



July 1, 2021 - June 30, 2022 Draft CAPER

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

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Executive Summary

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

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

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

This year-end report provides an assessment of the accomplishments and financial expenditures for Program Year (PY) 2021 for the COT, encompassing July 1, 2021 through June 30, 2022. This report provides information to HUD and residents of the City of Toledo on funded programs and contains a comparison of actual accomplishments versus the goals of the five-year strategic and one-year plans.

For PY 2021-2022, the COT partnered with many agencies/organizations to address and accomplish the priorities of the Consolidated Plan. Additionally, other local, state and federal organizations provided funds in the COT toward these same priorities, assisting to leverage the dollars received through HUD. Most efforts were dedicated to the following highest priorities:

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

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

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

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

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

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

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

The COT's 2021 (47th) PY, encompassing July 1, 2021 through June 30, 2022, represents the 2nd year of the 2020-2024 Five-Year Consolidated Plan. The overall projects selected for funding were based not only on their ability to stimulate neighborhood revitalization, community development and economic growth, but also whether they addressed a priority goal identified in the 2020-2024 Five-Year Consolidated Plan.

Despite the continued challenges endured by the City as a result of the 2020 Pandemic and subsequent variants, the City was able to demonstrate continued progress in the 2021-2022 Annual Action Plan and 2020-2024 Five-Year Consolidated Plan projects.

The COT received CARES Act funding to be used to prevent, to prepare for or to respond to the Coronavirus (COVID-19). The city received **\$5,979,865** in Community Development Block Grant (CDBG-CV) funding and **\$4,875,338** in emergency Solutions Grant (ESG-CV) funding. Of those funds received the city has expended **\$4,212,823** of CDBG-CV and **\$4,056,845** of ESG-CV.

The first substantial amendment, included CDBG-CV and ESG-CV funding. With the CDBG-CV funding, the city was able to use these funds to fund activities such as: Business Assistance; Emergency Rental Assistance; Testing; Supplies/Cleaning; Food Security; Youth, Senior, Special Populations Assistance; Legal Support, Outreach, etc. With the ESG-CV funding, the activities funded included: Emergency Rental Assistance, CoC Collaborative, Equipment, Supplies, Case Management and Street Outreach. Some accomplishments through the use of CDBG-CV funds included: Business Assistance - **25** businesses assisted; Legal Support - **120** persons assisted; Food Security - **31,220** persons assisted; Emergency Rental Assistance - **375** persons assisted; and Personal Protection Equipment (PPE) - **3,912** persons assisted. With the use of ESG-CV, some accomplishments include: Emergency Rental Assistance - **406** persons assisted; Equipment - **690** persons assisted; Street Outreach - **370** persons assisted.

The second substantial amendment, included CDBG-CV funding. With this CDBG-CV funding, the city implemented the Emergency Mortgage Assistance Program (EMAP) to stabilize owner-occupied housing for the families during the continued pandemic crisis. During program year 2021, **43** families were assisted for a total of \$237,967.50 disbursed.

The third substantial amendment, included ESG-CV funding. The city of Toledo in partnership with Toledo Public Schools (TPS), Toledo Lucas County Homelessness Board (TLCHB) and Lutheran Social Services of Northwestern Ohio provided housing stabilization assistance to the families of TPS students. During the 2021 program year **200** families were assisted.

There was an abundance of time and energy put into designating Neighborhood Revitalization Strategic Areas (NRSA's) during the 2020 program year. Several meetings have taken place with representatives from three neighborhoods - Junction/Englewood, Old South End and the East Side. During the 2021 program year, the Department of Housing and Community Development continued to push forward with

the finalizing of the NRSA's. Per CPD Notice 16-16, the Department consulted with the HUD field office through letters, emails and meetings. As a result of the consultations and HUD NRSA eligibility criteria, the Old South End and Englewood areas were selected as the proposed NRSA's. The NRSA draft plan will be available for public view and comment prior to submission to HUD for final approval.

