



**City of Toledo**

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# **FY 2025-2029 CONSOLIDATED PLAN & FY 2025-2026 ANNUAL ACTION PLAN**

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**PREPARED FOR SUBMISSION TO THE  
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**JULY 1, 2025 - JUNE 30, 2030**

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# Executive Summary

## ES-05: Executive Summary - 24 CFR 91.200(c), 91.220(b)

### Introduction

The City of Toledo has completed the Consolidated Planning process for the 2025-2029 Program Years. The purpose of the Plan is to identify the city's housing, community development, public service, and economic development needs, prioritize those needs, and develop goals and strategies about how funding will be allocated to eligible housing and community development activities to meet the city's priority needs. The Consolidated Plan provides the vision that guides policies and the use of city resources to address these important issues over a five-year period.

The City of Toledo is an Entitlement Community and receives annual allocation of Community Development Block Grant (CDBG) funds, HOME Investment Partnership Program (HOME) funds, and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development (HUD). The total amount of funding fluctuates but was approximately \$9.68 Million for the 2024-2025 Program Year. Over the past 5 years, each of the federal grants has seen a decrease in funding. The city anticipates receiving approximately **\$46.8 million** in total funding over the 5-year period from July 1, 2025 to June 30, 2030. Based on the trends in historical funding, the 5-year estimates by program are as follows:

- **CDBG:** \$34,434,897
- **HOME:** \$9,264,206
- **ESG:** \$3,123,982
- **Total:** \$46,823,085

The Consolidated Plan assists the city in making strategic and planful allocation decisions about how to use limited CDBG funds for housing, social services, public infrastructure, facility improvements, economic development, and other community development programs and projects.

The city contracted with CEW Advisors, Inc. to draft the Consolidated Plan following the prescribed format detailed by HUD and ensuring compliance with all relevant federal regulatory requirements. The plan was developed based on an analysis of demographic, housing and economic data, and information collected from consultation interviews with stakeholders, community meetings and focus groups, survey data, past program performance, current planning documents and studies, and other public input.

## Structure of the Plan

The 2025-2029 Consolidated Plan is divided into five sections:

- The Process (PR)
- Needs Assessment (NA)
- Market Analysis (MA)
- Strategic Plan (SP)
- First-Year Action Plan (AP)

**The Process** section describes the development of the Plan and discusses how citizens were involved in the process, and how service providers and other stakeholders were consulted in the development of the Plan. The section also shares key findings from the citizen participation and consultation processes.

**Needs Assessment** provides data, analysis, and other relevant information on the city's needs for affordable housing, homelessness, special needs housing and services, community development, and economic development. Throughout the Needs Assessment section, special attention is paid to the needs of Low and Moderate Income (LMI) households, racial and ethnic minorities, homeless persons, and non-homeless special needs populations (e.g. persons with HIV/AIDS, disabilities, the elderly, victims of domestic violence, and other populations.).

**Market Analysis** provides data and analysis on the local housing market conditions and economic landscape in the city. The Market Analysis is meant to supplement information gleaned from the Needs Assessment to identify goals that are tailored to the local context of Toledo. In this way, the purpose of the Housing Market Analysis is to ensure that the priority goals developed through the planning process will effectively work locally.

The **Strategic Plan** section is based on the findings from the Needs Assessment, Market Analysis, stakeholder and resident input, and review of additional planning documents and studies. The purpose of the Strategic Plan is to prioritize the needs identified through the Consolidated Planning process and create goals to direct the allocation of federal funds that maximize community impact and is driven by the preferences of those who are to benefit from these investments.

Finally, the **Annual Action Plan** describes the city's first year activities and projects for addressing the needs and priorities set forth in the Strategic Plan.

## Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The information contained in this section was compiled through significant consultation, community meetings, focus groups, review of previous studies and community needs assessments, and analysis of various public data sources, including the American Community Survey, the Comprehensive Housing Affordability Strategy data, the U.S. Bureau of Economic Analysis, the U.S. Bureau of Labor Statistics, the U.S. Department of Housing and Urban Development, and the Homelessness Management Information System. Additionally, as part of the citizen participation process, an online survey collected information from 590 Toledo residents to help supplement the data available from public sources and information collected from public service agencies and community service providers and community meetings.

Based on the information gathered from all these sources, the following is a summary of the key points in the Needs Assessment.

### Housing Needs

#### Housing Affordability

Toledo has experienced a population decline of 8% between 2010 and 2023. Over the same time period the city saw a drop of 1.6% in the total number of occupied housing units and a significant decrease in the number of vacant housing units (25%). Despite population decline and stable housing supply, housing affordability and increasing cost burden is a significant and growing concern for Toledo residents. Nearly one-third of all households in Toledo are paying more than 30% of their income on housing (cost burdened or severely cost burdened). There is a need for affordable homeownership and affordable rental housing throughout the city. This need is even more alarming when Toledo is often seen as one of the most affordable cities in the country.

#### Housing Rehabilitation

Toledo's housing stock is in various stages of disrepair, from non-compliant with property maintenance code due to roofing and window repairs, peeling paint, damaged siding, porches, and foundations, to severely dilapidated, vacant, abandoned, boarded, and fire-damaged. The steep population decline over the past 50 years has exacerbated these conditions, as most housing (83.5%) is older and requires more rehabilitation. After 30 or 40 years, homes typically need significant repairs or major rehabilitation, especially if poorly maintained. Additionally, midwestern weather problems like icy weather, heavy snow, and frigid temperatures, along with intense storm damage, increase repair needs. The housing rehabilitation needs are further compounded by the significant population decline and widespread vacancy and abandonment.

#### Housing Modifications

There is great interest among older individuals and those with mobility challenges to remain in their homes rather than moving into assisted living or nursing homes. As such, home modifications become necessary for individuals when they become less mobile to assist them getting into, out of, and around their homes (i.e., ramps, lifts, platforms, and modified stairs that allow for better

access). Individuals with mobility challenges need glide chairs to allow them to ascend and descend stairs, modified bathrooms, relocated laundry facilities to a more easily accessible area of the house, and kitchen upgrades to allow for easier access to counters, stovetops, and cupboards. Home modifications are much easier for homeowners, but renters face challenges when landlords are unwilling to modify the home.

### Public Housing

Lucas Metropolitan Housing (LMH) manages public housing in the city. Housing choice voucher holders are finding it increasingly more difficult to secure and remain in rental housing as rental prices keep increasing. Voucher holders can be priced out of the rental market because the voucher will not cover the full cost of rent. Anecdotally, landlords are becoming increasingly wary of leasing or accepting tenants who have a voucher. Despite ongoing outreach to landlords having a housing choice voucher does not necessarily mean equal access to the housing market. In addition, landlords are increasingly requesting first and last months' rent and a security deposit for leasing. For income constrained households this requirement creates an additional hurdle to accessing housing even when they have a voucher.

### Homelessness Needs

Estimating the total population of the unsheltered homeless presents a difficult challenge due to the transient nature of the homeless population in northwest Ohio. Further, estimating those who are at-risk of homelessness is equally challenging. In conversations with providers of homelessness services, through analysis of Homelessness Management Information System (HMIS) data and the Point-In-Time Count (PIT) data and based on discussions with the Lucas County Homelessness Board, there were 3,268 people that experienced homelessness during the 2024 calendar year. This includes 1,233 persons in families with children, and 2,035 persons in adult-only households. The total population of homeless individuals in the City of Toledo is estimated to be approximately 1,258 individuals on any given night. Homelessness in Toledo has grown considerably since 2020 and is estimated to have increased another 10% from 2024 to 2025.

### Non-Homeless Special Needs

There are households throughout the city that have special needs unrelated to homelessness. Some of these population groups include the elderly and frail elderly; those living with some type of physical or cognitive disability; persons with substance use disorders; persons with mental illness; and victims of domestic violence, dating violence, sexual assault, and stalking.

### Elderly and Frail Elderly

Toledo's growing senior population faces urgent challenges with housing affordability, transportation, and healthcare access. With 38.6% of senior households living alone and many on fixed incomes, the rising cost of housing is creating significant housing cost burdens. Many seniors lack reliable transportation leading to social isolation and reduced access to essential services. The elderly and frail elderly populations have additional unique challenges that come with age, including chronic and other medical conditions, higher rates of physical and mental disabilities (such as Alzheimer's and dementia), mobility challenges, and higher health care costs. A

significant concern for the senior population is the eventual transition from independent living to assisted living and nursing home care.

#### Persons with Physical or Cognitive Disabilities

There is a large number of Toledo residents living with a disability, with 29,584 persons aged 18-64 living with a disability (18.1% of the total population), and another 38.4% of older individuals aged 65 with a disability. Residents that are physically or cognitively disabled have special housing needs to accommodate their specific conditions.

#### Persons Living with HIV/AIDS and their Families

The total number of persons living with HIV in Lucas County as of 2023 was 1,058. Individuals living with HIV/AIDS have specific housing needs and require stable housing to maintain a consistent medication regime.

#### Persons with Substance Use Disorders

Substance use disorders (SUDs) impact a significant portion of Toledo's population, reflecting broader statewide trends in Ohio. An estimated 11,500 Toledo residents aged 12 and older struggle with Alcohol Use Disorder, while approximately 8,100 experience Illicit Drug Use Disorder, and 3,150 suffer from Opioid Use Disorder.

#### Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

In 2023, the Toledo Police Department reported 1,691 domestic violence incidents that resulted in a charge, 247 that resulted in some other charge, and another 6,305 domestic violence incidents that did not result in any charge. The vast majority of these incidents involve victims who are women.

### Non-Housing Community Development Needs

#### Public Facilities

The need for public facilities includes neighborhood community centers, senior centers, adequate healthcare centers, additional childcare facilities providing affordable afterschool programs and summer programs for children and teens, public parks, and recreation area improvements.

#### Public Infrastructure Improvements

Like many post-industrial cities, Toledo has experienced deterioration of its aging road infrastructure, sidewalks, sewers, catch basins, buildings, and schools. The primary public infrastructure needs include street and traffic management to better support all users, including pedestrians, cyclists, and public transit riders, and automobile traffic; better pedestrian infrastructure; sewer and stormwater management; public transportation; and green infrastructure and environmental sustainability.

#### Public Services

The primary public service needs are crime prevention; afterschool and summer recreation programs for youth and teens; mental health services; affordable childcare; programs or services for the elderly and frail elderly; adult education / workforce training classes; financial literacy

programs; services for victims of domestic violence; healthcare services; programs and services for the homeless.

Each of these is discussed more fully in the Needs Assessment section.



## 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.

Toledo effectively administers its HUD-funded programs, achieving its annual outcomes consistently. The 2023 Program Year (July 1, 2023–June 30, 2024) marks Year 4 of the City's 2020–2024 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
- 1,541 people assisted (13 youth, 1,482 seniors, 46 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**.

## Neighborhood Revitalization Strategy Areas (NRSAs)

In 2023, HUD approved three NRSA designations for Toledo: Old South End, Englewood, and Junction Neighborhood. These areas are key to revitalization efforts.

### *Old South End NRSA Highlights:*

- 33 homes and 7 roofs repaired
- 180 people received pesticide-free produce
- \$87K in lead/weatherization work
- 21 demolitions
- \$200K for Maya Park, \$1M for Danny Thomas Amphitheater
- \$99.6K in Vibrancy Awards, \$7.8M in road projects

### *Englewood NRSA Highlights:*

- 10 roofs repaired, \$110K in lead/weatherization
- 17 demolitions, 27 streetlights added
- \$140K for Robinson Athletic Field, \$150K for Open-air Shelter
- \$70K in Vibrancy Awards, \$3.4M for Swayne Field renovation

### *Junction Choice Neighborhood NRSA Highlights:*

- 7 roofs repaired, 35 homes demolished
- 34 new streetlights, \$1.5M in roadwork
- 3 homes rehabbed (\$75K)

## Strategic Goals and Community Impact

The City prioritized HUD national objectives: aiding low- to moderate-income (LMI) residents and eliminating slum/blight. Guided by the Five-Year Plan, Toledo remains focused on:

- Affordable, safe housing
- Homelessness prevention
- Public facility and infrastructure improvements
- Fair housing enforcement
- Basic needs (food, life skills, healthcare)

Through HOME funds, **44 first-time homebuyers** received assistance and completed HUD-certified homeownership training. DHCD and partners also continue efforts in housing rehabilitation, lead hazard control, and homelessness prevention.

## Community Gardens & Neighborhood Improvement

Programs supporting community gardens reached **5,345 individuals**, helping reduce blight, increase food access, and promote neighborhood engagement.

## **Fair Housing**

Toledo supports the **Fair Housing Center**, which received over 2,000 inquiries, 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.

## **Summary of citizen participation process and consultation process**

Local, regional, and state agency consultation and citizen participation occurred through a variety of means. One-on-one conversations, community meetings, focus groups, an online housing and community needs survey, virtual roundtable discussions, public hearings, news articles, requests for proposals, and consultations with businesses, nonprofit agencies, municipal staff, and other stakeholders. The information collected through all these means was used to inform this Plan's priorities and goals.

Requests for input on community needs were made to community-based organizations, neighborhood associations, public service agencies, public library, public housing authority, and other local and regional agencies. Information on community needs was also collected through Public Service agency reports, review of additional research studies, community needs assessments, and from various community meeting notes. During the solicitation process for funds, a Request for Proposals is published, and respondents are required to state the community need they are requesting funding to address.

Residents were able to participate in the development of the Consolidated Plan and offer public comment on the draft Consolidated Plan in several ways. A community needs assessment survey was created and available online for citizens to offer comments on priority needs in Toledo with 590 respondents. Several community meetings and focus group discussions were held during the development of the plan to ensure the needs of the community were fully recognized and embedded in the Consolidated Plan. Public meetings, agency roundtable discussions, and focus groups were held on January 6, January 7, January 8, January 9, and January 23 with 159 attendees. Public hearings were held on April 3, 2025, April 24, 2025, May 1, 2025, July 10, 2025, and July 15, 2025 at One Government Center, Council Chambers to offer additional opportunities for the public to review and comment on the Consolidated Plan and Annual Action Plan.

## Summary of public comments

Public comments from the January community meetings and roundtable discussions highlighted the top priority needs of the community, these included affordable housing, homelessness, public service needs, infrastructure and facility improvements, and economic development. More information is available in Section PR-15.

Public hearings were also held on April 3, 2025, April 24, 2025, and May 1, 2025 at One Government Center, Council Chambers to offer additional opportunities for the public to comment on the Consolidated Plan. There was one comment received from an attendee who expressed their appreciation for the work.

The Toledo Housing and Community Development Committee met on July 10, 2025 to discuss the allocations for CDBG, HOME, and ESG. There were three public comments during the meeting.

- Joe Balderas, Sofia Quintero Arts and Culture Center: Discussed the community garden program and the impact of delivering 3,000 pounds of fresh food for free to the community.
- William Farnsell, CEO of Neighborworks: Discussed the agency and the work they perform in the community and asked for their funding not to be revoked, and the consequences to the agency and community services if their funding is eliminated.
- Veronica Martinez, Managing Attorney with Legal Aid of Western Ohio (LAWO): Spoke about the services provided in the area and asked the council to accept the recommendation for funding LAWO.
- David Johnson, Johnson Produce Market: They operate a fresh food market on Pulaski Street. They were denied funding for a second year and they wanted to discuss what assistance they can receive for an allocation of award for their project.
- Noah Woods, Staff Attorney at Fair Housing Center: They expressed appreciation for the award and spoke about their work to prevent housing discrimination and assistance across the city.
- Tracy Britt, Board Member of Neighborworks: Discussed the valuable work of the organization and made a request for funding of some amount rather than the complete elimination of their funding.

The full Toledo City Council held a meeting on July 15, 2025 for approval of the specific allocations for the 2025-2026 Annual Action Plan. No public comments were offered.

Finally, there were two written comments.

- Joanna Byers - Area Office on Aging of Northwest Ohio: Comments were focused on rent stabilization need to minimize homelessness, especially among single adult households and those age 60+; the burdens placed on housing developers caused by the Project Labor Agreement; the need for quick housing options like prefab housing; immediate rental assistance and why Toledo doesn't use HOME funds for Tenant Based Rental Assistance;

options for local funding; the growing homelessness problem; and out-of-town investors impacting the local housing market.

- Tom Names: Submitted a lengthy 17 page document with a significant amount of suggestions and recommendations for updates and changes to the Con Plan. These include word choices, references to broader explanations of language and phrases used in the Consolidated Plan to make it more readable and understandable, to substantial recommendations for policy changes. The full document is included in the attachments.

## **Summary of comments or views not accepted and the reasons for not accepting them**

The City of Toledo is in agreement with the need for rental assistance; however, due to the lack of resources, the City is choosing to utilize its HOME funding specifically for home improvements, new construction, and conversion to expand the total amount of deed restricted affordable housing in the City. Many additional recommendations for updates and changes to the Con Plan, or inclusion of myriad additional programs and services, are not possible given the limited amount of funding available. Additional comments were related to studies and plans that were reviewed as part of the development of the Con Plan but are independent documents.

## **Summary**

This Five-Year Consolidated Plan for years 2025-2029 identifies goals, objectives and strategies to address the City of Toledo's housing, community, and economic development needs. These needs were identified through an extensive citizen participation and stakeholder consultation process that involved neighborhood residents, service providers, state agencies, and other community partners. The Consolidated Plan guides the city's use of CDBG funds to accomplish goals addressing the articulated needs of the community described more fully in the Needs Assessment and the existing landscape of to meet these needs described in the Market Analysis.

Over the next five years, Toledo will deliver housing, community, and economic development services to meet the needs highlighted in the Plan. The city will seek to balance the need for housing, community, and economic development needs with the resources that the city receives through the Community Development Block Grant, HOME Investment Partnership Program, and the Emergency Solutions Grant. The city seeks to leverage these funds through innovative partnerships, supplemental and braided grant funding whenever possible to maximize the impact it can have on the quality of life for Toledo residents. Given this comprehensive approach and the continued capacity of the City, this plan's goals and objectives are feasible and achievable.

# The Process

## PR-05: Lead & Responsible Agencies- 24 CFR

### 91.200(b)

#### Responsible Agencies

*Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source*

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

PR-05 Figure 1: Responsible Agencies		
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

#### Narrative

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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# **PR-10: Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

## **Introduction**

In developing the Consolidated Plan, the City of Toledo conducted a thorough outreach effort to engage with critical stakeholders in the City, County, and State. The City utilized many outreach and engagement efforts and had regular communication with residents, community agencies, and neighborhood associations. The City contracted with CEW Advisors, Inc. to conduct a comprehensive community outreach, stakeholder engagement, and public consultation process. In late 2024 and early 2025, CEW Advisors, Inc., on behalf of the City of Toledo, began consulting with City Departments, nonprofit service agencies, Community and Housing Development Corporations, other State and County Agencies and Departments, business organizations, Chamber of Commerce, the Public Housing Authority, and the public to discuss short-term and long-term housing, homelessness, community development, and economic development needs for the residents of Toledo and strategies for meeting these needs.

This outreach effort was designed to record stakeholder input and develop an informed set of priority needs to help guide the City's investment strategies over the 2025-2029 time period for this Consolidated Plan. This outreach effort included multiple stakeholder interviews, where organizations, service providers, and residents of all types from across the city discussed the City's needs and discussed strategies to address those needs. An online survey allowed for additional opportunities for Toledo residents to add their voice and articulate community needs. A series of community meeting and public hearings allows for the public to be kept informed about the progress of the plan and offer comments on its priorities and funding allocations.

Additionally, The Fair Housing Center (TFHC) conducted the Citizen Participation process for the 2025 City of Toledo Analysis of Impediments to Fair Housing Choice (AI) by creating and distributing an online community survey via Fillout. Community responses were collected from August 19, 2024, through October 24, 2024. The survey was sent via email through TFHC's distribution list, posted on TFHC's social media channels and website, and shared from local news organizations, gaining approximately 201,000 impressions. In total TFHC collected eighty-five complete responses and 88 partial responses. Out of the eighty-five completed responses, there were 74 responses from individuals, and 11 responses on behalf of organizations in Greater Toledo. TFHC also conducted three focus groups open to the community. The first was held at the Mott Branch Library, the second at the LaGrange Branch Library, and the third at the Birmingham Branch Library. There was a total of 27 attendees across the focus group sessions, representing various sectors of the community including residents of Toledo, real-estate professionals, representatives from community organizations, and government officials.

*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(l)).*

The City of Toledo continues to promote better collaboration in all housing, health, and interrelated service efforts, and actively partners with local organizations in carrying out activities designed to improve the quality of life for city residents. The City regularly consults with various agencies in the development of plans and opportunities to enhance cooperation and collaboration in the delivery of services to residents. Each year, through the cooperation with local organizations, efforts are aimed at enhancing the coordination between service and housing agencies and private and public sector agencies to reduce 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
- Greater Toledo Community Foundation
- University of Toledo
- Lucas Metropolitan Housing (LMH)
- Mental Health and Recovery Services Board of Lucas County (MHRSBLC)
- Lucas County Children's Services Board (LCCS)
- Lucas County Veterans Service Commission
- Lucas County Land Reutilization Program (Land Bank)
- Toledo Public Schools
- Lucas County
- Private Businesses

A continued commitment to these partnerships and collaborations is critical in achieving the desired outcomes for the community. For example, the MHRSBLC provides funding to multiple entities that provide treatment and support services for youth and adults in the behavioral health system, thereby assisting in alleviating one of the root causes of homelessness. Further, DHCD works closely with the Lucas County Land Bank to acquire properties for new construction, rehabilitation, land reutilization and demolition to reduce blight conditions and provide additional opportunities for the development of affordable housing. The City is an important and effective advocate and source of support in moving projects forward that otherwise would not reach completion due to lack of resources, supporting community organizations dedicated to improving the housing stock, such as LMH, community development corporations and other local nonprofits.

Other relationships exist that consist of the business community, faith-based organizations, public service entities, housing providers, foundations, and other community organizations that advocate on behalf of those in need. Increased communication with all community stakeholders will continue to result in more formalized relationships that nurture and promote the City of Toledo's plans 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, accessible, 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 as a whole, to ensure intentional interconnection, responsiveness, and equity. 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 affordable and easily accessible.

The following goals are embedded in the 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 Toledo Lucas County 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 persons 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 persons 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 and evaluate outcomes, and develop funding, policies and procedures for the 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 partners with the Toledo Lucas County Homelessness Board (TLCHB) in several ways to address homelessness in the community. Here are some key aspects of their 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 including permanent supportive housing.
- **No Barriers Housing:** This initiative, based on the national Housing First model, 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.

## Participating Agencies

*Describe agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities.*

Table 1 – Agencies, groups, organizations who participated		
1	<b>Agency/Group/Organization</b>	Arts Commission of Greater Toledo, Inc.
	<b>Agency/Group/Organization Type</b>	Public infrastructure and Arts
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Priorities
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and increased collaboration among organizations.
2	<b>Agency/Group/Organization</b>	Believe Center
	<b>Agency/Group/Organization Type</b>	Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and need for increased services.
3	<b>Agency/Group/Organization</b>	Burroughs Neighborhood Organization
	<b>Agency/Group/Organization Type</b>	Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and need for increased services.
4	<b>Agency/Group/Organization</b>	Cherry Legacy Neighbors
	<b>Agency/Group/Organization Type</b>	Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and need for increased services.
5	<b>Agency/Group/Organization</b>	Cherry Street Mission
	<b>Agency/Group/Organization Type</b>	Services-Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Strategy Non-Homeless Special Needs

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Tour of facilities, consultation with agency staff, through focus group and survey questionnaire. Input on priority needs and need for increased services.
6	<b>Agency/Group/Organization</b>	Community Reinvestment Coalition-Englewood SW
	<b>Agency/Group/Organization Type</b>	Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and need for increased services.
7	<b>Agency/Group/Organization</b>	Department of Housing and Community Development
	<b>Agency/Group/Organization Type</b>	Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Non-Housing Community Development Strategy Anti-Poverty Strategy Lead-Based Paint Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Regular communication with departmental staff regarding priority needs, market analysis, and strategic plan.
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
8	<b>Agency/Group/Organization</b>	Department of Building Inspection and Code Compliance
	<b>Agency/Group/Organization Type</b>	Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Lead-Based Paint Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Code Enforcement Division was consulted directly in the completion of the Needs Assessment and Market Analysis. The Code Enforcement Department is directly involved in ensuring safe and adequate housing remains available in the community. Through consultation with Code Enforcement, the Department of Neighborhoods is better able to address the housing needs of LMI residents and improve neighborhood conditions in LMI areas.
9	<b>Agency/Group/Organization</b>	Department of Economic Development
	<b>Agency/Group/Organization Type</b>	Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Non-housing Community Development Strategy Anti-Poverty Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Economic Development Director was consulted to discuss the need for and plans to address local economic development opportunities. The DHCD collaborates regularly with the Economic Development team in assisting local businesses and attracting new businesses to Toledo. Leveraging CDBG funds with other grants and private capital was prioritized.
10	<b>Agency/Group/Organization</b>	East Toledo Family Center
	<b>Agency/Group/Organization Type</b>	Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consultation with agency staff and through focus group and survey questionnaire. Input on priority needs and need for increased services.
11	<b>Agency/Group/Organization</b>	Equitas Health
	<b>Agency/Group/Organization Type</b>	Services - Persons with HIV/AIDS
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The local office of the AIDS Resource Center (ARC) of Ohio was consulted in determining the specific housing and service needs of those living with HIV/AIDS and how their needs are met in the community. The city will continue to coordinate efforts with ARC as needed.
12	<b>Agency/Group/Organization</b>	Family House
	<b>Agency/Group/Organization Type</b>	Services – Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with Children Non-Homeless Special Needs Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consultation with agency staff and through focus group and survey questionnaire. Input on priority needs and need for increased services.
13	<b>Agency/Group/Organization</b>	Grace Community Center
	<b>Agency/Group/Organization Type</b>	Services - Children Services - Elderly Persons Services - Persons with Disabilities Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Non-Housing Community Development Strategy



	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and increased collaboration among organizations.
14	<b>Agency/Group/Organization</b>	Historic Vistula Foundation
	<b>Agency/Group/Organization Type</b>	Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with Children Non-Homeless Special Needs Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs in the Vistula neighborhood and need for increased collaboration among organizations.
15	<b>Agency/Group/Organization</b>	Junction Coalition
	<b>Agency/Group/Organization Type</b>	Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and need for increased services.
16	<b>Agency/Group/Organization</b>	Leading Families Home dba Beach House
	<b>Agency/Group/Organization Type</b>	Services - Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with Children Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and need for increased services.
17	<b>Agency/Group/Organization</b>	Lincoln School Coalition
	<b>Agency/Group/Organization Type</b>	Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and need for increased services.
18	<b>Agency/Group/Organization</b>	Local Initiatives Support Corporation Toledo
	<b>Agency/Group/Organization Type</b>	Housing Community Development Financial Institution
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development Market Analysis



	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through consultation. Discussed priority needs for homeownership and affordable housing capacity building. Need for developer capacity building to attract private sector investments and leverage federal funding for neighborhood development. Additionally, spoke on the impact of Project Labor Agreement, and its impact on the development of affordable housing.
19	<b>Agency/Group/Organization</b>	Lucas County Board of Developmental Disabilities
	<b>Agency/Group/Organization Type</b>	Services - Housing Services - Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Data was compiled through the agency's website and validated through consultation. As the integration in the community for people with disabilities continues to expand, the city will collaborate with the Board of Developmental Disabilities as needed.
20	<b>Agency/Group/Organization</b>	Lucas County Emergency Management Agency
	<b>Agency/Group/Organization Type</b>	Other Government – County Other - Emergency Management Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Other - Hazard Mitigation and Housing Vulnerability
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Discussion and review of Hazard Mitigation Plan. Identified mitigation and resiliency strategies that will be used to enhance the specifications and rehabilitation standards under owner-occupied home repair, rental housing and acquisition and rehabilitation and new construction for homeownership
21	<b>Agency/Group/Organization</b>	Lucas County Land Reutilization Corporation
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through consultation with leadership. Input on priority needs for affordable housing, neighborhood revitalization, and strategy planning for targeting investments. Conversation also highlighted the opportunity for alignment in community redevelopment and opportunities to collaborate with DHCD and local residents on targeted strategies.
22	<b>Agency/Group/Organization</b>	Lucas County Veterans Service Commission
	<b>Agency/Group/Organization Type</b>	Regional Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Needs - Veterans Non-Homeless Special Needs Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through consultation. Input on priority needs for affordable housing and services for veterans.
23	<b>Agency/Group/Organization</b>	Lucas Housing Services Corporation
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through consultation. Input on priority needs for affordable housing, public housing, financing for development of new housing units, and strategy planning for targeting investments. Conversation also highlighted the opportunity for alignment in community redevelopment.
24	<b>Agency/Group/Organization</b>	Lucas Metropolitan Housing (LMH)
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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. 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.
25	<b>Agency/Group/Organization</b>	Maumee Valley Habitat for Humanity
	<b>Agency/Group/Organization Type</b>	Housing Services – Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Input on priority needs for homeownership and affordable housing capacity building. Spoke on the impact of the local Project Labor Agreement and its impact on the development of Affordable Housing in the City of Toledo.
26	<b>Agency/Group/Organization</b>	Mental Health & Recovery Services Board of Lucas County
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Services-Health

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consultation was done through participation in focus group and Consolidated Plan Steering Committee meetings and completion of agency survey as well as review of the agency materials on their website. The need for special needs housing with support services and increased collaboration among service agencies was prioritized.
27	<b>Agency/Group/Organization</b>	Neighborhood Health Association
	<b>Agency/Group/Organization Type</b>	Services – Health Health Agency Regional Organization Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homelessness Needs - Veterans Market Analysis Non-Housing Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group, participation in community meetings, and one-on-one consultation. Discussed the health and service needs of Toledo residents, homelessness, housing needs, and better coordination of health services agencies in the city.
28	<b>Agency/Group/Organization</b>	NeighborWorks, Toledo Region
	<b>Agency/Group/Organization Type</b>	Housing Services – Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group, participation in community meetings, and completion of survey questionnaire. Input on affordable housing priority needs, homelessness, and comprehensive neighborhood redevelopment and homeownership. Spoke on the impact of the local Project Labor Agreement and its impact on the development of Affordable Housing in the City of Toledo
29	<b>Agency/Group/Organization</b>	OhioMeansJobs - Lucas County
	<b>Agency/Group/Organization Type</b>	Services – Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Non-Housing Community Development Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	OhioMeansJobs, the local one-stop systems that provides workforce services to individuals and businesses, was consulted about the economic development section of the market analysis. As needed, the DHCD will continue to complement the services offered by OhioMeansJobs through services offered by non-profit partners and the City's Department of Economic and Business Development.
30	<b>Agency/Group/Organization</b>	Old West End Neighborhood Initiatives
	<b>Agency/Group/Organization Type</b>	Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and need for increased services in the Old West End neighborhood.
31	<b>Agency/Group/Organization</b>	Pathway Toledo
	<b>Agency/Group/Organization Type</b>	Services - Children Services - Elderly Persons Services - Homeless Services - Employment Regional Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Non-Housing Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and one-on-one consultation. Input on priority needs for housing and services for special needs population in Toledo and homelessness.
32	<b>Agency/Group/Organization</b>	Sofia Quintero Art and Cultural Center
	<b>Agency/Group/Organization Type</b>	Services - Children Services - Education Public Facilities Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Priorities
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and increased collaboration among organizations. Promoting the arts in the community. Spoke about the needs of the community, rising housing costs, and being in a "food desert." How the community needs have risen so much that the agency has shifted its mission in order to support the local Hispanic community.
33	<b>Agency/Group/Organization</b>	St. Paul's Community Center
	<b>Agency/Group/Organization Type</b>	Services - Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically Homeless Homelessness Strategy Non-Homeless Special Needs

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and need for increased services.
34	<b>Agency/Group/Organization</b>	TARTA
	<b>Agency/Group/Organization Type</b>	Regional Organization Planning Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through consultation. Discussed TARTA's strategic planning efforts and how to align the Consolidated Plan efforts. Discussed transportation networks and how they support economic growth in the region.
35	<b>Agency/Group/Organization</b>	Toledo Lucas County Homelessness Board
	<b>Agency/Group/Organization Type</b>	Continuum of Care Lead Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Toledo Lucas County Homelessness Board (TLCHB) is consulted regularly in all aspects related to ending homelessness in Toledo. The TLCHB was extensively consulted in the development of this Consolidated Plan and assisted with the promotion of the online Community Survey. The City will continue to work collaboratively with the TLCHB on all issues related to homelessness.
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
36	<b>Agency/Group/Organization</b>	Toledo Building Services
	<b>Agency/Group/Organization Type</b>	Services – Employment Business Leaders Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Non-Housing Community Development Strategy Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and need for increased services.
37	<b>Agency/Group/Organization</b>	Toledo Design Collective
	<b>Agency/Group/Organization Type</b>	Regional Organization Planning Organization Civic Leaders Neighborhood Organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Non-Housing Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group, consultation, and survey questionnaire. Input on priority needs for housing and services.
38	<b>Agency/Group/Organization</b>	Toledo Fair Housing Center
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis Fair housing
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Toledo previously contracted 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.
39	<b>Agency/Group/Organization</b>	Greater Toledo Community Foundation
	<b>Agency/Group/Organization Type</b>	Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through consultation with Vice President to discuss urgent community needs in Toledo, focusing on affordable housing and homelessness, and the role of the Foundation in supporting programs in the city and developing the capacity of local agencies to meet the needs of the community.
40	<b>Agency/Group/Organization</b>	Toledo Public Schools
	<b>Agency/Group/Organization Type</b>	Services - Children Services - Education Other Government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with Children Homelessness Needs - Unaccompanied Youth Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consultation with Executive Director of Student Intervention & Supports. Discussed homeless needs of students and their families, affordable housing needs of the community, and supports provided through McKinney-Vento.



41	<b>Agency/Group/Organization</b>	Toledo Regional Chamber of Commerce / Small Business Development Center
	<b>Agency/Group/Organization Type</b>	Services - Education Services - Employment Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Non-Housing Community Development Strategy Anti-Poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person consultation. Discussed economic development in the city, and the workforce and infrastructure needs of the business community, small business development and entrepreneurship.
42	<b>Agency/Group/Organization</b>	Toledo - Lucas County Port Authority
	<b>Agency/Group/Organization Type</b>	Regional Organization Business Leaders Private Sector Banking/Financing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Non-Housing Community Development Strategy Anti-Poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person consultation. Discussed economic development in the city, recent projects by the Port Authority, and how to better coordinate services with the city.
43	<b>Agency/Group/Organization</b>	University of Toledo - Minority Business Assistance Center
	<b>Agency/Group/Organization Type</b>	Regional Organization Business Leaders Services-Education Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Non-Housing Community Development Strategy Anti-Poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and online survey. Discussed economic development in the city, and the workforce and infrastructure needs of the business community, small business development and entrepreneurship.
44	<b>Agency/Group/Organization</b>	YMCA of Greater Toledo
	<b>Agency/Group/Organization Type</b>	Services - Children Services - Elderly Persons Services - Persons with Disabilities Services – Health Regional Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group, consultation, and survey questionnaire. Input on priority needs for housing and services.

45	<b>Agency/Group/Organization</b>	YWCA of Northwest Ohio
	<b>Agency/Group/Organization Type</b>	Housing Services - Children Services - Victims of Domestic Violence Services - Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with Children Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group, consultation, and survey questionnaire. Input on priority needs for housing and services with a particular emphasis on women, families and victims of domestic violence.
46	<b>Agency/Group/Organization</b>	Zablocki Senior Center
	<b>Agency/Group/Organization Type</b>	Services - Elderly Persons Services - Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group, consultation, and survey questionnaire. Input on priority needs for housing and services.
47	<b>Agency/Group/Organization</b>	Zepf Center
	<b>Agency/Group/Organization Type</b>	Housing Services – Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through focus group and survey questionnaire. Input on priority needs and affordable housing capacity building. Need for increased capacity among affordable housing developers to attract real estate investments.

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

CEW Advisors, Inc., the consultant hired by the City of Toledo, scheduled several one-on-one conversations with organizations and agencies engaged in affordable housing, homelessness, social service delivery, senior and youth programming, community and economic development, and other relevant issue areas. Most of these organizations and agencies have existing relationships and partnerships with the city. Every effort was made to be inclusive of every type of organization in the city required for the Consolidated Planning process.

There were no agency types serving the Toledo community that were not consulted during the development of this Consolidated Plan. Further, the information gleaned from the various agencies and community members consulted was largely in alignment and self-reinforcing. Because of CDBG's broad application, most community interests have the potential to impact priority needs and their solutions.



## Other planning efforts

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

Table 2 – Other local / regional / federal planning efforts		
Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Toledo / Lucas County Continuum of Care Strategic Plan 2024	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.
Moving Forward 2055: Regional Transportation Plan	Toledo Metropolitan Area Council of Governments	Local and regional public transportation systems were analyzed in this plan. The City continually evaluates ways to improve transportation services and accessibility to low- and 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. One of the goals of Moving Forward is to improve the quality, accessibility, and efficiency of the multimodal personal transportation system.
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.
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 and advancing racial equity, 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.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
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.
2021-2024 Lucas County Community Health Improvement Plan	Healthy Lucas County	The goal of increasing availability of and access to health services for low- and moderate-income residents is a goal of both the CHIP plan and the City's 5-year Consolidated Plan. The CHIP plan specifies four priority areas: mental health & addiction, chronic disease, maternal & infant health, and community conditions. These were also priority needs that were highlighted through consultation and community engagement. DHCD participates in the creation, prioritization, and implementation of their Action Plan.
Bridges out of Poverty	Lucas County Impact Coalition	Lucas County Impact Coalition is utilizing the Bridges out of Poverty model to educate service providers and create a unified effort towards reducing poverty. The goals of the City's 5-year Consolidated Plan also seek to reduce poverty and improve citizens' quality of life.
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	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.
Lucas County Workforce Development Board Strategic Plan 2021	Lucas County Workforce Development Board	The mission of the Lucas County Workforce Development Board is to deliver innovative workforce solutions to businesses and job seekers to accelerate regional economic growth and individual prosperity. The goals of the strategic plan align with the Consolidated Plan as they are focused on preparing individuals to be successful in employment with local and regional employers.
Lucas County Multi-Jurisdictional Hazard Mitigation Plan	Lucas County Emergency Management Agency	The goals of the hazard mitigation plan and the mitigation action plan align with the City's housing strategy including home repair, homeownership, and rental housing. As well, identifying the disparate impact of disasters on LMI households.

*Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))*

As discussed above, Toledo has a productive working relationship with the state and county agencies in many ways. The city interacts with State agencies and departments directly through the DHCD and on a regional basis through local non-profit social service agencies. The City of Toledo is

in regular contact with various public agencies to ensure funding priorities comport with and are coordinated with current community development needs, goals, and objectives. As strategies to address the goals of the Consolidated Plan are implemented, appropriate partnerships will be enhanced or developed to address community issues efficiently and effectively.

### **Narrative (optional)**

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.

# PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(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 is an essential part of the consolidated planning process because it helps ensure that decisions are made with careful attention to articulated community needs and prioritizes the preferences of Toledo residents. Further, the input of stakeholders and community members generates additional public awareness about the consolidated planning process. Public involvement in the process allowed for the perspectives of residents to be elevated and highlighted during the decision-making process, which gave the City of Toledo more relevant information to develop the Consolidated Plan's priorities and goals. Receiving input and buy-in from planning officials, stakeholders, agency staff, and residents of Toledo played a significant role in helping the plan take shape.

The City of Toledo contracted with CEW Advisors, Inc. to conduct a broad consultation and community engagement process to develop the Consolidated Plan. This process involved dozens of stakeholder interviews with public services organizations, chamber of commerce, city staff, community groups and associations, several community meetings, focus groups with neighborhood residents and business owners, and an online survey to supplement the public hearings process. These public engagements and citizen participation methods were used to share information about the Consolidated Planning process, identify relevant community needs, and develop a set of priorities and goals to guide city actions over the next five years.

Information gathered from the consultation process, previous surveys and community meetings, and the citizen participation process was generally self-reinforcing and aligned with the previous information collected from other planning processes. All the survey results were collected and incorporated in the Needs Assessment and Market Analysis sections of the Consolidated Plan and helped inform the selection process for funding projects described in the Strategic Plan and Annual Action Plan sections.

## Citizen Participation Outreach

Table 3 – Citizen Participation Outreach		
1	Mode of Outreach	Internet Outreach
	Target of Outreach	Non-targeted/broad community
	Summary of response/attendance	Online survey had a total of 590 survey responses that were received from residents throughout the city.
	Summary of comments received	The Citywide survey results are used and made available as part of the Needs Assessment and Market Analysis.
	Summary of comments not accepted and reasons	Not Applicable. All comments were accepted.
	URL (If applicable)	<a href="https://bit.ly/ToledoCommunitySurvey">https://bit.ly/ToledoCommunitySurvey</a>
2	Mode of Outreach	Third Party Partner Meeting December 12, 2024 Walbridge Park
	Target of Outreach	Non-targeted/broad community
	Summary of response/attendance	Community Agency representatives attended a community meeting at the Walbridge Park on December 12, 2024.
	Summary of comments received	Attendees discussed the Consolidated Planning process, the highest level community needs that they are seeing, and the programs and services available in the community. The information gathered from the community meeting was incorporated into the Needs Assessment and Market Analysis.
	Summary of comments not accepted and reasons	Not Applicable. All comments were accepted.
	URL (If applicable)	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
3	Mode of Outreach	Public Meeting January 6, 2025 Lagrange Library
	Target of Outreach	Non-targeted/broad community
	Summary of response/attendance	A total of 25 residents attended a community meeting at the Lagrange Library on January 6, 2025
	Summary of comments received	Attendees participated in several exercises to identify the highest priority needs in the community. These included Affordable Housing, Programs for Children Youth and Teens, Home Repair Program, Jobs and Economic Development, and Public Safety / Crime Prevention. The information gathered from the community meeting was incorporated into the Needs Assessment and Market Analysis.
	Summary of comments not accepted and reasons	Not Applicable. All comments were accepted.
	URL (If applicable)	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>

4	<b>Mode of Outreach</b>	Virtual Roundtable Discussion January 7, 2025
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	A total of 10 participants from various community agencies participated in a roundtable discussion on January 7, 2025.
	<b>Summary of comments received</b>	Attendees discussed urgent priorities in the community. Key priorities included Affordable Housing and Housing Conditions; Workforce Development; Health and Mental Health Services including Crisis Response; Food Insecurity; Early Childhood Education; Service Duplication and Coordination Challenges; and Economic Development Needs.
	<b>Summary of comments not accepted and reasons</b>	Not Applicable. All comments were accepted.
	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
5	<b>Mode of Outreach</b>	Public Meeting January 7, 2025 Believe Center
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	A total of 18 residents attended a community meeting at the Believe Center on January 7, 2025
	<b>Summary of comments received</b>	Attendees participated in several exercises to identify the highest priority needs in the community. These included Affordable Housing, Programs for Children Youth and Teens, Jobs and Economic Development, Home Repair Program, Workforce Development / Skills Training, and Parks / Playgrounds / Sports / Recreation. The information gathered from the community meeting was incorporated into the Needs Assessment and Market Analysis.
	<b>Summary of comments not accepted and reasons</b>	Not Applicable. All comments were accepted.
	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
6	<b>Mode of Outreach</b>	Virtual Roundtable Discussion January 8, 2025
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	A total of 8 participants from various community agencies participated in a roundtable discussion on January 8, 2025.
	<b>Summary of comments received</b>	Attendees discussed urgent priorities in the community. Key priorities included Affordable Housing and Homelessness; Failure of Discharge Planning; Vistula Neighborhood & Gentrification Concerns; and Nonprofit Capacity & Equity in Funding.
	<b>Summary of comments not accepted and reasons</b>	Not Applicable. All comments were accepted.

	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
<b>7</b>	<b>Mode of Outreach</b>	Public Meeting January 8, 2025 Mott Library
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	A total of 56 residents attended a community meeting at the Mott Library on January 8, 2025
	<b>Summary of comments received</b>	Attendees participated in several exercises to identify the highest priority needs in the community. These included Programs for Children Youth and Teens, Affordable Housing, Home Repair Program, Jobs and Economic Development, and Workforce Development / Skills Training. The information gathered from the community meeting was incorporated into the Needs Assessment and Market Analysis.
	<b>Summary of comments not accepted and reasons</b>	Not Applicable. All comments were accepted.
	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
<b>8</b>	<b>Mode of Outreach</b>	Virtual Roundtable Discussion January 9, 2025
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	A total of 4 participants from various community agencies participated in a roundtable discussion on January 9, 2025.
	<b>Summary of comments received</b>	Attendees discussed urgent priorities in the community. Key priorities included Affordable Housing and Homelessness; Emergency Shelter Challenges; Barriers to Housing Access; Neighborhood Revitalization in Vistula; Capacity and Sustainability of Community-Based Organizations; and Needs for Additional Collaboration.
	<b>Summary of comments not accepted and reasons</b>	Not Applicable. All comments were accepted.
	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
<b>9</b>	<b>Mode of Outreach</b>	Public Meeting January 9, 2025 East Toledo Family Center
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	A total of 21 residents attended a community meeting at the East Toledo Family Center on January 9, 2025
	<b>Summary of comments received</b>	Attendees participated in several exercises to identify the highest priority needs in the community. These included Affordable Housing, Jobs and Economic Development, Programs for Children Youth and Teens, Home Repair Program, Workforce Development / Skills Training, Public Safety / Crime Prevention, and Street and Sidewalk

		Improvements. The information gathered from the community meeting was incorporated into the Needs Assessment and Market Analysis.
	<b>Summary of comments not accepted and reasons</b>	Not Applicable. All comments were accepted.
	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
<b>10</b>	<b>Mode of Outreach</b>	Public Meeting - Virtual January 23, 2025
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	A total of 16 residents attended a virtual community meeting on January 23, 2025
	<b>Summary of comments received</b>	Attendees participated in several exercises to identify the highest priority needs in the community. These included Affordable Housing, Workforce Development / Skills Training, Jobs and Economic Development, Home Repair Program, Programs for Children Youth and Teens, Mental Health Services, and Services for the Homeless. The information gathered from the community meeting was incorporated into the Needs Assessment and Market Analysis.
	<b>Summary of comments not accepted and reasons</b>	Not Applicable. All comments were accepted.
	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
<b>11</b>	<b>Mode of Outreach</b>	Third Party Partners Meeting Toledo Public Library March 27, 2025
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	Community Agency representatives attended a partners meeting at the Toledo Public Library on March 27, 2025.
	<b>Summary of comments received</b>	Attendees participated in several exercises to identify the highest priority needs in the community. These included Affordable Housing, Services for the Homeless, Mental Health Services, Programs for Children and Youth and Teens, and Home Repair Program. The information gathered from the meeting was incorporated into the Needs Assessment and Market Analysis.
	<b>Summary of comments not accepted and reasons</b>	Not Applicable. All comments were accepted.
	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
<b>12</b>	<b>Mode of Outreach</b>	Public Hearing One Government Center, City Council Chambers April 3, 2025
	<b>Target of Outreach</b>	Non-targeted/broad community



	<b>Summary of response/attendance</b>	There were a total of 8 community members present in-person. The meeting was also broadcast to an unknown number of viewers.
	<b>Summary of comments received</b>	One attendee offered a comment about how much he appreciated the information.
	<b>Summary of comments not accepted and reasons</b>	N/A
	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
13	<b>Mode of Outreach</b>	Public Hearing One Government Center, City Council Chambers April 24, 2025
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	There were a total of 12 community members present in-person. The meeting was also broadcast to an unknown number of viewers.
	<b>Summary of comments received</b>	No public comments were made during the meeting.
	<b>Summary of comments not accepted and reasons</b>	N/A
	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
14	<b>Mode of Outreach</b>	Public Hearing One Government Center, City Council Chambers May 1, 2025
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	There were a total of 17 community members present in-person. The meeting was also broadcast to an unknown number of viewers.
	<b>Summary of comments received</b>	<ul style="list-style-type: none"> <li>One public comment calls for a major shift in Toledo's housing strategy, criticizing current approaches as ineffective. He proposes adopting income-based, European-style housing models that tie rent to 30% of income, use modular homes on vacant land, and include solar energy to reduce costs. He also advocates for integrating housing with social services to better support residents during income disruptions.</li> <li>The second public comment were related to concerns that new housing is overly rental-focused, leading to transient communities and future blight, advocating for condos and affordable ownership to build community investment; opposition to subsidies for developers; supports investing directly in people; stresses the need for quality jobs tied to housing affordability; supports mass transit but views car ownership as key to mobility; support for infill redevelopment and modular homes for small households; and pairing housing for the homeless with employment and services.</li> </ul>

	<b>Summary of comments not accepted and reasons</b>	N/A
	<b>URL (If applicable)</b>	<a href="https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan">https://toledo.oh.gov/departments/housing-community-development/5-year-consolidated-plan</a>
15	<b>Mode of Outreach</b>	Public Hearing: Housing and Community Development Committee Meeting One Government Center, City Council Chambers July 10, 2025
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	There were approximately 29 community members present in-person. The meeting was also broadcast to an unknown number of viewers.
	<b>Summary of comments received</b>	<ul style="list-style-type: none"> <li>• Joe Balderas, Sofia Quintero Arts and Culture Center: Discussed the community garden program and the impact of delivering 3,000 pounds of fresh food for free to the community.</li> <li>• William Farnsell, CEO of Neighborworks: Discussed the agency and the work they perform in the community and asked for their funding not to be revoked, and the consequences to the agency and community services if their funding is eliminated.</li> <li>• Veronica Martinez, Managing Attorney with Legal Aid of Western Ohio (LAWO): Spoke about the services provided in the area and asked the council to accept the recommendation for funding LAWO.</li> <li>• David Johnson, Johnson Produce Market: They operate a fresh food market on Pulaski Street. They were denied funding for a second year and they wanted to discuss what assistance they can receive for an allocation of award for their project.</li> <li>• Noah Woods, Staff Attorney at Fair Housing Center: They expressed appreciation for the award and spoke about their work to prevent housing discrimination and assistance across the city.</li> <li>• Tracy Britt, Board Member of Neighborworks: Discussed the valuable work of the organization and made a request for funding of some amount rather than the complete elimination of their funding.</li> </ul>
	<b>Summary of comments not accepted and reasons</b>	N/A
	<b>URL (If applicable)</b>	<a href="https://toledo.granicus.com/player/clip/2122">https://toledo.granicus.com/player/clip/2122</a>
16	<b>Mode of Outreach</b>	Public Hearing: City Council Meeting One Government Center, City Council Chambers July 15, 2025
	<b>Target of Outreach</b>	Non-targeted/broad community
	<b>Summary of response/attendance</b>	There were approximately 22 community members present in-person. The meeting was also broadcast to an unknown number of viewers.

	<b>Summary of comments received</b>	No public comments were received related to the CDBG, HOME, or ESG programs.
	<b>Summary of comments not accepted and reasons</b>	N/A
	<b>URL (If applicable)</b>	<a href="https://toledo.granicus.com/player/clip/2124">https://toledo.granicus.com/player/clip/2124</a>

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

This section introduces and summarizes the key points of the Needs Assessment. These elements are described in more detail in the following sections of the Needs Assessment:

- Housing Needs Assessment
- Disproportionately Greater Need
- Public Housing
- Homeless Needs Assessment
- Non-Homeless Special Needs Assessment
- Non-Housing Community Development Needs

The Needs Assessment was informed utilizing various data sources and local and regional planning studies and compiled through consultation and community engagement with stakeholders throughout the City of Toledo, including government agencies, service providers, affordable housing developers, community partners, and residents. The Needs Assessment investigates the baseline, trends, and future housing supply and demand. Housing and services for special needs populations were also examined which included the elderly and frail elderly, homeless individuals and families, formerly incarcerated individuals, persons with HIV/AIDS, victims of domestic violence, youth aging out of the foster care system, veterans, persons with physical and cognitive disabilities, and persons with drug and/or alcohol addiction.

### Priority Needs

The following issues were identified through consultation (see PR-10), community meetings (see PR-15), and analysis of public data sources. The following is a summary of the key points in the Needs Assessment.

#### Housing Affordability

Toledo has experienced a population decline of 8% between 2010 and 2023. Over the same time period, the city saw a minor drop in the number of occupied housing units (1.6%) and a significant drop in the number of vacant units (25%). Despite population decline and stable housing supply, the available public data, information from community meetings and stakeholder interviews, and recent research all show that housing affordability and increasing cost burden is a significant and growing concern for Toledo residents. Nearly one-third of all households in Toledo are paying more than 30% of their income on housing (cost burdened or severely cost burdened). There is a need for affordable homeownership and affordable rental housing throughout the city.

## **Housing Rehabilitation**

There are many properties throughout the city that do not comply with Toledo's property maintenance code, either due to peeling paint, damaged foundations and porches, broken windows, missing or damaged siding and roofs, fire damaged houses, and unsecured buildings. Most of the housing stock in the city is older, with 83.5% being built before 1980. This older housing stock requires more rehabilitation and upkeep to maintain. Typically, after a home reaches 30 or 40 years old it begins to require significant repairs and/or major rehabilitation. This becomes even more problematic if the home wasn't well-maintained throughout. Further, homes in the midwestern United States suffer from additional weather-related problems due to icy weather, heavy snow, and frigid temperatures. Also, damage from more intense storms related to climate change is also creating more demand for home repairs.

## **Public Housing**

Lucas Metropolitan Housing (LMH) is the sole agency in the city tasked with the administration of public housing. Housing choice voucher holders are finding it increasingly more difficult to secure and remain in rental housing as rental prices keep increasing. Voucher holders can be priced out of the rental market because the voucher will not cover the full cost of rent. Anecdotally, landlords are becoming increasingly wary of leasing or accepting tenants who have a voucher. Despite outreach to landlords to rent to voucher holders having a voucher does not necessarily mean equal access to the housing market. In addition, landlords now request first and last months' rent and a security deposit. For income constrained communities these create additional hurdles to accessing housing even when they have a voucher.

## **Homelessness**

Estimating the total population of the unsheltered homeless presents a difficult challenge due to the transient nature of the homeless population in northwest Ohio. Further, estimating those who are at-risk of homelessness is equally challenging. In conversations with providers of homelessness services, through analysis of HMIS data and the Point-In-Time Count data and based on discussions with the Lucas County Homelessness Board, the total population of homeless individuals and families in the City of Toledo is currently estimated at approximately 1,258 individuals. Homelessness in Toledo is estimated to have increased another 10% from 2024 to 2025, reaching its highest level since the pandemic started in 2020.

## **Non-Homeless Special Needs Assessment:**

There are households throughout the city that have special needs unrelated to homelessness. Some of these population groups include the elderly and frail elderly; those living with some type of physical or cognitive disability; persons with substance use disorders; persons with mental illness; and victims of domestic violence, dating violence, sexual assault, and stalking.

### **Elderly and Frail Elderly**

Toledo's growing senior population faces urgent challenges with housing affordability, transportation, and healthcare access. With 38.6% of senior households living alone and many on fixed incomes, the rising cost of housing is creating significant housing cost burdens. Many seniors

lack reliable transportation leading to social isolation and reduced access to essential services. The elderly and frail elderly populations have additional unique challenges that come with age, including chronic and other medical conditions, higher rates of physical and mental disabilities (such as Alzheimer's and dementia), mobility challenges, and higher health care costs. A significant concern for the senior population is the eventual transition from independent living to assisted living and nursing home care.

#### Persons with Physical or Cognitive Disabilities

There is a large number of Toledo residents living with a disability, with 29,584 persons aged 18-64 living with a disability (18.1% of the total population), and another 38.4% of older individuals aged 65 with a disability. Residents that are physically or cognitively disabled have special housing needs to accommodate their specific conditions.

#### Persons Living with HIV/AIDS and their Families

The total number of persons living with HIV in Lucas County as of 2023 was 1,058. Individuals living with HIV/AIDS have specific housing needs and require stable housing to maintain a consistent medication regime.

#### Persons with Substance Use Disorders

Substance use disorders (SUDs) impact a significant portion of Toledo's population, reflecting broader statewide trends in Ohio. An estimated 11,500 Toledo residents aged 12 and older struggle with Alcohol Use Disorder, while approximately 8,100 experience Illicit Drug Use Disorder, and 3,150 suffer from Opioid Use Disorder.

#### Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

In 2023, the Toledo Police Department reported 1,691 domestic violence incidents that resulted in a charge, 247 that resulted in some other charge, and another 6,305 domestic violence incidents that did not result in any charge. The vast majority of these incidents involve victims who are women.

#### Young People Aging out of the Foster Care System

In 2024, approximately 90 young people exited the Foster Care System in the city of Toledo. Of the 90, 45 receive additional support and services through the Ohana project, a non profit agency that supports emancipated youth to remain eligible to participate in the BRIDGES program receiving dollars for housing, and case management services.

## **Non-Housing Community Development Needs**

### **Public Facilities**

The need for public facilities includes neighborhood community centers, senior centers, adequate healthcare centers, additional childcare facilities providing affordable afterschool programs and summer programs for children and teens, public parks, and recreation area improvements.

### **Public Infrastructure Improvements**

Like many post-industrial cities, Toledo has experienced deterioration of its aging road infrastructure, sidewalks, sewers, catch basins, buildings, and schools. The primary public infrastructure needs include street and traffic management to better support all users, including pedestrians, cyclists, and public transit riders, and automobile traffic; better pedestrian infrastructure; sewer and stormwater management; public transportation; and green infrastructure and environmental sustainability.

### **Public Services**

The primary public service needs are crime prevention; afterschool and summer recreation programs for youth and teens; mental health services; affordable childcare; programs or services for the elderly and frail elderly; adult education / workforce training classes; financial literacy programs; services for victims of domestic violence; healthcare services; programs and services for the homeless.

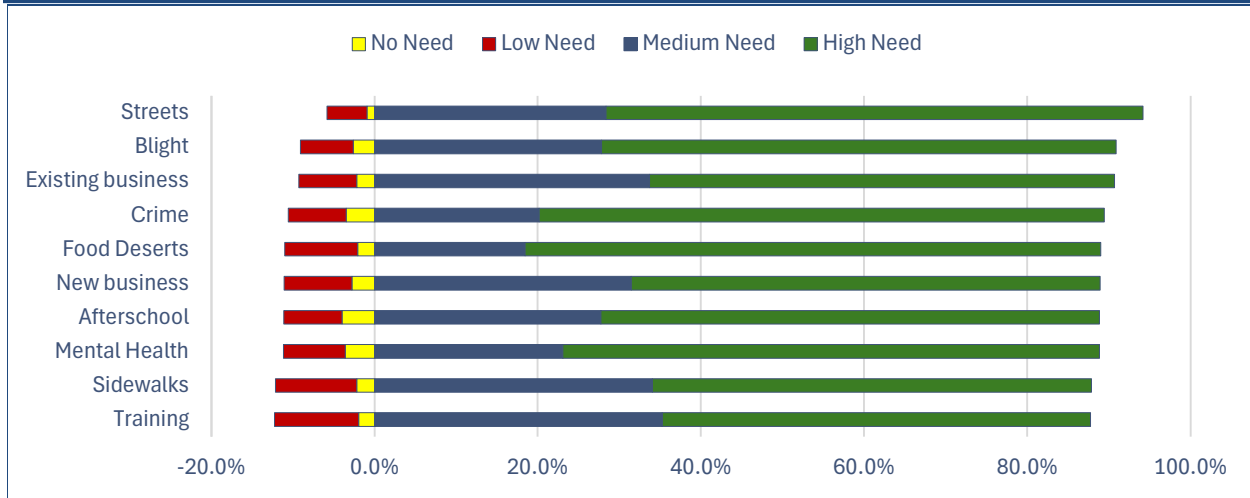
## **Community Survey Results**

As part of the City's citizen participation process, an online survey collected information from Toledo residents to supplement the data available from public sources and information collected from public service agencies, community service providers, and community meetings and focus groups. The online survey asked respondents to select the most important issues of concern or priority needs. There were 590 respondents to the online survey. The top ten needs were identified as follow:

- Street and road improvements
- Neighborhood blight
- Retention / expansion of existing businesses
- Crime prevention
- Access to Grocery Store / Healthy Food
- Attraction of new businesses
- Afterschool and summer recreation programs for youth and teens
- Mental health services / Services for persons with mental illness
- Sidewalk improvements
- Workforce training programs

These needs are further elaborated in the following sections.

**NA-05 Figure 1: Top 10 Housing and Community Development Needs**



	Definition	No Need	Low Need	Medium Need	High Need
<b>Streets</b>	Street and road improvements	0.9%	4.9%	28.4%	65.8%
<b>Blight</b>	Neighborhood blight	2.6%	6.5%	27.8%	63.1%
<b>Existing business</b>	Retention / expansion of existing businesses	2.2%	7.1%	33.7%	57.0%
<b>Crime</b>	Crime prevention	3.5%	7.1%	20.2%	69.2%
<b>Food Deserts</b>	Access to Grocery Store / Healthy Food	2.1%	8.9%	18.5%	70.5%
<b>New business</b>	Attraction of new businesses	2.8%	8.3%	31.5%	57.4%
<b>Afterschool</b>	Afterschool and summer recreation programs for youth and teens	4.0%	7.2%	27.7%	61.1%
<b>Mental Health</b>	Mental health services / Services for persons with mental illness	3.6%	7.6%	23.1%	65.8%
<b>Sidewalks</b>	Sidewalk improvements	2.2%	10.0%	34.1%	53.8%
<b>Training</b>	Workforce training programs	1.9%	10.3%	35.3%	52.5%

Data Source: CEW Advisors, Inc. Housing & Community Development Survey

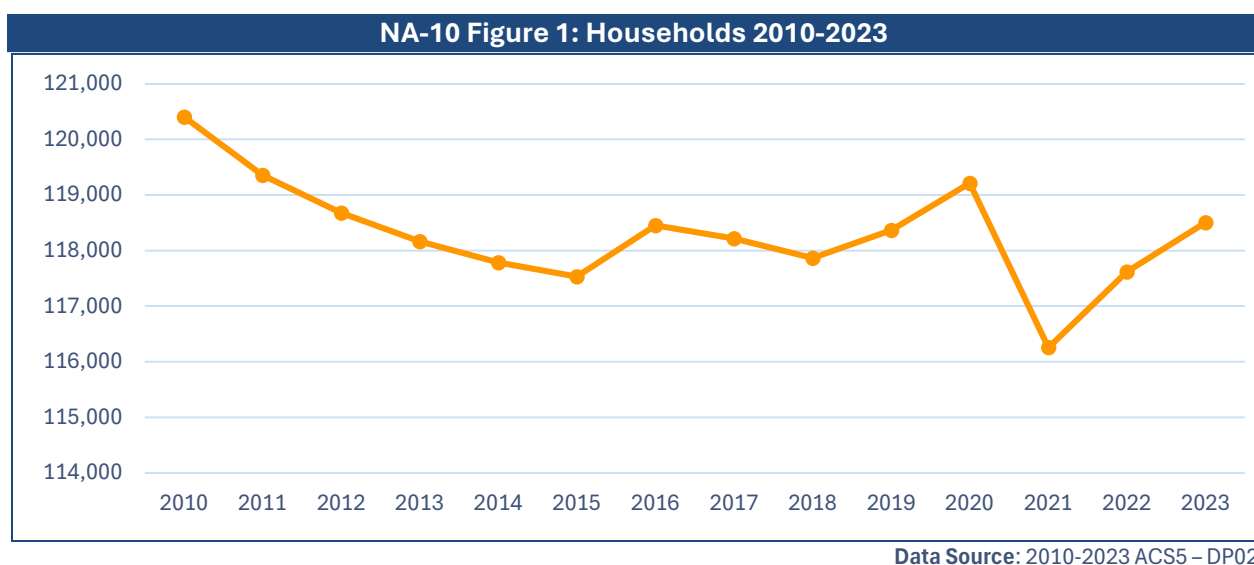


# NA-10 Housing Needs Assessment - 24 CFR

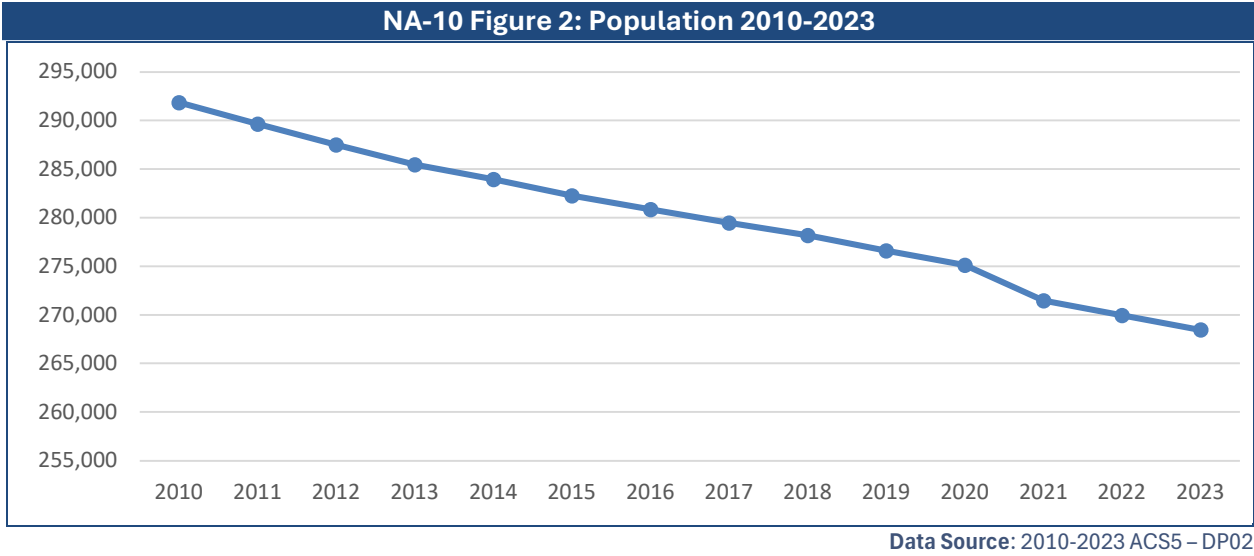
## 91.205 (a,b,c)

### Summary of Housing Needs

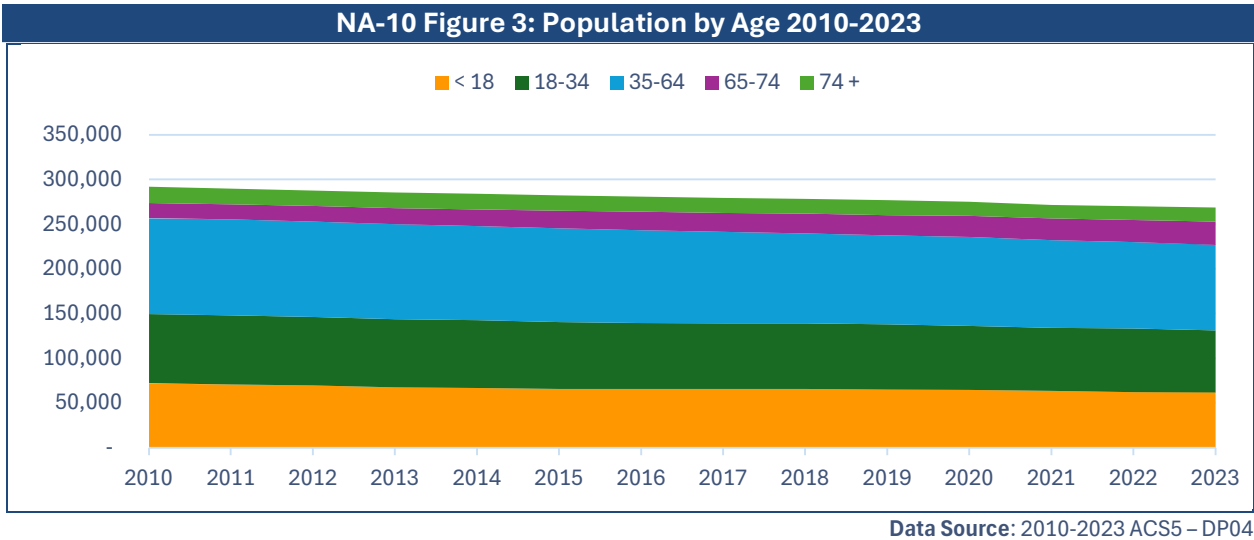
Stable, safe, and affordable homes are foundational to a healthy and resilient Toledo community where every resident has the opportunity to succeed and thrive. There are a total of 118,508 households in the City of Toledo, based on the 2023 American Community Survey 5-Year Estimate. The total number of households in Toledo has fluctuated over this time period. The city experienced a moderate decline in households from 2010 to 2018, with the exception of 2016. It then experienced a moderate rebound from 2018 through 2020. COVID saw a sharp drop in households followed by a fairly rapid rebound, bringing the city back to around the same number of households it had in 2016, but fewer households than 2010.



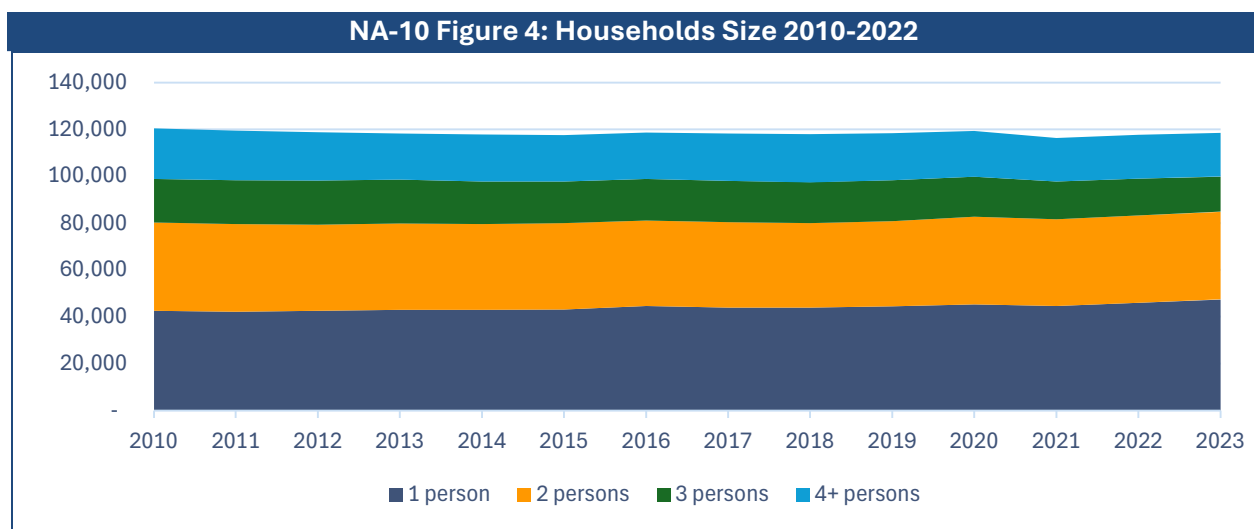
Population trends in Toledo show that the city has declined at a relatively constant rate of approximately 1,800 persons per year since 2010, shrinking by about 8% over the past 14 years. Toledo has experienced significant population decline for the past 50+ years. As of 2023, the city's population stood at 268,461. This is a continuation of decades of population decline from its population height of 383k in 1973.



While Toledo has seen overall population decline, the city has seen a 51.1% increase in the population aged 65 to 74 over the past 14 years. This is the only age group that has seen a population increase during this time period. The population of children under the age of 18 has declined 14.1%, from 71,932 in 2010 to 61,820 in 2023. Similarly, the traditional working age population aged 18 to 64 has declined 10.6% from 2010 to 2023, from 184,640 persons to 165,123 persons. This has an impact on the city’s school district as well as local employment opportunities. Further, as people live longer and healthier lives, the composition and needs of the housing market change. This increases the needs of people with a wider range of disabilities and housing preferences. These needs stem from the more typical age-related changes such as those relating to vision, hearing, mobility, and transportation, to those of mental health or acute physical or medical needs. It will grow increasingly important for the city to plan for and address this wider spectrum of housing needs for an aging population.

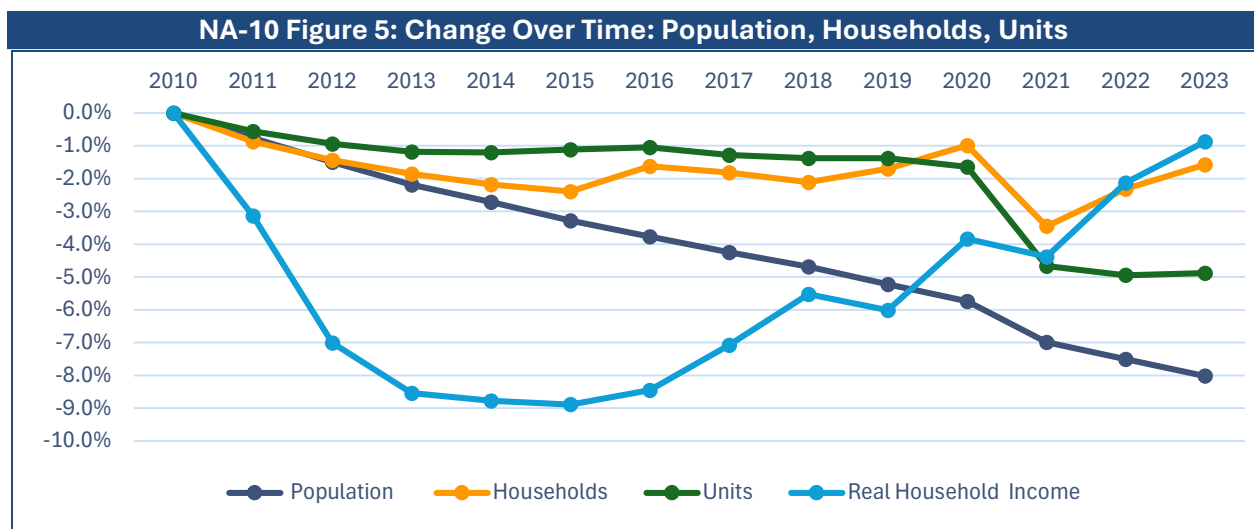


The predominance of one-person and two-person households in Toledo is significant. Over 70% of all households in Toledo are one- and two-person households. Three-person households comprise 12.7% of all households, while households with four or more individuals account for 15.7% of all households in the city. Further, one-person households are growing in Toledo, while larger households are declining. Single-person households saw 11.5% growth over the 2010-2023 period while the total population declined 8%. Two-person households held steady (0.6% decline). Conversely, three-person households saw a 19.5% percent decline during this period and four-person households saw a 13.4% decline. These trends correspond with larger demographic shifts seen in the city, state and nation, with people having fewer children and more seniors living alone.



Data Source: 2010-2023 ACS5 – S2501

While total population in Toledo saw an 8% decrease from 2010 to 2023, the total number of households saw a much smaller decrease of 1.6% during the same period. In 2010, the average household size was 2.37 persons, while in 2023 the average household declined to 2.21 persons.



Data Source: 2010-2022 ACS5 - DP02, DP04, DP05

This trend towards smaller households explains why the number of households was stable or increasing as the city experienced population decline. The change in household size also impacts the cost of housing. More households increase the demand for more housing, typically putting upward pressure on housing and rental costs. Additionally, the changing size of households in Toledo, with an increasing share of smaller households, changes the type of housing needed in the city, with an emphasis on smaller housing units that are better suited for smaller household sizes.

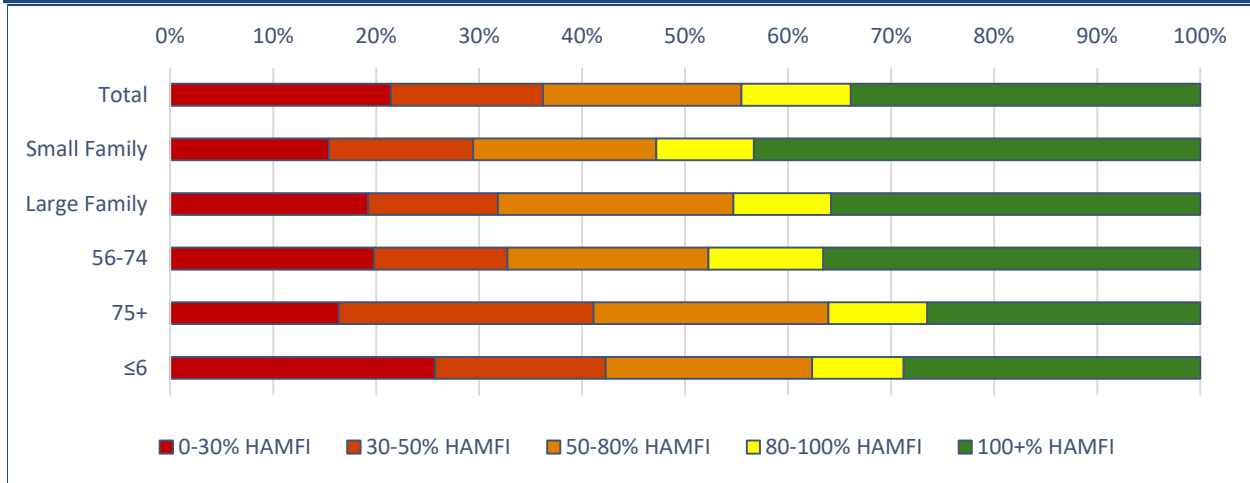
For the decade of the 2010s the number of units declined less than the number of households in Toledo. We would generally expect this to ease market pressures on rent and home prices. However, we also see that in the post-COVID years between 2021 and 2023, the number of households was growing, while the number of housing units has remained largely flat. These reflect national trends during this period, and similarly we see Toledo is not immune to the resulting affordable housing crisis.

Toledo saw its median household income change from \$34,260 in 2010 to \$47,532 in 2023. Importantly, the data reported from the American Community Survey is inflation adjusted for the report year. When the 2010 median household income is adjusted to 2023 dollars using the U.S. Bureau of Labor Statistics CPI Inflation Calculator, the CPI adjusted median household income is equivalent to \$47,948, about 1% more than the actual median household income in 2023. This represents a **decline** in real median household income of 0.9% over the 2010-2023 period while the cost of housing has increased dramatically. The greatly exacerbates the housing affordability crisis that is being felt in the city, particularly among the lowest-income households.

NA-10 Figure 6: Housing Needs Assessment Demographics			
	2010	2023	% Δ
Population	291,851	268,461	-8.0%
Households	120,406	118,508	-1.6%
Units	140,034	133,195	-4.9%
Nominal Median Household Income	\$34,260	\$47,532	38.7%
Median Household Income (2010 dollars)	\$34,260	\$33,963	-0.9%
Median Household Income (2022 dollars)	\$47,948	\$47,532	-0.9%

Data Source: 2010-2023 ACS5 - DP02, DP03, DP04, DP05. BLS CPI Calculator

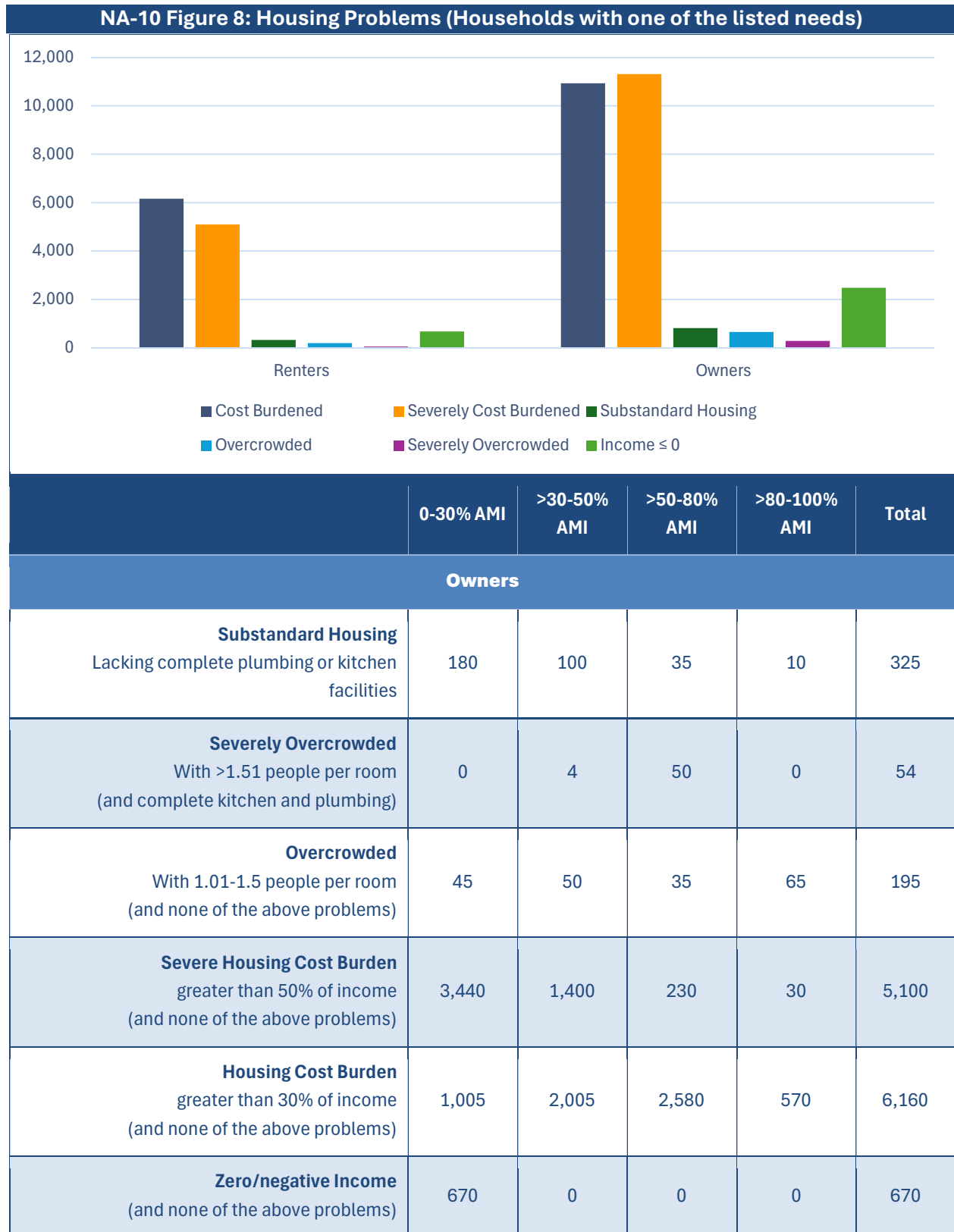
**NA-10 Figure 7: Total Households Table**



	0-30% HAMFI	30-50% HAMFI	50-80% HAMFI	80-100% HAMFI	100+% HAMFI
<b>Total Households</b>	24,920	17,155	22,400	12,340	39,445
<b>Small Family Households</b>	6,635	6,020	7,640	4,085	18,630
<b>Large Family Households</b>	1,320	865	1,570	650	2,460
<b>Household contains at least one person 62-74 years of age</b>	4,970	3,245	4,900	2,795	9,180
<b>Household contains at least one person age 75 or older</b>	1,830	2,760	2,550	1,070	2,960
<b>Households with one or more children 6 years old or younger</b>	4,290	2,755	3,340	1,480	4,800

Data Source: 2017-2021 CHAS - Tables 5, 7, 13

## Housing Needs Summary Tables

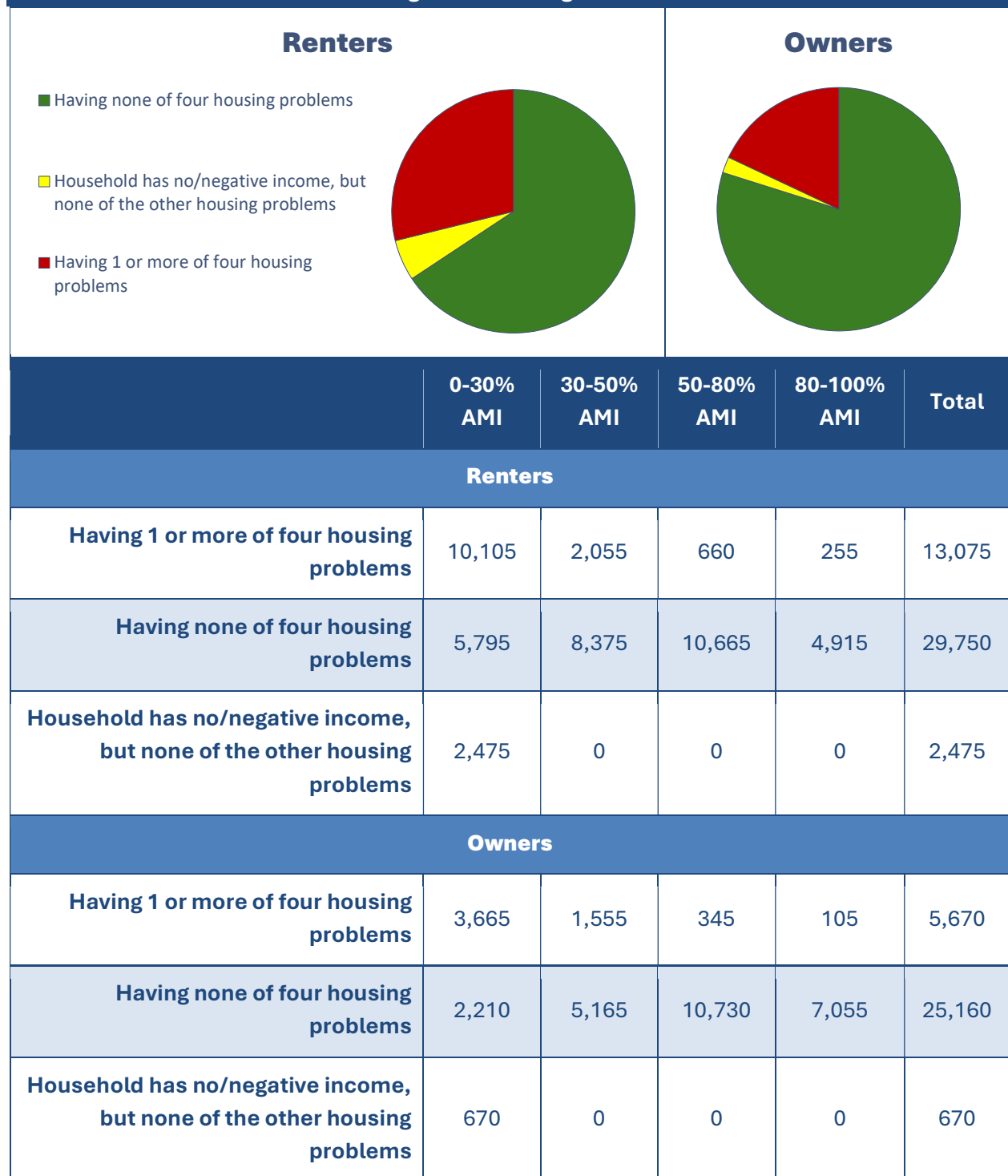


	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>Renters</b>					
<b>Substandard Housing</b> Lacking complete plumbing or kitchen facilities	460	130	120	105	815
<b>Severely Overcrowded</b> With >1.51 people per room (and complete kitchen and plumbing)	105	60	120	0	285
<b>Overcrowded</b> With 1.01-1.5 people per room (and none of the above problems)	235	220	115	85	655
<b>Severe Housing Cost Burden</b> greater than 50% of income (and none of the above problems)	9,300	1,645	305	65	11,315
<b>Housing Cost Burden</b> greater than 30% of income (and none of the above problems)	2,030	5,675	3,080	150	10,935
<b>Zero/negative Income</b> (and none of the above problems)	2,475	0	0	0	2,475

Data Source: 2017-2021 CHAS - Table 3

Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden.

NA-10 Figure 9: Housing Problems 2



Data Source: 2017-2021 CHAS - Tables 2, 3



NA-10 Figure 10: Cost Burden > 30%								
	< 30% AMI	30-50% AMI	50-80% AMI	Total	< 30% AMI	30-50% AMI	50-80% AMI	Total
	Renters				Owners			
Small family	1,325	1,250	3,230	12,390	220	770	2,175	18,850
Large family	160	120	545	1,705	115	105	625	3,055
Elderly family	95	240	255	1,275	170	520	1,805	9,180
Elderly non-family	850	440	730	3,140	515	1,330	2,030	7,835
Other	1,610	865	3,150	11,815	235	535	1,615	8,895
Total	4,040	2,915	7,910		1,255	3,260	8,250	

Data Source: 2017-2021 CHAS Table 7

NA-10 Figure 11: Cost Burden > 50%								
	< 30% AMI	30-50% AMI	50-80% AMI	Total	< 30% AMI	30-50% AMI	50-80% AMI	Total
	Renters				Owners			
Small family	365	2,430	1,315	4,190	100	520	870	1,830
Large family	125	420	95	640	10	75	280	385
Elderly family	40	210	100	350	160	185	335	815
Elderly non-family	495	715	485	1,720	440	820	450	1,835
Other	1,130	2,075	1,105	4,455	280	420	660	1,650
Total	2,155	5,850	3,100		990	2,020	2,595	

Data Source: 2017-2021 CHAS Table 7

NA-10 Figure 12: Crowding (More than one person per room)						
	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	100+% AMI	Total
Renters						
Single family households	280	275	135	65	200	955
Multiple, unrelated family households	40	30	55	20	55	200
Other, non-family households	25	0	45	0	25	95
Total need by income	340	305	235	85	280	1,245
Owners						
Single family households	35	54	30	4	115	238
Multiple, unrelated family households	10	0	54	65	125	254
Other, non-family households	0	0	0	0	0	0
Total need by income	45	54	85	65	240	489

Data Source: 2017-2021 CHAS - Table 10

NA-10 Figure 13: Crowding (Households With Children)								
	0-30% AMI	30-50% AMI	50-80% AMI	Total	0-30% AMI	30-50% AMI	50-80% AMI	Total
	Renters				Owners			
Lower Bound	0	0	0	0	0	0	0	0
Upper Bound	340	305	235	880	45	54	85	184

**Data Notes:** Toledo, like most jurisdictions, does not track crowding specifically for households with children. Using the data from CHAS Table 13 (Tenure by Year Structure Built by Household Income by Presence of Children), we can put an upper and lower bound on the possible number of overcrowded households with children by tenure and income level. We use the definition from CHAS Table 13 of children being aged six or younger. Unfortunately, as is often the case, these ranges are not very helpful – the minimum for each category is zero and the maximum is the known number of crowded households for each tenure/income category.

**Data Source:** 2017-2021 CHAS - Tables 10, 13

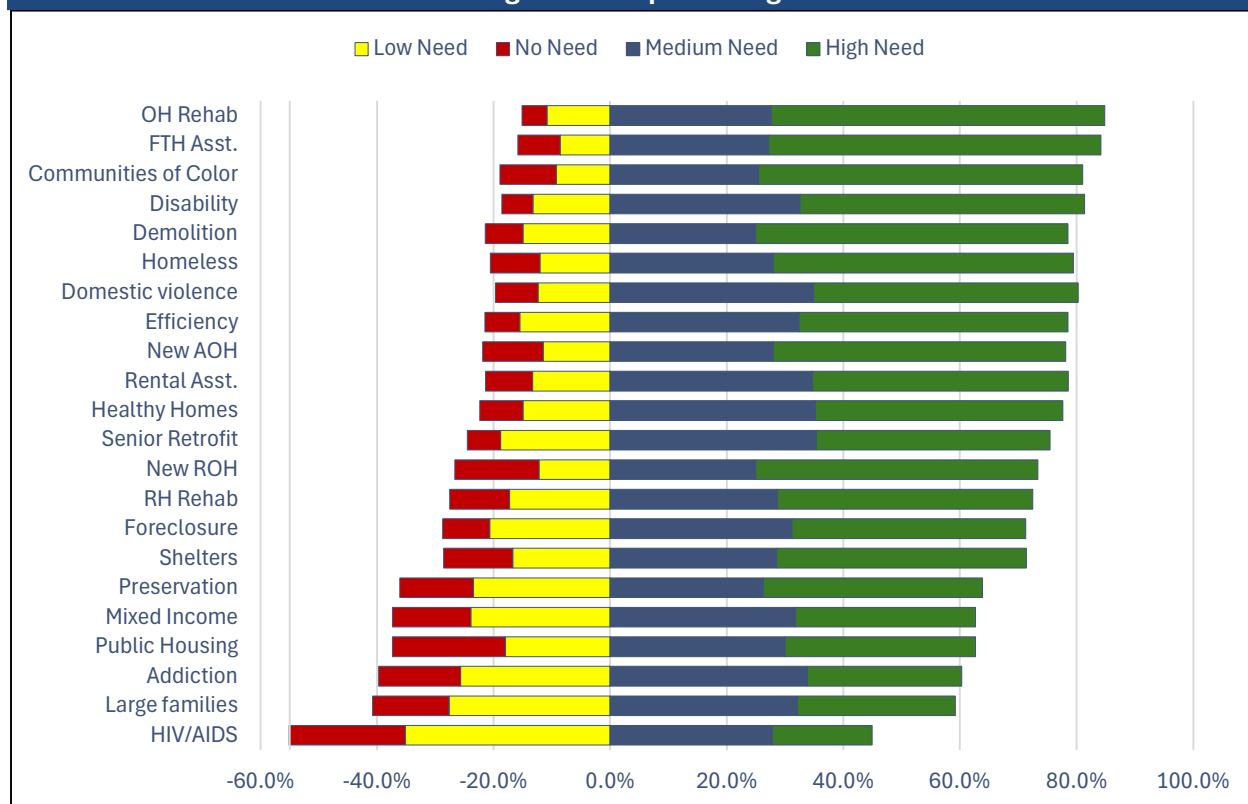
## Survey Results

CEW Advisors developed a Housing and Community Development survey and asked respondents to rank several housing needs on a four-point scale: no need, low need, medium need, or high need. A weighted total score was then calculated and used to rank the priority needs. The top five housing needs identified by survey respondents are:

- **Homeowner housing rehabilitation** was identified by 57.2% of respondents as a high need, 27.7% as a medium need, 10.8% of respondents as a low need, and 4.3% of respondents as not needed.
- **First-time homebuyer assistance** was identified by 57.0% of respondents as a high need, 27.2% as a medium need, 8.6% as a low need, and 7.3% as not needed.
- **Homeownership in communities of color** was identified by 55.6% of respondents as a high need, 25.5% as a medium need, 9.3% as a low need, and 9.7% as not needed.
- **Supportive housing for persons with a disability** was identified by 48.8% of respondents as a high need, 32.6% as a medium need, 13.3% as a low need, and 5.3% as not needed.
- **Demolition of dilapidated housing** was identified by 53.6% of respondents as a high need, 25.0% as a medium need, 15.0% as a low need, and 6.5% as not needed.

Other high priority housing needs include Supportive housing for the homeless; Supportive housing for victims of domestic violence; Energy efficiency upgrades; Construction of new affordable housing for sale, and Rental and utilities assistance.

NA-10 Figure 14: Top Housing Needs



	Definition	No Need	Low Need	Medium Need	High Need
<b>OH Rehab</b>	Homeowner housing rehabilitation	4.3%	10.8%	27.7%	57.2%
<b>FTH Asst.</b>	First-time homebuyer assistance	7.3%	8.6%	27.2%	57.0%
<b>Communities of Color</b>	Homeownership in communities of color	9.7%	9.3%	25.5%	55.6%
<b>Disability</b>	Supportive housing for persons with a disability	5.3%	13.3%	32.6%	48.8%
<b>Demolition</b>	Demolition of dilapidated housing	6.5%	15.0%	25.0%	53.6%
<b>Homeless</b>	Supportive housing for the homeless	8.5%	12.0%	28.0%	51.5%
<b>Domestic violence</b>	Supportive housing for victims of domestic violence	7.3%	12.4%	34.9%	45.4%
<b>Efficiency</b>	Energy efficiency upgrades	6.0%	15.5%	32.4%	46.1%
<b>New AOH</b>	Construction of new affordable housing for sale	10.4%	11.5%	28.0%	50.2%
<b>Rental Asst.</b>	Rental and utilities assistance	8.1%	13.3%	34.7%	43.9%
<b>Healthy Homes</b>	Programs to address home-based health issues (lead, radon, asbestos, etc.)	7.4%	15.0%	35.2%	42.4%
<b>Senior Retrofit</b>	Retrofit existing housing to meet seniors' needs	5.7%	18.8%	35.4%	40.1%
<b>New ROH</b>	Construction of new affordable housing for RENT	14.4%	12.2%	25.0%	48.4%
<b>RH Rehab</b>	Rental housing rehabilitation	10.2%	17.3%	28.7%	43.8%
<b>Foreclosure</b>	Foreclosure prevention	8.0%	20.7%	31.2%	40.0%
<b>Shelters</b>	Additional Homeless Shelters	11.9%	16.7%	28.6%	42.8%
<b>Preservation</b>	Historic Preservation	12.7%	23.4%	26.3%	37.6%

	Definition	No Need	Low Need	Medium Need	High Need
<b>Mixed Income</b>	Mixed-income housing	13.4%	23.9%	31.8%	30.8%
<b>Public Housing</b>	Increase in Public Housing	19.3%	18.0%	30.0%	32.7%
<b>Addiction</b>	Recovery housing for persons with alcohol or drug addiction	14.0%	25.7%	33.9%	26.5%
<b>Large families</b>	Housing designed for larger families (6 or more persons living together)	13.1%	27.6%	32.2%	27.1%
<b>HIV/AIDS</b>	Housing for persons living with HIV/AIDS and their families	19.9%	35.2%	27.8%	17.1%

**Data Source:** CEW Advisors, Inc. Housing & Community Development Survey

*Describe the number and type of single person households in need of housing assistance.*

Toledo has 45,964 single person households, including 15,137 senior single person households. According to the 2019-2023 ACS, the median rents for Toledo 0-, 1-, 2-, and 3-bedroom units were \$664, \$658, \$905, and \$1,089 respectively. Evaluating the data, we can see that this likely puts many single person households in the **cost burdened** or **severely cost burdened** categories depending on their age, sex, and size of rental unit. Single women aged 65 and older who are living alone have the lowest earnings, averaging \$25,889 annually, putting this group at the highest need for housing assistance and at the greatest risk of homelessness.

NA-10 Figure 15: Single-Person Household (Renter) Cost Burden						
	#	Earnings	0 Beds	1 Bed	2 Beds	3 Beds
Single Female (<65)	13,874	\$26,992	29.5%	29.3%	40.2%	48.4%
Single Female (65+)	9,477	\$25,889	30.8%	30.5%	41.9%	50.5%
Single Male (<65)	16,953	\$36,752	21.7%	21.5%	29.5%	35.6%
Single Male (65+)	5,660	\$31,317	25.4%	25.2%	34.7%	41.7%

Data Source: 2023 ACS5 - B19215, B25031, DP02

## Homelessness

According to the January 2024 Point in Time Count for the Lucas County Continuum of Care, there were 563 total homeless individuals, of which 342 were single individuals. Among them, 330 were sheltered and 12 were unsheltered. Throughout the 2024 calendar year, 3,395 people experienced homelessness, representing 2,438 total households, including over 1,900 single individuals.

## Foster Care

In Toledo, approximately 200 children age out of the foster care system each year. This means they turn 18 without being reunited with their families or being adopted. Aging out can present significant challenges as these young adults transition to independent living, often without the skills or income to stably maintain housing.

*Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.*

## Disabled Population

Toledo has 9,918 people with hearing difficulties, 7,727 people with vision difficulty, 20,319 people with cognitive difficulty, 21,537 people with ambulatory difficulty 7,829 people with self-care difficulty, and 15,029 with independent living difficulty. It is not possible to calculate with any accuracy how many disabled individuals require housing assistance; however, given the size of the population and the age and overall condition of the city's housing units, the need will be significant.

## Victims of Domestic Violence

Victims of domestic violence are a special needs population due to the unique challenges posed by intimate partner violence (IPV). Beyond physical and verbal abuse, financial abuse is a critical aspect of IPV with far-reaching consequences for survivors. Data aggregated by the Toledo Police Department shows there were 1,691 total Domestic Violence Incidents that resulted in a charge, and another 6,305 incidents that did not result in a charge. The city is collaborating with nonprofit organizations to address the issue of intimate partner violence. The YWCA Domestic Violence Shelter is the only emergency DV shelter in Lucas County, operating a 17-room, 46-bed facility for survivors. Due to overwhelming demand, the shelter regularly exceeds its intended capacity. To meet the urgent need for housing, the agency has resorted to renting hotel rooms at high costs to ensure victims—often accompanied by their children—have access to safe shelter.

These populations are discussed in more detail in **Section NA-45: Non-Homeless Special Needs Assessment**.

### *What are the most common housing problems?*

The most common housing problem is cost burden. The HUD Area Median Family Income (HAMFI) is the median family income calculated by HUD for each jurisdiction, so HUD can determine Fair Market Rents (FMRs) and income limits for HUD programs. Toledo is part of the Toledo, OH HUD Metro FMR Area. In the greater Toledo, OH HUD Metro FMR Area, the median household income is \$63,749, compared to \$47,532 for the city of Toledo, or approximately 75% of the area median income of the larger metro area.

HUD categorizes low-income households as follows:

- Extremely Low Income = 0% to 30% Area Median Income
- Very Low Income = >30% to 50% Area Median Income
- Low Income = >50% to 80% Area Median Income

Approximately 21.4% of all households are Extremely Low Income, either having no income or up to 30% HAMFI. Another 14.8% of all households are Very Low Income, earning between 30% and 50% of HAMFI. And another 19.3% of all households are Low Income, earning between 50% and 80% of HAMFI. In total, 55.5% of households in Toledo are low-income households. Among these low-income households, 31.4% (20,255 households) have at least one member that is aged 62 or older. Additionally, there are 10,385 low-income households with one or more children aged 6 or younger, representing 16.1% of all households.

The following housing problems are described below:

- Substandard Housing – Lacking complete plumbing or kitchen facilities
- Overcrowding – With 1.01 to 1.5 people per room
- Severe Overcrowding – With more than 1.51 people per room
- Cost Burden – Households spending more than 30% of income on housing

- Severe Cost Burden – Households spending more than 50% of income on housing

The most pronounced housing problems are Cost Burden and Severe Cost Burden. Housing cost burden and severe housing cost burden, defined as spending more than 30% or 50% of total household income on housing respectively, is the most significant housing problem in Toledo as with most other municipalities throughout Ohio. According to the Comprehensive Housing Affordability Strategy (CHAS) data, there are 23,055 renter households that pay more than 30% of their income on rent. Among them, 11,695 renter households spend more than 50% of their income on rent. For homeowners, there are 11,830 homeowners paying more than 30% of their income on their mortgages, with 5,260 households paying more than 50% of their income on housing.

Further, housing costs have increased dramatically in the past 5 years, exacerbating the affordability problem in Toledo. The median cost of a home has grown 33.9% between 2018 and 2023, from \$79,900 to \$107,000. The average rent for a 2-bedroom apartment has increased 28% during this period, from \$707 in 2018 to \$905 in 2023. The income needed to afford these housing costs is \$46,424 and \$36,200 respectively. Wage growth over the same time period was also 28% from \$37,100 to \$47,532. While cost burden has long been a problem for Toledo, some solace can be taken in the fact that for renters at least, it has not gotten worse in the past five years the way it has for much of the rest of the country.

The other housing problems are not of the same magnitude of concern for Toledo compared to housing cost. The total number of units that lack either complete plumbing or kitchen facilities is 1,140, or 1% of all units. There are a total of 1,189 units that are either overcrowded (between 1.01-1.5 people per room) or severely overcrowded (with more than 1.51 people per room), again about 1% of all units. While there is concern for the households in these situations, this is in stark contrast to the significant issue of Housing Cost Burden. The larger concern about the physical condition of Toledo's housing units, especially unoccupied units in the City, is discussed in more detail in **Section MA-20**.

<p><i>Are any populations/household types more affected than others by these problems?</i></p>
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Housing cost burden appears to disproportionately impact Elderly households – defined as households that have an older individual aged 62 or older as the Head of Household, Spouse, or Sole Member. There are 2,070 renter households and 2,650 owner households in the Elderly category that are Cost Burdened. Additionally, there are 2,465 Elderly renter households and 2,335 Elderly owner households are Severely Cost Burdened. In total, there are 9,520 Elderly Households that are paying more than 30% of their income on housing. This represents 30.8% of all households that have an older individual aged 62 or older. This is likely due to the fixed incomes of older individuals, and these cost burdened Elderly Households often find it challenging to afford rising housing costs associated with increasing rents, property taxes, home repairs, at-home care, transportation, and medical costs.

To reiterate, 30% of all the households in Toledo are cost burdened, with renter households being most likely to be cost burdened compared to owner-occupied housing. 41.2% of all renter



households are cost burdened compared to 19.6% of owner-occupied households. Of all the income levels within Toledo, households within the 0-30% AMI category have the highest percentage of households with one or more of four housing problems. Approximately 67.4% of all households in this income category have one or more housing problems. Housing cost burden is the most common housing problem, vastly surpassing every other housing problem combined. Importantly, the other housing problems discussed above (Substandard Housing, Overcrowding, and Severe Overcrowding) are concentrated almost exclusively among low- and moderate-income households.

*Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance*

According to the 2021 CHAS data, there are 64,475 low-income households in Toledo, out of a total of 118,508 households, about 55.5% of all households.

- 24,920 @ 0-30% AMI
- 17,155 @ >30-50% AMI
- 22,400 @ >50-80% AMI

Households with at least one person 75 or older, and households with children under 6 are more likely than average to be low-income. Low-income individuals and families living in Toledo often find it difficult to pay their housing costs, particularly due to the lack of affordable housing for the most economically vulnerable populations. Many of these low-income households are spending over 30% of their income on housing and have little savings which could be used in case of an emergency. There can often be instances when low-income families have a major home repair or auto repair need, medical emergency, or become unemployed. Without sufficient savings, a large financial shock can make them late on a rental or mortgage payment and begin the painful process of being evicted or being pushed into foreclosure.

Many individuals and families receiving rapid rehousing assistance are experiencing homelessness for the first time due to economic instability. Rising rental costs and stagnant wages contribute to the inability to maintain stable housing. There is a disproportionate representation of single, female-headed households of color within the homeless population. These families often face barriers in accessing appropriate shelter and services due to a lack of flexibility in family shelter programs. A significant portion of those facing housing instability include young adults aging out of foster care or juvenile justice systems. Many of these youth lack essential life skills, such as financial literacy, housing navigation, and employment readiness. The shelter system is overwhelmed, with long waitlists for family shelters. The availability of permanent supportive housing and move-in ready affordable rental units is extremely limited.

According to the 2023 ACS 5-Year Estimates, there are 61,820 children under 18 living in 31,345 households in Toledo. Among these households, 15,111 are married or cohabitating couple households with children, 1,566 are with an unmarried male head of household and 11,194 are unmarried female head of household. Additionally, there are 1,832 grandparents who are taking care of their grandchildren. 32,910 children are living in single-parent households. Children living in single-parent families are more likely to live in poverty than children living in two-parent families.

In Toledo, 9.2% of married-couple households with children live in poverty versus 44.4% poverty rate among single-parent Toledo households with children. Most single-parent families have only one potential wage earner<sup>1</sup>, compared with the two potential wage earners in two-parent families.

*If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:*

Not applicable.

*Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness*

The threat of homelessness is strongest among the households that are experiencing extreme cost burdens of 50% or more of their income. In Toledo, there are 16,415 households of all income categories that are extremely cost burdened, or 13.9% of all households in the city.

Other housing characteristics associated with instability and increased risk of homelessness include overcrowding and substandard housing units that lack complete plumbing or kitchen facilities. In Toledo there are 195 renter households that are overcrowded and another 54 renter households that are severely overcrowded. For homeowners, there are 655 households that are overcrowded and 285 households that are severely overcrowded. There are 325 renter units that lack complete plumbing and kitchen facilities and 815 such owner households.

Another related risk factor is a common phenomenon of “doubling up,” or temporarily living with friends or families due to housing cost burden or other situation (i.e., eviction, foreclosure, loss of employment, etc.). According to The State of Homelessness in America report for 2023, living doubled up is the most common living situation prior to becoming homeless. ACS data shows there are 24,476 persons in Toledo who are not the spouse, unmarried partner, or child of the

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<sup>1</sup> We note that in table B17010 from which the poverty by family type data is drawn, there is no data on “cohabitating couples.” Thus, it seems that the ACS in this case groups cohabitating couples into the “single householder, no spouse present” category. Therefore, we know that some “single parent” families in these data potentially have two incomes.

householder. These may be roommates, or parents/siblings of the householder, but some percentage of them may be people who are “doubled up.”

The age of the housing stock is another driver of housing cost burden affecting the stability of low-income homeowners and their risk of becoming homeless. 29.5% of the City’s housing was constructed prior to 1940 with about 7.3% constructed after 2000. The vast majority, 64.9% of the City’s housing units were built between 1940 and 1999. Older housing stock requires periodic maintenance and upkeep to ensure housing units are safe, warm, clean, and healthy. The cost of maintenance and rehabilitation has increased significantly over the past several years along with general housing costs. This places a significant burden on individual homeowners, especially for older adults who are on a fixed income and are increasingly less able to afford to maintain their homes themselves and require hiring others to do so.

Low-income renters, especially single-income households and those on fixed incomes, are at risk of becoming homeless and are also significantly more likely to have housing cost burdens over 50% of their income. Small interruptions of income, sudden emergencies such as unforeseen emergency car repair, and increased household expenses have significant consequences when these households lack the savings to bear the costs of these expenses.

Finally, there are several impacts related to rental and eviction policies. Evictions can remain on the record of the heads of household even if dismissed, making it difficult for individuals to secure new housing. Many landlords are unwilling to rent to formerly homeless individuals or those relying on subsidies due to concerns about stability, past evictions, or delayed payments from assistance programs. The funding of supportive services is limited and can further exacerbate instability as individuals exiting programs often lack the resources to navigate rental challenges.

## Discussion

The data presented above paints a clear picture of the city’s housing challenges; primary among them is the issue of affordability. The housing cost burden among the City’s low- to moderate-income residents creates significant difficulty for the households and for the city when cost burdens lead to homelessness. The lack of ongoing maintenance of some of the city’s housing stock in low- and moderate-income neighborhoods has created situations where units are of substandard quality, are unhealthy, and potentially unsafe for habitation.

