



2026-2027 Action Plan

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Executive Summary

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

1. Introduction

The City of Toledo (COT), a designated entitlement city and participating jurisdiction, receives an annual allocation of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funds from the United States Department of Housing and Urban Development (HUD). These federal resources are intended to assist low- and moderate-income persons and households by supporting programs and activities that provide decent, safe, and sanitary housing that is both affordable and sustainable, while also expanding economic opportunities and strengthening communities.

The 2026 (52nd) Program Year (PY), which begins on July 1, 2026, represents the second year of the City of Toledo's 2025–2029 Five-Year Consolidated Plan. The 2026 (52nd) PY Annual Action Plan serves as a one-year strategic plan that identifies the proposed use of HUD entitlement funds and outlines the activities the City intends to undertake during the program year. Once received, these allocations will support and leverage additional public and private resources within the City of Toledo to further community development efforts.

The activities funded through this Annual Action Plan are designed to advance the priority needs and strategic goals identified in the City's 2025–2029 Five-Year Consolidated Plan. These priorities were established through a comprehensive planning process that included analysis of local housing and community development data, citizen participation, stakeholder engagement, and consultation with community-based organizations and service providers.

The funding amounts for the 2026 (52nd) program year are shown below. To match actual allocation amounts, all proposed activity budgets were proportionally increased or decreased from the estimated funding levels.

- Community Development Block Grant (CDBG): **\$7,026,026.00**
- HOME Investment Partnerships Program (HOME): **\$1,971,471.86**
- Emergency Solutions Grant (ESG): **\$619,354.00**

Program Income

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

The estimated program income is listed below:

- CDBG Program Income (Estimated Amount): **\$900.00**
- HOME Program Income: **\$559,876.30**
- NSP1, 2 and 3 Program Income: **\$0.00**

CDBG, HOME, and ESG are annual federal allocations. PI from CDBG, HOME, and NSP are annual projections. The allocations are available to be utilized toward meeting HUD's National Objective.

Carryover Funds

The amounts of carryover funds entering the second year of the Five-Year Consolidated Plan are subject to final reconciliation of accounts and the processing of outstanding expenditures to determine accurate balances. Therefore, the amounts listed below may be adjusted accordingly.

- CDBG Carryover: **\$985,000.00**
- HOME Carryover: **\$5,759,943.00**
- ESG Carryover: **\$0.00**

The City of Toledo (COT), in adherence to HUD regulations, will allocate at least seventy percent (70%) of its CDBG entitlement funds to activities that directly benefit low- and moderate-income (LMI) persons, including individuals with disabilities and other eligible residents of the City. In addition, the COT will reserve no less than fifteen percent (15%) of its HOME allocation for Community Housing Development Organizations (CHDOs) that are certified and recognized by the Department of Housing and Community Development (DHCD).

To support the goals and priorities outlined in the 2025–2029 Five-Year Consolidated Plan, the COT will allocate funds toward both operational and programmatic activities in the following areas:

- Planning and Administration (Operational/Program) – CDBG, HOME, and ESG
- Housing and Neighborhood Revitalization (Operational/Program) – CDBG, HOME, and NSP
- Economic Development (Operational/Program) – CDBG
- Fair Housing Services (Operational/Support) – CDBG
- Non-Housing Community Development Needs (Program/Activity) – CDBG
- Homelessness (Operational/Program) – ESG
- Lead Hazard Control (Operational/Program) – LEAD

2. Summarize the objectives and outcomes identified in the Plan

The goals and priorities identified in the City of Toledo’s 2025-2029 Five-Year Consolidated Plan were developed through community input gathered during the citizen participation process. These priorities focus on improving housing conditions, supporting neighborhood revitalization, strengthening community development efforts, and expanding economic opportunities for residents.

To achieve these goals, the City will work collaboratively with non-profit organizations, for-profit businesses, other City departments, and local and regional partners committed to improving the lives of Toledo residents and neighborhoods. A key focus will be on increasing access to safe, decent, and affordable housing. In addition, public service activities that address basic community needs will be implemented through DHCD's third-party partners or other non-profit organizations. Consistent with HUD regulations at 24 CFR Part 5, the majority of individuals benefitting from the programs and services will be low- to moderate-income residents.

Through the 2025-2029 Five-Year Consolidated Plan, the COT established local priorities that align with HUD's National Objectives. The City will continue to focus on initiatives and activities that address two of the three HUD National Objectives:

- Benefit to low- and moderate-income (LMI) persons
- Aid in the prevention or elimination of slum and blight.

A summary of the goals and objectives for Program Year (PY) 2026 (52nd) is provided in section AP-20 Annual Goals and Objectives of the Annual Action Plan. Each goal aligns with HUD's established objectives and outcomes framework. All current and future activities supported through the Five-Year Consolidated Plan and the Annual Action Plan will contribute to at least one HUD Objective and one measurable outcome.

HUD Objectives:

- **Suitable Living Environment** – promote healthy communities by improving the well-being of low- to moderate-income residents through programs and services that address basic needs and support progress toward self-sufficiency.
- **Decent Housing** - ensure access to safe, healthy, and affordable housing for low- to moderate-income households.
- **Economic Opportunity** – expand economic opportunities and support job creation within the community.

HUD Outcomes:

Outcomes measure how funded activities or programs will benefit a community or the resident served. The City will use the following outcomes to evaluate the impact of activities through this plan:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

In addition, the goals and actions outlined in this plan will support the City's commitment to Affirmatively Furthering Fair Housing (AFFH). These efforts will be guided by the recommendations identified in the Fair Housing Center (TFHC) City of Toledo Analysis of Impediments to Fair Housing Choice for the period July 1, 2025 - June 30, 2030.

3. Evaluation of past performance

As a CDBG entitlement city and a HOME participating jurisdiction, Toledo receives direct HUD funding for the following federal programs:

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

Each year, the City evaluates the progress of projects outlined in its Annual Action Plan through the Consolidated Annual Performance and Evaluation Report (CAPER), which is available on the city's website. The CAPER summarizes the accomplishments and progress toward the Consolidated Plan goals for each year.

Toledo effectively administers its HUD-funded programs, achieving its annual outcomes consistently. The 2025 Program Year (July 1, 2025 – June 30, 2026) marked Year 1 of the City's 2025-2029 Five-Year Consolidated Plan. Projects funded aligned with priority goals focused on neighborhood revitalization, economic growth, and community development, despite ongoing pandemic-related challenges.

CARES Act Response and COVID-19 Recovery

Toledo received \$5.98M in CDBG-CV and \$4.88M in ESG-CV funds to prevent, prepare for, and respond to COVID-19. The ESG-CV funds have been fully expended, while \$4.89M of CDBG-CV has been spent.

Key accomplishments include:

Using CDBG-CV Funds:

- **274** businesses assisted
- **595** households received emergency rental aid
- **11,596** people received COVID testing
- **5,570** individuals received supplies/cleaning support
- **35,515** people supported with food security
- **1,575** people assisted (**13** youth, **1,482** seniors, **80** homeless)
- **91** people supported with legal/eviction aid
- **62** households received mortgage assistance

Using ESG-CV Funds:

- **406** households received emergency rental assistance
- **62** households received emergency mortgage assistance
- **587** people benefitted from laundry equipment access
- **365** people received street outreach
- **35,238** people served via the CoC Collaborative
- A partnership with Toledo Public Schools, TLCHB, and Lutheran Social Services helped stabilize housing for **217** families of TPS students.

Homeownership Assistance Program (HOA)

Through HOME funds, **58** first-time homebuyers received assistance and completed HUD-certified homeownership training. DHCD and partners also continued efforts in housing rehabilitation, lead hazard control, and homelessness prevention.

Community Gardens & Neighborhood Improvement

Programs supporting community gardens reached **3,704** individuals, helping reduce blight, increase food access, and promote neighborhood engagement.

Fair Housing

Toledo supports the Fair Housing Center, which received over **2,000** intakes, investigated more than **125**

cases, and impacted over **8,000** individuals through its efforts. The Center also delivered over **25** outreach and training sessions, with funding from both HUD and the City's CDBG allocation.

Neighborhood Revitalization Strategy Areas (NRSAs)

In February 2023, the U.S. Department of Housing and Urban Development (HUD) approved the Old South End and Englewood Neighborhood Revitalization Strategy Areas (NRSAs) for the City of Toledo Department of Housing and Community Development (DHCD). For Program Year 2024, HUD further approved the Junction Choice Neighborhood Plan, establishing Junction as the City's third NRSA. In addition, DHCD designated three neighborhoods in East Toledo - Garfield, Raymer, and Starr as target areas for concentrated investment. The following activities and investments represent DHCD and partner agency efforts in the three NRSAs and the East Toledo target areas during the reporting period.

Reporting period - July 1, 2024-June 30, 2025:

Home At Last (HAL) Down Payment Assistance (DPA)

- Junction - **\$15,000** provided to **2** households.
 - Old South End - **\$9,336.41** provided to **1** household.
- Total Investment - **\$38,336.41** in HAL assistance across all NRSAs and East Toledo target areas.

Roof Replacement Program

- Englewood - 1 completion; **\$18,705** (CDBG).
 - Junction - 1 completion; **\$21,273** (ARPA).
 - East Toledo Target Areas - 2 completions; total **\$33,342** (CDBG: **\$20,852**/ARPA: **\$12,490**).
- Additional Partner Work: Maumee Valley Habitat for Humanity completed rooftop improvements totaling:
- **\$91,070.96** in Englewood, East Toledo, and the greater Toledo area.
 - **\$55,325.98** in Junction and Old South End.

Lead Paint Abatement

- Total DHCD Investment: **\$238,120.46**
- Englewood - 2 households completed (**\$58,836.98**) and 5 scheduled.
 - Old South End - 1 household scheduled.
 - East Toledo - 10 households completed (**\$179,283.48**) and 22 scheduled.

Demolition & Tree Planting

- Englewood - **6** demolitions; **156** trees planted.
- Junction - **121** demolitions; no trees planted.
- Old South End - **36** demolitions; no trees planted.
- Raymer - **1** demolition; no trees planted.
- Starr - **5** demolitions; no trees planted.

Economic Development - Façade, White Box, and Planning Grants

Total NRSA Investment: **\$248,293**; Starr Target Area Investment: **\$115,000**

Breakdown:

- Old South End - 3 businesses; **\$99,600** (Façade).
- Englewood - 3 businesses; **\$70,000** (Façade, Façade Planning, White Box).
- Junction - 2 businesses; **\$78,693** (Façade, White Box).
- Starr (East Toledo) - 2 businesses; **\$115,000** (Façade, White Box).

Parks & Recreation Investments

Total Current-Year Investment: **\$2,260,299.60** awarded but not yet paid (Englewood & Old South End):
\$844,179.25

Breakdown of current-year projects:

- Junction - **\$271,251** Savage Park revitalization.
- Englewood - **\$1,088,907.75** Robinson Park shelter/athletic field, and Smith Park pool/athletic field upgrades.
- Old South End - **\$520,411.11** for Danny Thomas Park amphitheater & loop trail and Ashley Park playground upgrades.
- East Toledo:
 - o Garfield - **\$19,725.18** for Ravine II Park bleacher upgrades.
 - o Starr - **\$185,841.40** for Prentice Park playground upgrades.
 - o Raymer - **\$174,163.16** for Burnett Park playground upgrades.

Public Service - CDBG-Funded Nonprofit Programs (50th CDBG Year)

Old South End:

- Sofia Quintero Art & Cultural Center (SQACC) - **\$74,761.87** for Community Garden Development Initiative, growing and distributing fresh produce to LMI residents and Toledo Seagate Food Bank.
- The Believe Center - **\$67,123.06** for Keeping Sports/Skills Alive program (academic tutoring & recreational activities for K–12 youth).
- Toledo Seagate Food Bank - **\$55,000** for food baskets to LMI residents and those impacted by opioid dependence.

Englewood:

- Pathway - **\$86,724.37** for Emergency Home Repairs for owner-occupied homes of LMI adults aged 62+.

Junction:

- Martin Luther King Kitchen for the Poor - **\$61,416.63** for supplemental food box program.
- Art Tatum Zone - **\$62,500** for tutoring & summer enrichment programs at Pickett Elementary, Jones Leadership Academy, and Tabernacle Church.
- Lucas Metropolitan Housing - **\$9,651.17** for Financial Opportunity Center services for residents of McClinton Nunn, Port Lawrence, and Collingwood Green housing communities.

The City of Toledo’s evaluation of past performance under the Lead-Safe Ordinance has informed the goals, priorities, and implementation strategies reflected in the current plan. Since the ordinance was adopted and implemented, a total of **5,305** Lead-Safe Certificates have been issued citywide. This cumulative certification data, along with compliance trends observed during phased implementation, has provided valuable insight into landlord participation rates, geographic disparities across Census Tracts, inspection workflow challenges, and the effectiveness of targeted outreach and enforcement efforts.

In September 2025, administrative, application review, enforcement, and quality assurance responsibilities transitioned from the Toledo-Lucas County Health Department to the City of Toledo.

Since that transition, the Department of Housing and Community Development (DHCD) has evaluated compliance patterns within priority Census Tracts particularly those with the highest incidence of lead-poisoned children and assessed the impact of the revised phase-in timeline adopted in April 2025. This evaluation demonstrated measurable progress in expanding the supply of certified lead-safe rental units while also identifying the continued need for focused landlord education, strengthened quality assurance procedures, coordinated data sharing, and sustained enforcement in noncompliant areas.

The lessons learned through ordinance implementation and phased enforcement provide the foundation for the City's current objectives, which emphasize targeted outreach, improved compliance rates, enhanced contractor capacity, and long-term reduction of childhood lead exposure in pre-1978 housing.

The City of Toledo Department of Housing and Community Development's Housing Division (DHCD) administers lead-based paint hazard control programs (LBPHC) and is structured to provide easy access and workflow for housing development activities. As such, the DHCD utilizes in-house staff for day-to-day project delivery of unit activities from enrollment through clearance as well as incorporating relationships with subrecipients and partners for outreach, education, capacity training, lead summit development and referral of residential units with active lead hazard control orders. In addition to interim control and abatement activities, the program also provides technical, financial, and educational support necessary to reduce lead hazards in very low-, low-, and moderate-income households.

Founded on this structure, the DHCD's grant program will provide technical, financial, and educational support necessary to reduce lead hazards to a minimum of **141** low-to-very low-, low-, and moderate-income households over the next four years by targeting a minimum of owner-occupied and rental units with children under the age of six years old. Any pre-1978 residential unit within city limits could be potentially eligible for the program if it meets eligibility requirements. However, targeted marketing and agency engagement will be utilized to generate intakes from the **41** OLHCHH designated high-impact neighborhoods.

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

During the previous 12 months (beginning in 1/1/2025), the DHCD continued to administer two OLHCHH grants along with two remaining dedicated lead-based paint hazard control funding sources. Aggregate results from the dedicated lead-based paint hazard control activities during the period included **16** additional eligible units enrolled, **101** units having received a comprehensive Lead Inspection/Risk Assessment and **101** units achieving lead clearance (**19** owner-occupied and **120** rental). This equates to a total of **\$2,525,359.56** investment into the community, assisting **87** occupied households, **59** children under the age of six in providing a lead-safe environment. Additionally, **123** persons between the ages of

6-17 years of age and **116** 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 50.9% AMI.

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

Strategic Goals and Community Impact

The City has established a \$37 million loan pool for long-term, fixed-rate, affordable financing. Funds will be utilized to close financing gaps, allow borrowers to complete their deals, generate and maintain jobs, increase affordable housing, enhance access to development opportunities, and expand the existing tax base. The City closed on two loans in 2025, each worth \$2 million, for community center improvements and for economic development. A third loan (economic development) will close in spring 2026 for \$616,000.

In 2025, the City of Toledo was one of only 18 communities selected to receive a \$4,000,000 HUD Pathways to Removing Obstacles to Housing (PRO Housing) Grant. The grant supports key initiatives, including a comprehensive zoning code rewrite, the development of pre-approved housing construction templates, and expansion of the Neighborhood Revitalization Strategy Area (NRSA) UPLIFT Initiative. DHCD dedicated \$1,600,000 of the award to expand the UPLIFT Initiative to all three NRSA and committed to creating or preserving 75 housing units during the grant performance period of 2025–2030.

4. Summary of Citizen Participation Process and consultation process

The City of Toledo's Citizen Participation Plan (CPP) outlines the City's approach to citizen engagement and the consultation process. Public participation is essential in the planning process because it allows residents' perspectives to be considered and ensures that community needs are carefully evaluated when making funding and policy decisions.

In preparing the 2026 (52nd) PY Annual Action Plan, the COT collaborated with several non-profit and community organizations, including Lucas Metropolitan Housing (LMH), The Fair Housing Center (TFHC), the Toledo Lucas County Homelessness Board (TLCHB), and other regional and local partners involved in housing, community, and economic development.

Residents were provided reasonable and timely access to meetings, information, and records related to the COT's proposed use of HUD funds. Public comments on the DRAFT Annual Action Plan were accepted during a 30-day public comment period beginning Wednesday, March 25, 2026, and ending Thursday, April 24, 2026.

Two public hearings were held on Thursday, March 26, 2026 and Thursday, April 2, 2026, both beginning at 5:30 p.m. to accommodate residents who may not be available during normal business hours. The public hearings and 30-day comment period were publicized through a public notice, press release, the City's website, and Facebook postings.

The public notice announcing the availability of the DRAFT Annual Action Plan and public comment period was published in The Blade (local circulation), The Sojourner's Truth, and La Prensa (minority publications). The notice was sent to the City's community partners and posted on the Department of Housing and Community Development's website.

To evaluate proposed funding requests, two Citizen Review Committees (CRCs) were established. One committee reviewed applications for non-homeless services submitted by local 501(c)(3) non-profit organizations, government agencies, quasi-governmental agencies, other non-profits, and Community Based Development Organizations (CBDs). The second committee reviewed applications for homeless services. Members of the CRCs represented a broad range of community sectors, including local transportation authority, healthcare, the public library system, and social service organizations.

In addition, the DHCD regularly consults with community leaders, organizations, and residents to strengthen partnerships, improve neighborhood conditions, and address the needs of Toledo residents. A list of agencies and organizations consulted during the development of this plan is provided in Table 2 of the AP-10 Consultation section.

All public hearings are held in facilities that are accessible to persons with disabilities, including wheelchair access and designated handicapped parking. Reasonable accommodations are available upon request for individuals with disabilities, including assistance for participants attending virtual public hearings.

5. Summary of public comments

A total of **15** residents attended the two public hearings (**11** on March 26th and **4** on April 2, 2026). The DRAFT Annual Action Plan was presented by representatives from the Department of Housing and Community Development, with presentations also from Lucas Metropolitan Housing, Toledo Lucas County Homelessness Board, and the Fair Housing Center.

During the 1st public hearing session, residents raised several questions and concerns related to housing development, neighborhood conditions, and program implementation:

- **Affordability of New Housing Developments:**
A resident questioned how certain newly developed housing units marketed as serving households up to 120% of Area Median Income (AMI) are considered “income-driven” when rents (e.g., approximately \$1,300 for a two-bedroom unit) appear inconsistent with affordability. Clarification was requested on how income targeting and rent levels are determined for such developments, particularly when they are not subsidized.
- **Supportive Services for Individuals Transitioning from Homelessness:**
A concern was raised regarding the availability and extent of supportive or “wraparound” services (e.g., case management, life skills coaching) for individuals transitioning from homelessness to permanent housing. The resident emphasized the importance of ongoing support to promote housing stability and property upkeep.
- **Property Maintenance and Landlord Accountability:**
Concerns were expressed about property conditions in rental units occupied by voucher holders, particularly those managed by out-of-state investors. The resident noted instances of poor maintenance and asked how the City ensures accountability and quality housing standards for these properties.
- **Demolition Practices and Long-Term Vacant Land:**
A resident raised concerns about the frequency of residential demolitions in certain neighborhoods (e.g., Old West End), including cases where properties undergoing renovation were demolished. Questions were asked about strategies to reduce demolitions, preserve viable housing stock, and prevent long-term vacancy of cleared parcels.
- **NRSA (Neighborhood Revitalization Strategy Area) Data and Designation Process:**
A resident inquired about the data and criteria used to designate NRSAs, including whether demographic, income, and housing profiles were developed for neighborhoods. They also asked how long NRSA designation lasts and whether areas remain eligible for continued support beyond the initial designation period.

There were no public comments received at the 2nd public hearing. Furthermore, no additional comments were received within the 30-day comment period.

A total of **7** residents provided comments on the Facebook post. The feedback largely centered on concerns about accessibility, transparency, and fairness in the Draft Action Plan. Several commenters noted that the document was too lengthy and not user-friendly, making it difficult for the average resident to engage. There were also concerns about uneven neighborhood investment, with emphasis placed on NRSAs and areas like Vistula, and questions about how other neighborhoods would benefit.

Housing-related comments highlighted a need for more diverse housing options, including single-family homes, and raised concerns that current programs focus too heavily on very low-income households while overlooking middle-income residents. Additional concerns included potential gentrification, lack of clarity around demolition plans and reuse of vacant land, and the need for more detail on funded organizations and program outcomes.

The attachments offer a summary of the public hearings.

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

The City of Toledo accepted all public comments that were received.

7. Summary

Year 2 of the City of Toledo's 2025-2029 Five-Year Consolidated Plan continues the implementation of strategies and priorities identified through the community engagement, stakeholder consultation, Needs Assessment, and Market Analysis completed during the development of the Five-Year Plan. The City will continue utilizing CDBG, HOME, and ESG funds to support housing, neighborhood revitalization, public services, and economic development activities that address identified community needs. During Year 2, the City will build upon existing partnerships and leverage additional funding opportunities to maximize the impact of available federal resources while advancing the goals and objectives established in the Consolidated Plan to improve the quality of life for Toledo residents.

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

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

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

Table 1 – Responsible Agencies

Narrative (optional)

The City of Toledo Department of Housing and Community Development (DHCD) is the lead agency responsible for preparing and implementing the Consolidated Plan. The Department is also responsible for administering the expenditures of federal funds received from the U.S. Department of Housing and Urban Development (HUD) and for the implementation of the priorities and goals identified in this plan.

The City currently receives entitlement Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant (ESG) from HUD. To accomplish the priorities and goals represented in this plan, DHCD partners with non-profit organizations, affordable housing developers, City Departments, and local and regional agencies to improve the neighborhoods and living conditions of Toledo residents.

Consolidated Plan Public Contact Information

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2025 - 2029 Consolidated Plan

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

1. Introduction

The City of Toledo performed extensive outreach to essential stakeholders in the City, County, and State as part of the Consolidated Plan development process. The City made several outreach and engagement efforts and maintained regular communication with citizens, community agencies, and neighborhood groups.

To create the Annual Action Plan, the city collaborated with non-profit organizations such as Lucas Metropolitan Housing (LMH), Toledo Lucas County Homelessness Board (TLCHB), The Fair Housing Center (TFHC), Lucas County Land Reutilization Corporation (Land Bank), and other regional and local housing, community, and economic development organizations. The Citizen Participation Plan (CPP) process, which involves two public hearings, a 30-day comment period, and direct consultations, is utilized to gather feedback.

The COT utilized a Citizen Review Committee (CRC), which is comprised of residents from various community sectors who have broad or specific knowledge of current community activities, understand community issues, and can allocate resources as needed. CRC members evaluated applications, interviewed potential agencies, and made funding recommendations.

The City of Toledo and Lucas County continue to address the digital divide through collaborative efforts to expand access to affordable broadband service, internet-enabled devices, and digital literacy resources. The Greater Toledo Digital Equity Coalition, led by the Toledo-Lucas County Public Library, brings together community partners to improve digital connectivity, enhance technology skills, expand device accessibility, and strengthen community partnerships. A countywide Digital Equity Gap Analysis identified barriers related to broadband affordability, device access, and digital literacy, particularly among low- and moderate-income households.

To support digital inclusion, the Toledo-Lucas County Public Library provides free public computer access, technology assistance, digital literacy resources, and a mobile hotspot lending program. In addition, Buckeye Broadband's Internet Assistance Program offers free or reduced-cost high-speed internet service to eligible households participating in programs such as SNAP, TANF, SSI, Federal Public Housing Assistance, and the Free and Reduced-Price School Lunch Program. Together, these initiatives help residents access education, employment, healthcare, government services, and other essential online resources while increasing participation in the digital economy.

Prior federal programs, such as the Affordable Connectivity Program (ACP), helped eligible households obtain affordable internet service and highlighted the ongoing need for sustainable broadband affordability solutions. The City and its community partners will continue to support efforts that expand broadband access, improve digital literacy, increase access to technology, and promote digital inclusion throughout Toledo and Lucas County.

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

The City of Toledo continues to foster improved collaboration in all housing, health, and connected service efforts, and it actively partners with local organizations to carry out activities that improve quality of life for Toledo residents. The City constantly interacts with other organizations to identify plans and opportunities to improve cooperation and collaboration in service delivery to people. Every year, efforts are made in collaboration with local groups to improve coordination between service and housing agencies, as well as private and public sector agencies, in order to decrease service gaps. They include, but are not limited to the following:

- Toledo/Lucas County Homelessness Board (TLCHB)
- Toledo Lucas County Port Authority
- United Way of Greater Toledo (UWGT)
- Greater Toledo Community Foundation (GTCF)
- University of Toledo
- Lucas Metropolitan Housing (LMH)
- Mental Health and Recovery Services Board of Lucas County (MHRBLC)
- Lucas County Children's Services Board (LCCSB)
- Lucas County Veterans Service Commission
- Lucas County Land Reutilization Program (Land Bank)
- Toledo Public Schools
- Lucas County
- Private Businesses

A continuing commitment to these relationships and collaborations is vital to attaining the community’s goals. For example, the MHRBLC funds several entities that provide treatment and support services for youth and adults in the behavioral health system, thereby helping to alleviate one of the root causes of homelessness. DHCD collaborates with the Lucas County Land Bank to acquire properties for new construction, rehabilitation, and demolition reducing blight and promoting affordable housing development. The City is an important and effective advocate and source of support in moving projects forward that would otherwise not be completed due to lack of resources, as well as supporting community organizations dedicated to improving housing stock, such as LMH, community development corporations and other local nonprofits.

Other partnerships exist between the corporate community, faith-based organizations, public service agencies, housing providers, foundations, and other community organizations that advocate for persons in need. Increased communication with all community stakeholders will lead to more structured connections that support and promote the City of Toledo’s strategies and goals.

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

The City of Toledo has a strong partnership with the Toledo Lucas County Homelessness Board (TLCHB) which is the lead entity in the Home for Everyone Continuum of Care Board (CoC). TLCHB actively participated in the development of the Consolidated Plan through regular communication and discussions, as well as active participation in public meetings and hearings during the planning process. The City works closely with TLCHB to address the needs of those experiencing homelessness or at risk of homelessness through the provision of housing and services under the ESG and CDBG programs.

The TLCHB ensures all components of a successful CoC are in place, including a coordinated intake process, outreach and assessment standards, available supportive services, HMIS data management, emergency shelter, transitional housing, and permanent housing. TLCHB promotes an inclusive and comprehensive planning continuum, including a community wide Congress that promotes and endorses review and input of the community's plan to end homelessness. The TLCHB released its updated Strategic Plan in 2024 that aligns with the Home for Everyone CoC's aim of providing safe, healthy, and affordable housing to all households experiencing homelessness in Toledo and Lucas County, Ohio. The plan outlines a streamlined process for coordinating and managing crisis response resources while accommodating best practices, resource availability, cultural shifts, and economic changes.

The proposed strategy entails a thorough evaluation of the system, to ensure intentional interconnection and responsiveness. It also involves the establishment of oversight mechanisms to verify that the needs of the community are being adequately addressed, the dissemination of information to stakeholders and the general public, improved data access and utilization, and the expansion of housing options that are both appropriate and affordable.

The following goals are embedded in the CoC Strategic Plan and are fully supported by the City of Toledo.

- Increase Affordable and Accessible Housing Options
- Increase Oversight of the Homeless Response System
- Increase Data Access, Quality, and Understanding
- Strategically Transform the Homeless Response Framework
- Increase Awareness and Understanding

Through its collaboration with the Home for Everyone Continuum of Care, the City of Toledo is engaged in open communication with various institutions including health care, foster care, and correctional facilities to assist individuals being discharged from their programs. Additionally, all community institutions have policies stating that individuals are not to be discharged into a homeless situation. The TLCHB informed and educated all community stakeholders on contacting the CoC's Coordinated Access Information and Referral system (housed at United Way 211) if an individual is facing a housing crisis to ensure that people discharged from institutions do not immediately face homelessness.

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

The City of Toledo has a strong partnership with the Toledo Lucas County Homelessness Board (TLCHB) which is the lead entity in the Home for Everyone Continuum of Care Board (CoC). TLCHB actively participated in the development of the Consolidated Plan through regular communication and discussions, as well as active participation in public meetings and hearings during the planning process. The City works closely with TLCHB to address the needs of those experiencing homelessness through the provision of housing and services under the ESG and CDBG programs. The City of Toledo uses data from the HMIS system and the TLCHB's strategic plan to determine ESG Allocations. A Citizen's Review Committee (CRC) reviews applications and scores them based on a rubric designed in partnership with the TLCHB. This process provides flexibility for the community to fund high performing programs that align with the CoCs vision.

The City of Toledo partners with the Toledo Lucas County Homelessness Board (TLCHB) in several ways to address homelessness in the community. Here are some key aspects of the partnership:

- **Funding Opportunities:** The City of Toledo provides federal funding through the Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) programs. These funds are used to support various homelessness services, including emergency shelter, rapid rehousing, and rental assistance. HOME funds are utilized to support affordable housing development that could include permanent supportive housing.
- **No Barriers Housing:** This initiative prioritizes housing as the first step in ending homelessness. The program provides rapid access to housing followed by support services from Toledo area partners. The City of Toledo collaborates with TLCHB to create partnerships throughout the community and support the mission of No Barriers Housing.
- **Community Data Dashboard:** TLCHB maintains a Community Data Dashboard to provide up-to-date homeless data from across the community. This tool helps the City of Toledo and other partners analyze homelessness data to support better targeting ESG funding and other resources more effectively to address homelessness.

These collaborative efforts help create a comprehensive approach to addressing homelessness in the City of Toledo. In addition, TLCHB, as the HMIS Lead agency, works with a subcommittee of the Home For Everyone CoC Board, to update and enforce HMIS policies and procedures for use and security. The Lead Analyst is responsible for up-to-date information regarding HUD requirements and the HMIS Database Administrator is responsible for training homeless service providers and keeping inventory of programs.

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

1	Agency/Group/Organization	Lucas Metropolitan Housing
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lucas Metropolitan Housing (LMH) was consulted to assist in determining housing needs, how LMH serves those in public housing (including seniors and people with disabilities), and future development plans to further meet the public housing needs of Toledo residents. The DHCD maintains regular communications with LMH leadership regarding issues related to public housing and its residents. Consultations with LMH will continue in efforts to provide safe, adequate, and decent affordable housing to low-income individuals and their families, including the rehabilitation and resale of Low-Income Housing Tax Credit projects that have ended their 15-year compliance period.
2	Agency/Group/Organization	Toledo Lucas County Homelessness Board
	Agency/Group/Organization Type	Continuum of Care Lead Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Toledo Lucas County Homelessness Board (TLCHB) is consulted regularly in all aspects related to ending homelessness in Toledo. The TLCHB was consulted during the creation of this Annual Action Plan. The City will continue to collaborate with the TLCHB on all issues related to homelessness.

3	Agency/Group/Organization	Toledo Fair Housing Center
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Toledo worked with the Fair Housing Center for the development of the Analysis of Impediments (AI). Through the AI, the Fair Housing Center develops action steps needed for the elimination of impediments. The City of Toledo will continue to work collaboratively with the Fair Housing Center towards the elimination of barriers to Fair Housing.

Table 2 – Agencies, groups, organizations who participated

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

All pertinent agencies in the City and County were consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Toledo Lucas County Homelessness Board	Elimination of Homelessness is a goal in both the CoC CASE Plan and the City of Toledo 5-year Consolidated Plan.
Analysis of Impediments to Fair Housing Choice	Toledo Fair Housing Center	Elimination of barriers to housing, particularly adequate affordable housing in areas of opportunity and accessible to all is a goal of the City's 2025 Analysis of Impediments and the Consolidated Plan.
TARTA Next Final Report Sept 2022	TARTA	Local and regional public transportation systems were analyzed in this plan. The City continually evaluates ways to improve transportation services and accessibility to low-moderate- income (LMI) residents. A goal of the Consolidated Plan is to find ways to improve transportation services which facilitate access to jobs for LMI persons. The goal of the TARTA Next Plan is to ensure public transit services in the Toledo area make a positive impact on residents, businesses, and visitors alike.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Forward Toledo	Toledo City Plan Commission	Forward Toledo is the city’s comprehensive land use plan which presents a roadmap for Toledo’s future growth that encourages density and more options for housing, transit and alternative modes of travel, walkability and sustainability. The Consolidated Plan aligns its goals and strategies with Forward Toledo related to more stable housing stock, more jobs for residents, and more attractive neighborhoods.
Toledo Together: 10-Year Action Plan for Housing	Toledo Department of Housing and Community Development	The Plan establishes a unified vision for investments in housing in Toledo and a roadmap to achieve this vision over the next 10 years, focusing on addressing disparities, while creating policies and programs that will benefit everyone, such as an improved environment for residential and mixed- use development. The Consolidated Plan aligns with these goals and priorities.
Toledo Strategic Plan for Arts and Culture	The Arts Commission	The common goal is the reduction of neighborhood blight. Public art and elevating the city’s cultural vibrancy are important contributions to the goal of neighborhood revitalization.
Strategic Plan 2025-2029	Lucas Metropolitan Housing (LMH)	The provision of safe and sustainable affordable housing for LMI residents in Toledo is a goal in both the 5-year Consolidated plan and LMH's strategic plan.
Peace in Motion: Toledo's Path to Community Safety	City of Toledo Mayor Office on Neighborhood Safety and Engagement	This comprehensive five-year plan is a cross-sector, community engaged-and-owned plan that will guide efforts to address gun violence in Toledo for the next five years. The plan is part of an ongoing public health approach to addressing gun violence. Specific elements of the plan can be supported through investments of federal funds.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The Lucas County Multi-Jurisdictional Hazard Mitigation Plan, updated in 2024 by the Lucas County Emergency Management Agency (LCEMA) in partnership with local jurisdictions, identifies natural and human-caused hazards that have the potential to impact residents, housing, infrastructure, public health, and economic stability throughout Lucas County. The Plan establishes strategies to reduce the loss of life, property damage, and community disruption resulting from hazards such as flooding, severe storms, extreme temperatures, harmful algal blooms, lake surge, and other emergency events.

The 2024 update to the Lucas County Multi-Jurisdictional Hazard Mitigation Plan recognizes that vulnerability to disasters is influenced by factors such as income, age, disability, housing conditions, and access to resources. Low- and moderate-income (LMI) households are often disproportionately affected by natural hazards because they are more likely to reside in older housing with deferred maintenance and have

fewer financial resources available for preparedness, recovery, and relocation. The Plan also identifies challenges faced by elderly residents and persons with disabilities, including access to transportation during evacuations, emergency shelters, and post-disaster housing.

The Plan further identifies climate change as a contributing factor to increased hazard risks throughout the region. These risks include more frequent and intense flooding and heavy rainfall events, harmful algal blooms affecting Toledo’s drinking water supply, extreme heat and cold events, severe weather, and fluctuations in Lake Erie water levels. The Plan notes that these hazards can have interconnected impacts on public health, housing, infrastructure, economic activity, and environmental quality.

Consistent with the priorities identified in the 2024 Lucas County Multi-Jurisdictional Hazard Mitigation Plan, the City of Toledo continues to invest in activities that increase community resilience and reduce disaster vulnerability. These efforts include stormwater and drainage improvements, flood mitigation projects, housing rehabilitation programs, infrastructure investments, green infrastructure initiatives, and other community development activities that benefit low- and moderate-income residents. By aligning local housing and community development investments with the goals and strategies outlined in the Hazard Mitigation Plan, the City seeks to reduce the impacts of climate-related hazards, protect vulnerable populations, and strengthen the long-term resilience of Toledo neighborhoods

The City of Toledo Department of Housing and Community Development has cultivated many relationships in the community leading to the development of efficient strategies that assist in addressing community issues. Those relations include individuals, neighborhood groups, investors and organizations working towards the stabilization and growth of Toledo. DHCD will continue to cultivate relationships that result in an effective and efficient implementation of the Consolidated Plan.

AP-12 Participation – 91.105, 91.200(c)

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

Citizen participation continues to be an important part of the Consolidated Planning process because it helps ensure that funding priorities and program decisions reflect the needs and priorities of Toledo residents. Community engagement also helps increase public awareness and understanding of the City's Annual Action Plan and how federal funds are used to support housing, community development, and public service activities.

During the development of the Year Two Annual Action Plan, the City of Toledo gathered input from residents, stakeholders, service providers, planning officials, and community partners. Public participation efforts provided valuable feedback on current community needs, ongoing challenges, and areas where residents believe investments should be focused. This input helped guide the City's funding recommendations, program priorities, and planned activities for the upcoming program year while ensuring that community perspectives remained an important part of the decision-making process.

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

A public notice announcing the mandatory application meeting was published **November 14, 16, and December 2, 2025**. A press release was sent **December 1, 2025, and December 30, 2025**, to news and social media platforms.

On **February 25, February 27, and March 1, 2026**, a public notice was published announcing the availability of the Draft 2026-2027 Action Plan, 30-day comment period and public hearings. On **March 2, 2026**, a press release was sent to news and social media platforms.

Furthermore, the public notices and press releases were emailed to local community partners and the COT's Third-Party Partners. Public comments were accepted from **March 25 through April 24, 2026**.

Two public hearings were held in person on **March 26 and April 2, 2026** in City Council Chambers at 5:30 p.m. Public hearings are held in buildings that are accessible to disabled individuals, wheelchair accessible, and include accessible parking. If there is a virtual public hearing, people with disabilities can request services.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	N/A	N/A	Not Applicable. All comments were accepted.	http://www.toledoblade.com/ http://www.thetoledojournal.com/ http://www.laprensatoledo.com/ http://www.thetruthtoledo.com/

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>A total of 15 residents (3/26/2026 - 11 residents and 4/02/2026 - 4 residents) attended the two public hearings.</p>	<p>At the March 26th public hearing, questions and concerns related to housing development, neighborhood conditions, and program implementation were raised. There were no public comments at the April 2nd public hearing.</p>	<p>Not Applicable. All comments were accepted.</p>	<p>https://toledo.oh.gov/departments/housing-community-development</p>
3	Internet Outreach	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The public notice was posted to the city's website.</p>	<p>N/A</p>	<p>Not Applicable. All comments were accepted.</p>	<p>https://toledo.oh.gov/departments/housing-community-development</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Social Media	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	A total of 7 residents provided comments on the Draft Action Plan.	On the Facebook post, residents provided comments on the Draft Action Plan, with feedback primarily focused on accessibility, equitable neighborhood investment, housing diversity, concerns about gentrification, and the need for greater transparency and program detail.	Not Applicable. All comments were accepted.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Toledo receives three annual entitlement allocations from the U.S. Department of Housing and Urban Development (HUD), including the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG). These federal resources support housing, community development, and programs that assist low- and moderate-income residents throughout the city.

The City's 2025-2029 Five-Year Consolidated Plan establishes the strategic framework for how the Department of Housing and Community Development (DHCD) will administer these funds over the five-year period to address identified housing, community, and economic development needs. The Consolidated Plan outlines the City's policies, priorities, and goals based on an assessment of local housing conditions, the housing market, homelessness, public service needs, and economic development opportunities.

The table below summarizes expected resources available to address the goals of this Annual Action Plan.

The City's allocation for PY 2026 include:

- CDBG: **\$7,026,026.00**
- HOME: **\$1,971,147.86**
- ESG: **\$619,354.00**

An additional **\$985,000.00** in CDBG Prior Year Resources, **\$5,759,943.00** in HOME Prior Year Resources and **\$559,876.30** in HOME Program Income is estimated to be utilized for the 2026 Program Year to address priority needs and goals. The 2026-2027 program year for the City of Toledo starts on 7/1/2026 and ends on 6/30/2027. This plan represents the second Annual Action Plan implementing the goals and priorities in the City's 2025-2029 Five-Year Consolidated Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$7,026,026.00	\$900.00	\$985,000.00	\$8,011,926.00	\$21,078,078.00	The CDBG program is a flexible program that provides resources to address a wide range of unique housing and community development needs to ensure decent affordable housing, to provide services to the most vulnerable in our communities, and to create jobs through the expansion and retention of businesses.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$1,971,147.85	\$559,876.30	\$5,759,943.00	\$8,290,967.15	\$5,913,443.55	The HOME Program allows for a wide range of affordable housing activities including acquisition, development of new homeownership and rental housing, homeowner and rental rehabilitation, homebuyer activities, and tenant-based rental assistance, with the intent to provide safe, adequate and decent affordable housing to lower-income households and expand the capacity of non-profit housing providers.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$619,354.00	\$0.00	\$0.00	\$619,354.00	\$1,858,062.00	In accordance with the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, HUD distributes Emergency Solutions Grant (ESG) funds to communities for street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and homeless management information systems. The annual allocations are typically fully expended every program year.

Table 5 - Expected Resources – Priority Table

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

Many of the goals mentioned in the Consolidated Plan rely heavily on CDBG funding. HOME and ESG funding also help to advance affordable housing programs and homelessness prevention activities. By combining these resources with other local, state, and federal resources (where applicable), the city is better positioned to respond to and meet the community's varied needs. The coordination of these financing sources, together with excellent connections with community organizations and stakeholders, strengthens the city's overall ability to deliver effective programs and services. This collaborative approach enables the city to increase the scope and impact of its projects. The city's combined investments help to provide a more stable and suitable living environment for every resident.

HOME and ESG funds both have mandatory matching requirements. While CDBG funds do not require a match, the DHCD's policy requires all Third-Party Partners that receive CDBG funds to provide a 1:1 match for every dollar received. This is the same 1:1 match as required by HUD for ESG funds. Applicants for CDBG and ESG funding must specify and document the match in their submissions. HUD sets the matching requirement for HOME funding based on extreme fiscal distress criteria. According to CFR 92.218, match contributions must account for at least 25% of funds drawn from the HOME program.

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

The City of Toledo continues to partner with the Lucas County Land Reutilization Corporation (Land Bank) to support housing, economic development, and neighborhood revitalization activities using CDBG and HOME funds. The Land Bank acquires vacant and abandoned properties for rehabilitation, redevelopment, and community reuse, including affordable housing, community gardens, and side-lot expansions for neighboring homeowners. The City also continued blight removal efforts through its Urban Beautification program, which funds the demolition of vacant and unsafe structures. Nearly 1,000 properties were demolished between January 2020 and early April 2025, with an additional 500 demolitions planned through 2025 and 2026.

In meeting HUD's CDBG objective of benefit to low- and moderate-income persons and Elimination of Slum and Blight, the Land Bank meets the following goals and objectives established in this plan:

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

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

and real estate incentives.

Discussion

The City of Toledo has continued to collaborate with residents, community organizations, and other stakeholders through various planning initiatives to identify neighborhood and regional needs. These efforts resulted in community plans with established goals, priorities, and recommended activities to guide future investment. The City continues to leverage CDBG, HOME, and ESG funding alongside other public and private investments to support targeted neighborhood improvements and address community development needs.

One strategy identified by the City is the use of CDBG Neighborhood Revitalization Strategy Areas (NRSA) to target federal funding and coordinate it with other public and private investments to support neighborhood revitalization efforts.

DHCD is launching the NRSA UPLIFT Program in the Englewood, Junction, and Old South End areas to address the appraisal gap, which is defined as the difference between a project's total development costs and the market price at which it may be sold. The program will leverage public funding to fill appraisal gaps in the development of affordable housing. UPLIFT expands on DHCD's previous programs and incorporates a diverse set of stakeholders and partners. The program includes two activities:

- Providing a subsidy to eligible developers, based on the difference or gap between the costs to build new or substantially rehabilitated homes and the appraised/sale value of the home. Rehabilitated and new homes will be sold to first-time, low-income homebuyers.
- The program will also provide a grant to first-time, low-income homebuyers purchasing a home in NRSA that is in need of rehabilitation. DHCD will work with area lenders to advertise renovation mortgage products, providing a grant to reduce construction costs.