The City continues to emphasize providing adequate, safe and affordable housing; elimination of homelessness; public infrastructure improvements; implementing the Fair Housing Action Plan (FHAP); and, assistance of basic needs such as food, life skills, and healthcare based upon the priorities established in the Five-Year Consolidated Plan.

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

Through the use of HOME Investment Partnerships Program (HOME) funds homeownership continues to be addressed. The department assisted **69** new homebuyers to purchase houses. In addition, the homeowners participated in the completion of an eight-hour, HUD mandated homeownership training session. The training conducted by a qualified HUD-approved counseling agency provided the new homeowners with knowledge on how to understand the property purchasing process and financial requirements of homeownership.

Community-Garden funded activities continue to reduce blight and beautify neighborhoods. The increase in the availability of fresh produce strengthens the community by engaging residents, promoting a sense of ownership and stewardship in low-income neighborhoods. The number of persons served through community-garden funded activities was **3,911**.

Economic Development activities included in the goals assisted businesses with technical assistance, grants and the creation of jobs. The Department of Economic Development for the period of July 2021 through June 2022 assisted **52** businesses and **8** jobs were created.

Through the Enterprise Development Loan (EDL) program, the Department of Economic Development received **six (6)** applications. Of the **six (6)**, **three (3)** businesses (two restaurants and one salon) was assisted. The other **three (3)** were not eligible for the program. The work completed included a buildout of their space and the purchase of restaurant equipment.

The City also assisted businesses through the Business Incentive Grant (BIG). The Department of Economic Development through its BIG program aided **11** businesses with the assistance of CDBG funds. The Department also provided technical assistance. The scope of work ranged from façade improvements, windows, doors, awnings, painting, garage doors and tuck pointing.

A new initiative through the Department of Economic Development is the White Box program. The White Box Grant helps property owners to bring vacant commercial buildings first floor spaces into compliance with the current state and local building codes, fire safety codes and accessibility requirements. Currently, with the use of CDBG funds the Department of Economic Development is assisting **one** business in completing its buildout under the White Box program.

In addition, **three (3)** applicants were awarded incentives through the Toledo Expansion Incentive (TEI). For **17** applicants or potential applicants not eligible for assistance, efforts were made to get those applicants to the Toledo Regional Chamber of Commerce, Small Business Development Center. There were **14** businesses that are currently being assist by Economic Development or if no assistance could be provided were referred to other agencies.

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

During Program Year 2021, TLCERAP disbursed approximately **\$19.75** million in rental and utility expenses for **3,006** LMI households in Toledo and Lucas County. Over 7,000 applications were submitted during this reporting period. The program will be active at minimum through December 29, 2022.

The Housing Division developed and implemented a lead-safe marketing campaign and launched the Toledo Lead Safe Website (www.ToledoLeadSafe.com) in October 2020 for Lead Poisoning Prevention Week. The division also created and streamlined the process with the Health Department for lead-safe certification and local lead inspector registration.

In partnership with Toledo Lead Poisoning Prevention Coalition, a Workforce Development Committee was created. Members included are: Lucas County Ohio Means Jobs, Local Lead inspectors, small business program administrators, and Toledo Rotary Club. The committee has met monthly since November 2020 and on average 10 people attended every meeting from the various agencies. Clearance Technician training and small business class was offered in June, 2022, at no cost to students. 26 participants went through the class and are scheduled to take the Ohio Department of Health Clearance Technician exam.

Additionally, the Early Bird Match Grant was implemented to provide rental owners assistance with compliance costs under the new local lead ordinance by providing a 50% match on compliance costs, up to \$5,000 per rental unit, for units rented to low- to moderate-income tenants. Four (**4**) out of six (**6**) applications received were approved and two denied. Funds are still available.