While housing problems impact many different demographics in the city, low-income households and elderly households are two groups that both experience disproportionately high cost-burdens.

- 30% of Toledo households experience cost burdens greater than 30% percent of household income. Of those households that are extremely low income (0 – 30% of HAMFI), 65.8% have cost burdens that exceed thirty percent of their household income.
- There are a total of 9,520 Elderly households that are cost burdened, paying more than 30% of their income on housing. This represents 30.8% of all households that have at least one person aged 62 and older.

The very low-income and the elderly both may have difficulty overcoming excessive cost burdens due to the following:

- (1) very low-income households are unlikely to have income to spare on mobility opportunities like pursuing higher education due to the majority of their paycheck going towards basic necessities
- (2) elderly households are on a fixed income. Toledo's aging housing stock compounds this due to large maintenance costs

# NA-15 Disproportionately Greater Need: Housing Problems - 91.205 (b)(2)

*Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.*

## Introduction

A disproportionately greater need exists when the members of racial or ethnic group at any specific income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. For example, if 50% of all low-income households within Toledo have a housing problem and 60% of low-income Hispanic households have a housing problem, this would be considered an instance of disproportionately greater need. This section has four tables that capture the number of housing problems by income, race, and ethnicity. Each table provides data for a different income level (0–30%, 30–50%, 50–80%, and 80–100% AMI).

In Toledo, the total population and the total households are predominantly White; 80% of the population is White, while 83.6% of all the households have a White head of household.

NA-15 Figure 1: Demographics - Race				
	Households		Population	
	#	%	#	%
White	74,973	63.3%	157,515	58.7%
Black or African American	32,919	27.8%	77,036	28.7%
American Indian and Alaska Native	192	0.2%	458	0.2%
Asian	1,578	1.3%	3,645	1.4%
Native Hawaiian and Other Pacific Islander	30	0.0%	109	0.0%
Some Other Race	3,248	2.7%	8,425	3.1%
Two or More Races	5,568	4.7%	21,273	7.9%
Total	118,508	100%	268,461	100%

Data Source: 2019-2023 ACS - B25006, DP05

NA-15 Figure 2: Demographics - Ethnicity				
	Households		Population	
	#	%	#	%
Hispanic or Latino	8,169	6.9%	24,022	8.9%
White, Not Hispanic or Latino	72,201	60.9%	150,283	56.0%
Other Race, Not Hispanic or Latino	38,138	32.2%	94,156	35.1%
Total	118,508	100.0%	268,461	100.0%

Data Source: 2019-2023 ACS - B11001H, B11001I, DP05

Per HUD regulations, Toledo must provide an assessment for each disproportionately greater need identified. Although the purpose of these tables is to analyze the relative level of need for each racial and ethnic category, the data also provide information that can be useful in describing overall need. As discussed above, housing problems are defined as having one of the following four living conditions:

- Lacking complete plumbing (including hot and cold running water, a flush toilet, and a bathtub or shower)
- Lacking complete kitchen facilities (including a kitchen sink; a cooking stove, built-in burners, or a microwave oven; and a refrigerator)
- Overcrowding with more than 1.01 persons per room (not including bathrooms, porches, foyers, halls, or half-rooms)
- Cost burden of spending more than 30% of household income on housing

NA-15 Figure 3: Housing Cost Burden by Tenure						
	Owners		Renters		Total	
	#	%	#	%	#	%
Cost Burden <=30%	47,814	79.2%	30,330	54.2%	78,144	67.2%
Cost Burden >30% to <=50%	6,565	10.9%	11,355	20.3%	17,920	15.4%
Cost Burden >50%	5,260	8.7%	11,700	20.9%	16,960	14.6%
Cost Burden not available	698	1.2%	2,525	4.5%	3,223	2.8%
Total	60,337	100.0%	55,910	100.0%	116,247	100.0%

Data Source: 2017-2021 CHAS Table 9

To reiterate, 30% of all the households in Toledo are cost burdened, with renter households being most likely to be cost burdened compared to owner-occupied housing. 41.2% of all renter households are cost burdened compared to 19.6% of owner-occupied households.

NA-15 Figure 4: Disproportionally Greater Need - Housing Problems (0 - 30% AMI)							
	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total
	#	%	#	%	#	%	#
<b>Jurisdiction as a whole</b>	16,805	67.4%	4,892	19.6%	3,223	12.9%	24,920
<b>White</b>	7,685	73.6%	1,500	14.4%	1,250	12.0%	10,435
<b>Black / African American</b>	7,315	63.5%	2,675	23.2%	1,535	13.3%	11,525
<b>Asian</b>	245	58.5%	40	9.5%	134	32.0%	419
<b>American Indian, Alaska Native</b>	14	100.0%	0	0.0%	0	0.0%	14
<b>Pacific Islander</b>	0	n/a	0	n/a	0	n/a	0
<b>Hispanic</b>	1,050	62.5%	460	27.4%	170	10.1%	1,680

**Data Notes:** The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**Data Source:** 2017-2021 CHAS - Tables 1, 9

Of all the income levels within Toledo, households within the 0-30% AMI category have the highest percentage of households with one or more of four housing problems. Approximately 67.4% of all households in this income category have one or more housing problems. As discussed in the previous section, housing cost burden is the most common housing problem, vastly surpassing every other housing problem combined. In each of these sections, when discussing housing problems, housing cost burden is the primary challenge.

As shown in the table above, when considering race, 73.6% of White households in the 0-30% AMI income group have one or more of four housing problems and 63.5% of Black/African American households in the 0-30% AMI income group have one or more of four housing problems. 58.5% of Asian households in the 0-30% AMI income group have one or more of four housing problems.

100% of American Indian or Alaska Native households in the 0-30% AMI income group have one or more of four housing problems. There are no Pacific Islander households in the 0-30% income range.

When considering ethnicity and this income category, 62.5% of Hispanic households have one or more of four housing problems.

Compared to the City as a whole, American Indian and Alaska Native households earning 0-30% AMI have a disproportionate need for assistance. However, we note the extremely small sample size (14 households) of American Indian and Alaska Native households.

NA-15 Figure 5: Disproportionally Greater Need - Housing Problems (30 - 50% AMI)							
	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total
	#	%	#	%	#	%	#
<b>Jurisdiction as a whole</b>	11,290	65.8%	5,865	34.2%	0	0.0%	17,155
<b>White</b>	6,145	62.8%	3,640	37.2%	0	0.0%	9,785
<b>Black / African American</b>	3,510	66.5%	1,770	33.5%	0	0.0%	5,280
<b>Asian</b>	140	75.7%	45	24.3%	0	0.0%	185
<b>American Indian, Alaska Native</b>	25	71.4%	10	28.6%	0	0.0%	35
<b>Pacific Islander</b>	15	78.9%	4	21.1%	0	0.0%	19
<b>Hispanic</b>	965	74.2%	335	25.8%	0	0.0%	1,300

**Data Notes:** The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**Data Source:** 2017-2021 CHAS - Tables 1, 9

Of all the income levels within Toledo, households within the 30-50% AMI category have the second-highest percentage of households with one or more of four housing problems. 65.8% of all households in this income category have one or more housing problems. As discussed in the previous section, housing cost burden is the most common housing problem, vastly surpassing



every other housing problem combined. In each of these sections, when discussing housing problems, housing cost burden is the primary challenge.

Within this income group, Pacific Islander households have a disproportionate need for assistance. However, we note the extremely small sample size of these households. However, we note the extremely small sample size (15 households) of Pacific Islander households. Further, we note that Asian households are one tenth of one percentage point away from meeting the definition for disproportionate greater need.

NA-15 Figure 6: Disproportionally Greater Need - Housing Problems (50 - 80% AMI)							
	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total
	#	%	#	%	#	%	#
<b>Jurisdiction as a whole</b>	6,670	29.8%	15,730	70.2%	0	0.0%	22,400
<b>White</b>	3,620	27.3%	9,650	72.7%	0	0.0%	13,270
<b>Black / African American</b>	2,140	31.3%	4,705	68.7%	0	0.0%	6,845
<b>Asian</b>	80	28.6%	200	71.4%	0	0.0%	280
<b>American Indian, Alaska Native</b>	0	0.0%	24	100.0%	0	0.0%	24
<b>Pacific Islander</b>	0	n/a	0	n/a	0	n/a	0
<b>Hispanic</b>	635	43.5%	825	56.5%	0	0.0%	1,460

**Data Notes:** The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**Data Source:** 2017-2021 CHAS - Tables 1, 9

Among all households within the 50-80% AMI category, approximately 29.8% have one or more housing problems. As discussed in the previous section, housing cost burden is the most common housing problem, vastly surpassing every other housing problem combined. In each of these sections, when discussing housing problems, housing cost burden is the primary challenge.

As shown in the table above, when considering race, 27.3% of White households in this income group have one or more of four housing problems, 31.3% of Black/African American households

and 28.6% of Asian households in this income group have one or more of four housing problems. When considering ethnicity and this income category, 43.5% of Hispanic households have one or more of four housing problems.

Within this income group, Hispanic households have a disproportionate need for assistance.

NA-15 Figure 7: Disproportionally Greater Need - Housing Problems (80 - 100% AMI)							
	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total
	#	%	#	%	#	%	#
<b>Jurisdiction as a whole</b>	1,090	8.8%	11,250	91.2%	0	0.0%	12,340
<b>White</b>	735	8.5%	7,875	91.5%	0	0.0%	8,610
<b>Black / African American</b>	235	8.9%	2,395	91.1%	0	0.0%	2,630
<b>Asian</b>	0	0.0%	70	100.0%	0	0.0%	70
<b>American Indian, Alaska Native</b>	15	100.0%	0	0.0%	0	0.0%	15
<b>Pacific Islander</b>	0	n/a	0	n/a	0	n/a	0
<b>Hispanic</b>	105	11.4%	815	88.6%	0	0.0%	920

**Data Notes:** The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**Data Source:** 2017-2021 CHAS - Tables 1, 9

Unsurprisingly, the 80-100% AMI income group has the lowest percentage of households with one or more of four housing problems. 8.8% of all households in this income category have one or more housing problems.

Within this income group, American Indian and Alaska Native households earning have a disproportionate need for assistance. However, we again note the extremely small sample size of these households.

## Discussion

Reviewing all the information above, the following are instances of disproportionate greater need.

- Among extremely low-income households earning less than 30% of area median income, American Indian and Alaska Native households have a higher likelihood of experiencing one or more housing problem.
- Among very low-income households earning between 30% and 50% of area median income, Pacific Islander households have a higher likelihood of experiencing one or more housing problem.
- Among low-income households earning between 50% and 80% of area median income, Hispanic households have a higher likelihood of experiencing one or more housing problem.
- Among moderate income households earning between 80% and 100% of area median income, Native American and Alaska Native households have a higher likelihood of experiencing one or more housing problem.

It is important to note that for each of these instances of disproportionate need, the overall number of households in these categories is extremely small.

# NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.205 (b)(2)

*Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.*

## Introduction

A disproportionately greater need exists when the members of racial or ethnic group at any specific income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. For example, if 50% of all low-income households within Toledo have a housing problem and 60% of low-income Hispanic households have a housing problem, this would be considered an instance of disproportionately greater need. This section has four tables that capture the number of severe housing problems by income, race, and ethnicity. Each table provides data for a different income level (0–30%, 30–50%, 50–80%, and 80–100% AMI). As discussed above, severe housing problems are defined as having one of the following four living conditions:

- Lacking complete plumbing (including hot and cold running water, a flush toilet, and a bathtub or shower)
- Lacking complete kitchen facilities (including a kitchen sink; a cooking stove, built-in burners, or a microwave oven; and a refrigerator)
- Severe Overcrowding with more than 1.5 persons per room (not including bathrooms, porches, foyers, halls, or half-rooms)
- Severe Cost Burden of spending more than 50% of household income on housing

**NA-20 Figure 1: Disproportionally Greater Need - Severe Housing Problems (0 - 30% AMI)**

	Has one or more of four severe housing problems		Has none of the four severe housing problems		Household has no/negative income, but none of the other severe housing problems		Total
	#	%	#	%	#	%	#
<b>Jurisdiction as a whole</b>	13,770	55.3%	7,927	31.8%	3,223	12.9%	24,920
<b>White</b>	6,195	59.4%	2,990	28.7%	1,250	12.0%	10,435
<b>Black / African American</b>	6,135	53.3%	3,850	33.4%	1,535	13.3%	11,520

	Has one or more of four severe housing problems		Has none of the four severe housing problems		Household has no/negative income, but none of the other severe housing problems		Total
<b>Asian</b>	180	42.5%	110	25.9%	134	<b>31.6%</b>	424
<b>American Indian, Alaska Native</b>	10	55.6%	8	44.4%	0	0.0%	18
<b>Pacific Islander</b>	0	n/a	0	n/a	0	n/a	0
<b>Hispanic</b>	825	49.1%	685	40.8%	170	10.1%	1,680

**Data Notes:** The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%.

**Data Source:** 2017-2021 CHAS - Tables 2, 9

Of all the income levels within Toledo, households within the 0-30% AMI category have the highest percentage of households with one or more of four severe housing problems. 55.3% of all households in this income category have one or more severe housing problems. As discussed in the previous section, housing cost burden is the most common housing problem, vastly surpassing every other housing problem combined. In each of these sections, when discussing housing problems, housing cost burden is the primary challenge.

As shown in the table above, when considering race, 59.4% of White households in the 0-30% AMI income group have one or more of four severe housing problems and 53.3% of Black/African American households in the 0-30% AMI income group have one or more of four severe housing problems. 42.5% of Asian households in the 0-30% AMI income group have one or more of four severe housing problems. 55.6% of American Indian or Alaska Native households in the 0-30% AMI income group have one or more of four severe housing problems. There are no Pacific Islander households in the 0-30% AMI income category. 49.1% of Hispanic households have one or more of four housing problems.

Compared to the City as a whole, Asian households earning 0-30% AMI have a higher likelihood of having zero or negative income but none of the other housing problems.

**NA-20 Figure 2: Disproportionally Greater Need - Severe Housing Problems (30 - 50% AMI)**

	Has one or more of four severe housing problems		Has none of the four severe housing problems		Household has no/negative income, but none of the other severe housing problems		Total
	#	%	#	%	#	%	#
<b>Jurisdiction as a whole</b>	3,610	21.0%	13,540	79.0%	0	0.0%	17,150
<b>White</b>	2,030	20.7%	7,760	79.3%	0	0.0%	9,790
<b>Black / African American</b>	1,105	20.9%	4,175	79.1%	0	0.0%	5,280
<b>Asian</b>	55	28.9%	135	71.1%	0	0.0%	190
<b>American Indian, Alaska Native</b>	15	42.9%	20	57.1%	0	0.0%	35
<b>Pacific Islander</b>	15	78.9%	4	21.1%	0	0.0%	19
<b>Hispanic</b>	290	22.1%	1,020	77.9%	0	0.0%	1,310

**Data Notes:** The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%.

**Data Source:** 2017-2021 CHAS - Tables 2, 9

Of all the income levels within Toledo, households within the 30-50% AMI category have the second-highest percentage of households with one or more of four severe housing problems. 21% of all households in this income category have one or more severe housing problems. As discussed in the previous section, housing cost burden is the most common housing problem, vastly surpassing every other housing problem combined. In each of these sections, when discussing housing problems, housing cost burden is the primary challenge.

As shown in the table above, when considering race, 20.7% of White households in the 30-50% AMI income group have one or more of four severe housing problems and 20.9% of Black/African American households in the 0-30% AMI income group have one or more of four severe housing problems. 28.9% of Black/African American households in the 0-30% AMI income group have one or more of four severe housing problems. 42.9% of American Indian or Alaska Native households in the 30-50% AMI income group and 78.9% of Pacific Islander households in the 30-50% AMI income group have one or more of the severe housing problems. When considering ethnicity and this income category, 22.1% of Hispanic households have one or more of four housing problems.

In the 30-50% AMI income category, American Indian, Alaska Native and Pacific Islander households have a disproportionate need for assistance.

NA-20 Figure 3: Disproportionally Greater Need - Severe Housing Problems (50 - 80% AMI)							
	Has one or more of four severe housing problems		Has none of the four severe housing problems		Household has no/negative income, but none of the other severe housing problems		Total
	#	%	#	%	#	%	#
<b>Jurisdiction as a whole</b>	1,005	4.5%	21,395	95.5%	0	0.0%	22,400
<b>White</b>	420	3.2%	12,845	96.8%	0	0.0%	13,265
<b>Black / African American</b>	375	5.5%	6,470	94.5%	0	0.0%	6,845
<b>Asian</b>	15	5.4%	265	94.6%	0	0.0%	280
<b>American Indian, Alaska Native</b>	0	0.0%	24	100.0%	0	0.0%	24
<b>Pacific Islander</b>	0	n/a	0	n/a	0	n/a	0
<b>Hispanic</b>	105	7.2%	1,355	92.8%	0	0.0%	1,460

**Data Notes:** The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%.

**Data Source:** 2017-2021 CHAS - Tables 2, 9

Approximately 4.5% of all households in the 50-80% AMI income category have one or more severe housing problems. As shown in the table above, when considering race, 3.2% of White households in this income group have one or more of four severe housing problems, 5.5% of Black/African American households in this income group have one or more of four severe housing problems, and 5.4% of Asian households in this income group have one or more severe housing problems. There are no American Indian or Alaska Native households in this income group that have severe housing problems, and there are no Pacific Island households in this income group according to the available data. 7.2% of Hispanic households in this income group have one or more of four severe housing problems.

Within this income group, there are no instances of disproportionate greater need among any racial or ethnic group based on the available data.

NA-20 Figure 4: Disproportionally Greater Need - Severe Housing Problems (80 - 100% AMI)							
	Has one or more of four severe housing problems		Has none of the four severe housing problems		Household has no/negative income, but none of the other severe housing problems		Total
	#	%	#	%	#	%	#
<b>Jurisdiction as a whole</b>	360	2.9%	11,970	97.1%	0	0.0%	12,330
<b>White</b>	265	3.1%	8,345	96.9%	0	0.0%	8,610
<b>Black / African American</b>	80	3.0%	2,550	97.0%	0	0.0%	2,630
<b>Asian</b>	0	0.0%	70	100.0%	0	0.0%	70
<b>American Indian, Alaska Native</b>	0	0.0%	15	100.0%	0	0.0%	15
<b>Pacific Islander</b>	0	n/a	0	n/a	0	n/a	0
<b>Hispanic</b>	24	2.6%	895	97.4%	0	0.0%	919

**Data Notes:** The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%.

**Data Source:** 2017-2021 CHAS - Tables 2, 9

Similar to the previous section, the 80-100% AMI income group has the lowest percentage of households with one or more of four severe housing problems. 2.9% of all households in this income category have one or more severe housing problems. Within this income group, there are no instances of disproportionate greater need among any racial or ethnic group based on the available data.

## Discussion

Reviewing all the information above, the following are instances of disproportionate greater need.

- Among extremely low-income households earning less than 30% of area median income, Asian households have a higher likelihood of having zero or negative income but none of the other housing problems.



- Among very low-income households earning between 30% and 50% of area median income American Indian, Alaska Native, and Pacific Islander households have a higher likelihood of experiencing one or more severe housing problem. However, these sample sizes are quite small.

# NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.205 (b)(2)

*Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.*

## Introduction

A disproportionately greater need exists when the members of racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. In this section, the analysis is specifically on the housing cost burden.

NA-25 Figure 1: Disproportionately Greater Need - Housing Cost Burden								
	No Cost Burden <=30% of Income on Housing		Cost Burden of 30-50% of Income on Housing		Severe Cost Burden of >50% of Income on Housing		No / negative income (not computed)	
	#	%	#	%	#	%	#	%
<b>Jurisdiction as a whole</b>	78,144	67.2%	17,920	15.4%	16,960	14.6%	3,223	2.8%
<b>White</b>	52,810	73.5%	9,755	13.6%	8,075	11.2%	1,250	1.7%
<b>Black or African American</b>	18,450	<b>56.4%</b>	5,685	17.4%	7,030	21.5%	1,535	4.7%
<b>Asian</b>	715	<b>54.6%</b>	230	17.6%	230	17.6%	134	10.2%
<b>American Indian or Alaska Native</b>	85	58.6%	35	24.1%	25	17.2%	0	0.0%
<b>Pacific Islander</b>	14	<b>48.3%</b>	0	0.0%	15	<b>51.7%</b>	0	0.0%
<b>Hispanic</b>	4,610	61.9%	1,615	21.7%	1,050	14.1%	170	2.3%
<b>Multiracial or Other</b>	1,460	<b>53.5%</b>	600	22.0%	535	19.6%	134	4.9%

Data Source: 2017-2021 CHAS - Table 9

## Discussion

Using HUD's definition, no racial or ethnic group in Toledo is disproportionately more likely to spend more than 30% but no more than 50% of its monthly income on housing.

Pacific Islander households in Toledo are disproportionately more likely to spend more than 50% of their monthly income on housing.

Black, Asian, Pacific Islander, and Multiracial/Other households in Toledo are disproportionately less likely to spend 30% of their monthly income or less on housing.

In sum, the data highlights that 30% (34,880) of all households in Toledo suffer from a housing cost burden and reinforces the ongoing discussion that cost burden is the most significant housing problem in Toledo.

# NA-30 Disproportionately Greater Need:

## Discussion - 91.205(b)(2)

*Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?*

As previously discussed, a disproportionately greater need exists when the members of racial or ethnic group at any specific income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Based on the available data discussed above, there are a few instances of racial or ethnic groups that have a disproportionately greater need. These include the following noted in NA-15, NA-20, and NA-25:

### Housing Problems

- Among extremely low-income households earning less than 30% of area median income, Asian households have a higher likelihood of having zero or negative income but none of the other housing problems.
- Among low-income households earning between 50% and 80% of area median income, Hispanic households have a higher likelihood of experiencing one or more housing problem.
- Among extremely low-income households earning less than 30% of area median income, and also among moderate income households earning between 80% and 100% of area median income, Native American and Alaska Native. households have a higher likelihood of experiencing one or more housing problem. However, for both of these income groups the overall number of households in these categories are extremely small.
- Among very low-income households earning between 30% and 50% of area median income, Pacific Islander households have a higher likelihood of experiencing one or more housing problem. However, for both of these income groups the overall number of households in these categories are extremely small.

### Severe Housing Problems

- Among extremely low-income households earning less than 30% of area median income, Asian households have a higher likelihood of having zero or negative income but none of the other housing problems.
- Among very low-income households earning between 30% and 50% of area median income American Indian, Alaska Native, and Pacific Islander households have a higher likelihood of experiencing one or more severe housing problem. However, these sample sizes are quite small.

### Cost Burden

- Pacific Islander households in Toledo are disproportionately more likely to spend more than 50% of their monthly income on housing.

- Black, Asian, Pacific Islander, and Multiracial/Other households in Toledo are disproportionately less likely to spend 30% of their monthly income or less on housing.
- In sum, the data highlights that 30% (34,880) of all households in Toledo suffer from a housing cost burden and reinforces the ongoing discussion that cost burden is the most significant housing problem in Toledo.

*If they have needs not identified above, what are those needs?*

N/A

*Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?*

Below we list the 124 census tracts either wholly or partially in Toledo. For each tract we list the total number of households and the percentage of race and ethnicity. Using the HUD definition of disproportionate as being 10 percentage points or more than the average for the city as a whole, we highlight the tracts where a certain group is disproportionately **over-** or **under-** represented.

There is a good deal of fluctuation in both the Black and White populations based on geography. These fluctuations are mostly complementary, with one population being overrepresented in census tracts where the other is underrepresented. Fully two thirds of the census tracts in the city fit this complementary Black/White over/under-representation dynamic. This shows that Toledo is still a largely de facto segregated city.

No other racial or ethnic group makes up more than 10% of the households in the city, so by the HUD definition they cannot be disproportionately underrepresented. There are a handful of tracts where Hispanic/Latino households are overrepresented, as well as households with a householder who identifies as multi-racial or other. Interestingly, these three groups are often overrepresented in the same areas (see tracts 39095000460 – 39095000540 for example). In these census tracts, we often see the number of Black households underrepresented but the number of White households **not** overrepresented.

There is only one census tract (39095007501) where Asian households are overrepresented. There are no census tracts where American Indian, Alaska Native, Native Hawaiian, or Pacific Islander, households are overrepresented.

NA-30 Figure 1: Race and Ethnicity by Census Tract									
	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total Households
Toledo	63.3%	27.8%	0.2%	1.3%	0.0%	2.7%	4.7%	6.9%	118,508
39095000201	71.7%	24.2%	0.0%	0.7%	0.0%	0.0%	3.4%	4.1%	873
39095000202	73.6%	18.2%	0.1%	0.0%	0.0%	0.0%	8.0%	2.4%	696

	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095000301	55.0%	38.0%	0.0%	0.0%	0.0%	0.0%	7.0%	7.4%	1,128
39095000302	83.7%	7.3%	0.0%	0.0%	0.0%	1.3%	7.7%	3.8%	1,011
39095000400	60.8%	32.1%	0.0%	0.0%	0.0%	0.8%	6.2%	6.5%	1,438
39095000601	58.7%	28.3%	0.0%	1.7%	0.0%	0.5%	10.9%	8.7%	1,501
39095000602	57.0%	42.6%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	284
39095000701	66.8%	22.4%	0.0%	0.0%	0.0%	0.0%	10.8%	0.0%	575
39095000702	72.5%	20.0%	0.0%	0.0%	0.0%	0.0%	7.5%	7.5%	835
39095000703	66.0%	32.7%	0.0%	1.3%	0.0%	0.0%	0.0%	0.0%	385
39095000800	16.6%	73.1%	0.0%	0.0%	0.0%	1.3%	9.0%	3.6%	614
39095000900	40.6%	39.6%	0.0%	0.0%	0.0%	9.7%	10.1%	12.8%	833
39095001001	31.9%	53.1%	0.0%	0.0%	0.0%	11.3%	3.7%	11.3%	621
39095001002	39.8%	52.4%	0.0%	1.8%	0.0%	1.5%	4.5%	7.6%	949
39095001100	35.0%	53.9%	0.3%	3.3%	0.0%	5.7%	1.8%	16.7%	906
39095001201	79.4%	13.7%	0.0%	0.0%	0.0%	4.8%	2.1%	8.2%	767
39095001202	35.3%	56.2%	0.0%	0.0%	0.0%	0.5%	8.1%	5.5%	853
39095001301	88.0%	8.4%	0.0%	0.6%	0.0%	0.0%	2.9%	1.7%	1,128
39095001302	68.3%	26.1%	0.0%	3.5%	0.0%	0.0%	2.0%	12.4%	1,129
39095001303	47.8%	39.0%	0.0%	0.0%	0.0%	1.5%	11.7%	4.0%	1,438
39095001400	14.4%	82.8%	0.7%	0.9%	0.0%	0.0%	1.2%	0.0%	682
39095001500	12.2%	85.6%	0.0%	0.0%	0.0%	1.1%	1.1%	1.1%	542
39095001601	24.6%	71.7%	0.0%	0.0%	0.0%	3.5%	0.2%	3.7%	565
39095001602	67.6%	30.2%	0.0%	0.0%	0.0%	2.2%	0.0%	2.2%	583
39095001700	33.7%	54.6%	0.0%	0.0%	0.0%	11.8%	0.0%	4.6%	416
39095001800	46.7%	44.1%	0.0%	2.3%	0.0%	0.0%	6.8%	3.8%	863

	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total Households
39095001900	18.9%	73.1%	0.0%	0.0%	0.0%	4.1%	3.9%	1.9%	700
39095002000	70.7%	22.4%	1.2%	0.0%	0.0%	4.4%	1.4%	19.0%	501
39095002100	62.6%	31.1%	0.0%	0.0%	0.0%	4.3%	2.0%	11.3%	1,266
39095002401	53.0%	40.7%	1.1%	2.8%	0.0%	0.0%	2.4%	7.1%	1,440
39095002402	12.5%	87.5%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%	489
39095002500	0.0%	90.0%	0.0%	2.2%	0.0%	1.2%	6.6%	0.0%	743
39095002600	4.7%	82.8%	0.0%	4.2%	0.0%	0.0%	8.4%	2.7%	406
39095002700	37.4%	52.5%	2.8%	0.0%	0.0%	4.8%	2.5%	9.7%	709
39095002800	50.8%	35.0%	0.0%	0.0%	0.0%	4.9%	9.2%	5.3%	714
39095002900	42.1%	52.7%	0.0%	0.0%	0.0%	0.0%	5.2%	5.5%	1,044
39095003000	58.6%	28.8%	0.9%	0.0%	0.0%	1.1%	10.5%	8.7%	873
39095003100	14.5%	84.4%	0.0%	0.0%	0.0%	0.0%	1.1%	0.0%	449
39095003200	3.4%	96.4%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	468
39095003300	0.0%	98.3%	0.0%	0.0%	0.0%	0.0%	1.7%	0.0%	532
39095003500	5.2%	92.7%	0.0%	0.0%	0.0%	0.0%	2.2%	0.0%	368
39095003600	8.2%	82.9%	0.0%	3.2%	0.0%	0.0%	5.7%	0.0%	474
39095003901	77.7%	18.3%	0.0%	0.0%	0.0%	0.0%	4.0%	3.2%	1,343
39095003902	67.2%	25.0%	0.0%	0.0%	0.0%	0.0%	7.8%	12.1%	819
39095004000	48.4%	49.0%	0.0%	0.0%	0.0%	1.4%	1.2%	7.0%	690
39095004200	44.3%	12.9%	0.0%	2.0%	2.4%	31.9%	6.6%	40.4%	700
39095004401	62.4%	25.3%	0.0%	0.0%	0.0%	10.7%	1.6%	6.6%	439
39095004402	41.2%	53.8%	1.8%	0.0%	0.0%	2.7%	0.5%	4.5%	820
39095004501	91.0%	3.6%	0.0%	1.7%	0.0%	1.3%	2.4%	4.6%	1,185
39095004503	81.1%	8.9%	0.0%	0.0%	0.9%	2.5%	6.6%	11.1%	1,284

	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095004504	91.3%	3.2%	0.0%	0.8%	0.0%	1.3%	3.4%	3.0%	1,421
39095004600	72.8%	0.9%	0.0%	3.6%	0.0%	14.3%	8.5%	22.0%	800
39095004701	56.6%	31.1%	0.0%	0.7%	0.0%	7.2%	4.3%	7.2%	1,079
39095004702	68.7%	11.0%	0.0%	0.0%	0.0%	9.8%	10.5%	25.8%	1,363
39095004800	59.2%	15.8%	0.0%	0.0%	0.0%	9.5%	15.4%	21.2%	1,136
39095004900	65.5%	14.6%	0.0%	0.0%	0.0%	4.4%	15.5%	14.6%	1,132
39095005000	75.9%	14.9%	0.0%	0.0%	0.0%	5.3%	3.9%	8.8%	693
39095005101	57.2%	31.6%	0.0%	3.6%	0.0%	3.0%	4.6%	8.4%	1,183
39095005102	62.4%	6.2%	0.0%	1.1%	0.0%	21.7%	8.6%	39.5%	534
39095005200	58.0%	11.1%	0.0%	0.0%	0.0%	21.7%	9.2%	29.1%	1,240
39095005300	63.0%	8.7%	0.4%	0.0%	0.0%	12.8%	15.2%	14.3%	705
39095005400	51.7%	20.0%	0.0%	0.0%	0.0%	12.2%	16.1%	27.5%	894
39095005501	93.1%	3.0%	0.3%	0.0%	0.0%	0.0%	3.5%	0.6%	1,268
39095005502	90.3%	0.5%	0.0%	0.0%	0.0%	4.0%	5.2%	8.1%	1,512
39095005503	89.8%	8.8%	0.0%	0.0%	0.0%	0.0%	1.3%	3.3%	904
39095005601	96.0%	1.3%	0.0%	0.0%	0.0%	2.0%	0.7%	2.0%	2,056
39095005602	97.3%	2.7%	0.0%	0.0%	0.0%	0.0%	0.0%	4.7%	403
39095005701	76.2%	12.7%	0.0%	0.2%	0.0%	3.4%	7.6%	8.9%	1,389
39095005703	72.7%	13.5%	0.0%	0.0%	0.0%	2.8%	11.0%	8.7%	1,081
39095005704	84.4%	9.8%	0.0%	0.1%	0.0%	4.1%	1.6%	8.8%	1,068
39095005705	67.9%	24.0%	0.0%	0.0%	0.0%	0.0%	8.2%	9.1%	1,002
39095005801	75.5%	18.0%	0.0%	0.1%	0.0%	4.3%	2.1%	8.7%	1,752
39095005803	88.1%	4.1%	0.0%	0.0%	0.0%	3.9%	3.9%	3.9%	747
39095005804	69.6%	26.1%	0.0%	0.0%	0.0%	2.8%	1.5%	7.1%	1,350



	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095005901	96.9%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%	1.4%	1,052
39095005902	83.4%	6.7%	0.0%	3.1%	0.0%	1.0%	5.7%	4.8%	1,844
39095006000	89.3%	8.1%	0.0%	1.2%	0.0%	0.0%	1.5%	4.7%	1,026
39095006100	98.3%	0.0%	0.0%	0.0%	0.0%	0.0%	1.7%	2.7%	1,299
39095006200	79.3%	14.2%	0.0%	2.6%	0.0%	0.0%	3.9%	3.7%	1,067
39095006300	78.0%	17.7%	0.0%	0.0%	0.0%	0.0%	4.3%	1.6%	1,371
39095006400	88.8%	5.9%	0.0%	1.9%	0.0%	0.0%	3.4%	1.8%	1,138
39095006500	44.9%	45.1%	0.0%	3.5%	0.0%	2.1%	4.3%	3.5%	1,369
39095006600	30.6%	59.9%	0.4%	0.0%	0.0%	1.7%	7.4%	3.9%	955
39095006700	50.3%	27.2%	0.0%	7.7%	0.0%	5.9%	8.9%	10.2%	875
39095006801	50.4%	46.0%	0.0%	1.3%	0.0%	0.0%	2.3%	12.8%	1,551
39095006802	39.3%	49.0%	0.3%	9.3%	0.0%	1.4%	0.7%	0.0%	1,469
39095006900	85.3%	12.1%	0.0%	0.0%	0.0%	0.9%	1.7%	0.9%	1,264
39095007002	96.7%	0.0%	0.0%	0.0%	0.0%	2.0%	1.4%	4.2%	814
39095007202	82.0%	13.6%	0.0%	0.5%	0.0%	1.2%	2.7%	5.2%	1,618
39095007204	59.1%	32.2%	1.7%	2.4%	0.0%	3.2%	1.4%	7.6%	2,426
39095007206	86.8%	10.0%	0.0%	0.0%	0.0%	3.1%	0.0%	1.6%	707
39095007207	85.2%	8.2%	0.0%	0.6%	0.0%	3.3%	2.6%	3.1%	1,084
39095007208	61.3%	35.1%	0.0%	2.1%	0.0%	0.0%	1.5%	0.0%	1,377
39095007209	37.6%	59.3%	0.0%	0.0%	0.0%	1.0%	2.1%	4.6%	1,155
39095007302	45.4%	48.1%	0.6%	3.8%	0.0%	0.0%	2.1%	3.1%	1,404
39095007304	55.4%	27.2%	0.0%	9.8%	0.0%	7.1%	0.6%	8.5%	1,267
39095007305	83.7%	9.3%	0.0%	0.0%	0.6%	1.6%	4.8%	3.0%	979
39095007306	45.6%	50.0%	1.4%	0.6%	0.0%	1.2%	1.1%	2.7%	1,879

	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095007307	52.1%	42.6%	0.0%	0.0%	0.0%	0.0%	5.3%	3.9%	760
39095007401	42.7%	41.7%	0.4%	11.3%	0.0%	2.9%	1.0%	2.6%	1,310
39095007402	36.1%	54.4%	0.0%	1.8%	0.0%	0.0%	7.7%	2.0%	1,475
39095007501	40.4%	39.1%	0.0%	16.0%	0.0%	3.4%	1.1%	3.4%	1,012
39095007502	62.1%	32.5%	0.0%	0.6%	0.0%	0.0%	4.9%	1.2%	899
39095007700	88.5%	3.9%	0.0%	1.2%	0.0%	4.5%	1.9%	7.6%	1,521
39095007801	98.1%	0.0%	0.5%	1.0%	0.0%	0.5%	0.0%	4.3%	887
39095007802	83.9%	14.7%	0.0%	0.0%	0.0%	0.0%	1.3%	2.4%	990
39095007901	90.0%	2.0%	0.0%	1.6%	0.0%	1.0%	5.5%	4.7%	837
39095007903	94.2%	4.3%	0.0%	0.0%	0.0%	1.0%	0.5%	1.0%	1,230
39095007904	84.2%	5.8%	0.0%	0.0%	0.0%	0.0%	10.1%	4.6%	1,243
39095008000	88.1%	2.5%	0.5%	4.4%	0.0%	0.0%	4.5%	1.5%	1,693
39095008302	93.0%	5.9%	0.0%	0.0%	0.0%	0.0%	1.1%	1.1%	757
39095008303	81.5%	6.3%	0.0%	3.8%	0.0%	1.6%	6.7%	15.7%	1,397
39095008304	81.2%	2.0%	0.0%	6.6%	0.0%	0.0%	10.2%	0.3%	1,429
39095008401	61.6%	21.3%	0.3%	1.7%	0.0%	0.0%	15.2%	3.3%	1,444
39095008501	75.9%	22.9%	0.1%	0.0%	0.0%	0.0%	1.2%	0.0%	1,256
39095008502	76.0%	8.0%	0.9%	0.6%	0.0%	1.1%	13.5%	3.8%	817
39095008601	72.8%	17.0%	0.0%	0.0%	0.0%	0.0%	10.2%	2.0%	1,076
39095008602	80.4%	15.4%	0.0%	0.0%	0.0%	3.2%	1.0%	2.4%	1,231
39095009902	92.6%	0.0%	0.0%	0.0%	0.0%	6.0%	1.4%	1.4%	420
39095010200	68.9%	25.3%	0.0%	1.1%	0.0%	2.6%	2.1%	11.1%	1,515
39095010300	64.6%	19.6%	0.0%	0.0%	0.0%	9.8%	5.9%	27.3%	560
39095010400	93.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7.0%	4.8%	187

	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095010500	15.4%	78.7%	0.0%	2.2%	0.0%	0.0%	3.8%	4.3%	1,246
39095010600	39.3%	52.4%	0.0%	3.1%	0.0%	0.0%	5.1%	9.5%	1,088

Data Source: 2019-2023 ACS – B11001I, B25006

# NA-35 Public Housing – 91.205(b)

## Introduction

Lucas Metropolitan Housing (LMH) owns, manages, and maintains 2,592 units of public housing in and around the city of Toledo. The housing developments owned and operated by LMH are located across the city and take a variety of forms, from low-rise and scattered site developments to high-rise buildings. The developments tend to be older, with some properties dating back to the 1930s. As such, their physical condition varies.

LMH also administers 4,494 Housing Choice Vouchers (HCVs). The current utilization of LMH's vouchers is 3,927 as of October 2024, resulting in a leasing percentage of 87.4%. Unfortunately, LMH is unable to distribute these unused HCVs due to the agency reaching its budget authority cap. This happens when private market rents increase and the housing authority needs to increase its allocation amount to support the continued residency of housing choice voucher holders.

Among these vouchers, 275 are Non-Elderly Disabled Vouchers (of a total of 300), and 42 are Family Unification Program Vouchers (of a total of 46). There are 504 vouchers for disabled residents and 170 VASH vouchers used to support affordable housing for Veterans. The total budgetary authority for 2024 was \$29,292,045.

There are not enough affordable housing options in the City of Toledo and often families and households that receive new vouchers are unable to find housing in the city. Several variables play a role in a family's success, but lack of quality affordable housing units that are in a physical condition allowing them to pass inspection continues to be a leading barrier preventing individuals and families from utilizing their voucher and leasing up.

NA-35 Figure 1: Public Housing by Program Type									
	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units / vouchers in use	0	0	2,592	4,494	540	3,954	170	46	504

**Data Notes:** \*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Data Source:** PIC (PIH Information Center)

+NA-35 Figure 2: Characteristics of Public Housing Residents by Program Type								
Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	6,627	8,245	9,664	8,587	9,628	9,779	6,417
Average length of stay	0	4	6	6	1	6	0	2
Average Household size	0	1	2	2	1	2	1	3
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	3	535	379	60	308	3	0
# of Disabled Families	0	25	851	1,370	105	1,045	19	2
# of Families requesting accessibility features	0	41	2,756	3,987	177	3,503	43	28
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Data Source: PIC (PIH Information Center)

NA-35 Figure 3: Race of Public Housing Residents by Program Type									
Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	24	794	1,321	101	1,096	17	13	70
Black/African American	0	16	1,929	2,632	75	2,377	26	15	95
Asian	0	0	23	9	1	7	0	0	0
American Indian/Alaska Native	0	1	7	24	0	22	0	0	2
Pacific Islander	0	0	3	1	0	1	0	0	0

Program Type									
Other	0	0	0	0	0	0	0	0	0

**Data Notes:** \*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Data Source:** PIC (PIH Information Center)

NA-35 Figure 4: Ethnicity of Public Housing Residents by Program Type									
Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	1	151	250	7	228	2	0	8
Not Hispanic	0	40	2,605	3,737	170	3,275	41	28	159

**Data Notes:** \*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Data Source:** PIC (PIH Information Center)

*Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:*

The demand for affordable housing in Toledo is strong. Based on the limited availability of high-quality affordable housing options, waiting times for public housing can be significant. The Annual Public Housing Authority Plan for LMH tracks the waitlists for public housing developments and for Housing Choice Vouchers.

LMH serves a large number of individuals with disabilities, with 45% of public housing applicants identifying themselves as having a disability. In the Housing Choice Voucher Program, 4.86% of applicants have a disability. There is a long waiting list for accessible units, with limited turnover, making it difficult for those in need to secure housing quickly.

LMH continues to provide housing dedicated to the needs of the elderly by maintaining the designation of certain public housing properties through the Designated Housing Plan for the Elderly with HUD. This plan was approved in 2018 and has been extended through 2025. In June of 2023, LMH submitted a two-year extension request to HUD proposing to designate 320 units as “elderly only,” representing 12% of LMH’s total public housing inventory. HUD approved this extension on August 25, 2023. There are a total of 320 Elderly units in the public housing inventory according to the 2025 LMH Annual Plan.

*Most immediate needs of residents of Public Housing and Housing Choice voucher holders*

There is a high demand for affordable housing with very long waiting lists. The Public Housing waitlist closed since October 2023, with 1,539 families waiting for housing units. Approximately 300 families annually turnover on the waitlist on average. Due to the number of families currently on the waitlist, the HCV waitlist has been closed since 2019, limiting access to assistance for

additional housing units in the private rental market due to the significant demand that currently exists.

There is limited supply of accessible units for disabled residents and seniors needing housing accommodations. Most accessibility issues are related to mobility. For LMH public housing tenants, the housing authority addresses those in place when possible and then transfers those residents to accessible units when they become available. Aging in place is important for the elderly population in Toledo, those occupying Public Housing developments or other Section 8 or market rate units. Beyond any physical modifications to their housing units, elderly residents' primary needs are related to medical care, transportation, and activities for socialization.

The HCV payment standards were adjusted to 120% FMR (Fair Market Rent) to increase affordability, but many voucher holders still struggle to find landlords accepting vouchers or find a unit that passes the home inspection.

Rent burden remains high, especially for extremely low-income families (earning 0-30% AMI), and eviction risks due to non-payment and insufficient rental assistance programs are significant.

There are additional repairs and maintenance needs in Public Housing. The aging housing stock requiring significant renovations, including HVAC, plumbing, roofing, and electrical system upgrades.

There is a high unemployment rate among Public Housing residents and limited workforce development and financial literacy programs for low-income households. There are also affordable childcare needs and after-school programs to support working parents. Breaking the cycle of poverty with financial stability is a need for many public housing families. For Housing Choice Voucher holders, the Family Self-Sufficiency program assists households to increase income and assets, working with the family to end their dependence on welfare assistance and rental subsidies.

In recent years, utility costs have placed an increased financial burden on the current Section 8 households, even though Section 8 voucher holders are provided with subsidized utility allowances and payments each month. The rising cost of utilities is a very common complaint among this population. Food insecurity is another major concern among public housing residents and holders of HCVs. The majority of residents in the elderly and disabled housing units fall within the 0-30% AMI income category and do not have much additional income to absorb rising housing, utility, food and other household item expenses.

#### *How do these needs compare to the housing needs of the population at large*

The needs of public housing tenants are fairly similar to those of the greater population, particularly those of the same income level, age, and disability status. The primary needs for low-income families are affordable housing, opportunities to earn more income through higher-wage jobs, and a myriad of services required to help support those that are living in or near poverty such as food assistance, affordable childcare, transportation options, financial literacy, and educational and

workforce development programs for higher quality jobs. The housing and service needs of existing public housing residents are similar to the elderly and disabled population throughout the city, particularly home renovations and accommodations that will allow for continued residency for individuals in need of mobility accessibility.

#### *Discussion*

There is an urgent need for additional affordable housing for the many families and individuals on the public housing and Section 8 waiting list. Modifications to existing units are required to accommodate the elderly population and those living with a physical disability. Services to address the education, economic, and healthcare needs of youth and adults, and the mobility and healthcare need of the elderly and disabled populations in public housing are required. LMH continues to implement capital improvements and is accelerating activities to repair and upgrade existing sites to improve living conditions for its public housing residents.

LMH currently has more than 200 scattered site units in its portfolio spread across Lucas County. The management, operations, and rehabilitation of these scattered sites can be extremely inefficient and not very cost effective. In addition, these scattered sites have significant and costly rehabilitation needs. LMH is evaluating disposal of a large portion of these sites to generate funds for redevelopment activities and to eliminate holding costs.



# NA-40 Homeless Needs Assessment – 91.205(c)

## Introduction

HMIS data from the Lucas County Continuum of Care shows that there were 1,233 persons in families with children and 2,035 persons in adult-only households experiencing homelessness in 2024. Additionally, 162 children in child-only households experienced homelessness in 2024. 123 of which were unaccompanied children. Of the people who experienced homelessness, 618 were chronically homeless, (including 58 chronically homeless families) and 184 were veterans.

NA-40 Figure 1: Homeless Needs Assessment						
Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	140	0	1,233	553	511	102
Persons in Households with Only Children	8	5	162	107	100	9
Persons in Households with Only Adults	322	7	2,035	1,175	1,076	99
Chronically Homeless Individuals	63	1	618			
Chronically Homeless Families	8	0	58			
Veterans	0	0	184	66	65	147
Unaccompanied Child	8	5	123	95	94	9
Persons with HIV	0	0				

**Data Sources:** Homelessness on a given night: 2024 PIT Count Lucas County CoC. # Experiencing, Entering, Exiting homelessness: <https://www.homelessdata.com/dashboard/toledo-oh/projects/> and <https://www.homelessdata.com/dashboard/toledo-oh/community/>. # of days homeless: LSA Stella P.  
Data Source: Toledo Lucas County Homelessness Board

*If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):*

The data for families with children (Persons in Households with Adults and Children), veterans, and unaccompanied youth are all available from the table above.

Data on entrants/exits/duration of Chronically Homeless is not readily available.

*Nature and Extent of Homelessness: (Optional)*

The data from the 2024 Point-in-Time (PIT) count conducted by the Lucas County Continuum of Care provides a snapshot of homelessness in the Toledo area. On the night of the count, 563 individuals were experiencing homelessness across Lucas County, with the vast majority (551 people or approximately 98%) in sheltered situations, primarily in emergency shelters. Only 12 individuals were identified as unsheltered during the count.

The homeless population in Lucas County is diverse in age, with 153 individuals under age 18 (27% of the total), and 32 individuals aged 65 or older (6%). The largest adult age groups are those between 25-34 years (104 individuals) and 35-44 years (88 individuals). The data shows a relatively even gender distribution with 255 women/girls and 307 men/boys.

Racial demographics indicate that Black/African American individuals (232 people including those identifying as Hispanic) represent approximately 41% of the homeless population, while White individuals (243 people including those identifying as Hispanic) account for about 43%. This shows a significant racial disparity when compared to the general population demographics of Lucas County.

The PIT count also identified 64 individuals (about 11% of the total homeless population) as chronically homeless, meaning they have experienced homelessness for at least 12 months – either continuously or across multiple episodes – while living with a disabling condition.

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
<b>Total Number of Households</b>	361	19	0	4	384
<b>Total Number of Persons</b>	503	48	0	12	563
<b>Number of Persons (under age 18)</b>	121	27	0	5	153
<b>Number of Persons (18 - 24)</b>	25	2	0	7	34

	Sheltered			Unsheltered	Total
Number of Persons (25 - 34)	91	13	0	0	104
Number of Persons (35 - 44)	88	0	0	0	88
Number of Persons (45 - 54)	73	1	0	0	74
Number of Persons (55 - 64)	76	2	0	0	78
Number of Persons (65 and older)	29	3	0	0	32
Woman (Girl if child)	211	38	0	6	255
Man (Boy if child)	291	10	0	6	307
Culturally Specific Identity	0	0	0	0	0
Transgender	0	0	0	0	0
Non-Binary	1	0	0	0	1
Questioning	0	0	0	0	0
Different Identity	0	0	0	0	0
Multiple Gender	0	0	0	0	0
American Indian, Alaska Native, or Indigenous (only)	0	0	0	0	0
American Indian, Alaska Native, or Indigenous & Hispanic/Latina/e/o	0	0	0	0	0
Asian or Asian American (only)	2	1	0	0	3
Asian or Asian American & Hispanic/Latina/e/o	0	0	0	0	0

	Sheltered			Unsheltered	Total
Black, African American, or African (only)	206	10	0	5	221
Black, African American, or African & Hispanic/Latina/e/o	10	0	0	1	11
Hispanic/Latina/e/o (only)	18	0	0	0	18
Middle Eastern or North African (only)	0	0	0	0	0
Middle Eastern or North African & Hispanic/Latina/e/o	0	0	0	0	0
Native Hawaiian or Pacific Islander (only)	1	0	0	0	1
Native Hawaiian or Pacific Islander & Hispanic/Latina/e/o	0	0	0	0	0
White (only)	196	18	0	4	218
White & Hispanic/Latina/e/o	6	19	0	0	25
Multi-Racial & Hispanic/Latina/e/o	3	0	0	0	3
Multi-Racial (all other)	61	0	0	2	63
Chronically Homeless	63		0	1	64

Data Source: Lucas County CoC 2024 PIT Count

*Estimate the number and type of families in need of “housing assistance for families with children” and “the families of veterans”.*

According to the 2024 data from the Lucas County Continuum of Care, there were 1,233 persons in families with children experiencing homelessness throughout the year. The Point-in-Time (PIT) count identified 140 sheltered persons in households with adult(s) and child(ren) on a given night, with no unsheltered families with children recorded. The data shows that families with children

experience homelessness for an average of 102 days, indicating a need for both emergency solutions and longer-term housing stability programs.

For veteran families, the 2024 data indicates that 184 veterans experienced homelessness throughout the year. Veterans in the area tend to experience longer periods of homelessness compared to other groups, with an average of 147 days homeless, suggesting a need for specialized supportive housing services that address the unique challenges veterans face. The data shows 66 veterans becoming homeless each year with 65 exiting homelessness, indicating the system is just keeping pace with veteran homelessness rather than significantly reducing it.

Additionally, the data identified 58 chronically homeless families in 2024, representing households that have experienced homelessness for at least 12 months (continuously or across multiple episodes) while dealing with disabling conditions. These families require intensive supportive housing interventions with wrap-around services to address both their housing needs and underlying conditions.

The racial demographics suggest a disproportionate impact on minority populations, with Black/African American individuals representing approximately 41% of the homeless population, significantly higher than their representation in the general Lucas County population. This disparity indicates a need for culturally responsive housing assistance programs that address systemic barriers faced by minority families.

<i>Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.</i>
---

According to the 2024 Point-in-Time (PIT) count data from the Lucas County Continuum of Care, the homeless population reflects a diverse demographic makeup. The data shows that 221 individuals (39.3% of the total homeless population) identified as Black or African American only, with an additional 11 individuals (2.0%) identifying as Black or African American and Hispanic/Latino/a/e/o.

White individuals accounted for 218 people (38.7% of the homeless population), with an additional 25 people (4.4%) identifying as White and Hispanic/Latino/a/e/o. Multi-racial individuals represented 66 people (11.7% of the total), including both Hispanic and non-Hispanic identifications.

The data recorded 18 individuals (3.2%) identifying as Hispanic/Latino/a/e/o only, 3 individuals (0.5%) as Asian or Asian American, and 1 individual (0.2%) as Native Hawaiian or Pacific Islander.

When examining shelter status, the data indicates consistent distribution patterns across demographic groups, with most individuals across all racial and ethnic categories accessing emergency shelter services rather than remaining unsheltered. This suggests that the local shelter system is generally accessible to people of all demographic backgrounds.

*Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.*

Data from the 2024 PIT count shows that Toledo and Lucas County continue to be effective in connecting homeless individuals with shelter resources. Of the 563 homeless individuals identified during the count, 551 people (approximately 98%) were in sheltered situations, with the vast majority (503 individuals) accessing emergency shelters and 48 individuals in transitional housing. Only 12 individuals (2% of the total homeless population) were identified as unsheltered during the count.

When examining the demographic breakdown of sheltered versus unsheltered populations, the data shows that all age groups above 25 years were entirely sheltered, with unsheltered individuals primarily falling into the 18-24 age group (7 individuals) and those under 18 (5 individuals). The gender distribution of unsheltered individuals was evenly split, with 6 females and 6 males identified as unsheltered.

The PIT count data indicates that homelessness in Lucas County is primarily addressed through the emergency shelter system, with transitional housing serving as a secondary resource. The low number of unsheltered individuals suggests that the existing shelter infrastructure is generally accessible, though continued efforts to engage with the small unsheltered population remain important, particularly for youth and young adults who appear somewhat more likely to remain unsheltered.

## **Discussion**

The 2024 homelessness data for Toledo and Lucas County reveals both strengths and ongoing challenges in addressing homelessness in the community. The local shelter system demonstrates effectiveness in providing emergency accommodations, with 98% of identified homeless individuals accessing shelter services on the night of the PIT count. However, the data also shows concerning trends, including the relatively long average duration of homelessness (102 days for families with children and 147 days for veterans) and the persistence of chronic homelessness affecting 64 individuals and 58 families. The escalation of rental costs and the lack of available move-in ready affordable housing options limits the ability of quickly moving people from homelessness into housing.

While emergency response systems appear to be functioning well, the data suggests a need for enhanced housing stability programs and supportive services that can more effectively address the underlying causes of homelessness and accelerate transitions to permanent housing. The nearly equal numbers of veterans entering and exiting homelessness annually indicates that current interventions are maintaining rather than improving the situation. As Toledo implements its Consolidated Plan, focusing resources on reducing these durations of homelessness and enhancing permanent supportive housing options—particularly for families with children, veterans, and those experiencing chronic homelessness—will be critical priorities for creating lasting impact.

# NA-45 Non-Homeless Special Needs Assessment

## - 91.205 (b,d)

### Introduction

There are households in the City of Toledo that may have special housing and supportive service needs unrelated to homelessness. Some of these population groups include the elderly and frail elderly; those living with some type of physical or cognitive disability; those living with HIV/AIDS and their families; persons with substance use disorders; and victims of domestic violence, dating violence, sexual assault, and stalking. These groups typically face greater housing challenges than the general population due to their specific circumstances and the City's housing stock may not be suitable for households with particular special needs. These groups may also require special attention due to additional social services required.

<i>Describe the characteristics of special needs populations in your community:</i>
---

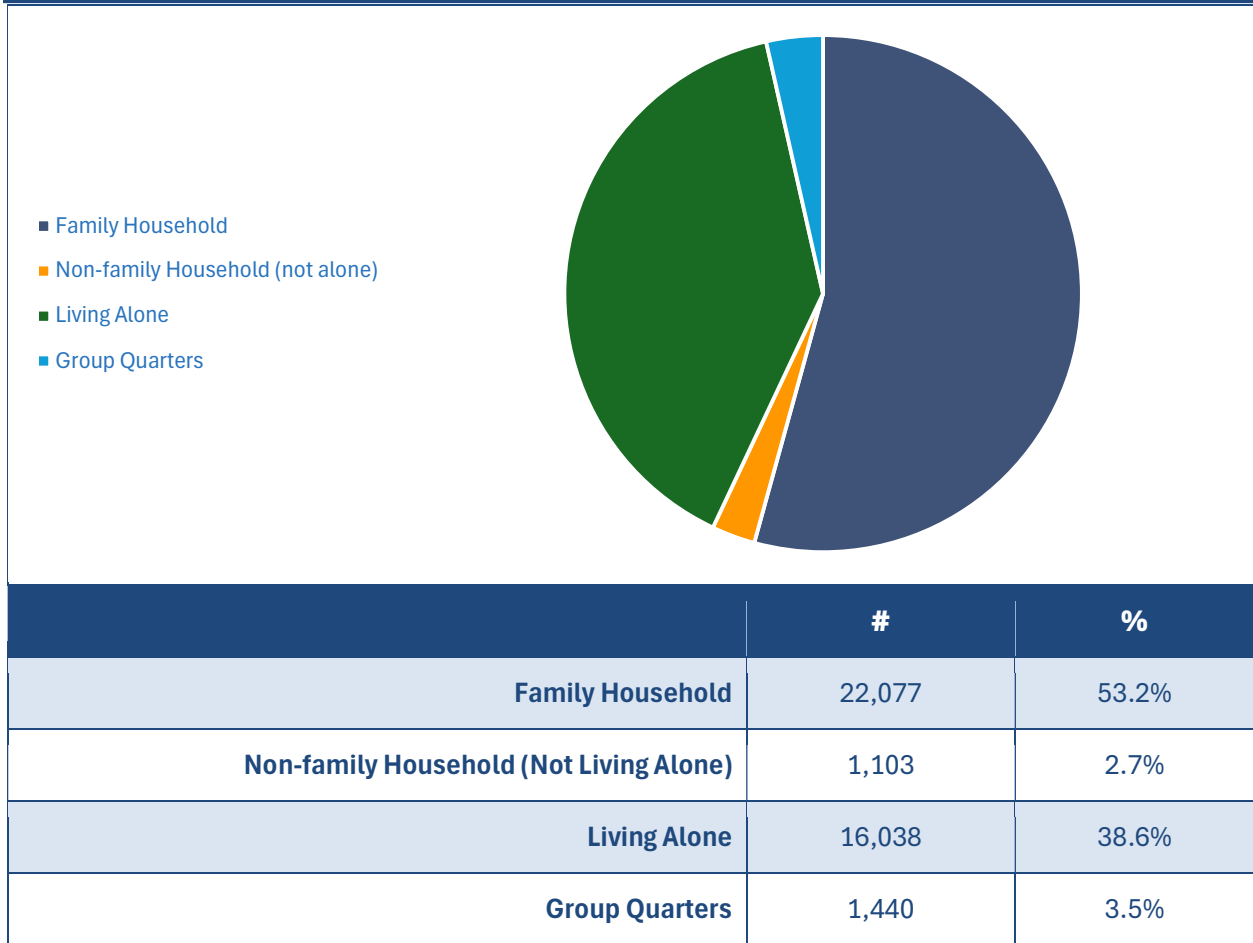
### Elderly and Frail Elderly

In the City of Toledo, the senior population has seen significant growth over the past several years. As of the 2023 5-Year ACS Estimate the population of Toledo aged 65 and older comprised 15.5% of the total population of the city, standing at 41,518 persons. The total number of senior households has also grown over the past 10+ years and is currently 29,304 households in Toledo, just under one-quarter of all households in the city (24.7% of all households). 38.6% of senior households live alone, and 72.4% of all senior households own their own home.

Generally, the senior population has more limited fixed incomes than the population as a whole, primarily Social Security and other retirement income. However, 18% of all older individuals in Toledo are still in the labor force – with 7,032 working seniors aged 65 and older, and another 452 in the labor force seeking employment. This is likely a manifestation of the rising cost of living, particularly the ongoing housing cost burden experienced by seniors, or an interest to stay active and social in their community.

Many seniors also lack their own transportation and are often subject to social isolation when they have limited opportunities to leave their homes and engage in beneficial socializing and recreational activities. There is a large and growing concern among Toledo seniors about their ability to afford the transition from independent living to assisted living and nursing home care. Income limits for Medicaid are incredibly low in Ohio and many seniors exceed the income threshold but still have very low incomes. The state's cost share leaves seniors with incredibly high medical expenses even when covered by Medicare.

**NA-45 Figure 1: Senior Population by Household Type**



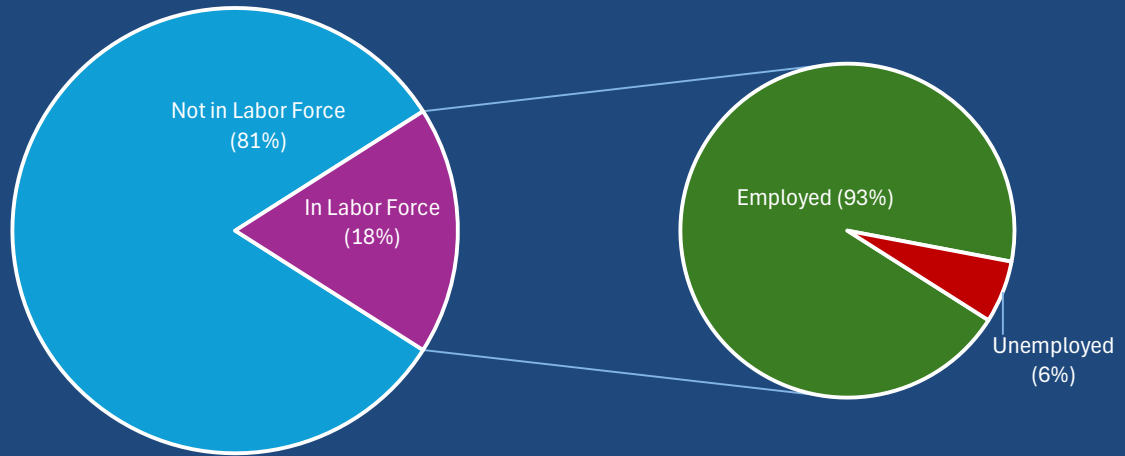
Data Source: 2019-2023 ACS - B09020

**NA-45 Figure 2: Senior Households Cost Burden**

	Renters		Owners		Total	
	#	%	#	%	#	%
<b>Cost Burden &lt;= 30%</b>	4,415	49.3%	17,015	77.3%	21,430	69.2%
<b>Cost Burden &gt; 30%</b>	4,535	50.7%	4,985	22.7%	9,520	30.8%

Data Source: 2017-2021 CHAS Table 7



**NA-45 Figure 3: Seniors in the Labor Force**

	#	%
Employed	7,032	16.9%
Unemployed	452	1.1%
Not in Labor Force	34,034	82.0%

Data Source: 2019-2023 ACS - B23001

**NA-45 Figure 4: Senior Population by Poverty Status**

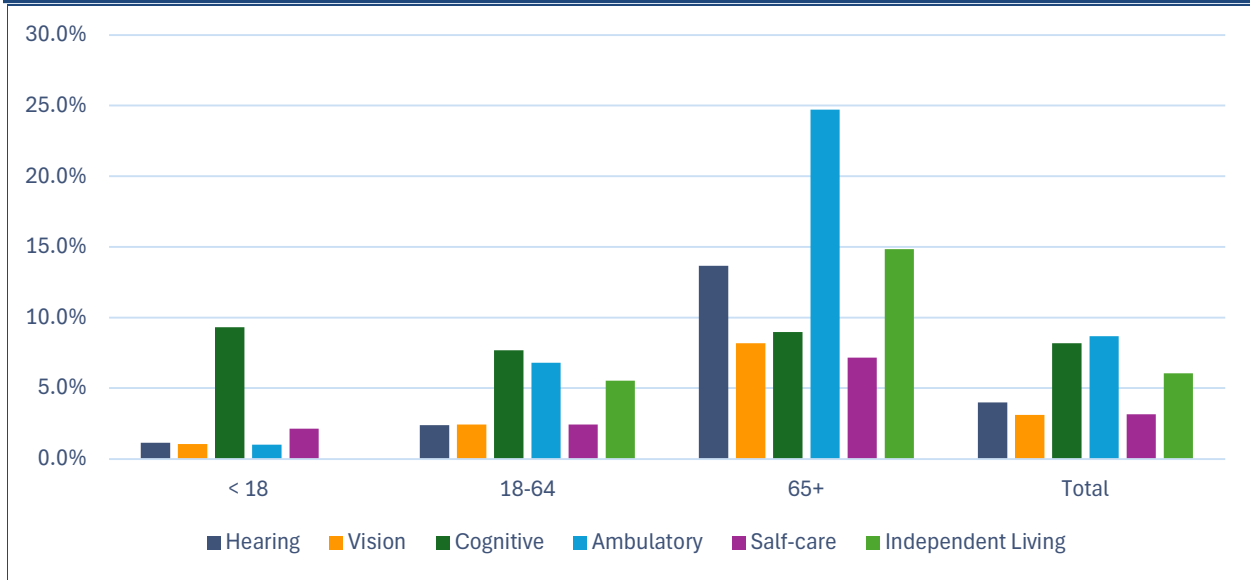
	#	%
Income at or above poverty level	34,446	85.3%
Income below poverty level	5,935	14.7%

Data Source: 2019-2023 ACS - B17001

### Persons with Physical or Cognitive Disabilities

The largest absolute number of City residents living with a disability are persons 18-64, with 29,584 persons living with a disability (18.1% of the total population). However, as a percentage of the total population by age, older individuals aged 65 and older are most likely to live with a disability, with 38.4% living with some type of disability. Residents that are physically or cognitively disabled have special housing needs to accommodate their specific conditions.

NA-45 Figure 5: Disabilities by Age



	< 18		18-64		65+		Total	
	#	%	#	%	#	%	#	%
Hearing difficulty	509	1.1%	3,890	2.4%	5,519	13.7%	9,918	4.0%
Vision difficulty	462	1.0%	3,965	2.4%	3,300	8.2%	7,727	3.1%
Cognitive difficulty	4,131	9.3%	12,566	7.7%	3,622	9.0%	20,319	8.2%
Ambulatory difficulty	447	1.0%	11,114	6.8%	9,976	24.7%	21,537	8.7%
Self-care difficulty	949	2.1%	3,986	2.4%	2,894	7.2%	7,829	3.2%
Independent living difficulty	n/a	n/a	9,036	5.5%	5,993	14.8%	15,029	6.1%
Total with any disability	4,966	11.2%	29,584	18.1%	15,488	38.4%	50,038	20.1%
Total Population	44,372		163,658		40,381		248,411	

Data Source: 2019-2023 ACS – Tables B18101, S1810

## Persons with Developmental Disabilities

According to the Ohio Department of Developmental Disabilities, there are 3,719 persons with development disabilities living in Lucas County. Among these individuals, 38% are under the age of 18 and are mostly living with parents or guardians. Another 7.4% are between the ages of 18 and 21, a critical period of transition towards adulthood and independence.

## **Persons with Substance Use Disorders**

A key principle to reduce substance abuse is to treat alcohol and drug addiction as a medical issue rather than a criminal issue. An addiction to illicit drugs changes the way a person's brain works, and consequently, the way they think and act. There is recognition that drug and alcohol addiction can be managed and treated, and with the appropriate treatments people can create for themselves a renewed sense of self and personal responsibility. Rehabilitation is possible through adherence to prescribed clinical treatment and counseling, individualized services coordination, and participation in recovery programs. However, much of this is predicated on the stability of one's housing.

Comprehensive data specific to Toledo or Lucas County detailing the number of residents with substance use disorders (SUDs) is limited. However, statewide data offers insights that can be extrapolated to understand the broader context of substance use in the region.

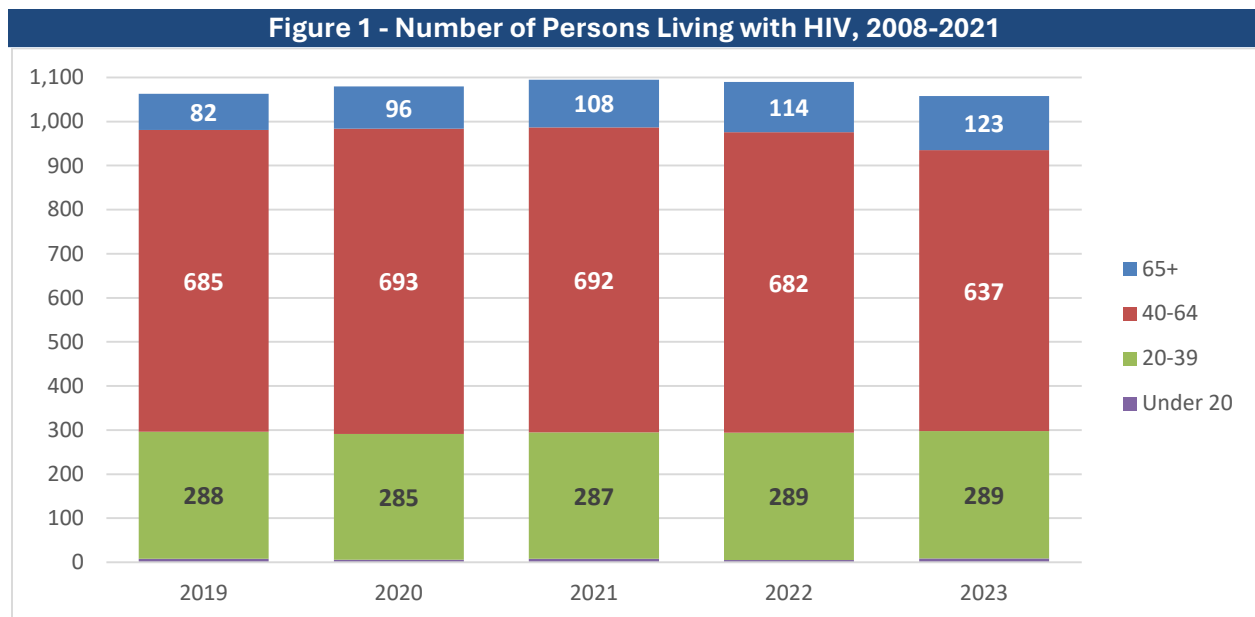
According to the Behavioral Health Barometer for Ohio, Volume 6, measured through the 2019 National Survey on Drug Use and Health and the National Survey of Substance Abuse Treatment Services, the prevalence of Substance Use Disorders in Ohio is as follows:

- Alcohol Use Disorder (AUD): Approximately 5.1% of Ohio residents aged 12 and older experienced AUD in a year. This would account for approximately 11,500 residents of Toledo aged 12 and over.
- Illicit Drug Use Disorder: Around 3.6% of Ohioans aged 12 and older had an illicit drug use disorder in the past year. This would account for approximately 8,100 residents of Toledo aged 12 and over.
- Opioid Use Disorder: About 1.4% of individuals aged 12 and older in Ohio suffered from an opioid use disorder in the past year. This would account for approximately 3,150 residents of Toledo aged 12 and over.

Young adults aged 18 to 25 exhibit higher rates of substance use disorders. Alcohol Use Disorder among this age group in Ohio is 10.1%; Illicit Drug Use Disorder is 8.6%; and Opioid Use Disorder is 1.4%.

## **Persons with HIV/AIDS**

For Lucas County, there were 27 new HIV infections in calendar year 2023. This was down from 40 new infections in 2019. Among these newly infected individuals, 22 were male and 5 were female. The ages of the newly infected individuals ranged from the 15-19 age group all the way to the 65+ age group. New infections were primarily concentrated in the Black or African American community, with 17 new infections (63%), compared to 5 new infections for White individuals (19%), 3 for Hispanic or Latino individuals (11%), and 2 multi-racial individual (7%). Between 2019 and 2023, men were much more likely to become infected with HIV, ranging from a low of 74% of new infections to a high of 100% of new infections. The total number of persons living with HIV in Lucas County as of 2023 was 1,058. There was a slight increase between 2019 and 2021/2022, then a reduction as of 2023.



**Data Source:** Ohio Department of Health

## Victims of Domestic Violence

In 2023, the Toledo Police Department reported 1,691 domestic violence incidents that resulted in a charge, 247 that resulted in some other charge, and another 6,305 domestic violence incidents that did not result in any charge.<sup>2</sup> These figures highlight the significant number of domestic violence incidents within the city. The vast majority of these incidents involve victims who are women.

Based on the conversation with Lisa McDuffie, President and CEO of the YWCA of Northwest Ohio, several critical housing and supportive service needs for victims of domestic violence in Toledo emerge. These needs include emergency shelter, transitional and long-term housing, wraparound supportive services, and system-wide coordination improvements.

The YWCA of Northwest Ohio is the only emergency domestic violence shelter in the community. It provides 24/7 emergency shelter and rape crisis services, ensuring that victims have a safe place to go at any time. The trends in services over time have led to an increased need for the following services:

- Increased mental health support: This can be a challenge as there is often a need for services that are beyond the skills of case management staff. Trained mental health professionals are needed to address the increased mental health needs of victims.

<sup>2</sup> <https://www.ohioattorneygeneral.gov/Files/Reports/Domestic-Violence-Reports/Domestic-Violence-Reports-2023/2023-Domestic-Violence-Incidents-by-County-and-Age>

- Substance abuse support: There is a rising concern as many survivors struggle with addiction that often is a result of their abusers.
- Many survivors arrive with undiagnosed or untreated mental health conditions and/or substance use issues. The YWCA lacks dedicated mental health and substance abuse staff due to no funding streams supporting these services. Survivors can also be hesitant to engage with external providers, making on-site staff a critical missing resource.
- Employment and life skills training: Long-term training is needed for individuals to access higher-paying employment opportunities, though this is difficult to implement within the short 60-day emergency stay period.
- Case management and advocacy to help survivors navigate complex systems such as housing applications, debt resolution, legal processes, etc.
- Many survivors now arrive with multiple children, sometimes as many as seven. There is also a rising trend of sex trafficking victims among domestic violence survivors, requiring specialized support services and safety measures. Perpetrators are increasingly using digital blackmail and social media threats, complicating survivors' ability to safely escape abuse.

There is a lack of Permanent Supportive Housing for victims of domestic violence and many survivors leave the YWCA's 60-day emergency shelter with nowhere to go. This is often due to insufficient transitional housing options. There are reported delays and a backlog in approvals from Lucas Metropolitan Housing (LMH), sometimes delaying placement by six months to a year for public housing or housing choice vouchers.

Strict HUD regulations often prevent quick housing placement as survivors of domestic violence are required to follow the same application process as other homeless individuals. Further, survivors often face barriers to securing vouchers due to previous unpaid rent, which disqualifies them from LMH housing.

## **Veterans**

Toledo has a veteran population of 12,581, or about 6% of the population as a whole. This population skews much older and more male than the population as a whole. Education levels of the veteran population are similar to the population as a whole, with veterans more likely to cluster in the median education ranges and non-veterans more likely to either have less than a high school diploma **or** have a bachelor's degree or higher. Median income for veterans is higher than for non-veterans, which should not be surprising given that the veterans age and gender correlate with higher incomes.

Approximately 20% of Toledo veterans have a service-connected disability rating greater than 10%. In addition, veterans age distribution makes them much more likely to have at least one disability.

	<b>Veteran</b>	<b>Non-Veteran</b>
<b>18-34</b>	7.0%	35.2%
<b>35-54</b>	20.0%	30.8%
<b>55-64</b>	24.1%	15.7%
<b>65-74</b>	29.3%	11.5%
<b>75+</b>	19.6%	6.8%
<b>Male</b>	90.8%	45.2%
<b>Female</b>	9.2%	54.8%
<b>Less than high school graduate</b>	6.9%	12.4%
<b>High school graduate (includes equivalency)</b>	35.4%	32.9%
<b>Some college or associate's degree</b>	39.0%	33.6%
<b>Bachelor's degree or higher</b>	18.7%	21.1%
<b>Income</b>	\$ 38,700	\$ 30,243

Data Source: 2019-2023 ACS

## Youth Aging out of Foster Care

In Toledo, approximately 200 children age out of the foster care system each year. This means they turn 18 without being reunited with their families or being adopted. Aging out can present significant challenges as these young adults transition to independent living, including:

- **Homelessness:** Many young adults who age out of foster care struggle to find stable housing. Studies show that between 11% and 36% of young people aging out of foster care experience homelessness during their transition to adulthood.
- **Employment and Financial Stability:** Securing and maintaining employment can be difficult due to a lack of job experience and necessary life skills. Financial independence is often a significant hurdle.
- **Education:** Continuity in education is often disrupted by frequent moves and instability in foster care. This can lead to lower educational attainment and limited opportunities for higher education.

- **Mental Health:** Many foster youths have experienced trauma, abuse, or neglect, leading to mental health issues such as depression, anxiety, and PTSD. These issues can be exacerbated by the stress of transitioning to independent living.
- **Lack of Support Networks:** Without a stable family or support system, these young adults may feel isolated and lack the guidance needed to navigate adulthood.
- **Substance Abuse:** The absence of a supportive environment can increase the risk of substance abuse as a coping mechanism for the challenges they face.

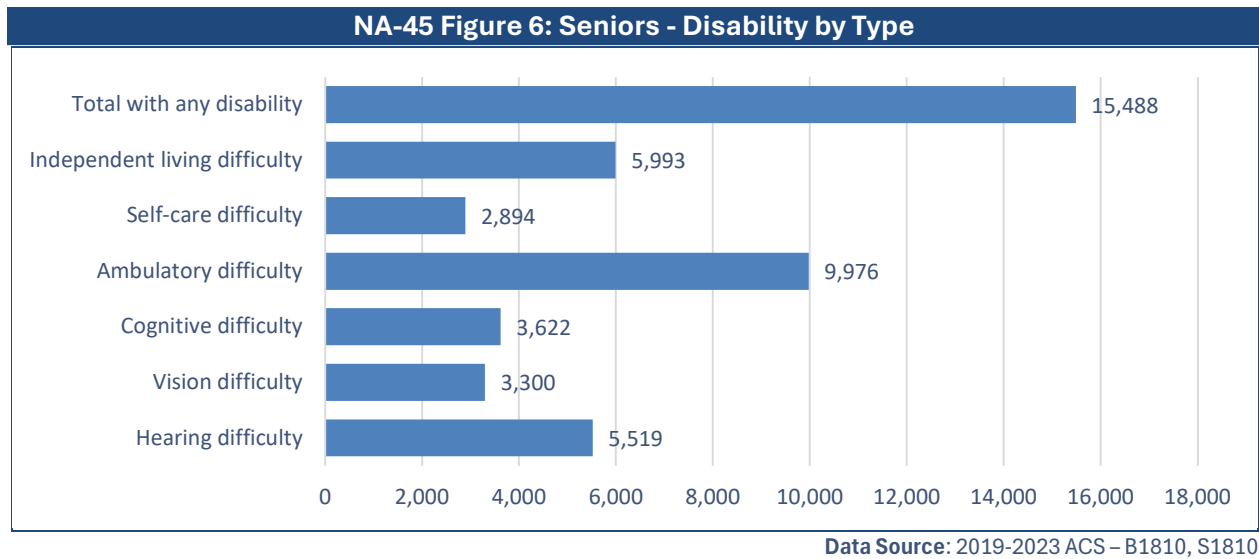
Addressing these challenges requires comprehensive support systems, including access to housing, education, employment opportunities, mental health services, and mentorship programs.

*What are the housing and supportive service needs of these populations and how are these needs determined?*

### **Elderly and Frail Elderly**

While 85.3% of Toledo seniors aged 65 and older are at or above the Federal Poverty Level, there are 9,520 elderly households (30.8%) that experience housing cost burdens of over 30% (4,535 renter-occupied households (49.3%) and 4,985 owner-occupied (22.7%) households). Further, as discussed in NA-10, there are 2,465 elderly renters (30.4%) and 2,335 elderly homeowners (11.0%) of all income categories that spend more than 50% of their income on housing. Additionally, limited incomes inhibit the ability to make the necessary home improvements to ensure their homes are in compliance with the City's building and property maintenance codes that ensure the home meets minimum health and safety standards. It is not uncommon in the city to see homes occupied by seniors in need of repairs to major building components, roofing repairs, window replacement, and heating system replacements, but also exterior paint and siding deterioration.

The elderly and frail elderly populations have additional unique challenges that come with age, including chronic and other medical conditions, higher rates of physical and mental disabilities (such as Alzheimer's and dementia), mobility challenges, and higher health care costs. According to the 2019-2023 American Community Survey, 38.4% of the elderly population aged 65 and over in Toledo, 15,488 seniors, experiences at least one type of mental or physical disability. Among the most common are ambulatory and independent living difficulties, representing 24.7% and 14.8% of the elderly population respectively. While these are the most common disabilities among the elderly population in the city, other disabilities also greatly impact their housing options. Seniors are often in need of in-home support or other types of housing such as intermediate care facilities, nursing homes, and other housing that includes a planned service component to care for seniors when independent living, self-care, and mobility issues increasingly become a challenge. The most significant challenge to providing these services to the senior population is the lack of healthcare staff to provide these services.



Further, many seniors also lack their own transportation and are often subject to social isolation when they have limited opportunities to leave their homes and engage in beneficial socializing and recreational activities. There are several Senior Centers in Toledo that have a significant number of daily activities for older individuals that provide entertainment, recreation, meals, and various case management services to the elderly population; however, they are not always able to provide transportation to and from the centers. Often, they are only able to serve seniors who are able to coordinate their own transportation. This leaves many seniors unable to access these services.

### **Persons with Physical or Cognitive Disabilities**

Ambulatory difficulty inhibits an individual's ability to walk or climb stairs. Due to the physical characteristics of much of the city's housing stock, with many split-level, multi-story homes with entry stairs, a primary concern is providing housing options for the 21,537 Toledo residents that experience ambulatory difficulty, and the 22,858 residents (9.2% of the total Toledo population) with self-care and independent living difficulties. Specific construction features and accessibility modifications are often required for those with mobility challenges, depending on the type and severity of these challenges (i.e., handrails, ramps, wider doorways, grab-bars, etc.).

While the city is not fully aware of the total population that struggles living in housing units that do not have all the elements and amenities required for those with mobility challenges, given the size of the population and the anecdotal information from the citizen participation and consultation process, it is estimated to be several thousand. To maintain people living in their own homes longer, there is a need to make appropriate in-home modifications described above.

Stable housing for persons with mental illness is hugely beneficial regarding their mental health care because the primary location of a support network is directly linked to their residence. Those living with a mental or developmental disability can find it difficult to retain housing and often their disability prevents them from finding suitable employment or earning an adequate wage that allows for independent living. Many individuals with mental illness are dependent solely on



Supplemental Security Income as their primary source of income. Affordability issues become even more challenging for this population as there are few options in the private housing market and their disability leaves them at greater risk of homelessness and ill-equipped to navigate the public support system without substantial assistance.

Individuals with moderate to severe dementia or another cognitive impairment often require special care including supervision of up to 24 hours a day. Some may exhibit impulsive or difficult behaviors, paranoia, lack of motivation, memory problems, incontinence, poor judgment, and wandering that could be detrimental to their health and safety. Occasionally specialized communication techniques and/or devices are needed for communication. They may need help with activities of daily living, such as bathing, eating, transferring from bed to a chair or wheelchair, toileting, or other personal care needs.

### **Persons with Substance Use Disorders**

In addition to diversion, specific treatment can manifest in a variety of forms depending on the specific acuity of the circumstance. A continuum of services ranging from in-patient hospitalization, residential sobriety treatment in a supportive and structured environment, long-term outpatient treatment, relapse prevention and recovery programs, regular toxicology screening, medication management, and other programs could be necessary to increase the likelihood of future abstinence from drugs and alcohol. Often times, there are contributing or concurrent conditions that result in alcohol or drug abuse which need to be addressed in order to assist the individual from dependence on alcohol or drugs. In all cases, stable housing is critical to recovery.

### **Victims of Domestic Violence**

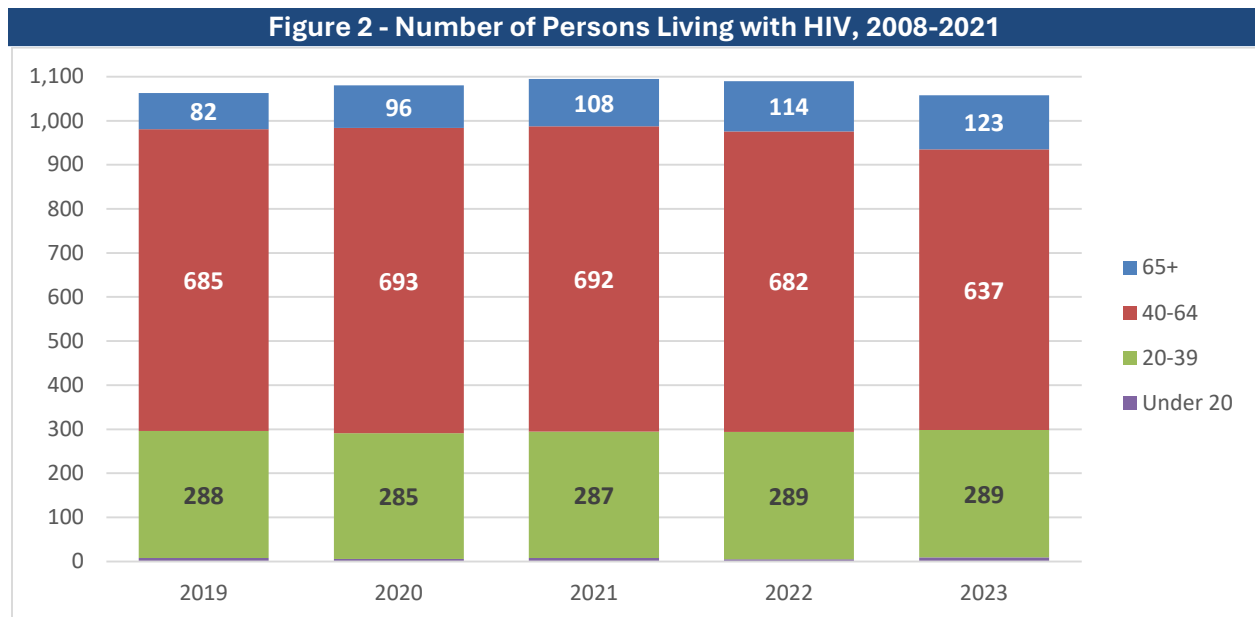
The housing and service needs for Victims of Domestic Violence are significant given the nature of the abuse. The immediate need for victims of domestic violence is stable affordable housing that allows people and their children to leave an abusive environment and become stable and independent. Additionally, there is a need for basic household items such as clothing, diapers, food, toiletries, etc. There is also a need for cell phones, laptops, and internet service.

Legal services are critical in order to obtain a protective order and custody of children. Additional legal services are crucial for families with mixed immigration status, in particular legal services related to U Visas to strengthen the ability of law enforcement to investigate and prosecute cases of domestic violence, sexual assault, trafficking of noncitizens and other crimes, while protecting victims who have suffered substantial mental or physical abuse.

Support for children who have been impacted is crucial: support groups, parent skill building, clinical services for coping skills, medical care, and coordination of services with the public school district. Affordable and accessible childcare is also needed if and when the parent begins working. Another important service is workforce training to increase their economic mobility, as well as ESL classes for non-English speaking adults or other educational opportunities for low-literacy adults.

*Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:*

For Lucas County, there were 27 new HIV infections in calendar year 2023. This was down from 40 new infections in 2019. Among these newly infected individuals, 22 were male and 5 were female. The ages of the newly infected individuals ranged from the 15-19 age group all the way to the 65+ age group. New infections were primarily concentrated in the Black or African American community, with 17 new infections (63%), compared to 5 new infections for White individuals (19%), 3 for Hispanic or Latino individuals (11%), and 2 multi-racial individual (7%). Between 2019 and 2023, men were much more likely to become infected with HIV, ranging from a low of 74% of new infections to a high of 100% of new infections. The total number of persons living with HIV in Lucas County as of 2023 was 1,058. There was a slight increase between 2019 and 2021/2022, then a reduction as of 2023.



**Data Source:** Ohio Department of Health

*If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))*

Toledo has no preference for its HOME TBRA activities.

*Discussion:*

The above special needs populations face a multitude of housing and supportive service needs unique to their condition. A wide availability of housing choices for each of these groups, with the requisite supporting services will be necessary to truly meet their needs. Key highlights include additional accommodations for the city's aging population and those that live with ambulatory and independent living difficulties. Individuals living with disabilities need housing that can

accommodate wheelchairs or other mobility devices that allow individuals with mobility challenges to access upper and lower levels of homes. Those living with HIV/AIDS are in need of housing and supportive medically related services. Similarly, those diagnosed with mental or developmental disabilities require affordable housing which allows for independent living with the requisite supportive services. Victims of domestic violence are in immediate need of secure confidential housing to escape immediate violence and longer-term support to move from immediate crisis management to longer-term stability. These needs are far beyond the resources available, and the City of Toledo is fully supportive of additional state-level efforts for additional affordable housing resources for rehabilitation and new development to broaden the spectrum of housing choices in the city.

# NA-50 Non-Housing Community Development Needs - 91.215 (f)

*Describe the jurisdiction's need for Public Facilities*

The need for adequate public facilities such as neighborhood community centers, senior centers, and adequate healthcare centers are considered high priority needs by Toledo's residents, although comments from several community agencies highlight the need for better coordination among health care providers. Another critical need was related to additional childcare facilities, including afterschool programs and summer programs for children and teens. This is especially important for working families to have free or low-cost childcare and youth enrichment programs. Parks and Recreation Area improvements are another high priority needs identified by Toledo residents. These needs range from enhanced, cleaned and improved parks to new facilities, such as a public recreation center that would promote recreational activities year around.

Several investments in the city have directly responded to these needs.

- The Wayman Palmer YMCA opened in March 2025. This facility has state-of-the-art workout equipment and a large gym, and a gaming computer lab for kids and a kids zone.
- The Savage Park Splash Pad will reopen in the Summer of 2025 to provide outdoor recreation for children in the neighborhood.
- Glass City Metropark Phase 2 was completed in June 2023 and offers a variety of amenities for residents and visitors, including scenic views of the Maumee River and the downtown Toledo skyline, the Discovery Play Areas, Kayak Cove & Adventure Boardwalk, Sturgeon Point & Natural Resource Education Area, a Sledding Hill, and Public Art Features.
- As part of the expansion of the Glass City Riverwalk, Toledo Pickle is a year-round pickleball court with 10 indoor courts and 2 outdoor courts for recreational and league play.

As part of the Peace in Motion: Toledo's Path to Community Safety plan, there were important recommendations related to community facility needs.

- Existing community centers or public libraries in core neighborhoods could be identified as Community Safe Havens with programming, trauma services, and youth mentorship. Specific locations can be selected through a youth-led participatory mapping exercise to select high-priority locations for investment.
- Investments in Safe Passage corridors near schools with lighting, sidewalks, and beautification. Target areas identified through the Disinvestment and Disrepair Index. Coordinate with Land Bank and Rock the Block efforts to fund site clearance and community space redevelopment.
- Purchase and equip a mobile resource unit to deliver workforce development, counseling, and legal services directly to high-need areas, especially for outreach to youth and formerly incarcerated residents.

### *How were these needs determined?*

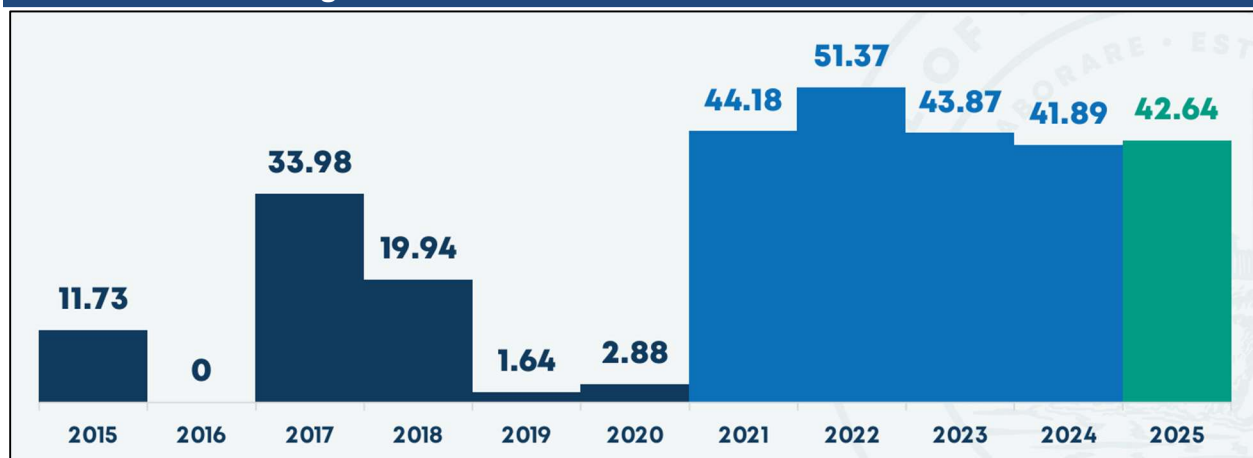
As part of the consultation and citizen participation processes, CEW Advisors solicited information from community-based organizations, social service providers, relevant municipal staff, and Toledo residents to identify the most important community needs, neighborhood concerns, and public facilities. Public facility needs were collected in several ways: through the online community needs survey, through citizen participation discussions and focus groups, in consultation with municipal staff, and evaluating relevant planning documents including Peace in Motion, and Forward Toledo, the City's Land Use Plan.

### *Describe the jurisdiction's need for Public Improvements:*

Like many post-industrial cities, Toledo has experienced deterioration of its aging road infrastructure, sidewalks, sewers, catch basins, buildings, and schools. Due to the harsh winters that persist in this region of the country, the city's infrastructure needs are extensive, and these infrastructure improvements have significant costs associated with them. There are several key public infrastructure improvements needed to support the city's development and enhance the quality of life for residents. The main areas of concern include the following:

**Streets and Traffic Management:** The city's road network needs to be modernized to better support all users, including pedestrians, cyclists, and public transit riders, as well as automobile traffic. There are safety concerns regarding pedestrian and cyclist accessibility due to high dependency on automobiles. Traffic calming measures, such as improved crosswalks and protected bike lanes, could be important additional improvements to reduce the risks of accidents. In 2020, voters in Toledo approved a dedicated 0.25% income tax levy which generates annual funding for road improvements projects. This has resulted in approximately 223 total lane miles of road repairs throughout the city from 2021 through 2025.

**Figure 3 - Lane Miles Resurfaced or Reconstructed**



Data Source: City of Toledo

**Sidewalks and Walkability:** Throughout the city many sidewalks are in poor condition, and some neighborhoods lack sufficient pedestrian infrastructure. Walkability is hindered by a lack of

connectivity between residential areas and commercial or employment hubs. There are needs for sidewalk repairs and expansion, prioritizing ADA compliance and universal design standards to improve pedestrian connections between neighborhoods and commercial districts.

**Sewer and Stormwater Management:** Toledo's aging sewer system has historically discharged into waterways during heavy rain, negatively impacting water quality in Lake Erie. Urbanization and excessive impervious surfaces (pavement, buildings) have led to increased stormwater runoff and flooding. These issues could be ameliorated by implementing Green Stormwater Infrastructure (GSI) such as permeable pavements, rain gardens, and bioswales to reduce runoff. The city should continue investing in the Toledo Waterways Initiative to prevent sewer overflows and enhance water quality. Additional zoning regulation changes could also limit impervious coverage in commercial districts.

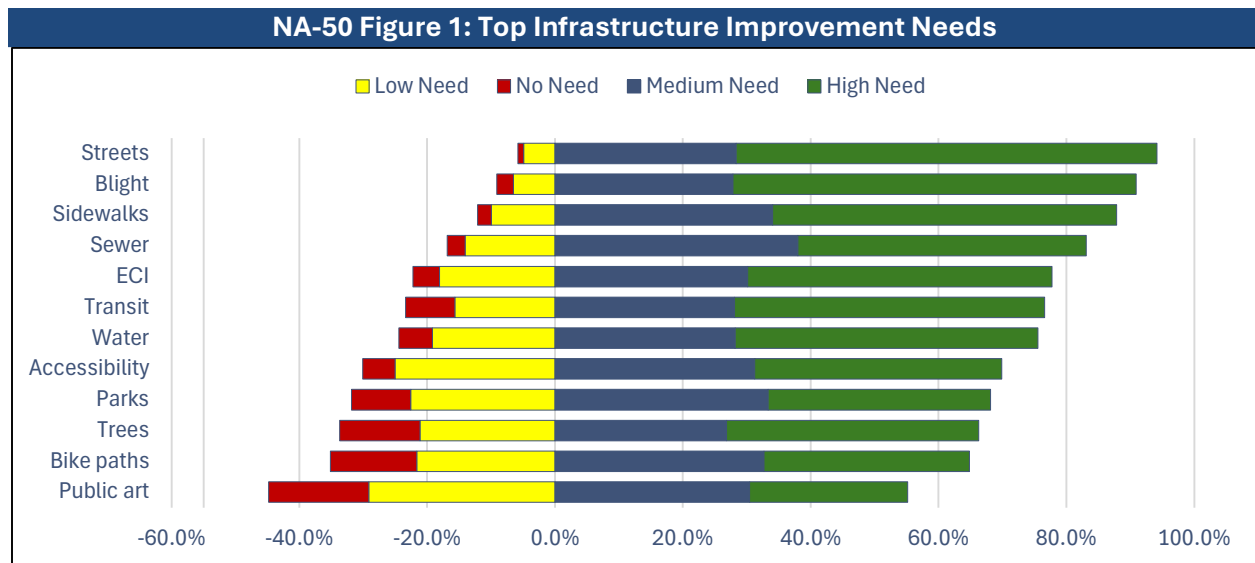
**Public Transportation:** TARTA is currently updating its own public transportation strategic plan. Current public transit options are often insufficient for reducing car dependency and providing equitable access to jobs and services. A recurring issue is the difficulty for residents, particularly in underserved neighborhoods (e.g., Junction, Historic South End, East Toledo, and other neighborhoods) to access jobs located outside the city. Existing transit routes may take too long or not align with work shifts, reducing their effectiveness. Additionally, there is a lack of bus-only lanes, improved transit stops, and first-mile/last-mile connections discourages transit use. TARTA aims to reduce commute times to 45 minutes but struggles with low evening ridership, leading to possible service reductions at off-peak hours. Third-shift jobs lack reliable transit options, preventing workers from using public transportation to commute to and from work.

**Green Infrastructure and Environmental Sustainability:** Finally, there are areas throughout the city that are urban heat islands, exacerbated by a lack of green spaces, tree canopy, and excessive pavement. Pollution and runoff from roads and industrial sites contribute to declining air and water quality. The city should expand urban tree canopies and increase green spaces to mitigate air pollution and potentially invest in renewable energy projects, such as solar fields and wind farms and strengthen environmental policies to reduce industrial emissions and stormwater contamination.

As a result of the Harvard Bloomberg Innovation Track program, and collaboration between multiple city departments and leaders, in 2024, the city implemented a Neighborhood Block-by-Block (BbB) bulk collection program to assist Toledo residents in removing and recycling bulk waste properly. The BbB events collected over 1.2 million pounds of waste which supplemented 13 Clean Toledo Recycling events which collected over 150 tons of tires, 96,558 pounds of electronic waste, 661,849 pounds of blight waste and 610 cubic yards of green waste. In 2024, 300 vacant buildings were demolished, and 2,455 trees were planted.

Additionally, as part of the online Housing & Community Development Survey, residents were asked to rank various public infrastructure improvements using a scale of no need, low need, medium, need, and high need. The results of this online community needs survey listed the top five

infrastructure improvements needs for the city as: (1) street and road improvements, (2) neighborhood blight, (3) sidewalk improvements, (4) sewer system and flood drainage improvements, and (5) environmental contamination issues.



	Definition	No Need	Low Need	Medium Need	High Need
<b>Streets</b>	Street and road improvements	0.9%	4.9%	28.4%	65.8%
<b>Blight</b>	Neighborhood blight	2.6%	6.5%	27.8%	63.1%
<b>Sidewalks</b>	Sidewalk improvements	2.2%	10.0%	34.1%	53.8%
<b>Sewer</b>	Sewer system / flood draining improvements	2.8%	14.0%	38.0%	45.1%
<b>ECI</b>	Environmental contamination issues	4.2%	18.1%	30.2%	47.6%
<b>Transit</b>	Public transportation improvements	7.7%	15.7%	28.1%	48.5%
<b>Water</b>	Drinking water quality improvements	5.3%	19.2%	28.2%	47.4%
<b>Accessibility</b>	Handicapped accessibility for public buildings	5.0%	25.0%	31.3%	38.6%
<b>Parks</b>	Public parks and recreation facilities	9.2%	22.6%	33.3%	34.8%
<b>Trees</b>	Tree planting	12.6%	21.1%	26.9%	39.4%

	Definition	No Need	Low Need	Medium Need	High Need
<b>Bike paths</b>	Bicycle and walking paths	13.5%	21.6%	32.7%	32.1%
<b>Public art</b>	Public art / murals / beautification	15.7%	29.1%	30.5%	24.7%

**Data Source:** CEW Advisors, Inc. Housing & Community Development Survey

#### *How were these needs determined?*

As part of the consultation and citizen participation processes, CEW Advisors solicited information from community-based organizations, social service providers, relevant municipal staff, and Toledo residents to identify the most important community needs, neighborhood concerns, and public facilities. Public improvement needs were collected in several ways: through the online community needs survey, through citizen participation discussions and focus groups, in consultation with municipal staff, and evaluating relevant planning documents including Forward Toledo, the City's Land Use Plan.

#### *Describe the jurisdiction's need for Public Services:*

In order to identify the various public service needs in the Toledo community, CEW Advisors conducted significant research and analysis, consulted with numerous community agencies and neighborhood associations, reviewed community needs assessments and reports. As part of the online Housing & Community Development Survey, residents were asked to rank various public services using a scale of no need, low need, medium need, and high need. The results of this online community needs survey listed the top 10 public service needs for Toledo as:

1. Crime prevention
2. Afterschool and summer recreation programs for youth and teens
3. Mental health services / Services for persons with mental illness
4. Affordable childcare
5. Programs or services for the elderly and frail elderly
6. Adult education / workforce training classes
7. Financial literacy programs
8. Services for victims of domestic violence
9. Healthcare services
10. Programs and services for the homeless

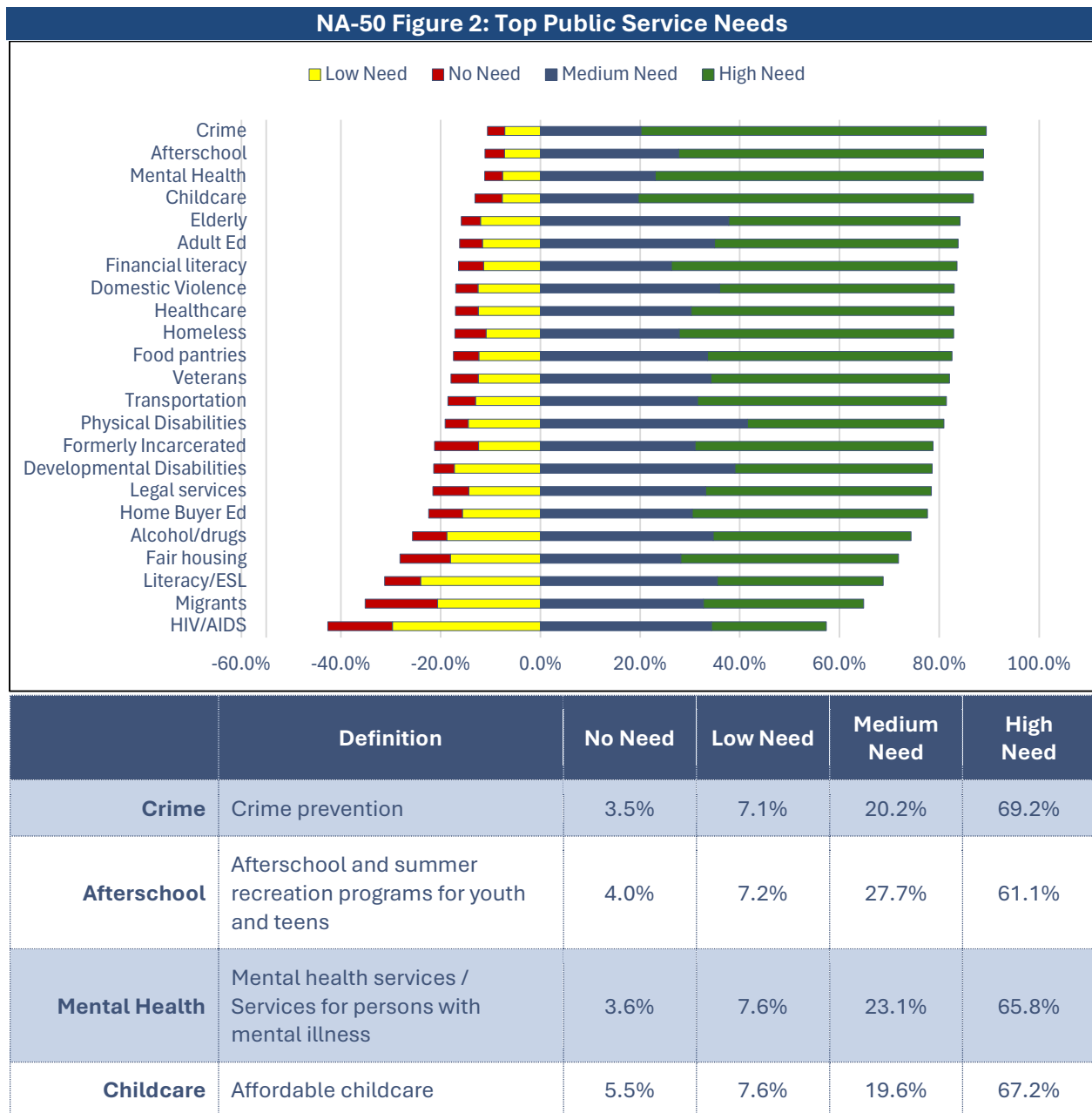
Further, several public services were identified as urgent needs during the five community meetings that were organized as part of the citizen participation process of the Consolidated Plan. These included:

- Programs for Children Youth and Teens
- Workforce Development / Skills Training
- Public Safety / Crime Prevention



- Mental Health Services
- Services for the Homeless

These needs align with information gathered from the various consultations that were conducted as well as other Community Needs Assessments and the Peace in Motion: Toledo's Path to Community Safety. Importantly, the City of Toledo has invested \$6 million in 322 youth summer programs for the 2022-2024 calendar years, with another \$1.25 million to be invested for the summer of 2025. These programs are primarily offered by youth agencies, funded (in part) by the city.



	Definition	No Need	Low Need	Medium Need	High Need
<b>Elderly</b>	Programs or services for the elderly and frail elderly	3.8%	12.0%	37.8%	46.4%
<b>Adult Ed</b>	Adult education / workforce training classes	4.6%	11.6%	34.9%	48.8%
<b>Financial literacy</b>	Financial literacy programs	5.0%	11.4%	26.3%	57.3%
<b>Domestic Violence</b>	Services for victims of domestic violence	4.5%	12.5%	35.9%	47.1%
<b>Healthcare</b>	Healthcare services	4.6%	12.5%	30.3%	52.7%
<b>Homeless</b>	Supportive housing for the homeless	6.2%	10.9%	27.8%	55.1%
<b>Food pantries</b>	Emergency food assistance / food pantries	5.1%	12.3%	33.5%	49.1%
<b>Veterans</b>	Programs and services for Veterans	5.5%	12.4%	34.2%	47.9%
<b>Transportation</b>	Transportation services	5.5%	13.0%	31.5%	49.9%
<b>Physical Disabilities</b>	Services for individuals with physical disabilities	4.6%	14.5%	41.6%	39.4%
<b>Formerly Incarcerated</b>	Services for the formerly incarcerated	8.8%	12.4%	31.0%	47.7%
<b>Developmental Disabilities</b>	Programs for individuals with developmental disabilities	4.2%	17.2%	39.0%	39.6%
<b>Legal services</b>	Legal services	7.2%	14.4%	33.1%	45.3%
<b>Home Buyer Ed</b>	Homebuyer education classes	6.7%	15.6%	30.5%	47.1%
<b>Alcohol/drugs</b>	Alcohol and substance abuse counseling services	6.8%	18.8%	34.6%	39.7%
<b>Fair housing</b>	Fair housing programs (to uncover evidence of discrimination in housing)	10.1%	18.1%	28.2%	43.7%
<b>Literacy/ESL</b>	English literacy programs	7.3%	24.0%	35.5%	33.3%
<b>Migrants</b>	Services for immigrants	14.5%	20.6%	32.7%	32.1%

	Definition	No Need	Low Need	Medium Need	High Need
<b>HIV/AIDS</b>	Housing for persons living with HIV/AIDS and their families	13.0%	29.6%	34.3%	23.0%

**Data Source:** CEW Advisors, Inc. Housing & Community Development Survey

*How were these needs determined?*

As part of the consultation and citizen participation processes, CEW Advisors solicited information from community-based organizations, social service providers, relevant municipal staff, and Toledo residents to identify the most important community needs, neighborhood concerns, and public facilities. Public service needs were collected in several ways: through the online community needs survey, through citizen participation discussions and focus groups, and through review of additional community needs assessments.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The City of Toledo has a total of 118,508 occupied housing units and 14,605 vacant units based on the 2019-2023 American Community Survey, representing a vacancy rate of a little over 11%. In total, 52.7% of the housing units in Toledo are homeownership units, while 47.3% of units are rental units.

With the decline in population in Toledo, there has been a historic decline in demand for housing in the city, resulting in a significant amount of vacant and abandoned property. Even though there has been a decline in population, housing prices and rental costs have escalated dramatically over the course of the past decade, with the pandemic buying spree pushing prices up even more. The median home value in Toledo grew from \$83,600 in 2013 to \$107,000 in 2023, an increase of 28%. The escalation in prices has increased the housing cost burden for Toledo families, with the lowest income households feeling the impacts most acutely.