The NRSA UPLIFT Program is funded through several program sources:

- **2023 Community Project Funding:** In 2024, COT received a \$4 million federal Community Project Funding Grant sponsored by Rep. Marcy Kaptur. Of this award, \$1,500,000 is dedicated to the UPLIFT Program.
- **2024 HUD PRO Housing:** Toledo received \$4,000,000 for a comprehensive zoning rewrite, pre-approved templates for new housing construction, and funding for the UPLIFT Program. DHCD received \$1,600,000 for the program pool and, with the grant award, had pledged to expand the program from two to all three NRSAs and to increase the overall funding impact to 75 new or preserved homes during the grant performance period.
- **2025 Welcome Home Ohio:** The City of Toledo is applying for \$9,500,000 from the Ohio Department of Development 2025 Welcome Home Ohio grant. This additional funding will provide up to \$100,000 in subsidies per home for the rehabilitation or construction of 125 homes.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Development	2025	2029	Affordable Housing	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA	Affordable Housing Development	HOME: \$4,962,093.00	Rental units constructed: 50 Household Housing Unit Homeowner Housing Added: 4 Household Housing Unit
2	Homeownership Opportunities	2025	2029	Affordable Housing	Citywide	Homeownership Opportunities	HOME: \$1,000,000.00	Direct Financial Assistance to Homebuyers: 70 Households Assisted
3	Housing Improvements	2025	2029	Affordable Housing	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood	Housing Improvements	CDBG: \$1,925,000.00 HOME: \$1,571,883.00	Homeowner Housing Rehabilitated: 100 Household Housing Unit
4	Slum and Blight Clearance	2025	2029	Affordable Housing	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood	Housing Improvements Slum and Blight Clearance	CDBG: \$100,000.00	Housing Code Enforcement/Foreclosed Property Care: 10 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Fair Housing Planning & Services	2025	2029	Affordable Housing	Citywide	Fair Housing Planning & Services	CDBG: \$160,000.00	Public service activities for Low/Moderate Income Housing Benefit: 450 Households Assisted
6	Public Services	2025	2029	Non-Homeless Special Needs	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood	Public Services	CDBG: \$1,273,900.00	Public service activities other than Low/Moderate Income Housing Benefit: 10440 Persons Assisted
7	Homelessness Services	2025	2029	Homeless	Citywide	Services for the Homeless	ESG: \$619,354.00	Tenant-based rental assistance / Rapid Rehousing: 20 Households Assisted Homeless Person Overnight Shelter: 900 Persons Assisted
8	Infrastructure & Public Facility Improvements	2025	2029	Non-Housing Community Development	Citywide	Infrastructure & Public Facility Improvements	CDBG: \$1,000,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 9000 Persons Assisted
9	Economic Development	2025	2029	Non-Housing Community Development	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA	Economic Development	CDBG: \$939,200.00	Businesses assisted: 200 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Planning and Administration	2025	2029	Administration	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood	Affordable Housing Development Homeownership Opportunities Housing Improvements Slum and Blight Clearance Fair Housing Planning & Services Public Services Services for the Homeless Infrastructure & Public Facility Improvements Economic Development	CDBG: \$1,595,205.00 HOME: \$197,114.00	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing Development
	Goal Description	Funds will be used to assist in the creation or preservation of affordable housing units for rental and homeownership.
2	Goal Name	Homeownership Opportunities
	Goal Description	Funds will be used to support low- and moderate-income residents in accessing homeownership through the Home at Last down payment assistance program.

3	Goal Name	Housing Improvements
	Goal Description	Funds will be used to support low- and moderate-income residents in the rehabilitation, modernization, and accessibility modification of their homes to ensure housing is healthy, safe, lead free, and can accommodate the city's aging population and persons with disabilities.
4	Goal Name	Slum and Blight Clearance
	Goal Description	Funds will be used to ensure vacant, abandoned, or foreclosed housing is secured, free from health and safety hazards, or demolished to enhance the living environment of neighborhood residents.
5	Goal Name	Fair Housing Planning & Services
	Goal Description	Funds will be used to help eliminate discrimination in the provision of housing and housing-related services and reduce segregation by affirmatively promoting inclusive communities and increasing the supply of genuinely open housing.
6	Goal Name	Public Services
	Goal Description	Funds will be used to support nonprofit agencies in the provision of public services including crime prevention and safety, programs for youth and seniors, healthcare and mental health services, basic needs and food assistance, transportation support, community nonprofit capacity building, and other services needed in the community. The funds will also be used to support specific populations such as the homeless, veterans, victims of domestic violence, and other special needs populations as required.
7	Goal Name	Homelessness Services
	Goal Description	Funds will be used to operate a centralized system for homeless assistance to determine needs and match individuals and families with the type of assistance needed. Funding will also provide outreach services, emergency shelter, temporary housing, and rapid rehousing assistance for the homeless population and those at risk of homelessness.
8	Goal Name	Infrastructure & Public Facility Improvements
	Goal Description	The city will use CDBG funds to support the rehabilitation of public facilities to ensure that nonprofit agencies are able to best serve the low- and moderate-income residents of the city by making strategic rehabilitation improvements. CDBG funds may be used for city buildings that require accessibility improvements to ensure they can adequately serve the city's population that have mobility challenges. CDBG funds may be used for public infrastructure improvements in CDBG eligible Census Tracts or Block Groups specifically to make street and sidewalk improvements, public parks, sewer improvements, and to address any flood drainage or related emergency management issues, and other issues as appropriate.

9	Goal Name	Economic Development
	Goal Description	Funds will be used to support the development and growth of small businesses in the City of Toledo through the provision of loans and grants through the city's Economic Development office or in partnership with relevant economic development agencies in the city. The types of assistance may include grants, loans, technical assistance, small business development or mentorship programs, or other types of incentives and services targeting for-profit businesses in Toledo.
10	Goal Name	Planning and Administration
	Goal Description	Funds will be used to ensure the proper administration and management of the CDBG, HOME, and ESG programs.

Projects

AP-35 Projects – 91.220(d)

Introduction

The COT's priority housing and community development needs were identified in the 2025-2029 Five-Year Consolidated Plan. The DHCD will continue coordinating the use of CDBG, HOME, and ESG funds to implement strategies and activities that address the needs of low- to moderate-income households and neighborhoods.

The following projects are proposed for the 2026 (52nd) PY and are intended to address the priority needs and objectives identified in the Consolidated Plan. Funding allocations for these activities will support housing, public services, neighborhood revitalization, economic development, and homeless assistance initiatives throughout the community. The available funding for the 2026 (52nd) PY includes the following:

- CDBG: \$7,026,026.00
- HOME: \$1,971,147.86
- ESG: \$619,354.00

To ensure consistency with actual allocation amounts, budgets for all proposed projects were proportionally adjusted to reflect revised funding levels.

Projects

#	Project Name
1	DHCD: Planning and Administration
2	DHCD: Division of Housing Program Delivery
3	Housing Preservation/Housing Retro Fit
4	Community Housing Development Organization (CHDO) Set-Aside
5	Homeowner Rehabilitation (Subrecipient and Internal)
6	Rental Housing Development
7	Down-Payment Assistance (HOME At Last Program)
8	HOME Buyer Units Development (Maumee Valley Habitat for Humanity)
9	COT Rooftops Program
10	2026 Homelessness Services
11	Public Services
12	CBDO Public Service - Sofia Quintero Art and Cultural Center
13	CBDO Public Service - Toledo Fair Housing Center
14	Historic South Initiative - Roof Replacements
15	Lucas Metropolitan Housing (LMH)/Lucas Housing Services Corporation - LHSC Work Your Way Home
16	Maumee Valley Habitat for Humanity - Home Preservation
17	Pathway, Inc. - Senior Emergency Repair for Housing
18	Neighborhood Sites Master Planning
19	Fair Housing Opportunities of Northwest Ohio

#	Project Name
20	HUD Section 108 Debt Service
21	COT: Department of Parks and Youth Services
22	Toledo Neighborhood Capacity Building Institute (TNCBI)
23	NRSA Code Compliance Demolition
24	NRSA Strategic Economic Development Initiative
25	BESN X Community - BXC Pathway Program
26	Cherry Street Mission - CSM Workforce Development Food Truck
27	Economic & Community Development Institute Inc - ECDI Toledo TA and Loan Fund
28	Inclusive of Women dba Women of Toledo - Economic Empowerment Initiatives
29	Toledo Urban Federal Credit Union - Toledo Urban Business Scale-Up Program
30	Office of Community Services - Youth Employment Program

Table 7 - Project Information

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

The City of Toledo’s priorities were determined by reviewing data from the Citizen Participation and Agency Consultation process section of the 2025-2029 Five-Year Consolidated Plan, as well as data from the Needs Assessment and Market Analysis sections. As a result of the findings, the City identified priority needs and associated goals to address these needs. The following are the key priorities identified:

- Affordable Housing Development
- Homeownership Opportunities
- Housing Improvements
- Slum and Blight Clearance
- Fair Housing Planning & Services
- Public Services
- Services for the Homeless
- Infrastructure & Public Facility Improvements
- Economic Development

To address these priority needs, associated goals were developed and linked to these needs, allocation amounts were identified, and specific quantifiable outcomes were identified.

The greatest hurdle to addressing underserved needs in the city is the consistent decrease in program funding as a result of federal, state, and municipal budget cuts. Even as demands grow, housing and non-housing funding are insufficient to meet the demand for unmet needs. In recent years, the overall amount of funding requested has regularly exceeded the total amount available. Inadequate financial resources have also been identified as the most significant barrier to organizations serving underserved needs.

In order to further fair housing, the City contracted with the Fair Housing Center to conduct an Analysis

of Impediments to Fair Housing Choice (AI), which identified impediments to obtaining safe, adequate, and affordable housing. The City continues to work in partnership with the Fair Housing Center and other community stakeholders to implement the Fair Housing Action Plan and reduce the impediments to fair and affordable housing opportunities.

AP-38 Project Summary

Project Summary Information

1	Project Name	DHCD: Planning and Administration
	Target Area	Citywide
	Goals Supported	Affordable Housing Development Homeownership Opportunities Housing Improvements Slum and Blight Clearance Fair Housing Planning & Services Public Services Homelessness Services Infrastructure & Public Facility Improvements Economic Development Planning and Administration
	Needs Addressed	Affordable Housing Development Homeownership Opportunities Housing Improvements Slum and Blight Clearance Fair Housing Planning & Services Public Services Services for the Homeless Infrastructure & Public Facility Improvements Economic Development
	Funding	CDBG: \$1,145,205.00 HOME: \$197,114.79
	Description	The general operations in terms of administration and reporting requirements, program administration and staff monitoring, neighborhood revitalization, and fiscal oversight.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	This project will not directly benefit low- to moderate-income residents but is necessary for the effective management of the CDBG, HOME, and ESG programs.
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	Administration and oversight of all grant activities, functions, and procedures including technical assistance to subgrantees as needed. This includes staffing and related overhead costs associated with the planning, administration, development, and implementation of the Consolidated Plan, Annual Action Plan, and CAPER; data tracking and reporting; federal grant reporting; IDIS data input; fiscal management; and monitoring activities, including on-site monitoring visits, review and evaluation of subrecipient performance, assessment of program progress and compliance, and adherence to federal regulations, as well as overall management of grant funds and related activities.
2	Project Name	DHCD: Division of Housing Program Delivery
	Target Area	Citywide

	Goals Supported	Housing Improvements
	Needs Addressed	Housing Improvements
	Funding	CDBG: \$900,000.00
	Description	Funding to support staffing costs associated with the Department of Housing and Community Development Housing Division for program delivery activities, including application intake, underwriting, construction and project management, inspections, monitoring, and other related costs associated with the City's and third-party partners home repair programs.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	This project will not directly benefit low- to moderate-income residents but is necessary for the effective management of the home repair, rehabilitation, and new construction programs. Project outcomes are quantified for each project below.
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	Activities administered by the Housing Division include owner-occupied rehabilitation; homebuyer unit production through new construction or acquisition, rehabilitation, and resale; down payment and closing cost assistance through the Home-At-Last Program; paint, roof, and emergency repair programs; lead-based paint hazard reduction programs; and rental housing development projects.
3	Project Name	Housing Preservation/Housing Retro Fit
	Target Area	Citywide
	Goals Supported	Housing Improvements
	Needs Addressed	Housing Improvements
	Funding	CDBG: \$300,000.00
	Description	Funding will support the substantial rehabilitation and retrofit of owner-occupied residential properties for low- and moderate-income households within the City of Toledo, including eligible material and construction costs.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 2 LMI households will benefit from this project.
	Location Description	Housing units will be located throughout the city of Toledo.
	Planned Activities	Owner-occupied housing rehabilitation and housing rehabilitation for resale. Eligible activities may include rehabilitation of residential properties, energy-efficiency improvements, accessibility modifications, correction of code violations, lead-based paint hazard reduction, roofing, structural repairs, replacement of major systems, weatherization, emergency repairs, and other improvements necessary to provide safe, decent, sanitary, and affordable housing.
4	Project Name	Community Housing Development Organization (CHDO) Set-Aside
	Target Area	Citywide
	Goals Supported	Affordable Housing Development

	Needs Addressed	Affordable Housing Development
	Funding	HOME: \$845,672.18
	Description	GAP financing and operating assistance are available for single- or multi- family rehabilitation or new construction projects owned, developed, or sponsored by Community Housing Development Organizations (CHDOs).
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 4 LMI households will benefit from this project.
	Location Description	Housing units will be located throughout the city of Toledo.
	Planned Activities	New construction of homeownership housing.
5	Project Name	Homeowner Rehabilitation (Subrecipient and Internal)
	Target Area	Citywide
	Goals Supported	Housing Improvements
	Needs Addressed	Housing Improvements
	Funding	HOME: \$1,571,883.00
	Description	To assist low- and moderate-income homeowners with housing rehabilitation in order to restore their homes to decent, safe, and sanitary conditions, thereby preserving the housing stock. Implemented by sub-recipients and the City of Toledo Housing Division.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	15 low- and moderate-income homeowners will benefit from this activity.
	Location Description	Housing units will be located throughout the city of Toledo.
	Planned Activities	Homeowner housing rehabilitation to address code violations, health and safety concerns, and lead-based paint hazards.
6	Project Name	Rental Housing Development
	Target Area	Citywide
	Goals Supported	Affordable Housing Development
	Needs Addressed	Affordable Housing Development
	Funding	HOME: \$3,716,420.89
	Description	The gap financing for new construction or rehabilitation of multi-unit rental housing developed by non-profit or for-profit developers. The projects are chosen based on gap funding requirements, consistency with COT affordable housing priorities, readiness to proceed, and successfully securing all land use entitlements and project financing commitments.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	50 low- and moderate-income households will benefit from this project.

	Location Description	Housing units will be located throughout the city of Toledo.
	Planned Activities	The projects are intended to bridge the funding gap for developers and agencies working on multi-unit projects. These are multi-unit buildings that have undergone new construction, rehabilitation, or conversion to housing.
7	Project Name	Down-Payment Assistance (HOME At Last Program)
	Target Area	Citywide
	Goals Supported	Homeownership Opportunities
	Needs Addressed	Homeownership Opportunities
	Funding	HOME: \$1,000,000.00
	Description	To provide eligible first-time home buyer households purchasing single-family units with 0% interest deferred payment loans for down payment and closing cost assistance.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	70 low- and moderate-income households will benefit from this project.
	Location Description	Citywide
Planned Activities	Provision of direct financial assistance to low- and moderate-income homebuyers for down payments and closing costs.	
8	Project Name	HOME Buyer Units Development (Maumee Valley Habitat for Humanity)
	Target Area	Citywide
	Goals Supported	Affordable Housing Development Homeownership Opportunities Housing Improvements
	Needs Addressed	Affordable Housing Development Homeownership Opportunities Housing Improvements
	Funding	HOME: \$400,000.00
	Description	The new construction or acquisition, rehabilitation, and resale of homebuyer units.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	2 low- and moderate-income families will benefit from this activity.
	Location Description	Citywide
Planned Activities	To provide gap financing for new construction or acquisition, rehabilitation, and resale of homebuyer units. Green building standards will be followed during construction and rehabilitation.	
9	Project Name	COT Rooftops Program

	Target Area	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood
	Goals Supported	Housing Improvements
	Needs Addressed	Housing Improvements
	Funding	CDBG: \$417,721.00
	Description	To provide roof repair or replacement services in the City of Toledo.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	20 low- and moderate-income households will benefit from a roof repair/replacement.
	Location Description	Housing units will be located throughout the city of Toledo.
	Planned Activities	Roof repairs/replacements for low- and moderate-income households.
10	Project Name	2026 Homelessness Services
	Target Area	Citywide
	Goals Supported	Homelessness Services
	Needs Addressed	Services for the Homeless
	Funding	ESG: \$619,354.00
	Description	The provision of services to the homeless and those at risk of becoming homeless in the community, as well as services related to the overall management of the community's homeless system.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	900 homeless individuals will be provided with shelter, and 20 households will receive rapid rehousing assistance.
	Location Description	Citywide
	Planned Activities	The activities related to coordinated assessment, rapid re-housing, direct financial assistance, permanent supportive housing, emergency shelters, youth homelessness, Homeless Management Information System (HMIS) and administration of the TLCHB.
11	Project Name	Public Services
	Target Area	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$1,053,900.00
	Description	Various public service activities provided by nonprofit subrecipient agencies throughout the city.

	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	8,990 low- and moderate-income persons will be assisted.
	Location Description	Public service activities will be provided throughout the city of Toledo.
	Planned Activities	<p>The following agencies will provide a variety of public service activities to low- and moderate-income persons within the city of Toledo.</p> <ul style="list-style-type: none"> • The Arts Commission • Believe Center • Compassion Health Toledo • Connecting Kids to Meals • Grace Community Center • Legal Aid of Western Ohio • Martin Luther King Kitchen for the Poor • Neighborhood Health Association • NeighborWorks Toledo Region • Toledo GROWs
12	Project Name	CBDO Public Service - Sofia Quintero Art and Cultural Center
	Target Area	Old South End NRSA
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$145,000.00
	Description	Funding for the Sofia Quintero Art and Cultural Center Community Garden Development Initiative (CGDI) located in the Old South End NRSA.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 450 low- and moderate-income persons in the Old South End NRSA will benefit from this project.
	Location Description	Old South End NRSA
Planned Activities	The Community Garden Development Initiative (CGDI) supports individuals experiencing food insecurity and barriers to accessing nutritious foods. The program utilizes repurposed vacant lots within the Old South End NRSA to grow fresh vegetables, fruits, herbs, and other produce for community benefit. Planned activities include continued development and maintenance of community gardens, expanded access to healthy food, and neighborhood revitalization through the transformation of vacant and underutilized lots into productive community spaces.	
13	Project Name	CBDO Public Service - Toledo Fair Housing Center
	Target Area	Old South End NRSA
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$75,000.00

	Description	Funding for the Toledo Fair Housing Center to provide Reinvestment Legal Services to low- to moderate-income households in the Old South End NRSA.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 15 low- and moderate-income households will benefit from this project.
	Location Description	Old South End NRSA
	Planned Activities	This neighborhood revitalization project, implemented by the Fair Housing Center as a Community Based Development Organization within the Old South End Neighborhood Revitalization Strategy Area (NRSA), will improve housing conditions and reduce neighborhood blight through enforcement of landlord-tenant laws, housing code compliance, receivership actions for nuisance and blighted properties, and resolution of tangled title issues. The project will also provide resident education on housing rights and responsibilities to support safe, decent, and habitable housing.
14	Project Name	Historic South Initiative - Roof Replacements
	Target Area	Old South End NRSA
	Goals Supported	Housing Improvements
	Needs Addressed	Housing Improvements
	Funding	CDBG: \$250,000.00
	Description	Homeowner housing rehabilitation, primarily roofing, for low-to-moderate income, owner-occupied households within the Old South End NRSA.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	20 LMI households will benefit from this project.
	Location Description	Old South End NRSA
	Planned Activities	Rehabilitation of owner-occupied homes, primarily roofing.
15	Project Name	Lucas Metropolitan Housing (LMH)/Lucas Housing Services Corporation - LHSC Work Your Way Home
	Target Area	Junction Choice Neighborhood NRSA
	Goals Supported	Housing Improvements
	Needs Addressed	Affordable Housing Development Homeownership Opportunities Housing Improvements
	Funding	CDBG: \$75,000.00
	Description	Funds will be used to fully renovate one single-family home in the Junction Neighborhood in order to make the home available for purchase by low- and moderate-income household through Lucas Metropolitan Housing (LMH) nonprofit affiliate Lucas Housing Services Corporation (LHSC).
	Target Date	6/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	1 LMI household will benefit from this project.
	Location Description	Junction Choice Neighborhood NRSA
	Planned Activities	The activities associated with the repair, rehabilitation, and purchase of properties to LMH residents.
16	Project Name	Maumee Valley Habitat for Humanity - Home Preservation
	Target Area	Citywide Old South End NRSA Junction Choice Neighborhood NRSA
	Goals Supported	Housing Improvements
	Needs Addressed	Housing Improvements
	Funding	CDBG: \$600,000.00
	Description	Comprehensive homeowner housing rehabilitation for low-to-moderate income, owner-occupied households throughout the city of Toledo, East Toledo, and within the Old South End, Englewood, and Junction Choice Neighborhood NRSAs to address critical needs such as code violations, health and safety concerns, and deferred repairs that threaten long-term habitability.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	6 LMI households will benefit from this project, 3 - located through the city and the Junction NRSA, 3 - in the Old South NRSA and East Toledo, and 4 - in the Englewood NRSA.
	Location Description	Homes located throughout the city of Toledo and in specific NRSA areas.
	Planned Activities	Comprehensive rehabilitation of owner-occupied homes, including the correction of code violations, remediation of health and safety hazards, and completion of deferred maintenance repairs that may affect the long-term habitability of the property.
17	Project Name	Pathway, Inc. - Senior Emergency Repair for Housing
	Target Area	Citywide Junction Choice Neighborhood NRSA
	Goals Supported	Housing Improvements
	Needs Addressed	Housing Improvements
	Funding	CDBG: \$400,000.00
	Description	Housing rehabilitation program for homes occupied by seniors aged 62 and older and/or disabled residents located throughout the city of Toledo, and within the Junction Choice Neighborhood NRSA.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	36 LMI senior and/or disabled households will benefit from this project, 18 throughout the city and 18 in the Junction Choice Neighborhood NRSA.
	Location Description	Homes located throughout the city of Toledo and in Junction NRSA.

	Planned Activities	Rehabilitation of owner-occupied homes, primarily repairing or replacing furnaces, hot water heaters and tanks, plumbing issues, faulty electrical problems, and other critical repairs within the home to ensure families can remain in their homes.
18	Project Name	Neighborhood Sites Master Planning
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Affordable Housing Development Homeownership Opportunities Housing Improvements Slum and Blight Clearance Fair Housing Planning & Services Public Services Services for the Homeless Infrastructure & Public Facility Improvements Economic Development
	Funding	CDBG: \$100,000.00
	Description	Funds will be used support the evaluation, planning, and redevelopment of targeted neighborhood sites to promote long-term community revitalization and strategic land use.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	This project will not directly benefit low/moderate income residents but is necessary for the effective management of the CDBG, HOME, and ESG programs.
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
Planned Activities	Activities may include site analysis, community engagement, feasibility studies, conceptual design planning, infrastructure assessment, and the development of redevelopment strategies intended to guide future housing, economic development, public facility, and neighborhood improvement initiatives.	
19	Project Name	Fair Housing Opportunities of Northwest Ohio
	Target Area	Citywide
	Goals Supported	Fair Housing Planning & Services
	Needs Addressed	Fair Housing Planning & Services
	Funding	CDBG: \$160,000.00
	Description	This project includes activities to ensure that residents, regardless of income, have equitable housing options and to advance the implementation of the Analysis of Impediments (AI) Action Plan steps toward the elimination of impediments to equitable housing choice. (This Fair Housing activity is carried out as part of the general program administration of the Department of Housing and Community Development).
Target Date	6/30/2027	

	Estimate the number and type of families that will benefit from the proposed activities	450 households potentially facing housing discrimination will benefit from this activity.
	Location Description	Citywide
	Planned Activities	The planned activities include the following administrative activities related to housing discrimination: <ul style="list-style-type: none"> • Fair Housing Enforcement; • Trainings (for the public and the housing industry); • Information dissemination at outreach events; and • Implementation of action steps identified in the current Analysis of Impediments (AI).
20	Project Name	HUD Section 108 Debt Service
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Economic Development
	Funding	CDBG: \$200,000.00
	Description	Repayment of Section 108 loan.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	Repayment of Section 108 loan.
21	Project Name	COT: Department of Parks and Youth Services
	Target Area	Citywide
	Goals Supported	Infrastructure & Public Facility Improvements
	Needs Addressed	Infrastructure & Public Facility Improvements
	Funding	CDBG: \$1,000,000.00
	Description	Revitalization of six parks (Savage Park, New Park in Vistula Neighborhood, Collins Park, Ravine II Park Ballfields, New Park in Englewood Neighborhood and Sports Facility Feasibility Study) located in the City of Toledo.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	9,000 Toledo residents will benefit from this project.
	Location Description	Citywide

	Planned Activities	<p>Savage Park: Purchase and installation of new open-air picnic shelter, and execution of associated sitework.</p> <p>Vistula Park: Installation of playground and picnic facilities as a first phase of development plan implementation.</p> <p>Collins Park: Demolition of the pool and all associated structures.</p> <p>Ravine II Park: Repair of water and sewer lines at the ballfield complex as well as some playing field upgrades.</p> <p>Englewood Park: Site clean-up activities on several contiguous city owned parcels in preparation for establishing a new park in the neighborhood..</p> <p>Sports Facility Feasibility Study: Feasibility study for construction of an indoor sports facility on Monroe Street at the former Jobs and Family Services Site.</p>
22	Project Name	Toledo Neighborhood Capacity Building Institute (TNCBI)
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Public Services
	Funding	CDBG: \$150,000.00
	Description	Providing technical capacity training and project grants to nonprofit organizations to help them build organizational capacity and project management skills in order to carry out neighborhood revitalization and economic development activities.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	10 non-profit organizations
	Location Description	Citywide
	Planned Activities	Activities will include organizational assessment, technical assistance, and the distribution of mini grants for CDBG eligible neighborhood and economic development projects, as well as project development for nonprofit organizations.
23	Project Name	NRSA Code Compliance Demolition
	Target Area	Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA
	Goals Supported	Slum and Blight Clearance
	Needs Addressed	Slum and Blight Clearance
	Funding	CDBG: \$100,000.00
	Description	Addresses vacant, abandoned, foreclosed, and code-deficient structures within the Neighborhood Revitalization Strategy Area (NRSA) to eliminate blighting conditions, address health and safety concerns, support code compliance efforts, and promote neighborhood stabilization and revitalization.
	Target Date	6/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	This project will not directly benefit low- and moderate-income residents; however, it is necessary to support neighborhood revitalization and long-term stabilization efforts within the NRSA areas.
	Location Description	Junction Choice Neighborhood NRSA Old South End NRSA Englewood NRSA
	Planned Activities	Activities include demolition, site clearance, code enforcement, nuisance abatement, environmental remediation, and related property stabilization efforts to eliminate blight and support neighborhood revitalization within the NRSA areas.
24	Project Name	NRSA Strategic Economic Development Initiative
	Target Area	Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$285,000.00
	Description	To support economic development activities within a Neighborhood Revitalization Strategy Area (NRSA) to stimulate investment, promote business growth, create job opportunities for low- and moderate-income residents, and strengthen neighborhood commercial corridors.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	5 businesses assisted
	Location Description	Junction Choice Neighborhood NRSA Old South End NRSA Englewood NRSA
Planned Activities	Activities will include support for small business development and expansion, facade and commercial property improvements, targeted investments to revitalize neighborhood commercial corridors, and initiatives that promote job creation and economic opportunities for low- and moderate-income residents.	
25	Project Name	BESN X Community - BXC Pathway Program
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$50,000.00

	Description	To provide community-based workforce training and career readiness services for low-to moderate-income young adults in Toledo. The program focuses on technology, digital media, esports and game development, and emerging artificial intelligence career pathways. Through hands-on instruction, mentorship, and workforce preparation activities, participants gain technical skills, career exposure, and employment readiness to support long-term economic mobility and access to sustainable career opportunities.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	35 low- and moderate-income persons will be benefit from this project.
	Location Description	Citywide
	Planned Activities	Program activities include digital literacy instruction, technology training, esports and game development education, and emerging artificial intelligence skill development. Participants receive hands-on learning opportunities that support resume development, interview preparation, digital portfolio creation, job search assistance, and professional communication skills. The program also provides career exploration, mentorship, leadership development, and connections to internships, apprenticeships, educational institutions, and workforce partners. Through structured training and supportive services, participants build employment readiness, increase access to career opportunities, and strengthen long-term economic mobility.
26	Project Name	Cherry Street Mission - CSM Workforce Development Food Truck
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Public Services Economic Development
	Funding	CDBG: \$57,000.00
	Description	To provide low- and moderate-income individuals with workforce development education and training through Cherry Street Mission Workforce Development Food Truck program.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	10 low- to moderate-income persons will benefit from this activity.
	Location Description	Citywide

	Planned Activities	Project activities include structured workforce development and hands-on job training through Food Truck Operations programming. Participants receive instruction in food preparation, food safety and sanitation practices, customer service, cash handling, teamwork, communication, time management, and workplace professionalism. The project also includes supervised on-the-job training through scheduled food truck operations, providing participants with paid work experience in real-world environments. Additional activities include employment readiness training, mentorship, resume development, interview preparation, and supportive services designed to strengthen participants' ability to secure and retain long-term employment.
27	Project Name	Economic & Community Development Institute Inc - ECDI Toledo TA and Loan Fund
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$265,000.00
	Description	To expand economic opportunities for low-to-moderate income (LMI) entrepreneurs by increasing access to affordable capital and individualized business support services. Through a revolving loan fund capitalized with CDBG and HUD Section 108 resources, the program will provide responsible small business loans paired with one-on-one technical assistance designed to improve business sustainability, financial management, and long-term economic stability.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	30 businesses assisted
	Location Description	Citywide
	Planned Activities	Provide affordable small business loans through a revolving loan fund supported by CDBG and HUD Section 108 funds, paired with one-on-one technical assistance for Toledo entrepreneurs. Services will include business planning, financial management, credit readiness, compliance support, outreach, eligibility verification, and ongoing business support to help low-to-moderate income entrepreneurs start, sustain, and grow their businesses.
28	Project Name	Inclusive of Women dba Women of Toledo - Economic Empowerment Initiatives
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$50,000.00
	Description	To create economic opportunities through technical assistance, business engagement, and mentorship for small business owners and entrepreneurs.
	Target Date	6/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	30 businesses assisted
	Location Description	Citywide
	Planned Activities	Activities will include one-on-one technical assistance, group seminars, business mentoring, financial counseling, virtual support, mobile outreach and program support & outreach.
29	Project Name	Toledo Urban Federal Credit Union - Toledo Urban Business Scale-Up Program
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$75,000.00
	Description	To strengthen small business sustainability and growth among low- to moderate-income entrepreneurs across Toledo Urban Federal Credit Union field of membership.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	50 businesses assisted
	Location Description	Citywide
	Planned Activities	Activities will include providing structured business education and accessible technical assistance to for-profit businesses, focused on financial analysis, budgeting and cash-flow management, credit readiness, and capital preparation.
30	Project Name	Office of Community Services - Youth Employment Program
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$157,200.00
	Description	A structured youth employment program that provides paid work experience, career exploration, and skill development for youth ages 16-24. The program will prioritize participants from low- to moderate-income households and neighborhoods, including NRSA areas.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	20 persons assisted
	Location Description	Citywide
Planned Activities	Activities will include structured employment opportunities, paid work experience, career exploration, and skill development for long term employment.	

AP-50 Geographic Distribution – 91.220(f)

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

Federally funded activities, such as public services, economic development, housing rehabilitation, home repairs, and new construction are generally provided citywide to low- and moderate-income (LMI) individuals and households in accordance with CDBG, HOME, and ESG program requirements.

The City has identified and mapped census tracts where at least 51% of the population is LMI, including tracts 8, 9, 10.01, 10.02 11, 12.02, 13.02, 14, 15, 16.01, 16.02, 17, 18, 19, 20, 24.01, 24.02, 25, 26, 27, 28, 29, 30, 31, 32, 33, 35, 36, 39.01, 39.02, 40, 42, 46, 47.01, 47.02, 48, 49, 50, 51.01, 51.02, 52, 53, 54, 57.01, 59.02, 66, 67, 68.01, 68.02, 73.02, 73.06, 73.07, 103, 105 and 106. Area benefit activities are primarily directed to these designated LMI areas.

In addition, the City has identified four targeted geographic areas for place-based strategies to advance goals outlined in the Five-Year Consolidated Plan. The proportion of CDBG, HOME, and ESG entitlement funds allocated to these areas is outlined in the table below.

The City also leverages a wide range of additional federal, state, and local funding sources for housing development and infrastructure improvements throughout the municipality. Many of these investments also support the identified priority areas; however, they are not reflected in the allocation percentages below as they fall outside HUD entitlement funding. As a result, the City’s overall level of investment in these priority areas is significantly greater than the percentage distribution of HUD entitlement funds alone.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	2
Old South End NRSA	4
Englewood NRSA	8
Junction Choice Neighborhood NRSA	84
Vistula Neighborhood	2

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The redevelopment and stabilization of Toledo neighborhoods are influenced by local, regional, and national economic and housing conditions. Neighborhoods that were once vibrant have been plagued by issues such as an aged housing stock, an increase in abandoned and dilapidated structures that contribute to blight, and a lack of opportunities for move-in ready homes and economic development opportunities.

For 2026-2027, approximately \$1.3 million has been allocated to various housing and service programs in the geographic priority areas. These include the three Neighborhood Revitalization Strategy Areas (NRSAs).

Activities will be implemented by Community Based Development Organizations (CBDOs) and nonprofit service agencies. The City of Toledo currently has four (4) certified CBDOs. To align the CBDO certification period with the annual CDBG funding cycle, certifications for the existing CBDOs have been extended through Program Year 2026–2027 (July 1, 2026 – June 30, 2027). The City will conduct a CBDO certification and recertification process in Fall 2026 for Program Year 2027–2028.

In the Old South End NRSA, an approved CBDO is completing an in-fill housing construction project of an approximately 1,400 sq. ft. modular home that will have 3 bedrooms and 2 bathrooms for an income-eligible household. In addition, other activities include youth services, a food access community garden, roof repair and replacement, and homeowner rehabilitation.

The Englewood NRSA will primarily focus on emergency senior home repairs, roof repairs and replacements, and homeowner rehabilitation.

In the Junction Choice Neighborhood NRSA, roof repair and replacement and homeowner rehabilitation, primarily for seniors, will be the primary focus of funded activities.

Discussion

All projects and activities funded through the CDBG, HOME, and ESG programs are intended to contribute to HUD's national goal of assisting low- to moderate- income individuals, families, households, and communities.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Toledo promotes affordable housing through a variety of programs and activities supported by CDBG, HOME, and ESG funding. During the 2026 program year, the City will distribute these funds to support affordable housing through homebuyer down payment assistance, supportive services, rental and security deposit assistance, new construction activities, acquisition and rehabilitation of existing housing units, and owner-occupied home improvements.

The project and program goals outlined in the Annual Action Plan are intended to address the housing and supportive needs of non-homeless, homeless, and special-needs households.

One Year Goals for the Number of Households to be Supported	
Homeless	20
Non-Homeless	196
Special-Needs	38
Total	254

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	20
The Production of New Units	54
Rehab of Existing Units	110
Acquisition of Existing Units	70
Total	254

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

Discussion

The demand for safe and affordable housing for extremely low-, very low-, and low-income households continue to exceed the available supply within the City of Toledo. To address this ongoing need, the City will continue exploring additional strategies and identifying activities that support its high-priority affordable housing goals.

In addition, the City is advancing other affordable housing and rental housing development efforts through collaboration and partnerships with developers to encourage both new construction and the preservation of existing affordable rental units. The City has also provided gap financing through the use of ARPA, HOME, and reallocated ERA2 funds to support these initiatives.

While it is difficult to predict the exact number of unhoused households that will receive rental assistance during the program year, the City anticipates that funding opportunities will remain available through programs such as HOME-ARP and other leveraged funding sources.

AP-60 Public Housing – 91.220(h)

Introduction

Lucas Metropolitan Housing (LMH) will pursue the following strategies and related actions in the 2026-2027 Action Plan Year:

STRATEGIES:

Continue implementing its 2024-2028 strategic plan with the following goals:

- Invest in Employee Growth and Enhance Workplace Satisfaction;
- Increase Revenue and Pursue Diverse Income Streams;
- Lead in the Effort to Create Accessible Housing Opportunities in Toledo and the Region;
- Streamline Processes and Elevate User Experience and Satisfaction;
- Launch an inclusive Communication Strategy to Educate Stakeholders and Foster Community Awareness; and
- Build Pathways to Family Income Wealth Building and Economic Advancement.

In its efforts to create accessible housing opportunities in the region, LMH will:

- Continue to pursue opportunities to reposition its portfolio to create housing opportunities in existing high opportunity neighborhoods;
- Improve neighborhood conditions to create mixed income communities of choice; and
- Transition to more sustainable and diverse funding model to support ongoing capital and operational needs.

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

LMH will continue to pursue opportunities to proceed with its portfolio repositioning strategy to maintain and modernize safe, accessible, affordable housing in the region. LMH will transform a portion of its Low-Income Public Housing portfolio using a sustainable subsidy platform available via HUD, all while keeping the units affordable at 30% AMI. It will renovate existing housing stock to address the unmet capital needs backlog and build new mixed-income communities of choice.

LMH will also expand its Energy Performance Contract by entering into a Phase II. In this phase, the savings generated in Phase I, combined with additional capital funds, will be reinvested in the Public Housing portfolio to modernize outdated mechanical systems, further improve energy performance, and increase curb appeal. This will be an investment of more than \$20 million into the Public Housing portfolio.

LMH will continue to expand the number of apartment homes available in the community through a combination of New Construction, Renovation, Acquisition, Project Based Vouchers, Project Based Rental Assistance, Housing Choice Vouchers, Capital Fund Program awards, Low-Income Housing Tax Credits and by leveraging Rental Assistance Demonstration (RAD).

- LMH intends to utilize its Faircloth limit to produce additional housing through the RAD program.
- Weiler Homes/Spieker Terrace is scheduled for pre-development work and design in 2026.

In 2025, LMH, with its non-profit affiliate & development arm, Lucas Housing Services Corporation (LHSC):

- Completed construction of Park Apartments and opened the doors to young adults 18-24 who were homeless with a disability. Park offers supportive services to provide support in the areas of mental health, job training and life skills.
- Moved towards construction completion of Collingwood Green Phase V, now known as Collingwood Green Living, a senior housing community. Scheduled to open in March 2026, 75 affordable one-bedroom units for seniors will come online.

LMH is committed to closing and beginning construction on the following projects in an effort to build new apartment homes for a variety of sub-populations of the region. Specifically, LMH will ensure the following developments are brought online as an accessible community resource:

- Mission Point – 65 apartments for chronically homeless - \$20 million investment.
- Palmer Gardens - 75 apartments - mixed income families - \$21 million investment.
- Thurgood Marshall – 54 apartments for Seniors - \$24 million investment.

Finally, LMH will continue to support its residents through a variety of different community partnerships, offering social services, benefits, case management, workforce development, and other opportunities to its residents. LMH will collaborate with local educational institutions and job training centers to provide residents with access to educational programs and vocational training that enhances their employability and economic advancement.

- LMH is collaborating with a group to create a Learning Center for cradle-to-career services in the Junction area.

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

LMH will continue to operate and expand its Financial Opportunity Center to build families' and individuals' financial capability by offering them a suite of services, including:

- Employment assistance, financial education & coaching, and access to income supports.
- One-on-one coaching and education offered at trusted community-based organizations.

LMH will also leverage its Housing Choice Voucher Program to support families that are assisted under the housing choice voucher program to use their voucher to buy a home and receive monthly assistance in meeting homeownership expenses. All LMH homeownership and housing counseling will be completed by

a HUD-certified counselor working for a HUD-approved housing counseling agency.

Through this work, LMH partners will:

- Increase the sources of financial assistance to families to make a home affordable and connect families to resources to meet down payment and closing costs.
- 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.
- Strengthen partnerships with LMH's non-profit affiliate Lucas Housing Services Corporation to increase the offer of sustainable and affordable homeownership opportunities.

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

Not Applicable. The PHA is not designated as troubled.

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

Introduction

The Toledo Lucas County Homelessness Board (TLCHB), working alongside the Continuum of Care (CoC) partners, which include the City of Toledo, remains committed to coordinating local initiatives aimed at reducing and ultimately ending homelessness. Additionally, TLCHB and CoC partners have undertaken strategic planning to revitalize and strengthen the CoC, now rebranded as Home for Everyone, along with its governance structure and CoC Board. Home for Everyone encompasses traditional homeless and housing service providers, as well as partners from various provider systems impacting and serving homeless individuals, such as the Lucas County Board of Commissioners, the City of Toledo Department of Housing and Community Development, the United Way of Greater Toledo 2-1-1, local schools, the Mental Health and Recovery Services Board, Lucas County Children’s Services, physical health providers, mental health and Substance Use Disorder (SUD) providers, workforce providers, financial opportunity providers, etc. TLCHB and CoC partners plan to refine the structure and functionality of Home for Everyone, intensify its work, and formalize processes in 2025, inclusive of the alignment of strategic documents such as the CoC Written Standards, Coordinated Entry Referral Process, and Centralized Approach to Coordinated Access and Entry. These will strategically align with the HUD TA results and CoC committee-supported developments.

TLCHB and its partners will continue to improve Homeless Management Information System (HMIS) data quality and subsequent performance evaluation tools to evaluate community needs and gaps and position future funding priorities. An open HMIS system and revised coordinated entry system, including an assessment tool, will be integral to this effort.

TLCHB has established a strategic organizational partnership with the regional housing authority, Lucas Metropolitan Housing (LMH), to enhance the effectiveness of these efforts within the Toledo community. The collaboration between TLCHB and LMH has led to innovations in local homelessness service delivery. This model integrates best practices from the U.S. Department of Housing and Urban Development (HUD) into CoC services, focusing on housing populations prioritized by the strategic plan. This will allow for the use of 123 vouchers for Housing First and Moving On efforts. The CoC will develop a Moving-On policy for implementation with these vouchers.

TLCHB and partners will leverage these new and existing structures to successfully implement the Action Plan’s goals for homeless individuals and other special needs activities. TLCHB remains actively involved in supporting and advocating for agencies and organizations aiming to develop or acquire new supportive housing for populations experiencing chronic homelessness and/or more severe service needs, including Warren Commons, Park Apartments, and Mission Point.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

TLCHB and its CoC partners will persist in orchestrating community outreach initiatives tailored for individuals facing homelessness across various sectors, such as education, mental health, substance use disorder, physical health, criminal justice and corrections, social services, housing, the workforce, and financial opportunity providers. To ensure a consistent assessment within the Coordinated Entry system, there will be a focused collaboration with United Way of Greater Toledo's 2-1-1 to identify alternative assessment and prioritization opportunities. This will be accomplished through intensive HUD workshops and collaborative efforts with the CoC Board committees, inclusive of people with lived experience.

The CoC board aims to move from a closed to an open HMIS system before the 2026-2027 program year. Currently, providers may only see information in their programs unless a specific release is provided to view information in another program. An open HMIS system will, with participant consent, allow the service provider to see the history of services, the other agencies the client is working with at any given time, and historical services to help facilitate reconnection for support when applicable. Protections and specific provisions will be made for any protected health data. This will 1) increase data quality and minimize duplication of services; 2) improve service provision efficacy as staff will have reduced data entry time; and 3) reduce trauma amongst those requesting services by not having to share their information with multiple partners.

Furthermore, specialized case management services offered through the Projects for Assistance in Transition from Homelessness (PATH) program will be employed for individuals experiencing unsheltered and/or chronic homelessness. PATH's Community Outreach Specialists possess the expertise to identify and engage with unsheltered and chronically homeless individuals, linking them to necessary services and coordinating entry for housing alternatives. The PATH program also delivers intensive, client-centric, specialized case management services, resulting in enhanced outcomes for this population. In addition, the CoC seeks to enhance Coordinated Access by employing a Coordinated Entry Navigator that can be deployed to unsheltered individuals who may not fit the PATH client criteria.

