bonds expressed her thanks to all of the City's partners and presenters for their great work. Commissioner Bonds stated that it takes everyone to really make an impact in the neighborhoods and improve the quality of life for residents.

Mr. Culkowski spoke about the housing initiatives being worked on by the DHCD and their partners. Projects include Owner-Occupied Rehabilitation, which provides homeowners with assistance in getting their houses rehabbed and up to code; Homebuyer Development, which targets construction of new homes, as well as incorporating down-payment assistance; Rental Development, which provides rehabilitation and revitalization of rental properties; Down-Payment Assistance, which provides financial assistance to first-time homebuyers; Emergency Repair Program and Emergency Repair, which address immediate emergencies for homeowners; Homebuyer Development, which provides new construction and down-payment assistance; Tenant Based Rental Assistance (TBRA), which provides rental assistance to individuals; Housing Problem Solutions Program; and Emergency Rental Assistance Program (ERAP), which started with COVID-19 and provides assistance and relief to renters who may have gotten behind on their monthly rent due to circumstances relating to COVID.

Mr. Culkowski further spoke about the Lead-Based Paint Hazard Control Program activities. He stated that the DHCD receives non-entitlement funds in order to address targeted housing concerns. During the upcoming Action Plan year, the DHCD proposes to address lead-based paint hazards identified in

approximately 124 eligible owner-occupied and rental-residential units. This will be accomplished through the utilization of three primary multi-year funding sources, including two from the Office of Lead Hazard Control and Healthy Homes, and one from the Lucas County Regional Health District, referred to as the BP Husky Settlement Funds. Each one of those funding sources has a target for each year. The 124 eligible owner-occupied and rental units is an aggregate of the annual target for each one of those three programs. Mr. Culkowski noted that additional details and specifics on the DHCD's Lead-Based Paint Hazard Control initiatives can be found in Section AP-85, Lead-Based Paint Hazard Control Activities, in the City's Annual Action Plan.

Commissioner Bonds spoke about some of the economic development activities that the City is working on, which will be done through the Section 108 Program. The City will partner with the Economic and Community Development Institute (ECDI) and possibly the Local Initiatives Support Corporation (LISC) to do some Equity and Inclusion Small Business Loans and provide technical assistance to the City's low- to moderate-income businesses. The City's Section 108 will be used for a loan pool to provide reasonable fixed-rate loans to help bridge the gap for borrowers. Through that initiative, the City hopes to create and retain jobs, increase affordable housing, advance equity and equitable development opportunities, and expand on the existing tax base. The City also plans to work on Equitable Development Projects that support investments in the community and neighborhoods of color and/or provide financing to BIPOC-led developers, businesses, or organizations. Eligible activities include housing rehabilitation, acquisition of real property, economic development, and public facility improvements.

In addition, the City will be working on the Swayne Field Revitalization Project. The City is partnering with The Collaborative, Land Bank, Boys & Girls Club of Toledo, area community partners, and residents and stakeholders in the Englewood neighborhood. The City is in the process of developing a vision for the future Swayne Field property. Some design work has already been completed and the City plans to provide a training center at the property. The City hopes to make an impact in the community that will transcend into helping residents in the area.

Ms. Brown spoke about the City's Neighborhood Revitalization Strategy Areas (NRSAs). She stated that the City recently received approval from HUD on March 14, 2023 for two designated NRSAs. The first NRSA will be located in the Old South End, bounded by the Anthony Wayne Trail to the north, Kuhlman Street to the east, Bartley Place to the west, and Lotus Street/Maumee River to the south. The second NRSA will be located in the Englewood neighborhood, west of the downtown area, and bounded by West Snead Avenue to the west, I-75 to the north, Monroe/Collingwood to the east, and Dorr Street to the south. The City will continue to work in bringing more dollars into these two designated areas.

Mr. Culkowski provided an update on the Rooftops Program, which is another initiative being worked on by the DHCD. The City had gone through the application process, which was an open application process where people applied online. This project is being done through a lottery system. There were 552 applications submitted with approximately 300 of those applications selected for full applications. Out of those 300 applications, 90 have been approved. The City is still going through the review process for many of those. Approximately 21 applications have been denied due to individuals being over income or properties not being located in the City of Toledo. Funding for this program will include approximately \$2.6M from ARPA funds and approximately \$300,000 from CDBG over two years at \$150,000 each year. Currently, there are 18 roofing contractors that are fully vetted for the program. Construction is estimated to start on April 1, 2023.

Coleena Ali, Tenant-Landlord Service Manager, City of Toledo, DHCD, spoke about the tenant-landlord initiative. Ms. Ali explained that her position was newly created and came out of the Comprehensive Housing Strategy that was completed about a year ago in order to focus on the tenant and landlord rental market. One of the initiatives being worked on includes a survey that went out — one for

landlords and one for tenants – to try and get an understanding of what is going on in the community. Information from the surveys will be used to understand landlord and tenant experiences and allow the City to develop marketing and educational pieces. This information will then be shared with the City's community partners to help drive program creation, grant applications, and educational development. The deadline for submitting the surveys has been extended through April 28, 2023. The City has already received some good feedback and are hoping to receive more. Ms. Ali encouraged all landlords and tenants to complete the survey so the City can receive as much information as possible.

Ms. Ali also spoke about the Housing Stability Innovation Grant (HSIG). This grant is scheduled to go out sometime in April or early May, 2023. The City received funding from the U.S. Treasury from ERA-1 and ERA-2 and a portion of those funds will be allocated to housing stability. This grant will focus on four areas including Outreach, Education, Tenant Protection, and Eviction Diversion/Prevention. Nonprofit agencies and other entities may apply for this grant as long as they meet one of those four categories. The funding may be used for staff or programming.

Ms. Brown talked about the process for submitting written comments. The public comment period started on Wednesday, March 22, 2023, and will end on Thursday, April 20, 2023. All comments should be submitted to the City of Toledo, Department of Housing and Community Development, 2023-2024 One-Year Action Plan. On Government Center, Suite 1800, Toledo, Ohio 43604. The Draft Action Plan is available for viewing on the City of Toledo's website. Citizens may also come to the DHCD's office to view the Action Plan. It is also available for viewing in the Office of the Mayor, the Clerk of Council, and on the websites of the Toledo Fair Housing Center, Lucas Metropolitan Housing, Toledo Lucas County Homelessness Board, and the Lucas County Board of Developmental Disabilities. In addition, copies are available at the main Toledo/Lucas County Public Library and citizens may request to view it at all other branches of the library.

At this time, Commissioner Bonds opened it up for questions and/or comments. There were no questions or comments from those attending the public hearing.

Commissioner Bonds closed the public hearing by thanking everyone for attending. She said it was good to hear from all of the City's partners who presented and talked about their plans for addressing the needs of the community in the upcoming program year.

The second public hearing will be held on Thursday, March 30, 2023, at 5:30 p.m., via Zoom. The Draft Action Plan is available for review on the City of Toledo's website.

On behalf of Director Clemens and the Department of Housing and Community Development, Commissioner Bonds concluded the public hearing.

2nd VIRTUAL PUBLIC HEARING SUMMARY

DRAFT 2023-2024 ONE-YEAR ACTION PLAN Thursday, March 30, 2023, 5:30 p.m.

A public notice was posted on electronic media and published in local newspapers announcing the virtual public hearing. Due to the COVID-19 Pandemic, the public hearing was held virtually and was accessible to the public through live streaming. Those attending were given the opportunity to ask questions and provide comments.

Bonita Bonds, Commissioner of Administrative Services, City of Toledo, Department of Housing and Community Development (DHCD), began by welcoming everyone to the 2nd Draft 2023-2024 One-Year Action Plan public hearing. Commissioner Bonds reminded everyone that the public hearing was being recorded and the recording would be submitted to the U.S. Department of Housing and Urban Development (HUD) as part of the Action Plan. She also stated that other DHCD staff, as well as some of the City's partners who will assist in carrying out projects for 2023, would be joining her at this public hearing.

Commissioner Bonds provided an overview of the Five-Year Consolidated Plan and Annual Action Plan. She explained that the Consolidated Plan is a five-year plan that includes an assessment of the City's needs in terms of affordable housing and community development and that the City of Toledo is currently working under the 2020-2024 Five-Year Consolidated Plan. She said the City had a steering committee and focus groups, and through the engagement process and data analysis, was able to put together priorities based on the community. There were also surveys that went out into the community where citizens told the City what they felt the needs were. From this process, the priorities were developed for the next five years.

Commissioner Bonds explained that the Action Plan is a one-year annual plan within the Five-Year Consolidated Plan that identifies what the City plans to do each program year. Each year, the City provides HUD with a plan of how it's going to address all of the priorities included in the Consolidated Plan and the goals it will put forth, as well as the activities that will be completed in order to meet those priorities. The priorities for the current Consolidated Plan include the following, which are ranked in the order of importance: 1) Improve housing affordability; 2) Improve neighborhood conditions; 3) Increase housing repairs and housing preservation; 4) Economic development (job creation/access and business assistance); 5) Provide adequate housing and services for homeless/at-risk populations; 6) Provide adequate housing and services for other special needs populations; 7) Provide social services within the community (soup kitchens, shelters, feeding programs, community gardens, and youth programs); 8) Fair housing; and 9) Improve public infrastructure for low- to moderate-income households and areas.

Commissioner Bonds stated that out of all the activities the City undertakes, it must address outcomes and objectives. HUD has three National Objectives including 1) Benefit to low- and moderate-income individuals, families, households, and areas; 2) Eliminate slum and blight in the community; and 3) Urgent Need, which addresses a national disaster such as an earthquake. Currently, the City of Toledo doesn't have an urgent need, so all of the activities that are undertaken will either benefit low- to moderate-income people, families, households, areas, or eliminate slum and blight in the community. Each of those activities must also address an objective including 1) Suitable Living Environment, 2) Decent Housing, or 3) Economic Opportunity, as well as an outcome including 1) Improve Availability/ Accessibility, 2) Improve Affordability, or 3) Improve Sustainability.

Additionally, Commissioner Bonds explained that the City needs to do an evaluation of its performance, which is completed in September of every year. The City is required to provide a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD. She stated that the City's Action Plan tells HUD

what it's going to do and the CAPER tells HUD what it did do, or provides an evaluation of its performance. HUD checks to ensure the City is staying within all of its CAPs, addressing all of its priorities, and is continuing to assist the needs of low- to moderate-income persons through the activities that it undertakes. The City's HOME dollars are evaluated for performance of its activities including down-payment assistance, Tenant-Based Rental Assistance (TBRA), rehabilitation of owner-occupied and rental housing units, and special projects for multi-family housing and scattered-site rehabilitation. The City continues to work with its lead Continuum of Care (CoC), the Toledo Lucas County Homelessness Board (TLCHB), in efforts towards the elimination of homelessness in the community and uses Emergency Solutions Grant (ESG) funds and other funding to address that need.

Monica Brown, Community Planning and Development Grants Manager, City of Toledo, DHCD, talked about the application process and timeline. The DHCD started its application process on Friday, January 13, 2023. On this date, the Non-Homeless Service Providers and Homeless Service Providers picked up their applications. On January 25, 2023, the DHCD opened up its office to new applicants only for providing application assistance and answering questions. On Thursday, January 26, 2023, an application question session was held via Zoom for the Non-Homeless Service Providers to allow them to ask questions regarding the application, or application process. One Friday, January 27, 2023, an application question session was held via Zoom for the Homeless Service Providers. All applications were due from the Non-Homeless and Homeless Service Providers on Friday, February 10, 2023, at 4:45 p.m. Today (Thursday, March 30, 2023) is the second public hearing on the Draft Action Plan. The first public hearing was held on Thursday, March 23, 2023, at 5:30 p.m., via Zoom. The City's legislation for the Draft Action Plan is scheduled to be on City Council's agenda on Tuesday, April 11, 2023, at 2:00 p.m., for first reading. On Thursday, April 18, 2023, at 4:00 p.m., the second reading of the legislation will occur with possible passage. The final date for submitting the 2023-2024 One-Year Action Plan to HUD is Wednesday, May 17, 2023.

The City has a comprehensive approach to citizen participation that is detailed in the City of Toledo's Citizen Participation Plan, which can be found on the City's website. In the development of the Action Plan, the City consulted with local organizations engaged in housing, community, and economic development. There is a 30-day comment period on the Draft Action Plan, which started on Wednesday, March 22, 2023. The public hearings and 30-day comment period are promoted through a media campaign, including public notices, press releases, website postings, Facebook postings, and emails to the City of Toledo's community partner organizations. The public hearings are provided in facilities that provide adequate access to disabled individuals, or if held virtually, any necessary services will be provided upon request.

The City had two Citizen Review Committees that were established to review and evaluate the proposed funding requests from applicants. One committee reviewed and evaluated the Non-Homeless Service applications and the other reviewed and evaluated the Homeless Service applications. Members of the Citizen Review Committees represented various community sectors including banking institutions, religious institutions, healthcare providers, the Toledo/Lucas County Public Library, financial sector, economic development, and social service agencies.

The minimum application requirements for Homeless and Non-Homeless Providers include being a nonprofit 501(c)(3) and in operation at least two years, government agencies (government entities/ quasi-government agencies (not-for-profit)), other nonprofit 501(c)(3) (in operation at least two years), homeless service providers, or agencies demonstrating capacity to implement proposed activities or projects.

Commissioner Bonds provided a breakdown of the applications that the City received for its 2023 entitlement funds. For CDBG, the City received 28 applications with requests totaling \$3,150,860. For

HOME, the City received four applications with requests totaling \$1,719,297, and for ESG (Homeless Services), the City received 14 applications with requests totaling \$934,860. Commissioner Bonds also reported on the resources, but reiterated that the numbers being presented were draft numbers only and the City was still compiling information. She stated that the City did receive confirmation from HUD on its 2023 allocation. For CDBG, the City's 2023 allocation will be \$7,355,028, which is a slight reduction from 2022 of about \$18,000. The City will have approximately \$451,167 in carryover, bringing the total CDBG resources to \$7,806,195. For HOME, the City's 2023 allocation will be \$2,551,780, which is an increase of about \$200,000 from 2022. The City will have a carryover of approximately \$1,357,597. The City will also receive some HOME-ARP funds that will be used to address the COVID Pandemic. The City had previously received emergency funds back in 2020 from CDBG and ESG, but the HOME-ARP funds are just reaching the community now. That amount totals \$7,871,962, bringing the total amount of HOME resources to \$11,781,339. For ESG, the City's 2023 allocation will be \$648,066. The City typically does not have a carryover for ESG as it has a hard expenditure deadline which it tries to meet every year.

Some other resources available to the City include a Lead Hazard Control and Healthy Homes Grant at approximately \$3.5M. The City is finishing up its NSP funds and has about \$500,000 remaining. The City also has some HUD Healthy Homes & Weatherization funds of about \$106,000; a BP Husky Settlement Grant from the Health Department of about \$834,000; U.S. Treasury Rental Assistance of about \$34,693; CDBG-CV COVID of about \$1.377M; and ESG-CV COVID of about \$40,000, which has a hard expenditure deadline of September 2023. In addition, the City has also been approved for a Section 108 Loan Pool of \$37M.

Commissioner Bonds also spoke about the allocation of the 2023 CDBG resources. About \$306,000, or 4%, will be allocated to the Homeless Service Providers; about \$1.471M, or 18%, will be allocated to planning and administration; about \$796,000, or a little more than 10%, will be allocated to public service activities; about \$63,000, or a little less than 1%, will be allocated to code enforcement; about \$2.9M, or 35%, will be allocated to housing, which is a top priority; and about \$2M, or 24%, will be allocated to community center improvements. Commissioner Bonds pointed out that the funding recommendations made by the Citizen Review Committees would need approval from the Mayor and City Council.

Jerry Culkowski, Lead Grant Manager, City of Toledo, DHCD, spoke about the allocation of the 2023 HOME funds. About \$636,000 will be allocated to Community Housing Development Organizations (CHDO), with about half of this coming from carryover funds. Down-Payment Assistance, which provides assistance to first-time homebuyers, will receive about 10%. Homebuyer Unit Production, which is for new construction and down-payment assistance of new housing units, will be allocated about \$300,000, or 8%. HOME administration, which covers the City's administration costs, will receive 7%. Development Pool, which includes both rehabilitation projects and new construction, as well as support for the City's affordable rental housing initiatives, will receive about 46%. Homeowner Rehab, which provides assistance to owner-occupied units to help bring them up to code, will receive about 11%. Rental Rehab, which will provide assistance to rental housing properties, will receive about 2%. In addition, the City also receives some American Rescue Plan funds for HOME. Approximately 11% will be for administration of these funds. Rental Housing Development will receive about 49%, and about \$3M to be allocated for supportive services, including housing rehab and roof repairs. The HOME Rescue Plan funds total a little more than \$7.5M.

Commissioner Bonds provided an overview of the resources for the 2023 ESG funds. About \$148,000 will be allocated to Beach House, or 23%. The Toledo Lucas County Homelessness Board will be receiving administration funds of about \$48,000, or 8%. United Way of Greater Toledo, who is the City's lead for coordinated access, will be allocated about \$100,000, or 17%. Family House, the City's largest

family shelter, will be allocated about \$135,000, or 21%. St. Paul's Community Center will be allocated about \$125,000, or 19%. Commissioner Bonds reiterated that these are draft numbers and the City was looking at funding some of the Homeless Services Providers out of other funding sources.

Mr. Culkowski provided an update on the City's housing initiatives and the Lead Grant. Mr. Culkowski explained that the City of Toledo receives non-entitlement funds in order to address targeted housing concerns. One of those concerns is addressing lead-based paint hazards in residential units in the City. During the upcoming Action Plan year, the DHCD is proposing to address lead-based paint hazards identified in approximately 124 eligible owner-occupied and rental residential units. This will be accomplished through the utilization of three of the primary multi-year funding sources, which include two from the Office of Lead Hazard Control and Healthy Homes, and one from the Lucas County Regional Health District through the EPA settlement funds received from BP Husky. Mr. Culkowski stated that additional details on the DHCD's Lead-Based Paint Hazard Control initiatives could be found in the Action Plan, Section AP85, in the Lead-Based Paint Hazard Control activity section.

Kattie Bond, Senior Vice President of Operations and Community Development, Lucas Metropolitan Housing (LMH), provided an overview of their planned 2023 activities and programs. Ms. Bond stated that LMH was established in 1933 and has a Housing Choice Voucher Program and a Low Income Public Housing Program. LMH's portfolio in their public housing programs consists of about 2,633 vouchers and 4,685 housing choice vouchers. They have mixed-income developments with low-income housing tax credits. Their nonprofit affiliate is managing eight market-rate units and scattered-site homeownership and rental properties. LMH will be working on a new strategic plan for 2024-2028 and is currently in the process of interviewing and surveying employees, partners, and community stakeholders. Once this information is compiled, they will identify and analyze all of the strategic issues and feedback, and then develop objectives and action steps to implement their strategies.

One of LMH's biggest initiatives will include their housing investments. They plan to have a portfolio repositioning strategy beginning in 2023. LMH looks at housing with a two-prong approach to include creating housing of opportunity in existing high-opportunity neighborhoods and improving neighborhood conditions to create mixed-income communities of choice. LMH will transition their public housing portfolio to a subsidy-based platform. There is a large backlog of housing units across the country, so one of things that HUD has allowed them to do is to take that public housing subsidy and move it to a more flexible platform, such as a project-based voucher. In conjunction with low-income tax credits, they are able to renovate public housing and/or redevelop a whole new development, such as their Collingwood Green development, Phase III. They will also increase the number of apartment homes available through construction and renovation project-based vouchers, project-based rental assistance, housing choice voucher, and RAD. LMH will continue to improve neighborhood conditions in high-opportunity areas, as well. They will transition to a more flexible and reliable financial platform on a tiered approach. This year, LMH plans to focus on five or six major projects, including the Park Apartments; Collingwood Green, Phase IV and V; Palmer Gardens, located near the University of Toledo, which is a renovation project that is considered to be in a high-opportunity neighborhood; and will also do a RAD conversion of the TenEyck Towers.

Ms. Bond stated that one big initiative for housing is their Choice Neighborhood initiative, which is a premier program from HUD for neighborhood revitalization surrounded by public housing. The goal is to improve the quality of life and create neighborhoods of choice. LMH is looking at the Junction area and the McClinton Nunn public housing development. LMH submitted an implementation grant in January, 2023, applying for a total of \$40M. They received \$81M in leverage for a total of \$121M. This grant is broken down into three key categories including People, Neighborhoods, and Housing. They will receive \$26M for Housing, \$6M for People, and \$8M for Neighborhoods.

In order to get their residents prepared, LMH is starting an initiative called "A Pathway to Self-Sufficiency." One of their biggest projects is the establishment of the first Financial Opportunity Center under a housing authority in the State of Ohio. LMH will provide their residents with employment assistance, financial education, and one-to-one coaching coupled with their Housing Choice Voucher Program. Once a person is ready to move on, they will be sent to LMH's voucher program if they have a voucher, and then to LMH's nonprofit affiliate for homeownership counseling. Building the pathway to self-sufficiency includes being able to wealth build, which is an important component to stabilizing families. LMH will increase the source of financial assistance to make the homes affordable, which is now being done by their nonprofit affiliate. They also plan to build better connections with their financial institution through outreach and education programs, and they want to strengthen their partnership with their nonprofit affiliate, Lucas Housing Services, to increase and sustain affordable homeownership opportunities.

George Thomas, CEO and General Counsel, Toledo Fair Housing Center (TFHC), reported on their agency's activities for 2023. Mr. Thomas explained that the Five-Year Consolidated Plan and One-Year Action Plan highlight fair housing as an issue and HUD directs local communities to prioritize it as an important issue in the area. He spoke about the two ways that the Toledo Fair Housing Center works in partnership with the City of Toledo on this in the community. One way is through the fair housing enforcement program, funded in part by CDBG, and the second is through affirmatively furthering fair housing. Over the last year, the TFHC completed more than 2,000 intakes. They also open many of those cases and assist individuals with pursuing claims of housing discrimination. The TFHC talks with individuals about the evidence they may have, the housing discrimination they may have experienced, and helps organize that evidence and file claims with the Ohio Civil Rights Commission, HUD, or in court. Since the beginning of their existence in 1975, the TFHC has returned more than \$35M back into the community through fair housing cases and handled more than 13,000 complaints.

Mr. Thomas said that another important part of what the City does is affirmatively furthering fair housing. He explained that where you live has a huge impact on how your life unfolds and it varies tremendously by the neighborhood and housing you have access to. Housing affects every aspect of your life as far as the fresh air, clean water, good public transportation, living wage jobs, quality healthcare, access to healthy foods, and safe and affordable credit. He stated that all of that is determined in part by what neighborhoods and housing you have access to. The affirmatively furthering fair housing rule can help ensure that all people regardless of race, gender identity, ethnicity, family status, disability, or religion have a range of choices about where to live and that all neighborhoods are great places to live. Mr. Thomas stated that it has been the law for 55 years that any jurisdiction or entity that uses federal funds must use those dollars and operate all of their housing and community development programs in a way that expands fair housing opportunities, increases the supply of affordable/accessible housing, and creates well-resourced viable neighborhoods. Every five years the TFHC assists the City by completing an Analysis of Impediments (AI) that includes collecting demographics, meeting with focus groups, and completing surveys to try and better understand what the barriers are to fair housing choice. The outcome to this is an Action Plan that not only identifies the barriers to fair housing choice, but action steps that can be taken locally to try to overcome those barriers and meet the goals of the Fair Housing Act.

Mr. Thomas continued by highlighting three issues identified in the Al. The first issue talked about was criminal history screening. He stated that when housing providers screen applicants based on their criminal history, it harms Black and Latino applicants and there is ample evidence of this in demographic data and studies that HUD and others have referenced. The TFHC often files cases alleging discrimination based on criminal history screening. The TFHC had two cases of this recently where the Ohio Civil Rights Commission found probable cause that discrimination occurred, specifically in criminal

history cases in which the housing provider had a policy of screening applicants in a way that made it tougher for certain protected classes.

The second issue talked about was source of income discrimination. Mr. Thomas said this is an important trend that has been going on for a long time. Some States now ban source of income discrimination. When individuals try to find housing, they should not face discrimination due to the fact that they have a housing choice voucher, or pay their rent with social security disability payments. Locally, this was found to be an issue and because of advocacy by the TFHC and others, the City passed a local source of income discrimination law. In the next year, the TFHC hopes to see more resources, staffing, and budget put behind that law to ensure it is strongly enforced.

The third issue mentioned by Mr. Thomas was land-use and zoning rules. He stated that it has been identified that zoning can sometimes be a concern, particularly in this area, where it has been identified that sometimes it is very difficult for housing to be developed for persons with disabilities. The TFHC has made some recommendations to change the local zoning code that would help improve this. The TFHC hopes that in the next year, these changes can take place so it's easier to develop housing for persons with disabilities, such as group homes or other types of affordable housing. It's important that housing developments are integrated throughout the whole community so there is range of choices in different neighborhoods when considering affordable housing in the area.

Michael Hart, Executive Director, Toledo Lucas County Homelessness Board (TLCHB), provided an update of their planned activities for 2023. He said their vision for Lucas County is for everyone to have a safe, healthy, accessible, and affordable place that they're proud to call home. TLCHB's mission is to further collaboration and accelerate solutions to end homelessness. TLCHB serves as the collaborative applicant and HMIS lead for the local Continuum of Care (CoC), meaning they have a responsibility to both facilitate the competition for the CoC program under HUD and work and collaborate with the participating jurisdiction on the Emergency Solutions Grant (ESG) funds and any other funds that go to homeless service providers from the City of Toledo. TLCHB works with the City on a number of activities including updating, maintaining, and executing the Consolidated Plan, the One-Year Action Plan, and other required reporting through HMIS. They also serve as a program monitor for all of the programs for Homeless Service Providers that are funded through the City and ensure that those funds are being used in a way that is compliant with federal regulations, as well as meeting the local standards that have been collectively set. TLCHB's goal is to help support those resources in the community that will ultimately end homelessness.

Mr. Culkowski spoke about the housing initiatives and the organizations that will be funded in 2023. Projects and activities being funded include owner-occupied rehabilitation, which assists homeowners address repair needs in their home; homebuyer development, which includes new construction and down-payment assistance for construction of new homes; rental development, which is for rehabilitation and revitalization of rental properties; down-payment assistance, which provides assistance to first-time homebuyers with down payments; emergency repair program, which is targeted for seniors to address immediate emergency repair needs in their home; Tenant-Based Rental Assistance (TBRA), which provides rental assistance to tenants; Housing Problem Solutions Program, which provides housing stability and is currently being funded through the City's ERA funds, but will be shifted to the Housing Problem Solutions grant; and Emergency Rental Assistance, which provides COVID-related assistance to persons.

Commissioner Bonds reported on some of the other initiatives the City is working on. The City will be doing economic development and will work with the Economic and Community Development Institute (ECDI) for equity and inclusion small business loan and technical assistance. The City's plan is to leverage some funding towards that initiative to include CDBG. In addition, the City has been approved

by HUD for a Section 108 Loan, which is about \$37M and will be used for a loan pool to provide long-term, fixed-rate, and reasonably priced financing that would otherwise not be available through the conventional methods. Funds will be used to bridge financing gaps and enable borrowers to proceed with their transactions for business, creating and retaining jobs, increasing affordable housing units, and expanding on the existing tax base. Other activities include equitable development projects that will support investments in communities and neighborhoods for developers, businesses, or organizations, along with some housing rehabilitation, which will include acquisition of real property, economic development, and improvements to public facilities.

Commissioner Bonds reported on the Swayne Field Revitalization Project. She stated that the City of Toledo is working with The Collaborative and the Land Bank, Boys & Girls Club, community partners, residents, and stakeholders in the Englewood neighborhood. They have been meeting and the City is putting the funding together to help with this revitalization.

Commissioner Bonds also spoke about the two Neighborhood Revitalization Strategy Areas (NRSAs), which the City had received approval for from HUD. One NRSA is in the Old South End and the other is located in the Englewood area. This designation allows the City to leverage more CDBG funds in those two areas, and with partnerships in those areas, the City hopes to see a huge impact.

Mr. Culkowski provided an update on the City's Rooftops Program. The DHCD is putting together and initiating a rooftops program to assist homeowners in need of new roofs. This program is being done through a lottery system. There were initially 552 applications submitted electronically and 300 applications were selected to be reviewed. Out of those 300, there were 90 applications approved based on eligibility and currently there are about 21 applications that have been denied due to being over income or not being located in the Toledo area. Available funding includes \$2.6M from the City's ARPA funds and \$300,000 from CDBG to be funded at \$150,000 annually for two years. There currently are 18 roofing contractors that have been vetted for the program. The estimated construction start is mid to late spring, 2023, after all the roofs have been evaluated, work specifications have been written, and the contracts have been signed with the respective roofers.

Coleena Ali, Tenant-Landlord Service Manager, City of Toledo, DHCD, spoke about the City's Tenant Protection Initiative. Ms. Ali stated that her position is brand new to the City and is a result of the City of Toledo's Comprehensive Housing Strategy, called "Toledo Together," which began in late fall of 2020 and was completed in October, 2021. She said what they found in this study was that almost half of the population in Toledo (49%) were renters and the City did not have a mechanism or a person to monitor the rental market, particularly related to evictions and local ordinances, such as the source of income ordinance, so a position was created to focus on this. Two things being worked on include a community-wide tenant/landlord survey, which is currently being conducted. The survey is being used as an information tool and the feedback from that survey will be used to create marketing and other initiatives, not only for the City of Toledo, but also with the City's partner agencies so they will be able to use the information for their programs. The survey has been extended and will close on April 28, 2023.

Ms. Ali stated that the second thing being worked on includes the Housing Stability Innovation Grant (HSIG), which will be available to nonprofits and other governmental entities as they work to create housing stability. The grant will focus on four areas including outreach, education, tenant protection enforcement, and eviction diversion/prevention. This grant is a one-time funding and the City is looking for creative ideas and programs that will further housing stability. The grant will allow grantees the opportunity to explore and implement their creative programming and the Grant will be funded under ERA Housing Stability funds. Ms. Ali encouraged all tenants and landlords to go to the City's website and complete the survey.

Ms. Brown talked about the availability of the Draft 2023-2024 One-Year Action Plan and the process for submitting public comments. The Draft 2023-2024 One-Year Action Plan is available for review at the Department of Housing and Community Development, located at One Government Center, 18th Floor; the Mayor's office, located at One Government Center, 22nd Floor; and the Clerk of Council, located at One Government, 21st Floor. Copies are also available on the websites of the Toledo Fair Housing Center, Lucas Metropolitan Housing, Toledo Lucas County Homelessness Board, and the Lucas County Board of Developmental Disabilities. In addition, there are three copies of the Action Plan available at the main Toledo/Lucas County Public Library and copies may be requested at any of the library branches as well. It is also posted on the City of Toledo's website. The 30-day public comment period started on Wednesday, March 22, 2023, and will end on Thursday, April 20, 2023. Written comments may be sent to the City of Toledo, Department of Housing and Community Development, 2023-2024 One-Year Action Plan, One Government Center, Suite 1800, Toledo, OH 43604.

Commissioner Bonds closed by explaining the next steps in the process. She stated that the City would be seeking the Mayor's approval on all funding recommendations. Afterwards, the City will be providing the legislation for City Council approval on Tuesday, April 11, 2023, with possible passage on Tuesday, April 18, 2023. The City plans to submit the final 2023-2024 One-Year Action Plan to HUD on Wednesday, May 17, 2023.

Commissioner Bonds then opened it up for questions and/or comments. There were no questions or comments from those in attendance.

On behalf of Director Clemens and the Department of Housing and Community Development, Commissioner Bonds concluded the public hearing by thanking everyone for attending, as well as thanking all of the presenters and partners for their great partnership with the City of Toledo in addressing the needs of the community.

PUBLIC NOTICE

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2023 Program Year (July 1, 2023 - June 30, 2024).

CDBG applications will be accepted with a funding priority for the following programs/activities:

Programs/Activities

Housing Preservation Public Service (15%)

Available Funding

Approximately \$2,000,000 Approximately \$1,100,000

Special consideration will be given to Public Service Activities in Neighborhood Revitalization Strategy Areas (NRSA's).

Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations' homeownership needs, and leverage HOME funds with other funding sources.