The City of Toledo has a significant supply of older housing units, with 91.4% of owner-occupied and 75.2% of renter-occupied housing was built prior to 1980. According to the 2017-2021 CHAS data, 86.0% of Low or Moderate Income Households (66,040 total households) live in units built before 1980, putting them at risk for lead-based paint exposure. Of these households, 9,800, or 12.8% of all LMI households in Toledo have children present. In Lucas County in 2023, there were a total of 6,865 total kids under the age of 6 tested for lead and 337 children tested positive for elevated blood levels, an incidence level of 4.91%. This is one of the highest rates in the state of Ohio and is due to the significant number of homes built prior to the 1978 lead paint ban in need of rehabilitation.

Some of the most significant home repair needs are roofing repairs, window replacement, exterior paint and siding, porches and foundations, and heating and electrical system. Notably, this does not account for the significant interior rehabilitation needs which are often needed but are invisible from the exterior.

Lucas Metropolitan Housing (LMH) owns, manages, and maintains 2,592 units of public housing in and around the city of Toledo. The housing developments owned and operated by LMH are located across the city and take a variety of forms, from low-rise and scattered site developments to high-rise buildings. LMH also administers 4,494 Housing Choice Vouchers.

The primary Special Needs populations in Toledo that need supportive housing needs include the elderly and frail elderly, persons with disabilities, individuals with alcohol or other drug addiction, and victims of domestic violence. These supportive housing needs are each described more fully below.

Economic development activities in Toledo are concentrated primarily along the city’s major roads, in neighborhood retail centers, in traditional industrial and office parks, and in the City’s Waterfront District. The largest economic sectors in Toledo are Health Care & Social Assistance, Finance & Insurance, Manufacturing, Retail Trade, and Accommodation & Food Services. Almost two-thirds of all employed Toledo residents work in these economic sectors.

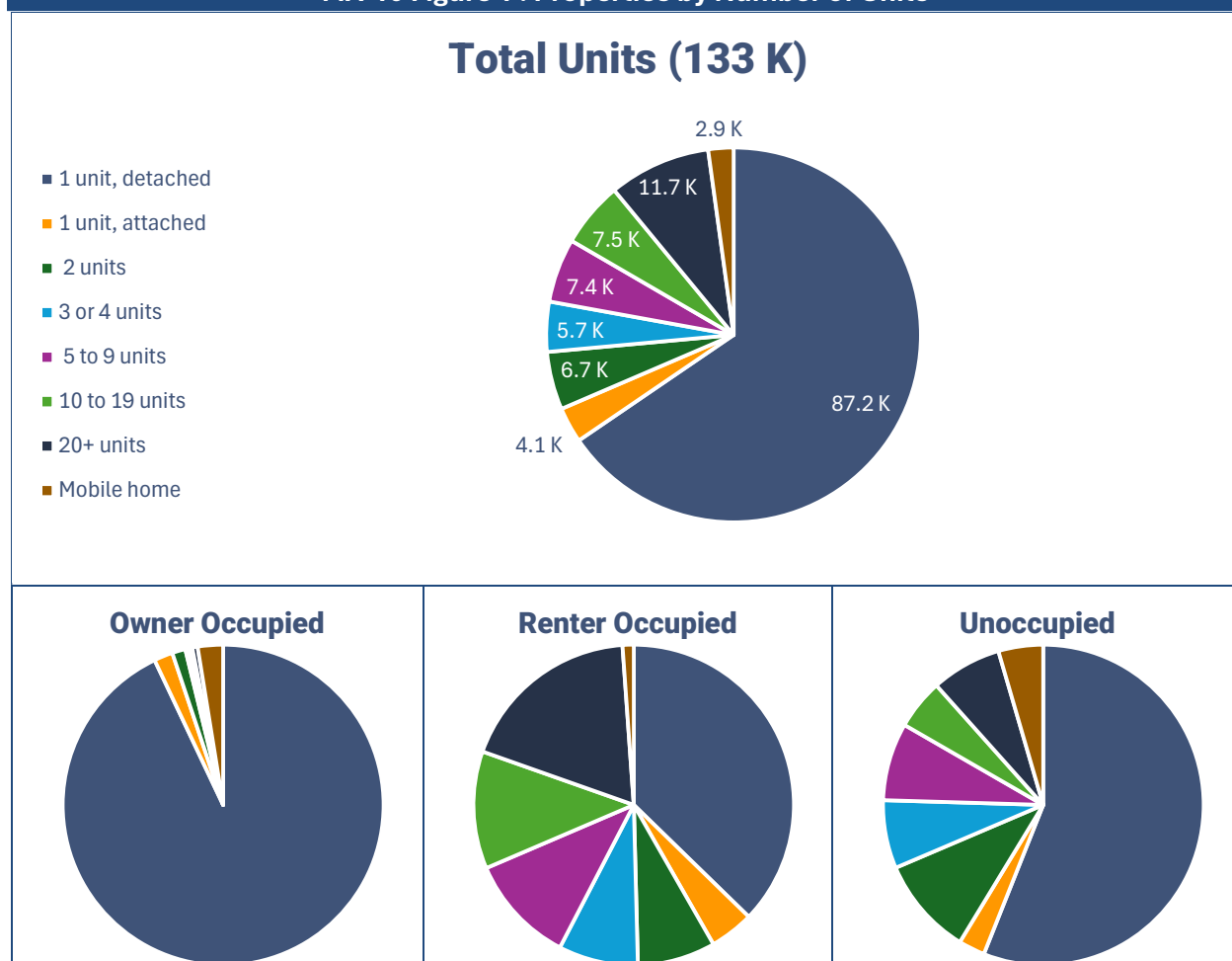
# MA-10 Number of Housing Units - 91.210(a)&(b)(2)

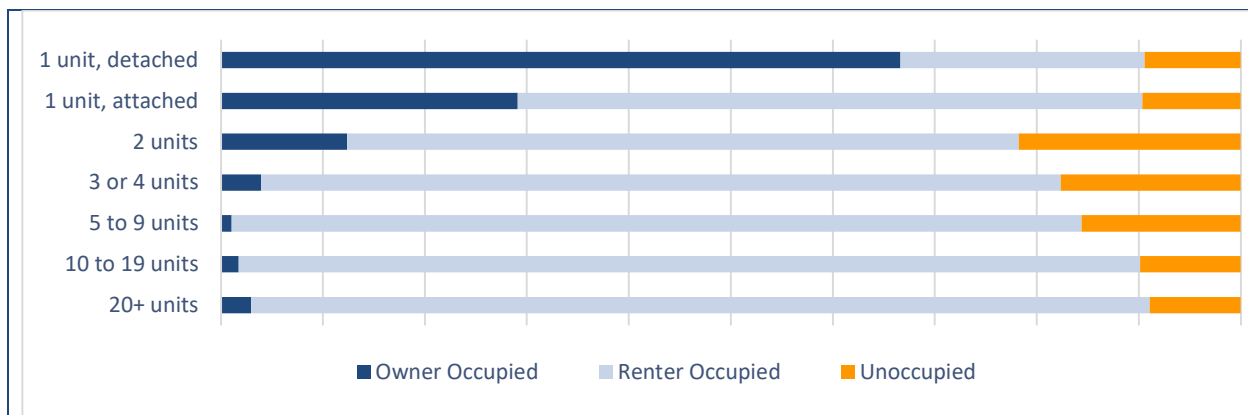
## Introduction

The City of Toledo has a total of 118,508 occupied housing units and 14,605 vacant units based on the 2019-2023 American Community Survey, representing a vacancy rate of a little over 11%.

Single-family and two-unit homes comprise 83% of the housing stock in Toledo. 65.5% of all the housing units in Toledo are single-family detached homes, followed then apartment complexes with 20 or more units (8.8%) and buildings with 10-19 units (5.6%). Of the 87,181 single-family detached homes in Toledo, 66.6% of them are occupied by homeowners, 23.9% are occupied by renters, and 9.4% are unoccupied. Conversely, the large complexes are primarily occupied with renters. Of the 19,240 units in complexes with 10 or more units, almost 88.2% of all units are occupied by renters, 2.5% are occupied by homeowners, and 9.3% are unoccupied.

MA-10 Figure 1 : Properties by Number of Units





	Owners		Renters		Unoccupied		Total	
	#	%	#	%	#	%	#	%
<b>1 unit, detached</b>	58,102	93.0%	20,849	37.2%	8,229	56.0%	87,181	65.5%
<b>1 unit, attached</b>	1,193	1.9%	2,511	4.5%	396	2.7%	4,100	3.1%
<b>2 units</b>	825	1.3%	4,386	7.8%	1,450	9.9%	6,661	5.0%
<b>3 or 4 units</b>	226	0.4%	4,492	8.0%	1,012	6.9%	5,730	4.3%
<b>5 to 9 units</b>	79	0.1%	6,133	11.0%	1,150	7.8%	7,362	5.5%
<b>10 to 19 units</b>	132	0.2%	6,644	11.9%	741	5.0%	7,517	5.6%
<b>20+ units</b>	349	0.6%	10,329	18.4%	1,045	7.1%	11,723	8.8%
<b>Mobile home</b>	1,596	2.6%	625	1.1%	663	4.5%	2,884	2.2%
<b>Boat, RV, van, etc.</b>	0	0.0%	37	0.1%	0	0.0%	37	0.0%
<b>Total</b>	62,502		56,006		14,686		133,195	

Data Source: 2018-2022 ACS - B25032, DP04

## Recent and Upcoming Developments

Based on the ACS, there are approximately 6,839 **fewer** housing units in Toledo compared to 2010. Supplementing this, there are several major developments that have been recently completed or are in the process of development throughout the city. These housing developments will create approximately 1,875 units of new housing, including market-rate, affordable, senior housing,

public housing, and permanent supportive housing.<sup>3</sup> These recent and upcoming developments include the following:

- Fort Industry Square: a mixed-use development spanning an entire city block completed in 2022 includes commercial and restaurant space and 85 units of luxury studio, one-bedroom, two-bedroom, and two-story loft apartments.
- The Overmyer: an 8-story historic redevelopment located in the Warehouse District completed in 2024, featuring 75 furnished or unfurnished 1-bedroom luxury rental units and 2,500 square feet of commercial space to the downtown market.
- Colony Lofts: a 262-unit apartment community completed in 2025 offering one-and two-bedroom luxury apartments, fitness center, business center, restaurant, clubhouse and coffee bar.
- Secor Senior Lofts II: affordable independent living senior housing development with 50 one- and two-bedroom rental units for individuals aged 55 and older. Broke ground on the \$10 million Secor Senior Lofts II project in West Toledo that will create 50 affordable apartments for seniors. The project comes on the heels of a very successful first phase, which created 58 affordable senior apartments that was completed leased within two months opening.
- The Barber-Farris Building: an adaptive reuse of a wholesale produce business into 8 housing units and commercial spaces completed in 2024.
- The Glen and The Grand: The 70 unit development project broke ground in 2025. These affordable housing developments are located at two locations. The Glen will offer 50 one and two-bedroom apartments with rent starting at under \$800 per month. The Grand consists of 20 three and four-bedroom townhomes with rent starting at just over \$1,000 per month. The units will be targeting housing making between 50% and 70% Area Median Income.
- Collingwood Green Phase V: Lucas Metropolitan Housing is redeveloping a formerly blighted corner to expand its portfolio of public housing at Collingwood Green to include 75 affordable rental units for seniors aged 62 and older with incomes between 50% and 70% Area Median.
- Four Corners Project: The Lucas County Land Bank is working with a project team for a \$180 million redevelopment of the Spitzer and Nicholas buildings at downtown's Four Corner. The project is still securing the total funding needed but will create approximately 360 units of housing with 30% of units reserved for individuals earning up to 80% of the area median income.

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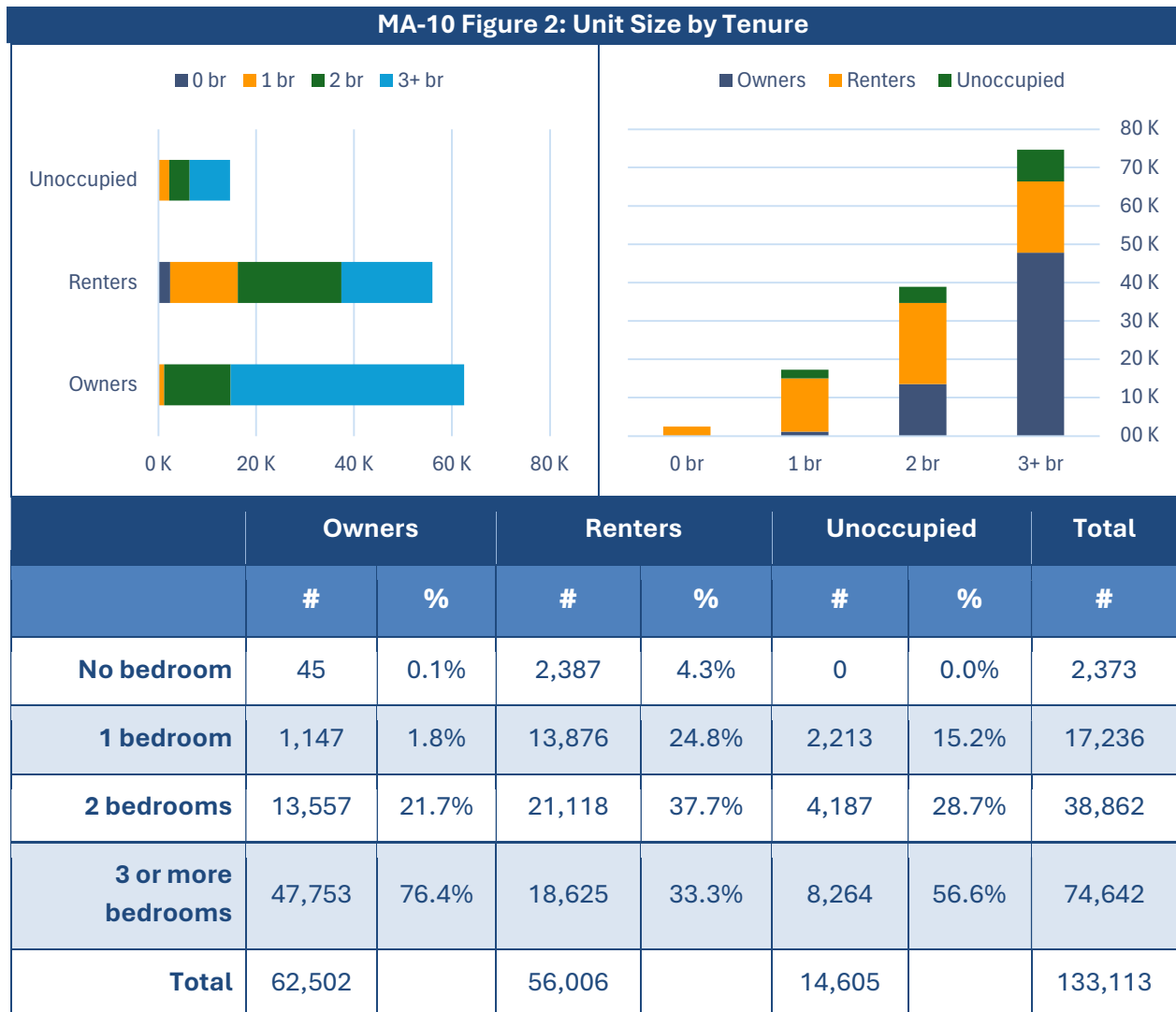
<sup>3</sup> <https://cdn.toledo.oh.gov/uploads/documents/SOTC-25-Print.pdf>



- **Park Hotel Apartments:** started in 2023, the project involves the redevelopment of the blighted former Park Hotel to create 45 units of affordable rental housing for young adults aged 18 to 25 who are aging out of foster care. Project is expected to be completed in 2025.
- **Tower on the Maumee:** half of the building was converted to 106 units of residential housing units in 2017. The top half of the building was recently announced to be converted into additional residential (instead of the planned commercial space), bringing an additional 91 units.
- **Burt's Theater:** A comprehensive redevelopment project which will transform the historic building Burt's Theater into a mixed-use space with retail on the ground floor and 15 residential apartments on the upper floor. Project is currently under construction.
- **Heather Cove Villas:** 28-unit market-rate homeownership villa community designed for residents aged 55 and over. Each unit is designed with two bedrooms and two full bathrooms. The project is currently under construction.
- **Toledo Place Apartments:** Currently under construction on the \$15 million Toledo Place Apartment project in West Toledo by the Inverness Club that will create 192 apartments.
- **Okun Produce:** Substantial redevelopment and preservation of the historic Okun Produce Building, transforming the building into a mixed-use space that will include 14 residential units, commercial spaces, and community amenities. The project is currently under construction.
- **Mission Point:** Collaborative effort between Cherry Street Mission and Lucas Metropolitan Housing (LMH) to address homelessness in the community. The project involves the construction of a four-story multi-family housing development with 65 one-bedroom apartments, a covered outdoor patio space, community space, laundry facilities, and office space for staff. Construction is anticipated to begin in 2026.
- **Arlington Senior Housing:** The Area Office on Aging of Northwest Ohio, in collaboration with National Church Residences, has initiated plans to construct 68 units of affordable housing for seniors.
- **Warren Commons:** This project is a four-story, 60-unit permanent supportive housing community developed to assist individuals experiencing homelessness. The development offers fully furnished one-bedroom apartments for residents.
- **Brailey Apartments:** The development project includes 204 units of rental housing across six three-story buildings on these two sites. The development will feature one- and two-bedroom market-rate units.
- **Central and Upton Ave.:** The mixed-use development of an 11-acre lot south of Central Avenue between ProMedica Parkway and Upton Avenue includes 260 apartments, as well as a restaurant, a flower shop, and a clubhouse.
- **Webster School Redevelopment:** The project is the redevelopment of the three-story former school building into a multi-family residential complex for 86 units of senior housing.
- **Village on the Green:** Mixed-use residential development revitalizing almost four-acres in UpTown Toledo. The project will feature two L-shaped, four-story apartment buildings with 152 units between them and six townhouses in a separate development. The development

will also include more than 14,000 square feet of commercial retail space. Twenty percent of the units will be allocated for low-income residents.

In total, 52.7% of the housing units in Toledo are homeownership units, while 47.3% of units are rental units. Homeownership units are larger than rental units, with 76.4% of all owner units having three or more bedrooms, and another 21.7% having two bedrooms. There are very limited numbers of studios and one-bedroom units that are homeownership units. Comparatively, 24.8% of renter units are one-bedroom units, and another 4.3% are studio apartments. Another 37.7% of rental units are two-bedroom units, and 33.3% of rental units are larger homes with three or more bedrooms.



Data Source: 2018-2022 ACS - B25042, DP04

## Vacancies

Vacancy rate for 2023 stood at 11%, which is down from 2010 where the vacancy rate stood at 14%. Toledo's vacancy rate is much higher than the national average as well as other cities

throughout the state of Ohio. High vacancy rates typically suggest several underlying trends of a weak housing market, with higher vacancy rates signaling a potential housing surplus or lower quality housing stock. Toledo's high vacancy rate signals a deeper supply-demand imbalance which stems from a substantial population decline of approximately 100,000 people over the past 50-55 years, a decline of about 1/3 of the city's population. The city's high vacancy rate contributes to declining property values and neighborhood destabilization as well.

*Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.*

According to all available information, there are 10,644 subsidized affordable housing units in Toledo. These units target low- and moderate-income individuals earning less than 80% of the Area Median Income. These units use a variety of funding subsidies that target specific population groups for housing, including elderly, individuals with disabilities, formerly homeless, and family housing units. There are 4,514 units reserved for the elderly and those living with disabilities. Another 3,610 units are for families.

Table 4 - List of Subsidized Housing Units in Toledo		
Property Name	Assisted Units	Target Population
ACCESSIBLE COUNTRY TRAIL	24	Disabled
ACCESSIBLE COUNTRY TRAIL II	16	Disabled
ADAMS STREET DEVELOPMENT	31	Family
AHEPA 118	50	Elderly
ALPHA TOWERS	165	Elderly
ARLINGTON BY THE LAKE	50	Elderly
ASHLAND MANOR	146	Elderly
AUTUMN WOOD VILLAGE II	42	Family
BRIARWOOD OF TOLEDO	100	Family
BRIDGE POINT SENIOR VILLAGE	11	Elderly
BROOKVIEW GARDENS	16	Disabled
BYRAM PROPERTIES	15	Family
BYRNEPORT APARTMENTS	100	Family
CENTRAL 1 AMP 131	482	Public Housing
CENTRAL 3 AMP 133	322	Public Housing
Chestnut Hill Apartments	37	Disabled
CITY FORREST OF TOLEDO	70	Family
COLLINGWOOD GREEN PHASE 1	65	Elderly or Disabled
COLLINGWOOD GREEN PHASE II	68	Elderly or Disabled
COLLINGWOOD GREEN PHASE III	55	Family
COMMODORE PERRY APARTMENTS	63	Family
COMMONS AT GARDEN LAKE	75	Disabled
COUNTRY CREEK APARTMENTS	229	Family
COVENANT HOUSE	156	Elderly
CRANES LANDING	40	Elderly
DOUGLAS SQUARE APARTMENTS	40	Family
DOVES MANOR	49	Elderly
EAST 1 AMP 121	422	Public Housing

EAST 2 AMP 122	495	Public Housing
ENGLEWOOD SENIOR HOUSING	38	Elderly or Disabled
ESSEMAR SENIOR APARTMENTS	51	Elderly
FRANKLIN VILLAGE SENIOR HOMES	40	Elderly
FRISCH PROPERTIES	10	Family
GARDEN VIEW ACRES	63	Family
GREENBELT APARTMENTS	176	Family
GREENVIEW GARDENS	120	Disabled
HAMPTON COURT	48	Family
HEATHERGATE PARK APARTMENTS	168	Family
HIGHLAND CREST APARTMENTS	20	Family
HILLCREST APARTMENTS	56	Family
HILLTOP VILLAGE	90	Family
HOPE MANOR	101	Elderly
IDE APARTMENTS II	17	Disabled
IDE CENTER APARTMENTS	8	Disabled
JOHN H MCKISSICK SENIOR APARTMENTS	12	Elderly
KEYGATE MANOR	58	Elderly
Legacy Hills	18	Family
LEGACY HOMES	40	Family
LIVING STREAM	5	Disabled
LUTHER CREST	71	Elderly
LUTHER GROVE	51	Elderly
LUTHER WOODS	52	Elderly
MACYS APARTMENTS	65	Family
MADONNA HOMES	171	Elderly
MAUMEE HOUSE	8	Disabled
MERCY OUTREACH MINISTRIES IV	12	Disabled
MICHAELMAS MANOR	94	Elderly or Disabled
MOODY MANOR	119	Family
Museum Place	13	Family
NEW CHENEY FLATS	45	Family
NEW HERITAGE VILLAGE I	250	Elderly
NEW TOWN	100	Family
NORTH RIVER HOMES I	49	Elderly or Disabled
NORTH TOWNE VILLAGE	70	Family
NORTHGATE APARTMENTS	230	Elderly
NORWICH APARTMENTS	77	Family
OAKWOOD GARDENS	168	Family
OAKWOOD HOMES I	40	Elderly or Disabled
OAKWOOD HOMES II	40	Elderly or Disabled
OAKWOOD HOMES III	16	Elderly or Disabled
OAKWOOD HOMES IV	35	Elderly or Disabled
OBLATE RESIDENCES	100	Elderly
ONTARIO PLACE HOMES	19	Family
OTTAWA COVE APARTMENTS	100	Family
OTTAWA HOUSE	8	Disabled
OTTAWA RIVER ESTATES	14	Disabled

PALMER GARDENS	75	Family
PARQWOOD APARTMENTS	134	Elderly
PELHAM MANOR	101	Elderly
Pilgrim Port	4	Elderly or Disabled
PILGRIM PORT	50	Elderly
PINEWOOD PLACE	99	Elderly
PONTIAC PLACE HOMES	11	Family
REGINA MANOR APARTMENTS	180	Family
Renaissance Senior Apartments	49	Elderly
RENAISSANCE SENIOR APARTMENTS	55	Elderly or Disabled
RENASCECE OTTAWA AREA RESIDENCES	47	Family
RIVERFRONT APARTMENTS	113	Elderly or Disabled
Sawyer Rd.	12	Family
SCHLEICHER HOMES V	12	Disabled
SECOR SENIOR LOFTS	58	Elderly
SOUTH EAST TOLEDO HOMES II	25	Family
SOUTH TOLEDO HOMES	18	Family
SOUTH TOLEDO HOMES II LTD NHS	4	Family
SOUTHBRIDGE SQUARE APARTMENTS	243	Family
SOUTHEAST TOLEDO HOMES	28	Family
SOUTHGATE WOODS APARTMENTS	100	Family
ST HEDWIG SENIOR HOUSING	38	Elderly or Disabled
St. Hedwig Apartments	17	Elderly
STEWART APARTMENTS	8	Disabled
SWAN COVE	76	Family
SYLVANIA SENIOR RESIDENCE	51	Elderly or Disabled
Terrace Downs	11	Family
THE LAKEWOODS	89	Elderly
THE LAKEWOODS PHASE II	48	Elderly or Disabled
THE LAKEWOODS PHASE III	42	Elderly or Disabled
THE OAKS	20	Disabled
THE PLAZA	159	Elderly or Disabled
The Residenz at Sylvania	5	Elderly
TOLEDO ELDERLY I	7	Elderly
TOLEDO HOMES	48	Family
TOLEDO HOMES II	38	Family
TOLEDO OLDE TOWNE COMMUNITY	8	Family
TOTCO HOMES	30	Elderly or Disabled
Tudor Arms Apartments	14	Family
UNITED NORTH SCHOOL HOMES	24	Family
UNITED NORTH SCHOOL HOMES II	24	Family
UPTOWN ARTS APARTMENTS I	31	Elderly or Disabled
Valley Bridge Senior Apartments	70	Elderly or Disabled
VISTULA HERITAGE VILLAGE II	165	Elderly or disabled
VISTULA HERITAGE VILLAGE II	250	Elderly
W Sylvania Ave	15	Family
WARREN SHERMAN FLATS	55	Family
WATERFORD	64	Elderly or Disabled

WATERFORD II	74	Elderly or Disabled
WEST 1 AMP 111	359	Public Housing
WEST 2 AMP 112	440	Public Housing
WESTLAND GARDENS	100	Family
WILLARD APARTMENTS	15	Family
Willow Crest	20	Family
WOODRUFF VILLAGE	96	Family
WOODSIDE VILLAGE	12	Disabled
Scattered Site Family Homes	113	Family

**Date Sources:** Toledo Department of Housing and Community Development, National Housing Preservation Database

Toledo has 10,644 subsidized affordable housing units that target low- and moderate-income individuals earning less than 80% of the Area Median Income. These units utilize various funding subsidies targeting specific population groups, including elderly, individuals with disabilities, formerly homeless, and families.

The subsidized housing inventory includes 4,514 units reserved for elderly residents and those living with disabilities, while 3,610 units serve families. Major developments include public housing complexes such as Central 1 AMP 131 (482 units), East 2 AMP 122 (495 units), and West 2 AMP 112 (440 units), along with numerous smaller developments serving specific populations.

Lucas Metropolitan Housing (LMH) owns, manages, and maintains 2,592 units of public housing in and around the city of Toledo. The housing developments owned and operated by LMH are located across the city and take a variety of forms, from low-rise and scattered site developments to high-rise buildings. The developments tend to be older, with some properties dating back to the 1930s. As such, their physical condition varies.

LMH also administers 4,494 Housing Choice Vouchers. The current utilization of LMH's vouchers is 3,927 as of October 2024, resulting in a leasing percentage of 87.4%. Unfortunately, LMH is unable to distribute these unused HCVs due to the agency reaching its budget authority cap. This happens when private market rents increase and the housing authority needs to increase its allocation amount to support the continued residency of housing choice voucher holders.

Among these vouchers, 275 are Non-Elderly Disabled Vouchers (of a total of 300), and 42 are Family Unification Program Vouchers (of a total of 46). There are 504 vouchers for disabled residents and 170 Veterans Affairs Supportive Housing (VASH) vouchers used to support affordable housing for Veterans. The total budgetary authority for 2024 was \$29,292,045.

The Public Housing waitlist has been closed since October 2023, with 1,539 families waiting for housing units and approximately 300 families turning over annually. The HCV waitlist has been closed since 2019, limiting access to assistance for private rental market units.

*Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.*

Based on a comprehensive review of Toledo's affordable housing inventory, there are approximately **1,533 units** that will reach their period of affordability during the 2025-2029 Consolidated Plan period and are at risk of being lost from the affordable housing inventory.

These at-risk units include many single-family homes that were assisted with HOME funds, as well as several developments financed through both 4% and 9% Low-Income Housing Tax Credit (LIHTC) projects. The expiration of affordability periods for these properties represents a significant potential loss to Toledo's affordable housing stock.

However, there is potential for preservation of some of these units. Tax credit projects may be eligible for re-subsidization to extend their affordability periods beyond the initial compliance term. This strategy could help maintain these units as affordable housing options for low- and moderate-income residents.

The potential loss of 1,533 affordable units is particularly concerning given Toledo's existing housing challenges, including long waitlists for public housing and Housing Choice Vouchers. The Public Housing waitlist has been closed since October 2023 with 1,539 families waiting, while the HCV waitlist has been closed since 2019. Losing additional affordable units would further exacerbate the shortage of housing options for low-income residents.

The city will need to develop strategies to preserve these at-risk units through refinancing, re-subsidization, or other preservation mechanisms to prevent further reduction in the affordable housing inventory. Given Toledo's population decline and existing housing challenges, maintaining the current stock of affordable units is critical to meeting the needs of low- and moderate-income residents.

*Does the availability of housing units meet the needs of the population?*

When comparing the total number of households to the total number of housing units, Toledo has sufficient housing units to accommodate the city's residents. However, this numerical adequacy does not translate to meeting actual housing needs due to several critical factors.

Toledo has experienced significant population decline over the past 55 years, losing approximately 100,000 people (about one-third of the city's population), which has left the city with an oversupply of housing units. Many of these units have been vacant for extended periods, and due to lack of regular maintenance, these properties have fallen into significant disrepair, adding to the city's affordability challenges.

The housing stock, especially vacant units, requires substantial rehabilitation to make them high-quality homes suitable for occupancy. Toledo's vacancy rate stands at 11%, much higher than the national average and other Ohio cities, indicating a weak housing market with potential housing surplus or lower quality housing stock.

More critically, there remains a significant mismatch between available housing that is affordable to households at different income levels and demand for housing at those price points. The most profound need is for housing that is affordable at all income levels, as housing cost burden affects the majority of Toledo residents.

There is extremely high demand for affordable housing, evidenced by very long waiting lists. The Public Housing waitlist has been closed since October 2023 with 1,539 families waiting, and the HCV waitlist has been closed since 2019. Additionally, there is limited supply of accessible units for disabled residents and seniors needing housing accommodations.

While Toledo has adequate housing units numerically, the quality, affordability, and accessibility of available housing does not meet the population's actual needs.

*Describe the need for specific types of housing:*

The most profound need in Toledo is an increase in housing that is affordable at all income levels. Housing cost burden, defined as spending greater than 30% or 50% of total income on housing, is the most significant housing problem in Toledo, consistent with most municipalities throughout Ohio.

There is a high demand for affordable housing with very long waiting lists for public housing units and housing choice vouchers. The Public Housing waitlist has been closed since October 2023, with 1,539 families waiting for housing units. Approximately 300 families turnover on the waitlist annually on average. The HCV waitlist has been closed since 2019, limiting access to assistance for housing units in the private rental market.

Toledo has a critical need for accessible housing for disabled residents and seniors requiring accommodations. With 21,537 Toledo residents (8.7%) experiencing difficulty walking or climbing stairs and 15,029-22,858 residents (6.1%-9.2%) having self-care and/or independent living difficulties, there is insufficient truly accessible housing. The city's housing stock, dominated by multi-level and ranch-style homes, poses challenges for those with mobility limitations. Several thousand residents are estimated to struggle in housing units lacking required accessibility elements and amenities.

There is significant need for in-home modifications, regular property maintenance, and in-home supports to allow individuals to age in place and minimize and delay the transition to assisted living and nursing home care.

Toledo lacks smaller homeownership opportunities. While there are options for smaller-sized rental units, studio and one-bedroom apartments, there are very limited homebuyer opportunities for these smaller sized units. There could be a significant demand for these types of units considering that they would be less expensive units to purchase for new homebuyers, younger adults, seniors, and smaller families.



## **Discussion**

The City of Toledo has struggled due to significant population decline for more than 50 years. Residents of Toledo continue to experience the legacy of population decline and property vacancy and abandonment. Stakeholders in Toledo have expressed a desire to see demonstrable change throughout the city, focusing on improvements to the housing stock and neighborhoods which will in turn improve the lives of individuals and families. Existing homes pose significant health and safety hazards, and few new homes have been built in the city, including those that could provide alternatives for seniors who wish to downsize or age in place and new residents to locate into the city limits. It is increasingly difficult for Toledo residents to become homeowners. There is a need for more high-quality, safe, affordable housing options that would help families and households live the kind of life they deserve. This burden falls hardest on those with the lowest incomes, seniors, Black households, and single parents, who face housing instability at higher rates than the average Toledoan.

# **MA-15 Housing Market Analysis: Cost of Housing**

## **- 91.210(a)**

### **Introduction**

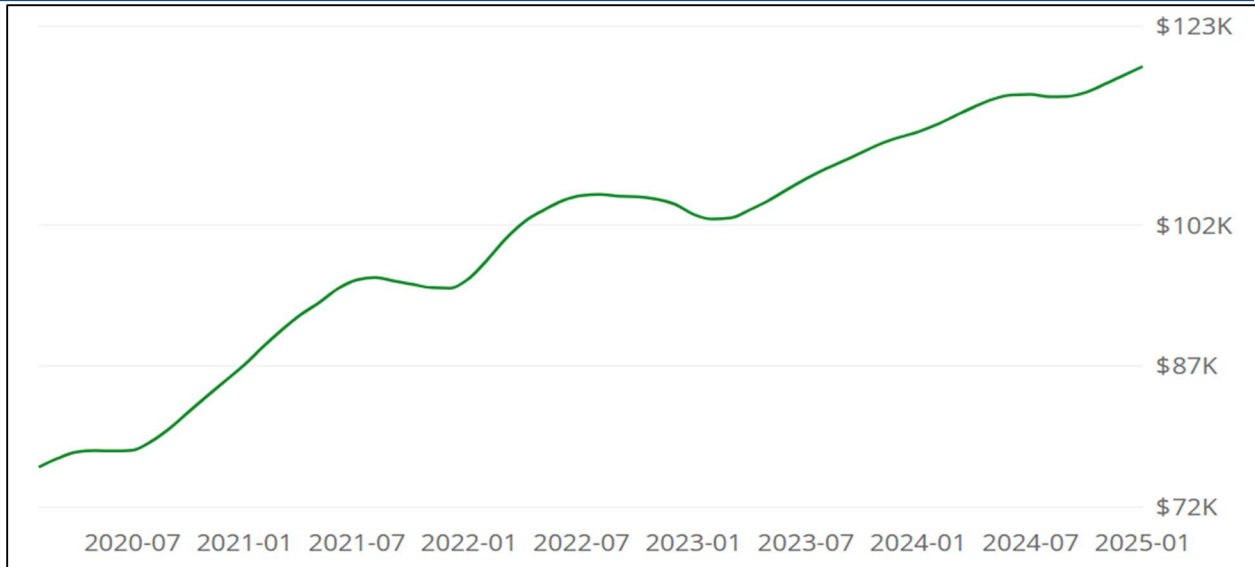
While safe and affordable housing is a basic human need, it also represents the single largest expenditure for most households. The following section provides information on the cost of rental and owner-occupied housing in the City of Toledo, focusing specifically on housing affordability for low- and moderate- income households.

Over the past 8-10 years, rental prices in Toledo have grown by approximately 42% according to the American Community Survey data. It should be noted that this data does not account for the recent rental price increases that have occurred in 2024 and 2025. While rental price increases correspond with an increase in median wage, wage growth during this time has been slightly slower than the growth of rental prices, thus rental housing has become somewhat less affordable over time.

Home values witnessed a significant decline during the 2010 – 2016 period resulting from the housing market crash of 2008. Toledo saw home values plummet, returning close to the price point prior to the pre-2008 housing market bubble. This offered homebuyers a respite as household wages largely remained stable while home values declined by 19.4%. Home values stabilized in the mid-2010s then started increasing in the late 2010s. With the onset of the COVID-19 pandemic, home values saw a sharp increase, rising by 28% between 2020 and 2023. As of January 2025, the median sale price for homes in Toledo reached \$119,000, marking another 6.2% increase from the previous year according to housing market sales data from Zillow. Homes typically remain on the market for about 47 days before being sold, with the average homes moving to pending sale after only 10 days.

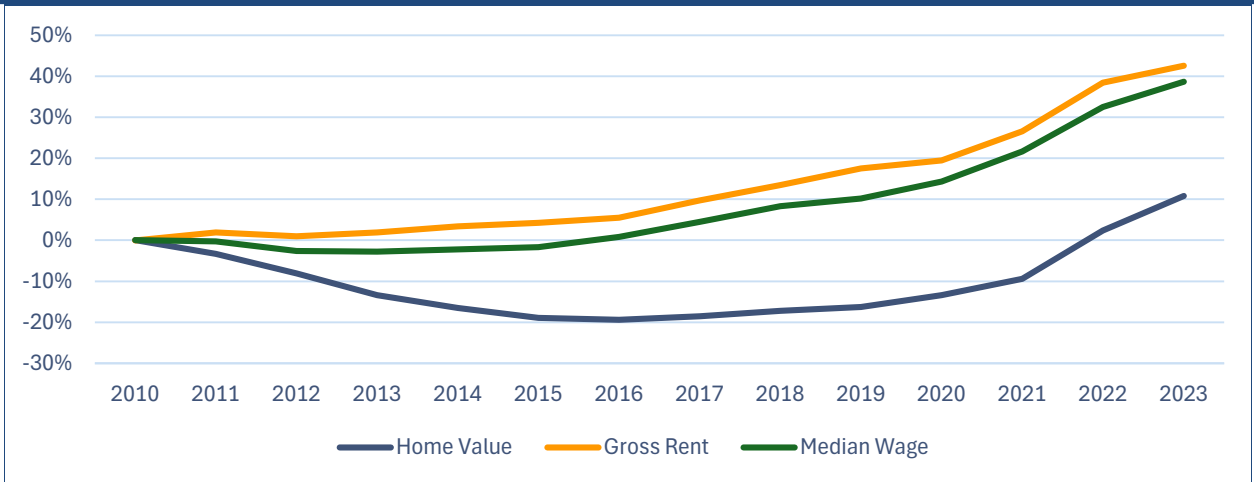
While the city has seen a sharp increase in home values over the past several years, Toledo's housing market is relatively affordable when compared to other nearby municipalities in Ohio and Michigan. This phenomenon has attracted interest in out-of-state investors looking for additional real estate investment opportunities. However, the relatively low home acquisition cost of housing in Toledo often does not truly reflect the rehabilitation needs of the housing units which can be significant. Anecdotally, there are many instances of property in Toledo being valued lower than the acquisition and rehabilitation cost. This significantly depresses the likelihood of rehabilitation in the City, even among homeowners.

Figure 4 - Toledo Home Sale Prices, 2020 - 2025



Data Source: Zillow Home Value Index

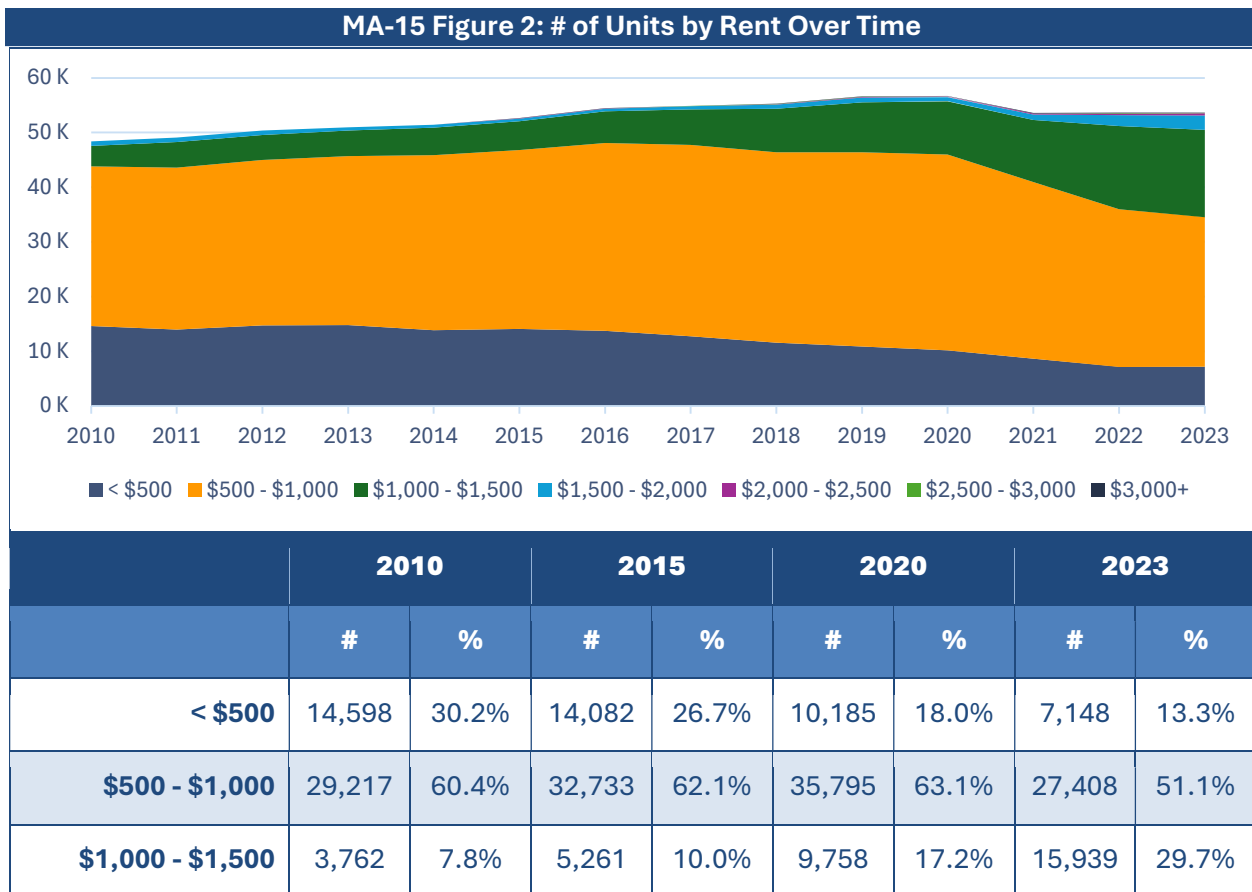
MA-15 Figure 1: Home Price, Rent, and Wage Change Since 2010



	Home Value		Gross Rent		Median Wage	
	\$	% Δ	\$	% Δ	\$	% Δ
2010	\$96,500	n/a	\$617	n/a	\$34,260	n/a
2011	\$93,300	-3.3%	\$629	1.9%	\$34,170	-0.3%
2012	\$88,700	-8.1%	\$623	1.0%	\$33,374	-2.6%
2013	\$83,600	-13.4%	\$629	1.9%	\$33,317	-2.8%
2014	\$80,600	-16.5%	\$638	3.4%	\$33,485	-2.3%

	Home Value		Gross Rent		Median Wage	
2015	\$78,200	-19.0%	\$643	4.2%	\$33,687	-1.7%
2016	\$77,800	-19.4%	\$651	5.5%	\$34,548	0.8%
2017	\$78,600	-18.5%	\$677	9.7%	\$35,808	4.5%
2018	\$79,900	-17.2%	\$700	13.5%	\$37,100	8.3%
2019	\$80,800	-16.3%	\$725	17.5%	\$37,752	10.2%
2020	\$83,600	-13.4%	\$737	19.4%	\$39,155	14.3%
2021	\$87,400	-9.4%	\$781	26.6%	\$41,671	21.6%
2022	\$98,800	2.4%	\$854	38.4%	\$45,405	32.5%
2023	\$107,000	10.9%	\$880	42.6%	\$47,532	38.7%

Data Source: 2010-2023 ACS5 - DP03, DP04



	2010		2015		2020		2023	
<b>\$1,500 - \$2,000</b>	782	1.6%	459	0.9%	768	1.4%	2,650	4.9%
<b>\$2,000 - \$2,500</b>	n/a	n/a	65	0.1%	72	0.1%	388	0.7%
<b>\$2,500 - \$3,000</b>	n/a	n/a	14	0.0%	49	0.1%	34	0.1%
<b>\$3,000+</b>	n/a	n/a	57	0.1%	72	0.1%	96	0.2%

Data Source: 2010-2023 AC5 - DP02

Whether people choose to or are forced by circumstances to spend more than 30% of their incomes on housing, they have less disposable income to spend on other necessities such as food, utilities, transportation, childcare, healthcare, etc. They also have limited disposable income to spend at local shops, restaurants, and service providers. The more income a household spends on housing, the less money gets circulated in the local economy. The lower a household's income, the more likely they experience housing cost burden. LMI households (making less than 80% of the Area Median Income) have much higher rates of cost burden than the average household.

In Toledo, about 29% of all LMI households (specifically households with income less than 80% AMI) have a cost burden between 30 and 50%, and another 14.5% have a severe cost burden, spending more than 50% of their income on housing. Thus over 55% of all LMI households have some level of cost burden, significantly limiting the amount of income they have available for other expenses. Further, of all the households that are cost burdened, renters are twice as likely to be cost burdened than homeowners. This is due in large part of the significant number of extremely low income (0-30% AMI) and very low income (30-50% AMI) renters in the city of Toledo.

MA-15 Figure 3: Housing Affordability - Number of Affordable Units by Household Income		
	Renter	Owner
<b>&lt; 30% HAMFI</b>	10,140	No Data
<b>30 - 50% HAMFI</b>	24,965	44,920
<b>50 - 80% HAMFI</b>	20,815	12,465
<b>80 - 100% HAMFI</b>	1,725	1,225
<b>100+% HAMFI</b>	No Data	1,890

Data Source: 2018-2021 CHAS - Tables 14A, 14B, 15A, 15B, 15C

MA-15 Figure 4: Monthly Fair Market Rent					
	0 br	1 br	2 br	3 br	4 br
<b>Fair Market Rent</b>	\$691	\$753	\$986	\$1,307	\$1,378
<b>High HOME Rent</b>	\$691	\$753	\$986	\$1,307	\$1,378
<b>Low HOME Rent</b>	\$691	\$753	\$977	\$1,128	\$1,258
<b>ACS Median Rent</b>	\$664	\$658	\$905	\$1,089	\$1,129

Data Source: 2024 HUD FMR and HOME Rents. 2019-2023 ACS

*Is there sufficient housing for households at all income levels?*

No. While Toledo has a significant number of vacant units and is more affordable than other neighboring communities, it is becoming increasingly more expensive to live in the city. The increases in housing costs put increasing pressure on households. There is a dire need for more affordable housing units for rental and homeownership, as well as more “move-in ready” housing units for individuals with Housing Choice Vouchers. These needs are for all household sizes. Housing costs have seen an increase over the past several years throughout Ohio and Toledo. Toledo is also seeing increasing interest among out of state real estate speculators and developers that is putting upward pressure on prices in the city. As the city struggles with a significant amount of vacant, abandoned, and blighted property throughout the city, there is still a great need for additional affordable units.

*How is affordability of housing likely to change considering changes to home values and/or rents?*

If we examine wages, rents, and home values in Toledo from 2010 to 2023, we see that wage and rent growth has been nearly identical, with rent growth being 42.6% over the period while household wage growth was 38.7%. Thus, rental housing has become somewhat less affordable over time, but at a slow rate. One can assume this trend will continue.

The post-financial crash decade of the 2010s gave homebuyers respite as household wages grew 10.2% while home values declined 16.3%. However, Toledo is not immune to the national housing crisis. In 2021 we see the growth in home prices that began after they bottomed out in 2016 massively accelerate to 22%, exceeding the household wage growth rate of 14% over the same time period. Given the national trends, we would expect home prices to continue rising faster than wages.

So, while homebuying is more affordable for the median Toledo household now than it was in 2010, it is less so than it was in 2021. Affordability will likely continue to decline based on the trajectory of the growth curves for household wages, rents, and home values. Importantly, there is a significant need for additional home repairs when property is purchased to make it a high quality housing unit.

The acquisition price does not fully account for these often costly home repairs. Furthermore, the ACS 5-year data does not completely reflect the recent run-up in housing and rent prices which have been rising much more dramatically than wages recently, especially in 2023 and 2024.

*How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?*

The 2024 HUD Fair Market Rent (FMR) and HOME High Rent amounts are in line with the median rents as estimated by the 2019-2023 American Community Survey. The HOME rents are slightly higher than the median ACS estimates, likely accounting for:

- a) The ACS 5-year data has does not completely reflect the recent run-up in housing prices, and
- b) The latest year of ACS data is from 2023, while the latest year of HOME/FMR data is from 2024.

However, fair market rent is not affordable for a large number of Toledo households. The FMR for a 1-bedroom apartment in Toledo is \$753. This would require a household income of \$2,510 or \$30,120 annually for the unit to be affordable. While the median family income in Toledo is \$47,532 according to the 2023 ACS 5-Year estimate, between 27% (32,127) and 37% (44,223) of households in Toledo would be cost burdened.

Similarly, a 2-bedroom apartment has a HOME high rent of \$986, requiring an annual household income of \$39,440 to meet the definition of affordable. This puts a two bedroom out of affordability range for between 37% (44,223) and 52% (62,133) of Toledo households.

For every bedroom size, the Fair Market Rent is set to be high enough to ensure that holders of Housing Choice Vouchers can access housing units. However, there are many examples of households not able to find a unit because either the rent exceeds the maximum amount of the voucher, or rents in certain more desirable areas of the city are much higher than the area median rent.

MA-15 Figure 5: Households by Income Level		
	#	%
<b>Less than \$10,000</b>	11,298	9.5%
<b>\$10,000 to \$14,999</b>	9,056	7.6%
<b>\$15,000 to \$24,999</b>	11,773	9.9%
<b>\$25,000 to \$34,999</b>	12,096	10.2%
<b>\$35,000 to \$49,999</b>	17,910	15.1%

	#	%
<b>\$50,000 to \$74,999</b>	21,294	18.0%
<b>\$75,000 to \$99,999</b>	13,978	11.8%
<b>\$100,000 to \$149,999</b>	15,012	12.7%
<b>\$150,000 to \$199,999</b>	3,961	3.3%
<b>\$200,000 or more</b>	2,130	1.8%

Data Source: 2019-2023 ACS - DP03

### *Discussion*

The primary takeaway from data research and analysis, community feedback, and the consultation process is that the city is in critically short supply of affordable housing. Home values and rental prices have grown considerably over the past several years since the housing market decline of the late 2000s and early 2010s. And while Toledo is still relatively affordable when compared to other cities in the region, households throughout the city struggle with housing costs. Housing affordability is still the major concern in Toledo. Household incomes for many families in Toledo remain far below what the median or average owner or renter can afford which keeps many entry-level buyers out of the market.

Furthermore, the city struggles with a significant amount of vacant and abandoned housing units. As the city's housing stock continues to age and deteriorate, housing costs rise due to maintenance costs. While federal funds can be leveraged to address housing deterioration and neighborhood revitalization concerns, the level of need far outpaces the resources available. The city must also pursue a strategy of preserving long-term affordable housing that already exists and supporting the production of new affordable housing units to increase the supply for low- to moderate-income families to help reduce housing cost burdens for these Toledo households.



# MA-20 Housing Market Analysis: Condition of Housing - 91.210(a)

## Introduction

Almost three quarters of Toledo’s existing housing stock was built before 1980, reflecting the city’s history massive growth during the industrial and post-war eras of the 20<sup>th</sup> century. Only 9.1% of the total housing units have been built since 2000, excluding the significant new developments that are currently occurring in the city (see **Section MA-10**). The city’s housing stock is significantly aged and there is only limited production of new multi-family housing units.

This section describes the significant characteristics of the existing housing supply, including age and condition, the number of vacant and abandoned units, and the risk posed by lead-based paint.

## Definitions

For this Consolidated Plan, the City of Toledo uses the following definitions for this section:

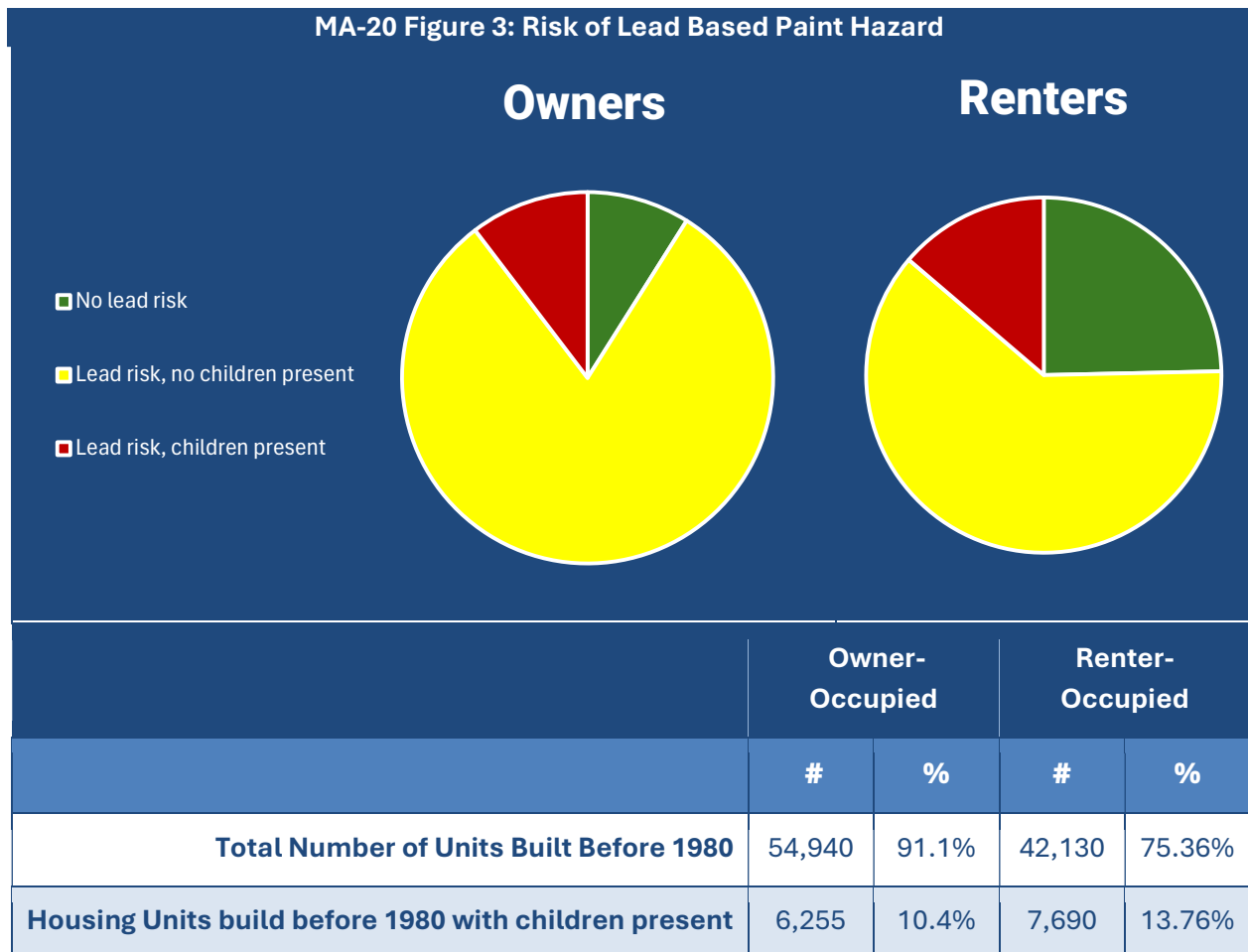
- “Standard condition” – A housing unit that meets HUD Housing Quality Standards (HQS) and all applicable state and local building codes.
- “Substandard condition but suitable for rehabilitation” – A housing unit that contains one or more housing conditions as described in NA-10, contains a lead-based paint hazard, is potentially endangering the health and safety of the occupant, and/or is condemned as unfit for human habitation but is both structurally and financially feasible to rehabilitate.
- “Substandard condition not suitable for rehabilitation” – A housing unit that contains one or more housing conditions as described in NA-10, contains a lead-based paint hazard, is potentially endangering the health and safety of the occupant, and/or is condemned as unfit for human habitation and is not structurally or financially feasible to rehabilitate.

MA-20 Figure 1: Condition of Units				
	Owner-Occupied		Renter-Occupied	
	#	%	#	%
With one selected Condition	12,755	20.4%	23,753	42.4%
With two selected Conditions	197	0.3%	840	1.5%
With three selected Conditions	7	0.0%	61	0.1%
With four selected Conditions	0	0.0%	0	0.0%
No selected Conditions	49,543	79.3%	31,352	56.0%
Total	62,502	100.0%	56,006	100.0%

Data Source: 2019-2023 ACS - B25123

MA-20 Figure 2: Year Unit Built				
	Owner-Occupied		Renter-Occupied	
	#	%	#	%
2000 or later	1,619	2.6%	5,097	9.1%
1980-1999	3,740	6.0%	8,780	15.7%
1950-1979	29,243	46.8%	23,192	41.4%
Before 1950	27,900	44.6%	18,937	33.8%
Total	62,502	100.0%	56,006	100.0%

Data Source: 2018-2022 ACS - B25036



Data Source: 2017-2021 CHAS - Table 13

MA-20 Figure 4: Vacant Units			
	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			14,687
Abandoned Vacant Units			9,417
REO Properties			710
Abandoned REO Properties			

Data Source: ACS 2023 5-Year Estimates, Foreclosures.com

### Need for Owner and Rental Rehabilitation

There is a direct correlation between the age of a home and the need for maintenance and rehabilitation. Typically, after a home reaches 30 or 40 years old it begins to require significant repairs and/or major rehabilitation. This becomes even more problematic if the home wasn't well-maintained throughout. Further, homes in the midwestern United States suffer from additional weather-related problems due to icy weather, heavy snow, and frigid temperatures.

The city has a significant stock of older housing units. The median year that Toledo's housing structures were built is 1955, and 91.4% of owner-occupied and 75.2% of renter-occupied housing was built prior to 1980. Because of the age of the housing stock, there is an ongoing need for housing rehabilitation throughout the city.

Based on consultation with the staff in the city's code enforcement department, the major housing code violations and rehabilitation challenges are related to vacant and abandoned properties, which is driven by the long-term population decline in the city. Among these properties many properties are in severe disrepair, with issues such as roof damage, boarded or missing windows and doors, foundation problems, crumbling stairs and porches, peeling paint and damaged siding, and unsecured building. Additionally, there are many occupied housing units with serious maintenance issues such as peeling paint and exposed wood with lead hazard risk, gutters and downspouts in disrepair, significant roofing problems. There are also significant reports of interior clutter and hoarding, which hinders rehabilitation efforts. These issues seem to be concentrated among senior and low-income households. There are many owner-occupied homes that require assistance for basic repairs, but homeowners often cannot afford them. Additionally, there are homeowners that owe back taxes on their properties and are therefore ineligible for support.

The city received a grant to demolish 1,000 severely dilapidated properties. The properties identified for demolition were based on a survey conducted in 2021 that graded properties from A to F, and those with F ratings were selected for demolition. The demolition process included clearing title work and notifying lien holders, but many properties remain abandoned due to

complex legal processes. Some properties were saved through owner appeal, where owners were required to show a renovation plan and financial proof to avoid demolition.

Lead hazard risks are discussed further below in this section.

Other potential indicators of the need for renovation are the general age of the population, income, and housing cost burden. Those 62 years of age and older represent over 19% of the population. That could mean they are less likely or able to keep up with maintenance or repairs that they may have done before such as painting the exterior of the home. Over 24% of the population are below the poverty level. Toledo has a significant number of households that are housing cost burdened. These factors can have a direct impact on the potential need for renovation due to limiting the ability to keep up with the structure's need because of limited finances and ability to do so.

*Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards*

The age of the City's housing stock places its housing units at a greater risk of potential lead exposure. Lead-based paint was banned for residential use in the United States in 1978 by the U.S. Consumer Product Safety Commission. Infants, toddlers, and preschool-age children are most susceptible to the toxic effects of lead poisoning because they absorb lead more readily than adults and have inherent vulnerability due to developing central nervous systems. Lead exposure, even at very low levels, can cause irreversible damage, including slowed growth and development, learning disabilities, behavioral problems, and neurological damage.

The City of Toledo has been involved in lead clearance work for 30 years when it received its first Lead Hazard Control grant in 1995. The city also leverages funding from the Ohio Department of Development and the Lucas County Regional Health Department EPA settlement funds to conduct lead inspections and risk assessments and perform lead clearances.

According to the 2017-2021 CHAS data, 86.0% of Low or Moderate Income Households (66,040 total households) live in units built before 1980, putting them at risk for lead-based paint exposure. Of these households, 9,800, or 12.8% of all LMI households in Toledo have children present. In Lucas County in 2023, there were a total of 6,865 total kids under the age of 6 tested for lead and 337 children tested positive, an incidence level of 4.91%. This is one of the highest rates in the state of Ohio due to the significant number of homes built prior to the 1978 lead paint ban in need of rehabilitation.

**Table 5 - Lucas County Blood Lead Testing Data, Children <6, 2016-2023**

Year	Elevated		Not Elevated		Total	
	Test Count	% of Total	Test Count	% of Total	Test Count	% of Total
2016	474	8.16%	5,335	91.84%	5,809	100%
2017	444	7.14%	5,774	92.86%	6,218	100%
2018	406	6.06%	6,297	93.94%	6,703	100%
2019	313	5.05%	5,889	94.95%	6,202	100%
2020	235	4.75%	4,713	95.25%	4,948	100%
2021	219	4.35%	4,813	95.65%	5,032	100%

2022	328	4.93%	6,319	95.07%	6,647	100%
2023	337	4.91%	6,528	95.09%	6,865	100%

**Data Source:** Data Ohio, Blood Lead Testing (2016-Present)

### *Discussion*

The city will continue to run its Rooftops Repair, Home Repair, and Lead Hazard Control programs to assist Toledo residents with some of the most urgent home repair needs in the city.

# MA-25 Public and Assisted Housing - 91.210(b)

## Introduction

The city of Toledo has an excellent working relationship with the Lucas Metropolitan Housing (LMH) as the housing authority works to provide public housing options to the city's low- and moderate-income families. Having a safe, clean, and affordable place to live is the most immediate need of all residents in Toledo, including residents in public housing and/or those who are using Housing Choice Vouchers. The stability that a safe home can provide cannot be underestimated. Public housing is a critical component of the ecosystem on affordable housing options in the city, and public housing residents and families using Housing Choice Vouchers are predominately low-income, and in many cases extremely low-income.

The demand for affordable housing in Toledo is strong. Based on the limited availability of high-quality affordable housing options, waiting times for public housing can be significant. The Annual Public Housing Authority Plan for LMH tracks the waitlists for public housing developments and for Housing Choice Vouchers.

### Public Housing Waitlist

The waiting list for public housing has 1,539 families, with approximately 300 families on average turnover on the waitlist. Slightly more than 85 percent of the individuals on the waitlists are extremely low-income, 10 percent are very low-income households, and almost 5 percent are low-income households. One-quarter of the waitlist includes families with children, 64% are single individuals, 8% are elderly families, and 45% are families with disabilities. From a racial perspective, over three-quarters of the waitlist are Black / African American about one-quarter of the waitlist is comprised of White residents.

### Housing Choice Voucher Waitlist

The waitlist for Housing Choice Vouchers has been closed since September 2019, except for project-based vouchers. The waitlist includes 1,259 families, with zero annual turnover. Slightly more than 84 percent of the individuals on the waitlists are extremely low-income, almost 12 percent are very low-income households, and less than 3 percent are low-income. Over two-thirds of the waitlist includes families with children, 24% are single individuals, almost 3% are elderly families, and almost 5% are families with disabilities. From a racial perspective, almost 83% of the individuals on the waitlist are Black / African American, and almost 16% are White residents.

MA-25 Figure 1: Total Number of Units by Program Type									
Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units / vouchers in use	0	0	2,592	4,494	540	3,954	170	46	504
# of accessible units									

Data Source: PIC (PIH Information Center)

### Describe the supply of public housing developments

*Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:*

Lucas Metropolitan Housing (LMH) owns, manages, and maintains 2,592 units of public housing in and around the city of Toledo. The housing developments owned and operated by LMH are located across the city and take a variety of forms, from low-rise and scattered site developments to high-rise buildings. The developments tend to be older, with some dating back to the 1930s, and their physical condition varies. The map below shows the locations of the LMH properties throughout the city.

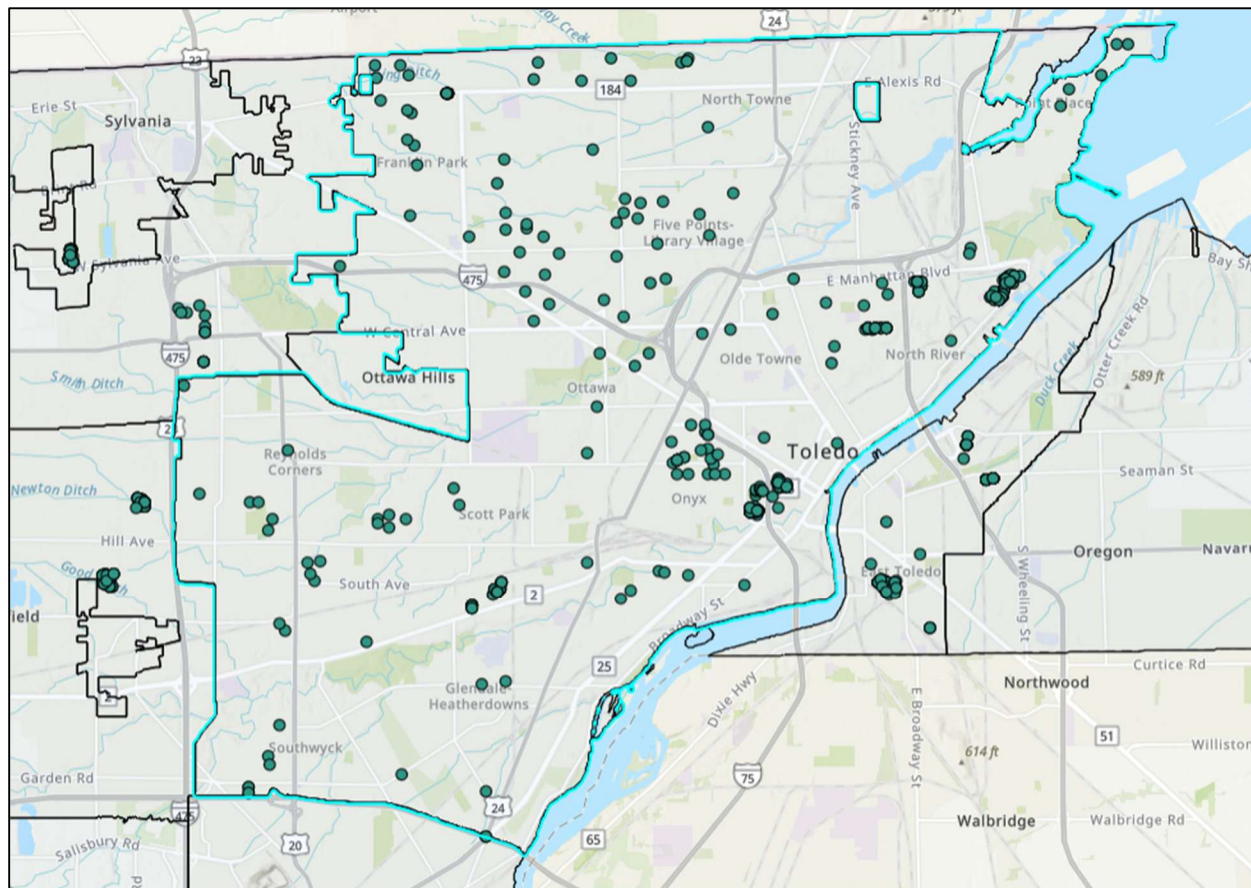
LMH also administers 4,494 Housing Choice Vouchers. The current utilization of LMH's vouchers is 3,927 as of October 2024, resulting in a leasing percentage of 87.4%. Unfortunately, LMH is unable to distribute these unused HCVs due to the agency reaching its budget authority cap. This happens as private market rents increase and the housing authority needs to increase its allocation amount to support the continued residency of housing choice voucher holders.

Among these vouchers, 275 are Non-Elderly Disabled Vouchers (of a total of 300), and 42 are Family Unification Program Vouchers (of a total of 46). There are 504 vouchers for disabled residents and 170 Veterans Affairs Supportive Housing vouchers used to support affordable housing for Veterans. The total budgetary authority for 2024 was \$29,292,045.

There are not enough affordable housing options in the City of Toledo and often families and households that receive new vouchers are unable to find housing in the city. Several variables play a role in a family's success, but lack of quality affordable housing units that are in a physical condition allowing them to pass inspection continues to be a leading barrier preventing individuals and families from utilizing their voucher and leasing up.

LMH also administers 4,494 Housing Choice Vouchers, including 504 vouchers for disabled residents and 170 VASH vouchers used to support affordable housing for Veterans.

**Figure 5 - Public Housing Developments**



**Data Source:** HUD GIS

MA-25 Figure 2: Public Housing Condition					
Development	# Units	UPCS Inspection		NSPIRE Inspection	
		Date	Score	Date	Score
Dorrell Manor	359	5/15/23	90b		
Flory Gardens	440	5/24/23	65c		
Weiler Homes	425	4/20/23	89c		
Ravine Park Village	496	4/17/23	63c		
Vistula Manor	482	6/27/23	71c		



		UPCS Inspection		NSPIRE Inspection	
<b>TenEyck Tower</b>	323	6/28/23	70c		
<b>Collingwood Green, Phase I</b>	33	11/30/22	79c	1/26/24	91
<b>Collingwood Green, Phase II</b>	34	11/2/22	83c		

Data Source: HUD - REAC

The physical inspection scores for public housing developments are part of HUD's Real Estate Assessment Center's (REAC) system to ensure that properties are maintained in a decent, safe, sanitary, and in good repair condition. These scores range from 0 to 100 points and are used to assess a property's overall physical condition.

- 90 to 100 points: Properties with scores in this range are considered to be in excellent condition. They are inspected every third year.
- 80 to 89 points: Properties with scores in this range are in good condition but may have some minor issues. They are inspected every second year.
- Below 80 points: Properties with scores below 80 might have more significant issues and are subject to more frequent inspections to ensure that the conditions improve.

The physical inspection generates comprehensive results for each of five physical inspectable areas: Sites; Common Areas; Building Systems; Building Exteriors; and Units, as applicable. A sample of units in the Asset Management Project (AMP) are scored, resulting in a Public Housing Agency (PHA) composite score. The higher the score, the better the physical condition of the property.

According to the most recent inspection scores, some developments are in need of rehabilitation with the exception of Dorrell Manor, Weiler Homes, and Collingwood Green Phase I and II.

*Describe the restoration and revitalization needs of public housing units in the jurisdiction*

The rehabilitation needs of the public housing units managed by LMH are similar to other developments of similar size and age throughout the city. Many of the large-scale developments need ongoing maintenance and rehabilitation related to new doors, window replacements, roof replacements, boilers, HVAC components, plumbing, electrical systems and energy efficiency improvements, common area maintenance, hallway flooring and carpeting, siding, structural repairs including foundation and exterior refurbishments, and repaving of driveways and parking lots. This is in addition to any specific ADA room modifications or rehabilitation needs when the rooms are vacated by tenants and rehabilitated prior to a new tenant moving in. It has been determined that the most immediate threat to the state's public housing units, mostly due to the age of the stock and its level of deferred maintenance, is its preservation. This is in addition to any specific room modification or rehabilitation when the rooms are vacated by tenants and upgraded

prior to a new tenant moving in. LMH's capital plan is focused on modernizing as much as can be done with the funds allotted to the agency through their regular capital fund program and any grants they receive from other sources. The full capital improvement plan is covered in LMH's Annual Plan & the 5 Year Plan which are published on LMH's website.

Importantly, LMH launched a Portfolio Repositioning Strategy to create housing opportunities in favorable neighborhoods in the city and to improve existing housing conditions to create mixed-income communities of choice. There are five projects in the development pipeline for the 2024-2026 time period. These include the following projects in the table below.

Table 6 - LMH Development Projects				
Development Project	Units	Building Type	Total Development Cost	Expected Delivery Date
Palmer Gardens	75	Mixed Income & Seniors	\$15 million	2025
TenEyck Towers	154	Elderly / Disabled	\$15 million	2025
CWG IV	40	Mixed-Income / Families	\$20 million	2025
The Park Hotel	45	Transition-Aged Youth	\$14 million	2025
CWG V	75	Elderly	\$28 million	2026
Mission Point	65	Homeless	\$21 million	2027

**Data Source:** Lucas Metropolitan Housing

*Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:*

LMH's mission is leading in the development and sustainability of housing accessible to all and providing pathways to an enhanced quality of life to empower vibrant communities. Using a combined approach of modernizing its existing portfolio and developing new housing, LMH is working towards creating improved living environments for all families living in public housing units. Safety and security for LMH residents is of the utmost importance. As such, LMH has invested in and continues to invest in security upgrades including cameras, digital call boxes, cellular dialers, and new fire panels. LMH's four-year strategic plan is available on the website for additional information.

LMH has a goal of building pathways to family income wealth building and economic advancement which underscores LMH's commitment to not only providing a quality living environment but also facilitating the economic empowerment of its low-income residents. Their Economic Advancement strategy seeks to enhance existing and create new programs and initiatives for residents to build

wealth and increase economic opportunities. LMH's Resident Services department plays a crucial role in enhancing the lives of residents living in both Public Housing and HCV communities by focusing on providing residents with access to a range of supportive services aimed at fostering personal growth, learning opportunities, and economic advancement.

## **Discussion**

With a portfolio of almost 2,600 public housing units among the developments LMH owns and operates, they support the housing needs of some of the most vulnerable low-income families in the city. Additionally, LMH administers 4,494 Housing Choice Vouchers, of which 3,927 are currently being used to lease market rate units as of October 2024. However, the need for more affordable housing units far surpasses the ability of the housing authority.

# MA-30 Homeless Facilities and Services –

## 91.210(c)

### Introduction

#### Facilities and Housing Targeted to Homeless Households

There are several agencies and organizations in the city of Toledo that provide services for individuals and families facing homelessness. Below is a summary of key organizations, the services they offer, the populations they serve, and available data on the number of clients they assist annually.

- **Toledo Lucas County Homelessness Board (TLCHB):** TLCHB leads efforts to eliminate homelessness in Lucas County by administering grants, overseeing the Homeless Management Information System (HMIS), and coordinating community resources. TLCHB serves as the lead for the Toledo Continuum of Care.
- **Leading Families Home dba Beach House:** Offers emergency shelter, transitional housing, rapid re-housing, and supportive services aimed at achieving long-term housing stability focusing on families with children experiencing homelessness.
- **Family House:** Operates as an emergency shelter providing temporary housing and supportive services for families with children.
- **Catholic Charities Diocese of Toledo:** Manages emergency shelters, permanent supportive housing, and other supportive services for individuals and families experiencing homelessness, including those fleeing domestic violence.
- **St. Paul's Community Center:** Provides emergency shelter services, including a Winter Crisis Program, and supportive services for individuals experiencing homelessness.
- **Aurora Project, Inc.:** Offers transitional housing and supportive services for women and children experiencing homelessness.
- **Neighborhood Properties, Inc. (NPI):** Manages permanent supportive housing and other housing programs for individuals with mental health challenges and those experiencing chronic homelessness.
- **YWCA:** Operates emergency shelters and provides supportive services for women and children, particularly those affected by domestic violence.
- **Cherry Street Mission:** The region's largest provider of services. Offers emergency shelter services and supportive programs for individuals experiencing homelessness.
- **United Way of Greater Toledo 2-1-1:** Provides coordinated assessment and referral services through the 2-1-1 helpline for individuals and families experiencing or at risk of homelessness. The 2-1-1 service is a critical access point for those seeking assistance.
- **Treatment Accountability for Safer Communities (TASC):** Offers permanent supportive housing and rapid re-housing programs for individuals with substance use disorders and those involved in the criminal justice system.

- **Salvation Army:** Provides rapid re-housing and other supportive services for individuals and families experiencing homelessness.
- **Lutheran Social Services:** Offers rapid re-housing programs and supportive services for individuals and families experiencing homelessness.
- **Zepf Center:** Provides transitional housing that is recovery-focused to provide a foundation of stability and security for individuals in early sobriety.

Table 7 - Facilities and Housing Targeted to Homeless Households					
	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	217	0	44	365	
Households with Only Adults	302	33	11	533	
Chronically Homeless Households	0	0	0	529	
Veterans	0	0	0	132	
Unaccompanied Youth	14	0	0	0	

Data Source: HUD Housing Inventory Count

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

There is a network of Federally Qualified Health Centers in Toledo that provide an assortment of health care and behavioral health services for individuals, including those that are experiencing homelessness. These include the following:

- **South Side Community Health Center:** Primary care, dental care, behavioral health, women's health, and pediatric care.
- **Neighborhood Health Association:** Primary care, dental care, behavioral health, women's health, pediatric care, and pharmacy services.
- **River East Community Health Center:** Primary care, dental care, behavioral health, women's health, pediatric care, and pharmacy services.

- **Compassion Health Toledo:** Primary care, dental care, behavioral health, women's health, pediatric care, prenatal services, and pharmacy services.
- **Equitas Health Toledo:** Primary care, dental care, behavioral health, women's health, pediatric care, and pharmacy services.
- **Old West End Community Health Center:** Offers medical, dental, behavioral health, substance use treatment, a pharmacy, and social services and outreach.
- **Unison Behavioral Health Center:** Mental health and substance abuse services.
- **Zepf Center:** Primary care, dental care, behavioral health, women's health, pediatric care, and pharmacy services.

These FQHCs use a sliding fee scale based on the patient's income and family size. This means that patients pay what they can afford, and those with very low incomes may receive services at no cost or at a significantly reduced cost. Further, many low-income and homeless individuals are eligible for Medicaid, which covers a wide range of medical services. FQHCs receive reimbursement from Medicaid for the services they provide to eligible patients.

The **Toledo-Lucas County Health Department** offers medical and dental care, family planning, and nutrition assistance. These services are accessible to homeless individuals, ensuring they receive essential healthcare regardless of housing status. The department also provides immunizations and health education, contributing to overall well-being.

The **Toledo/Lucas County CareNet** connects uninsured residents, including those experiencing homelessness, with healthcare providers offering free or reduced-cost services. This network ensures access to necessary medical care, facilitating early intervention and management of health conditions

Regarding employment services, there are several agencies operating in the Toledo area to support individuals, including homeless individuals transitioning into employment. Cherry Street Mission offers several job training programs to assist individuals, including those experiencing homelessness. These trainings include Automotive Technology, Building Trades, Culinary Arts, Forklift Operator, Food Truck Social Enterprise, Machining and Machine Repair, Office Assistant, and Welding. Goodwill Industries of Northwest Ohio offers a Job Connection Center that provides workforce development services such as resume building, application submission, interviewing skills, Job development and placement.

Ohio Means Jobs is part of the Lucas County Workforce Investment Board. They provide employment services through the American Jobs Center such as:

- **Career Coaching and Job Placement:** Assistance with resume development, interview practice, and job search strategies.
- **Training Programs:** Access to training and skill enhancement programs, including the Comprehensive Case Management and Employment Program (CCMEP) for young adults aged 14-24.
- **Resource Room:** Free access to computers, internet, fax machines, and job boards.

- Workforce Innovation and Opportunity Act (WIOA): Programs for adults, dislocated workers, and young adults to help them gain skills and credentials for employment.
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T): Support for skill enhancement and job readiness.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

The City of Toledo works with third-party entities to deliver services to vulnerable populations such as the homeless. Below is a listing of active homeless facilities in Toledo according to the homeless shelter directory. These facilities offer a variety of supportive services to clients who are homeless or in need.

- Rebekah's Haven - Women's and children's shelter. This shelter is run by the Toledo Gospel Rescue Mission.
- Cherry Street Mission Toledo - Cherry Street Mission (Cherry Street) mission serves those in need.
- Beach House Family Shelter - Helps homeless women and families regain independence. Serves: women; men or women with children; couples. Intake for shelters in Lucas County are processed through the United Way.
- St. Paul's Community Center - St. Paul's offers a variety of programs targeted to helping individuals in need.
- Toledo Gospel Rescue Mission –Men's Shelter.
- The Sparrow's Nest - 24/7 facilities which serves women all hours of the day. The Sparrow's Nest is a 54-bed facility. The first floor is primarily used in service to those who are in emergency need or are candidates for the Ready for Life Program.
- Family House - Largest shelter for families who are homeless in Northwest Ohio. Shelter and food provided, as well as intensive, individualized case management and supportive services. The goal at Family House is to help families in crisis to find permanent housing, and to regain control over their lives.
- La Posada Family Emergency Shelter - Offers temporary housing and supportive services to homeless families of all faiths in the Toledo area. Direct services through La Posada include shelter, food, clothing, personal hygiene products and case management.

Other service providers include local mental health facilities who work collaboratively with shelters and housing providers to ensure seamless service delivery for their clients. Through funding provided by the mental health board, clients are provided service enriched housing which allows them to live more independently. Additionally, Toledo Public Schools works with the CoC board to collaborate on identifying homeless youth and finding solutions to their situations. The local United

Way also provides funding through a special grant for the purpose of funding case managers that work to re-house families with school age children within the same school catchment area, so they do not have to be uprooted from their current school.



# MA-35 Special Needs Facilities and Services -

## 91.210(d)

### Introduction

There are households throughout the City of Toledo that may have special housing and supportive service needs unrelated to homelessness. Some of these population groups include the elderly and frail elderly; those living with some type of physical or cognitive disability; those living with HIV/AIDS and their families; persons with substance use disorders; and victims of domestic violence, dating violence, sexual assault, and stalking. These groups typically face greater housing challenges than the general population due to their specific circumstances and the city's housing stock may not be suitable for households with particular special needs. These groups may also require special attention due to additional social services required. These population groups are discussed in NA-45.

*Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs*

### Elderly and Frail Elderly

The City of Toledo has 41,518 older residents, aged 65 or older living in a total of 29,304 households, including those living in institutionalized settings (i.e., assisted living and nursing care facilities). This represents 15.5% of the total population and 24.7% of all households in the city. Among these seniors, 53.2% live in family households, 38.6% live alone, and the remaining 6.2% live in non-family (not alone) households or group quarters.

Generally, the senior population has more limited fixed incomes than the population as a whole, primarily Social Security and other retirement income. While 85.3% of Toledo seniors aged 65 and older are at or above the Federal Poverty Level, there are 9,520 elderly households that experience housing cost burdens of over 30% (4,985 owner-occupied households and 4,535 renter-occupied households). Further, as discussed in NA-10, there are 2,335 elderly renters and 2,465 elderly homeowners of all income categories that spend more than 50% of their income on housing. Additionally, limited incomes inhibit the ability to make the necessary home improvements to ensure their homes are in compliance with the City's building and property maintenance codes that ensure homes meet minimum health and safety standards. It is not uncommon in the city to see homes occupied by seniors in need of significant repairs to major building components, such as roof and window replacements, heating and electrical systems, exterior paint and siding deterioration, and porches and foundations.

### Persons with Physical or Cognitive Disabilities

For people with disabilities, there are many barriers to housing. Ambulatory difficulty inhibits an individual's ability to walk or climb stairs. Due to the physical characteristics of the city's housing

stock, with many split-level ranch-style homes and multi-story two- to four-unit homes, a primary concern is providing accessible housing options for the 21,537 Toledo residents that experience ambulatory difficulty, and the 22,858 residents (9.2% of the total Toledo population) with self-care and independent living difficulties. Specific construction features and accessibility modifications are often required for those with mobility challenges, depending on the type and severity of these challenges (i.e., handrails, ramps, wider doorways, lowered kitchen counters and sinks, wheel-in showers, grab-bars, etc.). For people who use mobility devices, finding housing with even basic accessibility features can be daunting, if not entirely impossible or unaffordable.

Income levels for persons with disabilities (mental, physical, or developmental) tend to be lower than median area income, resulting in profound affordability concerns. While newly constructed multi-family units are required to have accessibility for such populations, many older units tend to be lacking such features. Stable housing for persons with mental illness is hugely beneficial regarding their mental health care because the primary location of a support network is directly linked to their residence. Those living with a mental or developmental disability can find it difficult to retain housing and often their disability prevents them from finding suitable employment or earning an adequate wage that allows for independent living. Many individuals with mental illness are dependent solely on Supplemental Security Income as their primary source of income. Affordability issues become even more challenging for this population as there are few options in the private housing market and their disability leaves them at greater risk of homelessness and ill-equipped to navigate the public support system without substantial assistance. Without affordable, accessible housing in the community, many are at risk of institutionalization or homelessness.

Through consultation and research, there is a noticeable increased demand for mental health services, but a limited number of providers, or resistance to accepting care. While the stigma around mental health is decreasing, there are not enough social workers or mental health professionals to meet the rising demand. A significant barrier to stabilizing housing for individuals experiencing homelessness is the lack of proper mental health care. Some individuals do not recognize or refuse their need for treatment, making them ineligible for certain housing programs. Mental health providers often struggle to find qualified professionals to fill roles for the provision of services leading to long waiting times and provider shortages. This makes it difficult for some individuals to get immediate crisis intervention or consistent care.

### **Persons with alcohol or other drug addictions**

Supportive housing for individuals living with alcohol or drug addiction plays a crucial role in their recovery process. For their recovery to be successful, they need a stable environment which can help minimize substance misuse and relapse, improve medical and mental health status, enhance overall quality of life, and sustain recovery. The types of supportive housing can include peer-run recovery residences to more structured sober living homes and residential treatment housing, depending on the individual's needs. Supportive housing often includes access to counseling services, therapy, and peer support, which are essential for maintaining sobriety and building a

foundation for long-term recovery. Often, they need to be removed from the previous environment in order to remain committed to their recovery.

### **Persons with HIV/AIDS and their families**

Toledo is not a significant source of new HIV/AIDS cases in the state. However, as with any other population group, affordable housing options are of urgent concern for persons living with HIV/AIDS. Stable housing is required to maintain a consistent medication regime. Individuals need a place to take care of hygiene and their immune system. No one who lives on the street can be compliant with their medication treatment or care. When people have stable housing, they are better able to receive the services they need.

There are limited agencies in Toledo that provide services and housing for people with HIV/AIDS. These include the following:

- **Equitas Health Toledo:** Offers high-impact HIV-related prevention, supportive, and health navigation services. Assistance with health insurance, medication coverage, food, transportation, and other resources.
- **H.O.P.E. Through Divine Intervention (HTDI):** HTDI's Project Link Transitional Housing provides short-term housing for a period of up to two year specifically for men and transgender women living with HIV/AIDS.

### **Victims of Domestic Violence**

The YWCA of Northwest Ohio is the only emergency domestic violence shelter in the community. It provides 24/7 emergency shelter and rape crisis services, ensuring that victims have a safe place to go at any time. YWCA runs an Emergency Domestic Violence Shelter that is open 24/7 for victims of intimate partner violence, sex trafficking, and other forms of abuse. The shelter houses victims regardless of gender (although the vast majority are women). Importantly, no one is turned away, even when the shelter is at capacity. Instead, overflow victims are placed in hotels (with no dedicated funding for these costs).

YWCA also operates 65 efficiency, one-bedroom, and two-bedroom apartments under a Low-Income Housing Tax Credit (LIHTC) arrangement. Securing units for survivors is difficult due to long voucher approval processes and restrictive HUD requirements. The facility is currently under renovation to double capacity, but further expansion is hindered by funding gaps.

*Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing*

Households with mental or physical health issues face barriers to safe, decent and affordable housing. Persons with mental or physical health issues can be discharged from institutions but are then unable to find independent housing that they can afford or reasonably maintain. Those who are homeless can also be discharged from institutions with no other housing options. In most areas of the state, there is a housing affordability crisis. Further, there is a limited supply of deeply

subsidized permanent supportive housing and affordable housing options in Toledo for persons returning from mental and physical health institutions.

Whenever possible, supportive services for the elderly, persons with HIV/AIDS, persons with mental health issues, etc. are provided within their living environment. Often these services are needed by individuals who are vulnerable to being marginalized by mainstream society unless they have a strong support network in place that advocates for them. Those that are aging in place may become extremely isolated and disconnected to any support network. Mental health, poverty, and mobility for the elderly and persons with disabilities are issues that can have significant supportive housing needs. Ramps, live-in help, medical and social visits, food services such as Mobile Meals / Meals on Wheels, and other socialization and support activities are needed by all these populations.

*Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)*

During the 2025-2026 Program Year, the City of Toledo will undertake several projects to assist the following special needs populations.

The TLCHB and the Toledo Lucas County CoC members continue outreach efforts and ways to expand opportunities for collaboration to more fully include all persons who may be at highest risk of becoming homeless. Efforts to assist the supportive housing needs of those with special needs, as well as prevent those households and individuals from falling into homelessness, are a priority as the City of Toledo works towards eliminating homelessness. By presenting educational opportunities regarding financial, medical, behavioral and other issues that can help stabilize a household, the City hopes to prevent many borderline households from entering homelessness. The following one-year goals will address the housing and supportive services of persons who are not homeless but have other special needs:

- Cherry Street Mission: Workforce Development Program provides vocational training and job placement assistance to under-resourced individuals in Toledo, including some special needs populations.
- Soup Kitchens, Community Gardens, and Healthy Meals Programs: offers healthy food options to low-income Toledo residents, including special needs populations.
- Neighborhood Health Association: provides primary adult and pediatric care, midwifery, Doula care, dental, social work, patient navigation, substance abuse services, homeless health care, school-based care, senior health care, mobile unit care, pharmacy, laboratory and behavioral health care to low- and moderate-income Toledo residents, including special needs populations.
- Home Repair and Rehabilitation Programs: the city's Rooftops program, home repair program, and lead remediation program, as well as rehabilitation programs managed by Maumee Valley Habitat for Humanity, and Pathway, Inc. will provide housing repairs to low-

and moderate-income Toledo residents, including special needs populations, especially senior households.

- The Mayores Senior Center Roof Repair will enhance the senior center facility so it can continue to provide services to seniors in the Old South End neighborhood and beyond.
- Fair Housing and Housing Legal Assistance provided by the Fair Housing Center will assist low- and moderate-income Toledo residents, including special needs populations.

*For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))*

Toledo is not part of a Consortium and has not planned any activities other than those listed above.

# MA-40 Barriers to Affordable Housing - 91.210(e)

## *Negative Effects of Public Policies on Affordable Housing and Residential Investment*

Several documents were reviewed and supplemented with consultation with municipal staff, affordable housing developers, and the Toledo Fair Housing Center to identify the barriers to affordable housing. These documents included:

- 2025-2029 Analysis of Impediments to Fair Housing Choice
- Forward Toledo Comprehensive Land Use Plan
- Toledo Together 10-Year Action Plan for Housing

The following barriers to affordable housing have been identified.

### **Regulatory Barriers**

**Lengthy Permitting and Rezoning:** Toledo's permitting for multifamily housing takes about 90 days, compared to 60 days for neighboring areas. Complex rezoning and variance approval processes further delay development. Administrative approval of certain variances would speed progress.

**Zoning Misalignment:** Current zoning does not support townhomes or duplexes. Land-use restrictions limit options for missing middle housing and reinforce disinvestment in historically redlined areas. Regulations also restrict housing for people with disabilities and those recovering from substance abuse.

**Code Enforcement Disparities:** Enforcement is stricter on private homeowners than on bank-owned foreclosures. Investor-owned properties often lack maintenance, contributing to neighborhood decline.

### **Financial Barriers**

**Local Funding Gaps:** Lack of local funding prevents leveraging state and federal tax credits. High construction costs and limited demand for 4% LIHTCs hinder affordable housing development.

**Difficulty Securing State/Federal Resources:** Toledo struggles to compete for housing tax credits due to low appraisals and limited local support. City Council resistance to projects like Warren Commons hurts funding opportunities.

**Homeownership Challenges:** The city's down payment assistance program is slow, taking up to 90 days and causing buyers to miss out on homes.

**Discrimination:** Mortgage lenders disproportionately deny loans to Black and low-income applicants and some insurers charge higher premiums or deny coverage in minority neighborhoods.

### **Physical Condition**

**Blight and Disinvestment:** Long-term disinvestment in central neighborhoods has caused widespread blight and increased rehab costs, reducing the stock of livable affordable housing.

Investor Neglect: Out-of-town property owners often allow rental units to deteriorate, prioritizing profits over property upkeep.

### **Housing Accessibility and Affordability Barriers**

Income Discrimination: Landlords frequently reject alternative income sources like Social Security, Veterans Benefits, or Housing Choice Vouchers, reducing options for low-income renters.

Criminal Record Screening: Many landlords exclude applicants based on criminal histories unrelated to tenancy.

Lack of Accessible Housing: The city lacks adequate housing for individuals with disabilities, leaving them in unsuitable conditions.

### **Systemic Issues**

Severe Housing Shortage: Toledo lacks 12,705 rental units affordable to extremely low-income households, with only 35 available units per 100 renters. Nearly a quarter of the city's subsidized housing could be lost by 2031.

Barriers to HCV Use: Landlords commonly reject HCVs. Without local source-of-income protection laws, voucher holders face limited housing options.

### **Recent Solutions and Investments**

In January 2025, Toledo received \$4 million from the federal PRO Housing program to tackle two major barriers: an outdated zoning code and a weak housing market. The funding will support:

1. A comprehensive update of the city's zoning code and development standards;
2. The creation of pre-approved housing design templates to reduce development costs; and
3. Appraisal gap financing to incentivize affordable housing development in weak market areas, especially those identified in the Consolidated Plan's Geographic Target Areas.

# MA-45 Non-Housing Community Development Assets – 91.215 (f)

## Introduction

The information in this section describes Toledo's community and economic development assets, which play a vital role in addressing housing challenges in the city. Economic development directly supports the goals of the CDBG, HOME, and ESG programs by creating pathways to economic opportunity, helping residents increase their incomes, reduce housing cost burden and risks of homelessness, and potentially transition from renters to homeowners.

Toledo is Ohio's fourth largest city by population and land area, is strategically located in Northwest Ohio near the Michigan border and is approximately 35 minutes from Detroit. While the city's population has declined since the 1970s, Toledo has recently experienced significant economic momentum. In 2024, Toledo ranked among the top 10 cities nationally for new business investment according to Site Selection magazine's Governor's Cup Awards, highlighting its success in attracting corporate investment and fostering economic growth.

The city has seen remarkable investment activity in recent years. In 2024, Toledo secured \$170 million in federal grants for local glassmakers Libbey and O-I, which will create hundreds of new jobs. MOBIS received a \$30 million grant to expand electric vehicle operations, also generating hundreds of new positions. Additionally, Toledo was designated the first innovation hub in Ohio, supported by a \$31 million grant to advance glass and solar technologies, which is expected to create approximately 1,600 jobs.

Toledo's Department of Economic Development has implemented targeted programs like the Vibrancy Initiative, which invested \$835,000 in 18 local businesses during 2024. This initiative activated nearly 133,000 square feet of formerly vacant commercial space and leveraged almost \$22 million in private sector investment. The city has allocated an additional \$200,000 to continue this work in 2025.

Under the leadership of the Department of Economic Development, Toledo has focused on five strategic priorities: business retention and attraction, fostering entrepreneurial growth, enhancing community vibrancy, improving regulatory efficiency, and catalytic infrastructure improvement. These priorities aim to create high-paying jobs accessible to residents in low-to-moderate income neighborhoods, convert brownfield sites to productive use, and revitalize commercial corridors that have experienced disinvestment.

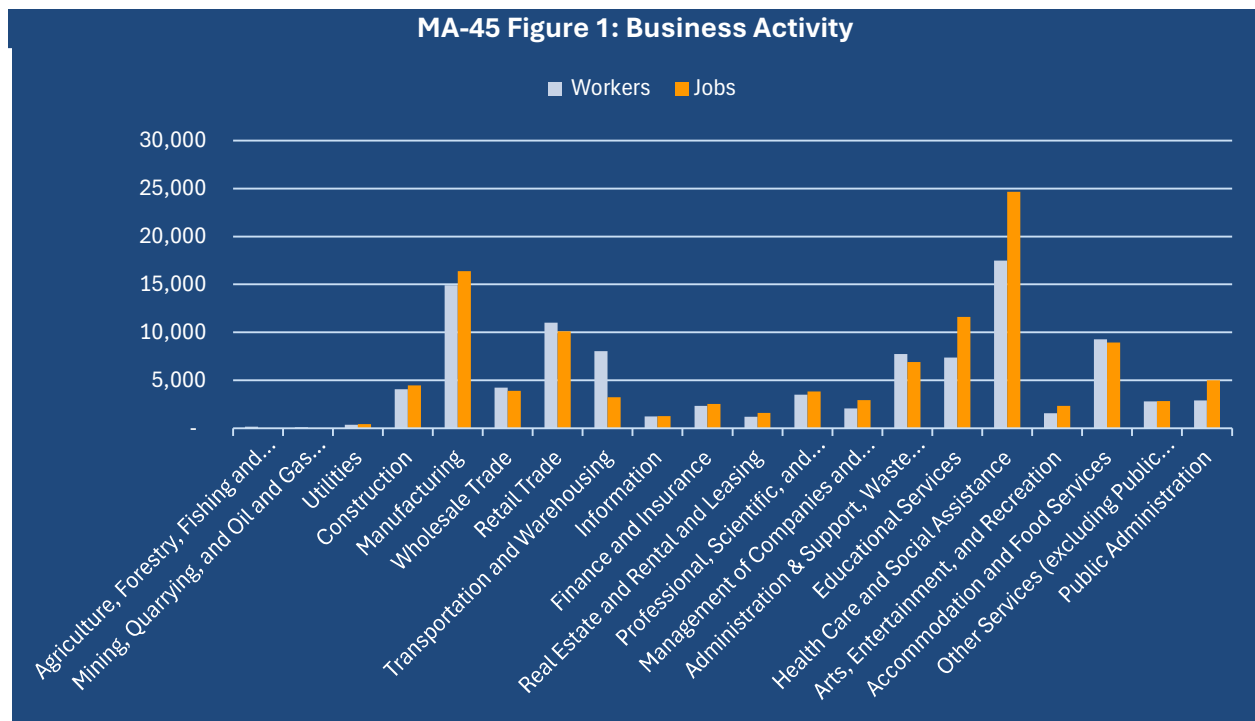
Through the success of its brownfield redevelopment initiatives, Toledo has transformed former industrial sites and vacant malls into employment centers across the city. Projects like the Toledo Trade Center (formerly North Towne Mall), Cleveland-Cliffs HBI Plant in East Toledo, and the Textileather site redevelopment for Stellantis have collectively created thousands of jobs and brought new economic activity to previously underutilized and environmentally contaminated



areas. These investments rehabilitated more than 655 acres of land and created over 3,100 new jobs, directly benefit Toledo residents by providing employment opportunities that can help reduce housing cost burden and improve quality of life. An important and notable investment in Toledo was the recent sale and redevelopment of the old Southwyck Mall that had been vacant since 2008 into a 150,000 square foot distribution center for Amazon that opened in 2021.

The following sections detail Toledo's business activity, labor force, education, and other economic assets that contribute to the city's capacity to address community development needs.

## Economic Development Market Analysis



	Workers		Jobs		D
	#	%	#	%	
<b>Agriculture, Forestry, Fishing and Hunting</b>	157	0.2%	41	0.0%	-116
<b>Mining, Quarrying, and Oil and Gas Extraction</b>	78	0.1%	12	0.0%	-66
<b>Utilities</b>	372	0.4%	420	0.4%	48
<b>Construction</b>	4,059	4.0%	4,451	3.9%	392
<b>Manufacturing</b>	14,926	14.6%	16,374	14.5%	1,448
<b>Wholesale Trade</b>	4,223	4.1%	3,912	3.5%	-311
<b>Retail Trade</b>	11,018	10.8%	10,093	8.9%	-925

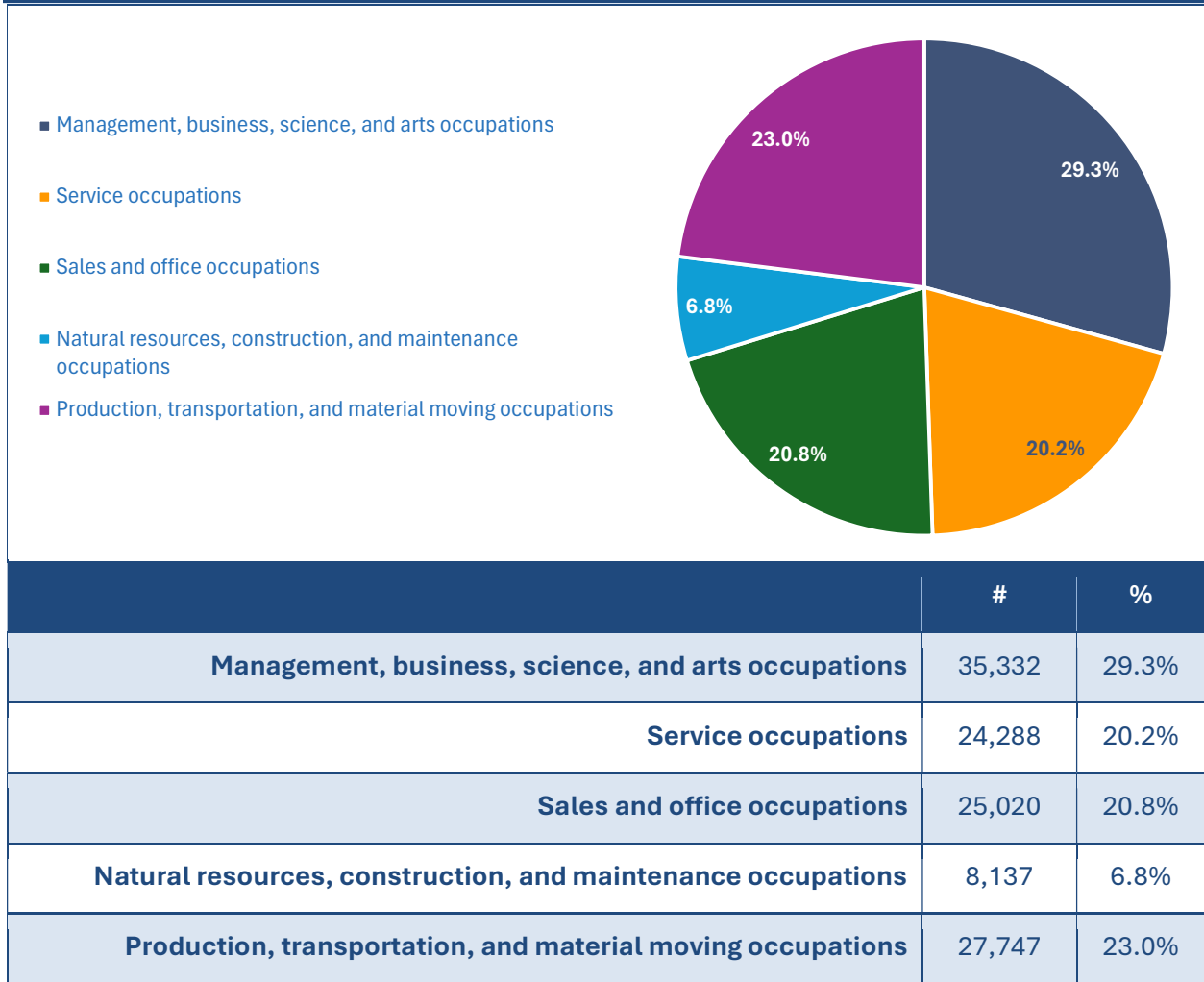
	Workers		Jobs		
Transportation and Warehousing	8,044	7.9%	3,221	2.9%	-4,823
Information	1,225	1.2%	1,274	1.1%	49
Finance and Insurance	2,328	2.3%	2,538	2.2%	210
Real Estate and Rental and Leasing	1,185	1.2%	1,604	1.4%	419
Professional, Scientific, and Technical Services	3,484	3.4%	3,830	3.4%	346
Management of Companies and Enterprises	2,052	2.0%	2,936	2.6%	884
Administration & Support, Waste Management and Remediation	7,742	7.6%	6,918	6.1%	-824
Educational Services	7,363	7.2%	11,607	10.3%	4,244
Health Care and Social Assistance	17,488	17.1%	24,651	21.8%	7,163
Arts, Entertainment, and Recreation	1,549	1.5%	2,318	2.1%	769
Accommodation and Food Services	9,281	9.1%	8,936	7.9%	-345
Other Services (excluding Public Administration)	2,811	2.7%	2,829	2.5%	18
Public Administration	2,891	2.8%	5,015	4.4%	2,124
Total	102,276		112,980		

Data Source: LEHD

MA-45 Figure 2: Labor Force			
	Total Working-Age Population (16-64)	16-24	25-64
Civilian Labor Force	124,295	20,834	103,461
Civilian Employed Population	113,605	17,304	96,301
Unemployment Rate	8.6%	16.9%	6.9%

Data Source: 2018-2022 ACS - B23001

**MA-45 Figure 3: Occupations by Sector**



Data Source: 2019-2023 ACS – DP03

**MA-45 Figure 4: Travel Time**

	#	%
< 30 Minutes	91,775	83.2%
30-59 Minutes	14,834	13.4%
60 or More Minutes	3,700	3.4%
<b>Total</b>	<b>110,309</b>	<b>100.0%</b>

Data Source: 2019-2023 ACS - B08303

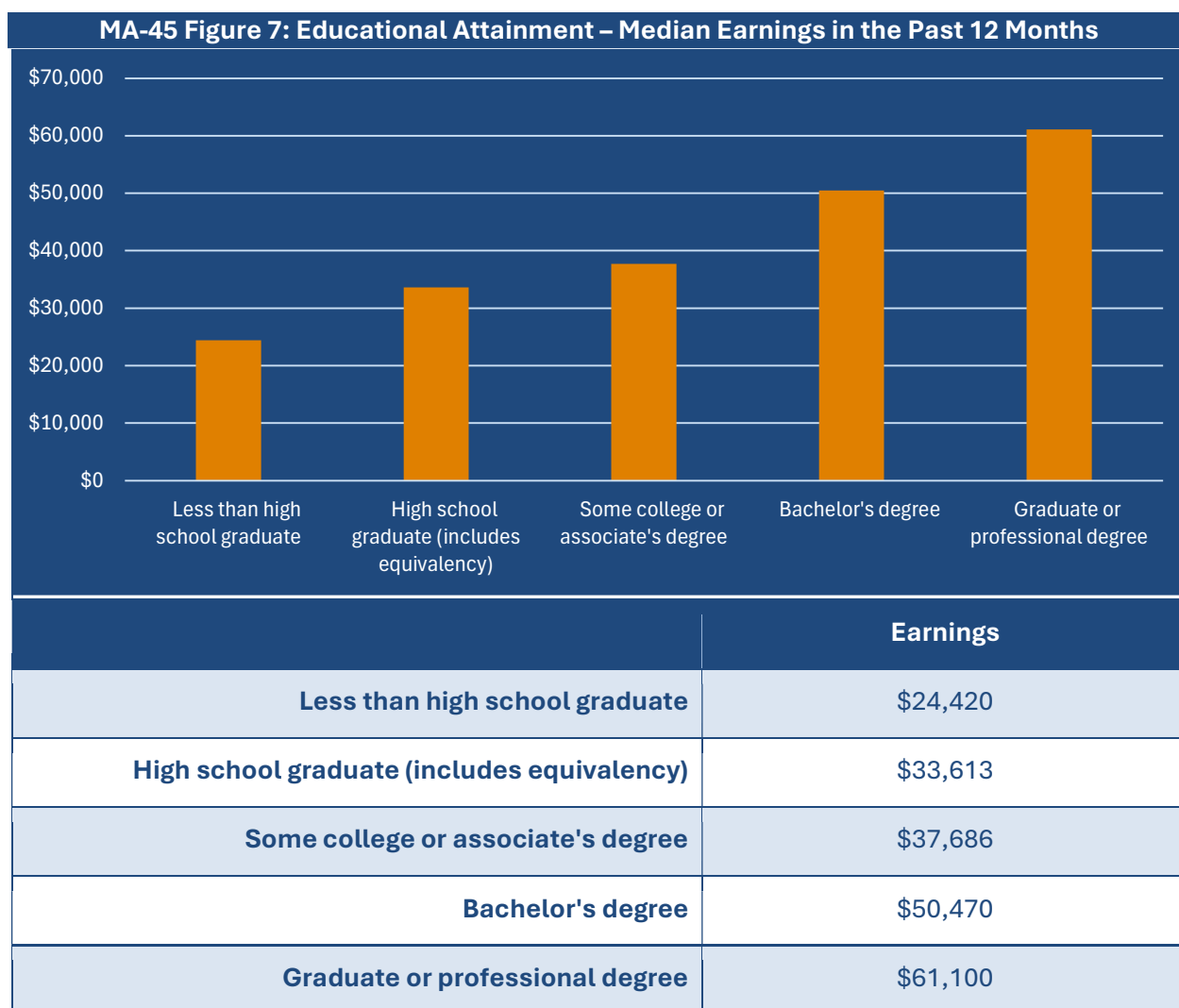
**MA-45 Figure 5: Educational Attainment by Employment Status (Ages 16+)**

Data Source: 2019-2023 ACS - B23006

**MA-45 Figure 6: Educational Attainment by Age**

	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	259	1,048	1,135	1,852	1,978
9th to 12th grade, no diploma	4,219	3,362	3,043	5,512	3,551
High school graduate, GED, or alternative	8,949	12,659	9,220	22,516	14,911
Some college, no degree	10,053	11,402	7,723	15,381	8,599
Associate's degree	846	3,100	3,698	7,067	4,093
Bachelor's degree	2,564	7,430	4,786	7,616	4,822
Graduate or professional degree	261	3,159	2,629	3,634	3,564

Data Source: 2018-2022 ACS - B15001



Data Source: 2018-2022 ACS - B20004

*Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?*

In descending order, the major occupational sectors in Toledo are Management, business, science, and arts (29.3%), Production, transportation, and material moving (23%), Sales and office (20.8%), Service Occupations (20.2%). Additionally, 6.8% of Toledo workers have Natural resources, construction, and maintenance occupations.

