



July 1, 2022 – June 30, 2023 Draft CAPER

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

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Executive Summary

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

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

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

This year-end report provides an assessment of the accomplishments and financial expenditures for Program Year (PY) 2022 for the COT, encompassing July 1, 2022 through June 30, 2023. This report provides information to HUD and residents of the City of Toledo on funded programs and contains a comparison of actual accomplishments versus the goals of the five-year strategic and one-year plans.

For PY 2022-2023, the COT partnered with many agencies and organizations to address and accomplish the priorities of the Consolidated Plan. Additionally, other local, state, and federal organizations provided funds in the COT toward these same priorities, helping to leverage the dollars received through HUD. Most efforts were dedicated to the following highest priorities:

- Improvements to Public Facilities.
- Improvement of housing conditions through rehabilitation and repair of owner-occupied and rental property and housing code enforcement activities.
- Demolition of vacant structures.
- Assistance to social and human service organizations engaged in: foreclosure prevention, promoting educational and life-skills programs; feeding programs; access to health services; and legal assistance for housing issues.
- Ending Homelessness.
- Economic Development.

These activities continue to enhance neighborhood stabilization efforts directed towards the economic recovery of the COT and its residents. Much progress has been achieved in these areas, as demonstrated by the quantitative information provided in **Table 1: Accomplishments - Program Year & Strategic Plan to Date** are included in this report.

As the department continues to meet the goals and objectives identified in the 2020-2024 Five-Year Consolidated Plan, adjustments are made to reflect continuing changes in our economic and social environment. The slow recovery of the housing market continues to shift efforts from new construction to the rehabilitation and repair of homes. Additional efforts are focused on increasing the number of persons who can achieve homeownership in Toledo.

The COVID-19 pandemic and the subsequent Coronavirus variants continue to have a major impact on the COT and its residents. The added funding of the CARES Act has been essential in meeting new and challenging needs in the community, while the annual CDBG funds provide continued access to services for the most vulnerable residents.

CR-05 - Goals and Outcomes

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

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

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

The COT's 2022 (48th) Program Year (PY), encompassing July 1, 2022 through June 30, 2023, represents the 3rd year of the 2020-2024 Five-Year Consolidated Plan. The overall projects selected for funding were based not only on their ability to stimulate neighborhood revitalization, community development, and economic growth, but also on whether they addressed a priority goal identified in the 2020-2024 Five-Year Consolidated Plan.

Despite the continued challenges endured by the City as a result of the 2020 Pandemic and subsequent variants, the City was able to demonstrate continued progress in the 2022-2023 Annual Action Plan and 2020-2024 Five-Year Consolidated Plan projects.

The COT received CARES Act funding to be used to prevent, to prepare for or to respond to the Coronavirus (COVID-19). The city received **\$5,979,865** in Community Development Block Grant (CDBG-CV) funding and **\$4,875,338** in Emergency Solutions Grant (ESG-CV) funding. Of those funds received, the city has expended **\$4,697,768** of CDBG-CV and **\$4,741,188** of ESG-CV.

The first substantial amendment, included CDBG-CV and ESG-CV funding. With the CDBG-CV funding, the city was able to use these funds to fund activities such as: Business Assistance; Emergency Rental Assistance; Testing; Supplies and Cleaning; Food Security; Youth, Senior, and Special Populations Assistance; Legal Support, Outreach, etc. With the ESG-CV funding, the activities funded included: Emergency Rental Assistance, CoC Collaborative, Equipment, Supplies, Case Management, and Street Outreach. Some accomplishments through the use of CDBG-CV funds included: Business Assistance - **274** businesses assisted; Emergency Rental Assistance - **375** households assisted; Testing - **11,596** persons assisted; Supplies/Cleaning - **5,468** persons assisted; Food Security - **3,479** persons assisted; Youth, Senior, Special Populations - **1,493** persons assisted (**11** youth and **1,482** seniors); Outreach - **22, 844** persons assisted. With the use of ESG-CV, some accomplishments include: Emergency Rental Assistance - **406** households assisted; Equipment - **587** persons assisted; Street Outreach - **365** persons assisted; CoC Collaborative - **30,355** persons assisted (**9,289** Administration, **5,920** Supplies & Equipment, **7,032** Shared Services, **8,114** Staff Incentives & Pay).

The second substantial amendment, included CDBG-CV funding. With this CDBG-CV funding, the city implemented the Emergency Mortgage Assistance Program (EMAP) to stabilize owner-occupied housing for families during the continued pandemic crisis. Year-to-date, **62** households have been assisted for a total amount expended of **\$425,731.53**.

The third substantial amendment, included ESG-CV funding. The city of Toledo, in partnership with Toledo Public Schools (TPS), Toledo Lucas County Homelessness Board (TLCHB), and Lutheran Social Services of Northwestern Ohio, provided housing stabilization assistance to the families of TPS students. In total, **217** families have been assisted.

In February 2023, HUD approved the Neighborhood Revitalization Strategy Areas (NRSAs) for the City of Toledo's Department of Housing and Community Development. The Old South End and Englewood Areas are the designated areas.

The NRSA plan can be viewed on the City's website at

https://cdn.toledo.oh.gov/uploads/documents/Toledo-NRSA_Final-Application-10-21-22.pdf.

The department's focus remained on two of the three HUD national objectives: assistance to low- and moderate-income (LMI) individuals and the elimination of slum and blight in the community. Based on the priorities established in the Five-Year Consolidated Plan, the City will continue to emphasize providing adequate, safe, and affordable housing; eliminating homelessness; improving public infrastructure and facilities; implementing the Fair Housing Action Plan (FHAP); and providing assistance for basic needs such as food, life skills, and healthcare.

The DHCD administers the programs in conjunction with its community partners that assist in the rehabilitation or repair of homes, maintain the affordability of homes, address lead issues, and, in many cases, prevent homelessness.

Homeownership is still being addressed with HOME Investment Partnerships Program (HOME) funds. The department assisted **60** first-time homebuyers in making their purchases. In addition, the homeowners completed an eight-hour HUD-mandated homeownership training class. The training provided by a qualified HUD-approved counseling agency educated prospective homeowners how to understand the property acquisition process and the financial constraints of homeownership.

Community-Garden supported programs continue to decrease blight and beautify neighborhoods. Increased availability of fresh food strengthens the community by engaging residents and encouraging a sense of ownership and stewardship in low-income neighborhoods. The number of people served by community-garden-funded programs was **4,217**.

The Department of Economic Development activities included in the goals assisted businesses with technical assistance, grants and the creation of jobs. Economic Development for the period of July 2022 through June 2023 assisted **34** businesses and **8** jobs were created.

Through the Enterprise Development Loan (EDL) program, Economic Development received four (4) applications. Two (2) of the applications received will go before the Incentive Advisory Committee for review in August of 2023. The Department expects that at least one of these applications will be recommended for funding. One (1) of the applications received will go before the Incentive Advisory Committee in September of 2023 and one (1) application received was not chosen to be funded by the program. All applications received requested funds for the buildout of new space and the purchase of restaurant equipment.

The Façade Improvement Grant (FIG) program also provided assistance to businesses. Economic Development provided \$186,725 in CDBG funds to six (6) businesses. The program has switched from CDBG funding to City of Toledo General Fund funding. During the 2022-2023 PY, the Department of Economic Development received 53 applications. Eighteen (18) of the requests received were approved for funding upon conclusion of work. By December 1, 2023, a total of \$320,000 is projected to be awarded. The scope of work included improvements to the façade, windows, doors, awnings, painting, garage doors, and tuck pointing.

During the 2022-2023 PY, Economic Development expanded the White Box program. The White Box Grant assists property owners in bringing unoccupied commercial building first floor areas up to current state and municipal building rules, fire safety codes, and accessibility requirements. Economic Development received sixty-eight (68) applications during the 2022-2023 program year. Of those, eleven (11) were approved to be awarded funding upon completion of work. A total of \$295,886 in City of Toledo General Fund dollars and \$493,922.90 in ARPA Fund dollars are expected to be awarded by December 1, 2023.

In addition, two (2) applications were received for the Toledo Expansion Incentive (TEI) program. For the 20 existing TEI recipients who receive funds annually, funds will be awarded in August 2023 to those who reached their benchmarks. Economic Development also held 54 predevelopment meetings with businesses looking to expand their operation or locate in the City of Toledo, and made numerous referrals to partner agencies.

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

During the 2022 PY, TLCERAP disbursed approximately **\$19.75** million in rental and utility expenses for **3,006** LMI households in Toledo and Lucas County. Over 7,000 applications were submitted during this reporting period. The program will be active at minimum through December 29, 2022.

In addition to the efforts of the DHCD to reduce lead-based paint hazards, the COT revised and passed a new Lead-Safe Ordinance in September 2020. Under this Ordinance, 1-4-unit residential structures and family child care homes built prior to 1978 are to undergo and pass a lead clearance which includes a visual and dust-wipe inspection and register to receive a lead safe certificate.

The ordinance enacted a 5-year phase in schedule by census tract with a compliance phase scheduled every six months effecting approximately 45,000 total units; the first of ten phases by 06/30/2022, with full compliance by 12/31/2026. However, due to a law suit filed 6/27/2022 the COT agreed not to enforce the ordinance until 8/1/2022 in an attempt to resolve issues in the claim and avoid any protracted litigation. On 4/1/2023 a Judge granted a preliminary injunction to stop the Lead-Safe Ordinance from going into effect. On 6/22/2023 a Judge denied a motion to stop the Lead-Safe Ordinance from going into effect. Although the motion was denied the COT has decided to hold off on enforcement until the Judge makes a final ruling, which is expected to happen in August 2023.

There are approximately ten census tracts in each phase beginning with the highest at-risk areas. Currently there are a total of **3,431** rental units in compliance.

HUD CDBG Early Bird Matching Grant - this program was started in 2021 and ended June 1, 2023. This grant was used as an incentive for owners to comply with the new Lead-Safe 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. In total, **13** properties obtained a Lead-Safe Certificate after utilizing **\$38,366.63** from the Early Bird Matching Grant.

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

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

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

opened more than **150** cases to investigate housing discrimination, and more than **13,000** people were positively impacted by this work.

The Fair Housing Center also regularly conducts education and outreach activities to advance the Action Plan. This work has resulted in more than **20** million impressions realized, and well over **50** trainings conducted.

The DHCD continues to utilize the online application, electronic accomplishments, request for funds submission, and overall management of CDBG and ESG sub-recipients through ZoomGrants. HOME sub-recipients were added to ZoomGrants. In addition, the DHCD utilized the system to allow the Citizen Review Committee (CRC) to review, score, and make funding recommendations for CDBG, ESG, and HOME sub-recipients. By implementing this online process, the costs and time for reviewing applications have improved, improving the efficiency of managing CDBG and ESG sub-recipients, and the DHCD has realized tremendous cost savings for the Department.

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

The accomplishments table prescribed by HUD has been updated and contains comparison of actual accomplishments vs. the goals of the five-year strategic and one-year plans. The following table represents **Preliminary Data** related to accomplishments for the 2022 (48th) PY. The final data will be included in the final version of this CAPER.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Business Recruitment/ Retention Assistance	Non-Housing Community Development	CDBG: \$170,000 (carryover) \$500,000	Businesses assisted	Businesses Assisted	0	45		7	34	486%
Code Enforcement & Nuisance Abatement incl. Rental	Non-Housing Community Development	CDBG: \$1,235,824	Housing Code Enforcement/ Foreclosed Property Care	Household Housing Unit	200,000	115,211	58%	25,000	25,795	103%
Coordinated Access for Homelessness	Homeless Non-Housing Community Development	ESG: \$204,759 CDBG: \$112,054	Other	Other	1	1	100%	1	1	100%
Demolition/Clearance in Citywide Low Income Areas	Non-Housing Community Development		Buildings Demolished	Buildings	40	27	68%	0	0	0%
Establish and Maintain Community Gardens	Non-Housing Community Development	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,880	11,184	70%	3,245	4,217	130%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Fair Housing Planning & Services	Non-Housing Community Development	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	17,535	5,386	31%	3,507	1,327	38%
HOME Administration	Affordable Housing Public Housing Homeless	HOME: \$238,523	Other	Other	1	1	100%	1	1	100%
Home Buyer Down Payment/Closing Costs Assistance	Affordable Housing	HOME: \$100,000	Direct Financial Assistance to Homebuyers	Households Assisted	122	176	144%	15	60	400%
HOME CHDO Set-aside	Affordable Housing	HOME: \$357,784 (carryover) \$246,699	Homeowner Housing Added	Household Housing Unit	21	4	19%	5	3	60%
Home Repairs for Seniors and the Disabled	Affordable Housing Non-Homeless Special Needs	CDBG: \$450,000	Homeowner Housing Rehabilitated	Household Housing Unit	540	395	73%	146	137	94%
HOME: Home Buyer Development	Affordable Housing	HOME: \$200,000	Homeowner Housing Added	Household Housing Unit	5	16	200%	6	7	117%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Housing Rehabilitation Administration - CDBG	Affordable Housing	CDBG: \$900,000	Other	Other	1	1	100%	1	1	100%
Housing Repairs and Rehabilitation	Affordable Housing	CDBG: \$1,040,000 HOME: \$300,000 (carryover) \$289,837	Homeowner Housing Rehabilitated	Household Housing Unit	1,363	591	43%	179	195	109%
Housing/services for non-homeless special need pop	Affordable Housing Non-Homeless Special Needs		Other	Other	0	3	300%	0	0	0%
Improved Neighborhoods by Comprehensive Planning	Non-Housing Community Development	CDBG: \$115,025	Other	Other	1	6	600%	2	2	100%
Improvements to parks and community facilities	Non-Housing Community Development	CDBG: \$895,785 (carryover) \$1,414,215	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	60,000	7,949	14%	11,000	0	0%
				Other	5	4	80%	11	0	0%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Improvements to public infrastructure for LMI	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	541	433%	0	0	0%
Increase in transitional housing	Affordable Housing Homeless	CDBG: \$90,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	110	67	61%	21	15	71%
Increase number of emergency shelters	Affordable Housing Homeless	CDBG: \$56,000 ESG: \$296,755	Homeless Person Overnight Shelter	Persons Assisted	2,945	1,721	58%	775	901	116%
Increase or new public services	Non-Housing Community Development	CDBG: \$697,993	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	169,377	44,372	26%	13,134	10,593	81%
Job Creation/Retention incl. returning citizens	Non-Housing Community Development		Jobs created/retained	Jobs	7	27	386%	7	8	114%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Large rental housing/low-income housing tax credit	Affordable Housing	HOME: \$1,188,918 (carryover) \$1,352,784	Rental units constructed	Household Housing Unit	15	65	433%	30	58	193%
Local affordable housing capacity - public services	Affordable Housing		Other	Other	8	1	13%	0	0	0%
Permanent Supportive Housing	Affordable Housing Homeless		Housing for Homeless added	Household Housing Unit	810	52	6%	0	0	0%
Planning and Administration - CDBG	Affordable Housing	CDBG: \$1,199,705	Other	Other	1	1	100%	1	1	100%
	Public Housing									
	Homeless									
	Non-Homeless Special Needs									
	Non-Housing Community Development									
Rapid Re-Housing and Direct Financial Assistance	Affordable Housing Homeless	ESG: \$136,800	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	620	611	99%	80	216	270%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Slum and blight reduction	Non-Housing Community Development	CDBG: \$111,262	Housing Code Enforcement/ Foreclosed Property Care	Household Housing Unit	5,750	4,262	74%	1,025	1,180	115%
Small rental housing financing and education	Affordable Housing		Rental units rehabilitated	Household Housing Unit	12	6	50%	0	0	0%
Supplement Lead Hazard Grants for At Risk Families	Affordable Housing Lead Remediation Rehab		Homeowner Housing Rehabilitated	Household Housing Unit	150	23	15%	0	15	1500%
Targeted Neighborhood Home Repairs	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	40	16	40%	0	0	0%
Targeted Neighborhood Slum and Blight Reduction	Non-Housing Community Development		Other	Other	1	1	100%	0	0	0%
Transportation support	Non-Housing Community Development		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	1,050	240	23%	110	0	0%

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

COVID ACCOMPLISHMENTS			
FUNDING	PROJECTS	ACTUAL	UNIT OF MEASURE
CDBG-CV	CV-Business Assistance	274	Businesses Assisted
	CV-Emergency Rental Assistance	375	Households Assisted
	CV-Testing	11,596	Persons Assisted
	CV-Supplies/Cleaning	5,468	Persons Assisted
	CV-Food Security	3,479	Persons Assisted
	CV-Youth, Senior, Special Populations	1,493	Persons Assisted
	CV-Outreach	22,844	Persons Assisted
	CV-Emergency Mortgage Assistance Program (EMAP)	62	Households Assisted
ESG-CV	CV-Emergency Rental Assistance	406	Households Assisted
	CV-Equipment	587	Persons Assisted
	CV-Street Outreach	365	Persons Assisted
	CV-Toledo Public Schools Stabilization Program	217	Families
	CV-CoC Collaborative	30,355	Persons Assisted

Table 2 - COVID Accomplishments

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

The COT, as an entitlement community, received **\$7,373,648** in Community Development Block Grant (CDBG) funds plus **\$282,316** in program income, **\$2,385,225** in the HOME Investment Partnerships Program (HOME), and **\$638,314** in the Emergency Solutions Grant (ESG) for the 2022 (48th) program year. The activities carried out responded to the goals identified in the 2020-2024 Five-Year Consolidated Plan and the 2021 Annual Action Plan. The DHCD evaluated each project funded to ensure eligibility and compliance with CDBG, HOME, and ESG regulations. Potential applicants requesting funding are educated on the priority needs and goals as identified in the Five-Year Consolidated Plan. Each application funded must meet one of the priorities of the 2020-2024 Five-Year Consolidated Plan.