The CoC is striving to increase coordination among community partners related to outreach and homelessness. The Encampment Engagement committee has created a unique communications thread to identify and provide services to individuals without shelter. TLCHB staff coordinate regularly with the PATH and HOPE outreach teams that are connected to people living on the street, as well as the Zepf youth outreach team. The TLCHB Coordinated Entry System Coordinator is the point person to communicate between these teams, the local police department, code enforcement, and park systems staff concerning local encampments and participant engagement. These groups will continue their ongoing efforts to communicate and attempt to connect people with service and support in a respectful and dignified manner rather than just shutting down the encampment areas altogether.

Historically, the CoC has engaged in a summer PIT count. The CoC will strive to instead develop 2-3 smaller outreach events focused on encampment areas and/or specific populations to assess need and coordinate services. Heat mapping is another way the CoC is addressing the unsheltered population.

Addressing the emergency shelter and transitional housing needs of homeless persons

TLCHB and its Continuum of Care (CoC) partners will continue coordinating comprehensive community outreach initiatives for individuals experiencing homelessness across multiple systems, including education, mental health, substance use disorder treatment, physical health care, criminal justice and corrections, social services, housing, workforce development, and financial opportunity providers. To ensure consistent and equitable assessment within the Coordinated Entry (CE) system, TLCHB will collaborate closely with United Way of Greater Toledo's 2-1-1 to explore alternative assessment and prioritization approaches. This work will be supported through HUD technical assistance workshops and coordinated efforts with CoC Board committees, including the meaningful involvement of individuals with lived experience.

In advance of the 2026-2027 program year, the CoC Board intends to transition from a closed to an open HMIS system. Currently, providers can only view information within their own programs unless a specific release is obtained. Under the open HMIS model, and with participant consent and appropriate protections for protected health information, providers will be able to access a participant's service history, current agency engagements, and prior housing interventions. This change is expected to increase data quality, reduce duplication of services, improve staff efficiency by decreasing duplicative data entry, and minimize trauma for participants who otherwise must repeatedly share their information with multiple providers.

Specialized outreach and case management services will continue through the Projects for Assistance in Transition from Homelessness (PATH) program, which focuses on individuals experiencing unsheltered and/or chronic homelessness. PATH Community Outreach Specialists are trained to identify and engage unsheltered individuals, connect them to necessary services, and coordinate access to housing alternatives while providing intensive, person-centered case management to improve outcomes. To further enhance Coordinated Access, the CoC will deploy a Coordinated Entry Navigator to engage unsheltered individuals who may not meet PATH eligibility criteria, ensuring broader system coverage.

The CoC is also strengthening coordination among outreach partners. The Encampment Engagement Committee has established a dedicated communication thread to identify and respond to the needs of individuals residing in encampments. TLCHB staff regularly coordinate with PATH, HOPE outreach teams serving individuals living outdoors, and the Zepf youth outreach team. The TLCHB Coordinated Entry System Coordinator serves as the primary liaison among outreach teams, local law enforcement, code enforcement, and park systems staff to ensure coordinated, respectful engagement strategies that prioritize connection to services rather than displacement.

Historically, the CoC has conducted a summer Point-in-Time (PIT) count; however, moving forward, the CoC plans to implement two to three targeted outreach events focused on encampment areas and specific populations to better assess needs and coordinate services. Additionally, heat mapping strategies will be utilized to identify trends and geographic concentrations of unsheltered homelessness, allowing for more strategic and responsive outreach efforts.

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

The CoC is transitioning to an open HMIS system (vs. a closed system) and implementing a new assessment tool for use in Coordinated Entry (CE). The anticipated outcomes of this change will be to shorten the length of time spent being homeless due to greater access to information. While the tool may change, the process of including both the use of an assessment tool and case conferencing will be utilized by TLCHB and CoC partners to optimize program placement to meet household needs and shorten the time individuals and families experience homelessness and get sheltered or into housing options. TLCHB and CoC partners will give special assistance to chronically homeless people and families, families with children, veterans and their families, and unaccompanied minors.

With TLCHB's partnership with LMH, the CoC will provide stronger service coordination in referrals to affordable housing, housing support, and long-term housing assistance such as tenant- and project-based vouchers.

Chronically homeless people will have greater options to discover their path to being homed and the support services that can accompany their placement to meet the specific adjustments to being homed, such as mental health and substance use needs, location, workforce development opportunities, and support such as transportation options or daycare.

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

The continuation and expansion of Housing Problem Solving activities at the front end of Coordinated Entry through United Way 2-1-1 will address households at greatest risk of becoming homeless by diverting people from traditional CE resources through problem-solving conversations, referrals to community resources, and the limited use of flexible financial assistance to overcome one-time barriers.

St. Paul's Community Center's (SPCC) Organizational Representative Payee program is one effective tool that Toledo uses to help prevent homelessness with individuals who receive Social Security benefits. Individuals who have been deemed by a physician to be incapable of managing their benefits are assigned a payee to assist with paying rent and budgeting the benefits for the individual. SPCCs long history of providing a last resort payee for individuals has helped to keep more than 600 individuals per year from becoming unhoused.

Discussion

During the 2026-2027 program year, TLCHB and its Continuum of Care partners will strengthen data quality and system integration through enhancements to HMIS and coordinated entry processes. Improved data collection, transparency, and performance evaluation tools will allow the community to better assess service gaps, housing outcomes, and trends among persons experiencing homelessness and other special needs populations. These data-driven insights will inform funding priorities, resource allocation decisions, and strategic investments to ensure programs are aligned with demonstrated needs and measurable outcomes.

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

Introduction:

Historically, jurisdictions that receive federal dollars, directly or indirectly, have been required by the Department of Housing and Urban Development (HUD) to complete an Analysis of Impediments to Fair Housing Choice (AI). The AI process is prescribed and monitored by HUD and the State of Ohio's Department of Development. Specifically, to receive HUD Community Planning and Development formula grants, a jurisdiction was required to (i) certify its commitment to actively further fair housing choice; (ii) maintain fair housing records; and (iii) conduct an Analysis of Impediments to Fair Housing Choice. With the recent decision by HUD Secretary Scott Turner to terminate the AFFH Rule in February 2025, entitlement communities are no longer required to complete an AI. Rather, the city can certify that it has affirmatively furthered fair housing, in accordance with the Fair Housing Act.

The City of Toledo contracted with the Toledo Fair Housing Center to develop an AI, which was completed as the Consolidated Plan was developed. The AI reviews barriers that inhibit residents from acquiring the housing of their choice based on federal, state, and local characteristics: race, color, national origin, religion, sex, familial status, disability, military status, sexual orientation, gender identity, immigration status, and source of income. The examination looks at issues in our community through a fair housing lens, including community characteristics and demographics; income and poverty; transportation; employment; and public and private policies that impact protected groups and vulnerable populations, such as zoning, code enforcement, and real estate practices, among others.

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

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Recognizing that barriers to fair housing can be synonymous with barriers to affordable housing, The Fair Housing Center (TFHC), in partnership with the City, completed an Analysis of Impediments (AI) and developed action steps for the removal of fair housing obstacles within the Fair Housing Action Plan. The City of Toledo's 2025-2030 Analysis of Impediments and Fair Housing Action Plan outline a comprehensive set of strategies to remove or mitigate barriers to affordable housing.

In January 2025, the City of Toledo was awarded \$4 million through the Pathways to Removing Obstacles to Housing (PRO Housing) program in partnership with the Lucas County Land Bank and the Toledo-Lucas County Plan Commissions. The funding is intended to address two major barriers to affordable housing production and preservation in the City: outdated zoning regulations and weak market conditions that limit new housing development and reinvestment.

Through this initiative, the city will undertake several activities designed to support affordable housing production and neighborhood revitalization. These activities include a comprehensive update of the Toledo Planning and Zoning Code and development standards, the creation and approval of housing design templates to reduce development costs for affordable housing projects, and the provision of appraisal gap financing to encourage housing production in targeted weak-market neighborhoods, including the Geographic Target Areas of the Consolidated Plan.

As part of the PRO Housing award activities, the Plan Commission will complete a comprehensive zoning code rewrite aimed at reducing barriers to housing development and expanding opportunities for missing middle housing types. In support of these efforts, the Plan Commission has also already taken steps to modernize local development standards by removing minimum lot size requirements for buildable lots, eliminating parking minimums, and allowing for higher-density residential zoning classifications.

Additionally, the City's Department of Building Inspection and Department of Housing and Community Development have joined a consortium of cities participating in a Pre-Approved Plans Program intended to streamline housing development by reducing planning costs, permit fees, and review timelines. The Department of Building Inspection has also continued modernizing its permits processes through launch of the Permit Planner portal in 2022 and the implementation of online permit application filings in 2024.

The Residential Tax Abatement (RTA) program is designed to spur housing development and rejuvenate existing housing stock within city limits. This program offers a 100% exemption on the increased property value resulting from new home construction or significant renovations. The abatement period extends up to 12 years for renovations and up to 15 years for new construction. DHCD operates the Home At Last (HAL) homeownership assistance program, which offers homeownership assistance for eligible first-time home buyers below 80% AMI. Homebuyers are eligible for up to \$12,500 to use toward the purchase of a home and up to \$20,000 in the NRSA neighborhoods.

The Lucas County Land Bank operates the city's land bank program as authorized by city ordinance. The Land Bank operates several programs to reduce barriers, including the Adopt A Lot, Farm A Lot, and other programs for building new homes on available vacant lots and renovating existing homes in a fair, affordable way. The Adopt A Lot program reduces vacant, unused land to the benefit of the neighborhood.

These strategic actions support efforts to increase housing availability, reduce challenges that limit housing choice, and promote fair access to housing opportunities throughout Toledo, particularly for vulnerable and underserved residents.

Discussion:

For Year 2 of the Action Plan, the City of Toledo will continue efforts to address barriers to fair housing choice identified through the Analysis of Impediments (AI). The city has adopted local source of income discrimination protections and other anti-discrimination measures; however, additional work is needed to strengthen enforcement mechanisms and implementation procedures. During the program year, the city will continue evaluating policies, systems, and potential amendments to local ordinances that may improve enforcement and ensure compliance with fair housing requirements.

The city also recognizes the need to review and modernize zoning provisions related to group homes and housing opportunities for persons with disabilities. Community stakeholders, including The Ability Center, The Fair Housing Center, and Mental Health and Recovery Services Board of Lucas County, have emphasized the importance of updating zoning regulations to better align with fair housing laws and current best practices. While zoning amendments were previously considered following a Plan Commission study, no changes were ultimately adopted. The city will continue to assess opportunities to address outdated provisions and support inclusive housing policies for persons with disabilities.

As neighborhood development and revitalization activities continue, the city will work to ensure that planning and zoning decisions remain consistent with adopted neighborhood plans and community priorities. Coordination between residents, planning officials, and development stakeholders will remain important to supporting equitable and sustainable neighborhood growth.

The enforcement and implementation of the City of Toledo's lead poisoning prevention law also remains a significant fair housing priority. Housing conditions continue to present barriers to fair housing choice, particularly for low- and moderate-income households and vulnerable populations. During Year 2, the city will continue monitoring implementation efforts and evaluating staffing and resource needs necessary to support effective enforcement of the lead safety requirements.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Toledo is dedicated to fulfilling the needs of the underserved through program management and partnerships with community organizations. The city wants to help the underserved by building and preserving affordable housing, minimizing lead-based paint dangers, and reducing the number of families living in poverty through services provided by community partners and other local groups.

The city continues to explore ways to form alliances and partnerships with all sectors of the local community. The DHCD works to improve awareness and understanding of community resources and service coordination through mandatory quarterly trainings for CDBG- and ESG-funded agencies. These trainings also include presentations from the currently funded agencies, neighborhood organizations and community leaders who share local knowledge, best practices, and experiences to encourage collaboration and strengthen service delivery networks throughout the city.

During the program year, the city will continue exploring impact strategies and partnerships that encourage collaboration among locally based organizations, service providers, residents, other stakeholders. These efforts may focus on neighborhoods and geographic target areas identified in the Consolidated Plan, including the Englewood NRSA, Junction Choice Neighborhood NRSA, Old South End NRSA, and the Vistula Neighborhood. The city is interested in identifying potential pilot initiatives that leverage coordinated neighborhood-based investments and collaborative planning efforts to maximize community impact and support long-term neighborhood revitalization goals.

Actions planned to address obstacles to meeting underserved needs

The City of Toledo, like other communities across the country, faces challenges with a strong contractor pool to meet the needs of its construction and rehabilitation pipeline funded with CDBG and HOME. This is especially true for owner-occupied rehabilitation activities.

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

The awarding of tax credits from the Ohio Housing Finance Agency (OHFA) to developers building in Toledo, Lucas County, has been a challenge due to the lack of awards provided to inner-city development in Toledo. A HOME-ARP NOFA for Affordable Rental and Supportive Housing was issued July 2024. This is in hopes that a potential applicant will be successful in securing tax credits. The developers will be granted an extension if needed to allow them additional time to reapply for the 4% tax credit pool. The COT will engage with OHFA to discuss a scoring mechanism that is more equitable when considering mid-sized cities in Ohio.

Through collaboration with The Fair Housing Center (TFHC), a 2025 Analysis of Impediments (AI) to Fair Housing Choice was completed. The AI's Fair Housing Plan outlines actions that will be taken to remove barriers to fair housing. The COT and TFHC will work together, in conjunction with other local partners, to carry out the actions indicated in the Fair Housing Plan.

Actions planned to foster and maintain affordable housing

The City of Toledo will continue utilizing a variety of initiatives and funding sources, including HOME, HOME-ARP, ARPA, ERA, and CDBG programs, to preserve and expand affordable housing opportunities throughout the community. Activities identified in the Strategic Plan and Annual Action Plan support a comprehensive approach to addressing housing needs through the construction and acquisition of affordable housing units, rehabilitation and preservation of the existing housing stock, homebuyer assistance programs, and housing repair programs for the elderly and disabled residents.

The city will also continue supporting emergency rental assistance efforts and housing-related services for non-homeless special needs populations in order to promote housing stability and prevent displacement. In addition, Annual Action Plan goals include efforts to strengthen local housing development capacity by supporting nonprofit organizations and encouraging partnerships that can facilitate affordable housing development activities. These efforts may also help attract larger for-profit developers interested in developing affordable rental housing, including Low-Income Housing Tax Credit (LIHTC) projects, within the city's target neighborhoods and priority investment areas.

The city will continue to work with partners and policymakers to increase rental housing through HOME-ARP funding by providing GAP financing for 9% and 4% tax credits. The COT engaged Root Policy to develop the HOME-ARP Allocation Plan, which included contributions from key stakeholders in the city and county. The COT has continued these efforts to set forth in its HOME-ARP Allocation Plan to seek out qualified projects. In accordance with Notice CPD 21-10, the Draft Substantial Amendment to the HOME-ARP Allocation Plan was placed on public display for a period of 15 days beginning January 26, 2026 and ending February 9, 2026. The deployment of the HOME-ARP funds will continue to support one of the housing strategy goals, which is to increase access to affordable housing opportunities within the city via new construction and/or rehabilitation of single- and multi-family units.

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

The COT is allocating funds for affordable rental housing development in conjunction with developers to encourage new construction and the preservation of affordable rental units in existing NRSAs and around the city. The HOME-ARP Allocation Plan and a number of other initiatives are used to promote and sustain affordable housing in Toledo.

Actions planned to reduce lead-based paint hazards

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

Toledo has conducted lead clearance work for over 30 years, beginning with its first Lead Hazard Control grant in 1995. The city leverages funding from HUD, Ohio Department of Development, and Lucas County Regional Health Department EPA settlement funds. Funded activities include but are not limited to: education, training, inspections, risk assessments, lead hazard control/abatement, and lead clearances.

Current Active Grants:

- HUD OHLHD0575-25: awarded 12/11/2025, 48-month period of performance beginning 03/02/2026
- Ohio Department of Development: Ends 6/30/2026 (30–60-day close-out)
- Lucas County EPA settlement funds: Ends 3/25/2027

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

DHCD and Lucas County Regional Health Department maintain a local lead-safe registry at toleadoleadsafe.com, featuring rental units with Lead Safe Certificates per the City's Lead Safe Ordinance. Owner-occupied units are excluded from the registry as they do not require certification.

The City updated its Lead Safe Ordinance as of April 22, 2025 and it is currently being implemented for phased enforcement based on a schedule of priority Census Tracts. Property owners are being notified in accordance with this schedule. Once the first compliance deadline passes, enforcement actions will begin for properties that have not yet met the lead-safe certification requirements as outlined in the ordinance.

The administrative, review and enforcement functions of the ordinance were transitioned to the City of Toledo as of September 19, 2025. The City's communications plan involves direct mailing to property owners, billboards, radio ads, and print advertisements running across the city to raise awareness and to facilitate compliance.

Actions planned to reduce the number of poverty-level families

The objectives of this Annual Action Plan are to reduce the number of low-income individuals or families experiencing housing and economic challenges within the City of Toledo. Through programs administered by the Department of Housing and Community Development, low- and moderate-income residents will continue to have access to a variety of housing and community development initiatives designed to improve quality of life and expand economic opportunity.

The city's housing and community development programs are intended to support long-term household stability and neighborhood revitalization by promoting economic development opportunities, increasing housing stability, improving health and safety conditions, expanding access to sustainable homeownership opportunities, and strengthening overall community development efforts throughout Toledo's neighborhoods.

Actions planned to develop institutional structure

The DHCD recognizes the necessity of maintaining strong collaboration and coordination with other City departments, public agencies, and community groups in order to effectively implement HUD-funded programs and maximize community impact. The city will continue coordinating activities and initiatives with a broad range of community partners, including:

- Toledo Lucas County Homelessness Board (TLCHB)
- Toledo - Lucas County Plan Commissions
- United Way of Greater Toledo
- Lucas Metropolitan Housing (LMH)
- Mental Health and Recovery Services Board of Lucas County
- Lucas County Board of Developmental Disabilities
- Ohio Means Jobs/Lucas County
- Lucas County Land Reutilization Corporation (Land Bank)
- Toledo - Lucas County Health Department
- Toledo - Lucas County Port Authority

Each partner contributes specialized expertise, services, and resources that support the city's efforts to address housing, homelessness, economic development, supportive services, and neighborhood revitalization needs. Continued collaboration among public agencies, housing providers, nonprofit organizations, foundations, faith-based institutions, neighborhood organizations, and private sector stakeholders remains critical to improving outcomes for low- and moderate-income residents and underserved populations.

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

The city will continue to collaborate with a diverse range of governmental, private, faith-based, and community organizations to assess the needs of its residents. The city will continue to collaborate with the CoC and the community to streamline public service agency actions and improve the lives of all Toledo residents. These organizations handle a wide range of family issues, including homelessness, workforce development, and community health.

Discussion:

The City of Toledo will continue pursuing comprehensive strategies to address community and economic development challenges through the effective use of CDBG, HOME, and ESG funding. These resources remain critical tools for supporting housing, neighborhood revitalization, public services, and economic development activities that contribute to a stable and diverse quality of life for residents. However, the city continues to face challenges related to limited funding and resources needed to fully address the growing level of community need.

Program Specific Requirements

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

Introduction:

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

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	\$1,616,000
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	\$1,616,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)**

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

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

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

Recapture Provision

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

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

Recapture Formula

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

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

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

Resale Provision

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

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

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

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

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

Foreclosure

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

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

HOME funds will not be used to refinance existing debt secured by multifamily housing.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not Applicable

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not Applicable

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

All HOME-ARP applicants will be placed on a waiting list with a preference for (Qualifying Population 1): Homeless (1), (2), (3) is the Preference) and the others will be based on chronological order of completed submission.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

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

Written standards are contained within the five documents listed below:

- OH-501 Toledo/Lucas County CoC Written Standards for Service Delivery
- HMIS Consolidated Policies
- Coordinated Entry Referral Process
- Collaborative Governance of Coordinated Assessment
- Centralized Approach to Coordinated Access/Entry

See ESG Attachments for these documents. With the anticipated 2026 CoC NOFO, it is expected that these documents will have approvals on updates before the 2026-2027 program year. The collaborative governance for coordinated assessment and centralized approach to Coordinated Access/entry were revised and implemented in December 2025. Key performance indicators, HMIS Consolidated Policies, and the Coordinated entry referral process will be reviewed and voted on in February 2026. The updated policies will be adopted as of March 1, 2026, and fully implemented by June 2026.

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

The CoC has established, implemented, and consistently follows a Coordinated Entry System (CES) to ensure prioritized access to available resources within the local homelessness crisis response system. This system enables CoC partners to make fair and consistent decisions, connecting individuals with interventions to swiftly end their homeless episode. People at risk or experiencing homelessness can access the CES through various pathways, ultimately leading them to a centralized access point for screening, diversion, referrals to temporary shelter, and housing assessments. While United Way 2-1-1 acts as the main access point, the local, Substance Abuse and Mental Health Services Administration (SAMHSA) funded PATH Team conducts outreach for unsheltered individuals and connects them to 211.

Once a household with housing instability has cleared the initial screening for safety concerns, the call is elevated to Coordinated Access (CA) specialists for Housing Problem Solving for diversion and homelessness prevention components. The 211 CA staff are trained to administer the housing prioritization assessment. Households are then referred to available emergency shelter or housing navigation providers. Households remain in the Coordinated Access program until a solution is determined.

Coordinated Access specialists maintain a waitlist and, at the time of a bed opening, use the order of priority from the housing prioritization assessment to offer shelter or other available options. The Coordinated Access portion of the Coordinated Entry System covers 100% of the CoC geographic area in Lucas County plus Wood and Ottawa Counties.

The CoC uses a prioritization assessment tool (PAT) to determine housing assistance levels. The PAT is completed with the household by a case manager, coordinated access specialist, or other professional trained by the CoC. The PAT produces a standardized score that correlates to a referral for housing programs. Client choice and feedback from case management can also be considered to ensure all referrals are person-centered.

All community assessment scores and information are given to TLCHB's Coordinated Entry System Coordinator to be compiled into a common Community Eligibility Pool. The Coordinated Entry System Coordinator focuses on speedy referrals to housing programs through eligibility pool meetings and voucher applications. Biweekly eligibility pool meetings occur with case managers and housing providers to determine placement and provide a warm handoff to the housing provider.

Within the CoC, there are a range of housing programs available to persons experiencing homelessness: Rapid Rehousing, Supportive Housing, Transitional Housing, Group Homes, Public Housing Vouchers, and private landlord leases. The CoC honors participant choice in its housing referrals and seeks to work with the lowest-barrier housing providers and landlords available to decrease the amount of time a household experiences homelessness.

The Home for Everyone (HFE) Continuum of Care (CoC) utilizes committees responsible for providing feedback on the Coordinated Entry System (CES) and developing strategies for improvement. The HFE CoC has reconstructed the CES with feedback from people with lived experience and by recommendations made by C4 consultants during the 2024 CES Evaluation. A new prioritization assessment, a move to Open HMIS, and common language were the three main focuses of the CES improvement plan. The CoC seeks to increase outreach activities for the increasing unsheltered population during the 2026-2027 program year.

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

The TLCHB, in partnership with the DHCD, engages the following process:

- Policies and procedures for the local application process are established, including general instructions, a local competition timeline, threshold criteria, application questions, and scoring criteria or points available for each section of the application. Additionally, the local application requires that each applicant certify that the organization will incorporate person-centered principles, participate in HMIS, and fully participate in the Coordinated Entry System.
- A mandatory application training session is held prior to application release. The meeting is

widely publicized, including postings on the TLCHB website and social media pages and direct invitations to current grantees and providers within the Home for Everyone CoC membership.

- A Citizens Review Committee (CRC) comprised of community representatives is identified, recruited, trained, and engaged in determining application priorities, processes, scoring, and selection.
 - Completed applications are submitted within a specific timeframe and are reviewed, ranked, and recommended (or not) for funding by the CRC. Applicants engage the CRC in an in-person interview by providing a 10-minute presentation of funded programs to the CRC and answering any relevant questions about their request(s) for funds.
 - The CRC votes on funding recommendations to be submitted to the DHCD for final selection and recommendations to the Mayor of Toledo and the City Council.
 - DHCD notifies agencies of funded program(s).
 - TLCHB monitors agency programs for grant compliance and reports to DHCD.
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

A written obligation within third-party contracts with TLCHB and the DHCD provides guidance to achieve this expectation and is monitored by both TLCHB and the DHCD. ESG-funded agencies are required to have a formerly homeless representative on their boards. TLCHB will meet this obligation through a board appointment from the City of Toledo. Recommendations and/or nominations from the constituency are preferred. Five (5) seats on the CoC HFE Board are specifically designated for people with lived experience, including two (2) youth representatives age 18-24.

The Community subcommittee of the No Barriers Housing Committee for the HFE CoC facilitates focus groups to engage people with lived experience and to gain a better understanding of the homeless community's perspectives on homeless services in Lucas County. The Youth Advisory Board (YAB) also meets monthly to provide guidance on services for individuals 18-24 years old. In 2026, the YAB will participate in both a local and statewide system mapping of youth programs.

5. Describe performance standards for evaluating ESG.

In September 2022, the local Continuum of Care (CoC) introduced updated performance standards for agencies receiving funding. Not all program types have suggested targets for every performance indicator; some have specific targets for special populations, either in lieu of or in addition to overall targets. This aligns with HUD's Interim Rule, which emphasizes "performance targets appropriate for the population and program type." Target indicators are categorized based on the National Alliance to End Homelessness Rapid Re-Housing Triage Tool, which assesses three areas of housing barriers. The Key Performance Indicator list outlines recommended targets for each program type and indicator.

These performance indicators remain consistent across all funding sources. The standards set by the TLCHB for emergency shelter, transitional housing, prevention, and rapid re-housing activities are applicable to the evaluation of ESG activities. These measures are evaluated by TLCHB during monitoring visits, and snapshots of performance are provided to the DHCD quarterly. Annualized snapshots are given to the CRC for review during new application funding processes.

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

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

The City is not funding street outreach or supportive housing activities through its ESG funds. Please refer to AP-65 of this Action Plan for existing outreach, supportive housing, and assessment activities in the city within the CoC.

In November 2025, HUD released a since rescinded Notice of Funding Opportunity (NOFO) that outlined major changes to program outcomes. Once HUD decides how the NOFO will be reissued and presented, key performance indicators will change. The CoC System Performance Committee intends to have updated Key Performance Indicators in place before June 2026. Indicators related to Income, Workforce Development, and Program Requirements are anticipated indicators to be most affected by the updates. Indicators for Prevention, Outreach, and Supportive Services Only will be added for the 2026 program year.

CITIZEN PARTICIPATION

PUBLIC NOTICE

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2026 Program Year (July 1, 2026 - June 30, 2027), subject to the availability of funds from the U.S. Department of Housing and Urban Development (HUD).

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

Programs/Activities

Housing Preservation

Public Service

Neighborhood Revitalization Strategy Areas (NRSAs)

Eligible applicants: 501(c)3 organizations, other nonprofits, government agencies, and certified Community Based Development Organizations (CBDOs). **New applicants must have participated in or be registered for the Toledo Neighborhood Capacity Building Institute and must have completed a Concept Meeting with the Department of Housing and Community Development.**

NOTE: Special consideration will be given to Public Service and New Construction activities in the Neighborhood Revitalization Strategy Areas (NRSAs) when implemented by a Department of Housing and Community Development certified Community Based Development Organization (CBDO).

ESG/CDBG applications from Homeless Service Providers will be considered, with funding prioritized for the following project components.

Project Components

Access and Prevention (AP)

Emergency Shelter (ES)

Rapid-Rehousing (RRH)

Permanent Supportive Housing (PSH)

Transitional Housing (TH)

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

Projects

Construction/Rehabilitation of Homebuyer Units (non-CHDO)

Construction/Rehabilitation of Homebuyer Units (CHDO)

HOME Owner Program Management

* Please note, for projects with construction components:

- Applicants must comply with all relevant Prevailing Wage laws, including but not limited to Toledo Municipal Code Section 187.2(b). Contractors and subcontractors will be required to pay prevailing wages and submit certified payrolls to the City of Toledo weekly for all labor performed on the project. To view current prevailing wage rates, please create an account with the Ohio Department of Commerce.
- Applicants must comply with Toledo Municipal Code Section 187.12(d), which requires awardees of a public improvement contract of \$100,000 or greater, which is funded by the City of Toledo or other sources that do not exclude Project Labor Agreements ("PLA"), to enter into a PLA with the Northwest Ohio Building and Construction Trades Council ("NWOBTC").
- A performance bond may be required for construction contracts, equal to 100% of the construction contract.

ATTENDANCE AT THE MANDATORY APPLICATION MEETING IS REQUIRED TO APPLY FOR FUNDING AND RECEIVE THE APPLICATION LINK:

Community Development Block Grant (CDBG)

(for Non-Homeless Service Providers)

Friday, January 9, 2026

9:30 a.m. - 11:30 a.m.

Toledo/Lucas County Public Library

Large Glass Community Room

325 N. Michigan Street

Toledo, OH 43604

Emergency Solutions Grant (ESG)

(for Homeless Service Providers)

Friday, January 9, 2026

1:00 p.m. - 3:00 p.m.

Toledo/Lucas County Public Library

Large Glass Community Room

325 N. Michigan Street

Toledo, OH 43604

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

Wednesday, January 21, 2026, 10:00 a.m. - 2:00 p.m.
Department of Housing and Community Development
One Government Center, Suite 1800
Downtown Toledo, Jackson & Erie Streets

CDBG Application Zoom Training

Thursday, January 22, 2026, 9:00 a.m. - 11:00 a.m.

Applicants will receive the meeting link after attending the Mandatory Application Meeting.

ESG Application Zoom Training

Thursday, January 22, 2026, 1:00 p.m. - 3:00 p.m.

Applicants will receive the meeting link after attending the Mandatory Application Meeting.

HOME NOFA Workshop

Friday, January 23, 2026, 1:00 p.m. – 3:00 p.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/82298371798>

THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS
FRIDAY, FEBRUARY 6, 2026 AT 4:45 P.M.

THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS
FRIDAY, FEBRUARY 6, 2026 AT 4:45 P.M.

COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOMGRANTS

FOR CDBG/ESG: For additional information, please contact Monica Brown, Community Planning and Development Grants Manager, at monica.brown@toledo.oh.gov

FOR HOME: For additional information, please contact Steven Powell, Housing Manager, at steven.powell@toledo.oh.gov

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

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- A performance bond may be required for construction contracts, equal to 100% of the construction contract.

ATTENDANCE AT THE MANDATORY APPLICATION MEETING IS REQUIRED TO APPLY FOR FUNDING AND RECEIVE THE APPLICATION LINK:

**Community Development Block Grant (CDBG)
(for Non-Homeless Service Providers)**

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9:30 a.m. - 11:30 a.m.

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Large Glass Community Room
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Toledo, OH 43604

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(for Homeless Service Providers)**

Friday, January 9, 2026
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HOME NOFA Workshop

Friday, January 23, 2026, 1:00 p.m. - 3:00 p.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/82298371798>

**THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS
FRIDAY, FEBRUARY 6, 2026 AT 4:45 P.M.**

**THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS
FRIDAY, FEBRUARY 6, 2026 AT 4:45 P.M.**

COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOM GRANTS

FOR CDBG/ESG: For additional information, please contact Monica Brown, Community Planning and Development Grants Manager, at monica.brown@toledo.oh.gov

FOR HOME: For additional information, please contact Steven Powell, Housing Manager, at steven.powell@toledo.oh.gov

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PUBLIC NOTICE

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2026 Program Year (July 1, 2026 - June 30, 2027), subject to the availability of funds from the U.S. Department of Housing and Urban Development (HUD).

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

Programs/Activities
Housing Preservation
Public Service
Neighborhood Revitalization Strategy Areas (NRSAs)

Eligible applicants: 501(c)3 organizations, other nonprofits, government agencies, and certified Community Based Development Organizations (CBDOs). **New applicants must have participated in or be registered for the Toledo Neighborhood Capacity Building Institute and must have completed a Concept Meeting with the Department of Housing and Community Development.**

NOTE: Special consideration will be given to Public Service and New Construction activities in the Neighborhood Revitalization Strategy Areas (NRSAs) when implemented by a Department of Housing and Community Development certified Community Based Development Organization (CBDO).

ESG/CDBG applications from Homeless Service Providers will be considered, with funding prioritized for the following project components.

Project Components
Access and Prevention (AP)
Emergency Shelter (ES)
Rapid-Rehousing (RRH)
Permanent Supportive Housing (PSH)
Transitional Housing (TH)

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

Projects
Construction/Rehabilitation of Homebuyer Units (non-CHDO)
Construction/Rehabilitation of Homebuyer Units (CHDO)
HOME Owner Program Management

* Please note, for projects with construction components:

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Applicants must comply with Toledo Municipal Code Section 187.12(d), which requires awardees of a public improvement contract of \$100,000 or greater, which is funded by the City of Toledo or other sources that do not exclude Project Labor Agreements ("PLA"), to enter into a PLA with the Northwest Ohio Building and Construction Trades Council ("NWOBTC").

A performance bond may be required for construction contracts, equal to 100% of the construction contract.

ATTENDANCE AT THE MANDATORY APPLICATION MEETING IS REQUIRED TO APPLY FOR FUNDING AND RECEIVE THE APPLICATION LINK:

Community Development Block Grant (CDBG)

(for Non-Homeless Service Providers)
Friday, January 9, 2026
9:30 a.m. - 11:30 a.m.
Toledo/Lucas County Public Library
Large Glass Community Room
325 N. Michigan Street
Toledo, OH 43604

Emergency Solutions Grant (ESG)

(for Homeless Service Providers)
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1:00 p.m. - 3:00 p.m.
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Large Glass Community Room
325 N. Michigan Street
Toledo, OH 43604

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Wednesday, January 21, 2026,
10:00 a.m. - 2:00 p.m.
Department of Housing and Community Development
Orie Government Center,
Suite 1800
Downtown Toledo, Jackson & Erie Streets

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Thursday, January 22, 2026,
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One Government Center, Suite 1800
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Brown, Monica

From: Thorpe, Susan
Sent: Tuesday, November 18, 2025 9:16 AM
To: Fitzgerald, Anna Marie; Anne Bauman; 'anneruch@gmail.com'; Linda Arrington; Believe Ctr. Believe Ctr.; Debra (Debbie) Seeger; Erin McPartland; Taylor Burciaga; 'es_maverick@hotmail.com'; 'frankt@co.lucas.oh.us'; 'gcommu8708@bex.net'; 'gthomas@toledofhc.org'; 'jacksonv@co.lucas.oh.us'; 'janellematson@compassionhealthtoledo.org'; Janet Carter; 'jb_sqacc@yahoo.com'; Jennifer Jarrett; Jason Mueller; Karim Baroudi; 'kclark@pathwaytoledo.org'; 'ismigielski@theartscommission.org'; Marc Folk; MLK KITCHEN FOR THE POOR, INC; Harvey Savage; Doni Miller; 'pageelaine1@aol.com'; Robert Jordan; 'rshields@nhainc.org'; Stone, Robin; 'scrabtree@ablelaw.org'; s douglas; 'stokest@co.lucas.oh.us'; 'tbouyack@nhainc.org'; t pence; Martinez, Veronica; vinny Riccardi; 'wbarrow@pathwaytoledo.org'; David; Wendi Huntley; Yvonne Dubielak; 'abdul.hamadeh@unitedwaytoledo.org'; 'grantwriter@spcc-toledo.org'; Julie Embree; Joe Habib; John Irwin; Jennifer Jacobs; Jennifer Seibel; Lisa Pengov; Lesley Watson; 'matt.morris@unitedwaytoledo.org'; 'mburda@lfhtoledo.org'; Ruth Ann Petroff; 'jcordella@historicsouth.org'; Wendy Pestrue; 'jmontague@cherrystreetmission.org'; 'cathy@believecenterinc.com'; Morgan Thomas; 'johnnyhorn1974@gmail.com'; alison kuntz; 'Claudia Witkowski'; Rachel Gagnon; 'sarah.ryley@toledogrows.org'; 'csavage@pathwaytoledo.org'; 'cwagner@historicsouth.org'; Sandra De Steno; Johnathan Nichols; 'gardens.sqacc@gmail.com'; Erin Tupper; Mueller, Mikayla; ckurtz@historicsouth.org; Mike Anderson; Shelly Bartlett; Terri Rodriguez; Traci Jaksetic; Jeanette Hrovatich; Nina Corder; Annora Harbick; Brian Green; Jaime Johnson; smanns; Libby Schoen; Sam Melendez; Cynthia Shackelford; 'aebbert@cherrystreetmission.org'; pyhernandez@lawolaw.org; Logyn Thompson; smjones@co.lucas.oh.us; Laura Genalo; ngray@theartscommission.org; Chantell Cargile; Carrie Arnold; ttye@spcc-toledo.org; lisah@womenoftoledo.org; k Clink; Denise Fox; 'michaelj@auroraprojectinc.org'; NEIGHBORWORKS TOLEDO REGION; amyc@thatneighborhoodchurch.com; lisah@womenoftoledo.org; ehernandez@believecenterinc.com
Cc: Brown, Monica; Knighten, Drenda; Perkins, Roshona
Subject: PY-2026 CDBG/ESG/HOME Application Public Notice
Attachments: PY2026 Application Public Notice-.docx
Importance: High
Follow Up Flag: Flag for follow up
Flag Status: Completed

Good morning,

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

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

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Brown, Monica

From: Thorpe, Susan
Sent: Tuesday, November 18, 2025 9:24 AM
To: DAVID JOHNSON; djohnso12@yahoo.com
Cc: Brown, Monica; Knighten, Drenda; Perkins, Roshona
Subject: PY-2026 CDBG/ESG/HOME Application Public Notice
Attachments: PY2026 Application Public Notice-.docx

Importance: High

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HOME > NEWS > NOTICE OF FUNDING AVAILABILITY: COMMUNITY DEVELOPMENT BLOCK GRANT, EMERGENCY SOLUTIONS GRANT, AND HOME INVESTMENT PARTNERSHIP PROGRAM

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Notice of Funding Availability: Community Development Block Grant, Emergency Solutions Grant, and HOME Investment Partnership Program

📅 Monday, December 01, 2025

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Note: These funds are subject to the availability of funds from the U.S. Department of Housing and Urban Development.

Jump to: [CDBG](#) | [ESG](#) | [HOME](#)

Community Development Block Grants

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Public Service
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Mandatory Application Meeting for CDBG Non-Homeless Service Providers

When: January 9, 9:30 - 11:30 a.m.

Where: Toledo Lucas County Main Library, Large Glass Community Room

Open Office Hours for New CDBG Applicants

If you have never applied for a CDBG opportunity, we can help! Bring your **completed application** to the office-hours session.

When: January 21, 10 a.m. - 2 p.m.

Where: Housing and Community Development Department
One Government Center, Suite 1800

CDBG Application Training Session

When: January 22, 9 - 11 a.m.

Applicants will receive Zoom link after attending the mandatory application meeting.

Applications must be submitted via Zoomgrants by 4:45 p.m. on February 6, 2026.

For more info, contact monica.brown@toledo.oh.gov

HOME Investment Partnership Program

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Construction/Rehabilitation of Homebuyer Units (non CHDO)

Construction/Rehabilitation of Homebuyer Units (CHDO)

HOME Owner Program Management

HOME Application Training

When: January 23, 1 - 3 p.m.

Where: [Zoom](#)

Applications must be submitted via Zoomgrants by 4:45 p.m. on February 6, 2026.

For more info, contact steven.powell@toledo.oh.gov

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- Enter into a Project Labor Agreement with the Northwest Ohio Building and Construction Trades Council for any contract \$100,000 or larger.
- Secure a performance bond (when required).

Emergency Solutions Grants

Emergency Solutions and Community Development Block Grant applications from Homeless Service Providers will be considered, with funding prioritized for the following project components.

Access and Prevention

Emergency Shelter

Rapid Rehousing

Permanent Supportive Housing
Transitional Housing

Mandatory Application Meeting for ESG Homeless Service Providers

When: January 9, 1 - 3 p.m.
Where: Toledo

ESG Application Training Session

When: January 22, 1 - 3 p.m. Applicants will receive Zoom link after attending the mandatory application meeting.

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One Government Center
640 Jackson Street, Toledo, OH 43604



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Brown, Monica

From: Rachel Hart <rachel.hart@toledo.oh.gov>
Sent: Tuesday, December 30, 2025 4:50 PM
To: Brown, Monica
Subject: For Release: CDBG and ESG Mandatory Application Meetings in January

[View Online](#)



News Release

Media Contact

Rachel Hart: 419-344-2353

December 30, 2026

TOLEDO, OH – The City of Toledo announces the **availability of federal funds** for Community Development Block Grant (**CDBG**), Emergency Solutions Grant (**ESG**), and HOME Investment Partnership Program (**HOME**) for the **2026 Program Year** (July 1, 2026 - June 30, 2027), subject to the availability of funds from the U.S. Department of Housing and Urban Development.

Attendance is required at the mandatory application meetings in order to apply for funding:

Mandatory Meeting for CDBG Non-Homeless Service Providers

When: January 9, 2026, 9:30 - 11:30 a.m.

Where: Toledo Lucas County Main Library, Large Glass Community Room

Mandatory Meeting for ESG Homeless Service Providers

When: January 9, 2026, 1 - 3 p.m.

Where: Toledo Lucas County Main Library, Large Glass Community Room

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

- Housing Preservation
- Public Services
- Neighborhood Revitalization Strategy Areas (NRSAs)

Eligible applicants: 501(c)3 organizations, other nonprofits, government agencies (Government Entities/Quasi-Government Agencies (Not-For-Profit), and certified Community Based Development Organizations (CBDOs). **New applicants must have participated in or be registered for the Toledo Neighborhood Capacity Building Institute and must have completed a Concept Meeting with the Department of Housing and Community Development.**

ESG/CDBG applications from Homeless Service Providers will be considered, with funding prioritized for the following project components:

- Access and Prevention
- Emergency Shelter
- Rapid-Rehousing
- Permanent Supportive Housing

- Transitional Housing

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

- Construction/Rehabilitation of Homebuyer Units (non-CHDO)
- Construction/Rehabilitation of Homebuyer Units (CHDO)
- HOME Owner Program Management

Please note, for projects with construction components:

- Applicants must comply with all relevant Prevailing Wage laws, including but not limited to Toledo Municipal Code Section 187.2(b). Contractors and subcontractors will be required to pay prevailing wages and submit certified payrolls to the City of Toledo weekly for all labor performed on the project. To view current prevailing wage rates, please create an account with the Ohio Department of Commerce.
- Applicants must comply with Toledo Municipal Code Section 187.12(d), which requires awardees of a public improvement contract of \$100,000 or greater, which is funded by the City of Toledo or other sources that do not exclude Project Labor Agreements ("PLA"), to enter into a PLA with the Northwest Ohio Building and Construction Trades Council ("NWOBTC").
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Open Office Hours for New CDBG Applicants

If you have never applied for a CDBG opportunity, we can help! Bring your completed application to the office-hours session.

When: January 21, 2026, 10 a.m. - 2 p.m.

Where: Housing and Community Development Department

One Government Center, Suite 1800

CDBG Application Training Session

When: January 22, 2026, 9 - 11 a.m.

Applicants will receive the Zoom link after attending the mandatory application meeting.

ESG Application Training Session

When: January 22, 2026, 1 - 3 p.m.

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HOME Application Training

When: January 23, 1 - 3 p.m.

Where: [Zoom](#)

Applications must be submitted via Zoomgrants by 4:45 p.m. on February 6, 2026.