Projects

Construction/Rehabilitation of Homebuyer Units (non-CHDO)
Construction/Rehabilitation of Homebuyer Units (CHDO)

Available Funding

Approximately \$500,000 Approximately \$350,000

TO APPLY FOR FUNDING, APPLICANTS MUST PICK UP THEIR APPLICATION MATERIAL ON THE FOLLOWING:

Community Development Block Grant (CDBG)

(for Non-Homeless Service Providers)
Friday, January 13, 2023
9:00 a.m. - 11:00 a.m.
One Government Center (1st Floor Lobby)
640 Jackson Street
Toledo, OH 43604

Emergency Solutions Grant (ESG)

(for Homeless Service Providers)
Friday, January 13, 2023
1:30 p.m. - 3:30 p.m.
One Government Center (1st Floor Lobby)
640 Jackson Street
Toledo, OH 43604

Open office hours will be available for CDBG general questions for <u>NEW APPLICANTS ONLY</u> as follows:

Wednesday, January 25, 2023, 10:00 a.m. - 2:00 p.m. Department of Housing and Community Development One Government Center, Suite 1800 Downtown Toledo, Jackson & Erie Streets

*NOTE: The applicant's CDBG application must be completed prior to the open office session on Wednesday, January 25, 2023.

CDBG Application Zoom Training

Thursday, January 26, 2023, 10:00 a.m. - 12:00 p.m.

Zoom Link: https://toledo-oh-gov.zoom.us/j/89789982042

ESG Application Zoom Training

Friday, January 27, 2023, 10:00 a.m. - 12:00 p.m.

Zoom Link: https://toledo-oh-gov.zoom.us/j/84300202052

HOME NOFA Workshop

Wednesday, January 25, 2023, 10:00 a.m. - 11:30 a.m. Zoom Link: https://toledo-oh-gov.zoom.us/j/83703154523

THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS FRIDAY, FEBRUARY 10, 2023 AT 4:45 P.M.

THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS FRIDAY, FEBRUARY 10, 2023 AT 4:45 P.M.

COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOMGRANTS

FOR CDBG/ESG: For additional information, please contact Monica Brown, Administrative Analyst IV, at monica.brown@toledo.oh.gov.

FOR HOME: For additional information, please contact Tiffanie McNair, Housing Commissioner, at tiffanie.mcnair@toledo.oh.gov.

The City of Toledo supports the provisions of the Americans with Disabilities Act. If you would like to request a reasonable accommodation, please contact the Office of Diversity and Inclusion ADA coordinator at (419) 245-1198 or submit a request online at toledo.oh.gov/ada.

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PUBLIC NOTICE

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2023 Program Year (Luly ). 2023 - June 30, 2024).

CDBG applications will be accepted with a funding priority for the following programs/activities Available Funding Housing Preservation

Approximately $2,000,000

Public Service (15%)

Approximately $1,100,000

Special consideration will be given to Public Service Activities in Neighborhood Revitalization Strategy Areas (NRSA's).

Eligible applicants: 501, (c), 3 organizations of the proposition and some consideration will applied to the programment of the consideration will be given to Public Service Activities in Neighborhood Revitalization Strategy Areas (NRSA's).
Industrial interpolations (INRSA's).
Eligible applications: 501, (c). 3 organizations, other nonprofits and government agencies.
HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable, and special populations' homeownership needs, and leverage HOME funds with other funding sources.

Projects/Available Funding Construction/Rehabilitation of Homebuyer Units (CHDO)
Approximately $350,000
Construction/Rehabilitation of Homebuyer Units (CHDO)
Approximately $350,000
TO APPLY FOR FUNDING, APPLICATION
MATERIAL, ON THE FOLLOWING;
Community Development Block Grant (CDBG)
(for Non-Homeless Service Providers)
Friday, January 13, 2023
9.00 a.m. - 11:00 a.m.
One Government Center (1st Floor Lobby)
640 Jackson Street
Toledo, OH 43604
Emergency Solutions Grant (ESG)
(for Homeless Service Providers)
Friday, January 13, 2023
1:30 p.m. - 3:30 p.m.
One Government Center (1st Floor Lobby)
640 Jackson Street
Toledo, OH 43604
Open office hours will be available for CDBG general questions for NEW
APPLICANTS ONLY as follows:
Wednesday, January 25, 2023,
10:00 a.m. - 2:00 p.m.
Department of Housing and Community Development
One Government Center, Suite 1800
Downtown, Toledo,
Jackson & Erle Streets
*NOTE: The applicant's CDBG application must be completed prior to the open office session on Wednesday, January 25, 2023;
CDBG Application Zoom Training
Thursday, January 26, 2023, 10:00 a.m. - 12:00 p.m.
Zeon Link: https://loledo-oh-
                              (NRSA's).
Eligible applicants: 501, (c) 3 organizations, other nonprofits and government
               tion must be completed prior to the open office session on Wednesday, January 25, 2023.
CDBG Application Zoom Training Thursday, January 26, 2023, 10.00 a.m., 12.00 p.m. Zoom Unk: https://loledo-ohgov.zoom.us//89789982042

ESG Application Zoom Training Friday, January 27, 2023, 10.00 a.m., 12.00 p.m. Zoom Unk: https://loledo-ohgov.zoom.us//84300202052

HOME NOFA Workshop
Wednesday, January 25, 2023, 10.00 a.m., 11:30 a.m., Zoom Unk: https://loledo-oh-gov.zoom.us//84300202052

HOME NOFA Workshop
Wednesday, January 25, 2023, 10.00 a.m., 11:30 a.m., Zoom Unk: https://loledo-oh-gov.zoom.us//83703154923

THE DEADLINE FOR SUBMITTING COBAND ESG APPLICATIONS IS FRIDAY, FEBRUARY 10, 2023 AT 4:45 P.M., THE. DEADLINE FOR SUBMITTING THE HOME, APPLICATIONS MUST BE-SUBMITTED THROUGH ZOOMGRANIS FOR COBO/ESG, FOR: additional, information, please contact Tilfonie McNair, Housing, Commissioner, at Hiffinie, manical, formation, please contact Tilfonie McNair, Housing Commissioner, at Hiffinie, manical, some other accommodition, please contact Tilfonie McNair, Housing Commissioner, at Hiffinie, manical to ledado.hgov.

The City of Toledo supports the provisions of the Americans with Disbuilliles Act. If you would like to request a reasonable accommodition, please contact tilfonie manical accom
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THE TOLEDO JOURNAL

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PUBLIC NOTICE

PUBLIC NOTICE

PUBLIC NOTICE

PUBLIC NOTICE

The City of Toledo appounces the availability of Jederal Jurding for Community Development Block Grant (ODBG), Emergency Sciulions Grant (ESG), and HOME Investment Partnetships Program (HOME) for the 2023 Program Year (July 1, 2023 - Auto 30, 2024).

CDBG applications will be accepted with a funding priority for the following programs/activities:

Programs/Activities Housing Preservation Public Service (15%) Available Funding Approximately \$2,000,000 Approximately \$1,100,000

Epocial consideration will be given to Public Service Activities in Neighborhood Revitalization Strategy Areas (NRSA's).

: Eligible applicants: 601 (o) 3 organizations; other nonprofits and government agencies:

HOME applications will be accepted from certified tilly of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's blood and accept populations homeownership needs, and layorage HOME funds with office funding sources.

Projects

Construction/Rehabilitation of Homeboyer Units (non-OHDO) Construction/Rehabilitation of Homeboyer Units (OHDO)

Available Funding Approximately \$500,000 Approximately \$350,000

TO APPLY FOR FUNDING APPLICANTS MUST FICK UP THEIR APPLICATION MATERIAL.

Community Development Block Grant (CDEG) (for Non-Homeless Scivico Providers) Friday, January 13, 2023 9:00 a.m. = 11:00 a.m. One Government Center (1st Floor Lobby) 640 Jackson Street Toledo, OH 45604

Emergency Solutions Grant (ESS) (for Homeless Service Providers) Friday, January 13, 2023 130 p.m. - 330 p.m. 'One Government Center (1st Floor Lobby) 640 Jackson Street Toledo, OH 43504

Open office hours will be available for COBE general questions for NEW APPLICANTS ONLY as

Wednesday, January 25, 2023; 10:00 a.m. - 2:00 p.m. Department of Housing and Community Development One Government Canter, Sulte 1800 Downtown Toledo, Jackson & Erie Streets

"NOTE: The applicants CDBG application must be completed prior to the open office session on Wednesday, January 25, 2023,

CDBG Application Zoom Training Thursday, January 26, 2023, 10:00 a.m. - 12:00 p.m. Zoom Link: https://toledo-ch-gov.zoom.us/j/88785982042

<u>ESG Application Zoom Training</u> Friday, January 27, 2023, 10:00 a.m. - 12:00 p.m. Zoom Link: https://ioledo-chi.gov.zoom.us//84300202052

<u>HOME NOFA Workshop</u> Wednesday, January 25, 2023, 10,00 a.m. - 11:50 a.m. Zoom Link: <u>https://toledo-oh-povzcom.us/p83703154523</u>

THE DEADLINE FOR SUBMITTING COBG AND ESG APPLICATIONS IS PRIDAY, FEBRUARY 10, 2023 AT 1/45 P.M.

THE DÉADLINE FOR SUBMITTING THE HOME APPLICATION IS: FRIDAY, FEBRUARY 10: 2023 AT 3:46 R.M.

COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOMSRANTS

FOR COBG/ESO: For edditlorial Information; please contact Montra Ecolor, Administrative Analyst IV, at tronica brown alpledo ch gór.

FOR HOME: For additional information, please contact Tidenie MeMan, Housing Commissioner, at titleme monal/pridicto of gov.

The City of Toleco suppons the grovelone of the Americans with Disabilities Act. Tryou would like to request a Teasanable accommodation, please contact the Office of Diversity and Inclusion ADA coordinator of [4]8) 245, 4108 or submitte request online at <u>rectio als governe</u>.

PUBLIC NOTICE

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2023 Program Year (July 1, 2023 - June 30, 2024).

CDBG applications will be accepted with a funding priority for the following programs/activities:

Programs/Activities
Housing Preservation
Public Service (15%)

Available Funding
Approximately \$2,000,000
Approximately \$1,100,000

Special consideration will be given to Public Service Activities in Neighborhood Revitalization Strategy Areas (NRSA's).

Elígible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations! homeownership needs, and leverage HOME funds with other funding sources.

Projects

Construction/Rehabilitation of Homebuyer Units (non-CHDO)
Construction/Rehabilitation of Homebuyer Units (GHDO).

Available Funding
Approximately \$500,000
Approximately \$350,000

TO APPLY FOR FUNDING, APPLICANTS MUST PICK UP THEIR APPLICATION MATERIAL ON THE FOLLOWING:

Community Development Block Grant (CDBG) (for Non-Homeless Service Providers) Friday, January 13, 2023 9:00 a.m. - 11:00 a.m. One Government Center (1st Floor Lobby) 640 Jackson Street Toledo, OH 43604

Emergency Solutions Grant (ESG) (for Homeless Service Providers) Friday, January 13, 2023 1430 p.m., +3:30 p.m. One Government Center (1st Floor Lobby) 640 Jackson Street Toledo, OH43604

Open office hours will be available for CDBG general questions for NEW APPLICANTS ONLY as follows:

Wednesday, January 25, 2023, 10:00 a.m. - 2:00 p.m. Department of Housing and Community Development One Government Center, Suite 1800 Downtown Toledo, Jackson & Ette Streets

*<u>NOTE</u>: The applicant's CDBC; application must be completed prior to the open office session on Wednesday, January 25, 2023.

<u>CDBG Application Zoom Training</u> Thursday, January 26, 2023, 10:00 a.m. - 12:00 p.m. Zoom Link: https://ioledo-oh-gov.zoom.us/j/89789982042

ESG Application Zoom Training
Friday, January 27, 2023, 10:00 a.m. - 12:00 p.m.
Zoom Link: https://toledo-ph-gov.zoom.us/i/84300202052

HOME NOFA Workshop Wednesday, January 25, 2023, 10:00 a.m. -11:30 a.m. Zoom Link: https://foledo.oh-gov.zoom.us/i/83703154523

THE DEADLINE FOR SUBMITTING COBG AND ESG APPLICATIONS IS FRIDAY, FEBRUARY 10, 2023 AT 4:46 P.M.

THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS FRIDAY, FEBRUARY 10, 2023 AT 4:45 P.M.

COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOM GRANTS

FOR CDBG/ESG; For additional information, please contact Motifica Brown, Administrative Adalyst IV, at monica brown@toledo.oh.gov.

FOR HOME: For additional information, please contact Tiffanie McNaîr, Housing Commissioner, at iffanie monair@toledo.oh.gov.

The City of Toledo supports the provisions of the Americans with Disabilities Act. If you would like to request a reasonable accommodation, please contact the Office of Diversity and Inclusion ADA coordinator at (419) 245-1198 or submit a request online at toledo of gov/ada.

Brown, Monica

From: Sent:

To:

Brown, Monica

Wednesday, November 23, 2022 8:41 AM

abdul.hamadeh@unitedwaytoledo.org; annebauman@compassionhealthtoledo.org;

anneruch@gmail.com; antduran8213@gmail.com; aparlet@ecdi.org;

ArringtL@co.lucas.oh.us; awelch@ecdi.org; believecenter@gmail.com;

carol.gray@toledogrows.org; cbishop@tlchb.org; chuckp@auroraprojectinc.org; cjamato@gmail.com; dalexander@familyhousetoledo.org; dargatza@co.lucas.oh.us;

DeniseF@auroraprojectinc.org; dgray@nwtoledo.org; dhawkins@toledofhc.org;

dpeluso@familyhousetoledo.org; EAST TOLEDO FAMILY CENTER;

eellis@toledodesigncollective.org; elaina@believecenter.org;

emcpartland@mvhabitat.org; eod.sqacc@gmail.com; estanbery@toledofhc.org; frankt@co.lucas.oh.us; gcommu8708@bex.net; grantsadministrator@tlchb.org;

grantwriter@spcc-toledo.org; gthomas@toledofhc.org; hzeller@lucasmha.org;

ikinney@ecdi.org; jacksonv@co.lucas.oh.us; janeltate@gmail.com; jb_sqacc@yahoo.com;

jblack@pathwaytoledo.org; jcintronvega@lucasmha.org; jhabib@spcc-toledo.org;

ijacobs@lfhtoledo.org; jjarrett@theartscommission.org; jmpinskey@gmail.com;

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kachinger@mvhabitat.org; kbond@lucasmha.org; kclark@pathwaytoledo.org;

Ibanks@Ifhtoledo.org; LEGAL AID OF WESTERN OHIO, INC.; Ipengov@spcc-toledo.org;

lschoen@lucasmha.org; lweller@lawolaw.org; mariemflannery@toledofhc.org;

matt.morris@unitedwaytoledo.org; mburda@lfhtoledo.org;

mculling@theartscommission.org; mebadik1956@gmail.com;

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mindy@seagatefoodbank.org; mjacomet@nwtoledo.org; mjarret@aol.com; MLK

KITCHEN FOR THE POOR, INC; mlk.kitchen@att.net; mmcintyre@mvhabitat.org; msachs@nwtoledo.org; mwolff_etsac@yahoo.com; nancy.elzinga@gmail.com;

NEIGHBORHOOD HEALTH ASSOCIATION, IN; ntaylor@nwtoledo.org; pageelaine1

@aol.com; paul@toledodesigncollective.org; rgagnon@lucasmha.org;

rjordan@pathwaytoledo.org; rpetroff@lfhtoledo.org; rstone@ablelaw.org;

ryan.bunch@unitedwaytoledo.org; scrabtree@ablelaw.org; sfriedman@toledofhc.org;

 $stokest@co.lucas.oh.us;\ tkroma@nwtoledo.org;\ TOLEDO\ SEAGATE;$

tpace @family house to ledo.org; tpence @lawolaw.org; trish @seagate foodbank.org;

vhill@lucasmha.org; vmartinez@lawolaw.org; Welch,David;

wendy.pestrue@unitedwaytoledo.org; NEIGHBORWORKS TOLEDO REGION;

vvonne.dubielak@toledogrows.org; Zgodzinkski, Eric

Bonds, Bonita; Phillips, Regina; Harris, Morlon; Thorpe, Susan; Williams, Darlene

PY-2023 CDBG/ESG/HOME Application Public Notice

PY2023 Application Public Notice final 11182022.pdf

Importance:

Attachments:

Cc:

Subject:

High

Good morning,

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2023 Program Year (July 1, 2023 - June 30, 2024).

Please see the attached public notice for information on applying for funds.

Monica Brown

Administrative Analyst IV **Department of Housing and Community Development**

monica.brown@toledo.oh.gov **office** 419-245-1617 One Government Center, Suite 1800 Toledo, Ohio 43604

→ toledo.oh.gov



PUBLIC NOTICE

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2023 Program Year (July 1, 2023 - June 30, 2024).

CDBG applications will be accepted with a funding priority for the following programs/activities:

Programs/Activities

Housing Preservation Public Service (15%) Available Funding

Approximately \$2,000,000 Approximately \$1,100,000

Special consideration will be given to Public Service Activities in Neighborhood Revitalization Strategy Areas (NRSA's).

Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations' homeownership needs, and leverage HOME funds with other funding sources.

Projects

Construction/Rehabilitation of Homebuyer Units (non-CHDO)
Construction/Rehabilitation of Homebuyer Units (CHDO)

Available Funding

Approximately \$500,000 Approximately \$350,000

TO APPLY FOR FUNDING, APPLICANTS MUST PICK UP THEIR APPLICATION MATERIAL ON THE FOLLOWING:

Community Development Block Grant (CDBG)

(for Non-Homeless Service Providers)
Friday, January 13, 2023
9:00 a.m. - 11:00 a.m.
One Government Center (1st Floor Lobby)
640 Jackson Street
Toledo, OH 43604

Emergency Solutions Grant (ESG)

(for Homeless Service Providers)
Friday, January 13, 2023
1:30 p.m. - 3:30 p.m.
One Government Center (1st Floor Lobby)
640 Jackson Street
Toledo, OH 43604

Open office hours will be available for CDBG general questions for <u>NEW APPLICANTS ONLY</u> as follows:

Wednesday, January 25, 2023, 10:00 a.m. - 2:00 p.m. Department of Housing and Community Development One Government Center, Suite 1800 Downtown Toledo, Jackson & Erie Streets

*NOTE: The applicant's CDBG application must be completed prior to the open office session on Wednesday, January 25, 2023.

CDBG Application Zoom Training

Thursday, January 26, 2023, 10:00 a.m. - 12:00 p.m.

Zoom Link: https://toledo-oh-gov.zoom.us/j/89789982042

ESG Application Zoom Training

Friday, January 27, 2023, 10:00 a.m. - 12:00 p.m.

Zoom Link: https://toledo-oh-gov.zoom.us/j/84300202052

HOME NOFA Workshop

Wednesday, January 25, 2023, 10:00 a.m. - 11:30 a.m. Zoom Link: https://toledo-oh-gov.zoom.us/j/83703154523

THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS FRIDAY, FEBRUARY 10, 2023 AT 4:45 P.M.

THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS FRIDAY, FEBRUARY 10, 2023 AT 4:45 P.M.

COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOMGRANTS

<u>FOR CDBG/ESG</u>: For additional information, please contact Monica Brown, Administrative Analyst IV, at <u>monica.brown@toledo.oh.gov</u>.

<u>FOR HOME</u>: For additional information, please contact Tiffanie McNair, Housing Commissioner, at tiffanie.mcnair@toledo.oh.gov.

The City of Toledo supports the provisions of the Americans with Disabilities Act. If you would like to request a reasonable accommodation, please contact the Office of Diversity and Inclusion ADA coordinator at (419) 245-1198 or submit a request online at toledo.oh.gov/ada.



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News

PUBLIC NOTICE: Availability of Federal Funding for CDBG, ESG, and HOME ARP

🛱 Wednesday, November 23, 2022

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2023 Program Year (July 1, 2023 -June 30, 2024).

Community Development Block Grant (CDBG)

CDBG applications will be accepted with a funding priority for the following programs/activities:

Programs/Activities

Available Funding

Housing Preservation

Approximately \$2,000,000

Public Service (15%)

Approximately \$1,100,000

Additional CDEG information

- Special consideration will be given to Public Service Activities in Neighborhood Revitalization Strategy Areas (NRSA's).
- Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

Completed CDBG/ESG applications must be submitted through ZoomGrants. For additional information, please contact Monica Brown, Administrative Analyst IV, at monica.brown@toledo.oh.gov. The deadline for submitting CDBG and ESG applications is Friday, February 10, 2023 at 4:45 p.m.

HOME Investment Partnerships Program (HOME)

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations' homeownership needs, and leverage HOME funds with other funding sources.

Projects

Available Funding

Construction/Rehabilitation of Homebuyer

Approximately

Units

\$500,000

(non-CHDO)

Construction/Rehabilitation of Homebuyer

Approximately

Units (CHDO)

\$350,000

Completed applications must be submitted through ZoomGrants. For additional information, please contact Tiffanie McNair, Housing Commissioner, at tiffanie.mcnair@toledo.oh.gov. The deadline for submitting the HOME application is Friday, February 10, 2023 at 4:45 p.m.

Apply for funding

Applicants must pick up their application materials at following location during the designated times:

Friday, January 13, 2023

One Government Center (1st Floor Lobby) 640 Jackson St. Toledo, OH 43604

9 a.m. - 11 a.m.

Community Development Block Grant (CDBG) For Non-Homeless Service Providers.

1:30 p.m. - 3:30 p.m.

Emergency Solutions Grant (ESG) For Homeless Service Providers

Open office hours will be available for CDBG general questions for NEW APPLICANTS ONLY as follows:

Wednesday, January 25, 2023

10:00 a.m. - 2:00 p.m. Department of Housing

Department of Housing and Community Development One Government Center, Suite 1800

640 Jackson St.

Toledo, OH 43604

The applicant's CDBG application must be completed prior to the open office session on Wednesday, January 25, 2023.

Application Zoom Trainings
HOME NOFA

- Wednesday, January 25, 2023
- 10 11:30 a.m.
- Click here to join

CD8G training

- Thursday, January 26, 2023
- 10 a.m. 12 p.m.
- Click here to join

ESG Training

- 📆 Friday, January 27, 2023
- 10 a.m. 12 p.m.
- Click here to join

The City of Toledo supports the provisions of the Americans with Disabilities Act. If you would like to request a reasonable accommodation, please contact the Office of Diversity and Inclusion ADA coordinator at (419) 245-1198 or submit a request online at toledo.oh.gov/ada.



CONTACT

POLICE FIRE AND RESCUE HEALTH DEPARTMENT

TARTA

One Government Center 640 Jackson Street, Toledo, OH 43604

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Request a service 👒

Brown, Monica

From:

Sent: To: Thorpe, Susan

Tuesday, January 3, 2023 12:23 PM

abdul. hamadeh @united way to ledo. org; annebauman @compassion health he

anneruch@gmail.com; antduran8213@gmail.com; aparlet@ecdi.org;

ArringtL@co.lucas.oh.us; awelch@ecdi.org; believecenter@gmail.com;

carol.gray@toledogrows.org; cbishop@tlchb.org; chuckp@auroraprojectinc.org; cjamato@gmail.com; dalexander@familyhousetoledo.org; dargatza@co.lucas.oh.us; DeniseF@auroraprojectinc.org; dgray@nwtoledo.org; dhawkins@toledofhc.org;

dpeluso@familyhousetoledo.org; EAST TOLEDO FAMILY CENTER; eellis@toledodesigncollective.org; elaina@believecenter.org;

emcpartland@mvhabitat.org; eod.sqacc@gmail.com; estanbery@toledofhc.org; frankt@co.lucas.oh.us; gcommu8708@bex.net; grantsadministrator@tlchb.org; grantwriter@spcc-toledo.org; gthomas@toledofhc.org; hzeller@lucasmha.org;

ikinney@ecdi.org; jacksonv@co.lucas.oh.us; janeltate@gmail.com; jb_sqacc@yahoo.com; jblack@pathwaytoledo.org; jcintronvega@lucasmha.org; jhabib@spcc-toledo.org; jjacobs@lfhtoledo.org; jjarrett@theartscommission.org; jmpinskey@gmail.com;

jmueller@pathwaytoledo.org; jodig@etfc.org; jswiech@gallonlaw.com;

kachinger@mvhabitat.org; kbond@lucasmha.org; kclark@pathwaytoledo.org;

Ibanks@Ifhtoledo.org; LEGAL AID OF WESTERN OHIO, INC.; Ipengov@spcc-toledo.org;

lschoen@lucasmha.org; lweller@lawolaw.org; mariemflannery@toledofhc.org;

matt.morris@unitedwaytoledo.org; mburda@lfhtoledo.org; mculling@theartscommission.org; mebadik1956@gmail.com;

mfolk@theartscommission.org; mhart@tlchb.org; mhoffman@nhainc.org;

michaelj@auroraprojectinc.org; mike.andersonhsi@gmail.com;

mindy@seagatefoodbank.org; mjacomet@nwtoledo.org; mjarret@aol.com; MLK KITCHEN FOR THE POOR, INC; mlk.kitchen@att.net; mmcintyre@mvhabitat.org; msachs@nwtoledo.org; mwolff_etsac@yahoo.com; nancy.elzinga@gmail.com; NEIGHBORHOOD HEALTH ASSOCIATION, IN; ntaylor@nwtoledo.org; pageelaine1

@aol.com; paul@toledodesigncollective.org; rgagnon@lucasmha.org; rjordan@pathwaytoledo.org; rpetroff@lfhtoledo.org; rstone@ablelaw.org;

ry an. bunch @united way to ledo. org; scrabtree @able law. org; sfried man @toledofhc. org;

tpace@familyhousetoledo.org; tpence@lawolaw.org; trish@seagatefoodbank.org;

stokest@co.lucas.oh.us; tkroma@nwtoledo.org; TOLEDO SEAGATE;

vhill@lucasmha.org; vmartinez@lawolaw.org; Welch,David;

wendy.pestrue@unitedwaytoledo.org; NEIGHBORWORKS TOLEDO REGION;

yvonne.dubielak@toledogrows.org; Zgodzinkski, Eric

Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene

FW: Press Release for the 2023-2024 CDBG/ESG/HOME Application

Media Advisory 2023-2024 Mandatory Meeting Application.pdf

Importance: High

Good afternoon,

Cc:

Subject:

Attachments:

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2023 Program Year (July 1, 2023 - June 30, 2024).

To apply for funding, applicants <u>MUST</u> pick up their application material. Please see the attached Media Advisory for application pickup dates/times.

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)
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Visit us at: www.toledo.oh.gov



DECEMBER 30, 2022

Amy Voigt
Communications Specialist
amy.voigt@toledo.oh.gov
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Director
gretchen.debacker@toledo.oh.gov
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toledo.oh.gov

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City of Toledo

Department of Housing and Community Development 2023-2024 Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and HOME Investment Partnerships Program (HOME) Application Availability

The City of Toledo announces the availability of federal funds for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnership Program (HOME) for the 2023 Program Year (July 1, 2023 - June 30, 2024).

CDBG applications will be accepted with a funding priority for the following programs/activities:

Programs/Activities	Available Funding
Housing Preservation	Approximately \$2,000,000
Public Services (15%).	Approximately \$1,100,000

Special consideration will be given to Public Services Activities in Neighborhood Revitalization Strategy Areas (NRSA's).

Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies (Government Entities/Quasi-Government Agencies (Not-For-Profit)).

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations homeownership needs, and leverage HOME funds with other funding sources.



Amy Voigt

Communications Specialist amy.voigt@toledo.oh.gov cell 419-389-2260

Gretchen DeBacker

Director gretchen.debacker@toledo.oh.gov cell 419-297-7210

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Projects

Construction/Rehabilitation of Homebuyer Units (non-CHDO)

Maximum Award

Approximately \$500,000

Construction/Rehabilitation of Homebuyer Units (CHDO)

Approximately \$350,000

TO APPLY FOR FUNDING, APPLICANTS MUST PICK UP THEIR APPLICATION MATERIAL ON THE FOLLOWING:

Community Development Block Grant (CDBG)

(for Non-Homeless Service Providers)
Friday, January 13, 2023
9:00 a.m. - 11:00 a.m.
One Government Center (1st Floor Lobby)
640 Jackson Street

Emergency Solutions Grant (ESG)

Toledo, OH 43604

(for Homeless Service Providers)
Friday, January 13, 2023
1:30 p.m. - 3:30 p.m.
One Government Center (1st Floor Lobby)
640 Jackson Street
Toledo, OH 43604

Open office hours will be available for CDBG general questions for <u>NEW APPLICANTS ONLY</u> as follows:

Wednesday, January 25, 2023, 10:00 a.m. - 2:00 p.m. Department of Housing and Community Development One Government Center, Suite 1800 Downtown Toledo, Jackson & Erie Streets

*NOTE: The applicant's CDBG application must be completed prior to the open office session on Wednesday, January 25, 2023.



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amy.voigt@toledo.oh.gov cell 419-389-2260

Gretchen DeBacker

Director

gretchen,debacker@toledo.oh.gov

Marketing and Communications

One Government Center Suite 2200 Toledo, Ohio 43604

⇒ toledo.oh.gov

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CDBG Application Zoom Training

Thursday, January 26, 2023 at 10:00 a.m. - 12:00 p.m.

Zoom Link: https://toledo-oh-gov.zoom.us/j/89789982042

ESG Application Zoom Training

Friday, January 27, 2023 at 10:00 a.m. - 12:00 p.m.

Zoom Link: https://toledo-oh-gov.zoom.us/j/84300202052

HOME NOFA Workshop

Wednesday, January 25, 2023, at 10:00 a.m. 11:30 a.m.

Zoom Link: https://toledo-oh-gov.zoom.us/j/83703154523

THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS FRIDAY, FEBRUARY 10, 2023 AT 4:45 P.M.

THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS FRIDAY, FEBRUARY 10, 2023 AT 4:45 P.M.

COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOMGRANTS

<u>FOR CDBG/ESG</u>: For additional information, please contact Monica Brown, Administrative Analyst IV, at <u>monica.brown@toledo.oh.gov</u>.

FOR HOME: For additional information, please contact Tiffanie McNair, Housing Commissioner, at tiffanie.mcnair@toledo.oh.gov.

The City of Toledo supports the provisions of the Americans with Disabilities Act. If you would like to request a reasonable accommodation, please contact the Office of Diversity and Inclusion ADA coordinator at (419) 245-1198 or submit a request online at toledo.oh.gov/ada.



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2023-2024 Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and HOME Investment Partnerships Program (HOME) Application Availability

苗 Friday, December 30, 2022

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CDBG and ESG

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HOME

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Projects Maximum Awarded

Construction/Rehabilitation of Homebuyer Units Approximately \$500,000

(non-CHDO)

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(CHDO)

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Downtown Toledo, Jackson & Erie Streets

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CDBG Application Zoom Training

Thursday, January 26, 2023 at 10 a.m. - 12 p.m. Location: Zoom <u>Click here to attend</u>

ESG Application Zoom Training

Friday, January 27, 2023 at 10 a.m. - 12 p.m. Location: Zoom Click here to attend

HOME NOFA Workshop

Wednesday, January 25, 2023, at 10 a.m. 11:30 a.m. Location: Zoom ${\it Click here to attend}$

Application Deadlines

- The deadline for submitting CDBG and ESG applications is Friday, February 10, 2023 at 4:45 p.m.
- The deadline for submitting the HOME application is Friday, February 10, 2023 at 4:45 p.m.
- Completed applications must be submitted through zoomgrants.

FOR CDBG/ESG: For additional information, please contact Monica Brown, Administrative Analyst IV, at monica.brown@toledo.oh.gov.

FOR HOME: For additional information, please contact Tiffanie McNair, Housing Commissioner, at tiffanie.mcnair@toledo.oh.gov.

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PUBLIC NOTICE

2023-2024 ONE-YEAR ACTION PLAN

To all interested agencies, groups, and persons:

The City of Toledo is seeking comments on its **Draft** July 1, 2023 – June 30, 2024 One-Year Action Plan to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 17, 2023. The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2023-2024 program year. The Action Plan provides a description of the activities to be undertaken when using these resources and the expected results of those activities. Also, the Action Plan depicts a geographic distribution of assistance including Neighborhood Revitalization Strategy Areas (NRSAs), special needs activities, general and public housing actions, and activities specific to the 2023 49th Year Community Development Block Grant (CDBG), 37th Year Emergency Solutions Grant (ESG), 32nd Year HOME Investment Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP) (if applicable), and the 2020 Lead-Based Paint and Healthy Homes Grant. In addition, the Plan will contain HUD-required certifications, as well as a summary of the community input received at the public hearings regarding the Action Plan.