A significant portion of CDBG and HOME funds were used to address housing activities to provide affordable housing through the rehabilitation of owner-occupied or rental units and down payment assistance. Housing activities and code enforcement continue to be among the highest funding priorities for the DHCD. Other relevant activities, such as those related to the prevention and reduction of blight, basic needs, social services, and economic development activities, when combined with housing activities, strengthened the City's ability to assist low- and moderate-income persons and reduce blight in low-income neighborhoods.

The goals listed above in Table 1 represent the accomplishments during the program year 2021 for progress towards the goals established in the 2020-2024 Consolidated Plan and 2020 Annual Action Plan. Table 2 shown above (**COVID Accomplishments**) reports on the accomplishments of the completed COVID activities.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

The table below represents Preliminary Data related to racial and ethnic composition the individuals and families assisted in the 2022 (48th) PY. The final data will be included in the final version of this CAPER.

	CDBG	HOME	ESG
White	6,918	31	301
Black or African American	8,526	54	477
Asian	119	0	0
American Indian or American Native	318	1	4
Native Hawaiian or Other Pacific Islander	18	0	2
Total	15,899	86	784
Hispanic	1,240	3	78
Not Hispanic	14,659	83	706

Table 2 - Table of assistance to racial and ethnic populations by source of funds

Narrative

Data regarding those who received CDBG, HOME, ESG, and CDBG-CV assistance is shown in the table above.

The data shows that under CDBG **54%** and HOME **63%** are minorities (mostly Black or African American). Additionally, CDBG **8%** and HOME **4%** are Hispanic.

The table above does not represent all the racial and ethnic persons or families assisted; below are additional categories also reported in IDIS:

- American Indian/Alaskan Native & White - **3**
- Asian & White - **0**
- Black/African American & White - **28**
- American Indian/Alaskan Native & Black/African American - **2**
- Other Multi-Racial - **644**

Of the above categories not reflected in the table, **114** or **17%** of the persons or families served were Hispanic.

The ESG racial composition of beneficiaries reported above can be seen in the SAGE report. The data shows that **61%** of those served were Black or African American and **10%** were Hispanic. Additionally, **127** individuals reported being of multiple races and **17** individuals “client did not know” or “client refused” to provide the information and 3 “no information was collected”.

As illustrated in the maps (see maps in attachments), the largest concentration of minorities within Toledo lives in the low- and moderate-income census tracts.

In adherence to HUD regulations, the COT allocated at least 70% of its 2022-2023 CDBG entitlement award to programs that directly benefitted low- and moderate-income individuals and families.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

The table below represents **Preliminary Data** related to the amounts expended in the 2022 (48th) PY. The final data will be included in the final version of this CAPER.

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	9,570,179	7,322,900
HOME	public - federal	4,274,545	4,232,936
ESG	public - federal	638,314	612,745
American Rescue Plan Act (ARPA)	public - federal	950,000	0
Continuum of Care	public - federal	4,476,415	3,653,756
HUD Office of Lead Hazard Control and Healthy Homes	public - federal	5,024,078	897,545
CDBG-CV	public - federal	1,449,694	432,645
ESG-CV	public - federal	34,234	698,333
United States Department of Treasury	public - federal	22,706,231	24,410,936
Lead Hazard Control and Healthy Homes	public - federal	978,813	11,147
Neighborhood Stabilization Program (NSP)	public - federal	500,207	179
Ohio Department of Health SCHIP Grant	public - federal	303,864	155,855
Ohio Department of Health	public - federal	500,000	276,800
Lucas County Land Reutilization Corp. (Land Bank)	public - local	4,450,000	0
BP Husky Settlement	private	1,035,005	240,924

Table 3 - Resources Made Available

Narrative

The table above represents the amount of resources available and the amount expended in 2022 (48th) PY. Other funding sources included expenditures through the Land Bank, United States Department of Treasury, CDBG-CV, ESG-CV, Lead Hazard Control and Healthy Homes, Neighborhood Stabilization Program (NSP), 2017 Lead Hazard Control and Health Homes, BP Husky Settlement, and Greater Toledo Community Foundation.

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

The city of Toledo also received CARES Act funding to be used to prevent, to prepare for or to respond to the Coronavirus (COVID-19). The city received **\$5,979,865** in Community Development Block Grant (CDBG-CV) funding and **\$4,875,338** in Emergency Solutions Grant (ESG-CV) funding. Of those funds received, the city has expended **\$4,697,768** of CDBG-CV and **\$4,741,188** of ESG-CV.

Identify the geographic distribution and location of investments

The table below represents **Preliminary Data** related to the Actual Percentage of Allocation in the 2022 (48th) PY. The final data will be included in the final version of this CAPER.

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Garfield/Starr/Raymer	1	1	Targeted Investment Area
Junction/Englewood	1	3	Targeted Investment Area (proposed NRSA)
Old South End	1	1	Targeted Investment Area (proposed NRSA)
Citywide	94	94	
Low to Moderate Income & Slum and Blight	3	1	

Table 4 - Identify the geographic distribution and location of investments

Narrative

Toledo neighborhoods' redevelopment and stabilization are still being impacted by national economic conditions. Neighborhoods that were once vibrant are suffering from problems including an aging housing stock, a rise in abandoned and dilapidated structures that add to blight, and a lack of chances for economic development. Investments were prioritized to benefit low- and moderate-income individuals, including minorities, seniors, and persons with disabilities.

The DHCD concentrated its efforts in the most economically disadvantaged areas of the city. To reach the goals identified in this plan, efforts were concentrated in those census tracts where more than 51% of the population is low- and moderate-income (please see maps in attachments).

The low- and moderate-income census tracts are: 8, 9, 10, 11, 12.02, 13.02, 14, 15, 16, 17, 18, 19, 20, 22, 23, 24.01, 24.02, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 42, 46, 47.01, 47.02, 48, 49, 50, 51, 52, 53, 54, 57.01, 59.02, 66, 67, 68, 73.02, 73.03, and 103.

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

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

The COT, in adherence to HUD regulations, allocated at least 70% of its 2022-2023 CDBG entitlement award to programs that directly benefit low- and moderate-income individuals and families.

Leveraging

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

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

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

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

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

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

Table 5 – Fiscal Year Summary - HOME Match Report

The tables below represent **Preliminary Data** in the 2022 (48th) PY. The final data will be included in the final version of this CAPER.

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

Table 6 - Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
103,459	835,862	240,668	84,479	698,654

Table 7 - Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	59,424	0	0	0	0	59,424
Number	9	0	0	0	0	9
Sub-Contracts						
Number	57	0	0	2	3	52
Dollar Amount	286,872	0	0	4,300	20,403	262,169
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	313,864	0	313,864			
Number	9	0	9			
Sub-Contracts						
Number	57	2	55			
Dollar Amount	286,872	7,730	279,142			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	11	1	0	2	2	6
Dollar Amount	801,652	0	0	0	0	0

Table 9 - Minority Owners of Rental Property

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

Table 10 - Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

The tables below represent **Preliminary Data** in the 2022 (48th) PY. The final data will be included in the final version of this CAPER.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	245	226
Number of Non-Homeless households to be provided affordable housing units	260	323
Number of Special-Needs households to be provided affordable housing units	120	137
Total	645	686

Table 11 - Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	285	226
Number of households supported through The Production of New Units	25	58
Number of households supported through Rehab of Existing Units	305	335
Number of households supported through Acquisition of Existing Units	30	67
Total	645	686

Table 12 - Number of Households Supported

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

In the table above, the one-year goal was estimated in the Annual Action Plan. The actual numbers for 2022 (48th) PY are reported with details below on the goals.

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

The "Production of New Units" goal was not met due to a few variables. One being a lack of contractors and another being higher than normal cost of materials. DHCD anticipates the completion of the New Unit projects in PY 2023.

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

Discuss how these outcomes will impact future annual action plans.

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

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

The Housing staff will make it a priority to reach out to the contractor pool to complete HOME activities. The rehab staff will also work vigorously with contractors to try and achieve finalization of jobs.

The team will review Integrated Disbursement Information Systems (IDIS) in an effort to stay on top of jobs that may be lingering in the open stage as well as to ensure timely close-out of projects. This will also ensure that projects are completed during the appropriate program year.

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

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

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	104	10
Low-income	133	26
Moderate-income	19	50
Total	256	86

Table 13 - Number of Households Served

Narrative Information

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

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

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

The CoC has fully integrated all street outreach efforts into the local coordinated entry system. Individuals and families are assessed where they are and are 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. Street Outreach projects assess, prioritize, and re-assess the need for essential services related to street outreach and 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. Referrals to permanent supportive housing or rapid re-housing that can quickly assist in obtaining safe, permanent housing are prioritized over the provision of or referral to emergency shelter. Emergency hotel and motel funds are used to bridge the gap between referral to a permanent housing project and entry into housing. Street Outreach Teams include:

Neighborhood Properties, Inc. PATH Team, which holds the Substance Abuse and Mental Health Services Administration (SAMHSA) Projects for Assistance in Transitioning from Homelessness (PATH) grant locally and is CoC funded as well. PATH is a formula-based program, designed to support assertive outreach, a known effective technique to support service delivery to individuals with severe and persistent mental illnesses (SPMI), co-occurring SPMI and substance use disorders, and persons experiencing homelessness or at imminent risk of homelessness. PATH helps participants navigate documents, applications, and appointments needed to get housing and treatment. PATH participants are encouraged to connect to local social services, health services, and community resources and are eventually linked to housing. PATH typically works with a person for 90 days, with the end goal of identifying and guiding homeless individuals to supportive housing and mental health care.

The CoC regularly coordinates with NPJ's PATH team for community-wide rapid resolution efforts where individuals may be displaced (encampments, hotels closing, code enforcement). This team proactively and reactively responds to needs by canvassing our geographic area daily. They interact with individuals on the streets, in encampments, in parking lots and cars, under bridges, behind shopping centers, and in other areas of high concentration of unsheltered homelessness. During engagement, they survey the individual to assess their needs and vulnerabilities as well as their willingness to engage.

The Zepf Center Safety Net's Street Outreach Program (SOP) engages runaway youth in need. Zepf provides crucial services to the community and operates the only youth emergency drop-in shelter in Lucas County for youth 17 years of age and younger. Zepf has been performing youth-oriented street outreach since 2019, providing services for runaway and homeless youth and youth at-risk for trafficking. In addition to providing outreach on the streets and other spaces where youth congregate, this funding also supports the area's only Drop-in Center that specializes in the needs of Runaway and Homeless Youth. During the COVID-19 pandemic, Zepf Center maintained services to the community, including keeping Safety Net open and keeping the SOP team out in the community. Safety Net works in collaboration with the Lucas County Human Trafficking Coalition, the Partners Against Trafficking in Humans (PATH) Program, and the Toledo Runaway Task Force. The SOP actively engages with youth experiencing homelessness with the intent of building supportive relationships, providing meaningful advice and support, and enhancing the possibility that youth will engage in services to exit homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

Through ESG and CDBG, the COT supports three emergency shelters, one transitional housing project, and the centralized entry process within Toledo. The projects funded include:

Leading Families Home (LFH) has served as an emergency shelter for over 100 years. Leading Families Home offers services for behavioral health and substance abuse. Participants are not required to accept any services, but they are always made available if the participant chooses to do so. They also offer classes and support groups for parenting, anger management, human trafficking, and domestic violence. These classes and support groups are led by QMHS-certified employees. The history of these classes and groups exceeds 15 years in practice, although they have just joined our emergency shelter and housing programs in 2021. There is no fee for our clients to engage in any of these all behavioral health and substance abuse services are conducted by licensed social workers and counselors. LFH employs licensed social workers to provide trauma-informed groups, mental health services, and SUD services in our emergency shelter. Notably, the City of Toledo worked closely with LFH to open a new emergency shelter, which will add an additional 75 bed units to the emergency shelter capacity for our community.

St. Paul's Community Shelter has provided emergency shelter for homeless adults battling mental illness since 1978. SPCC provides a safe place for the homeless community to receive mail, take showers, charge electronic devices, and wash laundry. The agency provides more than 75,000 meals for the homeless community and opens space overnight during the coldest months to prevent deaths in the winter. Caring and compassionate case managers are available to assist individuals at the street level, in shelters, and after permanent housing placement.

Family House is the largest emergency shelter that serves families. Programming provided includes: case management services; referral and access to an onsite community health worker; transportation assistance; financial assistance with rent deposits; basic needs for transition; birth certificates and identification; food pantry; diapers; clothing closet; three meals per day; onsite daycare; housing applications and leads (as available); and landlord engagement.

Aurora Project, Inc. is a transitional housing project that serves homeless women and children with high barriers to permanent housing. Aurora offers access to intensive case management, budgeting and financial programming, GED classes, Relapse Prevention, Computer Skills Training & Lab, Nutrition Education, DV assessments, Women's AA meetings, yoga classes, trauma-informed trainings, transportation services, creative writing classes, self-esteem classes, housekeeping workshops, limited aftercare follow-up, creative expressions classes, parent education, and cooking classes through a variety of partnerships.

There are several obstacles that continue to negatively affect the system's ability to move people quickly into permanent housing:

- Local housing authorities have restrictive eligibility standards that exceed HUD's mandated restriction limits, especially those regarding criminal history, past public housing evictions, and current public housing debt restrictions.
- Limited turnover of permanent supportive housing units, which limits the number of new units and beds available.
- A limited number of new permanent supportive housing units are being created, which limits placement only to those existing beds that turnover.
- Limited number of private landlords willing to accept the local housing authority's housing vouchers or other subsidized vouchers (including CoC subsidies), which minimizes the pool of readily available units from which to choose to rent.

- Limited pool of flexible funds to use to incentivize landlords to accept vouchers and other local subsidies and minimize landlord losses due to damage or non-payment.