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

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

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

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

The accomplishments table prescribed by HUD has been updated and contains comparison of actual accomplishments vs. the goals of the Five-Year Consolidated Plan and one-year annual action plans. The following table represents **Preliminary Data** related to accomplishments for the 2021 (47th) program year. The final data will be included in the final version of this CAPER.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2021-2022 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Business Recruitment/ Retention Assistance	Non-Housing Community Development	CDBG: \$66,810	Other	Other	0	0	0%	7	0	0%
Code Enforcement & Nuisance Abatement incl. Rental	Non-Housing Community Development	CDBG: \$1,378,912	Housing Code Enforcement/ Foreclosed Property Care	Household Housing Unit	200,000	89,416	45%	40,000	42,034	105%
Coordinated Access for Homelessness	Homeless Non-Housing Community Development	ESG: \$396,921	Other	Other	1	1	100%	1	1	100%
Demolition/ Clearance in Citywide Low-Income Areas	Non-Housing Community Development	CDBG: \$225,000	Buildings Demolished	Buildings	40	16	40%	1	0	0%
Establish and Maintain Community Gardens	Non-Housing Community Development	CDBG: \$141,780	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,880	6,947	44%	3,176	3,911	123%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2021-2022 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Fair Housing Planning & Services	Non-Housing Community Development	CDBG: \$200,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	17,535	4,059	24%	4,007	1,722	43%
HOME Administration	Affordable Housing Public Housing Homeless	HOME: \$217,998	Other	Other	1	1	100%	1	1	100%
Home Buyer Down Payment/Closing Costs Assistance	Affordable Housing	HOME: \$200,000	Direct Financial Assistance to Homebuyers	Households Assisted	122	116	95%	30	70	233%
HOME CHDO Set-aside	Affordable Housing	HOME: \$326,996	Homeowner Housing Added	Household Housing Unit	21	1	5%	5	0	0%
Home Repairs for Seniors and the Disabled	Affordable Housing Non-Homeless Special Needs	CDBG: \$475,207	Homeowner Housing Rehabilitated	Household Housing Unit	540	240	45%	108	128	119%
HOME: Home Buyer Development	Affordable Housing	HOME: \$150,000	Homeowner Housing Added	Household Housing Unit	5	9	180%	1	0	0%
Housing Rehabilitation Administration – CDBG	Affordable Housing	CDBG: \$968,557	Other	Other	1	1	100%	1	1	100%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2021-2022 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Housing Repairs and Rehabilitation	Affordable Housing	CDBG: \$820,000 HOME: \$42,497	Homeowner Housing Rehabilitated	Household Housing Unit	1,363	375	28%	110	197	179%
Housing/services for non-homeless special need pop	Affordable Housing Non-Homeless Special Needs	CDBG: \$0 HOME: \$0 ESG: \$0	Other	Other	0	0	0%	0	0	0%
Improved Neighborhoods by Comprehensive Planning	Non-Housing Community Development	CDBG: \$138,069	Other	Other	1	4	400%	2	3	150%
Improvements to parks and community facilities	Non-Housing Community Development	CDBG: \$366,200	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	60,000	7,949	14%	11,000	7,949	73%
			Other	Other	5	4	80%	5	4	80%
Improvements to public infrastructure for LMI	Non-Housing Community Development	CDBG: \$401,354	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	532	426%	512	520	102%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2021-2022 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Increase in transitional housing	Affordable Housing Homeless	CDBG: \$85,500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	110	52	48%	22	30	137%
Increase number of emergency shelters	Affordable Housing Homeless	CDBG: \$62,000	Homeless Person Overnight Shelter	Persons Assisted	2,945	820	28%	589	405	69%
Increase or new public services	Non-Housing Community Development	CDBG: \$822,837	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	169,377	33,850	20%	14,000	13,096	94%
Job Creation/Retention incl. returning citizens	Non-Housing Community Development	CDBG: \$0	Jobs created/retained	Jobs	7	15	215%	7	8	115%
Large rental housing/low-income housing tax credit	Affordable Housing	HOME: \$1,198,530	Rental units rehabilitated	Household Housing Unit	15	7	47%	10	6	60%
Local affordable housing capacity - public services	Affordable Housing	CDBG: \$21,410	Other	Other	8	0	0%	0	0	0%
Permanent Supportive Housing	Affordable Housing Homeless	CDBG: \$0	Housing for Homeless added	Household Housing Unit	810	52	6%	0	0	0%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2021-2022 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Planning and Administration - CDBG	Affordable Housing	CDBG: \$1,230,634	Other	Other	1	1	100%	1	1	100%
	Public Housing									
	Homeless									
	Non-Homeless Special Needs									
	Non-Housing Community Development									
Rapid Re-Housing and Direct Financial Assistance	Affordable Housing	ESG: \$248,695	Tenant-based rental assistance/ Rapid Rehousing	Households Assisted	620	267	43%	25	175	700%
	Homeless	HOME: \$43,956								
Slum and blight reduction	Non-Housing Community Development	CDBG: \$108,745 Land Bank: \$1,650,000	Housing Code Enforcement/For enclosed Property Care	Household Housing Unit	5,750	3,082	54%	1,000	1,490	149%
Small rental housing financing and education	Affordable Housing	HOME: \$75,000	Rental units rehabilitated	Household Housing Unit	12	6	50%	3	1	34%
Supplement Lead Hazard Grants for At Risk Families	Affordable Housing	CDBG: \$0	Homeowner Housing Rehabilitated	Household Housing Unit	150	4	3%	0	0	0%
	Lead Remediation Rehab									