Drilling down to industry level using 2022 LEHD data, we find that over half the jobs are in Health Care and Social Assistance (21.8%), Manufacturing (14.5%), Education (10.3%) and Retail (8.9%). The remaining 44.5% of jobs in Toledo are split between several industries, with only Accommodation and Food Service (7.9%) and Administration and Support, Waste Management & Remediation (6.1%) accounting for more than 5% of jobs.

Three of the top industries draw thousands of workers from outside of Toledo, indicating potential room for local workforce development. They are Health Care (7,163), Manufacturing (1,448),

Education (4,244). The Retail industry has 925 more workers than jobs in Toledo, causing an outflow of Toledoans to other municipalities for work.

Finally, the median yearly income in Manufacturing (\$47,296), Education (\$41,186), and Health Care (\$37,183) are all above the median worker income of \$35,152 in Toledo. Meanwhile the median Retail income (\$27,687) is below the overall city median income.

	Inflow	Outflow	Interior
<b>Jobs</b>	66,086	55,382	46,894
<b>Age</b>			
< 30	13,389	16,196	10,335
30 - 54	35,195	28,091	24,753
55+	17,502	11,095	11,806
<b>Earnings per month</b>			
< \$1,250	8,707	11,328	8,492
\$1,251 - \$3,333	15,337	19,624	15,525
\$3,333	42,042	24,430	22,877
<b>Industry Class</b>			
Goods Producing	12,590	10,932	8,288
Trade, Transport, Utilities	10,920	16,931	6,726
All Other Services	42,576	27,519	31,880

Data Source: LEHD

*Describe the workforce and infrastructure needs of the business community:*

## Workforce Needs

The business community in Toledo faces significant workforce challenges. The city has one of the highest unemployment rates in Ohio and there is a disconnect between available jobs and the local workforce. Companies regularly report that they have immediate positions to fill but do not have the talent pool necessary to fill these positions. Toledo businesses consistently identify several key workforce needs:

- **Skills Gap:** There is a notable gap between the skills possessed by Toledo's workforce and those required by employers, particularly in manufacturing, healthcare, and emerging technology sectors. This mismatch limits companies' ability to expand operations and hire locally.
- **Job Readiness:** Employers report challenges with basic job readiness among applicants, including reliability, workplace communication, and technical proficiency needed for entry-level positions.
- **Middle-Skill Workers:** Similar to national trends, Toledo has a significant need for workers in "middle-skill" occupations that require education beyond high school but less than a four-year degree. These include positions in advanced manufacturing, healthcare support, and skilled trades.
- **White-Collar Talent:** The Department of Economic Development, working with the Toledo Chamber of Commerce and Regional Growth Partnership, has identified a strategic need to attract and retain more professional talent to support diversification of the economy beyond manufacturing and logistics.

## Infrastructure Needs

Business infrastructure needs in Toledo center on several key priorities:

- **Commercial Corridor Revitalization:** Business districts throughout the city have experienced significant commercial vacancy and deterioration. The business community needs targeted investment in commercial corridors. The Vibrancy Initiative has helped activate nearly 133,000 square feet of formerly vacant commercial space; however, there is significantly more need.
- **Modernized Commercial Spaces:** Many older commercial buildings require significant code upgrades and modernization to become suitable for new businesses. The city's white box grant program addresses this by funding improvements needed to bring spaces to certificate of occupancy standards.
- **Brownfield Redevelopment:** Converting former industrial sites and vacant commercial properties into larger-scale, job-creating, export-oriented developments remains crucial. The Department of Economic Development secured \$11.5 million in brownfield remediation funding in 2024, but notes ongoing funding for acquisition, remediation, and site preparation is a persistent need.
- **Streetscape Improvements:** Businesses need enhanced streetscapes to improve accessibility, safety, and aesthetic appeal. Projects like the planned improvements to Summit Street in the Vistula neighborhood aim to create environments more conducive to commercial activity and connections to downtown.
- **Transportation Connectivity:** Infrastructure that better connects neighborhoods to employment centers is essential. Major arterial streets like Cherry Street and highway systems currently create barriers between downtown and surrounding neighborhoods like

Junction, Englewood, and Vistula. The \$20 million RAISE grant project aims to improve Dorr St. access for multimodal transportation.

- **Transportation Access:** With major employers like Amazon located at city peripheries, transportation remains a significant barrier for workforce participation. The discontinuation of bus service to some employment centers has exacerbated this challenge, limiting job access for residents without personal vehicles.

The Department of Economic Development views these workforce and infrastructure needs through the lens of a "three-legged stool" - economic development to attract jobs, workforce development to prepare residents for those jobs, and community development to create places where people want to live and work. Addressing these interconnected needs requires coordination across city departments and partner organizations to develop a localized set of interventions.

*Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.*

Several significant public and private investments are underway that will shape Toledo's economic landscape during the planning period:

- **Toledo Trade Center Phase 2:** Following the successful development of Phase 1 which attracted MOBIS North America and created 185 manufacturing jobs, the Toledo Trade Center (former North Towne Mall site) is moving forward with its second phase. This \$100+ million industrial park development will add two additional 285,000 square foot buildings, with the potential to create over 365 more jobs at full capacity. The project represents a major transformation of a long-vacant retail property into a modern employment center in North Toledo.
- **Four Corners Downtown Redevelopment:** Toledo is partnering with the Lucas County Land Bank on the revitalization of four historic skyscrapers at the intersection of Huron and Madison St. in downtown. In 2024, the city leveraged \$5.3 million in grant funding for environmental remediation and secured \$20 million in historic tax credits. The project will transform approximately 500,000 square feet into 360 residential units with ground-floor commercial space, significantly increasing downtown's population and commercial activity.
- **Glass City Innovation Hub:** In 2024, Toledo was designated the first Innovation Hub in Ohio, supported by a \$31.3 million state grant. This collaborative initiative between the University of Toledo, Bowling Green State University, and local industries like O-I Glass, Owens Corning, and First Solar focuses on advancing glass and solar technologies. The innovation hub is projected to create 1,600 new jobs and contribute \$284 million to the local economy, positioning Toledo as a leader in sustainable manufacturing.
- **Infrastructure Enhancement Projects:** The city has secured significant federal funding for infrastructure improvements, including a \$28 million Reconnecting Communities Grant for



Front and Main Streets in East Toledo and a \$20 million RAISE grant for the \$53 million Toledo Social Innovation District (TSID) project. These investments will upgrade water, sanitary, road, and streetscape infrastructure across multiple phases through 2030, creating construction jobs and improving connectivity between neighborhoods and employment centers.

- **Citywide Community Reinvestment Area Program:** In January 2024, Toledo launched the citywide expansion of its Residential Tax Abatement and Commercial/Industrial Tax Abatement programs, extending eligibility to previously excluded areas of South and West Toledo. This initiative is expected to stimulate private investment in housing and commercial projects throughout the city.

**Workforce Development Needs Created:** These developments will require coordinated workforce strategies, including:

- Training in advanced manufacturing skills, particularly in EV components, glass production, and solar technologies
- Development of construction and skilled trades workforce for infrastructure and building renovation projects
- Coordination between economic development agencies and the Lucas County Workforce Development Board to align training with emerging job opportunities
- Enhanced public transportation solutions to connect residents from low-income neighborhoods to new employment centers

**Business Support Needs:** To maximize the impact of these investments, the city will need to:

- Expand the Vibrancy Initiative to activate more commercial spaces in neighborhoods surrounding major development projects
- Provide technical assistance and capital to small businesses that can become suppliers or service providers to larger companies
- Create stronger connectivity between downtown redevelopment and surrounding neighborhoods
- Address regulatory barriers that may impede business growth and expansion

**Infrastructure Needs:** Supporting these economic changes will require:

- Continued investment in brownfield remediation to prepare additional sites for redevelopment
- Streetscape improvements to create better connections between downtown, innovation districts, and residential neighborhoods
- Enhancement of multimodal transportation options to ensure workforce access to employment centers
- Targeted investment in commercial corridor infrastructure in Neighborhood Strategy Revitalization Areas (NSRAs)

The coordination of these investments with the city's housing and community development strategies will be essential to ensure economic benefits reach residents in low-to-moderate income neighborhoods and create pathways to economic opportunity.

*How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?*

Toledo's workforce has both strengths and misalignments with current employment opportunities. Analysis of educational attainment and labor market data reveals several key patterns:

Looking at educational attainment by employment status (MA-45: Fig. 5), there is a clear correlation between education level and employment outcomes. Toledo residents with less than a high school diploma face a 15.6% unemployment rate, significantly higher than the 8.7% rate for high school graduates, 6.1% for those with some college or associate's degrees, and just 3.1% for those with bachelor's degrees or higher. This pattern aligns with the ongoing shift toward more skilled positions in Toledo's economy.

The income benefits of education are substantial, with median earnings ranging from \$24,420 for those without a high school diploma to \$61,100 for those with graduate or professional degrees (MA-45: Fig. 7). This represents a 150% earnings premium for advanced education, highlighting the economic value of educational attainment in Toledo's labor market.

Despite the employment advantages of higher education, Toledo's workforce includes significant numbers of working-age adults with limited educational credentials. Among residents aged 25-65, a substantial portion have a high school diploma or less, potentially limiting their ability to access higher-paying jobs in growth sectors like healthcare, education, and professional services.

There are notable mismatches between workforce skills and job opportunities:

1. **Sector-specific imbalances:** Toledo has more workers than jobs in sectors like Transportation and Warehousing (4,823 worker surplus) and Retail Trade (925 worker surplus), while experiencing worker shortages in growing sectors like Health Care and Social Assistance (7,163 worker deficit) and Educational Services (4,244 worker deficit). This suggests a need for retraining programs focused on transitioning workers to in-demand fields.
2. **Geographic barriers:** According to data from the Department of Economic Development, many growing employment centers are located at the city's periphery or in neighboring communities, while unemployment remains highest in central city neighborhoods. Despite 83.2% of residents having commutes under 30 minutes (MA-45: Fig. 4), transportation barriers remain significant for those without personal vehicles, particularly as some bus services to employment centers have been discontinued.
3. **Skills gap challenges:** Toledo experiences the paradox of high unemployment alongside unfilled positions. Companies report difficulty finding qualified applicants for available positions, particularly in manufacturing, technical trades, and healthcare support roles.

The city's economic development strategy appropriately recognizes this disconnect, with efforts to (1) attract export-oriented businesses that provide higher wages to areas closer to residential neighborhoods through brownfield redevelopment, (2) improve transportation connectivity between neighborhoods and employment centers, and (3) strengthen coordination between economic development initiatives and workforce training programs provided through the Lucas County Workforce Development Board.

Addressing these misalignments will require continued focus on accessible education and training pathways, particularly for middle-skill occupations that require more than a high school diploma but less than a four-year degree. Such positions often provide family-sustaining wages while being accessible to residents who may not complete bachelor's degrees.

*Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.*

The City of Toledo collaborates with the Lucas County Workforce Development Board (LCWDB) to ensure the development of locally driven training and placement programs that offer high quality education to potential employees and technical assistance to new and established businesses, consistent with their specific needs. Delivering innovative workforce solutions to businesses and job seekers to accelerate regional economic growth and individual prosperity is the mission of LCWDB.

As part of LCWDB's Strategic Plan, there are five overarching goals:

- Goal 1: Prepare a pipeline of work-ready individuals based upon the needs of employers.
- Goal 2: Provide proactive and adaptable business services and solutions through meaningful employer engagement.
- Goal 3: Provide holistic, customer-centric, streamlined, and team-based career services.
- Goal 4: Enhance public perception of the Lucas County workforce system by providing effective, timely, and accurate communication.
- Goal 5: Establish the Lucas County Workforce Development Board as the central hub of workforce development services in Lucas County.

Critically, the LCWDB seeks to collaborate with business and industry to promote the value and applicability of industry recognized credentials by expanding participation in the WorkReady Lucas County program, an initiative using the ACT National Career Readiness Certificate to help job seekers sharpen their vital workplace skills and employers to find and develop the skilled workers they need to grow their businesses. This is done through convening sector-specific employer advisory panels, paying particular attention to high-demand industries such as advanced Manufacturing, Health Care and Transportation and Warehousing to identify credentials preferred by regional employers in these in-demand occupations. This framework seeks to promote the difference between jobs and careers, stressing the concept of career pathways, and providing access to training programs that will assist jobseekers in advancing in their careers.

The LCWDB is currently developing its five-year strategic plan with increased coordination between economic development and workforce development professionals. The Department of Economic Development has recently begun participating more actively on the Workforce Investment Board to strengthen the connection between business attraction efforts and workforce preparation. This enhanced coordination will help ensure that workforce training programs align with the specific needs identified during business retention visits and new business recruitment.

Toledo's workforce ecosystem includes several additional initiatives. OhioMeansJobs provides free services including assessments, basic skills training, business services, recruitment, career exploration, job matching, and job placement. The state's TechCred program supports the upskilling of current workers in technology fields. Additionally, JobsOhio offers targeted training dollars for specific job creation projects.

These workforce initiatives directly support the Consolidated Plan by preparing residents from low-to-moderate income neighborhoods for quality employment opportunities, particularly in the manufacturing, healthcare, and logistics sectors that offer above-median wages. As the city revitalizes commercial corridors and repositions brownfield sites for job-creating developments, coordinated workforce training ensures that residents can access employment opportunities, thereby addressing housing affordability challenges through increased household income.

*Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?*

Yes.

*If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.*

Toledo is actively involved in regional economic development planning through multiple frameworks. While the city is not directly participating in the state's CEDS, Toledo is in the process of updating its local CEDS and working with the Toledo Metropolitan Area Council of Governments (TMACOG) to establish an Economic Development District (EDD) for the Toledo Metropolitan Statistical Area. This initiative will strengthen regional coordination and potentially increase access to federal economic development funding.

Several economic development initiatives that align with the Consolidated Plan's goals include:

1. **Toledo Trade Center Development:** The continued development of this industrial park in North Toledo aligns with the Consolidated Plan's goal of creating economic opportunities in low-to-moderate income areas. Building 1 is already occupied by MOBIS, creating 185 jobs, with Buildings 2 and 3 expected to create hundreds more positions accessible to nearby residents.
2. **Vibrancy Initiative:** This program, which received nearly \$1 million in 2024 funding (including CDBG funds), supports façade improvements and white box renovations of commercial properties. The initiative strategically prioritizes projects in Neighborhood

Strategy Revitalization Areas (NSRAs) designated in the Consolidated Plan, with 67% of awarded properties being historic structures dating to the 1800s.

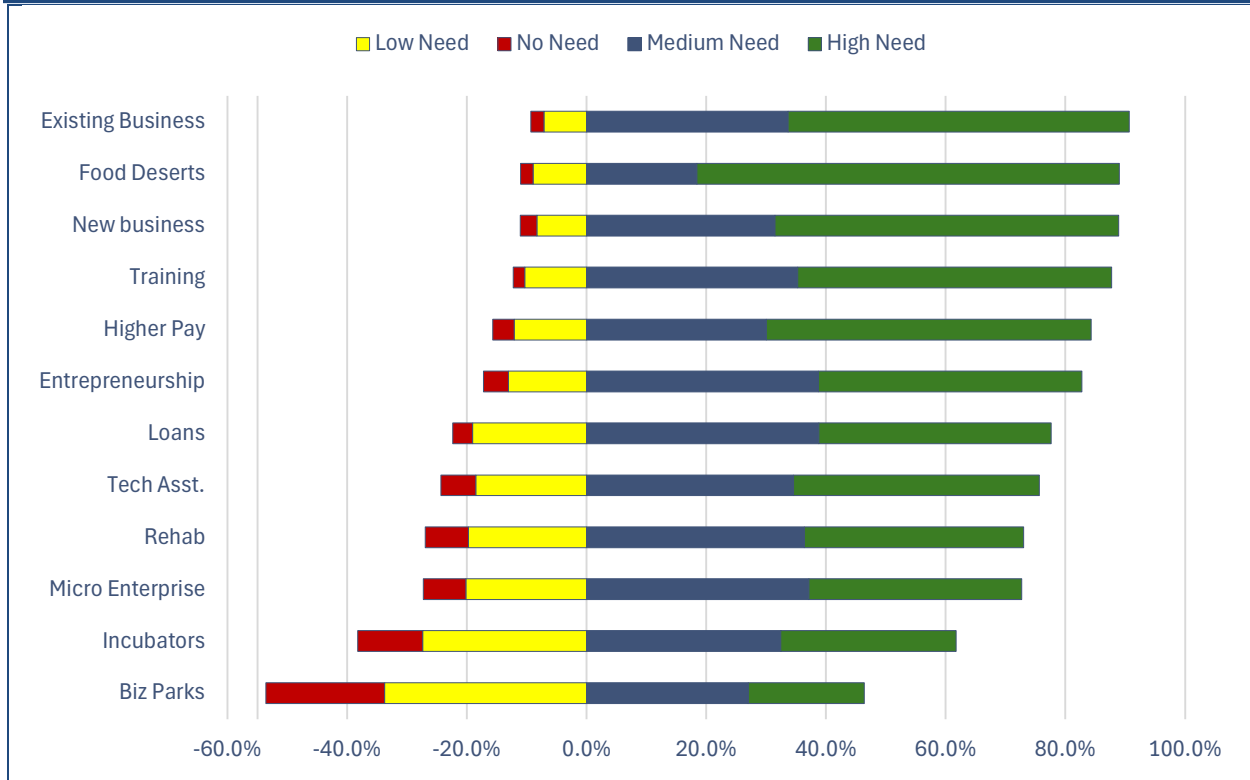
3. **Brownfield Redevelopment Strategy:** The city's focus on remediating and repositioning former industrial sites and vacant commercial properties creates job centers closer to low-income neighborhoods. This approach specifically targets improving access to employment for residents in NSRAs by bringing higher-wage jobs to accessible locations within the city rather than peripheral areas.
4. **Legacy Corridor Business Resilience Program:** Launched in 2024 with a \$100,000 allocation, this program supports businesses affected by major infrastructure projects like the Broadway Street Reconstruction. This coordination between economic development and infrastructure improvements helps maintain business vitality during public investments.
5. **Toledo Social Innovation District (TSID):** This initiative focuses on developing new technologies to improve the region's economic competitiveness while strengthening opportunities for low-income, minority, and people of color living in the most distressed neighborhoods adjacent to downtown. The \$53 million RAISE grant project will provide improved infrastructure in the TSID with construction beginning in 2027.

These economic development initiatives directly support the Consolidated Plan by creating employment opportunities, revitalizing commercial areas in targeted neighborhoods, and generating economic activity that can help address housing affordability through increased household incomes. The Department of Economic Development's 2025 Strategic Plan emphasizes that projects in low-to-moderate income census tracts are a key performance indicator, ensuring alignment with the Consolidated Plan's focus areas.

#### *Discussion*

In addition to consultation with the business community, participants in the CEW Housing & Community Development Survey were asked to prioritize economic development needs. The top needs identified in this survey were: 1) Retention / expansion of existing businesses; 2) Access to Grocery Store / Healthy Food; 3) Attraction of new businesses; 4) Workforce training programs; and 5) Business incentives for higher paying jobs.

MA-45 Figure 8: Top Economic Development Needs



	Definition	No Need	Low Need	Medium Need	High Need
<b>Existing Business</b>	Retention / expansion of existing businesses	2.2%	7.1%	33.7%	57.0%
<b>Food Deserts</b>	Access to Grocery Store / Healthy Food	2.1%	8.9%	18.5%	70.5%
<b>New business</b>	Attraction of new businesses	2.8%	8.3%	31.5%	57.4%
<b>Training</b>	Workforce training programs	1.9%	10.3%	35.3%	52.5%
<b>Higher Pay</b>	Business incentives for higher paying jobs	3.6%	12.1%	30.0%	54.3%
<b>Entrepreneurship</b>	Entrepreneurship programs	4.1%	13.1%	38.8%	44.0%
<b>Loans</b>	Working capital loans for businesses	3.3%	19.1%	38.8%	38.8%
<b>Tech Asst.</b>	Small business technical assistance programs and workshops	5.8%	18.5%	34.6%	41.1%

	Definition	No Need	Low Need	Medium Need	High Need
<b>Rehab</b>	Façade improvement / building rehabilitation / signage	7.2%	19.7%	36.4%	36.6%
<b>Micro Enterprise</b>	Assistance for micro-enterprises (5 or fewer employees)	7.1%	20.2%	37.2%	35.6%
<b>Incubators</b>	Business incubators / coworking space	10.8%	27.4%	32.5%	29.3%
<b>Biz Parks</b>	Development of business parks	19.9%	33.7%	27.0%	19.4%

**Data Source:** CEW Advisors, Inc. Housing & Community Development Survey

# MA-50 Needs and Market Analysis Discussion

**Are there areas where households with multiple housing problems are concentrated?  
(include a definition of "concentration")**

For this section, the city is defining concentration to mean any area of the city where residents experience any housing problem(s) at a rate of 10 percentage points or more than the rate of the city as a whole. Also, to clarify, among the 118,508 households in the city, there are 1,140 households with substandard housing, 850 households that are overcrowded, and 339 households that are severely overcrowded, around two percent of all households. However, there are 33,510 households that have a housing cost burden or a severe housing cost burden. When “housing problems” are discussed, housing “affordability” is the chief concern.

MA-50 Figure 1: Housing Problems by Census Tract								
	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
Toledo	20.4%	0.3%	0.0%	0.0%	42.4%	1.5%	0.1%	0.0%
39095000201	14.5%	0.0%	0.0%	0.0%	69.9%	0.0%	0.0%	0.0%
39095000202	4.6%	0.0%	0.0%	0.0%	38.2%	0.0%	0.0%	0.0%
39095000301	19.2%	0.0%	0.0%	0.0%	50.1%	0.0%	0.0%	0.0%
39095000302	15.2%	1.2%	0.0%	0.0%	57.3%	0.0%	0.0%	0.0%
39095000400	18.7%	0.0%	0.0%	0.0%	35.3%	0.0%	0.0%	0.0%
39095000601	29.5%	0.0%	0.0%	0.0%	35.2%	0.0%	0.0%	0.0%
39095000602	19.3%	0.0%	0.0%	0.0%	33.9%	0.0%	0.0%	0.0%
39095000701	59.1%	0.0%	0.0%	0.0%	72.7%	0.0%	0.0%	0.0%
39095000702	16.1%	0.0%	0.0%	0.0%	30.7%	0.0%	0.0%	0.0%
39095000703	43.9%	0.0%	0.0%	0.0%	46.5%	0.0%	0.0%	0.0%
39095000800	32.3%	1.2%	0.0%	0.0%	43.9%	0.0%	0.0%	0.0%
39095000900	10.7%	1.0%	0.0%	0.0%	62.9%	0.0%	0.0%	0.0%
39095001001	60.3%	0.0%	0.0%	0.0%	16.1%	0.0%	0.0%	0.0%
39095001002	15.6%	0.0%	0.0%	0.0%	59.7%	0.0%	0.0%	0.0%



	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
39095001100	26.8%	0.0%	0.0%	0.0%	75.3%	0.0%	0.0%	0.0%
39095001201	12.4%	0.0%	0.0%	0.0%	43.5%	0.0%	0.0%	0.0%
39095001202	26.9%	0.0%	0.0%	0.0%	29.9%	3.7%	7.0%	0.0%
39095001301	3.5%	0.0%	0.0%	0.0%	31.8%	0.0%	0.0%	0.0%
39095001302	4.6%	0.0%	0.0%	0.0%	50.5%	0.2%	0.0%	0.0%
39095001303	22.9%	0.8%	0.0%	0.0%	33.4%	0.0%	0.0%	0.0%
39095001400	12.1%	0.0%	0.0%	0.0%	51.3%	0.0%	0.0%	0.0%
39095001500	41.2%	0.0%	0.0%	0.0%	79.8%	0.0%	0.0%	0.0%
39095001601	44.3%	0.0%	0.0%	0.0%	70.3%	0.0%	0.0%	0.0%
39095001602	21.6%	0.0%	0.0%	0.0%	70.6%	0.0%	0.0%	0.0%
39095001700	4.6%	0.0%	0.0%	0.0%	32.5%	0.0%	0.0%	0.0%
39095001800	39.1%	4.2%	0.0%	0.0%	71.7%	8.9%	0.0%	0.0%
39095001900	20.5%	0.0%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%
39095002000	25.1%	0.0%	0.0%	0.0%	20.4%	3.7%	0.0%	0.0%
39095002100	17.4%	0.0%	0.0%	0.0%	45.1%	0.0%	0.0%	0.0%
39095002401	13.3%	0.0%	0.0%	0.0%	51.4%	2.6%	0.0%	0.0%
39095002402	21.9%	0.0%	0.0%	0.0%	41.4%	0.0%	0.0%	0.0%
39095002500	18.6%	0.0%	0.0%	0.0%	61.6%	0.0%	0.0%	0.0%
39095002600	31.4%	0.0%	0.0%	0.0%	62.7%	0.0%	0.0%	0.0%
39095002700	n/a`	n/a	n/a	n/a	30.3%	0.0%	0.0%	0.0%
39095002800	0.0%	0.0%	0.0%	0.0%	21.8%	0.0%	0.0%	0.0%
39095002900	9.5%	0.0%	0.0%	0.0%	44.7%	2.2%	0.0%	0.0%
39095003000	31.8%	9.4%	0.0%	0.0%	47.7%	0.0%	0.0%	0.0%

	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
39095003100	29.8%	0.0%	0.0%	0.0%	13.3%	0.0%	0.0%	0.0%
39095003200	48.0%	0.0%	0.0%	0.0%	24.3%	0.0%	0.0%	0.0%
39095003300	23.1%	0.0%	0.0%	0.0%	44.8%	0.0%	0.0%	0.0%
39095003500	16.1%	0.0%	0.0%	0.0%	21.6%	0.0%	0.0%	0.0%
39095003600	36.7%	0.0%	0.0%	0.0%	43.9%	0.0%	0.0%	0.0%
39095003901	19.9%	0.0%	0.0%	0.0%	48.1%	0.0%	0.0%	0.0%
39095003902	11.5%	3.8%	0.0%	0.0%	46.2%	0.0%	0.0%	0.0%
39095004000	16.2%	0.0%	0.0%	0.0%	86.3%	0.0%	0.0%	0.0%
39095004200	59.7%	0.0%	0.0%	0.0%	53.1%	0.0%	0.0%	0.0%
39095004401	4.6%	0.0%	0.0%	0.0%	74.6%	0.0%	0.0%	0.0%
39095004402	9.4%	0.0%	0.0%	0.0%	22.8%	0.0%	0.0%	0.0%
39095004501	16.1%	0.0%	0.0%	0.0%	32.2%	0.0%	0.0%	0.0%
39095004503	22.6%	0.0%	0.0%	0.0%	52.6%	0.0%	0.0%	0.0%
39095004504	18.3%	0.0%	0.0%	0.0%	37.7%	0.0%	0.0%	0.0%
39095004600	8.4%	0.0%	0.0%	0.0%	25.8%	0.0%	0.0%	0.0%
39095004701	24.5%	0.0%	0.0%	0.0%	60.4%	0.0%	0.0%	0.0%
39095004702	30.3%	2.7%	1.0%	0.0%	36.2%	4.6%	0.0%	0.0%
39095004800	37.9%	0.0%	0.0%	0.0%	71.1%	0.0%	0.0%	0.0%
39095004900	3.5%	0.0%	0.0%	0.0%	42.0%	9.4%	0.0%	0.0%
39095005000	14.7%	0.0%	0.0%	0.0%	48.3%	7.8%	0.0%	0.0%
39095005101	14.9%	0.0%	0.0%	0.0%	36.4%	0.0%	0.0%	0.0%
39095005102	12.1%	0.0%	0.0%	0.0%	27.3%	3.2%	0.0%	0.0%
39095005200	28.4%	0.0%	0.0%	0.0%	32.8%	6.3%	0.0%	0.0%

	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
39095005300	20.8%	0.3%	0.0%	0.0%	49.9%	3.5%	0.0%	0.0%
39095005400	14.7%	0.0%	0.0%	0.0%	58.9%	4.7%	0.0%	0.0%
39095005501	31.0%	0.0%	0.0%	0.0%	58.8%	5.5%	0.0%	0.0%
39095005502	11.8%	0.0%	0.0%	0.0%	16.9%	0.0%	0.0%	0.0%
39095005503	19.1%	0.0%	0.0%	0.0%	17.4%	0.0%	0.0%	0.0%
39095005601	10.4%	0.0%	0.0%	0.0%	37.5%	0.0%	0.0%	0.0%
39095005602	23.3%	0.0%	0.0%	0.0%	19.6%	0.0%	0.0%	0.0%
39095005701	19.3%	0.0%	0.0%	0.0%	35.5%	2.5%	0.0%	0.0%
39095005703	28.9%	0.0%	0.0%	0.0%	32.5%	0.0%	0.0%	0.0%
39095005704	32.2%	0.0%	0.0%	0.0%	44.6%	0.0%	0.0%	0.0%
39095005705	39.4%	0.0%	0.0%	0.0%	13.9%	0.0%	0.0%	0.0%
39095005801	17.0%	0.0%	0.0%	0.0%	22.6%	0.2%	0.0%	0.0%
39095005803	15.3%	0.0%	0.0%	0.0%	50.5%	0.0%	0.0%	0.0%
39095005804	21.3%	0.0%	0.0%	0.0%	53.2%	0.0%	0.0%	0.0%
39095005901	18.8%	0.0%	0.0%	0.0%	84.2%	0.0%	0.0%	0.0%
39095005902	20.5%	0.0%	0.0%	0.0%	32.6%	0.0%	0.0%	0.0%
39095006000	13.2%	4.9%	0.0%	0.0%	56.0%	0.0%	0.0%	0.0%
39095006100	13.1%	0.0%	0.0%	0.0%	29.3%	0.0%	0.0%	0.0%
39095006200	6.8%	0.0%	0.0%	0.0%	56.4%	0.0%	0.0%	0.0%
39095006300	13.5%	0.0%	0.0%	0.0%	36.0%	0.0%	0.0%	0.0%
39095006400	8.6%	0.0%	0.0%	0.0%	4.4%	0.0%	0.0%	0.0%
39095006500	8.3%	0.0%	0.0%	0.0%	46.3%	0.0%	0.0%	0.0%
39095006600	44.3%	0.0%	0.0%	0.0%	20.2%	0.0%	0.0%	0.0%

	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
39095006700	22.5%	0.0%	0.0%	0.0%	60.4%	3.3%	0.0%	0.0%
39095006801	40.2%	0.0%	0.0%	0.0%	28.3%	0.5%	0.0%	0.0%
39095006802	32.7%	0.0%	0.0%	0.0%	40.2%	0.3%	0.0%	0.0%
39095006900	18.1%	0.0%	0.0%	0.0%	44.9%	0.0%	0.0%	0.0%
39095007002	15.7%	0.0%	0.0%	0.0%	50.3%	0.0%	0.0%	0.0%
39095007202	17.1%	0.0%	0.0%	0.0%	37.5%	9.4%	0.0%	0.0%
39095007204	26.1%	0.0%	0.0%	0.0%	14.8%	0.0%	0.0%	0.0%
39095007206	15.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
39095007207	30.1%	0.0%	0.0%	0.0%	62.7%	11.0%	0.0%	0.0%
39095007208	17.1%	0.0%	0.0%	0.0%	42.5%	11.9%	0.0%	0.0%
39095007209	18.5%	0.0%	0.0%	0.0%	38.8%	0.0%	0.0%	0.0%
39095007302	38.6%	1.6%	0.0%	0.0%	34.8%	0.0%	0.0%	0.0%
39095007304	13.7%	0.0%	0.0%	0.0%	21.7%	9.9%	0.0%	0.0%
39095007305	9.8%	0.0%	0.0%	0.0%	50.7%	0.0%	0.0%	0.0%
39095007306	39.5%	0.0%	0.0%	0.0%	53.9%	0.0%	0.0%	0.0%
39095007307	0.0%	0.0%	0.0%	0.0%	49.7%	3.5%	0.0%	0.0%
39095007401	21.5%	0.0%	0.0%	0.0%	44.6%	0.0%	0.0%	0.0%
39095007402	17.0%	1.6%	0.0%	0.0%	60.0%	0.0%	0.0%	0.0%
39095007501	2.8%	0.0%	0.0%	0.0%	55.1%	0.0%	0.0%	0.0%
39095007502	26.0%	0.0%	0.0%	0.0%	54.3%	4.3%	0.0%	0.0%
39095007700	20.0%	0.0%	0.0%	0.0%	38.2%	0.0%	0.0%	0.0%
39095007801	16.5%	0.0%	0.0%	0.0%	49.2%	0.0%	0.0%	0.0%
39095007802	30.3%	0.0%	0.0%	0.0%	26.0%	1.2%	0.0%	0.0%

	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
39095007901	16.8%	0.7%	0.0%	0.0%	39.8%	10.2%	0.0%	0.0%
39095007903	11.7%	0.0%	0.0%	0.0%	14.7%	0.0%	0.0%	0.0%
39095007904	24.1%	0.0%	0.0%	0.0%	76.3%	0.0%	0.0%	0.0%
39095008000	23.2%	0.0%	0.0%	0.0%	51.9%	0.0%	0.0%	0.0%
39095008302	11.8%	0.0%	0.0%	0.0%	75.9%	0.0%	0.0%	0.0%
39095008303	17.3%	1.1%	0.0%	0.0%	42.7%	0.0%	0.0%	0.0%
39095008304	18.7%	0.0%	0.0%	0.0%	34.9%	1.9%	0.0%	0.0%
39095008401	10.6%	0.0%	0.0%	0.0%	53.9%	0.0%	0.0%	0.0%
39095008501	12.9%	0.0%	0.0%	0.0%	46.4%	0.0%	0.0%	0.0%
39095008502	9.8%	0.0%	0.0%	0.0%	35.9%	1.2%	3.2%	0.0%
39095008601	6.9%	0.0%	0.0%	0.0%	43.1%	0.0%	0.0%	0.0%
39095008602	14.2%	0.0%	0.0%	0.0%	28.1%	0.3%	0.0%	0.0%
39095009902	25.3%	0.0%	0.0%	0.0%	2.2%	0.0%	0.0%	0.0%
39095010200	20.3%	0.0%	0.0%	0.0%	34.5%	6.4%	0.0%	0.0%
39095010300	21.0%	5.9%	0.0%	0.0%	52.6%	5.1%	0.0%	0.0%
39095010400	0.0%	0.0%	0.0%	0.0%	57.1%	0.0%	0.0%	0.0%

Data Source: 2019-2023 ACS – B25123

*Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")*

Based on the available data, there are significant racial (primarily Black/African American) and ethnic concentrations in certain Census tracts within Toledo. Additionally, these areas also correspond to some of the lowest-income tracts within the city.

Regarding the Black/African American population, census tracts 31, 35, 32, 36, 33, 34, 26, 25, 24.02, 21, 16, 22, and 23 have concentrations of Black/African American households that are greater than 50 percent. These tracts are clustered just west of the downtown and north of the Maumee River, and comprise the neighborhoods of Junction, Englewood, Overland, and Auburndale. Outside of the immediate core of the city the Black/African American population is

still high and spans across the city moving from the southwest (Eastgate) to the northeast (Manhattan Park).

Regarding the Hispanic/Latino population, Census tracts 54, 103, 47.02, and 53 have concentrations of Hispanic/Latino residents that exceed 22 percent. These tracts are clustered in the southeast of the city and located south of the Maumee River. Neighborhoods with higher concentrations include Old South End, Middlegrounds, Oakdale, Raymer, and Ravine Park.

According to ACS data from 2019-2023, the median household income of Toledo is quite low at \$47,532 compared to \$60,095 for Lucas County, and \$69,680 for the state of Ohio. Median household income in Toledo is about 79 percent of the county's and 68 percent of the state's. This affects how much households are able to spend on housing, transportation, childcare, healthcare, food, as well as entertainment in and around the city. Analyzing income data at the Census tract level shows various nuances across the city. There are several Census tracts which have median household incomes lower than \$20,000. These include tracts 12.02, 19, 29, 22, 23, 28, 33, 34, 37, and are clustered around downtown Toledo, extending to the northeast along the Maumee River to Manhattan Marsh Preserve Metropark. These tracts align with the neighborhoods of: Junction, Englewood, Upton, Vistula, and Warren-Sherman and coincide with the Census tracts which have the highest percentages of Black/African American residents.

There are three additional census tracts with median household income less than \$20,000. These are census tract 15 (Auburn-Delaware neighborhood), census tract 47.02 (East Toledo), and census tract 4 (this contains the University of Toledo and is likely impacted by the college students living in the neighborhood).

An important metric regarding income is the percentage of Low and Moderate Income (LMI) households. The definition of low or moderate income means households that have incomes at or below 80 percent of the area median income. This metric is used for various HUD related funding programs, such as the Low-Income Housing Tax Credit (LIHTC) and CDGB funding. Like median household income data, many of the census tracts with higher percentages of LMI households also correspond to tracts with higher concentrations of Black/African American and Hispanic residents.

Some of the neighborhoods with the highest percentages (more than 80 percent) of LMI households include Old South End, Vistula, Sherman, Manhattan Park, North River, Warren-Sherman, Upton, and Junction. These areas are made up of census tracts: 12.02, 17, 18, 19, 30, 29, 22, 23, 27, 40, 42, 54, and 48.

*What are the characteristics of the market in these areas/neighborhoods?*

Median home values in the center part of the city are low with a few notable exceptions. The low median home values correspond to areas with the lowest incomes and some of the greatest concentrations of minority residents. The majority of census tracts in the central part of the city have median home values less than \$60,000. One interesting data point is the Warehouse District (census tracts 34 and 37) which has a median home value of \$192,600. This is likely due to the

location of higher end condominiums such as Barley Lofts and Water Street Condos. Additionally, the Old West End neighborhood (census tract 21) has a median home value of \$116,500.

Median home values increase the further away one is from the city center. This radiating effect indicates home values increase based on proximity to the outer edges of the city. Areas with the highest home values are in the northwest and southwest of the city corresponding to Census tracts 72.02, 72.04, 72.05 in the Southwest; 4, 13.01, and 13.02 in the West near Ottawa Hills (with home values ranging from \$150,000 to \$180,000); and 83.01, and 83.02 to the Northwest (with home values in excess of \$200,000. There has been significant inflation of home values over the past several years as discussed in Section MA-15.

Housing vacancy is an issue throughout Toledo; however, there is a predominance of vacancies in census tracts radiating from the downtown area. Vacancy has an impact on neighborhood quality and can be an indicator of market strength and neighborhood health. Since the Great Recession, Toledo has made significant progress in addressing vacant housing units and works with the Lucas County Land Bank on property disposition. Vacancy can arise when homeowners no longer afford the costs of ownership, when title issues arise, or when there is not a strong real estate market to sell an existing home. The following census tracts have vacancy rates greater than 33 percent: Census tracts 8, 14, and 15 (Auburn-Delaware neighborhood); 20 (Riverside neighborhood); 17 (between Lagrange St. and Cherry St.; 26 (Dorr St.); and 36 (Onyx neighborhood).

Based on the data, it appears that low median home values correspond with Census tracts where older homes are more prevalent. The city grew substantially during the 20<sup>th</sup> century and much of the housing stock reflects that period of development. Housing structures found in and around the central core have a median age of over 75-years-old, while in the outlying areas of the city housing units have a median age range from 35 to 55. Older homes can also correlate with issues around lead paint, outdated mechanical and electrical systems, and added maintenance over time.

<i>Are there any community assets in these areas/neighborhoods?</i>
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Yes. Despite financial, economic, and housing challenges in these areas, there are community assets such as community centers, grocery stores, community organizations, and neighborhood associations. While some of these assets are spread throughout the city, many are clustered around the downtown. Below is a list (not exhaustive) of some of the community assets found in Toledo which service challenged neighborhoods:

Community Centers:

- St. Paul Community Center
- South Side Community Health
- Grace Community Center
- Oswald Center
- Al-Madinah Community Center

- River East Community Health Center
- J Frank Troy Senior Center
- Fredrick Douglass Community Center
- Lighthouse Community Center

#### Grocery Stores

- Toledo Food Market
- Save A Lot
- Kroger
- Food Town
- Toledo Market
- Family Food Center
- Stop & Shop

#### Community Organizations

- United Way of Toledo
- Toledo Community Foundation
- Partners in Education
- YMCA of Greater Toledo
- Boys & Girls Club of Toledo
- Feed Lucas County Children Inc.

<p><i>Are there other strategic opportunities in any of these areas?</i></p>
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Regarding existing neighborhoods and census tracts which are both challenged economically and have concentrations of minority and ethnic populations, there are a few strategic opportunities which can be availed from the standpoint of economic and workforce development. One of the key findings is that education levels are low in distressed neighborhoods, and in-turn perpetuate lower incomes and higher rates of poverty. A strategic opportunity in the area is to invest in residents and train the workforce so they can share in the general economic prosperity of the region. While there are existing programs offered by community organizations around job-placement and skills-building, these programs could be enhanced with added collaboration with the city.

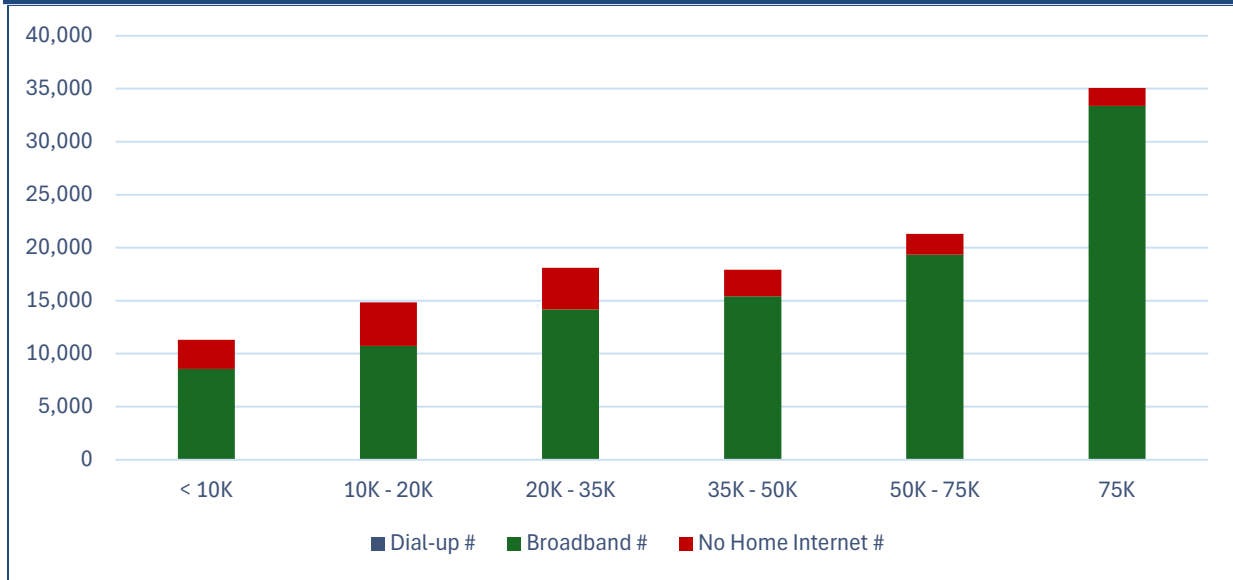
On the physical development side, there are many homes in the area which have low median values. One strategic opportunity is to target investment dollars towards neighborhoods with the greatest needs. Some of the most economically challenged communities appear to have undergone demolition programs to remove blight and abandoned properties. The city should target at risk neighborhoods and create neighborhood level plans which bring together stakeholders and create community goals and a shared vision for the future. The city could then actively work with the community to achieve those goals.



# MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

MA-60 Figure 1: Home Internet Connection by Household Income



	Dial-up		Broadband		No Home Internet	
	#	%	#	%	#	%
< 10K	55	0.5%	8,507	75.3%	2,736	24.2%
10K - 20K	18	0.1%	10,713	72.2%	4,102	27.7%
20K - 35K	6	0.0%	14,173	78.3%	3,913	21.6%
35K - 50K	29	0.2%	15,386	85.9%	2,495	13.9%
50K - 75K	0	0.0%	19,335	90.8%	1,959	9.2%
75K +	0	0.0%	33,387	95.2%	1,694	4.8%
<b>Total</b>	<b>108</b>	<b>0.1%</b>	<b>101,501</b>	<b>85.6%</b>	<b>16,899</b>	<b>14.3%</b>

Data Source: 2019-2023 ACS – B28004

Toledo households require robust broadband infrastructure to participate fully in today's increasingly digital economy, education system, and society. Analysis of current broadband conditions reveals significant connectivity challenges, particularly for low- and moderate-income households.

The mapping tool from Broadband Ohio<sup>4</sup> indicates that 50Mbps internet is available throughout Toledo, however the 2019-2023 American Community Survey (ACS) data demonstrate a direct correlation between household income and broadband adoption:

- Only 75.3% of households earning less than \$10,000 have broadband connections, with 24.2% having no internet access
- 72.2% of households earning \$10,000-\$20,000 have broadband, with 27.7% lacking any internet connection
- 78.3% of households earning \$20,000-\$35,000 have broadband
- The digital divide narrows as income increases, with 95.2% of households earning over \$75,000 having broadband

This points to two potential challenges for low- and moderate- income families.

Firstly, affordability would seem to be the most obvious issue. This would point to a need to make broadband more affordable for lower income families through price caps, vouchers, subsidies, or other programs.

Secondly, it is possible that the Broadband Ohio map is not capturing infrastructure gaps in certain neighborhoods. This would point to the potential need for targeted infrastructure improvements to ensure broadband is accessible to homes throughout the city.

*Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.*

Toledo's residential broadband market demonstrates limited effective competition, with most areas served by only 1-2 high-speed providers. Data from broadbandmap.com shows Buckeye CableSystem dominates the cable market with 63% coverage, while AT&T provides fiber service to 43% of the area. Most other providers have minimal coverage (under 5%) or offer less reliable technologies. This concentrated market structure limits consumer choice, particularly in low-income areas where the digital divide is most pronounced.

Increased competition from multiple broadband providers would directly address Toledo's digital equity challenges by driving down prices, improving service quality, and expanding infrastructure

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<sup>4</sup> <https://geohio.maps.arcgis.com/apps/MapSeries/index.html?appid=64008bdfcc8041379f74a7d14be72e38>

investment. When providers compete, they are incentivized to offer more affordable plans that can benefit the 24.2% of low-income households currently without internet access. Competition also promotes service reliability and customer satisfaction as providers work to retain customers who have alternatives. Additionally, competing providers are more likely to expand coverage to underserved neighborhoods to capture market share, helping close the current infrastructure gaps that affect 42% of Lucas County's populated area.

# MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

*Describe the jurisdiction's increased natural hazard risks associated with climate change.*

Based on the Lucas County Multi-Jurisdictional Hazard Mitigation Plan, climate change is contributing to several increased natural hazard risks.<sup>5</sup>

1. **Flooding and Heavy Rainfall Events:** The plan notes that there has been an increase in precipitation across the U.S., with some areas experiencing higher than the national average. In Lucas County, this has led to more frequent and severe flooding events, particularly flash floods. The document records 38 flood and flash flood events between 1996-2018, with significant property damage (\$62.4 million). For Toledo specifically, the city has implemented numerous storm sewer improvement projects (Bancroft Outfall, Tiff Ditch, Jamison Ditch, Silver Creek Ditch) to address increased capacity needs resulting from changing precipitation patterns.
2. **Harmful Algal Blooms (HABs):** Climate change has exacerbated HAB occurrences in Lake Erie, which directly impacts Toledo's drinking water supply. In 2014, Toledo experienced a water crisis when toxins from HABs contaminated the drinking water supply, affecting 500,000 residents. The plan shows that HAB severity has increased significantly since 2002, with particularly severe blooms in recent years.
3. **Extreme Temperature Events:** The plan documents both extreme heat and cold events. As climate patterns shift, Toledo faces increased risk of more frequent and intense heat waves, which pose public health risks particularly to vulnerable populations. The urban heat island effect is specifically noted as a concern for Toledo as the county's most densely populated area.
4. **Severe Weather Events:** The plan indicates that climate change is contributing to more severe storms, including thunderstorms and tornadoes. These events can cause significant damage to infrastructure, particularly power distribution systems, and pose risks to public safety.
5. **Lake Erie Water Level Fluctuations:** Climate change is affecting Lake Erie's water levels, which impacts Toledo through increased risk of lake surge, coastal erosion, and related

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<sup>5</sup> <https://co.lucas.oh.us/DocumentCenter/View/86339/Lucas-County-2019-Multi-Jurisdictional-Hazard-Mitigation-Plan>

flooding. Toledo's location at the western end of Lake Erie makes it particularly vulnerable to these changes.

The plan emphasizes that these climate-related hazards have interconnected impacts on public health, infrastructure, the economy, and the environment. Toledo has implemented various mitigation measures, including updated floodplain regulations, green infrastructure projects, and water treatment improvements to address these increasing risks.

*Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.*

In Toledo, the impacts of climate-related hazards are not distributed equally across all neighborhoods and populations. As climate change intensifies natural hazards like flooding, extreme temperatures, and severe storms, housing occupied by low- and moderate-income households faces disproportionate risks and challenges.

Neighborhoods with higher concentrations of low- and moderate- income households feature older housing stock with structural deficiencies, inadequate insulation, aging electrical systems, and less effective drainage—all factors that increase susceptibility to climate hazards.

Geographic analysis reveals that many low-income neighborhoods in Toledo are situated in areas with elevated flood risks, particularly in east Toledo and areas adjacent to the Maumee River. Data from the Hazard Mitigation Plan identifies 53 repetitive loss properties in Toledo due to flooding, with a significant number located in economically disadvantaged areas. These neighborhoods also frequently suffer from aging infrastructure, with stormwater systems designed for historical rainfall patterns that are increasingly overwhelmed by the more intense precipitation events associated with climate change.

The urban heat island effect presents another climate-related challenge disproportionately affecting low-income residents. Dense urban areas with limited green space experience higher temperatures during heat waves, creating public health risks especially for vulnerable populations like the elderly, children, and those with pre-existing health conditions—groups often overrepresented in lower-income communities. This risk is compounded by the fact that 11.9% of Toledo residents under 65 lack health insurance, limiting their access to care for heat-related illnesses.

When climate emergencies strike, low-income households face multiple compounding challenges: limited savings for temporary housing, reduced access to reliable transportation for evacuation, fewer resources for home repairs, and often less robust social networks with resources to assist in recovery. Many must choose between paying for disaster repairs or meeting basic needs like food and medicine.

Historical patterns of flooding and extreme weather in Toledo demonstrate that these events do not simply create temporary inconveniences for low-income households, they can trigger cascading financial crises that push families deeper into poverty. What might be a manageable

expense for a middle-income family can become a devastating financial blow for those with limited resources, potentially leading to displacement, homelessness, or dangerous living conditions if repairs cannot be made promptly.

Addressing these disparities requires targeted interventions that recognize the unique vulnerabilities of low- and moderate-income housing in Toledo's changing climate. Investments in infrastructure improvements, housing quality, emergency preparedness, and financial assistance programs will be essential to building resilience among the city's most vulnerable residents as climate-related hazards continue to intensify.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The Strategic Plan section identifies priorities, objectives, strategies, and projected outcomes that the city will seek to accomplish over the next five years. The strategies developed within this Plan focus on affordable housing, homelessness, special needs populations, public services, community development, and economic development.

Most federal grant funded activities are provided Citywide based on income eligibility. Others target the City's low- to moderate-income (LMI) areas or address the needs of LMI limited clientele. The City carries out CDBG funded code enforcement activities in slum and blighted LMI areas. Priority needs were established through widespread consultation and community engagement and rooted in data research and analysis.

While it is challenging to predict future Federal resources based on Congressional appropriations, the city anticipates receiving approximately **\$46.8 million** in total funding over the 5-year period from July 1, 2025 to June 30, 2030. Funding can fluctuate based on allocation methodologies nationally and based on Congressional funding levels. To project allocations for the next 5 years, funding levels for the previous five years were averaged and used as an estimate for future annual allocations for each of the next 5 years. Based on historical funding levels, it is projected that the City of Toledo will receive the following funding amounts for the 2025-2029 Program Years.

- **CDBG:** \$34,434,897
- **HOME:** \$9,264,206
- **ESG:** \$3,123,982

Through the broad-based consultation and citizen participation process described in the Needs Assessment Section, key themes emerged which were notable areas of almost universal agreement. The primary areas of community needs articulated above are as follows:

- **Affordable Housing:** inclusive of affordable homeownership and affordable rental housing, new construction, redevelopment, and conversion
- **Housing Rehabilitation and Modification:** to improve the condition of the city's housing stock and to make modifications to better meet the accessibility needs of seniors and persons with disabilities
- **Homelessness:** respond to the rapid rise of homelessness in the area
- **Public Services:** provide critical services to the city's residents, focusing on services for youth, seniors, the homeless, and providing emergency assistance, mental health services, affordable childcare, adult education and workforce training classes, services for victims of domestic violence, and other populations

- **Infrastructure Improvements:** including street and sidewalks repairs, sewer drainage improvements, and to increase pedestrian safety
- **Facility Improvements:** improvements to facilities that provide services to the city's low- and moderate-income residents
- **Economic Development:** to support the growth of the city's existing businesses and attract new and emerging businesses through a series of incentive programs, brownfield remediation, and tax abatements.

Over the next five years the City of Toledo, in partnership with other key community stakeholders, plans to allocate resources to preserve and expand affordable housing options, improve public facilities and public infrastructure, increase income opportunities, and provide critical supportive services to Toledo low- and moderate-income residents and targeted priority populations based on the most significant demonstrated needs.

Funding priorities based on the needs assessment are to 1) expand housing affordability and local development capacity; 2) provide funding to prevent homelessness and provide adequate transitional and permanent housing; 3) maintain safe and affordable rental housing especially for the elderly; 4) facilitate healthy and attractive neighborhoods through code enforcement, re-use of vacant lots and crime reduction; 5) improve the quantity and/or quality of public facilities 6) increase public services especially for youth and seniors; 7) expand economic opportunities through job creation, and small business/microenterprise assistance; and 8) improve public infrastructure.

The Lucas Metropolitan Housing (LMH) is a high functioning housing authority that owns public housing units and administers housing choice vouchers throughout the city. The LMH self-developed and partnered with for-profit developers to create low-income housing tax credit funded projects and converted public housing projects to project based subsidy assisted units under HUD's Rental Assistance Development (RAD) Program.



# SP-10 Geographic Priorities – 91.215 (a)(1)

## Geographic Area

Table 8 - Geographic Priority Areas		
1	<b>Area Name:</b>	Junction Choice Neighborhood NRSA
	<b>Area Type:</b>	Strategy Area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	April 18, 2023
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The area is bounded by contiguous sections of the Junction and Englewood neighborhood of Census Tracts 26, 33, and 36.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Several private sector and other governmental entities including the Land Bank, a major hospital chain, a community development financial intermediary, and a NeighborWorks affiliate are working in and investing in the area. The area population is 2,966 with about 70% of the households with incomes at or below 80% AMI. The unemployment rate is 22.8% and 89% of the housing units were built before 1980. Englewood is west of downtown and consists of moderate to large sized homes with several smaller and identifiable neighborhoods, extensive park space including Smith Park and Robinson Park. Commercial districts can be found along Dorr Street which is undergoing significant investment and redevelopment.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	The City used the boundaries for City and private sector led community planning efforts as a basis for the consultation and citizen participation process to select the area. There are several private sector and other public investments in this area which can be leveraged through strategic investment of HUD funds. In the Con Plan process, staff educated residents, non-profit organizations, businesses, anchor institutions, and other entities on the Con Plan and NRSA requirements. Outreach was aligned with the community plans and included community meetings, a non-profit focus group, and substantial consultation of agencies working in the neighborhoods.
	<b>Identify the needs in this target area.</b>	The specific challenges in this NRSA area include significant housing disinvestment which has led to deterioration in the housing stock and shrinkage of the local business community. There are limited local-facing shops and businesses to serve the community. The neighborhood suffers from deteriorated infrastructure, and there is widespread poverty throughout the area.

	<b>What are the opportunities for improvement in this target area?</b>	A successful neighborhood will have services and assets that serve residents and provide opportunities for employment, and overcome the legacy of commercial vacancy and blighted properties. Given its location near downtown, the Junction Neighborhood is in close proximity to some of the best jobs and employment opportunities in the region, the best health care facilities, the best libraries, as well as a range of options for quality education. The city received a \$20 million investment from the U.S. Department of Transportation through the RAISE grant program to comprehensively modernize roadway and utility infrastructure in the Junction and Uptown neighborhoods. The main commercial thoroughfare, Dorr St., will receive significant upgrades, improving safety and mobility for area residents, particularly pedestrians and cyclists. There are planned investments in economic development business loans, lead service line replacement, park improvements and LED streetlight conversions. Other investments include rehabilitation of single-family rental housing and conversion to homeownership units. Private sector grants to support capacity building, community engagement, income stability, and leadership development. Developing a Home Repair Loan Program to preserve owner-occupied housing and maintain homeownership and neighborhood investment. New scattered site single family housing stock by the Land Bank to attract moderate and middle-income families. Reuse of City and land bank owned vacant lots.
	<b>Are there barriers to improvement in this target area?</b>	Barriers are distressed markets with low returns for new construction and land use and zoning laws that are barriers to in-fill new construction projects. Lack of predevelopment and patient capital, construction financing, and end mortgages. Lack of assisted housing for re-entry populations, poor quality existing housing that impacts marketing of area. Unresponsive out of town investors is a barrier.
2	<b>Area Name:</b>	Old South End NRSA
	<b>Area Type:</b>	Strategy Area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	12/21/2022
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The area is bounded by an interstate and a major urban thoroughfare through the neighborhood. It is located between the Downtown Central Business District and other recreational facilities. A commercial corridor runs through the community and connects to downtown. The boundaries include Census Tracts 42, 54, and 03.

	<b>Include specific housing and commercial characteristics of this target area.</b>	The area has an existing neighborhood plan developed by the Toledo-Lucas County Plan Commission (TLCPC), the Broadway Corridor Coalition, and the Toledo Design Center. It has high poverty and unemployment rates. There are several private sector and other government entities working in and investing in the area. The population of the area is approximately 5,504 with 80% of the households with incomes at or below 80% AMI (median housing income ranges from \$30,000 to \$35,000). Among the housing units in the NRSA, 92.5% were built before 1980.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Toledo used the boundaries for City and private sector led community planning efforts as a basis for the consultation and citizen participation process to select the area. There are several private sector and other public investments in these areas and the city took the opportunity to coordinate investments for greater and more positive outcomes. In the Consolidated Plan process, staff educated residents, non-profit organizations, businesses, anchor institutions, and outreach was aligned with the community plans and included community meetings, a non-profit focus group, and substantial consultation of agencies working in the neighborhoods.
	<b>Identify the needs in this target area.</b>	The needs of this NRSA include the following: a grocery and basic needs stores; job creation and retention, especially for higher-wage employment; business recruitment and retention; remediation of contaminated sites; demolition and reuse of vacant properties; housing code enforcement and nuisance abatement; housing preservation of owner-occupied single family houses, and park improvements are also a priority.
	<b>What are the opportunities for improvement in this target area?</b>	There are several public and private sector partners that are investing and working in the area. The city has planned investments in economic development business loans, street paving, park improvements, and LED streetlight conversions. Other investments include rehabilitation of single-family rental housing and conversion of these for homeownership units. Private sector grants are also available to support capacity building, community engagement, income stability, and leadership development. Developing a Home Repair Loan Program that will help to preserve owner-occupied housing to maintain homeownership and neighborhood investment.
	<b>Are there barriers to improvement in this target area?</b>	Barriers are distressed markets with low returns for new construction and land use and zoning laws that are barriers to infill new construction. Lack of predevelopment and patient capital, construction financing, and end mortgages. Lack of assisted housing for re-entry populations, lack of subsidy financing, poor quality housing stock impacting the market.
<b>3</b>	<b>Area Name:</b>	Englewood NRSA
	<b>Area Type:</b>	Strategy Area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	12/21/2022
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	

<b>Identify the neighborhood boundaries for this target area.</b>	The Englewood NRSA is located west of the downtown area, and is bounded by West Smead Ave. to the west, I-75 to the north, Monroe/Collingwood to the East, and Dorr Street to the South, comprised primarily of Census Tracts 25 and 26.
<b>Include specific housing and commercial characteristics of this target area.</b>	The Englewood NRSA population consists of 6,127 residents. The racial and ethnic composition consist of 75% African American/Black, about 12% White, and less than 10% Hispanic or Latino. Within the Englewood NRSA, there are 3,791 total housing units. Of those, 45.2% of the residents live in owner-occupied housing units compared to 54.8% of residents living in renter-occupied units. Almost 90% of the housing units were built before 1980, with less than 1% built after 2010. The latest ACS estimates update shows that median home value in Toledo is approximately \$107,000; however, only between \$42,000 and \$59,000 in the Englewood NRSA.
<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	The city took a comprehensive approach and consulted with non-profit organizations, government agencies, housing providers, professional associations, neighborhood groups, the local public housing authority, the Fair Housing Center, and many other regional and local organizations engaged in housing, health, and community and economic development. In the Consolidated Plan process, staff educated residents, non-profit organizations, businesses, anchor institutions, and other entities, and outreach was aligned with the community plans and included community meetings, a non-profit focus group, and substantial consultation of agencies working in the neighborhoods.
<b>Identify the needs in this target area.</b>	<p><b>Increase Median Household Income</b> - The median income in Englewood is \$21,513, with a substantial number of households earning less than \$15,000 per year.</p> <p><b>Housing Conditions</b> - In the Englewood NRSA 56.1% of the residents are living in renter-occupied housing. This exceeds Toledo city-wide percentage of 46.6%. Additionally, 67.6% of the residential structures were built in 1939 or earlier and less than 1% (0.3%) of the structures were built after 2010. This creates challenges for the city and property owners around on-going maintenance and rehabilitation of residential structures, particularly with the lower household incomes Toledo residents.</p> <p><b>Vacancy</b> - The Englewood NRSA has a 31.2% vacancy rate, which is doubled that of the city. With such an old housing stock, vacancy rates will increase due to risks of lead exposure and other hazardous conditions.</p> <p><b>Vacant Lots</b> - An ongoing challenge is the presence of vacant and dilapidated structures. In Englewood, there are 402 vacant lots and 125 vacant structures that are tax delinquent.</p>

	<p><b>What are the opportunities for improvement in this target area?</b></p>	<p><b>Housing Opportunities</b> - Develop housing opportunities available to households with a broad range of incomes to meet the needs for LMI (80% AMI or less) homeowners and renters to attract middle-income households (Up to 120% of AMI). Preservation of existing housing stock is also a need due to the older housing stock is also a need due to the older housing stock in the City's neighborhoods.</p> <p><b>Economic Opportunities</b> - Public infrastructure, housing, and commercial real estate projects are anticipated to generate construction and related jobs over the five-year Consolidated Planning period. Revitalization of vacant commercial space, especially along Dorr Street, will lead to job creation and a more economically vibrant neighborhood.</p> <p><b>Public Services Opportunities</b> - Programs will include financial and technical assistance including working capital, equipment, and workspace improvements for small businesses and microenterprises. The strategy should include support services such as job training, transportation, education, health, and childcare which are public services eligible under CDBG regulations.</p> <p><b>Neighborhood Revitalization Opportunities</b> - In 2021, The city commissioned an assessment of its approach to the enforcement of housing and building codes in a report titled "A More Strategic, Equitable Approach to Housing and Building Code Enforcement in Toledo". Housing and code enforcement are critical in improving living conditions in neighborhoods that have been plagued by substandard housing conditions, vacant, abandoned, and deteriorated properties, one of the goals of the NRSA strategy. The assessment calls for a more proactive, equitable, tailored, strategic approach, strong partnerships, tracking and analysis of enforcement outcome for higher impact results.</p>
4	<p><b>Area Name:</b></p> <p><b>Area Type:</b></p> <p><b>Other Target Area Description:</b></p> <p><b>HUD Approval Date:</b></p> <p><b>% of Low/ Mod:</b></p> <p><b>Revital Type:</b></p> <p><b>Other Revital Description:</b></p> <p><b>Identify the neighborhood boundaries for this target area.</b></p>	<p>Vistula Neighborhood</p> <p>Local Target Area</p> <p></p> <p></p> <p></p> <p>Comprehensive</p> <p></p> <p>The Vistula neighborhood is bounded by Interstate 280 to the North, the Maumee River to the East, Cherry St. to the South, and the Greenbelt Parkway to the West. The Vistula neighborhood is contained in census tracts 29 and 30.</p>

<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>Vistula is Toledo’s oldest neighborhood, featuring a range of Greek Revival and Italianate style homes, many dating back to the 1800s. Vistula has the oldest housing stock in the city of Toledo. There are several types of housing in Vistula, including single-family homes, multi-family dwellings, and senior apartments (e.g., Greenbelt Place Apartments, Northgate Senior Apartments). Some historic homes have been converted into multi-unit housing over time. Vistula is also one of the lowest-income neighborhoods in Toledo, with affordability and the risk of gentrification as key concerns for the residents. The neighborhood has a large number of vacant lots, which reflect the city’s overall population decline, but also presents important opportunities for infill housing and neighborhood green space. Vistula includes a mix of small businesses, such as restaurants, auto service, construction and engineering, and retail shops and salons, along with industrial and legacy commercial uses. Several former industrial buildings are now being repurposed for residential, commercial, or mixed-use (e.g., the Wonder Bread building on Summit Street).</p>
<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>The city took a comprehensive approach and consulted with non-profit organizations, government agencies, housing providers, professional associations, neighborhood groups, the local public housing authority, the Fair Housing Center, and many other regional and local organizations engaged in housing, health, and community and economic development. In the Consolidated Plan process, staff educated residents, non-profit organizations, businesses, anchor institutions, and other entities, and outreach was aligned with the community plans and included community meetings, a non-profit focus group, and substantial consultation of agencies working in the neighborhoods.</p>

<p><b>Identify the needs in this target area.</b></p>	<p><b>Affordable Housing</b> Vistula is one of the lowest-income neighborhoods in Toledo, and residents express a strong need for affordable, quality housing, and there is an explicit aim to promote growth <i>without displacement</i>, reflecting concerns about gentrification and maintaining affordability for current residents.</p> <p><b>Housing Stabilization &amp; Preservation</b> Many historic homes are at risk due to neglect or disrepair. There is a need to stabilize the existing housing stock, prevent further deterioration of the housing stock, and support restoration efforts, especially for historically significant buildings.</p> <p><b>Addressing Vacant Lots</b> The neighborhood contains a large number of vacant or underutilized lots, contributing to blight and disinvestment. Residents support infill development that prioritizes housing, community amenities, and green space.</p> <p><b>Neighborhood Environment &amp; Infrastructure</b> The neighborhood lacks a significant tree canopy, and residents expressed the need for more street trees, green spaces, and public landscaping. The neighborhood has poor sidewalks, wide roadways (like Cherry Street), and a lack of crosswalks or bike infrastructure make pedestrian and cyclist safety a major concern. There is a need for community gathering spaces, recreational amenities, and family-friendly programming. The Riverwalk plan includes ideas like a festival street, skatepark, and family rec center, all reflecting resident priorities.</p> <p><b>Economic Development &amp; Commercial Needs</b> Vistula has a number of small and legacy businesses, many of which would benefit from economic development programs, façade improvements, and visibility through strategic streetscape upgrades. As redevelopment continues, residents stressed the importance of equitable access to jobs, local hiring, and job training related to construction, hospitality, and green industries.</p> <p><b>Social Services &amp; Community Health</b> The lack of a full-service grocery store is a major issue for the neighborhood. The Historic Vistula Foundation has been working to address this by opening a produce stand and planning a neighborhood grocery. Expanded access to mental health services, substance recovery programs, and senior services are also a priority. Residents further noted a lack of after-school and youth programming to serve families in the area and provide enrichment opportunities for young people.</p>
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<p><b>What are the opportunities for improvement in this target area?</b></p>	<p><b>Infill Development on Vacant Lots</b> A high number of vacant lots throughout the neighborhood present space for infill housing, mixed-use buildings, and community spaces. This could include affordable housing, small businesses, urban farms, and pocket parks.</p> <p><b>Historic Preservation and Adaptive Reuse</b> There are many viable architecturally and historically significant buildings in the neighborhood that are available for repurposing for apartments, community centers, local businesses, or cultural venues. This would reinforce the historic identity of the neighborhood, and maintains affordability through rehabilitation vs. new builds.</p> <p><b>Expansion of Recreational and Public Spaces</b> Integration of the Glass City Riverwalk brings potential for parks, public plazas, a skatepark, festival street, and river access that could enhance opportunities for community events, outdoor markets, and youth recreation.</p> <p><b>Enhanced Walkability and Mobility Infrastructure</b> Improving pedestrian and bike infrastructure in the neighborhood, adding sidewalks, street lighting, crosswalks, and protected bike lanes would improve access to Cherry Street and Summit Street corridors which would improve safety, support non-car users, and connect residents to downtown and riverfront amenities.</p> <p><b>Strengthening the Local Business Ecosystem</b> Existing businesses along Summit Street and throughout Vistula could benefit from façade improvements, marketing support, pop-up retail spaces, and business incubators. A more robust local business environment would keep local dollars circulating, create jobs, and improve access to goods and services locally.</p>
<p><b>Are there barriers to improvement in this target area?</b></p>	<p>Barriers to improvements include insufficient funds. Many improvement ideas (infill housing, streetscape upgrades, public space development) require significant public and private funding, which may not be readily available.</p> <p>Vistula has many vacant lots and abandoned properties. Many of these may have unclear or absentee ownership, may be tied up in legal or tax issues, or have been neglected for years. Land assembly for redevelopment can be slow, complicated, and expensive, hindering the pace of revitalization.</p> <p>Additionally, complicated zoning rules, historic district designations, and slow permitting processes can deter investment or delay improvement projects. Adaptive reuse of historic buildings often requires special approvals or compliance with preservation standards. These types of delays or unpredictability in approvals often delay redevelopment efforts.</p>



5	<b>Area Name:</b>	Citywide
	<b>Area Type:</b>	This geographic area covers activities that are not restricted to a particular target area
	<b>Other Target Area Description:</b>	This geographic area covers activities that are not restricted to a particular target area
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	This area encompasses all CDBG-eligible areas of the city.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Low- and moderate-income areas are located throughout the city. The housing and commercial characteristics represent the city as a whole as described above.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Many agencies and the community members were consulted as part of the Consolidated Plan process. It was clear through these discussions that the community needs described above were not limited to specific areas of the city but are prevalent throughout the city.
	<b>Identify the needs in this target area.</b>	The needs of the city are identified in the Needs Assessment section of the Consolidated Plan.
	<b>What are the opportunities for improvement in this target area?</b>	Immediate opportunities for improvements are defined in the projects included in Section AP-38 of the Annual Action Plan.
	<b>Are there barriers to improvement in this target area?</b>	Barriers to improvements include insufficient funds, barriers to affordable housing (including the high cost of real estate) and others.

## General Allocation Priorities

The City of Toledo has four targeted investment areas described above. These include the Englewood NRSA, the Old South End NRSA, the Junction Choice Neighborhood NRSA, and the Vistula Neighborhood. Each of these neighborhoods surrounding downtown Toledo have significant vacancy and disinvestment in its housing stock, lower than average median home values and household incomes, and higher than average unemployment and poverty. They are also strategic opportunities to leverage and catalyze the investments currently being made in the downtown area and surrounding neighborhoods.

The city understand that in order to move the needle in improving neighborhoods, a strategic and targeted approach will be necessary, working with partners such as the Toledo County Land Bank, community organizations, neighborhood associations, and affordable housing developers, to collaboratively work together and align resources in a very focused way for neighborhood improvement, increasing property values, and encouraging homeownership and wealth building within the city's more economically distressed neighborhoods. This will have a catalyzing effect in transforming specific areas of the city which will then spread to other areas of the city.

Simultaneously, the city is aware that there are low- and moderate-income households throughout the city. As such, while the city will be focusing investment in the neighborhoods described above, it is also committed to housing and community development investments throughout the city as

required, subject to funding limitations and CDBG program requirements. Public service activities are eligible to all low- and moderate-income Toledo residents served through partnerships with non-profit organizations. Homelessness services are also available to all those currently homeless or at risk of homelessness. Housing rehabilitation funds are expended throughout the City, based on the qualification of low- and moderate-income applicants. Similarly, funds to support the development of affordable housing will serve low- and moderate-income persons throughout the City, based on real estate opportunities and partnership agreements with non-profit housing developers. Finally, any public facility and infrastructure improvements will be based on evaluation of LMI area benefits.

# SP-25 Priority Needs - 91.215(a)(2)

## Priority Needs

Table 9 – Priority Needs Summary		
1	<b>Priority Need Name</b>	Affordable Housing Development
	<b>Priority Level</b>	High
	<b>Population</b>	<p>Income Level:</p> <ul style="list-style-type: none"> <li>Extremely Low</li> <li>Low</li> <li>Moderate</li> </ul> <p>Family Types:</p> <ul style="list-style-type: none"> <li>Large Families</li> <li>Families with Children</li> <li>Elderly</li> </ul> <p>Homeless:</p> <ul style="list-style-type: none"> <li>Chronic Homeless</li> <li>Individuals</li> <li>Families with Children</li> <li>Veterans</li> <li>Victims of Domestic Violence</li> </ul> <p>Non-Homeless Special Needs:</p> <ul style="list-style-type: none"> <li>Elderly</li> <li>Frail Elderly</li> <li>Persons with Physical Disabilities</li> </ul>
	<b>Geographic Areas Affected</b>	<p>Citywide</p> <p>Englewood NRSA</p> <p>Old South End NRSA</p> <p>Junction Choice Neighborhood NRSA</p> <p>Vistula Neighborhood</p>
	<b>Associated Goals</b>	Affordable Housing Development
	<b>Description</b>	<p>Toledo's Low- and Moderate-Income households need access to high quality, affordable housing options through the creation of new affordable housing units, conversion of existing market rate units to affordable units, and the preservation of existing affordable housing to facilitate the creation of additional affordable rental and homeownership housing. As discussed in the Needs Assessment, nearly one-third of all households in the City of Toledo are cost burdened and residents continually struggle finding affordable units. Lower income households struggle with cost burden at much higher rates than higher income households. Similarly, renter households are more cost burdened than homeowner households. In each of the NRSA areas, cost burden is more severe than in the city as a whole.</p>
	<b>Basis for Relative Priority</b>	<p>Needs Assessment and Market Analysis both demonstrate that housing cost burden is the primary concern in the city. The increasing cost of housing and the limited supply of affordable housing units was a nearly universal concern in conversations with Toledo residents. Additionally, consultation with community organizations, service providers, neighborhood associations, and online survey results all demonstrate that additional affordable housing is a priority.</p>

2	<b>Priority Need Name</b>	Homeownership Opportunities
	<b>Priority Level</b>	High
	<b>Population</b>	<p>Income Level:</p> <ul style="list-style-type: none"> <li>Extremely Low</li> <li>Low</li> <li>Moderate</li> </ul> <p>Family Types:</p> <ul style="list-style-type: none"> <li>Large Families</li> <li>Families with Children</li> <li>Elderly</li> </ul> <p>Homeless:</p> <ul style="list-style-type: none"> <li>Chronic Homeless</li> <li>Individuals</li> <li>Families with Children</li> <li>Veterans</li> <li>Victims of Domestic Violence</li> </ul> <p>Non-Homeless Special Needs:</p> <ul style="list-style-type: none"> <li>Elderly</li> <li>Frail Elderly</li> <li>Persons with Physical Disabilities</li> </ul>
	<b>Geographic Areas Affected</b>	<p>Citywide</p> <p>Englewood NRSA</p> <p>Old South End NRSA</p> <p>Junction Choice Neighborhood NRSA</p> <p>Vistula Neighborhood</p>
	<b>Associated Goals</b>	Homeownership Opportunities
	<b>Description</b>	HOME funds will be used to facilitate more homeownership in the city through a homebuyer downpayment assistance program.
	<b>Basis for Relative Priority</b>	Through consultation, community meetings, and online survey results have shown strong support for homeownership opportunities throughout the city. In particular, there has been a growing conversion of homeownership to rental in the NRSA target areas. Support for more homeownership is a high priority for these neighborhoods.
3	<b>Priority Need Name</b>	Housing Improvements
	<b>Priority Level</b>	High

	<b>Population</b>	<p>Income Level:</p> <ul style="list-style-type: none"> <li>Extremely Low</li> <li>Low</li> <li>Moderate</li> </ul> <p>Family Types:</p> <ul style="list-style-type: none"> <li>Large Families</li> <li>Families with Children</li> <li>Elderly</li> </ul> <p>Homeless:</p> <ul style="list-style-type: none"> <li>Chronic Homeless</li> <li>Individuals</li> <li>Families with Children</li> <li>Veterans</li> <li>Victims of Domestic Violence</li> </ul> <p>Non-Homeless Special Needs:</p> <ul style="list-style-type: none"> <li>Elderly</li> <li>Frail Elderly</li> <li>Persons with Physical Disabilities</li> </ul>
	<b>Geographic Areas Affected</b>	<p>Citywide</p> <p>Englewood NRSA</p> <p>Old South End NRSA</p> <p>Junction Choice Neighborhood NRSA</p> <p>Vistula Neighborhood</p>
	<b>Associated Goals</b>	Housing Improvements
	<b>Description</b>	<p>There is a substantial need for home improvements throughout the city of Toledo. Toledo's housing stock is significantly aged, with 83% of units built before 1980. With significant population decline over the past 5 decades, there is widespread vacancy, dilapidation, and blight throughout large parts of the city, although it is most severe in the neighborhoods surrounding the downtown area, especially in the NRSA geographic areas. There are households throughout the city in need of rehabilitation, including new roofs, siding, porches, foundations, heating and electrical systems, and lead hazard mitigation.</p> <p>The city has also seen a significant increase in its senior population over the past several years, and there is a significant population of all ages that are living with various types of disabilities. There is a need to make in-home modifications to assist residents with mobility challenges to ensure they can live in their homes longer. These modifications may include handrails, ramps, wider doorways, wheel-in showers, grab-bars, and other related accessibility improvements.</p>
	<b>Basis for Relative Priority</b>	With the age of the housing stock, there is a significant need for home improvements as well as demolition and blight clearance. Further, there is a significant need to make home modifications to provide accessible units for the city's growing senior population and for individuals with disabilities. Consultation with community organizations, service providers, neighborhood associations, and online survey results all demonstrate that home improvements and modification is a high priority for the city.
4	<b>Priority Need Name</b>	Slum and Blight Clearance
	<b>Priority Level</b>	High

	<b>Population</b>	Income Level <ul style="list-style-type: none"> <li>Extremely Low</li> <li>Low</li> <li>Moderate</li> </ul> Non-Housing Community Development
	<b>Geographic Areas Affected</b>	Citywide Englewood NRSA Old South End NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood
	<b>Associated Goals</b>	Slum and Blight Clearance
	<b>Description</b>	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.
	<b>Basis for Relative Priority</b>	Through data research and analysis, consultation, community meetings, and online survey results have shown strong support for the need to ensure pests and rodents are controlled in areas of the city with substantial vacancy, as well as the need for demolition of vacant, abandoned, dilapidated, or damaged homes.
5	<b>Priority Need Name</b>	Fair Housing Planning & Services
	<b>Priority Level</b>	Low
	<b>Population</b>	Income Level: <ul style="list-style-type: none"> <li>Extremely Low</li> <li>Low</li> <li>Moderate</li> </ul> Family Types: <ul style="list-style-type: none"> <li>Large Families</li> <li>Families with Children</li> <li>Elderly</li> </ul> Homeless: <ul style="list-style-type: none"> <li>Chronic Homeless</li> <li>Individuals</li> <li>Families with Children</li> <li>Veterans</li> <li>Victims of Domestic Violence</li> </ul> Non-Homeless Special Needs: <ul style="list-style-type: none"> <li>Elderly</li> <li>Frail Elderly</li> <li>Persons with Mental Disabilities</li> <li>Persons with Physical Disabilities</li> <li>Persons with Developmental Disabilities</li> <li>Persons with Alcohol or Other Addictions</li> <li>Persons with HIV/AIDS and their Families</li> <li>Victims of Domestic Violence</li> </ul>
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Fair Housing Planning & Services

	<b>Description</b>	Fair housing practices ensure that safe, adequate and affordable housing is available to all individuals without discrimination.
	<b>Basis for Relative Priority</b>	Although not listed as a high priority, funding must be provided for this activity to ensure fair housing compliance. Monitoring and enforcement of fair housing laws and regulations is an ongoing need in the Toledo community. Residents need to have the option of selecting housing of their choice without any obstacles. Education is a very important component for residents and property owners/managers.
<b>6</b>	<b>Priority Need Name</b>	Public Services
	<b>Priority Level</b>	High
	<b>Population</b>	<p>Income Level:</p> <ul style="list-style-type: none"> <li>Extremely Low</li> <li>Low</li> <li>Moderate</li> </ul> <p>Family Types:</p> <ul style="list-style-type: none"> <li>Large Families</li> <li>Families with Children</li> <li>Elderly</li> <li>Public Housing Residents</li> </ul> <p>Homeless:</p> <ul style="list-style-type: none"> <li>Chronic Homeless</li> <li>Individuals</li> <li>Families with Children</li> <li>Chronic Substance Abuse</li> <li>Veterans</li> </ul> <p>Non-Homeless Special Needs:</p> <ul style="list-style-type: none"> <li>Elderly</li> <li>Frail Elderly</li> <li>Victims of Domestic Violence</li> <li>Limited English Proficiency</li> </ul>
	<b>Geographic Areas Affected</b>	<p>Citywide</p> <p>Englewood NRSA</p> <p>Old South End NRSA</p> <p>Junction Choice Neighborhood NRSA</p> <p>Vistula Neighborhood</p>
	<b>Associated Goals</b>	Public Services
	<b>Description</b>	<p>Toledo has a strong, capable network of providers serving the city's low- and moderate-income population and those who are homeless or at risk of homelessness. The city aims to provide comprehensive community services to meet the basic subsistence, health and wellness, recreational, artistic, cultural, and developmental needs of individuals and families to improve and enrich their lives, move them out of economically vulnerable situations, and promote self-sufficiency. The public services offered by the network of provider organizations supports the basic needs of low- and moderate-income Toledo residents and the special needs populations. The spectrum of services that are needed in the City is broad and includes emergency basic needs for those in crisis, services for individuals suffering from drug or alcohol addiction or mental health or behavioral health issues, childcare and senior care, youth services, victims of domestic violence, persons with disabilities, homeless individuals and families, and other populations.</p>

	<b>Basis for Relative Priority</b>	Comments from citizen participation community meetings and focus groups, consultation with community-based organizations, neighborhood associations, and public services agencies, and online survey results are the basis for relative priority and for the selection of specific public services. The funding for public services is maximized with every annual allocation. Public service agencies occasionally have a waitlist for services, and several have seen a considerable increase in the demand for their services over the past several years. Although the demand for these services is increasing, providers are challenged by decreasing state, federal and local funding. The investment of CDBG resources plays an important role in leveraging additional funding sources to maximize the number of beneficiaries served by each program.
7	<b>Priority Need Name</b>	Services for the Homeless
	<b>Priority Level</b>	High
	<b>Population</b>	<p>Income Level:</p> <ul style="list-style-type: none"> <li>Extremely Low</li> <li>Low</li> <li>Moderate</li> </ul> <p>Family Types:</p> <ul style="list-style-type: none"> <li>Large Families</li> <li>Families with Children</li> <li>Elderly</li> <li>Public Housing Residents</li> </ul> <p>Homeless:</p> <ul style="list-style-type: none"> <li>Chronic Homeless</li> <li>Individuals</li> <li>Families with Children</li> <li>Chronic Substance Abuse</li> <li>Veterans</li> </ul> <p>Non-Homeless Special Needs:</p> <ul style="list-style-type: none"> <li>Elderly</li> <li>Frail Elderly</li> <li>Persons with Mental Disabilities</li> <li>Persons with Physical Disabilities</li> <li>Persons with Developmental Disabilities</li> <li>Persons with Alcohol or Other Addictions</li> <li>Persons with HIV/AIDS and their Families</li> <li>Victims of Domestic Violence</li> </ul>
	<b>Geographic Areas Affected</b>	<p>Citywide</p> <p>Englewood NRSA</p> <p>Old South End NRSA</p> <p>Junction Choice Neighborhood NRSA</p> <p>Vistula Neighborhood</p>
	<b>Associated Goals</b>	Services for the Homeless



	<b>Description</b>	Provide resources to support the efforts of the Continuum of Care as it seeks to respond to the growth of homelessness in the city, support the network of providers that are providing shelter, transitional housing, and services for individuals who are homeless and those at risk of homelessness. Funds will be used to address the shelter, housing and service needs of the homeless, and those threatened with homelessness with an emphasis on ending chronic homelessness, including veteran's and family homelessness, as well as preventing future homelessness.
	<b>Basis for Relative Priority</b>	The city and the region have seen a dramatic growth in the homeless population since the onset of the COVID-19 pandemic. Home values and rental costs have greatly increased in the city, which is exacerbating the housing cost burden of households. Unsustainable rent increases have led to more individuals falling into homelessness including the city's senior population, households working multiple low-wage jobs, and single mothers. Toledo has seen a 30% overall increase in homelessness from 2020 to 2024.
8	<b>Priority Need Name</b>	Infrastructure & Public Facility Improvements
	<b>Priority Level</b>	High
	<b>Population</b>	Income Level <ul style="list-style-type: none"> <li>Extremely Low</li> <li>Low</li> <li>Moderate</li> <li>Middle</li> </ul> Non-Housing Community Development
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Infrastructure & Public Facility Improvements
	<b>Description</b>	City investments in maintaining well-used and aging infrastructure are necessary to improve the living environment of Toledo residents. Repairs to streets, roads, sidewalks, bridges, sewers, stormwater systems, parks and playgrounds are essential for high quality city services and are important for improved quality of life issues for Toledo residents. Further, municipal services, public libraries, senior centers, and public service agencies help meet the educational, recreational, health, and nutritional needs of Toledo youth, families and seniors. The physical condition of some of the structures which house community organizations and social service agencies need upgrades or modernization to better serve Toledo residents. Additionally, there is a desire to make public buildings more accessible to individuals with disabilities.
	<b>Basis for Relative Priority</b>	The city's land-use plan, hazard mitigation plan, online survey results, and consultations with city staff rank infrastructure and public facility improvements as a critical community development need in the city. Conversations with business owners and the Economic Development Directors also ranked infrastructure improvements as a critical need. Repair of aging facilities and infrastructure are highly prioritized by residents. There is also a need for accessibility improvements for persons with disabilities and to make improvements to support pedestrians, cyclists, and public transit riders.
9	<b>Priority Need Name</b>	Economic Development
	<b>Priority Level</b>	High

<b>Population</b>	Income Level <ul style="list-style-type: none"> <li>Extremely Low</li> <li>Low</li> <li>Moderate</li> </ul> Non-Housing Community Development
<b>Geographic Areas Affected</b>	Citywide
<b>Associated Goals</b>	Economic Development
<b>Description</b>	The City is committed to ensuring that Toledo residents benefit from expanded economic opportunities and works to increase the local economy's capacity to generate income and wealth for residents, particularly for low- and moderate-income individuals and families. There is a need to support the city's small business community and to assist with larger export-oriented business site to support existing businesses and attract new businesses to the city and provide employment opportunities to city residents.
<b>Basis for Relative Priority</b>	The city wants to create a desirable place to do business and provide resources and support to ensure that local existing businesses and new businesses can flourish in the city. Through the information gathered from the Economic Development Director, through consultation with other businesses, and through the community meetings and online survey, economic development and job creation were identified as a priority need.

## Narrative (Optional)

During the development of the 2025-2029 Consolidated Plan, CEW Advisors, Inc., on behalf of the City of Toledo, facilitated several community meetings and focus groups, conducted one-on-one consultation interviews, and solicited input from the community, stakeholder organizations, and community groups to identify priority needs. The Priority Needs for Toledo's 2025-2029 Consolidated Plan are based on the preceding Needs Assessment and Market Analysis, as well as information gleaned from the city's planning and land-use documents, the city's hazard mitigation plan, the city's economic development strategy, the city's NRSA Plans, the Housing and Community Development Survey, public input, and stakeholder input. This input served as the foundation for the development of the Consolidated Plan and guided the priority need and goals of the Strategic Plan. These priority needs are integrated into the Goals of this Consolidated Plan and will be addressed systematically through a series of projects and actions over the next five years.

The City of Toledo defines "high priority need" to include activities, projects, and programs that will be funded with federal funds, either alone or in combination with other public or private investments, to address the described needs during the Strategic Plan program years. Regarding "low priority needs," these are activities, projects, or programs that may be funded with federal funds, either alone or in combination with other public or private investments, if additional federal funding becomes available during the strategic plan program years.

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

Table 10 – Influence of Market Conditions	
Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Not applicable. The City of Toledo does not use funds for TBRA.
TBRA for Non-Homeless Special Needs	Not applicable. The City of Toledo does not use funds for TBRA.
New Unit Production	Comparing the total number of households to the total number of housing units, Toledo currently has an oversupply of housing units to serve its residents. However, there remains a mismatch between housing that is affordable to households at different income levels and demand for housing at those levels. Further, the existing housing stock is often of lower quality, especially considering the overabundance of vacant property in the city. The rehabilitation needs for many properties often requires significant investment making rehabilitation nonviable due to the redevelopment cost surpassing the after-rehab assessed value on the property. To address the need to improve its housing stock, the City of Toledo is urging local organizations to submit applications to become certified as Community-Based Development Organizations in the city. This will allow the city to utilize additional CDBG funds to supplement its HOME allocation to develop new housing units. Building more affordable housing units in lower income neighborhoods could help reduce the affordability gap many lower-income Toledo households are experiencing. Funding for new unit production would run parallel to existing rehabilitation programs.
Rehabilitation	The age and physical condition of the city's housing stock are the primary influencing factors for unit rehabilitation. Much of Toledo's housing stock was built before 1980. Due to their age, many of these homes are likely in need of some level of repair. Additionally, the city has lost approximately 1/3 of its total population over the last 55 years, resulting in large numbers of vacant and abandoned properties. A consequence of this significant population loss is that new unit construction is minimal, rehabilitation and renovation of structures has become more prevalent, especially as a large number of properties sit vacant for many years. Through improvements to existing units and investments in neighborhoods, communities can be strengthened and revitalized.
Acquisition, including preservation	In general, the City of Toledo's Department of Housing and Community Development does not engage in acquisition of properties but supports non-profit developers with acquisition. CDBG funds can't be used by a for-profit developer for land acquisition.

## SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

### Introduction

The City of Toledo receives three annual allocations from HUD. These include Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG). The strategic plan establishes the framework for the efficient allocation of these federal resources available to the Department of Housing and Community Development (DHCD) to accomplish the goals and outcomes described in the Strategic Plan over the next five years. The consolidated plan articulates policies, strategies, goals and objectives which are based on an analysis of the city's housing needs, housing market, homelessness, public service, economic development, and community development needs.

While it is challenging to predict future Federal resources based on Congressional appropriations, the city anticipates receiving approximately **\$46.8 million** in total funding over the 5-year period from July 1, 2025 to June 30, 2030. Funding can fluctuate based on allocation methodologies nationally and based on Congressional funding levels. To project allocations for the next 5 years, funding levels for the previous five years were averaged and used as an estimate for future annual allocations for each of the next 5 years. Based on historical funding levels, it is projected that the City of Toledo will receive the following funding amounts for the 2025-2029 Program Years.

- **CDBG:** \$34,434,897
- **HOME:** \$9,264,206
- **ESG:** \$3,123,982

The city's allocation for PY 2025 include:

- **CDBG:** \$7,046,960.00
- **HOME:** \$1,965,724.17
- **ESG:** \$627,043.00
- **Total:** \$9,639,727.17

An additional \$728,799 in CDBG Prior Year Resources and \$3,787,820.93 in HOME Prior Year Resources is estimated to be utilized for the 2025 Program Year to address priority needs and goals, resulting in a total 5-year budget of \$14,156,347.10. The 2025-2026 program year for the City of Toledo starts on 7/1/2025 and ends on 6/30/2026. It is the first Annual Action Plan related to the goals outlined in the City's 2025-2029 Consolidated Plan.

## Anticipated Resources

Table 11 - Anticipated Resources								
Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				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	\$7,046,960		\$728,799	\$7,775,759	\$27,387,937	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 1				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	\$1,965,724.17		\$3,787,820.93	\$5,753,545.10	\$7,298,482	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 1				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	\$627,043			\$627,043	\$2,496,939	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.

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

CDBG funding is the primary funding source for many of the goals outlined in the Consolidated Plan. HOME and ESG funding also contribute significantly to achieving affordable housing and homeless prevention goals respectively. By combining these federal funds from HUD with other local, state, and federal resources (when applicable), the city is better positioned to address the many needs facing the community. These combined resources, as well as efficiencies created through strategic partnerships with other organizations, give the city an increased capacity to address the needs identified in this Consolidated Plan. In combining HUD funds with other resources when they are available, the city can expand the availability of the many benefits these programs provide. These combined resources are used in efforts to increase homeownership rates for LMI residents, address the crisis of homelessness, create a more suitable living environment, provide decent, safe, and sanitary housing, address blight and decay, and many other beneficial activities.

HOME and ESG funds both have mandated matching requirements. While CDBG funds do not require a match, as a policy of the DHCD, all third-party partners that receive CDBG funds must provide a 1:1 match for each dollar received. This is the same 1:1 match that is mandated by HUD for ESG funds. Applicants for CDBG and ESG funding must identify and document the match in their funding applications. The matching requirement for HOME funds is set by HUD based on criteria related to severe fiscal distress. As stated in CFR 92.218, contributions counted as match must be at least 25% of funds drawn from the HOME program. The city's matching requirement is supported through additional funding utilized by affordable housing developers, which can include developer equity, state financing, and other debt or other financing.

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

To carry out housing, economic and community development activities, CDBG and HOME funded programs may obtain publicly owned land or property through the Lucas County Land Reutilization Corporation (Land Bank). The Land Bank acquires vacant and abandoned foreclosed properties and converts them to productive use. The Land Bank assists eligible residents in purchasing and renovating properties, and partners with community members in utilizing vacant lots from demolitions for re-use by residents, community groups, neighborhood associations, and affordable housing developers. Vacant lots are also sometimes offered to neighboring homeowners to increase lot sizes rather than slated for new construction depending on the neighborhood, density, housing demand, and other factors. The City of Toledo supports the demolition and clearance of vacant, abandoned, and blighted property by allocating funding annually through its Urban Beautification program. The City has torn down almost 1,000 properties from January 2020 until early April 2025 and is scheduled to demolish another 500 properties 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 has a history of funding and participating in multiple community planning efforts with a variety of stakeholders to truly understand the regional and neighborhood concerns of residents. These sessions have led to the development of several community plans with clear vision, goals, objectives, and proposed activities along with possible sources of financing. The City has been investing in these neighborhoods and sees an opportunity to continue to leverage its CDBG, HOME, and ESG funds with other City capital expenditures and private sector financing for targeted neighborhood improvements that directly respond to the needs of the city's residents.

The Consolidated Plan process was used to encourage further collaboration and joint investment of dollars to have the most significant impact. One of the proposed strategies is to use the CDBG Neighborhood Revitalization Strategy Areas to focus federal dollars and align them with other investments. The City is also reviewing its service delivery system to ensure it is both efficient and effective. The use of external organizations including community-based nonprofits to deliver some services instead of internal departments was also discussed and may be an opportunity to invest in more efficient and knowledgeable service delivery by on-the-ground agencies rooted in the lived experiences of the communities they serve. The organizational capacity of subrecipients, greater collaboration and coordination of services, and helping agencies access other sources of funding was also highlighted as critical components of collective impact.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Table 12 - Institutional Delivery Structure			
Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Toledo - Department of Housing and Community Development	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
City of Toledo - Department of Law	Government	Non-homeless special needs Ownership Rental neighborhood improvements	Jurisdiction
City of Toledo - Plan Commission	Government	Non-homeless special needs Planning neighborhood improvements	Jurisdiction
Toledo Lucas County Homelessness Board	Continuum of care	Homelessness Planning	Region
Lucas Metropolitan Housing (LMH)	PHA	Public Housing Rental	Region

<b>Responsible Entity</b>	<b>Responsible Entity Type</b>	<b>Role</b>	<b>Geographic Area Served</b>
Lucas County	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Region
Mental Health and Recovery Services Board	Government	Non-homeless special needs Planning public services	Region
United Way of Greater Toledo	Non-profit organizations	Homelessness Non-homeless special needs public services	Region
Lucas County Board of Developmental Disabilities	Government	Non-homeless special needs public services	Other
OhioMeansJobs - Lucas County	Government	Economic Development Non-homeless special needs	Other
Lucas County Land Reutilization Corporation	Public institution	Non-homeless special needs neighborhood improvements	Other
Toledo-Lucas County Health Department	Government	Non-homeless special needs public services	Region
NeighborWorks Toledo Region	Non-profit organizations	Ownership Rental	Jurisdiction

<b>Responsible Entity</b>	<b>Responsible Entity Type</b>	<b>Role</b>	<b>Geographic Area Served</b>
Local Initiatives Support Corporation Toledo	Non-profit organizations	Economic Development Non-homeless special needs Ownership Rental neighborhood improvements public services	Jurisdiction
Preferred Properties, Inc.	Non-profit organizations	Rental	Jurisdiction
Toledo Area Regional Transit Authority (TARTA)	Government	Non-homeless special needs Planning public services	Region
Toledo Lucas County Port Authority	Other	Economic Development Non-homeless special needs	Region
Neighborhood Properties, Inc.	Non-profit organizations	Homelessness Non-homeless special needs Rental public services	Other
Toledo Fair Housing Center	Non-profit organizations	Homelessness Ownership Planning Public Housing Rental	Region
Lucas County Department of Job and Family Services	Government	Non-homeless special needs public services	Other
Equitas Health	Non-profit organizations	Homelessness Non-homeless special needs public services	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Toledo Department of Economic Development	Government	Economic Development Non-homeless special needs	Jurisdiction

## Assess of Strengths and Gaps in the Institutional Delivery System

The City of Toledo's Five-Year Consolidated Plan process involved an interjurisdictional effort bringing together numerous entities through mutual participation, contribution, and various forms of input to identify delivery gaps and the steps necessary to address and close those gaps. To address the needs of the community, the DHCD coordinates with nonprofit service providers, housing agencies, private sector participants, and public sector agencies. For efforts that directly relate to housing, the DHCD works closely with Lucas Metropolitan Housing (LMH), the Homebuilders Association of Greater Toledo, CHDOs, Toledo Lucas County Homelessness Board, Lucas County Land Bank and other regional partners to undertake and promote stable housing activities.

In Toledo, the Year 16 Initiative (YR16) was a collaborative partnership that included the DHCD, Ohio Capital Corporation for Housing, Ohio Housing Finance Agency, National Equity Fund, local lending institutions, Local Initiatives Support Corporation (LISC), Lucas County Land Bank, Lucas Metropolitan Housing, Wallick Communities, United North, NeighborWorks, technical assistance providers, CHN Housing Partners and Neighborhood Progress, Inc. (NPI). This initiative created a catalyzing partnership that provided homeownership opportunities to renter occupants once the 15-year compliance period expired for Low-Income Housing Tax Credit projects. Building on these strategies and the relationships cultivated through this effort, this Toledo partnership has established relationships that strengthen the Institutional Delivery System.

The Continuum of Care (CoC) local planning process supports the Toledo area homeless prevention, emergency shelter, transitional housing, permanent supportive housing and supportive service needs. The City of Toledo continues to remain an active partner within the CoC and maintains a productive relationship with the Toledo Lucas County Homelessness Board (TLCHB), the lead agency in the CoC. The City allocated ESG funding in partnership with the CoC to maximize the effectiveness of strategies to prevent homelessness and assist those that have fallen into homelessness.

The City of Toledo Department of Economic Development (DED) continues to promote strategies that directly lead to job creation, job retention and business development. The DED offers a variety of loans options, incentives, and tax credit programs to help local businesses get needed resources for business development and expansion, including:

## **Real Estate Incentives**

**Facade Improvement Grant Program:** The Facade Improvement Grant program helps property owners transform the facade of commercial, industrial, and mixed-use buildings by providing a 50% matching grant to reimburse expenses incurred during a comprehensive facade improvement.

**White Box Grant Program:** The White Box Grant program helps property owners bring vacant commercial first-floor spaces up to current code to create a functional "white box" space ready for customization and occupancy by a business.

**Commercial and Industrial Tax Abatement Program:** This program provides real property tax abatement for the construction or rehabilitation of commercial or industrial structures within Toledo. The City of Toledo's CITA program works to promote economic activity and job growth that would not have otherwise occurred

**Residential Tax Abatement Program:** This program provides real property tax abatement for the construction or rehabilitation of residential structures within Toledo. The City of Toledo's CRA program works to promote housing development and rejuvenate existing housing stock within city limits.

**Brownfield Assessment Grant:** The Brownfield Assessment Grant provides funding to proactively conduct environmental assessments and remedial planning activities for brownfield sites. The program provides funding up to 100% of the eligible expenses, up to a maximum of \$50,000 per project.

**Brownfield Revolving Loan Fund:** The Brownfield Revolving Loan Fund provides low-interest long-term financing and grant funding for the cleanup and subsequent redevelopment of brownfield properties. A "brownfield" is defined as an abandoned, idled, or under-used industrial, commercial, or institutional property where expansion or redevelopment is complicated by known or potential releases of hazardous substances or petroleum.

## **Business Financing**

**Enterprise Development Loan Program:** This program is intended to encourage private lenders to provide credit to firms which have difficulty securing reasonable financing that promotes growth, while preserving working capital. In addition, the EDL Program is intended to directly serve the needs of disadvantaged business enterprises that quite often lack the resources to obtain credit through conventional means. The EDL Program's primary goal is to secure the retention and creation of jobs for low and moderate income residents of the City of Toledo by providing subordinated, long-term financing at attractive rates.

## **Payroll Incentives**

**Toledo Expansion Incentive Program:** The Toledo Expansion Incentive program provides a monetary, performance-based grant to attract and retain businesses in the City of Toledo. The grant is based on the actual growth in annual municipal income tax that is generated from eligible new employees and payroll associated with the company's project.

**Municipal Jobs Creation Tax Credit Program:** The Municipal Jobs Creation Tax Credit program provides a monetary, performance-based grant to attract and retain businesses in the City of Toledo. The grant is based on the actual growth in annual municipal income tax that is generated from eligible new employees and payroll associated with the company's project.

### **Additional Incentives**

**Legacy Corridor Business Resilience Grant:** The Legacy Corridor Business Resilience Grant is a pilot program designed to assist eligible businesses located directly on Legacy Commercial Corridors that are being improved by a City road reconstruction project. The program offers a grant of \$5,000 for eligible operating expenses. For multi-year road reconstruction projects, additional awards may be available, subject to annual appropriations by Toledo City Council.

**Section 108 Loan:** The Section 108 Loan program is administered by the Dept. of Housing and Community Development. It provides flexible, low-interest long-term financing for a variety of business needs and uses. Loan terms up to 20 years at lower interest rates than those offered through conventional financing. Developer deals or income producing properties are also eligible. Minimum loan of \$300,000.

**Toledo Business Growth Fund:** Administered by the Women of Toledo, low-interest small business loans are offered to local businesses to support their growth and to invest in neighborhood development. The funds target businesses in downtown Toledo and in revitalization areas of Toledo.

As with many delivery systems, ongoing communication among the people involved with the various components is critical. Through the consultation process, several agencies spoke to the need for better coordination and collaboration among the various agencies and providers who spoke of duplicative activities in the city. Further, focus group discusses highlighted potential opportunities of organizing larger neighborhood-based collective impact models of programming. The city is supportive of these efforts and may pilot a funding model that is rooted on the collective efforts of a network of locally based community organizations working together to maximize the impact of the investment in a neighborhood.

### **Availability of services targeted to homeless persons and persons with HIV and mainstream services**

**Table 13 - Homeless Prevention Services Summary**

<b>Homelessness Prevention Services</b>	<b>Available in the Community</b>	<b>Targeted to Homeless</b>	<b>Targeted to People with HIV</b>
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics	X		
Other Street Outreach Services	X		
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
<b>Other</b>			
Other			

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The Toledo Lucas County Continuum of Care (CoC) collaborates with local agencies to provide housing and other wrap around services to customers. The Toledo Lucas County Homelessness Board (TLCHB) serves as the lead agency and governs the Toledo Lucas County CoC. Local collaborations include organizations such as: Toledo DHCD, Lucas County Commissioners, Neighborhood Properties, Inc., Mental Health and Recovery Services Board, Lucas Metropolitan Housing, local shelters, transitional housing, hospitals, schools, mental health providers, law enforcement, Criminal Justice Coordinating Council, and any other service provider that may touch a customer in the process of providing services.

The Mental Health and Recovery Services Board of Lucas County and local mental health agencies (A Renewed Mind, Harbor Behavioral Health, Unison Health, and the Zepf Center) are also involved in the CoC planning processes to ensure clients are provided with the most appropriate and



continuous delivery of services possible. The CoC collaborates with Lucas County Job and Family Services to design outreach and assistance plans for eligible clients. The CoC also collaborates with Ohio Means Jobs (the one-stop employment and training local agency) and various medical systems to coordinate processes or address gaps in client services.

The City of Toledo works with the following homeless service providers to address and eliminate homelessness:

- Cherry Street Mission is the largest provider of housing and services for the homeless in the city. They provide essential services like emergency shelter, meals, and clothing to those in need, workforce development programs that offer professional training in areas like construction, auto repair, project management, and Artificial Intelligence, and transitional housing (Caleb House).
- The Aurora Project, Inc. provides stable, safe, and service-enriched transitional housing to homeless women and their children to enable them to ultimately obtain and maintain permanent housing.
- Beach House, Inc. provides emergency shelter, rapid re-housing, and case management services to homeless women and families.
- Family House provides emergency shelter and re-housing assistance to homeless families.
- St. Paul's Community Center provides emergency shelter, case management services, and nutritious lunches to homeless individuals.
- United Way of Greater Toledo provides diversion services, homelessness prevention, and housing crisis response for households experiencing homelessness.

While not funded directly by the City of Toledo, two additional agencies provide important services and housing to the city's homeless population.

- Catholic Charities (La Posada) provides emergency shelter and supportive services to homeless persons and assist them in obtaining transitional or permanent housing.
- The Zepf Center provides transitional housing that is recovery-focused provides a foundation of stability and security for individuals in early sobriety.

Although the City of Toledo does not receive HOPWA funding, Equitas Health (formerly known as the AIDS Resource Center) works with the local population living with HIV/AIDS on issues related to obtaining/maintaining housing and avoiding homelessness. Equitas Health is committed to providing access to the essential care and services that people living with HIV/AIDS need to live stable and healthy lives, which inherently include providing access to housing.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

Meeting homelessness challenges in the City of Toledo is a collaborative effort comprising of numerous agencies, organizations, and providers. The City of Toledo uses its CDBG, ESG and HOME funds to effectively support housing and community development activities and has been able to effectively deploy time-limited funding sources from programs such as the Neighborhood Stabilization Program (NSP). In addition, the City partners with the County and regional agencies to provide housing and homeless services for special needs populations. However, the financial resources available to the City for housing and community development are insufficient to meet the significant and growing needs. Most notably, the City does not receive HOPWA funding and many housing and community development services are not targeted to persons living with HIV/AIDS. While critically important, services for persons living with HIV/AIDS were not identified as a priority need during the citizen participation process. This likely has more to do with the invisibilizing of the population living with HIV/AIDS and the diminishment of this as a salient issue among the larger population than with the actual needs of this population.

In terms of special needs populations, the primary obstacle to fully addressing the needs outlined in the Consolidated Plan is the availability of funding. Federal and state budget changes and shortfalls for social service programs may jeopardize the model that combines affordable housing with needed social services. The City of Toledo will continue to seek partnerships, coordination or collaboration, and funds that contribute to stability and growth for residents of the City of Toledo.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Although the City of Toledo coordinates with homeless and public service providers, there is always room for improved communication and cooperation between and among agencies and with the public and private sectors. To help meet the needs of its residents who are experiencing homelessness, the City will continue to collaborate with the CoC and its local agencies. The primary gap in the delivery of services is the lack of adequate financial resources to best serve the City's needs. The scope of services needed for low and moderate-income households, particularly those with special needs, often exceeds any combination of available resources. The City's commitment to participate in regional efforts to address priority needs will assist in bridging the funding and service gaps.

Community development activities build stronger and more resilient communities through an ongoing process of identifying and addressing needs, assets, and priority investments. Community development activities may support housing and public services, but also economic development projects, microenterprise assistance, and other areas of job and business development.