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

Coordination with Managed Care Organizations and Healthcare Resources: The CoC has engaged with a variety of managed care organizations to coordinate and address needs of persons experiencing homelessness who have engaged the healthcare system. Additionally, the CoC has worked with all major healthcare systems within the jurisdiction around discharge planning and the integration of data collection into HMIS to create a more seamless process to connect individuals and families with housing and supportive services.

Reentry Coalition Workgroup: A number of relevant stakeholders coordinate with the reentry population to ensure pre-discharge planning to ensure immediate access to housing and supportive services, including a special voucher program dedicated to the reentry population. Additionally, Volunteers of America Chestnut Hill is a permanent supportive housing project with dedicated beds for the reentry population.

Veterans by Name List Committee and SPDAT List/Children with Families Master List Committee by the local CoC: These committees continue to review current cases of existing veterans, families with children, or singles who are also experiencing homelessness to identify ongoing barriers and potential action steps to move them quickly into permanent housing.

Chronic Homelessness Housing First/No Barriers Housing Core Leadership Team: No Barriers Housing is the taskforce created to quantify the past and current number of persons experiencing chronic homelessness, to identify national and local best practices that have demonstrated reductions in chronic homelessness, and redesign and fully implement the Housing First Model that will lead to quicker housing placements and reduce returns to homelessness among the hardest to serve (chronic homelessness). This taskforce has established a special voucher program for people experiencing chronic homelessness in coordination with Lucas Metropolitan Housing (LMH), the Mental Health and Recovery Services Board (MHRSB), Unison Health, St. Paul's Community Center, and other providers.

Housing Problem Solving (HPS) Pilot Program: TLCHB and Gryphon Place 2-1-1 have collaborated to secure funding for the Housing Problem Solving Pilot Program (HPS), which will seek to expand capacity for prevention, diversion, and rapid resolution activities throughout the Continuum. HPS techniques can be applied to homelessness prevention strategies, coordinated intake and assessment, outreach, and shelter services to assist households in avoiding homelessness or exiting homelessness as quickly as possible at any point in the homeless response system. HPS is a person-centered, housing-focused approach to exploring creative, flexible, safe, and cost-effective solutions to quickly resolve the housing crisis, even if just temporarily, with limited or no financial support. Households may return to a prior residence, relocate to confirmed safe housing, stay with friends or family, or secure a new tenancy.

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

Adoption of Housing First: As the Collaborative Applicant and HMIS Lead, the Toledo Lucas County Homelessness Board (TLCHB) serves as the Lead Agency for the CoC. Over the past several years, TLCHB has worked with the Board of Lucas County Commissioners (County), the City of Toledo (City), Lucas Metropolitan Housing (LMH), and the Lucas County Mental Health and Recovery Services Board (MHR SB) to reimagine our local homelessness response system. This coalition served as lead partners for the development and implementation of the No Barriers Housing Initiative, 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 to build a service delivery model to ensure all experiences of homelessness are rare, brief, and non-recurring.

Partnering and Leveraging Public Housing Authority Resources: TLCHB and LMH recognize that homelessness and housing instability continue to be serious problems in Lucas County. One important and immediate direct outcome of this partnership was that LMH modified its Admission and Continued Occupancy Policy (ACOP) to drastically improve the accessibility of housing for those who have a criminal record.

LMH updated its Administrative Plan to change the total number of Supportive Housing Vouchers and create the No Barriers Housing Voucher Program (housing first vouchers) dedicated to persons experiencing chronic homelessness.

LMH amended the Administrative Plan to add additional language regarding administering 123 Emergency Housing Vouchers. TLCHB entered into a service contract with LMH to coordinate services to be provided to eligible EHV individuals or families. In consultation with LMH, TLCHB consulted with CoC and community stakeholders to determine an equitable prioritization and ongoing evaluation process to ensure appropriate referrals for eligible individuals and families. Additionally, TLCHB has served as a primary agency to coordinate with community resources and service providers to support housing search assistance as needed, consistent with HUD Notice PIH 2020-15. All 123 EHV are leased or utilized and the success of this program provided much greater capacity to house persons experiencing homelessness.

Landlord Engagement: Landlord recruitment has never been more important, not just to add housing options but to prevent an increase in unsheltered homelessness and additional strain on a system with limited resources. The CoC's Eviction Prevention Partnership, a multi-agency consortium comprised of eleven local agencies and organizations dedicated to providing a holistic approach to eviction prevention, served 169 households with a total of 214 adults and 167 children. TLCHB created a full-time Eviction Prevention 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. Since the implementation of this program, TLCHB has seen an increase in landlords previously served through this program proactively reaching out to the eviction prevention coordinator to avoid eviction with other tenants.

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

Actions taken to address the needs of public housing

During the 2022 Program Year Lucas Metropolitan Housing (LMH) accomplished the following:

STRATEGIES:

- a. **New Strategic Plan developed.**

ACTIONS COMPLETED:

Lucas Metropolitan Housing's (LMH) efforts to develop a comprehensive, updated five-year strategic began in fall of 2022 with LMH engaging EJP Consulting Group (EJP), a national leader in providing consulting services to public housing agencies, to help us in our planning. Together, LMH and EJP have undertaken an extensive community engagement process that includes interviews, group sessions and surveys.

The goals were to:

- Identify key themes and areas of both opportunity and concern.
- Learn more about the public perception of LMH.
- Develop specific objectives on how best to address the needs of our community moving forward.

To date, LMH and EJP have completed phases 1-3 of the planning process which are as follows:

- a. Project planning and coordination; and
- b. Data collection; and
- c. Stakeholder interviews

The final Phases 4-6 will begin in August of 2023 – December of 2023 and include the following:

- a. In person strategic planning retreat; and
- b. Initial draft of the strategic plan; and
- c. Final draft and approval of a new strategic plan and publication

The goals and objectives identified in this new plan will be implemented beginning in 2024 through 2028. Along with communicating its new plan, LMH intends to report to stakeholders the results and outcomes of its 2019-2023 plan early 2024.

b. Portfolio Repositioning Strategy

- Create housing opportunities in existing high opportunity neighborhoods.
- Improve neighborhood conditions to create mixed income communities of choice.

ACTIONS COMPLETED:

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.

Status: Implemented first Tier of Portfolio Repositioning Strategy at TenEyck Towers. LMH engaged developer partner Gorman USA in the fall of 2022. In the spring of 2023, LMH held the required preliminary resident meetings in preparation for submission of application for a commitment to enter into a Housing Assistance Payment (CHAP). 100% inspection of the 154-apartment building was completed, and a preliminary project budget has been completed. Next steps will be submission of the Financing Plan.

- a. LMH will grow the number of apartment homes available through a combination of New Construction, Renovation, Acquisition, Project Based Vouchers (PBV), Project Based Rental Assistance (PBRA), Housing Choice Vouchers, Low-Income Housing Tax Credits and by leveraging Rental Assistance Demonstration (RAD).

Status: LMH issued Project Based Vouchers to the following new construction developments in the City of Toledo - Warren Commons (60 Vouchers), Park Hotel (45 Vouchers). LMH received an approved CHAP for Collingwood Green Phase IV - (Transfer of assistance of 20 Public Housing units to Project Based Rental Assistance), Swan Creek Crossings LLC - (28 PBV), Thurgood Marshall Senior Housing LLC- (53 PBV).

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

Status: Partnering with Evergreen Residential Preservation Specialist to renovate Palmer Gardens a 75-apartment family complex located in a high opportunity neighborhood of Toledo Old Orchard.

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

Status: LMH has begun the implementation of Initial Projects for the 10-year Portfolio Repositioning Strategy. There will be an investment of \$200 Million in project see the below Chart:

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

Status: See below chart outlining the timeline of each project.

- e. Close on the following initial projects investing \$200 million.

Status: See below chart outlining the closing timeline of each project

Park Apartments	Youth Aging out of Foster Care	45 Apartments	\$14 Million Investment
Collingwood Green IV	Families	50 Townhomes	\$20 Million Investment
Collingwood Green V	Elderly	75 Apartments	\$28 Million Investment
Palmer Gardens	Families	75 Apartments	\$15 Million Investment
McClinton Nunn Homes	CNI Transformation Families and Elderly Mixed Income	400+ Housing Units	\$50 Million Investment
Ten Eyck Towers	Elderly /Disabled	154 Apartments	\$19 Million Investment

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

- c. **Establish Pathways to Self-Sufficiency:**

ACTIONS COMPLETED:

a. Establish FOC at LMH

Lucas Metropolitan Housing has received a designation as a Financial Opportunity Center (FOC). LMH is the first housing authority in Ohio to receive this designation. FOCs are on-site career and financial coaching service centers that help families living on a low- to moderate-income build effective money habits and focus on the financial bottom line.

Status: Between July 2022 and December 2022, LMH devoted time to planning for the launch of FOC. In late October 2022, the first FOC coach was hired. The residents of Ravine Park Village, Weiler Homes, and Birmingham Terrace started receiving FOC services in January 2023. The FOC Coordinator was hired in January 2023, and two more coaches joined the team in May and June 2023.

Highlights: Since January 2023, residents who have been working with a FOC coach and placed in jobs are now receiving a salary above the living wage. A total of 72 residents have received income support and have been connected to various resources. Over half of the residents who applied for a benefit have been approved and are now receiving it. Thanks to the bundled services received, the net worth of 28 residents has increased.

b. Leverage LMH's Housing Choice Voucher (HCV) Program to promote self-sufficiency and homeownership.

Status: Seven (7) HCV participants bought homes utilizing their vouchers. Three (3) of the seven (7) participants bought homes from Lucas Housing Services Corporation (LHSC), LMH's non-profit affiliate.

c. Increase the sources of financial assistance to make homes affordable and connect families to resources for down payment and closing cost assistance.

Status: LMH's non-profit affiliate LHSC provided soft second mortgages to fourteen (14) first-time home buyers, saving them up to \$50 per mortgage payment as well as providing equity and in some cases eliminating the requirement for Mortgage Insurance Payments. LHSC also worked with multiple lenders who were able to access the City of Toledo's down payment assistance for up to \$7,500 in some areas for down payment and closing cost assistance.

d. 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.

Status: LHSC, partnered with several lenders to host several pre-qualification events leading up to a parade of homes and auction. Over 100 residents of LMH and Lucas County participated in the pre-qualification events and over 30 participants received pre-approvals from the lenders who participated in the events. They were Huntington Bank, Fifth Third Bank, Premier Bank, State Bank and Citizens Bank.

e. Strengthen partnership with LMH's non-profit affiliate Lucas Housing Services Corporation to increase the offer of sustainable and affordable homeownership opportunities.

Status: LHSC continued its partnership with other agencies to improve the sustainability of the agency. LHSC received funding from partner lenders, the City of Toledo and LISC. In the next program year LHSC will apply for a grant to hire a consultant to review LHSC's operations with the goal of sustainability and improvement.

Actions taken to provide assistance to troubled PHAs

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

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

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

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

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

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

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

One barrier to the development of affordable housing is the City of Toledo's current zoning code's restrictions on the development of group homes for persons with disabilities. The Fair Housing Center has proposed changes to the zoning code to eliminate this barrier. This proposal is current pending in committee before the City's legislative branch after it received opposition from local residents. The proposal can be removed from committee and passed by City Council.

Over the past year, some opposition to the development of affordable housing has occurred. This arose primarily during the zoning approval phase of the development process. However, in most instances, the City was successful in approving the zoning applications for affordable housing.

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

The needs of the underserved for housing, community development, and basic needs services are tremendous. The amount of funding available to effectively implement and run these programs is limited, which creates an

obstacle for many of the agencies that assist low- to moderate-income individuals, families, and/or neighborhoods.

The goals outlined in the Strategic and Action Plans are aimed at meeting underserved needs. The Strategic Plan identifies affordable housing as the primary priority. Other priority relating to fundamental basic needs, however, were also highlighted. The COT is devoted to fulfilling the needs of the underserved population, whether through programs it administers or programs implemented in conjunction with community partners.

In regards to Affordable Housing, the COT is promoting affordable housing through owner-occupied rehabilitation and other initiatives. The city is ensuring that it adheres to environmental protection laws, preserving older housing stock, and offering new homeownership opportunities to first-time homebuyers, senior citizens, individuals with disabilities, and other special needs populations. This effort, while made more difficult due to the increased need for services, utilized many local agencies and programs that promote and foster stability within the housing market.

Through the HOME grant, the city offered several programs designed not only to promote and maintain homeownership but also to address issues that may deter or prevent homeowners from taking the risk of foreclosure in the area.

The Tenant Landlord Services Manager position was created as result of the need identified in the Comprehensive Housing Strategy to focus on systems, infrastructure, legislative recommendations and enforcement, and data analysis related to tenants and landlords. This includes standing up systems to increase utilization of various tenant protections to include rent escrow, Right to Counsel, and Pay to Stay. Significant activities during the period include developing and launching separate community wide survey for tenants and landlords. The results of the survey will be used for the purpose understanding the needs in the rental market and to help community partners with data and their program development.

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

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

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

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

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

The DHCD receives funding to administer dedicated lead-based paint hazard control activities through the

Lead-Based Paint Hazard Control Grant program. Funding sources include the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH), which includes both the Lead Hazard Reduction grant as well as the Healthy Homes and Weatherization Coordination Demonstration Grant (HHWCD), the Ohio Department of Health's (ODH) Medicaid SCHIP, the Toledo-Lucas Regional Health District BP-Husky settlement (which is now Cenovus after the buy-out from BP), and the Community Development Block Grant for supplemental funding on high-cost units.

During the PY 2022 reporting period, the DHCD continued to administer OLHCHH grants along with the remaining three dedicated lead-based paint hazard control funding sources.

Aggregate results from the dedicated lead-based paint hazard control activities during PY 2022 included **79** eligible units enrolled, **21** units having received a comprehensive Lead Inspection/Risk assessment and **35** units achieving lead clearance (**11** owner-occupied and **24** rental). This equates to a total of **\$725,548.00** investment into the community, assisting 29 families with 23 children under the age of six in providing a lead-safe environment; additionally, 25 persons between the ages of 6-17 years of age and 43 persons 18 years of age and above were also positively impacted with a lead-safe unit in which to reside, with an average household income of 34.9% AMI.

Additionally, the HCD provides ancillary lead-based paint hazard control activities through its other housing programs as well. The HCD administers owner-occupied rehabilitation, rental rehabilitation, the Lead Based Paint Hazard Control grant program (**LBPHC**), Tenant-Based Rental Assistance (**TBRA**), and CHDO programs, which are required to incorporate lead inspections and/or assessments on any unit the HCD evaluates. For rehabilitation projects, properties with lead hazards utilize component abatement, interim controls, standard practices, or lead-safe work practices. State-licensed lead abatement contractors and personnel, along with Certified Lead Renovation, Repair, and Painting contractors are used in accordance with federal regulations. All units are required to pass a final lead clearance examination upon completion of all work. For PY 2022, the DON continued to conduct Housing Quality Standard (**HQS**) inspections for TBRA programs, ensuring compliance with 24 CFR 982.401, for eight units that were performed by licensed Lead Risk Assessors.

In PY 2022, the DHCD was able to make two owner-occupied units lead-safe through the HOME-funded Owner-Occupied rehabilitation program.

Homes awarded down-payment assistance through HOME funds were inspected for lead. Results of assessments and actions needed to meet city, state, and federal regulations require that the dwelling meet minimum property standards, and no deteriorated paint in excess of the following was found: 20 sq. ft. of exterior or 2 sq. ft. of interior surface, or 10 percent or more of any building component with a small surface painted area. In PY2022, **60** Down Payment Assistance grants were provided, with **60** lead visual assessments completed.