The **Draft** One-Year Action Plan will be available for review beginning **Wednesday**, **March 22**, **2023**, 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

Office of the Mayor

One Government Center, 22nd Floor

Downtown Toledo, Jackson & Erie Streets

website: https://toledo.oh.gov/government/mayor

Clerk of Council

One Government Center, 21st Floor

Downtown Toledo, Jackson & Erie Streets

website: https://toledo.oh.gov/government/city-council/

The Fair Housing Center

326 N. Erie Street

Toledo, Ohio 43604

website: www.toledofhc.org

Lucas Metropolitan Housing

424 Jackson Street

Toledo, Ohio 43604

website: www.lucasmha.org

Toledo Lucas County Homelessness Board

1220 Madison Avenue

Toledo, Ohio 43604

website: www.endinghomelessnesstoledo.org

Toledo-Lucas County Public Library

325 Michigan Street

Toledo, Ohio 43604

website: www.toledolibrary.org

Lucas Co. Board of Developmental Disabilities

1154 Larc Lane

Toledo, Ohio 43614

website: www.lucasdd.info

Public Hearings on the Draft One-Year Action Plan are scheduled as follows:

Thursday, March 23, 2023, 5:30 p.m. by Virtual Hearing:

Virtual Link: https://toledo-oh-gov.zoom.us/j/85826018584

Passcode: 530143 Or one tap mobile:

US: +1408-961-3927,,85826018584#,,,,*530143# or 1855-758-1310,,85826018584#,,,,*530143# (Toll Free)

Or Telephone:

Dial (for higher quality, dial a number based on your current location):

US: +1 408-961-3927 or 1 855-758-1310 (Toll Free)

Webinar ID: 858 2601 8584

Passcode: 530143

International numbers available: https://toledo-oh-gov.zoom.us/u/kcb6CLkrBi

Thursday, March 30, 2023, 5:30 p.m. by Virtual Hearing:

Virtual Link: https://toledo-oh-gov.zoom.us/j/82912448121

Passcode: 844885 Or one tap mobile:

US: +1408-961-3927,,82912448121#,,,,*844885# or 1855-758-1310,,82912448121#,,,,*844885# (Toll Free)

Or Telephone:

Dial (for higher quality, dial a number based on your current location):

US: +1 408-961-3927 or 1 855-758-1310 (Toll Free)

Webinar ID: 829 1244 8121

Passcode: 844885

International numbers available: https://toledo-oh-gov.zoom.us/u/kdEZ48X4uU

The City of Toledo will also receive comments from the public in writing beginning Wednesday, March 22, 2023 through Thursday, April 20, 2023, at the following address:

CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2023-2024 ONE-YEAR ACTION PLAN
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

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March 1, 2023

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PUBLIC NOTICE 2023-2024 ONE-YEAR ACTION PLAN

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The Draft One-Year Action Plan will be available for review beginning Wednesday, March 22, 2023, on the website of the following

Lucas Metropolitan Housing 424 Jackson Street

website: www.lucasmha.org

Toledo Lucas County Homelessness Board

website: www.endinghomelessnesstoledo.org Toledo-Lucas County Public Library

Lucas Co. Board of Developmental Disabilities

Toledo, Ohio 43604

1220 Madison Avenue

Toledo, Ohio 43604

325 Michigan Street

website: www.toledolibrary.org

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1154 Larc Lane Toledo, Ohio 43614

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

 $\label{public Hearings} \textbf{Public Hearings on the } \textbf{D} \textbf{raft One-Year Action Plan are scheduled as follows:}$

Thursday, March 23, 2023, 5:30 p.m. by Virtual Hearing:

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Or one tap mobile:

US:+1408-961-3927,,85826018584#,,,,*530143# or 1855-758-1310,,85826018584#,,,,,*530143# (TollFree)

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(Toll Free)
Webingt ID: 858-2601-8584

Webinar ID: 858 2601 8584 Passcode: 530143 International numbers available: https://toledo-oh-gov.zoom.us/u/kcb6CLkrBi

Thursday, March 30, 2023, 5:30 p.m. by Virtual Hearing: Virtual Link: https://toledo-oh-gov.zoom.us//82912448121
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Brown, Monica

From: Sent:

To:

Thorpe, Susan

Friday, March 3, 2023 10:12 AM

areid@ctwtoledo.org; Ebony Robinson, Director; rmosley@lucasmha.org; tjsoros@aol.com; tom@waniewski.com; annebbert@cherrystreetmission.org; spiller@cherrystreetmission.org; abarrett@cherrystreetmission.org; srayford@cherrystreetmission.org; Shane Douglas; Rebecca Shields; Tyson Bouyack; rhunt@ecdi.org; abdul.hamadeh@unitedwaytoledo.org; annebauman@compassionhealthtoledo.org; anneruch@gmail.com; antduran8213 @gmail.com; aparlet@ecdi.org; ArringtL@co.lucas.oh.us; awelch@ecdi.org; believecenter@gmail.com; brendah etsac@yahoo.com; carol.gray@toledogrows.org; cbishop@tlchb.org; chuckp@auroraprojectinc.org; cjamato@gmail.com; dalexander@familyhousetoledo.org; DeniseF@auroraprojectinc.org; dgray@nwtoledo.org; dhawkins@toledofhc.org; dpeluso@familyhousetoledo.org; EAST TOLEDO FAMILY CENTER; eellis@toledodesigncollective.org; elaina@believecenter.org; emcpartland@mvhabitat.org; eod.sqacc@gmail.com; estanbery@toledofhc.org; frankt@co.lucas.oh.us; gcommu8708@bex.net; grantsadministrator@tlchb.org; grantwriter@spcc-toledo.org; gthomas@toledofhc.org; hzeller@lucasmha.org; ikinney@ecdi.org; jacksonv@co.lucas.oh.us; janeltate@gmail.com; jb_sqacc@yahoo.com; jblack@pathwaytoledo.org; jcintronvega@lucasmha.org; jhabib@spcc-toledo.org; jjacobs@lfhtoledo.org; jjarrett@theartscommission.org; jmpinskey@gmail.com; jmueller@pathwaytoledo.org; jodig@etfc.org; jswiech@gallonlaw.com; kachinger@mvhabitat.org; kbond@lucasmha.org; kclark@pathwaytoledo.org; lbanks@lfhtoledo.org; LEGAL AID OF WESTERN OHIO, INC.; lpengov@spcc-toledo.org; lschoen@lucasmha.org; lsmigielski@nhainc.org; lweller@lawolaw.org; mariemflannery@toledofhc.org; matt.morris@unitedwaytoledo.org; mburda@lfhtoledo.org; mculling@theartscommission.org; mebadik1956@gmail.com; mfolk@theartscommission.org; mhart@tlchb.org; mhoffman@nhainc.org; michaelj@auroraprojectinc.org; mike.andersonhsi@gmail.com; mindy@seagatefoodbank.org; mjacomet@nwtoledo.org; mjarret@aol.com; MLK KITCHEN FOR THE POOR, INC; mlk.kitchen@att.net; mmcintyre@mvhabitat.org; msachs@nwtoledo.org; nancy.elzinga@gmail.com; NEIGHBORHOOD HEALTH ASSOCIATION, IN; ntaylor@nwtoledo.org; pageelaine1@aol.com; paul@toledodesigncollective.org; rgagnon@lucasmha.org; riccardi@believecenter.org; rjordan@pathwaytoledo.org; rpetroff@lfhtoledo.org; rstone@ablelaw.org; ryan.bunch@unitedwaytoledo.org; scrabtree@ablelaw.org; stokest@co.lucas.oh.us;

NEIGHBORWORKS TOLEDO REGION; yvonne.dubielak@toledogrows.org; Zgodzinkski,

Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene

tkroma@nwtoledo.org; TOLEDO SEAGATE; tpace@familyhousetoledo.org; tpence@lawolaw.org; trish@seagatefoodbank.org; vhill@lucasmha.org; vmartinez@lawolaw.org; Welch,David; wendy.pestrue@unitedwaytoledo.org;

2023-2024 One-Year Action Plan Public Notice

2023-2024 Action Plan Public Notice.doc

Importance:

Attachments:

Cc:

Subject:

High

Good morning,

The City of Toledo, Department of Housing and Community Development has scheduled two (2) public hearings on the Draft 2023-2024 One-Year Action Plan. The One-Year Action Plan includes a description of the federal funds anticipated to be received and other resources expected to be available within the City of Toledo during the 2023-2024 program year. The Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

You are invited to attend the public hearings on the One-Year Action Plan.

Public Hearings on the Draft One-Year Action Plan are scheduled as follows:

Thursday, March 23, 2023, 5:30 p.m. by Virtual Hearing:

Virtual Link: https://toledo-oh-gov.zoom.us/j/85826018584

Passcode: 530143 Or one tap mobile:

US: +1408-961-3927,,85826018584#,,,,*530143# or 1855-758-1310,,85826018584#,,,,*530143# (Toll Free)

Or Telephone:

Dial (for higher quality, dial a number based on your current location):

US: +1 408-961-3927 or 1 855-758-1310 (Toll Free)

Webinar ID: 858 2601 8584

Passcode: 530143

International numbers available: https://toledo-oh-gov.zoom.us/u/kcb6CLkrBi

Thursday, March 30, 2023, 5:30 p.m. by Virtual Hearing:

Virtual Link: https://toledo-oh-gov.zoom.us/j/82912448121

Passcode: 844885 Or one tap mobile:

US: +1408-961-3927,,82912448121#,,,,*844885# or 1855-758-1310,,82912448121#,,,,*844885# (Toll Free)

Or Telephone:

Dial (for higher quality, dial a number based on your current location):

US: +1 408-961-3927 or 1 855-758-1310 (Toll Free)

Webinar ID: 829 1244 8121

Passcode: 844885

International numbers available: https://toledo-oh-gov.zoom.us/u/kdEZ48X4uU

Please see the attached public notice for additional information.

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

2023-2024 ONE-YEAR ACTION PLAN

To all interested agencies, groups, and persons:

The City of Toledo is seeking comments on its **Draft** July 1, 2023 – June 30, 2024 One-Year Action Plan to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 17, 2023. The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2023-2024 program year. The Action Plan provides a description of the activities to be undertaken when using these resources and the expected results of those activities. Also, the Action Plan depicts a geographic distribution of assistance including Neighborhood Revitalization Strategy Areas (NRSAs), special needs activities, general and public housing actions, and activities specific to the 2023 49th Year Community Development Block Grant (CDBG), 37th Year Emergency Solutions Grant (ESG), 32nd Year HOME Investment Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP) (if applicable), and the 2020 Lead-Based Paint and Healthy Homes Grant. In addition, the Plan will contain HUD-required certifications, as well as a summary of the community input received at the public hearings regarding the Action Plan.

The Draft One-Year Action Plan will be available for review beginning Wednesday, March 22, 2023, 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

Office of the Mayor

One Government Center, 22nd Floor Downtown Toledo, Jackson & Erie Streets website: https://toledo.oh.gov/government/mayor

Clerk of Council

One Government Center, 21st Floor Downtown Toledo, Jackson & Erie Streets

website: https://toledo.oh.gov/government/city-council/

The Fair Housing Center 326 N. Erie Street Toledo, Ohio 43604

website: www.toledofhc.org

Lucas Metropolitan Housing

424 Jackson Street Toledo, Ohio 43604

website: www.lucasmha.org

Toledo Lucas County Homelessness Board

1220 Madison Avenue Toledo, Ohio 43604

website: www.endinghomelessnesstoledo.org

Toledo-Lucas County Public Library

325 Michigan Street Toledo, Ohio 43604

website: www.toledolibrary.org

Lucas Co. Board of Developmental Disabilities

1154 Larc Lane Toledo, Ohio 43614 website: <u>www.lucasdd.info</u>

Public Hearings on the **Draft** One-Year Action Plan are scheduled as follows:

Thursday, March 23, 2023, 5:30 p.m. by Virtual Hearing: Virtual Link: https://toledo-oh-gov.zoom.us/i/85826018584

Passcode: 530143
Or one tap mobile:

US: +1408-961-3927,,85826018584#,,,,*530143# or 1855-758-1310,,85826018584#,,,,*530143# (Toll Free)

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Virtual Link: https://toledo-oh-gov.zoom.us/j/82912448121

Passcode: 844885 Or one tap mobile:

US: +1408-961-3927,,82912448121#,,,,*844885# or 1855-758-1310,,82912448121#,,,,*844885# (Toll Free)

Or Telephone:

Dial (for higher quality, dial a number based on your current location):

US: +1 408-961-3927 or 1 855-758-1310 (Toll Free)

Webinar ID: 829 1244 8121

Passcode: 844885

International numbers available: https://toledo-oh-gov.zoom.us/u/kdEZ48X4uU

The City of Toledo will also receive comments from the public in writing beginning Wednesday, March 22, 2023 through Thursday, April 20, 2023, at the following address:

CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2023-2024 ONE-YEAR ACTION PLAN
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

The City of Toledo supports the provisions of the Americans with Disabilities Act. If you would like to request a reasonable accommodation, please contact the Office of Diversity and Inclusion ADA coordinator at (419) 245-1198 or submit a request online at toledo.oh.gov/ada.



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Public Notice for the 2023-2024 One Year Action Plan

Friday, March 03, 2023

The City of Toledo is seeking comments on its Draft July 1, 2023 – June 30, 2024 One-Year Action Plan to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 17, 2023. The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2023-2024 program year. The Action Plan provides a description of the activities to be undertaken when using these resources and the expected results of those activities. Also, the Action Plan depicts a geographic distribution of assistance including Neighborhood Revitalization Strategy Areas (NRSAs), special needs activities, general and public housing actions, and activities specific to the 2023 49th Year Community Development Block Grant (CDBG), 37th Year Emergency Solutions Grant (ESG), 32nd Year HOME Investment Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP) (if applicable), and the 2020 Lead-Based Paint and Healthy Homes Grant. In addition, the Plan will contain HUD-required certifications, as well as a summary of the community input received at the public hearings regarding the Action Plan.

The Draft One-Year Action Plan will be available for review beginning **Wednesday, March 22, 2023,** on the website of the following entities:

Department of Housing and Community Development

One Government Center, 18th Floor

Downtown Toledo, Jackson & Erie Streets toledo.oh.gov/housing

Lucas Metropolitan Housing

424 Jackson Street, Toledo, Ohio 43604 www.lucasmha.org

Office of the Mayor

One Government Center, 22nd Floor Downtown Toledo, Jackson & Erie Streets toledo.oh.gov/mayor

Toledo Lucas County Homelessness Board

1220 Madison Ave.
Toledo, Ohio 43604
endinghomelessnesstoledo.org

Clerk of Council

One Government Center, 21st Floor Downtown Toledo, Jackson & Erie Streets toledo.oh.gov/city-council

Toledo-Lucas County Public Library

325 Michigan St. Toledo, Ohio 43604 <u>toledolibrary.org</u>

The Fair Housing Center

326 N. Erie St. Toledo, Ohio 43604 <u>toledofhc.org</u>

Lucas Co. Board of Developmental Disabilities

1154 Larc Ln.
Toledo, Ohio 43614
<u>lucasdd.info</u>

Public Hearings on the Draft One-Year Action Plan:

Thursday, March 23, 2023, 5:30 p.m. by Virtual Hearing:

Click here to join Passcode: 530143

Or one tap mobile:

US: +1408-961-3927,,85826018584#,,,,*530143# or 1855-758-1310,,85826018584#,,,,*530143# (Toll Free)

Or Telephone:

Dial (for higher quality, dial a number based on your current location): US: +1 408-961-3927 or 1 855-758-1310 (Toll Free)

Webinar ID: 858 2601 8584

Passcode: 530143

International numbers available: https://toledo-oh-gov.zoom.us/u/kcb6CLkrBi

Thursday, March 30, 2023, 5:30 p.m. by Virtual Hearing:

Click here to join

Passcode: 844885

Or one tap mobile:

US: +1408-961-3927,,82912448121#,,,,*844885# or 1855-758-1310,,82912448121#,,,,*844885# (Toll Free)

Or Telephone:

Dial (for higher quality, dial a number based on your current location):

US: +1 408-961-3927 or 1 855-758-1310 (Toll Free)

Webinar ID: 829 1244 8121

Passcode: 844885

International numbers available: https://toledo-oh-gov.zoom.us/u/kdEZ48X4uU

The City of Toledo will also receive comments from the public in writing beginning Wednesday, March 22, 2023 through Thursday, April 20, 2023, at the following address:

City of Toledo

Department of Housing and Community Development 2023-2024 One-Year Action Plan

One Government Center, Ste 1800 Toledo, Ohio 43604

The City of Toledo supports the provisions of the Americans with Disabilities Act. If you would like to request a reasonable accommodation, please contact the Office of Diversity and Inclusion ADA coordinator at (419) 245-1198 or submit a request online at toledo.oh.gov/ada.



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One Government Center 640 Jackson Street, Toledo, OH 43604

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PRIVACY AND SECURITY BRAND GUIDE

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Brown, Monica

From: Sent:

To:

Thorpe, Susan

Monday, March 6, 2023 3:52 PM

areid@ctwtoledo.org; Ebony Robinson, Director; rmosley@lucasmha.org; tjsoros@aol.com; tom@waniewski.com; annebbert@cherrystreetmission.org; spiller@cherrystreetmission.org; abarrett@cherrystreetmission.org; srayford@cherrystreetmission.org; Shane Douglas; Rebecca Shields; Tyson Bouyack; rhunt@ecdi.org; abdul.hamadeh@unitedwaytoledo.org; annebauman@compassionhealthtoledo.org; anneruch@gmail.com; antduran8213 @gmail.com; aparlet@ecdi.org; ArringtL@co.lucas.oh.us; awelch@ecdi.org; believecenter@gmail.com; brendah_etsac@yahoo.com; carol.gray@toledogrows.org; cbishop@tlchb.org; chuckp@auroraprojectinc.org; cjamato@gmail.com; dalexander@familyhousetoledo.org; DeniseF@auroraprojectinc.org; dgray@nwtoledo.org; dhawkins@toledofhc.org; dpeluso@familyhousetoledo.org; EAST TOLEDO FAMILY CENTER; eellis@toledodesigncollective.org; elaina@believecenter.org; emcpartland@mvhabitat.org; eod.sqacc@gmail.com; estanbery@toledofhc.org; frankt@co.lucas.oh.us; gcommu8708@bex.net; grantsadministrator@tlchb.org; grantwriter@spcc-toledo.org; gthomas@toledofhc.org; hzeller@lucasmha.org; ikinney@ecdi.org; jacksonv@co.lucas.oh.us; janeltate@gmail.com; jb_sqacc@yahoo.com; jblack@pathwaytoledo.org; jcintronvega@lucasmha.org; jhabib@spcc-toledo.org; jjacobs@lfhtoledo.org; jjarrett@theartscommission.org; jmpinskey@gmail.com; jmueller@pathwaytoledo.org; jodig@etfc.org; jswiech@gallonlaw.com; kachinger@mvhabitat.org; kbond@lucasmha.org; kclark@pathwaytoledo.org; Ibanks@lfhtoledo.org; LEGAL AID OF WESTERN OHIO, INC.; lpengov@spcc-toledo.org; Ischoen@lucasmha.org; Ismigielski@nhainc.org; Iweller@lawolaw.org; mariemflannery@toledofhc.org; matt.morris@unitedwaytoledo.org; mburda@lfhtoledo.org; mculling@theartscommission.org; mebadik1956@gmail.com; mfolk@theartscommission.org; mhart@tlchb.org; mhoffman@nhainc.org; michaelj@auroraprojectinc.org; mike.andersonhsi@gmail.com; mindy@seagatefoodbank.org; mjacomet@nwtoledo.org; mjarret@aol.com; MLK KITCHEN FOR THE POOR, INC; mlk.kitchen@att.net; mmcintyre@mvhabitat.org; msachs@nwtoledo.org; nancy.elzinga@gmail.com; NEIGHBORHOOD HEALTH ASSOCIATION, IN; ntaylor@nwtoledo.org; pageelaine1@aol.com; paul@toledodesigncollective.org; rgagnon@lucasmha.org; riccardi@believecenter.org; rjordan@pathwaytoledo.org; rpetroff@lfhtoledo.org; rstone@ablelaw.org; ryan.bunch@unitedwaytoledo.org; scrabtree@ablelaw.org; stokest@co.lucas.oh.us; tkroma@nwtoledo.org; TOLEDO SEAGATE; tpace@familyhousetoledo.org; tpence@lawolaw.org; trish@seagatefoodbank.org; vhill@lucasmha.org; vmartinez@lawolaw.org; Welch, David; wendy.pestrue@unitedwaytoledo.org; NEIGHBORWORKS TOLEDO REGION; yvonne.dubielak@toledogrows.org; Zgodzinkski, Eric; msutter@lucasmha.org; dcallahan@ablelaw.org

Cc: Subject:

Attachments:

Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene FW: Media Advisory Public Notice for the 2023-2024 One Year Action Plan Media Advisory Public Notice for the 2023-2024 One Year Action Plan.pdf

Good afternoon,

Please see the media advisory below.

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

From: Voigt, Amy

Sent: Monday, March 6, 2023 3:32 PM

Subject: Media Advisory Public Notice for the 2023-2024 One Year Action Plan

Public Notice for the 2023-2024 One Year Action Plan

The City of Toledo is seeking comments on its **Draft** July 1, 2023 – June 30, 2024 One-Year Action Plan to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 17, 2023.

The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2023-2024 program year. The Action Plan provides a description of the activities to be undertaken when using these resources, including Section 108 activities, and the expected results of those activities.

Also, the Action Plan depicts a geographic distribution of assistance including Neighborhood Revitalization Strategy Areas (NRSAs), special needs activities, general and public housing actions, and activities specific to the 2023 49th Year Community Development Block Grant (CDBG), 37th Year Emergency Solutions Grant (ESG), 32nd Year HOME Investment Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP) (if applicable), and the 2020 Lead-Based Paint and Healthy Homes Grant. In addition, the Plan will contain HUD-required certifications, as well as a summary of the community input received at the public hearings regarding the Action Plan.

The **Draft** One-Year Action Plan will be available for review beginning **Wednesday, March 22, 2023**, on the website of the following entities:

Department of Housing and Community Development

One Government Center, 18th Floor Downtown Toledo, Jackson & Erie Streets toledo.oh.gov/housing

Lucas Metropolitan Housing

424 Jackson Street, Toledo, Ohio 43604 www.lucasmha.org

Office of the Mayor

One Government Center, 22nd Floor Downtown Toledo, Jackson & Erie Streets toledo.oh.gov/mayor

Toledo Lucas County Homelessness Board

1220 Madison Ave.
Toledo, Ohio 43604
endinghomelessnesstoledo.org

Clerk of Council

One Government Center, 21st Floor Downtown Toledo, Jackson & Erie Streets toledo.oh.gov/city-council

Toledo-Lucas County Public Library

325 Michigan St. Toledo, Ohio 43604 toledolibrary.org

The Fair Housing Center

326 N. Erie St. Toledo, Ohio 43604 toledofhc.org

Lucas Co. Board of Developmental Disabilities

1154 Larc Ln. Toledo, Ohio 43614 lucasdd.info

Public Hearings on the Draft One-Year Action Plan:

Thursday, March 23, 2023, 5:30 p.m. by Virtual Hearing:

Click here to join

Passcode: 530143 Or one tap mobile:

US: +1408-961-3927,,85826018584#,,,,*530143# or 1855-758-1310,,85826018584#,,,,*530143# (Toll Free)

Or Telephone:

Dial (for higher quality, dial a number based on your current location):

US: +1 408-961-3927 or 1 855-758-1310 (Toll Free)

Webinar ID: 858 2601 8584

Passcode: 530143

International numbers available: https://toledo-oh-gov.zoom.us/u/kcb6CLkrBi

Thursday, March 30, 2023, 5:30 p.m. by Virtual Hearing:

Click here to join

Passcode: 844885

Or one tap mobile:

US: +1408-961-3927,,82912448121#,,,,*844885# or 1855-758-1310,,82912448121#,,,,*844885# (Toll Free)

Or Telephone:

Dial (for higher quality, dial a number based on your current location):

US: +1 408-961-3927 or 1 855-758-1310 (Toll Free)

Webinar ID: 829 1244 8121

Passcode: 844885

International numbers available: https://toledo-oh-gov.zoom.us/u/kdEZ48X4uU

The City of Toledo will also receive comments from the public in writing beginning **Wednesday**, **March 22**, **2023 through Thursday**, **April 20**, **2023**, at the following address:

City of Toledo
Department of Housing and Community Development
2023-2024 One-Year Action Plan
One Government Center, Ste 1800
Toledo, Ohio 43604

The City of Toledo supports the provisions of the Americans with Disabilities Act. If you would like to request a reasonable accommodation, please contact the Office of Diversity and Inclusion ADA coordinator at (419) 245-1198 or submit a request online at toledo.oh.gov/ada.

###



Amy Voigt

Communications Specialist amy.voigt@toledo.oh.gov cell 419-389-2260

Bridget Ridley

Communications Specialist bridget.ridley@toledo.oh.gov cell 419-654-8232

Marketing and Communications

One Government Center Suite 2200 Toledo, Ohio 43604

⇒ toledo.oh.gov

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MARCH 6, 2023

Public Notice for the 2023-2024 One Year Action Plan

The City of Toledo is seeking comments on its **Draft** July 1, 2023 – June 30, 2024 One-Year Action Plan to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 17, 2023. The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

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Department of Housing and Community Development

One Government Center, 18th Floor Downtown Toledo, Jackson & Erie Streets toledo.oh.gov/housing



Amy Voigt

Communications Specialist amy.voigt@toledo.oh.gov cell 419-389-2260

Bridget Ridley

Communications Specialist bridget.ridley@toledo.oh.gov cell 419-654-8232

Marketing and Communications

One Government Center Suite 2200 Toledo, Ohio 43604

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Lucas Metropolitan Housing

424 Jackson Street, Toledo, Ohio 43604 www.lucasmha.org

Office of the Mayor

One Government Center, 22nd Floor Downtown Toledo, Jackson & Erie Streets toledo.oh.gov/mayor

Toledo Lucas County Homelessness Board

1220 Madison Ave.
Toledo, Ohio 43604
endinghomelessnesstoledo.org

Clerk of Council

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Toledo-Lucas County Public Library

325 Michigan St. Toledo, Ohio 43604 toledolibrary.org

The Fair Housing Center

326 N. Erie St. Toledo, Ohio 43604 toledofhc.org

Lucas Co. Board of Developmental Disabilities

1154 Larc Ln. Toledo, Ohio 43614 <u>lucasdd.info</u>

Public Hearings on the Draft One-Year Action Plan: Thursday, March 23, 2023, 5:30 p.m. by Virtual Hearing:

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US: +1408-961-3927,,85826018584#,,,,*530143# or 1855-758-1310,,85826018584#,,,,*530143# (Toll Free)



Amy Voigt

Communications Specialist amy.voigt@toledo.oh.gov cell 419-389-2260

Bridget Ridley

Communications Specialist bridget.ridley@toledo.oh.gov cell 419-654-8232

Marketing and Communications

One Government Center Suite 2200 Toledo, Ohio 43604

* toledo.oh.gov

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Or Telephone:

Dial (for higher quality, dial a number based on your current location):

US: +1 408-961-3927 or 1 855-758-1310 (Toll Free)

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Thursday, March 30, 2023, 5:30 p.m. by Virtual Hearing:

Click here to join Passcode: 844885

Or one tap mobile:

US: +1408-961-3927,,82912448121#,,,,*844885# or 1855-758-

1310,,82912448121#,,,,*844885# (Toll Free)

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Passcode: 844885

International numbers available: https://toledo-oh-

gov.zoom.us/u/kdEZ48X4uU

The City of Toledo will also receive comments from the public in writing beginning **Wednesday**, **March 22**, **2023 through Thursday**, **April 20**, **2023**, at the following address:

City of Toledo

Department of Housing and Community Development 2023-2024 One-Year Action Plan One Government Center, Ste 1800 Toledo, Ohio 43604

The City of Toledo supports the provisions of the Americans with Disabilities Act. If you would like to request a reasonable accommodation, please contact the Office of Diversity and Inclusion ADA coordinator at (419) 245-1198 or submit a request online at toledo.oh.gov/ada.

Brown, Monica

From: Sent:

To:

Thorpe, Susan

Monday, March 20, 2023 9:37 AM

areid@ctwtoledo.org; Ebony Robinson, Director; rmosley@lucasmha.org; tjsoros@aol.com; tom@waniewski.com; annebbert@cherrystreetmission.org; spiller@cherrystreetmission.org; abarrett@cherrystreetmission.org; srayford@cherrystreetmission.org; Shane Douglas; Rebecca Shields; Tyson Bouyack; rhunt@ecdi.org; abdul.hamadeh@unitedwaytoledo.org; annebauman@compassionhealthtoledo.org; anneruch@gmail.com; antduran8213

@gmail.com; aparlet@ecdi.org; ArringtL@co.lucas.oh.us; awelch@ecdi.org; believecenter@gmail.com; brendah_etsac@yahoo.com; carol.gray@toledogrows.org; chichen@tlshb.org; chuckp@gurarensciecting.org; disparts @gracil.com;

cbishop@tlchb.org; chuckp@auroraprojectinc.org; cjamato@gmail.com; dalexander@familyhousetoledo.org; DeniseF@auroraprojectinc.org;

dgray@nwtoledo.org; dhawkins@toledofhc.org; dpeluso@familyhousetoledo.org; EAST TOLEDO FAMILY CENTER; eellis@toledodesigncollective.org; elaina@believecenter.org; emcpartland@mvhabitat.org; eod.sqacc@gmail.com; estanbery@toledofhc.org; frankt@co.lucas.oh.us; gcommu8708@bex.net; grantsadministrator@tlchb.org; grantwriter@spcc-toledo.org; gthomas@toledofhc.org; hzeller@lucasmha.org;

ikinney@ecdi.org; jacksonv@co.lucas.oh.us; janeltate@gmail.com; jb_sqacc@yahoo.com; jblack@pathwaytoledo.org; jcintronvega@lucasmha.org; jhabib@spcc-toledo.org; jjacobs@lfhtoledo.org; jjarrett@theartscommission.org; jmpinskey@gmail.com;

jmueller@pathwaytoledo.org; jodig@etfc.org; jswiech@gallonlaw.com; kachinger@mvhabitat.org; kbond@lucasmha.org; kclark@pathwaytoledo.org;

lbanks@lfhtoledo.org; LEGAL AID OF WESTERN OHIO, INC.; lpengov@spcc-toledo.org;

lschoen@lucasmha.org; lsmigielski@nhainc.org; lweller@lawolaw.org; mariemflannery@toledofhc.org; matt.morris@unitedwaytoledo.org;

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mfolk@theartscommission.org; mhart@tlchb.org; mhoffman@nhainc.org; michaeli@auroraprojectinc.org; mike andersonhsi@gmail.com;

michaelj@auroraprojectinc.org; mike.andersonhsi@gmail.com;

mindy@seagatefoodbank.org; mjacomet@nwtoledo.org; mjarret@aol.com; MLK KITCHEN FOR THE POOR, INC; mlk.kitchen@att.net; mmcintyre@mvhabitat.org; msachs@nwtoledo.org; nancy.elzinga@gmail.com; NEIGHBORHOOD HEALTH

ASSOCIATION, IN; ntaylor@nwtoledo.org; pageelaine1@aol.com;

paul@toledodesigncollective.org; rgagnon@lucasmha.org; riccardi@believecenter.org;

rjordan@pathwaytoledo.org; rpetroff@lfhtoledo.org; rstone@ablelaw.org;

ryan.bunch@unitedwaytoledo.org; scrabtree@ablelaw.org; stokest@co.lucas.oh.us;

tkroma@nwtoledo.org; TOLEDO SEAGATE; tpace@familyhousetoledo.org; tpence@lawolaw.org; trish@seagatefoodbank.org; vhill@lucasmha.org; vmartinez@lawolaw.org; Welch,David; wendy.pestrue@unitedwaytoledo.org;

NEIGHBORWORKS TOLEDO REGION; yvonne.dubielak@toledogrows.org; Zgodzinkski,

Eric

Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene 2023-2024 One-Year Action Plan Public Notice (REMINDER)

2025 2024 One real Action Flat Lable Notice (NEIVIII

2023-2024 Action Plan Public Notice.doc

Importance:

Attachments:

Cc:

Subject:

High

Good morning,

Just a friendly reminder -

The City of Toledo, Department of Housing and Community Development has scheduled two (2) public hearings on the Draft 2023-2024 One-Year Action Plan. The One-Year Action Plan includes a description of the federal funds anticipated to be received and other resources expected to be available within the City of Toledo during the 2023-2024 program year. The Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

You are invited to attend the public hearings on the One-Year Action Plan.