# SP-45 Goals Summary – 91.215(a)(4)

## Goals Summary Information

Table 14 – Goals Summary								
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	Affordable Housing	CDBG: \$1,250,000  HOME: \$8,226,027.10	Homeowner Housing Added: 20 Household Housing Units  Rental Units Constructed: 60 Household Housing Units
2	Homeownership Opportunities	2025	2029	Affordable Housing	Citywide	Homeownership Opportunities	HOME: \$800,000	Direct Financial Assistance to Homebuyers: 225 Households Assisted
3	Housing Improvements	2025	2029	Affordable Housing	Citywide	Housing Rehabilitation and Home Modifications	CDBG: \$12,213,983  HOME: \$3,100,000	Homeowner Housing Rehabilitated: 400 Household Housing Units
4	Slum and Blight Clearance	2025	2029	Affordable Housing	Citywide	Housing Rehabilitation and Home Modifications	CDBG: \$347,500	Housing Code Enforcement / Foreclosed Property Care: 1,000 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		Fair Housing Planning & Services	CDBG: \$800,000	Public service activities for Low/Moderate Income Housing Benefit: 2,250 Households Assisted
6	Public Services	2025	2029	Non-Homeless Special Needs	Citywide	Public Services	CDBG: \$5,165,234	Public service activities other than Low/Moderate Income Housing Benefit: 45,000 Persons Assisted
7	Homelessness Services	2025	2029	Homeless	Citywide	Homelessness Services	ESG: \$3,123,982	Homeless Person Overnight Shelter: 4,500 Persons Assisted  Tenant-based rental assistance / Rapid Rehousing: 120 Households Assisted
8	Infrastructure & Public Facility Improvements	2025	2029	Non-Housing Community Development	Citywide	Infrastructure & Public Facility Improvements	CDBG: \$7,750,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 70,000 Persons Assisted
9	Economic Development	2025	2029	Non-Housing Community Development	Citywide	Economic Development	CDBG: \$750,000	Businesses Assisted: 225 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				CDBG; \$6,886,979  HOME: \$926,000	Other: 11

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing Development
	<b>Goal Description</b>	Funds will be used to assist in the creation or preservation of affordable housing units for rental and homeownership.
2	<b>Goal Name</b>	Homeownership Opportunities
	<b>Goal Description</b>	Funds will be used to support low- and moderate-income residents in accessing homeownership through the Home at Last downpayment assistance program.
3	<b>Goal Name</b>	Housing Improvements
	<b>Goal Description</b>	Funds will be used to support low- and moderate-income residents in the rehabilitation 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	<b>Goal Name</b>	Slum and Bight Clearance
	<b>Goal Description</b>	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	<b>Goal Name</b>	Fair Housing Planning & Services
	<b>Goal Description</b>	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	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	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	<b>Goal Name</b>	Homelessness Services
	<b>Goal Description</b>	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	<b>Goal Name</b>	Infrastructure & Public Facility Improvements
	<b>Goal Description</b>	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	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	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	<b>Goal Name</b>	Planning and Administration
	<b>Goal Description</b>	Funds will be used to ensure the proper administration and management of the CDBG, HOME, and ESG programs.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

Affordable housing will be provided through new construction, rehabilitation of owner occupied or rental units and down payment assistance. It is estimated that over the 5-year period of this Consolidated Plan, the estimated number of extremely low income (ELI), low income (LI) and moderate-income (MI) families to be provided with affordable housing includes the following:

- Affordable Housing Development:
  - 8 Total: 2 ELI, 2 LI, and 4 MI homeowner households
  - 60 Total: 40 ELI, 10 LI, and 10 MI renter households
- Homeownership Opportunities
  - 225 Total: 50 ELI, 100 LI, and 75 MI households will receive downpayment assistance
- Housing Improvements
  - 1,000 Total: 300 ELI, 500 LI, and 200 MI homeowner households

# **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

## **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

Not applicable. The Toledo Housing Authority is not subject to a Section 504 Voluntary Agreement.

## **Activities to Increase Resident Involvements**

The City of Toledo works in collaboration with LMH to encourage public housing residents to become actively involved in resident management and increase participation in homeownership through the following strategies:

- Collaboration with the Housing Choice Voucher Program on developing homeownership strategies for the Family Self-Sufficiency (FSS) Program population.
- Mobilizing the Program Coordinating Council (PCC) community partners towards streamlined and simplified access for residents in the FSS program.
- Assessing and refining marketing strategies for FSS participants to highlight homeownership opportunities.
- The Financial Opportunity Center (FOC) helps residents boost earnings, reduce expenses, and increase savings simultaneously by providing employment assistance, financial education & coaching, and access to income supports through long term one-on-one site-based coaching and community collaborations.
- Continued training and development of the Central Resident Advisory Board to solidify structure and objectives.
- Assisting the Central Resident Advisory Board with developing techniques for the improved collection of input from residents.
- Various other activities offered by LMH focused on improving the lives and living conditions for public housing residents, such as Light the Night and the Fatherhood Initiative.
- Resident Councils at all multi-family sites
- Participation in the Resident Opportunity Program
- Section 3 Program job training, employment, and contract opportunities
- Participation in the FSS Program, enabling families to increase their income and reduce their dependency on public assistance.
- Resident Computer labs at select LMH properties

## **Is the public housing agency designated as troubled under 24 CFR part 902?**

No.

## **Plan to remove the ‘troubled’ designation**

Not applicable.



# **SP-55 Barriers to Affordable Housing – 91.215(h)**

## **Barriers to Affordable Housing**

Several documents were reviewed and supplemented with consultation with municipal staff, affordable housing developers, and the Toledo Fair Housing Center to identify the barriers to affordable housing. These documents included:

- 2025-2029 Analysis of Impediments to Fair Housing Choice
- Forward Toledo Comprehensive Land Use Plan
- Toledo Together 10-Year Action Plan for Housing

The following barriers to affordable housing have been identified.

### **Regulatory Barriers**

**Lengthy Permitting and Rezoning:** Toledo’s permitting for multifamily housing takes about 90 days, compared to 60 days for neighboring areas. Complex rezoning and variance approval processes further delay development. Administrative approval of certain variances would speed progress.

**Zoning Misalignment:** Current zoning does not support townhomes or duplexes. Land-use restrictions limit options for missing middle housing and reinforce disinvestment in historically redlined areas. Regulations also restrict housing for people with disabilities and those recovering from substance abuse.

**Code Enforcement Disparities:** Enforcement is stricter on private homeowners than on bank-owned foreclosures. Investor-owned properties often lack maintenance, contributing to neighborhood decline.

### **Financial Barriers**

**Local Funding Gaps:** Lack of local funding prevents leveraging state and federal tax credits. High construction costs and limited demand for 4% LIHTCs hinder affordable housing development.

**Difficulty Securing State/Federal Resources:** Toledo struggles to compete for housing tax credits due to low appraisals and limited local support. City Council resistance to projects like Warren Commons hurts funding opportunities.

**Homeownership Challenges:** The city’s down payment assistance program is slow, taking up to 90 days and causing buyers to miss out on homes.

**Discrimination:** Mortgage lenders disproportionately deny loans to Black and low-income applicants and some insurers charge higher premiums or deny coverage in minority neighborhoods.

### **Physical Condition**

**Blight and Disinvestment:** Long-term disinvestment in central neighborhoods has caused widespread blight and increased rehab costs, reducing the stock of livable affordable housing.

Investor Neglect: Out-of-town property owners often allow rental units to deteriorate, prioritizing profits over property upkeep.

### **Housing Accessibility and Affordability Barriers**

Income Discrimination: Landlords frequently reject alternative income sources like Social Security, Veterans Benefits, or Housing Choice Vouchers, reducing options for low-income renters.

Criminal Record Screening: Many landlords exclude applicants based on criminal histories unrelated to tenancy.

Lack of Accessible Housing: The city lacks adequate housing for individuals with disabilities, leaving them in unsuitable conditions.

### **Systemic Issues**

Severe Housing Shortage: Toledo lacks 12,705 rental units affordable to extremely low-income households, with only 35 available units per 100 renters. Nearly a quarter of the city's subsidized housing could be lost by 2031.

Barriers to HCV Use: Landlords commonly reject HCVs. Without local source-of-income protection laws, voucher holders face limited housing options.

### **Recent Solutions and Investments**

In January 2025, Toledo received \$4 million from the federal PRO Housing program to tackle two major barriers: an outdated zoning code and a weak housing market. The funding will support:

1. A comprehensive update of the city's zoning code and development standards;
2. The creation of pre-approved housing design templates to reduce development costs; and
3. Appraisal gap financing to incentivize affordable housing development in weak market areas, especially those identified in the Consolidated Plan's Geographic Target Areas.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

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 outlines a comprehensive set of strategies to remove or mitigate barriers to affordable housing.

In January of 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 will address two significant barriers to affordable housing production and preservation in the City of Toledo: an outdated zoning code; and a weak market for new or preserved housing. Toledo will use this funding to assist in ameliorating affordable housing production in the following ways:

1. Comprehensive update of the Toledo Planning and Zoning Code and development standards;
2. Reducing costs for new affordable housing production by developing and approving housing design templates to be made available to housing developers; and
3. Appraisal gap financing to incentivize housing production in targeted weak market neighborhoods, including the Geographic Target Areas of the Consolidated Plan.

## **SP-60 Homelessness Strategy – 91.215(d)**

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

The Toledo/Lucas County region, through the Toledo Lucas County Homelessness Board (TLCHB), continues to implement several goals and actions to assist in the overall goal of reducing and ending homelessness. Coordinated Entry (CE) data is used to measure the progress towards these goals.

By utilizing specialized case management through the Neighborhood Properties, Inc. (NPI) Projects for Assistance in Transition from Homelessness (PATH) program, the CoC continues to foster outreach relationships among the unsheltered homeless in our community. Through NPI's PATH program, community outreach is being performed to reach individuals who are chronically homeless and/or living with untreated mental health or substance abuse issues. NPI's Community Outreach Specialists are trained to identify and engage homeless individuals in the community and connect them to services as well as possible housing options. The PATH program will continue to assist those clients in need of intensive client-based specialized case management. By successfully connecting clients to the services needed, the community will experience overall cost-savings to the criminal justice system and medical systems, as well as reduce the level of homelessness.

### **Addressing the emergency and transitional housing needs of homeless persons**

Emergency Solutions Grant funds will continue to support local homeless service providers who provide eligible services under current federal regulations. Activities may include emergency shelter operations, coordinated assessment through United Way 2-1-1, direct financial assistance for permanent housing, and administration of the local Homeless Management Information System.

Within our emergency shelters and transitional housing programs, Toledo/Lucas County CoC is taking a system-wide approach to streamline the process of accessing available housing programs to reduce the amount of time a person experiences homelessness. This approach analyzes similarities and best practices in the community to better serve those experiencing homelessness. Reducing the time spent in both emergency shelters and transitional housing programs decreases the overall costs to the homelessness services system and works to more quickly stabilize individuals or households.

These cost savings can then be passed on to more specialized financial needs, such as the removal of housing barriers through direct financial assistance. The community is committed to expanding collaborative efforts at both the agency and system-wide level to reduce gaps in homeless services and reduce homelessness levels overall.

**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 City of Toledo and Toledo Lucas County Homelessness Board will seek to expand the availability of rapid rehousing units for singles and permanent supportive housing units for families. This will shorten the time that individuals and families experience homelessness as well as reduce the number of chronically homeless in our community. Homeless prevention activities begin when individuals call 2-1-1 and state that they are in a housing crisis.

The Coordinated Entry System has been fully implemented and a coordinated assessment tool is used for prioritization and placement of clients in appropriate housing programs. This evidence-based tool is known as the Service Prioritization Decision Assistance Tool (SPDAT). The tool provides the community with a more comprehensive and thorough method by which to assist clients for both shelter placement (use VI SPDAT) and permanent housing referrals/placements (use SPDAT or F-SPDAT). Coordinated Assessment will work with clients to evaluate the safety and appropriateness of their housing options.

Diversion activities by will be critical If homelessness is unavoidable, and Coordinated Assessment connects clients to emergency shelter services. Once at a shelter, residents will be assessed by trained case managers using the Service Prioritization Decision Assistance Tool (SPDAT). This evidence-informed tool is already integrated with the local HMIS system and is continuously reviewed and revised with input from users. This allows homeless service providers to accurately assess individual needs and help them access the programs and services that will assist them in ending their homelessness.

Participants in the re-housing programs are provided access to professional development, financial planning, mental health providers, substance abuse treatment and therapies, educational services, and family support services. Through these programs, families and individuals have access to the tools necessary for long term success, thereby decreasing the likelihood of future episodes of homelessness.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The Toledo Lucas County CoC utilizes various partner agencies in preventing homelessness for community members throughout the Toledo region. When an individual contacts any homeless service provider, they are referred to the local United Way 2-1-1 system. The 2-1-1 staff are trained to identify housing or other urgent needs and refer the call to the appropriate department within the United Way system. For those that identify housing as a need, the caller is referred to the coordinated access (CA) staff for further work on prevention and diversion. Coordinated Entry continues to assist individuals and families from becoming homeless through its prevention and diversion activities. The Coordinated Entry team works to identify and target possible mainstream resources available to keep clients housed. If the staff are unable to find alternatives to entering a state of homelessness, they will refer the client to the most appropriate emergency housing available. The CoC will continue to analyze and quantify data collected by the 2-1-1 system to assess the effectiveness of prevention and diversion efforts.

For individuals being “discharged” from an institution, the CoC works to ensure the institution has plans in effect that require effective pre-discharge planning surrounding housing. However, there are some regulatory issues that may cause the institution to discharge an individual into a state of homelessness. In this rare instance, the individual is connected to the United Way through 2-1-1 for engagement in the rapid re-housing process.

## **SP-65 Lead Based Paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The City is committed to providing lead-safe, decent, safe and sanitary housing for eligible families. The City uses a coordinated network of health officials, the public housing authority, social service agencies, and city departments to reduce lead-based paint hazards. This effort targets central city neighborhoods where low-income families occupy approximately two of every three residential units and the concentration of pre-1978 structures containing lead paint is estimated to exceed 80 percent.

The City of Toledo has been involved in lead clearance work for 30 years when it received its first Lead Hazard Control grant in 1995. The city also leverages funding from the Ohio Department of Development and the Lucas County Regional Health Department EPA settlement funds to conduct lead inspections and risk assessments and perform lead clearances. As of the writing of this Consolidated Plan, the City has four active lead-based paint hazard control grants:

- HUD Office of Lead Hazard Control and Healthy Homes (OHLHD0453-20): Period of Performance end 6/30/2025 with a 120-day close-out period
- HUD Office of Lead Hazard Control and Healthy Homes (OLHH002-21): Period of Performance end 7/28/2025 with a 120-day close-out period
- Ohio Department of Development: Period of Performance end 2/28/2026 with a 30-60-day close-out period (30 days for draws/60 days for reports)
- Lucas County Regional Health Department EPA settlement funds: Period of Performance end 3/25/2027 Close out period TBD

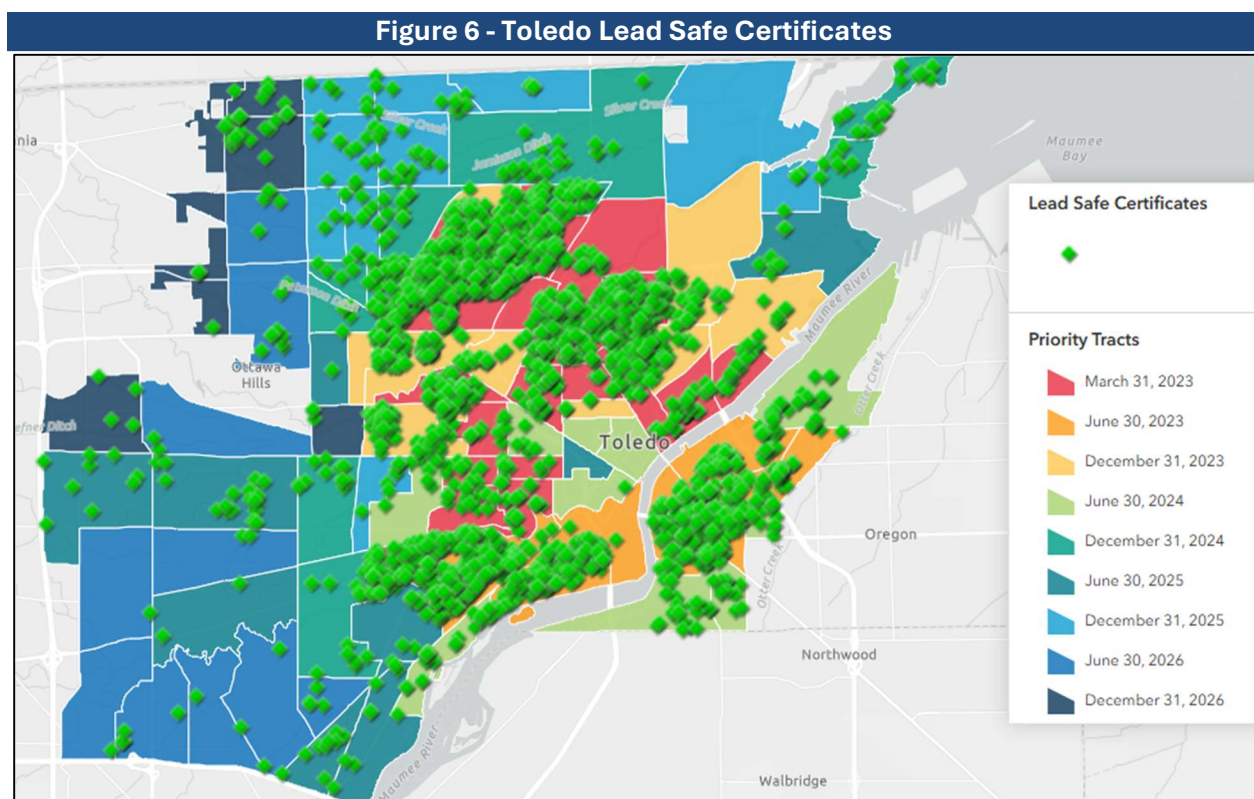
Utilizing these funds, the city performs lead inspections, risk assessments, and performs lead hazard mitigation work. In 2024, the lead program changed its operating model and contracted with a third-party to complete lead inspections and risk assessments which has significantly increased production. Importantly, the number of residential units made lead safe is in direct relation to the number of lead contractors available for the program. The number of qualified, experienced and licensed contractors fluctuates. Since 2020, the program has had 14 contractors participate in the program; however, during that time six contractors were terminated due to performance and quality issues, and one contractor was no longer available. The city's lead program currently has 7 contractors on rotation.

Over the past 4 years (2021-2024), the city has performed an average of 34 lead clearances annually. The average unit cost in 2024 was \$24,291, a 9% increase from the previous year. Project costs have ranged from a low of \$8,832 to a high of \$58,295, depending on the amount of work that needs to be done. The most common rehabilitation needs for the lead grant include windows, doors (interior and exterior) and siding. Lead-based paint hazard control methods include the utilization of low-level interventions, interim controls and partial/component abatement. Abatement is the preferred method in addressing paint surfaces. The program does not perform full



abatement but rather the replacement of specific components and systems. Units are made lead-safe but not lead-free in order to maximize the grant funds.

The DHCD, in coordination with the Lucas County Regional Health Department, developed a local lead-safe registry. The current registry includes rental units that have been issued Lead Safe Certificates in compliance with the City's Lead Safe Ordinance. Specific rental housing units can be looked up via an interactive map to see if they have received a lead clearance certificate.<sup>6</sup> Importantly, owner-occupied units are not part of the database as they are not required to have a Lead Safe Certificate.



Data Source: Lead Safe Toledo

### How are the actions listed above related to the extent of lead poisoning and hazards?

The City of Toledo, DHCD, administers the owner-occupied and rental rehabilitation program as well as a CHDO program. These programs are required to incorporate lead assessments on any unit evaluated by DHCD programs. Properties where lead hazards are discovered are abated using

<sup>6</sup> <https://toledoleadsafe.com/>



State licensed lead abatement contractors, in accordance with federal regulations. State Lead Licensed personnel conduct the assessment. In addition, DHCD continues to include, as part of its HOME-funded homeowner activities, lead rehabilitation to LMI households. The DHCD addresses units that may not be otherwise eligible for Lead Hazard Reduction Grant programs.

As discussed in Section MA-20, the City of Toledo has one of the highest incidence levels of childhood lead poisoning in the state of Ohio due to the significant number of homes built prior to the 1978 lead paint ban that are in need of rehabilitation. The City of Toledo has been involved in lead clearance work for 30 years when it received its first Lead Hazard Control grant in 1995. The city also leverages funding from the Ohio Department of Development and the Lucas County Regional Health Department EPA settlement funds to conduct lead inspections and risk assessments and perform lead clearances. The City of Toledo successfully planned, designed, and implemented four previous Lead Hazard Reduction Programs, successfully managing grants totaling \$9.2 million, resulting in over 1,200 units of lead-safe housing units since 1994. Due to these past and continued efforts, the City has seen decreasing levels of childhood lead poisoning over the past several years.

### **How are the actions listed above integrated into housing policies and procedures?**

All residential homes that receive down-payment assistance through the HOME program are also assessed visually for lead hazards. Homes where lead hazards exist must be made lead-safe prior to finalization of the sale. Efforts addressing lead-based paint hazards are essential, especially when targeting rehabilitation projects in the central city neighborhoods.

The DHCD has a contract with the Lucas County Regional Health District in order to administer and manage their Lead-Based Paint Hazard Control Program (LBPHCP). Acting as a sub-grantee, the DHCD is providing interim control lead abatement and clearance activities to eligible residents.

Funding for the LBPHCP was received from HUD's Office of Healthy Homes and Lead Hazard Control, which provides financial assistance to help reduce lead paint hazards in residential units located in the City of Toledo. Assistance is provided to qualified homeowners and landlords in the form of a grant, with the highest priority given to units occupied by children under the age of six or at least one pregnant female.

# **SP-70 Anti-Poverty Strategy – 91.215(j)**

## **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

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

The DHCD engages in housing development and improvement programs that assist in reducing the number of families living at the poverty level. Housing programs are designed to have a positive effect on individuals and families and the larger community in the following areas:

- stabilization of families (providing or maintaining adequate affordable housing);
- health improvement (elimination of lead and other health hazards such as electrical, ventilation and other issues resulting from an aging housing stock and limited maintenance); and,
- increase in homeownership and wealth building.

Other non-housing programs related to economic development assist in the creation or retention of businesses, enhancing employment opportunities for the city's residents in many industries, including construction, finance, healthcare, entertainment and other industries that indirectly benefit from a more robust business environment. Many of these programs contribute to community growth and make Toledo more attractive to businesses and individual investments; thereby increasing opportunities for improved incomes for Toledo residents.

Through the Citizen Participation Process of the Consolidated Plan, funding recipients, agency staff, and the broader community identified the following programs that are beneficial in reducing the number of Toledo poverty-level families:

- Community gardens and food distribution
- Workforce Training Programs
  - Science, Technology, Engineering and Math Education (STEM)
  - Construction Careers Academy - Teens learn construction trades and skills (through schools)
- Free / Affordable Childcare and School Based Programs
  - Sports and parenting programs
  - Programs at different schools for K-6 graders
- Senior Care – To allow caregivers to work

These programs represent some of the many programs in Toledo that develop life-skills and contribute to the reduction of poverty-level families. The City is a partner with many of these programs and targets resources that, when leveraged, make a significant impact in the reduction of poverty. Additionally, organizations like ProMedica and Mercy Hospital partner with local organizations and agencies to geographically target specific low-income and depressed areas of the City. Wherever possible, the DHCD participates in those partnerships.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

The City continues to promote better collaboration in all efforts and partners with many institutional structures in carrying out activities designed to decrease poverty and improve the quality of life within the city. Each year, through the cooperation of major local entities, efforts are aimed at enhancing the coordination between service and housing agencies and private and public sector agencies, in order to reduce gaps in service. They include, but are not limited to the following:

- Toledo Lucas County Homelessness Board
- Toledo-Lucas County Port Authority
- Lucas County Regional Health District
- United Way of Greater Toledo
- Lucas Metropolitan Housing
- Mental Health and Recovery Services Board of Lucas County
- Lucas County Children Services Board
- Lucas County Land Reutilization Program
- Toledo Public Schools
- Washington Local Schools
- Lucas County Government

Likewise, a partnership with the TLCHB provides direct financial assistance to individuals who are homeless or at imminent risk of homelessness. The partnership also includes the implementation of the Housing Collaborative Network, modeled after CASE-HPRP and provides re-housing and prevention assistance to those experiencing homelessness. The capacity of this project is broadened by leveraging funds from the State and local foundations.

Many relationships exist between the business community, faith-based organizations, public service entities, housing providers, foundations, and other community organizations that advocate on behalf of those in need. Increased communication and involvement with all community stakeholders will continue and result in more formalized relationships that nurture and promote the City's annual plans and goals.

## **SP-80 Monitoring – 91.230**

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

The City of Toledo uses a comprehensive approach to monitoring progress and performance of HUD's CPD formula grant programs including CDBG, HOME, and ESG. Monitoring ensures long-term compliance with applicable regulations and requirements. The Department of Housing and Community Development (DHCD) manages and monitors the federal grants using a system of continuous communication and evaluation which begins with written agreements with measurable performance standards and consistent with HUD requirements and ends with meeting national objective and affordability compliance.

The DHCD develops a "risk-based" monitoring plan that combines desktop reviews with onsite visits by field staff to assess compliance of all risk levels. The risk assessment will determine the level and type of monitoring to be conducted for each subrecipient. Annually, the DHCD makes site visits to monitor its partners and sub grantees' (other City Departments, subrecipients, and community housing development organizations) programmatic and financial records. The objectives include improving compliance, subrecipient and grantee capacity through training and technical assistance.

The HOME Program monitoring goals are to ensure compliance with a written agreement between the City and the HOME awardee (developer, sub-recipient, or CHDO). Key HOME provisions include type and number of units, project schedule and budget, affordability period and enforcement, occupancy, and income rules, rent and purchase price limits, unit selection, physical standards, etc.

DHCD staff will conduct construction progress and annual reviews of HOME funded projects during the affordability period and require quarterly written progress reports and meetings, barriers, and program changes. Physical inspections for rental projects are conducted in one, two, or three-year intervals depending upon the number of HOME units assisted. An annual desk audit is done to ensure the current HUD Income Limits, rent and occupancy standards, lease and tenant rules, and other requirements are met. Annual occupancy certifications are also part of monitoring. For Tenant Based Rental Assistance (TBRA), recertification is done every three months and leases one year or more require annual property inspections. HUD Production Reports (monthly) and SNAPSHOTS (quarterly) will be shared.

The primary objectives of ESG monitoring is to ensure compliance with timely expenditure of funds, eligibility of beneficiaries, program progress, financial management and overall management. In

addition to on-site monitoring, the Department will utilize information from HUD's Sage HMIS Reporting Repository and Point in Time (PIT) counts as assessment tools.

Results of the monitoring will be communicated in writing to the sub-recipient/agency and will include any non-compliance issues and corrective recommendations for achieving compliance. If a problem persists, progressive sanctions will be imposed appropriate to the issue. When necessary, sub-recipients may be required to attend relevant HUD or DHCD training as part of the corrective action process. Each partner and sub grantee will assist DHCD with collecting data to prepare the annual CAPER, which reports on the progress and accomplishments of each funded activity.

# AP-15 Expected Resources -

## 91.220(c)(1,2)

### Introduction

The City of Toledo receives three annual allocations from HUD. These include Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG). The strategic plan establishes the framework for the efficient allocation of these federal resources available to the Department of Housing and Community Development (DHCD) to accomplish the goals and outcomes described in the Strategic Plan over the next five years. The consolidated plan articulates policies, strategies, goals and objectives which are based on an analysis of the city's housing needs, housing market, homelessness, public service, economic development, and community development needs.

While it is challenging to predict future Federal resources based on Congressional appropriations, the city anticipates receiving approximately **\$46.8 million** in total funding over the 5-year period from July 1, 2025 to June 30, 2030. Funding can fluctuate based on allocation methodologies nationally and based on Congressional funding levels. To project allocations for the next 5 years, funding levels for the previous five years were averaged and used as an estimate for future annual allocations for each of the next 5 years. Based on historical funding levels, it is projected that the City of Toledo will receive the following funding amounts for the 2025-2029 Program Years.

- **CDBG:** \$34,434,897
- **HOME:** \$9,264,206
- **ESG:** \$3,123,982

The city's allocation for PY 2025 include:

- **CDBG:** \$7,046,960.00
- **HOME:** \$1,965,724.17
- **ESG:** \$627,043.00
- **Total:** \$9,639,727.17

An additional \$728,799 in CDBG Prior Year Resources and \$3,787,820.93 in HOME Prior Year Resources is estimated to be utilized for the 2025 Program Year to address priority needs and goals, resulting in a total 5-year budget of \$14,156,347.10. The 2025-2026 program year for the City of Toledo starts on 7/1/2025 and ends on 6/30/2026. It is the first Annual Action Plan related to the goals outlined in the City's 2025-2029 Consolidated Plan.

## Anticipated Resources

Table 15 - Anticipated Resources								
Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				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	\$7,046,960		\$728,799	\$7,775,759	\$27,387,937	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 1				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	\$1,965,724.17		\$3,787,820.93	\$5,753,545.10	\$7,298,482	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 1				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	\$627,043			\$627,043	\$2,496,939	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.

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

CDBG funding is the primary funding source for many of the goals outlined in the Consolidated Plan. HOME and ESG funding also contribute significantly to achieving affordable housing and homeless prevention goals respectively. By combining these federal funds from HUD with other local, state, and federal resources (when applicable), the city is better positioned to address the many needs facing the community. These combined resources, as well as efficiencies created through strategic partnerships with other organizations, give the city an increased capacity to address the needs identified in this Consolidated Plan. In combining HUD funds with other resources when they are available, the city can expand the availability of the many benefits these programs provide. These combined resources are used in efforts to increase homeownership rates for LMI residents, address the crisis of homelessness, create a more suitable living environment, provide decent, safe, and sanitary housing, address blight and decay, and many other beneficial activities.

HOME and ESG funds both have mandated matching requirements. While CDBG funds do not require a match, as a policy of the DHCD, all third-party partners that receive CDBG funds must provide a 1:1 match for each dollar received. This is the same 1:1 match that is mandated by HUD for ESG funds. Applicants for CDBG and ESG funding must identify and document the match in their funding applications. The matching requirement for HOME funds is set by HUD based on criteria related to severe fiscal distress. As stated in CFR 92.218, contributions counted as match must be at least 25% of funds drawn from the HOME program. The city's matching requirement is supported through additional funding utilized by affordable housing developers, which can include New Market Tax Credits, Low-Income Housing Tax Credits, developer equity, and other debt or other financing.

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

To carry out housing, economic and community development activities, CDBG and HOME funded programs may obtain publicly owned land or property through the Lucas County Land Reutilization Corporation (Land Bank). The Land Bank acquires vacant and abandoned foreclosed properties and converts them to productive use. The Land Bank assists eligible residents in purchasing and renovating properties, and partners with community members in utilizing vacant lots from demolitions for re-use by residents, community groups, neighborhood associations, and affordable housing developers. Vacant lots are also sometimes offered to neighboring homeowners to increase lot sizes rather than slated for new construction depending on the neighborhood, density, housing demand, and other factors. The City of Toledo supports the demolition and clearance of vacant, abandoned, and blighted property by allocating funding annually through its Urban Beautification program. The City has torn down almost 1,000 properties from January 2020 until early April 2025 and is scheduled to demolish another 500 properties 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 has a history of funding and participating in multiple community planning efforts with a variety of stakeholders to truly understand the regional and neighborhood concerns of residents. These sessions have led to the development of several community plans with clear vision, goals, objectives, and proposed activities along with possible sources of financing. The City has been investing in these neighborhoods and sees an opportunity to continue to leverage its CDBG, HOME, and ESG funds with other City capital expenditures and private sector financing for targeted neighborhood improvements that directly respond to the needs of the city's residents.

The Consolidated Plan process was used to encourage further collaboration and joint investment of dollars to have the most significant impact. One of the proposed strategies is to use the CDBG Neighborhood Revitalization Strategy Areas to focus federal dollars and align them with other investments. The City is also reviewing its service delivery system to ensure it is both efficient and effective. The use of external organizations including community-based nonprofits to deliver some services instead of internal departments was also discussed and may be an opportunity to invest in more efficient and knowledgeable service delivery by on-the-ground agencies rooted in the lived experiences of the communities they serve. The organizational capacity of subrecipients, greater collaboration and coordination of services, and helping agencies access other sources of funding was also highlighted as critical components of collective impact.

# AP-20 Annual Goals and Objectives

## Goals Summary Information

Table 16 – Goals Summary								
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	Affordable Housing	CDBG: \$250,000  HOME: \$3,831,374.78	Homeowner Housing Added: 4 Household Housing Units  Rental Units Constructed: 12 Household Housing Units
2	Homeownership Opportunities	2025	2029	Affordable Housing	Citywide	Homeownership Opportunities	HOME: \$350,000	Direct Financial Assistance to Homebuyers: 47 Households Assisted
3	Housing Improvements	2025	2029	Affordable Housing	Citywide	Housing Rehabilitation and Home Modifications	CDBG: \$2,825,620  HOME: \$1,375,597.90	Homeowner Housing Rehabilitated: 81 Household Housing Units
4	Slum and Blight Clearance	2025	2029	Affordable Housing	Citywide	Housing Rehabilitation and Home Modifications	CDBG: \$69,500	Housing Code Enforcement / Foreclosed Property Care: 200 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		Fair Housing Planning & Services	CDBG: \$160,000	Public service activities for Low/Moderate Income Housing Benefit: 450 Households Assisted
6	Public Services	2025	2029	Non-Homeless Special Needs	Citywide	Public Services	CDBG: \$1,171,247	Public service activities other than Low/Moderate Income Housing Benefit: 9.075 Persons Assisted
7	Homelessness Services	2025	2029	Homeless	Citywide	Homelessness Services	ESG: \$627,043	Homeless Person Overnight Shelter: 910 Persons Assisted  Tenant-based rental assistance / Rapid Rehousing: 24 Households Assisted
8	Infrastructure & Public Facility Improvements	2025	2029	Non-Housing Community Development	Citywide	Infrastructure & Public Facility Improvements	CDBG: \$1,550,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15,490 Persons Assisted
9	Economic Development	2025	2029	Non-Housing Community Development	Citywide	Economic Development	CDBG: \$150,000	Businesses Assisted: 45 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				CDBG; \$1,599,392  HOME: \$196,572.42	Other: 11

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing Development
	<b>Goal Description</b>	Funds will be used to assist in the creation or preservation of affordable housing units for rental and homeownership.
2	<b>Goal Name</b>	Homeownership Opportunities
	<b>Goal Description</b>	Funds will be used to support low- and moderate-income residents in accessing homeownership through the Home at Last downpayment assistance program.
3	<b>Goal Name</b>	Housing Improvements
	<b>Goal Description</b>	Funds will be used to support low- and moderate-income residents in the rehabilitation 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	<b>Goal Name</b>	Slum and Bight Clearance
	<b>Goal Description</b>	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	<b>Goal Name</b>	Fair Housing Planning & Services
	<b>Goal Description</b>	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	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	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	<b>Goal Name</b>	Homelessness Services
	<b>Goal Description</b>	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	<b>Goal Name</b>	Infrastructure & Public Facility Improvements
	<b>Goal Description</b>	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	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	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	<b>Goal Name</b>	Planning and Administration
	<b>Goal Description</b>	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 coordinate the use of federal funds for the City's strategies and actions to meet the needs of low- to moderate-income households and communities.

The following are the proposed projects that will be undertaken in the 2025 (51st) PY with CDBG, HOME, and ESG funding to address the Consolidated Plan's priority needs and objectives. The total amount of funding for these projects include:

- CDBG: \$7,775,759.00
- HOME: \$5,753,545.10
- ESG: \$627,043.00
- Total: \$14,156,347.10

### Projects

Table 17 – Project Information	
#	Project Name
1	DHCD: Planning and Administration
2	Division of Housing Program Delivery
3	Housing Preservation/Rehabilitation Fund
4	Community Housing Development Organization (CHDO) Set-aside
5	Homeowner Rehabilitation (Subrecipient & Internal)
6	COT Rooftops Program
7	Rental Housing Development
8	Down-Payment Assistance (HOME At Last Program)
9	Homelessness Services
10	Public Services
11	CBDO Public Service - Believe Center
12	Historic South Initiative OSE Infill Housing
13	Maumee Valley Habitat for Humanity Roof Replacements
14	Pathway, Inc. Senior Emergency Repair for Housing
15	Fair Housing Center Housing Services (Admin Expense)
16	Department of Economic Development
17	Inclusive of Women DBA Women of Toledo Business Assistance
18	Section 108 loan Debt Service
19	COT: Division of Parks and Youth Services
20	Mayores Senior Center Roof Repair
21	Lutheran Social Services Building Expansion

22	Toledo Lucas County Health Department (Rodent Control Grant)
23	Toledo Neighborhood Capacity Building Institute

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

The following projects and allocation amounts were derived based on the comprehensive research, data analysis, consultation, and citizen participation processes discussed in the Needs Assessment, Markey Analysis, and Strategic Plan sections of the 2025-2029 Five-Year Consolidated Plan. As a result of the analysis, 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 calculated as described in the SP-25 and SP-45 Sections.

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 though needs continue to increase, housing and non-housing funding is insufficient to meet the demand for unmet needs. In recent years, the total amount of funding requested has frequently exceeded the total amount available. Inadequate financial resources have also been identified as the most significant barrier to organizations serving underserved needs. Agencies consulted highlighted a shortage of volunteers, increased collaboration among social service agencies, employee turnover and capacity, client transportation needs, program eligibility limits and marketing, and a lack of awareness of program offerings as hurdles to serving underserved needs.

In order to ensure fair housing, the city contracted with the Toledo Fair Housing Center from 2024 to 2025 to conduct an Analysis of Impediments to Fair Housing Choice (AI), which identified impediments to getting safe, adequate, and decent affordable housing. In conjunction with community partners, the city and the Fair Housing Center have implemented a Fair Housing Action Plan to reduce barriers to fair and affordable housing.

# AP-38 Project Summary

## Project Summary Information

1	<b>Project Name</b>	<b>DHCD: Planning and Administration</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	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 Planning and Administration
	<b>Needs Addressed</b>	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
	<b>Funding</b>	<b>CDBG: \$1,249,392</b> <b>HOME: \$196,572.42</b>
	<b>Description</b>	The general operations in terms of administration and reporting requirements, program administration and staff monitoring, neighborhood revitalization, and fiscal oversight.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will not directly benefit low/moderate income residents but is necessary for the effective management of the CDBG, HOME, and ESG programs.
	<b>Location Description</b>	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
2	<b>Planned Activities</b>	Administration and compliance of all grant activities, functions, and procedures. Technical assistance for all subgrantees as needed. Staffing and overhead costs related to the planning, administration, development, and implementation of the Consolidated Plan, Annual Action Plan, and CAPER; information tracking and compilation; federal grant reporting; IDIS data input; fiscal oversight; monitoring (on-site monitoring visits, review and evaluation of agency information, assessment of progress and completion of activities, compliance with Federal regulations, and so on); general administration of funds and related activities.
	<b>Project Name</b>	<b>DHCD: Division of Housing Program Delivery</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing Improvements
	<b>Needs Addressed</b>	Housing Improvements
	<b>Funding</b>	<b>CDBG: \$600,000</b>

	<b>Description</b>	Funding to support staffing costs associated with the Department of Housing and Community Development Housing Division for program delivery expenses, including application Intake, underwriting, construction and project management, inspections, monitoring, and other related expenses for the city's and third party partners home repair programs.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will not directly benefit low/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.
	<b>Location Description</b>	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
	<b>Planned Activities</b>	Owner-Occupied Rehabilitation; Homebuyer unit production through new construction or acquisition; rehabilitation and resale; down payment and closing costs through the Home-At-Last Program; Paint, Roof, and Emergency Repair Programs; Lead-Based Paint Hazard Programs; and Rental Housing Development Projects are among the activities related to the administration duties of the Housing Division.
<b>3</b>	<b>Project Name</b>	<b>Housing Preservation/Rehabilitation Fund</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing Improvements
	<b>Needs Addressed</b>	Housing Improvements
	<b>Funding</b>	<b>CDBG: \$1,028,799</b>
	<b>Description</b>	Funding for the substantial rehabilitation of homeowner-occupied housing in the City of Toledo, including materials and construction costs.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 5 LMI households will benefit from this project.
	<b>Location Description</b>	Housing units will be located throughout the city of Toledo.
	<b>Planned Activities</b>	Owner-occupied housing rehabilitation, or housing rehabilitation and resale.
<b>4</b>	<b>Project Name</b>	<b>Community Housing Development Organization (CHDO) Set-Aside</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Affordable Housing Development
	<b>Needs Addressed</b>	Affordable Housing Development
	<b>Funding</b>	<b>HOME: \$823,525.78</b>
	<b>Description</b>	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).
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 3 LMI households will benefit from this project.
	<b>Location Description</b>	Housing units will be located throughout the city of Toledo.
	<b>Planned Activities</b>	New construction of homeownership housing.
<b>5</b>	<b>Project Name</b>	<b>Homeowner Rehabilitation (Subrecipient and Internal)</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing Improvements

	<b>Needs Addressed</b>	Housing Improvements
	<b>Funding</b>	<b>HOME: \$1,375,597.90</b>
	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<b>8</b> low- and moderate-income homeowners will benefit from this activity.
	<b>Location Description</b>	Housing units will be located throughout the city of Toledo.
	<b>Planned Activities</b>	Homeowner housing rehabilitation to address code violations, health and safety concerns, and lead-based paint hazards.
<b>6</b>	<b>Project Name</b>	<b>COT Rooftops Program</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing Improvements
	<b>Needs Addressed</b>	Housing Improvements
	<b>Funding</b>	<b>CDBG: \$396,821</b>
	<b>Description</b>	To provide roof repair or replacement services in the City of Toledo.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<b>18</b> low- and moderate-income households will benefit from a roof repair/replacement.
	<b>Location Description</b>	Housing units will be located throughout the city of Toledo.
	<b>Planned Activities</b>	Roof repairs/replacements for low- and moderate-income households.
<b>7</b>	<b>Project Name</b>	<b>Rental Housing Development</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Affordable Housing Development
	<b>Needs Addressed</b>	Affordable Housing Development
	<b>Funding</b>	<b>HOME: \$3,007,849</b>
	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<b>12</b> low- and moderate-income households will benefit from this project.
	<b>Location Description</b>	Housing units will be located throughout the city of Toledo.
	<b>Planned Activities</b>	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.
<b>8</b>	<b>Project Name</b>	<b>Down-Payment Assistance (HOME At Last Program)</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeownership Opportunities
	<b>Needs Addressed</b>	Homeownership Opportunities
	<b>Funding</b>	<b>HOME: \$350,000.00</b>

	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	47 low- and moderate-income households will benefit from this project.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Provision of direct financial assistance to low- and moderate-income homebuyers for down payments and closing costs.
<b>9</b>	<b>Project Name</b>	<b>2025 Homelessness Services</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homelessness Services
	<b>Needs Addressed</b>	Homelessness Services
	<b>Funding</b>	<b>ESG: \$627,043</b>
	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 910 homeless individuals will be provided with shelter, and another 24 households will receive rapid rehousing assistance.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	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.
<b>10</b>	<b>Project Name</b>	<b>Public Services</b>
	<b>Target Area</b>	Citywide Junction Choice Neighborhood NRSA Old South End NRSA Vistula Neighborhood
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	<b>CDBG: \$1,056,247</b>
	<b>Description</b>	Various public service activities provided by nonprofit subrecipient agencies throughout the city.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 9,075 low- and moderate-income persons will be assisted. Among them, 1,000 will be in the Junction Choice Neighborhood NRSA, 400 in Old South End NRSA, and 45 in the Vistula neighborhood.
	<b>Location Description</b>	Public service activities will be provided throughout the city of Toledo.
	<b>Planned Activities</b>	Arts Commission Cherry Street Mission 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 Sofia Quintero Art & Cultural Center That Neighborhood Church Toledo GROWs
11	<b>Project Name</b>	<b>CBDO Public Service - Believe Center</b>
	<b>Target Area</b>	Old South End NRSA
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	<b>CDBG: \$115,000</b>
	<b>Description</b>	Funding for the Believe in Youth program to provide opportunities for physical activity, life skills development, and community engagement for youth in the Old South End NRSA.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 75 low- and moderate-income youth in the Old South End NRSA will be assisted.
	<b>Location Description</b>	1 Aurora L Gonzalez Drive, Toledo, OH 43609
	<b>Planned Activities</b>	Youth program offers a wide variety of sports programming and activities designed to promote physical health and wellness and to instill valuable life lessons such as teamwork, sportsmanship, discipline, and leadership skills.
12	<b>Project Name</b>	<b>Historic South Initiative OSE Infill Housing</b>
	<b>Target Area</b>	Old South End NRSA
	<b>Goals Supported</b>	Affordable Housing Development
	<b>Needs Addressed</b>	Affordable Housing Development
	<b>Funding</b>	<b>CDBG: \$250,000</b>
	<b>Description</b>	Rehabilitation for a single-family home in the Old South End for purchase by a low- to moderate-income household.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One LMI household will benefit from this project
	<b>Location Description</b>	Old South End NRSA
	<b>Planned Activities</b>	Rehabilitation for a single-family home in the Old South End for purchase by a low- to moderate-income household.
13	<b>Project Name</b>	<b>Maumee Valley Habitat for Humanity Roof Replacements</b>
	<b>Target Area</b>	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA
	<b>Goals Supported</b>	Housing Improvements
	<b>Needs Addressed</b>	Housing Improvements
	<b>Funding</b>	<b>CDBG: \$450,000</b>
	<b>Description</b>	Homeowner housing rehabilitation, primarily roofing, for low-to-moderate income, owner-occupied households throughout the city of Toledo, and within the Old South End, Englewood, and Junction Choice Neighborhood NRSAs.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number</b>	<b>22</b> LMI households will benefit from this project, 10 located throughout the

	<b>and type of families that will benefit from the proposed activities</b>	city, 4 in the Old South End NRSA, 4 in the Englewood NRSA, and 4 in the Junction Choice Neighborhood NRSA.
	<b>Location Description</b>	Homes located throughout the city of Toledo and in specific NRSA areas.
	<b>Planned Activities</b>	Rehabilitation of owner-occupied homes, primarily roofing.
<b>14</b>	<b>Project Name</b>	<b>Pathway, Inc. Senior Emergency Repair for Housing</b>
	<b>Target Area</b>	Citywide Englewood NRSA
	<b>Goals Supported</b>	Housing Improvements
	<b>Needs Addressed</b>	Housing Improvements
	<b>Funding</b>	<b>CDBG: \$350,000</b>
	<b>Description</b>	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 Englewood NRSA.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	28 LMI senior and/or disabled households will benefit from this project, 16 throughout the city and 12 in the Englewood NRSA.
	<b>Location Description</b>	Homes located throughout the city of Toledo and in Englewood NRSA.
	<b>Planned Activities</b>	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.
<b>15</b>	<b>Project Name</b>	<b>Fair Housing Opportunities of Northwest Ohio</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Fair Housing Planning & Services
	<b>Needs Addressed</b>	Fair Housing Planning & Services
	<b>Funding</b>	
	<b>Description</b>	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).
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	450 households potentially facing housing discrimination will benefit from this activity.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	The planned activities include the following administrative activities related to housing discrimination: <ul style="list-style-type: none"> <li>▪ Fair Housing Enforcement;</li> <li>▪ Trainings (for the public and the housing industry);</li> <li>▪ Information dissemination at outreach events; and</li> <li>▪ Implementation of action steps identified in the current Analysis of Impediments (AI).</li> </ul>
<b>16</b>	<b>Project Name</b>	<b>COT: Department of Economic Development</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Economic Development



	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	<b>CDBG: \$100,000</b>
	<b>Description</b>	Forgivable economic development loans for leasehold improvements, inventory, furniture and fixtures, equipment, software or Point-of-Sale systems, or professional services.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<b>5</b> Toledo microenterprise small businesses will benefit from this project.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Forgivable economic development loans for leasehold improvements, inventory, furniture and fixtures, equipment, software or Point-of-Sale systems, or professional services.
<b>17</b>	<b>Project Name</b>	<b>Economic Empowerment Initiative for Toledo</b>
	<b>Target Area</b>	Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	<b>CDBG: \$50,000</b>
	<b>Description</b>	Small business one-on-one technical assistance, business seminars, and business mentoring program.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<b>40</b> Toledo microenterprise businesses will be assisted.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Forgivable economic development loans for leasehold improvements, inventory, furniture and fixtures, equipment, software or Point-of-Sale systems, or professional services.
<b>18</b>	<b>Project Name</b>	<b>HUD Section 108 Debt Service</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	<b>CDBG: \$200,000</b>
	<b>Description</b>	Repayment of Section 108 loan.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
	<b>Planned Activities</b>	Repayment of Section 108 loan.
<b>19</b>	<b>Project Name</b>	<b>COT: Division of Parks and Youth Services</b>
	<b>Target Area</b>	Citywide Old South End NRSA
	<b>Goals Supported</b>	Infrastructure & Public Facility Improvements
	<b>Needs Addressed</b>	Infrastructure & Public Facility Improvements

	<b>Funding</b>	<b>CDBG: \$1,000,000</b>
	<b>Description</b>	Revitalization of five parks (Collings Park, Dale Stone Park, Detwiler Pool Demolition, Greenwood Park, and Mayfair Park) located in the City of Toledo.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 15,000 Toledo residents will benefit from this project, including 1,460 residents in the Old South End NRSA (Dale Stone Park Playground Replacement).
	<b>Location Description</b>	Collings Park, Dale Stone Park, Detwiler Pool Demolition, Greenwood Park, and Mayfair Park
	<b>Planned Activities</b>	Collins Park: purchase and installation of new play equipment, and execution of associated sitework. Dale Stone Park: removal of the current play equipment, purchase and installation of new play equipment, and execution of associated sitework. Detwiler Pool Demolition: demolition of the pool and all associated structures. Greenwood Park: removal of the current play equipment, purchase and installation of new play equipment, and execution of associated sitework. Mayfair Park: removal of the current play equipment, purchase and installation of new play equipment, and execution of associated sitework.
<b>20</b>	<b>Project Name</b>	<b>Mayores Senior Center Roof Repair</b>
	<b>Target Area</b>	Old South End NRSA
	<b>Goals Supported</b>	Infrastructure & Public Facility Improvements
	<b>Needs Addressed</b>	Infrastructure & Public Facility Improvements
	<b>Funding</b>	<b>CDBG: \$250,000</b>
	<b>Description</b>	Replacement of the roof at the Mayores Senior Center.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 440 senior residents of the Old South End NRSA will benefit from this project.
	<b>Location Description</b>	2 Aurora L Gonzalez Drive, Toledo, OH 43609
	<b>Planned Activities</b>	Replacement of the roof at the Mayores Senior Center.
<b>21</b>	<b>Project Name</b>	<b>Lutheran Social Services Building Expansion</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Infrastructure & Public Facility Improvements
	<b>Needs Addressed</b>	Infrastructure & Public Facility Improvements
	<b>Funding</b>	<b>CDBG: \$300,000</b>
	<b>Description</b>	Expansion of the current office by adding a 7,240 square foot expansion, creating additional space for the revitalization and the successful implementation of an expanded Employer Resource Network Program.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 50 Toledo residents will benefit from this project through the expansion of the Employer Resource Network Program.
	<b>Location Description</b>	2149 Collingwood Blvd., Toledo, OH 43620
	<b>Planned Activities</b>	Expansion of the current office by adding a 7,240 square foot expansion, creating additional space for the revitalization and the successful implementation of an expanded Employer Resource Network Program.

22	<b>Project Name</b>	<b>Toledo Lucas County Health Department (Rodent Control Grant)</b>
	<b>Target Area</b>	Citywide Junction Choice Neighborhood NRSA South End NRSA Englewood NRSA Vistula Neighborhood
	<b>Goals Supported</b>	Slum and Blight Clearance
	<b>Needs Addressed</b>	Slum and Blight Clearance
	<b>Funding</b>	<b>CDBG: \$69,500</b>
	<b>Description</b>	The administrative costs of proactive rodent inspections and follow-up actions such as citations and court nuisance orders.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 200 housing units throughout Toledo will benefit from this project, including approximately 25 housing units in each of the 4 NRSAs.
	<b>Location Description</b>	Housing units located throughout the city of Toledo and the geographic priority areas.
	<b>Planned Activities</b>	The administrative costs of proactive rodent inspections and follow-up actions such as citations and court nuisance orders.
23	<b>Project Name</b>	<b>Toledo Neighborhood Capacity Building Institute (TNCBI)</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	<b>CDBG: \$150,000</b>
	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<b>10</b> non-profit organizations
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	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.

## AP-50 Geographic Distribution – 91.220(f)

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

In general, various federally grant-funded activities, such as public services, economic development, housing rehabilitation, home modifications, and new construction activities, are offered on a citywide basis to low- and moderate-income (LMI) individuals and households pursuant to related CDBG, HOME, and ESG regulations. Additionally, the City has identified and mapped areas of the municipality where the LMI population is 51% or more. LMI census tracts are: 8, 9, 10.01, 10.02 11, 12.02, 13.02, 14, 15, 16.01, 16.02, 17, 18, 19, 20, 24.01, 24.02, 25, 26, 27, 28, 29, 30, 31, 32, 33, 35, 36, 39.01, 39.02, 40, 42, 46, 47.01, 47.02, 48, 49, 50, 51.01, 51.02, 52, 53, 54, 57.01, 59.02, 66, 67, 68.01, 68.02, 73.02, 73.06, 73.07, 103, 105 and 106. Relevant area benefit activities will be located exclusively in these areas.

There are four additional target areas in Toledo for specific place-based strategies to reach the goals outlined in the Five-Year Consolidated Plan. The percentage of funds to be distributed to these geographic areas are as follows.

### Geographic Distribution

Table 18 - Geographic Distribution	
Target Area	Percentage of Funds
Citywide	88.8%
Englewood NRSA	2.0%
Old South End NRSA	7.3%
Junction Choice Neighborhood NRSA	1.4%
Vistula Neighborhood	0.5%

### 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 2025-2026, approximately \$1.6 million has been allocated to various housing and service programs in the geographic priority areas. These include the three Neighborhood Revitalization Strategy Areas (NRSAs), as well as the Vistula Neighborhood which is currently being investigated as an additional NRSA.

Activities will be carried out by Community Based Development Organizations (CBDOs) and nonprofit service agencies. In October 2023, Requests for Proposals (RFPs) were released for CBDOs. The city reviewed and approved five agencies. These agencies' certifications will be valid

from July 1, 2024 until June 30, 2025. There are four CBDOs that have submitted recertifications which will be completed by July 1, 2025. In addition, new CBDO applications will be solicited, with the goal of certifying additional organizations to also take effect by July 1, 2025.

In the Old South End NRSA, an approved CBDO will be 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, homeowner rehabilitation, and park improvements.

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.

The final neighborhood is the historic Vistula neighborhood. The sole activity funding concentrated in this area is an afterschool program. The city is currently engaged with a consultant to prepare another NRSA application for this neighborhood. In the event the NRSA is approved, it is being added as a fourth geographic target area.

## **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 makes affordable housing available through a variety of methods, including the use of CDBG, HOME, and ESG funding. The city will use funding to support affordable housing during the 2025 PY through rental and security deposit assistance, supportive services, the building of new units, the acquisition and rehabilitation of existing units, owner-occupied home improvements, and permanent supportive housing.

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

Table 19 - One Year Goals for Affordable Housing by Support Requirement	
One Year Goals for the Number of Households to be Supported	
Homeless	24
Non-Homeless	94
Special Needs	50
Total	168

Table 20 - One Year Goals for Affordable Housing by Support Type	
One Year Goals for the Number of Households Supported Through	
Rental Assistance	24
The Production of New Units	16
Rehab of Existing Units	81
Acquisition of Existing Units	47
Total	168

### Discussion

The demand for safe and affordable housing units for extremely low-, very low-, and low-income families remains extremely high. The COT intends to continue exploring additional alternatives that address this need and will identify significant activities that will assist in reaching the City's high priority. In addition, the city is working on other affordable housing and rental home construction efforts. In collaboration and partnership with developers, we encourage new construction and the preservation of affordable rental units. The city provided gap funding using ARPA, HOME, and ERA2 reallocated funds.

As discussed in Section MA-10, there are several major developments that have been recently completed or are in the process of development throughout the city. These housing developments

will create approximately 1,875 units of new housing, including market-rate, affordable, senior housing, public housing, and permanent supportive housing. The COT has invested over \$28 million in federal funds to support the creation of affordable housing throughout the city. As of April 2025, there were 880 units of affordable housing in development or pending construction.

# AP-60 Public Housing – 91.220(h)

## Introduction

Lucas Metropolitan Housing (LMH) will pursue the following strategies and related actions in the 2025-2026 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:

- 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 plans to update and finalize 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 on a tiered approach to address the unmet capital needs backlog and build new mixed income communities of choice.

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 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:

- Park Apartments - 45 apartments for Transition Age Youth (TAY) - \$15 million investment.
- Collingwood Green V - 75 apartments for Seniors - \$28 million investment.
- Palmer Gardens - 75 apartments - mixed income families - \$15 million investment.



- Thurgood Marshall – 87 apartments for Seniors - \$35 million investment.
- TenEyck Towers - 154 apartments - elderly disabled - \$15 million.

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.

**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. LMH's non-profit affiliate Lucas Housing Services Corporation became a HUD Certified Counseling Agency in 2024. Through this work, LMH will:

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

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

Not Applicable. The PHA is not designated as troubled.

# **AP-65 Homeless and Other Special Needs**

## **Activities - 91.220(i)**

### **Introduction**

The Toledo Lucas County Homelessness Board (TLCHB), 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 persons with lived experience.

The CoC board aims to move from a closed to an open HMIS system. 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 less 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.

The CoC is striving to increase coordination among community partners related to outreach and homelessness. TLCHB staff coordinate regularly with the PATH and HOPE outreach teams that are connected to persons 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 and various city staff concerning local encampments and participant engagement, which has also included training of local metro park staff as they have taken over several city owned properties. 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.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

TLCHB staff are coordinating with shelters on a weekly basis to identify staff training to solve service provision issues in real-time. This will continue to be included as part of the ongoing overhaul of the CES to provide input into system workflows. This group is striving to increase bed capacity, which is often impacted by the limitations of the under-sourced 2-1-1 CE access point. Small system changes will be implemented using the Plan, Do, See, Act or PDSA model of quality improvement with the goal of increasing communication of shelter referrals, thus increasing bed utilization, and the end goal of reducing time spent homeless for persons in need.

Service Prioritization Decision Assistance Tool (SPDAT) meetings will continue to coordinate and collaborate with local Domestic Violence (DV) shelters and transitional housing to identify safe, affordable housing options for their participants, using the same assessment options until a new option is identified.

The CoC and partners will continue to collaborate for the progress of PSH unit developments for youth at Park Apartments (45 units), and chronically homeless individuals at both Warren Commons (46 units) and Mission Point (45-50 units).

The CoC will continue to refine the use of housing problem-solving efforts through the provisions of the Ohio Department of Development HCRP funds for assessment, problem-solving, and resolution in homelessness prevention and rapid re-housing programs, especially for families.

### **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 has a goal of transitioning to an open HMIS system (vs. a closed system) and exploring 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 persons and families, families with children, veterans and their families, and unaccompanied minors.

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

Chronically homeless persons 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 supports 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. Toledo-Lucas County's Eviction Prevention Partnership, a collaborative partnership comprised of eleven local agencies and organizations dedicated to providing a holistic approach to eviction prevention, was developed through Emergency Rental Assistance II funds in April 2022. These services can be continued through the provision of the Ohio Development Department's HCRP funds. These activities explain programmatic processes both within community resources, negotiate alternatives to legal evictions, refer to partners within the Eviction Prevention Partnership, and provide basic mediation and problem-solving between tenants and landlords.

## **Discussion**

The CoC seeks to use improved data, and HUD has developed tools for evaluating data to better inform the prioritization and development of future resources in the community. This will include any decisions to change any funding priorities towards specific service delivery types or even specific populations.

# 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.

Regardless, 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 outlines a comprehensive set of strategies to remove or mitigate barriers to affordable housing.

In January of 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 will address two significant barriers to affordable housing production and preservation in the City of Toledo: an outdated zoning code; and a weak market for new or preserved housing. Toledo will use this funding to assist in ameliorating affordable housing production in the following ways:

- Comprehensive update of the Toledo Planning and Zoning Code and development standards;
- Reducing costs for new affordable housing production by developing and approving housing design templates to be made available to housing developers; and
- Appraisal gap financing to incentivize housing production in targeted weak market neighborhoods, including the Geographic Target Areas of the Consolidated Plan.

These strategic actions aim to promote housing equity, dismantle systemic barriers, and ensure fair access to housing across Toledo, especially for vulnerable and historically marginalized communities. Let me know if you'd like a formatted table or visual summary of these points.

### **Discussion:**

The City of Toledo has adopted local source of income discrimination laws and other measures in its local anti-discrimination law. However, currently, this law is not being enforced. It is important that the city develop systems and processes to pursue enforcement of this local law. This should include amending local laws further as may be necessary to facilitate this process.

Toledo currently employs significant restrictions on group homes for persons with disabilities, which invokes outdated and offensive terminology. The Ability Center, The Fair Housing Center, and the Mental Health and Recovery Services Board asked that the City update its zoning code to comply with fair housing laws and to better serve persons with disabilities. In 2022, the City did consider a potential change to the zoning code after a study conducted by the Plan Commission; however, this process did not result in an appropriate policy change and did not change the zoning code. City Council did not proceed with a vote on the law and the outdated zoning laws remain.

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

Enforcement of the City of Toledo's local lead poisoning prevention law remains an extremely important barrier to fair housing choice. Housing conditions are identified as an important

impediment to fair housing choice in Toledo. The city should ensure that an appropriate level of resources and staffing is dedicated to the implementation of the law, and this should be monitored closely.



## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The City of Toledo is committed to meeting the needs of the underserved through program administration and collaboration with community partners. The city intends to assist the underserved by constructing and conserving affordable housing, reducing lead-based paint hazards, and reducing the number of families living in poverty through the services offered by community partners and other area organizations.

The city will continue to explore ways to form alliances and partnerships with all sectors of the local community. The DHCD improves understanding of community agencies and resources through mandatory quarterly trainings for CDBG and ESG-funded agencies. Speakers from neighborhood organizations are also invited to address the City's partners, sharing their knowledge and experiences. Networking and information exchange are encouraged to improve community service coordination.

Additionally, through the consultation process, several agencies spoke to the need for better coordination and collaboration among the various agencies and providers who often spoke of duplicative activities in the city. Focus group discussions further highlighted potential opportunities of organizing larger neighborhood-based collective impact models of programming, service delivery, and neighborhood improvements. While the city was once rich with Community Development Corporations, over time, these agencies have since closed. There are strong neighborhood-based community agencies and associations which typically operate independently; however, they could be important partners in a broad-based catalyzing collective impact effort in various neighborhoods in the city, including the specific geographic target areas: Englewood NRSA, Junction Choice Neighborhood NRSA, Old South End NRSA, and Vistula Neighborhood. The city is interested in exploring collective impact models more fully and identifying a specific effort that may serve as a pilot model that is rooted in the collective efforts of a network of locally based community organizations working together to maximize the impact of the investment in a neighborhood.

### **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 development in Toledo. A NOFA for Affordable Rental and Supportive Housing was issued on June 27, 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, as discussed in Sections SP-55 and AP-75. 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 will use various initiatives, as well as funds from the HOME, HOME-ARP, ARPA, ERA, and CDBG programs, to maintain and foster affordable housing. The goals identified in the Strategic Plan and the Action Plan include the construction and acquisition of affordable homes, rehabilitation of existing housing stock, home-buyer assistance, home repair programs for the elderly and disabled, emergency rental assistance, and housing services for non-homeless special needs populations. The goals of the Annual Action Plan also included funding to increase the capacity of local non-profit community development corporations to develop affordable housing and/or attract larger for-profit developers to develop low-income housing tax credit rental units.

The 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. 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.

The DHCD administers a Lead-Based Paint Hazard Control Grant program (OHLHD0453-20) received from HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH). The \$5.7 million grant is utilized to provide financial assistance to property owners to help control lead paint hazards in both owner-occupied and rental residential units within the COT. The initial 42-month period of performance for the grant began on 04/01/21 and concludes on 06/30/24. In order to maximize all funding from OHLHD0453-20 and complete as many units as possible the DHCD requested a no-cost extension of the period of performance to twelve (12) months beyond the original expiration date, extending that contact from 06/30/24 to 06/30/25.

Over the life of OHLHD0453-20, a 42-month grant period, the DHCD has proposed to complete 175 lead inspection risk assessments and make 175 residential units in the COT lead-safe. The DHCD has benchmarked the completion of 96 lead inspection risk assessments and 112 residential units made lead safe under OHLHB0636-20 during the 2024–2025 Action Plan (07/01/24-06/30/25).

Additional multi-year funding was received from the OLHCHH to pilot a cooperation demonstration between the city's lead hazard reduction grant programs and the NeighborWorks weatherization program. The award provided \$1,000,000 to make 40 units lead-safe, along with air quality restoration. The period of performance runs from 07/29/21 to 07/28/24, however the DHCD will also be requesting a no-cost extension of the period of performance to 07/28/25.

It is anticipated that 29 lead inspection risk assessments will be performed and 39 residential units will be made lead-safe under this grant during the 2024–2025 Action Plan year.

The DHCD also received funding through a 3-year contract with the local health department to utilize BP- Husky settlement funds to make 40 units lead-safe. The contract began on 05/01/21, and was to continue up to 03/25/23; however, a two-year extension was granted with a period ending on 03/25/25. It is anticipated that approximately 26 additional units funded through this source will be made lead-safe during the stated action plan period.

The DHCD applied for and received a \$3,446,000 award from the Ohio Department of Development (ODOD) which was executed on 01/17/24. The grant allows the DHCD to expand its efforts to combat lead poisoning by supporting primary lead-based paint hazard control activities for 50

owner-occupied homes, 30 rental units and 2 childcare facilities. The period of performance is from 12/01/23 to 04/30/26. Specific benchmarks and timelines have not yet been confirmed as the DHCD (along with all other grantees around the State) work with ODOD as they continue to refine the program and publish updated guidelines and requirements. It is anticipated however that a minimum of 50% of the allocated funds with obligated and under contract by June 2024.

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

### **Actions planned to reduce the number of poverty-level families**

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

### **Actions planned to develop institutional structure**

The DHCD recognizes the necessity of maintaining a high level of cooperation while working on projects with other City departments and/or groups. While DHCD administers all aspects of the HUD grant programs, high quality collaboration ensures the greatest possible results and the most efficient use of resources. The city will continue to coordinate activities with partners such as:

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

Each of Toledo's partners brings a unique service element and level of expertise. To achieve the desired community outcomes, it is essential to maintain these partnerships and collaborations. There are numerous connections between the corporate community, religious institutions,

government agencies, housing providers, foundations, and other neighborhood groups that support the underprivileged. There will be more communication with all community stakeholders.

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

The 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 the actions of public service agencies in order to improve the lives of all Toledo residents. These organizations address a variety of family concerns, including homelessness, workforce development, and community health.

### **Discussion:**

The city will continue to pursue diverse and comprehensive approaches to solving the community and economic development issues it faces. It has both challenges and opportunities that the CDBG, HOME, and ESG funds can help influence and impact. Because these funds can be used in such a diverse way to meet the complicated multifaceted aspects of community issues, they remain a significant tool that the city can use towards achieving a vibrant, stable, diverse, quality of life for its residents. However, the lack of resources to truly address the need is one of the most significant challenges faced by the city.

# Program Specific Requirements

## AP-90 Program Specific Requirements – 91.220(l)(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(l)(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	\$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0
5. The amount of income from float-funded activities	0
<b>Total Program Income</b>	<b>\$0</b>

### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.220(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).

Not applicable

**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 four 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.

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 equitable 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 homelessness. People at risk or experiencing homelessness can access the CES through various pathways, ultimately leading them to a centralized point for screening, diversion, and referrals to temporary shelter. While United Way 2-1-1 acts as the main access point, the local, SAMHSA funded PATH Team conducts outreach for unsheltered individuals, who may not be likely to be served and connects them to 211. 211 staff are trained to provide 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 is elevated to CE specialists for Housing Problem Solving for diversion and homelessness prevention components. Households determined to be in need of and eligible for temporary placement services are then referred to participating emergency shelter providers. All screening questions include culturally and linguistically competent questions to reduce cultural and linguistic barriers to housing and services for special populations, including immigrants, refugees, and other first-generation populations; youth; individuals with disabilities; and LGBTQ persons. CE specialists maintain a waitlist and, at the time of the bed opening, use the order of priority from the VI-SPDAT to offer shelter or other available options. The CES covers 100% of the CoC geographic area.

The CoC uses the Service Prioritization Decision Assistance Tool (SPDAT) to determine housing assistance levels. The SPDAT is completed with the household by a case manager, CE Specialist, or other professionals trained by the CoC. The SPDAT produces a standardized score that correlates to a referral for SSO, RRH, or PSH. Client choice and feedback from case management can also be considered to ensure all referrals are person-centered.

All community SPDAT numbers and information are given to TLCHB's Coordinated Entry System Coordinator to be compiled into a common Community SPDAT By-Name List. The Coordinated Entry System Coordinator focuses on speedy referrals to housing programs through prioritization

meetings and voucher applications. Biweekly SPDAT meetings occur with case managers and housing providers to provide a warm handoff. Within the CoC, there are a range of housing programs available to persons experiencing homelessness. 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 HFE CoC Board appoints members to committees responsible for providing feedback on the CES and developing strategies for improvement. The CoC plans to evaluate and update the CES Policy and Procedures in the upcoming year, ensuring inclusivity by involving individuals with lived expertise in homelessness in all committees. The CoC has been selected to participate in an intensive HUD TA Workshop Coordinated Entry: Prioritization and Assessment Community Workshop. COT does not fund outreach activities due to limited funds.

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 housing first principles, participate in HMIS, and participate in the Coordinated Entry System.
- A mandatory application training session is held. The meeting is widely publicized, including postings on the TLCHB website 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 in a timely fashion 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 ten-minute presentation to the CRC and answering any relevant questions about their request 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.

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 either through a board appointment from the COT or as an elected director. Recommendations and/or nominations from the constituency are preferred. Three seats on the

CoC HFE Board are specifically designated to be filled by persons with lived experience. The nature of TLCHB CoC/ESG planning oversight work gives ample opportunity to engage those experiencing homelessness and/or those who have recently experienced homelessness toward the end of involving them in decision-making processes, including serving on standing committees and focus groups.

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." Targets 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, homeless prevention, and rapid re-housing activities are applicable to the evaluation of ESG activities. These measures are evaluated during TLCHB monitoring visits, and snapshots of performance are provided to the COT quarterly or annually. Annualized snapshots are provided 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 already predetermined based on the activity type or category. Each category has subcategories in IDIS. The grantee may not choose their performance objectives and outcomes; applicable objectives and outcomes as established in IDIS are as follows:

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

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

# Appendix - Alternate/Local Data Sources

1	<b>Data Source Name</b> ACS 2019-2023 5-Year Estimates
	<b>List the name of the organization or individual who originated the data set.</b> ACS 2019-2023 5-Year Estimates
	<b>Provide a brief summary of the data set.</b> American Community Survey data
	<b>What was the purpose for developing this data set?</b> Data available through the U.S. Census Bureau to provide information for Needs Assessment and Market Analysis
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Data gathered for City of Toledo, OH
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2019-2023
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Completed
2	<b>Data Source Name</b> CHAS 2017-2021 5-Year Estimates
	<b>List the name of the organization or individual who originated the data set.</b> Comprehensive Housing Affordability Strategy
	<b>Provide a brief summary of the data set.</b> The CHAS special tabulation is a count of the number of households (or housing units) that have certain combinations of HUD-specified characteristics, summarized for HUD-specified geographies.
	<b>What was the purpose for developing this data set?</b> Data is used to provide information for the Needs Assessment.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> City of Toledo, OH
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2017-2021
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete
3	<b>Data Source Name</b> PIC (PIH Information Center)
	<b>List the name of the organization or individual who originated the data set.</b> U.S. Department of Housing and Urban Development
	<b>Provide a brief summary of the data set.</b> Inventory of Public Housing.
	<b>What was the purpose for developing this data set?</b> Data is used to provide information for the Needs Assessment and Market Analysis.

	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Comprehensive data for the City of Toledo, OH.</p> <p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2024</p> <p><b>What is the status of the data set (complete, in progress, or planned)?</b> Complete</p>
4	<p><b>Data Source Name</b> 2023 Employment ES-202</p> <p><b>List the name of the organization or individual who originated the data set.</b> Massachusetts Executive Office of Labor and Workforce Development (EOLWD)</p> <p><b>Provide a brief summary of the data set.</b> Average Employment by Industry</p> <p><b>What was the purpose for developing this data set?</b> Data is used to provide information for the Needs Assessment and Market Analysis.</p> <p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> City of Toledo, OH</p> <p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2023</p> <p><b>What is the status of the data set (complete, in progress, or planned)?</b> Complete</p>
5	<p><b>Data Source Name</b> Homeless Assessment: HMIS 2024</p> <p><b>List the name of the organization or individual who originated the data set.</b> Toledo / Lucas County Homelessness Board</p> <p><b>Provide a brief summary of the data set.</b> This data a pulled from the homeless management information system. It includes data from a Point-In-Time Count and annual data.</p> <p><b>What was the purpose for developing this data set?</b> To meet the reporting requirements of the Consolidated Plan.</p> <p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> This is comprehensive data, targeted to homeless persons in the jurisdiction.</p> <p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2024</p> <p><b>What is the status of the data set (complete, in progress, or planned)?</b> Complete</p>
6	<p><b>Data Source Name</b> Housing Inventory Count, 2024</p> <p><b>List the name of the organization or individual who originated the data set.</b> U.S. Department of Housing and Urban Development</p>

	<b>Provide a brief summary of the data set.</b> The Housing Inventory Count is an inventory of the number of beds by type of homeless housing and the sub-populations those beds are targeted toward.
	<b>What was the purpose for developing this data set?</b> To comply with the Consolidated Plan requirements.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> This data is comprehensive for the jurisdiction and the number of beds available to provide homeless housing assistance.
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2024
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete
7	<b>Data Source Name</b> 2024 Community Needs Assessment Survey
	<b>List the name of the organization or individual who originated the data set.</b> CEW Advisors, Inc.
	<b>Provide a brief summary of the data set.</b> Online housing and community needs survey of Toledo residents.
	<b>What was the purpose for developing this data set?</b> Data used to provide information for the Needs Assessment.
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b> 2024
	<b>Briefly describe the methodology for the data collection.</b> Online survey
	<b>Describe the total population from which the sample was taken.</b> Total population of the City of Toledo, OH

**SF-424s  
AND  
CERTIFICATIONS**



**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:**

08/01/2025

**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:**

Lucas

**\* State:**

OH: Ohio

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

43604-2209

**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:**

U.S. 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:**

51st 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.

Add Attachment

Delete Attachment

View Attachment

### 17. Proposed Project:

\* a. Start Date:

\* b. End Date:

### 18. Estimated Funding (\$):

* a. Federal	<input type="text" value="7,046,960.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="7,046,960.00"/>

### \* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

### \* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 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: 2/28/2027

**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. 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: [Insert below the Name and title of the Authorized Representative, name of Organization and the date of signature]:

\*Authorized Representative Name:

Wade Kapszukiewicz

\*Title: Mayor, City of Toledo

\*Applicant/Recipient 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

Wade Kapszukiewicz

\* Date: (mm/dd/yyyy): X

07/09/2025

---

**Public Reporting Burden Statement:** The public reporting burden for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7<sup>th</sup> St SW, Room 4176, Washington, DC 20410-5000. **Do not send completed HUD 424-B forms to this address.** This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. The Department of Housing and Urban Development is authorized to collect this information under the authority cited in the Notice of Funding Opportunity for this grant program. The information collected provides assurances and certifications for legal requirements related to the administration of this grant program. HUD will use this information to ensure compliance of its grantees. This information is required to obtain the benefit sought in the grant program. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552).

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**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:**

08/01/2025

**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:**

Lucas

**\* State:** OH: Ohio

**Province:**

**\* Country:** USA: UNITED STATES

**\* Zip / Postal Code:** 43604-2209

**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:**

U.S. 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:**

34th 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.

Add Attachment

Delete Attachment

View Attachment

### 17. Proposed Project:

\* a. Start Date:

\* b. End Date:

### 18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,965,724.17"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="128,340.65"/>
* g. TOTAL	<input type="text" value="2,094,064.82"/>

### \* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

### \* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 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: 2/28/2027

**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. 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: [Insert below the Name and title of the Authorized Representative, name of Organization and the date of signature]:

\*Authorized Representative Name:

Wade Kapszukiewicz

\*Title: Mayor, City of Toledo

\*Applicant/Recipient 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

Wade Kapszukiewicz

\* Date: (mm/dd/yyyy): X

07/09/2025

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**Public Reporting Burden Statement:** The public reporting burden for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7<sup>th</sup> St SW, Room 4176, Washington, DC 20410-5000. **Do not send completed HUD 424-B forms to this address.** This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. The Department of Housing and Urban Development is authorized to collect this information under the authority cited in the Notice of Funding Opportunity for this grant program. The information collected provides assurances and certifications for legal requirements related to the administration of this grant program. HUD will use this information to ensure compliance of its grantees. This information is required to obtain the benefit sought in the grant program. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552).

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**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:**

08/01/2025

**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:**

Lucas

**\* State:** OH: Ohio

**Province:**

**\* Country:** USA: UNITED STATES

**\* Zip / Postal Code:** 43604-2209

**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:** rosalyne.clemens@toledo.oh.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. 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:**

39th 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.

Add Attachment

Delete Attachment

View Attachment

### 17. Proposed Project:

\* a. Start Date:

\* b. End Date:

### 18. Estimated Funding (\$):

* a. Federal	<input type="text" value="627,043.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="627,043.00"/>

### \* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

### \* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 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:

x 

\* Date Signed: x

**Applicant and Recipient  
Assurances and Certifications**

U.S. Department of Housing  
and Urban Development

OMB Number: 2501-0044  
Expiration Date: 2/28/2027

**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. 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: [Insert below the Name and title of the Authorized Representative, name of Organization and the date of signature]:

\*Authorized Representative Name:

Wade Kapszukiewicz

\*Title: Mayor, City of Toledo

\*Applicant/Recipient 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: (mm/dd/yyyy): X

07/09/2025

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## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

x Wade Kapszyk  
Signature of Authorized Official

x 7-9-25  
Date

x Mayor  
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, 2025 – June 30, 2026 [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 Kopylov  
Signature of Authorized Official

x 7-9-25  
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 Kapsulien  
Signature of Authorized Official

x 7-9-25  
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 Kapsulieny  
Signature of Authorized Official

x 7-9-25  
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.

# **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 2025 Program Year (July 1, 2025 - June 30, 2026).

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

<b><u>Programs/Activities</u></b>	<b><u>Available Funding</u></b>
Housing Preservation	\$ 750,000
Public Service	\$ 750,000
Neighborhood Revitalization Strategy Areas (NRSAs)	<u>\$1,500,000</u>
<b>TOTAL:</b>	<b>\$3,000,000</b>

**Eligible applicants:** 501(c)3 organizations, other nonprofits, government agencies, certified Community Based Development Organizations (CBDOs), for-profits (for Economic Development activities only).

**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. The available funds are approximately **\$640,000**.

### **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.

<b><u>Projects</u></b>	<b><u>Available Funding</u></b>
Construction/Rehabilitation of Homebuyer Units (non-CHDO)	\$500,000
Construction/Rehabilitation of Homebuyer Units (CHDO)	\$350,000

**TO APPLY FOR FUNDING, APPLICANTS MUST ATTEND THE MANDATORY APPLICATION MEETINGS BELOW:**

### **Community Development Block Grant (CDBG)**

*(for Non-Homeless Service Providers)*

Thursday, January 9, 2025

9:00 a.m. - 11:00 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)*

Thursday, January 9, 2025

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 22, 2025, 10:00 a.m. - 2:00 p.m.  
Department of Housing and Community Development  
One Government Center, Suite 1800  
Downtown Toledo, Jackson & Erie Streets

**NOTE:** The applicant's CDBG application must be completed prior to the open office session on Wednesday, January 22, 2025.

**CDBG Application Zoom Training**

Thursday, January 23, 2025, 9:00 a.m. - 11:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/85122124380>

**ESG Application Zoom Training**

Thursday, January 23, 2025, 1:00 p.m. - 3:00 p.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/88017825128>

**HOME NOFA Workshop**

Friday, January 24, 2025, 1:00 p.m. – 3:00 p.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/87530514192>

**THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS  
FRIDAY, FEBRUARY 7, 2025 AT 4:45 P.M.**

**THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS  
FRIDAY, FEBRUARY 7, 2025 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](mailto:monica.brown@toledo.oh.gov)

**FOR HOME:** For additional information, please contact Steven Powell, Housing Manager, at [steven.powell@toledo.oh.gov](mailto: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](https://toledo.oh.gov/ada).

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Zoom Link: [https://toledo-oh-gov.](https://toledo-oh-gov.zoom.us/j/85122124380)

[zoom.us/j/85122124380](https://toledo-oh-gov.zoom.us/j/85122124380)

ESG Application Zoom Training

Thursday, January 23, 2025,

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

Zoom Link: [https://toledo-oh-gov.](https://toledo-oh-gov.zoom.us/j/88017825128)

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HOME NOFA Workshop

Friday, January 24, 2025,

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

Zoom Link: [https://toledo-oh-gov.](https://toledo-oh-gov.zoom.us/j/87530514192)

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**THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS**

**FRIDAY, FEBRUARY 7, 2025 AT 4:45 P.M.**

**THE DEADLINE FOR SUBMITTING THE**

**HOME APPLICATION IS**

**FRIDAY, FEBRUARY 7, 2025 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](mailto:monica.brown@toledo.oh.gov)

**FOR HOME:** For additional information, please contact Steven Powell, Housing Manager, at [steven.powell@toledo.oh.gov](mailto:steven.powell@toledo.oh.gov)

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# The Sojourner's Truth

## CLASSIFIEDS

November 13, 2024

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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 2025 Program Year (July 1, 2025 - June 30, 2026).

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

Programs/Activities	Available Funding
Housing Preservation	\$ 750,000
Public Service	\$ 750,000
Neighborhood Revitalization Strategy Areas (NRSAs)	\$1,500,000
TOTAL:	\$3,000,000

Eligible applicants: 501(c)3 organizations, other nonprofits, government agencies, and certified Community Based Development Organizations (CBDOs), for-profits (for Economic Development activities only).

**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. The available funds are approximately \$640,000.

**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	Available Funding
Construction/Rehabilitation of Homebuyer Units (non-CHDO)	\$500,000
Construction/Rehabilitation of Homebuyer Units (CHDO)	\$350,000

**TO APPLY FOR FUNDING, APPLICANTS MUST ATTEND THE MANDATORY APPLICATION MEETINGS BELOW:**

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

Thursday, January 9, 2025  
9:00 a.m. - 11:00 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)*

Thursday, January 9, 2025  
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 22, 2025, 10:00 a.m. - 2:00 p.m.  
Department of Housing and Community Development  
One Government Center, Suite 1800  
Downtown Toledo, Jackson & Erie Streets

**NOTE:** The applicant's CDBG application must be completed prior to the open office session on Wednesday, January 22, 2025.

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**FOR HOME:** For additional information, please contact Steven Powell, Housing Manager, at [steven.powell@toledo.oh.gov](mailto:steven.powell@toledo.oh.gov)

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**PUBLIC NOTICE**

**2025-2029 FIVE-YEAR CONSOLIDATED PLAN  
2025-2026 ONE-YEAR ACTION PLAN**

To all interested agencies, groups, and persons:

The City of Toledo is seeking comments on the Draft 2025-2029 Five-Year Consolidated Plan, which includes the 2025-2026 One-Year Action Plan and the Analysis of Impediments. The 2025-2029 Five-Year Consolidated Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before June 20, 2025. The Consolidated Plan will be the basis over a five-year period for the allocation of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Neighborhood Stabilization Program (NSP) funds within the City of Toledo. These federal funds are allocated to the City of Toledo by HUD and may be utilized for public facilities improvements, removal of slum and blight, public services, housing-related projects, removal of architectural barriers, and economic development. Projects must generally benefit low- and moderate-income persons.

The 2025-2029 Five-Year Consolidated Plan and 2025-2026 One-Year Action Plan include a description of the federal funds anticipated to be received, other resources expected to be available within the City of Toledo for the 2025-2026 program year, and a description of the goals expected to be undertaken to meet the priority needs of the community as identified in the Consolidated Plan Citizens Participation Process. Also included in the Consolidated Plan is the Analysis of Impediments, which is a comprehensive review of barriers in the community that inhibit citizens from acquiring the housing of their choice and results in the development and implementation of a Five-Year 2025-2029 Fair Housing Plan.

The Draft 2025-2029 Five-Year Consolidated Plan, Draft 2025-2026 One-Year Action Plan, and Draft Analysis of Impediments will be available for review beginning **Wednesday, April 23, 2025**, on the website of the following entities:

Department of Housing and Community Development  
One Government Center, 18<sup>th</sup> 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](http://www.lucasmha.org)

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

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

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

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**Thursday, April 3, 2025, 5:30 p.m.**  
**City Council Chambers, 1<sup>st</sup> Floor**  
**One Government Center, Toledo, OH 43604**

**Thursday, April 24, 2025, 5:30 p.m.**  
**City Council Chambers, 1<sup>st</sup> Floor**  
**One Government Center, Toledo, OH 43604**

**Thursday, May 1, 2025, 5:30 p.m.**  
**City Council Chambers, 1<sup>st</sup> Floor**  
**One Government Center, Toledo, OH 43604**

The City of Toledo will also receive comments from the public in writing beginning **Wednesday, April 23, 2025**, through **Friday, May 23, 2025**, at the following address:

CITY OF TOLEDO  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
2025-2029 FIVE-YEAR CONSOLIDATED PLAN  
ONE GOVERNMENT CENTER, SUITE 1800  
TOLEDO, OHIO 43604

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Downtown Toledo, Jackson & Erie St.  
website: <https://toledo.oh.gov/government/mayor>

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#664861

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## Brown, Monica

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**From:** Thorpe, Susan  
**Sent:** Tuesday, April 1, 2025 9:47 AM  
**To:** 'aebbert@cherrystreetmission.org'; 'afitzgerald@ablelaw.org'; 'aforeman@mobilemeals.org'; 'annebauman@compassionhealthtoledo.org'; 'anneruch@gmail.com'; 'antduran8213@gmail.com'; 'areid@ctwtoledo.org'; 'ArringtL@co.lucas.oh.us'; 'believecenter@gmail.com'; 'Bill Trout'; 'Calvin Sweeney'; 'cbuckley@csmm.org'; 'chsweeney@arttatumzone.org'; 'cwilson@preferred-properties.org'; 'dgray@nwtoledo.org'; 'dhawkins@toledofhc.org'; 'dseeger@nhainc.org'; 'dsteele@pathwaytoledo.org'; 'emcpartland@mvhabitat.org'; 'eod.sqacc@gmail.com'; 'es\_maverick@hotmail.com'; 'frankt@co.lucas.oh.us'; 'gcommu8708@bex.net'; 'gthomas@toledofhc.org'; 'hzeller@lucasmha.org'; 'jacksonv@co.lucas.oh.us'; 'janellematson@compassionhealthtoledo.org'; 'janeltate@gmail.com'; 'janet@connectingkidstomeals.org'; 'jb\_sqacc@yahoo.com'; 'jjarrett@theartscommission.org'; 'jmueller@pathwaytoledo.org'; 'joliepn@preferred-properties.org'; 'kachinger@mvhabitat.org'; 'kbaroudi@co.lucas.oh.us'; 'kclark@pathwaytoledo.org'; 'LEGAL AID OF WESTERN OHIO, INC.'; 'Ischoen@lucasmha.org'; 'lsmigielski@theartscommission.org'; 'mebadik1956@gmail.com'; 'mfolk@theartscommission.org'; 'mike.andersonhsi@gmail.com'; 'mindy@seagatefoodbank.org'; 'mjacomet@nwtoledo.org'; 'MLK KITCHEN FOR THE POOR, INC'; 'mlk.kitchen@att.net'; 'msachs@nwtoledo.org'; 'nancy.elzinga@gmail.com'; 'NEIGHBORHOOD HEALTH ASSOCIATION, IN'; 'pageelaine1@aol.com'; 'rjordan@pathwaytoledo.org'; 'rshields@nhainc.org'; 'rstone@ablelaw.org'; 'sbowen@mobilemeals.org'; 'scrabtree@ablelaw.org'; 'sdouglas@nhainc.org'; 'stokest@co.lucas.oh.us'; 'tawls@lucashsc.org'; 'tbouyack@nhainc.org'; 'tfriedberg@ctwtoledo.org'; 'TOLEDO SEAGATE'; 'tpence@lawolaw.org'; 'trish@seagatefoodbank.org'; 'vhill@lucasmha.org'; 'vmartinez@lawolaw.org'; 'vriccardi7@aol.com'; 'wbarrow@pathwaytoledo.org'; 'Welch,David'; 'wendi@connectingkidstomeals.org'; 'NEIGHBORWORKS TOLEDO REGION'; 'yvonne.dubielak@toledogrows.org'; 'abdul.hamadeh@unitedwaytoledo.org'; 'associatedirector@familyhousetoledo.org'; 'DeniseF@auroraprojectinc.org'; 'executivedirector@familyhousetoledo.org'; 'grantwriter@spcc-toledo.org'; 'jembree@tlchb.org'; 'jhabib@spcc-toledo.org'; 'jirwin@spcc-toledo.org'; 'jjacobs@lfhtoledo.org'; 'jseibel@lfhtoledo.org'; 'lpengov@tlchb.org'; 'lwatson@cherrystreetmission.org'; 'matt.morris@unitedwaytoledo.org'; 'mburda@lfhtoledo.org'; 'michaelj@auroraprojectinc.org'; 'rpetroff@lfhtoledo.org'; 'jcordella@historicsouth.org'; 'wendy.pesttrue@unitedwaytoledo.org'; 'Lisa Lewis'; 'smanns@lucasmha.org'; 'jmontague@cherrystreetmission.org'; 'general.sqacc@gmail.com'; 'Melissa Cassidy'; 'cathy@believecenterinc.com'; 'Morgan Thomas'; 'cshackelford@lucasmha.org'; 'johnnyhorn1974@gmail.com'; 'akuntz@tlchb.org'; 'Claudia Witkowski'; 'Rachel Gagnon'; 'sarah.ryley@toledogrows.org'; 'csavage@pathwaytoledo.org'; 'nreno@nwtoledo.org'; 'bgreen@nwtoledo.org'; 'cwagner@historicsouth.org'; 'DeSteno, Sandra'; 'development@familyhousetoledo.org'; 'cdenton@spcc-toledo.org'; 'gardens.sqacc@gmail.com'; 'mapplegate@spcc-toledo.org'  
**Cc:** Brown, Monica; Knighten, Drenda  
**Subject:** Draft 2025-2029 Five-Year Consolidated Plan Public Hearings  
**Attachments:** 2025-2029 ConPlan PublicNotice-.doc  
**Importance:** High

Good morning,

The City of Toledo, Department of Housing and Community Development has scheduled three (3) public hearings on the Draft 2025-2029 Five-Year Consolidated Plan, which includes the 2025-2026 One-Year Action Plan and the Analysis of Impediments. The 2025-2029 Five-Year

Consolidated Plan will be the basis over a five-year period for the allocation of federal funding, including Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships (HOME) Program.

The 2025-2029 Five-Year Consolidated Plan and 2025-2026 One-Year Action Plan include a description of the federal funds anticipated to be received, other resources expected to be available within the City of Toledo, and a description of the goals expected to be undertaken to meet the priority needs of the community.

The Analysis of Impediments is a comprehensive review of barriers in the community that inhibit citizens from acquiring the housing of their choice and results in the development and implementation of a Five-Year 2025-2029 Fair Housing Plan.

**Public hearings on the 2025-2029 Five-Year Consolidated Plan are scheduled as follows. We are encouraging residents, stakeholders, and community members to attend these hearings and provide comment:**

- Thursday, April 3, 2025, 5:30 p.m.  
City Council Chambers, 1<sup>st</sup> Floor  
One Government Center, Toledo, OH 43604
- Thursday, April 24, 2025, 5:30 p.m.  
City Council Chambers, 1<sup>st</sup> Floor  
One Government Center, Toledo, OH 43604
- Thursday, May 1, 2025, 5:30 p.m.  
City Council Chambers, 1<sup>st</sup> Floor  
One Government Center, Toledo, OH 43604

The Draft 2025-2029 Five-Year Consolidated Plan, Draft 2025-2026 One-Year Action Plan, and Draft Analysis of Impediments will be available for public review starting **Wednesday, April 23, 2025**. The City of Toledo welcomes public comments in writing from **Wednesday, April 23, 2025**, through **Friday, May 23, 2025**. **Your feedback is crucial in the shaping of the final plans.**

Please see the attached public notice for further details.

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

**Visit us at:** [www.toledo.oh.gov](http://www.toledo.oh.gov)

**PUBLIC NOTICE**

**2025-2029 FIVE-YEAR CONSOLIDATED PLAN  
2025-2026 ONE-YEAR ACTION PLAN**

To all interested agencies, groups, and persons:

The City of Toledo is seeking comments on the Draft 2025-2029 Five-Year Consolidated Plan, which includes the 2025-2026 One-Year Action Plan and the Analysis of Impediments. The 2025-2029 Five-Year Consolidated Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before June 20, 2025. The Consolidated Plan will be the basis over a five-year period for the allocation of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Neighborhood Stabilization Program (NSP) funds within the City of Toledo. These federal funds are allocated to the City of Toledo by HUD and may be utilized for public facilities improvements, removal of slum and blight, public services, housing-related projects, removal of architectural barriers, and economic development. Projects must generally benefit low- and moderate-income persons.

The 2025-2029 Five-Year Consolidated Plan and 2025-2026 One-Year Action Plan include a description of the federal funds anticipated to be received, other resources expected to be available within the City of Toledo for the 2025-2026 program year, and a description of the goals expected to be undertaken to meet the priority needs of the community as identified in the Consolidated Plan Citizens Participation Process. Also included in the Consolidated Plan is the Analysis of Impediments, which is a comprehensive review of barriers in the community that inhibit citizens from acquiring the housing of their choice and results in the development and implementation of a Five-Year 2025-2029 Fair Housing Plan.

The Draft 2025-2029 Five-Year Consolidated Plan, Draft 2025-2026 One-Year Action Plan, and Draft Analysis of Impediments will be available for review beginning **Wednesday, April 23, 2025**, on the website of the following entities:

Department of Housing and Community Development  
One Government Center, 18<sup>th</sup> 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](http://www.lucasmha.org)

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

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

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

Toledo-Lucas County Public Library  
325 Michigan Street  
Toledo, Ohio 43604  
website: [www.toledolibrary.org](http://www.toledolibrary.org)

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

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

Public Hearings on the Draft 2025-2029 Five-Year Consolidated Plan are scheduled as follows:

**Thursday, April 3, 2025, 5:30 p.m.**  
**City Council Chambers, 1<sup>st</sup> Floor**  
**One Government Center, Toledo, OH 43604**

**Thursday, April 24, 2025, 5:30 p.m.**  
**City Council Chambers, 1<sup>st</sup> Floor**  
**One Government Center, Toledo, OH 43604**

**Thursday, May 1, 2025, 5:30 p.m.**  
**City Council Chambers, 1<sup>st</sup> Floor**  
**One Government Center, Toledo, OH 43604**

The City of Toledo will also receive comments from the public in writing beginning **Wednesday, April 23, 2025**, through **Friday, May 23, 2025**, at the following address:

CITY OF TOLEDO  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
2025-2029 FIVE-YEAR CONSOLIDATED PLAN  
ONE GOVERNMENT CENTER, SUITE 1800  
TOLEDO, OHIO 43604

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



**Brown, Monica**

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**From:** Rachel Hart <rachel.hart@toledo.oh.gov>  
**Sent:** Monday, March 31, 2025 3:10 PM  
**To:** Brown, Monica  
**Subject:** For Release: City Seeks Comments on Draft Five-Year Consolidated Plan

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# News Release

## Media Contact

Rachel Hart: 419-344-2353

March 31, 2025

The City of Toledo is seeking comments on the **Draft 2025-2029 Five-Year Consolidated Plan**, which includes the **2025-2026 One-Year Action Plan** and the **Analysis of Impediments**.

The 2025-2029 Five-Year Consolidated Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before June 20, 2025. The Consolidated Plan will be the basis over a five-year period for the allocation of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Neighborhood Stabilization Program (NSP) funds within the City of Toledo. These federal funds are allocated to the City of Toledo by HUD and may be utilized for public

facilities improvements, removal of slum and blight, public services, housing-related projects, removal of architectural barriers, and economic development. Projects must generally benefit low- and moderate-income persons.

The 2025-2029 Five-Year Consolidated Plan and 2025-2026 One-Year Action Plan include a description of the federal funds anticipated to be received, other resources expected to be available within the City of Toledo for the 2025-2026 program year, and a description of the goals expected to be undertaken to meet the priority needs of the community as identified in the Consolidated Plan Citizens Participation Process. Also included in the Consolidated Plan is the Analysis of Impediments, which is a comprehensive review of barriers in the community that inhibit citizens from acquiring the housing of their choice and results in the development and implementation of a Five-Year 2025-2029 Fair Housing Plan.

## **Public Hearings**

### **Thursday, April 3, 2025, 5:30 p.m.**

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

### **Thursday, April 24, 2025, 5:30 p.m.**

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

### **Thursday, May 1, 2025, 5:30 p.m.**

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

## **Additional Feedback**

The Draft 2025-2029 Five-Year Consolidated Plan, Draft 2025-2026 One-Year Action Plan, and Draft Analysis of Impediments will be **available for review online beginning Wednesday, April 23, 2025.**

The City of Toledo will also receive comments from the public in writing beginning Wednesday, April 23, 2025, through Friday, May 23, 2025, at the following address:

City of Toledo Department of Housing and Community Development  
2025-2029 Five-Year Consolidated Plan  
One Government Center, Suite 1800  
Toledo, Ohio 43604

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###



One Government Center, Toledo, OH 43604

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# Provide Feedback on the Draft 2025-2029 Five-Year Consolidated Plan



Monday, March 31, 2025

The City of Toledo is seeking comments on the **Draft 2025-2029 Five-Year Consolidated Plan**, which includes the **2025-2026 One-Year Action Plan** and the **Analysis of Impediments**.

The 2025-2029 Five-Year Consolidated Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before June 20, 2025. The Consolidated Plan will be the basis over a five-year period for the allocation of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Neighborhood Stabilization Program (NSP) funds within the City of Toledo. These federal funds are allocated to the City of Toledo by HUD and may be utilized for public facilities improvements, removal of slum and blight, public services, housing-related projects, removal of

architectural barriers, and economic development. Projects must generally benefit low- and moderate-income persons.

The 2025-2029 Five-Year Consolidated Plan and 2025-2026 One-Year Action Plan include a description of the federal funds anticipated to be received, other resources expected to be available within the City of Toledo for the 2025-2026 program year, and a description of the goals expected to be undertaken to meet the priority needs of the community as identified in the Consolidated Plan Citizens Participation Process. Also included in the Consolidated Plan is the Analysis of Impediments, which is a comprehensive review of barriers in the community that inhibit citizens from acquiring the housing of their choice and results in the development and implementation of a Five-Year 2025-2029 Fair Housing Plan.

## Public Hearings

### Thursday, April 3, 2025, 5:30 p.m.

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

### Thursday, April 24, 2025, 5:30 p.m.

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

### Thursday, May 1, 2025, 5:30 p.m.

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

The Draft 2025-2029 Five-Year Consolidated Plan, Draft 2025-2026 One-Year Action Plan, and Draft Analysis of Impediments will be **available for review beginning Wednesday, April 23, 2025**, on the website of the following entities:

### Department of Housing and Community Development

One Government Center, 18th Floor  
Downtown Toledo, Jackson & Erie Streets  
[toledo.oh.gov/housing](https://toledo.oh.gov/housing)

### Lucas Metropolitan Housing

424 Jackson Street  
Toledo, Ohio 43604  
[lucasmha.org](https://lucasmha.org)



**Office of the Mayor Toledo**

One Government Center, 22nd Floor  
Downtown Toledo, Jackson & Erie Streets  
[toledo.oh.gov/mayor](https://toledo.oh.gov/mayor)

**Lucas County Homelessness Board**

1220 Madison Avenue  
Toledo, Ohio 43604  
[endinghomelessnessstoleado.org](https://endinghomelessnessstoleado.org)

**Clerk of Council**

One Government Center, 21st Floor  
Downtown Toledo, Jackson & Erie Streets  
[toledo.oh.gov/city-council](https://toledo.oh.gov/city-council)

**Toledo-Lucas County Public Library**

325 Michigan Street  
Toledo, Ohio 43604  
[toledolibrary.org](https://toledolibrary.org)

**The Fair Housing Center**

326 N. Erie Street  
Toledo, Ohio 43604  
[toledofhc.org](https://toledofhc.org)

**Lucas Co. Board of Developmental Disabilities**

1154 Larc Lane  
Toledo, Ohio 43614  
[lucasdd.org](https://lucasdd.org)

The City of Toledo will also receive comments from the public in writing beginning Wednesday, April 23 2025, through Friday, May 23, 2025, at the following address:

City of Toledo Department of Housing and Community  
Development  
2025-2029 Five-Year Consolidated Plan  
One Government Center, Suite 1800  
Toledo, Ohio 43604

The City of Toledo supports the provisions of the Americans with Disabilities Act. If you would like to request a reasonable accommodation, please contact the Office of Diversity and

Inclusion ADA coordinator at (419) 245-1198 or submit a request online at [toledo.oh.gov/ada](https://toledo.oh.gov/ada).



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One Government Center  
640 Jackson Street, Toledo, OH 43604



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**Brown, Monica**

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**From:** Rachel Hart <rachel.hart@toledo.oh.gov>  
**Sent:** Monday, December 9, 2024 10:45 AM  
**To:** Brown, Monica  
**Subject:** For Release: City of Toledo Begins Update of 5-Year Consolidated Plan; Announces Schedules of Community Input Meetings

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# News Release

## Media Contact

Rachel Hart: 419-344-2353

December 9, 2024

## **City of Toledo Begins Update of 5-Year Consolidated Plan; Announces Community Input Meetings**

TOLEDO, OH — The City of Toledo is updating its 5-Year Consolidated Plan, a roadmap guiding investments in housing, homelessness services, economic development, public infrastructure, and community programs from 2025 through 2029. This plan determines how the city allocates federal funding from programs such as the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG).

Residents are invited to participate in this planning process by attending one of several community input meetings or by completing a [15-minute survey](#) to share their feedback by January 31, 2025. The survey and schedule of community meetings can be found on the city's website at [toledo.oh.gov/consolidated-plan](https://toledo.oh.gov/consolidated-plan).

### **Upcoming Community Input Meetings:**

- **Monday, January 6 @ 6 p.m.**  
Lagrange Library, 3422 Lagrange St.
- **Tuesday, January 7 @ 6 p.m.**  
Believe Center, 1 Aurora L. Gonzalez Dr.
- **Wednesday, January 8 @ 6 p.m.**  
Mott Branch Library, 1010 Dorr St.
- **Thursday, January 9 @ 6 p.m.**  
East Toledo Family Center, 1020 Varland Ave.
- **Thursday, January 23 @ 6 p.m.**  
Virtual Teams Meeting: [bit.ly/ToledoVirtualMeeting](https://bit.ly/ToledoVirtualMeeting)

### **About the 5-Year Consolidated Plan**

The Consolidated Plan is a [federally required](#) strategy that assesses Toledo's needs for affordable housing, homelessness services, and community development. It establishes data-driven priorities and performance goals for projects and services that strengthen neighborhoods and enhance the quality of life for all residents.

### **About the Process**

The city will incorporate public feedback into a first draft, which will be released on March 25, 2025, for a 30-day comment period. Additional public hearings will be held in March and April before the final plan is submitted to Toledo City Council for approval. The approved plan must be submitted to the Department of Housing and Urban Development (HUD) on May 9, 2025.



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One Government Center, Toledo, OH 43604

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## Brown, Monica

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**From:** Thorpe, Susan  
**Sent:** Monday, November 18, 2024 10:26 AM  
**To:** 'kstr2002@gmail.com'; 'jennee318@hotmail.com'; info@besnxc.org; 'ashaw@besnxc.org'; 'elevatedhearts419@gmail.com'; 'tamekamcgee37@gmail.com'; 'sberry@geturlifellc.com'; 'ebony.robinson@greatergen.org'; 'hvcac419@gmail.com'; 'laurehammond@gmail.com'; 'justin.s.bays@gmail.com'; 'onestreetatatime419@gmail.com'; 'Fonda Royster'; 'sisters4unity419@gmail.com'; 'aviancehill@gmail.com'; 'jannellector@yahoo.com'; 'yogie14@gmail.com'; 'lincolnschoolcoalition@gmail.com'; 'Lilly Alexander'; Douglas, Thomas; 'soulcitybw@gmail.com'; 'beverly jackson'; 'Safety Nest'; 'Sierra Willis'; 'Lori Maier'; 'Robert Smith'; 'Jule Williams'; 'Nadia Maani'; 'Sidney O. Young'; Corder, Nina; 'claudia@samecafetoledo.org'; 'coachmilr22@aol.com'  
**Cc:** Brown, Monica; Knighten, Drenda; Marentette, Lydia  
**Subject:** PY-2025 CDBG/ESG/HOME Application Public Notice  
**Attachments:** PY2025 Application Public Notice-final-.docx  
**Importance:** High

Good morning,

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2025 Program Year (July 1, 2025 - June 30, 2026).

**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](mailto:susan.thorpe@toledo.oh.gov)*

**Visit us at:** [www.toledo.oh.gov](http://www.toledo.oh.gov)

## **PUBLIC NOTICE**

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2025 Program Year (July 1, 2025 - June 30, 2026).

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

<b><u>Programs/Activities</u></b>	<b><u>Available Funding</u></b>
Housing Preservation	\$ 750,000
Public Service	\$ 750,000
Neighborhood Revitalization Strategy Areas (NRSAs)	<b><u>\$1,500,000</u></b>
<b>TOTAL:</b>	<b><u>\$3,000,000</u></b>

**Eligible applicants:** 501(c)3 organizations, other nonprofits, government agencies, certified Community Based Development Organizations (CBDOs), for-profits (for Economic Development activities only).

**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. The available funds are approximately **\$640,000**.

### **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.

<b><u>Projects</u></b>	<b><u>Available Funding</u></b>
Construction/Rehabilitation of Homebuyer Units (non-CHDO)	\$500,000
Construction/Rehabilitation of Homebuyer Units (CHDO)	\$350,000

**TO APPLY FOR FUNDING, APPLICANTS MUST ATTEND THE MANDATORY APPLICATION MEETINGS BELOW:**

### **Community Development Block Grant (CDBG)**

*(for Non-Homeless Service Providers)*

Thursday, January 9, 2025

9:00 a.m. - 11:00 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)*

Thursday, January 9, 2025

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 22, 2025, 10:00 a.m. - 2:00 p.m.  
Department of Housing and Community Development  
One Government Center, Suite 1800  
Downtown Toledo, Jackson & Erie Streets

**NOTE:** The applicant's CDBG application must be completed prior to the open office session on Wednesday, January 22, 2025.

**CDBG Application Zoom Training**

Thursday, January 23, 2025, 9:00 a.m. - 11:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/85122124380>

**ESG Application Zoom Training**

Thursday, January 23, 2025, 1:00 p.m. - 3:00 p.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/88017825128>

**HOME NOFA Workshop**

Friday, January 24, 2025, 1:00 p.m. – 3:00 p.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/87530514192>

**THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS  
FRIDAY, FEBRUARY 7, 2025 AT 4:45 P.M.**

**THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS  
FRIDAY, FEBRUARY 7, 2025 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](mailto:monica.brown@toledo.oh.gov)

**FOR HOME:** For additional information, please contact Steven Powell, Housing Manager, at [steven.powell@toledo.oh.gov](mailto: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 2025 Program Year (July 1, 2025 - June 30, 2026).

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

<b><u>Programs/Activities</u></b>	<b><u>Available Funding</u></b>
Housing Preservation	\$ 750,000
Public Service	\$ 750,000
Neighborhood Revitalization Strategy Areas (NRSAs)	<b><u>\$1,500,000</u></b>
<b>TOTAL:</b>	<b><u>\$3,000,000</u></b>

**Eligible applicants:** 501(c)3 organizations, other nonprofits, government agencies, certified Community Based Development Organizations (CBDOs), for-profits (for Economic Development activities only).

**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. The available funds are approximately **\$640,000**.

### **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.

<b><u>Projects</u></b>	<b><u>Available Funding</u></b>
Construction/Rehabilitation of Homebuyer Units (non-CHDO)	\$500,000
Construction/Rehabilitation of Homebuyer Units (CHDO)	\$350,000

**TO APPLY FOR FUNDING, APPLICANTS MUST ATTEND THE MANDATORY APPLICATION MEETINGS BELOW:**

### **Community Development Block Grant (CDBG)**

*(for Non-Homeless Service Providers)*

Thursday, January 9, 2025

9:00 a.m. - 11:00 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)*

Thursday, January 9, 2025

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 22, 2025, 10:00 a.m. - 2:00 p.m.  
Department of Housing and Community Development  
One Government Center, Suite 1800  
Downtown Toledo, Jackson & Erie Streets

**NOTE:** The applicant's CDBG application must be completed prior to the open office session on Wednesday, January 22, 2025.