In addition to the efforts of the DHCD to reduce lead-based paint hazards, the COT revised and passed a new Lead-Safe Ordinance in September 2020. Under this Ordinance, 1-4-unit residential structures and family child care homes built prior to 1978 are to undergo and pass a lead clearance, which includes a visual and dust-wipe inspection, and register to receive a lead-safe certificate. To date, **3,429** units are complying out of approximately 40,000 estimated affected units. The ordinance activities will also generate a lead-safe unit registry to be developed and maintained by the Lucas County Regional Health District.

The DHCD also offered an "Early Bird" grant to rental property owners to offset some of the costs of complying with the ordinance and receiving a lead-safe certificate for their unit. A total of **\$43,891.00** was provided for **17** units.

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

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

The goals of the Consolidated and Action Plans are aimed at reducing the number of poverty-level individuals and families in Toledo, and many organizations work together to address the issue of poverty. The goal of these efforts is to create a community of individuals and families who achieve their human potential through education, income stability, and healthy lives.

The Department of Housing and Community Development engages in housing and community development programs that assist families living at the poverty level. Housing programs are planned to have a positive overall effect on households in the following areas: economic development, family stabilization, health improvement, homeownership, and community growth.

Other non-housing programs related to economic development assist in the creation or retention of businesses and jobs in the construction, finance, entertainment, and other industries that indirectly benefit from increased business. Many of these programs contribute to community growth and make Toledo more attractive to business and individual investments, thereby increasing opportunities for improved incomes for Toledo residents.

Additionally, organizations like ProMedica, Mercy Hospital, and community development corporations' partner with organizations to geographically target specific low-income and depressed areas of the City. Wherever possible, the DHCD participates in those partnerships.

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

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

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

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

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

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

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

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

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

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

The Fair Housing Center (TFHC) completed an Analysis of Impediments (AI) to identify the fair housing barriers that will be addressed from 2020-2024. The AI includes action steps for the removal of fair housing obstacles in its Fair Housing Action Plan (FHAP).

The Fair Housing Center Key Highlights include:

- The Fair Housing Center continues to handle a significant number of fair housing cases, assisting individuals experiencing housing discrimination. This work is made possible by CDBG funding from the City of Toledo and funding directly from HUD. During the reporting period, the Center received more than 2,000 intakes and opened more than 150 cases to investigate housing discrimination, and more than 13,000 people were positively impacted by this work.
- The Fair Housing Center also regularly conducts education and outreach activities to advance the Action Plan. This work has resulted in more than 20 million impressions, and well over 50 trainings.
- TFHC continues regular meetings and reviews KeyBank's loan program. As of January 2023, KeyBank had implemented about \$1.5 million in loans in LMI neighborhoods as a result of the settlement agreement with TFHC. Starting in 2023, TFHC will be meeting with all the largest local banks in Toledo to discuss their CRA commitments.

At the end of 2022, Fifth Third notified its members and the Office of the Comptroller of the Currency that it would be closing an important branch location in Toledo. The Fair Housing Center and others in the community are reviewing this issue and the impact it will have on Toledo. Fifth Third recently indicated that it would be selling the branch that it chose to close to a local credit union at a below-market rate for the property. The OCC has committed to providing a listening session for the Toledo

area. The Fair Housing Center plans to work with local groups to prepare for the listening session and also educate more community groups on the CRA and CRA advocacy.

- The Fair Housing Center has proposed a change to the City of Toledo's Zoning laws to better welcome group homes and eliminate barriers to the establishment of group homes within the City of Toledo. The proposed change to the zoning code is presently pending in committee before the City Council after it encountered discriminatory opposition from the public.
- The Fair Housing Center drafted and the City of Toledo enacted a law that prohibits discrimination on the basis of source of income in an effort to advance the goals of the Fair Housing Act. This occurred in 2020. Over the last year, for this reporting period, the City and the Fair Housing Center have worked together to ensure strong implementation of this law. Presently, the City is working on hiring personnel to oversee the implementation of the law, including a local investigator and a mediator to help with these cases.
- The City has made significant efforts to implement a local law to prevent lead poisoning. Unfortunately, the City encountered a lawsuit that has delayed implementation of the law. The Center and the City continue to meet regularly and work closely together to advocate for the successful implementation of the law. In addition, the Center has launched a new program that provides legal assistance to persons experiencing housing discrimination and is focused on areas that have experienced redlining and disinvestment to counteract the prevalence of substandard housing conditions in the Toledo area as a barrier to fair housing choice.

The TFHC provides quarterly and annual updates to the City on the FHAP action steps that are undertaken to address barriers to housing choice identified in the 2020-2024 Analysis of Impediments to Fair Housing Choice. **(Please see the annual update on the FHAP for more detailed information in the attachments)**

CR-40 - Monitoring 91.220 and 91.230

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

The DHCD oversees compliance for CDBG, ESG, HOME, LEAD, and NSP. Written agreements with partners and beneficiaries are executed based on approved, eligible projects. Monitoring of CDBG and ESG partners includes a monthly review (or more, if needed) of activities to ensure regulatory compliance, including financial information, ongoing operations, eligibility, performance, procurement policies and practices, and effective communication with governing boards. Progressive Corrective Actions (PCAs) are used to ensure compliance.

On a monthly basis, Third-Party Partners (TPPs) electronically submit the following through the online system, ZoomGrants:

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

In addition, a Program Monitoring Specialist conducts monthly onsite visits. At the monthly onsite visits, the Program Monitoring Specialist reviews and evaluates client files, financial records, and pertinent information regarding the CDBG and/or ESG-funded activities. The information is recorded via a “Monitoring Tool” where the following is reported, accuracy is verified, and compliance is evaluated:

- Drawdowns
- Administrative documents (including Financial Audits)
- Monthly reports (performance, financial, and board documentation)
- Internal Controls
- Taxes and Financial documentation
- Activities, objectives and outcome verification
- Progressive Corrective Action (PCA), if applicable
- Match proof and supporting documentation
- If applicable, program income
- Summary evaluation results

Additionally, on a quarterly basis, an update regarding the TPPs’ fundraising activities is also electronically submitted. The Program Monitoring Specialist issues quarterly monitoring reports after careful analysis of the reported CDBG/ESG activity and the status of the agency as a whole. Any non-compliance-related issues are addressed through Corrective Action Plans.

Twice a year, TPPs electronically submit the following:

- Beautification report (as beautifications projects are completed)
- Proof of property and payroll tax payments

Desk audits are also conducted as needed.

In addition, all TPPs are required to attend quarterly mandatory trainings. The quarterly trainings held via Zoom provide the TPPs with information on policies and procedures and HUD regulations, as well as training in utilizing the online system for reporting and request for funds reimbursements. An agency orientation is provided for all new TPPs and for any other TPP who wants to attend via Zoom to review CDBG/ESG policies and procedures and compliance of HUD regulations.

All CDBG-ESG-funded sub-recipients received the Third-Party Partners manual. This manual provides details on policies and procedures required of CDBG/ESG-funded agencies, and compliance with HUD regulations is currently being updated.

Monitoring is a key tool that the Housing Division uses to evaluate their operating procedures and systems and those of their housing partners. The Housing Compliance Manager, with the support of the Neighborhood Development Specialists (NDSs), monitors housing development projects that are funded by HOME on an annual basis. Two key mechanisms to ensure long-term compliance include the HOME written agreement and restrictive covenants. Both Rental Development and Owner-Occupied Rehabilitation projects are monitored annually during the affordability period.

Owners of rental housing must provide annually to the City of Toledo information on rents and occupancy of HOME-assisted units to demonstrate compliance with 92.252. Subsequently, other HOME requirements that are monitored and that apply throughout the period of affordability for rental properties include:

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

Additionally, ongoing periodic inspections of HOME-assisted rental housing must be performed to determine compliance with the property standards of 92.251 and on-site inspections under 92.251. An onsite inspection must occur at least once every three (3) years throughout the period of affordability. In the interim, owner certifications are documented with the Affidavit of Property Compliance. The property owner certifies via the Affidavit of Property Compliance that each building and all HOME-assisted units in the project are suitable for occupancy and meet all applicable codes and standards.

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

- On an annual basis and for a period of ten (10) years, the homeowner shall provide annual documentation to the Housing Division that they continue to own and reside in the property as their primary residence.
- On or before May 1st of each calendar year, the Owner-Occupant is required to provide annual certification and/or documentation. Annual documentation can consist of a copy of one of the following: a gas bill, an electric bill, or a homeowner's insurance declaration page.
- For each year of continued ownership and use as a primary residence by the beneficiary, the mortgage is forgiven in an amount not to exceed 1/10th of the assistance amount.

- If, prior to the first anniversary of the mortgage note, the housing unit is sold or transferred or the owner-occupant ceases to use the residence as their primary residence, then the principal balance of the note shall be due and payable in full.

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

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

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

The COT adheres to conditions established within its Citizens Participation Plan (CPP) to inform and notify the citizens of their ability to review and comment on all applicable documents as they relate to the CAPER.

For the CAPER, the CPP establishes that a minimum of one public hearing is held, with notices for that public hearing being provided at least fifteen (15) days in advance of the scheduled hearing. The public notice also advises the locations where the DRAFT CAPER is available for review.

The DRAFT CAPER is available for citizen review on the websites of key local service providers, including the COT's website. The DRAFT copy is also available at the main Toledo-Lucas County Public Library and at other branches by request.

The public notice advised residents of their opportunity to provide public input and comment for a period of 15 days. The COT encourages its residents to comment on achievements, or lack thereof, and the manner in which funds are allocated and/or expended, and presents an opportunity for residents to make proposals or pose questions.

For the 2022-2023 DRAFT CAPER, notices were placed in three periodicals: The Blade, The Toledo Journal, and La Prensa. The latter two publications target African-American and Hispanic/Latino audiences, respectively.

In addition to the public notice, a press release was sent to the media, encouraging residents to provide public comments and attend the hearing. The public notice announcing the public hearing was also sent to all Third-Party Partners.

In accordance with federal statute, the COT holds public hearings at a location accessible to all citizens. However, due to the COVID Pandemic and subsequent rise in new COVID cases, and per the CPP, this hearing will be held by virtual public hearing via Zoom. The hearing will be held at 5:30 p.m., toward the end of the workday, for those who work normal business hours. All attendees will be provided an opportunity to ask questions and/or comment during the virtual public hearing.

The timeline for Citizen Comments for the DRAFT CAPER was as follows:

Friday	07/28/2023	Public Notice sent to The Blade, The Toledo Journal and La Prensa
Sunday	08/06/2023	Public Notice published in The Blade
Wednesday	08/02/2023	Public Notice published in the Toledo Journal
Wednesday	08/09/2023	Public Notice published in La Prensa
Friday	08/11/2023	Public Notice posted to the City of Toledo website.
Monday	08/14/2023	Press Release sent to Mayor's office for distribution to the news and social medias. An email was sent to TPPs and other local organizations.
Tuesday	08/29/2023	DRAFT CAPER emailed to designated locations to post to websites.
Wednesday	08/30/2023	15-day comment period begins
Thursday	08/31/2023	Virtual Public Hearing on DRAFT 2022 CAPER at 5:30 p.m. via Zoom
Wednesday	09/13/2023	Public Comment period ends

Copies of the public notice published in the newspapers mentioned above are included in the attachments to this document as well as a summary of the Public Hearing and citizen comments.

CR-45 - CDBG 91.520(c)

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

In PY 2019, PY 2020, PY 2021, and through PY 2022, the Coronavirus and subsequent variants are still having an impact on the COT and its residents. As a result, the COT continues to evaluate its program objectives and activities. The added funding of the CARES Act has been essential in meeting new and challenging needs in the community while the annual CDBG funds provide continued access to services for the most vulnerable residents.

As of PY 2022, the city expended **\$4,697,768** of CDBG-CV and **\$4,741,188** of ESG-CV funding. However, many partners that have activities relating to COVID are experiencing difficulty completing their activities on time. The city of Toledo staff is monitoring the COVID activities to ensure that all funds will be expended according to the HUD-required expenditure deadlines.

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

No

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

N/A

CR-50 - HOME 91.520(d)

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

The following housing developments received on-site inspections by the Division of Housing during the 2022 program year:

Aurora Project (Carriage House): units - 1023 & 1025 N. Superior; **Autumn Woods Village:** units - 651 Acton & 745 Acton; **Bridgepoint Senior Village:** units - 2005 Abygail Trail #4, #6, #9, #10 & #11; **Brookview Gardens:** units - 1051 Brookview, 1119 Hiltop, 5736 Staghorn; **Cherry Legacy 1:** units - 102 W. Delaware & 3008 Fulton; **Chestnut Hill - 1127 Champlain St.:** units - #104, #207, & #314; **Collingwood Green Phase I - 800 Division Units:** #208, #310, #417, & #418; **Collingwood Green Phase II:** units - 3445 Belmont, 802 Rogan, 734 Division; **Collingwood Green Phase III:** units - 722 Division, 732 Rogan, 362 Addie Way, 360 Bresnahan's Green, 352 Addie Way, & 731 Clemente Trace; **Commons at Garden Lake - 1065 Garden Lake:** units - #109, #117, #202, & #313; **Covenant House:** 702 N. Erie units - #1-211, #1-603, #1-710, & #1-413; **Garden Views Acres:** unit - 1113 Rockcrest; **Legacy Hills - 4454 Hill Ave.:** units - #CG13, #C102, #C106, & #C206; **Madonna Homes - 722 N. Huron:** units - #237, #109, & #427; **Mercy Outreach Ministries IV:** 1149 Shadow Lane units - #1-1C & #1-1D, 6325 Nebraska units - #2-2C & #2-2D; **Oakwood Homes IV:** units - 544 Fernwood, 1311 Palmwood, 1625 Norwood, 1307 Palmwood & 1265 Palmwood; **Ottawa River Estates:** units - 2006 Abygail #A, 2042 Abygail #B, 4638 Davids Creek #B, 4656 Davids Creek #A; **Ottawa River Estates - scattered sites:** units - 2938 Lincolnshire #A & #B, 3128 Lincolnshire #C; **Palmer Gardens:** units - 2804 Wayman Palmer #7-039, 2807 Wayman Palmer #9-052, 2711 Wayman Palmer #13-076, 2723 Wayman Palmer #12-067, #12-070, 2708 Wayman Palmer #01-002; **Parqwood Apts.:** 2125 Parkwood units - #237, #315, #346; **Pilgrim Port - 4545 Angola Rd.:** units - #8, #25, #42, & #50; **REACH:** units - 1645 Eleanor, 5615 Parkstone B, & 201 E. Northgate A; **Renaissance Senior Apts. - 419 N. St. Clair St.:** units - #201, #306, #401, #413, & #415; **ROOST 1:** units - 1623 Copley, 4325 Holly Hill A & D; **ROOST 2:** units - 5107 Adella & 2653 Nash; **SouthEast Toledo Homes I (SETH I):** units - 573 Viking, 1128 Ironwood, 317 Dearborn, 515 South; **SouthEast Toledo Homes II (SETH II):** units - 210 Sumner, 637 South, 968 Kingston & 1443 Holmes; **St. Hedwig - 244 Bronson:** units - #A-206, #B-100 and #B-2023; **TCDC: Englewood Senior Housing - 2737 Monroe St.:** units - #307, #203, #210, & #301; **Toledo Elderly II:** units - 1136 James Gate & 4811 Townsend Dr.; **United North (CHDO):** unit - 533 Dexter; **United North School Homes I:** units - 918 Baker, 917 Moore, 723 Peck; **United North School Homes II:** units - 901 Bronson, 927 Moore, 926 Peck, 2102 Locust; **Valley Bridge Senior Housing - 5351 Nebraska Ave.:** units - #107, #118, & #323; **West Central Homes 1:** units - 635 Palmwood & 2318 Auburn; **Woodside Village Apts.:** 1045 Brookview units - #6, #8 & #12; **YWCA:** 1018 Jefferson units - #3K, #1K, #4K & #503. All units passed inspection.