####



One Government Center, Toledo, OH 43604

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Brown, Monica

From: Rachel Hart <rachel.hart@toledo.oh.gov>
Sent: Wednesday, January 7, 2026 12:34 PM
To: Brown, Monica
Subject: For Release: CDBG and ESG Mandatory Application Meetings in January

[View Online](#)



News Release

Media Contact

Rachel Hart: 419-344-2353

January 7, 2026

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Brown, Monica

From: Thorpe, Susan
Sent: Wednesday, January 7, 2026 1:33 PM
To: Fitzgerald, Anna Marie; Anne Bauman; Anne Ruch; Linda Arrington; Believe Ctr. Believe Ctr.; Debra (Debbie) Seeger; Erin McPartland; Taylor Burciaga; 'es_maverick@hotmail.com'; Terri Frank; 'gcommu8708@bex.net'; George Thomas; 'jacksonv@co.lucas.oh.us'; Janelle Matson; Janet Carter; 'jb_sqacc@yahoo.com'; Jennifer Jarrett; Jason Mueller; Karim Baroudi; 'kclark@pathwaytoledo.org'; 'ismigielski@theartscommission.org'; Marc Folk; MLK KITCHEN FOR THE POOR, INC; Harvey Savage; Doni Miller; 'pageelaine1@aol.com'; Robert Jordan; 'rshields@nhainc.org'; Stone, Robin; 'scrabtree@ablelaw.org'; s douglas; Tina Stokes; 'tbouyack@nhainc.org'; t pence; Martinez, Veronica; vinny Riccardi; 'wbarrow@pathwaytoledo.org'; David E. Welch; Wendi Huntley; Yvonne Dubielak; 'abdul.hamadeh@unitedwaytoledo.org'; 'grantwriter@spcc-toledo.org'; Julie Embree; Joe Habib; John Irwin; Jennifer Jacobs; Jennifer Seibel; Lisa Pengov; Lesley Watson; 'matt.morris@unitedwaytoledo.org'; 'mburda@lfhtoledo.org'; Ruth Ann Petroff; Joe Cordella; Wendy Pestrue; 'jmontague@cherrystreetmission.org'; 'cathy@believecenterinc.com'; Morgan Thomas; 'johnnyhorn1974@gmail.com'; alison kuntz; 'Claudia Witkowski'; Rachel Gagnon; 'sarah.riley@toledogrows.org'; 'csavage@pathwaytoledo.org'; Carl Wagner; Sandra De Steno; Johnathan Nichols; 'gardens.sqacc@gmail.com'; Erin Tupper; Mueller, Mikayla; ckurtz@historicsouth.org; Mike Anderson; Shelly Bartlett; Terri Rodriguez; Traci Jaksetic; Jeanette Hrovatic; Nina Corder; WOT Operation Program; Brian Green; Jaime Johnson; Senghor Manns; Libby Schoen; Sam Melendez; Cynthia Shackelford; 'aebbert@cherrystreetmission.org'; pyhernandez@lawolaw.org; Logyn Thompson; Shannon Jones; Laura Genalo; ngray@theartscommission.org; Chantell Cargile; Carrie Arnold; ttye@spcc-toledo.org; lisah@womenoftoledo.org; k Clink; Denise Fox; 'michaelj@auroraprojectinc.org'; amyc@thatneighborhoodchurch.com; lisah@womenoftoledo.org; ehernandez@believecenterinc.com; NEIGHBORWORKS TOLEDO REGION
Cc: Brown, Monica; Knighten, Drenda; Perkins, Roshona
Subject: Fw: For Release: CDBG and ESG Mandatory Application Meetings in January

Importance: High

Good afternoon,

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Please see the news release 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: Rachel Hart <rachel.hart@toledo.oh.gov>
Sent: Wednesday, January 07, 2026 12:34 PM
To: Thorpe, Susan <Susan.Thorpe@toledo.oh.gov>
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Rachel Hart: 419-344-2353

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One Government Center, Toledo, OH 43604

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PUBLIC NOTICE

2026-2027 ONE-YEAR ACTION PLAN

To all interested agencies, groups, and persons:

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The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2026-2027 program year. The Action Plan provides a description of the activities to be undertaken when using these resources and the expected results of those activities. Also, the Action Plan depicts a geographic distribution of assistance including Neighborhood Revitalization Strategy Areas (NRSAs), special needs activities, general and public housing actions, and activities specific to the 2026 52nd Year Community Development Block Grant (CDBG), 40th Year Emergency Solutions Grant (ESG), 35th Year HOME Investment Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP) (if applicable), and the 2025 Lead Hazard Reduction Grant and Healthy Homes Supplement. In addition, the Plan will contain HUD-required certifications, as well as a summary of the community input received at the public hearings regarding the Action Plan.

The Draft One-Year Action Plan will be available for review beginning **Wednesday, March 25, 2026**, 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
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website: <https://toledo.oh.gov/government/mayor>

Toledo Lucas County Homelessness Board
1806 Madison Avenue
Toledo, Ohio 43604
website: www.endinghomelessness Toledo.org

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The Fair Housing Center
1806 Madison Avenue
Toledo, Ohio 43604
website: www.toledofhc.org

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

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

Thursday, March 26, 2026, 5:30 p.m.
City Council Chambers, 1st Floor
One Government Center, Toledo, OH 43604

Thursday, April 2, 2026, 5:30 p.m.
City Council Chambers, 1st Floor
One Government Center, Toledo, OH 43604

The City of Toledo will also receive comments from the public in writing beginning **Wednesday, March 25, 2026** through **Friday, April 24, 2026**, at the following address:

CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2026-2027 ONE-YEAR ACTION PLAN
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

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The Sojourner's Truth

CLASSIFIEDS

February 25, 2026

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0010 Legal Notices

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website: www.toledolibrary.org

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

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

Thursday, March 26, 2026,
5:30 p.m.

City Council Chambers, 1st Floor
One Government Center, Toledo,
OH 43604

Thursday, April 2, 2026, 5:30 p.m.
City Council Chambers, 1st Floor
One Government Center, Toledo,
OH 43604

The City of Toledo will also receive
comments from the public in writing
beginning Wednesday, March 25,
2026 through Friday, April 24, 2026,
at the following address:

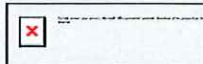
CITY OF TOLEDO
DEPARTMENT OF HOUSING AND
COMMUNITY DEVELOPMENT
2026-2027 ONE-YEAR ACTION PLAN
ONE GOVERNMENT CENTER,
SUITE 1800
TOLEDO, OHIO 43604

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tion, please contact the Office of
Diversity and Inclusion ADA coordi-
nator at (419) 245-1198 or submit a
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#674944

Brown, Monica

From: Bridget Ridley <bridget.ridley@toledo.oh.gov>
Sent: Monday, March 2, 2026 4:39 PM
To: Brown, Monica
Subject: City of Toledo Announces Public Hearings and Comment Period for Annual Action Plan Public Notice: 2026-2027 One-Year Action Plan

[View Online](#)



Media Contact

Bridget Ridley

March 2, 2026

TOLEDO, OH – The City of Toledo is seeking comments on its Draft July 1, 2026 - June 30, 2027 One-Year Action Plan to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 18, 2026. The One-Year Action Plan is based on the HUD-approved Five-Year 2025-2029 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2026-2027 program year. The Action Plan provides a description of the activities to be undertaken when using these resources and the expected results of those activities. Also, the Action Plan depicts a geographic distribution of assistance including Neighborhood

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The **Draft** One-Year Action Plan will be available for review beginning **Wednesday, March 25, 2026**, on the website of the following entities:

Department of Housing and Community Development

One Government Center, 18th Floor
Downtown Toledo, Jackson & Erie Streets
Toledo, Ohio 43604

toledo.oh.gov/housing

Lucas Metropolitan Housing

424 Jackson Street
Toledo, Ohio 43604

lucasmha.org

Office of the Mayor Toledo

One Government Center, 22nd Floor
Downtown Toledo, Jackson & Erie Streets
Toledo, Ohio 43604

toledo.oh.gov/mayor

Toledo Lucas County Homelessness Board

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Toledo, Ohio 43604

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City of Toledo

Department of Housing and Community Development

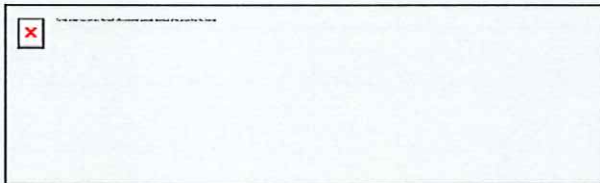
2026-2027 One-Year Action Plan

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Toledo, Ohio 43604

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Brown, Monica

From: Thorpe, Susan
Sent: Tuesday, March 3, 2026 8:46 AM
To: tfields@besnxc.org; ikinney@ecdi.org; development@ecdi.org; bharp@ecdi.org; Douglas Craven; Hayley Studer; gaylelake07@gmail.com; Libby Schoen; smanns; Sam Melendez; prestigenotary04@gmail.com; maumeebayclub@gmail.com; NEIGHBORWORKS TOLEDO REGION; Brian Green; Heather Kolar; Jaime Johnson; bob@toledotomorrow.org; rashadd@toledotomorrow.org; Suzette Cowell, CEO/Treasurer; Latoya Morgan; Gina Ritzman; Brad Toft; Emily Scheuer
Cc: Brown, Monica; Knighten, Drenda; Perkins, Roshona
Subject: Fw: City of Toledo Announces Public Hearings and Comment Period for Annual Action Plan Public Notice: 2026-2027 One-Year Action Plan
Importance: High

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You are invited to attend the public hearings on the Draft 2026-2027 One-Year Action Plan.

Please see the news release below for further details.

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

Visit us at: www.toledo.oh.gov

From: Bridget Ridley <bridget.ridley@toledo.oh.gov>
Sent: Monday, March 2, 2026 4:39 PM
To: Thorpe, Susan <Susan.Thorpe@toledo.oh.gov>
Subject: City of Toledo Announces Public Hearings and Comment Period for Annual Action Plan Public Notice: 2026-2027 One-Year Action Plan

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News Release

Media Contact

Bridget Ridley

March 2, 2026

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Brown, Monica

From: Thorpe, Susan
Sent: Tuesday, March 3, 2026 8:30 AM
To: 'aebbert@cherrystreetmission.org'; Fitzgerald, Anna Marie; Anne Bauman; Anne Ruch; Linda Arrington; Believe Ctr. Believe Ctr.; 'dhawkins@toledofhc.org'; Debra (Debbie) Seeger; Taylor Burciaga; 'frankt@co.lucas.oh.us'; 'gcommu8708@bex.net'; George Thomas; 'jacksonv@co.lucas.oh.us'; Janelle Matson; Janet Carter; 'jb_sqacc@yahoo.com'; Jennifer Jarrett; Jason Mueller; Kristie Achinger; Karim Baroudi; 'kclark@pathwaytoledo.org'; 'lsmigielski@theartscommission.org'; Marc Folk; Mike Anderson; MLK KITCHEN FOR THE POOR, INC; Harvey Savage; Doni Miller; 'pageelaine1@aol.com'; 'rshields@nhainc.org'; Stone, Robin; scrabtree@ablelaw.org; s douglas; 'stokest@co.lucas.oh.us'; 'tbouyack@nhainc.org'; t pence; Martinez, Veronica; vinny Riccardi; William Barrow Jr.; Wendi Huntley; Yvonne Dubielak; 'associatedirector@familyhousetoledo.org'; 'grantwriter@spcc-toledo.org'; Julie Embree; Joe Habib; John Irwin; Jennifer Jacobs; Jennifer Seibel; Lisa Pengov; Lesley Watson; 'mburda@lfhtoledo.org'; Ruth Ann Petroff; Joe Cordella; Wendy Pestrue; 'jmontague@cherrystreetmission.org'; cathy@believecenterinc.com; Morgan Thomas; 'johnnyhorn1974@gmail.com'; alison kuntz; 'Claudia Witkowski'; Rachel Gagnon; 'sarah.ryley@toledogrows.org'; Cynthia Savage; Carl Wagner; Sandra De Steno; 'gardens.sqacc@gmail.com'; Erin Tupper; Mueller, Mikayla; Shelly Bartlett; Terri Rodriguez; Traci Jaksetic; Jeanette Hrovatic; Nina Corder; Elaina Hernandez; amyc@thatneighborhoodchurch.com; Jillian Bunge; Carrie Arnold; Laura Genalo; jon-luke.martin@toledogrows.org; matt.morris@upicsolutions.org; abdul.hamadeh@upicsolutions.org; jessica@womenoftoledo.org; lisah@womenoftoledo.org; Kim Baker; sallen@pathwaytoledo.org; jcousino@tlchb.org; Elizabeth Masters; gabby@womenoftoledo.org; Shannon Jones
Cc: Brown, Monica; Knighten, Drenda; Perkins, Roshona
Subject: Fw: City of Toledo Announces Public Hearings and Comment Period for Annual Action Plan Public Notice: 2026-2027 One-Year Action Plan
Importance: High

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*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: Bridget Ridley <Bridget.Ridley@toledo.oh.gov>

Sent: Monday, March 02, 2026 4:39 PM

To: Thorpe, Susan <Susan.Thorpe@toledo.oh.gov>

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[View Online](#)



News Release

Media Contact

Bridget Ridley

March 2, 2026

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1st PUBLIC HEARING SUMMARY
DRAFT 2026-2027 ONE-YEAR ACTION PLAN
Thursday, March 26, 2026, 5:30 p.m.

A public notice was posted in electronic media and published in local newspapers announcing the public hearing. The public hearing was held in person inside Toledo City Council Chambers, One Government Center, 1st Floor, Toledo, Ohio 43604. The public hearing was also accessible through live stream. Those attending were given the opportunity to ask questions and provide comments. There were eleven people in attendance at the public hearing.

Monica Brown: Good evening. Sorry, we're a little delayed. If you have just walked in the door, if you could please make sure that you sign in on the sign-in sheet at the sign-in table, and we'll get started with the first public hearing. On behalf of Director Clemens who couldn't be here tonight, I want to welcome you to the first public hearing for the 2026-2027 One Year Action Plan. My name is Monica Brown, and I am the Community Planning and Development Grants Manager, or CPD Grants Manager, for the Department of Housing and Community Development. So, what I'm going to do is a brief presentation on the Action Plan and then from there, we'll have a couple of our community partners who will be up here speaking and talking about homelessness, public housing, and fair housing. So, if you're ready, we'll get started. What we'll do is we'll hold any questions until the end and then we'll get going. So, the One-Year Action Plan is a requirement of the U.S. Department of Housing and Urban Development (HUD). Each year that we have of our Five-Year Consolidated Plan, we have to submit a One-Year Plan to HUD that describes some of the activities that we would like to endeavor for the program year. The Action Plan identifies the strategic projects and performance measures that will be carried out using the community's annual HUD funding allocation. Along with that, we'll use any prior year or carryover funds to carry out these initiatives.

Projects included in the Action Plan are designed to address the needs, priorities, and goals that are established in the Consolidated Plan. If we have to make any type of changes or identify any needs – if we want to add any new projects or use any funding not previously identified – then the jurisdiction, which is us, would have to complete what's called a substantial amendment to the plan. So, what we have to do is hold a separate public hearing again to talk about the changes that we want to make, and then we have to get it approved, and so on and so forth, with HUD. For this program year, our funding application process and timeline – we had our application meeting for our Non-Homeless Service Providers and our Homeless Service Providers on Friday, January 9th, over at the library. We opened the office on January 21st for new applicants, which was for any agencies that had never received any type of funding to come into the office and get general help or guidance on their application. On January 22nd, we held an application question session. We did one in the morning for the Non-Homeless Service Providers, and then we held our second meeting for the Homeless Service Providers in the afternoon. The applications from all agencies, both Non-Homeless Service Providers and Homeless Service Providers, were due on February 6th at 4:45 p.m. Today, we are having the first public hearing on the Draft Action Plan, and then next Thursday, we'll have the second public hearing. We are planning to, hopefully, submit legislation here shortly. We did receive word from HUD that we should receive our allocations possibly by next Friday – keep your fingers crossed with everything going on in the Administration – that does happen. If not, because next Friday is Good Friday, I am anticipating maybe the following week that we will hear what those allocations are. So, if that's the case, if we do receive our allocations from HUD, we will be submitting legislation to Council on our proposed activities and who we are recommending for funding. If everything goes accordingly, we should be able to submit that to Council, hopefully by April 14th, and there will be an agenda review meeting at 2:00 p.m. on April 14th. We will be communicating that once we find out for sure, but that's a tentative date that we have scheduled for that meeting with Council. If Council decides to – they typically will have what's called a Housing and Community Development Committee meeting in between the agenda review and then also before they make final approval of our Plan – so that can happen somewhere in between April 14th and April 21st. Then, on the 21st, hopefully, if everything goes according to what we're anticipating, we should be able to have Council pass our legislation on that date at 4:00 p.m.

We have a final date to submit our Action Plan to HUD of May 18th, and if we do get the allocations as early as they are predicting, we will have to meet that deadline of May 18th. Typically, if it's after a certain time or period in the month, they allow us sixty days in which to submit. So, last year, we didn't receive our allocations until mid-May, so we were able to hold out and not submit for up to sixty days. HUD has up to

forty-five days after we submit our Plan to review and approve it, and if they have not completed that review in the forty-five days, the system will automatically approve our Plan, so, hopefully, they'll approve it and we won't have any changes to it. The Citizen Review process – we work off our Citizen Participation Plan that we developed and had to get approved by HUD, and it's a comprehensive strategy for engaging our residents and stakeholders in our planning and implementation of our housing and community development activities. There was a thirty-day comment period that started yesterday, Wednesday, March 25th, and that runs through April 24th. The Action Plan is posted on the City's website. It's also available at the public libraries, so if you want to review it and make comments on it, you can do so at that time. We do have to hold two public hearings – this is the first one, and then our second one will be next Thursday. The public hearings and the comment period are promoted through a campaign that includes public notices, a press release, website posting, and there are also some social media updates, including Facebook, and other email notifications that are sent out to our community partners and other organizations. We make all of our public hearings accessible to accommodate individuals with disabilities, and then we also have a virtual option if that is necessary.

The Citizen Review Committee (CRC) – we work with two of them. Each year, the nonprofits serving low-to-moderate individuals are eligible to apply for our funding. The application process is a very competitive process, and we use two Citizen Review Committees to vet the applications, so we have one that is for our Homeless Service Providers, and then we also have one that is for our Non-Homeless Service Providers. They work in coordination with our Internal Review Committee to evaluate all the applications, they participate in agency interviews, and then they also provide the funding recommendations for our Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) programs. So, this committee serves as an advisory to the Mayor's office, our department, and to City Council. They are different volunteers that work in the community, they live in the community, they own businesses in the community, or they also represent the interests of our low- to moderate-income individuals. For our Non-Homeless CRC, we had representatives from the ProMedica Ebeid Center, John Henry Eldred, Jr. Foundation, Lucas County Department of Job and Family Services, the Toledo Lucas County Public Library, Toledo Public Schools, TARTA, and a private consultant. For our Homeless Services, our CRC representatives included our Continuum of Care Chair, a representative from Anne Grady, NAMI Greater Toledo, Team Recovery, the Criminal Justice Coordinating Council, Toledo/Lucas County CareNet, Toledo Lead Resource Center, the YMCA of Greater Toledo, the Mental Health and Recovery Services Board of Lucas County, and Lucas Metropolitan Housing (LMH).

In the application process and timeline, there's an initial application and orientation process, and there's a mandatory meeting that all applicants have to attend. The application submission – they have a deadline in which to submit the application, which as I indicated earlier was February 6th. We do not accept any late or incomplete applications, and we won't consider them for funding if they are late or incomplete. The application review process, again, is undergone by an initial review from our Internal Review Committee to ensure completeness and some eligibility requirements, followed by the Citizen Review Committee who conduct their final evaluation. As a part of this process, applicants are required to participate in interviews with the Citizen Review Committee to support their overall funding assessment. The citizen review and recommendations – once we do the final interviews, the CRC convenes again to deliberate and develop their funding recommendations. These recommendations are submitted to the director of our department for her final administrative review and approval. After that, it has to go before Council for recommendations, as well as the Mayor, and then final approval from Council.

The minimum requirements for the applicants – they have to be a 501(c)3 for at least two years in operation. We do allow government agencies, or government entities to apply, other nonprofits in operation at least two years, certified Community Based Development Organizations (CBDOs), our homeless service providers, and then any other agency that can show the capacity to implement any proposed activity or project. Some of the criteria that is reviewed includes the agency's financial stability; board of director's composition; project budget and leverage, including the one-to-one match, because all agencies are required to have a one-to-one dollar match for any funding that they seek; their activity impact for the community; and also organization, capacity, and past performance.

For the 2026-2027 application for the CDBG Homeless and Non-Homeless Service Providers, we received 34 applications from Non-Homeless Service Providers. The request amount totaled \$4.5M. For the HOME Investment Partnerships Program (HOME), we received one application for homebuyer development, and that was \$400,000.00. For ESG, we received nine applications for a total of \$1.3M. Everything is based off what we

received for the 2025-2026 program year. We're anticipating level funding from HUD, which they indicated we should be receiving. For 2026, we're basing everything off \$7,046,960.00. We do have some carryover money in the amount of \$1.8M, so the total resources that we're looking at for the 2026-2027 program year for CDBG is \$8.9M. For HOME, we are looking at \$1,965,724.00. We do have about \$5M in carryover, so we're looking at total resources of about \$6.9M for HOME. For ESG, which is our smaller pot of money, we are looking at about \$627,000.00 that we'll receive in those dollars. As long as they are doing level funding, this is what we're hoping we will get. Again, it could go up or down. If it goes down, it could be because there are other entitlement cities that have applied and were granted to become a part of this money, so that could change it. We won't know until we get the actual allocations which way it's going to go.

In the breakdown of CDBG resources for 2026-2027, \$1.4M is allocated for Planning and Administration, which equates to about 16 percent. We are allowed to allocate at least 20 percent of our funding to Planning and Administration. There's going to be about \$900,000.00 allocated for Housing Program Delivery and that's for the staff in the Division of Housing. For Public Services, \$1,057,000.00 is being allocated, which is the maximum amount we can allocate for Public Services. Per HUD requirements, we can't exceed a 15 percent CAP for Public Service activities, and that's what the CAP is. For Affordable Housing, we're allocating \$1.8M, with \$1.1M in carryover funds. For Neighborhood Parks and Community Centers, \$1M has been allocated. For Economic Development, a total of \$747,000.00 has been allocated, and for our Capacity Building Institute, \$150,000.00. We have a couple of NRSA public service activities, which are done by our Community Based Development Organizations (CBDOs) and will be allocated \$220,000.00. Our NRSA Housing activities will be allocated \$825,000.00. We're going to do some new things with Code Compliance with demolitions, and a total of \$250,000.00 has been allocated for this in the NRSA neighborhoods. We will also be doing some Strategic Economic Development in the NRSA neighborhoods for \$500,000.00. So, a total of \$8.9M will be allocated in CDBG funds for the program year.

For HOME resources, we can allocate about ten percent for HOME Administration, so that comes out to \$196,572.00. We always allocate at least 15 percent for our CHDO Set-Aside, which amounts to \$844,859.00, which includes \$550,000.00 in carryover funds. Homeowner Rehabilitation – we're using carryover dollars to fund that this year, so it will be about \$2.4M. For Rental Housing Development, \$1.4M will be allocated. For Home At Last Down Payment Assistance, we aren't using any of our actual allocation but will be using about \$1M in carryover funds to fund this program. That's the same for Homebuyer Development, which will be allocated \$1M in carryover funds. So, a total of \$6.9M will be allocated in HOME funds for the program year.

For ESG resources, a total of up to 60 percent of our total allocation can be allocated for Essential Services, which would be for emergency shelters, and that amounts to a total of \$376,225.00. For Stabilization Services, \$48,539.00 will be allocated. For Administrative Operations, \$47,000.00 will be allocated, and for HMIS, \$155,251.00. So, a total of \$627,000.00 will be allocated in ESG funds for the program year.

Neighborhood Revitalization Strategy Areas (NRSA) – A NRSA is a tool that HUD designed which allows us to target investments in our most distressed neighborhoods. It allows us better flexibility in the use of our CDBG funding for over a five-year period. It allows us to leverage private and public funding, so we don't have to use any new CDBG funds. It allows us to reallocate existing resources and it expands our housing assistance support, so we can go up to the 120 percent AMI when we are in a NRSA neighborhood. It also supports job creation/retention and depending on what that agency is doing and if it's a certified CBDO, it allows us to exceed our public services' CAP of 15 percent. Other key advantages include more reporting flexibility – it streamlines our compliance – and, again, the best part of it is that we can exceed our 15 percent public services' CAP. In Toledo, we have three designated NRSA neighborhoods including the Old South End, Englewood, and Junction. We are looking at Vistula to possibly have it as a Vistula Choice Neighborhood and if that designation goes through, then that can be designated as our fourth NRSA in the city.

That's all I have at this time. I will bring Lisa Pengov up from the Toledo Lucas County Homelessness Board (TLCHB) to talk about some of the homeless initiatives.

Lisa Pengov: Thank you and good evening. I'm here to talk about our Home For Everyone Continuum of Care. Thank you for the opportunity to speak with you today. Again, my name is Lisa Pengov and I am the Continuum of Care Systems Operations Manager. I'm going to be representing the Toledo Lucas County Homelessness Board (TLCHB) today and we want to talk about – why are we here? Tonight I want to share our

one-year action plan and what we are doing to better help people in our community who are experiencing homelessness. First, let's talk about the problem. In the past, our system had a lot of barriers. People had to tell their story over and over again to different agencies, programs didn't always share information, and sometimes people didn't get the help they needed fast enough. That made it harder for people to move out of homelessness and into stable housing. In 2024, TLCHB, with the Continuum of Care, created a strategic plan to help us move forward with our homeless services continuum. So, now, we're making important changes. We're moving to an open Homeless Management Information System (HMIS). This means, with permission, service providers can share information and see a person's history throughout time since they have become homeless. Instead of starting over each time, we can understand someone's needs faster, avoid repeating the same questions, reduce stress and trauma, and get people connected to housing more quickly. We're also introducing a new housing assessment process. This will help us better understand who needs help the most, what kind of help they need, and how we can match them with the right services. In simple terms, we will finally be able to see the full picture and respond in a smarter way. Sometimes – right now, if you call 2-1-1 and there isn't any shelter available, they tell you, I'm sorry, we'll put you on a list. We don't want to do that anymore. So, this year, we're focusing on three things. We're focusing on Coordinated Entry – help people enter the system, Key Performance Indicators – how people are doing, and Data Quality, which helps us in all areas of analyzing how we're doing and also helps us get more funding in our community.

First – Enhancing Coordinated Entry. This is the front door to our system – we're improving how people enter and move through services so it's easier, fairer, and more coordinated across all partners. We're working closely with United Way 2-1-1 and we're actively seeking out outreach teams to make sure no one falls through the cracks. Second, we're working on Key Performance Indicators. This means we're measuring what works. We will track things like how quickly people are housed, how long they stay housed, and how well programs are performing. This helps us make better decisions and use funding wisely. Third, we're looking at Data Quality – better data means better results. With improved data, we can identify real needs in our community, see trends in homelessness, and plan smarter solutions. We're also expanding important programs. In the following year, we plan to grow the HIVE program. HIVE is Housing, Integration, Visibility, and Engagement. This is a connection platform to streamline housing options for the unhoused community. Case managers can match their clients' needs with landlords that are willing to rent to our population. Right now, we have 113 properties listed in the HIVE program, which accounts for 987 units being listed across these 113 properties, and we know as of today, there are 148 units open and ready to be rented to folks out on the streets. We also want to expand the youth programs in our system so that young people experiencing homelessness get the support that they need early. Right now, we have a growing youth advisory board. These are young people aged 18-24 who have experienced homelessness and are helping to let us know what needs to happen in order to help folks that are coming out of foster care, or even just young people that no longer have supports at a young age. This youth advisory board has been helping us not only with our local system mapping, but also at the state level. Our young people are part of the youth advisory board for the State of Ohio as well.

In addition, this year, we will begin fundraising efforts to support some critical community work including the Point-in-Time counts, which help us understand how many people are experiencing homelessness each year; our Code Blue events, which provide safety during extremely cold or hot weather; and we're looking at targeted outreach events to reach people living outside. These outreach dollars will be used to focus on encampments, outreach, supplies, and system mapping. These efforts help us to meet people where they are and connect them to help. Overall, our goals are simple. We want to reduce barriers, use better data, and help people move into safe, stable housing faster. This plan allows us to better understand our homeless community, not just guesses, but real data, and create real results. That's all I have. Thank you for your time, your leadership, and your continued support in making Toledo a place where everyone has a place to call home. Again, I'm Lisa Pengov, I'm the Continuum of Care Systems Operations Manager for the Toledo Lucas County Homelessness Board. Thank you.

Monica Brown: Thank you, Lisa. Come on up, George. Next, we're going to have George Thomas from The Fair Housing Center talk.

George Thomas: I'm George Thomas; I'm the CEO and General Counsel for The Fair Housing Center. Just really quick about The Fair Housing Center and why we're here as a partner with the City. We're a nonprofit civil rights agency that promotes housing choice and creation of inclusive communities of opportunity and the

protection and expansion of fair housing rights to support strong communities. So, what does that really mean? Well, where you live, your home powerfully affects every aspect of your life, your job opportunities, educational opportunities, health, safety, etc. Fair housing rights ensure that every person can access a home regardless of their race, color, national origin, sex, religion, familial status, disability, etc., - all those classes we recognize that people may have faced discrimination and be denied housing or treated differently in housing in some way. So, if you think about it, we can build housing, we can make a lot of plans to implement housing in different ways, but if there's barriers to certain people being able to access that housing, the solution is never, ever complete, so that's where TFHC comes in as a partner with the City and as a partner of these processes. So, just about us, really quick. If you need to access our services - victims of housing discrimination should definitely contact us for assistance or anyone seeking information about fair housing laws or fair housing compliance. We get a good number of calls from real estate agents, property managers, etc. We just want to make sure they understand what they should be doing. We do a lot of trainings for housing providers and others in the community as well. We also have a program that helps tenants experiencing housing conditions issues in the area. I'll touch on that a little bit later. We provide this service in Lucas and Wood counties, and our website and phone number are on the screen there, too.

One of the things that we do for the City, too, is the AI. So, AI stands for Analysis of Impediments. What that means is that we look for barriers to fair housing choice so, when I was saying before your home is really important, it's the core of your life, but what if those barriers come in that might prevent certain folks in our community - certain marginalized populations, certain groups from accessing housing or creating a barrier in some way. So, the Analysis of Impediments tries to identify some of those issues, and then make a plan for our community, our city, and our partners, to remove those barriers. So, it begins with outreach, community surveys, focus group meetings, reviews of local history, demographics, census data, and other studies to identify barriers to fair housing choice, and then provide an action plan to eliminate those barriers identified by the community.

A few examples of barriers that were identified in the Analysis of Impediments and the kind of things that we're trying to work on included Access to Homeownership. This is really important for all cities across the country, but it is very true in Toledo. You may have heard or seen news stories, reports about - hey, Toledo is a wonderful place to invest if you're a real estate investor and to buy up houses and turn those into rental units in some way. Actually, it sounds kind of good in a way - it's a great place for investment, but think about the flip side of that - if investors are buying up a lot of the homes where people might otherwise be able to be a homeowner and pass on generational wealth to their children, it's taking that away. We want to actually see folks in our community be able to buy a home, and I will note, too, that for certain marginalized groups, it's particularly hard for them to get access to homeownership. It's becoming harder and harder with the cost of housing increasing. So, we have recommendations and the City is certainly already working on them. One example - the City is going to be doing a Homeownership Fair later this year to educate residents on access to homeownership. There's other things that we can do to improve local laws and maybe look at partnering with banks to provide better products, or making sure that if there are investors buying up a lot of housing, even local investors or sometimes they're even international, or out of state - whatever their background is though - we need to make sure our local laws are enforced and they are providing habitable housing. Hopefully, that will encourage them to sell to residents as well.

Another thing we identified that's really important is Source of Income Discrimination. That comes in a variety of different forms, but let's say someone denies someone housing because the income that they have is, let's say, Veteran's benefits or Social Security, or a housing choice voucher. Let's say, for example, a housing choice voucher, which is a very important piece to this - you should be able to live anywhere you want that your money can carry you. That voucher can pay your rent. The idea is - go to any neighborhood, go wherever you want, wherever your money can take you. However, sadly, a lot of housing providers discriminate based on that source of income. So, the City actually has a local law that prohibits that - it's a misdemeanor offense. The next phase that we're working really closely with the City is making sure that it's actually enforced and that people can file complaints with the City if they have experienced that kind of discrimination. I won't go through all the details, but there is progress being made on that.

Land Use and Zoning are almost always identified in action plans all across the country. Cities all across the country have to do these kinds of analyses and action plans. One of the things that we identified was making it a little bit easier, making sure there aren't barriers for housing for folks with disabilities because that

sometimes is difficult. As soon as there are barriers that get raised for housing for individuals with disabilities, or even just affordable housing, sometimes there's push-back, there's nimbysm. We need to make sure at the zoning phase that we eliminate that; we have recommendations for that.

I should strongly emphasize that substandard housing conditions definitely came out in the focus groups, in the surveys, and that was true for the prior Analysis that we did five years before this one. Toledo has an older housing stock – this is an older town, a lot of housing was built before 1978 and, at the same time, there's neighborhood areas that were historically redlined or disinvested in different ways, and we haven't seen the investment in those areas. So, over time, the housing stock begins to deteriorate and that then becomes a barrier to real housing choice, especially in those particular areas, so we have recommendations for fixing things.

One of the last things I'll mention is public awareness of fair housing rights and how to get involved with the action plan. That's part of the reason why we're here is to emphasize the importance of these issues in our community. Sometimes when I talk about these things, they sound kind of technical. It's about local law, and how do you enforce some of these rights? There are legal processes, but the more we can educate the community of why – people just see the results, right? They see that housing is hard to get to, they see that it's really expensive, and they see that the quality and the conditions are often bad. That's a result of a series of different local policies and state and national policies, but things that, hopefully, we can work on as a community to truly change. So, part of why we're here is to educate the community but also educate them on their fair housing rights so if they are experiencing discrimination, they know where to go and who to call. I'm happy to answer any questions if there are any, or if you want to ask questions later. Thank you.

Monica Brown: Thank you, George. We'll have Senghor Manns from Lucas Metropolitan Housing come up to talk about public housing.

Senghor Manns: Good evening, I'm Senghor Manns. I'm the Chief Executive Officer and President of Lucas Metropolitan Housing (LMH). Thank you for allowing me to speak briefly. I was asked to speak, or LMH was asked to speak just briefly as it relates to public housing, so, there are going to be a variety of different things that I'll be speaking about, but it won't necessarily be beyond public housing. There might be a few projects that I'll mention that are sort of outside of public housing, but for the most part, we're talking about public housing and not some of our other activities that are still in the affordable housing space. We have an affiliate nonprofit that does a lot of our work, so I'm not asked to necessarily talk about that, so I will not really go into that. A little bit about us – we have a vision statement, and we have a mission statement. Our vision statement is to be a lead partner in creating communities of choice where everyone has a place to call home – very similar to what the Toledo Lucas County Homelessness Board said earlier. Our mission is to be a leader in the development of sustainability of housing accessible to all and providing pathways to an enhanced quality of life to empower vibrant communities. Public Housing – just a few simple facts. We manage about 2,400 public housing apartments. We have even more than 2,400 if you expand that beyond public housing. We have some market-rate units that we manage. We also have some tax-credit units that are within our purview. We don't typically manage them, but they're controlled by us, so, it's about 2,600 total that we have some control over, so we're the largest residential landlord in the region. The number of people on our public housing waitlist is actually a little over 4,000, so it's approximately 4,000. In late Fall, early Winter, we opened our waitlist, and within three days, we had 3,500 applications so we all understand that there's a great need out there, a great demand for affordable housing. Our annual turnover rate – we have about 300 families that leave our public housing residency, and then, obviously, we try to fill those up as quickly as we can, but with a waiting list of over 4,000, you can see just the imbalance in the number of units that are needed versus the number of families that leave our communities. You can only imagine the challenge that we have here in the community. Currently, unfortunately, our waitlist is closed because 4,000, if we kept it open would be 5,000, which, of course, would be 8,000, and then on, and on, and on, so we closed it.

Our Strategic Plan was developed in 2024. It's a five-year strategic plan that ends in 2028. I've identified the various goals that we have. The goals are to invest in employee growth and enhance our workplace satisfaction. We believe it's important that we not only have good employees, but we also have the ability to recruit good employees and keep them so we have to invest in our folks, so I feel very strongly about us having a workplace in which people feel comfortable and ultimately want to stay for a sustained period of time. We also have to, at this very weird time, increase our revenue and pursue diverse ways in which to do that. We're

about 95 percent HUD funded and that means that we operate at the whims and wishes of the congressional appropriations, unfortunately, and so that means if HUD is having a very challenging year because of congress or the executive administration, i.e., the President, then that means we're going to end up having a very tough year ourselves, and so by diversifying, we actually secure ourselves financially. We want to lead in the effort to create accessible housing opportunities in Toledo and the region. We are Lucas Metropolitan Housing, so we do think more broadly outside of Toledo. I'm not going to talk about those areas in which we operate outside of Toledo, but we do think about how we can expand housing opportunities for everybody. It goes back to what George was referencing regarding choice – giving people the opportunity to choose where they want to live. We want to streamline our processes and elevate user experience and satisfaction internally. We have this saying as it relates to customer service, we say "wacteo," which is for our staff. It means that we are customers to each other, and so it's a way to remind ourselves that we all have to think about being customer-service oriented. We want to launch an inclusive communication strategy to educate our stakeholders and foster community awareness so you'll see a lot more postings on our social media platform if you're connected to us, and you'll receive a lot of information about what we're doing, how we're doing it, the people that are a part of our everyday walk, and the dynamic programs that we're offering. So, we're trying to enhance our communication through a new communication department that we started just in the middle of last year.

We're building pathways to family income wealth building and economic advancement. Homeownership is an important function, we think. George, again, mentioned that there's a wealth generation through certain ways of people making certain decisions, and one is homeownership, and so we're trying to advance our homeownership program. A lot of people don't know that our voucher program has a homeownership component to it, so, literally, a portion of your mortgage can be paid through the voucher itself. It's not a kept secret by us, but people don't really seem to take advantage of it the way that they could. So, our approach to housing in our region – LMH intends to continue to pursue opportunities to improve and reposition our portfolio to create improved living conditions and quality of housing opportunities. We want to improve neighborhood conditions to create mixed-income communities of choice, and the reason why we want to do that is we think there is a certain level of dignity in living and quality of life – people don't have to feel like they live in lower-income communities or residences. They should live anywhere with anybody in a mixed-income community and, so, as an example, some folks know, including my staff, and you'll probably see this over the course of the next year, I do not like the fact that we highlight and promote our communities as being Lucas Metropolitan communities, so that when you drive past one of our communities, you see this big yard sign, kind of like a political campaign sign in the yard that says, Lucas Metropolitan Housing on it. You don't see that in any private market community. What you see is the name of the community, right? And, maybe in small print, managed by, but you don't see this huge advertisement, and so I want our kids, I want our families to feel proud about where they live and the community in which they live. You don't have to necessarily advertise that they live in a public housing community, and so I want, also, to give them the opportunity to live in mixed-income communities. We also want to transition to more sustainable and diverse funding models, as I said before, so we can serve our capital needs.

Some of the projects we will be working on over the next year and into 2027 include Palmer Gardens, which actually is not public housing. We just acquired this property and we're going to be doing a sizeable amount of interior renovations and some exterior, but mostly interior renovations for the purpose, of course, of enhancing the quality of life for the residents who live there. McClinton Nunn, off Nebraska, you'll see over the next year some significant changes in the esthetics – the outside exteriors. We're also doing a lot of lighting work and we're going to be putting in air conditioning. You'd be surprised that some of our communities don't have air conditioning, so in the summertime, they don't have the ability to really close their windows and cool themselves off through what we're generally accustomed to doing, so there will be some significant improvements to McClinton Nunn for our families there. Vistula Manor, which is right next to us – you're going to see some exterior improvements to that particular building as well, including new windows, along with first-floor improvements that will make it a very comfortable lifestyle for those that live in that building. Port Lawrence – there will be lighting upgrades and heating valve replacements. Weiler Homes and Spieker Terrace are in the redevelopment phase. Spieker and Weiler, over the next two to three years, you'll see a lot of activity over there. We're start with Spieker – we'll probably take down Spieker and will be building new spaces for people to live in that area, and then we'll move to Weiler and do renovations and some deconcentration of poverty You can see there are 425 apartments over there – that's just a lot of units in one place, so we're going to think about how we can deconcentrate our level of low-income residency there. We're figuring out how to do some replacing and that will take a little time to figure out. Collingwood

Green Living, which is not public housing, but is a senior housing community set to open this year. The grand opening is May, I believe – May 28th, I think it is set for. We'll see if that happens, we're still working on the lease-up piece. It's just another demonstration of what can be done if a collection of groups or organizations come together and pull their resources and brain power to make that happen. Ten Eyck Towers – we will be doing some HVAC system upgrading, some lighting upgrades, and exterior work.

We have a lot more going on, but for the public housing piece for 2026, at least in Toledo for 2026 going into 2027, those are our main focus areas. The part that I think is – all of that is exciting as far as I am concerned – but part of it is us really not wanting to be needed. Part of the excitement is, hopefully, getting families to not need LMH, and so, a lot of ways in which we do this is we have a financial opportunity center, the only one, quite frankly, in the State of Ohio that's housed in a housing authority, or at least, we're the first. We do have an interest in homeownership; we do have an interest in having our residents – or you don't even have to be a resident – but having our residents become credit worthy, obtain a mortgage, being able to identify a house that they would like live in – we have Habitat for Humanity here. We have this desire, I think, among a lot of different groups to have families become homeowners, so our financial opportunity center is another method in which to help families get to that destination, and we have to thank Local Initiatives Support Corporation (LISC) because LISC actually helps the program and continues to provide some financial support for that program to continue. With that, are there any questions? Or, again, you're taking them later – okay, no problem. Thank you.

Monica Brown: Thank you, Senghor. So, we'll open it up now for questions. Do you have a question? If you have a question, do you want to step up to the podium here? State your name and ask your question.

Audience Member #1: Hi, my name is Laure Hammond, and I live in the old west end of Toledo, and I have a couple of questions regarding the NRSAs and the new residential developments that have been built, such as the Glen – the Grand. I was at the vacant housing registry press conference, and they referenced that that particular property was income-driven, but it's not, and if we're looking at housing that goes up to 120% of AMI, but the rent is starting for those units – two-bedroom at \$1,300.00. So, I am just wondering how is that considered? They're not going based on income, they're not subsidized, nothing like that. It's just out of place to me.

Monica Brown: Well, I wasn't in on that project. So, what I can do is I will get the appropriate person to reach out to you to explain that process because I'm on the CDBG side and that was done with other funding and, so, I don't know all of the details that went into how they determined the income and all of that for that particular project, but I can find out for you, and I know how to reach you. I'll make sure we get that answer for you.

Audience Member #1: I have one more question. In finding the homelessness, in finding residents – I am all for housing our homeless and, she's gone, and I guess I could reach out to her, but my question would have been – are there coaching opportunities for those individuals that are transitioning from homelessness to permanent residences where they are being checked in on, making sure that they're keeping properties up because we do have a lot of out-of-state investors that are willing to rent to a transitioning family, but they're not keeping up with the properties. I actually live right next door to a situation just as that and when I tell you that they're tearing it down, brick by brick, you know, the foundation – everything, but the owner is not keeping up with it. He has a project manager and they're just collecting the vouchers, so how do we figure out a way to transition the homeless individuals or unhoused, I'm sorry, not homeless, the unhoused individuals into permanent housing and into being more involved with their lifestyles?

Monica Brown: I know that they do provide wraparound services, you know, like case management and different things like that. I don't know the extent to what you're asking. We probably would talk to Code Compliance because they would be more involved in that as far as if there's issues – structural issues with the housing and other maintenance issues like that. We would probably need to talk to Code Compliance to get more information on how that is, but I know they do provide wraparound services. The details, the extent of it, I'm not sure, and how they do it, I think, depends on the funding and how much is allocated for helping that particular family. That would be more of a "Julie" question on the unhoused.

Audience Member #1: And I do have her contact information.

Monica Brown: I would reach out to her and she can go into more detail on that for you.

Audience Member #1: And since you mentioned Code Compliance...

Monica Brown: I'm not Code Compliance.

Audience Member #1: But you can probably direct me. But we're talking about allowing individuals to become homeowners. In the Old West End, north of Central and west of Detroit Avenue, there's a lot of properties that are being demolished, so we're left with all of this green space. I know Land Bank comes and they look at certain properties, and so on and so forth, but I know of at least one property that was in the process of being renovated and they demolished it, so how can we stop so many demolitions, and then leaving these parcels vacant for 15, 20, 25 years in some of these cases?

Monica Brown: That might have to be a coordinated effort between Fair Housing and our department...Code Compliance to initiate something like that. I know there are some planned demolitions coming up in the NRSA areas. I just found this out a couple days ago, so I don't know all the details of it yet, but I'm sure there's going to be some type of a taskforce or something that they'll look at and see how we can, instead of maybe always demolishing, maybe there might be a potential to save it, but I know there are some houses that they are looking at that they will be demolishing. What those units are, they have not provided the identification of those yet. We can talk with Director Clemens who is working with Code Compliance on that and find out.

Audience Member #1: Okay Monica.