Public Hearings on the Draft One-Year Action Plan are scheduled as follows:

Thursday, March 23, 2023, 5:30 p.m. by Virtual Hearing:

Virtual Link: https://toledo-oh-gov.zoom.us/j/85826018584

Passcode: 530143 Or one tap mobile:

US: +1408-961-3927,,85826018584#,,,,*530143# or 1855-758-1310,,85826018584#,,,,*530143# (Toll Free)

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Webinar ID: 829 1244 8121

Passcode: 844885

International numbers available: https://toledo-oh-gov.zoom.us/u/kdEZ48X4uU

Please see the attached public notice for additional information.

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

2023-2024 ONE-YEAR ACTION PLAN

To all interested agencies, groups, and persons:

The City of Toledo is seeking comments on its **Draft** July 1, 2023 – June 30, 2024 One-Year Action Plan to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 17, 2023. The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2023-2024 program year. The Action Plan provides a description of the activities to be undertaken when using these resources and the expected results of those activities. Also, the Action Plan depicts a geographic distribution of assistance including Neighborhood Revitalization Strategy Areas (NRSAs), special needs activities, general and public housing actions, and activities specific to the 2023 49th Year Community Development Block Grant (CDBG), 37th Year Emergency Solutions Grant (ESG), 32nd Year HOME Investment Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP) (if applicable), and the 2020 Lead-Based Paint and Healthy Homes Grant. In addition, the Plan will contain HUD-required certifications, as well as a summary of the community input received at the public hearings regarding the Action Plan.

The Draft One-Year Action Plan will be available for review beginning Wednesday, March 22, 2023, 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

Office of the Mayor

One Government Center, 22nd Floor Downtown Toledo, Jackson & Erie Streets

website: https://toledo.oh.gov/government/mayor

Clerk of Council

One Government Center, 21st Floor Downtown Toledo, Jackson & Erie Streets

website: https://toledo.oh.gov/government/city-council/

The Fair Housing Center 326 N. Erie Street

Toledo, Ohio 43604

website: www.toledofhc.org

Lucas Metropolitan Housing

424 Jackson Street

Toledo, Ohio 43604

website: www.lucasmha.org

Toledo Lucas County Homelessness Board

1220 Madison Avenue Toledo, Ohio 43604

website: www.endinghomelessnesstoledo.org

Toledo-Lucas County Public Library

325 Michigan Street

Toledo, Ohio 43604 website: www.toledolibrary.org

Lucas Co. Board of Developmental Disabilities

1154 Larc Lane Toledo, Ohio 43614

website: www.lucasdd.info

Public Hearings on the **Draft** One-Year Action Plan are scheduled as follows:

Thursday, March 23, 2023, 5:30 p.m. by Virtual Hearing:

Virtual Link: https://toledo-oh-gov.zoom.us/j/85826018584

Passcode: 530143 Or one tap mobile:

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The City of Toledo will also receive comments from the public in writing beginning Wednesday, March 22, 2023 through Thursday, April 20, 2023, at the following address:

CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2023-2024 ONE-YEAR ACTION PLAN
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

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Fair Housing

Fair Housing Action Plan: January 2022 – January 2023 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.

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.

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 waiver 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.

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

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.

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 implement 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.
- A 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.

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.

Fair Housing Issue: Homeownership: Lending and Insurance

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.

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	City staff may help		TFHC will help	Second
information	provide information		collect	half of FY
on current	on current		information	2020
enforcement	enforcement of			
efforts	accessibility rules			
Develop	Provide support to		With available	Second
and review	TFHC		resources, will	half of FY
plans for			perform	2020
outreach			outreach	
Develop	Provide support to		With available	Second
and	TFHC		resources,	half of FY
implement			enforce Fair	2020
plans for			Housing laws	
enforcement				

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

- 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).

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
- 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.

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, MHRSB, 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

 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.

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, MHRSB, 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.

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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. 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 vouch 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.

Goal: Enforce Fair Housing protections

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

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
- 1 00103
- 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 Harassment133 Rental4 Sales1 Zoning

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

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 and manage	Ongoing, reported quarterly
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
 - o 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
 - o Impressions realized: 12,128,322
- Distribution of fair housing brochures and educational materials: 362
- Trainings conducted: 46
 - o 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
 - o Impressions realized: 3,723,108
- Distribution of fair housing brochures and educational materials: 15,124
- Trainings conducted: 21
 - o 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
 - o Impressions realized: 18,334,745
- Distribution of fair housing brochures and educational materials: 2,838

• Trainings conducted: 31

o 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

o Impressions realized: 1,337,488

• Distribution of fair housing brochures and educational materials: 10,410

Trainings conducted: 18

Persons trained: 392

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.

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	MHRSB	Provide input on policy revisions	First half of FY 2020
Present proposed changes for approval	Plan Commission, City Council	MHRSB	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	MHRSB	Advocate for policy changes during public hearings	Ongoing, reported quarterly
Grant reasonable accommodations when applicable	Plan Commission, City Council	MHRSB	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, MHRSB, 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.

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.

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, MHRSB, 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, MHRSB, 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. 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:

- 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 (<u>www.ToledoLeadSafe.com</u>) 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.

- 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 (<u>www.ToledoLeadSafe.com</u>). 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.

• 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.

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.

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.

• 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.

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:
 - o 24 grants & waiver
 - o 8 temp ramp program
 - o 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
- 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:
 - o 15 grants & waiver
 - o 9 temp ramp program
 - o 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:
 - o 15 grants and waiver
 - 6 temp ramp program to help D/C safely
 - o 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.

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

- 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 being 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 to 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

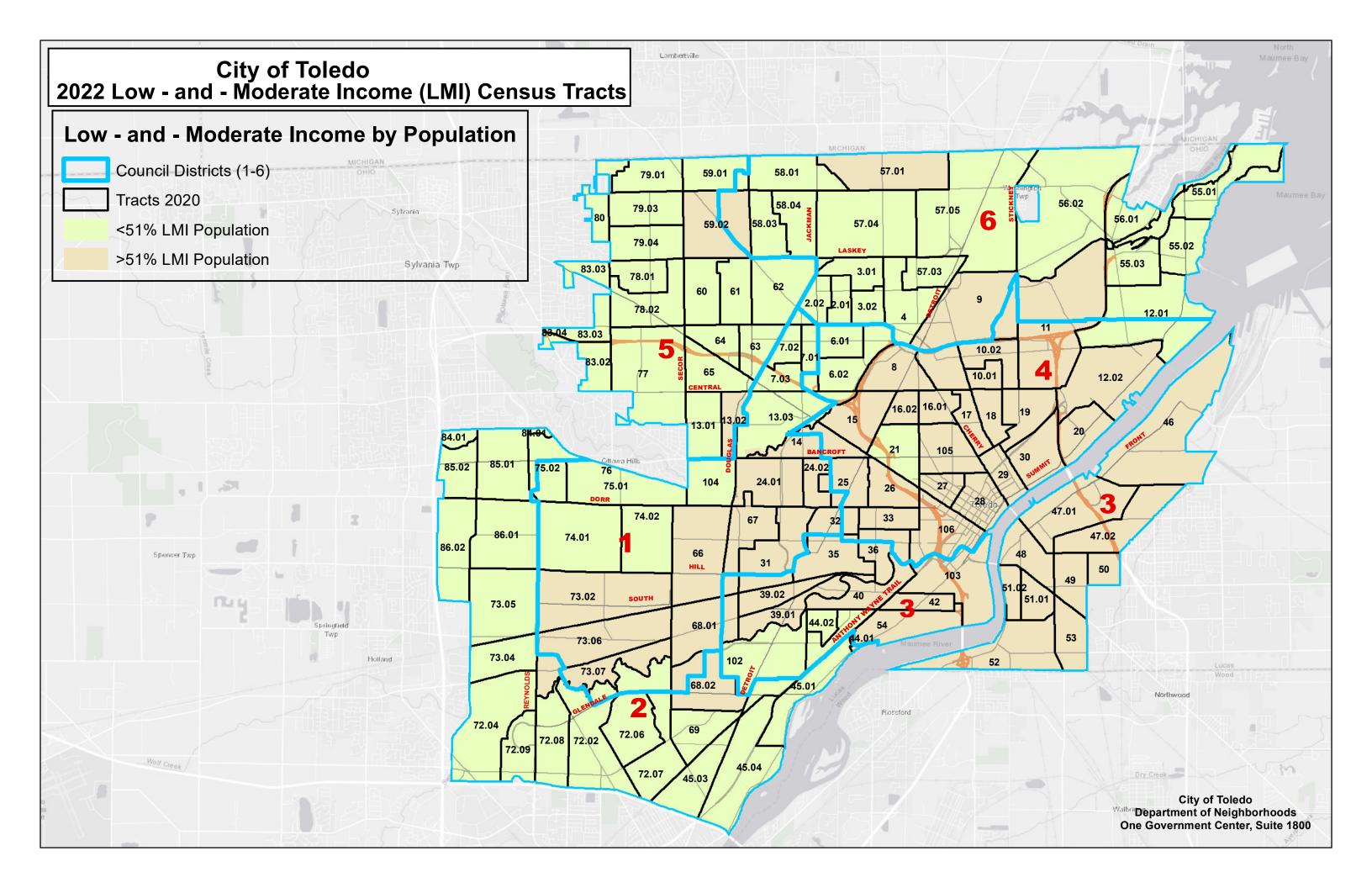
- Because Ohio law requires that water service be set up in the landlord's name, complications arise when tenants are asked to pay for water but do not have access to the account. In an effort to combat the confusing and abusive practices that often arise when water costs are passed onto tenants, TFHC 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 though 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

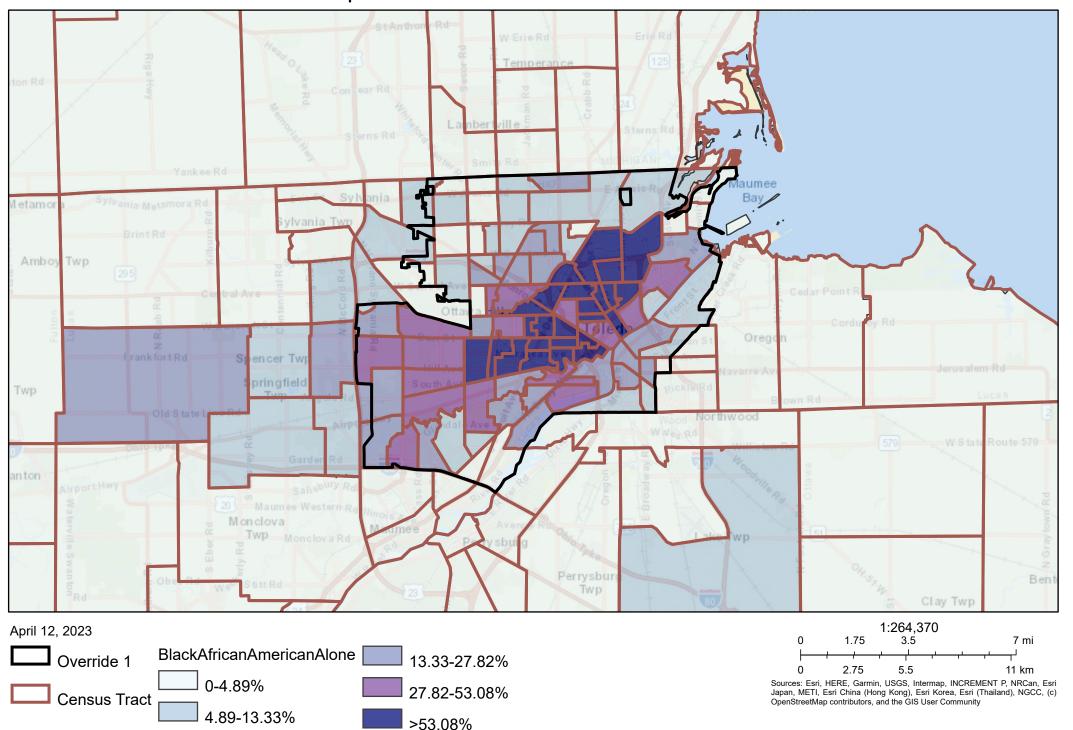
- The overall efforts to improve affordability as described above. The City has implemented a number of programs to help address affordability in the area.
- One important aspect of affordability is that landlords sometimes resell water to tenants, by charging the extra for water that the landlord pays 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.



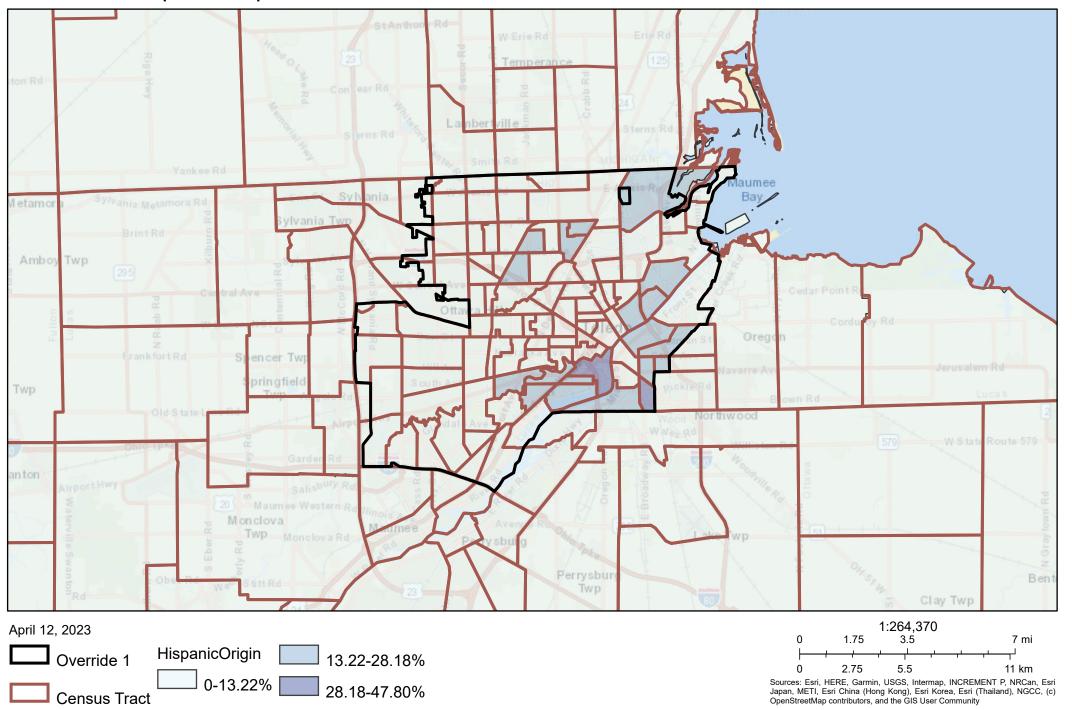
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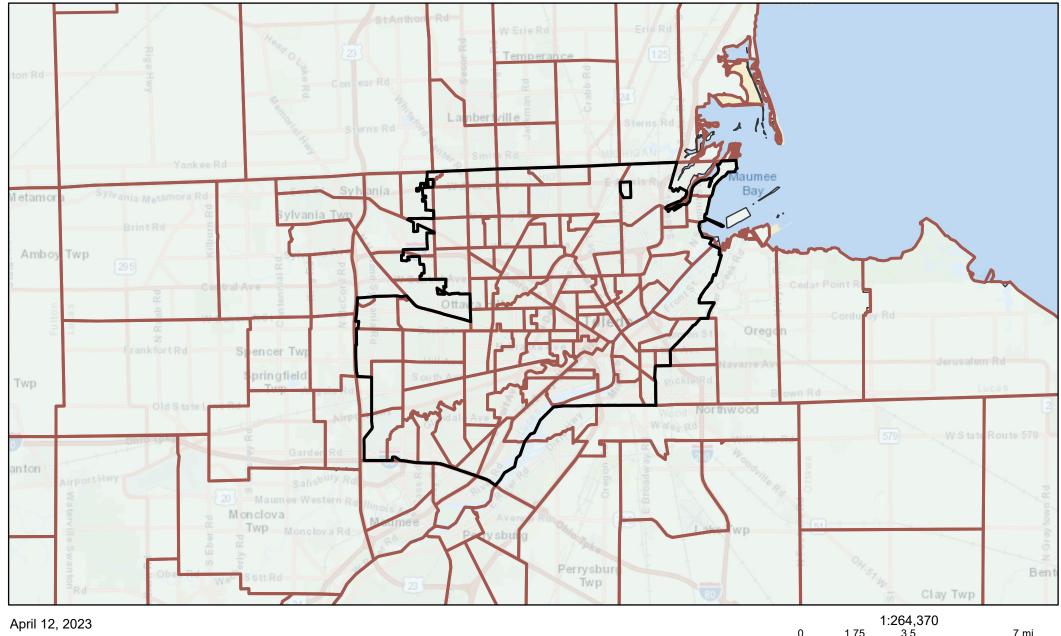
- Black or African American Population in Toledo - Concentration of Minorities Per Census Tract

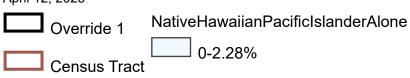


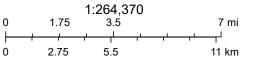
- Hispanic Population in Toledo - Concentration of Minorities Per Census Tract



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

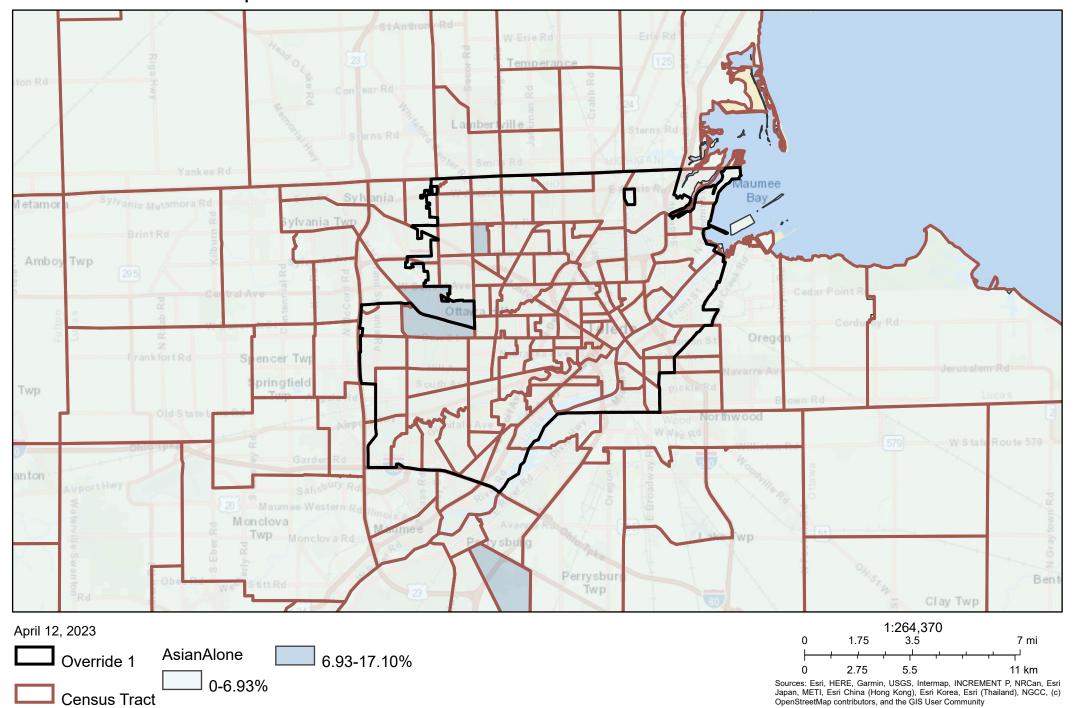




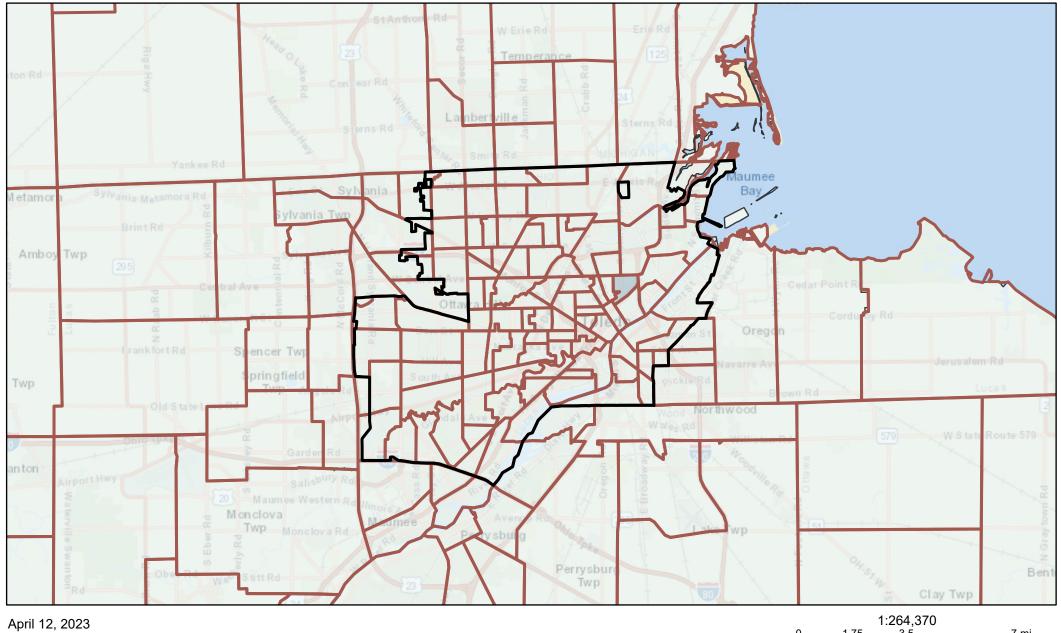


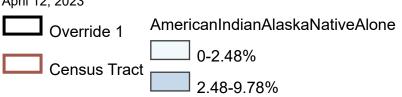
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

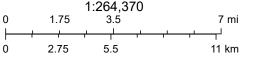
- Asian Population in Toledo - Concentration of Minorities Per Census Tract



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

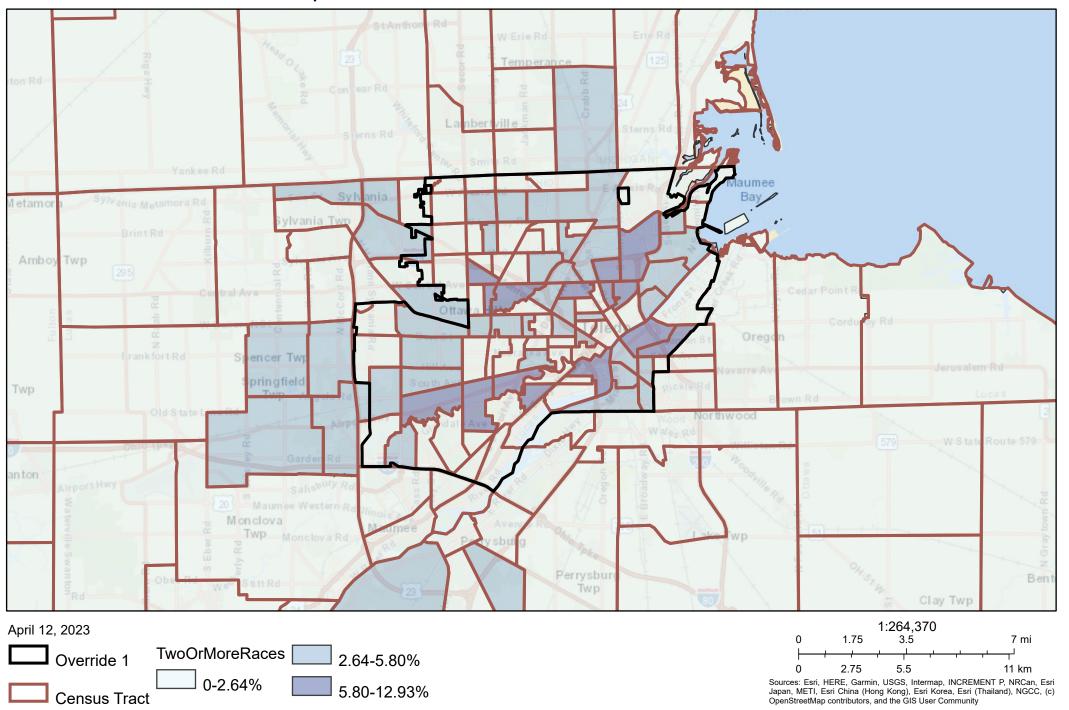




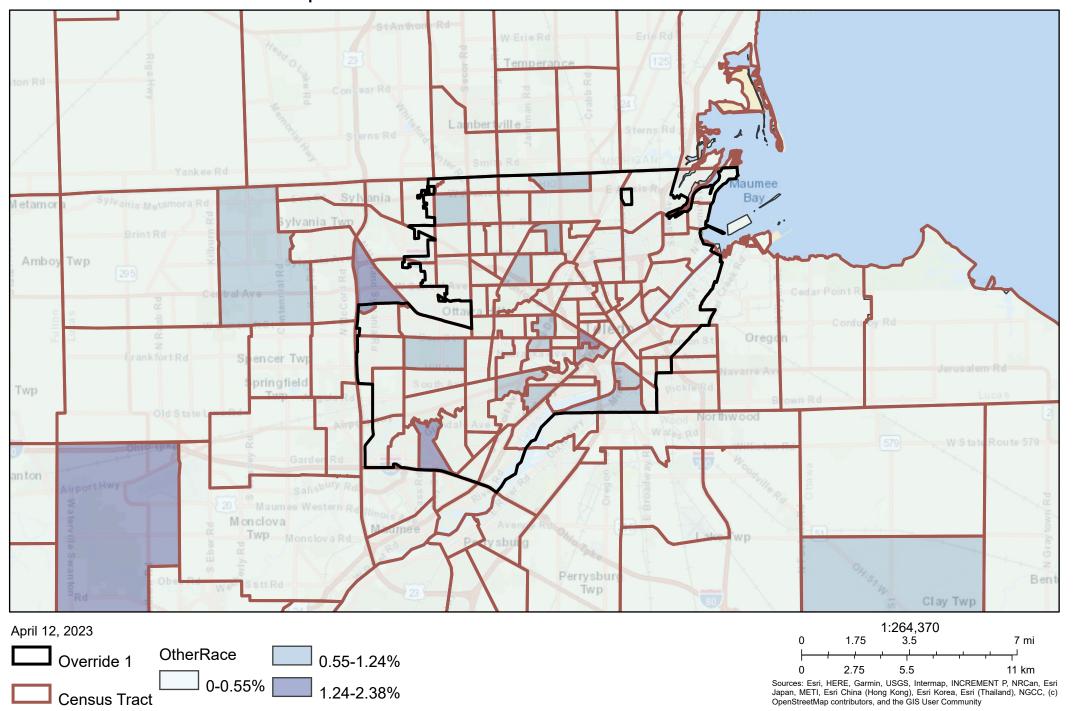


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- Two or More Races Population in Toledo - Concentration of Minorities Per Census Tract



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





Emergency Solutions Grants And Homelessness



OH-501 TOLEDO/LUCAS COUNTY CONTINUUM OF CARE WRITTEN STANDARDS

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INTRODUCTION

The OH-501 Toledo/Lucas County Continuum of Care (CoC) is responsible for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of the CoC, which covers all of Lucas County, Ohio. Both the Emergency Solutions Grant (ESG) Rule and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rule state that the CoC must establish and consistently follow written standards for providing Continuum of Care assistance.

They will be reviewed annually, and any substantial changes will be approved by the TLCHB Board of Directors.

The written standards have been established to ensure that persons experiencing homelessness who enter projects throughout the OH-501 Toledo/Lucas County CoC jurisdiction will be given similar information and support to access and maintain permanent housing. All projects that receive City of Toledo ESG and OH-501 Toledo/Lucas County CoC funding are required to abide by these written standards where applicable. The CoC strongly encourages projects that do not receive either of these sources of funds to accept and utilize these written standards.

It should be noted that the U.S. Department of Housing and Urban Development (HUD) regulations for each of the referenced programs shall always take precedence over any of the standards outlined in this document (https://www.hudexchange.info). The CoC Program Notice of Funding Opportunity (NOFO) may authorize additional eligibility requirements. Projects funded under the CoC program must follow both CoC Program NOFO and other HUD-issued guidance and requirements. In addition, local ESG Programs may impose additional requirements to their funding recipients that do not apply to other CoC recipients.

In the event of a declared state of emergency, natural disaster, public health crisis, or other extenuating circumstances, the OH-501 Toledo/Lucas County CoC may issue emergency protocols which would be in effect for the duration of and in response to those circumstances. Such guidance will be issued in a separate addendum to the Written Standards.

GENERAL STANDARDS

The following standards apply to all projects funded through the CoC or with City of Toledo ESG and CDBG funds.

HMIS Participation

All organizations receiving ESG, CDBG or CoC funds must participate fully in the CoC's Homeless Management Information System (HMIS) to enter data on persons served and assistance provided. Victim service providers receiving ESG or CoC funds are required by 24 CFR 576.400(f) and 580.32(d) to use a comparable database that meets all HUD standards for HMIS and provides for security, data quality, and privacy.

Coordinated Entry Process (a/k/a Coordinated Assessment System)

All projects located within the OH-501 Toledo/Lucas County CoC that receive CoC and Emergency Solutions Grants (ESG) funding are required to participate in the coordinated assessment system and are therefore subject to complying with the Coordinated Entry Written Standards, Policies and Procedures as outlined and developed by the OH-501 Toledo/Lucas County. This system will include all homeless subpopulations and involve the use of a standardized assessment tool designated by the Coordinated Entry Written Standards. This system will establish a uniform decision-making process to prioritize households seeking assistance and provide referrals to those households. The coordinated entry system (CES) will ensure that those with the greatest needs receive priority for housing and service provision and that no unnecessary barriers exist for individuals to receive assistance. The Coordinated Entry Written Standards, Policies, and Procedures can be found at The Coordinated Entry Written Standards, Policies and Procedures can be found at: https://endinghomelessnesstoledo.org/coordinated-assessment.

The terms "Coordinated Entry Process" and "Centralized or Coordinated Assessment System" are used interchangeably throughout federal guidelines. The CoC Program interim rule at 24 CFR 578.3 defines centralized or coordinated assessment as the following:

"...a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool..."

For the purpose of this document, the term "Coordinated Entry" or "Coordinated Entry Process" are used to reference "Centralized or Coordinated Assessment System" and "Coordinated Entry Process."

Removal of Barriers

All projects that have committed to a Housing First approach must ensure that their projects do not screen any individuals or families out for assistance based upon perceived barriers to housing or services. All OH-501 Toledo/Lucas County providers are encouraged to review their policies and remove barriers wherever possible. Examples of this include, but are not limited to, the following:

Having too little or no income

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- Current or past substance abuse
- Having a criminal record (w/exception of state mandated restrictions)
- Having a history of domestic violence

In addition, assistance may not be terminated to any recipients based upon these barriers. Examples of this include:

- Failure to participate in supportive services and case management activities
- Failure to make progress on a services plan
- Loss of income or failure to improve income
- Being a victim of domestic violence

Termination of Assistance

ESG or CoC-funded homeless assistance providers may terminate assistance to a program participant who violates program requirements or conditions of occupancy. Termination under this section does not bar the provider from providing further assistance at a later date to the same individual or family.

In terminating assistance to a program participant, the provider must have in place a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance.
- Written notice to the program participant containing a clear statement of the reason(s) for termination.
- The option for a review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision.
- Prompt written notice of the final decision to the program participant.

Providers of permanent supportive housing for hard-to house populations of homeless persons must exercise judgement and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that the participant's assistance is terminated only in the most severe cases. All CoC, ESG and CDBG must have a grievance policy.

Grievance Policy Process

The Toledo Lucas County Homelessness Board is committed to ensure that clients receiving services

are aware of the rights afforded to them. TLCHB staff will prepare an annual summary of all grievances and resolutions and provide an annual report to the board of directors.

Procedure: Grievance Assignment

TLCHB's Executive Director will assign a team member from Toledo Lucas County Homelessness Board.

Once someone has been assigned, the agency will be contacted by notifying them via email as to who has been assigned to review the grievance.