The following housing developments received an Affidavit of Property Compliance during the 2022 PY:

New Town Apartments: units - 665 Dorr, 709 Dorr, 739 Dorr, 847 Dorr, 895 Dorr and 1143 Dorr; **Oakwood Homes II:** units - 1817 Lawrence & 1423 Foster.

The following units still need to be inspected - owners to receive certified letters:

Adam's Street II (Uptown Arts): units - 328 N. 14th, 3-103, 3-202, 336 W. 14th, 4-204, 332 14th, 1-207; **New Cheney Flats:** 10 Southard units - #203 and #307, 14 Southard unit - #303, 18 Southard unit - #301.

The COT conducts onsite inspections at least once every three years during the period of affordability (CFR 92.504 (c)(6)(d)(iii).) HOME property standards also apply to the common areas and the building exterior.

Inspections Chart

# of Units	# of Failed Units	Next Inspection	Ongoing
1 - 4	1 - 4	Bi-annual	Every two years (revert to 3 years after 1 consecutive passing inspection)
5 - 25	1 - 4	Annual	Every two years (revert to 3 years after 1 consecutive passing inspection)
5 - 25	5	Annual	Annually (revert to every 3 years after two consecutive passing inspections)
26+	1 - 4	Annual	Annually (revert to every 3 years after two consecutive passing inspections)
26+	5+	Annual	Annually (revert to every 3 years after three consecutive passing inspections)

Inspections Chart - HOME

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

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

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

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

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

- Prior to sales/rental activity, the partner or subrecipient shall identify and target individuals, organizations or agencies within the community that are involved with serving low income persons who benefit from special outreach efforts;
- The Equal Housing Opportunity logo will be included in all public advertisements for rental units advertised during the period of affordability;
- Utilization of media sources that advertise to a particular audience (e.g., newspapers that serve protected classes);
- All partners and/or subrecipients must display the HUD fair housing poster in an area accessible to the public;
- All partners (or authorized agent) must collect information on the race and ethnicity of each program applicant (demonstration of results to be made available upon request); and
- All partners (or authorized agents) of rental projects must maintain information demonstrating compliance with the above five bullets throughout the period of affordability, making such information available to COT housing staff during onsite inspections.

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

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

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

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

The Division of Housing drew down **\$48,229.25** in HOME Program Income (PI) for the period July 1, 2022 through June 30, 2023. The PI drawn supported four (4) projects under the HOME At Last - Down Payment Assistance Program (DPA) and one (1) Special Project for Permanent Supportive Housing (PSH).

Down Payment Assistance is offered to first-time home buyers whose income falls below the 80% AMI threshold and participants are eligible for up to \$7,500 towards the purchase of a home in Toledo, Ohio. Additionally, if the home is in a designated target neighborhood the participant can be eligible for up to \$9,500 of assistance. The four (4) homeowners assisted with PI demographic breakdown is as follows:

DPA #1

- 6 - person household
- White
- Non-Latino
- Single Parent
- Income 30+ to 50% AMI

DPA #2

- 6 - person household
- White
- Non-Latino
- Single Parent
- Income 50+ to 60% AMI

DPA #3

- 3 - person household
- Black/African American
- Non-Latino
- Single Parent
- Income 50+ to 60% AMI

DPA #4

- 1 - person household
- Black/African American
- Non-Latino
- Single, Non-Elderly
- Income 60+ to 80% AMI

The Division of Housing drew down **\$15,332.55** in HOME PI for the Warren Commons Rental Housing Development Project. This PSH project will serve chronically homeless men and women who have a history of substance abuse, mental health issues, and involvement in the criminal justice system. The five (5) HOME-assisted units are set at or below 50% AMI. The project is currently under construction, so there are no demographics to report at this time.

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

At the completion of construction of the projects selected in the PY 2021 NOFA, the City's affordable housing stock will increase by approximately 600 units. In PY 2022, DHCD continued to work with projects selected in the PY 2021 NOFA to move them to permitting and finance closing. Toledo City Council approved \$10,000,000 of ARPA gap financing for the Glen and Grand Family Housing, Collingwood Green V Senior Housing, and the YWCA Non-congregate shelter projects, for a total of 167 units. These three ARPA-subsidized projects include 4% LIHTC in their respective capital stacks. It is anticipated that these three projects will close by June 2024.

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

CR-58 – Section 3

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

The tables below represent **Preliminary Data** in the 2022 (48th) PY. The final data will be included in the final version of this CAPER.

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

Table 14 - Total Labor Hours

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

Table 15 - Qualitative Efforts - Number of Activities by Program

Narrative

The city is finalizing its policies and procedures to incorporate the new changes in the reporting requirements. In addition, the City is also looking to utilize a system that will capture Section 3 information.

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

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

1. Recipient Information—All Recipients Complete

Basic Grant Information

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

ESG Contact Name

Prefix	Ms
First Name	Bonita
Middle Name	D
Last Name	Bonds
Suffix	
Title	Commissioner

ESG Contact Address

Street Address 1	One Government Center
Street Address 2	Suite 1800
City	Toledo
State	OH
ZIP Code	-
Phone Number	4192451401
Extension	
Fax Number	
Email Address	bonita.bonds@toledo.oh.gov

ESG Secondary Contact

Prefix	Mrs
First Name	Monica
Last Name	Brown
Suffix	
Title	Community Planning and Development Grants Manager
Phone Number	4192451617
Extension	
Email Address	monica.brown@toledo.oh.gov

2. Reporting Period—All Recipients Complete

Program Year Start Date	07/01/2022
Program Year End Date	06/30/2023

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

Subrecipient or Contractor Name: Beach House Family Shelter, Inc

City: Toledo

State: OH

Zip Code: 43604, 5360

DUNS Number: 167489699

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 213,555

Subrecipient or Contractor Name: Toledo Community Service Center

City: Toledo

State: OH

Zip Code: 43604, 8005

DUNS Number: 151420122

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 120,000

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

City: Toledo

State: OH

Zip Code: 43604, 5443

DUNS Number: 155295272

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 100,000

Subrecipient or Contractor Name: Toledo Lucas County Homelessness Board

City: Toledo

State: OH

Zip Code: 43604, 7258

DUNS Number: 941590114

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 89,259

Subrecipient or Contractor Name: UNITED WAY OF GREATER TOLEDO

City: Toledo

State: OH

Zip Code: 43604, 1410

DUNS Number: 020261681

UEI:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 115,500

CR-65 - Persons Assisted

DATA in this section (CR-65) is reported through SAGE and will be included in the attachments of this CAPER.

4. Persons Served

4a. Complete for Homelessness Prevention Activities

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

Table 17 - Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

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

Table 18 - Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

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

Table 19 - Shelter Information

4d. Street Outreach

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

Table 20 - Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

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

*Table 21 - Household Information for Persons Served with ESG***5. Gender - Complete for All Activities**

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

*Table 22 - Gender Information***6. Age - Complete for All Activities**

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

*Table 23 - Age Information***7. Special Populations Served—Complete for All Activities****Number of Persons in Households**

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

Table 24 - Special Population Served

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

DATA in this section (CR-70) is reported through SAGE and will be included in the attachments of this CAPER.

10. Shelter Utilization

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

Table 25 – Shelter Capacity

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

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

CR-75 – Expenditures

DATA in this section (CR-75) is reported through SAGE and will be included in the attachments of this CAPER.

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Prevention under Emergency Shelter Grants Program			
Subtotal Homelessness Prevention			

Table 26 - ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Assistance under Emergency Shelter Grants Program			
Subtotal Rapid Re-Housing			

Table 27 - ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Essential Services			
Operations			
Renovation			
Major Rehab			
Conversion			
Subtotal			

Table 28 - ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Street Outreach			
HMIS			
Administration			

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

Total ESG Funds Expended	2019	2020	2021

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

	2019	2020	2021
Other Non-ESG HUD Funds			
Other Federal Funds			
State Government			
Local Government			
Private Funds			
Other			
Fees			
Program Income			
Total Match Amount			

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

Total Amount of Funds Expended on ESG Activities	2019	2020	2021

Table 32 - Total Amount of Funds Expended on ESG Activities



Citizen Participation

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Toledo, Ohio 43614
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Thursday, August 31, 2023, 5:30 p.m., by Virtual Hearing

Please click the link below to join the public hearing:

<https://toledo-oh-gov.zoom.us/j/83038069809>

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Brown, Monica

From: Brown, Monica
Sent: Friday, August 11, 2023 8:50 AM
To: abdul.hamadeh@unitedwaytoledo.org; annebauman@compassionhealthtoledo.org; AnnEbbert@cherrystreetmission.org; anneruch@gmail.com; antduran8213@gmail.com; areid@ctwtoledo.org; ArringtL@co.lucas.oh.us; believecenter@gmail.com; brendah_etsac@yahoo.com; carol.gray@toledogrows.org; cbishop@tlchb.org; chuckp@auroraprojectinc.org; cjamato@gmail.com; ctsegaye@nhainc.org; dalexander@familyhousetoledo.org; dcalhoun@lucasmha.org; DeniseF@auroraprojectinc.org; dgray@nwtoledo.org; dhawkins@toledofhc.org; dliedel@theartscommission.org; EAST TOLEDO FAMILY CENTER; emcpartland@mvhabitat.org; eod.sqacc@gmail.com; es_maverick@hotmail.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; jacksonv@co.lucas.oh.us; janellematson@compassionhealthtoledo.org; janeltate@gmail.com; jb_sqacc@yahoo.com; jblack@pathwaytoledo.org; jcintronvega@lucasmha.org; jhabib@spcc-toledo.org; jirwin@spcc-toledo.org; jjacobs@lfhtoledo.org; jjarrett@theartscommission.org; jmueller@pathwaytoledo.org; jodig@etfc.org; Jones, Shannon; jtodd-warfield@lucasmha.org; kachinger@mvhabitat.org; kbond@lucasmha.org; kclark@pathwaytoledo.org; kjennings@ablelaw.org; lbanks@lfhtoledo.org; LEGAL AID OF WESTERN OHIO, INC.; lschoen@lucasmha.org; lweller@lawolaw.org; mary.paxton@jumpstartinc.org; matt.morris@unitedwaytoledo.org; mburda@lfhtoledo.org; mebadik1956@gmail.com; mfolk@theartscommission.org; mgcuccia@tlchb.org; mhart@tlchb.org; mhoffman@nhainc.org; michaelj@auroraprojectinc.org; mike.andersonhsi@gmail.com; mindy@seagatefoodbank.org; mjacomet@nwtoledo.org; MLK KITCHEN FOR THE POOR, INC; mlk.kitchen@att.net; mmcintyre@mvhabitat.org; msachs@nwtoledo.org; msutter@lucasmha.org; nancy.elzinga@gmail.com; NEIGHBORHOOD HEALTH ASSOCIATION, IN; pageelaine1@aol.com; ray.leach@jumpstartinc.org; rgagnon@lucasmha.org; rjordan@pathwaytoledo.org; roy.hodge@jumpstartinc.org; rpetroff@lfhtoledo.org; rstone@ablelaw.org; ryan.bunch@unitedwaytoledo.org; scrabtree@ablelaw.org; sdouglas@nhainc.org; spiller@cherrystreetmission.org; sstewart@gcctoledo.org; stokest@co.lucas.oh.us; tbouyack@nhainc.org; TOLEDO SEAGATE; tpence@familyhousetoledo.org; tpence@lawolaw.org; trish@seagatefoodbank.org; vhill@lucasmha.org; vmartinez@lawolaw.org; vriccardi7@aol.com; Welch,David; wendy.pesttrue@unitedwaytoledo.org; NEIGHBORWORKS TOLEDO REGION; yvonne.dubielak@toledogrows.org
Cc: Bonds, Bonita; Harris, Morlon; Williams, Darlene; Thorpe, Susan
Subject: 2022*2023 CAPER Public Hearing
Attachments: 2022-2023 CAPER Public Notice-FINAL.doc
Importance: High

Good Morning,

The City of Toledo, Department of Housing and Community Development has scheduled a public hearing on the Draft 2022-2023 Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER includes the undertakings, activities, and accomplishments completed during

the 2022-2023 Program Year and provides an assessment of the federally funded programs administered by the Department of Housing and Community Development.

You are invited to attend the public hearing on the Draft 2022-2023 CAPER.

The public hearing is scheduled as follows:

Thursday, August 31, 2023, 5:30 p.m., by Virtual Hearing

Please click the link below to join the public hearing:

<https://toledo-oh-gov.zoom.us/j/83038069809>

Passcode: 036306

Or One tap mobile:

+1408-961-3927,,83038069809#,,, *036306# US

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1 855-758-1310 US Toll Free

Webinar ID: 830 3806 9809

Passcode: 036306

International numbers available: <https://toledo-oh-gov.zoom.us/j/83038069809>

Please see the attached public notice for further details.

Monica Brown

Community Planning and Development Grants Manager
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
CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
for
2022 Program Year – July 1, 2022 to June 30, 2023**

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

The Draft CAPER will be available for review beginning **Wednesday, August 30, 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>

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

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

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

Clerk of Council
One Government Center, 21st Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/government/city-council/>

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

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

A Public Hearing on the CAPER is scheduled as follows:

Thursday, August 31, 2023, 5:30 p.m., by Virtual Hearing

Please click the link below to join the public hearing:

<https://toledo-oh-gov.zoom.us/j/83038069809>

Passcode: 036306

Or One tap mobile:

+1408-961-3927,,83038069809#,,, *036306# US

1855-758-1310,,83038069809#,,, *036306# US Toll Free

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+1 408-961-3927 US

1 855-758-1310 US Toll Free

Webinar ID: 830 3806 9809

Passcode: 036306

International numbers available: <https://toledo-oh-gov.zoom.us/j/83038069809>

The City of Toledo will also receive comments from the public in writing beginning **Wednesday, August 30, 2023**, through **Wednesday, September 13, 2023**, at the following address:

CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2022-2023 CAPER
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: City of Toledo Housing and Community Development Consolidated Annual Performance and Evaluation Report



Friday, August 11, 2023

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

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Downtown Toledo, Jackson & Erie Streets

toledo.oh.gov/housing

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424 Jackson Street

Toledo, Ohio 43604

lucasmha.org

Office of the Mayor Toledo

One Government Center, 22nd Floor

Downtown Toledo, Jackson & Erie Streets

toledo.oh.gov/mayor

Lucas County Homelessness Board

1220 Madison Avenue

Toledo, Ohio 43604

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One Government Center, 21st Floor

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326 N. Erie Street

Toledo, Ohio 43604

toledofhc.org

Lucas Co. Board of Developmental Disabilities

1154 Larc Lane

Toledo, Ohio 43614

lucasdd.info

A Public Hearing on the CAPER is scheduled as follows: **Thursday, August 31, 2023, 5:30 p.m.**, by Virtual Hearing

Zoom link: <https://toledo-oh-gov.zoom.us/j/83038069809>

Passcode: 036306

Or One tap mobile:

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1855-758-1310,,83038069809#,,,,*036306# US Toll Free

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1 855-758-1310 US Toll Free

Webinar ID: 830 3806 9809

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International numbers available: <https://toledo-oh-gov.zoom.us/j/kjRNRmTw7>

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City of Toledo
Department of Housing and Community Development
2022-2023 Caper