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2021-2022 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Targeted Neighborhood Home Repairs	Affordable Housing	CDBG: \$0	Homeowner Housing Rehabilitated	Household Housing Unit	40	16	40%	0	0	0%
Targeted Neighborhood Slum and Blight Reduction	Non-Housing Community Development	CDBG: \$0	Other	Other	1	1	100%	0	0	0%
Transportation support	Non-Housing Community Development	CDBG: \$5,500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,050	240	23%	110	0	0%

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

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

The COT, as an entitlement community, received **\$7,593,515** in Community Development Block Grant (CDBG) funds plus **\$191,169** in program income, **\$2,179,977** in HOME Investment Partnerships Program (HOME) and **\$645,616** in Emergency Solutions Grant (ESG) for the 2021 (47th) program year. The activities carried out responded to the goals identified in the 2020-2024 Five-Year Consolidated Plan and 2021 Annual Action Plan. The DHCD evaluated each project funded to ensure eligibility and compliance with CDBG, HOME, and ESG regulations. Potential applicants requesting funding are educated on the priority needs and goals as identified in the Five-Year Consolidated Plan. Each application funded must meet one of the priorities of the 2020-2024 Five-Year Consolidated Plan.

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

The goals listed above in Table 1 represent the accomplishments during the program year 2021 for progress towards the goals established in the 2020-2024 Consolidated Plan and 2020 Annual Action Plan.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

The table below represents **Preliminary Data** related to racial and ethnic composition the individuals and families assisted in the 2021 (47th) PY. The final data will be included I the final version of this CAPER.

	CDBG	HOME	ESG
White	40,388	47	257
Black or African American	33,807	77	534
Asian	72	0	1
American Indian or American Native	273	1	8
Native Hawaiian or Other Pacific Islander	39	0	1
Total	74,579	125	801
Hispanic	4,861	6	196
Not Hispanic	69,718	119	605

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

Narrative

The table represents **Preliminary Data** related to those individuals and families assisted with CDBG, HOME ESG and CDBG-CV.

The data shows that under CDBG **46%** and HOME **62%** are minorities (mostly Black or African American). Additionally, CDBG **7%** and HOME **5%** are Hispanic.

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

- American Indian/Alaskan Native & White - **22**
- Asian & White - **2**
- Black/African American & White - **2,035**
- American Indian/Alaskan Native & Black/African American - **18**
- Other Multi-Racial - **4,531**

Of the above categories not reflected in the table **2,917** or **44%** of the persons or families served was Hispanic. Through the use of CDBG-CV funding, the City had a significant increase in the number of individuals and families assisted.