Procedure: Client Grievances

- 1. The Toledo Lucas County Homelessness Board will accept and review all complaints/grievances.
- 2. TLCHB will notify the agency of the grievance and gain any additional details necessary to make a further determination.
- 3. TLCHB will then determine if further grievance follow-up will require an on-site visit with the agency and client.
- 4. Once a determination has been made the agency and client will be notified of the date and time that the visit will occur, and who is assigned to the grievance from TLCHB.
- 5. At the grievance meeting, both the client and the agency staff will have the opportunity to present all their concerns.
- 6. Once this meeting is concluded, within 7-10 business a report will be issued determining the outcome of the grievance.
- 7. The agency's Board President, Executive Director and client(s) will receive a copy of the final report

Procedure: Client Guidelines and Grievance Policy

- 1. TLCHB will annually review each agency's Client Guidelines and Grievance Policy.
- 2. TLCHB will provide an annual and semi-annual report of all grievances and outcomes to the Executive Director and Board President of each agency.
- 3. This information will also be made available for agency funders.

Faith-Based Activities

The minimum standards required for faith-based providers are as follows:

- Providers receiving funding through ESG, CDBG or CoC programs may not engage
 in inherently religious activities as part of those funded activities. Those religious
 activities must be offered separately from the ESG, CDBG or CoC-funded projects
 and all participation must be voluntary.
- All religious organizations receiving ESG, CDBG or CoC funding shall retain their
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independence from government and may continue with their missions provided that ESG, CDBG or CoC funds are not used to support inherently religious activities. They shall also maintain authority over their internal governance.

- No organization receiving ESG, CDBG or CoC funds may discriminate against a participant based on religion or religious beliefs.
- ESG, CDBG and CoC funds may be used for the rehabilitation of structures that are used for eligible activities under the programs but may not be used to rehabilitate structures used specifically for religious activities.

Fair Housing and Equal Opportunity

It is the policy of the OH-501 Toledo/Lucas County CoC to comply fully with all federal, state, and local nondiscrimination laws and to operate in accordance with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. The OH-501 Toledo/Lucas County CoC, including its recipients and subrecipients, shall not on account of race, color, sex, religion, national origin, family status, disability or age deny any family or individual the opportunity to apply for or receive

assistance under HUD's Programs. All recipients and sub-recipients of ESG, CDBG and CoC funding must comply with the requirements for equal opportunity, nondiscrimination, and affirmatively furthering fair housing as outlined in Section 578.93 of the Continuum of Care Program interim rule and any applicable ESG regulations.

All clients served by an agency that is receiving ESG, CDBG or CoC funding has the following rights:

- 1. The right to receive all eligible services.
- 2. The right to be treated with dignity and respect.
- 3. The right to receive quality services.

Language Access Plan

All recipients and sub-recipients of ESG, CDBG and CoC funding must provide Limited English Proficiency (LEP) persons with meaningful access to federally funded programs. HUD issued new guidance on Fair Housing Act Protections for Persons with Limited English Proficiency on September 15, 2016, and DCA issued its new Language Access Plan (LAP) effective 2016 to 2021 that details its plan to provide LEP persons with meaningful access to programs. DCA will provide guidance and training to State of City of Toledo ESG, CDBG sub-recipients and OH-501 Toledo/Lucas County CoC recipients on providing language access services, including the components of a meaningful LAP, options for translation and interpretation services, and assistance with identifying methods to ensure meaningful access to programs and activities. More information on DCA's Fair Housing Policy can be found at the Fair Housing Statement page.

Allowable Family Limitations and Prohibition against Involuntary Family Separation

The CoC Interim Rule 24 CFR 578.93 (e) and 24 CFR 576.102(b) explicitly prohibit any kind of involuntary family separation and the denial of admission to selected family members in all CoC Program- funded projects and ESG-funded emergency shelters. It is acceptable for programs to limit participation to only households with children. However, if a project accepts any households with children, they must accept all households with children. This means that any provider that has historically accepted only women with children may not limit their project to

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that population. They must also accept couples with children or single men with children as well.

In addition, the age and/or gender of a child under age 18 must not be used as a basis for denying any family's admission to a project receiving ESG,CDBG or CoC funding.

Equal Access Requirements

HUD published a final rule on September 21, 2016 entitled Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs that became effective on

October 21, 2016. This rule includes the following central provisions:

- All HUD-assisted and HUD-insured housing must be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- Owners and administrators of HUD-assisted housing and HUD-insured housing are prohibited
- from inquiring into an applicant or occupant's sexual orientation and gender identity for the purpose of determining eligibility or otherwise making housing available.
- The definition of "family" is revised to include all families regardless of the actual or perceived sexual orientation, gender identity, or marital status of its members.

This rule shall apply to all ESG, CDBG or CoC-funded projects with two exceptions. This prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant's sex where the housing provided or to be provided to the individual is temporary, emergency shelter for adults only with a physical configuration such that privacy is a concern, specifically shared bathing areas or shared sleeping areas. A shared bathing area is one in which there are multiple toilet stalls or shower stalls or open showers. Nor does it apply to inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled. In addition, this provision does not prohibit voluntary self-identification of sexual orientation or gender identity by participants. The OH-501 Toledo/Lucas County, including recipients and subrecipients, will comply with the Equal Access Rule at 24 CFR 5.105 and 5.106.

Complete City of Toledo ESG program requirements for written standards, policies and procedures, including ones not addressed in this document, can be found in the City of Toledo's Department of Neighborhoods ESG /CDBG Third-Party Partners Manual.

Violence Against Women Act (VAWA) Requirements

Under the HUD Final Rule Implementing VAWA Reauthorization Act of 2013, the OH-501 Toledo/Lucas County CoC have adopted policies to include provisions for protection of victims of domestic violence, dating violence, sexual assault, sexual battery or stalking, regardless of sex, gender identity, gender expression or actual or perceived sexual orientation.

These policies and procedures apply to CoC-funded Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH) programs. ESG-funded programs are subject to VAWA policies issued by the administrator of ESG funds. As a part of these policies and procedures, the CoC has put in place a policy for emergency transfers. The full details of the policy can be found in the City of Toledo, Department of Neighborhoods Third-Party Manual ESG / CDBG Guidebook.

STREET OUTREACH PROJECTS

Definition

Street outreach projects are those activities that are undertaken to identify potential homeless project recipients for the purpose of providing them with immediate support and intervention activities.

Eligibility

HUD Requirements

Recipients of these services must meet the HUD definition of homelessness under Category 1.

These would be unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

CoC Recommendations

Agencies administering Street Outreach Projects must have policies on safety standards and procedures. Engagement should occur during times when there is a reasonable expectation to believe people have no housing options

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

- 1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

2. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/ Prioritization

Individuals and families shall be assessed where they are and will be offered the following Street Outreach services, as needed and appropriate: engagement, case management, emergency health and mental health, and transportation services where they are otherwise not available in the mainstream. Based on the need of services

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population, Street Outreach projects must assess, prioritize, and re-assess the need for essential services related to street outreach, and they should continuously engage unsheltered persons and persons experiencing chronic homelessness (and most at risk of becoming chronically homeless), even if they repeatedly decline housing and services. When appropriate based on the individual's needs and wishes, the referral to permanent supportive housing or rapid re- housing that can quickly assist the individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to an emergency shelter. Street Outreach Projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures, which will provide information on prioritization and reassessment for services.

EMERGENCY SHELTERS

Definition

Any facility or project (including hotel/motel voucher projects) where the primary purpose is to provide a temporary shelter for the homeless in general, or for specific populations of the homeless, which does not require occupants to sign leases or occupancy agreements.

Eligibility

HUD Eligibility

Individuals and families entering the shelter system must be homeless per the HUD Homeless Definition, Category 1, literally homeless, Category 2, imminent risk of homelessness, Category 3, homeless under other federal statutes, or Category 4, fleeing or attempting to flee domestic violence (with documentation as detailed elsewhere in this document). Shelter facilities may accept clients

that are not HUD-defined homeless, but they must administratively separate those clients so that ESG

funds are not used for non-HUD-defined homeless clients.

CoC Recommendations

Projects should have expedited admission processes, to the greatest extent possible, including providing assistance with obtaining necessary documentation. Further, shelters should not require, upon admission, that residents have IDs or be entered into HMIS. Projects should also not require any fees.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

- 1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

2. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment / Prioritization

Emergency Shelter projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures. Domestic violence (DV) projects may utilize the coordinated entry system but are not required to participate due to issues of confidentiality. Homeless youth (12 - 18 yrs. of age) may still access shelter through an existing community program. Priority will be given to individuals and families with no income and to those who have extremely low income (30 percent of AMI) as dictated by Area Median Income.

TRANSITIONAL HOUSING PROJECTS (TH)

Definition

Transitional Housing Projects provide subsidized housing and supportive services, for a period not to exceed 24 months, to facilitate the movement of homeless individuals and families to permanent housing.

Eligibility

HUD Eligibility

Individuals and families must be homeless per the HUD Homeless Definition, Category 1, literally homeless or Category 4, fleeing or attempting to flee domestic violence as long as they meet category 1 requirements as well.

CoC Requirements

Priority should be given to individuals and families with no income and to those who have extremely low income (30 percent of AMI) as dictated by Area Median Income. Additional income limits may be set by additional funding sources of the transitional housing project.

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.

Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this. Entitlement jurisdictions within the CoC may further restrict funding of TH projects to require (and only fund) TH projects that serve high barrier households and/or special needs populations as they determine.

CoC Recommendations

While permanent housing is preferred, research shows that transitional housing may be an effective tool for addressing certain needs, such as housing for underage homeless youth experiencing homelessness, safety for persons fleeing domestic violence, and assisting with recovery from addiction.

Homeless individuals and families entering into TH are not expected to be able to qualify for permanent housing. Further, the enrollment of a chronically homeless client into a TH program causes that client to lose their chronically homeless determination making them ineligible for many programs. In cases where households become eligible for permanent housing, it is expected that TH providers will coordinate with organizations that administer these projects in their area. The provision of supportive services and case management are required to be available in transitional housing projects. Participants cannot be charged more than 30 percent of the total household income as rent.

In order to lower barriers to entry, reduce lengths of stay, and improve exits to permanent

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housing, the CoC supports the utilization of transitional housing beds as bridge housing for people who are homeless, where shelter beds are not available and permanent housing has been identified. It should be established at entry that they are chronically homeless and waiting to move into PSH, and the client should not be enrolled into the transitional housing project or be expected to follow service plans associated with the transitional housing project. Please note that there should be a reasonable expectation that the household will move into permanent housing within 30 to 90 days.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

- 1) Literally Homeless (in order of preference)
 - a) Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b) Written observation by an outreach worker; or
 - c) Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d) For individuals exiting an institution one of the forms of evidence above and;
 - i) Discharge paperwork or written/oral referral, or
 - ii) Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/ Prioritization

Transitional housing projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures. Participants may be referred from a broad range of social services including shelter and street outreach. Priority will be given to individuals and families with no income and to those who have extremely low income (30 percent of AMI) as dictated by current HUD limits. Additional income limits may be set by additional funding sources of the transitional housing project.

Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Transitional Housing. Such individual or family shall meet all eligibility criteria required by Federal law or regulation or HUD NOFO, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project. The individual or family shall retain their original homeless or chronically homeless status for the transfer.

RAPID RE-HOUSING PROJECTS (RRH)

Definition

Rapid Re-Housing Projects (RRH) provide housing relocation and stabilization services and time limited rental assistance (short- or medium-term rental assistance) and supportive services to help

homeless individuals or families move as quickly as possible to permanent housing and achieve stability in that housing.

Eligibility

HUD Eligibility*

Individuals and families must meet the Category 1 definition of homelessness (Literally Homeless).

In addition, those who meet the Category 4 definition of homelessness (Fleeing/Attempting to Flee DV) may also qualify if the individual or family is literally homeless. *Please note that an additional eligibility requirement of ESG RRH is that individuals and families must have an annual income at or below 50% AMI.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.

Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

Given that projects should be prioritizing employment assistance and increasing benefits as part of the case management plan, projects should be open to accepting people without current income.

Agencies must offer case management and supportive services to all participants receiving rental assistance that are designed to lead them towards long-term stable housing. Case management and related services may be offered to clients not receiving rental assistance at the agency's discretion.

CoC Recommendations

- Agencies should have a goal of providing a 100% subsidy to participating households for no more than six months and to provide any amount of rental subsidy for no longer than twelve months total.
- Assistance for households with no income or special circumstances could be extended to 18 months. An explanation of these special circumstances along with an evaluation of household needs must be documented in the client file.

Rapid Re-Housing Client Contribution Policy

It is the policy of Rapid Re-Housing (RRH) Projects to provide a declining rental assistance

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subsidy to households participating in the RRH Projects. For households with income, a percentage or amount of client contribution may be based on a reasonable percentage of either the household's income or the monthly rent calculated pursuant to 24 CFR 578.37(a)(1)(ii)(B).

Rent Determination Procedures

- Households will receive a declining subsidy for the duration of their participation in
 the project based on their ability to contribute to their rent. Rental subsidy
 determinations will be evaluated no less than monthly in case management
 meetings. Case managers will review household budget and determine what, if any,
 amount of rent the household is responsible for contributing based upon the
 household's needs and circumstances. The case manager will document the outcome
 of the subsidy determination in the client file.
- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

- 1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

In addition to the homeless verification required above, income eligibility determination documentation is also required for ESG RRH.

- 2. All additional required program must be in clients file with 30 days of intake.
- 3. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/ Prioritization

Individuals or families may be referred from a broad range of social services including shelter and street outreach but must follow the OH-501 Toledo/Lucas County CoC policy for the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures. Priority shall be given to extremely low-income individuals and families (at or below 30 percent AMI) and to individuals and families that have longer length of stay in shelters or on

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the streets.

Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Rapid Re-Housing. Such individual or family shall meet all eligibility criteria required by

Federal law or regulation or HUD NOFO, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project. The individual or family shall retain their original homeless or chronically homeless status for the transfer.

CoC Rapid Re-Housing Projects Only

Utility Allowances (CoC funded only)

The OH-501 Toledo/Lucas County CoC Written Standards give individual projects discretion over

the amount of rental assistance that can be provided to households, provided that the project provides a declining rental subsidy as described herein. Under certain circumstances, based on how a household's rental contribution is calculated, a project may be required to reimburse households for utilities.

If a project uses rent as a factor in determining a household's contribution, and the household is responsible for making separate utility payments that are not included in the contract rent, then rent must be calculated by adding total monthly rent to the monthly allowance for utilities established by the area's Public Housing Authority (PHA), pursuant to 24 CFR 578.37(a)(1)(ii)(B). In this scenario, households must be reimbursed for any amount that the utility allowance exceeds the household's share of rent.

Further clarifying details may be found in Notice CPD-17-11, issued on October 23, 2017. If this notice is amended, superseded, or rescinded by HUD, the most recent guidance from HUD will apply.

ESG Rapid Re-Housing Projects Only

In addition to the standards above, ESG RRH projects will be subject to the following standards.

Utilities (ESG only)

Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their utilities. Please note that utility assistance is not eligible under CoC RRH projects.

- Utilities subsidy determinations will be evaluated no less than monthly in case management meetings. Case managers will review household budget and determine what, if any, amount of rent the household is responsible for contributing based upon the household's needs and circumstances. The case manager will document the outcome of the subsidy determination in the client file.
- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual

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projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Housing Stabilization and/or Relocation Services (ESG only)

The type, amount, and duration of financial assistance for housing stabilization and/or relocation services will be determined based on the needs of the household. The need for this assistance will be evaluated and documented in the client file.

HOMELESS PREVENTION PROJECTS

Definition

Homeless Prevention Projects provide assistance to individuals or families who are at the greatest risk of losing housing due to a legal eviction action that requires the individual or family to leave their residence no later than 14 days following the date of their application for homeless assistance.

Eligibility

HUD Eligibility

Households receiving this funding must have an income level below 30% AMI and must demonstrate that they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or other place defined under Category 1 of the homeless definition. Recipients may be in categories 2-4 under the homeless definition or meet the "at risk" definition in order to qualify for this assistance.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.

Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

CoC Recommendations

Project participants receiving this assistance should receive a case management plan from the provider in order to ensure long term stability. Best practice agencies will be ones with the ability to negotiate with landlords as the first step in resolving eviction crises and that also demonstrate a plan to effectively increase household incomes for project participants. The length of stay should be based on the needs of individual households participating in the project.

- Agencies should have a goal of providing a 100% subsidy to participating households for no more than six months and to provide any amount of rental subsidy for no longer than twelve months total.
- Assistance for households with no income or special circumstances could be extended to 18 months. An explanation of these special circumstances along with an evaluation of household needs must be documented in the client file.

Prevention Client Contribution Policy

It is the policy of Prevention Projects to provide a declining rental assistance subsidy to households participating in the Prevention Projects. For households with income, a percentage or amount of client contribution can be based on a reasonable percentage of a household's income.

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Rent Determination Procedures

Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their rent.

- Rental subsidy determinations will be evaluated no less than monthly in case
 management meetings. Case managers will review household budget and
 determine what, if any, amount of rent the household is responsible for contributing
 based upon the household's needs and circumstances. The case manager will
 document the outcome of the subsidy determination in the client file.
- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Utilities (ESG/CDBG)

Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their utilities.

- Utilities subsidy determinations will be evaluated no less than monthly in case management meetings. Case managers will review household budget and determine what, if any, amount of rent the household is responsible for contributing based upon the household's needs and circumstances. The case manager will document the outcome of the subsidy determination in the client file.
- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Housing Stabilization and/or Relocation Services (ESG/CDBG)

The type, amount, and duration of financial assistance for housing stabilization and/or relocation services will be determined based on the needs of the household. The need for this assistance will be evaluated and documented in the client file.

For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Required Documentation

Households receiving Homeless Prevention assistance must have a lease in the participant's

Documentation of the pending loss of housing can include an eviction notice, the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law. A court order is preferred, however, ESG and CDBG Recipients may allow sub-recipients to accept other documentation as allowed by HUD.

Assessment/ Prioritization

All homeless prevention projects are required to utilize the Coordinated Entry Process as outlined
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in the Coordinated Entry Written Standards Policies and Procedures.

HOUSING PROBLEM SOLVING

Definition

Housing Problem-Solving is an evidence-based approach that utilizes strengths-based conversations to explore options to assist individuals experiencing housing insecurity in avoiding homelessness or lengthy stays in shelters or on waitlists. HPS is not rooted in historically marginalizing practices and utilizes an equitable approach for all participants that is not contingent upon the same standardized assessment used for other housing resources, screening, eligibility, or prioritization and does not require significant financial resources. HPS techniques can be applied to any stage in the Coordinated Entry Process through open-ended, exploratory conversations designed to find solutions that are unique to the household's needs, resources, and housing stability goals.

Housing Problem-Solving techniques include:

- Exploring the unique strengths of each individual's household and support network.
- Identifying personal resources, mainstream supports and safe housing alternatives throughout Lucas County to divert individuals from experiencing homelessness.
- Connecting individuals to resources and services in the community.

Housing Problem Solving is intentionally built to be flexible and adaptable based on current funding sources. Please refer to the <u>Housing Problem Solving Policy Guide</u> for greater detail regarding usage and eligibility.

SUPPORTIVE SERVICES ONLY PROJECTS (SSO)

Definition

Supportive Services Only (SSO) projects provide services to sheltered and unsheltered homeless persons to whom the provider is not providing housing or housing assistance.

Eligibility

HUD Eligibility

Participants must meet the HUD definition of homelessness under Category 1 (Literally Homeless) or they may fall under Category 4 (Fleeing/Attempting to Flee DV) if they also meet the definition in Category 1.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.

Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

CoC Recommendations

SSO projects are expected to work with participants in order to connect them to permanent housing.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

- 1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

Assessment / Prioritization

Supportive Services Projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures.

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PERMANENT SUPPORTIVE HOUSING PROJECTS (PSH)

Definition

Permanent Supportive Housing (PSH) projects provide community-based housing and supportive services, without a predetermined length of stay, to assist homeless persons with a disability to live independently. The project will provide safe, affordable housing that meets participants' needs in accordance with HUD guidelines for permanent supportive housing projects.

Eligibility

HUD Requirements

In order to be served in a CoC-funded PSH project (individuals or family households) participants

must meet the following project eligibility requirements:

- Participants must meet the applicable HUD definition of homelessness (category 1 or category 4); and
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability.

ELIGIBILITY CRITERIA FOR DedicatedPLUS Projects (Section III.C.2.g of the FY 2022 CoC Program NOFO):

A DedicatedPLUS project is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals, households with children, and unaccompanied homeless youth that at intake meet one of the following categories:

- (1) experiencing chronic homelessness as defined in 24 CFR 578.3;
- (2) residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
- (3) residing in a place not meant for human habitation, emergency shelter, or safe haven and had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement and met the definition of chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
- (4) residing in transitional housing funded by a Joint TH and PH-RRH component project and who
 - were experiencing chronic homelessness as defined at 24 CFR 578.3;
- (5) residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions and the individual or head of household meets the definition of 'homeless individual with a disability'; or
- (6) receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove

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barriers to accessing services and housing that are experienced by homeless individuals and families.

Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need

intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

CoC Recommendations

Service Provision Criteria:

- 1. In providing or arranging for housing, the project considers the needs of the individual or family experiencing homelessness.
- 2. The project provides assistance in accessing suitable housing.
- 3. The project may provide assistance with moving costs.
- 4. The project signs occupancy agreements or leases (or subleases) with all project participants residing in housing.
- 5. The project enters into an occupancy agreement or lease agreement (or sublease) with project participant for a term of at least once year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month. Assistance may be extended as stated in 24 CFR 578.79.
- 6. For projects where regulations require individuals and families residing in permanent supportive housing to pay occupancy charges or rent, occupancy charges and rent may not exceed those specified in 24 CFR 578.77.
- 7. At least 90 percent of the CoC Program-funded permanent supportive housing beds that become available through turnover must be prioritized for chronically homeless individuals and families, or are in projects classified as DedicatedPLUS as defined in III.C.2.g. of HUD's 2022 CoC Program Competition NOFO. However, CoC-funded PSH projects that commit above this amount in a competition, are held to the higher amount.

In terminating assistance to a program participant, the interim rule provides that a recipient or subrecipient must provide a formal process that recognizes the due process of law. Recipients or subrecipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all circumstances in determining whether termination is appropriate. Under the Continuum of Care Interim Rule, it was determined that a participant's assistance should be terminated only in the most severe cases.

Required Documentation

As defined in the HEARTH Act, eligibility for Permanent Supportive Housing is limited to categories 1 and 4 (Fleeing/Attempting to Flee DV) if they also meet the definition in Category 1. Participants must also:

a. Enter from the street or shelter, or a transitional housing project to which they originally entered from the street or shelter (NOTE: if the project is designated for chronically homeless, they may only enter from the street or shelter. Individuals may Page 23 of 24 Approved TBD

- lose their chronically homeless designation after they are enrolled into a transitional housing project); and
- b. The head of household, or at least one member of the household, must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition*.

*HUD's Sample Chronic Homelessness Documentation – 2016 guidance, which includes a list of acceptable documentation to verify disability status, can be found at: https://www.hudexchange.info/resource/5182/sample-chronic-homelessness-documentation-checklist/

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

- 1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach or intake worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a Third-Party Verification, the case file must include documentation of due diligence to obtain third party verification. Appendix VI provides more details on exactly what is needed in the case file.

For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/Prioritization

Permanent Supportive Housing Projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures.

Recipients of CoC Program-funded PSH are required to follow the order of priority when selecting participants for housing in accordance with the OH-501 Toledo/Lucas County CoC's written standards while also considering the goals and any identified target populations served by the project in a manner that is consistent with their current grant agreement. These standards and the order of priority is listed below, and the OH-501 Toledo/Lucas County CoC approved Permanent Supportive Housing Written Standards and Chronic Prioritization policy is located in Appendix VI of this document.

Note: Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Permanent Supportive Housing. Such individual or family shall meet all eligibility criteria required by Federal law or regulation or HUD NOFO, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project.

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The individual or family shall retain their original homeless or chronically homeless status for the transfer.

A. Order of Priority in CoC Program-funded Permanent Supportive Housing Beds Dedicated to Persons Experiencing Chronic Homelessness and Permanent Supportive Housing Prioritized for Occupancy by Persons Experiencing Chronic Homelessness.

First Priority

Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs

Second Priority

Chronically Homeless Individuals and Families with the Longest History of

Homelessness

Third Priority

Chronically Homeless Individuals and Families with the Most Severe Service Needs

Fourth Priority

All Other Chronically Homeless Individuals and Families

Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness

First Priority

Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

Second Priority

Homeless Individuals and Families with a Disability with Severe Service

Needs Third Priority

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs

Fourth Priority

Homeless Individuals and Families with a Disability Coming from Transitional Housing

The OH-501 Toledo/Lucas County CoC adopts HUD's Notice CPD-16-11, Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing Notice issued on July 25, 2016, in that those experiencing chronic homelessness should be

given priority for non-dedicated PSH beds as vacancies become available through turnover. PSH renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance abuse issues) must continue to serve those groups, as required in the current grant agreement. However, the chronically homeless within the specified subpopulation should be prioritized for entry as described below. The full notice, which includes related recordkeeping requirements can be found at:

https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-

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<u>experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/</u> . This policy

supersedes previous policy adopting Notice CPD-14-012.

Prioritization of DedicatedPLUS Projects When There Are No Eligible Households

At the point in which a vacancy occurs, if there are no eligible households identified who are ready to accept assistance, recipients should consider the following:

- Where there are no chronically homeless persons identified, Dedicated PSH beds included in DedicatedPLUS projects may fill the vacancy either in accordance with section III.B.1.(b)-(d) of Notice CPD-16-11 or households eligible for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2022 CoC Program NOFO.
- Where there are no persons meeting the eligibility criteria for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2022 CoC Program NOFO, recipients should follow the order of priority outlined in section III.B.1.(b)-(d) of Notice CPD-16-11 to fill any vacancies. At a minimum, the CoC should consider the total length of time the potential program participant has been residing in a place not meant for human habitation, emergency shelter, or safe haven and severity of service needs.
- The recipient must always continue to prioritize households that are eligible for DedicatedPLUS (and dedicated PSH, if applicable). This means that anytime there is a new vacancy, the recipient must always first seek to fill it with an eligible household even if it was most recently used to serve a household that would not otherwise be eligible due to the circumstances outlined above.

For purposes of prioritization as referenced above in Section III.B.1.(b)-(d) of Notice CPD-16-11 (referenced from Appendix VIII of this document), the required order of prioritization is as follows for DedicatedPLUS projects, when there are no eligible households:

First Priority

Homeless Individuals and Families with a Disability with Severe Service

Needs Second Priority

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs

Third Priority

Homeless Individuals and Families with a Disability Coming from Transitional Housing

The overarching goal of adopting this Notice is to ensure that the homeless individuals and families with the most severe service needs within a community are prioritized in all PSH, which will also increase progress towards the OH-501 Toledo/Lucas County CoC's goal of ending chronic homelessness. This will also guide projects in ensuring that all CoC Program-funded PSH beds are used most effectively. HUD's Notice CPD-16-11, and this policy, revises the orders of priority related how persons should be selected for PSH as previously established in Notice CPD-14-012 to reflect the changes to the definition of chronically homeless as defined in the Chronically

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Homeless final rule.

Due diligence must be exercised when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their initial length of time homeless and/or the severity of their needs in the OH-501 Toledo/Lucas County CoC. Consistent with HUD's expectations for recipients of dedicated permanent supportive housing (PSH) projects, recipients of DedicatedPLUS projects will be expected to exercise due diligence when conducting outreach and assessment to locate and engage eligible households. HUD and the OH-501 Toledo/Lucas County CoC recognize that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing. Recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to maximum extent practicable, and recipients of DedicatedPLUS projects should be following a Housing First approach to the maximum extent practicable.

Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with sever service needs. Street outreach and housing providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

Recordkeeping Recommendations for the Orders of Priority in this Notice:

24 CFR 578.103(a)(4) of the <u>CoC Program Interim Rule</u> outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, the OH-501 Toledo/Lucas County CoC expects that CoC recipients of CoC Program- funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

- A. **Evidence of Severe Service Needs**. Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Appendix VI of the Written Standards using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.
- B. Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance. Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its
 - intake procedures when accepting new project participants into the project.
- C. Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.

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- a. When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.
- b. When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.
- c. Documentation for DedicatedPLUS Projects: Recipients of DedicatedPLUS PSH projects must maintain records to document efforts to locate persons meeting the eligibility criteria in Section III.C.2.g of the FY 2022 CoC Program NOFO. Ideally, the CoC should have comprehensive and high- quality data on all households that are currently presenting for assistance within the CoC that is informed by a comprehensive outreach strategy. To justify serving a non-eligible household, a recipient of DedicatedPLUS projects must have documentation from the CoC that demonstrates that outreach is occurring regularly and that the CoC is making reasonable efforts to locate and identify all persons experiencing homelessness within the community.

Appendix I: HUD Definition for "Homeless" Individual or Family

HUD CRITERIA FOR DEFINING HOMELESSNESS	Category 1	Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
			 Has a primary nighttime residence that is a public or private place not meant for human habitation;
			 Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing (only for ESG) and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
UD CRITERIA FO			 Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering
王			that institution
	Category 2	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that:
			 Residence will be lost within 14 days of the date of application for homeless assistance;
			 No subsequent residence has been identified; and
			 The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3	Homeless under other Federal statutes	 (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: Are defined as homeless under the other listed federal statutes; Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and Can be expected to continue in such status for an extended period of time due to special needs or barriers
4	Fleeing/ Attempting to Flee DV	 (4) Any individual or family who: Is fleeing, or is attempting to flee, domestic violence; Has no other residence; and Lacks the resources or support networks to obtain other permanent housing

Appendix II: HUD Definition for "At Risk of Homelessness":

			1	
				An individual or family who:
				Has an annual income below 30% of median family income for the area; AND
				Does not have sufficient resources or support networks,
	Category 1			e.g. family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND
				Meets one of the following conditions:
			A.	Has moved because of economic reasons 2 or more times during the 60 days immediately preceding their application for assistance; OR
NESS			B.	Is living in the home of another because of economic hardship; OR
HOMELESSI			C.	Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance; OR
R AT-RISK OI			D.	Lives in a hotel or motel and the cost of the hotel or motel stay is not covered by any federal, State, or local government programs for low-income assistance: OR
HUD DEFINITION FOR AT-RISK OF HOMELESSNESS			E.	Lives in a single-room occupancy or efficiency apartment unit in which there resides more than 2 persons or lives in a larger housing unit in which there reside more than 1.5 persons per room; OR
IUD DE			F.	Is exiting a publicly funded institution, or system of care;
T				OR
			G.	Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the recipient's approved
				Consolidated Plan.
	Category 2	Unaccompanied Children and Youth		A child or youth who does not qualify as homeless under HUD's "homeless" definition but qualifies as homeless under another federal statute as outlined in the CoC Interim Rule at 578.3.
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	3	Families with Children and Youth	A child or youth who does not qualify as "homeless" under HUD's homeless definition but does qualify as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with her or him.
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Appendix III: Eligibility by Component (CoC Program)

	Individuals and Families defined as Homeless under the following categories are eligible for assistance in SSO projects:
ve	 Category 1 – Literally Homeless
ortiv ces	Category 2 – Imminent Risk of Homeless
upp ervi	Category 3* – Homeless Under Other Federal Statutes
Se	Category 4 – Fleeing/Attempting to Flee DV
	Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects:
	Category 1 – Literally Homeless
	 Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
Re- housing	ESG-funded RRH projects have the following additional limitations on eligibility:
Rapid	 Must only serve individuals and families that have an annual income at or below 50% of AMI
sing	Individuals and Families defined as Homeless under the following categories are eligible for assistance in TH projects:
Hon	Category 1 – Literally Homeless
nal	Category 2 – Imminent Risk of Homeless
ansitio	 Category 3* – Homeless Under Other Federal Statutes (N/A OH-501 Toledo/Lucas County CoC*)
Ţ	Category 4 – Fleeing/Attempting to Flee DV
	Transitional Housing Rapid Re- housing Supportive Services

Individuals and families defined as Homeless under the following categories are eligible for assistance in PSH projects:

- Category 1 Literally Homeless
- Category 4 Fleeing/Attempting to Flee DV

PSH projects have the following additional NOFO limitations on eligibility within Category 1:

- Individuals and Families coming from TH must have originally come from the streets or emergency shelter
- Individuals and Families must also have an individual family member with a disability

Projects that are dedicated chronically homeless projects, including those that were originally funded as Samaritan Bonus Initiative Projects must continue to serve chronically homeless persons exclusively

Appendix IV: Eligibility by Category (Emergency Solutions Grant Program)

ELIGIBILITY BY COMPONENT (Emergency Solutions Grants Street Outreach

Individuals defined as Homeless under the following categories are eligible for assistance in SO:

- Category 1 Literally Homeless
- Category 4 Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)

SO projects have the following additional limitations on eligibility within Category 1:

 Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter

Permanent Supportive Housing

^{*} Projects must be located within a CoC that has received HUD approval to serve this category. For more information about receiving HUD approval, please read: Notice on Limitation on Use of Funds to Serve Persons Defined as Homeless Under Other Federal Laws at: https://www.hudexchange.info/resource/1988/notice-limitation-use-funds-serve-persons-defined-homeless-other-laws/. Category 3 is not applicable for OH-501 Toledo/Lucas County CoC-funded programs.