**CDBG Application Zoom Training**

Thursday, January 23, 2025, 9:00 a.m. - 11:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/85122124380>

**ESG Application Zoom Training**

Thursday, January 23, 2025, 1:00 p.m. - 3:00 p.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/88017825128>

**HOME NOFA Workshop**

Friday, January 24, 2025, 1:00 p.m. – 3:00 p.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/87530514192>

**THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS  
FRIDAY, FEBRUARY 7, 2025 AT 4:45 P.M.**

**THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS  
FRIDAY, FEBRUARY 7, 2025 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](mailto:monica.brown@toledo.oh.gov)

**FOR HOME:** For additional information, please contact Steven Powell, Housing Manager, at [steven.powell@toledo.oh.gov](mailto:steven.powell@toledo.oh.gov)

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## Brown, Monica

---

**From:** Thorpe, Susan  
**Sent:** Monday, November 18, 2024 10:23 AM  
**To:** 'aebbert@cherrystreetmission.org'; 'afitzgerald@ablelaw.org';  
'aforeman@mobilemeals.org'; 'annebauman@compassionhealthtoledo.org';  
'anneruch@gmail.com'; 'antdurand8213@gmail.com'; 'areid@ctwtoledo.org';  
'ArringtL@co.lucas.oh.us'; 'believecenter@gmail.com'; 'Bill Trout';  
'brendah\_etsac@yahoo.com'; 'Calvin Sweeney'; 'cbuckley@csmm.org';  
'chsweeney@arttatumzone.org'; 'cwilson@preferred-properties.org';  
'dgray@nwtoledo.org'; 'dhawkins@toledofhc.org'; 'dliedel@theartscommission.org';  
'dseeger@nhainc.org'; 'dsteele@pathwaytoledo.org'; EAST TOLEDO FAMILY CENTER;  
'emcpartland@mvhabitat.org'; 'eod.sqacc@gmail.com'; 'es\_maverick@hotmail.com';  
'frankt@co.lucas.oh.us'; 'gcommu8708@bex.net'; 'gthomas@toledofhc.org';  
'hzeller@lucasmha.org'; 'jacksonv@co.lucas.oh.us';  
'janellematson@compassionhealthtoledo.org'; 'janeltate@gmail.com';  
'janet@connectingkidstomeals.org'; 'jb\_sqacc@yahoo.com';  
'jjarrett@theartscommission.org'; 'jmueller@pathwaytoledo.org'; 'jodig@etfc.org';  
'joliepn@preferred-properties.org'; 'kachinger@mvhabitat.org';  
'kbaroudi@co.lucas.oh.us'; 'kclark@pathwaytoledo.org'; LEGAL AID OF WESTERN OHIO,  
INC.; 'lschoen@lucasmha.org'; 'lsmigielski@theartscommission.org'; 'mebadik1956  
@gmail.com'; 'mfolk@theartscommission.org'; 'mike.andersonhsi@gmail.com';  
'mindy@seagatefoodbank.org'; 'mjacommet@nwtoledo.org'; MLK KITCHEN FOR THE  
POOR, INC; 'mlk.kitchen@att.net'; 'msachs@nwtoledo.org'; 'nancy.elzinga@gmail.com';  
NEIGHBORHOOD HEALTH ASSOCIATION, IN; 'pageelaine1@aol.com';  
'rjordan@pathwaytoledo.org'; 'rshields@nhainc.org'; 'rstone@ablelaw.org';  
'sbowen@mobilemeals.org'; 'scrabtree@ablelaw.org'; 'sdouglas@nhainc.org';  
'spiller@cherrystreetmission.org'; 'stokest@co.lucas.oh.us'; 'tawls@lucashsc.org';  
'tbouyack@nhainc.org'; 'tfriedberg@ctwtoledo.org'; TOLEDO SEAGATE;  
'tpence@lawolaw.org'; 'trish@seagatefoodbank.org'; 'vhill@lucasmha.org';  
'vmartinez@lawolaw.org'; 'vriccardi7@aol.com'; 'wbarrow@pathwaytoledo.org';  
Welch, David; 'wendi@connectingkidstomeals.org'; NEIGHBORWORKS TOLEDO REGION;  
'yvonne.dubielak@toledogrows.org'; 'abdul.hamadeh@unitedwaytoledo.org';  
'associatedirector@familyhousetoledo.org'; 'DeniseF@auroraprojectinc.org';  
'executivedirector@familyhousetoledo.org'; 'grantwriter@spcc-toledo.org';  
'jembree@tlchb.org'; 'jhabib@spcc-toledo.org'; 'jirwin@spcc-toledo.org';  
'jjacobs@lfhtoledo.org'; 'jseibel@lfhtoledo.org'; 'lpengov@tlchb.org';  
'lwatson@cherrystreetmission.org'; 'matt.morris@unitedwaytoledo.org';  
'mburda@lfhtoledo.org'; 'michaelj@auroraprojectinc.org'; 'mkravetsky@tlchb.org';  
'rpetroff@lfhtoledo.org'; 'jcordella@historicsouth.org';  
'wendy.pesttrue@unitedwaytoledo.org'; 'Lisa Lewis'; 'smanns@lucasmha.org';  
'montague@cherrystreetmission.org'; 'chrystalr@etfc.org'; 'general.sqacc@gmail.com';  
'Melissa Cassidy'; 'jbancroft@lucasmha.org'; 'cathy@believecenterinc.com'; 'Morgan  
Thomas'; 'cshackelford@lucasmha.org'; 'johnnyhorn1974@gmail.com'  
**Cc:** Brown, Monica; Knighten, Drenda; Marentette, Lydia  
**Subject:** PY-2025 CDBG/ESG/HOME Application Public Notice  
**Attachments:** PY2025 Application Public Notice-final-.docx  
**Importance:** High

Good morning,

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2025 Program Year (July 1, 2025 - June 30, 2026).

**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](mailto:susan.thorpe@toledo.oh.gov)*

**Visit us at:** [www.toledo.oh.gov](http://www.toledo.oh.gov)

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<b>TOTAL:</b>	<b><u>\$3,000,000</u></b>

**Eligible applicants:** 501(c)3 organizations, other nonprofits, government agencies, certified Community Based Development Organizations (CBDOs), for-profits (for Economic Development activities only).

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<b><u>Project Components</u></b>
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Emergency Shelter (ES)
Rapid-Rehousing (RRH)
Permanent Supportive Housing (PSH)
Transitional Housing (TH)

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<b><u>Projects</u></b>	<b><u>Available Funding</u></b>
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Construction/Rehabilitation of Homebuyer Units (CHDO)	\$350,000

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Large Glass Community Room

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Toledo, OH 43604

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Toledo, OH 43604

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One Government Center, Suite 1800  
Downtown Toledo, Jackson & Erie Streets

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Thursday, January 23, 2025, 9:00 a.m. - 11:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/85122124380>

**ESG Application Zoom Training**

Thursday, January 23, 2025, 1:00 p.m. - 3:00 p.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/88017825128>

**HOME NOFA Workshop**

Friday, January 24, 2025, 1:00 p.m. – 3:00 p.m.

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

📅 Tuesday, November 19, 2024

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 2025 Program Year beginning July 1, 2025 and ending June 30, 2026.

### Community Development Block Grants

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

Housing Preservation - \$750,000

Public Service - \$750,000

Neighborhood Revitalization Strategy Areas – \$1,500,000

**Total: \$3,000,000**

501(c)3 organizations, other nonprofits, government agencies, certified Community Based Development Organizations (CBDOs), for-profits (for Economic Development activities only) are eligible to apply.

**Note:** Special consideration will be given to public service and new construction activities in the Neighborhood Revitalization Strategy Areas when implemented by a Department of Housing and Community Development certified Community Based Development Organization.

### **Mandatory Application Meeting for CDBG Non-Homeless Service Providers**

**When:** January 9, 9 – 11 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 22, 10 a.m. – 2 p.m.

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

### **CDBG Application Training Session**

**When:** January 23, 9 – 11 a.m.

**Where:** [Zoom](#)

**Applications must be submitted via Zoomgrants by 4:45 p.m. on February 7, 2025.**

For more info, contact [monica.brown@toledo.oh.gov](mailto:monica.brown@toledo.oh.gov)

### **Emergency Solutions Grants**

Emergency Solutions and Community Development Block Grant applications from Homeless Service providers are considered with funding prioritized for the following project components:



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

**Total: approximately \$640,000**

### **Mandatory Application Meeting for ESG Homeless Service Providers**

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

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

### **ESG Application Training Session**

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

**Where:** [Zoom](#)

**Applications must be submitted via Zoomgrants by 4:45 p.m. on February 7, 2025.**

For more info, contact [monica.brown@toledo.oh.gov](mailto:monica.brown@toledo.oh.gov)

### **HOME Investment Partnership Program**

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

#### **Funding available:**

Construction/Rehabilitation of Homebuyer Units (non CHDO) - \$500,000

Construction/Rehabilitation of Homebuyer Units (CHDO) - \$350,000

**Total: \$850,000**

### **HOME Application Training**

**When:** January 24, 1 - 3 p.m.

**Where:** [Zoom](#)

**Applications must be submitted via Zoomgrants by 4:45 p.m. on February 7, 2025.**

For more info, contact [steven.powell@toledo.oh.gov](mailto:steven.powell@toledo.oh.gov)

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## **1<sup>st</sup> PUBLIC HEARING SUMMARY**

### **DRAFT 2025-2029 FIVE-YEAR CONSOLIDATED PLAN**

**Thursday, April 3, 2025, 5:30 p.m.**

A public notice was posted on 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, 1<sup>st</sup> 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 eight people in attendance at the public hearing.

**Rosalyn Clemens:** Welcome to the first public hearing on the city of Toledo's 2025-2029 Consolidated Plan. My name is Rosalyn Clemens and I am the Director of the City of Toledo's Department of Housing and Community Development. I'm joined this evening by several people who are going to introduce themselves. I just want to say that this is a process that we have to go through as an entitlement community that receives U.S. Department of Housing and Urban Development's (HUD) housing and community development funds. Every five years, we have to develop a plan and this is a plan that is crafted by looking at our needs for housing and community development, looking at our demographic and market trends, and engaging our community to set priorities. The plan informs what we're going to do over a five-year period with those federal funds and it's really a critical time for us to get community support. I want to say that federal housing and community development funds constitute probably 97% of what this city spends.

For housing and community development work it's our bread and butter. These federal dollars are our bread and butter and it's critical that we put a plan together that truly informs HUD and reflects our needs for this funding. The work to develop this plan is being done by a consulting firm, CEW Advisors, who was selected on a competitive basis and has been engaging and conducting several community meetings in different parts of the city to give all residents the opportunity to participate, and we've had a very robust participation. We've also had some online surveys that we've asked the citizens to fill out.

With that, we're going to introduce ourselves and then Brian Hull, who's the principal of CEW Advisory Consultants, will present our preliminary findings on the Consolidated Plan process. Monica, if you would start off.

**Monica Brown:** Monica Brown, Community Planning and Development Grants Manager for the Department of Housing and Community Development.

**Brian Hull:** Hello, my name is Brian Hull. I'm the president of CEW Advisors.

**George Thomas:** I'm George Thomas. I'm the CEO and General Counsel for The Fair Housing Center and I'll be separately presenting on the Analysis of Impediments to Fair Housing Choice.

**Brian Hull:** Excellent, so there will be two separate conversations going on this evening. I'm going to be focusing specifically on a lot of the information that we have gathered so far for the Consolidated Plan, and then when I'm sort of wrapped up, we're going to kick it over to George for him to review the entire process and the outline of the Analysis of Impediments to Fair Housing Choice. So, I have a brief agenda for the work that I'm going to be doing, for the discussion I'm going to be having here. We're going to review what the Consolidated Plan process is, why it's required, and we'll go into some information about the elements of the Consolidated Plan, but primarily what I really wanted to focus on, to Director Clemens point, the information that we've collected so far that really makes up the fact base for the community needs, which then drives the actual goals and strategies of the plan. So, I want to talk through what we've uncovered so far and how we got there, and then we'll be talking a little bit about the expected resources that the city will be receiving over the next five years.

A critical component of this is to really identify what the needs are in the community so that the city can best determine how to invest those funds based on the needs of the community. So, we want to have a conversation around what resources the city is expected to get and then we'll talk a little bit about the next steps. There will be an opportunity for two additional public hearings, there will be an opportunity to review

the entire Consolidated Plan when it's published later this month, and there will be an opportunity for individuals to give testimony here – verbal or written testimony for public comments.

With that, a Consolidated Plan, to simplify, is a very comprehensive strategic planning document and it is required. The city of Toledo is an entitlement community and it receives funds through HUD. There are three different sources of funds that the city receives – Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG). I'll talk a little more about them in a bit. The framework is really about addressing the housing and community development needs and the homelessness needs in the city.

The Consolidated Plan really helps target the resources that the city receives in a thoughtful way to accomplish specific goals that are articulated in the plan that are rooted in the needs of the community. A lot of the work that we've done involves conversations with community residents, with neighborhood associations, with service agencies that are providing services to low- and moderate-income individuals, affordable housing developers, city staff, county staff, and state staff to really help build out that fact base of needs. The plan itself is for a five-year period of time that goes from July 1, 2025 through June 30, 2029.

There are six primary elements of the plan. I'll go through this pretty quickly so we can get into the meat of the needs assessment. The Executive Summary is just a high-level overview. The Process section is a discussion about the steps that were taken to compile and complete the Consolidated Plan. The Needs Assessment articulates the housing, homelessness, and community development needs in the community inclusive of public service needs, infrastructure improvement needs, and facility improvement needs that is rooted in a lot of data gathering and lots of conversations. The Market Analysis really looks at the trends in the housing market over time and what the current state of the housing market is. The Strategic Plan section is a clearly defined set of goals and priorities and the allocation of resources to meet specific community needs that were derived from the Needs Assessment and the Market Analysis.

The Annual Action Plan is the first-year plan of that five-year planning document. Each year, the city goes through an Action Plan process to really help ensure that the investments that it is undergoing are meeting the needs of the community. As part of the Needs Assessment, as part of the conversations about what the city looks like, what the most urgent needs are of the community, we did quite a bit of data research, data gathering, quite a bit of literature review of previous studies, planning documents, and surveys of other agencies. We looked at multiple data sources for American Community Survey, Comprehensive Housing Affordability Strategy, homelessness data from the HMIS system, economic data from the Bureau of Economic Analysis, and the Labor Department. A lot of that really helps drive the fact base that then allows us to validate information through consultation interviews and focus groups. These were with city staff, county staff, state agency staff, community-based organizations, neighborhood groups, neighborhood associations, housing developers, public service delivery agencies, the housing authority, and homelessness service providers. We had lots and lots of conversations with lots and lots of people.

The citizen participation process was organized through a series of community meetings in different neighborhoods of the city, as well as online community meetings and focus groups with clients and staff to really help understand what those specific needs are from people who are receiving services. We also had an online housing and community needs survey, which was open through February 15th, and we had 590 responses from people from all over the city. I want to just quickly go through the highlights of that. It can get very, very dense, so I'm going to be very focused on these few key research findings and this is specifically for the public data research that we were doing focusing on population trends, the housing size, number of housing units, cost burden, and then the condition of the units. Just quickly, the population is about 260,000. I'm sure everyone is pretty aware the population of Toledo has been declining for the past 55 years. It's lost about one-third of its population over those 55 years. There are about 118,000 households and about 133,000 housing units.

The racial composition of the city is about 60% White; 28% Black, African-American. The other sort of larger groups would be individuals of one or more races, and you have very small populations for American Indian, Alaskan Natives, Asian households, and Native Hawaiians. Regarding ethnicity, you have a small, about 35%, non-Hispanic population of other races. You have the predominant ethnicity, White; non-Hispanic, about 57%; and you have about 9% Hispanic or Latino population in the city. This is sort of a rearticulation of the

population decline, and it's been going down for a long time, and that's something that the city is really making efforts to change. When we break out the actual composition of age brackets, what we see is, even though the population is declining, you have one population group that is increasing pretty dramatically and that is the age group of early seniors between 65 and 74 years old. That population has grown about 50% over the past 14 years. That actually means a lot for the housing market given that is the population group that's growing. The only population group that's growing in the city is that population group, and then every other population group is either stagnant or declining, and the largest decrease is your youth population, decreasing about 14%.

That will also impact school enrollments, school facilities, and after-school program needs. When we look at the household size, owner households are slightly larger than renter households at 2.27. Median size renters are at 2.14. You're looking at two-person households primarily in the city. The largest increase of households are single-person households that grew 11.5% over the 14-year period of 2010 to 2023, and your largest decrease are larger households of three-person households. Four-person households are generally flat and two-person households are generally flat as well. One of the critical analyses that we do is a discussion about housing problems, and housing problems are defined by HUD in very, very particular ways. What we did was looked at the raw data, and then we compiled it based on individual households that are less than 100% of the area median, and then we broke it down by renter households versus owner households to just have a conversation around what these specific problems are.

Cost burden are households that are spending more than 30% of their income on housing. Now, that could be on rent or their mortgage, so when they say housing, it could be renter or owner. Almost 11,000 renters and about 6,500 homeowners are cost-burdened. Severely cost-burdened means that a household is spending more than 50% of their income on their housing expense, either rent or their mortgage and other costs. You have a little over 11,000 renters and a little over 5,000 owners that are severely cost-burdened. This is one of the most critical risks of homelessness.

Oftentimes, families cannot keep up with paying 50% or more of their income on housing. It just takes a small shock to really set them on a pathway to eviction or foreclosure. The other housing problems discussed by HUD are what's called overcrowding and severe overcrowding. That just means there's between one and one and a half people per room for overcrowding, or more than one and a half people per room for severely overcrowding. Given the scope of the challenges for cost burden, these are fairly minor problems in the city, but you're still looking at about 1,200 households that are overcrowded and about 500 households that are severely overcrowded. Substandard housing means; specifically, lack of plumbing or kitchen facilities and not just a temporary remodel, like a permanent lack of facilities. You have about 1,400 households that are in this situation. Then you have close to a little over 3,000 households that have zero or negative income. These oftentimes are households that are occupying affordable housing units, but we like to also call it out here.

When we look at the data, the sheer magnitude of the housing cost problem is the primary focus. We heard this repeatedly in most of the conversations that we're having, both through consultations with community agencies and the community meetings. When we dive into the data a little bit more regarding cost burden, we can apportion the cost burden based on your income level.

Among extremely low-income renters, and that is defined as rental households that are earning between zero and 30% of the area median, you see a significant, almost 70% of these households are severely cost-burdened. You also have quite a few that are just regular cost-burdened. As individual income goes up, the likelihood of being cost-burdened decreases, which makes perfect sense. It's not until you're a moderate-income or higher-income household that the cost burden virtually disappears. When we talk of cost burden, we see it pretty significantly throughout the city, but it's definitely impacting lower-income households to a much greater degree than higher-income households.

It also impacts renter households to a much higher degree than owner households. The other component about the age of the housing stock is the issue of lead hazard risks. This is most challenging for households that have children under the age of six, but you have a fair number of households throughout the entire city that have a lead hazard risk. We define that as houses built before 1980. It was 1978 when the EPA outlawed lead-based paint for homes – 1980 is the threshold that's used.

You have a significant number of homes that have lead – 85,000, give or take, with no children present. It's oftentimes an issue with children ingesting lead because they're chewing on the windowsills or things like that. Oftentimes, if there's lead in the home, but it's occupied solely by adults, it's not as serious of a concern. Among the lead hazard risks, there's almost 15,000 housing units that were built before 1980 and that are occupied by children younger than six years old. The city has a lead grant and has been doing lead hazard remediation work for 30 years. The city has seen a pretty dramatic decline in childhood lead poisoning over that time.

Again, just to highlight the risks, there is a significant issue of blighted property and vacant property throughout the city. This is predicated by the significant population decline. There are about 11.6% vacant properties in the city according to the most recent community survey data. The city has been pretty rigorous in blight remediation and demolition of blighted properties to try to shrink down that vacancy rate. Vacancies can be categorized in a couple different ways. Oftentimes, there's a temporary vacancy, which is a unit that's not occupied, but it's actively for rent or for sale, or has been sold or has been leased, but the occupants haven't moved in. Then there's this other category of other vacant, which could imply that they are dilapidated or blighted properties.

They don't really clarify specifically, but there's probably close to, given that there's 113,000 housing units, you're probably looking at about 13,000, 14,000, 15,000 vacant units in the city. A significant portion of those are considered other vacant, which could also mean dilapidated or blighted properties. That is a lot, and that was the public data that really helped us have conversations with people. When we were going through all these consultations, these conversations, there were key themes that kept coming to the top. Affordable housing was the main priority and universally true, but some other key themes were the growth of homelessness in the city and the need for additional public services, as well as infrastructure improvements regarding streets, sidewalks, flood hazards, facility improvements for public buildings, and then economic development needs. We'll get into those types in a bit. We're just going to go quickly through those one at a time.

For the affordable housing need, it was ranked as the most important need for the city in virtually every single conversation that we've had. The public data truly backs all that up. It's needed everywhere and for everyone, which is a daunting thing to think about. Additional rental and home-ownership opportunities; down-payment assistance programs; construction of new housing for sale; demolition and clearance of blighted properties; supportive housing for seniors and individuals with disabilities; special needs housing for veterans, victims of domestic violence, individuals with severe mental illness, these kinds of special needs populations; and then a significant need for homeowner housing rehabilitation.

The homelessness need percolated up quite a bit. It was a priority need based on our data analysis, the growth of homelessness over time. Consultations with the community agencies we met with, and the neighborhood focus groups that we've had. Homelessness has increased about 33% over the past four years. It's estimated that there were almost 3,400 homeless individuals throughout the city and for the calendar year of 2024. Homelessness is starting to impact people who have never suffered from homelessness before. That is significantly driven by the pretty significant increase in rents. You have a lot of high-risk groups including seniors; individuals who are severely cost-burdened, as we mentioned before; youth that are aging out of the foster care system; and then single parents. But then there is also what has been traditionally known, or historically known, as the working poor who used to be able to afford their rent with one or more low-wage jobs, but that's no longer possible. So, you're seeing more individuals like that falling into homelessness. The need for public services is pretty significant.

The city commits its full 15% allocation amount each year to public services. Through our conversations with the community, community-based organizations, and the interviews that we've done and the online needs assessment, these are some of the key priorities – crime prevention and affordable child care, so that way families can actually work, is a huge need; afterschool summer programs; health care and mental health services; individual services for seniors and folks with disabilities; victims of domestic violence; adult education; workforce training programs tied to economic development needs; financial literacy programs; and once again, programs and services for homeless individuals and families. There was a discussion about streets and sidewalks, road improvements, stormwater management, and flooding. So, we had several conversations

with city staff, looked at the city's land-use plan, hazard mitigation plan, the online survey results, and one of the things that came to the top was the need for better pedestrian walkways for people.

There's aging infrastructure that needs to be repaired, primarily in and around the downtown area, including sewer and stormwater management; catch basins; better accessibility, such as better curb cuts for individuals with disabilities; and then, obviously, just safer streets for non-automobile commuters including pedestrians, cyclists, and public transit riders. Then there's this key theme about green infrastructure and environmental sustainability, if and when roads are being updated, to kind of think about those sustainability issues.

Public facility improvements are a pretty big category and could mean a lot of different things. It could be public buildings, it could mean the actual community agencies that are serving individuals, but also just additional assets in the community. So, we heard quite a bit in certain neighborhoods, such as the lack of access to healthy food options, grocery stores, as well as the need for improvements at some public buildings and school buildings.

There is also a need for additional community centers, or senior centers, and child care facilities. Again, the topic of affordable programs for youth kept coming up, along with the need for adequate and high-quality health care and mental health care facilities, in addition to the need for public parks and recreation facilities throughout the city.

Economic development was a key theme from several of our community meetings, from the online research, and then through consultation with city staff. The city has been doing a lot and has been receiving accolades for the level of investments that have been coming into the city recently. So, the city is actively working on these things, and kudos to them.

But some of the key priorities, again, were economic development, retention and expansion of existing businesses, attraction of new businesses, workforce training programs, a focus on higher wage and livable wage jobs, improvements to commercial spaces, and incentives for small businesses to start up, and a paid apprentice program; specifically for individuals, youth, and high school graduates getting into specific types of fields. So, there's a lot there and a lot that these funds can do, but there is a lot of need and the unfortunate reality is the need always outweighs the resources that are available. Over the next five years, the city is expected to receive about \$47.3 million in the three types of grant categories. Community Development Block Grant (CDBG) is the most all-inclusive of the funds.

You can do a lot of things with CDBG funds including housing and infrastructure improvements, economic development programs, facility improvements, and public services. It's the largest grant that the city receives annually and they expect to get about \$7.1 million next year.

The Home Investment Partnerships Program (HOME) is dedicated for affordable housing, either development, rehabilitation, new construction, rental assistance, or the homeowner rehab program. All of these can fit into the HOME program. About \$1.9 million is expected next year, and about \$9.2 million over the next five years.

Emergency Solutions Grant (ESG) is dedicated funding for individuals and families at risk or currently homeless and it funds emergency shelters, transitional housing, and homelessness services. The city receives about \$650,000 a year and is expected to get a little under \$3.3 million over the next five years.

There's a lot of information and all of it helps to identify the goals and outcomes that the city is going to try to accomplish and achieve over the next five years with the limited amount of resources it receives.

The draft Consolidated Plan will be made available on the 23<sup>rd</sup>. It will be posted online to this website. There will be communication forthcoming from the city about how to access that document. It's going to be a fairly large, lengthy, dense document. I encourage everyone to at least read the Executive Summary, which is a great summary of the needs, resources, and the projects and things.

There'll be a 30-day public comment period from April 23<sup>rd</sup> to May 23<sup>rd</sup>. There'll be two additional public hearings held in this room on Thursday, April 24<sup>th</sup> at 5:30 p.m., and then Thursday, May 1<sup>st</sup> at 5:30 p.m. During tonight's meeting and those meetings, you can offer verbal testimony.

You can also provide written testimony. Any public comment that we receive is evaluated, reviewed, responded to, and incorporated into the final Consolidated Plan and then that Consolidated Plan gets submitted to HUD, and that is the roadmap for the city for the next five years. There are two ways to submit written public comments. Again, verbal comments are always available.

You can send an email to the Department of Housing and Community Development at <https://toledo.oh.gov/departments/housing-community-development>. You can also send a letter. If people want to write this information down, you can write that information down.

You can send in any public comments as you wish related to any of this. And then, obviously, there'll be more opportunities to submit written comments once the draft plan is available for review. Any and all public comments need to be received no later than May 23<sup>rd</sup>.

So, you've got a little over a month and a half. Thank you. With that, I will kick it over to George or Rosalyn.

**Director Clemens:** Thank you, Brian. I think we'll hold all of the questions to the end. So, Mr. Thomas, you can go ahead with your presentation.

**George Thomas:** I'm George Thomas, CEO and General Counsel for The Fair Housing Center. So, the basic outline for my presentation is I'll talk a little bit about The Fair Housing Center just so you're aware of what we are and what fair housing actually is, and then we'll head into the report that we did, which is the Analysis of Impediments to Fair Housing Choice (AI), which runs along the same timeline as the Consolidated Plan but is actually separate. The AI is an additional requirement, as Brian was explaining, that needs to be done by the city because it's an entitlement jurisdiction and receives funding from HUD.

So, just quickly about The Fair Housing Center. We are a separate nonprofit founded in 1975. This year is our 50<sup>th</sup> anniversary. We are not the City of Toledo, but a 501(c)3 nonprofit that does fair housing work in the area, and we've been doing it for a very long time working to create inclusive communities of opportunity fighting housing discrimination. One of the things I always try to emphasize is we're focused on housing equity and getting access to housing for everyone because where you live powerfully impacts every aspect of your life including your job opportunities, education, transportation, health, and safety. The fair housing laws that our agency enforces ensures that every person can find a home regardless of one of the federally recognized protected classes including race, color, national origin, sex, religion, familial status, disability, military status, sexual orientation, and gender identity – the latter two now recognized under the provision of sex. Locally, we also recognize source of income and immigration status.

I kind of highlighted those here because the AI that we perform, which I'm going to explain a little bit more because we think about barriers to fair housing choice and impediments in our area that specifically affect people based on those different categories. So, since we were founded, we have always been one of the most progressive and effective proponents of fair housing laws all across the country. Early after the passage of the Fair Housing Act, there were a lot of questions about how that law should work and how it could be enforced to the courts.

Our local Fair Housing Center, especially at that time period when that law was still new, handled a lot of the most significant cases nationwide in developing fair housing law all across the country. So, we handled, for example, the first sexual harassment case in housing, as well as some of the first insurance cases – insurance discrimination and access to homeownership insurance. We have handled more than 13,500 complaints and very often we receive settlements from those complaints. And we've achieved more than \$35 million reinvested back into the community to try to address and repair that harm of housing discrimination in our area. Our services are free for Lucas and Wood County residents.

So, if you, or anyone is a victim of housing discrimination, you can refer them to us. The easiest way is our website at [www.toledofhc.org](http://www.toledofhc.org), or you can call (419) 243-6163. I'm going to go through these slides kind of quickly, but we do have five main points of service. The last one is research and policy advocacy, which brings us to the AI, which I'll be talking about.



So, we do quite a few information referral services. We provide people with educational information and complete more than 2,000 intakes every year assisting victims of housing discrimination. That's the backbone of what we do. We meet with clients, educate them on their rights, investigate, gather information, and file cases with the Ohio Civil Rights Commission or in court. We provide education and outreach on those issues so residents understand their rights. Some of those trainings are technical in nature. We want people to understand fair housing laws down to the most technical aspects, but some of what we do, too, is just creating a more welcoming community, trying to change hearts and minds in our area to build that more welcoming, diverse community that we want to see. That includes, for example, our Ode to the Zip Code Poetry Contest, which is actually coming up on April 14<sup>th</sup>. We do that on 419 Day every year.

We also have a Housing Conditions program. Housing Conditions and Neighborhood Reinvestment is actually the full title of that, where we help tenants with housing conditions issues. We focus that program particularly on historically disinvested, or historically redlined areas where the housing conditions and blight tend to be the most significant because of the perpetuation of disinvestment, which I'll talk about a little bit more. We also help tenants stabilize their housing. There are many positive externalities from that program, including uplifting those community areas where we focus that work. As Brian talked about, there are a lot of housing conditions issues in our area. This is one of the few programs that fills a gap in services that actually works directly with tenants to work on those kinds of issues.

That leads us to the fifth part of what we do, which is research and policy advocacy. We actually do a good amount of this every year. Examples include an eviction study – the University of St. Louis Urban Affairs Center, which uncovered the rate of evictions but also who were the top evictors in our area, and delving into the potential defenses that tenants had in those eviction cases. Those are the kind of housing issues that we study. Perhaps the most significant is this AI that we'll be talking about today. Before we jump into what the AI is, I just want to make sure everyone is understanding the background here, what this is trying to actually accomplish in the law.

If you go back in time to the time period of the passage of the Fair Housing Act, which was 1968, there's a civil rights movement and a push for this kind of... some people see it as sort of the pinnacle of the civil rights movement of achieving this access to equal opportunity in housing. But the advocates for the Fair Housing Act understood that an important part of the solution was punishing, or discrimination when you could uncover it. Sure, we have civil rights laws that will... if you can prove discrimination, then we're able to sue someone or pursue claims against the person who had committed the discrimination. But merely reacting to discrimination will never be the full solution.

We really need to take progressive, proactive steps to try to accomplish some of the goals of the Fair Housing Act, the goals that they had identified, and the real purpose of the Fair Housing Act, which is to build this more welcoming community where the gears of our economy and our systems of access to housing can all function correctly by both removing discrimination and also removing barriers to fair housing choice for everyone. So, the law actually itself contains a requirement that recipients of federal funds must affirmatively further the goals of the Fair Housing Act. That's the actual quote for the language that's in the law.

The way that HUD has interpreted that then is to require entities like the City of Toledo that receive CDBG funds, or HOME funds, to then conduct a study of the barriers to fair housing choice in their area and then take those proactive, or those affirmative steps to further those goals of the Fair Housing Act. I'm going to show you a couple times in the history of redlining in our area just to kind of give you the framework to understand the idea of removing barriers to fair housing choice in your area.

Just to explain this really quick if you're not familiar with it, this is from 1938 and this is the Homeowners Loan Corporation redlining map that covered the City of Toledo. The red areas were designated as high risk, whether for insurance, for capital, or for loans, for example, for home loans to be going to those areas. Yellow was more of a moderate risk, and then blue and green were lower risk.

To kind of orient you on this map, the blue river going through is the Maumee and that large green area to the left of the map is Ottawa Hills. You can see in the central city neighborhoods at this time period of 1938 were designated as red and those zones were designated, those different color categories, for a number of reasons, but, in particular, one was explicitly based on racial categories and determinations about the racial

demographics of those areas effectively cutting off capital investment and perpetuating disinvestment in those areas.

It's important to remember, though, that a lot of times when I talk about redlining, there's a familiarity with that basic concept or maybe people have seen these maps at some point, but it's really important to remember that it was beyond just the Homeowners Loan Corporation redlining maps. There were other efforts where this occurred that are now kind of forgotten or hidden in different ways and, Richard Rothstein, in *The Color of Loss*, is the refusal of federal agencies to issue mortgages to those neighborhoods in the 1930's and 40's. That's only one of many policies that were filed, but doesn't entirely determine today's landscape. There are many other policies that get ignored that are equally important. This is just one example from Ottawa Hills that I give – this is a direct text from a restrictive covenant that covered the area of almost all of Ottawa Hills. This is the area for the plat, or this is Bancroft and Secor, this very first plat that created Ottawa Hills. A lot of people have forgotten or don't realize that the way that Ottawa Hills was developed at that time immediately included racially restrictive covenants in that area, so not everyone could access those explicitly based on race and those actually covered most of the Ottawa Hills area.

It's whenever I talk about this, too, that I always try to emphasize it's really important to remember this is actually not that long ago in terms of human development or generations. It's really just the prior generation of folks that lived in our community that planned out these neighborhoods and instilled those kinds of covenants that we see, for example, Ottawa Hills. You see that even now with the racial demographics of our area which still tend to be highly segregated. I'm just giving you some of those statistics now as compared to the county-wide population. Just using Ottawa Hills is only one example – not trying to pick on them necessarily, but it's a good example of how that functioned specifically in our area. There have been and there continues to be powerful long-term implications of that. This includes a variety of different issues including health-care access, lower health quality in those areas that were historically redlined or disinvested, and educational opportunities that are different. There are risks of and effects of climate change, which are different in those same areas that were historically disinvested. This is part of a perpetuation of disinvestment where areas were viewed as lower value so it's harder to show an appraisal of a home, for example, it tends to be lower in those same areas that were historically disinvested.

There's also just a lack of capital investments ongoing in those areas, and there's more difficulty accessing those credit opportunities that are really important. I'm just showing this map one more time before I turn to the next map to show you a correlation here. What I've gathered here are FDIC-insured bank branches, which are like the largest banks in our area, so think of it like Fifth Third, Huntington, PNC, those kinds of bigger banks. Those are typically FDIC-insured banks, specifically, and going back to 1994 and then comparing that to 2022, we see that the red dots on the map are bank branches that have been just lost over time and there are no new bank branches. The green dots represent bank branches that existed as of 2022, so if you kind of look at, for example, if you're familiar enough with the Toledo area, that central city neighborhood of, let's say, Junction/Englewood – there's one green dot in the Old South End there, but if you were a resident living in that area you would have to travel quite some distance to be able to get to one of the FDIC-insured banks. Now that does not include credit unions, such as the Toledo Urban Federal Credit Union, but I highlight FDIC-insured banks because they are subject to the Community Reinvestment Act which is another part of one of the tools that we need to think about as we're trying to uncover disinvestment and reverse that with reinvestment in those areas.

I'm just going to go through these really quickly, but this is Home Mortgage Disclosure Act data which shows where home loans were actually originated by some of the largest banks in our area. By largest, I'm measuring that by deposit share, in other words, how many deposits in this area do these banks have? Huntington, for example, you see those extensive tracks that are shaded. The darkest shaded areas had the most home loans and the areas that have no shading at all did not have home loans in that particular year that I pulled this data for, which is 2022. The dark purple or bluish purple on the far left there, that's the area of Ottawa Hills. You can see that there is a larger number of home loans issued there, and in the central city neighborhoods, you see in that year, there were very few home loans and those are the same areas that you saw on the prior map that were historically redlined and disinvested. This is the Fifth Third's Home Mortgage Disclosure Act data. It shows not exactly the same pattern but a very similar kind of pattern where you have these higher lending levels, higher level number of home mortgage originations in the outlying areas and less so in those central city neighborhoods, again, that were subject to disinvestment. This is, again, a KeyBank similar theme and

what I'm hitting on here – I'm trying to help everyone understand the background and the importance of this rule under the Fair Housing Act and why this is an important part of what we need to do locally, and these trends do correlate with that red lining map that I showed earlier.

Some of the health outcomes – this is from research elsewhere nationwide, that areas that were disinvested now, to this day, have lower life expectancy, increased prevalence of poor mental health, and higher incidence of chronic disease. It puts folks at higher risk for poor outcomes from COVID-19, as just one example, increased incidence of a wide range of adverse health outcomes from preterm birth to late stage cancer. There's also a lower level of access to healthy food which is also something that Brian had mentioned in his presentation about how that was really important to some residents, in particular, those areas that are food desert areas also correlate to those same maps that I was showing earlier, as well as access to health care and outdoor and green spaces. I'm showing you now a report from the Kirwan Institute at Ohio State University. These are just highlighting, at least for the particular time period, that they looked at lead poisoning incidents, or children with elevated blood lead levels. Those, again, were in those same core central city neighborhoods.

There's a higher prevalence of elevated blood lead levels, and to understand how that's functioning, if there's disinvestment in those neighborhood areas, if there's less capital in those areas, the housing stock becomes more likely to be deteriorated and old lead paint that had been painted on many years ago is more likely to peel, turn to dust, and now become a poisoning hazard for those same children. Compare that to the Old Orchard or Ottawa Hills' area, for example, that have very low levels of lead poisoning incidents even though the housing stock there is quite old, so it's not just a function of having old housing, it's a combination of old housing and also disinvestment in those areas. Child asthma incidence, which is actually from a study that I conducted with Mercy Health, the Pulmonary Clinic at St. V's that specifically treats child asthma incidents, and we found a heavy concentration of child asthma incidents in those same neighborhood areas that I've been highlighting as areas that need that reinvestment, and we see those barriers to fair housing choice in those same areas as well. This is a little bit more difficult to look at, to see these images just because of the size of the PowerPoint, but these are incidents of water access terminations, so terminations of water services recorded by the city of Toledo. This is actually just before the pandemic, but for a lengthy period of time showing the access to water services.

The studies have actually shown that schools and school districts located in areas that receive a "D" grade from those home owners' loan corporation maps have less district per pupil total revenues, less diverse student populations, and worse average test scores. In fact, the last little piece of this is that flooding, extreme heat, and air pollution are also more common. Part of that is there's just more asphalt, or concrete space, and less green space in those same areas. So, I highlight all those facts and that history and how that history led up to where we're at now to try to highlight that because I don't want the AI process to be done in a vacuum or without an understanding of the history that led us to this point of why these issues are so important, what they're about, and it's so critical to remove these barriers of fair housing choice so that people can live in the communities that they want with the resources located in that same community, or that they can have access to other neighborhood areas that they feel might be better for their families. That's what the AI is about, that's what we're trying to uncover with this kind of analysis, so although we do examine a lot of the same demographic information that Brian looked at, we look at it through a very different lens, and we're kind of looking for different things and different trends of how this history and how these issues are now affecting all of those different protected classes that I had listed earlier in the presentation.

We began with a community outreach. We conducted surveys and focus groups, we conducted focus groups at three different libraries, we advertised for those widely, and we conducted surveys as well as summarized all of that in the AI report, which is actually already available on our website but the city will also publish and make available. We also reviewed local history and demographic trends that draw on census data and other studies. For this AI, I'm really pleased to be able to provide a number of additional studies. It's far beyond just the census data. We had, over the last five years since the previous AI, worked with Bowling Green State University on a number of different studies on these kinds of issues in the Toledo area and then we linked to those additional studies in the AI, which each of them kind of take a deep dive on different issues. For example, one of the studies covers screening from housing based on criminal history, another study looks at discrimination against voucher holders, and another study looked at ongoing trends in the real estate market.

We often work to identify barriers to fair housing choice. Part of that process, too, is looking at the previous AI and seeing where we were at, of what barriers we identified five years ago, and the status of work to resolve those barriers, so there was a piece of that and that also helps inform, along with the focus groups and reviewing local data and studies, to help us see what barriers we should identify in this study. Finally, we provide an action plan which is designed to eliminate or alleviate the identified barriers. One thing I should really highlight here, too, is that, we talk about this in much more detail in the AI document, but in the prior AI, this community actually did make quite a bit of progress on a number of the different issues that we had identified there. Toledo City Council and the Administration, as well, really did work on a number of the issues that we had identified, so we're proud to see the things that The Fair Housing Center, or things that this community, through the AI, sought to change; that the city really did work on. We have suggested a focus on 14 different barrier areas with an action plan for each of those, but I'm not going to list those right here, but we are going to just touch on each of those briefly. By the way, these are not in any particular order. I think it's clear from Brian's analysis and ours that affordable housing is a really key important piece of solving barriers for housing choice in our area, so we don't put these in a particular order when we're listing these.

One of our key suggestions for addressing criminal history screening is to take advantage of a new CQH program, a Certified Qualified Housing Program, that was recently enacted. Criminal history screening occurs when someone's trying to apply for a housing unit and they're denied because of something in their criminal history. HUD has repeatedly studied this issue and there's been a variety of nationwide studies that uncover that screening based on history criminal history is far more likely to disparately harm Black and Latino residents than the rest of the population and sometimes housing providers were really using criminal history screening as a pretext for accomplishing other forms of discrimination. They would say, well, we won't allow anyone with a misdemeanor offense or any kind of criminal history to ever live here – if that ever occurred in the past 20 years, let's say, so in other words, that's a huge blanket ban based on any kind of criminal conduct that prohibited that person from living there. We actually have filed a number of fair housing cases on this basis and have been very successful, but what can we do proactively to address this issue? Well, in September of last year, Ohio's legislature passed a new rule that allows folks who may have a criminal history to go back to the court and ask for a certificate confirming that they can be qualified for housing. That's really important because what it says is that no future housing provider could ever be held liable if that person then committed a crime on the premises, which kind of removes any risk for the housing provider. In particular, what we suggest in the plan is that the community work on clinics or other activities to try to take advantage of that. ODRC, which is the state agency that will also be creating the regulations for this, has not created the form that will need to be used when folks apply to receive the CQH and it's because the law is so new that they haven't created the process yet, but as soon as that's created, that could be an important project.

We also identified access to home ownership as a really key important part of the local barriers to fair housing choice. I showed you earlier recent Home Mortgage Disclosure Act data that uncovers this inequitable access to home ownership opportunities and I think Brian touched on this too, but you know 10 or 20 years ago, the city's home ownership rate was much larger than it is today. We're reaching a point where we are not quite there yet, but almost a majority tenant community with many of the home ownership – many of those rental units are comprised of actually single-family homes which were originally built intended for home ownership and now a lot of the owners are actually out of state, or not local landlords who are kind of in an investor market and that tends to, in some neighborhood areas, effectively act as a way of extracting wealth from the area while the investor has a business plan of not completing repairs, and which then leads to more blight in those same areas – clearly a barrier to fair housing choice. So, some of the things we suggest are home ownership fairs to just educate the community. When we talk with folks, there's a lot of folks who just don't understand the potential for home ownership or how that could even save them money, or how it could build equity and pass on generational wealth. The city actually had the first home ownership fair, which was a huge success, last year and we're coordinating with the city again. I applaud them for doing that again this year.

We're incentivizing banks to increase access to home loans through better marketing product offerings. We often meet with banks and talk with them about their Community Reinvestment Act (CRA) obligations and what products they have. One thing we noticed, though, is they may have great products in theory, but they really need to market those and be out in the community offering those products, doing a better job to do that, and encourage them to better disclose their commitments to the Toledo area. One of the key issues we think is, maybe locally, is using that CRA and talking with banks about what they're actually doing with those CRA dollars in their area to better coordinate that towards increased home ownership. We also suggest that –

we'll explain this in a little bit more detail, I won't go too far into it here – but in the report, we talk about reviewing what kind of local laws we could change to accomplish some of those incentives for banks. We also suggest developing a program to help local residents with tangled title issues. So, what I mean by that is, it's an issue we often encounter where a resident is living in a home where their aunt or maybe grandma still has title, but grandma has since passed away, or auntie has since passed away, and the title was never properly transferred to the person who should have inherited the home, and that is really sad because it prevents that person from getting access to that generational wealth that could have been built through home ownership and also access to other programs like repair programs, or other services that could help that person if they were the title owner. So, one thing that other communities have done is create tangled title programs where they actually help residents with that issue or, perhaps even more importantly, help prevent that issue from happening with education and transactional legal work. We also suggest that the city undertake a more thorough analysis and study of available Home Mortgage Disclosure Act to more zero in on this trend. This is clearly a key issue for our area, so it's just something that needs to be studied more.

In the AI, we go through and do a deeper dive into the largest banks in our area and their lending patterns over a course of time and, again, it would be too much detail to go into now, but that was really only a short period of time that we looked at it and, the study, we suggest, should be deeper. Another key issue is accessible housing for persons with disabilities. This definitely came out in the focus groups and the survey, and it's really not surprising. It's a known issue in our area. We have a few suggestions for that, so, one, is to make sure there's enforcement of the existing state building code in Ohio. Ohio actually creates an additional requirement that's above and beyond what the federal law requires for accessibility. The federal law currently says that new housing built after March 1991 has to have accessible features, and it does not require anything for homes built prior to that or buildings constructed prior to that. However, the State Building Code says that if you are undertaking renovations to a building – if you're undertaking significant renovations, you have to build in accessibility when you do that. For example, let's say someone is renovating a warehouse downtown and turning it into apartments, well, when they do that, if the renovations are significant enough, it triggers accessibility requirements that should require accessible paths to the units and other feature changes as long as those are feasible within the existing structure, and we can make sure that our local building officials are reviewing that carefully and enforcing that.

The city also has what's called a Visitability Law. Most people don't know this, but if new homes are constructed, and this even includes single family houses, but if they're constructed with public dollars or your federal support, such as HOME funds or other funds, then they need to make sure that those buildings are constructed with a higher level of accessibility with visitability. That's really important because normally the federal requirements for accessibility only apply to multi-family homes, whereas Toledo's Visitability Law applies to single-family houses, so it ensures that if there's new construction of single-family houses with public dollars involved, then there's going to be this higher threshold of visitability. We also suggest building more accessible affordable housing which could include permanent supportive housing. One thing that came out in the HMIS data, which is the data that looks at homelessness in our area, is that we have seen a significant increase in the number of people who are chronically or long-term homeless, and so part of the solution for that, we suggest, is that they need more specialized housing opportunities that include services for the individuals that need that extra support in housing. Source of income discrimination continues to be a key issue in our area. This is one of those areas where there was some significant progress over the last five years, though, since the last AI, we identified source of income discrimination as a barrier, and then the city of Toledo did pass a law that prohibits source of income discrimination.

What that means is that, let's say, whatever your source of income to pay your rent or other pay for your housing, the housing provider cannot discriminate on that basis. So, let's say you use a housing choice voucher for your rent, the landlord cannot say, I'm sorry, I don't accept housing choice vouchers, or let's say you use social security disability to pay for your rent, the housing provider cannot deny you on that basis. The next step for this is enforcement of that law. A lot was already accomplished with the passage of that law. We have seen a lot of other housing providers now accepting vouchers that we're confident would not have previously, so it has had a very positive effect, but the next step is for the city to develop systems to receive complaints about that form of discrimination and act on those. We don't have any way to file those kinds of complaints federally or at the state level. Those will have to be handled by the municipality.

Separate from that but related is voucher mobility. Voucher mobility refers to policies and programs locally that will help housing choice voucher holders access neighborhoods of their choice. There's a lot of different things the public housing authority, or perhaps the city of Toledo in collaboration with the housing authority, can do to help with that. We don't have time here, but there's a number of best practices that will increase mobility for voucher holders to be able to access high-quality housing in the neighborhood of their choice. Land use and zoning is always a key issue. We suggest changing some local zoning codes related to restrictions, for example, group homes for persons with disabilities. We have made some very specific suggestions in that regard and we suggest that the city remove some of the barriers to development of group homes in our area. We also suggest adoption of local zoning restrictions on small box stores that tend to contribute to food deserts. We've also made some very specific recommendations for that and, in fact, later this month, City Council will be reviewing one of those projects which we had provided information for and supported the Planning Commission to study zoning restrictions for small box stores that make food deserts worse. We also suggest adopting local zoning laws that incentivize the development of healthy food providers, so it's not just restricting the dollar stores that contribute to food swamps, but also finding ways to increase access to healthy foods, and there's a lot of work going on in that space right now by the city.

We also suggest ensuring there are neighborhood plans that include resident involvement, and then when that happens – when residents come together to make suggestions for neighborhood plans, that the city also try to actually then adopt the appropriate zoning processes to move those plans forward to make sure that those are enforced by the local zoning officials. For the LGBTQ community, for that barrier, the key issue here is actually enforcement of the same chapter of the local law that covers source of income discrimination. This could be an increasing issue because the federal government, HUD, has pulled back from, or potentially may, I should say, pull back from enforcement of some of these protections, but the city of Toledo still has its local anti-discrimination law which it could implement. For homelessness and affordable housing, like I mentioned, this is a key issue, especially affordable housing, we suggest development of more affordable housing opportunities as a key priority.

We should include funding for services for residents and develop projects that specifically help the chronically homeless that need services to successfully remain housed, again, I'm just kind of highlighting that for those folks. If you've been homeless for some time, it's far more likely that you're going to need supportive services also built into those housing opportunities in order to be successful. There's kind of a newer development since the last AI which is that there have been some local laws that were adopted that make it more expensive, or more difficult or cumbersome to implement services like home repair services, whether it's new roofs or other kind of smaller repairs, and we're suggesting that the city try to find ways to speed up that process or remove those barriers to make it as easy as possible for residents who need home repairs and those kinds of services to access. That could be a key new development that we're suggesting, that the city remove that barrier as well, which is discussed in more detail in the report.

Again, another key issue which Brian mentioned and I mentioned a few times already, is substandard housing conditions. The city has had this loss of population over time and we also have very old housing stock. Blight and deterioration of that housing stock, especially for low-income residents, continues to be a really important issue. At the same time, investors and landlords come in to buy those very lower-cost housing stock and sometimes their business plan does not include renovations, or maintenance of that housing. We have a number of suggestions for that – one is to file the recommendations of a study that was conducted on local code enforcement efforts – there's a number of suggestions there which we link to in the AI. We also suggest programs that help the tenants, like I was mentioning, our housing conditions program, for example, and increase the budget and staffing for code enforcement. In the previous AI, this was another key area that we identified previously, which is that public transportation systems were really inadequate. They had artificial barriers based on where municipal boundary lines were and we really needed to switch to a county-wide system so that wherever you were living, especially if you're a resident in the city of Toledo, you could actually get to the job that you needed to go to or to the areas that you needed for your family. Since that last AI, the city did transition to a county-wide transportation system. It's based on a sales tax rather than on property taxes; however, we suggest that – part of the reason why there were a lot of people advocating for that change was to help the low-income families and the persons with disabilities who most relied on public transportation. We suggested that that really needs to be studied more about how we now make sure that this new transportation system is serving that purpose. Your housing opportunity could have very little value if

you don't have access to transportation to get to the places that you need. We also suggest that paratransit services for those persons with disabilities should be expanded to county-wide.

I'm going to touch on these last ones really briefly, but a lot of the issues that are reported to us through the studies, the focus groups, and what we've identified occur in rental housing and just regular fair housing services. Part of what The Fair Housing Center does continues to be a really key part of removing barriers to fair housing choice. Since the last AI, we previously identified access to water as a really important issue, and I'm not sure why this slide – it had some text cut off there, I'll repair that, I apologize – but then the city actually adopted a number of really important and helpful policy changes locally. One included, for example, that the city would not terminate water services where a tenant was living. Let's say, if an owner ordered water services to be terminated, the city would not follow through with that termination order unless and until the landlord proceeded with a full eviction action and let that person have their day in court before just shutting off water services, which could be really devastating and very unhealthy for the family trying to live without water services – that was a key issue. Another issue that's really important is the reselling of water services. This is an ever-increasing problem where the landlord tries to pass on the water bill to the tenant and the tenant often either doesn't have access to the water bill, or because they don't have access to the account, they don't qualify for income assistance programs that the city offers. There are actually some local rules about that, but the next phase is to make sure that those rules are actually enforced, and so we have recommendations about how to accomplish that.

The final thing that we talk about is public awareness. There is quite a bit of information about how the housing market is functioning and these various different barriers to fair housing choice, and the Fair Housing Act covers everything from zoning to the design and construction of housing all the way down to evictions and foreclosures from that housing, so making sure the public understands their rights under these laws is really important because they won't seek to enforce their rights if they don't have awareness. Another key part of that, too, is just the kind of efforts to change hearts and minds – different events and projects that can move our community to become a more welcoming area. That is it. Now, we actually already have the AI posted on our website and we've sent it out in our newsletter. It's my understanding that when the Consolidated Plan is distributed, the AI will also be distributed by the city and it describes in the document when and how to make public comments, but I would emphasize to you that, at any time, you can contact me, you can make comments here, contact The Fair Housing Center – we're more than happy to receive public comments from the community. Thank you.

**Director Clemens:** Thank you, George. Are there any questions or comments from members of the audience on the two presentations that have been put forth here this evening?

**Audience Member (*inaudible*):** Thank you all, that was really interesting. I look forward to looking through the Consolidated Plan, too.

**Audience Member:** I was just saying, thank you. I look forward to looking through the Consolidated Plan. I was curious, I noticed like the green storm water infrastructure, it was like down – is that like an order of priorities on that PowerPoint, or...?

**Brian Hull:** No, like George's, they were in no particular order. It was just kind of my stream of consciousness as I was organizing my thoughts in the PowerPoint.

**Audience Member:** Okay, thanks.

**Rosalyn Clemens:** Anybody else? So, if you have a presentation, you can also email your comments to [neighborhoods@toledo.oh.gov](mailto:neighborhoods@toledo.oh.gov), or you can mail your comments to the Department of Housing and Community Development. So, with that, this concludes our first public hearing on our 2025-2029 Consolidated Plan and 2025 Annual Action Plan. The next two meetings – the first meeting will be held on Thursday, April 24<sup>th</sup> at 5:30 p.m., and then on Thursday, May 1<sup>st</sup>, also at 5:30 p.m. here in the Council Chambers. Thank you for coming out this evening.

## **2<sup>nd</sup> PUBLIC HEARING SUMMARY**

### **DRAFT 2025-2029 FIVE-YEAR CONSOLIDATED PLAN**

**Thursday, April 24, 2025, 5:30 p.m.**

A public notice was posted on 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, 1<sup>st</sup> 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. We'll get started. We want to welcome you to the second public hearing for our 2025-2029 Consolidated Plan.

We have a couple of representatives here that will be speaking tonight. First, we have Brian Hull from CEW Advisors and he will be going over the process for the Consolidated Plan that was undertaken throughout this year. We also have with us George Thomas from The Fair Housing Center and he will talk a little bit about fair housing and the Analysis of Impediments, Senghor Manns from Lucas Metropolitan Housing who will talk a little bit about public housing, and Julie Embree from the Toledo Lucas County Homelessness Board who will talk about the homelessness initiative. My name is Monica Brown and I am the Grants Manager for the City of Toledo, Department of Housing and Community Development. I am going to turn it over to Brian.

**Brian Hull:** Thank you. Everyone can hear me okay? So, my name is Brian Hull and I am the President of CEW Advisors. We are the consulting firm that was spearheading the effort to develop the Consolidated Plan for the city of Toledo. The Consolidated Plan essentially is a five-year strategic plan for the utilization of federal funds through the U.S. Department of Housing and Urban Development (HUD). I'm going to go pretty quick through the agenda that I have because we have four different presentations.

So, my agenda, real quickly – we're going to briefly talk about the overview of the Consolidated Plan; talk about the analysis, the information that we've gathered, both from data gathering from consultations from community meetings, from discussions with program partners, and then we've identified a pretty core set of priority needs in the city. We'll talk briefly about the expected resources that the city is thinking it will receive, and then we'll talk a little bit about the next steps and the public comment period.

A Consolidated Plan – what is it? It's a five-year planning document. It's really thoughtful, really comprehensive, and really dense with lots of information about the needs of the community and these needs are identified through several different ways – through public data, research data, survey data through consultations with community agencies, and lots of community meetings that we've had throughout. It's a framework to really understand what the housing and community development needs are in the city, what the homelessness needs are, infrastructure needs, and it helps the city think through how it is going to allocate a very scarce amount of federal funds to really help move the needle on a pretty significant level of need. There's always so much more that needs to get done and not enough money to do it, so this planning process really helps the city be thoughtful about how to make those decisions and how to say no because that's what the strategic planning process is. You don't have enough to do everything, so what can you do. The period of time is from July 1, 2025, through June 30, 2030.

There are specific elements of the Consolidated Plan including the Executive Summary, which is just a summary that is very clear. The Process section really talks about what we did to collect this information and develop the plan. The Needs Assessment is where the meat really is, which is really kind of incredibly informative about all the issues and things that we've discovered. The Market Analysis examines what the current housing market trends are and gaps in housing as well, and the Strategic Plan section is really thoughtful about how you use your funds based on the needs and based on the existing housing market. The Annual Action Plan is the first year of the five-year strategic plan, and then every additional year will be another Annual Action Plan for the five years of the Consolidated Plan.

This is, again, I've mentioned it before, we did a pretty significant amount of literature review, data research, and analysis from dozens of copious sources, consultation interviews, focus groups, community meetings, and



an online survey. This really pulled together a lot of information that was our fact base for the Needs Assessment.

I'm going to go really quickly through some of the high-level data including population, housing size, housing units, and cost burden – this is the primary driver of a lot of the information – and then the condition of the housing units. So, briefly, the city of Toledo has about 268,000 residents, give or take. There has, you know, been a long-standing population decline for about 55 years in the city of Toledo.

There is about 118,000 households and 133,000 housing units. There are race and ethnicity breakdowns for the population as well. About 60% of the population is White, about 28% Black, African-American. There are small percentages of American Indian; Asian; Hawaiian Native; other races; and then two or more races, about 7.7%. Again, to mention really quickly, there has been a dramatic population decline for 55 years. This has been the driver of a lot of the vacancy, abandonment, and blight. The median age of the population is about 36 years old. Interestingly, even though the population is declining and has been declining for a very long time, your senior population is growing. So, this carries with it a lot of additional needs as people age, as people want to age in place, as people sort of have more cognitive decline and mobility challenges that come along with age. It really impacts the housing market and the need for additional types of units. That's something that we were thinking of. Your largest population decrease is your under-18 population, which is actually pretty similar to a lot of the other communities that we're working in. Your homeowners are slightly larger in terms of household size than your renters.

The largest increase in households over the course of 2010 -2023 were your single-person households, so a lot of people are interested in living alone. Your largest decrease in size of households are your three-person households. Your four-person households, four or more persons, are roughly stable over the course of these 13 years, but your smaller households are the ones that are growing, which also impacts the future housing market trends and the needs in the community.

When HUD looks at housing problems, they're looking at very, very specific things – cost-burden, which is a household paying more than 30% of their income on housing, either for their mortgage or their rent; a severe cost-burden, or households that are spending more than 50% of their income on their housing; and overcrowding and severely overcrowding, more than 1.5 people per room. Substandard housing can mean a lot of different things, but from HUD's perspective, it lacks complete plumbing and kitchen facilities. Among all those different housing problems that are analyzed by HUD, the dominant driver is housing cost-burden.

You can see the chart on the right. You have tens of thousands of households in the city that are spending more than 30% and more than 50% of their house income on housing. The severely cost-burdened households that are spending more than 50% of their income on housing are the most at risk of homelessness and, as rents continue to increase more and more in the city, that's correlated with an increase in homelessness in the city. When you disaggregate that by household income, you can see that the lower the income of the household, the more severely cost-burdened the household is, and for renters in the extremely low-income group, that's making between 0% and 30% of area median. The vast majority – two-thirds of that population group – almost three-quarters of that population group are severely cost-burdened, and then as your income rises, your cost-burden virtually disappears.

The other item that we were investigating was lead hazard risks. This is driven by the age of the housing. It was in 1978 when the EPA banned the use of lead paint in home construction, so what we typically do is evaluate housing that was built after 1980 because they weren't allowed to use lead paint in the homes. So, when we look at the total amount of housing in the city and we look at the lead risk, you have about three-quarters of the housing stock that has a lead risk that was built before 1980. You have almost 15,000 housing units that were built before 1980 that also have children present and this is the most dangerous aspect of childhood lead poisoning – houses that were built before 1980 with children present. The city does have several lead grants and does quite a bit of lead remediation work to help, but almost 15,000 homes total are in that category.

I talked about the population decline. This is the key driver of the vacancy in the city. There are neighborhoods that have, you know, a significant amount of vacant property – vacant, abandoned, dilapidated, and blighted fire-damaged property. Almost 12% of the total property in Toledo is vacant. Vacancy is defined in a lot of

different ways, but there's a lot of abandoned, vacant property, but through the Urban Beautification department – they are demolishing vacant properties quite a bit. Year over year, there is a pretty key strategy to continue to do property demolition to try to mitigate the blight issue throughout the community.

When we went through and consolidated all of the things that we learned through the data research, through the conversations that we had, through the community meetings that we had, there were very key priorities that rose to the top. Affordable housing, given the magnitude of the housing cost-burden in the city, affordable housing was the primary need in every single conversation that we had.

The growth of homelessness was another really key priority. Public services – the city has a wealth of agencies and nonprofit providers that are doing incredible work for all types of populations. Public services can include food assistance, senior services, youth services, fair housing activities – lots of different things.

Infrastructure improvements – this could be related to streets; sidewalks; sewers; drainage; stormwater management, those kinds of things; parks and playgrounds; facility improvements, which include public buildings, nonprofit agencies, and accessibility issues for those properties and buildings. Also, economic development, to really help mitigate the sort of stagnation of wages in the city. I'll go through these pretty quickly from the affordable housing perspective. There was a pretty large call for affordable rental and homeownership units throughout the whole city, not just in specific neighborhoods.

There are specific target areas in and around downtown that are going to be the primary focus, but that doesn't necessarily exclude investments of affordable housing in other areas of the city. There is a need for down-payment assistance; could also be closing cost assistance and construction of new housing for rent and for sale; again, the demolition and clearance of blighted homes; special supportive housing for seniors and individuals with disabilities; housing for special needs populations, which can include individuals living with HIV/AIDS; could be individuals who are survivors of domestic violence; could be seniors; persons with disabilities; and veterans.

Homeowner housing rehab – this is actually a pretty important aspect given the physical characteristics of the housing in the city and oftentimes the lack of resources to do proper maintenance on homes, which can then lead to dilapidation of the housing

For homelessness – it's been increasing pretty dramatically over the past several years correlated with the increases in rent. With the pandemic and the most recent data available, there's about 3,400 estimated homeless individuals for the calendar year 2024. The high-risk groups generally are seniors; again, individuals with very severe housing cost-burdens; youth aging out of the foster care system; and single parents. Some of these populations are brand new to homelessness. We have the Toledo Lucas County Homelessness Board here that will go into homelessness a little bit more.

Public Services, again, some of these needs are crime prevention, affordable childcare, afterschool programs, health care, mental health services, domestic violence, adult education, financial literacy, and infrastructure. I was joking with Monica when I was driving. When I first got here, I'm like, oh, the streets aren't so bad here, and then she's like, now you got to go down these streets, and I'm like, oh yeah, the streets are pretty bad here. So, you know, it's the age of the housing and the age of the infrastructure. It's being in the Midwest with incredibly severe winters. All these things come with the streets, sidewalk repairs, sewers, and catch basins.

Then there's kind of a real important call for different types of infrastructure that's not just car-dependent infrastructure, but to support pedestrians, cyclists, and public transit riders as well, and to pull in green infrastructure and environmental sustainability within those infrastructure improvements. Facility improvements; again, I mentioned this before, these are improvements to public buildings and nonprofit agencies, ADA compliance, and childcare centers. Many people mentioned there's certain food deserts in the city, so really focusing on access to grocery stores and healthy food options in those areas. Public parks and recreation, again, was an important aspect of the facility improvements as well.

Economic development – there is a Department of Economic Development in the city. They do great work, but really calling for retention and expansion of existing businesses and new businesses – pulling them in –

workforce development and training programs that lead to higher wage jobs. So that's the key fundamental thing here – people need to make money doing the work that they do. Also, incentives for small businesses and then a paid apprenticeship program for individuals, younger individuals, and young adults moving into the workforce, so that's a lot.

There's a lot there and that's scratching the surface, and then, you know, the city receives in any given year about \$9.6 million. You think that's a lot of money, but it's not a lot of money. Over the course of five years, the city's expecting to get about \$47.3 million to do all the things that we just talked about. There are three different grants that the city receives on an annual basis. The first is the most flexible, which is the Community Development Block Grant. That is also the largest grant and allows the city to do lots of different things so long as it's assisting low- to moderate-income individuals, families, and households, but it can be used for housing, public services, infrastructure, and economic development.

A second pot of money is about \$1.9 million a year, which is the Home Investment Partnerships Program. This is funding dedicated to affordable housing, affordable housing development, new construction, and rehabilitation.

Emergency Solutions Grant is specifically focused on homelessness services and that's the smallest grant, which is about \$650,000 a year. So, what the city really needs to think about are those small buckets of money and the massive amount of need.

Part of these conversations are to really help us understand so the city can target resources in a very, very efficient way. That's kind of what we're in the process of – we're identifying the goals, identifying what the specific resources are, and how the city targets that money to really accomplish goals in a very, very narrow targeted way.

There is a Draft Consolidated Plan that is currently up on the city's website. It's in the Housing and Community Development Department's web page. If you go there, you'll be able to access it. We encourage everyone to review that plan. This is the time to really review it, offer comment; say, Brian, you got this wrong; Brian, you got this right; hey, you should change this; focus this, focus that. This is the opportunity because this is the plan that's going to drive the investments over the next five years.

You can go online and you can review it. It's a very thick, dense document. I would focus on the Executive Summary, and I would focus on the Priority Needs section that will really identify the highest-level items. The 30-day public comment period is open now. It's going until May 23<sup>rd</sup> and you have the opportunity to email public comments. I'll get to that in a bit.

We had a public hearing a couple of weeks ago, we're having today's, and we're having another public hearing next week on May 1<sup>st</sup>. This is the opportunity for people to offer oral or verbal comment. You can also email or mail comments as well. All those comments go into the Consolidated plan as well. It's not like we just don't read them. We accept them, we acknowledge them, we respond to them, and then they go into the Consolidated Plan.

There's two different ways; well, I should say three different ways to offer comment. First is going to be public testimony at the end of this meeting – you can offer testimony here. The second, you can email comments to [neighborhoods@toledo.oh.gov](mailto:neighborhoods@toledo.oh.gov), and the third would be to mail in written public comments to this address – One Government Center, Suite 1800, Toledo, OH 43604. I'm going to leave that up for a couple of minutes if people are writing those down. Thank you.

**Monica Brown:** Thank you, Brian. I saw a couple of people that came in after we started. Before you leave, if you can make sure that you do sign in for us so we know that you were here in attendance.

Next, we're going to have Julie Embree come up from the Toledo Lucas County Homelessness Board to talk a little bit about the homelessness initiative.

**Julie Embree:** Good evening. Again, I'm Julie Embree, Executive Director with the Toledo Lucas County Homelessness Board. I'm honored to speak with you today about a matter that touches every corner of our city – the urgent need for affordable housing and expanded homeless services here in Toledo.

We're a city rich in resilience, but we face a growing crisis with rising rents, stagnant wages, and limited affordable housing, and gaps and services are pushing too many of our neighbors into housing insecurity and homelessness. This is not just a policy issue, it's a human issue. Toledo is at a critical juncture. When we talk about the state of housing and homelessness in Toledo; nearly 3,400 individuals experienced homeless in 2024 alone, a staggering 30% increase over the past four years. This is the second highest in a decade with over half of those individuals experiencing homelessness for the first time.

This is an alarming statistic. At the same time, almost a quarter of Toledoans live in poverty. Rising rents are forcing families from homes they can't afford any longer, and the disconnect between what people earn and the housing costs has created growing crisis for residents teetering on the edge. Despite Toledo's reputation for affordability, nearly one-third of households are cost-burdened, spending more than 30% of their income on housing, and it's not just about economics, it's about equity, stability, and dignity. Behind every number is a person and there's a human impact.

We're talking about seniors on fixed incomes choosing between rent and prescriptions, veterans facing PTSD who can't find landlords who accept their housing vouchers, and working parents with two jobs still unable to secure a safe place for their children. Over 1,600 people in Toledo are currently homeless today, including 322 families with children. These are our neighbors. These stories remind us that homelessness is not a failure of personal responsibility; it's often the failure of systems to provide stability, access, and opportunity, but there is good news and Toledo is not standing still.

When we look at current initiatives and efforts, there's the \$4 million HUD grant through the PRO Housing Program to help us identify and remove barriers to affordable housing production that can hopefully provide relief to some of these individuals. We have Lucas Metropolitan Housing operating over 2,500 affordable units and hopefully being able to expand its reach, but under threat of federal cut. The Home for Everyone Continuum of Care released a strategic plan aimed at providing improved service coordination and reducing homelessness in our community. There are many partnerships in Toledo where we have community groups that are leading options and efforts to increase shelters, expand rapid rehousing, and greater reach through the community through no-barrier housings and other programs. But, through all of this progress, we have to recognize, and it's evident in this report, that there are still gaps that remain. ESG services are sorely underfunded.

We need to acknowledge the gaps and the need for the comprehensive solutions needed, and we appreciate both the city's and CEW's efforts to recognize that in this plan. The affordable housing supply is not keeping pace as there are only 35 affordable units for every 100 extremely low-income renters and over one-fifth of subsidized housing is at risk of being lost by 2031. Our shelters are overburdened. We have vulnerable populations that lack the support that they need, and we lack the long-term housing options and comprehensive prevention strategies, particularly, that rapid rehousing and emergency response efforts could provide to help stop homelessness before it even starts. Coordination and data systems have continued to be improved, but this plan also recognizes the need for better, stronger data evaluation and a closer alignment amongst the city and nonprofits.

We are in motion to create this effort through our Continuum of Care Strategic Plan in Toledo, but there are still opportunities, there are still gaps. They aren't just failures, though, they're roadmaps and this plan helps us to tell exactly where we need to go and who we need to bring with us. We must strengthen what's working and fix what isn't.

The reality that there is no additional money on the horizon is real. Stronger partnerships across city government, nonprofits, housing developers, health agencies, and community groups must continue to look for innovation and collaborative efforts beyond what we're currently invested in. We need more permanent supportive housing and housing problem-solving funds, including staffing to support that, as is evidenced by Brian's report earlier this evening.

This will help to serve the complex needs of our families, our veterans, the elderly, and youth in our community. We continue to need policy changes that will expand access to affordable housing and housing choice vouchers, and holding our landlords accountable for any discriminatory practices. We need a community-wide commitment to tackling the root cause of housing instability, from education and employment to mental health care and addiction services.

We need to leverage these existing momentum and federal services that we still have, and we need to advocate for those that are at risk. So, I'm asking this evening – I appreciate, again, the effort of CEW and the city to put this plan together. I think as a community, we work hard to utilize the scarce resources afforded to us and, although they're not enough, we can come together as a community.

And I'd call on anyone in the audience or who is interested in the plan to make sure that you're looking at ways for you to get involved, attend public meetings, hold leaders accountable, share your stories, and challenge stigma. Because solving the crisis won't happen from the top down; it will take all of us together.

We firmly believe at Toledo Lucas County Homelessness Board that housing is not a privilege, it's a right. So, let's build a Toledo where everyone, regardless of income, background, or circumstance, has a place to call home. We have to do this through further collaboration and innovation. Thank you.

**Monica Brown:** Thank you, Julie. At this time, we'll have Senghor Manns from Lucas Metropolitan Housing (LMH) to talk a little bit about the public housing section.

**Senghor Manns:** So, everything Julie just said. That's a hard act to follow right there, but it's a nice segue into some of the things that I'm going to talk about. So, I'm Senghor Manns. Good evening, I am the new Chief Executive Officer with Lucas Metropolitan Housing – used to be Authority. I am going to take a different approach. I was asked to speak, so I threw together a little bit of a PowerPoint presentation yesterday, but my approach is partly a result of a couple of folks who I believe are relatively astute. They just asked me, just generally – what do you guys do? Public housing – what do you guys do as an organization? Not really clear on that. And it occurred to me that if I'm going to be asking; if the Housing Authority is going to be asking a number of different entities to be partners with us in what we do and what we're trying to accomplish, including expanding affordable housing and eradicating or eliminating homelessness, folks have to know our capacity to do that kind of work and how we can actually work together collectively to do that work. So, what I decided was, I was going to, and this is kind of, I don't know if you handed this out – did you? Yeah?

So, the title is probably not quite accurate. It says Public Housing Introduction and Primer. It's not really a primer, or if you want to call it a primer, it's relatively high level. What public housing authorities do are a lot more nuanced than what you're going to find in here. So, it is relatively high level as an introduction. But I just wanted to talk a little bit about what we do as an organization, how that kind of fits in the broader context of a community, and then what LMH does as it relates to some of the stats and figures that are already contained in the Draft Consolidated Plan, which I'm not going to go into because it's already contained in there accurately.

So, just some historical framework for everyone. The federal government, back in the early 1890s, did a study on urban slums and, from that study, started to come up with ideas on how to address these tenements and these slums that you found in a lot of the urban settings like New York City and Chicago. In 1937, the U.S. Housing Act was established and it established the public housing program, not as we know it today, but a form of a public housing program, and then in the 40's and 50's, they began the construction of public housing. We have some of the oldest housing stock, or portfolio, in the United States. As some of you may know, Weiler Homes, as an example, was built in the late 30's. So, we were a part of this new way of doing things for the provision of public housing and, curiously, if you look at pictures or photos, the housing was more related to workforce housing and more related to folks that were a part of the war, quite frankly.

So, the demographics were a little bit different than the demographics that we currently have. In the 60's, there were social issues that began to emerge in many large urban public housing communities that had us re-vision, or re-imagine, rather, certain policies, if you will, as it relates to public housing; in particular, having families live in high rises. So, as some of you may know, the infamous Cabrini-Green in Chicago, or Robert Taylor in Chicago – those were extraordinarily hard living conditions for families and also created some

breeding grounds for some very tough living conditions, and so they came down. There was a different philosophy that was built as it relates to how we should be housing families in particular. So, in 1965, the Housing and Community Development Act created the Department of Housing and Urban Development, as we sort of know it today, as some of you may know. More recently, HUD has gone through a little bit of a transition. Their department has, I believe, if the most recent numbers are correct, I think that they've lost about 38% to 40% of their staff, so they are not the same entity that they were last year and what that means and what that impact is going to be for housing authorities and communities, it's hard to tell right now, but it's not the same as it was last year or not the same as it was in 1965. In 1974, Housing and Community Development Act established the Section 8 program sort of as you know it now; it was a little different back then. There was also a certificate program as well, but that's when this housing choice voucher program, that we refer to it as, began.

In the 90's, the HOPE VI program was created, which was more of a comprehensive development concept for looking at the development of communities in a more broadly based fashion. So, you would think about the educational system, the health care system, the business community, as well as housing as a more holistic approach to developing public housing and, so then, the subsequent iteration of the HOPE VI program was what's currently the Choice Neighborhood Program to which we received the planning grant in 2020. It says 2022, but it was in 2021. For public housing in particular, there are 3,300 housing authorities in the United States, if you didn't know that. Ohio has 75 of those 3,300 authorities.

Housing authorities range in size and jurisdictions that they represent. Typically, their jurisdiction or territory will be a town, a city, or a county. One of the largest housing authorities in the country is Cuyahoga Metropolitan Housing Authority, which has about 10,500 affordable housing units and another 15,500 HCV units, so, it's a very large housing authority compared to LMH. There are approximately 1.1 million units of public housing in the United States. That's gone down because of some of the programs; the newer programs that HUD has. Through attrition and through these newer programs, they've eliminated some public housing.

It's probably likely that public housing will not increase in the current fashion or form that it finds itself in. Approximately 2.2 million housing choice voucher programs, or vouchers, rather, are issued in the United States currently. That is the preferred method that HUD seems to want as a part of the rental assistance program that they currently have, which is allowing the private market to kind of dictate and help address housing; affordable housing.

LMH has approximately 2,600 low-income public housing units at 25 locations and about 4,500 housing choice vouchers. Structurally, housing authorities are typically enabled by state law. We serve the local jurisdiction, as I spoke about earlier. We mostly administer – some are exclusively federal funds. We have some state funds that we receive. We certainly have some city funds that we receive as well.

We have to comply with all federal, state, local laws, regulations, and ordinances. Typically, our board is appointed by a unit of local government, so in this case, we have a five-member board. Each board is appointed by the city, the county, and by the Court of Common Pleas and the Probate Court. They each have, well, the city has two appointments; the others have one appointment.

Our funds are provided through the U.S. Department of Housing and Urban Development. We are heavily regulated, and I think that's something that people don't understand. We actually have a Bible-thick code of federal regulations that we have to actually abide by, along with a host of other requirements. They call them PIH notices, Public and Indian Housing notices, that we have to adhere to. We have a binding contract with HUD – it's called an ACC, an Annual Contributions Contract. That is essentially the contract that requires us to do things a certain way, and if we don't, they can freeze our funding, and so that ACC contract is a binding agreement between ourselves and HUD. Our primary programs are, as I pointed out, our low-income public housing program and our HCV program – our Housing Choice Voucher Program.

The net position for our organization in 2022 was about \$54 million. Our net position monetarily, or financially, in 2023 was about \$56 million. We technically do not own public housing. We are actually trustees. We have a declaration of trust that we signed and executed with HUD, so although people believe that we own the properties, we actually are the trustees in this very formal sense of...pursuant to a declaration of trust.

As some know, the way that our programs work is that participants for public housing pay 30% of their household income towards their rent. We have a minimum rent of \$50.00, so even if you have zero income, so to speak, you have to pay \$50.00 a month. And then, for the Housing Choice Voucher Program, for income-qualified households within the privately-owned rental units, the participant pays 30% of the household rent.

Federal funds that we receive as a housing authority would be the Housing Choice Voucher Program, the low-income public housing program; capital funds, which is a separate pot; and then what we refer to as our resident supportive services/family self-sufficiency funds. None of those funds can be mixed, and so housing authorities sometimes, or oftentimes get themselves in trouble because they fudge those particular pots of money, so we're very mindful of and sensitive to making sure that we're spending our money the way that it's intended to spend, so, if it's operating funds for public housing, you have to spend those funds only on public housing. You can't spend them on housing choice vouchers. If it's housing choice voucher funding, then you have to spend it only on that. You can't spend it on capital funds. You can't spend it on roofs and those kinds of things. So, when we say that our net cash position is \$56 million, for example, you can then delineate the different funds based on the different funding sources. Even though it's \$56 million, it doesn't mean you can just spend it any way you want to. You have to actually spend those funds in a manner that's consistent with the requirements – the HUD requirements.

So high level, I said that public housing – there are 1.1 million public housing units owned, but 38% of those units actually have families in them. They have families with children in them, and we point that out because, you know, 40% of who we're serving nationally are families, those that have kids. It's not just individuals, it's not just seniors, and being in a position – especially with the current federal framework – being in this particular tenuous position, what's in jeopardy is potentially our ability to continue to serve families and, so, we're being very careful about how we spend right now.

We're currently being cautious about making too many commitments without knowing what the federal funding situation is going to be over the next couple of years. Right now, currently, nationally, there's greater than a \$70 billion deferred maintenance need, so it's just a fancy way of saying, if you look at the entire public housing portfolio across the nation, even if we had \$70 billion, we would not be able to fix all the different things that need to be fixed in public housing. It's just that great of a need and it continues to go up because we can't address it sufficiently at least.

Annual appropriations are another issue that we have to deal with and I'm giving you this context because it's not nearly as crystal clear as people might understand. So, when we get funded, we get funded actually months into the year, and what we find out as a part of that funding is whether or not what's been actually appropriated is actually what's going to be provided to us. The majority of the time, we don't receive what's been actually appropriated. We receive what's referred to as a proration of what was actually appropriated, and that proration is usually around 90%, sometimes 88%. It's been as low as 70%, so you know that you have a dollar that you need, but they're only giving you \$.70, \$.88, or \$.90. That's what it amounts to and, so, we've been dealing with that proration. We do not know what that proration is going to be next year. We were fortunate enough, and I say that kind of tongue-in-cheek – I said I was only going to take about 10 minutes and I'm taking a lot longer than that, I apologize – that tongue-in-cheek because we're currently operating on a – hopefully, I'm not going to be longer than George. I say that about a proration because right now we're operating on a continuing resolution, and what that means is that the federal fiscal budget for 2024 was continued for 2025, which wasn't the best, but it was better than the alternative, which probably would have been a lot less than what we currently receive. So, we're happy that we got what we got, and we'll just see what happens next year.

But we do fear that we're going to be taking a pretty significant haircut. Well, George has the hair; I don't. We feel like we're going to be taking a pretty significant haircut next year, and that's just me being a prognosticator here. Our annual reductions to the capital fund program have been an issue historically. It will probably happen again next year. There is a looming concern about recapturing of funds. So, if you leave funds on the table, HUD may decide to recapture some of those funds and reallocate them in whatever way that they deem appropriate, and so that's just kind of the state right now of public housing from a funding perspective. And really, I shouldn't even be bellyaching, if you want to call it that, because Fair Housing has it even worse, right? What they're dealing with and what they're having to...and I'm sure maybe George – you're

not going to talk about it, but you should – just the threat of certain programs being eviscerated financially or funding-wise is tragic to say the least.

The Housing Choice Voucher Program, again, \$2.2 million – 2.2 million housing choice vouchers. Again, I said 40%...38% public housing. For Section 8, it's about 60% of those vouchers that are actually with families. They're vouchers that serve kids, not only adults, not only heads of household, but actually families that help take care of the people that they love. So, for LMH, we have a vision and a mission. Our vision is to be the lead partner in creating – going back to this initial comment that I had about being a partner and people trying to understand what we do – we want to be a lead partner in creating communities of choice where everyone has a place to call home.

Our mission is to lead in the development and sustainability of housing accessible to all and providing pathways to an enhanced quality of life and to empower vibrant communities. Our strategic objectives – I'm not going to go through all of the objectives in detail because then I really will be here a while – is to lead in the effort to create accessible housing opportunities in Toledo and the region, emphasizing LMH's vital role in addressing the affordable housing crisis.

Two – to increase revenue and pursue diverse income streams, signifying LMH's strategic commitment to financial sustainability and independence from federal funding for objectives of creating unrestricted revenue streams which, again, kind of speaks to the moment right now – if we weren't so dependent on federal funds and the HUD funding, we wouldn't be as concerned about what might happen next year – to build pathways to family income and wealth-building for economic advancement for our families.

We often try to say, and we know that it's going to be very, very difficult to do this, but how do we put ourselves out of business? The way we put ourselves out of business is for every family to be financially self-sustainable, to be independent and, therefore, don't need us. Invest in employee growth and enhance our workplace satisfaction, launch an inclusive communication strategy to educate our stakeholders and foster community awareness, streamline our processes, and elevate user experience and satisfaction so our community can actually better work with us. And then some additional ones are we want to improve the quality of life for our residents and participants through services and programs, ensure safe and secure environments for our staff and residents, create a culture of excellence in the workplace, improve the financial condition of our agency, improve the housing portfolio and housing opportunities, and optimize agency programs and operations. I'm not going to go over all of our affordable housing development and redevelopment efforts, but as was already indicated in the Draft Consolidated Plan, there's a serious need for the expansion of affordable housing – quality affordable housing, and so LMH is doing our part. What I've listed are a number of projects that we're working on currently.

As you can tell, the TDC stands for Total Development Cost, and so \$15 million, \$15 million, \$20 million, \$14 million, \$28 million, \$21 million, and then a couple others that we don't really know what they're going to be, but they'll probably be around \$30 to \$40 million. So, we're investing heavily. We're doing a lot of work in this space to try to make Toledo a better place for folks to live.

And then just a few things that I wanted to point out with the homeownership because, again, the Draft Consolidated Plan did talk a little bit about homeownership, and I don't think that folks know that we actually have vouchers that we provide for homeownership. It's a program that allows for a person – a voucher participant, to have a portion of their mortgage paid for through the voucher. It's a fantastic program. Not a lot of people take advantage of it. We only have 65 homes right now that are currently the beneficiaries of this particular program, but the average home cost is \$90,000, \$89,000, \$90,000. The average HAP, so the portion that we pay, is \$645, and the mortgage itself is \$825, so we pay about 80% of that \$825. It's a fantastic program and it's a way to increase homeownership. And then, finally, there was some talk in the, some reference in the draft about the wait list and the overwhelming need for housing. We do have a wait list. All of our programs have wait lists. They're closed wait lists, but just wanted to indicate that our plan is to open those wait lists this year and, hopefully, expand some opportunities for folks.

So, any questions? Yeah, how are you?



**Monica Brown:** If you have questions, if you can come up to the mic and say your name.

**Audience Member:** I'm interested in this homeownership program. I already own my own home, but you said it doesn't get a lot of traction or it hasn't been getting a lot of traction. Might that be because I didn't even know about it?

**Senghor Manns:** Yeah, I think that's part of it, right...

**Audience Member:** Okay.

**Senghor Manns:** ...which is one of the reasons why I brought it up, right...

**Audience Member:** Okay.

**Senghor Manns:** ...these are things, and so, as an example, and this is – I'm not saying anything negative about anything that we've presented in the draft, but it is something that probably should be in the draft, right? It's not necessarily referenced in the draft. It's me bringing it up so that they can put it in the draft.

**Audience Member:** Okay.

**Senghor Manns:** Right.

**Audience Member:** Thank you.

**Senghor Manns:** You're welcome.

**Monica Brown:** Thank you. If you want a copy of the presentation that Mr. Manns presented tonight, there's copies on the table at the sign-in table. We're now going to turn it over to George Thomas, which we're only giving him 20 minutes to talk. He's from the Fair Housing Center, and he's going to talk about the Analysis of Impediments and that process.

**George Thomas:** All right. Thanks, everyone. I'm George Thomas. I'm the CEO and General Counsel for The Fair Housing Center. I'm actually trying to be shorter than 20 minutes because I know we're almost at an hour now, so my presentation was originally to give quite a bit of background on the requirements to what's called affirmatively furthering the Fair Housing Act and why we talk about that, what we want to accomplish by affirmatively furthering the goals of the Fair Housing Act, but I'm going to skip over most of that part of the presentation and jump right to the part where we really want the most comments from the community and most feedback, which is our action plan. So, what are we actually going to do as a community to advance the goals of the Fair Housing Act? This is really important because in our last five-year action plan for affirmatively furthering fair housing, we identified a number of things that the city then really did take action on.

When we do this study and we identify barriers to fair housing choice, the city really does try to take action on those things. Just like the Consolidated Plan in that presentation earlier, he was saying these plans are really important, they're going to direct what the city's Housing and Community Development department and other parts of the city actually do in the next five years, so I know our Analysis report, which is on The Fair Housing Center's website – it's 167 pages, so it's very medial, and it's a lot of content information. But, at the end of the day, we really want to hear from the public as well. In fact, we actually already did hear from the public as part of this process which has included focus groups, community meetings, and a survey. We gathered a ton of data information, including local history studies that The Fair Housing Center itself has done with other universities, either University of Toledo or BGSU students, working with us to study the different issues in our area.

The goal of all that, like that study, that work, and those community meetings was to identify what we call barriers to fair housing choice. That sounds like kind of a mouthful. So, what is a barrier to fair housing choice? It's those things that might stand in the way, or local policies, or local problems that maybe the city can work on to remove to get people access to the housing that they need. So, if there's something that stands in someone's way – especially if it disparately harms certain protected classes – so, just to give you one

example – lead poisoning incidents are more common for Black families and in central city neighborhoods and we need to see that as a barrier to fair housing choice and then locally work on ways to get rid of that barrier and create that housing opportunity in our community. Or, as another one, if you have a housing choice voucher – a lot of times there's landlords that will discriminate against you and not want to accept your voucher – so, if that's your source of income, that's a barrier for you to get access to the housing that you need. So, the question is, how do we remove that barrier? Because that barrier as well desperately harms certain protected classes like Black families or persons with disabilities, they are far more likely to use vouchers. Those are a couple of examples.

But again, like I said, I'm jumping right into the meat of the barriers we've identified. We identified 14 main barriers which are listed there. Now I have a slide on each of those, so don't feel like you need to write all of those down. I'm going to try to go through them really quickly just to be respectful of everyone's time and give you time for questions or comments. So, criminal history screening – this is when landlords want to screen someone because of their criminal history. HUD has said that this really harms Black and Latino families. What can we do about that locally? There's a new law – state law, that creates a certificate of qualified housing, which means that you can ask a judge to certify that you actually are qualified for housing in spite of your criminal history. But we need social services people to help people get those certificates if they are entitled to them. Homeownership is really key. This is something that Brian talked about, too, that we've kind of over the years shifted to almost a majority tenant city. We're not quite there yet, but we need to build homeownership opportunities, especially for minority communities, people with disabilities, and other protected classes who may traditionally have had difficulty accessing homeownership. We have a number of recommendations for that. For time constraints, I'm not going to list all those.

We need more housing that's accessible for persons with disabilities. This is a huge need in our area because a lot of the housing stock is older. It was built before the current design and construction standards that require accessibility, and so a lot of calls we get, or the calls, for example, the Ability Center gets, is to help folks with disabilities. They receive a lot of questions about how to access housing that's actually going to be accessible for me in spite of a disability. There's a number of things we recommend that the city can do to accomplish that.

Sources of income discrimination – I actually already mentioned this – that's discrimination against voucher holders or maybe people who use Social Security Disability as a form of payment, or Veterans benefits. Landlords shouldn't discriminate based on source of income. There's actually a local law that was passed as a result of our prior Analysis of Impediments' study, but now the next phase of that is to really make sure that law is actually being enforced. Voucher mobility is really important. We have in the past encouraged LMH to take on best practices for voucher mobility. There's a number of very technical things that we don't have time to get into that the local housing authority can do to increase the mobility of voucher holders so they can access the neighborhood of their choice, and the city can also work to help support that kind of work.

Land use and zoning is really important for housing – making sure we remove barriers in the zoning code for the development of new housing, or if there's restrictions on particular types of housing. So, for example, the city has zoning code restrictions against certain kinds of group homes for persons with disabilities. Those do need to be removed to open the opportunities for persons with disabilities to find housing.

For the LGBTQ+ community – one thing we want to identify is, at the federal level, there's been a rollback now under the Trump administration of those particular types of civil rights and so we do have a local municipal code, though, that protects against discrimination on that basis and we may need to look towards enforcement of that local law if the federal government is deprioritizing that.

Homelessness and affordable housing, as Brian mentioned, was a key issue for us, and these are not – I'm not going through these in any particular order of priority necessarily – this is clearly one of the top priorities in our area – to have decent, affordable housing. We've also noted that there are some local laws that limit access to housing services, or make it much more expensive. And, again, that's getting a little bit technical, but anything we can do to reduce the cost or make it faster and easier to implement housing services locally, we recommend could be a good barrier to identify and then remove. In our area, because of the age of the housing stock and disinvestment in certain neighborhood areas, substandard housing is a huge issue. When Brian was talking about blight, that's also true for housing, especially rental housing where investor landlords

purchase the properties and maybe don't have a plan to invest back into them and instead just want to extract as much money as possible. That's definitely a key issue in our area and we have a number of recommendations for that, including services to support the tenants and also services to support landlords who may not be able to afford those renovations.

In our previous action plan for the prior five-year period, we had a number of recommendations related to public transportation. A lot of those did come to fruition with changing the funding of TARTA and making that a countywide program. What we're suggesting in this one is to now follow through and complete some studies, some more work, to make sure that effort actually is best serving the communities that are most reliant on public transportation, especially minority communities and persons with disabilities who are far more likely to use public transportation, and really studying to make sure that service is actually getting to them as well as countywide paratransit.

I'm going to kind of speed through some of these, but rental housing was by far the highest level of concern that we heard from community groups and from our survey. There's a number of things The Fair Housing Center itself just does directly to help folks in rental housing with discrimination issues, violations of the Fair Housing Act, but there's some recommendations we make to the city to improve that as well.

One of our recommendations in the prior five-year period was to have some good local policies related to the resale of water to tenants. Sometimes landlords will charge the tenant for water services even though the tenant cannot place the water services in their own name. Water services can only be placed in the name of the owner of the real estate. That's problematic just in itself because you have to own real estate just to get access to basic water services, so it inherently creates an inequity. So, the problem then is – what if the landlord abuses that power and overcharges the tenant for water, or charges the tenant for a past tenant's water bill that they shouldn't even be responsible for? There are actually some good policies on the books now in Toledo, but we really just need to make sure those are enforced, that landlords are aware of them, and that there are some consequences for noncompliance.

A really key issue that we always come across is – The Fair Housing Center completes more than 2,000 intakes every year of housing complaints – we're very busy, but there's still a lot of housing discrimination that occurs and is not reported, or people don't know how to report it and there needs to be higher level public awareness. We currently have a billboard campaign. Occasionally, we'll do an advertising campaign. We try to stay very involved with the community, but there's always more need for increasing public awareness, having more events, and making sure people know how to report housing discrimination.

The Analysis of Impediments in the Action Plan are both on The Fair Housing Center's website as one PDF document. If you go to [toledofhc.org](https://toledofhc.org), there's a section for publications. The Consolidated Plan is actually there as well, and there's a link to the full Analysis of Impediments, which, like I said, is 167 pages. If you want to look at the Executive Summary and then also look at the Action Plan, those are probably the areas where you would want to pay the most attention.

I also want to be really clear, too. We do not at all expect those 14 points that I made here to be all-inclusive. We really do want to hear from the community if there's other issues that folks feel that we should identify. The very, very last point I will make is, as Senghor mentioned, we are in a very precarious moment for civil rights all across this country. Fair housing really is under attack – that is very real – our funding is under threat. It really should be shocking and sad to everyone. I don't mean to make that as a political gesture necessarily, but it's just the reality of where we are, so, as a community, I think no matter what happens with this kind of work and with identifying impediments at the local level, we can still work on these issues; we can still identify these issues. We can still try to come together as a community and do this work, even if there's some level of retreat at the federal level. I'm very happy to answer questions or receive comments.

**Monica Brown:** Thank you, George. We will now open up the public hearing for any questions. If you do have questions, we ask that you come up to the podium and state your name, and then you can ask your question. We will open it up to any questions for any one of our presenters tonight.

No questions? Okay.

Again, as Brian stated, we are going to be having the public comment period open for 30 days. You have until May 23<sup>rd</sup> to submit any public comments on the Draft Consolidated Plan and also the Analysis of Impediments that's also located on our website. You can email it to [neighborhoods@toledo.oh.gov](mailto:neighborhoods@toledo.oh.gov), or you can mail it to the City of Toledo, Department of Housing and Community Development, 2025-2029 Five-Year Consolidated Plan, One Government Center, Suite 1800, Toledo, Ohio, 43604.

If there are no other questions, that concludes our second public hearing. If you would like to attend the next one, that will be next Thursday, 5:30 p.m. on May 1<sup>st</sup> in Council Chambers.

Thank you, and have a good night.

### **3<sup>rd</sup> PUBLIC HEARING SUMMARY**

#### **DRAFT 2025-2029 FIVE-YEAR CONSOLIDATED PLAN**

**Thursday, May 1, 2025, 5:30 p.m.**

A public notice was posted on 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, 1<sup>st</sup> 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 nine people in attendance at the public hearing.

**Monica Brown:** Good evening. We'll get started in a few minutes. We're waiting on another person to get here. So, we'll start the meeting in a few minutes.

Good evening, everyone. We are here to do the third and final public hearing for our Five-Year Consolidated Plan. My name is Monica Brown and I am the Community Planning and Development Grants Manager for the Department of Housing and Community Development. We will also be having presentations from Brian Hull who's the consultant for our Five-Year Consolidated Plan. He's from CEW Advisors. We will have a presentation from The Fair Housing Center by Noah Woods, and then we will also have our last presentation by Julie Embree from the Toledo Lucas County Homelessness Board. So, at this time, I'm going to turn it over to Brian to go over the Five-Year Consolidated Plan and the findings from that.

**Brian Hull:** Great, thank you so much. My name is Brian Hull. I'm the president of CEW Advisors. We are the consulting firm that was contracted by the city to help them develop the Five-Year Consolidated Plan for the years 2025-2029. I have a short presentation. We're going to go through it pretty quickly to save time for the other two presentations and I'll also have time for questions and comments at the end. My agenda is going to be this – we're going to review what a Consolidated Plan is, what the purpose of the plan is, go through some data and research that we've done, have a discussion about the priority needs that we've discovered, the available funds that will come into the city over the next five years, talk about next steps for the completion of the planning document, and then have some time for public comments.

First and foremost a Consolidated Plan – what is it? It's a very comprehensive strategic planning document, which really brings together lots of information from consultations, from data research and analysis, and lots of community meetings. It's required by the U.S. Department of Housing and Urban Development because the city of Toledo is a recipient of funds through the U.S. Department of Housing and Urban Development – we're going to call it HUD for short. Moving forward – if anyone who's coming in now, could you please sign in for us? That would be great. Thank you so much. The Consolidated Plan is a framework for understanding what the housing, homelessness, and community development needs are in the city and it helps the city think about allocating resources to meet those needs. Everything is sort of funded through the identification of priorities from the community directly.

The community was organized around many different kinds of community engagement efforts to really be a part of this consolidated planning process. The plan years cover July 1, 2025, all the way through June 30<sup>th</sup> of 2030 as part of the Five-Year Consolidated Plan. There's a first year action plan – we're going to go into those specific elements here. So, it's broken down into six elements. The first element is the Executive Summary. It's basically the high-level overview of every section of the plan and the key themes from all those sections. The Process section really talks about what we did to complete the Consolidated Plan. What was the methodology that we used? The Needs Assessment helps define all of the housing, homelessness, and community economic development needs in the city. The Market Analysis talks about the housing market and the trends in housing trends in the economy as well. That really helps understand the baseline needs assessment as well, and the Strategic Plan really pulls together goals and outcomes, priorities, and allocates resources to meet those specific needs.

The Annual Action Plan is year one of the Five-Year Plan, so it really talks about what specific projects the city will be taking for the first year of those five years. Every year the city needs to update that Annual Action Plan, so this time next year, they'll be doing the year two action plan for this Five-Year Consolidated Plan, and then the Consolidated Plan needs to be updated every five years.

When we really got to the meat of the of the priority needs, we did lots of things. Lots of research efforts were involved in this – additional previous planning studies and neighborhood plans, neighborhood assessment studies, reports from other community-based organizations, lots of data research and analysis of multiple data sources, public data sources, and private data sources. We scheduled dozens of interviews, focus groups, and consultations with city staff, county staff, the state agencies, organizations, nonprofit agencies that provide services in the neighborhoods, homeless service providers, the business community, and the housing authority – we did lots of conversations with people. Then we organized – I think, 11 different community meetings, that really brought together individuals from different parts of the city to talk about – to learn from them directly what their specific priority needs are. These were organized around public meetings, focus groups, and roundtable discussions. We also had an online survey. The online survey was open for about three months and we had almost 600 respondents for the survey, so all of that really came together to help us form the fact base of what the community needs were and, again, this was driven by members of the community. Our data research really talks through population; housing; the trends in housing size; housing units; and cost-burden, which was the fundamental priority need identified in every community meeting; and then also the condition of the unit.

So, I wanted to just really go through quickly some of these top-level findings based on our data research. This just shows super high level. The population of Toledo is about 268,000. I'm sure everyone in this room is aware that the city has been losing population for the past 55 years. You know, over the past 14 years of our most recent analysis, you've lost quite a bit of population as well. The number of total households stands at about 118,000. That also has been declining. The number of housing units is about 133,000 in the city. From a racial and ethnic breakdown, about 60% of the population is White; Black or African-Americans is about 28% of the population. You have fairly small populations of American Indians, Alaskan Natives, Asians, Hawaiian, and Native Hawaiians. Some other race is about 3%, and then two or more races at about 7.7%. Regarding ethnicity – Hispanic/Latino is about 9%; White alone, not Hispanic, is about 57%; and all other races, not Hispanic, is about 35%.

This is just another chart that shows the decline since 2010 of the population in Toledo. This has been a fairly significant issue for the city for a long time and the city is aware of it. Everyone in the city is aware of it, but it really leads to a lot of the abandoned, foreclosed housing stock in the city. When we were looking at the age population – the breakdown of age demographics – even though the overall population of the city is declining, we found it very interesting that the senior population is growing pretty significantly in the city. The largest growth increase was the population between 65 and 74. You saw a 51% increase in that population over the period of time from 2010-2023, and the largest decrease were your under-18 population, which saw a 14% decrease. This really is indicative of families not having children. Families, when they have children, have fewer children and it also – you're just not having a lot of children coming into the city as well. This actually has long-term impacts on the school funding and school populations in the city as well.

When we look at housing size – this is the number of people living in any particular housing unit, your homeowners are a little bit larger than your renters. The median size of homeowner housing units – households, 2.27, and renters is about 2.14. We see a pretty dramatic increase in single-person households. These are persons that choose to live alone. Your two-person household has been relatively flat. Your three-person household has been decreasing pretty dramatically, and your four-person household is also decreasing, just not as dramatically. It is interesting that even though the population has been declining, your households – your single-person households, have seen quite a significant growth over the past 14 years.

HUD classifies housing problems in a very, very particular way. That's sort of described for you in this chart. The two biggest concerns are housing cost and severe housing cost. Housing cost-burden is defined as a household spending more than 30% of their income on housing, but less than 50% of their income on housing, and then severe cost-burden are households that are spending 50% or more of their income on housing.

This chart on the right shows that among all the other problems in the city, housing cost-burden is the fundamental problem in the city of Toledo. You have close to – you have over 32,000 households in the city of Toledo, both renter and owners, that have either a severe housing cost-burden or a standard housing cost-burden, which is a significant amount of households. When we look at the breakdown of which income types are struggling the most with housing cost-burden, we see from these charts that, you know, renters are primarily facing housing cost-burden and severe housing cost-burdens more than owner-occupied housing.

We also see that the lower your income, the more likely you are to have a severe housing cost-burden or a housing cost-burden and, not surprisingly, the higher your income becomes, the less likely you are to have a housing cost-burden. The thing that was most distressing when we were doing our research was the extremely low-income renters. These are individuals that make up to 30% of the area median income. About two-thirds of that population are extremely cost-burdened – severely cost-burdened and, in total, you have about three-quarters of the population within that group that have some sort of housing cost-burden. That accounts for almost 14,000 households.

We were looking at the condition of the housing from the perspective of lead hazard risks. We have an analysis framework that we use that really calculates the amount of housing stock in the city that has lead risk based on the age of the housing, but then we also really focus on among those housing units which ones are occupied by children under the age of six. Those are the individuals that are most likely to suffer from lead poisoning. So, when we look at this, in total you have about 14,840 households in the city of Toledo that have a lead hazard, as well as having children under the age of six living in them. The city has quite a few lead grants – it does quite a bit of lead hazard mitigation, but we just also call attention to that. The lead hazard risk is pretty significant in Toledo. We looked at – I'm sorry that I'm going quickly, but there's other presentations – I just want to get through this pretty quickly.

Vacancy and blight – this is really driven by the amount of population decline that the city has been seeing over the past several decades. You have almost 12% of your population that is identified as vacant. Vacancy can take the type of – can be classified in a couple different ways – temporarily vacant, or other vacant. When we look at other vacant, we have a pretty significant amount of housing stock that could be identified as dilapidated, foreclosed, abandoned, really sort of showing signs of neglect and blight. The city has been demolishing homes pretty regularly – annually to eliminate that blight, those blighted properties, and then also offer up opportunities for additional new construction, or providing those vacant lots to abutting owners. It really helps clean up specific neighborhoods and eliminates a lot of the blight that the city sees. It has its strategy to continue to do that moving forward. Blight is one of the primary concerns in the city as well.

When we went through all of our data research and analysis, all of our conversations, all of our community meetings, there were very, very key themes that rose to the top of the priority needs for Toledo residents and these are the six of them – affordable housing, homelessness, public services – we'll get into these, we'll break these down in the next slides – infrastructure improvements, facility improvements, and economic development. So those were the six key themes of priority need, and I'll go through those because they mean a lot of different things. So, from the perspective of affordable housing and the need for affordable housing, both from the perspective of rental housing units and homeownership housing units, was the fundamental concern of every single conversation that we had among the hundreds of people that we've talked to in Toledo. This includes rental housing, homeownership options throughout the city, a need for down-payment assistance and homeownership grants, construction of new housing for rent and for sale; again, the ongoing demolition and clearance of blighted homes, supportive housing for special needs populations, seniors, persons with disabilities, veterans, victims/survivors of domestic violence, individuals with severe mental illness or developmental disabilities, and then a need for homeownership housing rehabilitation, such as the rooftops program or the other programs that the city runs.

Homelessness has been growing quite a bit in the city over the past several years – three or four years. The Toledo Lucas County Homelessness Board will be doing a presentation, so they'll talk a little bit more about homelessness. The homelessness issue is really predicated on the increasing rents that have been pushing a lot of people out of stable housing because their income is not increasing with the amount of rental increase. Homelessness has increased about 33% over the past four years. During the calendar year of 2024, there were about 3,400 homeless individuals in the city of Toledo and the primary risk groups are seniors, when we're talking about those severely cost-burdened households; youth aging out of foster care; and single parents; particularly single mothers. Some of these individuals – some of these groups have never experienced homelessness before and are being pushed into homelessness more and more because of the ongoing increase in rents.

There was a pretty blanket need for various types of public services. These are for individuals that receive services through a network of community-based agencies, and some of the high-level – some of the top priorities that we saw – ongoing crime prevention, affordable child care and after-school care, after-summer

programs for youth and teens, health care services, mental health services, individuals, senior services and services for individuals with disabilities, individuals that are survivors of domestic violence, workforce training programs and adult education programs, financial literacy, and then also services for the homeless.

Infrastructure improvements sort of encompasses a lot of streets, sidewalks, sewers, public parks – these kinds of things. The stormwater management was an issue that was called out in certain areas of the city.

Also, accessibility improvements inclusive of curb cuts and better safety for individuals with disabilities and really just being more thoughtful about the built-in environment and how that can be better – can better serve individuals that are pedestrian cyclists or public transit users versus just exclusively automobiles. Then, as part of all that, really thinking about the environmental sustainability and green infrastructure for those infrastructure improvements.

Public facilities are really focused – anyone who's coming in, if you could sign in next to the door, that'd be great – public facilities is a pretty blanket term for agencies, like the actual physical buildings of agencies and public buildings that help serve people. So, a lot of the results – a lot of the information that we received was focused on the types of buildings and the types of facilities that are really urgently needed in the community.

Healthy food options and grocery stores within specific neighborhoods – within food deserts was called out as a pretty important aspect of community need. But then also just public buildings in general; school improvements; senior centers; neighborhood centers; childcare facilities, particularly childcare as it relates to affordable programs for individuals; mental health and health care centers and then, obviously, parks – public parks and recreational facilities for neighborhood-based – for individuals to help do activities outside.

The last fundamental need was a need for elevated economic development options for people in the city and this is really focused on helping retain existing businesses, bring in new businesses, help businesses that are here to be able to provide more employment opportunities for individuals and, particularly, supporting businesses that are paying higher-wage jobs and living-wage jobs for individuals, which is tied back to workforce development and job training programs. Investments – improvements to commercial spaces – really, really kind of helping the city plan for larger-scale development, while also really helping smaller-scale, you know, locally neighborhood-based economic development opportunities, incentives for small businesses, and a paid apprenticeship program, particularly for graduating seniors or high school students to really help prepare them for employment after high school or after college. So, there's a lot there – there's a lot of need in the city.

I'm sure everyone is aware of the level of need in the city. I talked from a very, very high level about what those needs are and this is what the city is expecting to receive over the next year and over the next five years to really think about how to help address the needs that I just discussed at a high level. The city receives about \$9.7 million annually. The annual amount fluctuates because it's all predicated on budget allocations from Congress and the number of entitlement communities. I won't get into the weeds of that, but suffice to say, over the next five years, the city is expected to receive about \$47.3 million and this is bucketed in three different programs. The Community Development Block Grant Program is the largest program that the city receives funding for. It's also the most comprehensive program and the program where the city can do the most types of activities with. This program can do affordable housing, home repair programs, infrastructure, economic development, and public services. All of those needs that we discussed can fall within that specific program – about \$7 million next year and almost \$35 million over the five years.

The Home Investment Partnerships Program is the second largest program and it's exclusively focused on affordable housing from the perspective of affordable housing development, rehabilitation, acquisition, clearance, rental housing, home-ownership housing, down-payment assistance, or a home rehab program. It could be used to convert a building from a previous use to residential use. So, there's a lot of uses for that funding, but it's committed for affordable housing development and affordable housing from the perspective of an individual spending no more than 30% of their income on that housing – that's about \$1.9 million for the upcoming year and about \$9.2 million over the five years.



The last grant is the Emergency Solutions Grant. This is dedicated for homelessness, homelessness prevention, emergency shelter, rapid re-housing – these kinds of services. It's a fairly small grant compared to the other two. It's about \$650,000 a year and about \$3.3 million over the next five years.

When you think about the level of need that I just articulated and everyone's fairly aware of the limited amount of resources, it's really incumbent on the city to take a focused approach to what it does given the limited scope of funds that it receives. The city could probably get \$47.3 million a year and still not be able to address the need in the city, so part of the role here is really taking all of the information and then prioritizing and, at the end of the day, the city needs to be able to say no to certain things because it does not have the resources to do everything and that's very, very hard to do. So, that's kind of where we are.