Monica Brown: I didn't have a lot of answers, sorry. Any other questions? Yes? Go up and please state your name.

Audience Member #2: Hi Monica, Ramon Perez, and I live in the old south end of Toledo. Two real quick things. Number 1 – when they determine the NRSA designation – I think it's fantastic. Was there a profile that was built to, you know, like income, housing, age, you know, income – those kinds of things? Like a profile that was developed for the Old South End? I don't know if you or someone knows it, or is there any information available that I can get my hands on?

Monica Brown: It should be in the NRSA Plan. It has the demographics, it has the income information, but that was from 2022 – 2021 and 2022 they based that off of. So, all of that information is in the NRSA Plan that is on the City's website. So, they did an extensive study of the areas before they – because there is a long process that we have to go through in order to designate a NRSA, and so one of the things they look at is the housing, they look at the income, they look at the demographics, they look at all of that information, and all of that is available in that NRSA Plan. I don't know it off the top of my head, but it is available in it for you to review.

Audience Member #2: Yeah, just a real quick follow-up on top of that. So, the designated NRSA – it was like five years and I'm concerned that...can you stay longer than five years, or after five years or whatever the timeframe is, does that mean we're out of that additional resource support loop?

Monica Brown: No, we can recertify it every five years, so we just did that for our new five-year plan. So, it's set for the next five years and once we do our new plan again, we'll just recertify with HUD again.

Audience Member #2: I like that answer, thank you. I was taking pictures and I was thinking – well, they probably have the slide they could provide. Do you have that, or should I just hang onto the pictures that I have?

Monica Brown: If you send me an email, I can send it to you.

Audience Member #2: Thank you, ma'am. I'm all set.

Monica Brown: Thank you. Any other questions? No? I just wanted to remind you of the public comment period. The Action Plan is on the City's website. It's also available at the public library. There are three copies at the Main Library, and you can request it from another library and have it sent to you. It's also on the website of The Fair Housing Center, LMH, as well as the Toledo Lucas County Homelessness Board, and the

Lucas County Board of Developmental Disabilities – it's on their website as well. You can go in, download it, and review the Action Plan. We are doing a 30-day comment period, and it runs through April 24th. All written comments should be sent to the Department of Housing and Community Development, One Government Center, Suite 1800, Toledo, OH 43604, and just put it to the attention of 2026-2027 One-Year Action Plan – any public comments that you have. You can also email me at monica.brown@toledo.oh.gov if you have any other comments as well. So, with that, we conclude the first public hearing. The second one, again, is going to be next Thursday, April 2nd, at 5:30 p.m., and it will probably be pretty much the same presentation. Have a good night.

2nd PUBLIC HEARING SUMMARY
DRAFT 2026-2027 ONE-YEAR ACTION PLAN
Thursday, April 2, 2026, 5:30 p.m.

A public notice was posted in electronic media and published in local newspapers announcing the public hearing. The public hearing was held in person inside Toledo City Council Chambers, One Government Center, 1st Floor, Toledo, Ohio 43604. The public hearing was also accessible through live stream. Those attending were given the opportunity to ask questions and provide comments. There were four people in attendance at the public hearing.

Monica Brown: Good evening. I want to welcome you to the second public hearing for the 2026-2027 One-Year Action Plan. My name is Monica Brown and I am the Community Planning and Development Grants Manager and I want to welcome you on behalf of our Director, Rosalyn Clemens, who could not be here tonight. We're going to do a short presentation on the One-Year Action Plan followed by a couple of presentations from our partners, which include Lucas Metropolitan Housing, Toledo Lucas County Homelessness Board, and Toledo Fair Housing Center. So, tonight we're going to talk about the 2025-2029 Five-Year Consolidated Plan and also our One-Year Action Plan that's tied to that. The City receives funding each year from the U. S. Department of Housing and Urban Development (HUD) through programs from Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG). HUD requires that we develop a Five-Year Consolidated Plan that guides how we are going to use these funds. The plan looks at our community needs including affordable housing, community development, and current housing market conditions. It also uses community input and data to help us understand our biggest challenges. It helps set our priorities and make informed decisions about how we're going to invest these funds. The 2025-2029 Five-Year Consolidated Plan priorities identified were affordable housing development, homeownership opportunities, housing improvements, slum and blight clearance, fair housing planning and services, public services, infrastructure and public facility improvements, and economic development.

Our One-Year Action Plan, which covers program year 2026-2027, tells HUD what we plan to complete in that year. The plan will identify strategic projects and performance measures that will be carried out using our annual HUD funding allocation. It will also include our prior-year carryover funds. Projects included in the Action Plan are designed to address the needs, priorities, and goals established in the Consolidated Plan. If, for some reason, we have to make any type of additions, add new projects, or change the use of our funding, then the City would be required to submit what's called a Substantial Amendment to these plans. For this program year application process and timeline, we held an application mandatory meeting on Friday, January 9th. We held it in the morning for our Non-Homeless Service Providers, and then we also held a meeting in the afternoon for the Homeless Service Providers. We opened the office for open office hours for general CDBG questions on January 21st. On January 22nd, we hosted an application question session in the morning for the Non-Homeless Services Providers and did it again in the afternoon for the Homeless Service Providers. The application for the funding was due on Friday, February 6th, at 4:45 p.m. We're also holding two public hearings – we did the first one last Thursday, March 26th, and then we're doing the second one today. Hopefully, legislation will be submitted shortly to the Mayor's office. We can't submit our legislation to the Mayor's office or to City Council for approval until we actually receive our award notification from HUD. The last word we received was that it was possible to receive it by April 3rd, but we're anticipating that probably in the next week or so we may know what our allocations will be for the new program year.

The City has to participate in what's called a Citizen Participation Plan, and that outlines a comprehensive strategy for engaging our residents and stakeholders in the planning and implementation of our housing and community development activities. We do a 30-day comment period on the Draft Action Plan, which started Wednesday, March 25th, and will run through Friday, April 24th. Again, we do hold two public hearings as we're required to by our Citizen Participation Plan. The first one was last Thursday, March 26th, and then the second one is today, April 22nd. The public hearings and comment period are promoted through an outreach campaign that includes public notices; a press release; website postings; social media updates, including Facebook; and also email notifications to our community partner organizations. We also hold all public hearings in an accessible facility to accommodate any individual with disabilities, and there is a virtual option if necessary. Whenever we do our application process, we use what's called a Citizen Review Committee (CRC), and this committee helps to determine who will be funded. Each year, nonprofit agencies serving low- to

moderate-income individuals or families are eligible to apply for our funding. The application process is competitive and is done through an online system, but the key component of that is our CRC. They serve as an advisory board to our department, the Mayor's office, and also to City Council. They're comprised of volunteers and community leaders who live, work, own businesses, or otherwise represent the interests of our Toledo low- to moderate-income residents. The CRC plays an essential role in our funding review process. In coordination with our Internal Review Committee (IRC), the CRC evaluates the applications, participates in agency interviews, and also provides funding recommendations for our CDBG and ESG programs. We had two CRCs – one was for our Non-Homeless Services Providers and the other one was for the Homeless Service Providers. The Non-Homeless Service Provider CRC was comprised of representatives from ProMedica Ebeid Center, John Henry Eldred, Jr. Foundation, Lucas County Department of Job and Family Services, Toledo Lucas County Public Library, Toledo Public Schools, TARTA, and a private consultant. For the Homeless Services Provider CRC, representatives included agencies from the Continuum of Care, Anne Grady, NAMI Greater Toledo, Team Recovery, Criminal Justice Coordinating Council, Toledo/Lucas County CareNet, Toledo Lead Resource Center, YWCA of Greater Toledo, Mental Health and Recovery Board of Lucas County, and Lucas Metropolitan Housing.

For our application process and timeline, we started out with an initial application and orientation, so that included our mandatory orientation meeting. Any applicant seeking CDBG or ESG funding was required to attend the application session. The session provided a general overview of eligible activities, HUD national objectives, and also application procedures, which included submission requirements. The applications had to be submitted by the established deadline, and if there were any late or incomplete applications, they were not accepted or considered for funding. The applications undergo an initial review by the IRC to ensure completeness and eligibility followed by the CRC doing a final evaluation. As a part of that process, applicants are required to participate in interviews with the CRC to support the overall funding assessment. Next, we do a CRC review and recommendation. So, following the applicant interviews, the CRC convenes to deliberate and develop their funding recommendations. These recommendations are submitted to the Director of the Department of Housing and Community Development for final administrative review and approval. Upon that completion, the final funding recommendations are forwarded to the Mayor for consideration and approval and then prepared and submitted to City Council for the formal authorization of our funding awards.

The minimum application requirements for our Homeless and Non-Homeless Service Providers – you had to be a non-profit 501(c)3 in operation for at least two years. It could be government agencies, and that's government entities or quasi-government agencies; other nonprofits, as long as they were in operation for, again, at least two years; certified Community Based Development Organizations (CBDOs); homeless service providers; and then any other nonprofit that could demonstrate capacity to implement the proposed activity or project. The evaluation criteria that we looked at included the agency's financial stability, board of directors' composition, project budget and any leverage funds for their one-to-one match, the activity impact for the community, and then the overall organizational capacity and past performance.

For the 2026-2027 application, we received a total of 34 applications for CDBG and the request total was \$4.5M. For the HOME program, we received one application for homebuyer development that totaled \$400,000.00. For ESG, we received nine applications from our Homeless Service Providers for a total of \$1.3M.

For the 2026-2027 Action Plan resources - right now, we're basing everything on what we received from our 2025-2026 program year, so we're anticipating level funding – this is what we have been told by HUD that we should be receiving, so we're basing everything off of \$7M. We do have about \$1.8M in carryover, so the total resources that we're looking at for the 2026-2027 program year is about \$8.9M in CDBG. For HOME, the allocation for 2026 if we receive level funding, would be \$1.9M. We do have some carryover of about \$5M, so we're looking at total resources for HOME of \$6.9M. For ESG, the allocation would be \$627,043.00, and that's our total resources. We don't have carryover money for ESG. So, those are the dollars that we're looking at possibly receiving. It could change depending on the actual allocations from HUD, but that's what we're thinking we're going to receive if they are going with the same level of funding as we received for 2025-2026.

In the breakdown of our resources for CDBG, we're going to allocate about \$1.4M for Planning and Administration. For Housing Program Delivery, which is our Housing Division staff, we are allocating about \$900,000.00. For Public Service activities, we're limited to a 15% CAP, so we can only allocate \$1,057,000.00 to public service activities, so that's the amount we're going with. For Affordable Housing, we're going to allocate

\$1.8M. For Neighborhood Parks and Community Centers - \$1M. For Economic Development - \$747,000.00. For the Toledo Neighborhood Capacity Building Institute - \$150,000.00. We are going to allocate \$220,000.00 towards our NRSA Public Services. For our NRSA Housing activities - \$825,000.00. We will also be implementing two new strategies that will be allocated funding, including NRSA Code Compliance Demolition at \$250,000.00 and NRSA Strategic Economic Development at \$500,000.00. So, that accounts for the \$8.9M for the 2026-2027 program year under CDBG Resources.

For our HOME resources, we're capped at 10% for HOME administration, so we are going to allocate \$196,572.00. For CHDO Set-Aside, there's a 15% minimum that we have to do, so with our carryover, we are going to allocate \$844,859.00. For Homeowner Rehabilitation, we're not using any of our allocation, but will be using \$2.4M in carryover dollars. For Rental Housing Development, a total of \$1.4M will be allocated. For the Home-At-Last Down Payment Assistance Program, we're not using any of our current allocation, but will fund this activity using \$1M in carryover dollars. For Homebuyer Development, we will be using \$1M in carryover money. So that totals the \$6.9M we will be using in HOME dollars.

Under ESG resources, for Essential Services, which includes our emergency shelters, we're allocating \$376,225.00. For Stabilization Services - \$48,539.00, for Administrative Operations - \$47,028.00, and then for the Homeless Management Information System (HMIS), a total of \$155,251.00 will be allocated. So, that accounts for the \$627,043.00 for the 2026-2027 program year.

I want to talk a little bit about our NRSAs. We do have what's called a NRSA, which is a Neighborhood Revitalization Strategy Area, and this is a tool that HUD allows us to use where we can target investments in our distressed neighborhoods. It allows us to provide greater flexibility in the use of our CDBG funding, and we can do this over a five-year period. We just recertified our three NRSAs, and I'll talk about that later in the presentation about which ones those are, but we just recertified them for another five years with our new 2025-2029 Five-Year Consolidated Plan. So, some of the key benefits of a NRSA designation is that it allows you to leverage private and public funding, so you don't have to use any new CDBG funds – you can reallocate existing resources. It also allows you to expand your household assistance to 120% Area Median Income (AMI). It supports job creation and retention and then, depending on the activity that the agency is doing, allows you to exceed your public services CAP by allowing a greater investment in services like workforce development, financial literacy, and healthcare. So, there's an exemption on the public services CAP for certain agencies in the NRSA neighborhoods. The key advantages of NRSAs are, again, strategic investment and resource leveraging in our targeted communities. Again, you can exceed your public services CAP, allowing for more funding for critical programs. You also have more flexibility in your reporting; it streamlines your compliance and also expands the income eligibility up to 120% AMI.

The first NRSA is the Old South End NRSA, which is bounded by the Anthony Wayne Trail – it goes around that whole area. The next NRSA is the Englewood area. The Englewood NRSA boundary area includes Albion, Smead, and comes around I-475. The third NRSA is in the Junction area, which overlaps the Englewood area a little bit – Dorr Street to I-75, and then it comes around to Brown. We are looking at the Vistula neighborhood as possibly – if we receive the Choice Planning Grant – a fourth NRSA. We are waiting to see if there's going to be a planning grant coming out to apply. If it does and we are able, we can designate the Vistula neighborhood as a NRSA.

So, if you have any public comments that you want to submit on the Action Plan, you can submit them in writing – you have until Thursday, April 24th. You should send them to the City of Toledo, Department of Housing and Community Development, 2026-2027 One-Year Action Plan, One Government Center, Suite 1800, Toledo, Ohio 43604. The Action Plan Draft is available on the City's website for you to view. You can also pick up a hard copy from the library. It's also available on the websites of Lucas Metropolitan Housing, Toledo Fair Housing Center, and Toledo Lucas County Homelessness Board, as well as the Lucas County Board of Developmental Disabilities. You can always download it to review and then send any comments that you have.

That's all I have at this time. I will turn it over to the Toledo Lucas County Homelessness Board to do their presentation on homelessness followed by The Fair Housing Center. We'll then round it off with Lucas Metropolitan Housing to end it all for the night. We will hold all questions to the end. Make sure that you have signed in at the sign-in desk, and then we'll have questions at the end of the presentations.

Lisa Pengov: Good evening, everyone. Thank you for the opportunity to be here today. My name is Lisa Pengov, and I am here representing the Toledo Lucas County Homelessness Board and our Home For Everyone Continuum of Care. Tonight, I want to share with you our one-year action plan and what we're doing to better help people in our community who are experiencing homelessness. First, let's talk about the problem. In the past, our system had a lot of barriers. People had to tell their story over and over again to different agencies. Programs didn't always share information, and sometimes people didn't get the help they needed fast enough. That made it harder for people to move out of homelessness and into stable housing. Now, we're making important changes – we're moving to an open HMIS system. This means that, with permission, service providers can share information and see a person's history.

Instead of starting over each time, we can understand someone's needs faster, avoid repeating the same questions, reduce stress and trauma, and get people connected to housing more quickly. We are also introducing a new assessment process. This will help us to better understand who needs help the most, what kind of help they need, and how we can match them to the right services. In simple terms, we will finally be able to see the full picture and respond in a smarter way. This year, we are focusing on three main priorities - Coordinated Entry, Key Performance Indicators, and Data Quality.

First, we'll talk about Enhancing Coordinated Entry. Coordinated Entry is the front door to our system. It's when people call 2-1-1. That's how that happens and it's the first step in our coordinated entry system. We're improving how people enter and move through the services so it's easier, fairer, and more coordinated across all partners. Like I said, we're working closely with United Way 2-1-1 and some outreach teams and looking to build some outreach teams to make sure no one falls through the cracks. Next, we'll talk about the Key Performance Indicators. Key Performance Indicators are what we use to measure what works. We track things like how quickly people are housed, how long they stay housed, and how well programs are performing. This helps us make better decisions and use funding wisely. Finally, Data Quality. When we have better data, that means we can have better results. With improved data, we can identify real needs in our community, see trends in homelessness, and plan smarter solutions. We're also expanding some important programs. Right now, we're working on expanding the HIVE program. HIVE stands for Housing, Integration, Visibility, and Engagement. It's a connection platform to streamline housing options for the unhoused community. Case managers can match their clients' needs with landlords that are willing to rent to our population. There are currently 113 properties with 987 units listed across the properties. We know that right now there are 148 units available for people to rent. We also want to expand youth programs in our system. We want to make sure that young people who are experiencing homelessness get the support they need early. We want to make sure that when they're aging out of foster care or just coming into adulthood, they have the resources that they need. We have a growing youth advisory board who participates in system planning at both the local and the state level. We're very proud of that.

This year, we're going to begin fundraising efforts to support our critical community work including projects, such as the point-in-time counts, which help us understand how many people are experiencing homelessness. This is one night a year when groups of individuals go into the community in the middle of the night and count how many people are living on the streets or in abandoned buildings. We also want to fundraise for Code Blue events. These are warming stations or cooling stations that provide safety during extreme cold or hot weather. And then finally, we want to have some targeted outreach events to reach people that are living outside, and by expanding our outreach programs, we'll be able to have tables at events and different things like that where we can help people by being visible to them. So, our goal is simple – we want to reduce barriers; use better data; and help people move into safe, stable housing faster. This plan allows us to better understand our homeless community, not just guesses, but real data, and create real results. Thank you for your time today and your continued support in making Toledo a place where everyone has a place to call home. Here's my contact information. If you have any questions, please email or call us. We'd be happy to answer those questions. Thank you.

Monica Brown: Thank you, Lisa. We now will have George Thomas come up and present about fair housing.

George Thomas: My name is George Thomas, I'm the CEO and General Counsel for The Fair Housing Center, and we'll talk about fair housing issues in the City of Toledo. Just really quick to explain who we are – we're a nonprofit, we're not part of the City of Toledo, but we're a separate 501(c)3 nonprofit, civil rights agency that promotes housing choice, the creation of inclusive communities of opportunity, and the protection and

expansion of fair housing rights to support strong communities free from housing discrimination. So, that was our mission statement – kind of a mouthful, but what that really means is... your home, where you live, powerfully affects every aspect of your life, your job opportunities, education, transportation, health, and safety. Fair housing ensures that every person can find a home regardless of their protected class. What I mean by that is it stops discrimination based on one of those classes including race, color, national origin, sex, religion, familial status, disability, etc. Just for everyone's information, The Fair Housing Center provides free services for victims of housing discrimination; anyone seeking information about fair housing laws, such as housing professionals; and tenants in Lucas County experiencing housing conditions issues. On the screen is our website, address, and contact information in case anyone needs to reach us.

The primary reason I'm here to speak today is about a report that we do for the City of Toledo. It's one of our many functions in the community. We complete what's called the Analysis of Impediments to Fair Housing Choice, or AI for short. That's kind of a big – using some big words there, but really what that means is we study housing issues in the Toledo community and we identify barriers to fair housing choice that might be prevalent in our community and prevent people from getting access to the housing that they need. That process of identifying those barriers begins with community outreach, including a survey and focus groups. We review the local history and demographics, draw on census data and other studies, and then, once we identify those barriers, we also create an action plan to help eliminate those barriers in our community.

A few examples of some of the barriers that we identified that we want to try to remove in our community include access to homeownership, which is a critical need in our area. Not everyone can get equitable access to homeownership that we really want to see in our community. In fact, Toledo is slowly becoming, potentially, a majority tenant community, which for some people may be great – maybe that's what they prefer is to be a tenant, but for many people, access to homeownership means access to the American dream and the ability to pass on generational wealth to their children. So, there's many things we can do to address that barrier. One simple thing is just education and outreach about homeownership as a potential for people. So, the City is actually planning a Homeownership Fair coming up relatively soon – I think it's in June. The City and other community partners, including The Fair Housing Center, could approach banks and encourage them to not only have better products that make homeownership better available for them, but also to market those products and make sure the community is aware of those kinds of things. There's some other suggestions that we have in the plan, but to save time, I won't go through all of those.

Another barrier identified was discrimination based on source of income. So, what I mean by that is federal law may protect against discrimination based on race and disability, but currently, fair housing laws don't prevent discrimination based on your source of income. So, let's say, you pay rent with a housing choice voucher, or perhaps military benefits, and that should be able to carry you wherever you'd like to go or wherever that voucher could afford or your military benefits can afford, but what if a landlord or other housing provider says, well, I won't accept your housing choice voucher – I just don't like that source of income. What that means then is that folks with that source of income are then concentrated only in certain neighborhood areas where people may be willing to accept that type of payment, and we have indeed seen that as prevalent in this area, and so we've made some suggestions to the City to help eliminate source of income discrimination. We actually have passed a local law, so the next step now is to work with the City to make sure that local law is actually being enforced, and there has been some progress in that regard more recently with training some of the staff internally at the City about enforcement.

The really important issue is land use and zoning, so that's where housing really starts is making sure that zoning can be approved and land use plans can be approved to allow for the construction of buildings or allow for the use of housing in a particular area. Just as one example here – this is a dense issue, but one example is we do need to make it easier for housing for people with disabilities to be allowed to exist in Toledo. One example is group homes for folks with disabilities. There are some things we can do in our local zoning code to improve access to them.

It's really important to note substandard housing conditions as a barrier to fair housing choice in our area. Toledo has an aging housing stock in many neighborhood areas, especially historically redlined or disinvested neighborhoods. The housing stock is particularly subject to decline because of a lack of investment over the decades. So, it's one thing to be able to access a home, but what if that home makes you sick, or has deteriorating conditions? There's certainly a number of things that the City and partners can do to improve on

that. The Fair Housing Center, for example, has a program that helps tenants experiencing substandard housing conditions.

One of the last barriers is just making people aware of their rights – people being aware of who to call, or how to recognize housing discrimination when they see those kinds of issues. The City should continue to support efforts that we conduct, for example, education outreach efforts, but part of the reason why we're here today, too, is to make sure the public is educated on access to fair housing. That's part of the reason why I gave our contact information, hours of operation, and website earlier. We definitely want people to contact us if they're experiencing housing discrimination. So that's actually it for me, and I know that we'll take questions at the end. I covered a lot of different topics and policy initiatives that the City can and should undertake, and we're happy to partner with the City. So happy to receive questions at the end of the presentation, too.

Monica Brown: Thank you, George. Next, we'll have Senghor Manns from Lucas Metropolitan Housing.

Senghor Manns: Good evening. My name is Senghor Manns; I'm the Chief Executive Officer and President for Lucas Metropolitan Housing. It's a pleasure to be here this evening. I will be brief. So, this is going to primarily focus on public housing as a part of the City's Action Plan. The primary focus is on public housing, so there might be a little bit of public housing-adjacent comments, but for the most part, focusing on public housing. So, a little bit about the Housing Authority – what's our purpose? Our vision is to be the lead partner in creating communities of choice where everyone has a place to call home. Our mission, which was established in 2024, is to be leading in the development and sustainability of housing accessible to all and providing pathways to an enhanced quality of life to empower vibrant communities. For our public housing program in particular, at least for 2025, the total number of units that we have under management is roughly 2,400, and the total number of families on our waitlist is approximately 4,000. We opened our waitlist for a three-day, well, a little under a week late last year, and we had roughly 3,500 applications in that period of time, so then we subsequently closed that application. We averaged last year about 300 families leaving our apartments, so as you can tell with the waitlist of 4,000 and turnover of only 300, there's a greatly disproportionate number of people leaving our housing versus the demand that we have, and so, clearly, there's a great need for additional supply in this region, or in this city. So, as I said, in 2024, we developed a new mission and vision, and our strategic plan was a part of the creation of that mission statement that you saw. So, I've provided here what the primary goals are that were set out as a part of the five-year strategic plan that was developed.

The goals are to invest in our employees' growth and enhance workplace satisfaction. It's important to us that we start to not only be able to effectively recruit our staff – quality staff, but also to retain our staff, so pouring into our workforce is certainly a priority of ours now. We want to increase our revenue and pursue diverse income streams. I don't have to tell anybody, at least in this room, that to primarily depend on HUD resources is to live very precariously on the edge of, potentially, funding cuts and other funding challenges that HUD brings with their programs, and so we're trying to diversify our income streams by not being so wholly dependent on HUD resources. We want to lead in the effort to create accessible housing opportunities in Toledo and the region. We want to streamline our processes and elevate our user experience and satisfaction. We've been updating a lot of our IT programs – we want to launch an inclusive communication strategy to educate stakeholders and foster community awareness and building pathways to family income, wealth building, and economic advancement. We want to increase revenue in pursuit of diverse income streams and lead in the effort to create accessible housing opportunities in Toledo and the region. Our approach to housing in the region primarily hits on those two points, and so what we intend to do over the next year and a half, over 2026 and 2027, is to continue to pursue our opportunities to improve and reposition our portfolio to create improved living conditions – our quality of housing opportunities, and I'll go over a little bit of that later here. We want to improve neighborhood conditions to create mixed-income communities of choice and transition to a more sustainable, diverse funding model to support ongoing capital and operational needs – going back to what I was talking about earlier.

So, some of the projects, and this is not an exhaustive list – there are other projects, and these are not all public housing, quite frankly, like I said, kind of public housing-adjacent. I won't read through all of them, but some of the projects that are noteworthy include McClinton Nun, which is a public housing community next to our Collingwood Green properties off Nebraska and Collingwood. McClinton Nunn will receive about a \$10M facelift. Not just a facelift, actually there is going to be a lot of internal work done to the furnaces and boiler

systems as well, so there'll be some HVAC and boiler system improvements, lighting, roofs, and facade improvements, but the point of it is, you know, for us to increase the quality of life – the standard of living over in that area, and so we're going to be pouring in significant resources into that community. Vistula Manor, which is a senior building, is going to have a facelift as well, along with some first-floor interior improvements that'll actually be a lot more comfortable lounging space for our residents, and so we're also going to be doing some exterior work, and you'll be seeing it over the next six months. There's going to be a lot of work that will be done on the back side of the building. We have plans to put down new sidewalks along with our partnership with the City, along with some fencing around the parking area, so there'll be a nice black wrought iron fence for security purposes, and then we're actually going to be doing new decking on the patio so that we actually have a nice seating area in the back for our residents. Port Lawrence will receive some lighting upgrades and some heater valve replacements. Weiler Homes and Spieker Terrace, one of our older communities that has been waiting, I think, for a very long time to be, if not demolished, renovated. Our goal is to look at both options this year and really start to come up with a full-scale master development plan through an agreement to develop that whole area on the east side. It will probably start with Spieker Terrace, then we'll end up moving folks to, hopefully, some newer units, which will allow us to free up space at Spieker Terrace, and then, ultimately, do the renovations and/or some demolition of Weiler Homes. So, that's soon to come – it's going to be a huge project for us.

Collingwood Green Living is a senior community. It's a 202 that should be opening, hopefully in the next two months. It's 75 affordable housing units that serve seniors, and then Ten Eyck, our goal is to make some HVAC improvements and do some exterior work for that tower. I have some others that are on the table here, but the point of it is that we're going to be doing a lot of work, not just trying to expand housing. We also have, and I think George pointed out, an aging infrastructure – an aging portfolio just around the city generally. Then we have to start – various institutions and partners have to start pouring money into resources in improving the quality of our current portfolio in the city, and so that's going to be one of the Housing Authority's main objectives. And then finally, I think there was some reference to homeownership. LMH has one of the only, if not the only, Financial Opportunity Center run by a housing authority in the State of Ohio. We have a Financial Opportunity Center and it's fair to say that for us, our goal, especially when you have a 4,000-person waiting list, is to not have folks need our services. Our goal really is to have families use our services for a period of time and get themselves in a condition or a position where they can actually become self-sufficient and independent. and then hopefully be able to attain that American Dream like George had alluded to earlier. So, our Financial Opportunity Center and our Family Self-Sufficiency Program actually help our residents and others – it doesn't just have to be a resident – work on plans and work on a process to actually make themselves self-sufficient, and so we're actually going to be expanding that center over the next couple of years through certain funding sources that we'll be dedicating to that effort. So happy to take any questions afterwards. Thank you.

Monica Brown: Thank you. At this time, we will open it up for any questions that we may have from the audience. Any questions? Okay, if there are no questions, I'll just remind you that the public comment period runs through Thursday, April 24th. Any comments can be submitted in writing to the City of Toledo, Department of Housing and Community Development, 2026-2027 One-Year Action Plan, One Government Center, Suite 1800, Toledo, Ohio 43604. That concludes our second public hearing.



City of Toledo's Post



City of Toledo

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Each year, the City of Toledo's Department of Housing and Community Development prepares an Annual Action Plan that guides how federal funding is used to support programs that improve housing conditions, invest in economic development, and provide important services for residents.

In the past, these funds have supported home repair and rehabilitation programs and improvements to parks and community facilities across our city. Right now, we're gathering community feedback in two ways:

Public Hearings

Thursday, March 26 and Thursday, April 24

5:30 PM.

City Council Chambers, 1st Floor

Online Commenting Period: March 25 – April 24

The Draft One-Year Action Plan will be available for review beginning Wednesday, March 25 on our website.



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All comments



Stephen Leggett

I have a comment for Wade how about we reestablish our unlimited bulk pick up so that we don't have so much ridiculous illegal dumping and by the way, you've been excluding key numbers from the engage Toledo reports about garbage being left at curbs. Can we get some accurate numbers from Engage Toledo or the number of calls and reports via see click fix about garbage pile at the curb or is that is inconvenient for the administration?

4w Like Reply Hide Edited

3



NJ Jaxon

Stephen Leggett Absolutely agree!

4w Like Reply Hide

1



Comment as City of Toledo





City of Toledo's Post



City of Toledo

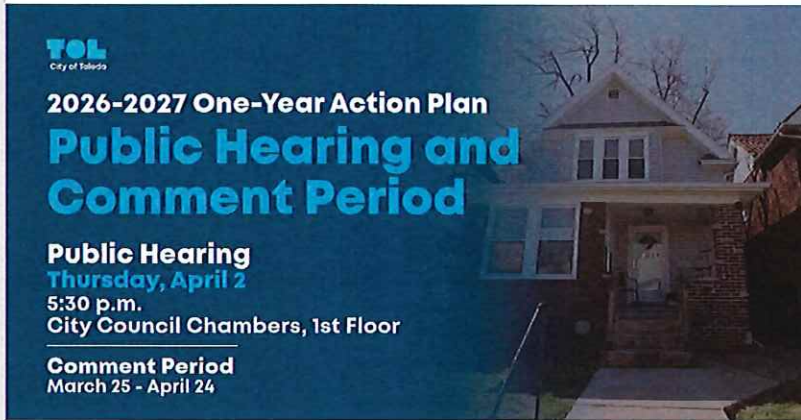
Published by Social News Desk · April 1 at 2:30 PM ·

The second public hearing for the **2026-2027 One-Year Action Plan Public Hearings and Comment Period** is tomorrow. !

This plan helps guide how we support housing, community programs, and economic development each year, and we want your input.

Review the plan using the link in the comments and share your feedback in one of three ways:

- ✉ Mail: One Government Center, Suite 1800
- 💬 Comment below (your comment counts as public input)
- 🗳️ Attend the public hearing on April 2 at 5:30 PM in Toledo City Council Chambers



See insights and ads

Boost post

11 3 13

All comments ▾



Author

City of Toledo

Read the 2026-2027 Draft One year Action Plan here:

<https://cdn.toledo.oh.gov/.../2026-2027-draft-Action-Plan...>

2w Like Reply



Radi Chealb

We need to build houses 🏠 and it can be done by relaxing the PLA bargaining

2w Like Reply Hide



Nico Robin-Nami Jackson

Radi Chealb It's not like we support unions anyway. They only want union labor dollars. Not union labor. So yeah relax away

2w Like Reply Hide Edited



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City of Toledo's Post



City of Toledo

Published by Social News Desk · April 10 at 12:30 PM · 🌐



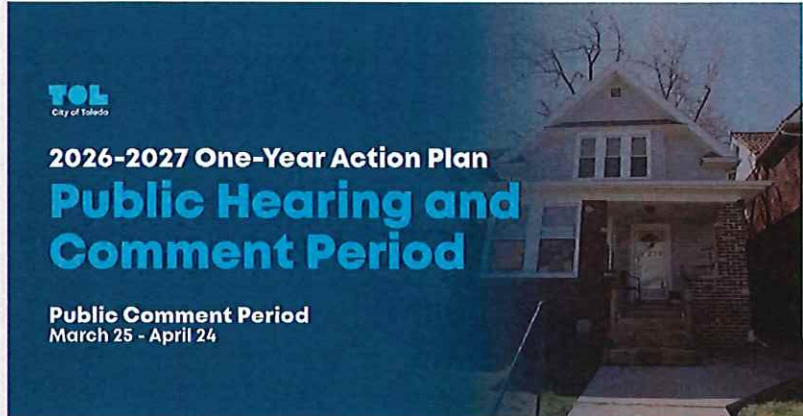
As we wrap up #CDWeek2026, we want to remind you that your voice matters in how we use the Community Development Block Grant (CDBG) in Toledo.

The Department of Housing and Community Development is currently collecting public feedback on the 2026-2027 One year Draft Action Plan. This Annual Action Plan outlines how we will allocate CDBG and HOME funding to support the projects and services that matter most to residents.

Here's how to give feedback:

👁️ Review the draft action plan (link in the comments).

💬 Comment your thoughts on the plan below this post, your comment will be collected as public feedback.



[See insights and ads](#)

[Boost post](#)

7 29 11



All comments ▾



Author

City of Toledo

Read the Draft Action Plan: <https://cdn.toledo.oh.gov/.../2026-2027-draft-Action-Plan...>

1w Like Reply



Nico Robin-Nami Jackson

City of Toledo You think everyday citizens are going to read 70 plus pages of a report, presented like this and them comment? Either you're that out of touch or you really DONT want input. You know people in this city look at letters and think theyre bills? This is actually pathetic. Typical and not surprising, yet pathetic 😞

1w Like Reply Hide



Reply to City of Toledo



Author

City of Toledo

Drop your feedback in the below. 📄

1w Like Reply



Erin Traynum

City of Toledo where do we put feedback....the link is just to the document.

6d Like Reply [Send message](#) Hide



Reply to City of Toledo



Erin Traynum

Would suggest you all do a summary of the plan because as noted - many people do not read. I uploaded it into GPT (I know everybody don't like it but eh...I got to use it for my job so I use it). It gave a good summary of the document and I asked it to review for gaps and specific neighborhoods and other queries. Will copy/paste what it said.



Comment as City of Toledo





City of Toledo's Post



Shirley Weber
https://youtu.be/-DpYQVvCY_M?si=_dv9yBy1fVn0U-zb
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Nico Robin-Nami Jackson
People do not read.
1w Like Reply Hide 2 🗨️ 😬



Erin Traynum
Nico Robin-Nami Jackson they really don't lol
6d Like Reply [Send message](#) Hide 1 🗨️



Reply to Nico Robin-Nami Jackson



Erin Traynum
2. Neighborhoods Targeted & Citywide Initiatives
A. Targeted Neighborhoods:
1. Old South End NRSA
2. Englewood NRSA
3. Junction Choice Neighborhood NRSA
4. Vistula Neighborhood (in process for NRSA designation)
5. East Toledo Target Areas: Specifically neighborhoods of Garfield, Raymer, Starr.
Past and current investments included:
• Home repairs, lead paint abatement, demolitions, community gardens, food security, youth/senior programs, and specific economic development initiatives[Source: 2026-2027-draft-Action-Plan.pdf].
B. Other Neighborhoods:
• The "Vistula Neighborhood" is being developed as an additional NRSA, focused on afterschool programs and slated for \$200,000 in planning and improvement funds (including as a Choice Neighborhood Planning Grant match).
C. Citywide Initiatives:
• Several programs (affordable housing rehabilitation, home repairs, down payment assistance, rental housing support, and lead abatement) are available citywide for eligible low- and moderate-income individuals/families.
• Public services (food, legal assistance, nonprofit capacity building, crime prevention, youth and senior support) extend beyond the targeted neighborhoods, aiming at all residents meeting eligibility criteria

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Erin Traynum
more mention of Vistula in this portion as well. As a north ender am concerned about what sort of mediation programs will be put in place for all this planned gentrification to protect current residents.

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Reply to Erin Traynum



Erin Traynum
Note I asked the query to provide gaps in this plan versus similar plans from other metro areas, this is findings - will be sure to include my opinion
Gaps Identified:
• No detailed breakdown of park improvements for neighborhoods outside the main NRSA/East Toledo/Vistula.
• No zip code-specific demolition/blight removal detail; prioritization is at the census tract/NRSA level.
• No CHDO organization names listed, nor project-level detail for their proposed efforts.
• LMI definition is used but deeper specificity on income tier breakdowns (i.e., 30%, 50%, 80% AMI) for each program could be clearer.
• Challenges in contractor supply for home repairs/rehabs and a continued need for enforcement on fair housing/source of income issues.
• No outcome tracking dashboard for projects and improvements by area.
Recommendations:
• Provide greater clarity and outreach on eligible neighborhoods and citywide program access, to ensure equitable distribution of services and visibility outside major NRSA.
• Publish zip code or census tract maps showing demolition—and blight-removal progress and upcoming targets.
• Publicize CHDO partnerships, success stories, and pipeline of specific projects.
• Expand and enforce source of income and fair housing laws with meaningful mechanisms.



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City of Toledo's Post



Erin Traynum

5. Identified Community Housing Development Organizations (CHDOs)

- CHDOs Funded: While the plan discusses annual recertification and that four CHDOs are certified as of July 1, 2025, no specific organization names are provided in the currently reviewed sections.
- CHDO Program Details: \$294,859 (plus \$550,000 in carryover HOME funds) is allocated for acquisition, gap financing, or new/rehabilitated housing development by CHDOs, who must meet HUD's nonprofit criteria[Source: 2026-2027-draft-Action-Plan.pdf].

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Erin Traynum

I asked the review to provide me names of the CHDOs - per this none of them are identified. Do we have any reputable CHDOs as the city does have a reputation of giving money to organizations who turn out to be kind of inept and don't provide a good benefit to the community.

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Reply to Erin Traynum



Erin Traynum

4. Affordable Housing and Down Payment Assistance—Income Requirements

- Affordable Housing: Targeted to low- and moderate-income (LMI) households. Income limits are typically set at or below 80% Area Median Income (AMI). Some programs also serve very low- and extremely low-income groups (30% and 50% AMI), prioritizing those populations in direct rental/housing assistance and lead hazard reduction efforts.
- Down Payment Assistance (HOME At Last):
 - o General eligibility: First-time homebuyers under 80% AMI.
 - o Assistance amount: Up to \$12,500 citywide; up to \$20,000 in NRSA neighborhoods for purchase and closing costs.
- Owner-Occupied Home Repair: LMI elderly/disabled/households are eligible for home repairs or accessibility modifications.

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Erin Traynum

Asked for income specifics for the affordable housing items. Many people are unaware of the requirements for this. Would wonder if "workforce housing" can be included due to it allowing a higher income to obtain funding. Though many may be upset about this - people who make more money are often better able to finance a home and take advantage of these programs due to them having a better financial history. I personally feel that Toledo focuses too much on very low income households and overlooks those in the middle for this type of assistance, which "workforce housing" would include more of that population.

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Reply to Erin Traynum



Erin Traynum

3. Demolition and Blight Removal Initiatives

- Demolition & Blight: In 2024–2025, 171 demolitions were completed across Englewood, Junction, Old South End, Raymer, and Starr, along with extensive tree plantings (Englewood: 156; Junction, Old South End, and East Toledo: additional plantings).
- Future Demolition: The city plans to demolish another 500 properties through 2026. Zip code-specific strategies are not detailed; instead, focus is given to CDBG-eligible census tracts and NRSA areas with the highest concentrations of vacant, blighted, or foreclosed properties.
- Lucas County Land Bank: Partners with the city to acquire, repurpose, and transfer vacant land for redevelopment, mainly in high-need areas[Source: 2026-2027-draft-Action-Plan.pdf].

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Erin Traynum

Per my instructions to provide zip code and/or neighborhood designations for future demolitions - there are no specifics given in the plan - would assume the neighborhoods mentioned throughout the plan would be the ones targeted. Curious about what will happen with demolished land/properties. We have a lot of overgrown lots in the city due to the demolition of various structures.

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City of Toledo's Post



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Erin Traynum

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Reply to Erin Traynum



Reply to Erin Traynum



Erin Traynum

1 - Planned Park Improvements:

Parks Not Yet Improved and Slated for Future Investment (2026–2027)

- Vistula Park: Scheduled new park and recreational developments.
- New Park in Englewood: Plan includes park development for the Englewood neighborhood.
- Sports Facility, Monroe Street (Citywide): Feasibility study for a new indoor sports facility at the former Jobs and Family Services Site.
- Note: Many parks in neighborhoods outside the NRSAs/Vistula or East Toledo are not specifically named for improvements in the current draft action plan. The plan focuses its funding on areas with the greatest low-moderate income needs and previous disinvestment.

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View 1 reply



Nico Robin-Nami Jackson

Wonder how many people have read this

1w Like Reply [Send message](#) Hide



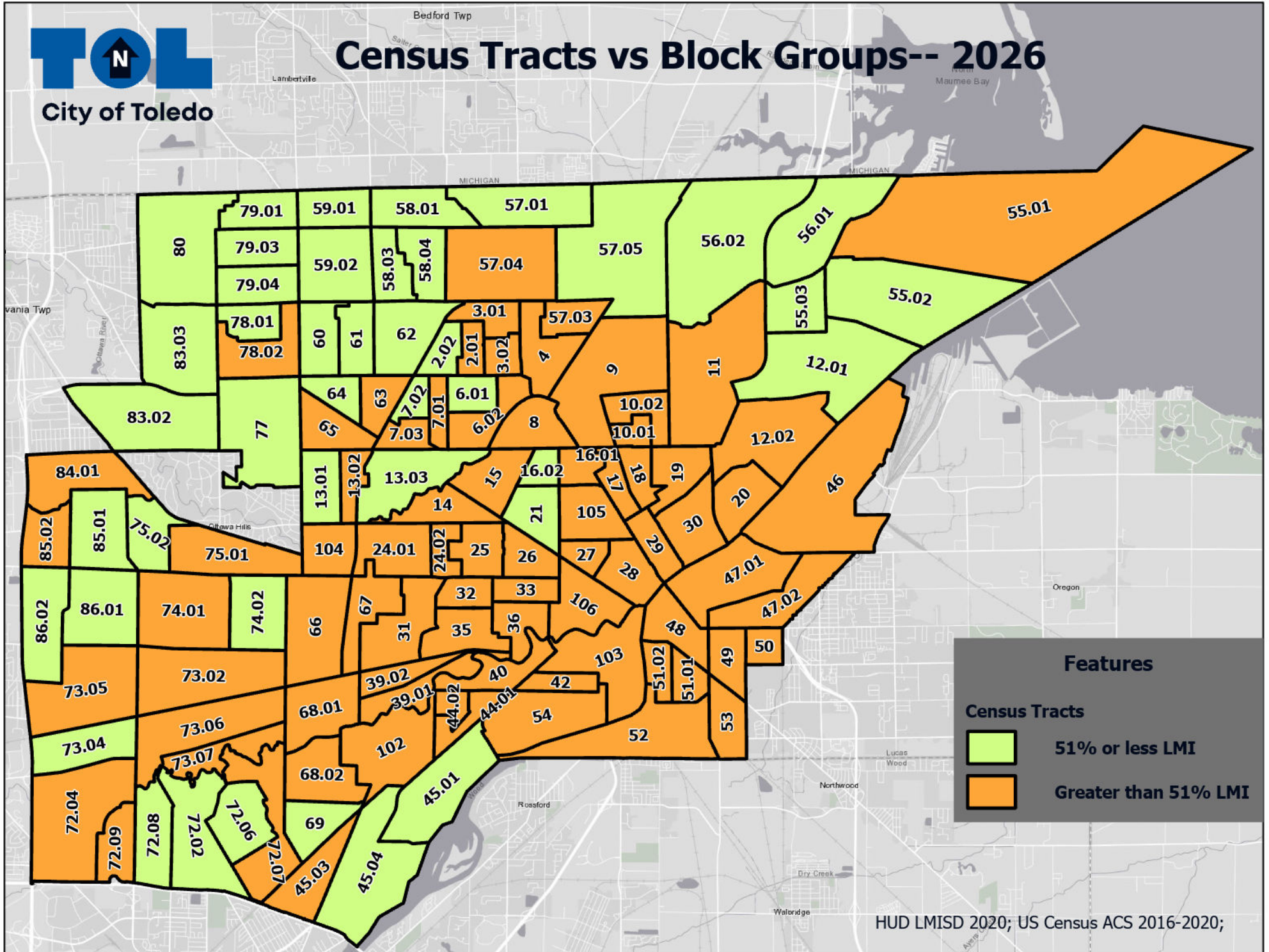
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MAP



Census Tracts vs Block Groups-- 2026



Features

-  Census Tracts 51% or less LMI
-  Greater than 51% LMI

HUD LMISD 2020; US Census ACS 2016-2020;

**EMERGENCY
SOLUTIONS
GRANTS AND
HOMELESSNESS**



OH-501 TOLEDO/LUCAS COUNTY CONTINUUM OF CARE WRITTEN STANDARDS

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INTRODUCTION

The OH-501 Toledo/Lucas County Continuum of Care (CoC) is responsible for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of the CoC, which covers all of Lucas County, Ohio. Both the Emergency Solutions Grant (ESG) Rule and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rule state that the CoC must establish and consistently follow written standards for providing Continuum of Care assistance.