One Government Center, Suite 1800
Toledo, Ohio 43604

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TARTA 

One Government Center
640 Jackson Street, Toledo, OH 43604



OPEN DATA

PRIVACY AND SECURITY **BRAND GUIDE**

Request a service 

Brown, Monica

From: Thorpe, Susan
Sent: Monday, August 14, 2023 9:33 AM
To: abdul.hamadeh@unitedwaytoledo.org; afitzgerald@ablelaw.org; annebauman@compassionhealthtoledo.org; AnnEbbert@cherrystreetmission.org; anneruch@gmail.com; antduran8213@gmail.com; areid@ctwtoledo.org; ArringtL@co.lucas.oh.us; believecenter@gmail.com; brendah_etsac@yahoo.com; carol.gray@toledogrows.org; cbishop@tlchb.org; chuckp@auroraprojectinc.org; cjamato@gmail.com; ctsegaye@nhainc.org; dalexander@familyhousetoledo.org; dcalhoun@lucasmha.org; DeniseF@auroraprojectinc.org; dgray@nwtoledo.org; dhawkins@toledofhc.org; dliedel@theartscommission.org; EAST TOLEDO FAMILY CENTER; emcpartland@mvhabitat.org; eod.sqacc@gmail.com; es_maverick@hotmail.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; jacksonv@co.lucas.oh.us; janellematson@compassionhealthtoledo.org; janeltate@gmail.com; jb_sqacc@yahoo.com; jblack@pathwaytoledo.org; jcintronvega@lucasmha.org; jhabib@spcc-toledo.org; jirwin@spcc-toledo.org; jjacobs@lfhtoledo.org; jjarrett@theartscommission.org; jmueller@pathwaytoledo.org; jodig@etfc.org; Jones, Shannon; jtodd-warfield@lucasmha.org; kachinger@mvhabitat.org; kbond@lucasmha.org; kclark@pathwaytoledo.org; kjennings@ablelaw.org; lbanks@lfhtoledo.org; LEGAL AID OF WESTERN OHIO, INC.; lschoen@lucasmha.org; lweller@lawolaw.org; mary.paxton@jumpstartinc.org; matt.morris@unitedwaytoledo.org; mburda@lfhtoledo.org; mebadik1956@gmail.com; mfolk@theartscommission.org; mgcuccia@tlchb.org; mhart@tlchb.org; mhoffman@nhainc.org; michaelj@auroraprojectinc.org; mike.andersonhsi@gmail.com; mindy@seagatefoodbank.org; mjacomet@nwtoledo.org; MLK KITCHEN FOR THE POOR, INC.; mlk.kitchen@att.net; mmcintyre@mvhabitat.org; msachs@nwtoledo.org; msutter@lucasmha.org; nancy.elzinga@gmail.com; NEIGHBORHOOD HEALTH ASSOCIATION, IN; pageelaine1@aol.com; ray.leach@jumpstartinc.org; rgagnon@lucasmha.org; rjordan@pathwaytoledo.org; roy.hodge@jumpstartinc.org; rpetroff@lfhtoledo.org; rstone@ablelaw.org; ryan.bunch@unitedwaytoledo.org; scrabtree@ablelaw.org; sdouglas@nhainc.org; spiller@cherrystreetmission.org; sstewart@gcctoledo.org; stokest@co.lucas.oh.us; tbouyack@nhainc.org; TOLEDO SEAGATE; tpence@familyhousetoledo.org; tpence@lawolaw.org; trish@seagatefoodbank.org; vhill@lucasmha.org; vmartinez@lawolaw.org; vriccardi7@aol.com; Welch,David; wendy.pesttrue@unitedwaytoledo.org; NEIGHBORWORKS TOLEDO REGION; yvonne.dubielak@toledogrows.org
Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Williams, Darlene
Subject: FW: Media Alert - Department of Housing and Community Development to Report Accomplishments; Encourages Public Comments
Attachments: Media Advisory Public Notice- City of Toledo Housing and Community Development Consolidated Annual Performance and Evaluation Report.pdf

Good morning,

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, August 14, 2023 9:28 AM
Subject: Media Alert - Department of Housing and Community Development to Report Accomplishments; Encourages Public Comments

MEDIA ADVISORY

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

TOLEDO, OH – Toledo, OH (August 14, 2023) - The city of Toledo's (COT) Department of Housing and Community Development is seeking comments on its **DRAFT** Consolidated Annual Performance and Evaluation Report (CAPER). Citizens are invited to participate in a virtual Public Hearing and learn more about how the City utilized federal dollars for the benefit of low- and moderate-income residents during the Program Year 2022 (ending on June 30, 2023). A summary of the 2022 **DRAFT** CAPER will be presented at the following hearing:

Thursday, August 31, 2023

5:30 p.m. by Virtual Hearing

<https://toledo-oh-gov.zoom.us/j/83038069809>

Passcode: 036306

Comments on the 2022 **DRAFT** CAPER are welcome at the Public Hearing. The city of Toledo will accept written comments from the public beginning **Wednesday, August 30, 2023** through **Wednesday, September 13, 2023** by submittal to: City of Toledo, Department of Housing and Community Development, 2022-2023 CAPER, One Government Center, Suite 1800, Toledo, Ohio 43604 or by email to: monica.brown@toledo.oh.gov

The **DRAFT** CAPER will be available for review beginning **Wednesday, August 30, 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
lucasmha.org

Office of the Mayor Toledo
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toledo.oh.gov/mayor

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Toledo, Ohio 43604
endinghomelessness.toledo.org

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Downtown Toledo, Jackson & Erie Streets
toledo.oh.gov/city-council

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325 Michigan Street
Toledo, Ohio 43604
toledolibrary.org

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

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

The 2022 DRAFT CAPER presentation will provide an assessment of the federally funded programs monitored by the COT's Department of Housing and Community Development:

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

The Department of Housing and Community Development continues to work closely with the Toledo Lucas County Homelessness Board to assist in the goal of eliminating and reducing homelessness and with The Fair

Housing Center to affirmatively further fair housing in Toledo. At the Public Hearing, more information will be provided related to the progress achieved in these areas.

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 <https://toledo.oh.gov/accessibility/ada-accommodation>.

###



Amy Voigt

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

Marketing and Communications

One Government Center
Suite 2200
Toledo, Ohio 43604

toledo.oh.gov



August 14, 2023

MEDIA ADVISORY

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

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Passcode: 036306

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Amy Voigt

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

Marketing and Communications

One Government Center
Suite 2200
Toledo, Ohio 43604

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The **DRAFT** CAPER will be available for review beginning **Wednesday, August 30, 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
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325 Michigan Street
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The Fair Housing Center
326 N. Erie Street
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toledofhc.org



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One Government Center

Suite 2200

Toledo, Ohio 43604

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###



Fair Housing Report

Fair Housing Action Plan: July 2022 through June 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.

¹ *Id.*

Fair Housing Issue: Criminal History Screening

Goal: Ban the box policy

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

Discussion:

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

No updates this reporting period.

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

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

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

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

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

No updates this reporting period.

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

No further updates at this time.

Fair Housing Issue: Criminal History Screening

Goal: Set aside affordable housing opportunities

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

Discussion:

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

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

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

Update from LMH:

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

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

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

- No further updates at this time.

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.

Reporting period: January 2023 through June 2023

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Homeownership: Lending and Insurance

Goal: Address insurance discrimination issues

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

Discussion:

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

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

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

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

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

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

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

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

Discussion:

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

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

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

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

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

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

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Accessibility for persons with disabilities

Goal: Enforce current visitability and accessibility rules

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

Discussion:

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

Update from TFHC:

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

Update from The Ability Center:

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

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

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

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

Update from The Ability Center:

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

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

Update from TFHC:

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Accessibility for persons with disabilities

Goal: Encourage developers to increase accessibility

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

Discussion:

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

Update from TFHC:

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

Update from The Ability Center:

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

to offer an accessible/ visitable plan to potential customers.

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

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

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

Update from The Ability Center:

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

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

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

Update from TFHC:

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Source of income discrimination and voucher mobility

Goal: Enact local source of income discrimination protections

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

Discussion:

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

An ordinance prohibiting discrimination based on source of income—initially introduced to Toledo City Council in 2018 but not acted upon—was reintroduced in the fall of 2020. The legislation updates the City of Toledo's already existing anti-discrimination ordinance to include source of income as an additional protected class, effectively requiring housing providers to accept all legal, reliable sources of income including

disability and military benefits, Social Security, and Housing Choice Vouchers (HCV). Public hearings were held by City Council, including a Neighborhoods Committee meeting and a Committee of the Whole meeting, which featured presentations from several community partners and allowed for public input. The legislation received support from organizations including TFHC, LMH, The Ability Center, ABLE, TLCHB, MHR SB, UPSE, and United Way of Greater Toledo. Many landlords and property owners expressed opposition to the ordinance, citing a reluctance to accept vouchers and participate in the HCV program. Legislation passed in December 2020 and goes into effect 120 days after passage. Partners including TFHC and LMH are developing an educational campaign to inform housing providers about the ordinance, in an effort to address FAQs, help housing providers become more familiar with the HCV program, and encourage compliance. Plans include distributing informational documents and hosting an online training session.

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

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

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

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

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Source of income discrimination and voucher mobility

Goal: Increase voucher mobility

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

Discussion:

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

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

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

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

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

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

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

Goal: Enforce Fair Housing protections

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

Discussion:

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

TFHC Enforcement Summary:

- Total new cases: 26

By protected class:

17 Disability
4 National Origin
2 Race
3 Sex

By issue:

2 Harassment
21 Rental
2 Sales
1 Zoning

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

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

TFHC Enforcement Summary:

- Total new cases: 65

By protected class:

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

By issue:

64 Rental
1 Sales

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

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

- Total new cases: 57

By protected class:

39 Disability
0 National Origin
13 Race
5 Sex

By issue:

0 Harassment
56 Rental
1 Sales
0 Zoning

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

Reporting Period: December 2021 through January 2023

Total number of intakes: 2847

Total new fair housing cases opened: 165

By protected class:

107	Disability
4	National Origin
28	Race
7	Sex

By issue:

0	Harassment
133	Rental
4	Sales
1	Zoning

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

Reporting Period: January 2023 through May 2023:

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

Total number of intakes: 672

Total new fair housing cases opened: 36

By protected class:

28	Disability
0	National Origin
5	Race
2	Sex

By issue:

1	HOA
35	Rental
4	Sales

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

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
 - Impressions realized: 3,489,762
- Distribution of fair housing brochures and educational materials: 17,522
- Trainings conducted: 15
 - Persons trained: 208

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

TFHC Education and Outreach Summary:

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

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

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 3,723,108
- Distribution of fair housing brochures and educational materials: 15,124
- Trainings conducted: 21
 - Persons trained: 383

Reporting Period: December 2021 through January 2023

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

January – March 2022 & April – June 2022

TFHC Education and Outreach Summary:

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

July - September 2022 & October - December 2022

TFHC Education and Outreach Summary:

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

Reporting period: January 2023 through May 2023:

January – May 2023

TFHC Education and Outreach Summary:

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

Fair Housing Issue: Voucher Mobility

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

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

Discussion:

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

No updates this reporting period.

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

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

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

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Land Use and Zoning

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

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

Discussion:

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

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

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

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

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

In October 2021, Toledo City Council approved Warren Commons, a proposed 46-unit permanent supportive housing project to provide safe, stable housing options for individuals who are experiencing homelessness, returning from incarceration, in recovery, or diagnosed with mental health conditions. The project will support residents by connecting them to local services and resources including education, employment, and health care. The \$11 million development is a partnership of TASC of Northwest Ohio and Community Housing Network. The project received competitive low-income housing tax credits from the Ohio Housing Finance Agency to help fund its construction. Tenants will receive housing-choice vouchers through Lucas Metropolitan Housing to cover their rent. The proposal received support from many local organizations including TFHC, MHR SB, and TLCHB but many neighbors expressed opposition.

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: LGBTQIA+

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

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

Discussion:

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

No updates this reporting period.

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

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

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

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Homelessness and Affordable Housing

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

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

Discussion:

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

No updates this reporting period.

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

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- City of Toledo is supporting and funding a collaborative effort between Toledo Public Schools, Toledo Lucas County Homelessness Board, and Lutheran Social Services to provide rental assistance and supportive services for 12 months to 75 TPS families at risk or experiencing homelessness.
 - City of Toledo is supporting and partially funding the development and implementation of TLCHB's Housing Problem Solving Pilot Program, which is a person-centered approach that will enhance the Continuum of Care's prevention, diversion, and rapid resolution activities.
 - No Barriers Housing initiative is currently working with Continuum of Care providers to implement the HUD Housing First Standards Assessment Tool, which will allow for monitoring to ensure system-wide fidelity to housing first principles.
 - TLCHB has established a Landlord Risk Mitigation Fund to support the No Barriers Housing initiative through landlord engagement and incentives.

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

No updates this reporting period.

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Housing Conditions

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

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

Discussion:

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

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

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

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

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

grant program.

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

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

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

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

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

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Public Transportation

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

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

Discussion:

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

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

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

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

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

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

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

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Impediments in Rental Housing

Goal: Address the eviction crisis in Toledo

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

Discussion:

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

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

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

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

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

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

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

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

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

Fair Housing Issue: Impediments in Rental Housing

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

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

Discussion:

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

Update from TFHC:

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

Update from The Ability Center:

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

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

Update from TFHC:

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

Update from The Ability Center:

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

-
- 5/2021: OSILC Housing Workgroup meeting
 - 5/2021: housing accessibility review
 - Ramps built:
 - 15 – grants & waiver
 - 9 – temp ramp program
 - 2 – hospice

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

Update from TFHC:

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

Update from The Ability Center:

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

Reporting period: December 2021 through January 2023

- As with previous reporting periods and as demonstrated in the statistics provided above, disability continues to be the most common type of case that The Fair Housing Center handles. This includes, primarily, reasonable accommodations cases.
- The Ability Center continues to provide its ramp program and its advocacy for persons with disabilities as described above.

Reporting period: January 2023 through June 2023

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

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 begin work. The committee also drafted an ordinance to establish a debt forgiveness program that would enable residents to eliminate past due balances and avoid water shutoffs. The ordinance is currently under review by the City's law dept.
- City Council passed an ordinance in June 2020 to help protect tenants from water shut offs that occur when owners do not pay the water bill or request termination of water services. The new ordinance, drafted by TFHC, enables tenants to pay the water bill to avoid disconnection and gives them the right to deduct these costs from future rent payments. Further, it prohibits the Department of Public Utilities from terminating water service to occupied rental properties, which prevents owners from shutting off utilities as a form of "self-help eviction" to force tenants to leave. Water is essential for a home to be safe, healthy, and habitable, and this legislation will ensure tenants are not denied the right to this vital resource.