The next steps are really focused on helping the city identify how to allocate those funds over the next year and over the next five years. A Draft Consolidated Plan – a draft strategic plan has been completed. It is currently on the city's website and I encourage everyone to review that Consolidated Plan because that is the first draft. That is an allocation of funds for specific projects based on the research that was conducted, based on the conversations that we've had, and we now offer everyone the opportunity to look at that and say, you know – oh, you got this right; oh, you got this wrong; here's my comments on that. It's posted on the city's website in the Housing and Community Development webpage – you can link it. It'll be pretty easy to find it.

There's a 30-day public comment period that is currently open. That public comment period closes on May 23<sup>rd</sup>, so you have a little over three weeks to really review and offer comments on that. The public hearings – this is the third public hearing that we've had. There will be two additional City Council meetings that really talk about the budget allocation process, but right now is the public hearing for the Consolidated Plan and the Action Plan. We can receive verbal testimony, or you can send in written comments, and I'll get to that in a bit.

When the city receives public comment, it responds to each individual comment and those comments go right into the Consolidated Plan, and then after May 23<sup>rd</sup>, in June, the final plan will be completed and then that plan gets submitted to the U.S. Department of Housing and Urban Development, assuming that the city receives its allocations, and then that is the guidance document over the next five years.

So, getting back to this public comment period, comments must be received no later than May 23<sup>rd</sup> and there are two different ways to submit written comments. The first is to send an email to [neighborhoods@toledo.oh.gov](mailto:neighborhoods@toledo.oh.gov), and the second way is to send your written comments to the City of Toledo, Department of Housing and Community Development, 2025-2029 Five-Year Consolidated Plan, One Government Center, Suite 1800, Toledo, Ohio, 43604.

This information is available online as well. We'll leave this up for a bit if people are diligently scratching down those email addresses and mailing addresses. We're going to hold the public comments until after all the presentations. That's it for me.

**Monica Brown:** Thank you, Brian. At this time, we'll have Noah Woods come up from The Fair Housing Center to kind of go over fair housing and the Analysis of Impediment that they did.

**Noah Woods:** Hello, my name is Noah Woods. I'm a staff attorney at The Fair Housing Center, and today we'll be going over the Analysis of Impediments to Fair Housing. Just briefly, The Fair Housing Center is a private nonprofit organization. The City of Toledo contracts with us to conduct the Analysis of Impediments to Fair Housing, which is done on a five-year basis, along with the Consolidated Plan that was just presented. And so, I'm going to skip through a lot of slides here, kind of just on general background about fair housing and get right into the actual Analysis of Impediments. This is an overview of the process that was taken in conducting our analysis and developing this – what we call – we would refer to it as the AI, but the Analysis of Impediments to Fair Housing is what AI stands for.

We begin with doing community outreach through a variety of online surveys, as well as public outreach meetings that we did at some various Lucas County library branches. We get comments and survey data from the public to kind of inform, from the community's perspective, what the key barriers are to housing that folks are facing. We also look at our local history, the demographic data, and census data. We also look at data

from agencies like HMDA and banking data basically to look at different home loans, where they're originating out of, and where bank locations are. All of that information is then synthesized and put into this AI, which identifies the key barriers to fair housing choice in our local community, and then we, as part of the AI, provide an action plan for identifying the key barriers that are listed in the AI itself. This can be found – the full document, I believe, is 167 pages and can be found on our website at The Fair Housing Center. If you just google Fair Housing Center Toledo, it'll pop right up – it's under our Resources tab. It's also on the city's website.

So, jumping right into – these are the key barriers that were identified for this five-year period that The Fair Housing Center prioritized. These are not in any particular order of priority as far as how they're listed. This is just the 14 key barriers that we think that the city should prioritize trying to eliminate. So, just going down the line for each one, there is an action plan that's laid out in the AI itself, and I'll just try to be pretty brief here.

Criminal record history screening is one of the major barriers to fair housing and a lot of people may not recognize, but under the Fair Housing Act, cities that receive HUD dollars have a duty to affirmatively further fair housing. That's a duty that is put on them by the Fair Housing Act itself. And so, the Fair Housing Act says that any policies or procedures that have a disparate impact, or disproportionate impact on certain groups can be unlawful and so, criminal history is the bias that is evident in our criminal justice system. For instance, Black men are arrested at five and a half times the rate as their White counterparts. Similar disparities exist for Latino men, so when those systemic injustices and biases of our criminal justice system are used to screen people for housing, those biases can follow people home.

Ohio did recently enact a law that would permit individuals to get what is called a Certificate for Qualification for Housing. It would incentivize landlords to rent to individuals who may otherwise be barred from housing due to their criminal history. It gives the landlords protection from any potential liability that could arise if that tenant, let's say, were to harm another tenant, and then that tenant wants to sue the landlord to say, hey, why did you put me in this housing? These certificates can address that concern for landlords and help open up more housing opportunities to stop that continuing punishment for people who have already served their time and paid their debt to society, so to speak. So, to identify or to address this barrier, one of the key action plans we think the city should take advantage of is the CQH program and really work with the various agencies doing reentry work to help really roll out a process that can effectively get more formerly incarcerated people these CQHs so they can access housing.

The second identified barrier is access to home ownership. As many people are aware, home ownership is one of the key vehicles to building wealth and to passing along generational wealth and, as the previous presentation noted, Toledo is increasingly growing as a renter - we're getting close to a majority renter city, and so we need to reverse that trend. We want to improve opportunities towards home ownership, especially in our historically marginalized communities that have faced systemic biases and systemic policies that have basically driven home ownership away and eliminated those opportunities for a lot of people in those communities. So, some ways that we have proposed for addressing this barrier to fair housing is increasing home ownership fairs, and the city has already committed to putting on these home ownership fairs. Last year, there was a very successful one, and I believe there's already another one in the works being planned. Another is working on developing incentives to get banks to increase access to home loans and really digging into the data of where our banks are originating home loans out of the most, where they're doing it the least, and seeing how we can address those issues.

Moving to the next one – this is accessible housing for persons with disabilities. Toledo has an aging population as well, and so there's more people. As you get older, you may develop physical disabilities or mobility troubles, and so really addressing some of these issues with inaccessible housing. Additionally, a lot of Toledo's housing stock was developed before enactment of the ADA or the federal regulations that require accessible design and construction. So, one of the key action plans that we've identified with that is ensuring that the city is vigorously enforcing its visitability laws, as well as making sure that buildings are complying with the state and federal laws regarding accessible development.

Source of income – this is another barrier and, in my day-to-day job, I see this issue a lot. Source of income discrimination – a lot of people may be unfamiliar with that. Toledo has – there's not a source of income protection for the state of Ohio, but the city of Toledo has taken that initiative and passed a law that protects

source of income from discrimination. I keep saying that word – what is source of income? It is primarily where your money's coming from should not be a factor in determining if your landlord rents to you. Some people may be familiar with the housing choice voucher, also known as the Section 8 voucher. Some landlords, because of historic stigmas that have been associated with the Section 8 voucher may say, I don't want to accept Section 8. The problem is now you're discriminating against someone based on their source of income, you're limiting their housing choice, and that actually goes against that whole program. The whole idea of the housing choice voucher is to increase mobility for the voucher holder.

The city does already have the law in place and our action plan really suggests just moving forward with developing processes to enforce that law and to have mechanisms to hold landlords accountable who are discriminating on the basis of source of income. Kind of in the same vein as the voucher mobility plan, we've been seeing a lot and we receive a lot of complaints at The Fair Housing Center specifically about housing choice voucher mobility issues, whether that be tenants being unable to get into the housing they desire because of source of income discrimination. We also are seeing, increasingly, issues with tenants who have a housing choice voucher and have secured housing in the private market being unable to then transfer that voucher because there are housing providers who have figured out that it's very lucrative to have housing choice vouchers. It's a consistent source of rent that's coming in, and so there are some issues that we are seeing popping up with tenants not being able to move from one house once they're in there to the next, and so we are encouraging the city to work with Lucas Metropolitan Housing to increase the mobility of voucher holders and their ability to access the housing markets and the houses that they desire.

Land use and zoning action plan – as the previous presentation had mentioned, there's a lot of vacant houses and there's a lot of blighted properties. The city has been tearing down a lot of these distressed properties and creating vacant lots. However, our city's land use policies and zoning code need to be updated to enable more ease in being able to develop sustainable infill development; specifically, putting in housing instead of continuing the urban sprawl that Toledo has seen for the past 40, 50 years – really trying to bring that development back down into the city and develop affordable housing in the city in a lot of these neighborhoods that have been historically divested. Additionally, adopt a local zoning restriction on small-box stores that contribute to the food desert. I do believe that the city is currently entertaining an ordinance to do just that.

Other options or key ideas – action plans, is to look at adopting zoning laws that incentivize development of healthier food options – urban agriculture; those kinds of things. The LGBTQ+ action plan that we've identified especially – we're seeing a retreat at the federal level from protections for the queer community and especially with housing discrimination being a key concern for this community. We think that the city should really take a step forward, even if our federal government is retreating back, and bolster protections for the LGBTQ+ community and combating housing discrimination against this community, and we can do that through enforcement of local laws, even if the federal laws and regulation protections fall back.

Homelessness and affordable housing action plan – I believe the next presenter will really be diving into the issues with homelessness that is affecting the city of Toledo. It is on the rise and, housing insecurity, especially as the first presentation showed, for our very lowest income populations. Housing-burden is significant – the cost of housing is extremely unaffordable for many folks, and so that puts people on the edge of homelessness and we are seeing those rates increase, so we should really be prioritizing to address multiple issues.

Affordable housing – I think a lot of that is a central issue facing the city, and that's kind of at the center of our action plan for addressing homelessness in that vein, and kind of along with the zoning issues is identifying and eliminating local laws that would limit access to housing services and affordable housing developments. There are some local laws that kind of jam up, or make it more difficult to get city funds to low-income and minority neighborhoods, so those laws need to be identified and eliminated so that we can get more funding and more sustainable infill development in some of these communities.

Substandard housing conditions – this is something that I see day-to-day in my job at The Fair Housing Center. We deal with this a lot in our housing conditions program. This is actually a picture of a tenant that we helped get a new porch installed because hers was falling apart and the landlord was refusing to do anything about it. I think just on this note, one key thing that we can do is ensuring the enforcement of local codes, local building ordinances, health ordinances, and really building out our resources for tenants to obtain access to city

services to report these issues and get compliant, get the homeowners – the property owners to bring the properties into compliance. Housing really is a nexus to many other community issues, so poor housing conditions also often lead to poor health outcomes, and so housing conditions tie into a lot of other public health concerns.

Public transportation is another key barrier to fair housing that was identified in our Analysis of Impediments, especially for low-income persons with disabilities and Black families in the city. If you are in the central city neighborhoods and you don't have access to reliable car transportation, then public transportation really may be your only option for going to school, going to the grocery store, and accessing work, and so, if we can build out our public transit to be much more effective, efficient, and affordable, then we will see people having better opportunity to access job opportunities, access healthy food, and then, additionally, it's great for helping with pollution.

Then, impediments in rental housing. As I mentioned, Toledo is growing in the amount of renters that we have in the city compared to homeowners, and many of the actions that the key action plans which are laid out in the AI that I've just addressed, will address a lot of the issues with our rental market. Additionally, and this is maybe anecdotal, but I, in my day-to-day – I'm seeing a lot of out-of-state landlords and investors. I think Toledo was recently in the news for being one of the top real estate markets, so there's a tension on our housing market as an investment opportunity and that doesn't have to be a negative thing, but we need to make sure that we're holding these investors accountable and making sure that they are actually investing into our community and not just exploiting it and pulling money out of it.

Another key barrier that was identified and, more generally, would be utility insecurity. However, this specific action plan – the city of Toledo, based on the last Analysis of Impediments, adopted local laws to help with access to water, and under the current local law, there are prohibitions on the reselling of public water from the Department of Public Utilities. These are positive laws that we have on the books, and now we just need to see more vigorous enforcement and a plan for enforcing these laws. The access to water issue – the prohibition on reselling water from the Department of Public Utilities is particularly important, in my opinion, because we do see a lot of abuse and exploitation occurring through water billing practices. So, there is a framework in place, and so our action plan for the next five years is really figuring out a process for enforcement of these laws and making sure that utilities are being properly billed, tenants have access to the utilities they need, and they're not being taken advantage of.

This action plan is just recognizing that the city does a great job already, but the city needs to continue supporting the ongoing efforts to educate about fair housing, individuals' rights as renters and as potential homeowners, what the Fair Housing Act is, the protections available to all under that act, as well as just really highlighting the benefits of housing and fair housing choice. If we can eliminate these barriers to fair housing, then everyone benefits.

That's all I have, and if you have any questions, I'm happy to answer them, but the AI is available on our website and the city's website. It's a large document, but I would recommend looking at that executive summary and then the action plans for any of these barriers that grab your attention.

Thanks.

**Monica Brown:** Thank you, Noah, and I just wanted to note that he did talk about the Annual Homeownership Fair. We are having our 2<sup>nd</sup> annual one – it's going to be on June 21<sup>st</sup> of this year at Scott High School, from 10:00 a.m. – 2:00 p.m., correct? Yeah, from 10:00 a.m. – 2:00 p.m. So, if you know anybody that's looking to purchase a home, have them attend that homeownership fair that's going to be held on that day – June 21<sup>st</sup>.

OK, so at this time, we'll have Julie come up – Julie Embree from the Toledo Lucas County Homelessness Board to talk about their homelessness initiative. After Julie's presentation, if you have any public comments – if you would step up to the podium right here and state your name, and then you can tell us your comment or your question at that time.

**Julie Embree:** Good evening community members, advocates, and leaders. I'm honored to speak to you today about a matter that touches every corner of our city – the urgent need for affordable housing and expanded

homeless services here in Toledo. We are a city rich in resilience, but we face a growing crisis. Rising rents, stagnant wages, limited affordable housing and gaps in services are pushing too many of our neighbors into housing insecurity or homelessness. This is not just a policy issue – this is a homelessness issue and it's a human issue. Toledo is truly at a critical juncture with nearly 3,400 individuals experiencing homelessness in 2024 alone – a staggering 30% increase over the past four years. This is the second highest increase in a decade with over half of those individuals experiencing homelessness for the first time.

At the same time, almost a quarter of Toledoans live in poverty. Rising rents are forcing families from their homes they could once afford. This disconnect between what people earn and what housing costs has created a growing class of residents teetering on the edge, and despite Toledo's reputation for affordability, nearly one-third of households are cost-burdened, spending more than 30% of their income on housing. It's not just about economics – it's about equality, stability, and dignity. Behind every person, behind every number, is a person. There is a human impact. We're talking about seniors on fixed incomes choosing between rent and prescriptions, veterans facing PTSD who can't find landlords who accept their housing vouchers, and working parents with two jobs unable to secure a safe place for their children. Over 1,600 people in Toledo are currently homeless, including 322 families with children. These are our neighbors. Their stories remind us that homelessness is not a failure of personal responsibility, it's often the failure of our systems to provide stability, access, and opportunity, but there is good news. Toledo is not standing still; there are multiple current initiatives and efforts in play.

A \$4 million HUD grant through the PRO Housing Program has helped us identify and remove barriers to affordable housing production. Lucas Metropolitan Housing operates over 2,500 affordable units and is expanding its reach. The Home for Everyone Continuum of Care released a 2024 strategic plan aimed at improving service coordination and reducing homelessness. Additionally, Toledo's partnerships with community groups have led to new shelter options, expanded rapid re-housing, and greater outreach through the No Barriers and other programs. Yet, for all this progress, we must recognize that gaps still remain as explained in this report.

Acknowledging the gaps and the need for comprehensive solutions, we look at the 2025-2029 Consolidated Plan. It highlights significant areas for improvement, which is affordable housing that was spoken here tonight by several of the presenters. Our shelters are overburdened with 98% of people sheltered during the last point-in-time count. Shelters are at or near capacity and the average stay is far too long. Vulnerable populations lack the targeted support needed to be independent. We lack long-term housing options and comprehensive prevention strategy. Rapid re-housing and emergency response are important, but we also need to stop homelessness before it even starts.

Coordination and data systems still need improvement. The plan calls for a better use of data, stronger evaluation, and closer alignment among city departments and nonprofits. The effort is in motion with the Continuum of Care strategic plan. But here's the opportunity - these gaps aren't just failures, they're roadmaps. They tell us exactly where we need to go and who we need to bring with us in our coordination and collaboration across the community. We must strengthen what's working and fix what isn't. We can do this through stronger partnerships across city government, nonprofits, housing developers, health agencies, and community groups.

We need and require more investment in permanent supportive housing and housing problem-solving funds, including staffing to support housing problem-solving efforts that meet the complex needs of families, veterans, and the elderly. Policy changes are required to expand access to housing choice vouchers and hold landlords accountable for the discriminatory processes that occur in our community, and we significantly require a community-wide commitment to tackle the root causes of housing instability, from education and employment, to mental health care and addiction services.

Today, I had the pleasure of attending the annual Mental Health and Recovery Services Board Awards. We had the opportunity to recognize multiple people across our city and our county that do significant services and go above and beyond to serve individuals with mental health and substance abuse services. These are the type of systemic and community organizations that we need to pull in to solve the issues of homelessness.

As been presented here this evening, the money is scarce. We anticipate further cuts, and we know that we have to do a better job of tackling the silos that exist and reaching across the aisle to other community members. So, we need to leverage our existing momentum and our federal resources to be bolder, braver, and more united in our community efforts.

So, what can each of us do? A call to action – advocate for increased funding at the local, state, and federal level. Support your organizations on the front lines through your time, your donations, and your voice, and just as you are this evening, attend public meetings. Hold leaders accountable, share stories, make sure your voice is known, and challenge stigma so that we can continue to understand the issues that need to be addressed within our community because solving this crisis won't happen from the top down, it will take all of us together.

At the Homelessness Board, we have an important tagline that we like to talk about. Housing is not a privilege, it's a right. Let's build a Toledo where everyone, regardless of income, background, or circumstance, has a place to call home. Thank you.

**Monia Brown:** Thank you, Julie. At this time, we'll open it up for any public comments. If you do have a public comment or a question, if you can step up to the mic at the podium and state your name, and then you can ask your question or make your public comment. So, we'll open it up at this time.

**Audience Member 1:** Hello, my name is Glenn Rine. I'm a precinct committee man for the Lucas County Democratic Party, but the comments I make are on my own. I'm also a housing advocate. I read your 300-page thing, and being a QI person, too, you did a lot of good work in there, and everything you said was pretty much on spot as to what's going on. But I think we need to change how we view housing in America, along with homelessness because what we are doing is basically not working and, unfortunately, your report just offers more of the same.

I think what we need to do – and if you'll let me go off topic, I'll circle back so you'll understand what I mean. When Taiwan was looking into their universal health care, they gathered up a group of people – politicians, economists, experts in the field, and they wanted to do universal health care, so they sent them out to four countries that did universal health care and they met with those people for a week and they said, we want to do universal health care, and each person took a segment of that problem, and then they met every night for five days and they threw out some goals; they put in some goals – that sort of thing, and by the time they went through all four countries, they got a universal health care policy, which is pretty stellar.

I think we need to do that with housing here in Toledo and the way I would recommend it is – I think what we need to do is go to Finland, Denmark, the Netherlands, and Austria, and I know you don't got the budget for it, you know, for a week's stay in all those places, but there's always Zoom – and you get a group of people together; you say, we want to do housing because I think we need to flip the cost of housing. In those countries, they flip the cost of housing by not charging “X” amount of money for your housing, they charge it by your income – 30% of your income and, by doing that, you've just solved housing vouchers; you've just solved people who are low income, but still on the margins.

Everybody has the ability to afford housing, and if somebody that's middle income, like \$60,000 that's in this post taking socialized housing, and I know it freaks a lot of people out when you say socialized housing, but that's what it is. But, if you do that – if a person gets cancer, or they lose their job or something like that and their income falls off, then they're not scrambling to find out where am I going to live because their income – their rent follows their income, and it also alerts social services to say – hey, look, this guy's income just dropped 30%, maybe we all knock on his door; find out if everything's okay; and so that's the way I feel that the city of Toledo and Lucas County should do that.

Kapszukiewicz has kind of a little bit of the right approach with One SeaGate where they've taken the land and allowed the developer to do that. I think we should do that to all the vacant tracts of land that are in the city of Toledo and put up a modular home or something like that based on the person's income – 30%, and then let them live in there and offer them – once everything's built out and paid for – then offer them a rent to buy, and I would also add, I would solar up everything.

Your municipal housing – I would put anything that's got a flat roof – there'd be a solar panel and batteries on it because what you wanted to do is you wanted to make it all electricity and decrease the amount of energy costs for these people, and you mitigate that. So, you've mitigated your housing; you've mitigated your energy costs for these people because, right now, as you saw the economics, we're in a tough spot. Anyway, so I'll get off my soapbox.

Thank you for your... Yes, sir.

**Brian Hull:** Can you say that example that you used at the end? You said, this is a great example, and I didn't hear the name of the firm, or the organization, or the entity that you referred to – not the countries, but...no?

**Audience Member 1:** I'm not following.

**Brian Hull:** Don't worry about it. We'll get it from the transcript.

**Audience Member 1:** Okay.

**Brian Hull:** Thank you.

**Monica Brown:** I want to thank you for your comment, and we are doing some infill housing along with what you're saying with the modular builds – we're starting that process. We're going to be doing two of them in the Old South End, so we are actually working towards that, but that has been noted in the Consolidated Plan – your comments. So, all of that will be taken into account. Okay? Thank you.

**Monica Brown:** Do you want to step up?

**Audience Member 2:** Good evening, my name is Tom Names. I live in West Toledo. I'm running for Toledo City Council. I'm a little bit distressed that I read in *The Blade* newspaper that we're adding all of these new housing units, and they're all rental units. I don't think this is a good idea. I'm glad your surveys have already pointed out that I think Toledo rental units are – people live in like 50% rental units in the city, and you look at our neighbors – our prosperous neighbors – and it's usually more like 25 or 30 percent, and these rental units I see as the future slums of Toledo where we've had on the east side and the north side of Toledo these projects that used to be called in the 50's or 60's. This is what happens when you have people that are renting that don't have an invested sense of community. I attended a block watch meeting and, Chief Troendle, our police chief here in Toledo, even got up and said – these rentals are not good.

I hate rentals – they're hard to police; they invite transients. You don't get a sense of neighborhood, and you understand the concept of community and neighborhood. You don't get that when you have rental units. I'd like to see us get more of the American dream – people out there living. Now, they could look like rental units, but make them condominiums so people have a vested interest and they don't have a lot of pay stubs to show at the end of their career, or hard-earned career. I think affordability is a big issue – I don't want to see the money going to developers. I'd like to see the money being invested in getting the people into their dream of home ownership. I'm glad you mentioned it. This gets married with the fact – a living income – and it has to be tied. Maybe we need, you know, we talk a lot in Toledo government about – oh, job creation. Well, maybe it's not just numbers; it's the quality of jobs that we're creating also. It ties in with it.

We talk about mass transit, and I agree that people need the mass transit to get around, but I think the American dream still resides in having a freedom of mobility and owning a car. I'd like people to be able to drive around and go places.

There are probably a couple other things I could say, but that comes to my mind right now. Oh, yes, the other previous speaker spoke also about the blighted neighborhoods and these run-down houses, and David Mann and his land bank, I think, are doing a fantastic job trying to keep the city looking as good as it did. God help us if he wasn't around to help demolish what he's done and accomplished so far, but let's reinvest in these properties. Over by me, there's a street called Bluff Street and they have all these small houses, and you look at the family units these days and you have statistics like it's usually two per household. Well, that would be ideal for these small units. Why can't we have developers buying up, or actually, I think the city practically

gives away these properties with a promise of development and developing. Take one model and scatter it at six or seven locations around the city. Then a developer takes another model and, right next door, builds another different model at these other six or seven locations around the city. During the 1950's and 60's in the East Coast – people coming back from World War II – great housing booms, okay.

The old Cape Cod, you know, you talked about modular homes – same concept – quick, easy, efficient, easy to maintain. Let's get people in there and use the money – the funding that you have to push them up into a better situation. Same with the homeless people. Get them first housed, of course, but that has to be correlated with – get them self-sufficient, and it's just more than housing, it's closing, it's work opportunities, so they can be self-sufficient. Okay? It goes hand in hand.

All right. Thank you.

**Monica Brown:** Okay, thank you, and your comment will be also noted and put into the Consolidated Plan. Do we have any other comments or questions?

Okay. So, I just wanted to remind you that any additional comments that you would like to make – you have to submit those in writing. You can do it by email to [neighborhoods@toledo.oh.gov](mailto:neighborhoods@toledo.oh.gov), or you can send a written letter to the City of Toledo, Department of Housing and Community Development, Attention: 2025-2029 Five-Year Consolidated Plan, One Government Center, Suite 1800, Toledo, Ohio 43604. We have to have all written comments in no later than May 23<sup>rd</sup> of 2025, and then once we have received those comments, those all will be incorporated into the Consolidated Plan.

As of right now, we still have not received our allocations from HUD. We don't know when we're going to be. They're saying mid-May, but you know, that's all up to Congress and the Administration on when we'll actually receive those allocations, so we're trying to keep moving forward with our plan and making our recommendations on what we want to fund, but we can't do anything until we receive those actual allocations from HUD.

So, if there are no further questions, then the public hearing is adjourned.

Thank you for attending.





## **Toledo City Council**

### **Housing & Community Development** **Committee**

**Councilmember Theresa Gadus, Chair**  
**&**  
**Councilmember Brittany Jones, Vice Chair**

**will conduct a Committee meeting**

**Government Center – Council Chambers**

**Thursday, July 10th, at 2:00PM**

**The purpose of the meeting is to discuss:**

**Community Development Block Grants**  
**Working Meeting**

*The Clerk of Council's Office supports the provisions of the Americans' with Disabilities Act. If you need special accommodations, please call 48 hours prior to meeting time at 419-245-1060 for arrangements.*

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# TCC Minutes

**Committee:** Housing & Community Development

**Date + Time:** 7/10/25 2:00pm

**Location:** City Council Chambers

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**Attendees:** Chair Gadus, Vice Chair Jones, Hartman, McPherson, Williams, Driscoll

**Absentees:** Melden

**Also Present:** Sarantou, Komives

**Presenters:** Rosalyn Clemens, Director of Housing & Monica Brown, CDBG Coordinator

**Public Attendance:** 50

**Legislative Aide Facilitating:** Evan Snapp

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## Topics...

- Community Development Block Grants Working Meeting

## Discussion...

- Gadus: Let's get started with this Housing and Community Development meeting. Our topic today is CDBG, Community Development Block Grants. Thank you everyone for being here, I know there is a lot of passion that you have for this topic. Please sign your name by the door to make a public comment when it is time.
- Clemens: Good afternoon. I'm joined by Monica Brown, our grants manager. We oversee the CDBG program, the HOME program and ESG program. These each are our large block grants for community development. These grants support about 97% of our Housing development work. They are considered entitlement grants, and have been proposed to be cut, including a 87,000 reduction for this year. We are advocating through our congressional delegation to save our funds. This year, we provided HUD with our 5-year consolidated plan, which includes our priorities and planning research, needs assessments, etc. What we hope to do today is have our consultant provide an overview of the plan. HUD caps what we can spend for public service at 15%. Many of our applicants provide this type of public service, but they cannot all be accepted or we will go over the cap. Just some context. Monica Brown will go through some of the process we've gone through.
- Brown: Good afternoon. In the process of doing this, we have been doing our 26 Action Plan and the 5-year Consolidated plan. We must submit these to HUD. Our application process for CDBG funding started in January, apps had to be sent in by February. We held several public hearings between April and May. We held open office hours for community partners. We have a Citizen participation plan, and we go through a citizen



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review board. We also had a public comment period. We expanded education and marketing from previous years. Homeless service providers are in their own category, all non-homeless service providers have a different committee. Our city staff are on an internal review board, but we don't score applications, that is reserved for other committees. All our applicants attend a mandatory submission design meeting, where we go over federal guidelines that must be followed. We had an interview week where we interviewed all applicants. The Director approves, then the Mayor's office, and City Council offers the final approval. The evaluation criteria involves board composition, financial viability, project budgets, and 1:1 match for both CDBG and ESG funds. We look at past performance. We had 35 applications, requesting a total of 4.7 million.

- Clemens: Our 2025 funding amounts to \*\*\*\*\* relative to 2024\*\*\*\*\*
- Clemens: HOME partnership development funds help housing rehab programs, down payment assistance, etc. We have a couple of large rental housing projects that we are committed to, including Thurgood Marshall School. Some ongoing projects take up funds that have been allocated but are still being spent. The ESG program is for the Emergency Solutions Grant. We had about a 900,000 dollar reduction in this program.
- Clemens: The consistent priority need in our city is affordable housing, including housing rehab. That is why we dedicating our 2.3 million carryover to programs dedicated to affordable housing issues. A goal of this administration has been to update, upgrade and maintain our Parks and Playgrounds, especially in low-income areas of the city. Only 6 of my department's employees are funded by General Fund. Everyone else is paid by "administrative fees" of about 20% of our available funds. Managing this process is laborious and we need every one of the full-time employees. About 14% of the total allocation is for public service organizations. A smaller 2% is for capital improvements, another small portion is for capacity building activities within the community. This is how we are proposing to spend the CDBG grant, meeting all necessary thresholds.
- Clemens: Next, I want to go over some of the organizations, and their proposed allocations. \*SEE SCHEDULE A/B\*
- Clemens: Public Service Activities: 15%, NRSA Public Service: 2%, Affordable Housing: 33%, Planning and Administration: 20%, Economic Development: 2%, Neighborhood Parks and Community Centers: 25%, Code Enforcement 1%, Other (Neighborhood Capacity Building Institute) 2%. The total is \$7,046,960.00. Schedule B relates to the Expenditure of Carryover Funds, which as we said is 728,799.00 dedicated to the Housing Preservation and Rehabilitation Fund. That finishes our overview, and we will be happy to answer questions.
- McPherson: I would love to know more about how to help folks get involved in the roofing program, which is a great program. As well, I'm interested in improving the functionality of the Homelessness board. It was a hard winter and the homelessness needs were severe.





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- Clemens: We used some of our funds to set up three different Winter Crisis Centers in partnership with the homelessness board. I can answer your question about the roofing program in depth, by referral.
- Gadus: The first public speaker is Joe Balderas
- Joe Balderas: I am here on behalf of Sofia Quintero Arts and Culture Center. I operate our community garden. We grow pesticide free produce that we give away to the community for free. We grow about 3000 lbs each year. People with food security come to us. We are the only provider of fresh produce, other food pantries give out dry goods or processed, canned foods etc. We are in what is considered a food desert. Our only grocery is very limited. Other stores are just for conveniences, not for healthy food. Please help us, we really believe this is so important for the community, especially the children.
- William Farnsel: Thank you to the City Councilmembers. I am the CEO of Neighborworks. I heard on the news today that there will be a huge new drone manufacturing facility built in Columbus. My point being that our area is not getting these type of economic development homeruns. Our work in this community is about grassroots economic development and workforce development. We have proven the effectiveness of the Financial Wellness Center. I'm asking you today to reconsider our non-funding in CDBG this year. We were informed that we would not receive funding for the first time this year, despite always hitting our goals, benchmarks and thresholds. We have done everything possible to prove we still deserve this funding. We want to promote entrepreneurship in this community so we can eventually hit our own economic boom 'homerun'. Thank you.
- Williams: Just to clarify, your CDBG request was for the Financial Wellness Center. Last year, your organization did not spend all its funds, and some were returned this year. So can you speak to that? What are the numbers that were left on the table last year and this year.
- Farnsel: I believe it was approximately 24,000 dollars last year, and for this year is about 40,000. We don't know where we're at in the last couple months financially because we haven't received our allocations. We're at an awkward standstill for this year's accounting, but our programming remains strong and effective.
- Farnsel: If we don't get this funding from the city this year, we will definitely have to layoff some of our employees. We have a proven track record of 45 years, and I hope that speaks for us.
- Clemens: What we do during our process is look at performance metrics, which includes money left on the table, reimbursements, operating costs, trends, and many other factors. We have to make tough decisions based on how these organizations compare to each other. We want fiscal discipline for these dollars during tough economic times.
- Veronica Martinez: I am a managing attorney with Legal Aid of Western Ohio (LAWO). I am here asking council to accept the recommendation for funding LAWO. We have been



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providing legal services in the area of Housing law to low-income residents for years. It is more important than ever, as evictions continue to rise along with the cost of rent. We recently had a win, that you may have seen in the news, where a landlord was not able to provide water to a tenant. They are now forced to make the necessary investments to improve their property. For residents, our services are sometimes life-changing. We are on track to spend all of our current year allocation and are assisting hundreds of households.

- David Johnson: I'm here for my organization; Johnson Produce Market. We operate a fresh food market on Pulaski Street that provides good nutritious food to members of the community, especially kids that need something nutritious. I'm here because we were denied funding and I can't figure out what else I needed to do. This is the second year we were denied funding.
- Clemens: Thank you for being here. We are aware of your project and its merits but ultimately you were missing documentation at the deadline, I'm sorry. This is why it's important to follow through with our available training workshops and consultations we offer.
- Johnson: Yes, I know, but I did consult with Monica Brown and we thought we were doing everything right.
- McPherson: We appreciate what you do sir, so I recommend that you join the Capacity Building Institute in the winter that will give you the tools to properly submit next year and have all your documentation in order.
- Noah Woods: Hello Council, I'm a staff attorney at Fair Housing Center. Our allocated funding will continue to support all residents regardless of finance or demographics. We educate folks to prevent housing discrimination and offer flexible assistance across the city. We hope the recommendation of the committee is accepted. Thank you.
- Tracy Britt: Hello and thank you. I'm a board member of Neighborworks. I can tell you all about the greater workers we have in our organization and how hard we work to make this organization useful in the community. They change lives. If you have the ability, please just reduce our funding, but don't take it all away. This will have a negative impact on the people we serve.
- Brian Hull: So I will present quickly, I'm the consultant on this series of CDBG funding since I worked on the Consolidated Plan for your Housing and Community Development Department. I will show you a slideshow with an overview of community needs and analytical findings that are based on community feedback, housing strategy, and a rigorous needs assessment. This is all required by HUD for the successful submission. Our planning has also included in-depth market evaluation, literature review of neighborhood plans and other available data. The goal is short-term action for long-term development. We engaged 15+ agencies in Toledo in support of this planning process.
- Theresa Gadus: Seeing no further questions, this meeting is adjourned.

**Brown, Monica**

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**From:** Joanna Byers, MPA <jbyers@areaofficeonaging.com>  
**Sent:** Thursday, April 24, 2025 12:15 PM  
**To:** neighborhoods  
**Subject:** City 5 Year Plan Public Comments

Good day

Below, are my comments and questions regarding the 5 Year Plan:

1. Rent stabilization is desperately needed or we will continue to see an increase in homelessness, especially among single adult households and those age 60+.
2. One reason Toledo struggles to bring new housing developers is the requirement to use only union labor. We also need to research quick housing options, such as pre fab, and ideas such Connect Housing Blocks out of Columbus, OH. The same issue exists for home repair/modification programs for older adults and low income homeowners.
3. Immediate rental assistance that's ongoing is desperately needed. For instance, a monthly stipend to qualified applicants. The plan should include Homelessness Prevention.
4. What is the reason the City of Toledo does not use TBRA funding?
5. What can the City do locally outside of federal dollars? Especially, considering the current Whitehouse administration and current HUD director.
6. Your 1 year goal is to help a total of 80 homeless individuals. That's wonderful, but far short of what's needed, and doesn't address stopping the flow into homelessness.
7. Out of town investors are mentioned repeatedly as being a problem. I strongly agree. What does the City plan on doing about it?

Thank you



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**Comments to Toledo 2025-2029 Consolidated Plan**  
**20250401 Draft**  
**Submitted by Tom Names**

*Tom Names*  
*5/22/2025*

General:

1. Spell-checking should be used.
2. Acronyms should be spelled out the first time used and possibly at the start of new major heading considering the length of the document. Alternatively, provide a glossary of acronyms.
3. A significant amount of the document seems redundant.
4. Possessive words should not be used.
5. Many of the statements made are opinions without justification.
6. The use of superlatives should be more restrained unless better defined, for example, "urgent and very urgent."

Executive Summary (4-15)

1. Delete "important" in "important issues" in the first paragraph. It is subjective.
2. Explain why the City of Toledo is an Entitlement Community.
3. Explain why HOME is in all capital letters. If it is an acronym explain the acronym as done for CDBG in the same paragraph.
4. "The plan was developed based on... consultation interviews with stakeholders..." requires explanation. In the context of this document, it is expected that the stakeholders are those that are either homeless or struggling to have affordable housing, but in a different context, the stakeholders could be out of state landlords. I strongly advocate that the former interpretation be used and implemented. Define stakeholder and provide a list of the stakeholders and their relevance to the interview process. This word is used throughout the document.
5. "Renters unfortunately are less able to implement modifications when the landlord is not interested in modifying the home" needs to be addressed in the strategic plan. What ordinances need to be in place and what can the Landlord-Renter Manager in city government do?
6. Explain the voucher program in public housing.
7. Explain the acronym HMIS under Homelessness Needs.
8. Under Housing Needs add a section for ownership covering situations for house, condominium and other forms of living unit vested interest.

9. Under Housing Needs add a section for home owners associations.
10. All of the Housing Needs subjects need to be addressed in the Strategic Plan.
11. The “Non-Housing Community Development Needs” describes what these are, but does not provide an assessment. It seems Toledo does very well in providing these benefits.
12. Many of the public schools were rebuilt or updated less than 25 years ago.
13. All of the Non-Housing Community Development Needs that are lacking need to be addressed in the Strategic Plan.
14. Explain “street outreach” under the use of ESG-CV Funds. What was spent and what was gained?
15. Explain CoC Collaborative under the use of ESG-CV Funds.
16. Explain TLCHB.
17. Explain the word “stabilize” in “stabilize housing.” Does this mean reinforcing foundations as being done on the Arlington Avenue?
18. Explain how a neighborhood qualifies to be an NRSA neighborhood.
19. Explain the difference between Junction Choice Neighborhood and Junction Neighborhood.
20. “These areas are key to revitalization efforts” is subjective and without context. Suggest the sentence be dropped.
21. Explain why demolitions, home and roof repairs, pesticides, and streetlights do not have a cost associated with it. If funded by others, perhaps the Land Bank, identify.
22. Similarly, explain the government financial involvement in Community Gardens.
23. Do not combine Strategic Goals and Community Impact under the same heading. These are two different ideas and there are other community impact items listed in the preceding and succeeding paragraphs that are not included under this heading.
24. The strategic goals listed under the “Strategic Goals...” heading are different than the strategic goals listed elsewhere in the document. Correct.
25. Specify the amount of the City CDBG obligation is to Fair Housing.
26. Explain the word “support” in “Toledo supports the Fair Housing Center...” Words like “support, collaborate, and partner” are peppered throughout the document. Explain the differences, if any and elaborate specifically on the relationships.
27. Explain why the Fair Housing Center had over 2000 inquiries, but only 125 cases.

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28. What is the “solicitation process for funds” under “Summary of citizen participation process and consultation process.” Do not understand “respondents are required to state the community need they are requesting funding to address.” This sentence does not appear to be relevant with the other thoughts in the paragraph.
29. Good to see a section for the collection and resolution of comments during the public comment period including these comments.
30. The Summary states the Plan will address economic development that is a prerequisite for the grants, but whose economic development? I believe the city has sadly misinterpreted this to mean business economic development as evidenced by the allocation of funds for small businesses. I would like to see it interpreted to mean citizen economic development as in home ownership and the ability to afford housing.
31. Delete sentence, “Given this comprehensive approach and the continued capacity of the City, this plan’s goals and objectives are feasible and achievable.” There is no basis for this statement. It is a self-indulging advertisement. What is the “capacity of the City?” The availability of funding from HUD should be listed as a potential impediment to achieving the goals and objectives.
32. Explain “braided” grant funding.

#### The Process (16-42)

1. “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” should be more inclusive:
  - a. Add “for profit” organizations. DHCD should consider all sources of help.
  - b. Delete “affordable.” DHCD should not exclude any housing developer.
2. The Narrative should describe the organizational interaction of DHCD with the City of Toledo government. Suggest adding the City of Toledo organizational chart.
3. The “partnerships” that DHCD develops with its partners should be written contracts whenever there is a monetary interaction.
4. Replace “thorough” with “extensive” in describing the outreach effort. If it was thorough, all of the citizens would have been included on the survey.
5. Delete “critical” in “critical” stakeholders or explain the difference. It appears that “government” should replace “critical” in this context.
6. Explain the difference between “outreach” and “engagement.”
7. Delete “regular” in “regular communication” unless there are scheduled re-occurring events as used in this context. Cite an example, for instance, block watch meetings.

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8. Delete “an informed set of” that precedes “priority needs.” Instead, explain how “needs” were prioritized and funding allocations were made from such diverse groups. Tie this with the DHCD interaction with government comment made earlier.
9. Relocate “(AI)” after “Analysis of Impediments.”
10. Explain “impression.”
11. Were the 74 responses from individuals totally independent of the 11 responses on behalf of organizations? It appears the process gathered input that was skewed in favor of organizations “with skin in it” rather than from the people that needed housing help. Did the study meet with people that seek housing at Cherry Street Mission?
12. The paragraph, “The City of Toledo continues to promote... “and ensuing paragraphs are written as an unabashed commercial. It should be rewritten only retaining the facts and not unsubstantiated opinions. Adjectives like “better, inclusive, and comprehensive” should be deleted and let the reader make these judgements based on the evidence provided in the Plan.
13. The statement that city yearly meets with other organizations to reduce service gaps needs to be demonstrated with examples. The statement, “efforts are aimed at enhancing the coordination between...” needs to be explained to satisfy the requirements of (91.215 (I). Simply restating the requirement and listing some of the organizations does not fulfill the requirement.
14. A comprehensive list of all of the organizations should be made and the relationships should be defined. This exercise will help identify gaps in the services provided.
15. The city should also meet with organizations to review overlap of services and the opportunity to reduce or amend the services provided by these organizations. During this review process, changes to allocations should be discussed. Provide a clear summary of this effort for the preceding year. Demonstrate that “Increased communication with all community stakeholders will result in more formalized relationships...”
16. The city should also meet with partners where money is exchanged, review contractual compliance and make adjustments. Contracts should be written with demonstratable, measurable benchmarks and goals. The yearly progress should provide the documentation of whether the goals were achieved. Provide a clear summary of this effort for the preceding year. Demonstrate that “Increased communication with all community stakeholders will result in more formalized relationships...”
17. The City of Toledo has a strong partnership with the TLCHB...” paragraph is redundant with the several paragraphs including, “The City of Toledo continues to promote...”
  - Toledo/Lucas County Homelessness Board (TLCHB)”

The importance of explaining the relationship of Lucas County government with the City of Toledo government with DCHD early in the Plan is imperative to understanding the coordination of the Continuum of Care, otherwise these relationships in these paragraphs appear circular. Instead, use this paragraph to expound “works closely” to satisfy the Continuum of Care requirement.

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18. "The proposed strategy entails a thorough evaluation of the system as a whole, to ensure intentional interconnection, responsiveness and equity" are just grandiose words that have no relevant meaning. After the Plan is approved by the city, won't the "proposed" strategy be the "final" strategy? This should be described in the Process. Where is the "system" defined in Plan. What is meant by intentional interconnection? If the homeless were not surveyed, explain the claim for equity.
19. Goals and objectives should not be embedded in the Plan like some kind of hide and seek game. The goals and objectives should be plainly stated in measurable, demonstratable ways. The strategy of developing relationships and interconnecting organizations to satisfy a goal should be delineated.
20. There is an inadequate capacity of shelters for the area homeless. A recent levy was passed for the area Metroparks based on the beauty of the area and the leadership strength of the organization despite the Northwest area Metroparks being Number 1 in the nation. The Metroparks should be rewarded for its expertise by providing shelter housing for the homeless. This will provide a one-stop location for other organizations to provide holistic support with food and clothing. TARTA should provide transportation for the homeless to and from the Metroparks. Other support agencies should be required to attend the shelters including health organizations and employment organizations. The Board of Elections should provide voter registration cards for the "homeless." "Feed a man a fish and you have fed him for one day. Teach a man to fish and you have fed him for the rest of his life." Homeless people that seek shelter at the Metroparks, but choose to refuse help shall be banned from the Metroparks for a set period of time. This satisfies all the stated goals of
  - 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
21. Change "engaged in open communication" to "communicates." It is not clear whether the city or the county does the communicating with various organizations.
22. It is not clear how 211, a phone number, houses anything. Perhaps "Logs of individuals released from these organizations and demonstrating compliance are maintained at the United Way and can be confirmed by calling 211."
23. The City of Toledo partners with the Toledo County Homelessness Board (TLCHB) in several ways to address homelessness..." Explain how federal funding to Toledo is transferred to a Lucas County organization through "Funding Opportunities" and is not intermixed with other county spending in other municipalities.
24. Define "Community in the "Community Data Dashboard," for example, is this data for each municipality, ward or is it county wide?
25. Describe the information in the Data Dashboard. This data collection point seems to contradict an earlier statement that there is not a lot of good reliable data collected for the homeless.

26. Delete "These collaborative efforts help create a comprehensive approach to addressing homelessness in the City of Toledo." This is not true, because there is no mention of asking citizens to help house the homeless. (Page 20)
27. Table 1 is good, but it fails to report the results of the consultations. It may be possible that several agencies were consulted on homelessness, but the results were different. How were the differences resolved? The Agency/Group/Organization Type should declare "government/private and for profit/non-profit in addition to the descriptions provided.
28. What is PHA under Item 23? (Page 26)
29. Add Toledo Area Metroparks to Table 1.
30. Delete "There were no agency types serving the Toledo community that were not consulted during the development of this Consolidated Plan. "It is not true because the American Legion and Veterans of Foreign Wars were not listed. Similar comment for Moose and Eagle type organizations. (Page 32)
31. Do not understand "most community interests have the potential to impact priority needs and their solutions." Delete sentence. Possessives should not be used in a plan of this type.
32. "Forward Toledo" is not a comprehensive land use plan, otherwise there would not be a need for a Planning and Zoning Commission. (Page 33)
33. The "Peace in Motion" is not comprehensive or community-owned. Do not understand "cross-sector." Of what?
34. The paragraph starting on page 34 does not describe the fulfillment of requirement 91.215 (I), Delete "productive" and describe the ways Toledo interacts with the State of Ohio and Lucas County (by reference). Describe the TMACOG relationship and interactions with Ottawa, Wood and other neighboring counties. Describe interactions with Michigan.
35. The paragraph following Narrative (optional) should be deleted. It adds nothing to the Plan. (Page 35)
36. The citizen participation narrative should stress the importance that the plan was not developed by groups of special interests. Do not discuss planning officials, stakeholders, public service organizations, chambers of commerce city groups and agency staff in this section. Explain "self-reinforcing" and high-light divergencies. Include recommendations contained in these comments. What is meant by "previous" surveys?

#### Needs Assessment (43-123)

1. The listed sections of the Needs Assessment do not match the paragraph headings that follow and are categorically un-related. Why is "Housing Needs Assessment" a subcategory of "Needs Assessment Overview?" Why aren't all the items in the list different categories of assessments? Suggest an outline of the report be prepared to better organize the information before preparing the document.

2. It is not clear how a significant drop in the number of vacant units (25%) is a stable housing supply. The figures do not support the statement.
3. Shouldn't "Priority Needs" be "Disproportionately Greater Need?" described earlier as one of the elements?
4. Are the priority needs listed in the order of importance? Where is there a listing of the lower priority needs?
5. Do not use the word "all" in report writing as used "all show" under "Housing Affordability." (Page 43)
6. Do not use the word "desperate."
7. Change "Most of the housing stock in the city is older, with 83.5% being built before 1980" to "Eighty-three-point five (83.5) percent of the city housing was built before 1980. Change "housing stock" to "housing."
8. The housing in other sections of the country may be harsher on housing than in the Midwest, for example, humid arid and salty areas.
9. Make clear whether the LMH is the only agency that issues housing vouchers. (Page 44)
10. Explain "outreach to landlords." It is my understanding that laws protect the use of housing vouchers and is administered by the Fair Housing Administration.
11. Explain "Toledo's growing senior population" using average age over time statistics. Do not use possessives in report writing. (Page 44)
12. Explain how HIV/AIDS individuals require stable housing to maintain a consistent medication regime. The two ideas are not related.
13. Persons with Substance Use Disorders should be a Non-Housing Community Development Need. Explain "Non-Housing" versus "Non-Homeless."
14. Victims of Domestic Violence, Dating Violence, Sexual Assault and Stalking should be a Non-Housing Community Development Need. Explain "Non-Housing" versus "Non-Homeless."
15. Explain the need for the amenities listed under "Public Facilities. (Page 46)
16. Explain "green infrastructure." "Environmental sustainability" is not an infrastructure.
17. Add the services provided by schools, hospitals, doctors, fire departments and emergency relief agencies to the list of Public Services.
18. Provide a copy of the community survey in the Appendix. The survey should have been open to suggestions from the people taking the survey and not closed to the elements shown in the top 10 listed. Given the statistics already provided on affordable housing, it seems better compensated

jobs would have been a high priority, but it does not even appear. See the decline in median income assessment later on in the report.

19. Change "city's school district" to "city school district." (Page 49)
20. Delete "This has an impact on the city's school district as well as local employment opportunities." An assessment of the impact is not included in the narrative.
21. Delete "The predominance of one-person and two-person households in Toledo is significant." The significance is not explained.
22. The small increase in households does not justify the increase in housing and rental costs. I contend the livability attraction of Toledo is forcing the housing market to catch up with national trends.
23. NA-10, Figure 7 and 8 need explanation. What are the abbreviations and listed needs?
24. Explain the basis for the CEW Community Development survey. Was this a survey used in other plan studies? (Page 58)
25. NA-10, Figure 14 is subjective depending on respondents selected in the survey and the size of the survey. It needs to be large enough and very representative of the overall population to draw any conclusions.
26. NA Figure 15 indicates that a single male with a \$31,317 yearly income in a three-bedroom house is cost burdened. I would contend that he just has more house than he needs. (Page 61)
27. It is my understanding that there are other homes for women that are victims of domestic violence besides the YWCA Shelter.
28. "Housing affordability and increasing cost burden is a significant and growing concern..." (Page 43). "The most common housing problem is cost burden." (Page 62). "The most pronounced housing problems are Cost Burden and Severe Cost Burden..." (page 63) It seems this report keeps regurgitating the same opinions.
29. There is no reason for Toledo to take "solace" for renters without citing national rent figures. (Page 63)
30. "There is a disproportionate representation..." needs to be demonstrated with data. (Page 64)
31. The aging of housing discussed on page 66 is also discussed previously.
32. The tables and data described under NA-15 are extremely detailed. Provide the sources of information and the time frame used for collecting the data. (Page 68 and beyond)
33. "Each table provides data for a different income level..." is stated on page 68, but the following two tables do not identify the income level that is applicable.



34. "Housing problems are defined as having one of the following four living conditions..." is described here and elsewhere. Explain the basis of this definition in terms of the numbers used. (Page 69)
35. The idea that there are households with too many people living in the available living space is contrary to the Toledo Forward Plan that recommends a more densely populated Toledo.
36. The definition of disproportionate needs to be explained earlier in the plan. (Page 84)
37. The discussion of tracts needs a map reference. (Page 84)
38. Explain VASH. (Page 91)
39. "There are not enough affordable housing options in the City of Toledo..." needs explanation (Page 91), for example, why can't Chief Troendle find a house in Toledo? Is cheap the same as affordable?
40. What is leasing up?
41. What is tenant-based as opposed to project-based and the other categories in NA-35, Figure 1? Explain family unification.
42. Explain Veterans Affairs Supportive Housing as it relates to HUD.
43. There should be data presented for waiting times for public housing. (Page 93)
44. Explain "300 families annually turnover on the waitlist on average." Does this mean the families find housing?
45. Clarify the statement, "the HCV has been closed... limiting access to assistance... due to significant demand..."
46. Explain "addresses those in place..." (Page 94)
47. Explain "passes the home inspection"
48. I do not believe the statement, "limited workforce development and financial literacy programs for low-income households." (Page 94) Explain available resources and demand. There are many cited later in the document.
49. Explain the Family Self-Sufficiency program.
50. Define Section 8 households.
51. The Discussion is a drumbeat of "There is an urgent need for additional affordable housing..." There are other solutions that should be discussed, for example, the urgent need for higher paying wages and financial planning. The economic growth aspect of this scenario needs to better explore personal wealth growth. The target should not be to merely survive, but to thrive. The current administration boasts of economic growth in terms of private sector jobs brought to the

Toledo area, but does not explain that these are mostly low wage, blue collar jobs, for example, the Amazon warehouse on the former Southgate Shopping Mall site. Also, housing is very affordable in the context of the national housing market. This is why so many non-residents are buying Toledo properties. When these properties are turned into rental units, the rental cash flow leaves the Toledo area. The Plan cites greater median income in the neighboring Toledo towns. This is also true on a national basis. Toledo needs more high wage, white collar jobs. The lack of this diversity accounts for the “brain drain” from the University of Toledo and the exodus of Fortune 500 companies (Page 95) Although this plan was prepared to satisfy a HUD requirement, the plan should not be shaded totally to that purpose.

52. Define children in terms of age. (Page 96) Define sheltered and unsheltered and transitional housing.
53. The data under the homeless section does not discuss people that choose to be homeless, although a vast majority of the homeless choose to seek shelter.
54. “Supportive services that can more effectively address the underlying causes of homelessness and accelerate transitions to permanent housing should be change to “transitions to self-sufficiency.” (Page 162)
55. What is meant by “more limited fixed incomes?” (Page 103)
56. Explain the income limits for Medicaid.
57. Are seniors defined as over the age of 65? Explain.
58. Rehabilitation from substance abuse is predicated on housing stability needs to be explained. (Page 107)
59. The data for SUDs is from Ohio data. Can it be more accurately extrapolated for cities the size of Toledo?
60. There is too much red tape for Victims of Domestic Violence from receiving shelter. (Page 109)
61. Explain service-connected disability rating greater than 10%. (Page 109)
62. Add “Temptation for Crime” in the list under Youth Aging out of Foster Care. (Page 111)
63. Explain the responsibility of TARTA for providing transportation to/from senior centers, YMCA and other social gathering places for seniors. (Page 112)
64. “In addition to diversion...” appears to be a stand-alone sentence out of context with Person with SUDs. (Page 113)
65. NA-50 is Non-Housing Community Development Needs and has become a commercial for community project developments and the PIM undertaken by the city. The previous sections, for example, NA-45 also describes needs, but does not discuss specific cures that the city is undertaking or the services provided by the support organizations. Provide symmetry that covers both needs and actions taken. (Page 116)

66. Modern streets were created to support automobiles. Changing streets to support pedestrians and cyclists is the opposite of modernization. Explain any plans to modernize streets with trolley car transportation or horse and buggies. Explain rental bikes and scooters. (Page 117)
67. Delete "There are safety concerns regarding pedestrian and cyclist accessibility due to high dependency on automobiles" This is a subjective opinion and not supported by any national comparison.
68. Explain how many lane-miles for improvements were made from the capital improvement fund and other sources in addition to the levy.
69. Explain the plan to extend sewers and sidewalks to the rural sections of Toledo.
70. Explain the separation of the septic sewer system from the storm water system. (Page 118)
71. TARTA already has a transportation strategic plan.
72. Explain "first-mile/last-mile."
73. Provide information on rail and plane transportation.
74. There was no information gathered from the development of the Peace in Motion Plan that aligned with the cited needs, for example, veterans and migrants. (Page 121)
75. Provide detail to funded (in part) ... (Page 121)

#### Housing Market Analysis (124-197)

1. The disparity of homeownership units to rentals is over reported. There are more rentals. Compare to neighboring communities and nationally. (Page 124) Explain how it relates to individual economic (wealth) development.
2. Explain why the inflated cost of a new house increases the housing burden on Toledo families. It only applies if seeking a new house and do not have one to sell. (Page 124)
3. The LMH housing units are not located across the city, but in specific, low-income neighborhoods.
4. Explain "detached" home.
5. The 23.9% of single family detached home occupied by renters seems nationally high. It underscores that people are buying very affordable Toledo homes and renting them out. (Page 126)
6. The mix of the new housing units being created is unnaturally slanted towards rental units. Explain why these units are not being developed as condominiums for personal economic improvement and wealth (Pages 127-129)

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7. Subsidized housing and rental units contribute to transients and crime and lack of pride in ownership and upkeep. It is detrimental to neighborhood development. Explain what the city plans to do to overcome this.
8. Explain "reach their period of affordability." (Page 135)
9. It is not clear why there is an overabundance of housing at the same time there is a need for more housing.
10. Explain "Stakeholders." (Page 136) What is the basis of their desire?
11. The explanation that the more money that is spent on housing, the less disposable income is available to spend in the local economy needs to be high-lighted for money that goes to out-of-town landlords. (Page 141)
12. The dire need for "move-in-ready" should not be translated as "new." The old housing stock needs to be maintained up up-graded. (Page 142)
13. The LMH goal of building family income wealth and economic advancement needs explanation. (Page 154)
14. There is no available data on the number of clients served in the list of key organizations. (Page 156)
15. Explain "current and new" in Table 7. (Page 157) What about old?
16. What is H.O.P.E.? Page 162
17. Complete all Yellow high-lighted parts and allow for another round of comments. (Page 163)
18. Define "entitlement/consortia grantees." (Page 163)
19. Sixty and ninety day permitting does not seem lengthy.
20. Zoning regulations are based on housing. Explain "misalignment." There is no basis to blame zoning for disinvestment. (Page 164)
21. Explain lack of local funding sources. There are many banks in the Toledo area. (Page 164)
22. Examples of discrimination discussed need to be addressed by Fair Housing. (Page 165)
23. A shortage of 12,705 rental units for extremely low-income households means the city is not attracting enough higher paying jobs.
24. Bravo for housing design templates for low-cost housing that can be used on razed properties. (Page 166)
25. Explain "Geographic Target Areas." How was it developed and where is it located?

26. Explain the salary scale of the new jobs secured. (Page 167)
27. Explain “activated” square feet.
28. Community vibrancy does not create high-paying jobs. As this relates to high paying jobs and Toledo residents. The Plan should discuss the number of people from neighboring, more affluent communities that commute to work in Toledo in high-paying jobs. A good example is the Amazon distribution center.
29. Explain the different colors in MA-45, Figure 5.
30. The salaries shown in MA-45, Figure 7 explain why housing is not affordable in Toledo. (Page 172)
31. Add the Dorr Street Corridor for planned redevelopment under Streetscape. (Page 174) Explain multimodal transportation.
32. Roads provide adequate infrastructure that connect neighborhoods to employment centers, especially major arteries.
33. TARTA has increased funding. The discontinuation of bus service to employment centers should not occur unless it is no longer warranted. (Page 175)
34. The Four Corners Downtown Redevelopment should be condominium units for ownership. (Page 175)
35. The Vibrancy Initiative should stress the reuse of existing buildings rather the use of new buildings on green sites. Use the Planning and Zoning Commission to enforce. Otherwise, the growth of abandoned buildings will continue.
36. Downtown redevelopment is overemphasized. The best way to support downtown development is to leave it alone and not impose paid parking.
37. Multimodal transportation options are misunderstood. Buses, cycles and walking are fine for people that can’t drive or afford cars, but the multimodal options are otherwise conveniences that few people use. People very rarely walk or bike to grocery stores or health centers. (Page 176) Bike paths should not be a priority over fixing streets, although the government has incentives for including bike paths with streets are redone. Automobiles provide the most flexibility and independence for these activities, especially considering the climate and weather.
38. Discussion of low income corresponds with finding better paying jobs for Toledo citizens. (Page 189)
39. Discussion of the Warehouse District with condominiums and median home value should encourage more condominiums rather than rentals. (Pages 189-190) Condominiums need not only apply to high income families.
40. The city should target at risk neighborhoods... The city could then actively work with the community to achieve those goals” needs more specifics. (Page 191)

41. The discussion on access to the internet should include the services provided by the Toledo-Lucas County Library. (Page 193)
42. The shallowness of Lake Erie, the location of Toledo on Lake Erie and the direction of wind impacts Lake Erie level. (Page 195)
43. "Addressing these disparities requires targeted interventions..." requires a plan that should be defined. (Page 197)

#### Strategic Plan (198-255)

1. There is no evidence that widespread consultation included LMI populations. (Page 198)
2. There is no basis that the city needs to increase pedestrian safety as a priority. (Page 199)
3. Economic Development should be focused on filling vacant stores with high-paying jobs and encouraging home ownership. Incentive programs and tax abatements are a drain on the city resources. (Page 199)
4. The generalities cited need explanation and definition. (Page 199)
5. What are "staff educated residents?"
6. Include block watches in the needs of neighborhoods.
7. The East side of Maumee River should also be a targeted area.
8. Conversions of home ownership to rentals, especially out of town landlords, needs to be addressed. (Page 215)
9. Explain why fair housing is not a priority. (Page 218)
10. Community-Based Development Organizations (CBDOs) needs explanation. (Page 222)
11. The Land Bank also aids owners with the assessment of properties in need of maintenance and resources to provide the maintenance. (Page 227)
12. Consistently capitalize words in the chart. (Page 228)
13. Not clear how the Department of Law provides neighborhood improvements. (Page 228)
14. Explain "Other" in region category. (Page 229)
15. Explain "Other" for the Port Authority. (Page 230)
16. No gaps are declared under "Assess ... gaps" heading. (Page 231)
17. Include "Women of Toledo" from page 233 in the chart on Page 230.

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18. Explain "Street Outreach." (Page 234)
19. Table 14 seems skewed to more rentals than home ownership.
20. The 5.8 million dollars of CDBG funds for infrastructure should go to roads. (Page 238 and page 231)
21. Stakeholders advocating for administrative approvals... needs to be explained. (Page 243)
22. The discussion of zoning and land use restrictions does not balance with the need for preserving neighborhood identity and property value that zoning and land use restrictions provide. Should a high-rise apartment building be located next to the mayor's house in Old Orchard? (Page 243)
23. "A comprehensive strategy to remove or mitigate barriers..." seems like too strong of a promise. (Page 244)
24. Housing design templates that fit razed, blighted sites is a good way to provide homeownership. (Page 245)
25. Financial assistance for permanent housing does not support self-sufficiency. (Page 246)
26. As a safety matter there is no reason to exclude owner-occupied units from the database. (Page 250)
27. It is not clear how sports programs reduce poverty-level families. (Page 252)
28. It is not clear how schools coordinate with this affordable housing plan. (Page 253)
29. Toledo should provide additional oversight of the promises made in the Plan in addition to the HUD program monitoring described. (Page 254)

#### AP-15 Expected Resources (256-265)

1. Change "finds" to "funds". (Page 259)

#### Projects (266-275)

1. Spell out "City of Toledo" before abbreviating "COT." (Page 266)
2. "The greatest hurdle ... budget cuts" should be identified as an impediment. (Page 267)
3. The promise of comprehensive plans that will "eliminate or mitigate" sounds doubtful in light of reduced funding. (Page 267)
4. A shortage of volunteers high-lighted by agencies is counter-intuitive to increased communications between stakeholders to identify gaps. (Page 267)
5. Add East Toledo to the Item 6 Department of Economic Development. (Page 270 and 274)

6. Explain why so much attention has gone into the development of the downtown area, but it is not mentioned in the table. Is downtown development complete?
7. What are homebuyer units? (Page 271)
8. What is the Toledo Capacity Building Institute? Explain through completion of the table. (Page 272)
9. Reference the map where the census tracts can be found. (Page 274)
10. List the five agencies that have certifications expiring this June. (Page 274)
11. The scheduled completion of Broadway in 2024 information is obsolete. (Page 275)

#### Affordable Housing (276-290)

1. Explain "PY." (Page 276)
2. Is gap funding an acceptable use of ARPA funding? Under SMART use of ARPA funding, money is supposed to be used in a sustainable way. Gap funding is not a sustaining use of the funding unless the funding is returned. (Page 276)
3. Explain "high opportunity neighborhoods." (Page 277)
4. Explain "sub-populations." (Page 277)
5. Explain "PHA." (Page 278)
6. Explain the plan to "intensify its work." How will this be measured, especially in light of reduced funding? (Page 279)
7. Explain how connections are made to persons living on the street. (Page 280)
8. Explore using metro park facilities and staff to more substantially address homelessness. (Page 280)
9. Explain "PIT." (Page 281)
10. Explain "CE and CES." (Page 281)
11. Explain "HCRP funds." (Page 282)
12. Explain why local source of income discrimination laws are not being enforced. (Page 284)
13. As the city rezones, notices and public input from neighborhoods is essential. (Page 284) I do not recall any notices on the plans for "Hensville" on St. Claire Street.
14. Do not understand Community Development Corporations and the history thereof. (Page 286)



17/17

15. Explain the differences between the Strategic Plan and the Action Plan. (Page 287)
16. The Plan discusses foreclosure help, but also discusses the need for a foreclosure counseling program. Explain. (Page 287)

Program Specific Requirements (291-297)

1. Explain "TBRA." (Page 294)
2. Explain "HFE." (Page 296)
3. Who are the members of the Toledo CRC? (Page 296) Explain how the selection avoids a conflict of interest.

# Community Meeting Sign In Sheet

Location: Lagrange Library

Date: Jan 6, 2025

Name / Nombre

City / Ciudad

Neighborhood

Phyllis Barnes

William Terr Jr

Shawn Keltner

LMA

Jenny Etk

Toledo Old Town Neighborhood

Woodbury

Toledo

Ann Bell

Habitat for Humanity

William Peterson

Vistula

Jim Schick

MLAC/ABLE

Laya Layton

Toledo

Archie Nick

Toledo

Morgan Feyedelem

MV Habitat

Racheal Lovette

Toledo

Rebecca Green

Toledo / Devedux

Rachel Gagnon

CSMM / Toledo

Kara Jennings

ABLE / Toledo - West Toledo

## Community Meeting Sign In Sheet

Location: Lagrange library

Date: Jan 6, 2025

**Name / Nombre**

City / Ciudad

George Sarantou

City Council

Olivia Weldon

Toledo

Melinda Sanchez

Told

Jean Bylles

Toledo

Doby Sultan

17/11/20

## Community Meeting Sign In Sheet

Location: Lagrange Library

Date: Jan 6, 2025

**Name / Nombre**

City / Ciudad

Archie Beasley Jr Toledo OH

Dirk Tauland Tiedo / maxwell college habitat

Anganda Borton Toledo

Coleena Ali TOCEDO

Leanne Mason Toledo

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Table

Lagrange Library Jan 6, 2025

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	 	2
Community Health Programs and Services	 	2
Drug and Alcohol Addiction Treatment		1
Home Repair Program	  	3
Investments in Education		1
Jobs and Economic Development		1
Mental Health Services		1
Parks / Playgrounds Sports / Recreation		0
Programs for Children Youth and Teens	  	3







Programs for People with Physical Disabilities		0
Programs for People with Developmental Disabilities		0
Public Safety Crime Prevention	  	3
Senior Services and Programs		0
Services for the Homeless	 	2
Services for Victims of Domestic Violence		0
Street and Sidewalk Improvements		1
Workforce Development Skills Training		



Table  
2

Lagrange Library Jan 6, 2025

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	   	4
Community Health Programs and Services		0
Drug and Alcohol Addiction Treatment		1
Home Repair Program		1
Investments in Education		1
Jobs and Economic Development	 	2
Mental Health Services	 	2
Parks / Playgrounds Sports / Recreation		0
Programs for Children Youth and Teens	 	2







Programs for People with Physical Disabilities		0
Programs for People with Developmental Disabilities		0
Public Safety Crime Prevention	 	2
Senior Services and Programs		0
Services for the Homeless	 	2
Services for Victims of Domestic Violence		0
Street and Sidewalk Improvements		0
Workforce Development Skills Training		1
Food Insecurity		1












Table  
3

Lagrange Library Jan 6, 2025

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	   	4
Community Health Programs and Services		0
Drug and Alcohol Addiction Treatment		1
Home Repair Program	  	3
Investments in Education		0
Jobs and Economic Development	 	2
Mental Health Services	   	4
Parks / Playgrounds Sports / Recreation		0
Programs for Children Youth and Teens	 	2

Programs for People with Physical Disabilities		1
Programs for People with Developmental Disabilities		1
Public Safety Crime Prevention		1
Senior Services and Programs		1
Services for the Homeless	   	4
Services for Victims of Domestic Violence		0
Street and Sidewalk Improvements		0
Workforce Development Skills Training		1



Table

4

LeGrange Library Jan 6, 2025

## PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing		4
Community Health Programs and Services		1
Drug and Alcohol Addiction Treatment		0
Home Repair Program		3
Investments in Education		0
Jobs and Economic Development		2
Mental Health Services		0
Parks / Playgrounds Sports / Recreation		1
Programs for Children Youth and Teens		3











Programs for People with Physical Disabilities		1
Programs for People with Developmental Disabilities		1
Public Safety Crime Prevention		2
Senior Services and Programs		3
Services for the Homeless		1
Services for Victims of Domestic Violence		0
Street and Sidewalk Improvements		2
Workforce Development Skills Training		1












Table  
5

Lagrange Library Jan 6, 2025

**PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY**

Affordable Housing	  	3
Community Health Programs and Services		0
Drug and Alcohol Addiction Treatment		1
Home Repair Program	    	5
Investments in Education		1
Jobs and Economic Development	     	6
Mental Health Services		1
Parks / Playgrounds Sports / Recreation		1
Programs for Children Youth and Teens	  	3

Programs for People with Physical Disabilities		1
Programs for People with Developmental Disabilities		0
Public Safety Crime Prevention	  	3
Senior Services and Programs	 	2
Services for the Homeless		1
Services for Victims of Domestic Violence		0
Street and Sidewalk Improvements		1
Workforce Development Skills Training		1

	<b>Table 1</b>	<b>Table 2</b>	<b>Table 3</b>	<b>Table 4</b>	<b>Table 5</b>	<b>Total</b>
Affordable Housing	2	4	4	4	3	17
Community Health Programs and Services	2			1		3
Drug and Alcohol Addiction Treatment	1	1	1		1	4
Home Repair Program	3	1	3	3	5	15
Investments in Education	1	1			1	3
Jobs and Economic Development	1	2	2	2	6	13
Mental Health Services	1	2	4		1	8
Parks / Playgrounds / Sports / Recreation				1	1	2
Programs for Children Youth and Teens	3	2	2	3	3	13
Programs for People with Developmental Disabilities			1	1	1	3
Programs for People with Physical Disabilities			1	1		2
Public Safety / Crime Prevention	3	2	1	2	3	11
Senior Services and Programs			1	3	2	6
Services for the Homeless	2	2	4	1	1	10
Services for Victims of Domestic Violence						0
Street and Sidewalk Improvements	1			2	1	4
Workforce Development / Skills Training		1	1	1	1	4
Food Insecurity		1				1



# AFFORDABLE HOUSING

Building New homes  
for purchase.  
Home ownership  
Build Neighborhoods

Make Community  
More Inviting

Do Not Allow  
Investors to buy  
these homes

1. Affordable.  
Housing  
Teach people how  
to apply for loans  
and grants for  
their housing.

Maximum rent  
thresholds / rent  
reasonableness  
Rent can be no higher  
than XX% of  
assessed property value.

Gap funding  
for builders -  
cover gap  
between cost  
and affordable  
Sale price

More  
affordable

Afford Housing  
↓ down payment  
Make home  
Affordable to  
Low to Mod  
Income Person

~~Build more~~  
1 Build more

build more  
mixed income  
housing

Partner w/ banks, hospital  
systems, corporations in  
the area to create  
affordable homeownership  
assistance - one way for  
them to invest in  
their community

Saving  
existing  
housing

More homeownership  
Programs for families

\$ for  
supportive  
housing

- More 3-4 bdr  
Public housing

Similar  
initiative to  
Historic South /  
in East Toledo  
(mainline)

Build more  
Public housing

Application Process  
• No Standards  
• Possible RP  
Calculations  
• Incorporate  
qualitative info  
in applications

affordable housing  
Toledo needs more  
for seniors, singles  
and married people  
not enough space,  
clean + warm  
apartments

Emergency  
Rental  
Assistance when  
families have  
emergencies  
Affordable  
housing

Cooperative  
affordable  
housing

Help offset  
expenses w/ costs  
of construction  
to build a  
temporary apartment  
housing stock by purchase



# HOME REPAIR

Use Small  
Business to  
bid on jobs

Lead paint/pipe  
remediation for  
ALICE populations

2 Grants/Programs  
to help

LEAD SERVICE  
LINE  
Replacement

Ramp  
Build/  
Install  
program

Education for

Roofs for  
ALICE Populations

low  
barrier <sup>ROOF</sup>  
home repair  
programs

More Program for  
home repair

Roof  
Replacement

Lead  
Abatement

Down Payment  
Assistance

Partner w/ Banks, hospitals,  
corporations in the area  
to contribute to home  
repair initiatives

Home  
safety  
&  
structure

Home Repair  
Program for  
Middle Income  
Above 50% AMI

Volunteer help to  
assist the  
homeowner with  
cosmetic help on  
the outside of the  
property

Code  
Compliance

Block by Block  
rehab

Lead abatement  
Partner w/ school districts,  
banks, hospitals systems  
to contribute to community  
health

Home Repair  
Make repairs  
available to  
homeowners who  
qualify. The  
state can  
fund

Funds for  
home repair  
as needed  
by low income  
owners and renters

Invest in  
orgs already  
doing home  
repair

Home Repair  
funds and grants  
for homeowners  
that up to  
date with their  
property taxes

Neighborhood  
organizing groups  
do more  
attention + more  
funding + connect  
to resources

Subsidies for  
Healthy  
Safe (Lead-  
free) Housing  
Affordable  
housing

Lead  
Abatement

Preserve  
existing historic  
homes + make  
affordable



# ECONOMIC DEV

Clean up  
areas

Welcome new  
reputable  
businesses to  
area

World Force Dev.  
training for  
adults + youth

3. New Goals

economic dev.

Tax incentives to  
pay workers  
living wages +  
provide benefits

The economy

childcare programs  
for ALICE pops

Economic Dev.  
Provide opportunity  
to bid (sm.  
businesses on  
city jobs - No  
Replicator

having school/  
be relevant  
to there lives

Education  
Inclus

Partner w/ school  
districts for career  
tech student to  
community learning center  
And job training And

#3  
Eco Development  
QD Sorry I don't  
have a nice answer  
for this one. NO ONE  
wants to go to work.  
Stop some of the funding  
Also stop giving certain  
hand outs that make  
our residents lazy and  
dependent.  
If people get to work  
they have self worth +  
money goes around.

Basic rule  
Attract businesses  
to area -  
increase ~~transit~~  
transportation to  
major employers

Paid  
Apprenticeships  
For 17-24 yr olds

Corporations Public  
"Robot" A School  
Feeder Area  
To Employ Graduates

Need housing  
for workforce  
to attract  
workers  
thru

Tax benefits for  
major employers  
who are 1. outside  
public transit routes  
2. have hours outside  
public transit hours  
and are willing to offer  
transportation to work for  
their employees



# YOUTH SERVICES

More after  
school  
programs

Reading Programs  
For Youth

HAVE MORE youth  
programs that  
teach not just  
academics but also  
life skills of the day

4. New  
Programs

their life  
matters

More  
vocational  
schools

1. Reading  
- Youth

Youth  
Youth financial  
planning/investment  
programs

Summer Jobs for  
Youth

Youth Services  
Need more activities  
for our youth that  
will take them  
into ~~adulthood~~ adulthood  
Teaching how to  
stick with  
achievements

emergency  
mental  
health  
services for  
youth

Fun → Not  
all preparing to  
be an adult →  
Childhood should  
be fun!!

Partner with  
MANY organizations  
to work with them  
to provide what the  
kids need - not  
just a program  
or idea to  
run

Youth Future  
Planning programs  
↳ skill building for  
future rent, homeownership,  
employment, soft skills

Youth - provide  
training for  
youth.  
↳ Youth learn  
and listen  
to youth - not  
to adults!  
Provide training  
for youth that  
will lead to  
jobs, and  
education

Support programs and  
incentive school  
districts to keep  
kids in school -  
stop pushing them  
out

Year Round  
Open School House

Classes to help  
young ppl entering the  
working world on how  
to pay bills and build  
credit mandatory

LIFE  
NEEDS  
MEANING

Better support  
for youth in  
crisis -  
passed between  
20pt, LCCS, MHRSB,  
TOD

TRANSPORT

Universal  
Pre-K



# PUBLIC SAFETY

• Persons in  
Neighborhood  
• Black community  
• Community

5. Cameras

drug  
and  
~~mental~~ mental  
healthy  
programs

More officers of  
Color in our  
Community

More Police  
who engage with the  
Community.

Use Shot Spotter  
Money Towards More  
Video Surveillance  
Real Time

More  
Money

- Public Safety -

#5

Public Safety Crime  
Prevention

• Our cops / schools /  
parent need to teach  
our kids. The police  
Need to enforce the rules

Support programs  
and reinforce school  
districts to keep  
kids in school -  
STOP talking  
them out!!!

Public Safety  
Community  
Policing

Public Safety  
Neighborhood  
groups to  
connect to  
resources

G.B.E.

Citizen  
oversight  
of TPD  
and Sheriff

# Community Meeting Sign In Sheet

Location: Believe Center

Date: Jan 7, 2025

Name / Nombre

City / Ciudad Neighborhood

Marvel Mathis Jr 1

John Holmes 1

Douglas R. Minebaugh Kenwood/Sheridan Place

Steve Sauten Old South End

Julie Grasson Mayfair Park

George Sarantou Toledo City Council

Laya Dayton Toledo

Ray Nix Toledo

Eric Scott Toledo

Vincent Riccardi Toledo

Raphael Gardner South End / Colburn

Copeena Ali Swanton

Ramona Perez S. Toledo

ED Adams SOC

Andy Weaker Toledo



# Community Meeting Sign In Sheet

Location: Believe Center

Date: Jan 7, 2025

Name / Nombre

~~City / Ciudad~~ Neighborhood















Belinda Strode

OSE

Table 1

Believe Center Jan 7, 2025

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	 
Community Health Programs and Services	
Drug and Alcohol Addiction Treatment	
Home Repair Program	
Investments in Education	   
Jobs and Economic Development	   
Mental Health Services	
Parks / Playgrounds Sports / Recreation	 
Programs for Children Youth and Teens	 
















Programs for People with Physical Disabilities	
Programs for People with Developmental Disabilities	
Public Safety Crime Prevention	
Senior Services and Programs	
Services for the Homeless	
Services for Victims of Domestic Violence	
Street and Sidewalk Improvements	
Workforce Development Skills Training	  

Table 2 Believe Center Jan 7, 2025

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	  
Community Health Programs and Services	
Drug and Alcohol Addiction Treatment	
Home Repair Program	
Investments in Education	
Jobs and Economic Development	
Mental Health Services	
Parks / Playgrounds Sports / Recreation	 
Programs for Children Youth and Teens	



Programs for People with Physical Disabilities	
Programs for People with Developmental Disabilities	
Public Safety Crime Prevention	
Senior Services and Programs	
Services for the Homeless	
Services for Victims of Domestic Violence	
Street and Sidewalk Improvements	
Workforce Development Skills Training	



Table 3 Believe Center Jan 7, 2025

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	
Community Health Programs and Services	
Drug and Alcohol Addiction Treatment	
Home Repair Program	
Investments in Education	
Jobs and Economic Development	
Mental Health Services	
Parks / Playgrounds Sports / Recreation	
Programs for Children Youth and Teens	




Programs for People with Physical Disabilities	
Programs for People with Developmental Disabilities	
Public Safety Crime Prevention	
Senior Services and Programs	
Services for the Homeless	
Services for Victims of Domestic Violence	
Street and Sidewalk Improvements	
Workforce Development Skills Training	

Table 4 Believe Center Jan 7, 2025

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	     
Community Health Programs and Services	
Drug and Alcohol Addiction Treatment	
Home Repair Program	 
Investments in Education	
Jobs and Economic Development	 
Mental Health Services	
Parks / Playgrounds Sports / Recreation	
Programs for Children Youth and Teens	





Programs for People with Physical Disabilities	
Programs for People with Developmental Disabilities	
Public Safety Crime Prevention	
Senior Services and Programs	
Services for the Homeless	
Services for Victims of Domestic Violence	
Street and Sidewalk Improvements	
Workforce Development Skills Training	



Table 5

Believe Center

Jan 7 2025

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY









Affordable Housing	 
Community Health Programs and Services	 
Drug and Alcohol Addiction Treatment	
Home Repair Program	
Investments in Education	
Jobs and Economic Development	
Mental Health Services	
Parks / Playgrounds Sports / Recreation	
Programs for Children Youth and Teens	

Programs for People with Physical Disabilities	
Programs for People with Developmental Disabilities	
Public Safety Crime Prevention	
Senior Services and Programs	
Services for the Homeless	
Services for Victims of Domestic Violence	
Street and Sidewalk Improvements	
Workforce Development Skills Training	

Table 6 Believe Center Jan 7, 2025

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	  
Community Health Programs and Services	
Drug and Alcohol Addiction Treatment	
Home Repair Program	 
Investments in Education	  
Jobs and Economic Development	   
Mental Health Services	
Parks / Playgrounds Sports / Recreation	
Programs for Children Youth and Teens	  

Programs for People with Physical Disabilities	 
Programs for People with Developmental Disabilities	
Public Safety Crime Prevention	
Senior Services and Programs	
Services for the Homeless	
Services for Victims of Domestic Violence	
Street and Sidewalk Improvements	
Workforce Development Skills Training	 

	<b>Table 1</b>	<b>Table 2</b>	<b>Table 3</b>	<b>Table 4</b>	<b>Table 5</b>	<b>Table 6</b>	<b>Total</b>
Affordable Housing	2	3		6	2	3	16
Community Health Programs and Services			1		2		3
Drug and Alcohol Addiction Treatment			1			1	2
Home Repair Program	1	1		2		2	6
Investments in Education	4					3	7
Jobs and Economic Development	4	1		2		4	11
Mental Health Services	1		1		1	1	4
Parks / Playgrounds / Sports / Recreation	2	2		1			5
Programs for Children Youth and Teens	2	1	1			3	7
Programs for People with Developmental Disabilities						2	2
Programs for People with Physical Disabilities							0
Public Safety / Crime Prevention		1		1		1	3
Senior Services and Programs						1	1
Services for the Homeless	1		1	1		1	4
Services for Victims of Domestic Violence				1			1
Street and Sidewalk Improvements		1		1		1	3
Workforce Development / Skills Training	3					2	5



# HOME REPAIR

## Home Repair

Sewage + Drain  
repair/replacement  
assistance

More Repair  
Programs for  
Windows, Siding  
Foundation

Repair  
owner occupied  
homes

not base  
on income  
just home  
ownership

## Home Repair

Non-  
Income  
Based

offer basic  
home repair  
classes

Access to  
trusted  
Contractors  
to  
complete  
home  
repairs

Home Repair  
- Prevent Problems -  
When the people who  
stay in the house  
are healthy, the  
house is healthy.

⑥

Believe Center



# PROGRAMS FOR YOUTH!

Bring back program like nysop for youth

After School Care

Address trauma & adverse childhood events

More accessible youth programs

More Youth Programs

Summer PROGRAMMING while Parents WORK

4. Lucas County Trade Schools

More community based options to defer court involvement

Need to Ash the kids to much sports

Programs for youth - aft. school BY WEEK END Programs - M H Drug Prevention Self Esteem \$ 11000000

Programs for youth \* Social emotional & Leadership Skills

Programs for Youth More activities outdoors and disconnected from phones/tablets.

After School and Summer Youth Programs

(18)

Believe Center



# INVEST. IN ED

Mandatory financial  
program/class taught  
at Toledo public  
schools starting 2nd grade

College  
trade  
School  
long term goals

More pre k  
support

PRE-K

Universal  
Pre-K

Address trauma  
& adverse childhood  
events

More training  
in H.S.

Trade school  
for  
Lucas  
County

3. More STEM  
in TPS

Investments in Education

Programs for  
HS → college,  
gap year  
alternatives

Parenting  
Classes

Invest in  
- Incentives for  
job training  
- Medicaid Programs

Mentorship  
to  
Skilled  
Trades  
Non Degree  
Programs

Education  
Pre-K  
Head Start  
Preventive  
V.S. Responsive

Education 2020-2030  
Have community meetings  
& share test results  
w/ parents - community  
stakeholders

Gardening  
&  
Cooking  
Classes

19

Believe Center



# JOBS + ECON DEV.

Job's  
that paid  
well you  
can  
buy house and  
not care

Jobs + Econ. Development  
Lower barriers  
to new businesses  
in Toledo - small  
biz tax credits

Business  
Retention and  
Expansion

Incentives for  
higher wages  
+ paying living  
wages  
SMB

Jobs to Done  
- Programs throughout  
the city to  
help those secure  
jobs - learn  
skills + training

2. Small Bus.  
Grants & Contracts

LIVING  
WAGE  
JOBS

Small  
Business  
Development  
in  
OSE

Jobs\*

- Small Business funding
- ↳ Technical support  
to higher locals
- ↳ Leveraging  
Community Reinvestment  
Act

Believe Center

(18)



# AFFORDABLE HOUSING

Limit companies  
from mass  
purchasing of  
homes

Budgeting/Use  
Classes more  
frequent &  
more locations

Housing construction  
subsidies

land use &  
zoning reform to  
ease development  
process

people  
owning  
their home

Affordable Housing

More 1st time  
buyer assistance

larger affordable  
family homes

More  
Affordable  
Move-in Ready  
Homes for  
Purchase

HOME  
OWNERSHIP  
loans and grants

MAINTAIN THE  
HOUSING STOCK  
VALUES by  
more Private  
Investment and  
required  
maintenance

Address &  
trauma &  
Adverse childhood  
events

Housing-  
First Time Home  
Owners funding

1st time  
home ownership  
programs

Multigenerational housing  
so folks aren't  
on wait lists for  
months

Affordable  
subsidized housing  
So low income  
housing is not  
needed upsets  
people as we have  
seen on the news

Afford Housing  
Programs Available  
to help low income  
to purchase home  
don't report

have rent  
reported to  
credit agencies  
to ~~help~~ for  
those receiving  
subsidies

(24)

Believe Center

# Community Meeting Sign In Sheet

Location: Mott Library

Date: Jan 8 2025

Name / Nombre

Neighborhood / Vecindario

Wenona Williams

Englewood

Dennis Ford

Englewood

Erin Kramer

Heatherdawns

Archie Beasley

Warren-Sherman

Andrea Jackson

Scott-Park

Amber Hawkins

Heatherdawns

Manuel Mathis

Englewood

Amy Merkel

MVHFH

Melaine Krug

Reynolds Corners

Paul Ashley

OWE

Rita Bartlett

Junction Asad.

Coleen Ali

Junction

PAUL SULLIVAN

WAREHOUSE  
DISTRICT

MORRIS DECEOGH

43614

Leonard Bryan Bey

43607

# Community Meeting Sign In Sheet

Location: Mo # Library

Date: Jan 8, 2025

Name / Nombre

Neighborhood / Vecindario

Micah Lewis Franklin Park

Cassie Lewis Franklin Park

Joyce Morris Grand Ave

David Driggs W Toledo

Paul Rice Toledo

Sarabe Williams ingewood

LANE L. BENFORD SECON GARDENS

Fraz Betts Toledo

Pr. Mike Vistula

Mike Deek, L old orchard

Reggie Williams Englewood

Debra Sue Pearson Vistula

annora Harbick Reveaux

Robert Selva Gerez

Norris Thomas 43611



Community Meeting Sign In Sheet

Location: Mott Library

Date: Jan 8, 2025

Name / Nombre

Neighborhood / Vecindario

Tomika Wiley

Reynolds Corner

-Carol Anderson

Riverside Drive

Latasha D Frye

Junction

Carla Thomas

NA

Cindy Shackelford

Holland OH

ELAINE HUNTER

SECON GARDENS

Eric Jo.H

Toledo

THERESA FOSTER-JOHNSON

JUNCTION

Shawn Kellaborn

OWE

Jenny Middaugh

Alldays

Laya Layton

Toledo

Yolande Waelberg

Toledo

TEVIN WILLIAMS

ENGLEWOOD

Dianne Jones

YWCA

Lani Tisdale

Toledo



# Community Meeting Sign In Sheet

Location: MOTT BRANCH

Date: 1/8/25

Name / Nombre

Neighborhood / Vecindario

Max Piasecki

Reynolds corner

Nichole Nauden

Scott Park

Lisa Halvey (woma of Toledo)

Bancroft Hills

Ford Weber

Old Orchard/Junction

MARLON BARBOUR

city park

Monica L. Smith

Tilby

Malcolm Cunningham

old orchard

Diana Gambell

43609

Alexia Sims

Junction 43609

Christian Simpson

Edwards M. Adams Jr.

SOC

Gary Auerbach

Toledo City Council

Cassandra McPherson

tol. City Council

Veronica Scnders

Ch W

## Community Meeting Sign In Sheet

Location: Mott Branch Library Date: 1/08/2025

**Name / Nombre**

Neighborhood / Vecindario

LoTrina Smith

Hill Ave

#1

Mott Library

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing		7
Community Health Programs and Services		0
Drug and Alcohol Addiction Treatment		2
Home Repair Program		5
Investments in Education		2
Jobs and Economic Development		6
Mental Health Services		2
Parks / Playgrounds Sports / Recreation		1
Programs for Children Youth and Teens		4


Programs for People with Physical Disabilities		0
Programs for People with Developmental Disabilities		0
Public Safety Crime Prevention		3
Senior Services and Programs		0
Services for the Homeless		2
Services for Victims of Domestic Violence		2
Street and Sidewalk Improvements		4
Workforce Development Skills Training		5








#12

Mott Library

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing		4
Community Health Programs and Services		1
Drug and Alcohol Addiction Treatment		0
Home Repair Program		6
Investments in Education		0
Jobs and Economic Development		4
Mental Health Services		3
Parks / Playgrounds Sports / Recreation		2
Programs for Children Youth and Teens		5






Programs for People with Physical Disabilities		0
Programs for People with Developmental Disabilities		0
Public Safety Crime Prevention		4
Senior Services and Programs		0
Services for the Homeless		2
Services for Victims of Domestic Violence		1
Street and Sidewalk Improvements		2
Workforce Development Skills Training		1



3 Met Library

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing		6
Community Health Programs and Services		0
Drug and Alcohol Addiction Treatment		0
Home Repair Program		5
Investments in Education		0
Jobs and Economic Development		2
Mental Health Services		2
Parks / Playgrounds Sports / Recreation		0
Programs for Children Youth and Teens		2



















Programs for People with Physical Disabilities		0
Programs for People with Developmental Disabilities		0
Public Safety Crime Prevention		3
Senior Services and Programs		1
Services for the Homeless		2
Services for Victims of Domestic Violence		1
Street and Sidewalk Improvements		0
Workforce Development Skills Training		1



c/ Mt. Library

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	  	3
Community Health Programs and Services		0
Drug and Alcohol Addiction Treatment		0
Home Repair Program	   	4
Investments in Education		0
Jobs and Economic Development	   	4
Mental Health Services	   	4
Parks / Playgrounds Sports / Recreation	  	3
Programs for Children Youth and Teens	   	4

Programs for People with Physical Disabilities		1
Programs for People with Developmental Disabilities	 	2
Public Safety Crime Prevention		1
Senior Services and Programs	   	4
Services for the Homeless		0
Services for Victims of Domestic Violence		0
Street and Sidewalk Improvements	   	4
Workforce Development Skills Training	     	6



















5

Mott Library

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY



Affordable Housing	    	5
Community Health Programs and Services		0
Drug and Alcohol Addiction Treatment		1
Home Repair Program	 	2
Investments in Education		1
Jobs and Economic Development	 	2
Mental Health Services	 	2
Parks / Playgrounds Sports / Recreation		1
Programs for Children Youth and Teens	    	5









Programs for People with Physical Disabilities		0
Programs for People with Developmental Disabilities		0
Public Safety Crime Prevention	 	2
Senior Services and Programs		1
Services for the Homeless	     	6
Services for Victims of Domestic Violence		1
Street and Sidewalk Improvements	 	2
Workforce Development Skills Training	 	2
SLUM + BLIGHT	 	2



6 Math Library

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing		4	8
Community Health Programs and Services		1	1
Drug and Alcohol Addiction Treatment		1	8
Home Repair Program		0	0
Investments in Education		6	6
Jobs and Economic Development		5	4
Mental Health Services		2	7
Parks / Playgrounds Sports / Recreation		0	0
Programs for Children Youth and Teens		5	5

Programs for People with Physical Disabilities		1	1
Programs for People with Developmental Disabilities		3	3
Public Safety Crime Prevention		2	4
Senior Services and Programs		3	3
Services for the Homeless		1	1
Services for Victims of Domestic Violence		2	2
Street and Sidewalk Improvements		1	1
Workforce Development Skills Training		3	3








7

Moth Library

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing		1
Community Health Programs and Services		0
Drug and Alcohol Addiction Treatment		0
Home Repair Program		8
Investments in Education		2
Jobs and Economic Development		0
Mental Health Services		1
Parks / Playgrounds Sports / Recreation		2
Programs for Children Youth and Teens		2

Programs for People with Physical Disabilities		0
Programs for People with Developmental Disabilities		1
Public Safety Crime Prevention		0
Senior Services and Programs		3
Services for the Homeless		2
Services for Victims of Domestic Violence		0
Street and Sidewalk Improvements		0
Workforce Development Skills Training		2
Mental Health Groups		11





Mt. Liberty

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	      	7
Community Health Programs and Services		0
Drug and Alcohol Addiction Treatment		0
Home Repair Program	    	5
Investments in Education		1
Jobs and Economic Development		0
Mental Health Services		1
Parks / Playgrounds Sports / Recreation		0
Programs for Children Youth and Teens	    	5







Programs for People with Physical Disabilities		0
Programs for People with Developmental Disabilities		0
Public Safety Crime Prevention		1
Senior Services and Programs		0
Services for the Homeless		0
Services for Victims of Domestic Violence		1
Street and Sidewalk Improvements	  	3
Workforce Development Skills Training		1

	Table 1	Table 2	Table 3	Table 4	Table 5	Table 6	Table 7	Table 8	Total
Affordable Housing	7	4	6	3	5	4	1	7	37
Community Health Programs and Services	0	1	0	0	0	1	0	0	2
Drug and Alcohol Addiction Treatment	2	0	0	0	1	1	0	0	4
Home Repair Program	5	6	5	4	2	0	8	5	35
Investments in Education	2	0	0	0	1	6	2	1	12
Jobs and Economic Development	6	4	2	4	2	5	0	0	23
Mental Health Group Homes							11		11
Mental Health Services	2	3	2	4	2	2	1	1	17
Parks / Playgrounds / Sports / Recreation	1	2	0	3	1	0	2	0	9
Programs for Children Youth and Teens	4	5	2	4	5	5	2	5	32
Programs for People with Developmental Disabilities	0	0	0	2	0	3	1	0	6
Programs for People with Physical Disabilities	0	0	0	1	0	1	0	0	2
Public Safety / Crime Prevention	3	4	3	1	2	2	0	1	16
Senior Services and Programs	0	0	1	4	1	3	3	0	12
Services for the Homeless	2	2	2	0	6	1	2	0	15
Services for Victims of Domestic Violence	2	1	1	0	1	2	0	1	8
Slum and Blight					2				2
Street and Sidewalk Improvements	4	2	0	4	2	1	0	3	16
Workforce Development / Skills Training	5	1	1	6	2	3	2	1	21



# Mot Affordable HOUSING

Lower restrictions  
on building  
companies wanting  
to build  
(Affordable Housing)

Housing for  
larger  
Families

Housing  
improving where  
we live at a  
cost that we  
can afford. Build  
more apartments  
for seniors, youth  
families, 18-25  
and singles

Slum & BLIGHT  
DEMOLITION  
Zurich Bank  
Private Demolition  
Companies

Work better with  
investors on  
buying city homes

AH

~~Found~~  
Foundation  
Repair

~~Electric~~  
Utility  
Upgrade

Residential  
Street  
Repair

Re-vitalize  
Alleysways

Upgrade  
Property

Robert  
Renovate

Affordable rent  
more  
consider gap/income  
based housing

Lower restrictions  
on buying & renovation  
homes

Multifamily  
Homes

Afford  
Homes

new affordable  
housing  
construction  
w/in city limits

A.H.  
better Job's  
Achieving  
older  
Homes

Demolition  
of housing

Tear  
Down  
Vacant/  
blight  
Property

Affordable  
Home Ownership

DEMOLITION of  
MARGINAL to  
CONDEMNED  
HOUSING

Homeownership  
OFFER Mortgage  
classes  
offer mortgage technical assistance  
528p Mortgage Fund  
being raised when  
the borrower used  
to be the mortgage  
owner & not  
investor

Build  
Tiny homes

Afford



# Mott Affordable Housing

Affordable Housing Solutions  
Repurpose Buildings

RENOVATION OF EXISTING HOUSING STOCK

Affordable Housing  
Rehab homes for sale at lower market rates.

programs to encourage owner-occupancy reclaim poorly maintained rental housing

1. Limit out size of state investments in Affordable Housing

RESTRICTING SALE OF HOUSING TO OUT-OF-STATE INVESTORS

RENT-TO-OWN PROGRAMS

Rehabilitation of existing housing

Affordable Housing  
Limit the number of homes out of state investors can purchase / have stricter punishments for property neglect

Affordable Housing  
tutoring programs for children and adults

1st time homebuyer education for individuals not affiliated with LMH

Keep housing local many out of state companies buy up properties and then do not maintain which can evolve into blight.

Affordable Housing  
Classes towards achieving ownership with a down payment bank for successful completions

Affordable Housing  
After purchase program  
program for further guidance in maintaining successful ownership

INCENTIVIZE LANDLORDS THAT RENT TO LOW INCOME FAMILIES (AFFORDABLE HOUSING)

Grant to fund gap b/t house cost & RMV

build homes in vacant lots

Take foreclosed homes faster so vacant houses don't sit for long

Tax Abatement

Home Ownership Opportunities  
Down Payment Assistance

Financial literacy / credit repair courses (free)

HAVE AGREEMENTS IN SLOW GARDENS THAT ARE REASONABLE IN MONTHLY RATES

rent to own program

low income

Fix the Abandoned Homes

Affordable Housing  
Rent to Own

NEW HOUSING  
AFFORDABLE BUILD MORE  
MAINTAIN ROADS STREETS  
SIDEWALKS INVESTMENT IN THE BLACK COMMUNITY

AFFORDABLE HOUSING IN THE RAISE  
GRANT NEIGHBORHOODS

How City Can  
Blight  
Tearing down new home owners

New housing with in walking distance of schools.  
(Affordable Housing)

New housing close to public transportation.  
(Affordable Housing)

PLANNED COMMUNITY DEVELOPMENTS IN AREAS WHERE MOST HOUSING IS NO LONGER VIABLE

-For affordable housing:  
Not only increase the availability of it, but have in place assistance and resources to help people obtain affordable housing.

This City Torn down  
Some of the affordable housing. Rebuild New Affordable Family Single Units close to Public transportation Grocery stores. Had Landlords accept this model for how they manage property

Reasonable  
Rents  
Bills

Make lot with  
Parks or youth center

Affordable Housing  
Rehabilitation of existing housing



MoH

# Home Repair

D.S. Y. CLASSES

Foot  
- For home repairs  
increase grant/aid  
assistance in order for  
home owners, especially  
senior home owners, to have  
older homes repaired.

## HOME REPAIR

TOOL LENDING  
LIBRARY  
WORKSHOPS ON  
HOME REPAIRS

## LANDSCAPE IMPROVEMENT PROGRAM

## RESIDENTIAL FACADE PROGRAM

## RENOVATION OF EXISTING HOUSING STOCK

## Education

- Low interest  
- Loans

## SHARING KITCHEN SPACE SOURCES

Incentives for  
landlords to  
invest in energy-  
efficient upgrades  
and insulation

Home repair

GRANTS FOR  
HOME OWNERS  
TO IMPROVE  
EXTERIOR LIGHT  
(HOME REPAIR)

FOR SENIORS  
Windows, doors  
Painting, roofs  
Painting, doors  
Painting

Home  
Paint/roof repair

Streamline  
processes for  
elderly to get  
free or low cost  
assistance for  
home repairs &  
upgrades for now  
being disabled.

## Home Repair Roofing

## REHABILITATE HOUSES STANDING

Comm. Program  
Greater  
Social security  
assistance for  
elderly SSI  
SSI recipients  
and utility assistance.

## Home Repair

\*Contractors willing  
to do Pro bone  
Jobs.

\*Grants Strictly to  
fix Roofs.

## 2 New Roofs

CONTINUE TEARING  
DOWN HOMES  
BEYOND REPAIR  
(HOME REPAIR)

Grant programs  
for exterior  
run down homes  
(unoccupied)  
H.R.

Have programs  
that help people  
connect with  
affordable repair  
solutions.

## FOUNDATIONS

Home Repair  
Grants to help seniors  
& low income repair  
structures like roofs,  
foundations, windows, doors,  
and other.

"Painting  
Sliding on home  
tip up  
home in neighbor

Grants for  
home improvements  
for home buyers

H.R.

## Window Assistance

## Lead Testing

## HVAC Assistance

## Foundation Repair

## Fencing

## Windows

## Roof Replacement

H.R.  
Grants for Home  
owners to  
help pay for  
repairs

## Foundation Repair

## Lead Abatement

## Home Repair Code Compliance

## TOUCH BACK TAX CREDIT PROGRAM

## Home Repair More Funding

Home Repairs:  
Clean Up Slum  
Properties

Hold Landlords  
Accountable

Continued  
Lead abatement

Vacant property  
clean-up/  
development

roof repairs  
&  
housing  
weatherization

Reappropriate funds  
special tax on properties  
to help fund home  
repair and upkeep for  
blighted properties

& potential wasted \$

Each neighborhood  
on the list should  
have one major  
development to their  
communities. Visible  
progress each year.  
(Home repair)

Home Repair  
more programs  
geared towards  
foundation repair

Repair the Streets teams  
and it will improve  
foundations

LOW-INTEREST  
LOANS TO LOW-INCOME  
HOMEOWNERS



Mott

# Youth Programs

CHARACTER  
DEVELOPMENT  
PROGRAM IN  
PUBLIC + PRIVATE  
SCHOOLS

Youth Job  
development

-For Children's Programs  
increase safety efforts

Summer activities  
for toddlers  
and preschoolers

Laser Daycare  
Cost for Single  
mothers + Father  
or offer them day  
care pay them  
state or local  
the state

Year around  
Youth Programs  
Access to  
Technical  
Training

Mandatory  
Civil Work  
force for  
minors

Youth Program  
at school  
after school  
• Clubs to improve learning  
math, science, writing  
reading

Collect  
w/ Youth  
Org

Youth Programs  
Every neighborhood  
should have after school  
Programs and tutoring

After  
School  
program

PARENT/TEEN  
CLASSES ON  
GOAL SETTING,  
FINANCIAL MGT

Programs for  
kids 1-5

Transportation  
for programs

Upgrade  
pools to be  
like new pool  
locations in city  
w/ splash pads  
kids' recreation  
area

Job creation  
programs  
for younger  
people!  
Get them off streets

Community  
re-installing train  
programs in high  
schools, etc,  
training centers

Trade programs  
for youth

Summer  
education

After School  
kids that is  
no longer in  
school

Quality youth  
summer programs  
that would serve  
as childcare option  
for working parents

More STEM  
in TPS

Youth Programs  
Summer Programs

Job  
Shadowing

Mentorship

Program for  
kids  
that is less  
future

4th  
teen's Job  
After School  
Programs  
help the  
kids

Transportation  
to/from the  
Programs  
youth

Programs that  
last longer than  
a month

Safety Programs

Summer  
jobs/  
interns

Transportation  
to colleges  
and  
universities

more youth  
employment/  
apprentice  
programs

Summer Employment  
for youth

Youth Job  
opportunities

Shovel snow  
mow lawns  
Paint Houses  
Fix Homes  
Learn a skill  
and get paid

Bring  
Back  
PIC

Meaningful programs  
for youth to help  
them navigate  
basic life skills  
(Youth Programs)

Youth programs  
more city youth  
sports teams  
(soccer, tennis)

Affordable Daycare

more  
sports  
programs

Youth services program  
Summer Youth  
Program w/ A  
Penta theme

Build Youth Programs  
to encourage future  
positions/career develop-  
ment. Gardens/community  
involvement; grow civic  
engagement: Boy Scouts  
Girl Scouts  
Kid Mayor  
Boys & Girls Club  
TEAMS YP

Need for Affordable  
Youth Programming  
can follow suite to  
child care needs and  
giving children activities  
YP

Making for extra  
programs / projects  
that are fun for  
youth. These should be  
made out.



# Mott Jobs + Econ Dev.

→ Increase

Increase Funding  
opportunities for  
small businesses  
so we aren't  
competing for  
grants w/ larger  
nonprofits & businesses

TRAINING TO  
PREPARE TEENS  
FOR WORK IN  
TRADES

Increase opportunities  
for at-home  
business to rent  
spaces affordably  
for growth  
or much unoccupied  
spaces

4. Grants/Funds  
&  
Contract 4  
Small Bus.

Jobs+Econ Dev  
Recruitment

Provide tax breaks  
or incentives for  
corporations to  
expand to Toledo.  
(Jobs & Econ Dev)

INCENTIVIZE  
RESIDENTS TO  
TAKE FINANCIAL  
LITERACY CLASSES  
(ECON DEVELOP)

-For jobs, bring  
back more training and  
development programs  
in order for displaced and  
laid off workers to become  
more digitally confident and  
keep training with programs

Jobs & Education  
Shift Education  
Certificate Program  
early childhood education

J.P.  
Need Higher  
paying job  
(4)

Jobs/Economic Development  
Small Business Recruitment  
in underserved  
community

offer start ups  
a business loan  
advantage showcase  
Toledo as a hub  
for business development  
-Tech Companies  
-Food/Restaurant  
-Green initiatives  
J&D

Provide more opportunities  
to connect with agencies  
that provide assistance  
opportunities for entrepreneurs  
professionals / leaders  
in-person and virtual

Get with  
Skill trades  
and Deaf/Deafblind homes  
and people that  
want to learn a  
trade to get to  
get Abandon Homes  
up to code

Bring Grocery  
Stores  
Back

Job + Plan new  
Establish worker  
cooperatives  
where workers  
are owners  
Proven to be pos  
for communities

COLLABORATION  
WITH AREA EMPLOYERS  
RE: EDUCATIONAL  
PATHWAYS TO VALUED  
WORK SKILLS

more business  
development on  
main streets

Homeless Svs  
Direct int-situations:  
• Mental/  
physically  
challenged  
Resource for  
homeless/low  
income.  
Transitional  
homeless  
housing for  
waiting  
receipts.



Mott

# Work force Development Skills

Inclusive  
Job training

For workforce development,  
increase re-training +  
re-entry efforts to help  
lead off workers adjust  
to today's work  
environments.

Lucas  
County  
Trade School

Mentorship  
programs for  
young workers +  
entrepreneurs  
Workforce

W.F.  
Training's  
and Skills  
Development  
Adult in Heart

Expand  
Police Staff  
with more  
minorities. Focus  
on sensitivity  
training.

Jobs & workforce Development  
Certificate Programs  
for Skill task  
jobs.  
at little to no  
cost for the  
income.

Workforce Development  
Skills  
More Types Available

Jobs.  
Training @ High School  
Level

CONSTRUCTION  
SKILLS

Job Training  
Internship program  
that leads to  
employment

Soft Skills  
Development  
Workforce

Workforce Dev Skills  
Partner with OSC  
Incentive for acc.  
to open a Toledo  
Location

Great inclusion  
is model school  
programs  
Toledo Tech  
Aviation school  
Natural Science  
gear more training  
programs to career  
development WFT

tech (i.e. AI)  
training

Offer program at  
Overing Street Mission  
for skills training  
to accommodate more  
people + market  
the program

Training program  
and partnering with  
Local businesses to provide  
jobs.

Workforce Development  
Youth Education program  
with mentor requirement

Online Cert  
Programs  
like  
Bedford

Open courses at Asha  
for adults at a  
low cost.



## Infra structure

- SCHOOLS/  
GROCERY STORE/  
Bank/Laundry  
- Mat

## Infrastructure

- Fix inner city  
sidewalks esp.  
those in older  
est. neighborhoods  
& by schools!

# Community Meeting Sign In Sheet

Location: ETFC

Date: 1/9/2025

Name / Nombre

Neighborhood / Vecindario

Manuel Muthis

East Toledo

Dawn Newton

EAST TOLEDO

DAVID ZOGNO

EAST TO

Diric Kramer

NTR

Michael Sachs

NTR

Tina Hall

Englewood

CHERIE CONLEY

SCOTT PARK

Belinda Stride

Beverly

GARY LENHART

EAST Toledo ONE VOICE

Basia Gawin

representing  
Ottawa NTR

Marybel Contreras

East Toledo

Consuelo Snow

East Toledo

Mary Anne Cullum

South Toledo

Jodie L. Summers

WARD CHAIR 18

TOMIA Duran

south end



# Community Meeting Sign In Sheet

Location: ETFC

Date: 1/9/2025

Name / Nombre

Neighborhood / Vecindario

Rafael Nieto

Toledo Lucas

Laya Layte

Toledo Lucas

Erin Kramer

Hesterdowns

Monica L. Smith

C.O.T.