The ESG racial composition of beneficiaries reported above can be seen in the SAGE report. For the ESG, **64** individuals reported being of multiple races and **26** individuals “refused” to provide information. The data shows that **66%** of those served were Black or African American and **24%** were Hispanic.

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

The COT, in adherence to HUD regulations, allocated at least 70% of its 2021-2022 CDBG entitlement award to programs that directly benefitted low- and moderate-income individuals and families. Of those served, 99% were low- and moderate-income residents of Toledo.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

The table below represents *Preliminary Data* related to amounts expended in the 2021 (47th) PY. The final data will be included in the final version of this CAPER.

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	11,011,044	10,699,531
HOME	public - federal	5,898,791	3,932,869
ESG	public - federal	702,924	641,049
Competitive McKinney-Vento Homeless Assistance Act	public - federal	400,000	400,000
Continuum of Care	public - federal	3,955,340	3,428,721
Other - Land Bank	public - local	1,650,000	1,037,000

Table 3 - Resources Made Available

Narrative

The table above represents the amount of resources available and the *Preliminary* amounts expended in 2021 (47th) PY. Under Other, these include expenditures through the Land Bank.

For Continuum of Care (CoC), the CoC partners that receive this funding contract and request draws directly from HUD. Some CoC Partners have start dates that vary from the CAPER reporting period and are early in their program year/expenditure cycle.

The city of Toledo also received CARES Act funding to be used to prevent, to prepare for or to respond to the Coronavirus (COVID-19). The city received **\$5,979,865** in Community Development Block Grant (CDBG-CV) funding and **\$4,875,338** in emergency Solutions Grant (ESG-CV) funding. Of those funds received the city has expended **\$4,212,823** of CDBG-CV and **\$4,056,845** of ESG-CV.

The city of Toledo is also spending down funds from a 2017 HUD Lead Hazard Control and Healthy Homes grant. The amount expended for this program was **\$950,121**. The grant has been closed out with HUD. Total amount expended for this grant that addressed Lead Hazards and improved Healthy Homes is **\$2,467,593**.

Other grant funding received were: In January 2021, from the Greater Toledo Community Foundation a grant in the amount of **\$46,033** to support the position of the Lead Safe Coordinator. The entire amount was expended during this program year. In April 2021, HUD Healthy Home & Weatherization grant was received - **\$1 million** grant for a pilot program that will bridge the Lead Hazard Control and Healthy Homes grant administered by the DHCD and in partnership with the Weatherization Assistance Program (WAP) administered by NeighborWorks Toledo Region; **\$27,802** has been expended. Additionally, working in partnership with Toledo Lucas County Health District, a **\$1.2 million** grant from the BP Husky Settlement was utilized in conjunction with Lead Hazard Control and Healthy Homes grant; **\$132,444** has been expended.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Garfield /Starr/ Raymer	1	1	Targeted Investment Area
Junction/Englewood	6	15	Targeted Investment Area (proposed NRSA)
Old South End	1	3	Targeted Area (proposed NRSA)

Table 4 – Identify the geographic distribution and location of investments

The table above represents **Preliminary Data** of the percentage of allocation of resources in targeted areas for the 2021 (47th) PY. The final data will be included in the final version of this CAPER.

Narrative

National economic conditions continue to affect the revitalization and stabilization of Toledo neighborhoods. Investments were prioritized to benefit low- and moderate-income individuals including minorities, seniors, and persons with disabilities. Issues such as an older housing stock, an increase in vacant and deteriorated properties that contribute to blight and a lack of economic development opportunities are negatively impacting once thriving neighborhoods.