Emergency Shelter	Individuals and Families defined as Homeless under the following categories are eligible for assistance in ES projects: • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3 – Homeless Under Other Federal Statutes
ū	 Category 4 – Fleeing/Attempting to Flee DV
	Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects:
	 Category 1 – Literally Homeless
- housing	 Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
Rapid Re-	ESG-funded RRH projects have the following additional limitations of eligibility:
8	 Must only serve individuals and families that have an annual income at or below 50% of AMI

Individuals and Families defined as Homeless under the following categories are eligible for assistance in HP projects:

- Category 2 –Imminent Risk of Homeless
- Category 3 Homeless Under Other Federal Statutes
- Category 4 Fleeing/Attempting to Flee DV

Individuals and Families who are defined as At Risk of Homelessness are eligible for assistance in HP projects.

HP projects have the following additional limitations on eligibility with homeless and at risk of homeless:

 Must only serve individuals and families that have an annual income below 30% of AMI

Homelessness Prevention

Appendix V: Eligibility Documentation Requirements for ESG and CoC Program-funded Projects

As set forth in the HEARTH Act, there are four categories of eligibility: 1) Literally Homeless, 2) Imminent Risk of Homelessness, 3) Homeless Under Other Federal Statutes (subject to limitation in the OH-501 Toledo/Lucas County CoC), and 4) Fleeing/Attempting to Flee Domestic Violence. Projects located within the OH-501 Toledo/Lucas County Continuum of Care jurisdiction are limited to serving categories 1, 2, and 4 due to the shortage of resources for those priority populations and excessive demand. Category two is further limited to those who will be literally homeless within

14 days, aligning eligibility with the Emergency Solutions Grant. Documentation for those at risk of homelessness may also be accepted as allowed under Category 1: Risk Factor (C) of the At Risk of Homelessness definition as allowed by HUD.

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as noted in the table on the following page:

			a. Third party verification (HMIS print-out, or written
		Literally Homeless	referral/certification by another housing or service provider); OR
			b. Written observation by an outreach worker; OR
NTS			c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
IREME			d. For individuals exiting an institution – one of the forms of evidence above and;
IQUI			i. Discharge paperwork or written/oral referral, or
EPING RE			ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited the institution
RECORDKE			If the provider is using anything other than Third Party Verification, the case file must include documentation of due
N/N			diligence to obtain third party verification.
NTATIO	1: Risk Factor (C)	Category 1: Risk	Eligibility documentation for Category 1: Risk Factor (C) of the At-Risk of Homelessness definition does not need to be equivalent to a court- ordered eviction action. Acceptable
ELIGIBILITY DOCUMENTATION/RECORDKEEPING REQUIREMENTS		(C) of the At- Risk of Homelessness	documentation must substantiate that a household's right to occupy housing will be terminated within 21 days, not necessarily that the household will be required to leave the unit within 21 days.
ELIGIBILIT			In order to sufficiently document that the criteria for Category 1C have been met, other documentation, such as an eviction notice prepared by the landlord or a demand notice, must effectively terminate a household's right to occupy the unit within 21 days. If the documentation provides a way for the tenant to remedy the situation and avoid eviction, e.g., paying the balance, the applicant must lack the ability to meet the terms of avoiding eviction in order to be eligible for assistance.

Category	Imminent Risk of Homelessness	 A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; OR 				
2		 For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; OR 				
		 c. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; AND 				
		 d. Certification that no subsequent residence has been identified; 				
		AND				
		e. Self-certification or other written documentation that the individual lacks the financial resources and support necessary				
		to obtain permanent housing.				
Category		CoC-funded projects - N/A (Ineligible)				
3		ESG-funded projects (ONLY shelter or prevention IF allowed):				
		 i. Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; AND 				
		ii. Certification of no PH in the last 60 days; AND				
		 iii. Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the last 60 days; AND 				
		iv. Documentation of special needs or 2 or more barriers				

		For victim service providers:
Category 4	Fleeing/ Attempting to Flee DV	i. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self- certification or a certification by the intake worker.
		For non-victim service providers:
		 Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; AND
		 ii. Certification by the individual or head of household that no subsequent residence has been identified; AND
		iii. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Appendix. VI: Permanent Supportive Housing Written Standards & Chronic Prioritization

PERMANENT SUPPORTIVE HOUSING PROJECTS (PSH)

Permanent Supportive Housing (PSH) projects provide community-based housing and supportive services, without a predetermined length of stay, to assist homeless persons with a disability to live independently.

STANDARD:

The project will provide safe, affordable housing that meets participants' needs in accordance with

HUD guidelines for permanent supportive housing projects.

SERVICE PROVISION CRITERIA:

- 2. In providing or arranging for housing, the project considers the needs of the individual or family experiencing homelessness.
- 3. The project provides assistance in accessing suitable housing.
- 4. The project may provide assistance with moving costs.
- 5. The project signs occupancy agreements or leases (or subleases) with all project participants residing in housing.
- 6. The project enters into an occupancy agreement or lease agreement (or sublease) with project participant for a term of at least once year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month. Assistance may be extended as stated in 24 CFR 578.79.
- 7. For projects where regulations require individuals and families residing in permanent supportive housing to pay occupancy charges or rent, occupancy charges and rent may not exceed those specified in 24 CFR 578.77.
- 8. At least 90 percent of the CoC Program-funded permanent supportive housing beds that become available through turnover must be prioritized for chronically homeless individuals and families, or are in projects classified as DedicatedPLUS as defined in III.C.2.g. of HUD's 2022 CoC Program Competition NOFO. However, CoC-funded PSH projects that commit above this amount in a competition, are held to the higher amount.

ELIGIBILITY CRITERIA:

In order to be served in a CoC-funded PSH project (individuals or family households) participants must meet the following program eligibility requirements:

- Participants must meet the applicable HUD definition of homelessness (category 1 or category 4); and
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability.

ELIGIBILITY CRITERIA FOR DedicatedPLUS Projects (Section III.C.2.g of the FY 2022 CoC Program NOFO): A DedicatedPLUS project is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless

youth that at intake are:

- 1. Experiencing chronic homelessness as defined in 24 CFR 578.3;
- 2. Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
- 3. Residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR
 - 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
- 4. residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
- 5. residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
- 6. receiving assistance through a Department of Veterans Affairs(VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

Priority is given to chronically homeless individuals and families as defined by HUD, where a family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of the chronically homeless definition as described on page 6 of this appendix, including a family whose composition has fluctuated while the head of household has been homeless. Please note that to meet the criteria set forth in the chronically homeless definition, in addition to meeting criteria around literal homelessness and length of time homeless, the statutory definition also requires that the head of household has a diagnosable disability as determined in the final rule.

Recipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all circumstances in determining whether termination is appropriate. Under the Continuum of Care Interim Rule, it was determined that a participant's assistance should be terminated only in the most severe cases.

The OH-501 Toledo/Lucas County CoC adopts HUD's Notice CPD-16-11, Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing Notice issued on July 25, 2016, in that those experiencing chronic homelessness should be given priority for non-dedicated PSH beds as vacancies become available through turnover. PSH renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance abuse issues) must continue to serve those groups, as required in the current grant agreement. However, the chronically homeless within the specified subpopulation should be prioritized for entry as described below.

As updated in HUD's 2022 CoC Program Competition NOFO, a permanent supportive housing bed that is dedicated specifically for use by chronically homeless individuals and families within a CoC's

geographic area, as reported in the CoC's HIC and the FY 2022 PH project applications, must be filled by

another chronically homeless participant unless there are no chronically homeless persons located within the CoC's geographic area. This concept only applies to permanent supportive housing projects. This policy update is being made to policy adopting Notice CPD-16-11. Additional information can be found within the full notice at: https://www.hud.gov/sites/documents/16-11CPDN.PDF.

The overarching goal of adopting this Notice is to ensure that the homeless individuals and families with the most severe service needs within a community are prioritized in all PSH, which will also increase progress towards the OH-501 Toledo/Lucas County CoC's goal of ending chronic homelessness. This will also guide projects in ensuring that all CoC Program-funded PSH beds are used most effectively.

HUD's Notice CPD-16-11, and this policy, revises the orders of priority related how persons should be selected for PSH as previously established in Notice CPD-14-012 to reflect the changes to the definition of chronically homeless as defined in the Chronically Homeless final rule.

Recipients of CoC Program-funded PSH are required to follow the order of priority when selecting participants for housing in accordance with the OH-501 Toledo/Lucas County CoC's written standards while also considering the goals and any identified target populations served by the project, in a manner consistent with their current grant agreement.

Due diligence must be exercised when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs in the OH-501 Toledo/Lucas County CoC. Consistent with HUD's expectations for recipients of dedicated permanent supportive housing (PSH) projects, recipients of DedicatedPLUS projects will be expected to exercise due diligence when conducting outreach and assessment to locate and engage eligible households as outlined in Section

III.C.2.g. of the FY 2022 CoC Program NOFO. HUD and the OH-501 Toledo/Lucas County CoC recognize that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing.

Recipients of CoC Program- funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH.

CoC Program-funded PSH providers are encouraged to follow a Housing First approach to maximum extent practicable, and recipients of DedicatedPLUS projects should be following a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with sever service needs.

Street outreach and housing providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

PRIORITIZATION of CHRONICALLY HOMELESS

Order of Priority in CoC Program-funded Permanent Supportive Housing

As a reminder, recipients of CoC Program-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Project implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

Note: Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Permanent Supportive Housing. Such individual or family shall meet all eligibility criteria required by Federal law or regulation or HUD NOFO, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project. The individual or family shall retain their original homeless or chronically homeless status for the transfer.

A. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic.

First Priority:

Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.

A chronically homeless individual or head of household as defined in 24 CFR Parts 91 and 578, for whom both of the following are true:

- 1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and
- 2. The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs (see Section I.D.3. of this Notice for definition of severe service needs).

Second Priority:

Chronically Homeless Individuals and Families with the Longest History of Homelessness.

A chronically homeless individual or head of household, as defined in 24 CFR Parts 91 and 578, for which both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,

2. The CoC or CoC program recipient has <u>not</u> identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Third Priority:

Chronically Homeless Individuals and Families with the Most Severe Service Needs.

A chronically homeless individual or head of household as defined in 24 CFR Parts 91 and 578, for whom both of the following are true:

- The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than 12 months; and
- 2. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Fourth Priority:

All Other Chronically Homeless Individuals and Families.

A chronically homeless individual or head of household as defined in 24 CFR Parts 91 and 578, for whom both of the following are true:

- 1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length the four occasions is **less than** 12 months; and
- 2. The CoC or CoC program recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Where a CoC or a recipient of CoC Program-funded PSH beds that are dedicated or prioritized is not able to identify chronically homeless individuals and families as defined in 24 CFR Parts 91 and 578 within the CoC, the order of priority in the section below (*B. Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness*) may be followed.

B. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

First Priority:

Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

Second Priority:

Homeless Individuals and Families with a Disability Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Third Priority:

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Fourth Priority:

Homeless Individuals and Families with a Disability Coming from Transitional Housing.

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

C. Prioritization of DedicatedPLUS Projects When There Are No Eligible Households

At the point in which a vacancy occurs, if there are no eligible households identified who are ready to accept assistance, recipients should consider the following:

- Where there are no chronically homeless persons identified, Dedicated PSH beds included in DedicatedPLUS projects may fill the vacancy *either* in accordance with section III.B.1.(b)-(d) of Notice CPD-16-11 or households eligible for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2022 CoC Program NOFO.
- Where there are no persons meeting the eligibility criteria for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2022 CoC Program NOFO, recipients should follow the order of priority outlined in section III.B.1.(b)-(d) of Notice CPD-16-11 to fill any vacancies. At a minimum, the CoC should consider the total length of time the potential program participant has been residing in a place not meant for human habitation, emergency shelter, or safe haven and severity of service needs.
- The recipient must always continue to prioritize households that are eligible for DedicatedPLUS (and dedicated PSH, if applicable). This means that anytime there is a new vacancy, the recipient must always first seek to fill it with an eligible household even if it was most recently used to serve a household that would not otherwise be eligible due to the circumstances outlined above.

For purposes of prioritization as referenced above in Section III.B.1.(b)-(d) of Notice CPD-16-11 (referenced from Appendix VIII of this document), the required order of prioritization as follows for DedicatedPLUS projects, when there are no eligible households:

First Priority:

Homeless Individuals and Families with a Disability Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Second Priority:

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Third Priority:

Homeless Individuals and Families with a Disability Coming from Transitional Housing.

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This

priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

PROCEDURE:

Permanent Supportive Housing Projects will be required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures.

Key Terms:

Homeless means (To be eligible for permanent supportive housing, people must meet the federal criteria under category [1] or [4] of the "homeless" definition in 24 578.3):

- 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Disabling Condition (Disability) means:

- A person shall be considered to have a disabling condition if he or she has a condition that:
 - Is expected to be long-continuing or of indefinite duration;
 - Substantially impedes the individual's ability to live independently;
 - Could be improved by the provision of more suitable housing conditions; and
 - Can be diagnosed as one or more of the following conditions: substance abuse disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), posttraumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability (page 53, CoC Interim Rule).
- A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).

Chronically Homeless means:

- A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - o Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - o Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a

break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

- An individual who has been residing in an institutional care facility, including a
 jail, substance abuse or mental health treatment facility, hospital, or other
 similar facility, for fewer than 90 days and met all of the criteria in paragraph
 (a) of this definition, before entering that facility; or
- A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition described above, including a family whose composition has fluctuated while the head of household has been homeless.

HUD's Sample Chronic Homelessness Documentation – 2016 guidance can be found at: https://www.hudexchange.info/resources/documents/Sample-Chronic-Homelessness-Documentation-Form-2016.docx.

Housing First means:

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold). HUD encourages all recipients of CoC Program- funded PSH to follow a Housing First approach to the maximum extent practicable.

Any CoC-funded recipient/subrecipient that indicated that they would follow a Housing First approach in a CoC Project Application must continue to do so in subsequent years, as the CoC score for that CoC Program Competition was affected by the extent in which project applications indicated that they would follow this approach and this requirement will be incorporated into the recipient's HUD grant agreement.

Severity of Service Needs means (as defined in HUD Notice CPD-16-11, these PSH written standards refer to persons who have been identified as having the most severe service needs):

- (a) For the purpose of these standards, this means an individual for whom at least one of the following is true:
 - i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
 - iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
 - iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.
- (b) Severe service needs as defined in paragraphs i. iv. above should be identified and verified through data- driven methods such as an administrative data match or through the use of a
- standardized assessment tool and process and should be documented in a project participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see C.F.R.

§ 5.105(a). Recordkeeping Recommendations for the Orders of Priority in this Notice:

24 CFR 578.103(a)(4) of the <u>CoC Program Interim Rule</u> outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, the OH-501 Toledo/Lucas County CoC expects that CoC recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

- A. **Evidence of Severe Service Needs.** Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in this section of the Written Standards using data- driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.
- B. Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance. Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new project participants into the project.

C. Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.

- (a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.
- (b) When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.
- (c) <u>Documentation for DedicatedPLUS Projects:</u> Recipients of DedicatedPLUS PSH

projects must maintain records to document efforts to locate persons meeting the eligibility criteria in Section III.C.2.g of the FY 2022 CoC Program NOFO. Ideally, the CoC should have

comprehensive and high- quality data on all households that are currently presenting for assistance within the CoC that is informed by a comprehensive outreach strategy. To justify serving a non-eligible household, a recipient of DedicatedPLUS projects must have documentation from the CoC that demonstrates that outreach is occurring regularly and that the CoC is making reasonable efforts to locate and identify all persons experiencing homelessness within the community.

Appendix VII: Recordkeeping Requirements Documenting "Chronic Homelessness"

Documenting time spent living in a	a.	Third party verification (HMIS print-out, written observation by an outreach worker of the conditions where the individual was living, or written referral/certification by another housing or service provider) should be obtained for at least 9 of the required 12 month homeless period;
meant for human	b.	Up to 3 months of homelessness may be documented through self- certification;
habitation, an emergency shelter, or a	c.	A single encounter with a service provider in a month is sufficient to consider the household homeless for the entire month unless there is evidence of a break;
sale llavell	d.	If third party documentation cannot be obtained, a written record of the intake worker's due diligence to obtain it, the worker's documentation of the living situation, and the individual's self- certification may suffice;
	e.	Up to 25% of the participants served during the project's operating year may self-certify for the full 12 months but this should be limited to rare and extreme cases and the intake worker must document their due diligence in obtaining other documentation and why it was not received.
Documenting time spent in	a.	Discharge paperwork or written or oral referral from a social worker, case manager, or other appropriate official stating the beginning and ending dates of the individual's stay in the facility; OR
institutions	b.	Where third party verification is not attainable, the written record of the intake worker's due diligence to obtain it and the individual's self-certification that he or she is exiting an institutional care facility where they resided less than 90 days.
Documenting breaks in homelessness	a. b.	Third party verification; OR Self-reporting by the individual seeking assistance. It is acceptable for all breaks to be documented through self-reporting.
	time spent living in a place not meant for human habitation, an emergency shelter, or a safe haven Documenting time spent in institutions Documenting breaks in	Documenting time spent living in a place not meant for human habitation, an emergency shelter, or a safe haven d. Documenting time spent in institutions b. Documenting a. breaks in

			This must be third party, and includes:
th	ocumenting ne existence f a disability	a.	Written verification form a professional licensed by the State to diagnose and treat the disability and certification that the disability expected to be long- continuing or of indefinite duration and substantially impedes the individual's ability to live independently; OR
		b.	Written verification from SSA; OR
		c.	The receipt of a disability check; OR
		d.	Intake staff recorded observation of a disability that is confirmed and accompanied by evidence outlined in a-c above within 45 days.

Recipients and subrecipients of CoC Program funds are required to maintain and follow written intake procedures to ensure compliance with the "chronically homeless" definition as described in the final rule at: https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/

Appendix VIII: HUD CPD-16-11 Notice Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing



U.S. Department of Housing and Urban Development Office of Community Planning and Development

1

Special Attention of:

All Secretary's Representatives

Issued:

All Regional Directors for CPD

Expires:

All CPD Division

Directors

Continuums of

Care (CoC)

Recipients of the Continuum of Care (CoC)Program

Issued: July 25, 2016

Expires: This Notice is effective until it is amended, superseded, or rescinded

Cross Reference: 24 CFR Parts 578 and 42 U.S.C. 11381, et seq.

Subject: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing

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I. Purpose

This Notice supersedes Notice CPD-14-012 and provides guidance to Continuums of Care (CoC) and recipients of Continuum of Care (CoC) Program (24 CFR part 578) funding for permanent supportive housing (PSH) regarding the order in which eligible households should be served in **all** CoC Program-funded PSH. This Notice reflects the new definition of chronically homeless as defined in CoC Program interim rule as amended by the Final Rule on Defining "Chronically Homeless" (herein referred to as the Definition of Chronically Homeless final rule) and updates the orders of priority that were established under the prior Notice. CoCs that previously adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the FY2015 CoC Program Competition are encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. CoCs that have not previously adopted the orders of priority established in Notice CPD- 14-012 are also encouraged to incorporate the orders of priority included in this Notice into their written standards

A. Background

In June 2010, the Obama Administration released *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (Opening Doors)*, in which HUD and its federal partners set goals to end Veteran and chronic homelessness by 2015, and end family and youth homelessness by 2020. Although progress has been made there is still a long way to go. In 2015, the United States Interagency Council on Homelessness extended the goal timeline for achieving the goal of ending chronic homelessness nationally from 2015 to 2017. In 2015, there were still 83,170 individuals and 13,105 persons in families with children that were identified as chronically homeless in the United States. To end chronic homelessness, it is critical that CoCs ensure that limited resources awarded through the CoC Program Competition are being used in the most effective manner and that households that are most in need of assistance are being prioritized.

Since 2005, HUD has encouraged CoCs to create new PSH dedicated for use by persons experiencing chronic homelessness (herein referred to as dedicated PSH). As a result, the number of dedicated PSH beds funded through the CoC Program for persons experiencing chronic homelessness has increased from 24,760 in 2007 to 59,329 in 2015. This increase has contributed to a 30.6 percent decrease in the number of chronically homeless persons reported in the Point-in-Time Count between 2007 and 2015. Despite the overall increase in the number of dedicated PSH beds, this only represents 31.6 percent of all CoC Program- funded PSH beds.

To ensure that all PSH beds funded through the CoC Program are used as strategically and effectively as possible, PSH needs to be targeted to serve persons with the highest needs and greatest barriers towards obtaining and maintaining housing on their own—persons experiencing chronic homelessness.

HUD's experience has shown that many communities and recipients of CoC Program- funded PSH

continue to serve persons on a "first-come, first- serve" basis or based on tenant selection processes that screen-in those who are most likely to succeed while screening out those with the highest level of need. These approaches to tenant selection have not been effective in reducing chronic homelessness, despite the increase in the number of PSH beds nationally.

B. Goals of this Notice

The overarching goal of this Notice is to ensure that those individuals and families who have spent the longest time in places not meant for human habitation, in emergency shelters, or in safe havens and who have the most severe service needs within a community are prioritized for PSH. By ensuring that persons with the longest histories of homelessness and most severe service needs are prioritized for PSH, progress towards the Obama Administration's goal of ending chronic homelessness will increase. In order to guide CoCs in ensuring that all CoC Program- funded PSH beds are used most effectively, this Notice revises the orders of priority related to how persons should be selected for PSH as previously established in Notice CPD-14- 012 to reflect the changes to the definition of chronically homeless as defined in the Definition of Chronically Homeless final rule. CoCs are strongly encouraged to adopt and incorporate them into the CoC's written standards and coordinated entry process.

HUD seeks to achieve two goals through this Notice:

- 1. Establish a recommended order of priority for dedicated and prioritized PSH which CoCs are encouraged to adopt in order to ensure that those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service needs are given first priority.
- 2. Establish a recommended order of priority for PSH that is not dedicated or prioritized for chronic homelessness in order to ensure that those persons who do not yet meet the definition of chronic homelessness but have the longest histories of homelessness and the most severe service needs, and are therefore the most at risk of becoming chronically homeless, are prioritized.

C. Applicability

The guidance in this Notice is provided to all CoCs and all recipients and subrecipients of CoC Program funds—the latter two groups referred to collectively as recipients of CoC Program- funded PSH. CoCs are strongly encouraged to incorporate the order of priority described in this Notice into their written standards, which CoCs are required to develop per 24 CFR 578.7(a)(9), for their CoC Program-funded PSH.

Recipients of CoC Program funds are required to follow the written standards for prioritizing assistance established by the CoC (see 24 CFR 578.23(c)(10)); therefore, if the CoC adopts these recommended orders of priority for their PSH, all recipients of CoC Program-funded PSH will be required to follow them as required by their grant agreement. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Lastly, where a CoC has chosen to not adopt HUD's recommended orders of priority into their written standards, recipients of CoC Program- funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

D. Key Terms

- 1. Housing First. A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold). HUD encourages all recipients of CoC Program-funded PSH to follow a Housing First approach to the maximum extent practicable.
- **2. Chronically Homeless.** The definition of "chronically homeless", as stated in Definition of Chronically Homeless final rule is:
 - (a) A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;
 - **(b)** An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph
 - (a) of this definition, before entering the facility;
 - (c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has

fluctuated while the head of household has been homeless.

- **3. Severity of Service Needs.** This Notice refers to persons who have been identified as having the most severe service needs.
 - (a) For the purposes of this Notice, this means an individual for whom at least one of the following is true:
 - i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or
 - **ii.** Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
 - **iii.** For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
 - iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high- need, high cost beneficiaries.
 - (b) Severe service needs as defined in paragraphs i.-iv. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a program participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a)
- II. Dedication and Prioritization of Permanent Supportive Housing Strategies to Increase Number of PSH Beds Available for Chronically Homeless Persons
 - **A.** Increase the number of CoC Program-funded PSH beds that are dedicated to persons experiencing chronic homelessness.

Dedicated PSH beds are those which are required through the project's grant agreement to only be used to house persons experiencing chronic homelessness unless there are no persons within the CoC that meet that criteria. If there are no persons

within the CoC's geographic area that meet the definition of chronically homeless at a point in which a dedicated PSH bed is vacant, the recipient may then follow the order of priority for non- dedicated PSH established in this Notice, if it has been adopted into the CoC's written standards. The bed will continue to be a dedicated bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the CoC's geographic area at that time. These PSH beds are also reported as "CH Beds" on a CoC's Housing Inventory Count (HIC).

B. Prioritize non-dedicated PSH beds for use by persons experiencing

chronic homelessness.

Prioritization means implementing an admissions preference for chronically homeless persons for CoC Program-funded PSH beds. During the CoC Program competition project applicants for CoC Program-funded PSH indicate the number of non-dedicated beds that will be prioritized for use by persons experiencing chronic homelessness during the operating year of that grant, when awarded. These projects are then required to prioritize chronically homeless persons in their non-dedicated CoC Program-funded PSH beds for the applicable operating year as the project application is incorporated into the grant agreement. All recipients of non-dedicated CoC Program- funded PSH are encouraged to change the designation of their PSH to dedicated, however, at a minimum are encouraged to prioritize the chronically homeless as beds become vacant to the maximum extent practicable, until there are no persons within

the CoC's geographic area who meet that criteria. Projects located in CoCs where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified area.

For example, if a OH-501 Toledo/Lucas County CoC has chosen to divide the CoC into six distinct regions for purposes of planning and housing and service delivery, each region would only be expected to prioritize assistance within its specified geographic area.1

The number of non-dedicated beds designated as being prioritized for the chronically homeless may be increased at any time during the operating year and may occur without an amendment to the grant agreement.

III. Order of Priority in CoC Program-funded Permanent Supportive Housing

The definition of chronically homeless included in the final rule on "Defining Chronically Homeless", which was published on December 4, 2015 and went into effect on January 15, 2016, requires an individual or head of household to have a disability and to have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for at least 12 months either continuously or cumulatively over a period of at least 4 occasions in the last 3 years. HUD encourages all CoCs adopt into their written standards the following orders of priority for all CoC Program-funded PSH. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Where a CoC has chosen to not incorporate HUD's recommended orders of priority into their written standards, recipients of CoC Program- funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

As a reminder, recipients of CoC Program-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Program implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

- **A.** Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic Homelessness
 - 1. CoCs are strongly encouraged to revise their written standards to include an order of priority, determined by the CoC, for CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness that is based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual's or family's service needs. Recipients of CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness would be required to follow that order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.
 - 2. Where there are no chronically homeless individuals and families within the CoC's geographic area, CoCs and recipients of CoC Program-funded PSH are encouraged to follow the order of priority in Section III.B. of this Notice. For projects located in CoC's where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified sub-CoC area. 2
 - **3.** Recipients of CoC Program-funded PSH should follow the order of priority above while also considering the goals and any identified target populations served by the project. For example, a CoC Program-funded PSH project that is permitted to target homeless persons with a serious mental illness should follow the order of priority under Section
 - III.A.1. of this Notice to the extent in which persons with serious mental illness meet the criteria. In this example, if there were no persons with a serious mental illness that also met the criteria of chronically homeless within the CoC's geographic area, the recipient should follow the order of priority under Section III.B for persons with a serious mental illness.
 - **4.** Recipients must exercise due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might

require significant engagement and contacts prior to their entering housing and recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

- **B.** Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Persons Experiencing Chronic Homelessness
 - 1. CoCs are strongly encouraged to revise their written standards to include the following order of priority for non-dedicated and non-prioritized PSH beds. If adopted into the CoCs written standards, recipients of CoC Program-funded PSH that is not dedicated or prioritized for the chronically homeless would be required to follow this order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.
 - (a) First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

(b) Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(c) Third Priority—Homeless Individuals and Families with a Disability

Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

- (d) Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing.
- 1. An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.
- 2. Recipients of CoC Program-funded PSH should follow the order of priority above, as adopted by the CoC, while also considering the goals and any identified target populations served by the project. For example, non-dedicated or non-prioritized CoC Program-funded PSH that is permitted to target youth experiencing homelessness should follow the order of priority under Section III.B.1. of this Notice, as adopted by the CoC, to the extent in which youth meet the stated criteria.
- 3. Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described in this Notice, and as adopted by the CoC. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH (see FAQ 1895). Recipients of CoC Program-funded PSH are encouraged to follow a Housing First approach to the maximum extent practicable. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these individuals and families must continue to be prioritized until they are housed.

IV. Using Coordinated Entry and a Standardized Assessment Process to Determine Eligibility and Establish a Prioritized Waiting List

A. Coordinated Entry Requirement

Provisions at 24 CFR 578.7(a)(8) requires that each CoC, in consultation with recipients of Emergency Solutions Grants (ESG) program funds within the CoC's geographic area, establish and operate either a centralized or coordinated assessment system (referred to in this Notice as coordinated entry or coordinated entry process) that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. CoCs that adopt the order of priority in Section III of this Notice into the CoC's written standards are strongly encouraged to use a coordinated entry process to ensure that there is a single prioritized list for all CoC Program-funded PSH within the CoC. The Coordinated Entry Policy Brief, provides recommended criteria for a quality coordinated entry process and standardized assessment tool and process. Under no circumstances shall the order of priority be based upon diagnosis or disability type, but instead on the length of time an individual or family has been experiencing homelessness and the severity of needs of an individual or family.

B. Written Standards for Creation of a Single Prioritized List for PSH

CoCs are also encouraged to include in their policies and procedures governing their coordinated entry system a requirement that all CoC Programfunded PSH accept referrals only through a single prioritized list that is created through the CoCs coordinated entry process, which should also be informed by the CoCs street outreach. Adopting this into the CoC's policies and procedures for coordinated entry would further ensure that CoC Program-funded PSH is being used most effectively, which is one of the goals in this Notice. The single prioritized list should be updated frequently to reflect the most up-to-date and real-time data as possible.

C. Standardized Assessment Tool Requirement

CoCs must utilize a standardized assessment tool, in accordance with 24 CFR 578.3, or process. The <u>Coordinated Entry Policy Brief</u>, provides recommended criteria for a quality coordinated entry process and standardized assessment tool.

D. Nondiscrimination Requirements

CoCs and recipients of CoC Program-funded PSH must continue to comply with the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities

Act, as applicable. See 24 C.F.R. § 5.105(a).

V. Recordkeeping Recommendations for CoCs that have Adopted the Orders of Priority in this Notice

24 CFR 578.103(a)(4) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, HUD expects that where CoCs have adopted the orders of priority in Section III. of this Notice into their written standards. The CoC, as well as recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

- A. Evidence of Severe Service Needs. Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Section I.D.3. of this Notice using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case- conferencing decisions.
- **B.** Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance. Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new program participants into the project.
- **C.** Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.
- (a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area or for those CoCs that implement a sub-CoC 3planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this

- condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.
- (b) When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.

VI. Questions Regarding this Notice

Questions regarding this notice should be submitted to HUD Exchange Ask A Question (AAQ) Portal at: https://www.hudexchange.info/get- assistance/my-question/.

3 For the State of Louisiana grant originally awarded pursuant to "Department of Housing and Urban Development— Permanent Supportive Housing" in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110–252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.

Recommended by Housing Collaborative Network on 14 August 2012/Approved by Toledo Lucas County Homelessness Board on 22 August 2012/

Amended version recommended by HCN on 18 October 2017/Amended by Toledo Lucas County Homelessness Board on 15 November 2017

Toledo Lucas County Continuum of Care: Recommendations for Centralized Approach to Coordinated Access/Entry

Prepared by:

Original: Terry Biel – Technology Director, Toledo Lucas County Homelessness Board Revisions: Mike Badik - Executive Director, Toledo Lucas County Homelessness Board

What is a Centralized Approach to Coordinated Access/Entry (Centralized CE Approach)

Under a Centralized CE Approach, households may enter the system in a variety of ways. However, these all ultimately involve connecting households to a single, centralized point to receive the bulk of Screening, Diversion, and Temporary Placement services. In our community, a Centralized CE Approach is the "best fit" for Centralized CE with United Way 2-1-1 center serving as the single, centralized point for access/entry.