They will be reviewed annually, and any substantial changes will be approved by the TLCHB Board of Directors.

The written standards have been established to ensure that persons experiencing homelessness who enter projects throughout the OH-501 Toledo/Lucas County CoC jurisdiction will be given similar information and support to access and maintain permanent housing. All projects that receive City of Toledo ESG and OH-501 Toledo/Lucas County CoC funding are required to abide by these written standards where applicable. The CoC strongly encourages projects that do not receive either of these sources of funds to accept and utilize these written standards.

It should be noted that the U.S. Department of Housing and Urban Development (HUD) regulations for each of the referenced programs shall always take precedence over any of the standards outlined in this document (<https://www.hudexchange.info>). The CoC Program Notice of Funding Opportunity (NOFO) may authorize additional eligibility requirements. Projects funded under the CoC program must follow both CoC Program NOFO and other HUD-issued guidance and requirements. In addition, local ESG Programs may impose additional requirements to their funding recipients that do not apply to other CoC recipients.

In the event of a declared state of emergency, natural disaster, public health crisis, or other extenuating circumstances, the OH-501 Toledo/Lucas County CoC may issue emergency protocols which would be in effect for the duration of and in response to those circumstances. Such guidance will be issued in a separate addendum to the Written Standards.

GENERAL STANDARDS

The following standards apply to all projects funded through the CoC or with City of Toledo ESG and CDBG funds.

HMIS Participation

All organizations receiving ESG, CDBG or CoC funds must participate fully in the CoC's Homeless Management Information System (HMIS) to enter data on persons served and assistance provided. Victim service providers receiving ESG or CoC funds are required by 24 CFR 576.400(f) and 580.32(d) to use a comparable database that meets all HUD standards for HMIS and provides for security, data quality, and privacy.

Coordinated Entry Process (a/k/a Coordinated Assessment System)

All projects located within the OH-501 Toledo/Lucas County CoC that receive CoC and Emergency Solutions Grants (ESG) funding are required to participate in the coordinated assessment system and are therefore subject to complying with the Coordinated Entry Written Standards, Policies and Procedures as outlined and developed by the OH-501 Toledo/Lucas County. This system will include all homeless subpopulations and involve the use of a standardized assessment tool designated by the Coordinated Entry Written Standards. This system will establish a uniform decision-making process to prioritize households seeking assistance and provide referrals to those households. The coordinated entry system (CES) will ensure that those with the greatest needs receive priority for housing and service provision and that no unnecessary barriers exist for individuals to receive assistance. The Coordinated Entry Written Standards, Policies, and Procedures can be found at [The Coordinated Entry Written Standards, Policies and Procedures can be found at: https://endinghomelessnessstoledo.org/coordinated-assessment](https://endinghomelessnessstoledo.org/coordinated-assessment).

The terms "Coordinated Entry Process" and "Centralized or Coordinated Assessment System" are used interchangeably throughout federal guidelines. The CoC Program interim rule at 24 CFR 578.3 defines centralized or coordinated assessment as the following:

"...a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool..."

For the purpose of this document, the term "Coordinated Entry" or "Coordinated Entry Process" are used to reference "Centralized or Coordinated Assessment System" and "Coordinated Entry Process."

Removal of Barriers

All projects that have committed to a Housing First approach must ensure that their projects do not screen any individuals or families out for assistance based upon perceived barriers to housing or services. All OH-501 Toledo/Lucas County providers are encouraged to review their policies and remove barriers wherever possible. Examples of this include, but are not limited to, the following:

- Having too little or no income

- Current or past substance abuse
- Having a criminal record (w/exception of state mandated restrictions)
- Having a history of domestic violence

In addition, assistance may not be terminated to any recipients based upon these barriers. Examples of this include:

- Failure to participate in supportive services and case management activities
- Failure to make progress on a services plan
- Loss of income or failure to improve income
- Being a victim of domestic violence

Termination of Assistance

ESG or CoC-funded homeless assistance providers may terminate assistance to a program participant who violates program requirements or conditions of occupancy. Termination under this section does not bar the provider from providing further assistance at a later date to the same individual or family.

In terminating assistance to a program participant, the provider must have in place a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance.
- Written notice to the program participant containing a clear statement of the reason(s) for termination.
- The option for a review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision.
- Prompt written notice of the final decision to the program participant.

Providers of permanent supportive housing for hard-to-house populations of homeless persons must exercise judgement and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that the participant's assistance is terminated only in the most severe cases. All CoC, ESG and CDBG must have a grievance policy.

Grievance Policy Process

The Toledo Lucas County Homelessness Board is committed to ensure that clients receiving services are aware of the rights afforded to them. TLCHB staff will prepare an annual summary of all grievances and resolutions and provide an annual report to the board of directors.

Procedure: Grievance Assignment

TLCHB's Executive Director will assign a team member from Toledo Lucas County Homelessness Board.

Once someone has been assigned, the agency will be contacted by notifying them via email as to who has been assigned to review the grievance.

Procedure: Client Grievances

1. The Toledo Lucas County Homelessness Board will accept and review all complaints/grievances.
2. TLCHB will notify the agency of the grievance and gain any additional details necessary to make a further determination.
3. TLCHB will then determine if further grievance follow-up will require an on-site visit with the agency and client.
4. Once a determination has been made the agency and client will be notified of the date and time that the visit will occur, and who is assigned to the grievance from TLCHB.
5. At the grievance meeting, both the client and the agency staff will have the opportunity to present all their concerns.
6. Once this meeting is concluded, within 7-10 business a report will be issued determining the outcome of the grievance.
7. The agency's Board President, Executive Director and client(s) will receive a copy of the final report

Procedure: Client Guidelines and Grievance Policy

1. TLCHB will annually review each agency's Client Guidelines and Grievance Policy.
2. TLCHB will provide an annual and semi-annual report of all grievances and outcomes to the Executive Director and Board President of each agency.
3. This information will also be made available for agency funders.

Faith-Based Activities

The minimum standards required for faith-based providers are as follows:

- Providers receiving funding through ESG, CDBG or CoC programs may not engage in inherently religious activities as part of those funded activities. Those religious activities must be offered separately from the ESG, CDBG or CoC-funded projects and all participation must be voluntary.
- All religious organizations receiving ESG, CDBG or CoC funding shall retain their

independence from government and may continue with their missions provided that ESG, CDBG or CoC funds are not used to support inherently religious activities. They shall also maintain authority over their internal governance.

- No organization receiving ESG, CDBG or CoC funds may discriminate against a participant based on religion or religious beliefs.
- ESG, CDBG and CoC funds may be used for the rehabilitation of structures that are used for eligible activities under the programs but may not be used to rehabilitate structures used specifically for religious activities.

Fair Housing and Equal Opportunity

It is the policy of the OH-501 Toledo/Lucas County CoC to comply fully with all federal, state, and local nondiscrimination laws and to operate in accordance with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. The OH-501 Toledo/Lucas County CoC, including its recipients and subrecipients, shall not on account of race, color, sex, religion, national origin, family status, disability or age deny any family or individual the opportunity to apply for or receive assistance under HUD's Programs. All recipients and sub-recipients of ESG, CDBG and CoC funding must comply with the requirements for equal opportunity, nondiscrimination, and affirmatively furthering fair housing as outlined in Section 578.93 of the Continuum of Care Program interim rule and any applicable ESG regulations.

All clients served by an agency that is receiving ESG, CDBG or CoC funding has the following rights:

1. The right to receive all eligible services.
2. The right to be treated with dignity and respect.
3. The right to receive quality services.

Language Access Plan

All recipients and sub-recipients of ESG, CDBG and CoC funding must provide Limited English Proficiency (LEP) persons with meaningful access to federally funded programs. HUD issued new guidance on Fair Housing Act Protections for Persons with Limited English Proficiency on September 15, 2016, and DCA issued its new Language Access Plan (LAP) effective 2016 to 2021 that details its plan to provide LEP persons with meaningful access to programs. DCA will provide guidance and training to State of City of Toledo ESG, CDBG sub-recipients and OH-501 Toledo/Lucas County CoC recipients on providing language access services, including the components of a meaningful LAP, options for translation and interpretation services, and assistance with identifying methods to ensure meaningful access to programs and activities. More information on DCA's Fair Housing Policy can be found at the [Fair Housing Statement](#) page.

Allowable Family Limitations and Prohibition against Involuntary Family Separation

The CoC Interim Rule 24 CFR 578.93 (e) and 24 CFR 576.102(b) explicitly prohibit any kind of involuntary family separation and the denial of admission to selected family members in all CoC Program- funded projects and ESG-funded emergency shelters. It is acceptable for programs to limit participation to only households with children. However, if a project accepts any households with children, they must accept all households with children. This means that any provider that has historically accepted only women with children may not limit their project to

that population. They must also accept couples with children or single men with children as well.

In addition, the age and/or gender of a child under age 18 must not be used as a basis for denying any family's admission to a project receiving ESG, CDBG or CoC funding.

Equal Access Requirements

HUD published a final rule on September 21, 2016 entitled Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs that became effective on

October 21, 2016. This rule includes the following central provisions:

- All HUD-assisted and HUD-insured housing must be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- Owners and administrators of HUD-assisted housing and HUD-insured housing are prohibited
- from inquiring into an applicant or occupant's sexual orientation and gender identity for the purpose of determining eligibility or otherwise making housing available.
- The definition of "family" is revised to include all families regardless of the actual or perceived sexual orientation, gender identity, or marital status of its members.

This rule shall apply to all ESG, CDBG or CoC-funded projects with two exceptions. This prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant's sex where the housing provided or to be provided to the individual is temporary, emergency shelter for adults only with a physical configuration such that privacy is a concern, specifically shared bathing areas or shared sleeping areas. A shared bathing area is one in which there are multiple toilet stalls or shower stalls or open showers. Nor does it apply to inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled. In addition, this provision does not prohibit voluntary self-identification of sexual orientation or gender identity by participants. The OH-501 Toledo/Lucas County, including recipients and subrecipients, will comply with the Equal Access Rule at 24 CFR 5.105 and 5.106.

Complete City of Toledo ESG program requirements for written standards, policies and procedures, including ones not addressed in this document, can be found in the City of Toledo's Department of Neighborhoods ESG /CDBG Third-Party Partners Manual.

Violence Against Women Act (VAWA) Requirements

Under the HUD Final Rule Implementing VAWA Reauthorization Act of 2013, the OH-501 Toledo/Lucas County CoC have adopted policies to include provisions for protection of victims of domestic violence, dating violence, sexual assault, sexual battery or stalking, regardless of sex, gender identity, gender expression or actual or perceived sexual orientation.

These policies and procedures apply to CoC-funded Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH) programs. ESG-funded programs are subject to VAWA policies issued by the administrator of ESG funds. As a part of these policies and procedures, the CoC has put in place a policy for emergency transfers. The full details of the policy can be found in the City of Toledo, Department of Neighborhoods Third-Party Manual ESG / CDBG Guidebook.

STREET OUTREACH PROJECTS

Definition

Street outreach projects are those activities that are undertaken to identify potential homeless project recipients for the purpose of providing them with immediate support and intervention activities.

Eligibility

HUD Requirements

Recipients of these services must meet the HUD definition of homelessness under Category 1.

These would be unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

CoC Recommendations

Agencies administering Street Outreach Projects must have policies on safety standards and procedures. Engagement should occur during times when there is a reasonable expectation to believe people have no housing options

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution – one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

2. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/ Prioritization

Individuals and families shall be assessed where they are and will be offered the following Street Outreach services, as needed and appropriate: engagement, case management, emergency health and mental health, and transportation services where they are otherwise not available in the mainstream. Based on the need of services

population, Street Outreach projects must assess, prioritize, and re-assess the need for essential services related to street outreach, and they should continuously engage unsheltered persons and persons experiencing chronic homelessness (and most at risk of becoming chronically homeless), even if they repeatedly decline housing and services. When appropriate based on the individual's needs and wishes, the referral to permanent supportive housing or rapid re- housing that can quickly assist the individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to an emergency shelter. Street Outreach Projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures, which will provide information on prioritization and reassessment for services.

EMERGENCY SHELTERS

Definition

Any facility or project (including hotel/motel voucher projects) where the primary purpose is to provide a temporary shelter for the homeless in general, or for specific populations of the homeless, which does not require occupants to sign leases or occupancy agreements.

Eligibility

HUD Eligibility

Individuals and families entering the shelter system must be homeless per the HUD Homeless Definition, Category 1, literally homeless, Category 2, imminent risk of homelessness, Category 3, homeless under other federal statutes, or Category 4, fleeing or attempting to flee domestic violence (with documentation as detailed elsewhere in this document). Shelter facilities may accept clients that are not HUD-defined homeless, but they must administratively separate those clients so that ESG funds are not used for non-HUD-defined homeless clients.

CoC Recommendations

Projects should have expedited admission processes, to the greatest extent possible, including providing assistance with obtaining necessary documentation. Further, shelters should not require, upon admission, that residents have IDs or be entered into HMIS. Projects should also not require any fees.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution – one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

2. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment /Prioritization

Emergency Shelter projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures. Domestic violence (DV) projects may utilize the coordinated entry system but are not required to participate due to issues of confidentiality. Homeless youth (12 – 18 yrs. of age) may still access shelter through an existing community program. Priority will be given to individuals and families with no income and to those who have extremely low income (30 percent of AMI) as dictated by Area Median Income.

TRANSITIONAL HOUSING PROJECTS (TH)

Definition

Transitional Housing Projects provide subsidized housing and supportive services, for a period not to exceed 24 months, to facilitate the movement of homeless individuals and families to permanent housing.

Eligibility

HUD Eligibility

Individuals and families must be homeless per the HUD Homeless Definition, Category 1, literally homeless or Category 4, fleeing or attempting to flee domestic violence as long as they meet category 1 requirements as well.

CoC Requirements

Priority should be given to individuals and families with no income and to those who have extremely low income (30 percent of AMI) as dictated by Area Median Income. Additional income limits may be set by additional funding sources of the transitional housing project.

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.

Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this. Entitlement jurisdictions within the CoC may further restrict funding of TH projects to require (and only fund) TH projects that serve high barrier households and/or special needs populations as they determine.

CoC Recommendations

While permanent housing is preferred, research shows that transitional housing may be an effective tool for addressing certain needs, such as housing for underage homeless youth experiencing homelessness, safety for persons fleeing domestic violence, and assisting with recovery from addiction.

Homeless individuals and families entering into TH are not expected to be able to qualify for permanent housing. Further, the enrollment of a chronically homeless client into a TH program causes that client to lose their chronically homeless determination making them ineligible for many programs. In cases where households become eligible for permanent housing, it is expected that TH providers will coordinate with organizations that administer these projects in their area. The provision of supportive services and case management are required to be available in transitional housing projects. Participants cannot be charged more than 30 percent of the total household income as rent.

In order to lower barriers to entry, reduce lengths of stay, and improve exits to permanent

housing, the CoC supports the utilization of transitional housing beds as bridge housing for people who are homeless, where shelter beds are not available and permanent housing has been identified. It should be established at entry that they are chronically homeless and waiting to move into PSH, and the client should not be enrolled into the transitional housing project or be expected to follow service plans associated with the transitional housing project. Please note that there should be a reasonable expectation that the household will move into permanent housing within 30 to 90 days.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

- 1) Literally Homeless (in order of preference)
 - a) Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b) Written observation by an outreach worker; or
 - c) Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d) For individuals exiting an institution – one of the forms of evidence above and;
 - i) Discharge paperwork or written/oral referral, or
 - ii) Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/ Prioritization

Transitional housing projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures. Participants may be referred from a broad range of social services including shelter and street outreach. Priority will be given to individuals and families with no income and to those who have extremely low income (30 percent of AMI) as dictated by current HUD limits. Additional income limits may be set by additional funding sources of the transitional housing project.

Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Transitional Housing. Such individual or family shall meet all eligibility criteria required by Federal law or regulation or HUD NOFO, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project. The individual or family shall retain their original homeless or chronically homeless status for the transfer.

RAPID RE-HOUSING PROJECTS (RRH)

Definition

Rapid Re-Housing Projects (RRH) provide housing relocation and stabilization services and time limited rental assistance (short- or medium-term rental assistance) and supportive services to help homeless individuals or families move as quickly as possible to permanent housing and achieve stability in that housing.

Eligibility

HUD Eligibility*

Individuals and families must meet the Category 1 definition of homelessness (Literally Homeless).

In addition, those who meet the Category 4 definition of homelessness (Fleeing/Attempting to Flee DV) may also qualify if the individual or family is literally homeless. *Please note that an additional eligibility requirement of ESG RRH is that individuals and families must have an annual income at or below 50% AMI.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.

Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

Given that projects should be prioritizing employment assistance and increasing benefits as part of the case management plan, projects should be open to accepting people without current income.

Agencies must offer case management and supportive services to all participants receiving rental assistance that are designed to lead them towards long-term stable housing. Case management and related services may be offered to clients not receiving rental assistance at the agency's discretion.

CoC Recommendations

- Agencies should have a goal of providing a 100% subsidy to participating households for no more than six months and to provide any amount of rental subsidy for no longer than twelve months total.
- Assistance for households with no income or special circumstances could be extended to 18 months. An explanation of these special circumstances along with an evaluation of household needs must be documented in the client file.

Rapid Re-Housing Client Contribution Policy

It is the policy of Rapid Re-Housing (RRH) Projects to provide a declining rental assistance

subsidy to households participating in the RRH Projects. For households with income, a percentage or amount of client contribution may be based on a reasonable percentage of either the household's income or the monthly rent calculated pursuant to 24 CFR 578.37(a)(1)(ii)(B).

Rent Determination Procedures

- Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their rent. Rental subsidy determinations will be evaluated no less than monthly in case management meetings. Case managers will review household budget and determine what, if any, amount of rent the household is responsible for contributing based upon the household's needs and circumstances. The case manager will document the outcome of the subsidy determination in the client file.
- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution – one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

In addition to the homeless verification required above, income eligibility determination documentation is also required for ESG RRH.

2. All additional required program must be in clients file with 30 days of intake.
3. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/ Prioritization

Individuals or families may be referred from a broad range of social services including shelter and street outreach but must follow the OH-501 Toledo/Lucas County CoC policy for the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures. Priority shall be given to extremely low-income individuals and families (at or below 30 percent AMI) and to individuals and families that have longer length of stay in shelters or on

the streets.

Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Rapid Re-Housing. Such individual or family shall meet all eligibility criteria required by Federal law or regulation or HUD NOFO, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project. The individual or family shall retain their original homeless or chronically homeless status for the transfer.

CoC Rapid Re-Housing Projects Only

Utility Allowances (CoC funded only)

The OH-501 Toledo/Lucas County CoC Written Standards give individual projects discretion over the amount of rental assistance that can be provided to households, provided that the project provides a declining rental subsidy as described herein. Under certain circumstances, based on how a household's rental contribution is calculated, a project may be required to reimburse households for utilities.

If a project uses rent as a factor in determining a household's contribution, and the household is responsible for making separate utility payments that are not included in the contract rent, then rent must be calculated by adding total monthly rent to the monthly allowance for utilities established by the area's Public Housing Authority (PHA), pursuant to 24 CFR 578.37(a)(1)(ii)(B). In this scenario, households must be reimbursed for any amount that the utility allowance exceeds the household's share of rent.

Further clarifying details may be found in Notice CPD-17-11, issued on October 23, 2017. If this notice is amended, superseded, or rescinded by HUD, the most recent guidance from HUD will apply.

ESG Rapid Re-Housing Projects Only

In addition to the standards above, ESG RRH projects will be subject to the following standards.

Utilities (ESG only)

Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their utilities. Please note that utility assistance is not eligible under CoC RRH projects.

- Utilities subsidy determinations will be evaluated no less than monthly in case management meetings. Case managers will review household budget and determine what, if any, amount of rent the household is responsible for contributing based upon the household's needs and circumstances. The case manager will document the outcome of the subsidy determination in the client file.
- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual

projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Housing Stabilization and/or Relocation Services (ESG only)

The type, amount, and duration of financial assistance for housing stabilization and/or relocation services will be determined based on the needs of the household. The need for this assistance will be evaluated and documented in the client file.

HOMELESS PREVENTION PROJECTS

Definition

Homeless Prevention Projects provide assistance to individuals or families who are at the greatest risk of losing housing due to a legal eviction action that requires the individual or family to leave their residence no later than 14 days following the date of their application for homeless assistance.

Eligibility

HUD Eligibility

Households receiving this funding must have an income level below 30% AMI and must demonstrate that they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or other place defined under Category 1 of the homeless definition. Recipients may be in categories 2-4 under the homeless definition or meet the “at risk” definition in order to qualify for this assistance.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.

Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

CoC Recommendations

Project participants receiving this assistance should receive a case management plan from the provider in order to ensure long term stability. Best practice agencies will be ones with the ability to negotiate with landlords as the first step in resolving eviction crises and that also demonstrate a plan to effectively increase household incomes for project participants. The length of stay should be based on the needs of individual households participating in the project.

- Agencies should have a goal of providing a 100% subsidy to participating households for no more than six months and to provide any amount of rental subsidy for no longer than twelve months total.
- Assistance for households with no income or special circumstances could be extended to 18 months. An explanation of these special circumstances along with an evaluation of household needs must be documented in the client file.

Prevention Client Contribution Policy

It is the policy of Prevention Projects to provide a declining rental assistance subsidy to households participating in the Prevention Projects. For households with income, a percentage or amount of client contribution can be based on a reasonable percentage of a household’s income.

Rent Determination Procedures

Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their rent.

- Rental subsidy determinations will be evaluated no less than monthly in case management meetings. Case managers will review household budget and determine what, if any, amount of rent the household is responsible for contributing based upon the household's needs and circumstances. The case manager will document the outcome of the subsidy determination in the client file.
- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Utilities (ESG/CDBG)

Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their utilities.

- Utilities subsidy determinations will be evaluated no less than monthly in case management meetings. Case managers will review household budget and determine what, if any, amount of rent the household is responsible for contributing based upon the household's needs and circumstances. The case manager will document the outcome of the subsidy determination in the client file.
- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Housing Stabilization and/or Relocation Services (ESG/CDBG)

The type, amount, and duration of financial assistance for housing stabilization and/or relocation services will be determined based on the needs of the household. The need for this assistance will be evaluated and documented in the client file.

For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Required Documentation

Households receiving Homeless Prevention assistance must have a lease in the participant's name.

Documentation of the pending loss of housing can include an eviction notice, the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law. A court order is preferred, however, ESG and CDBG Recipients may allow sub-recipients to accept other documentation as allowed by HUD.

Assessment/ Prioritization

All homeless prevention projects are required to utilize the Coordinated Entry Process as outlined

in the Coordinated Entry Written Standards Policies and Procedures.

HOUSING PROBLEM SOLVING

Definition

Housing Problem-Solving is an evidence-based approach that utilizes strengths-based conversations to explore options to assist individuals experiencing housing insecurity in avoiding homelessness or lengthy stays in shelters or on waitlists. HPS is not rooted in historically marginalizing practices and utilizes an equitable approach for all participants that is not contingent upon the same standardized assessment used for other housing resources, screening, eligibility, or prioritization and does not require significant financial resources. HPS techniques can be applied to any stage in the Coordinated Entry Process through open-ended, exploratory conversations designed to find solutions that are unique to the household's needs, resources, and housing stability goals.

Housing Problem-Solving techniques include:

- Exploring the unique strengths of each individual's household and support network.
- Identifying personal resources, mainstream supports and safe housing alternatives throughout Lucas County to divert individuals from experiencing homelessness.
- Connecting individuals to resources and services in the community.

Housing Problem Solving is intentionally built to be flexible and adaptable based on current funding sources. Please refer to the [Housing Problem Solving Policy Guide](#) for greater detail regarding usage and eligibility.

SUPPORTIVE SERVICES ONLY PROJECTS (SSO)

Definition

Supportive Services Only (SSO) projects provide services to sheltered and unsheltered homeless persons to whom the provider is not providing housing or housing assistance.

Eligibility

HUD Eligibility

Participants must meet the HUD definition of homelessness under Category 1 (Literally Homeless) or they may fall under Category 4 (Fleeing/Attempting to Flee DV) if they also meet the definition in Category 1.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families.

Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

CoC Recommendations

SSO projects are expected to work with participants in order to connect them to permanent housing.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution – one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

Assessment /Prioritization

Supportive Services Projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures.

PERMANENT SUPPORTIVE HOUSING PROJECTS (PSH)

Definition

Permanent Supportive Housing (PSH) projects provide community-based housing and supportive services, without a predetermined length of stay, to assist homeless persons with a disability to live independently. The project will provide safe, affordable housing that meets participants' needs in accordance with HUD guidelines for permanent supportive housing projects.

Eligibility

HUD Requirements

In order to be served in a CoC-funded PSH project (individuals or family households) participants must meet the following project eligibility requirements:

- Participants must meet the applicable HUD definition of homelessness (category 1 or category 4); and
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability.

ELIGIBILITY CRITERIA FOR DedicatedPLUS Projects (Section III.C.2.g of the FY 2022 CoC Program NOFO):

A DedicatedPLUS project is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals, households with children, and unaccompanied homeless youth that at intake meet one of the following categories:

- (1) experiencing chronic homelessness as defined in 24 CFR 578.3;
- (2) residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
- (3) residing in a place not meant for human habitation, emergency shelter, or safe haven and had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement and met the definition of chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
- (4) residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3;
- (5) residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions and the individual or head of household meets the definition of 'homeless individual with a disability'; or
- (6) receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove

barriers to accessing services and housing that are experienced by homeless individuals and families.

Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need

intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

CoC Recommendations

Service Provision Criteria:

1. In providing or arranging for housing, the project considers the needs of the individual or family experiencing homelessness.
2. The project provides assistance in accessing suitable housing.
3. The project may provide assistance with moving costs.
4. The project signs occupancy agreements or leases (or subleases) with all project participants residing in housing.
5. The project enters into an occupancy agreement or lease agreement (or sublease) with project participant for a term of at least once year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month. Assistance may be extended as stated in 24 CFR 578.79.
6. For projects where regulations require individuals and families residing in permanent supportive housing to pay occupancy charges or rent, occupancy charges and rent may not exceed those specified in 24 CFR 578.77.
7. At least 90 percent of the CoC Program-funded permanent supportive housing beds that become available through turnover must be prioritized for chronically homeless individuals and families, or are in projects classified as DedicatedPLUS as defined in III.C.2.g. of HUD's 2022 CoC Program Competition NOFO. However, CoC-funded PSH projects that commit above this amount in a competition, are held to the higher amount.

In terminating assistance to a program participant, the interim rule provides that a recipient or subrecipient must provide a formal process that recognizes the due process of law. Recipients or subrecipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all circumstances in determining whether termination is appropriate. Under the Continuum of Care Interim Rule, it was determined that a participant's assistance should be terminated only in the most severe cases.

Required Documentation

As defined in the HEARTH Act, eligibility for Permanent Supportive Housing is limited to categories 1 and 4 (Fleeing/Attempting to Flee DV) if they also meet the definition in Category 1. Participants must also:

- a. Enter from the street or shelter, or a transitional housing project to which they originally entered from the street or shelter (NOTE: if the project is designated for chronically homeless, they may only enter from the street or shelter. Individuals may

lose their chronically homeless designation after they are enrolled into a transitional housing project); and

- b. The head of household, or at least one member of the household, must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition*.

*HUD's Sample Chronic Homelessness Documentation – 2016 guidance, which includes a list of acceptable documentation to verify disability status, can be found at:

<https://www.hudexchange.info/resource/5182/sample-chronic-homelessness-documentation-checklist/>

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach or intake worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution – one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a Third-Party Verification, the case file must include documentation of due diligence to obtain third party verification. Appendix VI provides more details on exactly what is needed in the case file.

For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/Prioritization

Permanent Supportive Housing Projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures.

Recipients of CoC Program-funded PSH are required to follow the order of priority when selecting participants for housing in accordance with the OH-501 Toledo/Lucas County CoC's written standards while also considering the goals and any identified target populations served by the project in a manner that is consistent with their current grant agreement. These standards and the order of priority is listed below, and the OH-501 Toledo/Lucas County CoC approved Permanent Supportive Housing Written Standards and Chronic Prioritization policy is located in Appendix VI of this document.

Note: Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Permanent Supportive Housing. Such individual or family shall meet all eligibility criteria required by Federal law or regulation or HUD NOFO, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project.

The individual or family shall retain their original homeless or chronically homeless status for the transfer.

A. *Order of Priority in CoC Program-funded Permanent Supportive Housing Beds Dedicated to Persons Experiencing Chronic Homelessness and Permanent Supportive Housing Prioritized for Occupancy by Persons Experiencing Chronic Homelessness.*

First Priority

Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs

Second Priority

Chronically Homeless Individuals and Families with the Longest History of Homelessness

Third Priority

Chronically Homeless Individuals and Families with the Most Severe Service Needs

Fourth Priority

All Other Chronically Homeless Individuals and Families

Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness

First Priority

Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

Second Priority

Homeless Individuals and Families with a Disability with Severe Service

Needs Third Priority

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs

Fourth Priority

Homeless Individuals and Families with a Disability Coming from Transitional Housing

The OH-501 Toledo/Lucas County CoC adopts HUD's Notice CPD-16-11, Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing Notice issued on July 25, 2016, in that those experiencing chronic homelessness should be

given priority for non-dedicated PSH beds as vacancies become available through turnover. PSH renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance abuse issues) must continue to serve those groups, as required in the current grant agreement. However, the chronically homeless within the specified subpopulation should be prioritized for entry as described below. The full notice, which includes related recordkeeping requirements can be found at:

<https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons->

[experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/](#) . This policy supersedes previous policy adopting Notice CPD-14-012.

Prioritization of DedicatedPLUS Projects When There Are No Eligible Households

At the point in which a vacancy occurs, if there are no eligible households identified who are ready to accept assistance, recipients should consider the following:

- Where there are no chronically homeless persons identified, Dedicated PSH beds included in DedicatedPLUS projects may fill the vacancy either in accordance with section III.B.1.(b)-(d) of Notice CPD-16-11 or households eligible for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2022 CoC Program NOFO.
- Where there are no persons meeting the eligibility criteria for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2022 CoC Program NOFO, recipients should follow the order of priority outlined in section III.B.1.(b)-(d) of Notice CPD-16-11 to fill any vacancies. At a minimum, the CoC should consider the total length of time the potential program participant has been residing in a place not meant for human habitation, emergency shelter, or safe haven and severity of service needs.
- The recipient must always continue to prioritize households that are eligible for DedicatedPLUS (and dedicated PSH, if applicable). This means that anytime there is a new vacancy, the recipient must always first seek to fill it with an eligible household even if it was most recently used to serve a household that would not otherwise be eligible due to the circumstances outlined above.

For purposes of prioritization as referenced above in Section III.B.1.(b)-(d) of Notice CPD-16-11 (referenced from Appendix VIII of this document), the required order of prioritization is as follows for DedicatedPLUS projects, when there are no eligible households:

First Priority

Homeless Individuals and Families with a Disability with Severe Service

Needs Second Priority

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs

Third Priority

Homeless Individuals and Families with a Disability Coming from Transitional Housing

The overarching goal of adopting this Notice is to ensure that the homeless individuals and families with the most severe service needs within a community are prioritized in all PSH, which will also increase progress towards the OH-501 Toledo/Lucas County CoC's goal of ending chronic homelessness. This will also guide projects in ensuring that all CoC Program-funded PSH beds are used most effectively. HUD's Notice CPD-16-11, and this policy, revises the orders of priority related how persons should be selected for PSH as previously established in Notice CPD-14-012 to reflect the changes to the definition of chronically homeless as defined in the Chronically

Homeless final rule.

Due diligence must be exercised when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their initial length of time homeless and/or the severity of their needs in the OH-501 Toledo/Lucas County CoC. Consistent with HUD's expectations for recipients of dedicated permanent supportive housing (PSH) projects, recipients of DedicatedPLUS projects will be expected to exercise due diligence when conducting outreach and assessment to locate and engage eligible households. HUD and the OH-501 Toledo/Lucas County CoC recognize that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing. Recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to maximum extent practicable, and recipients of DedicatedPLUS projects should be following a Housing First approach to the maximum extent practicable.

Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs. Street outreach and housing providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

Recordkeeping Recommendations for the Orders of Priority in this Notice:

24 CFR 578.103(a)(4) of the [CoC Program Interim Rule](#) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, the OH-501 Toledo/Lucas County CoC expects that CoC recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

- A. **Evidence of Severe Service Needs.** Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Appendix VI of the Written Standards using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.
- B. **Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance.** Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new project participants into the project.
- C. **Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.**

- a. When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.
- b. When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.
- c. Documentation for DedicatedPLUS Projects: Recipients of DedicatedPLUS PSH projects must maintain records to document efforts to locate persons meeting the eligibility criteria in Section III.C.2.g of the FY 2022 CoC Program NOFO. Ideally, the CoC should have comprehensive and high- quality data on all households that are currently presenting for assistance within the CoC that is informed by a comprehensive outreach strategy. To justify serving a non-eligible household, a recipient of DedicatedPLUS projects must have documentation from the CoC that demonstrates that outreach is occurring regularly and that the CoC is making reasonable efforts to locate and identify all persons experiencing homelessness within the community.

Appendix I: HUD Definition for “Homeless” Individual or Family

HUD CRITERIA FOR DEFINING HOMELESSNESS	Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing (only for ESG) and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or • Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering • that institution
	Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> • Residence will be lost within 14 days of the date of application for homeless assistance; • No subsequent residence has been identified; and • The individual or family lacks the resources or support networks needed to obtain other permanent housing

<p>Category 3</p>	<p>Homeless under other Federal statutes</p>	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> • Are defined as homeless under the other listed federal statutes; • Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; • Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and • Can be expected to continue in such status for an extended period of time due to special needs or barriers
<p>Category 4</p>	<p>Fleeing/ Attempting to Flee DV</p>	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> • Is fleeing, or is attempting to flee, domestic violence; • Has no other residence; and • Lacks the resources or support networks to obtain other permanent housing

Appendix II: HUD Definition for “At Risk of Homelessness”:

HUD DEFINITION FOR AT-RISK OF HOMELESSNESS	<p>Category 1</p>	<p>Individuals and Families</p>	<p>An individual or family who:</p> <p>Has an annual income below 30% of median family income for the area; AND</p> <p>Does not have sufficient resources or support networks, e.g. family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND</p> <p>Meets one of the following conditions:</p> <p>A. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding their application for assistance; OR</p> <p>B. Is living in the home of another because of economic hardship; OR</p> <p>C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance; OR</p> <p>D. Lives in a hotel or motel and the cost of the hotel or motel stay is not covered by any federal, State, or local government programs for low-income assistance: OR</p> <p>E. Lives in a single-room occupancy or efficiency apartment unit in which there resides more than 2 persons or lives in a larger housing unit in which there reside more than 1.5 persons per room; OR</p> <p>F. Is exiting a publicly funded institution, or system of care;</p> <p>OR</p> <p>G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the recipient’s approved Consolidated Plan.</p>
	<p>Category 2</p>	<p>Unaccompanied Children and Youth</p>	<p>A child or youth who does not qualify as homeless under HUD’s “homeless” definition but qualifies as homeless under another federal statute as outlined in the CoC Interim Rule at 578.3.</p>

	Category 3	Families with Children and Youth	A child or youth who does not qualify as “homeless” under HUD’s homeless definition but does qualify as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with her or him.
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Appendix III: Eligibility by Component (CoC Program)

ELIGIBILITY BY COMPONENT (CoC Program-funded Projects)	Supportive Services	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in SSO projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3* – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV
	Rapid Re-housing	<p>Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1) <p>ESG-funded RRH projects have the following additional limitations on eligibility:</p> <ul style="list-style-type: none"> • Must only serve individuals and families that have an annual income at or below 50% of AMI
	Transitional Housing	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in TH projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3* – Homeless Under Other Federal Statutes (N/A OH-501 Toledo/Lucas County CoC*) • Category 4 – Fleeing/Attempting to Flee DV

Permanent Supportive Housing	<p>Individuals and families defined as Homeless under the following categories are eligible for assistance in PSH projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV <p>PSH projects have the following additional NOFO limitations on eligibility within Category 1:</p> <ul style="list-style-type: none"> • Individuals and Families coming from TH must have originally come from the streets or emergency shelter • Individuals and Families must also have an individual family member with a disability <p>Projects that are dedicated chronically homeless projects, including those that were originally funded as Samaritan Bonus Initiative Projects must continue to serve chronically homeless persons exclusively</p>
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* Projects must be located within a CoC that has received HUD approval to serve this category. For more information about receiving HUD approval, please read: Notice on Limitation on Use of Funds to Serve Persons Defined as Homeless Under Other Federal Laws at: <https://www.hudexchange.info/resource/1988/notice-limitation-use-funds-serve-persons-defined-homeless-other-laws/>. Category 3 is not applicable for OH-501 Toledo/Lucas County CoC-funded programs.

Appendix IV: Eligibility by Category (Emergency Solutions Grant Program)

ELIGIBILITY BY COMPONENT (Emergency Solutions Grants) Street Outreach	<p>Individuals defined as Homeless under the following categories are eligible for assistance in SO:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1) <p>SO projects have the following additional limitations on eligibility within Category 1:</p> <ul style="list-style-type: none"> • Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter
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Emergency Shelter	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in ES projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3 – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV
Rapid Re- housing	<p>Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1) <p>ESG-funded RRH projects have the following additional limitations on eligibility:</p> <ul style="list-style-type: none"> • Must only serve individuals and families that have an annual income at or below 50% of AMI

Homelessness Prevention	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in HP projects:</p> <ul style="list-style-type: none"> • Category 2 –Imminent Risk of Homeless • Category 3 – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV <p>Individuals and Families who are defined as At Risk of Homelessness are eligible for assistance in HP projects.</p> <p>HP projects have the following additional limitations on eligibility with homeless and at risk of homeless:</p> <ul style="list-style-type: none"> • Must only serve individuals and families that have an annual income below 30% of AMI
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Appendix V: Eligibility Documentation Requirements for ESG and CoC Program-funded Projects

As set forth in the HEARTH Act, there are four categories of eligibility: 1) Literally Homeless, 2) Imminent Risk of Homelessness, 3) Homeless Under Other Federal Statutes (subject to limitation in the OH-501 Toledo/Lucas County CoC), and 4) Fleeing/Attempting to Flee Domestic Violence. Projects located within the OH-501 Toledo/Lucas County Continuum of Care jurisdiction are limited to serving categories 1, 2, and 4 due to the shortage of resources for those priority populations and excessive demand. Category two is further limited to those who will be literally homeless within

14 days, aligning eligibility with the Emergency Solutions Grant. Documentation for those at risk of homelessness may also be accepted as allowed under Category 1: Risk Factor (C) of the At Risk of Homelessness definition as allowed by HUD.

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as noted in the table on the following page:

ELIGIBILITY DOCUMENTATION/RECORDKEEPING REQUIREMENTS	<p>Category 1</p>	<p>Literally Homeless</p>	<p>a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); OR</p> <p>b. Written observation by an outreach worker; OR</p> <p>c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</p> <p>d. For individuals exiting an institution – one of the forms of evidence above and;</p> <p>i. Discharge paperwork or written/oral referral, or</p> <p>ii. Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited the institution</p> <p>If the provider is using anything other than Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.</p>
	<p>Category 1: Risk Factor (C)</p>	<p>Category 1: Risk Factor (C) of the At-Risk of Homelessness</p>	<p>Eligibility documentation for Category 1: Risk Factor (C) of the At-Risk of Homelessness definition does not need to be equivalent to a court- ordered eviction action. Acceptable documentation must substantiate that a household’s right to occupy housing will be terminated within 21 days, not necessarily that the household will be required to leave the unit within 21 days.</p> <p>In order to sufficiently document that the criteria for Category 1C have been met, other documentation, such as an eviction notice prepared by the landlord or a demand notice, must effectively terminate a household’s right to occupy the unit within 21 days. If the documentation provides a way for the tenant to remedy the situation and avoid eviction, e.g., paying the balance, the applicant must lack the ability to meet the terms of avoiding eviction in order to be eligible for assistance.</p>

Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> a. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; OR b. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; OR c. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; AND d. Certification that no subsequent residence has been identified; <p style="text-align: center;">AND</p>
		<ul style="list-style-type: none"> e. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.
Category 3	Homeless under other Federal statutes	<p>CoC-funded projects - N/A (Ineligible)</p> <p>ESG-funded projects (ONLY shelter or prevention IF allowed):</p> <ul style="list-style-type: none"> i. Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; AND ii. Certification of no PH in the last 60 days; AND iii. Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the last 60 days; AND iv. Documentation of special needs or 2 or more barriers

	<p>Category 4</p>	<p>Fleeing/ Attempting to Flee DV</p>	<p>For victim service providers:</p> <ul style="list-style-type: none"> i. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self- certification or a certification by the intake worker. <p>For non-victim service providers:</p> <ul style="list-style-type: none"> i. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; AND ii. Certification by the individual or head of household that no subsequent residence has been identified; AND iii. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
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Appendix. VI: Permanent Supportive Housing Written Standards & Chronic Prioritization

PERMANENT SUPPORTIVE HOUSING PROJECTS (PSH)

Permanent Supportive Housing (PSH) projects provide community-based housing and supportive services, without a predetermined length of stay, to assist homeless persons with a disability to live independently.

STANDARD:

The project will provide safe, affordable housing that meets participants' needs in accordance with HUD guidelines for permanent supportive housing projects.

SERVICE PROVISION CRITERIA:

2. In providing or arranging for housing, the project considers the needs of the individual or family experiencing homelessness.
3. The project provides assistance in accessing suitable housing.
4. The project may provide assistance with moving costs.
5. The project signs occupancy agreements or leases (or subleases) with all project participants residing in housing.
6. The project enters into an occupancy agreement or lease agreement (or sublease) with project participant for a term of at least once year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month. Assistance may be extended as stated in 24 CFR 578.79.
7. For projects where regulations require individuals and families residing in permanent supportive housing to pay occupancy charges or rent, occupancy charges and rent may not exceed those specified in 24 CFR 578.77.
8. At least 90 percent of the CoC Program-funded permanent supportive housing beds that become available through turnover must be prioritized for chronically homeless individuals and families, or are in projects classified as DedicatedPLUS as defined in III.C.2.g. of HUD's 2022 CoC Program Competition NOFO. However, CoC-funded PSH projects that commit above this amount in a competition, are held to the higher amount.

ELIGIBILITY CRITERIA:

In order to be served in a CoC-funded PSH project (individuals or family households) participants must meet the following program eligibility requirements:

- Participants must meet the applicable HUD definition of homelessness (category 1 or category 4); and
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability.

ELIGIBILITY CRITERIA FOR DedicatedPLUS Projects (Section III.C.2.g of the FY 2022 CoC Program NOFO): A DedicatedPLUS project is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless

youth that at intake are:

1. Experiencing chronic homelessness as defined in 24 CFR 578.3;
2. Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
3. Residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
4. residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
5. residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
6. receiving assistance through a Department of Veterans Affairs(VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

Priority is given to chronically homeless individuals and families as defined by HUD, where a family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of the chronically homeless definition as described on page 6 of this appendix, including a family whose composition has fluctuated while the head of household has been homeless. Please note that to meet the criteria set forth in the chronically homeless definition, in addition to meeting criteria around literal homelessness and length of time homeless, the statutory definition also requires that the head of household has a diagnosable disability as determined in the final rule.

Recipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all circumstances in determining whether termination is appropriate. Under the Continuum of Care Interim Rule, it was determined that a participant's assistance should be terminated only in the most severe cases.

The OH-501 Toledo/Lucas County CoC adopts HUD's Notice CPD-16-11, Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing Notice issued on July 25, 2016, in that those experiencing chronic homelessness should be given priority for non-dedicated PSH beds as vacancies become available through turnover. PSH renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance abuse issues) must continue to serve those groups, as required in the current grant agreement. However, the chronically homeless within the specified subpopulation should be prioritized for entry as described below.

As updated in HUD's 2022 CoC Program Competition NOFO, a permanent supportive housing bed that is dedicated specifically for use by chronically homeless individuals and families within a CoC's geographic area, as reported in the CoC's HIC and the FY 2022 PH project applications, must be filled by another chronically homeless participant unless there are no chronically homeless persons located within the CoC's geographic area. This concept only applies to permanent supportive housing projects. This policy update is being made to policy adopting Notice CPD-16-11. Additional information can be found within the full notice at: <https://www.hud.gov/sites/documents/16-11CPDN.PDF>.

The overarching goal of adopting this Notice is to ensure that the homeless individuals and families with the most severe service needs within a community are prioritized in all PSH, which will also increase progress towards the OH-501 Toledo/Lucas County CoC's goal of ending chronic homelessness. This will also guide projects in ensuring that all CoC Program-funded PSH beds are used most effectively.

HUD's Notice CPD-16-11, and this policy, revises the orders of priority related how persons should be selected for PSH as previously established in Notice CPD-14-012 to reflect the changes to the definition of chronically homeless as defined in the Chronically Homeless final rule.

Recipients of CoC Program-funded PSH are required to follow the order of priority when selecting participants for housing in accordance with the OH-501 Toledo/Lucas County CoC's written standards while also considering the goals and any identified target populations served by the project, in a manner consistent with their current grant agreement.

Due diligence must be exercised when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs in the OH-501 Toledo/Lucas County CoC. Consistent with HUD's expectations for recipients of dedicated permanent supportive housing (PSH) projects, recipients of DedicatedPLUS projects will be expected to exercise due diligence when conducting outreach and assessment to locate and engage eligible households as outlined in Section III.C.2.g. of the FY 2022 CoC Program NOFO. HUD and the OH-501 Toledo/Lucas County CoC recognize that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing.

Recipients of CoC Program- funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH.

CoC Program-funded PSH providers are encouraged to follow a Housing First approach to maximum extent practicable, and recipients of DedicatedPLUS projects should be following a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs.

Street outreach and housing providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

PRIORITIZATION of CHRONICALLY HOMELESS

Order of Priority in CoC Program-funded Permanent Supportive Housing

As a reminder, recipients of CoC Program-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Project implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

Note: Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Permanent Supportive Housing. Such individual or family shall meet all eligibility criteria required by Federal law or regulation or HUD NOFO, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project. The individual or family shall retain their original homeless or chronically homeless status for the transfer.

A. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic.

First Priority:

Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.

A chronically homeless individual or head of household as defined in 24 CFR Parts 91 and 578, for whom both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and
2. The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs (see Section I.D.3. of this Notice for definition of severe service needs).

Second Priority:

Chronically Homeless Individuals and Families with the Longest History of Homelessness.

A chronically homeless individual or head of household, as defined in 24 CFR Parts 91 and 578, for which both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,

2. The CoC or CoC program recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Third Priority:

Chronically Homeless Individuals and Families with the Most Severe Service Needs.

A chronically homeless individual or head of household as defined in 24 CFR Parts 91 and 578, for whom both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than 12 months; and
2. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Fourth Priority:

All Other Chronically Homeless Individuals and Families.

A chronically homeless individual or head of household as defined in 24 CFR Parts 91 and 578, for whom both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length the four occasions is **less than** 12 months; and
2. The CoC or CoC program recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Where a CoC or a recipient of CoC Program-funded PSH beds that are dedicated or prioritized is not able to identify chronically homeless individuals and families as defined in 24 CFR Parts 91 and 578 within the CoC, the order of priority in the section below (*B. Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness*) may be followed.

B. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

First Priority:

Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

Second Priority:

Homeless Individuals and Families with a Disability Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Third Priority:

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Fourth Priority:

Homeless Individuals and Families with a Disability Coming from Transitional Housing.

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

C. Prioritization of DedicatedPLUS Projects When There Are No Eligible Households

At the point in which a vacancy occurs, if there are no eligible households identified who are ready to accept assistance, recipients should consider the following:

- Where there are no chronically homeless persons identified, Dedicated PSH beds included in DedicatedPLUS projects may fill the vacancy *either* in accordance with section III.B.1.(b)-(d) of Notice CPD-16-11 or households eligible for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2022 CoC Program NOFO.
- Where there are no persons meeting the eligibility criteria for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2022 CoC Program NOFO, recipients should follow the order of priority outlined in section III.B.1.(b)-(d) of Notice CPD-16-11 to fill any vacancies. At a minimum, the CoC should consider the total length of time the potential program participant has been residing in a place not meant for human habitation, emergency shelter, or safe haven and severity of service needs.
- The recipient must always continue to prioritize households that are eligible for DedicatedPLUS (and dedicated PSH, if applicable). This means that anytime there is a new vacancy, the recipient must always first seek to fill it with an eligible household even if it was most recently used to serve a household that would not otherwise be eligible due to the circumstances outlined above.

For purposes of prioritization as referenced above in Section III.B.1.(b)-(d) of Notice CPD-16-11 (referenced from Appendix VIII of this document), the required order of prioritization as follows for DedicatedPLUS projects, when there are no eligible households:

First Priority:

Homeless Individuals and Families with a Disability Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Second Priority:

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Third Priority:

Homeless Individuals and Families with a Disability Coming from Transitional Housing.

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This

priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

PROCEDURE:

Permanent Supportive Housing Projects will be required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures.

Key Terms:

Homeless means (To be eligible for permanent supportive housing, people must meet the federal criteria under category [1] or [4] of the “homeless” definition in 24 578.3):

- 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Disabling Condition (Disability) means:

- A person shall be considered to have a disabling condition if he or she has a condition that:
 - Is expected to be long-continuing or of indefinite duration;
 - Substantially impedes the individual’s ability to live independently;
 - Could be improved by the provision of more suitable housing conditions; and
 - Can be diagnosed as one or more of the following conditions: substance abuse disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability (page 53, CoC Interim Rule).
- A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).

Chronically Homeless means:

- A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - o Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - o Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a

break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

- An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering that facility; or
- A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition described above, including a family whose composition has fluctuated while the head of household has been homeless.

HUD's *Sample Chronic Homelessness Documentation – 2016* guidance can be found at: <https://www.hudexchange.info/resources/documents/Sample-Chronic-Homelessness-Documen-tation- Form- 2016.docx>.

Housing First means:

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold). HUD encourages all recipients of CoC Program- funded PSH to follow a Housing First approach to the maximum extent practicable.

Any CoC-funded recipient/subrecipient that indicated that they would follow a Housing First approach in a CoC Project Application must continue to do so in subsequent years, as the CoC score for that CoC Program Competition was affected by the extent in which project applications indicated that they would follow this approach and this requirement will be incorporated into the recipient's HUD grant agreement.

Severity of Service Needs means (as defined in HUD Notice CPD-16-11, these PSH written standards refer to persons who have been identified as having the most severe service needs):

- (a) For the purpose of these standards, this means an individual for whom at least one of the following is true:
- i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or
 - ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
 - iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
 - iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

(b) Severe service needs as defined in paragraphs i. - iv. above should be identified and verified through data- driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a project participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see C.F.R.

§ 5.105(a). [Recordkeeping Recommendations for the Orders of Priority in this Notice:](#)

24 CFR 578.103(a)(4) of the [CoC Program Interim Rule](#) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, the OH-501 Toledo/Lucas County CoC expects that CoC recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

A. **Evidence of Severe Service Needs.** Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in this section of the Written Standards using data- driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.

B. **Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance.** Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new project participants into the project.

C. *Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.*

(a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.

(b) When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area - that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.

(c) Documentation for DedicatedPLUS Projects: Recipients of DedicatedPLUS PSH

projects must maintain records to document efforts to locate persons meeting the eligibility criteria in Section III.C.2.g of the FY 2022 CoC Program NOFO. Ideally, the CoC should have comprehensive and high- quality data on all households that are currently presenting for assistance within the CoC that is informed by a comprehensive outreach strategy. To justify serving a non-eligible household, a recipient of DedicatedPLUS projects must have documentation from the CoC that demonstrates that outreach is occurring regularly and that the CoC is making reasonable efforts to locate and identify all persons experiencing homelessness within the community.

Appendix VII: Recordkeeping Requirements Documenting “Chronic Homelessness”

RECORDKEEPING REQUIREMENTS TO DOCUMENT CHRONIC HOMELESSNESS	Documenting time spent living in a place not meant for human habitation, an emergency shelter, or a safe haven	<ul style="list-style-type: none"> a. Third party verification (HMIS print-out, written observation by an outreach worker of the conditions where the individual was living, or written referral/certification by another housing or service provider) should be obtained for at least 9 of the required 12 month homeless period; b. Up to 3 months of homelessness may be documented through self- certification; c. A single encounter with a service provider in a month is sufficient to consider the household homeless for the entire month unless there is evidence of a break; d. If third party documentation cannot be obtained, a written record of the intake worker’s due diligence to obtain it, the worker’s documentation of the living situation, and the individual’s self- certification may suffice; e. Up to 25% of the participants served during the project’s operating year may self-certify for the full 12 months but this should be limited to rare and extreme cases and the intake worker must document their due diligence in obtaining other documentation and why it was not received.
	Documenting time spent in institutions	<ul style="list-style-type: none"> a. Discharge paperwork or written or oral referral from a social worker, case manager, or other appropriate official stating the beginning and ending dates of the individual’s stay in the facility; OR b. Where third party verification is not attainable, the written record of the intake worker’s due diligence to obtain it and the individual’s self- certification that he or she is exiting an institutional care facility where they resided less than 90 days.
	Documenting breaks in homelessness	<ul style="list-style-type: none"> a. Third party verification; OR b. Self-reporting by the individual seeking assistance. It is acceptable for all breaks to be documented through self-reporting.

	Documenting the existence of a disability	<p>This must be third party, and includes:</p> <ul style="list-style-type: none"> a. Written verification form a professional licensed by the State to diagnose and treat the disability and certification that the disability expected to be long- continuing or of indefinite duration and substantially impedes the individual’s ability to live independently; OR b. Written verification from SSA; OR c. The receipt of a disability check; OR d. Intake staff recorded observation of a disability that is confirmed and accompanied by evidence outlined in a-c above within 45 days.
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Recipients and subrecipients of CoC Program funds are required to maintain and follow written intake procedures to ensure compliance with the “chronically homeless” definition as described in the final rule at: <https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/>

Appendix VIII: HUD CPD-16-11 Notice Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing



U.S. Department of Housing and Urban Development Office of
Community Planning and Development

1

Special Attention of:

All Secretary's Representatives

Issued:

All Regional Directors for CPD

Expires:

All CPD Division

Directors

Continuums of

Care (CoC)

Recipients of the Continuum of Care (CoC) Program

Issued: July 25, 2016

Expires: This Notice is effective until it is amended, superseded, or rescinded

Cross Reference: 24 CFR Parts 578 and 42 U.S.C. 11381, *et seq.*

Subject: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing

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I. Purpose

This Notice supersedes Notice CPD-14-012 and provides guidance to Continuums of Care (CoC) and recipients of Continuum of Care (CoC) Program (24 CFR part 578) funding for permanent supportive housing (PSH) regarding the order in which eligible households should be served in **all** CoC Program-funded PSH. This Notice reflects the new definition of chronically homeless as defined in CoC Program interim rule as amended by the Final Rule on Defining “Chronically Homeless” (herein referred to as the Definition of Chronically Homeless final rule) and updates the orders of priority that were established under the prior Notice. CoCs that previously adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the FY2015 CoC Program Competition are encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. CoCs that have not previously adopted the orders of priority established in Notice CPD- 14-012 are also encouraged to incorporate the orders of priority included in this Notice into their written standards

A. Background

In June 2010, the Obama Administration released *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (Opening Doors)*, in which HUD and its federal partners set goals to end Veteran and chronic homelessness by 2015, and end family and youth homelessness by 2020. Although progress has been made there is still a long way to go. In 2015, the United States Interagency Council on Homelessness extended the goal timeline for achieving the goal of ending chronic homelessness nationally from 2015 to 2017. In 2015, there were still 83,170 individuals and 13,105 persons in families with children that were identified as chronically homeless in the United States. To end chronic homelessness, it is critical that CoCs ensure that limited resources awarded through the CoC Program Competition are being used in the most effective manner and that households that are most in need of assistance are being prioritized.

Since 2005, HUD has encouraged CoCs to create new PSH dedicated for use by persons experiencing chronic homelessness (herein referred to as dedicated PSH). As a result, the number of dedicated PSH beds funded through the CoC Program for persons experiencing chronic homelessness has increased from 24,760 in 2007 to 59,329 in 2015. This increase has contributed to a 30.6 percent decrease in the number of chronically homeless persons reported in the Point-in-Time Count between 2007 and 2015. Despite the overall increase in the number of dedicated PSH beds, this only represents 31.6 percent of all CoC Program- funded PSH beds.

To ensure that all PSH beds funded through the CoC Program are used as strategically and effectively as possible, PSH needs to be targeted to serve persons with the highest needs and greatest barriers towards obtaining and maintaining housing on their own—persons experiencing chronic homelessness.

HUD's experience has shown that many communities and recipients of CoC Program- funded PSH

continue to serve persons on a "first-come, first- serve" basis or based on tenant selection processes that screen-in those who are most likely to succeed while screening out those with the highest level of need. These approaches to tenant selection have not been effective in reducing chronic homelessness, despite the increase in the number of PSH beds nationally.

B. Goals of this Notice

The overarching goal of this Notice is to ensure that those individuals and families who have spent the longest time in places not meant for human habitation, in emergency shelters, or in safe havens and who have the most severe service needs within a community are prioritized for PSH. By ensuring that persons with the longest histories of homelessness and most severe

service needs are prioritized for PSH, progress towards the Obama Administration's goal of ending chronic homelessness will increase. In order to guide CoCs in ensuring that all CoC Program- funded PSH beds are used most effectively, this Notice revises the orders of priority related to how persons should be selected for PSH as previously established in Notice CPD-14- 012 to reflect the changes to the definition of chronically homeless as defined in the Definition of Chronically Homeless final rule. CoCs are strongly encouraged to adopt and incorporate them into the CoC's written standards and coordinated entry process.

HUD seeks to achieve two goals through this Notice:

1. Establish a recommended order of priority for dedicated and prioritized PSH which CoCs are encouraged to adopt in order to ensure that those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service needs are given first priority.
2. Establish a recommended order of priority for PSH that is not dedicated or prioritized for chronic homelessness in order to ensure that those persons who do not yet meet the definition of chronic homelessness but have the longest histories of homelessness and the most severe service needs, and are therefore the most at risk of becoming chronically homeless, are prioritized.

C. Applicability

The guidance in this Notice is provided to all CoCs and all recipients and subrecipients of CoC Program funds—the latter two groups referred to collectively as recipients of CoC Program- funded PSH. CoCs are strongly encouraged to incorporate the order of priority described in this Notice into their written standards, which CoCs are required to develop per 24 CFR 578.7(a)(9), for their CoC Program-funded PSH.

Recipients of CoC Program funds are required to follow the written standards for prioritizing assistance established by the CoC (see 24 CFR 578.23(c)(10)); therefore, if the CoC adopts these recommended orders of priority for their PSH, all recipients of CoC Program-funded PSH will be required to follow them as required by their grant agreement. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Lastly, where a CoC has chosen to not adopt HUD's recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

D. Key Terms

1. **Housing First.** A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold). HUD encourages all recipients of CoC Program-funded PSH to follow a Housing First approach to the maximum extent practicable.
2. **Chronically Homeless.** The definition of "chronically homeless", as stated in Definition of Chronically Homeless final rule is:
 - (a) A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;
 - (b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;
 - (c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has

fluctuated while the head of household has been homeless.

- 3. Severity of Service Needs.** This Notice refers to persons who have been identified as having the most severe service needs.
- (a) For the purposes of this Notice, this means an individual for whom at least one of the following is true:
- i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or
 - ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
 - iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
 - iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high- need, high cost beneficiaries.
- (b) Severe service needs as defined in paragraphs i.-iv. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a program participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a)

II. Dedication and Prioritization of Permanent Supportive Housing Strategies to Increase Number of PSH Beds Available for Chronically Homeless Persons

- A. Increase the number of CoC Program-funded PSH beds that are dedicated to persons experiencing chronic homelessness.**

Dedicated PSH beds are those which are required through the project's grant agreement to only be used to house persons experiencing chronic homelessness unless there are no persons within the CoC that meet that criteria. If there are no persons within the CoC's geographic area that meet the definition of chronically homeless at a point in which a dedicated PSH bed is vacant, the recipient may then follow the order of priority for non- dedicated PSH established in this Notice, if it has been adopted into the CoC's written standards. The bed will continue to be a dedicated bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the CoC's geographic area at that time. These PSH beds are also reported as "CH Beds" on a CoC's Housing Inventory Count (HIC).

- B. Prioritize non-dedicated PSH beds for use by persons experiencing**

chronic homelessness.

Prioritization means implementing an admissions preference for chronically homeless persons for CoC Program-funded PSH beds. During the CoC Program competition project applicants for CoC Program-funded PSH indicate the number of non-dedicated beds that will be prioritized for use by persons experiencing chronic homelessness during the operating year of that grant, when awarded. These projects are then required to prioritize chronically homeless persons in their non-dedicated CoC Program-funded PSH beds for the applicable operating year as the project application is incorporated into the grant agreement. All recipients of non-dedicated CoC Program-funded PSH are encouraged to change the designation of their PSH to dedicated, however, at a minimum are encouraged to prioritize the chronically homeless as beds become vacant to the maximum extent practicable, until there are no persons within the CoC's geographic area who meet that criteria. Projects located in CoCs where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified area.

For example, if a OH-501 Toledo/Lucas County CoC has chosen to divide the CoC into six distinct regions for purposes of planning and housing and service delivery, each region would only be expected to prioritize assistance within its specified geographic area.¹

The number of non-dedicated beds designated as being prioritized for the chronically homeless may be increased at any time during the operating year and may occur without an amendment to the grant agreement.

III. Order of Priority in CoC Program-funded Permanent Supportive Housing

The definition of chronically homeless included in the final rule on "Defining Chronically Homeless", which was published on December 4, 2015 and went into effect on January 15, 2016, requires an individual or head of household to have a disability and to have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for at least 12 months either continuously or cumulatively over a period of at least 4 occasions in the last 3 years. HUD encourages all CoCs adopt into their written standards the following orders of priority for all CoC Program-funded PSH. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Where a CoC has chosen to not incorporate HUD's recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

As a reminder, recipients of CoC Program-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Program implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

A. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

1. CoCs are strongly encouraged to revise their written standards to include an order of priority, determined by the CoC, for CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness that is based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual's or family's service needs. Recipients of CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness would be required to follow that order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.
2. Where there are no chronically homeless individuals and families within the CoC's geographic area, CoCs and recipients of CoC Program-funded PSH are encouraged to follow the order of priority in Section III.B. of this Notice. For projects located in CoC's where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified sub-CoC area. 2
3. Recipients of CoC Program-funded PSH should follow the order of priority above while also considering the goals and any identified target populations served by the project. For example, a CoC Program-funded PSH project that is permitted to target homeless persons with a serious mental illness should follow the order of priority under Section

III.A.1. of this Notice to the extent in which persons with serious mental illness meet the criteria. In this example, if there were no persons with a serious mental illness that also met the criteria of chronically homeless within the CoC's geographic area, the recipient should follow the order of priority under Section III.B for persons with a serious mental illness.

4. Recipients must exercise due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might

require significant engagement and contacts prior to their entering housing and recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

B. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

1. CoCs are strongly encouraged to revise their written standards to include the following order of priority for non-dedicated and non-prioritized PSH beds. If adopted into the CoCs written standards, recipients of CoC Program-funded PSH that is not dedicated or prioritized for the chronically homeless would be required to follow this order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.

(a) First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

(b) Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(c) Third Priority—Homeless Individuals and Families with a Disability

Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(d) Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing.

1. An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.
2. Recipients of CoC Program-funded PSH should follow the order of priority above, as adopted by the CoC, while also considering the goals and any identified target populations served by the project. For example, non-dedicated or non-prioritized CoC Program-funded PSH that is permitted to target youth experiencing homelessness should follow the order of priority under Section III.B.1. of this Notice, as adopted by the CoC, to the extent in which youth meet the stated criteria.
3. Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described in this Notice, and as adopted by the CoC. HUD recognizes that some persons— particularly those living on the streets or in places not meant for human habitation— might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH (see [FAQ 1895](#)). Recipients of CoC Program-funded PSH are encouraged to follow a Housing First approach to the maximum extent practicable. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these individuals and families must continue to be prioritized until they are housed.

IV. Using Coordinated Entry and a Standardized Assessment Process to Determine Eligibility and Establish a Prioritized Waiting List

A. Coordinated Entry Requirement

Provisions at 24 CFR 578.7(a)(8) requires that each CoC, in consultation with recipients of Emergency Solutions Grants (ESG) program funds within the CoC's geographic area, establish and operate either a centralized or coordinated assessment system (referred to in this Notice as coordinated entry or coordinated entry process) that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. CoCs that adopt the order of priority in Section III of this Notice into the CoC's written standards are strongly encouraged to use a coordinated entry process to ensure that there is a single prioritized list for all CoC Program-funded PSH within the CoC. The [Coordinated Entry Policy Brief](#), provides recommended criteria for a quality coordinated entry process and standardized assessment tool and process. Under no circumstances shall the order of priority be based upon diagnosis or disability type, but instead on the length of time an individual or family has been experiencing homelessness and the severity of needs of an individual or family.

B. Written Standards for Creation of a Single Prioritized List for PSH

CoCs are also encouraged to include in their policies and procedures governing their coordinated entry system a requirement that all CoC Program-funded PSH accept referrals only through a single prioritized list that is created through the CoCs coordinated entry process, which should also be informed by the CoCs street outreach. Adopting this into the CoC's policies and procedures for coordinated entry would further ensure that CoC Program-funded PSH is being used most effectively, which is one of the goals in this Notice. The single prioritized list should be updated frequently to reflect the most up-to-date and real-time data as possible.

C. Standardized Assessment Tool Requirement

CoCs must utilize a standardized assessment tool, in accordance with 24 CFR 578.3, or process. The [Coordinated Entry Policy Brief](#), provides recommended criteria for a quality coordinated entry process and standardized assessment tool.

D. Nondiscrimination Requirements

CoCs and recipients of CoC Program-funded PSH must continue to comply with the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities

Act, as applicable. See 24 C.F.R.
§ 5.105(a).

V. **Recordkeeping Recommendations for CoCs that have Adopted the Orders of Priority in this Notice**

24 CFR 578.103(a)(4) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, HUD expects that where CoCs have adopted the orders of priority in Section III. of this Notice into their written standards. The CoC, as well as recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

A. Evidence of Severe Service Needs. Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Section I.D.3. of this Notice using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case- conferencing decisions.

B. Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance. Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new program participants into the project.

C. Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.

(a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC 3planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this

condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.

- (b)** When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area - that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.

VI. Questions Regarding this Notice

Questions regarding this notice should be submitted to HUD Exchange Ask A Question (AAQ) Portal at:
<https://www.hudexchange.info/get-assistance/my-question/>.

³ For the State of Louisiana grant originally awarded pursuant to "Department of Housing and Urban Development— Permanent Supportive Housing" in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110–252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.

Toledo Homeless Management Information System (HMIS) Consolidated Policies and Procedures

Purpose of HMIS

The purpose of the Toledo HMIS project is to provide a robust and comprehensive system for collecting and disseminating information about persons experiencing homelessness and the homelessness service system in support of the Toledo-Lucas County Continuum of Care's goal to prevent, reduce, and eliminate homelessness.

We do this by assisting homelessness service providers in generating reports to the U.S. Department of Housing and Urban Development, the Toledo Lucas County Continuum of Care, and other funders, as well as streamlining and consolidating their internal tracking and record-keeping requirements.

I. Roles and Responsibilities

1. Project Management

The Toledo Lucas County Homelessness Board (TLCHB) is responsible for the HMIS project under the auspices of a TLCHB/HMIS Administrator. The HMIS Administrator is employed and supervised by TLCHB.

2. Project Staffing

The HMIS Administrator has primary responsibility for coordination and administration of the Toledo HMIS and reports to the TLCHB Chief Executive Officer (CEO).

3. Contributory HMIS Organizations

Any agency, group, or other entity that has completed an Agency Agreement with the HMIS Administrator is a Contributory HMIS Organization (CHO). All CHO's must abide by all policies and procedures outlined in this manual, which are subject to change. CHO's must complete a CHO Agreement with the HMIS Administrator on an annual basis. CHO's with expired CHO Agreements may have their End User accounts locked or removed to maintain the security, confidentiality, and integrity of the system. CHO's are responsible for the conduct of their End Users and the security of End User Accounts.

4. Project Agency Administrators

Each CHO will designate an HMIS Agency Administrator to serve as primary contact between the HMIS Administrator and the CHO, and each HMIS Agency Administrator must have a valid email address with the CHO. Each CHO should choose its HMIS Agency Administrator and send that person's name and contact information to the HMIS Administrator. Changes to that information should be promptly reported to the HMIS Administrator.

5. HMIS Advisory Committee

The CEO or designee will convene a committee to advise the project's operations, policies, and procedures and provide feedback on a regular basis. The CEO or designee will seek out particularly skilled individuals whose breadth and depth of expertise is well-suited to the project.

6. HMIS End Users

In addition to an HMIS Agency Administrator, CHO's must designate other individuals to access the system on their behalf, and CHO's are encouraged to use ServicePoint as their primary tool for client and service tracking, case management, and operational reporting. The HMIS Administrator will work with CHO's to determine the appropriate User Access Level designation for each End User.

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There is no upper limit to the number of End Users each CHO may authorize, but Toledo HMIS may assess participation fees to recover the cost of ServicePoint licenses.

All End Users, including HMIS Agency Administrators and HMIS staff, must complete an End User agreement with the HMIS Administrator on an annual basis. End User accounts with expired End User Agreements may be locked or removed to maintain the security, confidentiality, and integrity of the system.

7. Communication

General communications from the HMIS Administrator will be directed toward Agency Administrators. Specific communications will be addressed to the person or people involved. The Toledo HMIS Administrator will be available via email, phone, and U.S. mail. The ServicePoint Newsflash feature may also be used to distribute HMIS information.

Participating CHO's are responsible for communicating needs, questions, and concerns regarding the Toledo HMIS directly to the HMIS Administrator.

8. System Availability

Wellsky (formerly Medidata and Bowman Systems) will provide a highly available database server and will inform Toledo HMIS staff in advance of any planned interruption in service. Whenever possible, if the database server is unavailable due to disaster or routine maintenance, Toledo HMIS staff will inform End Users of the cause and duration of the interruption in service. The HMIS Administrator will log all downtime for purposes of system evaluation.

9. Client Grievances

Clients will contact the CHO with which they have a grievance for resolution of HMIS problems. CHO's will provide a copy of the Toledo HMIS Policies and Procedures Manual upon request, and respond to client issues. CHO's will send written notice to the HMIS Administrator of any HMIS-related client grievance. The HMIS Administrator will record all grievances and will report these complaints to the HMIS Advisory Committee.

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II. Security and Privacy Plan

1. Security Officer

Each CHO must designate an HMIS Security Officer to be responsible for ensuring compliance with applicable security standards. The Security Officer need not be an End User. The Security Officer must be an employee of the CHO. For any CHO with no employees, the Security Officer must be the President, Chair, or other top-level representative responsible for the CHO.

2. Workforce Security

Each CHO must have a workforce security policy that includes conducting a criminal background check on its Security Officer and on any users with Agency Director level access or greater. Criminal background checks must be completed at least once every five years. On request, CHOs must certify to Toledo HMIS when the most recent criminal background check has been completed for each applicable staff member. The background check must include local and state records; CHOs are strongly encouraged to include federal records as well.

3. Security and Privacy Awareness Training

Toledo HMIS will conduct a security and privacy awareness training on an annual basis, which will be required for all End Users and Security Officers. This training will cover relevant statutory and regulatory requirements, local policies, and best practices for HMIS security and privacy.

4. Disaster Recovery Plan

In the event of a disaster involving substantial loss of data or system downtime, Toledo HMIS will contact CHO Security Officers by phone or email within one business day to inform them of the expected scale and duration of the loss or downtime. Toledo HMIS will continue to inform CHO Security Officers as new information becomes available about the scale and duration of lost data or system downtime. In the event that loss of data is expected to exceed three business days of activity or system downtime is expected to exceed 24 hours, Toledo HMIS will begin to disclose estimates of loss and downtime to the public as well.

5. Annual Security Review

All CHOs must undergo an annual security review, which includes, at a minimum, completion of the following security checklist:

- a. Proper display of “Purpose of Data Collection” notice
- b. Workstation security as described in Section 10
- c. Policies for tracking “HMIS Disclosure” forms
- d. Certification of most recent background check for applicable personnel as described in Section 2; and
- e. Mobile Security Policy

Annual Security Review will be scored using a points system. CHOs that meet the required standards for security during the review will receive five (5) points. CHOs that do not meet the required standards initially but correct their findings in the mitigation time frame will receive five (5) points. CHOs that do not meet the security standards or fail to correct their findings in the mitigation timeframe will receive zero (0) points.

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6. Contracts and Other Arrangements

Toledo HMIS must retain copies of all contracts and agreements executed as part of the administration and management of HMIS or required to comply with the requirements of these policies.

7. Allowable Use and Disclosure of HMIS Data

Toledo HMIS will only collect client data relevant to the delivery of services to people experiencing homelessness, a housing crisis, or housing instability in Lucas County, Ohio.

a. Service Delivery

Client-level data may be stored and retrieved by CHOs when relevant to assessing program eligibility, providing services, and making corrections.

b. Reporting to Program Funders

Reports of client data in aggregate may be generated to satisfy the reporting requirements of certain program funders, including but not limited to:

- U.S. Department of Housing and Urban Development Emergency Solutions Grant Program;
- U.S. Department of Housing and Urban Development Continuum of Care Program
- U.S. Department of Health and Human Services Substance Abuse and Mental Health Services Administration (SAMHSA) and Family and Youth Services Bureau (FSBY) Programs; and
- State of Ohio Development Services Agency.

c. Planning and Analysis

Reports of client data in aggregate may be generated to improve planning and analysis of homelessness, housing crises, and related issues. These include local Continuum of Care planning efforts as well as national reports such as the Longitudinal System Analysis (LSA) Report to Congress, Point-in-Time Counts (PIT), Housing Inventory Chart (HIC), and the System Performance Measures (SysPM) including Data Quality Framework.

d. Coordinated Assessment

Reports of client data in aggregate, bed lists, or other availability may be generated to facilitate use of a Coordinated Assessment system.

e. Documentation of Homelessness

Client shelter stay records in HMIS may be used by CHOs as documentation of homelessness in accordance with guidance from HUD.

f. Data Quality

Reports of client data (individually or in aggregate) may be generated to assess and improve the quality of data being entered.

g. Troubleshooting

Toledo HMIS and Wellsky may from time to time access individual client-level data in order to manage system configuration, conduct special projects, troubleshoot system issues, and provide technical assistance.

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- h. Prohibition on CHO Transmission of Identifiable Client Data
Under no circumstances will CHOs transfer reports with readable or retrievable client-level identifying data. Any security breaches and consequences thereof due to violation of this prohibition will be the sole responsibility of the CHO.
- i. Data Integration and Warehousing
Client-level data may be exported and transferred from the designated Toledo HMIS system for use in research within an interagency data warehouse. Client-level data exported in this fashion will be accompanied by an obfuscated hash value to be used as a key for integrating data from multiple sources.
- j. Toledo HMIS Transmission of Identifiable Data
In order to further Continuum of Care (CoC) goals, Toledo HMIS may need, from time to time, to transmit unhashed, client-level personally identifiable information to tertiary entities. In these cases, data sharing agreements with non-disclosures will be implemented and any transmitted data will be encrypted to secure the data.

8. Openness of Data

Client-level data in HMIS will generally be Closed and not shared between CHOs unless specific consent is given by a client for data to be shared.

There are two routine exceptions to this general rule. First, any CHO who is performing Coordinated Assessment duties will always be able to search and find clients, regardless of which CHO first created the client record, in order to minimize duplication of client records. Second, any CHO to which Coordinated Assessment refers a client will be granted visibility of Client Identifiers and Coordinated Assessment information in order to transmit the referral, verify the identity of the referred client, and document eligibility for services.

9. Informed Client Participation

CHOs will display a Purpose of Data Collection Notice at all locations where HMIS data are collected from clients, and educate clients as to the purpose and scope of data collected and entered into HMIS.

10. Workstation Security

At a minimum, the primary workstation used by each End User to log in to ServicePoint should be configured to meet the following best practices:

- a. Password-protected log on for the workstation itself;
- b. Password-protected (aka locked) screensaver after five minutes or more of inactivity;
- c. Operating system updated with manufacturer's latest patches at least weekly;
- d. Ports firewalled;
- e. Using a currently supported browser and checking for updates regularly. The latest versions of Firefox, Chrome, Safari, and Edge qualify. Exceptions can be made when CHO non-HMIS activities needs a specific browser or version (e.g., Internet Explorer v9) but all other security measures must be maintained to mitigate increased security risks; and
- f. Systems scanned at least weekly for viruses and malware.

Toledo HMIS may provide recommendations or advise in pursuing these best practices, but proper workstation configuration remains the responsibility of each CHO.

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11. End User Accounts

The HMIS Administrator will provide an End User Account username and an initial password to each authorized End User. End User Accounts are assigned on a per-person basis, rather than to a particular position or role. End User Accounts are not to be exchanged, shared, or transferred between personnel at any time.

- a. **CHO Authority to Demand Usernames and Passwords**
Under no circumstances shall a CHO demand that an End User hand over his or her username and password. CHOs shall inform the HMIS Administrator of any changes in personnel or other requests to revoke or transfer accounts.
- b. **End User Password Security**
End User Account passwords must be changed every forty-five (45) days. Passwords should never be written on any item left in an office, desk, or other workspace, and passwords should never be in view of another person.
- c. **End User Inactivity**
End Users who have not logged into the system in the previous 90 days will be flagged as inactive. Inactive End Users may have their ServicePoint accounts locked or removed to maintain the security, confidentiality, and integrity of the system.

12. Prohibition on Client-level Data from Victim Services Providers

Projects which are primarily for survivors of domestic violence, dating violence, sexual assault, and stalking are prohibited from contributing client-level data into the designated HMIS System. However, these programs must record client-level data within a comparable internal database and be able to generate aggregate data for inclusion in reports as described in Section 7.

13. Reporting Security and Privacy Incidents

Any End User or Security Officer suspecting violations of Security and Privacy policies or other should report incidents in writing. Reports should include, at a minimum, the date, time, location, and personnel involved in the incident, along with a description of the suspected violation.

- a. Chain of Reporting
End Users should report issues first to their CHO's designated Security Officer within one business day. Security Officers, in turn, should report the issue jointly to the CHO director and Toledo HMIS Staff within one business day.
- b. Public Disclosure of Security Incidents
If a CHO is found to have committed a major violation as described in Section 14, the incident will be disclosed to the public along with the sanctions instituted in response.

14. Sanctions for Violations

- a. Minor Violations
Minor violations include but are not limited to:
 - End User or Security Officer absence at a required quarterly End User meeting or annual Security and Privacy Training, unless prior arrangements have been made for receiving missed training.
 - Workstations non-compliant with up to two Workstation Security items described in Section 10.

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The sanctions for minor violations are dependent on the number of minor violations by the CHO within a 24 month period.

- First violation
 - (a) A letter documenting violating event and involved personnel will be sent to CHO from Toledo HMIS and kept on-file with Toledo HMIS. CHO must submit to Toledo HMIS a written plan for corrective action, including any internal actions taken against employee who violated policy, within 10 business days and complete the corrective action within 30 days.
- Second violation
 - (a) A letter as described in “First violation” above.
 - (b) Toledo HMIS will conduct a mandatory training session on security and privacy policies for the CHO in question. This training must be attended by all end users, the CHO’s Security Officer, and the Security Officer supervisor or CHO CEO. In organizations where the Security Officer is the CEO, the training must be attended by the chair or president of the CHO’s board of directors.

b. Major Violations

Major violations include but are not limited to:

- Three or more minor violations within a 24 month period
- Failure to submit a written plan for corrective action for minor violations within 10 days
- Failure to complete corrective action for minor violations within 30 days
- Failure to conduct a criminal background check as described in Section 2
- Failure to participate in an Annual Security Review as described in Section 5
- Workstations non-compliant with three or more Workstation Security items as described in Section 10
- Failure to report security and privacy incidents as described in Section 13
- Transmitting Client Identifiers in plain text via unsecured or unencrypted e-mail

The sanction for a major violation is:

- A letter as described in “First violation” for minor violations above;
- A mandatory training as described in “Second violation” for minor violations above; and
- The End User violating the policy or procedure will be prohibited from accessing ServicePoint or participating in HMIS data collection for 90 days. The CHO remains responsible for meeting data quality and other obligations during this 90 day period.

c. Severe Violations

Severe violations include but are not limited to:

- Two or more major violations within a 24 month time period
- Sharing ServicePoint End User accounts
- End users leaving ServicePoint account credentials in plain view or unattended
- Improper access of client data beyond the scope outlined in Section 7

The sanction for a severe violation is:

- A letter as described in “First Violation” for minor violations above
- A mandatory training as described in “Second Violation” for minor violations above

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- The End User violating the policy or procedure will be prohibited from accessing ServicePoint or participating in HMIS data collection for one year
 - Toledo HMIS will levy a fine of one percent (1%) of the CHO's annual budget for activities reported on the Housing Inventory Chart, to a maximum of five hundred dollars (\$500). If a CHO has no activity on the Housing Inventory Chart, the fine will be calculated from their overall agency budget.
- d. Findings
The TLCHB HMIS Administrator will document any suspected finding of violation(s) and provide them to the TLCHB CEO. The CEO will issue notices to the CHO in question describing the finding of violation(s) and the associated sanction(s).
- e. Appeals
Findings of violations may be appealed, in writing, by the CHO in question. All appeals must be submitted in writing and should include any available supporting documentation. Appeals must be submitted within five (5) business days of the date the CHO received notice of the finding.
- Appeals for Minor Violations will be received and reviewed by the CEO. The CEO will issue a response within five (5) business days of receiving the appeal, including any amendments to the sanction(s).
 - Appeals for Major or Severe Violations will be received and reviewed by the Quality & Performance Committee, which will issue a response within thirty (30) calendar days of receiving the appeal, including any amendments to the sanction(s).

III. Data Quality Plan

1. Data Definitions

With the exception of custom fields used for Coordinated Assessment activity or other local data requests, Data Elements used by Toledo HMIS match those prescribed by HUD in their current Data Standards Manual and Data Dictionary which can be found at <https://www.hudexchange.info/programs/hmis/>. Data collected for Coordinated Entry and other local data requests can be found at <http://endinghomelessness Toledo.org/thmis/cho-resources>.

2. Required Data

CHO's will collect a required set of data elements for each client. The set of required data elements varies by project type or funding sources and individual data elements may not be required for all populations, as established in Section 1. For more information about the required data for each project type, please review the current Data Standards Manual and Data Dictionary which can be found at <https://www.hudexchange.info/programs/hmis/>. Local requirements for data collection by project type can be found at <http://endinghomelessness Toledo.org/thmis/cho-resources>.

3. Data Completeness

a. Program Entry Date and Program Exit Date

CHOs are responsible for completing 100% of their Program Entry Dates and Program Exit Dates for all clients served.

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b. All Other Data

CHOs are responsible for completing ninety-five percent (95%) or more of all other client-level data at entry, interim, exit, and aftercare/follow-up, where applicable.

4. Data Validity/Congruence

CHO's are responsible for providing data that is valid and congruent, meaning that the data should not contain contradictions or impossibilities. No more than one half of one percent (0.5%) of clients should exhibit any given incongruence case, which includes but is not limited to:

- a. Date of birth indicating negative age;
- b. Date of birth indicating age greater than one hundred years old;
- c. Date of birth same as date client was created in HMIS;
- d. Age inconsistent with household relationship (nine-year-old grandmother, etc.);
- e. Veteran status is yes but age is less than eighteen;
- f. Gender conflicts with household relationship (male grandmother);
- g. Listed as head of household but relationship to head of household is not "self";
- h. Not listed as head of household but relationship to head of household is "self";
- i. Household membership but no household relationship; and
- j. Client listed as pregnant but not a female between twelve and fifty-five years old.

5. HUD's Data Quality Framework Report (0640)

CHOs are responsible for providing data that is consistent with the completeness and timeliness standards in the HUD's Data Quality Framework Report. The Consistency Percentage should not drop below 85%.

No data element (listed below) should exceed 5% of error rate or calculability rate or in the case of timeliness, 90% of the data should be entered within six (6) days. Points will be awarded for each section of data according to the following principles:

- a. Section Q2. Personally Identifiable Information (PII): One (1) Point will be awarded for each of the six (6) data elements reported in the table where the error rate is less than 5%. The data elements are: Name, Social Security Number, Date of Birth, Race, Ethnicity, & Gender. The Overall Score is not used for this section.
- b. Section Q3. Universal Data Elements: One (1) point will be awarded for each of the five (5) data elements reported in the table where the error rate is less than 5%. The data elements are: Veteran Status, Project Entry Date, Relationship to Head of Household, Client Location, & Disabling Condition.
- c. Section Q4. Income and Housing Data Quality: One (1) point will be awarded for each of the four (4) data elements reported in the table where the error rate is less than 5%. The data elements are: Destination, Income and Sources at Entry, Income and Sources at Annual Assessment, & Income and Sources at Exit.
- d. Section Q5. Chronic Homelessness: One (1) point will be awarded for the Total Score if the % of Records Unable to Calculate does not exceed 5%.
- e. Section Q6. Timeliness: This section will not be scored at this time. However, HUD's commitment to timely data entry is recognized and important to Toledo HMIS.

The Consistency Percentage will be calculated by dividing the total points awarded by the total possible points (17 points). This percentage must exceed or equal 85%.

Toledo Homeless Management Information System (HMIS)

Consolidated Policies and Procedures

6. Monitoring and Evaluation

Toledo HMIS will periodically monitor and evaluate the Data Completeness and Validity of data along with consistency with HUD's Data Quality Framework. Data Completeness will be evaluated after each month, while Data Validity and HUD Consistency will be evaluated after each quarter.

a. Reporting Schedule

- All data for a reporting period should be completed within six (6) days of the collection point but no later than the fifth day of the following month;
- Toledo HMIS will provide preliminary reports of Data Completeness and Validity and the HUD Data Quality Framework (quarterly only) on the sixth day of the following month;
- Toledo HMIS will provide support to CHOs as needed for corrections of the previous reporting period's data and CHOs are expected to make any corrections by the tenth day of the following month;
- Toledo HMIS will provide a second, final report to each CHO on the eleventh day with updated figures; and
- Preliminary and Final reporting deadlines may be changed at the discretion of the HMIS Administrator with notification to the CHOs and End Users.

b. Performance Evaluation

CHO performance on Data Completeness, Data Validity and Data Quality Framework will be scored using a points system. CHOs who meet the required standard for Data Completeness will be awarded 1.50 points per month. CHOs who meet the required standard for Data Validity will be awarded 1.75 points per quarter. CHOs who meet the required standards for the Data Quality Framework will receive 1.0 points per quarter. The maximum number of points for Data Quality per calendar year is 29.00.