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

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

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

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

Reporting period: December 2021 through January 2023

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

Reporting period: January 2023 through June 2023

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

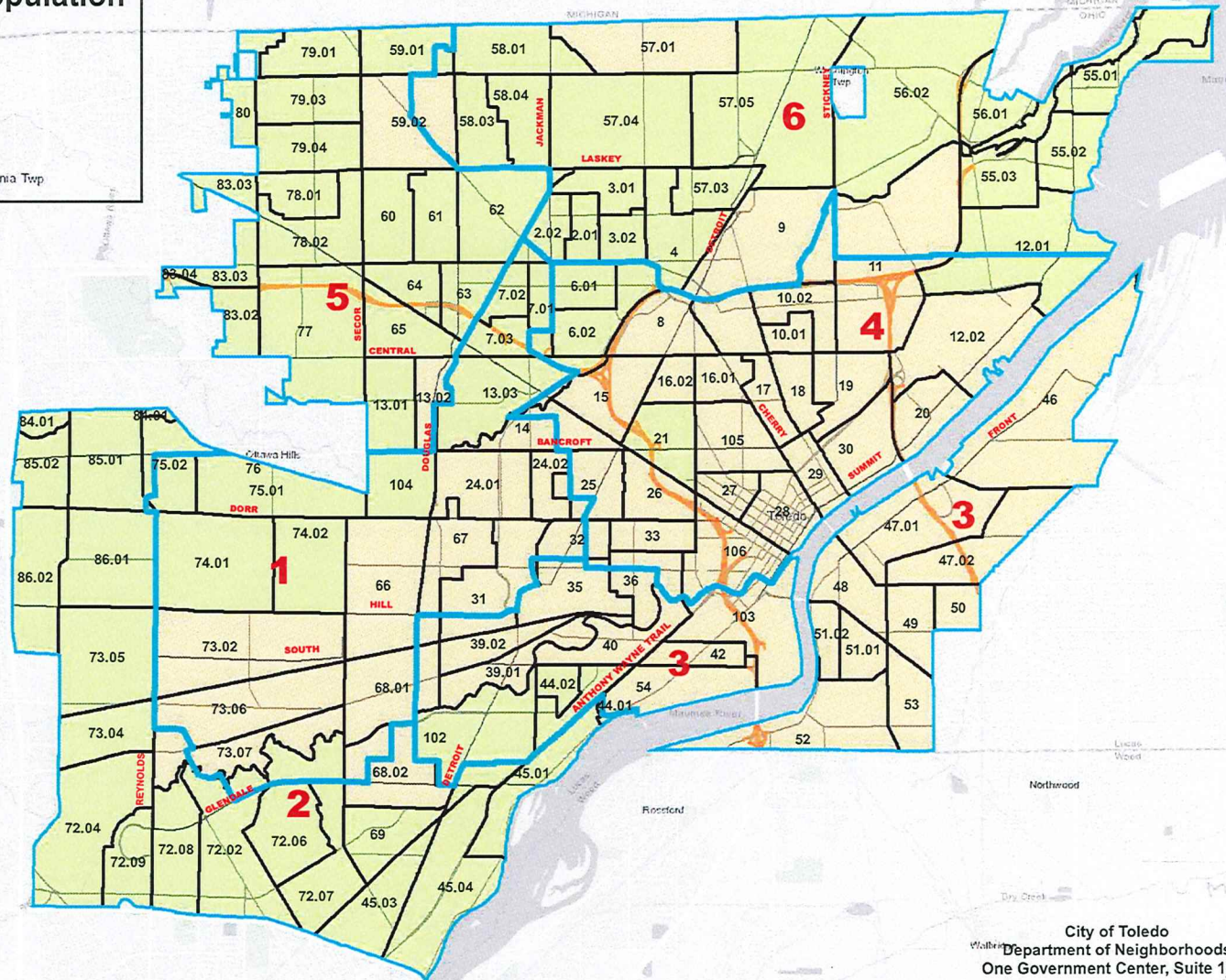


Maps

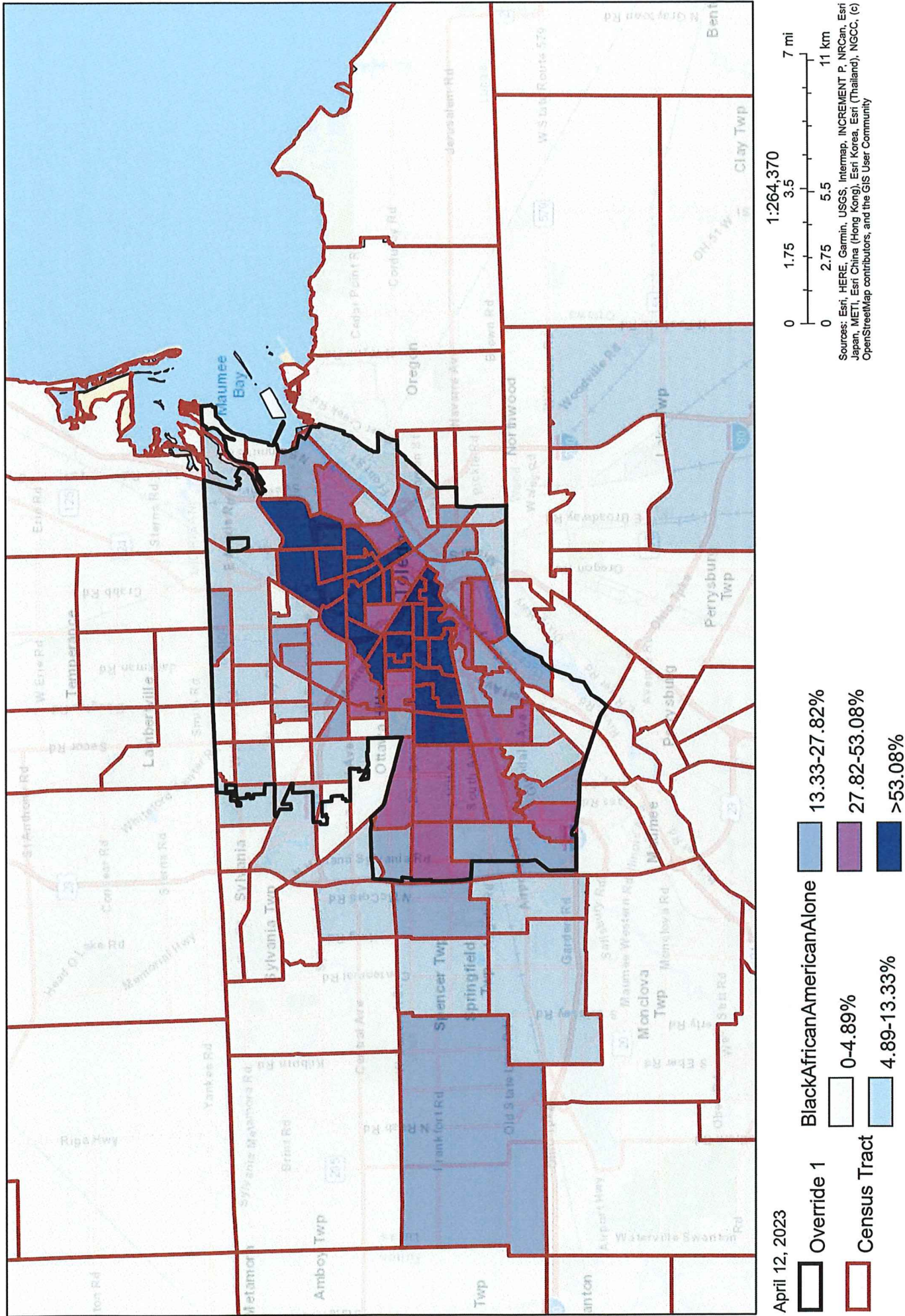
City of Toledo 2022 Low - and - Moderate Income (LMI) Census Tracts

Low - and - Moderate Income by Population

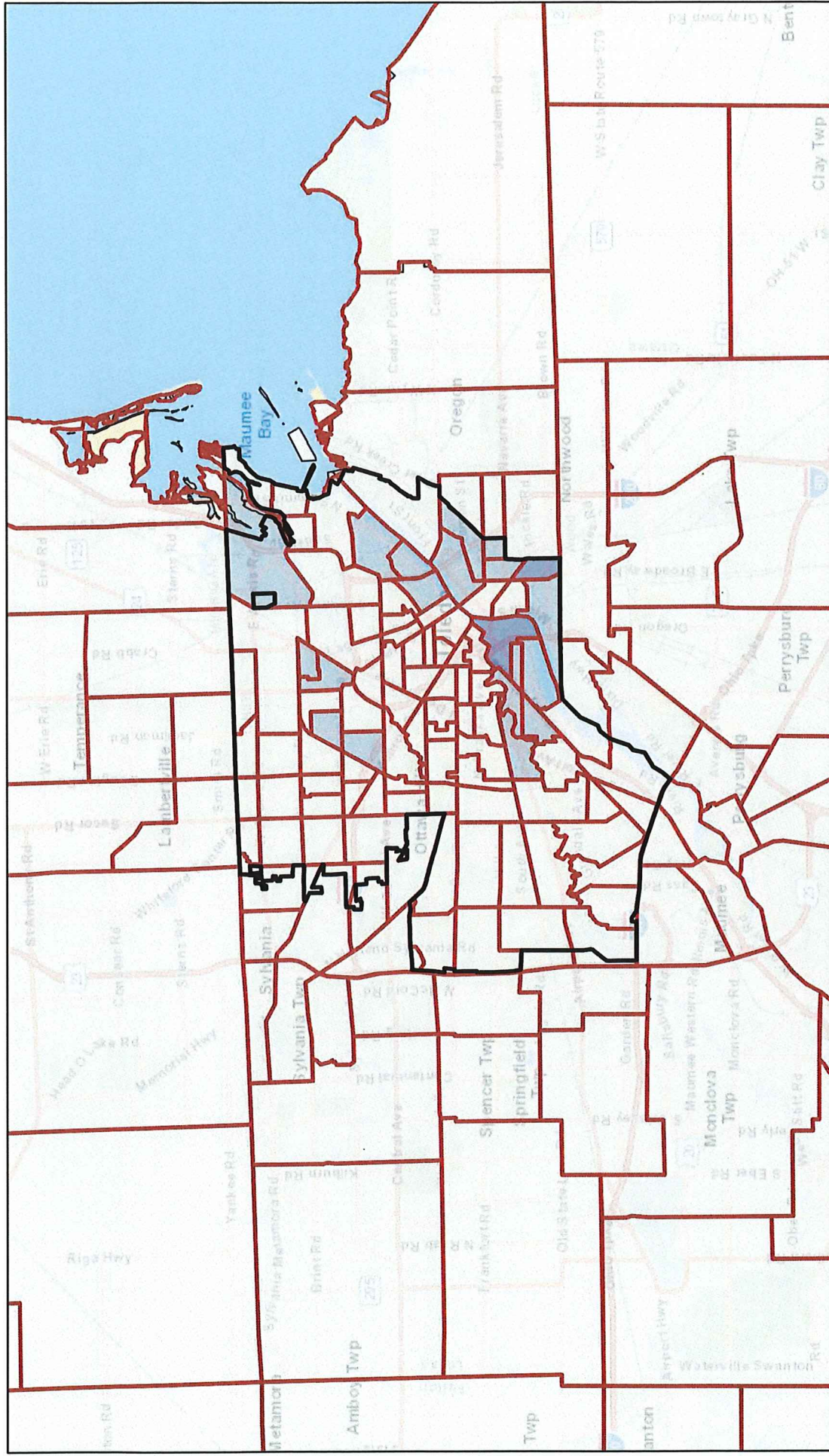
- Council Districts (1-6)
- Tracts 2020
- <51% LMI Population
- >51% LMI Population



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



Hispanic Population in Toledo - Concentration of Minorities Per Census Tract



April 12, 2023

- Override 1
- Census Tract
- Hispanic Origin 0-13.22%
- Hispanic Origin 13.22-28.18%
- Hispanic Origin 28.18-47.80%

