

# **SUBSTANTIAL AMENDMENT**

**to the City of Toledo, OH  
HOME-ARP ALLOCATION PLAN**

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**January 2026**

**PART I**  
**HOME-ARP SUBSTANTIAL AMENDMENT**

## **HOME-ARP ALLOCATION PLAN AMENDMENT DESCRIPTIONS**

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### **Introduction**

In accordance with *Section IV. Qualifying Population, Targeting and Preferences* of [Notice CPD 21-10](#), “a Participating Jurisdiction (PJ) may establish reasonable preferences among the Qualifying Populations (QPs) to prioritize applicants for HOME-ARP projects or activities based on the PJ’s needs and priorities, as described in its HOME-ARP Allocation Plan.” Eligible QPs include the following:

- QP 1: Homeless, as defined in 24 CFR 91.5 Homeless (1), (2), or (3).
- QP2: At risk of Homelessness, as defined in 24 CFR 91.5 At risk of homelessness.
- QP3: Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD.
- QP4: Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability.

For the full definitions of each QP, see [Notice CPD 21-10](#).

The narrative below describes the addition of a preference for [Qualifying Population 1 \(QP1\)](#) “individuals and households experiencing homelessness, as defined at [24 CFR 91.5](#) Homeless (1), (2), and (3)” for HOME-ARP Supportive Services projects. The amendment reflects continued alignment among the needs assessment, data analysis, professional consultation, and public participation processes originally outlined in the City of Toledo’s [HOME-ARP Allocation Plan](#), submitted in December 2022 and approved by the HUD Field Office in 2023.

This amendment establishes a preference for supportive services programs funded through the City’s HOME-ARP allocation and does not introduce any significant changes to preferences for other HOME-ARP project or activity types.

The City’s [HOME-ARP Allocation Plan](#) is grounded in two core strategies to address critical gaps in Toledo’s homelessness response system: expanding access to affordable rental housing for HOME-ARP Qualifying Populations and supporting the delivery of essential supportive services. To further advance these strategies and better respond to the needs of HOME-ARP Qualifying Populations, the City has determined that a Substantial Amendment is necessary to establish a preference for individuals and households experiencing homelessness (QP1) within its HOME-ARP Supportive Services projects.

### **Rational for Proposed Change in the City’s HOME-ARP Allocation Plan**

#### ***Individuals Experiencing Homelessness***

As originally submitted, data from the [2022 Housing Inventory Count](#) (HIC) indicates that the Toledo/Lucas County Continuum of Care (CoC) had 459 year-round emergency shelter beds and a total of 813 permanent supportive and rapid rehousing units available to serve individuals experiencing homelessness.

At the time the City drafted its original of the HOME-ARP Allocation Plan, the [2022 PIT count](#) identified 494 individuals were experiencing homelessness. More recent data demonstrates a notable

increase in homelessness within the CoC. The [2024 PIT count](#) identified 563 individuals experiencing homelessness, representing a 13.97 percent increase over the 2022 count. While the number of unsheltered individuals declined during this period, the sheltered population increased substantially, suggesting sustained pressure on the emergency shelter system.

Category	2022 PIT Count	2024 PIT Count	Percent Change
Sheltered	448	551	22.91%
Unsheltered	46	12	-73.91%
<b>Total</b>	<b>494</b>	<b>563</b>	<b>13.97%</b>

**Table 1** [2022 PIT Count](#) and [2024 PIT Count](#) Comparison

Additional system-level data further underscores these trends. According to the [System Performance Report](#) submitted with the 2024 CoC NOFO, 2,180 people experienced homelessness for the first time during the reporting period, and households spent an average of 446 bed nights homeless. Extended lengths of stay in emergency shelter are widely recognized as an indicator of constrained exits to affordable permanent housing. Local stakeholders report that shelters within the Toledo/Lucas County CoC have been operating at or near capacity for several months and continue to maintain lengthy waitlists for both individuals and families. Collectively, these conditions point to the need for targeted supportive services that prioritize households currently experiencing homelessness.

In response to these documented needs, the City of Toledo will establish a preference for Qualifying Population 1 ([QP1](#)) for its HOME-ARP Supportive Services project(s). In accordance with [Notice CPD 21-10](#) and the [HOME-ARP: Preferences, Methods of Prioritization, and Limitations](#) quick guide, households qualifying for this preference will be served in chronological order of referral. Households in all other HOME-ARP Qualifying Populations will also be served in chronological order, following QP1 households.

The City affirms that this preference is consistent with the HOME-ARP [Notice CPD 21-10](#) requirements and complies with all applicable fair housing and civil rights laws, including the [Fair Housing Act, Title VI of the Civil Rights Act of 1964](#), and the [Americans with Disabilities Act](#). The preference is tailored to address documented and service gaps, is supported by objective data, and does not exclude or otherwise discriminate against households in other HOME-ARP Qualifying Populations.

All four HOME-ARP Qualifying Populations will remain eligible to apply for the City's HOME-ARP Rental Housing projects, which will not utilize a preference. Aside from the addition of this supportive services preference, all other components of the City of Toledo's HOME-ARP Allocation Plan will remain unchanged.

## PART II

### Public Participation

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 draft amendment was available for public review at the Department of Housing and Community Development, as well as at the following locations:

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

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

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

Lucas Metropolitan Housing  
435 Nebraska Avenue  
Toledo, Ohio 43604  
website: [www.lucasmha.org](http://www.lucasmha.org)

Toledo Lucas County Homelessness Board  
1220 Madison Avenue  
Toledo, Ohio 43604  
website: [www.endinghomelessnesstoledo.org](http://www.endinghomelessnesstoledo.org)

Toledo-Lucas County Public Library  
325 Michigan Street  
Toledo, Ohio 43604  
website: <https://www.toledolibrary.org/>

Lucas Co. Board of Developmental Disabilities  
1154 Larc Lane  
Toledo, Ohio 43614  
website: [www.lucasdd.info](http://www.lucasdd.info)

The Fair Housing Center  
326 N. Erie Street  
Toledo, OH 43604  
website: [www.toledofhc.org](http://www.toledofhc.org)

A public hearing regarding the amendment to be held on Wednesday, February 11, 2026 at 4:00 p.m.  
in Council Chambers.

**PART III**

**RESOLUTION**

**INSERT APPROVED AND SIGNED RESOLUTION HERE**