The annual security visit point total will be added to the Data Quality point total to arrive at the final point total with a maximum of 34.00. The final performance percentage will be calculated by dividing the total accrued points by the total possible points. All points will be reported on the CHO Tracker that is available on the TLCHB website at <http://endinghomelessnessstoleado.org/thmis/reports>.

c. Sanctions for Poor Performance

CHOs which consistently contribute low quality data may be required to receive additional training from Toledo HMIS, develop a written Data Quality Improvement Plan, and/or have End User Accounts suspended until appropriate action is taken to improve Data Quality. Ongoing poor performance will be documented and reported to Funding Programs and entities for review.

Toledo Lucas County Continuum of Care: Coordinated Entry Referral Process

Prepared by:

Carl Sutherland, HMIS Administrator, Toledo Lucas County Homelessness Board

Referral Components

The referral process begins with Coordinated Entry and continues with the TLCHB Homelessness Board (TLCHB) making a referral to a housing program for assistance. There are numerous components to the CoC's housing referral process that occur within TLCHB.

The following is an overview that provides the referral components. Additional details can be found in the subsequent sections of this manual.

1. Initial Contact
2. Determining Eligibility
3. Program Eligibility & Level of Assistance
4. Participating Project List
5. Referral Approach
6. Referral Communications & Tracking
7. Rejection Protocol
8. Referral Process for DV Victims
9. Referral Process for Veterans
10. Referral Process for Unaccompanied Youth

Initial Contact

Coordinated Entry: serving as the single, centralized point for access/entry

- 2-1-1 United Way
 - a. Individual calls 2-1-1: they can call 24 hours a day.
 - b. Community Navigation Specialist (CNS) assesses adult only household/households with children, determining their eligibility for shelter.
 - i. If eligible, CNS will conduct the necessary pre-screen, and send information to CE. For this, the Refer database is utilized.

- ii. If ineligible, CNS makes any other appropriate referrals.
- c. CNS verbally confirms family is stable for the night.
 - i. If so, they are told that CE will contact them within 1 business day.
 - ii. If not, a 2-1-1 supervisor is contacted, and subsequently contacts the CE staff on call. If it is an adult only household, outside shelters are given, and CE staff contacts the client back as soon as possible.
- d. When CE is given the information, CNS then transfers their information onto HMIS
- e. A call is then made to the client in order to complete housing crisis assessment and explain shelter process
 - i. If permission was previously given, CE staff will leave a message explaining the process.
 - ii. If CE staff is able to speak with client, assessment is completed, and CE gives any other referrals clients may need.
 - iii. If CE staff is unable to leave message, a follow-up is scheduled, and the client is contacted 3 times.
 - iv. Clients remain on list, until they either have refused shelter, or CE staff has attempted contact twice after housing crisis assessment has been completed.

Determining Eligibility

In TLCHB, one of the tools that the CoC uses to determine level of housing assistance is the SPDAT. The SPDAT/housing assessment is completed with the person in a housing crisis.

- *The Service Prioritization Decision Assistance Tool (SPDAT)*
Housed within all of participating shelters, as well as most of the Community Mental Health Centers, are Re-Housing Specialists. These specialized case managers are trained in the variations between Housing Programs within the community as well as the SPDAT.

The SPDAT (for individuals) takes into account 15 different domains. The Family SPDAT (F-SPDAT) takes into account 20 domains to determine the family's housing acuity. The SPDAT/F-SPDAT prioritize both housing type as well as housing priority. This tool provides an evidence based assessment of the client's housing preparedness. TLCHB

also considers the amount of time spent in shelter or on the streets within the referral process; this ensures the community minimizes the duration of homelessness.

Re-Housing Specialists utilize other case management expertise, case file documentation, and in depth interviewing techniques to complete the SPDAT or the F-SPDAT.

From the various remote access points for SPDAT re-housing assessments, all community SPDAT numbers and information are given to the TLCHB's Communication & Data Specialist to be compiled into a Community SPDAT list. Referrals to appropriate housing programs are coordinated from this list.

- *Community SPDAT List*

The Community SPDAT List is another tool that is used to determine client eligibility. The TLCHB Communication & Data Specialist is responsible for monitoring and maintaining the Community SPDAT Lists. The entries on the Community SPDAT List represent those individual/families who have obtained their required re-housing documents, completed a SPDAT, and are currently homeless. The entries contain the head of household's HMIS number, the SPDAT score, the date the SPDAT was completed, and the number of weeks on the Community SPDAT List.

The Community SPDAT List is distributed to all shelters, Community Mental Health Center, housing programs, CE staff, and outreach workers who have been SPDAT trained. This allows them to track their clients. When a person is referred to a housing program, the TLCHB Communication & Data Specialist documents the referral on spreadsheet and includes which agency and program the person is referred to. The TLCHB Communication & Data Specialist maintains two spreadsheets; 1) the referral spreadsheet which includes agency and recommend programs; 2) spreadsheet of all SPDAT Lists.

Referral Approach

The TLCHB CoC uses a cohesive referral approach. When a referral is made, an email is sent to all parties involved which allows each agency to see what other case managers and supports the referral may have. Case conferences occur frequently to ensure a warm handoff.

Case conferences should include every agency the referral is receiving services from. Examples may include the referring agency, the receiving agency, Children's Services, TLCHB, Community Mental Health Centers, etc. Utilizing case conferences allows all agencies to identify and discuss the referral's barriers and ultimately serve the person more efficiently.

Housing Program Eligibility & Level of Assistance

Within the TLCHB CoC, there is a range of housing programs available to persons experiencing homelessness. The programs range from offering short-term assistance to long-term assistance. The TLCHB CoC honors the referral's choice regarding a specific agency or program type, whenever possible. The TLCHB Communication & Data Specialist is advised when a referral requests alternate placement or program. Each program has eligibility requirements and provides a different level of assistance. Below are the eligibility requirements for each housing program:

- *Short-Term Rapid Re-Housing:*
 - a. Currently homeless
 - b. Obtained all required re-housing documents
 - c. Completed SPDAT
 - d. SPDAT score between 20-34 for single adults; 35-60 for families
- *Medium-Term Rapid Re-Housing:*
 - a. Currently homeless
 - b. Families only
 - c. Obtained all required re-housing documents
 - d. Completed SPDAT
 - e. SPDAT score in the higher RRH range
 - f. Cannot re-enter medium-term RRH for 9 months after exiting medium RRH
- *Tenant-Based Rental Assistance (TBRA):*
 - a. TBRA is still considered a form of RRH
 - b. Currently homeless
 - c. Obtained all required re-housing documents
 - d. Completed SPDAT

- e. SPDAT score on the higher end of the RRH range
- f. Cannot have been in the TBRA program previously
- *Permanent Supportive Housing (PSH):*
 - a. Currently homeless
 - b. Obtained all required re-housing documents
 - c. Completed SPDAT
 - d. SPDAT score between 35-60 for singles; 54-80 for families
 - e. Have a disability documented on a housing impairment form

Below are the services provided by each type of program:

- *Short-Term Rapid Re-Housing (RRH):*
 - a. Security deposit
 - b. Outstanding utility debt (up to 6 months)
 - c. \$2,400.00 stipend for rent
 - d. Ongoing case management and wrap around services
- *Medium-Term Rapid Re-Housing (RRH):*
 - a. Security Deposit
 - b. Up to 12 months of rental assistance
 - c. Up to 6 months of past utility debt
 - d. Ongoing case management and wrap around services
- *Tenant-Based Rental Assistance (TBRA):*
 - a. Security deposit
 - b. Utility deposits (for gas and electric)
 - c. 12 months of rental assistance
 - d. Utility allowance when housed
 - e. Ongoing case management and wrap around services
- *Permanent Supportive Housing (PSH):*
 - a. Security deposit
 - b. Outstanding utility debt (up to 6 months)
 - c. 12 months or more of rental assistance
 - d. Ongoing case management and wrap around services

Disclosure: The Coordinated Entry Process complies with the non-discrimination requirements of the Fair Housing Act, which prohibits discrimination in all housing transactions on the basis of race, national origin, sex, color, religion, disability status and familial status. This also includes protection from housing discrimination based on source of income. Additional protected classes under state law include sexual orientation (including gender identity), marital status, military

discharge status, age (40+). Agencies cannot preference any protected class unless allowed by statute/regulation, or written waiver from their funding or regulatory body (i.e. U.S. Department of Housing and Urban Development).

All Authorized User Agencies who enter into an MOU for the Coordinated Entry Process agree to take full accountability for complying with Fair Housing and all other funding and program requirements. The MOU requires User Agencies to use the Coordinated Entry Process in a consistent manner with the statutes and regulations that govern their housing programs.

The TLCHB CoC will request from each Authorized User Agency their tenant selection plan and any funding contract that requires or allows a specific subpopulation of persons to be served. For instance, Housing Opportunities for Persons with AIDS (HOPWA) programs will show funding contract, or a single-gender program must produce its HUD waiver. The TLCHB CoC in accordance with the Fair Housing Act also recognizes that a housing provider may seek to fulfill its “business necessity” by narrowing focus on a subpopulation within the homeless population. The Coordinated Entry Process may allow filtered searches for subpopulations while preventing discrimination against protected classes.

Participating Project List

It is critical to determine housing program availability before making a referral. TLCHB’s Communication & Data Specialist is responsible for monitoring housing program availability.

The TLCHB Communication & Data Specialist communicates weekly with the multiple housing programs to inquire about availability.

After the housing programs have communicated the availability for the week, the TLCHB Communications & Data Specialist enters that information into a spreadsheet. This spreadsheet includes the number of openings each week, the program type (RRH, TBRA or PSH) and the individual projects and any additional eligibility requirements.

A separate spreadsheet is created that has all of the Community SPDAT Lists that have been distributed complete with referral information.

Referral Communication & Monitoring

Referral Communication

After eligibility has been determined the TLCHB Communication & Data Specialist verifies that the person has all necessary documents and the SPDAT score. Then, when an opening has been identified, the TLCHB Communication & Data Specialist informs all parties involved of the referral. This is done via email as all parties can keep electronic records.

The referral email contains the following information:

- The referral date and time
- The person (identified by an HMIS number for confidentiality)
- The program type the person is being referred for
- Any relevant information or disabilities (family size, wheel chair access, etc.)
- A timeframe for the referral agency to contact the person
- How to locate the person's required documents and SPDAT

The referral email is sent from the TLCHB Communication & Data Specialist to the following parties:

- The agency currently serving the person (shelter and/or mental health provider)
- The agency receiving the referral
- The Coordinated Entry Specialist

When the referral agency receives the referral, they are given access to the client's documents and SPDAT score to verify eligibility.

Referral Monitoring

The TLCHB CoC has the ability to monitor referral progress. The TLCHB Communication & Data Specialist using electronic documentation and the HMIS data system monitors the referrals.

When a referral is made, the TLCHB Communication & Data Specialist sends an email notifying all parties of the referral. In that email there is a timeframe by which the receiving agency must contact the client, generally it is a 7-10 day timeframe. After the receiving agency completes an intake with the person, an entry is made in the HMIS data system. Additionally, there is an option in HMIS for the referral agency and the receiving agency to leave case notes documenting progress.

After 10 days the TLCHB Communication & Data Specialist will verify that the person's documents were shared correctly and check for an entry in HMIS. If the documents have been shared and there has been confirmation that the person has not been contacted the TLCHB Communication & Data Specialist will contact the receiving agency to inquire about the status of the referral. If the receiving agency is unable to take the referral, an alternative referral is identified. If the receiving agency is unable to locate a person after 7-10 days the case will be closed. The person will have the opportunity for another referral if they present as homeless again in the future.

Referral Rejection Protocol

Receiving Agency

In the TLCHB CoC, receiving agencies are permitted to reject a referral if the referral violates the agency's program policies. If a referral is rejected the person, the agency serving the person and the TLCHB Communication & Data Specialist is notified in writing of the rejection and the rationale. A rejection letter also contains that agency's grievance procedure. The person has the right to file a grievance and go through the grievance procedure within that agency. If the person wishes to escalate the grievance it is brought to either TLCHB's Executive Director or Grants Administrator.

If a solution cannot be reached and the person is still in need of housing assistance, the TLCHB Communication & Data Specialist makes every effort to identify an alternate referral agency.

Client

As mentioned previously, the TLCHB CoC does adhere to a person's choice when it comes to referrals. At the beginning of the process, the person is made aware of what program types are available for them and the eligibility requirements associated with each one. If the person has a preference for program type or agency and the person is eligible for that program or agency, the TLCHB CoC does honor that. If the person has a preference, they are informed that by limiting their referral options they may be prolonging the referral process, however if the person still has a certain preference, the TLCHB CoC honors it.

Referral Process for DV Victims

The TLCHB CoC has a process for serving a person that is fleeing from domestic violence. There are two options, one is used if the client is willing to have their

information entered into the secure HMIS data system, and the other is used if the client refuses to have their information entered into the secure HMIS data system.

Allow Information in HMIS

If a person consent to be entered into the HMIS system, they are given a consent form that they must sign. Then, the process proceeds as it usually does; a SPDAT is completed, the person is placed on the Community SPDAT List, a referral is made and agencies work together to assist the person obtaining housing.

Refuse Information in HMIS

No person is required to be entered into HMIS. If a person does consent to being entered into the HMIS system, they can be entered anonymously without providing any identifying information. In this case, either the DV shelter or the TLCHB Communication & Data Specialist will give the person an ID number, not an HMIS number. The person will have the SPDAT completed and be placed on the Community SPDAT List, using the client ID number.

When a referral is made, the TLCHB Communication & Data Specialist or the agency serving the person will fax the person's documents and SPDAT to the agency receiving the referral. This will only be communicated via fax for security. The person will be identified by the client ID number in any electronic correspondence.

If a case manager enters, a person anonymously in HMIS that case manager is responsible for tracking that person in the system.

If a person has had their information entered into HMIS and then chooses to be anonymous in that system, the HMIS Administrator is contacted to allow that person to be anonymous.

Housing Referrals for DV Victims

The agency receiving the referral is informed if the person is a DV victim or residing in a DV shelter. This allows the receiving agency to prepare a housing plan specific to that person.

Referral Process for Veterans

In order to identify all veterans in the Toledo Lucas County Continuum of Care, the Community Veterans Committee Master List Sub-group will use various sources of relevant data to compile and maintain a Master (by name) list. The following sources of relevant veterans' data have been identified. Sources shall be polled no less than every two weeks:

1. Toledo HMIS (Toledo Lucas County Homelessness Board), including data from Open Door Ministries, NPI Veterans Program (GPD), Beach House, St Pauls' Community Center Shelter & Family House Shelter
2. WSOS Community Action, including data from Outreach Sources i.e., Cherry Street Mission Ministries and Toledo Gospel, & National Church Residences (via ineligible referrals)
3. Veterans Affairs of Ann Arbor, including data from VA referrals to ADAMS House, VASH referrals and all outreach activities.
4. Verification of Permanent Housing Offer forms should be polled.

The Toledo Lucas County Homelessness Board's HMIS administrator will be responsible to maintain the Veterans' Master List. The HMIS Administrator will poll the sources of veteran data no less than every two week and update the Master List accordingly. Once updated the Master List will be securely distributed to members of the Master List Subgroup for the bi-weekly case conferencing meeting.

Not less than every two weeks, all veterans on the Master List will be discussed in the Master List Sub-group with the goal to identify barriers to permanent housing and facilitate solutions to those barriers. The HMIS administrator will lead the Sub-group through the Master list. All parties with relevant data will share updates to the veteran's status. The sub-group will identify next steps to the goal of the veteran's obtaining permanent housing and assign the next steps to a Sub-group member. The HMIS administrator will note all updates, next steps and responsible parties in the Master list.

The Master List Sub-group will report out aggregate statistics and benchmarks regularly. The HMIS Administrator will process the statistics and benchmarks no less than once monthly and report them to the Community Veterans Committee Planning Group. And the Master List Policies and Procedures will be reviewed no less than annually based on case conferencing performance.

Referral Process for Unaccompanied Youth

Currently, there are two processes for serving unaccompanied youth, the determinant being the age of the youth. For those youth between the ages of 18 to 24 years old, these youth are entered into the coordinated entry referral process described on pages 1 to 9. For unaccompanied youth under 18 years old, the youth are referred to Safety Net, a youth shelter for youth from 12 to 17 years old.

Safety Net provides temporary shelter, supportive services and life skills development lessons to youth who have left home without permission of their parents or guardians or to other homeless youth who might otherwise end up in the child welfare, mental health, or juvenile justice systems in Lucas County (Toledo), Ohio. Safety Net is designed to increase youth's safety, social and emotional well-being, self-sufficiency, and to help them build permanent connections with families, communities, schools and other positive social networks.

Youth ages 12-17 may stay (become a resident at Safety Net) if they meet one or more of the following criteria:

1. Youth are experiencing a family crisis to the point where safety, physical health or emotional health is at risk;
2. Youth who have run away;
3. Youth who have been asked to leave their residence;
4. Youth who are homeless or couch hopping from place to place;
5. Youth who are stranded in the area;
6. Youth who are being physically, sexual, or emotionally abuse and need to get help; or
7. Other situations that are a crisis for the resident (i.e. resident is lost, resident's guardians cannot be located, etc.).

Custodial consent is required for minor residents who remain in the Shelter for more than twenty-four hours. Staff will attempt to obtain consent at admission or as soon as possible unless there are reasons to delay contact with guardian.

Referrals may come from a variety of sources. Youth may just appear at Safety Net and will be assessed.

While at Safety Net, the youth will be provided with:

- **Gateway services**, providing food, shelter, clothing, transportation and hygiene-related items;

- **Assessment services and intensive coordinated case management**, ensuring youth receive assistance with emotional and behavioral health challenges while developing a plan for permanency;
- **Continuum service linkages**, ensuring the ability to provide services as a community to the target population; and
- **Follow-up/aftercare services**, providing three months of follow-up services to youth, including a plan to exit, permanent placement and personal goals.

Youth will be screened within their first two days in the shelter by staff; the results of these screens will be used to inform the service planning process, including the need for further assessment. Clinical assessment for behavioral health will be provided by staff within Zepf Center's youth services department.

Shelter staff will collaborate with the youth to develop an exit plan. Part of the exit planning process will be to ask the youth to discuss their plans for either reunification with the parents/ guardian or to consider options for a safe and stable living situation if reunification is not possible. 90 days of follow up/aftercare services will be provided for youth who receive shelter services or are provided alternative living arrangements, regardless of their length of stay in the shelter.

Toledo Lucas County Continuum of Care: Recommendations for Collaborative Governance of Coordinated Assessment

Original Document Prepared by

Terry Biel—Technology Director, Toledo Lucas County Homelessness Board
Mike Badik—Grants Administrator, Toledo Lucas County Homelessness Board

Revisions Prepared by:

Richard Sutherland—HMIS Administrator, Toledo Lucas County Homelessness Board

Background

This document is intended as an addendum to the original Coordinated Assessment recommendations developed through the Housing Collaborative Network and subsequently adopted by the Toledo Lucas County Homelessness Board (TLCHB). The original recommendations left unaddressed the structure by which providers can provide feedback on the quality of referrals from Coordinated Entry, address logistics concerns, and establish standards for participating program types. These are addressed now in this document.

In January 2017, The Department of Housing and Urban Development (HUD) released the **Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System (Notice CPD-17-01)** and the **Coordinated Entry Process Self-Assessment**. Together, these two documents present updated requirements and a method of assessment to evaluate the current functioning of Coordinated Assessment (Coordinated Entry) projects. After reviewing the documents, the Quality and Performance Committee tasked themselves with reviewing and revising the local documents and processes.

Terminology: Coordinated Assessment to Coordinated Entry

While Coordinated Assessment is the terminology used in the statutes, HUD and the other Federal Partners have agreed on another phrase to describe the process: Coordinated Entry. While the terms may be used interchangeably, HUD and the Federal partners will use Coordinated Entry to refer to the projects. TLCHB will align with this change.

Management of Coordinated Entry

The Toledo Lucas County Homelessness Board and its staff are ultimately responsible for the implementation and management of Coordinated Entry for housing crises and homeless services in the Toledo Lucas County Continuum of Care.

Data Management for Coordinated Entry

Coordinated Entry includes significant data and therefore, data management. The Toledo Lucas County Continuum of Care has implemented a Homeless Management Information System (HMIS) to help manage data for persons who are homeless within the continuum. As such, data management for all Coordinated Entry functions will be managed within HMIS, to the extent effective within the HMIS software. Important Coordinated Entry data management functions include: Records of Initial Contact and Assessment; Referrals to Emergency Shelter, Transitional Housing or Safe Haven; Records of Stays in Emergency Shelter, Transitional Housing and Safe Haven; Assessments for Housing Placement; and Referrals to Permanent Housing Options (Rapid ReHousing, Permanent Supportive Housing, or other Permanent Housing services).

Privacy Protections for Coordinated Entry

As an extension of the HMIS, data collected for Coordinated Entry functions will be subject to the Privacy and Security provisions of the **Toledo Homeless Management Information System (HMIS) Consolidated Policies and Procedures**, including annual privacy and security training of all HMIS End users. While all homeless service clients must be entered in HMIS, clients that do not consent to share their Personally Identifiable Information (PII) may be entered anonymously.

Evaluation of Coordinated Entry

In order to maintain an effective and functioning system, the community will periodically evaluate the performance of the Coordinated Entry.

Client Surveys

Client Surveys will be used to evaluate the effectiveness of proximate Coordinated Entry experiences. Surveys will be conducted twice a year and at entry or exit of projects adjacent to the Coordinated Entry Functions, such as 1) at Emergency Shelter/Transitional Housing/Safe Haven Start to evaluate initial contact and assessment and referrals or 2) Emergency Shelter/Transitional Housing/Safe Haven Exit to evaluate assessments of permanent housing placement, or 3) at three (3) months after Permanent Housing Placement to evaluate the assessment of permanent housing placement.

Client Focus Groups

Client Focus Groups will be convened to evaluate the effectiveness of the immediate and ongoing Coordinated Entry experiences. Focus groups will be convened twice a year during project client stays and for all effected project types (e.g., Emergency Shelters and Permanent Supportive Housing).

Service Provider Reports

Service Providers and projects can, at any time, report feedback about Coordinated Entry processes to TLCHB using a Coordinated Entry Report Form.

Service Provider Focus Group

Annually, one Housing Collaborative Network (HCN) meeting will be designated for obtaining feedback from participating organizations/projects regarding the effectiveness of Coordinated Entry.

Feedback Evaluation and Reporting

Feedback from all data collection formats will be given to the TLCHB Quality and Performance Committee (or sub-committee thereof) for evaluation. The Committee will report annually on the functioning and effectiveness of the Coordinated Entry project to the community.

Client Privacy for Feedback

At a minimum, clients will have the opportunity to provide feedback anonymously through both surveys and focus groups, although TLCHB reserves the right to mandate anonymity for all collected client feedback. All client feedback passed to the Quality and Performance Committee (or sub-committee thereof) for the purpose of evaluation will be anonymous.

Quality of Care Workgroups

The Quality of Care groups, as created by previous policies, are discontinued.

Coordinated Assessment Advisory Committee

The Coordinated Assessment Advisory Committee, as created by previous policies, is discontinued.

Document History

Document Prepared by

Terry Biel—Technology Director, Toledo Lucas County Homelessness Board

Mike Badik—Grants Administrator, Toledo Lucas County Homelessness Board

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Revisions prepared by
Richard Sutherland – HMIS Administrator, Toledo Lucas County Homelessness Board

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Toledo Lucas County Continuum of Care: Recommendations for Centralized Approach to Coordinated Access/Entry

Prepared by:

Original: Terry Biel – Technology Director, Toledo Lucas County Homelessness Board
Revisions: Mike Badik – Executive Director, Toledo Lucas County Homelessness Board

What is a Centralized Approach to Coordinated Access/Entry (Centralized CE Approach)

Under a Centralized CE Approach, households may enter the system in a variety of ways. However, these all ultimately involve connecting households to a single, centralized point to receive the bulk of Screening, Diversion, and Temporary Placement services. In our community, a Centralized CE Approach is the “best fit” for Centralized CE with United Way 2-1-1 center serving as the single, centralized point for access/entry.

Emergency Shelter

Under this model, Emergency Shelters should not simply turn away walk-ins. If walk-ins present, Emergency Shelter staff should provide initial Screening to try to find a brief resolution to the household’s housing crisis. If this initial Screening does not result in a resolution to their housing crisis and the client is not in need of acute crisis services, the shelter assist the presenter to contact 2-1-1.

Phone calls to shelters for request for placement in their emergency shelter should be redirected to 2-1-1 once it has been established that they are not in need of acute crisis services.

Conversely, households determined to be in-need of emergency shelter by Coordinated Access/Entry will be referred to participating shelters. In the case of shelters using ServicePoint, Centralized CE Approach will check for capacity the emergency shelter before making a referral, and confirm availability as needed. The details of this handoff process must be arranged between Centralized CE Approach and the participating shelters collaboratively.

Diversion and Homelessness Prevention

Rapid Re-Housing, Permanent Supportive Housing and Homeless Prevention providers should direct all walk-ins and other inquiries to 2-1-1.

Households determined to be in-need of and eligible for Temporary Placement services will be referred to participating providers by Centralized CE Approach. The details of this handoff process must be arranged between Centralized CE Approach and the participating shelters collaboratively.

The centralized system will make use of a combination of United Way 2-1-1 Community Resource Navigator Specialist staff (CRNS) and two Coordinated Entry (CE) specialists. CRNS should be trained to provide the centralized Screening and to administer the modified VI-SPDAT. Once a client with a housing instability has cleared the initial Screening for safety concerns, the call should be elevated to CE specialists for Diversion and Homelessness Prevention components. These same CE specialists should provide the assessment for Diversion and Homelessness Prevention services.

Temporary Shelter

If the CE specialists are unable to divert or prevent homelessness, the CE specialists will review the modified VI-SPDAT results, the bed availability at the appropriate shelter(s), any wait list and temporary shelter criteria before authorizing a temporary shelter placement or waiting list referral. In filling an empty bed(s), the CE specialists will identify the person or family being highest on the priority at the time of the bed opening using the order of priority. When contacting the next highest prioritized person or family, the CE specialists will contact that person or head of household and offer available options. If a person or family does not choose to take advantage of any offer, the CE specialists will document the decline in HMIS. The person or family will not be sanctioned for future offers.

With an accepted offer, the TLCHB will contact the temporary shelter agency or entity and present that agency or entity with the referral. If, for any reason, a provider should determine that a referred case is ineligible or inappropriate for their programs, Centralized CE Approach and that provider must work jointly to make a more appropriate referral. The CE specialists will also provide HMIS access for the referred agency

Transportation assistance may be required in some cases, and should be budgeted appropriately.

Assessment

If a person or family has been placed in a temporary shelter, the shelter staff will perform an intake with the adult(s) in the households, noting appropriate information for entry into HMIS and review the status of required re-housing documents. SPDATs will only be conducted after the person or family has all of the appropriate re-housing documents. If there are missing re-housing documents and the person or family does not have the means to pay for some or all of the document(s), the shelter staff can assist the person or family to fill out the re-housing document applications and submit. Further, shelter staff will work with any person or family who has a member who has

been identified as having a diagnosed mental illness to secure a completed and executed Housing Impairment Form. The shelter staff will forward the form to the appropriate agency staff who will upload the copy into HMIS.

For those in hotel/motel or who choose to remain unsheltered and do not identify a mental illness at coordinated entry, the CE specialists will initiate contact with Community Health Worker (CHW). The CHW will assist the person or family to complete and submit the request for the re-housing document voucher application to the TLCHB Grants Administrator (GA) and link them to needed services. Further CHW will work with any person or family who has a member who has been identified as having a diagnosed mental illness to secure a completed and executed Housing Impairment Form. The CHW will forward the form to the appropriate agency staff who will upload the copy into HMIS.

For those in hotel/motel or who choose to remain unsheltered and do identify a mental illness at coordinated entry, the CE specialists will initiate contact with PATH. PATH will assist the person or family to complete and submit the request for the re-housing document voucher application to the TLCHB Grants Administrator (GA) and link them to needed services. Further, PATH will work with any person or family who has a member who has been identified as having a diagnosed mental illness to secure a completed and executed Housing Impairment Form. PATH will forward the form to the appropriate agency staff who will upload the copy into HMIS.

Upon approval of the voucher, the TLCHB GA will send the approved re-housing voucher(s) back to the requesting case manager, CHW or PATH staff member. For state IDs, the case manager will provide the voucher to the person or client for presentation at the Bureau of Motor Vehicles (BMV) to secure the state ID; the BMV will bill TLCHB directly for payment. For birth certificates, the case manager will secure a check(s) from his/her employer in an amount to pay for all needed household birth certificates and present them to the appropriate governmental body, either in person, electronically or through the mail. Upon receipt of birth certificates and Housing Impairment forms, the appropriate agency staff will scan and upload the scanned copies into HMIS.

After a person or family who has all of their re-housing documents for all household members and Housing Impairment form(s) if needed, a trained and approved CoC partner staff member will perform the assessment (SPDAT or F-SPDAT) preferably on-site. The shelter staff, the CHW or the PATH worker will schedule the SPDAT or F-SPDAT between the person or head of household and the trained and approved CoC partner staff member. The staff member performing the SPDAT or F-SPDAT will either upload the SPDAT or F-SPDAT in HMIS or have the appropriate agency staff upload the assessment into HMIS. Then either staff member performing the SPDAT or F-SPDAT or the shelter case manager, the CHW or PATH Worker will notify the TLCHB Communications & Data Specialist (CDS) that the SPDAT/F-SPDAT, the re-housing

documents and, if required, the Housing Impairment form has been uploaded into HMIS.

Permanent Housing Placement

Weekly, the TLCHB CDS will update the community SPDAT list. Once updated, the TLCHB Communications & Data Specialist will review the SPDAT scores, the order of priorities and any open permanent housing provider units and then make referrals for the highest ranked person or families into any open units. The TLCHB CDS will match the highest ranked person or family with any permanent housing openings for which they may qualify. If there is no available unit (including meeting the program criteria) for the highest ranked person or family, the TLCHB (CDS will move to next highest ranked individual who does qualify for the open unit. If a person or family is skipped for placement due to either refusal of the placement or unavailability of a unit for which the person or family meets program qualifications, that person or family will be continued on the list.

The permanent housing placements are generally made primarily upon their SPDAT score and availability of permanent housing for which they qualify. For those scoring less than 20 on the SPDAT and those scoring less than 27 on the F-SPDAT, no permanent housing options will be offered; those persons or families will be referred to the appropriate supportive services and are expected to self-resolve their homelessness. Those persons or families scoring between 20 and 27 on the SPDAT or between 27 and 40 on the F-SPDAT are eligible for Rapid Re-Housing financial assistance and services. Those scoring between 28 and 34 on the SPDAT or between 41 and 53 and do not have the ability to increase their earned income will be eligible for short or medium term rapid re-housing financial assistance and services, with a maximum of \$2,400 of rental assistance unless making progress on their housing stability plan. Those scoring between 28 and 34 on the SPDAT or between 41 and 53 and do have the ability to increase their earned income will be eligible for TBRA, renewable quarterly based upon being recertified as program eligible and progressing on their housing stability plan.

If the person or family has a disability as documented on a Housing Impairment form or has SSI or SSDI and scores less than 35 on the SPDAT or less than 54 on the F-SPDAT may be eligible for rapid re-housing, TBRA, or Housing Choice Vouchers (HCV) depending on a meeting of eligibility qualifications. If the person or family with the above SPDAT or F-SPDAT score has ongoing case management and meets LMHA's HCV client eligibility, the person or family is eligible for HCV voucher. If the person or family with the above SPDAT or F-SPDAT score, does not have ongoing case management services and/or does not meet HCV LMHA's HCV client eligibility but has the ability to increase their earned income, the person or family is eligible for TBRA financial services. If the person or family with the above SPDAT or F-SPDAT score, does not have ongoing case management services, does not have the ability to increase earned income, and/or does not meet HCV LMHA's HCV client eligibility, the person or family is

eligible for rapid re-housing financial assistance and services; but if this qualifying person or family with a disability fails in RRH program, they would be eligible for PSH.

If a person or family scores 35 or greater on the SPDAT or 54 or greater on the F-SPDAT, this person or family is eligible for PSH. But they are also eligible for rapid re-housing financial assistance or services and TBRA or HCV if they meet those two programs eligibility if they do not want to wait for PSH opening without penalty. Failing in any of those programs, the person or family will be re-assess and again eligible for PSH financial assistance and services.

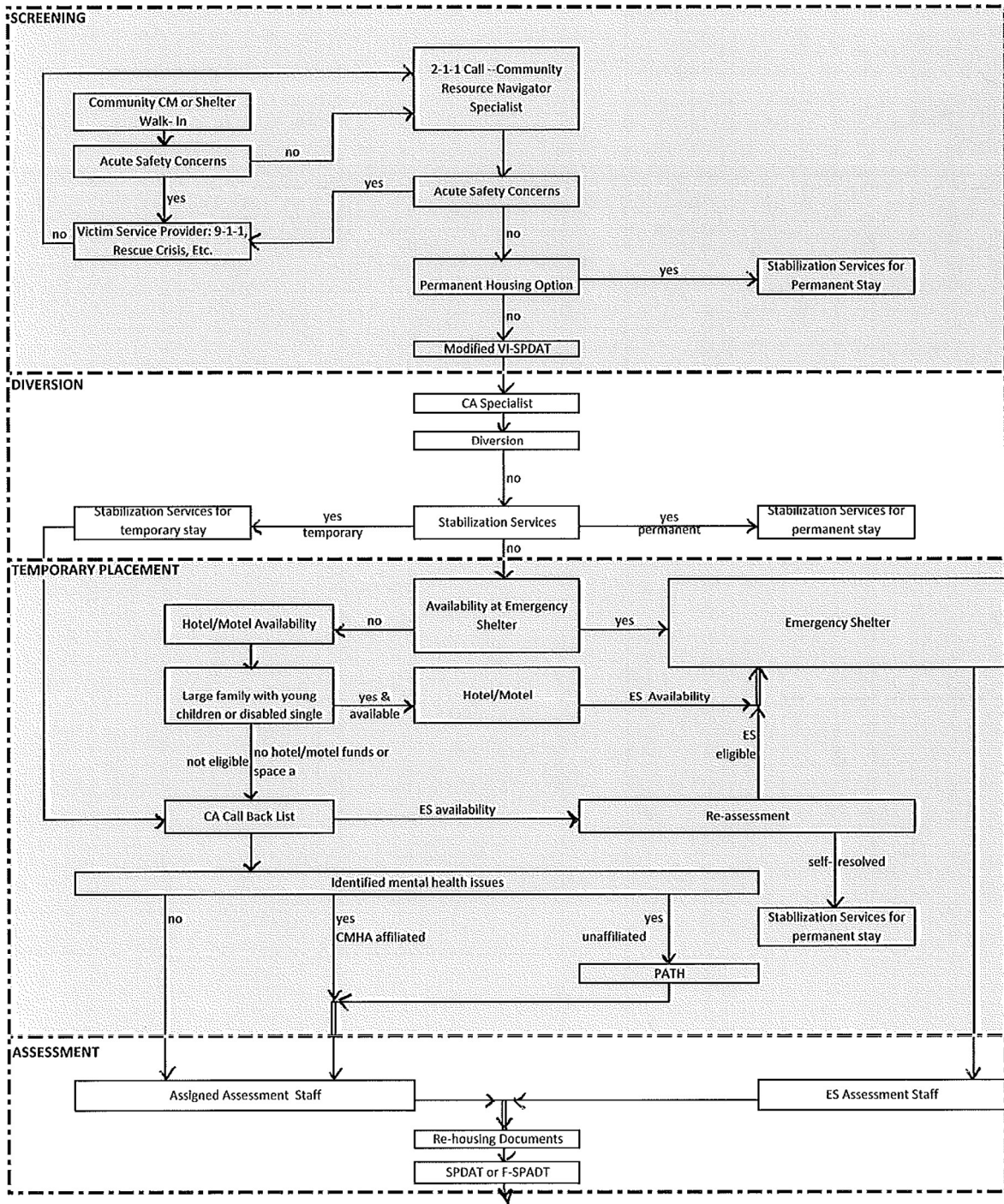
Mutual Responsibility for Appropriate Referrals

Whether through the Housing Collaborative Network or another body, participating providers must have the opportunity and responsibility to influence the design of Centralized CE Approach and provide feedback on the cases being referred to them. If, for any reason, a provider should determine that a referred case is ineligible or inappropriate for their programs, CE specialists and that provider must work jointly to make a more appropriate referral.

Putting it All Together

The following chart is intended to help visualize the interaction of the pieces in this system and the movement of households through the stages of Screening, Diversion, and Temporary Placement. The shaded areas marked as Screening, Diversion, and Temporary Placement would all take place through United Way 2-1-1. The securing of re-housing documents and, if required, Housing Impairment form is the responsibility of the person or family assisted by the assigned shelter case manager, the CHW or PATH worker who ensures that they are uploaded into HMIS and notify the appropriate CoC partner staff trained in conducting the assessment. Once the assessment is completed and uploaded, the responsible shelter case manager, the CHW or PATH worker notifies the TLCHB Communications and Data Specialist of that upload. The TLCHB Communications and Data Specialist then updates the Community SPDAT lists and makes referrals of the most severest ranked person or family based upon the TLCHB order of priorities and who meets any of the program criteria of an available housing unit to the appropriate Permanent Housing Provider.

REVISED FLOWCHART FOR COORDINATED ASSESSMENT



**SF-424s
and
CERTIFICATIONS**

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
---	---	--

* 3. Date Received: <input type="text" value="06/16/2026"/>	4. Applicant Identifier: <input type="text"/>
---	---

5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>
---	--

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
--	--

8. APPLICANT INFORMATION:

* a. Legal Name: <input type="text" value="City of Toledo, Dept. of Housing and Community Development"/>

* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="34-6401447"/>	* c. UEI: <input type="text" value="N669DP1XJCH6"/>
---	---

d. Address:

* Street1:	<input type="text" value="One Government Center, Suite 1800"/>
Street2:	<input type="text"/>
* City:	<input type="text" value="Toledo"/>
County/Parish:	<input type="text"/>
* State:	<input type="text" value="OH: Ohio"/>
Province:	<input type="text"/>
* Country:	<input type="text" value="USA: UNITED STATES"/>
* Zip / Postal Code:	<input type="text" value="43604-2275"/>

e. Organizational Unit:

Department Name: <input type="text" value="Hsg. & Community Development"/>	Division Name: <input type="text"/>
--	---

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Rosalyn"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Clemens"/>	
Suffix: <input type="text"/>	

Title: <input type="text" value="Dir., Dept. of Hsg. & Community Development"/>
--

Organizational Affiliation: <input type="text"/>
--

* Telephone Number: <input type="text" value="(419) 245-1400"/>	Fax Number: <input type="text" value="(419) 245-1192"/>
--	--

* Email: <input type="text" value="rosalyn.clemens@toledo.oh.gov"/>
--

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

US Department of Housing and Urban Development

11. Assistance Listing Number:

14.218

Assistance Listing Title:

Community Development Block Grants/Entitlement Grants

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

52nd Yr. CDBG - Programmatic & operational plan for improving the physical, economic/social conditions, & quality of life for citizens through community dev., economic dev., & hsg. activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="7,026,026.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="900.00"/>
* g. TOTAL	<input type="text" value="7,026,926.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on .
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

- Yes
- No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

**Applicant and Recipient
Assurances and Certifications**

U.S. Department of Housing
and Urban Development

OMB Number: 2501-0044
Expiration Date: 02/28/2027

Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant:

*Authorized Representative Name:

Prefix: Mr. *First Name: Wade
Middle Name:
*Last Name: Kapszukiewicz
Suffix:

*Title: Mayor, City of Toledo

*Applicant Organization: City of Toledo, Dept. of Housing and Community Development

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which

is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

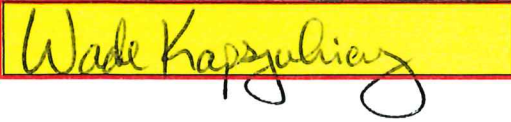
8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.


I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

*Signature:

x 

*Date:

x 

Application for Federal Assistance SF-424								
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application			* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision			* If Revision, select appropriate letter(s): _____ * Other (Specify): _____		
* 3. Date Received: 06/16/2026			4. Applicant Identifier: _____					
5a. Federal Entity Identifier: _____			5b. Federal Award Identifier: _____					
State Use Only:								
6. Date Received by State: _____			7. State Application Identifier: _____					
8. APPLICANT INFORMATION:								
* a. Legal Name: City of Toledo, Dept. of Housing and Community Development								
* b. Employer/Taxpayer Identification Number (EIN/TIN): 34-6401447				* c. UEI: N669DP1XJCH6				
d. Address:								
* Street1: One Government Center, Suite 1800			Street2: _____					
* City: Toledo			County/Parish: _____					
* State: OH: Ohio			Province: _____					
* Country: USA: UNITED STATES			Zip / Postal Code: 43604-2275					
e. Organizational Unit:								
Department Name: Hsg. & Community Development				Division Name: _____				
f. Name and contact information of person to be contacted on matters involving this application:								
Prefix: Ms.		* First Name: Rosalyn						
Middle Name: _____								
* Last Name: Clemens								
Suffix: _____								
Title: Dir., Dept. of Hsg. & Community Development								
Organizational Affiliation: _____								
* Telephone Number: (419) 245-1400			Fax Number: (419) 245-1192					
* Email: rosalyn.clemens@toledo.oh.gov								

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

US Department of Housing and Urban Development

11. Assistance Listing Number:

14.231

Assistance Listing Title:

Emergency Solutions Grant Program

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

40th Yr. ESG - Provision of homelessness prevention, rapid re-housing, and housing stabilization activities to eliminate homelessness.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="619,354.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="619,354.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

- Yes
- No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

**Applicant and Recipient
Assurances and Certifications**

U.S. Department of Housing
and Urban Development

OMB Number: 2501-0044
Expiration Date: 02/28/2027

Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant:

*Authorized Representative Name:

Prefix: *First Name:
Middle Name:
*Last Name:
Suffix:

*Title:

*Applicant Organization:

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et.seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which

is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et.seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

*Signature:

x Wade Kapszuliewicz

*Date:

x 5-19-26

Application for Federal Assistance SF-424

* 1. Type of Submission:

- Preapplication
 Application
 Changed/Corrected Application

* 2. Type of Application:

- New
 Continuation
 Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

06/16/2026

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Toledo, Dept. of Housing and Community Development

* b. Employer/Taxpayer Identification Number (EIN/TIN):

34-6401447

* c. UEI:

N669DP1XJCH6

d. Address:

* Street1:

One Government Center, Suite 1800

Street2:

* City:

Toledo

County/Parish:

* State:

OH: Ohio

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

43604-2275

e. Organizational Unit:

Department Name:

Hsg. & Community Development

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

* First Name:

Rosalyn

Middle Name:

* Last Name:

Clemens

Suffix:

Title: Dir., Dept. of Hsg. & Community Development

Organizational Affiliation:

* Telephone Number:

(419) 245-1400

Fax Number:

(419) 245-1192

* Email:

rosalyn.clemens@toledo.oh.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

US Department of Housing and Urban Development

11. Assistance Listing Number:

14.239

Assistance Listing Title:

HOME Investment Partnerships Program

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

35th Yr. HOME - Housing Rehabilitation Program: Owner-Occupied Rehabilitation, Down Payment Assistance, Housing Development, CHDO Set-Aside, and Tenant-Based Rental Assistance.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,971,147.86"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="559,876.30"/>
* g. TOTAL	<input type="text" value="2,531,024.16"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

- Yes
- No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

**Applicant and Recipient
Assurances and Certifications**

U.S. Department of Housing
and Urban Development

OMB Number: 2501-0044
Expiration Date: 02/28/2027

Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant:

*Authorized Representative Name:

Prefix:	Mr.	*First Name:	Wade
Middle Name:			
*Last Name:	Kapszukiewicz		
Suffix:			

*Title: Mayor, City of Toledo

*Applicant Organization: City of Toledo, Dept. of Housing and Community Development

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et.seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which

is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

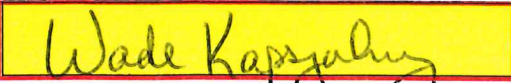
8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et.seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

*Signature:

x 
180

*Date:

x 

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

x Wade Kopyulchey
Signature of Authorized Official

x 5-19-20
Date

x Mayer
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) July 1, 2026 – June 30, 2027 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

x Wade Kappuly
Signature of Authorized Official

x 5-19-26
Date

x Mayor
Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

x Wade Kopyulsky
Signature of Authorized Official

x 5-19-26
Date

x Mayor
Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

x Wade Kapsulny
Signature of Authorized Official

x 5-19-26
Date

x Mayor
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.