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

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

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

There was an abundance of time and energy put into designating Neighborhood Revitalization Strategic Areas (NRSA's) during the 2020 program year. Several meetings have taken place with representatives from three neighborhoods - Junction/Englewood, Old South End and the East Side. During the 2021 program year, the Department of Housing and Community Development continued to push forward with the finalizing of the NRSA's. Per CPD Notice 16-16, the Department consulted with the HUD field office through letters, emails and meetings. As a result of the consultations and HUD NRSA eligibility criteria, the Old South End and Englewood areas were selected as the proposed NRSA's. The NRSA draft plan will be available for public view and comment prior to submission to HUD for final approval.

The COT, in adherence to HUD regulations, allocates at least 70% of its 2021-2022 CDBG entitlement award to programs that directly benefit low- and moderate-income individuals and families. Of the total individuals and families served with CDBG, 99% qualified as low- and moderate-income.

Leveraging

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

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

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

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

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

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

Table 5 – Fiscal Year Summary - HOME Match Report

The tables below represent **Preliminary Data** in the 2021 (47th) PY. The final data will be included in the final version of this CAPER.

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

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
4,258	99,201	0	0	103,459

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	260,606	0	0	87,665	0	172,941
Number	7	0	0	2	0	5
Sub-Contracts						
Number	17	0	0	6	0	11
Dollar Amount	73,649	0	0	13,925	0	59,724
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	260,606	0	260,606			
Number	7	0	7			
Sub-Contracts						
Number	17	0	17			
Dollar Amount	73,649	0	73,649			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired		0	0			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

The tables below represent *Preliminary Data* in the 2021 (47th) PY. The final data will be included in the final version of this CAPER.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	250	299
Number of Non-Homeless households to be provided affordable housing units	252	274
Number of Special-Needs households to be provided affordable housing units	129	128
Total	631	701

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	250	299
Number of households supported through The Production of New Units	18	7
Number of households supported through Rehab of Existing Units	321	325
Number of households supported through Acquisition of Existing Units	42	70
Total	631	701

Table 12 – Number of Households Supported

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

In the table above, the one-year goal was estimated in the Annual Action Plan. The actual numbers for 2021 (47th) PY are reported with details below on the goals.

With the availability of Emergency Rental Assistance (ERA) funding from the U. S. Department of Treasury, the majority of potential landlord participants opted to use ERA funding as opposed to the Tenant Based Rental Assistance (TBRA).

The “Production of New Units” goal was not met due to a delay in construction due a lack of contractors and increased costs of materials. DHCD anticipates the completion of New Unit projects in PY 2022.

Discuss how these outcomes will impact future annual action plans.

The DHCD has instituted weekly team meetings which focus on strategic areas including:

- Affordable Housing Development
- Owner-Occupied Rehabilitation
- Down Payment Assistance Programs

The meetings consist of team members providing updates on their specific projects and advisement as to issues or problems which need to be addressed. Spreadsheets are updated and team members provide guidance and recommendations on ways to make DHCD programs better and more efficient. The Owner-occupied Rehab Program as administered by a sub-recipient has been highly successful as well. DHCD will continue to seek out strong, viable partnerships with local organizations that have the capacity to carry-out the annually planned activities.

Outreach to contractors will continue to be a priority as the rehab staff. The rehab team has held meetings to engage potential contractors to work within the DHCD HOME programs.

Additionally, the team reviews a plethora of reports in the Integrated Disbursement Information Systems (IDIS) in an effort to ensure projects are being closed in an efficient and timely manner.

Staff has taken advantage of various training opportunities which provide knowledge, guidance, and thought-provoking ideas for affordable housing prospects which can be integrated into the City of Toledo.

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

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	128	26
Low-income	132	48
Moderate-income	12	52
Total	272	126

Table 13 – Number of Households Served

Narrative Information

The DHCD continues to partner with a local non-profit agency to carry out housing support assistance. The partnering agency administers the rehabilitation of existing units and production of units. The primary goals for partnering with the non-for-profit is to increase housing support productivity and reduce costs. In addition to increased productivity and reduced costs, these partnerships also facilitate interaction, such as outreach and trust, between the communities being served and the agencies that provide support. The DHCD is committed to working with its partner(s) to improve and provide decent and safe housing to the communities it serves.