Emergency Shelter

Under this model, Emergency Shelters should not simply turn away walk-ins. If walk-ins present, Emergency Shelter staff should provide initial Screening to try to find a brief resolution to the household's housing crisis. If this initial Screening does not result in a resolution to their housing crisis and the client is not in need of acute crisis services, the shelter assist the presenter to contact 2-1-1.

Phone calls to shelters for request for placement in their emergency shelter should be redirected to 2-1-1 once it has been established that they are not in need of acute crisis services.

Conversely, households determined to be in-need of emergency shelter by Coordinated Access/Entry will be referred to participating shelters. In the case of shelters using ServicePoint, Centralized CE Approach will check for capacity the emergency shelter before making a referral, and confirm availability as needed. The details of this handoff process must be arranged between Centralized CE Approach and the participating shelters collaboratively.

Diversion and Homelessness Prevention

Rapid Re-Housing, Permanent Supportive Housing and Homeless Prevention providers should direct all walk-ins and other inquiries to 2-1-1.

Recommendations for Centralized Approach to Coordinated Access-Entry/Approved by Toledo Lucas County Homelessness Board on 22 August 2012/

Amended version recommended by HCN on 18 October 2017/Amended by Toledo Lucas County Homelessness Board on 15 November 2017 Page 1 of 7

Households determined to be in-need of and eligible for Temporary Placement services will be referred to participating providers by Centralized CE Approach. The details of this handoff process must be arranged between Centralized CE Approach and the participating shelters collaboratively.

The centralized system will make use of a combination of United Way 2-1-1 Community Resource Navigator Specialist staff (CRNS) and two Coordinated Entry (CE) specialists. CRNS should be trained to provide the centralized Screening and to administer the modified VI-SPDAT. Once a client with a housing instability has cleared the initial Screening for safety concerns, the call should be elevated to CE specialists for Diversion and Homelessness Prevention components. These same CE specialists should provide the assessment for Diversion and Homelessness Prevention services.

Temporary Shelter

If the CE specialists are unable to divert or prevent homelessness, the CE specialists will review the modified VI-SPDAT results, the bed availability at the appropriate shelter(s), any wait list and temporary shelter criteria before authorizing a temporary shelter placement or waiting list referral. In filling an empty bed(s), the CE specialists will identify the person or family being highest on the priority at the time of the bed opening using the order of priority. When contacting the next highest prioritized person or family, the CE specialists will contact that person or head of household and offer available options. If a person or family does not choose to take advantage of any offer, the CE specialists will document the decline in HMIS. The person or family will not be sanctioned for future offers.

With an accepted offer, the TLCHB will contact the temporary shelter agency or entity and present that agency or entity with the referral. If, for any reason, a provider should determine that a referred case is ineligible or inappropriate for their programs, Centralized CE Approach and that provider must work jointly to make a more appropriate referral. The CE specialists will also provide HMIS access for the referred agency

Transportation assistance may be required in some cases, and should be budgeted appropriately.

Assessment

If a person or family has been placed in a temporary shelter, the shelter staff will perform an intake with the adult(s) in the households, noting appropriate information for entry into HMIS and review the status of required re-housing documents. SPDATs will only be conducted after the person or family has all of the appropriate re-housing documents. If there are missing re-housing documents and the person or family does not have the means to pay for some or all of the document(s), the shelter staff can assist the person or family to fill out the re-housing document applications and submit Further, shelter staff will work with any person or family who has a member who has

been identified as having a diagnosed mental illness to secure a completed and executed Housing Impairment Form. The shelter staff will forward the form to the appropriate agency staff who will upload the copy into HMIS.

For those in hotel/motel or who choose to remain unsheltered and do not identify a mental illness at coordinated entry, the CE specialists will initiate contact with Community Health Worker (CHW). The CHW will assist the person or family to complete and submit the request for the re-housing document voucher application to the TLCHB Grants Administrator (GA) and link them to needed services. Further CHW will work with any person or family who has a member who has been identified as having a diagnosed mental illness to secure a completed and executed Housing Impairment Form. The CHW will forward the form to the appropriate agency staff who will upload the copy into HMIS.

For those in hotel/motel or who choose to remain unsheltered and do identify a mental illness at coordinated entry, the CE specialists will initiate contact with PATH. PATH will assist the person or family to complete and submit the request for the re-housing document voucher application to the TLCHB Grants Administrator (GA) and link them to needed services. Further, PATH will work with any person or family who has a member who has been identified as having a diagnosed mental illness to secure a completed and executed Housing Impairment Form. PATH will forward the form to the appropriate agency staff who will upload the copy into HMIS.

Upon approval of the voucher, the TLCHB GA will send the approved re-housing voucher(s) back to the requesting case manager, CHW or PATH staff member. For state IDs, the case manager will provide the voucher to the person or client for presentation at the Bureau of Motor Vehicles (BMV) to secure the state ID; the BMV will bill TLCHB directly for payment. For birth certificates, the case manager will secure a check(s) from his/her employer in an amount to pay for all needed household birth certificates and present them to the appropriate governmental body, either in person, electronically or through the mail. Upon receipt of birth certificates and Housing Impairment forms, the appropriate agency staff will scan and upload the scanned copies into HMIS.

After a person or family who has all of their re-housing documents for all household members and Housing Impairment form(s) if needed, a trained and approved CoC partner staff member will perform the assessment (SPDAT or F-SPDAT) preferably onsite. The shelter staff, the CHW or the PATH worker will schedule the SPDAT or F-SPDAT between the person or head of household and the trained and approved CoC partner staff member. The staff member performing the SPDAT or F-SPDAT will either upload the SPDAT or F-SPDAT in HMIS or have the appropriate agency staff upload the assessment into HMIS. Then either staff member performing the SPDAT or F-SPDAT or the shelter case manager, the CHW or PATH Worker will notify the TLCHB Communications & Data Specialist (CDS) that the SPDAT/F-SPDAT, the re-housing

documents and, if required, the Housing Impairment form has been uploaded into HMIS.

Permanent Housing Placement

Weekly, the TLCHB CDS will update the community SPDAT list. Once updated, the TLCHB Communications & Data Specialist will review the SPDAT scores, the order of priorities and any open permanent housing provider units and then make referrals for the highest ranked person or families into any open units. The TLCHB CDS will match the highest ranked person or family with any permanent housing openings for which they may qualify. If there is no available unit (including meeting the program criteria) for the highest ranked person or family, the TLCHB (CDS will move to next highest ranked individual who does qualify for the open unit. If a person or family is skipped for placement due to either refusal of the placement or unavailability of a unit for which the person or family meets program qualifications, that person or family will be continued on the list.

The permanent housing placements are generally made primarily upon their SPDAT score and availability of permanent housing for which they qualify. For those scoring less than 20 on the SPDAT and those scoring less than 27 on the F-SPDAT, no permanent housing options will be offered; those persons or families will be referred to the appropriate supportive services and are expected to self-resolve their homelessness. Those persons or families scoring between 20 and 27 on the SPDAT or between 27 and 40 on the F-SPDAT are eligible for Rapid Re-Housing financial assistance and services. Those scoring between 28 and 34 on the SPDAT or between 41 and 53 and do not have the ability to increase their earned income will be eligible for short or medium term rapid re-housing financial assistance and services, with a maximum of \$2,400 of rental assistance unless making progress on their housing stability plan. Those scoring between 28 and 34 on the SPDAT or between 41 and 53 and do have the ability to increase their earned income will be eligible for TBRA, renewable quarterly based upon being recertified as program eligible and progressing on their housing stability plan.

If the person or family has a disability as documented on a Housing Impairment form or has SSI or SSDI and scores less than 35 on the SPDAT or less than 54 on the F-SPDAT may be eligible for rapid re-housing, TBRA, or Housing Choice Vouchers (HCV) depending on a meeting of eligibility qualifications. If the person or family with the above SPDAT or F-SPDAT score has ongoing case management and meets LMHA's HCV client eligibility, the person or family is eligible for HCV voucher. If the person or family with the above SPDAT or F-SPDAT score, does not have ongoing case management services and/or does not meet HCV LMHA's HCV client eligibility but has the ability to increase their earned income, the person or family is eligible for TBRA financial services. If the person or family with the above SPDAT or F-SPDAT score, does not have ongoing case management services, does not have the ability to increase earned income, and/or does not meet HCV LMHA's HCV client eligibility, the person or family is

eligible for rapid re-housing financial assistance and services; but if this qualifying person or family with a disability fails in RRH program, they would be eligible for PSH.

If a person or family scores 35 or greater on the SPDAT or 54 or greater on the F-SPDAT, this person or family is eligible for PSH. But they are also eligible for rapid rehousing financial assistance or services and TBRA or HCV if they meet those two programs eligibility if they do not want to wait for PSH opening without penalty. Failing in any of those programs, the person or family will be re-assess and again eligible for PSH financial assistance and services.

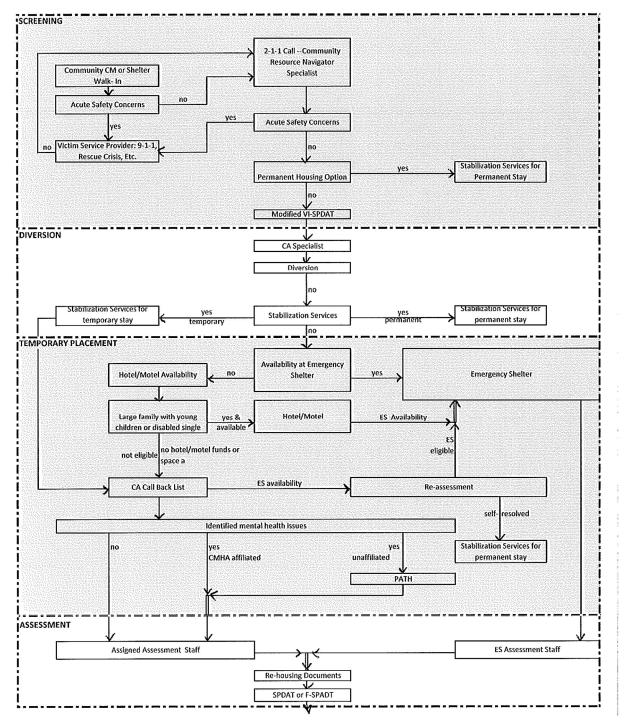
Mutual Responsibility for Appropriate Referrals

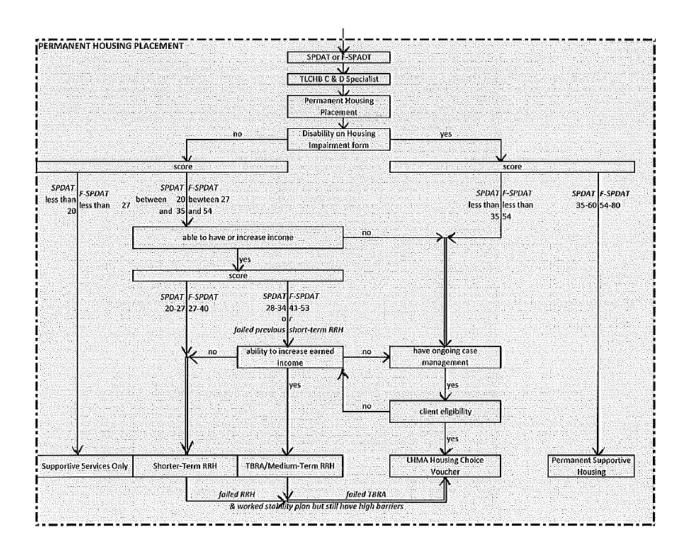
Whether through the Housing Collaborative Network or another body, participating providers must have the opportunity and responsibility to influence the design of Centralized CE Approach and provide feedback on the cases being referred to them. If, for any reason, a provider should determine that a referred case is ineligible or inappropriate for their programs, CE specialists and that provider must work jointly to make a more appropriate referral.

Putting it All Together

The following chart is intended to help visualize the interaction of the pieces in this system and the movement of households through the stages of Screening, Diversion, and Temporary Placement. The shaded areas marked as Screening, Diversion, and Temporary Placement would all take place through United Way 2-1-1. The securing of re-housing documents and, if required, Housing Impairment form is the responsibility of the person or family assisted by the assigned shelter case manager, the CHW or PATH worker who ensures that they are uploaded into HMIS and notify the appropriate CoC partner staff trained in conducting the assessment. Once the assessment is completed and uploaded, the responsible shelter case manager, the CHW or PATH worker notifies the TLCHB Communications and Data Specialist of that upload. The TLCHB Communications and Data Specialist then updates the Community SPDAT lists and makes referrals of the most severest ranked person or family based upon the TLCHB order of priorities and who meets any of the program criteria of an available housing unit to the appropriate Permanent Housing Provider.

REVISED FLOWCHART FOR COORDINATED ASSESSMENT





Toledo Lucas County Continuum of Care: Recommendations for Collaborative Governance of Coordinated Assessment

Original Document Prepared by

Terry Biel—Technology Director, Toledo Lucas County Homelessness Board Mike Badik—Grants Administrator, Toledo Lucas County Homelessness Board

Revisions Prepared by:

Richard Sutherland—HMIS Administrator, Toledo Lucas County Homelessness Board

Background

This document is intended as an addendum to the original Coordinated Assessment recommendations developed through the Housing Collaborative Network and subsequently adopted by the Toledo Lucas County Homelessness Board (TLCHB). The original recommendations left unaddressed the structure by which providers can provide feedback on the quality of referrals from Coordinated Entry, address logistics concerns, and establish standards for participating program types. These are addressed now in this document.

In January 2017, The Department of Housing and Urban Development (HUD) released the Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System (Notice CPD-17-01) and the Coordinated Entry Process Self-Assessment. Together, these two documents present updated requirements and a method of assessment to evaluate the current functioning of Coordinated Assessment (Coordinated Entry) projects. After reviewing the documents, the Quality and Performance Committee tasked themselves with reviewing and revising the local documents and processes.

Terminology: Coordinated Assessment to Coordinated Entry

While Coordinated Assessment is the terminology used in the statutes, HUD and the other Federal Partners have agreed on another phrase to describe the process: Coordinated Entry. While the terms may be used interchangeably, HUD and the Federal partners will use Coordinated Entry to refer to the projects. TLCHB will align with this change.

Management of Coordinated Entry

The Toledo Lucas County Homelessness Board and its staff are ultimately responsible for the implementation and management of Coordinated Entry for housing crises and homeless services in the Toledo Lucas County Continuum of Care.

Data Management for Coordinated Entry

Coordinated Entry includes significant data and therefore, data management. The Toledo Lucas County Continuum of Care has implemented a Homeless Management Information System (HMIS) to help manage data for persons who are homeless within the continuum. As such, data management for all Coordinated Entry functions will be managed within HMIS, to the extent effective within the HMIS software. Important Coordinated Entry data management functions include: Records of Initial Contact and Assessment; Referrals to Emergency Shelter, Transitional Housing or Safe Haven; Records of Stays in Emergency Shelter, Transitional Housing and Safe Haven; Assessments for Housing Placement; and Referrals to Permanent Housing Options (Rapid ReHousing, Permanent Supportive Housing, or other Permanent Housing services).

Privacy Protections for Coordinated Entry

As an extension of the HMIS, data collected for Coordinated Entry functions will be subject to the Privacy and Security provisions of the **Toledo Homeless Management Information System (HMIS) Consolidated Policies and Procedures**, including annual privacy and security training of all HMIS End users. While all homeless service clients must be entered in HMIS, clients that do not consent to share their Personally Identifiable Information (PII) may be entered anonymously.

Evaluation of Coordinated Entry

In order to maintain an effective and functioning system, the community will periodically evaluate the performance of the Coordinated Entry.

Client Surveys

Client Surveys will be used to evaluate the effectiveness of proximate Coordinated Entry experiences. Surveys will be conducted twice a year and at entry or exit of projects adjacent to the Coordinated Entry Functions, such as 1) at Emergency Shelter/Transitional Housing/Safe Haven Start to evaluate initial contact and assessment and referrals or 2) Emergency Shelter/Transitional Housing/Safe Haven Exit to evaluate assessments of permanent housing placement, or 3) at three (3) months after Permanent Housing Placement to evaluate the assessment of permanent housing placement.

Client Focus Groups

Client Focus Groups will be convened to evaluate the effectiveness of the immediate and ongoing Coordinated Entry experiences. Focus groups will be convened twice a year during project client stays and for all effected project types (e.g., Emergency Shelters and Permanent Supportive Housing).

Service Provider Reports

Service Providers and projects can, at any time, report feedback about Coordinated Entry processes to TLCHB using a Coordinated Entry Report Form.

Service Provider Focus Group

Annually, one Housing Collaborative Network (HCN) meeting will be designated for obtaining feedback from participating organizations/projects regarding the effectiveness of Coordinated Entry.

Feedback Evaluation and Reporting

Feedback from all data collection formats will be given to the TLCHB Quality and Performance Committee (or sub-committee thereof) for evaluation. The Committee will report annually on the functioning and effectiveness of the Coordinated Entry project to the community.

Client Privacy for Feedback

At a minimum, clients will have the opportunity to provide feedback anonymously through both surveys and focus groups, although TLCHB reserves the right to mandate anonymity for all collected client feedback. All client feedback passed to the Quality and Performance Committee (or sub-committee thereof) for the purpose of evaluation will be anonymous.

Quality of Care Workgroups

The Quality of Care groups, as created by previous policies, are discontinued.

Coordinated Assessment Advisory Committee

The Coordinated Assessment Advisory Committee, as created by previous policies, is discontinued.

Document History

Document Prepared by

Terry Biel—Technology Director, Toledo Lucas County Homelessness Board Mike Badik—Grants Administrator, Toledo Lucas County Homelessness Board

20 February 2013: Presented to HCN by TLCHB staff

27 March 2013: Adopted by TLCHB

Revisions prepared by Richard Sutherland – HMIS Administrator, Toledo Lucas County Homelessness Board

18 October 2017: Presented to HCN by TLCHB staff 15 November 2017: Amendments approved by TLCHB Recommended by HCN on 18 October 2017/Approved by Toledo Lucas County Homelessness Board on 15 November 2017

Toledo Lucas County Continuum of Care: Coordinated Entry Referral Process

Prepared by:

Carl Sutherland, HMIS Administrator, Toledo Lucas County Homelessness Board

Referral Components

The referral process begins with Coordinated Entry and continues with the TLCHB Homelessness Board (TLCHB) making a referral to a housing program for assistance. There are numerous components to the CoC's housing referral process that occur within TLCHB.

The following is an overview that provides the referral components. Additional details can be found in the subsequent sections of this manual.

- 1. Initial Contact
- 2. Determining Eligibility
- 3. Program Eligibility & Level of Assistance
- 4. Participating Project List
- 5. Referral Approach
- 6. Referral Communications & Tracking
- 7. Rejection Protocol
- 8. Referral Process for DV Victims
- 9. Referral Process for Veterans
- 10. Referral Process for Unaccompanied Youth

Initial Contact

Coordinated Entry: serving as the single, centralized point for access/entry

- 2-1-1 United Way
 - a. Individual calls 2-1-1: they can call 24 hours a day.
 - b. Community Navigation Specialist (CNS) assesses adult only household/households with children, determining their eligibility for shelter.
 - i. If eligible, CNS will conduct the necessary pre-screen, and send information to CE. For this, the Refer database is utilized.

- ii. If ineligible, CNS makes any other appropriate referrals.
- c. CNS verbally confirms family is stable for the night.
 - i. If so, they are told that CE will contact them within 1 business day.
 - ii. If not, a 2-1-1 supervisor is contacted, and subsequently contacts the CE staff on call. If it is an adult only household, outside shelters are given, and CE staff contacts the client back as soon as possible.
- d. When CE is given the information, CNS then transfers their information onto HMIS
- e. A call is then made to the client in order to complete housing crisis assessment and explain shelter process
 - i. If permission was previously given, CE staff will leave a message explaining the process.
 - ii. If CE staff is able to speak with client, assessment is completed, and CE gives any other referrals clients may need.
 - iii. If CE staff is unable to leave message, a follow-up is scheduled, and the client is contacted 3 times.
 - iv. Clients remain on list, until they either have refused shelter, or CE staff has attempted contact twice after housing crisis assessment has been completed.

Determining Eligibility

In TLCHB, one of the tools that the CoC uses to determine level of housing assistance is the SPDAT. The SPDAT/housing assessment is completed with the person in a housing crisis.

• The Service Prioritization Decision Assistance Tool (SPDAT)
Housed within all of participating shelters, as well as most of the
Community Mental Health Centers, are Re-Housing Specialists. These
specialized case managers are trained in the variations between Housing
Programs within the community as well as the SPDAT.

The SPDAT (for individuals) takes into account 15 different domains. The Family SPDAT (F-SPDAT) takes into account 20 domains to determine the family's housing acuity. The SPDAT/F-SPDAT prioritize both housing type as well as housing priority. This tool provides an evidence based assessment of the client's housing preparedness. TLCHB

also considers the amount of time spent in shelter or on the streets within the referral process; this ensures the community minimizes the duration of homeless.

Re-Housing Specialists utilize other case management expertise, case file documentation, and in depth interviewing techniques to complete the SPDAT or the F-SPDAT.

From the various remote access points for SPDAT re-housing assessments, all community SPDAT numbers and information are given to the TLCHB's Communication & Data Specialist to be compiled into a Community SPDAT list. Referrals to appropriate housing programs are coordinated from this list.

Community SPDAT List

The Community SPDAT List is another tool that is used to determine client eligibility. The TLCHB Communication & Data Specialist is responsible for monitoring and maintaining the Community SPDAT Lists. The entries on the Community SPDAT List represent those individual/families who have obtained their required re-housing documents, completed a SPDAT, and are currently homeless. The entries contain the head of household's HMIS number, the SPDAT score, the date the SPDAT was completed, and the number of weeks on the Community SPDAT List.

The Community SPDAT List is distributed to all shelters, Community Mental Health Center, housing programs, CE staff, and outreach workers who have been SPDAT trained. This allows them to track their clients. When a person is referred to a housing program, the TLCHB Communication & Data Specialist documents the referral on spreadsheet and includes which agency and program the person is referred to. The TLCHB Communication & Data Specialist maintains two spreadsheets; 1) the referral spreadsheet which includes agency and recommend programs;

2) spreadsheet of all SPDAT Lists.

Referral Approach

The TLCHB CoC uses a cohesive referral approach. When a referral is made, an email is sent to all parties involved which allows each agency to see what other case managers and supports the referral may have. Case conferences occur frequently to ensure a warm handoff.

Case conferences should include every agency the referral is receiving services from. Examples may include the referring agency, the receiving agency, Children's Services, TLCHB, Community Mental Health Centers, etc. Utilizing case conferences allows all agencies to identify and discuss the referral's barriers and ultimately serve the person more efficiently.

Housing Program Eligibility & Level of Assistance

Within the TLCHB CoC, there is a range of housing programs available to persons experiencing homelessness. The programs range from offering short-term assistance to long-term assistance. The TLCHB CoC honors the referral's choice regarding a specific agency or program type, whenever possible. The TLCHB Communication & Data Specialist is advised when a referral requests alternate placement or program. Each program has eligibility requirements and provides a different level of assistance. Below are the eligibility requirements for each housing program:

- Short-Term Rapid Re-Housing:
 - a. Currently homeless
 - b. Obtained all required re-housing documents
 - c. Completed SPDAT
 - d. SPDAT score between 20-34 for single adults; 35-60 for families
- Medium-Term Rapid Re-Housing:
 - a. Currently homeless
 - b. Families only
 - c. Obtained all required re-housing documents
 - d. Completed SPDAT
 - e. SPDAT score in the higher RRH range
 - f. Cannot re-enter medium-term RRH for 9 months after exiting medium RRH
- Tenant-Based Rental Assistance (TBRA):
 - a. TBRA is still considered a form of RRH
 - b. Currently homeless
 - c. Obtained all required re-housing documents
 - d. Completed SPDAT

- e. SPDAT score on the higher end of the RRH range
- f. Cannot have been in the TBRA program previously
- Permanent Supportive Housing (PSH):
 - a. Currently homeless
 - b. Obtained all required re-housing documents
 - c. Completed SPDAT
 - d. SPDAT score between 35-60 for singles; 54-80 for families
 - e. Have a disability documented on a housing impairment form

Below are the services provided by each type of program:

- Short-Term Rapid Re-Housing (RRH):
 - a. Security deposit
 - b. Outstanding utility debt (up to 6 months)
 - c. \$2,400.00 stipend for rent
 - d. Ongoing case management and wrap around services
- *Medium-Term Rapid Re-Housing (RRH):*
 - a. Security Deposit
 - b. Up to 12 months of rental assistance
 - c. Up to 6 months of past utility debt
 - d. Ongoing case management and wrap around services
- Tenant-Based Rental Assistance (TBRA):
 - a. Security deposit
 - b. Utility deposits (for gas and electric)
 - c. 12 months of rental assistance
 - d. Utility allowance when housed
 - e. Ongoing case management and wrap around services
- Permanent Supportive Housing (PSH):
 - a. Security deposit
 - b. Outstanding utility debt (up to 6 months)
 - c. 12 months or more of rental assistance
 - d. Ongoing case management and wrap around services

Disclosure: The Coordinated Entry Process complies with the non-discrimination requirements of the Fair Housing Act, which prohibits discrimination in all housing transactions on the basis of race, national origin, sex, color, religion, disability status and familial status. This also includes protection from housing discrimination based on source of income. Additional protected classes under state law include sexual orientation (including gender identity), marital status, military

discharge status, age (40+). Agencies cannot preference any protected class unless allowed by statute/regulation, or written waiver from their funding or regulatory body (i.e. U.S. Department of Housing and Urban Development).

All Authorized User Agencies who enter into an MOU for the Coordinated Entry Process agree to take full accountability for complying with Fair Housing and all other funding and program requirements. The MOU requires User Agencies to use the Coordinated Entry Process in a consistent manner with the statutes and regulations that govern their housing programs.

The TLCHB CoC will request from each Authorized User Agency their tenant selection plan and any funding contract that requires or allows a specific subpopulation of persons to be served. For instance, Housing Opportunities for Persons with AIDS (HOPWA) programs will show funding contract, or a single-gender program must produce its HUD waiver. The TLCHB CoC in accordance with the Fair Housing Act also recognizes that a housing provider may seek to fulfill its "business necessity" by narrowing focus on a subpopulation within the homeless population. The Coordinated Entry Process may allow filtered searches for subpopulations while preventing discrimination against protected classes.

Participating Project List

It is critical to determine housing program availability before making a referral. TLCHB's Communication & Data Specialist is responsible for monitoring housing program availability.

The TLCHB Communication & Data Specialist communicates weekly with the multiple housing programs to inquire about availability.

After the housing programs have communicated the availability for the week, the TLCHB Communications & Data Specialist enters that information into a spreadsheet. This spreadsheet includes the number of openings each week, the program type (RRH, TBRA or PSH) and the individual projects and any additional eligibility requirements.

A separate spreadsheet is created that has all of the Community SPDAT Lists that have been distributed complete with referral information.

Referral Communication & Monitoring

Referral Communication

After eligibility has been determined the TLCHB Communication & Data Specialist verifies that the person has all necessary documents and the SPDAT score. Then, when an opening has been identified, the TLCHB Communication & Data Specialist informs all parties involved of the referral. This is done via email as all parties can keep electronic records.

The referral email contains the following information:

- The referral date and time
- The person (identified by an HMIS number for confidentiality)
- The program type the person is being referred for
- Any relevant information or disabilities (family size, wheel chair access, etc.)
- A timeframe for the referral agency to contact the person
- How to locate the person's required documents and SPDAT

The referral email is sent from the TLCHB Communication & Data Specialist to the following parties:

- The agency currently serving the person (shelter and/or mental health provider)
- The agency receiving the referral
- The Coordinated Entry Specialist

When the referral agency receives the referral, they are given access to the client's documents and SPDAT score to verify eligibility.

Referral Monitoring

The TLCHB CoC has the ability to monitor referral progress. The TLCHB Communication & Data Specialist using electronic documentation and the HMIS data system monitors the referrals.

When a referral is made, the TLCHB Communication & Data Specialist sends an email notifying all parties of the referral. In that email there is a timeframe by which the receiving agency must contact the client, generally it is a 7-10 day timeframe. After the receiving agency completes an intake with the person, an entry is made in the HMIS data system. Additionally, there is an option in HMIS for the referral agency and the receiving agency to leave case notes documenting progress.

After 10 days the TLCHB Communication & Data Specialist will verify that the person's documents were shared correctly and check for an entry in HMIS. If the documents have been shared and there has been, confirmation that the person has not been contacted the TLCHB Communication & Data Specialist will contact the receiving agency to inquire about the status of the referral. If the receiving agency is unable to take the referral, an alternative referral is identified. If the receiving agency is unable to locate a person after 7-10 days the case will closed. The person will have the opportunity for another referral if they present as homeless again in the future.

Referral Rejection Protocol

Receiving Agency

In the TLCHB CoC, receiving agencies are permitted to reject a referral if the referral violates the agency's program policies. If a referral is rejected the person, the agency serving the person and the TLCHB Communication & Data Specialist is notified in writing of the rejection and the rationale. A rejection letter also contains that agency's grievance procedure. The person has the right to file a grievance and go through the grievance procedure within that agency. If the person wishes to escalate the grievance it is brought to either TLCHB's Executive Director or Grants Administrator.

If a solution cannot be reached and the person is still in need of housing assistance, the TLCHB Communication & Data Specialist makes every effort to identify an alternate referral agency.

Client

As mentioned previously, the TLCHB CoC does adhere to a person's choice when it comes to referrals. At the beginning of the process, the person is made aware of what program types are available for them and the eligibility requirements associated with each one. If the person has a preference for program type or agency and the person is eligible for that program or agency, the TLCHB CoC does honor that. If the person has a preference, they are informed that by limiting their referral options they may be prolonging the referral process, however if the person still has a certain preference, the TLCHB CoC honors it.

Referral Process for DV Victims

The TLCHB CoC has a process for serving a person that is fleeing from domestic violence. There are two options, one is used if the client is willing to have their

information entered into the secure HMIS data system, and the other is used if the client refuses to have their information entered into the secure HMIS data system.

Allow Information in HMIS

If a person consent to be entered into the HMIS system, they are given a consent form that they must sign. Then, the process proceeds as it usually does; a SPDAT is completed, the person is placed on the Community SPDAT List, a referral is made and agencies work together to assist the person obtaining housing.

Refuse Information in HMIS

No person is required to be entered into HMIS. If a person does consent to being entered into the HMIS system, they can be entered anonymously without providing any identifying information. In this case, either the DV shelter or the TLCHB Communication & Data Specialist will give the person an ID number, not an HMIS number. The person will have the SPDAT completed and be placed on the Community SPDAT List, using the client ID number.

When a referral is made, the TLCHB Communication & Data Specialist or the agency serving the person will fax the person's documents and SPDAT to the agency receiving the referral. This will only be communicated via fax for security. The person will be identified by the client ID number in any electronic correspondence.

If a case manager enters, a person anonymously in HMIS that case manager is responsible for tracking that person in the system.

If a person has had their information entered into HMIS and then chooses to be anonymous in that system, the HMIS Administrator is contacted to allow that person to be anonymous.

Housing Referrals for DV Victims

The agency receiving the referral is informed if the person is a DV victim or residing in a DV shelter. This allows the receiving agency to prepare a housing plan specific to that person.

Referral Process for Veterans

In order to identify all veterans in the Toledo Lucas County Continuum of Care, the Community Veterans Committee Master List Sub-group will use various sources of relevant data to compile and maintain a Master (by name) list. The following sources of relevant veterans' data have been identified. Sources shall be polled no less than every two weeks:

- 1. Toledo HMIS (Toledo Lucas County Homelessness Board), including data from Open Door Ministries, NPI Veterans Program (GPD), Beach House, St Pauls' Community Center Shelter & Family House Shelter
- 2. WSOS Community Action, including data from Outreach Sources i.e., Cherry Street Mission Ministries and Toledo Gospel, & National Church Residences (via ineligible referrals)
- 3. Veterans Affairs of Ann Arbor, including data from VA referrals to ADAMS House, VASH referrals and all outreach activities.
- 4. Verification of Permanent Housing Offer forms should be polled.

The Toledo Lucas County Homelessness Board's HMIS administrator will be responsible to maintain the Veterans' Master List. The HMIS Administrator will poll the sources of veteran data no less than every two week and update the Master List accordingly. Once updated the Master List will be securely distributed to members of the Master List Subgroup for the bi-weekly case conferencing meeting.

Not less than every two weeks, all veterans on the Master List will be discussed in the Master List Sub-group with the goal to identify barriers to permanent housing and facilitate solutions to those barriers. The HMIS administrator will lead the Sub-group through the Master list. All parties with relevant data will share updates to the veteran's status. The sub-group will identify next steps to the goal of the veteran's obtaining permanent housing and assign the next steps to a Sub-group member. The HMIS administrator will note all updates, next steps and responsible parties in the Master list.