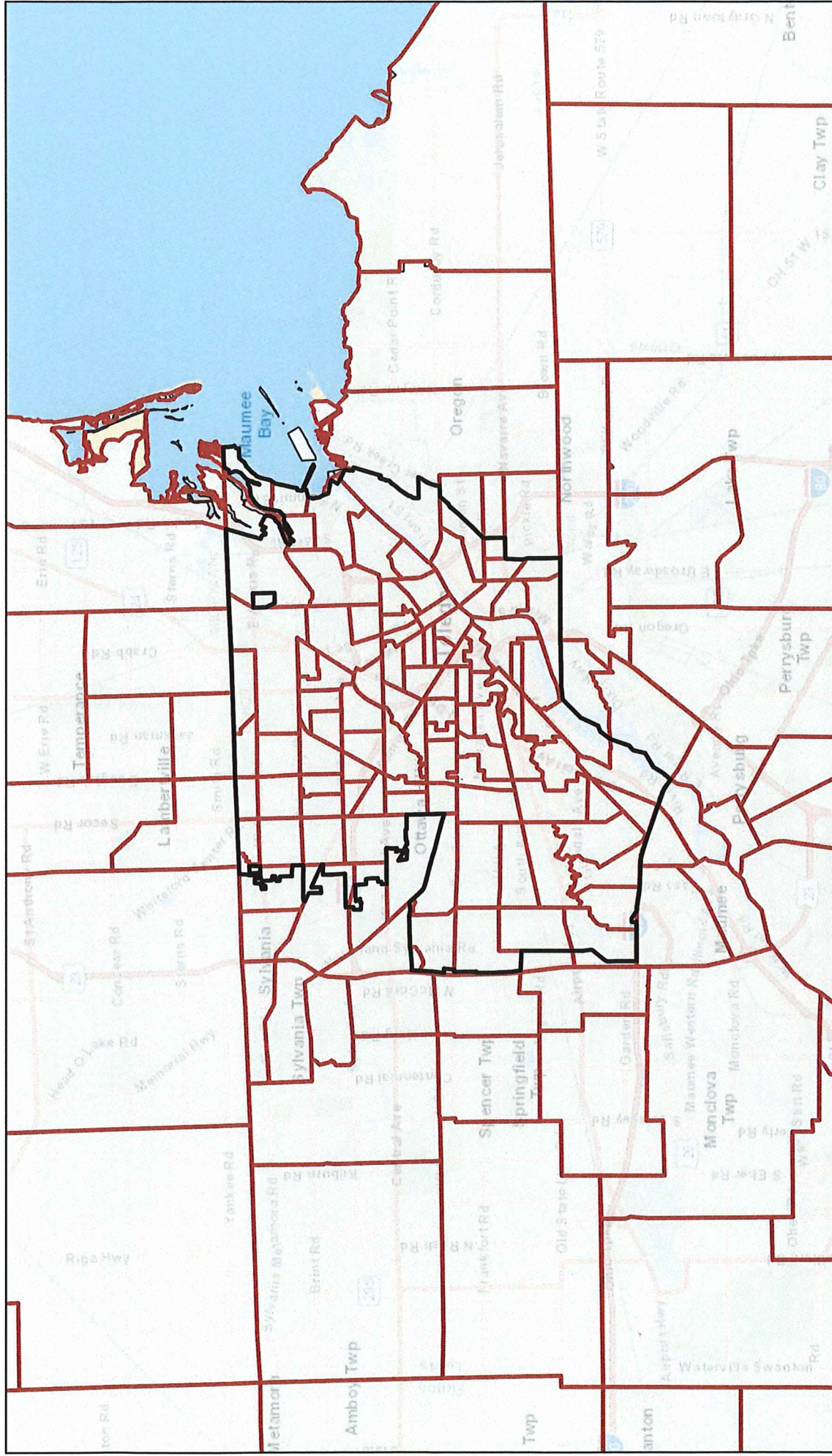
1:264,370

0 1.75 3.5 5.5 7 mi

0 2.75 5.5 11 km

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

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



April 12, 2023

☐ Override 1 NativeHawaiianPacificIslanderAlone

☐ Census Tract 0-2.28%

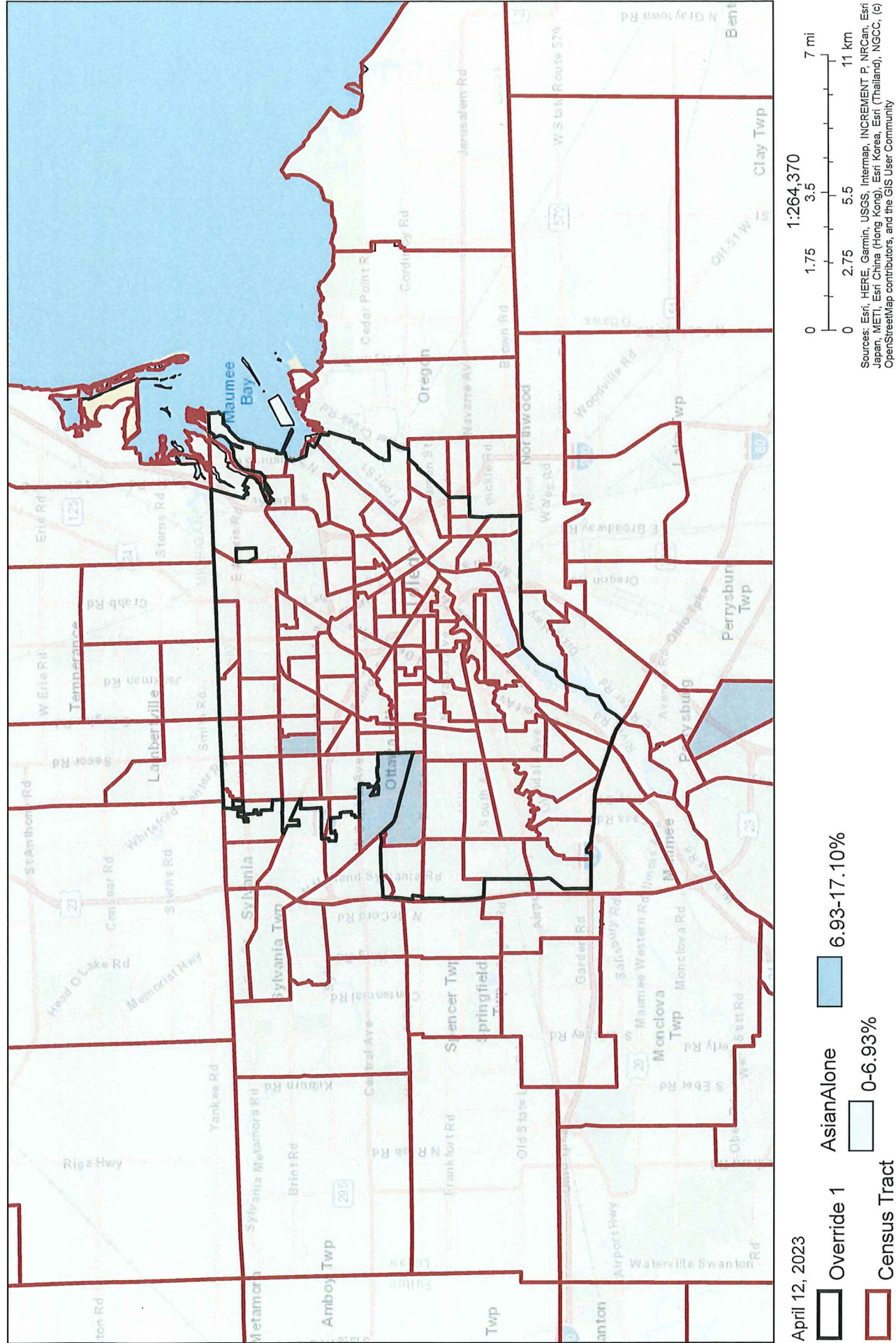
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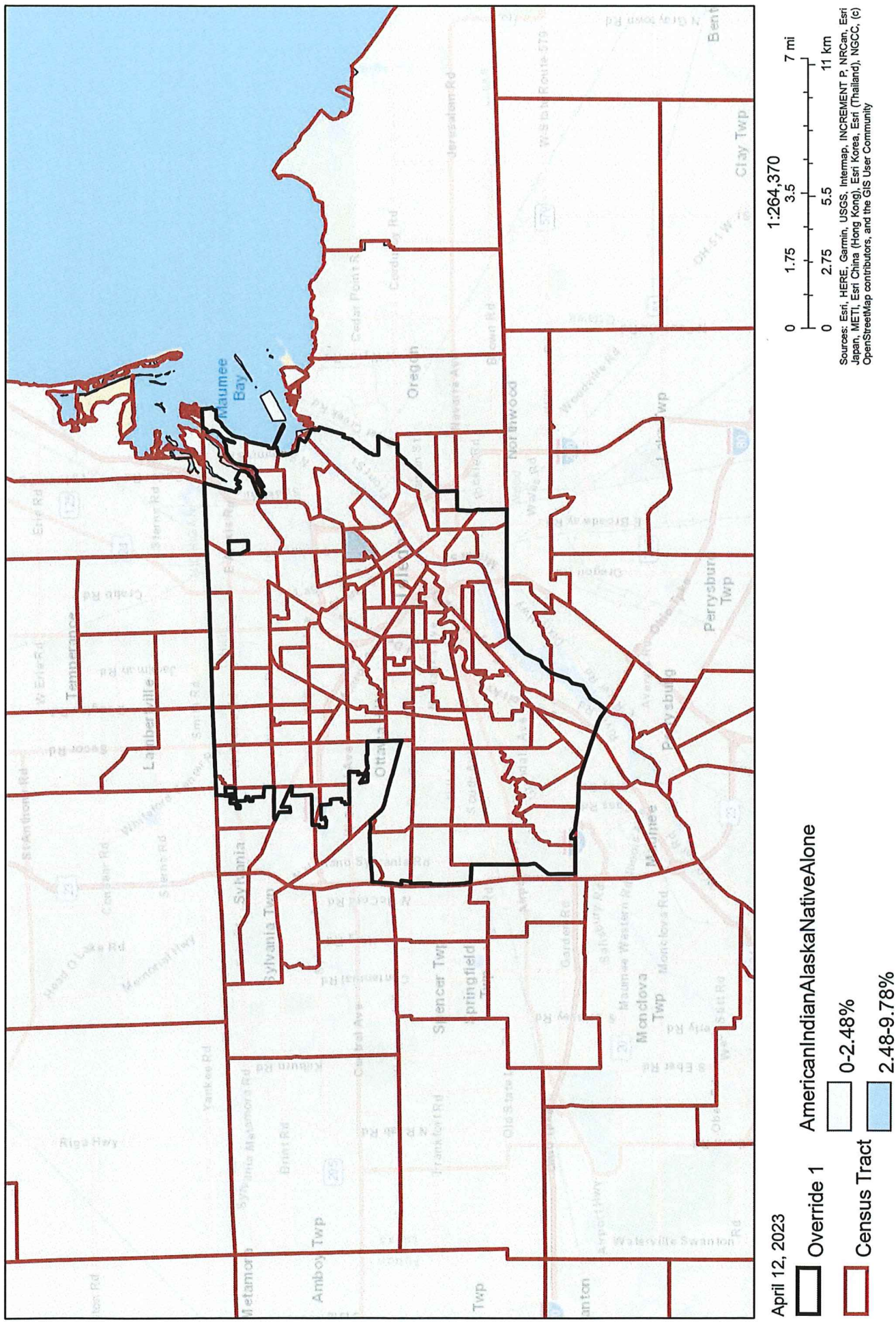
0 2.75 5.5 11 km

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

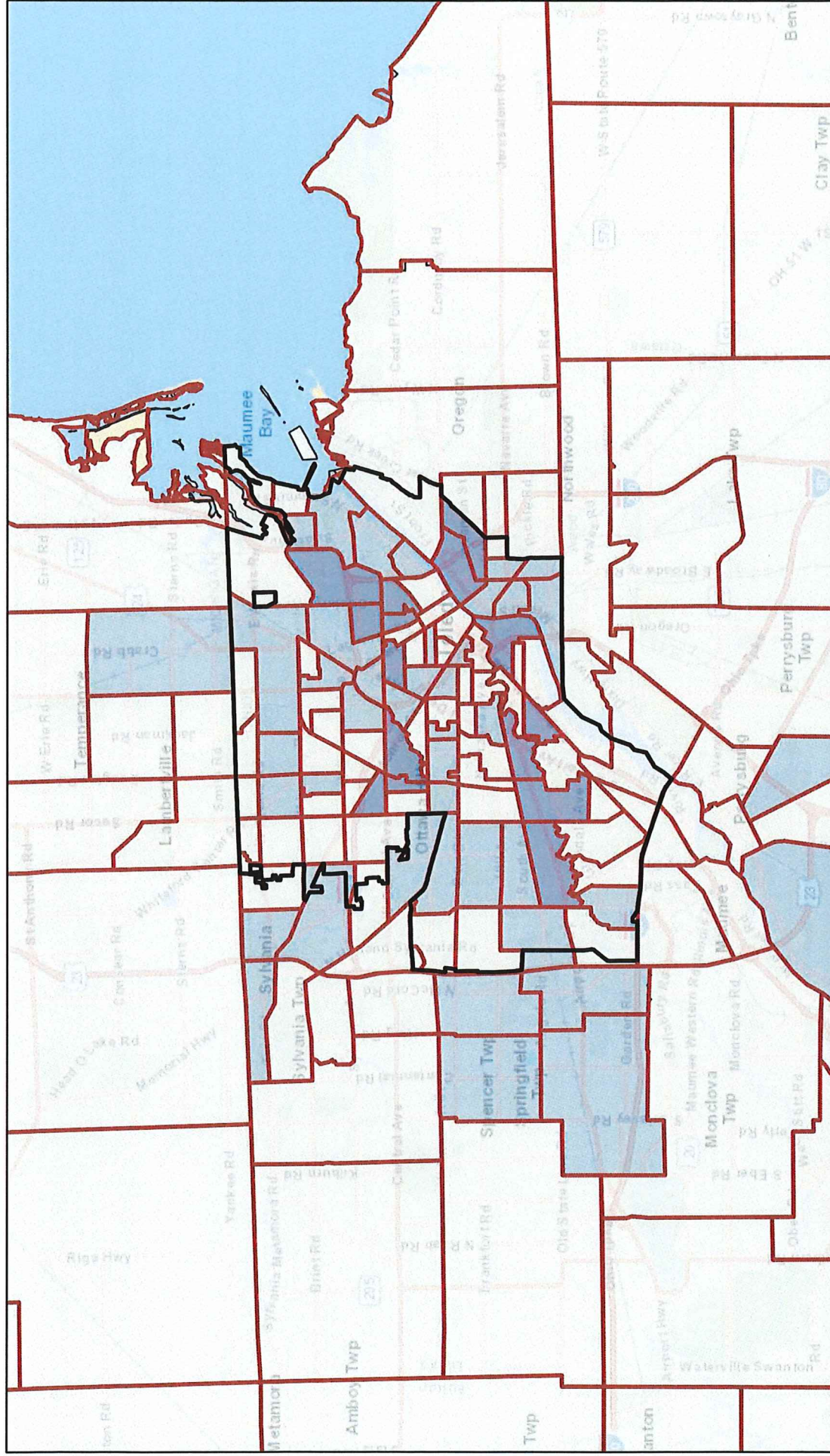
Asian Population in Toledo - Concentration of Minorities Per Census Tract



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



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



April 12, 2023

- Override 1
- Census Tract
- 0-2.64%
- 2.64-5.80%
- 5.80-12.93%

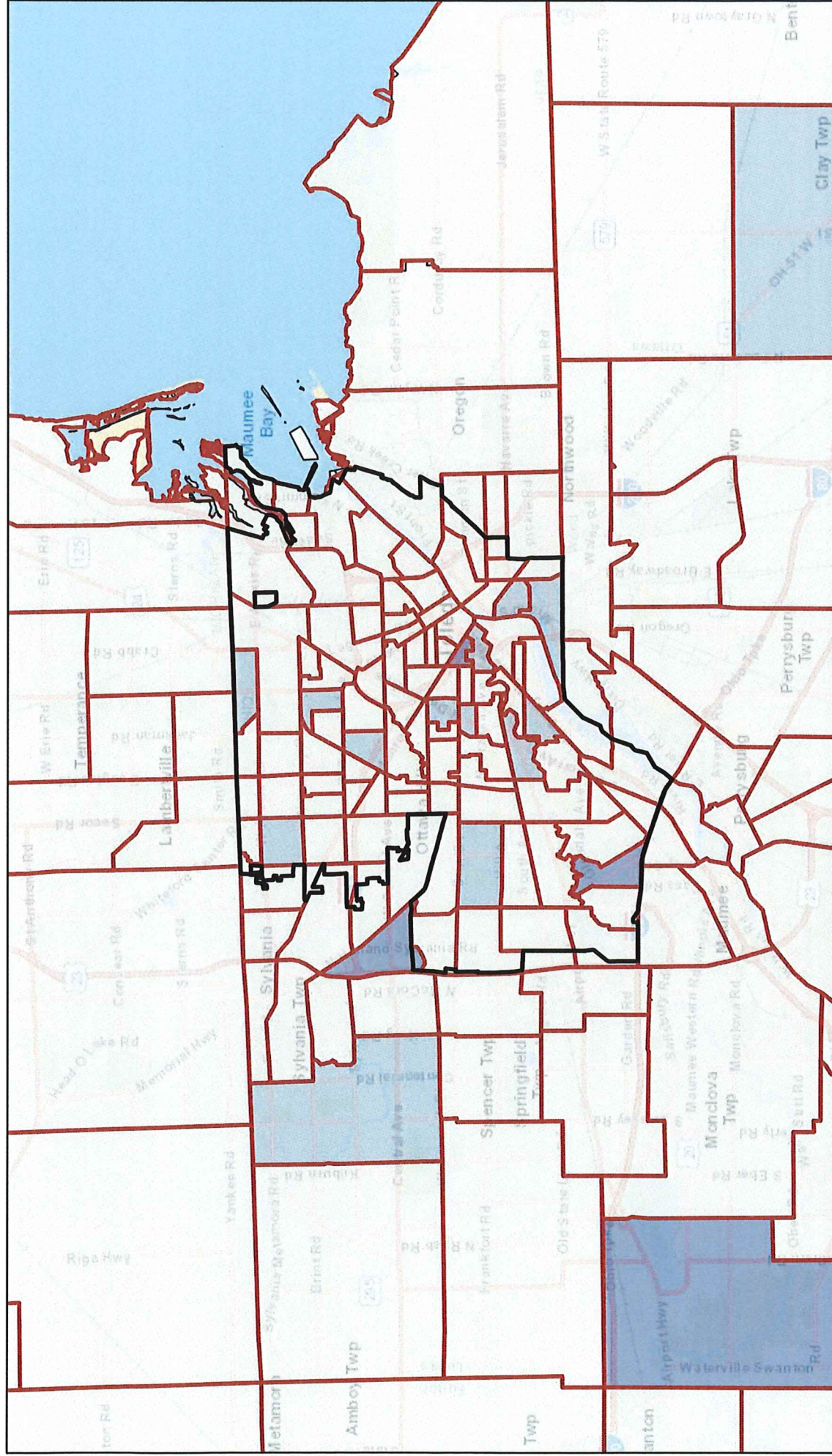
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0 1.75 3.5 7 mi

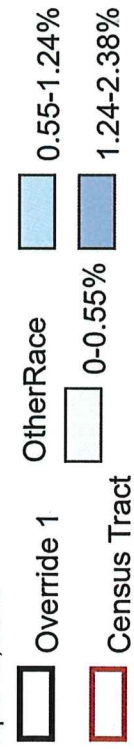
0 2.75 5.5 11 km

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

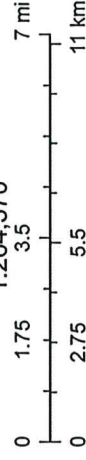
Some Other Race Population in Toledo - Concentration of Minorities Per Census Tract



April 12, 2023



1:264,370



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



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



**Section 3 Report
to be included in
the final version of
this CAPER**



Homelessness Indicator Snapshots

SNAPSHOT METRICS 07.01.2022 to 06.30 2023

Metric	Emergency Shelter	Transitional Housing	Rapid Re-Housing	Permanent Supportive Housing
# Households Served	1,033 total 846 Leavers	35 total 22 leavers	16 total 9 leavers	67 total 9 leavers
Exits to Permanent Housing	298 – 35.22%	11 – 31.42%	3 – 33.33%	9 – 100%
Adults Employed at Exit	89 – 10.52%	0	1 – 11.11%	1 – 11.11%
Exits with Non-Cash Benefits	266 – 31.44%	11 – 31.42%	3 – 3.33%	2 – 22.22%
Length of Stay	92 Days – Stay 153 Days – Leavers	90 – Stay 85 – Leavers	185 – Stay 135 – Leavers	1961 – stay 2738 – leavers
Increased Income at Exit	487 – 57.65%	13 – 37.14%	6 – 66.66%	3 – 33.33%



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