Coleena Ali

COT

George Savantou

Toledo City Council

Tabatha Thomas

TOLEDO, LUCAS

Mary E. Wilson






Toledo - Ironwood Area

MARY FRANK

TOLEDO

① ET










PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	
Community Health Programs and Services	
Drug and Alcohol Addiction Treatment	
Home Repair Program	
Jobs and Economic Development	
Mental Health Services	
Parks / Playgrounds	
Sports / Recreation	
Programs for Children	
Youth and Teens	
Programs for People with Physical Disabilities	
Programs for People with Developmental Disabilities	
Public Safety	
Crime Prevention	
Senior Services and Programs	
Services for the Homeless	
Services for Victims of Domestic Violence	
Street and Sidewalk Improvements	
Workforce Development	
Skills Training	



ET ②

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	
Community Health Programs and Services	
Drug and Alcohol Addiction Treatment	
Home Repair Program	
Jobs and Economic Development	
Mental Health Services	
Parks / Playgrounds	
Sports / Recreation	
Programs for Children	
Youth and Teens	
Programs for People with Physical Disabilities	
Programs for People with Developmental Disabilities	
Public Safety	
Crime Prevention	
Senior Services and Programs	
Services for the Homeless	
Services for Victims of Domestic Violence	
Street and Sidewalk Improvements	
Workforce Development	
Skills Training	
Translation Services	
Blight Removal	

ET

3






PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	
Community Health Programs and Services	
Drug and Alcohol Addiction Treatment	
Home Repair Program	
Jobs and Economic Development	
Mental Health Services	
Parks / Playgrounds	
Sports / Recreation	
Programs for Children Youth and Teens	
Programs for People with Physical Disabilities	
Programs for People with Developmental Disabilities	
Public Safety	
Crime Prevention	
Senior Services and Programs	
Services for the Homeless	
Services for Victims of Domestic Violence	
Street and Sidewalk Improvements	
Workforce Development Skills Training	



























ET ④

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing				3
Community Health Programs and Services				
Drug and Alcohol Addiction Treatment				
Home Repair Program				2
Jobs and Economic Development				
Mental Health Services				
Parks / Playgrounds				
Sports / Recreation				
Programs for Children Youth and Teens				
Programs for People with Physical Disabilities				
Programs for People with Developmental Disabilities				
Public Safety				
Crime Prevention				
Senior Services and Programs				
Services for the Homeless				
Services for Victims of Domestic Violence				
Street and Sidewalk Improvements				
Workforce Development				
Skills Training				

ET 8
















PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	 	2
Community Health Programs and Services		1
Drug and Alcohol Addiction Treatment	 	1
Home Repair Program	  	2
Jobs and Economic Development	 	4
Mental Health Services		0
Parks / Playgrounds Sports / Recreation		0
Programs for Children Youth and Teens	 	2
Programs for People with Physical Disabilities		0
Programs for People with Developmental Disabilities		0
Public Safety Crime Prevention	  	3
Senior Services and Programs	 	1
Services for the Homeless	 	4
Services for Victims of Domestic Violence		0
Street and Sidewalk Improvements	   	4
Workforce Development Skills Training		1



ET 6

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing				3
Community Health Programs and Services				
Drug and Alcohol Addiction Treatment				
Home Repair Program				2
Jobs and Economic Development				1
Mental Health Services				
Parks / Playgrounds				
Sports / Recreation				
Programs for Children Youth and Teens				2
Programs for People with Physical Disabilities				
Programs for People with Developmental Disabilities				1
Public Safety				1
Crime Prevention				
Senior Services and Programs				
Services for the Homeless				1
Services for Victims of Domestic Violence				1
Street and Sidewalk Improvements				1
Workforce Development Skills Training				1

E.T. ②

PLEASE PLACE ONE DOT NEXT TO EACH OF THE MOST IMPORTANT ISSUES IN YOUR COMMUNITY

Affordable Housing	
Community Health Programs and Services	
Drug and Alcohol Addiction Treatment	
Home Repair Program	
Jobs and Economic Development	5
Mental Health Services	0
Parks / Playgrounds Sports / Recreation	1
Programs for Children Youth and Teens	5
Programs for People with Physical Disabilities	0
Programs for People with Developmental Disabilities	0
Public Safety Crime Prevention	3
Senior Services and Programs	0
Services for the Homeless	0
Services for Victims of Domestic Violence	0
Street and Sidewalk Improvements	1
Workforce Development Skills Training	4
CITY BEAUTIFICATION TREES	1



	Table 1	Table 2	Table 3	Table 4	Table 5	Table 6	Table 7	Total
Affordable Housing		3	4	3	2	3		15
Jobs and Economic Development		1	3		4	1	5	14
Programs for Children Youth and Teens	1		2		2	2	5	12
Home Repair Program	1	3	1	2	2	2		11
Public Safety / Crime Prevention	2	1			3	1	3	10
Street and Sidewalk Improvements		4			4	1	1	10
Workforce Development / Skills Training		2	2		1	1	4	10
Community Health Programs and Services		2	2		1			5
Services for Victims of Domestic Violence					4	1		5
Drug and Alcohol Addiction Treatment			2		1			3
Mental Health Services			2					2
Parks / Playgrounds / Sports / Recreation	1						1	2
Programs for People with Developmental Disabilities			1			1		2
Services for the Homeless			1			1		2
Slum and Blight		2						2
Senior Services and Programs					1			1
Mental Health Group Homes								0
Programs for People with Physical Disabilities								0
Translation			2					2
Trees							1	1

# WORK FORCE DEVELOPMENT

---

10

East  
Toledo

Small Bus  
Contracts &  
Funding

Increase Training  
opportunities for  
recent High School  
Graduates looking  
to enter the  
Construction  
Industry

Have programs  
for jobs  
for felons



# AFFORDABLE HOUSING

① 15

East  
Toledo

Variety of  
affordable  
housing  
townhouse  
condo  
homes

blight remediation

Homeowner -  
Ship  
Help

Repeal Project  
Labor Agreement  
Requirement to  
make developing  
affordable housing  
cost - reasonable  
again

WE NEED HOUSING  
FOR LARGER FAMILIES  
AND EXTENDED  
FAMILIES  
WITH SPACE FROM  
NEIGHBORS -  
MAY INCREASE PER  
HOUSE

Rent houses before  
they become aban-  
doned and torn  
down

there

- Retention of  
Affordable Housing  
- Making sure both  
single-family &  
multi-family projects  
if previous investment  
stay affordable  
After 15 year  
compliance period  
is over.

LOWER PRICE  
ON HOUSING  
PROGRAM

HELP W/  
DOWN PAYMENT  
ON HOUSING  
OWNERSHIP

Toledo residents  
owner occupied  
proper buyers  
prioritized in  
home sales

local rather than  
out of state  
landlords for  
rentals?

Affordable  
Housing  
Home ownership  
DIY work  
shops

Increase Tax  
foreclosure on  
abandoned  
properties for  
sale in open  
market for  
redevelopment



11  
ETL

# HOME REPAIR ②

Sliding scale  
for housing  
repair —

Removal  
of blight

ACTION AGAINST  
LANDLORDS - not  
keeping up houses

REPAIR EXISTING  
HOUSES!

Help w/  
Repair  
Homes

Allocate funding to  
organizations already  
doing the work like  
Habitat for Humanity  
and NeighborWorks

improved home repair  
matching grants

FINANCIAL HELP  
FOR PEOPLE OVER  
50 YRS. OLD  
FOR HOME  
REPAIR

Home Repair  
Non-Income  
Based  
rent owner  
occupied programs

HELPING  
SENIORS with  
Home Repairs



# ⑫ ETFC YOUTH PROGRAMS

Job Shadowing  
and  
Mentorship

Preventative  
Youth  
Help

Advertise  
Youth  
programs  
more

Access to School  
Like parent  
for Toledo Public  
Schools.

Youth  
~~Financial~~  
Financial  
Programs

on email and  
opportunities - more  
internships, career  
guiding programs

More STEM  
IN TPS

Programs  
in summers  
for children.

Youth  
Services  
Preventative  
Programs

Youth Programming  
↓ Turn Off  
Wifi → Go  
OUTSIDE  
FOR A WALK  
IT'S FREE

Summer  
Neighborhood  
Youth  
Programs

TEACHING  
STUDENTS  
A TRADE  
(WELDING -  
ELECTRICAL  
PIPE FITTING)



# ①④ ECON DEV ET&C

Econ  
Dev  
Tax abatement +  
Tax credits

Vocational  
School IN  
Lucas Cty

Better  
paying  
Jobs

Incentives to bring  
small businesses back  
to main roads  
- often  
- La Grange  
- Sylvan Ave

Support  
small  
businesses  
so they <sup>success</sup>  
can be <sub>profit</sub>



# 10 ETFLPUB SAFETY

Public Safety  
Police  
engagements  
we going to  
schools to get  
to know young  
students

MORE  
SURVEILLANCE  
FOR PUBLIC  
SAFETY

Community  
gardening, yard  
clean up, lighting  
when shot spotters  
are being removed

more community  
meets + greets,  
block parties



10  
E/F/L

# STREETS + SIDEWALKS

Clean up vacant  
lots + community  
gardening

Neighborhood  
Beautification  
More Trees

Better lighting in  
neighborhoods



# Citizen Participation Plan

**CITY OF TOLEDO**  
**DEPARTMENT OF NEIGHBORHOODS**  
FOR  
THE U. S. DEPARTMENT OF HOUSING  
AND  
URBAN DEVELOPMENT PROGRAMS

**Wade Kapszukiewicz, Mayor**  
**Rosalyn Clemens, Director**  
One Government Center, Suite 1800  
Toledo, Ohio 43604

Office: (419) 245-1400

Fax: (419) 245-1192

<https://toledo.oh.gov/>



*Amended June 2020*





**City of Toledo**  
**Department of Neighborhoods**

Rosalyn Clemens, Director

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One Government Center, Suite 1800 • Toledo, Ohio 43604 | Fax (419) 245-1192 | Web: [toledo.oh.gov/services/neighborhood-and-business-development](http://toledo.oh.gov/services/neighborhood-and-business-development)

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**Citizen Participation Plan Updates**  
**Summary**  
**June 2020**

**NOTE:** This is a summary of the changes on the following pages. The new updates are highlighted for the ease of review.

Page 3	Added language specifically in reference to the COVID-19 funding response with a HUD waiver to provide for a 5 day review/comment period.
Page 3	Added language specifically in reference to the statutory suspensions and regulatory waivers to HOME for participating jurisdictions.
Page 3	Added language specifically in reference to waivers for Disaster Recover and Emergency Response.
Page 5	Added a paragraph to allow for virtual hearings in the event federal, state or local authorities recommend social distancing.
Page 5	Added language specifically in reference to the COVID-19 funding response with a HUD waiver to provide for a 5 day review/comment period.
Pages 8-9	Added language for the Citizen Participation requirements in the event of a disaster/emergency.
Page 10	Added language to the Urgent Need section and describes activities the city could take to address an event.
Page 10	Administrative Updates – this section was added to allow for grammatical or structural edits that do not substantially change the scope of meaning along with coding or eligibility determination of a project that does not change scope, location or beneficiaries.

**CITY OF TOLEDO  
CITIZEN PARTICIPATION PLAN**

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# **CITY OF TOLEDO**

## **CITIZEN PARTICIPATION PLAN**

### **INTRODUCTION**

The City of Toledo, as a participating jurisdiction and U. S. Department of Housing and Urban Development (**HUD**) entitlement recipient is required to have and implement a Citizen Participation Plan (**CPP**) for HUD-funded programs.

The plan sets forth policies and procedures for citizen involvement in the development of the Five-Year Consolidated Plan (**CONPLAN**), Annual Action Plan, any substantial amendment and the Consolidated Annual Performance and Evaluation Report (**CAPER**) as required by HUD, 24 CFR Part 91.105, Subpart B.

The Department of Neighborhoods is the agent for the City of Toledo to implement all aspects of the Citizen Participation Plan. Implementation will be accomplished through consultation and direct citizen participation.

In preparing the Consolidated Plan and the Annual Action Plan, the Department of Neighborhoods will consult with citizens, public and private agencies, organizations, state and other local government jurisdictions, the public housing authority, the local Continuum of Care (**CoC**), the local Fair Housing Center and other entities as appropriate.

### **PURPOSE AND INTENT**

Citizen participation is an integral part of the overall planning, evaluation, assessment and implementation process of the City of Toledo's Community Development Block Grant (**CDBG**), HOME Investment Partnerships Program (**HOME**), Emergency Solutions Grants (**ESG**) Program and any other applicable HUD grants. In order for the City to access these resources, it must prepare and submit a Consolidated Plan, Annual Action Plans and CAPER. These reports are developed using input from citizens, community agencies and beneficiaries.

The purpose of the plan is to provide citizens and beneficiaries with the information and mechanisms to allow them to fully participate at all levels of the City's Consolidated Plan, Annual Action Plan and CAPER processes. The City of Toledo recognizes the importance of citizen participation and fully endorses citizen involvement in its housing and community development activities.

The Citizen Participation Plan will allow the City of Toledo to:

- Work in concert with the Citizens Review Committee (**CRC**) and Internal Review Committee (**IRC**), comprised of volunteers and city-appointed community representatives.
- Provide citizens an opportunity to participate in the development of all Community Planning and Development (**CPD**) programs, set priorities, establish goals and comment on performance.
- Encourage the submission of comments and proposals (*particularly by low- and moderate-income residents including public housing residents; persons with disabilities and non-English speaking persons*).



- Provide for timely responses to proposals and comments submitted.
- Schedule meetings and public hearings (*in-person or virtual*) at times and locations that permit broad participation and attendance.
- Provide complete information regarding the City's CDBG, HOME, ESG and any other applicable HUD grants, relevant legislation and regulations, and other materials and documents as needed or requested to ensure knowledgeable citizen involvement.

It is the intent of this Citizen Participation Plan (*CPP*) that all citizen participation be conducted in an open manner with freedom of access for all interested persons.

## **PUBLIC COMMENT PERIODS**

Before adoption of the Consolidated Plan, Annual Action Plan, CAPER and any substantial amendments, the Department of Neighborhoods will make available to citizens, public agencies and other interested parties information that includes at least the following:

- Amount of assistance the City expects to receive (*including HUD entitlement grant funds and program income*);
- Range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.

The City of Toledo, in order to ensure that the public has the ability to comment on its various plans, adheres to the following implemented policies and principles:

***Consolidated Plan:*** Any interested party or individual has **thirty (30) days** to comment on the Five-Year Consolidated Plan before its submission to HUD. Notices for the comment periods will be published in the local general circulation newspaper and two local minority periodicals at least **fifteen (15) days** in advance of the comment period. Information will also be available on the City of Toledo's website and disseminated to subrecipients of HUD funding and key local service providers to reach a broader audience. News releases and Public Service Announcements will be sent to local media announcing the comment period and location of draft copies. Social media may be also used to disseminate information related to the comment period. A summary of all comments will be included within the final Consolidated Plan submitted to HUD. All comments will be accepted.

***Annual Action Plan:*** Any interested party or individual has **thirty (30) days** to comment on the annual Action Plan before its submission to HUD. At least **fifteen (15) days** in advance of the comment period, notices for the comment periods will be published in the local general circulation newspaper and two local minority periodicals. Information will also be available on the City of Toledo's website and disseminated to subrecipients of HUD funding and key local service providers to reach a broader audience. News releases and Public Service Announcements will be sent to local media announcing the comment period and location of draft copies. Social media may be also used to disseminate information related to the comment period. A summary of all comments will be included within the final Annual Action Plan submitted to HUD. All comments will be accepted.

***CAPER:*** Any interested party or individual has **fifteen (15) days** to comment on the CAPER before its submission to HUD. Notices for the comment period will be published in the local general circulation newspaper and two local minority periodicals at least **fifteen (15) days** in advance of the comment period. Information will also be available on the City of Toledo's

website and disseminated to subrecipients of HUD funding and key local service providers to reach a broader audience. News releases and Public Service Announcements will be sent to local media announcing the comment period and location of draft copies. Social media may be also used to disseminate information related to the comment period. A summary of all comments received will be included within the final CAPER submitted to HUD. All comments will be accepted.

***Substantial Amendments:*** Any interested party or individual has **thirty (30) days** to comment on any substantial amendments to the Consolidated Plan or Action Plan before its submission to HUD, unless specifically waived by HUD. Notices for the comment periods will be published in the local general circulation newspaper and two local minority periodicals at least **fifteen (15) days** in advance of the comment period. Information will also be available on the City of Toledo's website and disseminated to subrecipients of HUD funding and key local service providers to reach a broader audience. News releases and Public Service Announcements will be sent to local media announcing the substantial amendment and location of draft copies containing the changes. Social media may be also used to disseminate information related to the comment period. A summary of all citizen comments will be included within any substantial amendment forwarded to HUD. All comments will be accepted.

**For CDBG-CV and ESG-CV funding for PY2019, PY2020 and future CDBG, ESG and HOME funding under the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, granted in response to COVID-19 health crisis, the city may provide a 5-day notice/comment period of a Substantial Amendment as allowed under a HUD waiver. This includes any new COVID-19 related activities proposed.**

***Statutory Suspensions and Regulatory Waivers to HOME Participating Jurisdictions***

In any instances of disaster recovery and emergency responses, the City of Toledo will implement the applicable HOME statutory suspensions and/or regulatory waivers issued by HUD.

***Waivers for Disaster Recovery and Emergency Response***

In any instances of disaster recovery or emergency responses, the City of Toledo will implement HUD waiver guidance pertaining to public notices, public review periods and public hearings in order to expeditiously deploy critical response funds.

## **PUBLIC HEARINGS**

***Consolidated Plan/Annual Action Plan:*** A minimum of two public hearings are held to obtain citizen views on the Consolidated Plan and the Annual Action Plan. For the Consolidated Plan, at least one of the hearings must be held before the proposed Consolidated Plan is published for comments. These public hearings also provide a forum for public comment on program performance, as well as an opportunity for citizens to make proposals and pose questions. Hearings are held toward the end of the workday for the convenience of those who work normal business hours, at a location convenient to beneficiaries and accessible to all persons. Additional reasonable accommodations will be provided upon request.

Notices for the public hearings will be published at least **fifteen (15) days** in advance of the hearings for the Consolidated Plan and Action Plan in the local newspaper and two local minority periodicals. The Public Notice will include:

- information related to requesting reasonable accommodations for persons with disabilities;
- a summary of the proposed plans describing the contents and purpose of the plans;
- a list of the locations or websites where copies of the entire proposed Consolidated Plan and Action Plans may be available, and;
- a method for citizen's response or questions, either through the internet or mail.

Written notice will be forwarded to the local public housing authority, announcing the date, time and location of the public hearings as well as to all subrecipients. All comments received at the public hearings will be accepted and noted as part of the final document.

For the Consolidated Plan, the City of Toledo may also provide focus groups, forums or other public meetings for citizens at various times and locations to allow for greater participation from beneficiaries and potential beneficiaries. These forums, focus groups or public meetings will address neighborhood and resident concerns and assist in the development of priorities for the City of Toledo's Five-Year Consolidated Plan. Notices of these open meetings will be published at least **fifteen (15) days** in advance in the local general circulation newspaper and two local minority periodicals. Information will also be available on the City of Toledo's website. Written notice will also be sent to all subrecipients. All notices will announce the dates, times and locations of these open meetings.

**CAPER:** A minimum of one public hearing is held to obtain citizen views on the CAPER. This public hearing provides a forum for public comment on program performance, as well as an opportunity for citizens to make proposals and pose questions. The hearing is held toward the end of the workday for the convenience of those who work normal business hours, at a location convenient to beneficiaries and accessible to all persons. Additional reasonable accommodations will be provided upon request.

Notices for the public hearing will be published at least **fifteen (15) days** in advance of the CAPER hearing in the local general circulation newspaper and two local minority periodicals. Written notice will be forwarded to the local public housing authority, announcing the date, time and location of the public hearings as well as to all subrecipients. All comments received at the public hearing will be accepted and noted as part of the final document submitted to HUD.

**Substantial Amendments:** Depending on the scope of the proposed amendment, a minimum of one public hearing may be held to obtain citizen comment on any substantial amendments to the Consolidated Plan/Annual Action Plan. (*See page 10 for definition of substantial amendment.*) The public hearing provides a forum for the public to express their opinions of the proposed changes before final submission to HUD. The hearing will be held toward the end of the workday for the convenience of those who work normal business hours, at a location convenient to beneficiaries and accessible to all persons. Additional reasonable accommodations will be provided upon request.

Notices for the public hearing will be published at least **fifteen (15) days** in advance of the hearing in the local general circulation newspaper and two local minority periodicals. Written notice will be forwarded to the local public housing authority and all subrecipients announcing the date, time and location of the public hearing. Information will also be available on the City of Toledo's website. All comments received at the public hearing will be accepted and noted within the final substantial amendment submitted to HUD.



**Virtual Public Hearings:** Virtual Public Hearings will only be used in lieu of in-person hearings if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.

The Virtual Public Hearings will be accessible to the public through live streaming, broadcasting on local radio, television, cable or public access channels, a teleconference or other similar electronic technology.

If virtual hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. In addition, appropriate notice and public comment will be provided.

**For CDBG-CV and ESG-CV funding for PY2019, PY2020 and future CDBG, ESG and HOME funding under the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, granted in response to COVID-19 health crisis, the city may provide a 5-day notice/comment period of a Substantial Amendment as allowed under a HUD waiver. This includes any new COVID-19 related activities proposed.**

## **AVAILABILITY OF INFORMATION**

The Department of Neighborhoods' staff members compile and prepare the draft and/or final copies of the Consolidated Plan, Annual Action Plan, CAPER and any Substantial Amendments. Upon completion of the draft or final copies, a distribution list of key local service providers is updated with the date, document title and name of the staff member delivering to the location. This document is kept on file.

Draft and final copies of the Consolidated Plan, Annual Action Plan, CAPER and any Substantial Amendments will be available to all citizens in digital form and in paper. Paper copies are available at One Government Center, and various locations or websites, including:

- Toledo-Lucas County Public Library (*available at the main branch and by request to all other branches*);
- Lucas Metropolitan Housing Authority;
- Fair Housing Center;
- Toledo Lucas County Homelessness Board and,
- Lucas County Board of Developmental Disabilities

Hours of viewing at One Government Center will be from 8 a.m. to 4 p.m., Monday through Friday and will be available in the Department of Neighborhoods and the Clerk of Council office.

Depending on the hours of operations, all plans are accessible throughout the work week and may be available at some location on weekends. Digital copies are always available through the City's website or the Toledo-Lucas County Public Library's website.

The above documents are considered public information with the exception of records that contain confidential information about individuals participating in or benefiting from the CDBG programs.

## **ACCESS TO RECORDS**

In accordance with Ohio state law, housing and community development records belonging to the City of Toledo are considered public information. Exceptions are records that contain confidential information about individuals participating in or benefiting from the CDBG, HOME, ESG programs. The Department of Neighborhoods will provide citizens, public agencies and other interested parties with reasonable and timely access to public records relating to their past use of CDBG, HOME, ESG and related assistance for the previous five years. This information shall be made available to interested parties as requested and be noticed as such.

## **PERSONS WITH DISABILITIES**

Public hearings and community meetings will be held at locations accessible to persons with restricted mobility. A sign-language interpreter will be available at public hearings and community meetings, if requested at least 72 hours in advance.

According to the Federal Communications Commission, a person with a hearing or speech disability can use the 711 dialing code for access to Telecommunications Relay Services (*TRS*). (*From City telephones, "9" needs to be dialed first -- "9711."*) TRS permits a person with a hearing or speech disability to use the telephone system via a text telephone (*TTY*) or other device to call persons with or without such disabilities. A list of the Ohio Relay Toll-Free Numbers is available at the Department of Neighborhoods' front office.

Department of Neighborhood staff is available to assist persons with hearing or speech disabilities by using written communication. Staff is also available to assist persons with a visual impairment by reading to them or providing large-print documents.

## **NON-ENGLISH SPEAKING PERSONS**

Interpreters will be made available for non-English speaking citizens at public hearings and community meetings, if requested at least 72 hours in advance. Inquiries for translated summary copies of the Consolidated Plan, Annual Action Plan, CAPER, and substantial amendments will be considered by contacting the Department of Neighborhoods at least three weeks in advance.

## **COMPLAINT PROCEDURES**

Oral or written complaints concerning the planning, implementation, or reporting of the Consolidated Plan, Annual Action Plan, CAPER, and substantial amendments should be submitted to the Director of the Department of Neighborhoods, One Government Center, Suite 1800, Toledo, OH 43604, (419) 245-1400. Acknowledgment of written complaints or concerns will be provided, as practical, within **fifteen (15) working days**. Any citizen may contact the Mayor or City Council to discuss problems not resolved at staff level.

## **DISPLACEMENT PROCEDURES**

The City of Toledo will comply with all federal regulations governing residential anti-displacement and relocation assistance as they pertain to all HUD-funded programs.

Specifically, the City of Toledo will comply with Section 104(d) of the Housing and Community Development Act of 1974 [42 U.S.C. 5304(d)] and 24 CFR Part 42 for its CDBG Program,

Section 108 Loan Guarantees Program, the Urban Development Action Grant Program, and HOME Program. In complying with the above:

- The City of Toledo will take steps to minimize the displacement of persons from their homes.
- The City of Toledo will provide relocation assistance to all low- to moderate-income (**LMI**) households displaced by activities assisted with applicable HUD funds.
- To the extent required under the provisions of 24 CFR Sec.42.375, the City will replace on a one-for-one-basis all occupied and vacant LMI dwelling units demolished or converted to a use other than LMI housing units as a direct result of activities assisted with funds under applicable HUD programs. (***Per 24 CFR Sec. 42.305, a dwelling unit is considered occupiable and vacant if it is: in standard condition; substandard condition but suitable for rehabilitation; or, in any condition and has been occupied for at least three months prior to the conversion or demolition.***)
- Pursuant to 24 CFR 42.375(c) and before entering into a contract committing the City of Toledo to provide funds for a project that will directly result in the demolition of lower-income dwelling units or the conversion of lower-income dwelling units to another use, the City will make public by publication in a newspaper of general circulation and submit to HUD the following information: a description of the proposed assisted activity; location on a map and number of dwelling units by size to be demolished or converted to a use other than for LMI dwelling units; a time schedule for the project; the location on a map and the number of dwelling units by size (***number of bedrooms***) that will be provided as replacement dwelling units; the source of funding and a time schedule for the provision of replacement dwelling units; the basis for concluding that each replacement dwelling unit will remain a lower-income dwelling unit for at least ten (**10**) years from the date of initial occupancy; and information demonstrating that any proposed replacement of dwelling units with smaller dwelling units is appropriate and consistent with the housing needs and priorities identified in the approved Consolidated Plan.

To the extent that the specific location of the replacement housing and other data in select items above are not available at the time of the general submission to HUD, the submission shall identify the general location of such housing on a map and the approximate number of dwelling units by size. Information identifying the specific location and number of units by size will be submitted to HUD and disclosed to the public as soon as it becomes available.

## **TECHNICAL ASSISTANCE**

The Department of Neighborhoods will provide technical assistance, through training or consulting in the following areas:

- Development of proposals for interested parties (***to be conducted following the announcement of funding availability but before development of the Annual Action Plan is completed***);
- Federal requirements for compliance for those agencies and organizations selected to receive funding through the Consolidated Plan to be conducted on a quarterly basis.



- The Department of Neighborhoods will provide individual technical assistance upon request or at the direction of the Director to groups representing persons of low- and moderate- income and to those agencies and organizations selected to receive funding through the Consolidated Plan. Requests for individual assistance should be made in writing with a reasonable amount of time to schedule and plan for the technical assistance.

## **Activities Exempt from Substantial Amendment Citizen Participation Requirements**

### **Disaster/Emergency Events**

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate an expedited substantial amendment including (1) Man-Made-disasters, (2) Natural disasters, and (3) Terrorism. Man-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, hurricanes, tornadoes, wild fires, flooding and public health issues such as wide-spread disease such as the recent Coronavirus disease 2019 (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.

With respect to a declared disaster, the City may elect to use CDBG, ESG or HOME funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal, state or local sources unless allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, or any other CDBG, ESG, or HOME eligible use. HUD may provide new guidance on eligible uses in which the City will comply with and may utilize as well.

All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are: (1) Benefit to low- and moderate-income (LMI) persons; (2) Aid in the prevention of slums or blight; and (3) Meet a need having a particular urgency (referred to urgent need). The City may carryout eligible CDBG activities to meet needs resulting from declared disasters or emergencies under any one of the three national objectives.

### **Responding to the COVID-19 Pandemic**

The City may reprogram as needed of PY 2019 and/or PY 2020 and future CDBG, ESG and HOME funding to respond to the COVID-19 pandemic.

Funding for activities that have required in-person interaction including, but not limited to, housing rehabilitation assistance, and a variety of community services may be reprogrammed into activities that allow for social distancing such as grab and go or home-delivered meal services, online programming for a variety of clientele including, but not limited to, youth and senior citizens, and various business and microenterprise assistance identified below to respond to or recover from the effects of the COVID-19 pandemic. Please see below for other possible activities that may be funded. Any other possible eligible activity not included below may also be considered. The City will coordinate with an informal committee of subject matter experts before undertaking any activity to respond to the COVID-19 pandemic.



**Potential eligible CDBG Activities that may be undertaken to support the COVID-19 response include, but are not limited to:**

- Building and Improvements, including Public Facilities such as constructing testing and diagnosis, or treatment facility; rehabilitation of a community facility to establish an infectious disease treatment clinic; acquisition and rehabilitation, or construction of a group living facility that may be used to centralize patients undergoing treatment; rehabilitation of a commercial building or closed school building to establish an infectious disease treatment clinic, e.g. by replacing the HVAC system; acquisition and rehabilitation of a motel or hotel building to expand the capacity of hospitals to accommodate isolation of patients during recovery; or to make interim improvements to private properties to enable an individual patient to remain quarantined on a temporary basis;
- Assistance to Businesses, including Special Economic Development Activities such as providing grants or loans to support new business expansion to create jobs and manufacture medical supplies necessary to respond to infectious disease; avoid job loss caused by business closures related to social distancing by providing short-term working capital assistance to small businesses to enable retention of jobs held by low- and moderate-income persons; or to provide technical assistance, grants, loans, and other financial assistance to establish, stabilize, and expand microenterprises that provide medical, food delivery, cleaning, and other services to support home health and quarantine;
- Public Services such as job training to expand the pool of health care workers and technicians that are available to treat a disease within a community; provide testing, diagnosis or other services at a fixed or mobile location; increase the capacity and availability of targeted health services for infectious disease response within existing facilities; provide equipment, supplies, and materials necessary to carry out a public service; deliver meals on wheels to quarantined individuals that need to maintain social distancing due to medical vulnerabilities;
- Planning, Capacity Building, and Technical Assistance such as gathering data and developing non-project specific emergency infectious disease response plans; and
- Any other activity allowed under current CDBG regulations.

**Urgent Need**

It may be necessary to amend the Consolidated Plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. Therefore, the City of Toledo, acting through the Department of Neighborhoods may utilize its CDBG, ESG or HOME funds to meet an Urgent Need without the normal public comment period, which is otherwise required for Substantial Amendments.

To comply with the national objective of meeting community development needs having a particular urgency, an activity will alleviate existing conditions that the City of Toledo certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;
- The City and the Department of Neighborhoods are unable to finance the activity on



its own; and,

- Other resources of funding are not available to carry out the activity.

A condition will generally be considered to be of recent origin if it is developed or became critical within eighteen (18) months preceding the Department of Neighborhood's certification;

If HUD allows, such as through a waiver, activities under the urgent need national objective to be funded without the requirement that the City is unable to finance the activity on its own and other resources of funding are not available to carry out the activity, the Department of Neighborhoods will only certify that the activity poses a serious and immediate threat to the health and welfare of the community and is of recent origin or recently became urgent.

Urgent need activities may include, but not limited to, the following:

- Clearance of debris;
- Provision of extra security patrols;
- Demolition, clearance and/or reconstruction of damaged property posing an immediate threat to public safety;
- Emergency reconstruction of essential water, sewer, electrical, medical, and telephone facilities;
- Emergency repair of streets and sidewalks; and,
- Providing a variety of relief services to individuals.

### **Administrative Updates**

Changes to the Consolidated Plan that do not meet the criteria for standard or substantial amendments and do not require citizen participation are defined as administrative updates. Examples of administrative updates include grammatical or structural edits that do not substantially change the scope or meaning of activity; and changes in the coding or eligibility determination of a project that does not change the scope, location, or beneficiaries.

## **COMMONLY USED TERMS AND DEFINITIONS**

**Action Plan** - The annual document required by HUD that describes how the City will use its anticipated CDBG, HOME and ESG resources to implement the Consolidated Plan in a one-year time frame. The Action Plan also describes other actions that the City, its subrecipients (*third-party partners*), and other community partners will take to implement its Consolidated Plan.

**Citizen Participation Plan (CPP)** - The HUD required plan that sets forth the City's policies and procedures for community and public input in HUD programs. The adopted plan must be used when developing the Consolidated Plan, the Action Plan and any substantial amendments to either plan.

**Citizens Review Committee (CRC)** - An advisory committee to the Mayor and City Council made up of individual volunteers and community leaders. It is part of the official body, in concert with the IRC (Internal Review Committee), responsible for making funding recommendations for the CDBG and ESG programs based on application review.

**Community Development Block Grant (CDBG)** - A federally funded program administered by HUD with three primary objectives: to benefit low/moderate income persons through the creation of suitable living environments, decent housing, and economic opportunities; address and/or eliminate slum and blight; and address an urgent need.

**Consolidated Annual Performance and Evaluation Report (CAPER)** - This document reports one-year accomplishments and progress of the CDBG, HOME, ESG and any other HUD programs administered by the Department of Neighborhoods. The CAPER also includes financial reports regarding the use of grant dollars allocated to the above mentioned programs.

**Consolidated Plan (CONPLAN)** - A Five-Year comprehensive plan that describes the City's housing and community development needs and goals along with projected local strategies to address them.

**Emergency Solutions Grants (ESG)** - Emergency Solutions Grants replaced the Emergency Shelter Grants program in 2011. The change in the program's name reflects the change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. ESG includes funds for a variety of established life-saving activities and for newer interventions (*such as rapid re-housing and homelessness prevention*) proven to be successful at preventing and ending homelessness. Eligible activities are:

- Rapid Re-Housing of homeless individuals and families into permanent housing;
- Homelessness Prevention;
- Emergency Shelter Care;
- Street Outreach;
- HMIS (*Homeless Management Information System*); and,
- Administrative Activities

**HOME Investment Partnership Program (HOME)** - A federally funded program administered by HUD for the purpose of homeowner rehabilitation, homebuyer activities, rental housing, and tenant-based rental assistance activities.

***U. S. Department of Housing and Urban Development (HUD)*** - The federal agency that oversees the use of federally funded programs including CDBG, HOME, and ESG, approves the City's Consolidated Plan, Annual Action Plan, Consolidated Annual Performance and Evaluation Report (***CAPER***), and any amendments to the aforementioned items. HUD is the regulatory agency charged with monitoring the City for compliance with all applicable contractual requirements.

***Internal Review Committee (IRC)*** - An advisory committee to the Mayor and City Council comprised of City of Toledo staff. It is part of the official body, in concert with the CRC, responsible for making funding recommendations for the CDBG and ESG programs based on application review.

***Substantial Amendment*** - The Consolidated Plan and Annual Action Plan are living documents and, therefore, the City of Toledo recognizes that it may periodically be necessary to make significant changes to the documents. A substantial amendment to the Consolidated Plan or Annual Action Plan is necessary to:

- ***Change allocation priorities or change the method of distribution of funds;***
- ***Carry out an activity, using funds from any program covered by the consolidated plan (including program income), not previously described in the action plan;***
- ***Change the purpose, scope, location, or beneficiaries of an activity; or,***
- ***Reflect a change of thirty percent (30%) or more in the total annual grant allocation.***
- ***To allow the HUD waiver process for the 5 days Public Notice;***
- ***To allow the truncated process for the reasonable comment period for the COVID activities;***
- ***To allow the addition of the COVID-related activities;***
- ***To allow waiver of thirty percent (30%) or more change in the total annual grant allocation, a change within programmatic service/scope of the plan, location or beneficiary as needed of PY2019, PY2020 and any future CDBG, ESG or HOME funding for COVID related activities; and***
- ***To implement applicable HOME statutory suspensions and/or regulatory waivers issued by HUD.***

The City of Toledo substantial amendment policy will follow 24 CFR 91.505 – “*Amendments to the Consolidated Plan,*” unless otherwise directed by HUD.



# City of Toledo

One Government Center  
Toledo, OH 43604

## Legislation Text

**File #: R-194-20, Version: 1**

Amended Citizen Participation Plan  
Department of Neighborhoods  
Bonita Bonds  
(419) 245-1401

**Adopting an amended Citizen Participation Plan for the City of Toledo; and declaring an emergency.**

### SUMMARY & BACKGROUND:

The Department of Housing and Urban Development (HUD) requires the City of Toledo to adopt a Citizen Participation Plan. Res. 72-16 adopted an amended Citizen Participation Plan on March 16, 2016. This plan now needs to be amended again to reflect the COVID-19 pandemic; the technological/virtual changes; the truncated process for the 5 days Public Notice for COVID-related activities; the truncated process to waive the 30-day Comment Period of no fewer than 5 days for COVID-related activities; and to waive the Substantial Amendment change of thirty percent (30%) or more in the amount of funds allocated to a project/activity, a change within the programmatic service/scope of the plan, location or beneficiary for COVID-related activities.

NOW, THEREFORE, Be it resolved by the Council of the City of Toledo:


SECTION 1. That the Council of the City of Toledo does hereby adopt an amended Citizen Participation Plan as on file with the Clerk of Council.

SECTION 2. That this Resolution hereby is declared to be an emergency measure and shall be in force and effect from and after its passage. The reason for the emergency lies in the fact that same is necessary for the immediate preservation of the public peace, health, safety and property, and for the further reason that it is necessary to adopt an amended Citizen Participation Plan with updates in accordance with HUD regulations, and, particularly to reflect COVID-19 pandemic emergency measures impacting the availability of the Plan.

Vote on emergency clause: yeas 12, nays 0.

Adopted: JUN 2 2020, as an emergency measure: yeas 12, nays 0.

Attest:

  
Clerk of Council

  
President of Council

Approved:

JUN 3 2020

  
Mayor



# **CENSUS TRACT DATA AND ANALYSIS**

# Census Tract Data and Analysis

Due to the restrictive nature of the IDIS system, we are moving all of the census-tract level information to this appendix and will cite it at the appropriate places in the main Consolidated Plan in IDIS.

## NA-30 Disproportionately Greater Need: Discussion

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

Below we list the 124 census tracts either wholly or partially in Toledo. For each tract we list the total number of households and the percentage of race and ethnicity. Using the HUD definition of disproportionate as being 10 percentage points or more than the average for the city as a whole, we highlight the tracts where a certain group is disproportionately **over-** or **under-** represented.

There is a good deal of fluctuation in both the Black and White populations based on geography. These fluctuations are mostly complementary, with one population being overrepresented in census tracts where the other is underrepresented. Fully two thirds of the census tracts in the city fit this complementary Black/White over/under-representation dynamic. This shows that Toledo is still a largely de facto segregated city.

No other racial or ethnic group makes up more than 10% of the households in the city, so by the HUD definition they cannot be disproportionately underrepresented. There are a handful of tracts where Hispanic/Latino households are overrepresented, as well as households with a householder who identifies as multi-racial or other. Interestingly, these three groups are often overrepresented in the same areas (see tracts 39095000460 – 39095000540 for example). In these census tracts, we often see the number of Black households underrepresented but the number of White households **not** overrepresented.

There is only one census tract (39095007501) where Asian households are overrepresented. There are no census tracts where American Indian, Alaska Native, Native Hawaiian, or Pacific Islander, households are overrepresented.

NA-30 Figure 1: Race and Ethnicity by Census Tract									
	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total Households
Toledo	63.3%	27.8%	0.2%	1.3%	0.0%	2.7%	4.7%	6.9%	118,508

	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095000201	71.7%	24.2%	0.0%	0.7%	0.0%	0.0%	3.4%	4.1%	873
39095000202	73.6%	18.2%	0.1%	0.0%	0.0%	0.0%	8.0%	2.4%	696
39095000301	55.0%	38.0%	0.0%	0.0%	0.0%	0.0%	7.0%	7.4%	1,128
39095000302	83.7%	7.3%	0.0%	0.0%	0.0%	1.3%	7.7%	3.8%	1,011
39095000400	60.8%	32.1%	0.0%	0.0%	0.0%	0.8%	6.2%	6.5%	1,438
39095000601	58.7%	28.3%	0.0%	1.7%	0.0%	0.5%	10.9%	8.7%	1,501
39095000602	57.0%	42.6%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	284
39095000701	66.8%	22.4%	0.0%	0.0%	0.0%	0.0%	10.8%	0.0%	575
39095000702	72.5%	20.0%	0.0%	0.0%	0.0%	0.0%	7.5%	7.5%	835
39095000703	66.0%	32.7%	0.0%	1.3%	0.0%	0.0%	0.0%	0.0%	385
39095000800	16.6%	73.1%	0.0%	0.0%	0.0%	1.3%	9.0%	3.6%	614
39095000900	40.6%	39.6%	0.0%	0.0%	0.0%	9.7%	10.1%	12.8%	833
39095001001	31.9%	53.1%	0.0%	0.0%	0.0%	11.3%	3.7%	11.3%	621
39095001002	39.8%	52.4%	0.0%	1.8%	0.0%	1.5%	4.5%	7.6%	949
39095001100	35.0%	53.9%	0.3%	3.3%	0.0%	5.7%	1.8%	16.7%	906
39095001201	79.4%	13.7%	0.0%	0.0%	0.0%	4.8%	2.1%	8.2%	767
39095001202	35.3%	56.2%	0.0%	0.0%	0.0%	0.5%	8.1%	5.5%	853
39095001301	88.0%	8.4%	0.0%	0.6%	0.0%	0.0%	2.9%	1.7%	1,128
39095001302	68.3%	26.1%	0.0%	3.5%	0.0%	0.0%	2.0%	12.4%	1,129
39095001303	47.8%	39.0%	0.0%	0.0%	0.0%	1.5%	11.7%	4.0%	1,438
39095001400	14.4%	82.8%	0.7%	0.9%	0.0%	0.0%	1.2%	0.0%	682
39095001500	12.2%	85.6%	0.0%	0.0%	0.0%	1.1%	1.1%	1.1%	542
39095001601	24.6%	71.7%	0.0%	0.0%	0.0%	3.5%	0.2%	3.7%	565
39095001602	67.6%	30.2%	0.0%	0.0%	0.0%	2.2%	0.0%	2.2%	583

	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095001700	33.7%	54.6%	0.0%	0.0%	0.0%	11.8%	0.0%	4.6%	416
39095001800	46.7%	44.1%	0.0%	2.3%	0.0%	0.0%	6.8%	3.8%	863
39095001900	18.9%	73.1%	0.0%	0.0%	0.0%	4.1%	3.9%	1.9%	700
39095002000	70.7%	22.4%	1.2%	0.0%	0.0%	4.4%	1.4%	19.0%	501
39095002100	62.6%	31.1%	0.0%	0.0%	0.0%	4.3%	2.0%	11.3%	1,266
39095002401	53.0%	40.7%	1.1%	2.8%	0.0%	0.0%	2.4%	7.1%	1,440
39095002402	12.5%	87.5%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%	489
39095002500	0.0%	90.0%	0.0%	2.2%	0.0%	1.2%	6.6%	0.0%	743
39095002600	4.7%	82.8%	0.0%	4.2%	0.0%	0.0%	8.4%	2.7%	406
39095002700	37.4%	52.5%	2.8%	0.0%	0.0%	4.8%	2.5%	9.7%	709
39095002800	50.8%	35.0%	0.0%	0.0%	0.0%	4.9%	9.2%	5.3%	714
39095002900	42.1%	52.7%	0.0%	0.0%	0.0%	0.0%	5.2%	5.5%	1,044
39095003000	58.6%	28.8%	0.9%	0.0%	0.0%	1.1%	10.5%	8.7%	873
39095003100	14.5%	84.4%	0.0%	0.0%	0.0%	0.0%	1.1%	0.0%	449
39095003200	3.4%	96.4%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	468
39095003300	0.0%	98.3%	0.0%	0.0%	0.0%	0.0%	1.7%	0.0%	532
39095003500	5.2%	92.7%	0.0%	0.0%	0.0%	0.0%	2.2%	0.0%	368
39095003600	8.2%	82.9%	0.0%	3.2%	0.0%	0.0%	5.7%	0.0%	474
39095003901	77.7%	18.3%	0.0%	0.0%	0.0%	0.0%	4.0%	3.2%	1,343
39095003902	67.2%	25.0%	0.0%	0.0%	0.0%	0.0%	7.8%	12.1%	819
39095004000	48.4%	49.0%	0.0%	0.0%	0.0%	1.4%	1.2%	7.0%	690
39095004200	44.3%	12.9%	0.0%	2.0%	2.4%	31.9%	6.6%	40.4%	700
39095004401	62.4%	25.3%	0.0%	0.0%	0.0%	10.7%	1.6%	6.6%	439
39095004402	41.2%	53.8%	1.8%	0.0%	0.0%	2.7%	0.5%	4.5%	820

	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095004501	91.0%	3.6%	0.0%	1.7%	0.0%	1.3%	2.4%	4.6%	1,185
39095004503	81.1%	8.9%	0.0%	0.0%	0.9%	2.5%	6.6%	11.1%	1,284
39095004504	91.3%	3.2%	0.0%	0.8%	0.0%	1.3%	3.4%	3.0%	1,421
39095004600	72.8%	0.9%	0.0%	3.6%	0.0%	14.3%	8.5%	22.0%	800
39095004701	56.6%	31.1%	0.0%	0.7%	0.0%	7.2%	4.3%	7.2%	1,079
39095004702	68.7%	11.0%	0.0%	0.0%	0.0%	9.8%	10.5%	25.8%	1,363
39095004800	59.2%	15.8%	0.0%	0.0%	0.0%	9.5%	15.4%	21.2%	1,136
39095004900	65.5%	14.6%	0.0%	0.0%	0.0%	4.4%	15.5%	14.6%	1,132
39095005000	75.9%	14.9%	0.0%	0.0%	0.0%	5.3%	3.9%	8.8%	693
39095005101	57.2%	31.6%	0.0%	3.6%	0.0%	3.0%	4.6%	8.4%	1,183
39095005102	62.4%	6.2%	0.0%	1.1%	0.0%	21.7%	8.6%	39.5%	534
39095005200	58.0%	11.1%	0.0%	0.0%	0.0%	21.7%	9.2%	29.1%	1,240
39095005300	63.0%	8.7%	0.4%	0.0%	0.0%	12.8%	15.2%	14.3%	705
39095005400	51.7%	20.0%	0.0%	0.0%	0.0%	12.2%	16.1%	27.5%	894
39095005501	93.1%	3.0%	0.3%	0.0%	0.0%	0.0%	3.5%	0.6%	1,268
39095005502	90.3%	0.5%	0.0%	0.0%	0.0%	4.0%	5.2%	8.1%	1,512
39095005503	89.8%	8.8%	0.0%	0.0%	0.0%	0.0%	1.3%	3.3%	904
39095005601	96.0%	1.3%	0.0%	0.0%	0.0%	2.0%	0.7%	2.0%	2,056
39095005602	97.3%	2.7%	0.0%	0.0%	0.0%	0.0%	0.0%	4.7%	403
39095005701	76.2%	12.7%	0.0%	0.2%	0.0%	3.4%	7.6%	8.9%	1,389
39095005703	72.7%	13.5%	0.0%	0.0%	0.0%	2.8%	11.0%	8.7%	1,081
39095005704	84.4%	9.8%	0.0%	0.1%	0.0%	4.1%	1.6%	8.8%	1,068
39095005705	67.9%	24.0%	0.0%	0.0%	0.0%	0.0%	8.2%	9.1%	1,002
39095005801	75.5%	18.0%	0.0%	0.1%	0.0%	4.3%	2.1%	8.7%	1,752

	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095005803	88.1%	4.1%	0.0%	0.0%	0.0%	3.9%	3.9%	3.9%	747
39095005804	69.6%	26.1%	0.0%	0.0%	0.0%	2.8%	1.5%	7.1%	1,350
39095005901	96.9%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%	1.4%	1,052
39095005902	83.4%	6.7%	0.0%	3.1%	0.0%	1.0%	5.7%	4.8%	1,844
39095006000	89.3%	8.1%	0.0%	1.2%	0.0%	0.0%	1.5%	4.7%	1,026
39095006100	98.3%	0.0%	0.0%	0.0%	0.0%	0.0%	1.7%	2.7%	1,299
39095006200	79.3%	14.2%	0.0%	2.6%	0.0%	0.0%	3.9%	3.7%	1,067
39095006300	78.0%	17.7%	0.0%	0.0%	0.0%	0.0%	4.3%	1.6%	1,371
39095006400	88.8%	5.9%	0.0%	1.9%	0.0%	0.0%	3.4%	1.8%	1,138
39095006500	44.9%	45.1%	0.0%	3.5%	0.0%	2.1%	4.3%	3.5%	1,369
39095006600	30.6%	59.9%	0.4%	0.0%	0.0%	1.7%	7.4%	3.9%	955
39095006700	50.3%	27.2%	0.0%	7.7%	0.0%	5.9%	8.9%	10.2%	875
39095006801	50.4%	46.0%	0.0%	1.3%	0.0%	0.0%	2.3%	12.8%	1,551
39095006802	39.3%	49.0%	0.3%	9.3%	0.0%	1.4%	0.7%	0.0%	1,469
39095006900	85.3%	12.1%	0.0%	0.0%	0.0%	0.9%	1.7%	0.9%	1,264
39095007002	96.7%	0.0%	0.0%	0.0%	0.0%	2.0%	1.4%	4.2%	814
39095007202	82.0%	13.6%	0.0%	0.5%	0.0%	1.2%	2.7%	5.2%	1,618
39095007204	59.1%	32.2%	1.7%	2.4%	0.0%	3.2%	1.4%	7.6%	2,426
39095007206	86.8%	10.0%	0.0%	0.0%	0.0%	3.1%	0.0%	1.6%	707
39095007207	85.2%	8.2%	0.0%	0.6%	0.0%	3.3%	2.6%	3.1%	1,084
39095007208	61.3%	35.1%	0.0%	2.1%	0.0%	0.0%	1.5%	0.0%	1,377
39095007209	37.6%	59.3%	0.0%	0.0%	0.0%	1.0%	2.1%	4.6%	1,155
39095007302	45.4%	48.1%	0.6%	3.8%	0.0%	0.0%	2.1%	3.1%	1,404
39095007304	55.4%	27.2%	0.0%	9.8%	0.0%	7.1%	0.6%	8.5%	1,267



	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095007305	83.7%	9.3%	0.0%	0.0%	0.6%	1.6%	4.8%	3.0%	979
39095007306	45.6%	50.0%	1.4%	0.6%	0.0%	1.2%	1.1%	2.7%	1,879
39095007307	52.1%	42.6%	0.0%	0.0%	0.0%	0.0%	5.3%	3.9%	760
39095007401	42.7%	41.7%	0.4%	11.3%	0.0%	2.9%	1.0%	2.6%	1,310
39095007402	36.1%	54.4%	0.0%	1.8%	0.0%	0.0%	7.7%	2.0%	1,475
39095007501	40.4%	39.1%	0.0%	16.0%	0.0%	3.4%	1.1%	3.4%	1,012
39095007502	62.1%	32.5%	0.0%	0.6%	0.0%	0.0%	4.9%	1.2%	899
39095007700	88.5%	3.9%	0.0%	1.2%	0.0%	4.5%	1.9%	7.6%	1,521
39095007801	98.1%	0.0%	0.5%	1.0%	0.0%	0.5%	0.0%	4.3%	887
39095007802	83.9%	14.7%	0.0%	0.0%	0.0%	0.0%	1.3%	2.4%	990
39095007901	90.0%	2.0%	0.0%	1.6%	0.0%	1.0%	5.5%	4.7%	837
39095007903	94.2%	4.3%	0.0%	0.0%	0.0%	1.0%	0.5%	1.0%	1,230
39095007904	84.2%	5.8%	0.0%	0.0%	0.0%	0.0%	10.1%	4.6%	1,243
39095008000	88.1%	2.5%	0.5%	4.4%	0.0%	0.0%	4.5%	1.5%	1,693
39095008302	93.0%	5.9%	0.0%	0.0%	0.0%	0.0%	1.1%	1.1%	757
39095008303	81.5%	6.3%	0.0%	3.8%	0.0%	1.6%	6.7%	15.7%	1,397
39095008304	81.2%	2.0%	0.0%	6.6%	0.0%	0.0%	10.2%	0.3%	1,429
39095008401	61.6%	21.3%	0.3%	1.7%	0.0%	0.0%	15.2%	3.3%	1,444
39095008501	75.9%	22.9%	0.1%	0.0%	0.0%	0.0%	1.2%	0.0%	1,256
39095008502	76.0%	8.0%	0.9%	0.6%	0.0%	1.1%	13.5%	3.8%	817
39095008601	72.8%	17.0%	0.0%	0.0%	0.0%	0.0%	10.2%	2.0%	1,076
39095008602	80.4%	15.4%	0.0%	0.0%	0.0%	3.2%	1.0%	2.4%	1,231
39095009902	92.6%	0.0%	0.0%	0.0%	0.0%	6.0%	1.4%	1.4%	420
39095010200	68.9%	25.3%	0.0%	1.1%	0.0%	2.6%	2.1%	11.1%	1,515

	White	Black	AI/NA	Asian	NH/PI	Other	Multi-Racial	Latino	Total House-holds
39095010300	64.6%	19.6%	0.0%	0.0%	0.0%	9.8%	5.9%	27.3%	560
39095010400	93.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7.0%	4.8%	187
39095010500	15.4%	78.7%	0.0%	2.2%	0.0%	0.0%	3.8%	4.3%	1,246
39095010600	39.3%	52.4%	0.0%	3.1%	0.0%	0.0%	5.1%	9.5%	1,088

Data Source: 2019-2023 ACS – B11001I, B25006

## MA-50 Needs and Market Analysis Discussion

**Are there areas where households with multiple housing problems are concentrated?  
(include a definition of "concentration")**

For this section, the city is defining concentration to mean any area of the city where residents experience any housing problem(s) at a rate of 10 percentage points or more than the rate of the city as a whole. Also, to clarify, among the 118,508 households in the city, there are 1,140 households with substandard housing, 850 households that are overcrowded, and 339 households that are severely overcrowded, around two percent of all households. However, there are 33,510 households that have a housing cost burden or a severe housing cost burden. When “housing problems” are discussed, housing “affordability” is the chief concern.

MA-50 Figure 1: Housing Problems by Census Tract								
	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
Toledo	20.4%	0.3%	0.0%	0.0%	42.4%	1.5%	0.1%	0.0%
39095000201	14.5%	0.0%	0.0%	0.0%	69.9%	0.0%	0.0%	0.0%
39095000202	4.6%	0.0%	0.0%	0.0%	38.2%	0.0%	0.0%	0.0%
39095000301	19.2%	0.0%	0.0%	0.0%	50.1%	0.0%	0.0%	0.0%
39095000302	15.2%	1.2%	0.0%	0.0%	57.3%	0.0%	0.0%	0.0%
39095000400	18.7%	0.0%	0.0%	0.0%	35.3%	0.0%	0.0%	0.0%
39095000601	29.5%	0.0%	0.0%	0.0%	35.2%	0.0%	0.0%	0.0%
39095000602	19.3%	0.0%	0.0%	0.0%	33.9%	0.0%	0.0%	0.0%
39095000701	59.1%	0.0%	0.0%	0.0%	72.7%	0.0%	0.0%	0.0%
39095000702	16.1%	0.0%	0.0%	0.0%	30.7%	0.0%	0.0%	0.0%
39095000703	43.9%	0.0%	0.0%	0.0%	46.5%	0.0%	0.0%	0.0%
39095000800	32.3%	1.2%	0.0%	0.0%	43.9%	0.0%	0.0%	0.0%
39095000900	10.7%	1.0%	0.0%	0.0%	62.9%	0.0%	0.0%	0.0%

	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
39095001001	60.3%	0.0%	0.0%	0.0%	16.1%	0.0%	0.0%	0.0%
39095001002	15.6%	0.0%	0.0%	0.0%	59.7%	0.0%	0.0%	0.0%
39095001100	26.8%	0.0%	0.0%	0.0%	75.3%	0.0%	0.0%	0.0%
39095001201	12.4%	0.0%	0.0%	0.0%	43.5%	0.0%	0.0%	0.0%
39095001202	26.9%	0.0%	0.0%	0.0%	29.9%	3.7%	7.0%	0.0%
39095001301	3.5%	0.0%	0.0%	0.0%	31.8%	0.0%	0.0%	0.0%
39095001302	4.6%	0.0%	0.0%	0.0%	50.5%	0.2%	0.0%	0.0%
39095001303	22.9%	0.8%	0.0%	0.0%	33.4%	0.0%	0.0%	0.0%
39095001400	12.1%	0.0%	0.0%	0.0%	51.3%	0.0%	0.0%	0.0%
39095001500	41.2%	0.0%	0.0%	0.0%	79.8%	0.0%	0.0%	0.0%
39095001601	44.3%	0.0%	0.0%	0.0%	70.3%	0.0%	0.0%	0.0%
39095001602	21.6%	0.0%	0.0%	0.0%	70.6%	0.0%	0.0%	0.0%
39095001700	4.6%	0.0%	0.0%	0.0%	32.5%	0.0%	0.0%	0.0%
39095001800	39.1%	4.2%	0.0%	0.0%	71.7%	8.9%	0.0%	0.0%
39095001900	20.5%	0.0%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%
39095002000	25.1%	0.0%	0.0%	0.0%	20.4%	3.7%	0.0%	0.0%
39095002100	17.4%	0.0%	0.0%	0.0%	45.1%	0.0%	0.0%	0.0%
39095002401	13.3%	0.0%	0.0%	0.0%	51.4%	2.6%	0.0%	0.0%
39095002402	21.9%	0.0%	0.0%	0.0%	41.4%	0.0%	0.0%	0.0%
39095002500	18.6%	0.0%	0.0%	0.0%	61.6%	0.0%	0.0%	0.0%
39095002600	31.4%	0.0%	0.0%	0.0%	62.7%	0.0%	0.0%	0.0%
39095002700	n/a`	n/a	n/a	n/a	30.3%	0.0%	0.0%	0.0%

	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
39095002800	0.0%	0.0%	0.0%	0.0%	21.8%	0.0%	0.0%	0.0%
39095002900	9.5%	0.0%	0.0%	0.0%	44.7%	2.2%	0.0%	0.0%
39095003000	31.8%	9.4%	0.0%	0.0%	47.7%	0.0%	0.0%	0.0%
39095003100	29.8%	0.0%	0.0%	0.0%	13.3%	0.0%	0.0%	0.0%
39095003200	48.0%	0.0%	0.0%	0.0%	24.3%	0.0%	0.0%	0.0%
39095003300	23.1%	0.0%	0.0%	0.0%	44.8%	0.0%	0.0%	0.0%
39095003500	16.1%	0.0%	0.0%	0.0%	21.6%	0.0%	0.0%	0.0%
39095003600	36.7%	0.0%	0.0%	0.0%	43.9%	0.0%	0.0%	0.0%
39095003901	19.9%	0.0%	0.0%	0.0%	48.1%	0.0%	0.0%	0.0%
39095003902	11.5%	3.8%	0.0%	0.0%	46.2%	0.0%	0.0%	0.0%
39095004000	16.2%	0.0%	0.0%	0.0%	86.3%	0.0%	0.0%	0.0%
39095004200	59.7%	0.0%	0.0%	0.0%	53.1%	0.0%	0.0%	0.0%
39095004401	4.6%	0.0%	0.0%	0.0%	74.6%	0.0%	0.0%	0.0%
39095004402	9.4%	0.0%	0.0%	0.0%	22.8%	0.0%	0.0%	0.0%
39095004501	16.1%	0.0%	0.0%	0.0%	32.2%	0.0%	0.0%	0.0%
39095004503	22.6%	0.0%	0.0%	0.0%	52.6%	0.0%	0.0%	0.0%
39095004504	18.3%	0.0%	0.0%	0.0%	37.7%	0.0%	0.0%	0.0%
39095004600	8.4%	0.0%	0.0%	0.0%	25.8%	0.0%	0.0%	0.0%
39095004701	24.5%	0.0%	0.0%	0.0%	60.4%	0.0%	0.0%	0.0%
39095004702	30.3%	2.7%	1.0%	0.0%	36.2%	4.6%	0.0%	0.0%
39095004800	37.9%	0.0%	0.0%	0.0%	71.1%	0.0%	0.0%	0.0%
39095004900	3.5%	0.0%	0.0%	0.0%	42.0%	9.4%	0.0%	0.0%

	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
39095005000	14.7%	0.0%	0.0%	0.0%	48.3%	7.8%	0.0%	0.0%
39095005101	14.9%	0.0%	0.0%	0.0%	36.4%	0.0%	0.0%	0.0%
39095005102	12.1%	0.0%	0.0%	0.0%	27.3%	3.2%	0.0%	0.0%
39095005200	28.4%	0.0%	0.0%	0.0%	32.8%	6.3%	0.0%	0.0%
39095005300	20.8%	0.3%	0.0%	0.0%	49.9%	3.5%	0.0%	0.0%
39095005400	14.7%	0.0%	0.0%	0.0%	58.9%	4.7%	0.0%	0.0%
39095005501	31.0%	0.0%	0.0%	0.0%	58.8%	5.5%	0.0%	0.0%
39095005502	11.8%	0.0%	0.0%	0.0%	16.9%	0.0%	0.0%	0.0%
39095005503	19.1%	0.0%	0.0%	0.0%	17.4%	0.0%	0.0%	0.0%
39095005601	10.4%	0.0%	0.0%	0.0%	37.5%	0.0%	0.0%	0.0%
39095005602	23.3%	0.0%	0.0%	0.0%	19.6%	0.0%	0.0%	0.0%
39095005701	19.3%	0.0%	0.0%	0.0%	35.5%	2.5%	0.0%	0.0%
39095005703	28.9%	0.0%	0.0%	0.0%	32.5%	0.0%	0.0%	0.0%
39095005704	32.2%	0.0%	0.0%	0.0%	44.6%	0.0%	0.0%	0.0%
39095005705	39.4%	0.0%	0.0%	0.0%	13.9%	0.0%	0.0%	0.0%
39095005801	17.0%	0.0%	0.0%	0.0%	22.6%	0.2%	0.0%	0.0%
39095005803	15.3%	0.0%	0.0%	0.0%	50.5%	0.0%	0.0%	0.0%
39095005804	21.3%	0.0%	0.0%	0.0%	53.2%	0.0%	0.0%	0.0%
39095005901	18.8%	0.0%	0.0%	0.0%	84.2%	0.0%	0.0%	0.0%
39095005902	20.5%	0.0%	0.0%	0.0%	32.6%	0.0%	0.0%	0.0%
39095006000	13.2%	4.9%	0.0%	0.0%	56.0%	0.0%	0.0%	0.0%
39095006100	13.1%	0.0%	0.0%	0.0%	29.3%	0.0%	0.0%	0.0%



	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
39095006200	6.8%	0.0%	0.0%	0.0%	56.4%	0.0%	0.0%	0.0%
39095006300	13.5%	0.0%	0.0%	0.0%	36.0%	0.0%	0.0%	0.0%
39095006400	8.6%	0.0%	0.0%	0.0%	4.4%	0.0%	0.0%	0.0%
39095006500	8.3%	0.0%	0.0%	0.0%	46.3%	0.0%	0.0%	0.0%
39095006600	44.3%	0.0%	0.0%	0.0%	20.2%	0.0%	0.0%	0.0%
39095006700	22.5%	0.0%	0.0%	0.0%	60.4%	3.3%	0.0%	0.0%
39095006801	40.2%	0.0%	0.0%	0.0%	28.3%	0.5%	0.0%	0.0%
39095006802	32.7%	0.0%	0.0%	0.0%	40.2%	0.3%	0.0%	0.0%
39095006900	18.1%	0.0%	0.0%	0.0%	44.9%	0.0%	0.0%	0.0%
39095007002	15.7%	0.0%	0.0%	0.0%	50.3%	0.0%	0.0%	0.0%
39095007202	17.1%	0.0%	0.0%	0.0%	37.5%	9.4%	0.0%	0.0%
39095007204	26.1%	0.0%	0.0%	0.0%	14.8%	0.0%	0.0%	0.0%
39095007206	15.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
39095007207	30.1%	0.0%	0.0%	0.0%	62.7%	11.0%	0.0%	0.0%
39095007208	17.1%	0.0%	0.0%	0.0%	42.5%	11.9%	0.0%	0.0%
39095007209	18.5%	0.0%	0.0%	0.0%	38.8%	0.0%	0.0%	0.0%
39095007302	38.6%	1.6%	0.0%	0.0%	34.8%	0.0%	0.0%	0.0%
39095007304	13.7%	0.0%	0.0%	0.0%	21.7%	9.9%	0.0%	0.0%
39095007305	9.8%	0.0%	0.0%	0.0%	50.7%	0.0%	0.0%	0.0%
39095007306	39.5%	0.0%	0.0%	0.0%	53.9%	0.0%	0.0%	0.0%
39095007307	0.0%	0.0%	0.0%	0.0%	49.7%	3.5%	0.0%	0.0%
39095007401	21.5%	0.0%	0.0%	0.0%	44.6%	0.0%	0.0%	0.0%

	Owners				Renters			
# conditions:	1	2	3	4	1	2	3	4
39095007402	17.0%	1.6%	0.0%	0.0%	60.0%	0.0%	0.0%	0.0%
39095007501	2.8%	0.0%	0.0%	0.0%	55.1%	0.0%	0.0%	0.0%
39095007502	26.0%	0.0%	0.0%	0.0%	54.3%	4.3%	0.0%	0.0%
39095007700	20.0%	0.0%	0.0%	0.0%	38.2%	0.0%	0.0%	0.0%
39095007801	16.5%	0.0%	0.0%	0.0%	49.2%	0.0%	0.0%	0.0%
39095007802	30.3%	0.0%	0.0%	0.0%	26.0%	1.2%	0.0%	0.0%
39095007901	16.8%	0.7%	0.0%	0.0%	39.8%	10.2%	0.0%	0.0%
39095007903	11.7%	0.0%	0.0%	0.0%	14.7%	0.0%	0.0%	0.0%
39095007904	24.1%	0.0%	0.0%	0.0%	76.3%	0.0%	0.0%	0.0%
39095008000	23.2%	0.0%	0.0%	0.0%	51.9%	0.0%	0.0%	0.0%
39095008302	11.8%	0.0%	0.0%	0.0%	75.9%	0.0%	0.0%	0.0%
39095008303	17.3%	1.1%	0.0%	0.0%	42.7%	0.0%	0.0%	0.0%
39095008304	18.7%	0.0%	0.0%	0.0%	34.9%	1.9%	0.0%	0.0%
39095008401	10.6%	0.0%	0.0%	0.0%	53.9%	0.0%	0.0%	0.0%
39095008501	12.9%	0.0%	0.0%	0.0%	46.4%	0.0%	0.0%	0.0%
39095008502	9.8%	0.0%	0.0%	0.0%	35.9%	1.2%	3.2%	0.0%
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39095008602	14.2%	0.0%	0.0%	0.0%	28.1%	0.3%	0.0%	0.0%
39095009902	25.3%	0.0%	0.0%	0.0%	2.2%	0.0%	0.0%	0.0%
39095010200	20.3%	0.0%	0.0%	0.0%	34.5%	6.4%	0.0%	0.0%
39095010300	21.0%	5.9%	0.0%	0.0%	52.6%	5.1%	0.0%	0.0%
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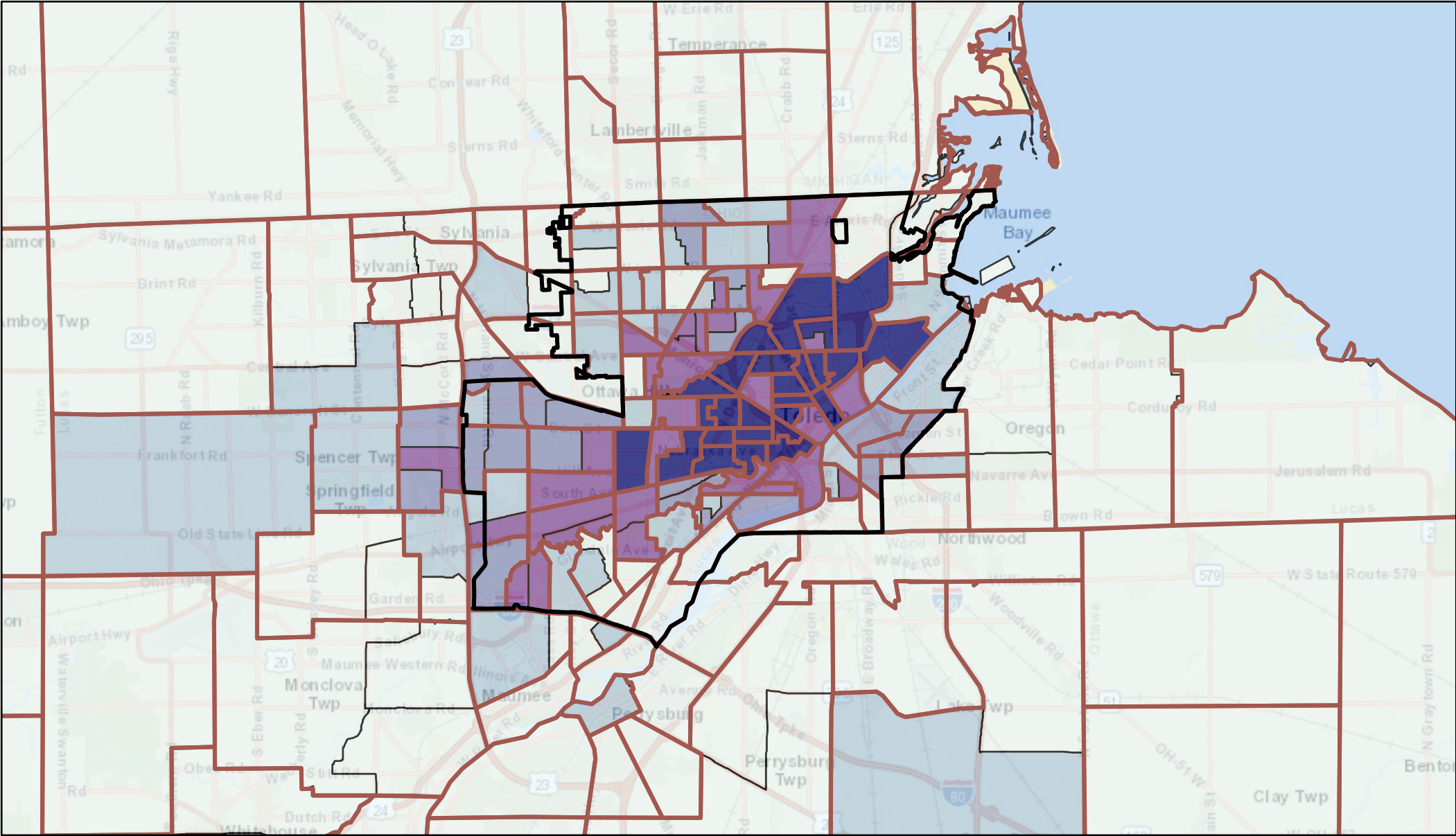
Data Source: 2019-2023 ACS – B25123

**MAPS**

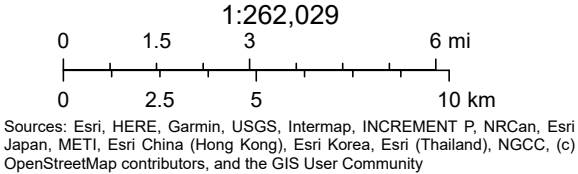
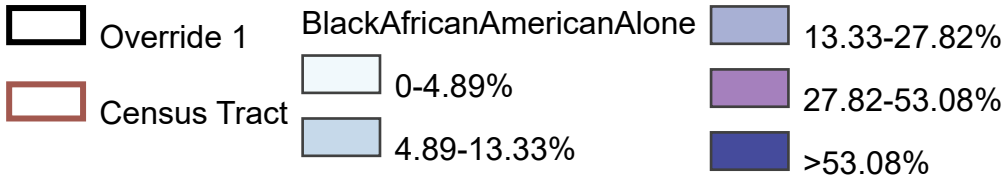




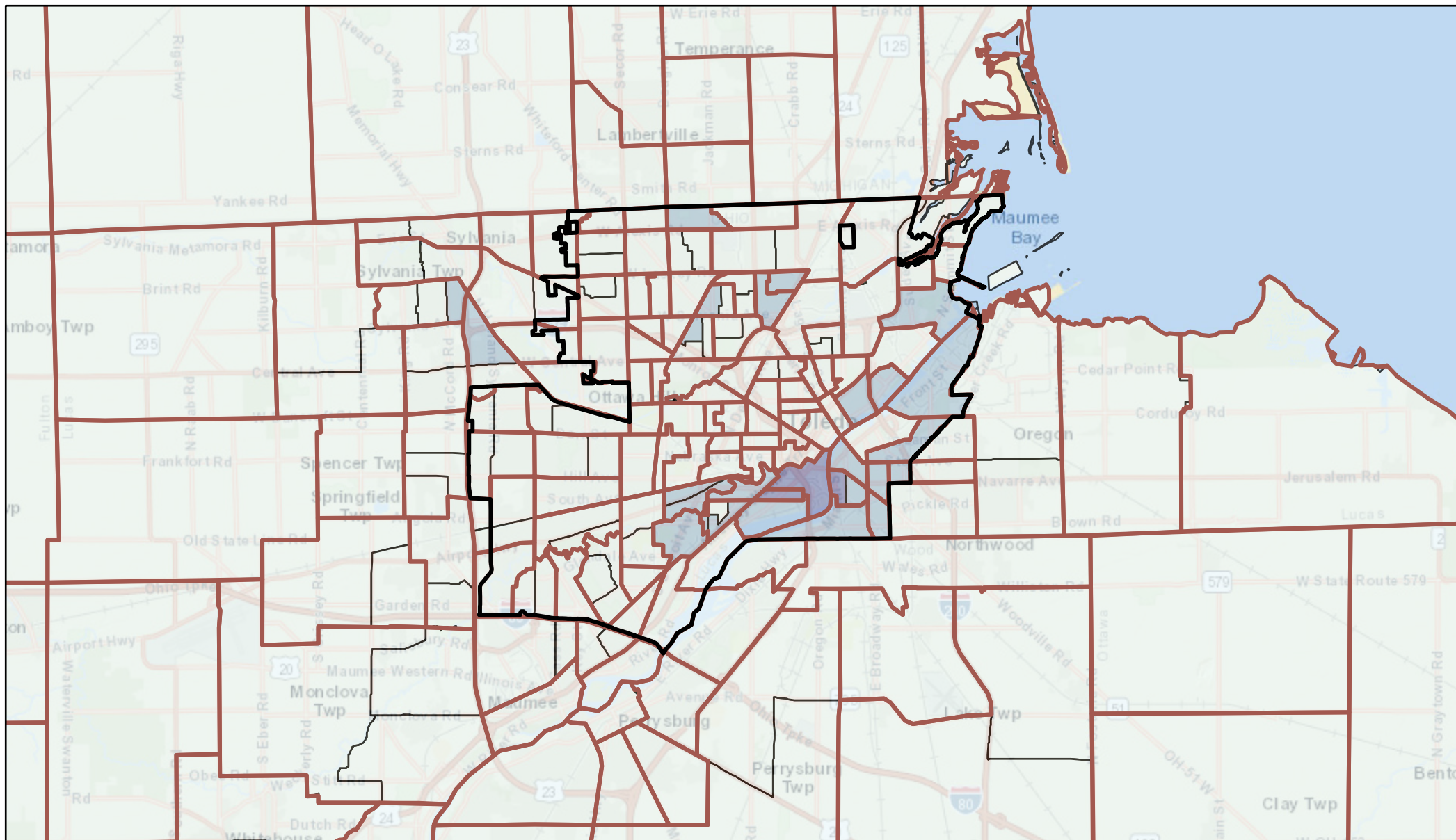
Black or African American Population in Toledo - Concentration of Minorities per Census Tract



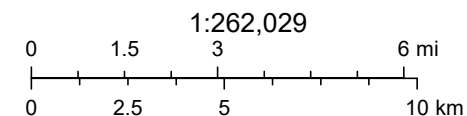
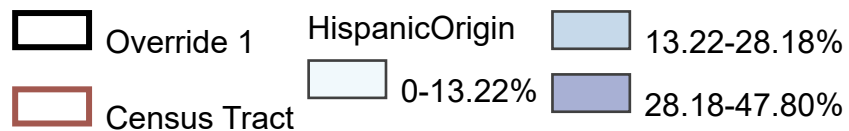
May 10, 2024



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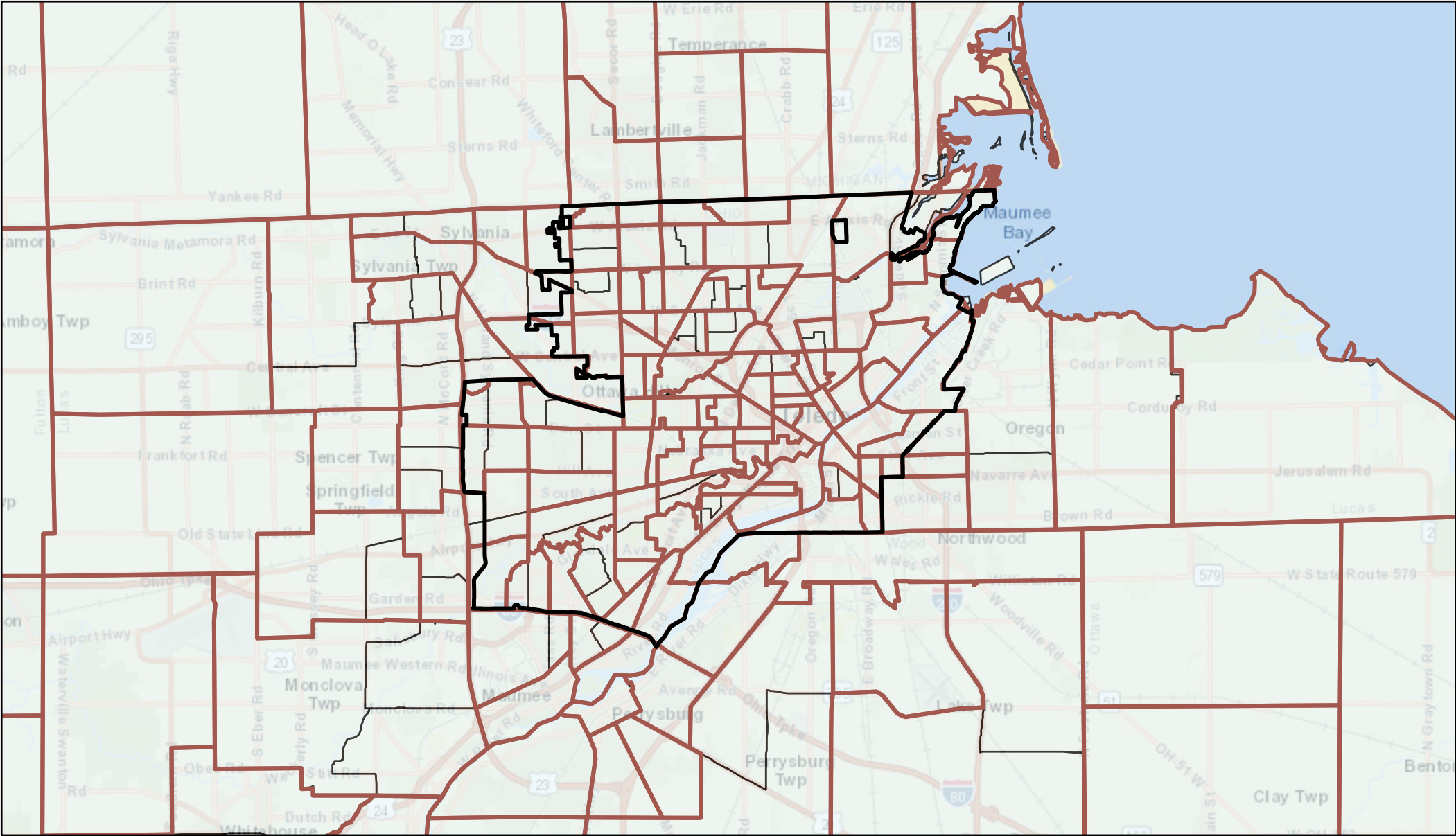
May 10, 2024







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



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



May 10, 2024

-  Override 1
-  Census Tract
-  NativeHawaiianPacificIslanderAlone
-  0-2.28%

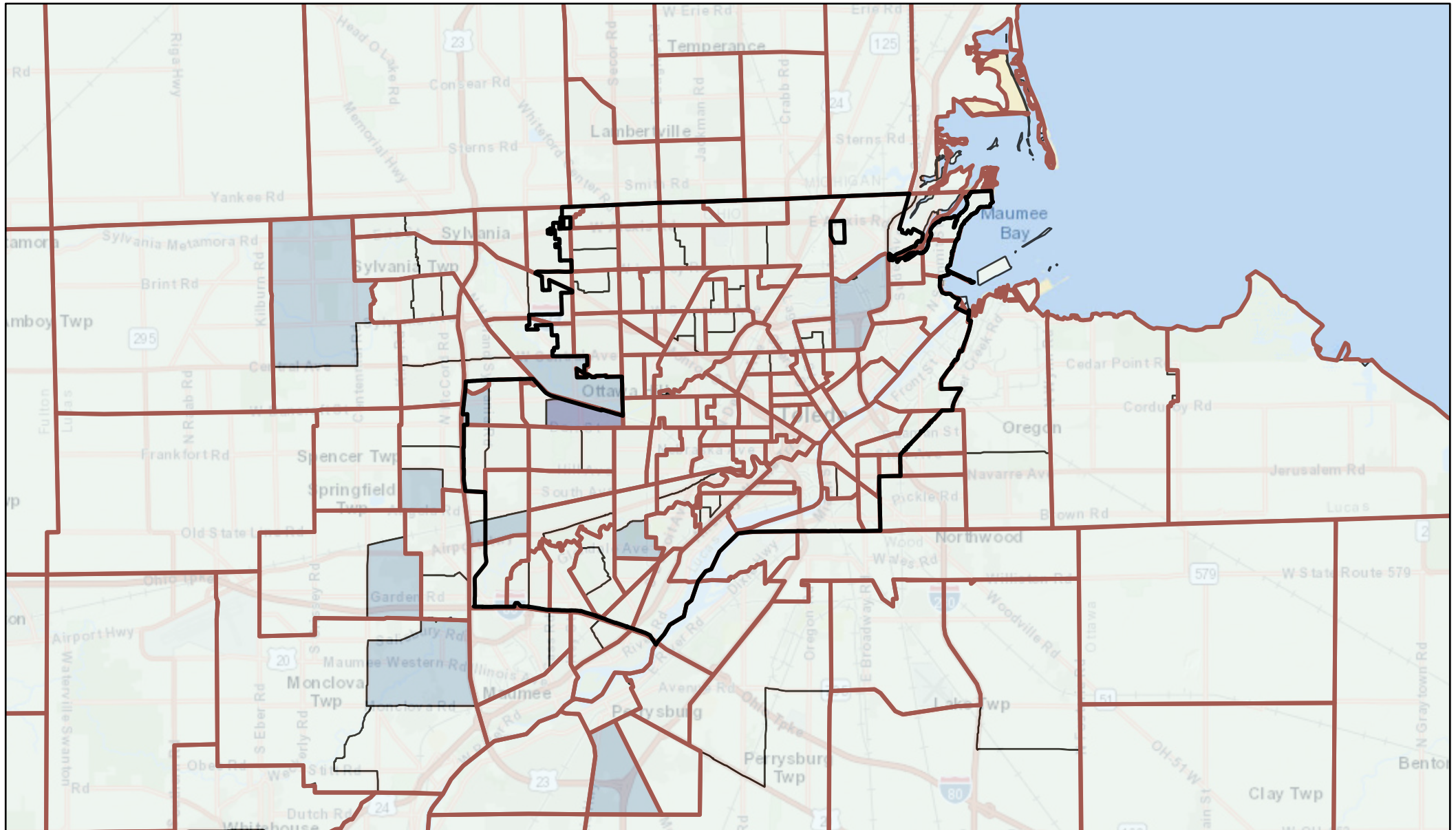
1:262,029

0 1.5 3 6 mi

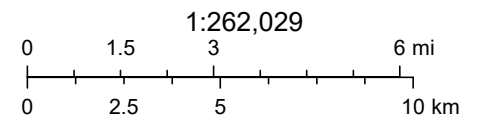
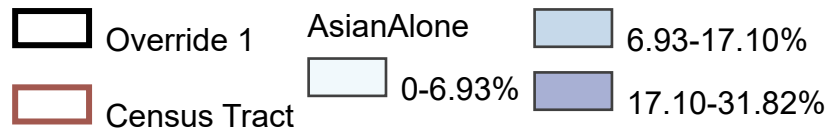
0 2.5 5 10 km

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

# Asian Population in Toledo - Concentration of Minorities per Census Tract



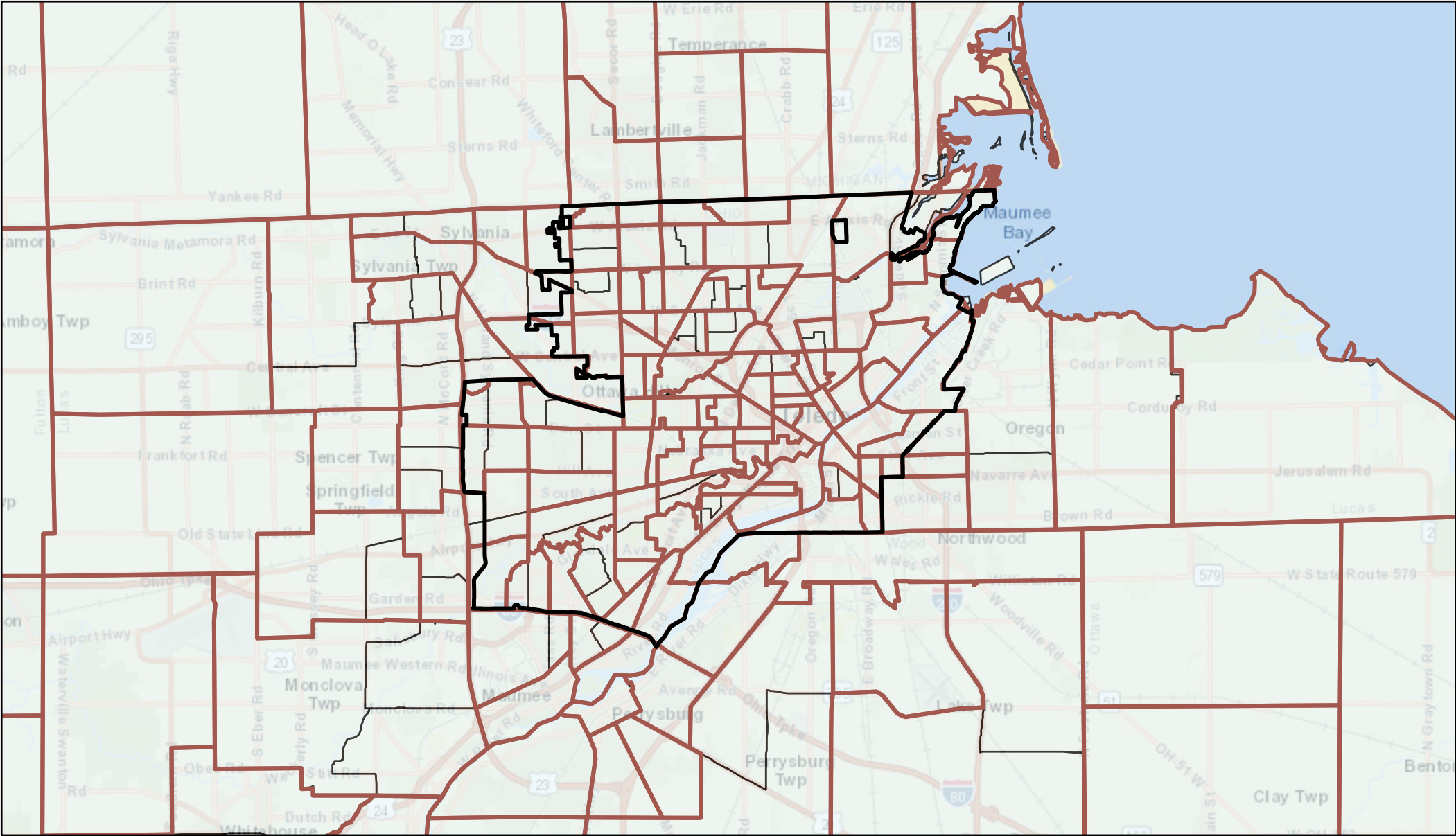
May 10, 2024







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



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



May 10, 2024

-  Override 1
-  Census Tract
-  AmericanIndianAlaskaNativeAlone
-  0-2.48%

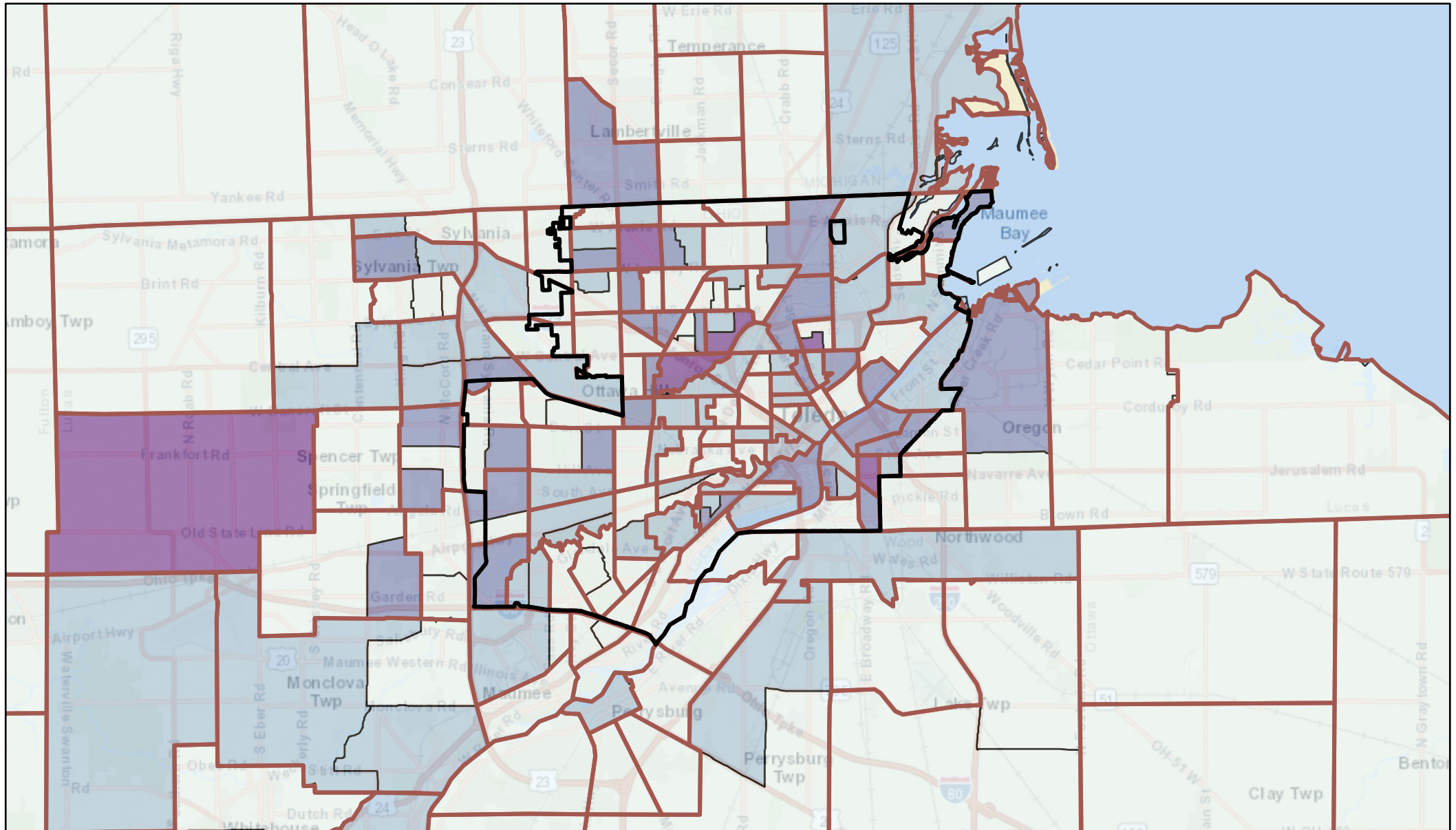
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0 1.5 3 6 mi

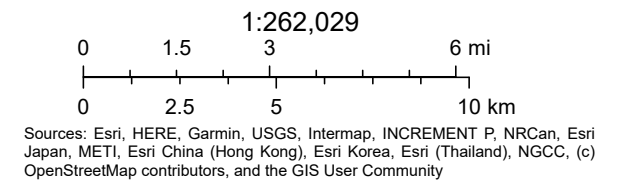
0 2.5 5 10 km

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

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

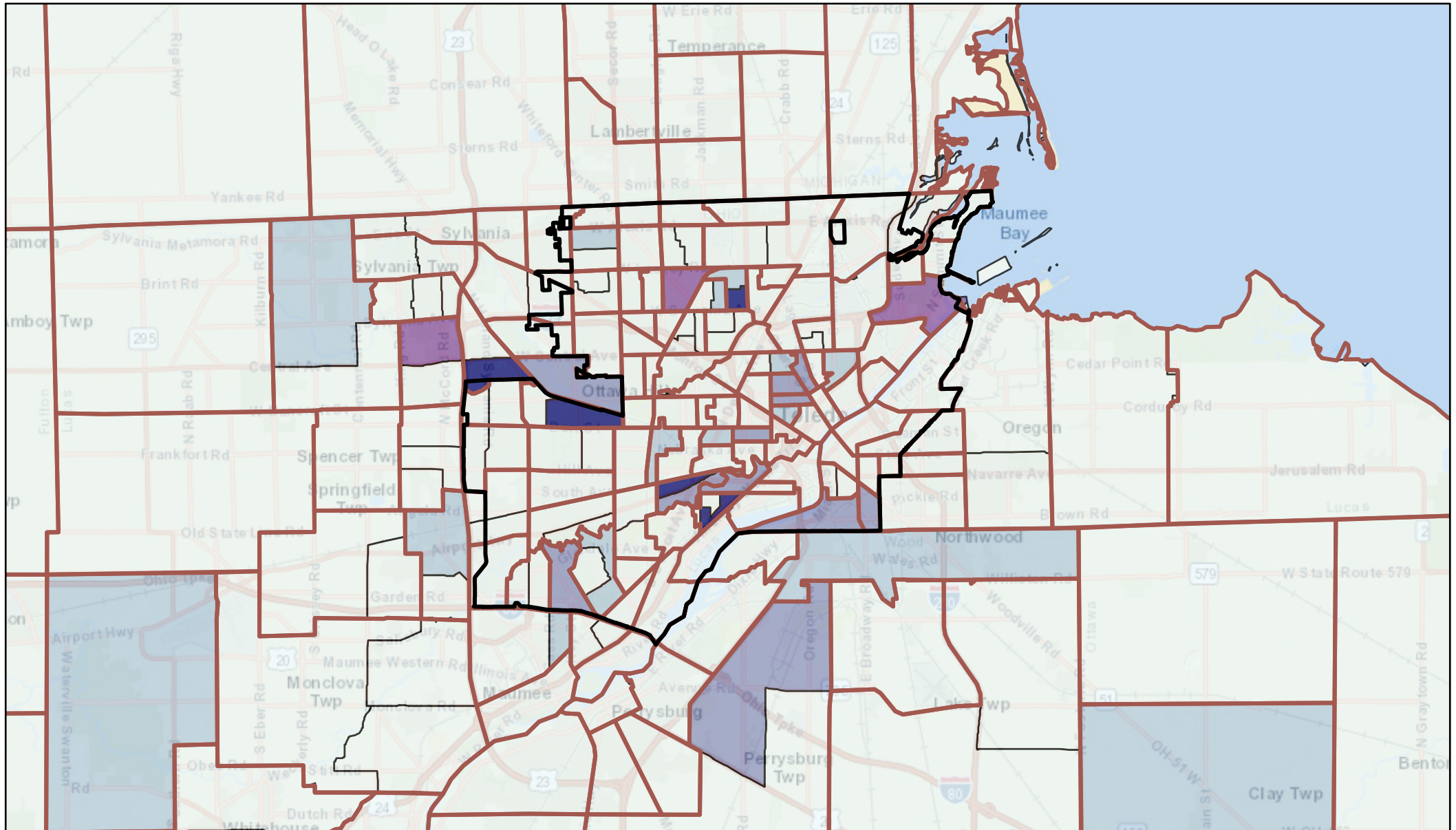


May 10, 2024

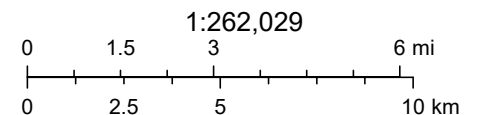
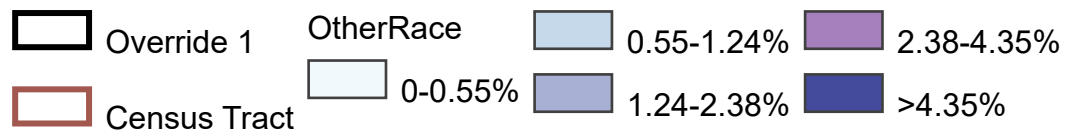




# Some Other Race Alone Population in Toledo - Concentration of Minorities per Census Tract



May 10, 2024



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

**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>.

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

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

#### Rent Determination Procedures

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

#### Required Documentation

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

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

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

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

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

#### Assessment/ Prioritization

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

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

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

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

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

## CoC Recommendations

### *Service Provision Criteria:*

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

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

## Required Documentation

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

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

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	<b>Category 1</b>	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> <li>• Has a primary nighttime residence that is a public or private place not meant for human habitation;</li> <li>• 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</li> <li>• 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</li> </ul>
	<b>Category 2</b>	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"> <li>• Residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>• No subsequent residence has been identified; and</li> <li>• The individual or family lacks the resources or support networks needed to obtain other permanent housing</li> </ul>

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



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

HUD DEFINITION FOR AT-RISK OF HOMELESSNESS	<b>Category 1</b>	Individuals and Families	<p>An individual or family who:</p> <p>Has an annual income below 30% of median family income for the area; <b>AND</b></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; <b>AND</b></p> <p>Meets one of the following conditions:</p> <ul style="list-style-type: none"> <li>A. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding their application for assistance; <b>OR</b></li> <li>B. Is living in the home of another because of economic hardship; <b>OR</b></li> <li>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; <b>OR</b></li> <li>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: <b>OR</b></li> <li>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; <b>OR</b></li> <li>F. Is exiting a publicly funded institution, or system of care;</li> </ul> <p><b>OR</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>
	<b>Category 2</b>	Unaccompanied Children and Youth	<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>

	<b>Category 3</b>	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"> <li>• Category 1 – Literally Homeless</li> <li>• Category 2 – Imminent Risk of Homeless</li> <li>• Category 3* – Homeless Under Other Federal Statutes</li> <li>• Category 4 – Fleeing/Attempting to Flee DV</li> </ul>
	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"> <li>• Category 1 – Literally Homeless</li> <li>• Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)</li> </ul> <p>ESG-funded RRH projects have the following additional limitations on eligibility:</p> <ul style="list-style-type: none"> <li>• Must only serve individuals and families that have an annual income at or below 50% of AMI</li> </ul>
	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"> <li>• Category 1 – Literally Homeless</li> <li>• Category 2 – Imminent Risk of Homeless</li> <li>• Category 3* – Homeless Under Other Federal Statutes (N/A OH-501 Toledo/Lucas County CoC*)</li> <li>• Category 4 – Fleeing/Attempting to Flee DV</li> </ul>

	<b>Permanent Supportive Housing</b>	<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"> <li>• Category 1 – Literally Homeless</li> <li>• Category 4 – Fleeing/Attempting to Flee DV</li> </ul> <p>PSH projects have the following additional NOFO limitations on eligibility within Category 1:</p> <ul style="list-style-type: none"> <li>• Individuals and Families coming from TH must have originally come from the streets or emergency shelter</li> <li>• Individuals and Families must also have an individual family member with a disability</li> </ul> <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)

<b>ELIGIBILITY BY COMPONENT</b> (Emergency Solutions Grants)	<b>Street Outreach</b>	<p>Individuals defined as Homeless under the following categories are eligible for assistance in SO:</p> <ul style="list-style-type: none"> <li>• Category 1 – Literally Homeless</li> <li>• Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)</li> </ul> <p>SO projects have the following additional limitations on eligibility within Category 1:</p> <ul style="list-style-type: none"> <li>• 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</li> </ul>
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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"> <li>• Category 1 – Literally Homeless</li> <li>• Category 2 – Imminent Risk of Homeless</li> <li>• Category 3 – Homeless Under Other Federal Statutes</li> <li>• Category 4 – Fleeing/Attempting to Flee DV</li> </ul>
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"> <li>• Category 1 – Literally Homeless</li> <li>• Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)</li> </ul> <p>ESG-funded RRH projects have the following additional limitations on eligibility:</p> <ul style="list-style-type: none"> <li>• Must only serve individuals and families that have an annual income at or below 50% of AMI</li> </ul>

	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"> <li>• Category 2 –Imminent Risk of Homeless</li> <li>• Category 3 – Homeless Under Other Federal Statutes</li> <li>• Category 4 – Fleeing/Attempting to Flee DV</li> </ul> <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"> <li>• Must only serve individuals and families that have an annual income below 30% of AMI</li> </ul>
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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	Category 1	Literally Homeless	<p>a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); <b>OR</b></p> <p>b. Written observation by an outreach worker; <b>OR</b></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>
	Category 1: Risk Factor (C)	Category 1: Risk Factor (C) of the At-Risk of Homelessness	<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. <b>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.</b></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>

	<b>Category 2</b>	Imminent Risk of Homelessness	<ul style="list-style-type: none"> <li>a. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; <b>OR</b></li> <li>b. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; <b>OR</b></li> <li>c. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; <b>AND</b></li> <li>d. Certification that no subsequent residence has been identified;</li> </ul> <p><b>AND</b></p>
			<ul style="list-style-type: none"> <li>e. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.</li> </ul>
	<b>Category 3</b>	Homeless under other Federal statutes	<p><b>CoC-funded projects - N/A (Ineligible)</b></p> <p><b>ESG-funded projects (ONLY shelter or prevention IF allowed):</b></p> <ul style="list-style-type: none"> <li>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; <b>AND</b></li> <li>ii. Certification of no PH in the last 60 days; <b>AND</b></li> <li>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; <b>AND</b></li> <li>iv. Documentation of special needs or 2 or more barriers</li> </ul>

	<b>Category 4</b>	Fleeing/ Attempting to Flee DV	<p><b>For victim service providers:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>For non-victim service providers:</b></p> <ul style="list-style-type: none"> <li>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</li> <li>ii. Certification by the individual or head of household that no subsequent residence has been identified; AND</li> <li>iii. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.</li> </ul>
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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-Docmentation-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"> <li>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;</li> <li>b. Up to 3 months of homelessness may be documented through self- certification;</li> <li>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;</li> <li>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;</li> <li>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.</li> </ul>
	Documenting time spent in institutions	<ul style="list-style-type: none"> <li>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; <b>OR</b></li> <li>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.</li> </ul>
	Documenting breaks in homelessness	<ul style="list-style-type: none"> <li>a. Third party verification; <b>OR</b></li> <li>b. Self-reporting by the individual seeking assistance. It is acceptable for all breaks to be documented through self-reporting.</li> </ul>

	Documenting the existence of a disability	<p>This must be third party, and includes:</p> <ul style="list-style-type: none"> <li>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; <b>OR</b></li> <li>b. Written verification from SSA; <b>OR</b></li> <li>c. The receipt of a disability check; <b>OR</b></li> <li>d. Intake staff recorded observation of a disability that is confirmed and accompanied by evidence outlined in a-c above within 45 days.</li> </ul>
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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

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*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.*

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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**

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**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.<sup>1</sup>

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**

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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/>.

<sup>3</sup> 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.

# **Toledo Homeless Management Information System (HMIS)**

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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 Mediware 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.

# **Toledo Homeless Management Information System (HMIS)**

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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.

# Toledo Homeless Management Information System (HMIS)

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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.

# Toledo Homeless Management Information System (HMIS)

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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

# Toledo Homeless Management Information System (HMIS)

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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.

# Toledo Homeless Management Information System (HMIS)

## Consolidated Policies and Procedures

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://endinghomelessness Toledo.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 constant at admission or as soon as possible unless there are reasons to delay contact with guardian.

Referrals may come from a variety of sources. Youth may just appear at Safety Net and will be assessed.

While at Safety Net, the youth will be provided with:

- **Gateway services**, providing food, shelter, clothing, transportation and hygiene-related items;

- **Assessment services and intensive coordinated case management**, ensuring youth receive assistance with emotional and behavioral health challenges while developing a plan for permanency;
- **Continuum service linkages**, ensuring the ability to provide services as a community to the target population; and
- **Follow-up/aftercare services**, providing three months of follow-up services to youth, including a plan to exit, permanent placement and personal goals.

Youth will be screened within their first two days in the shelter by staff; the results of these screens will be used to inform the service planning process, including the need for further assessment. Clinical assessment for behavioral health will be provided by staff within Zepf Center's youth services department.

Shelter staff will collaborate with the youth to develop an exit plan. Part of the exit planning process will be to ask the youth to discuss their plans for either reunification with the parents/ guardian or to consider options for a safe and stable living situation if reunification is not possible. 90 days of follow up/aftercare services will be provided for youth who receive shelter services or are provided alternative living arrangements, regardless of their length of stay in the shelter.

# **Toledo Lucas County Continuum of Care: Recommendations for Collaborative Governance of Coordinated Assessment**

## **Original Document Prepared by**

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## **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.

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### **Document History**

Document Prepared by

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## Toledo Lucas County Continuum of Care: Recommendations for Centralized Approach to Coordinated Access/Entry

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### 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.

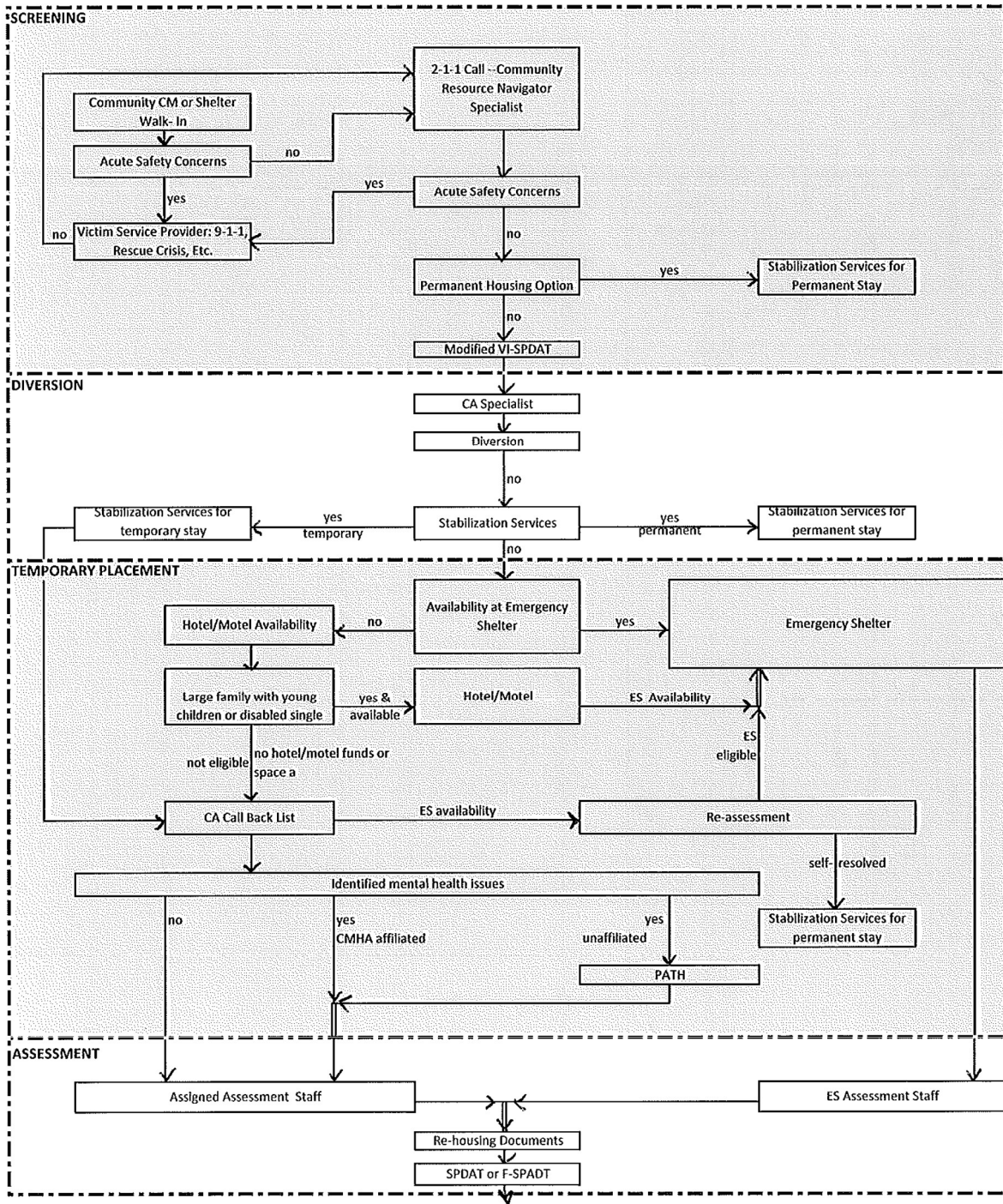
#### Mutual Responsibility for Appropriate Referrals

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



Recommendations for Centralized Approach to Coordinated Access-Entry/Approved by Toledo Lucas County Homelessness Board on 22 August 2012/

Amended version recommended by HCN on 18 October 2017/Amended by Toledo Lucas County Homelessness Board on 15 November 2017