The Master List Sub-group will report out aggregate statistics and benchmarks regularly. The HMIS Administrator will process the statistics and benchmarks no less than once monthly and report them to the Community Veterans Committee Planning Group. And the Master List Policies and Procedures will be reviewed no less than annually based on case conferencing performance.

Referral Process for Unaccompanied Youth

Currently, there are two processes for serving unaccompanied youth, the determinant being the age of the youth. For those youth between the ages of 18 to 24 years old, these youth are entered into the coordinated entry referral process described on pages 1 to 9. For unaccompanied youth under 18 years old, the youth are referred to Safety Net, a youth shelter for youth from 12 to 17 years old.

Safety Net provides temporary shelter, supportive services and life skills development lessons to youth who have left home without permission of their parents or guardians or to other homeless youth who might otherwise end up in the child welfare, mental health, or juvenile justice systems in Lucas County (Toledo), Ohio. Safety Net is designed to increase youth's safety, social and emotional wellbeing, self-sufficiency, and to help them build permanent connections with families, communities, schools and other positive social networks.

Youth ages 12-17 may stay (become a resident at Safety Net) if they meet one or more of the following criteria:

- 1. Youth are experiencing a family crisis to the point where safety, physical health or emotional health is at risk;
- 2. Youth who have run away;
- 3. Youth who have been asked to leave their residence;
- 4. Youth who are homeless or couch hopping from place to place;
- 5. Youth who are stranded in the area;
- 6. Youth who are being physically, sexual, or emotionally abuse and need to get help; or
- 7. Other situations that are a crisis for the resident (i.e. resident is lost, resident's guardians cannot be located, etc.).

Custodial consent is required for minor residents who remain in the Shelter for more than twenty-four hours. Staff will attempt to obtain constant at admission or as soon as possible unless there are reasons to delay contact with guardian.

Referrals may come from a variety of sources. Youth may just appear at Safety Net and will be assessed.

While at Safety Net, the youth will be provided with:

• **Gateway services**, providing food, shelter, clothing, transportation and hygiene-related items;

- Assessment services and intensive coordinated case management, ensuring youth receive assistance with emotional and behavioral health challenges while developing a plan for permanency;
- **Continuum service linkages**, ensuring the ability to provide services as a community to the target population; and
- **Follow-up/aftercare services**, providing three months of follow-up services to youth, including a plan to exit, permanent placement and personal goals.

Youth will be screened within their first two days in the shelter by staff; the results of these screens will be used to inform the service planning process, including the need for further assessment. Clinical assessment for behavioral health will be provided by staff within Zepf Center's youth services department.

Shelter staff will collaborate with the youth to develop an exit plan. Part of the exit planning process will be to ask the youth to discuss their plans for either reunification with the parents/ guardian or to consider options for a safe and stable living situation if reunification is not possible. 90 days of follow up/aftercare services will be provided for youth who receive shelter services or are provided alternative living arrangements, regardless of their length of stay in the shelter.



SF-424, Certifications And Ordinances

OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424				
* 1. Type of Submission: Preapplication Application Changed/Corrected		New		f Revision, select appropriate letter(s): Other (Specify):
* 3. Date Received:		4. Applicant Identifier: 34-6401447		
5a. Federal Entity Identifier: 5b. Federal Award Identifier: B-23-MC-39-0021				
State Use Only:				
6. Date Received by State	te:	7. State Application	ı Id	lentifier:
8. APPLICANT INFORM	/IATION:			
* a. Legal Name: City	of Toledo,	Dept. of Housing and	d (Community Development
* b. Employer/Taxpayer lo	dentification Num	nber (EIN/TIN):		*c. UEI: N669DP1XJCH6
d. Address:				
Street2;	e Government	t Center, Suite 1800		
County/Parish: Lucas				
* State: OH: Ohio				
Province:				
* Country: USA: UNITED STATES * Zip / Postal Code: 43604-2209				
* Zip / Postal Code: 43604-2209 e. Organizational Unit:				
Department Name: Division Name:				
Hsg. & Community	Development			
f. Name and contact information of person to be contacted on matters involving this application:				
Prefix: Ms. Middle Name: * Last Name: Clemen	ns	* First Name	ie:	Rosalyn
Suffix:				
Title: Dir., Dept. of Hsg. & Community Development				
Organizational Affiliation:				
* Telephone Number: (419) 245-1400 Fax Number: (419) 245-1192				
*Email: rosalyn.cle	emens@toledo	o.oh.gov		

Application for Federal Assistance SF-424				
* 9. Type of Applicant 1: Select Applicant Type:				
C: City or Township Government				
Type of Applicant 2: Select Applicant Type:				
Type of Applicant 3: Select Applicant Type:				
* Other (specify):				
* 10. Name of Federal Agency:				
U.S. Department of Housing and Urban Development				
11. Catalog of Federal Domestic Assistance Number:				
14.218				
CFDA Title:				
49th Year Community Development Block Grant Program				
* 12. Funding Opportunity Number: B-23-MC-39-0021				
* Title:				
FY23: CDBG-CFDA #14.218				
13. Competition Identification Number:				
Title:				
14. Areas Affected by Project (Cities, Counties, States, etc.):				
City of Toledo.docx Add Attachment Delete Attachment View Attachment				
* 15. Descriptive Title of Applicant's Project:				
Programmatic and operational plan for improving the physical, economic & social conditions, & quality of life for citizens through community development, economic development, & housing				
activities.				
Attach supporting documents as specified in agency instructions.				
Add Attachments Delete Attachments View Attachments				

Application for Federal Assistance SF-424				
16. Congressional Districts Of:				
* a. Applicant Ninth	* b. Program/Project Ninth			
Attach an additional list of Program/Project Congressional Distric	ts if needed.			
	Add Attachment Delete Attachment View Attachment			
17. Proposed Project:				
* a. Start Date: 07/01/2023	* b. End Date: 06/30/2024			
18. Estimated Funding (\$):				
* a. Federal 7,355,028.00				
* b. Applicant				
* c. State				
* d. Local				
* e. Other				
* f. Program Income 223,679.00				
* g. TOTAL 7,578,707.00				
* 19. Is Application Subject to Review By State Under Exec	cutive Order 12372 Process?			
a. This application was made available to the State undo	er the Executive Order 12372 Process for review on .			
b. Program is subject to E.O. 12372 but has not been se	elected by the State for review.			
C. Program is not covered by E.O. 12372.				
* 20. Is the Applicant Delinquent On Any Federal Debt? (If	"Yes," provide explanation in attachment.)			
☐ Yes ☐ No				
If "Yes", provide explanation and attach				
	Add Attachment Delete Attachment View Attachment			
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)				
★* I AGREE				
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency				
specific instructions.				
Authorized Representative:				
Prefix: Mr. *Firs	st Name: Wade			
Middle Name:				
* Last Name: Kapszukiewicz				
Suffix:				
*Title: Mayor, City of Toledo				
* Telephone Number: (419) 245-1001	Fax Number: (419) 245-1370			
* Email: mayor@toledo.oh.gov				
* Signature of Authorized Representative:	* Date Signed:			
x Wase 1	Lapszuhiew 5-22-23			

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009 Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General
 of the United States and, if appropriate, the State,
 the right to examine all records, books, papers, or
 documents related to the assistance; and will establish
 a proper accounting system in accordance with
 generally accepted accounting standards or agency
 directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- 4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- 6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race. color or national origin: (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (i) the requirements of any other nondiscrimination statue(s) which may apply to the application.

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- 13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

- Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- 17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- 18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
1.1 1.1/ 0	Mayor, City of Toledo
Wade Kapszuliew	
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Toledo, Dept. of Housing & Community Development	x 5-22-23

OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424				
* 1. Type of Submissi Preapplication Application Changed/Corre	ion: ected Application	New		f Revision, select appropriate letter(s): Other (Specify):
* 3. Date Received:		4. Applicant Identifier: 34-6401447		
5a. Federal Entity Identifier: 5b. Federal Award Identifier: 34-6401447 E-23-MC-39-0021				
State Use Only:				
6. Date Received by	State:	7. State Application	ld	entifier:
8. APPLICANT INFO	ORMATION:			
* a. Legal Name:	ity of Toledo,	Dept. of Housing and	d (Community Development
* b. Employer/Taxpay	yer Identification Nur	mber (EIN/TIN):	T	* c. UEI:
34-6401447				N669DP1XJCH6
d. Address:				
Street1: One Government Center, Suite 1800 Street2:				
* City: County/Parish:	Toledo		_	
* State:				
* State: OH: Ohio Province:				
* Country:	USA: UNITED S	TATES		
* Zip / Postal Code:	43604-2209			
e. Organizational U	Init:			
Department Name: Division Name:				
Hsg. & Communi	ty Development	;		
f. Name and contact information of person to be contacted on matters involving this application:				
Prefix: Ms.		* First Name	e:	Rosalyn
Middle Name:				
* Last Name: Cle	mens			
Suffix:				
Title: Dir., Dept. of Hsg. & Community Development				
Organizational Affiliation:				
* Telephone Number: (419) 245-1400 Fax Number: (419) 245-1192				
*Email: rosalyn.clemens@toledo.oh.gov				

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
C: City or Township Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
U.S. Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number:
14.231
CFDA Title:
37th Year Emergency Solutions Grant Program (ESG)
* 12. Funding Opportunity Number:
E-23-MC-39-0021
* Title:
Funding Availability for the Emergency Solutions Grants (ESG) Program
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
City of Toledo.docx Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
Provision of homelessness prevention, rapid re-housing, and housing stabilization activities to eliminate homelessness.
eliminate nomelessness.
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

ı

Application for Federal Assistance SF-424					
16. Congressional Districts Of:					
* a. Applicant Ninth	* b. Program/Project Ninth				
Attach an additional list of Program/Project Congressional Distr	icts if needed.				
	Add Attachment Delete Attachment View Attachment				
17. Proposed Project:	•				
* a. Start Date: 07/01/2023	* b. End Date: 06/30/2024				
18. Estimated Funding (\$):					
* a. Federal 648,066.0					
* b. Applicant					
* c. State	1				
* d. Local					
* e. Other	1				
* f. Program Income					
*g. TOTAL 648,066.0					
* 19. Is Application Subject to Review By State Under Ex					
a. This application was made available to the State un					
b. Program is subject to E.O. 12372 but has not been					
c. Program is not covered by E.O. 12372.					
	III "Yee " provide evaluation in attackment \				
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) Yes No					
If "Yes", provide explanation and attach					
	Add Attachment Delete Attachment View Attachment				
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)					
★* I AGREE					
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.					
Authorized Representative:					
Prefix: Mr. *F	irst Name: Wade				
Middle Name:					
* Last Name: Kapszukiewicz					
Suffix:					
* Title: Mayor, City of Toledo					
* Telephone Number: (419) 245–1001 Fax Number: (419) 245–1370					
* Email: mayor@toledo.oh.gov					
* Signature of Authorized Representative: * Date Signed; 5-22-23					

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009 Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General
 of the United States and, if appropriate, the State,
 the right to examine all records, books, papers, or
 documents related to the assistance; and will establish
 a proper accounting system in accordance with
 generally accepted accounting standards or agency
 directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- 4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- 8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
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- 13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- 17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- 18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
Wade Kapsylieur	Mayor, City of Toledo
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Toledo, Dept. of Housing & Community Development	× 5-22-23

SF-424D (Rev. 7-97) Back

OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424				
* 1. Type of Submission: Preapplication Application Changed/Corrected App	* 2. Type of Application: New Continuation Revision * If Revision, select appropriate letter(s): * Other (Specify): Revision			
* 3. Date Received:	4. Applicant Identifier: 34-6401447			
5a. Federal Entity Identifier: 5b. Federal Award Identifier: 34-6401447 M-23-MC-39-0212				
State Use Only:	<u> </u>			
6. Date Received by State:	7. State Application Identifier:			
8. APPLICANT INFORMATION	DN:			
* a. Legal Name: City of	Toledo, Dept. of Housing and Community Development			
* b. Employer/Taxpayer Identif				
34-6401447	N669DP1XJCH6			
d. Address:				
* Street1: One Go	overnment Center, Suite 1800			
Street2:				
* City: Toledo				
County/Parish: Lucas				
* State: OH: Ohio				
Province:				
* Country: USA: UNITED STATES				
* Zip / Postal Code: 43604-2209				
e. Organizational Unit:				
Department Name: Division Name:				
Hsg. & Community Development				
f. Name and contact information of person to be contacted on matters involving this application:				
Prefix: Ms.	* First Name: Rosalyn			
Middle Name:				
* Last Name: Clemens				
Suffix:				
Title: Dir., Dept. of Hsg. & Community Development				
Organizational Affiliation:				
*.Telephone Number: (419) 245–1400 Fax Number: (419) 245–1192				
* Email: rosalyn.clemens@toledo.oh.gov				

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
C: City or Township Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
U.S. Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number:
14.239
CFDA Title:
32nd Year HOME Investment Partnerships Program
* 12. Funding Opportunity Number:
M-23-MC-39-0212
*Title: FY23: HOME-CFDA #14.239
FIZJ. NOME-CFDA #14.235
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
City of Toledo.docx Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
Housing Rehabilitation Program: Owner-occupied rehabilitation, Down Payment Assistance, housing
development, CHDO set-aside, and tenant-based rental assistance.
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

,

Application for Federal Assistance SF-424				
16. Congressional Districts Of:				
*a. Applicant Ninth *b. Program/Project Ninth				
Attach an additional list of Program/Project Congressional Districts if needed.				
Add Attachment Delete Attachment View Attachment				
17. Proposed Project:				
* a. Start Date: 07/01/2023 * b. End Date: 06/30/2024				
18. Estimated Funding (\$):				
* a. Federal 2,551,780.00				
* b. Applicant				
* c. State				
* d. Local				
* e. Other				
*f. Program Income				
*g. TOTAL 2,551,780.00				
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?				
a. This application was made available to the State under the Executive Order 12372 Process for review on				
b. Program is subject to E.O. 12372 but has not been selected by the State for review. C. Program is not covered by E.O. 12372.				
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)				
☐ Yes ☐ No				
If "Yes", provide explanation and attach Add Attachment Delete Attachment View Attachment				
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)				
★* I AGREE				
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.				
Authorized Representative:				
Prefix: Mr. * First Name: Wade				
Middle Name:				
* Last Name: Kapszukiewicz				
Suffix:				
* Title: Mayor, City of Toledo				
* Telephone Number: (419) 245-1001 Fax Number: (419) 245-1370				
*Email: mayor@toledo.oh.gov				
* Signature of Authorized Representative: * Date Signed: * Date Signed: * Date Signed: * 5-22-23				

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009 Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General
 of the United States and, if appropriate, the State,
 the right to examine all records, books, papers, or
 documents related to the assistance; and will establish
 a proper accounting system in accordance with
 generally accepted accounting standards or agency
 directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- 4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- 8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- 13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

- Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- 16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- 17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- 18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
1. 1.11 0	Mayor, City of Toledo
Wade Kagrulian	
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Toledo, Dept. of Housing & Community Development	x .5-22-23

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CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- 3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

Signature of Authovized Official

x 5-22-33 Date

Mayor, City of Toledo

Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

- 1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).
- 2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) July 1, 2023 June 30, 2024 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.
- 3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

- 1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
- 2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Signature of Authorized Official

x <u>5-22-23</u> Date

Mayor, City of Toledo

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

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× 5-22-23
Date

Mayor, City of Toledo

Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation — If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs — In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation — Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services — The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality — The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy — The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature of Authorized Official

x5-22-23 Date

Mayor, City of Toledo

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

49th (2023) Year CDBG Department of Housing and Community Development Bonita Bonds (x1401) Revised

ORD. 263-23

Authorizing the Mayor to accept, deposit, appropriate and expend the Community Development Block Grant from the U.S. Department of Housing and Urban Development (HUD) in the amount of \$7,355,028; authorizing the expenditure of CDBG carryover funds from all years prior to program year 2022 (48th) in the amount of \$382,789.80; and authorizing submission to the U.S. Department of Housing and Urban Development of the 2023-2024 Annual Action Plan; and declaring an emergency.

SUMMARY & BACKGROUND:

This legislation provides funding for a variety of programs both for the administration of the CDBG program and programs operated internally by various City Departments and operations, Community Development Corporations, and Social Service agencies. This legislation authorizes the acceptance, deposit, appropriation and expenditure in the amount of \$7,355,028 as well as the expenditure of CDBG carryover funds in the amount of \$382,789.80 from all years prior to program year 2022 (48th) in federal funds and more specifically, the 2023-2024 Annual Action Plan for the 2023 Program Year to be submitted to HUD on May 17th, 2023.

The financial impact of this Ordinance is the receipt of \$7,355,028 from HUD to the City of Toledo for the administration of the CDBG Program as well as the allocation of funding to Community Development Corporations and various Social Service agencies in the Toledo community. Also, the expenditure of CDBG carryover funds in the amount of \$382,789.80 from all years prior to program year 2022 (48th). NOW, THEREFORE,

Be it ordained by the Council of the City of Toledo:

SECTION 1. That the Mayor is authorized to submit the 2023-2024 Annual Action Plan; accept the 2023 Program Year CDBG allocation from HUD in the amount of \$7,355,028; deposit the amount received from HUD into Account Code 2015-16100-5G49000STDADM (Community Development Block Grant Fund) for the purpose of funding the CDBG Program.

SECTION 2. That the appropriation in the amount of \$7,355,028 is authorized from the unappropriated grant proceeds in the Community Development Block Grant Fund into various accounts; and further authorizing the expenditure of same pursuant to the attached Schedule A; also authorizing the expenditure of a portion of the CDBG carryover balance in the Community Development Block Grant Fund from all years prior to program year 2022 (48th) in the amount of \$382,789.80 pursuant to Schedule B.

SECTION 3. That the Mayor and the Director of Housing and Community Development are authorized to enter into any necessary agreements for the purposes listed herein subject to the terms and conditions deemed proper and requisite according to the Director of Law, not to exceed the amount of \$7,355,028 49th (2023) Year CDBG and not to exceed \$382,789.80 from the CDBG carryover balance from all years prior to program year 2022 (48th).

SECTION 4. That the Finance Director is authorized to issue his warrant or warrants in an amount not to exceed the amount estimated to be of \$7,355,028 from the Community Development Block Grant Fund in payment of all obligations authorized under the 49th (2023) Year CDBG allocation and not to exceed \$382,789.80 from the CDBG carryover balance from

all years prior to program year 2022 (48th) upon presentation of properly approved documentation.

SECTION 5. That this Ordinance is declared to be an emergency measure and shall take effect and be in force from and after its passage. The reason for the emergency lies in the fact that same is necessary for the immediate preservation of the public peace, health, safety and property, and for the further reason that same must be immediately effective in order to permit the City to submit the 2023-2024 Annual Action Plan, qualify under the regulations of the Community Development Block Grant Entitlement Program, and to receive the money necessary to carry out its planned community development activities for the 49th (2023) year beginning July 1, 2023 and ending June 30, 2024.

Vote on emergency clause: yeas 12, nays 0.

Passed: May 16, 2023, as an emergency measure: yeas 12, nays 0.

Attest:

Gerald E. Dendinger

Matt Cherry

Clerk of Council

President of Council

Approved:

May 16, 2023

Wade Kapszukiewicz

Mayor

Schedule A

CITY OF TOLEDO

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT CDBG ALLOCATIONS FOR 49th PY and OTHER DEPARTMENTAL ALLOCATIONS

(July 1, 2023 - June 30, 2024)

PUBLIC SERVICE ACTIVITIES

THIRD PARTY PARTNERS	CDBG
Arts Commission	\$ 20,000.00
Believe Center	\$ 50,000.00
Children's Theatre Workshop	\$ 10,000.00
Compassion Health Toledo	\$ 70,000.00
Grace Community Center	\$ 46,609.00
Legal Aid of Western Ohio	\$ 100,000.00
Martin Luther King Kitchen for the Poor	\$ 54,000.00
Neighborhood Health Association	\$ 154,647.00
Sofia Quintero Art & Cultural Center	\$ 90,000.00
Toledo GROWS	\$ 48,000.00
Toledo Seagate Food Bank	\$ 60,000.00
Public Service Capacity Dollars	\$ 179,998.20
SUBTOTAL	\$ 883,254.20

CAPACITY, HOUSING, and OTHER ACTIVITIES

East Toledo Family Center	\$ 75,000.00
Historic South Initiative	\$ 50,000.00
Lucas Metropolitan Housing/Lucas Housing Services	\$ 95,000.00
Maumee Valley Habitat for Humanity	\$ 400,000.00
NeighborWorks Toledo Region	\$ 400,000.00
Pathway, Inc. (formerly EOPA)	\$ 425,000.00
Toledo Fair Housing Center	\$ 150,000.00
SUBTOTAL	\$ 1,595,000.00

COT DEPARTMENTAL ALLOCATIONS

COT: Department of Housing and Community Development:	
COT Rooftop Program	\$ 475,000.00
Division of Administrative Services	\$ 1,321,005.60
Division of Housing	\$ 1,150,558.00
Capacity Buidling Institute	\$ 150,000.00
Wayman Palmer YMCA	\$ 1,717,210.20
Toledo/Lucas County Regional Health District	\$ 63,000.00
SUBTOTAL	\$ 4,876,773.80
GRAND TOTAL	\$ 7,355,028.00

Schedule B

Community Development Block Grant

Expenditure of Carryover Funds

Following are programs that will be funded with a portion of the CDBG carryover balance from years prior to the 2022 (48th) CDBG Program Year:

<u>Program</u>	<u>Amount</u>
Jumpstart	\$ 100,000.00
Wayman Palmer YMCA	\$ 282,789.80
Grand Total	\$ 382,789.80

37th (2023) Program Year ESG Department of Housing and Community Development Bonita Bonds (x1401) Revised

ORD. 264-23

Authorizing the Mayor to accept, deposit, appropriate, and expend the Emergency Solutions Grant in the amount of \$648,066 from the U.S. Department of Housing and Urban Development to fund Emergency Solutions Grant Program activities; authorizing submission to the U.S. Department of Housing and Urban Development the One-Year Action Plan; and declaring an emergency.

SUMMARY & BACKGROUND:

The City of Toledo (COT) receives from the U.S. Department of Housing and Urban Development (HUD) a designated Emergency Solutions Grant (ESG) amount, as an entitlement city and participating jurisdiction, for the purpose of ending homelessness in Toledo. The city's receipt and acceptance of the grant amount compels it to utilize the funds within certain HUD regulations, directives, and guidelines, as well as, pursuant to the HUD approved Five Year Consolidated Plan for the City of Toledo. Specifically, the Consolidated Plan which the COT must follow is in effect from 2020 through 2024. Each year, however, the COT submits to HUD its One Year Action Plan, describing how it will continue to implement and execute the Five-Year Consolidated Plan. The City must submit the One Year Action Plan each year within the respective five-year period in order to continue to receive the annual ESG allocation from HUD. In the Five-Year Consolidated Plan, as well as, the 2023-2024 Action Plan, one of nine priorities is "ending homelessness". Likewise, the Consolidated Plan and each year's Action Plan, inclusive of the 2023-2024 Action Plan, specifies that the COT will partner and collaborate with the HUD designated Continuum of Care (CoC) entity for Toledo (and Lucas County), i.e., the Toledo Lucas County Homelessness Board (TLCHB), in addressing the goal of ending homelessness in the community. It is the TLCHB as the HUD designated CoC entity that coordinates the response (e.g., rapid re-housing), the resources (e.g., leveraging of several funding sources), and the responsibility (e.g., community focus/representation) for ending homelessness in the Toledo community.

This Ordinance is to authorize the Mayor to submit to HUD the 2023-2024 One Year Action Plan, accept the 2023 Program Year ESG allocation from HUD, deposit the 37th (2023) Program Year ESG funds received from HUD into the appropriate Account Code, and expend the amount received pursuant to the Five-Year Consolidated Plan, and more specifically, the One Year Action Plan for the 2023 Program Year to be submitted to HUD on May 17th, 2023.

The financial impact of this Ordinance is the receipt of the \$648,066 from HUD to the City of Toledo for ending homelessness in the Toledo community. NOW, THEREFORE,

Be it ordained by the Council of the City of Toledo:

SECTION 1. That the Mayor is authorized to submit the 2023-2024 One Year Action Plan to HUD, as well as, accept the 37th (2023) Program Year ESG allocation from HUD in the amount of \$648,066 and deposit the amount received from HUD into Account Code 2016-16100-5GE3702STDSTD (Operations Grants Fund) and expend the amount received pursuant to Schedule A attached.

SECTION 2. Authorizing the appropriation from the unappropriated grant proceeds in the Operations Grants Fund in the amount of \$648,066 into Account Code 2016-16100.

SECTION 3. Authorizing the Mayor and the Director of Housing and Community Development to enter into any necessary agreements for the purposes listed herein subject to the terms and conditions deemed proper and requisite according to the Director of Law, not to exceed the amount of \$648,066 for the 37th (2023) Year ESG provided by HUD for ESG activities.

SECTION 4. That the Finance Director be and is hereby authorized to issue warrant or warrants in an amount not to exceed \$648,066 from the Account Code authorized above in Section 2 in payment of all obligations authorized under the 37th (2023) ESG program year allocation upon presentation of properly approved documentation.

SECTION 5. That this Ordinance is declared to be an emergency measure and shall take effect and be in force from and after its passage. The reason for the emergency is the fact that this Ordinance is necessary for the immediate preservation of the public peace, health, safety and property, and for the further reason that this Ordinance must be immediately effective in order to allow the City of Toledo to implement the 2023-2024 One Year Action Plan submitted to HUD on May 17th, 2023 as it relates to the ESG funds to be received from HUD and pursuant to HUD regulations.

Vote on emergency clause: yeas 11, nays 0.

Passed: May 16, 2023, as an emergency measure: yeas 11, nays 0.

Attest:

Gerald E. Dendinger

Matt Cherry

Clerk of Council

President of Council

Approved:

May 16, 2023

Wade Kapszukiewicz

Mayor

CITY OF TOLEDO DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT ESG ALLOCATIONS FOR 37th PY

(July 1, 2023 - June 30, 2024)

PUBLIC SERVICE ACTIVITIES FOR HOMELESS SERVICE PROVIDERS

ESSENTIAL SERVICES	ESG	
Beach House	\$	76,755.00
Family House	\$	120,000.00
St. Paul's Community Center	\$	125,000.00
Sub-total	\$	321,755.00

STABILIZATION SERVICES	ESG	
Aurora Project, Inc.	\$	80,000.00
Beach House	\$	87,206.05
United Way - Diversion/Central Intake	\$	110,500.00
TLCHB - ADMINISTRATIVE OPERATIONS	\$	48,604.95
Sub-Total	\$	326,311.00
GRAND TOTAL - ESG	\$	648,066.00

32nd (2023) Program Year HOME Department of Housing and Community Development Rosalyn Clemens (x3647) Revised

ORD. 265-23

Authorizing the Mayor to accept, deposit, appropriate and expend the HOME Investment Partnership Program Grant in the amount of \$2,551,780 from the U.S. Department of Housing and Urban Development (HUD) for the purpose of funding the 2023 HOME Investment Partnership Program; authorizing the expenditure of HOME Carryover funds from all years prior to program year 2023 (32nd) in the amount of \$1,261,292.36; and authorizing submission to the U.S. Department of Housing and Urban Development the 2023-2024 Annual Action Plan; and declaring an emergency.

SUMMARY & BACKGROUND:

The City of Toledo (COT) receives from the U.S. Department of Housing & Urban Development (HUD) a designated amount of HOME Investment Partnership Program (HOME) Grant dollars, as an entitlement city and participating jurisdiction, for the purpose of meeting HUD national objectives, as well as, providing affordable housing to low- and moderate-income individuals or families. The city's receipt and acceptance of the grant amount compels it to utilize the funds within certain HUD regulations, directives, and guidelines, as well as, pursuant to the HUD approved Five Year Consolidated Plan and the Annual Action Plan for the City of Toledo. Specifically, the Consolidated Plan which the COT must follow is in effect from 2020 through 2024. Each year, however, the COT submits to HUD its Annual Action Plan, describing how it will continue to implement and execute the current Five Year Consolidated Plan but within the subject Program Year. The City must submit the One Year Action Plan each year within the respective five-year period in order to continue to receive the annual HOME allocation from HUD.

This Ordinance is to authorize the Mayor to submit to HUD the 2023-2024 Annual Action Plan, accept the 2023 Program Year HOME allocation from HUD, deposit the HOME funds received from HUD into the appropriate Account Codes, and expend an amount of \$2,551,780 as well as the HOME carryover funds in an amount of \$1,261,292.36 from all years prior to program year 2023 (32nd) pursuant to the 2020-2024 Five-Year Consolidated Plan, and more specifically, the 2023-2024 Annual Action Plan for the 2023 Program Year to be submitted to HUD on May 17, 2023.

The financial impact of this Ordinance is the receipt of \$2,551,780 from HUD to the City of Toledo to provide affordable housing to low- and moderate-income individuals and families in the Toledo community. This Ordinance also authorizes the expenditure of HOME carryover funds in an amount of \$1,261,292.36 from all years prior to program year 2023 (32nd). NOW, THEREFORE,

Be it ordained by the Council of the City of Toledo:

SECTION 1. That the Mayor is authorized to submit the 2023-2024 Annual Action Plan to HUD, as well as, accept the 32nd (2023) Program Year HOME allocation from HUD in the amount of \$2,551,780 and deposit the amount received from HUD into Account Code 2025-16200-5GH3202STDREH (Toledo HOME Program Fund) pursuant to HUD regulations.

SECTION 2. That the appropriation in the amount of \$2,551,780 is authorized from the unappropriated grant proceeds in the Toledo HOME Program Fund into various accounts within 2025-16200, and further authorizing the expenditure of the same pursuant to Schedule A.

SECTION 3. The expenditure of a portion of the HOME carryover balance in the Toledo HOME Program Funds (2025) from all years prior to program year 2023 (32nd) in the amount of \$1,261,292.36 pursuant to Schedule B.

SECTION 4. That the Mayor and the Director of Housing and Community Development are authorized to enter into the necessary contracts or agreements to implement the activities and programs described in the 2023-2024 Annual Action Plan in furtherance of HUD objectives and pursuant to HUD regulations, directives and guidelines, as applicable and pertinent to the HOME Grant.

SECTION 5. That the Finance Director is authorized to issue warrant or warrants against Account Code 2025-16200 in an amount not to exceed \$2,551,780 from the HOME fund in payment of all obligations authorized under the 2023 (32nd) year and not to exceed \$1,261,292.36 from the HOME carryover balance from all years prior to program year 2023 (32nd) upon presentation of properly approved documentation.

SECTION 6. That this Ordinance is declared to be an emergency measure and shall take effect and be in force from and after its passage. The reason for the emergency is the fact that this Ordinance is necessary for the immediate preservation of the public peace, health, safety and property, and for the further reason that this Ordinance must be immediately effective in order to allow the City of Toledo to submit the 2023-2024 Annual Action Plan, qualify under the regulations of the HOME Investment Partnership Program, and to receive the money necessary to carry out its planned affordable housing development activities for the 32nd (2023) year beginning July 1, 2023, and ending June 30, 2024.

Vote on emergency clause: yeas 12, nays 0.

Passed: May 16, 2023, as an emergency measure: yeas 12, nays 0.

Attest:

Gerald E. Dendinger

Matt Cherry

Clerk of Council

President of Council

Approved:

May 16, 2023

Wade Kapszukiewicz

Mayor

Schedule A			
HOME PROGRAMMING FOR 32nd PY (July 1, 2023-June 30, 2024)			
HOME Administration	\$	255,178.00	
Community Housing Development Organization (CHDO) Set-aside	\$	382,767.00	
Home-owner Rehabilitation (Subrecipient & Internal)	\$	400,000.00	
Rental Housing Development	\$	1,000,000.00	
Down-Payment Assistance (HOME At Last Program)	\$	213,835.00	
Homebuyer Development	\$	300,000.00	
GRAND TOTAL	\$	2,551,780.00	

Schedule B	
HOME GRANT EXPENDITURE CARRYOVER FUNDS PRIOR TO 32nd PY	
Community Housing Development Organization (CHDO) Set-aside	\$ 253,815.15
Home-owner Rehabilitation (Subrecipient & Internal)	\$ 28,912.85
Rental Housing Development	\$ 789,360.80
Down-Payment Assistance (HOME At Last Program)	\$ 189,203.56
GRAND TOTAL	\$ 1,261,292.36