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

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

Neighborhood Properties Inc. (NPI) continues to provide outreach services to homeless and chronically homeless individuals and families with mental health issues through its PATH (Projects for Assistance in Transition from Homelessness) program. PATH works to build rapport with these vulnerable individuals and families, encouraging them to get help. The PATH team conducts outreach in the streets, under bridges, in wooded areas, or other areas where they are likely to find homeless persons and families, specifically those most apt to have a mental illness. Once contact is made, PATH outreach workers offer practical assistance which includes food, clothing, on-site assessments, crisis intervention, and peer support. Once a person or family accepts help, they may require intensive support throughout recovery, including learning basic living skills and building healthy relationships. PATH facilitates access to core services such as emergency shelter, transitional housing, mental healthcare, and substance use disorder treatment and case management. PATH is funded in part by the Ohio Department of Mental Health and the Ohio Development Services Agency via the Mental Health & Recovery Services Board of Lucas County.

The COT and Continuum of Care (CoC) continue to collaborate with the Veterans Administration (VA), Supportive Services for Veteran Families (SSVF) and One Matters in the efforts of ending Veteran Homelessness. VA and One Matters perform quarterly community outreach events, as well as having a continued presence in Toledo and Lucas County. Working in collaboration with the VA and TLCHB's Community Veterans Master List Committee, SSVF staff from Great Lakes Community Action Partnership (GLCAP) meet with homeless veterans located in the shelters and other locations, perform intakes and assessment, and offer assistance in connecting with VA and other mainstream resources. With those continued relationships, the Toledo area has been able to address various housing needs of veterans experiencing homelessness, culminating in the provision of permanent housing to those Veterans or Veterans with families who are experiencing homelessness.

Another area of community outreach growth is youth homelessness. To address youth homelessness in Toledo and Lucas County, a youth-centered emergency shelter was opened. Its mission is to provide a safe place for runaway, troubled and homeless youth. Zepf Center - Safety Net opened a 12- bed facility that serves unaccompanied youth between the ages of 12 to 18 years old and is located in a community mental health center with a separate door for the youth emergency shelter. In the past year, Safety Net has increased its' bed capacity to 16 beds. They average 6-7 unaccompanied youth per night staying anywhere from 1 day to 21 days. In addition to these outreach efforts, COT and the CoC have collaborated on a number of rapid resolution outreach efforts designed to mitigate harm to those experiencing homelessness or at risk.

TLCHB works to promote 2-1-1 services within the community to increase access to community resources and centralized access for homeless services. TLCHB and the UW Central Access staff have been meeting to re-evaluate this process to improve the experience of individuals calling in for assistance and evaluating the best means to assess their needs. A new assessment tool is currently being tested to discontinue the current VI-SPDAT and related assessments which create disparities and bias for those receiving service. In addition to this effort this group is assessing the referral process from 2-1-1 Coordinated Entry (CE) to shelter and to housing first services to reduce barriers and shorten the length of time individual and families are waiting for these services.

Addressing the emergency shelter and transitional housing needs of homeless persons

TLCHB assisted in coordinating onsite COVID testing in the homeless shelters by partnering with Neighborhood Health Association. It has also assisted individuals in need of a hotel stay prior to shelter placement (for isolation purposes). The CoC actively engages in quarterly meetings of the Re-Entry Housing Committee, which is comprised of many different provider partners focused on expanding capacity to serve this subpopulation.

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

- Local housing authority restrictive eligibility standards which exceed HUD's mandated restriction limits, especially those regarding criminal history, past public housing evictions, and current public housing debt restrictions.
- Limited turnover of permanent supportive housing units which limits the number of new units/beds available.
- Limited number of new permanent supportive housing units being created which limits placement only to those existing beds that turnover.
- Limited number of private landlords willing to accept local housing authority's housing vouchers or other subsidized vouchers (including CoC subsidies) which minimizes the pool of readily available units from which to choose to rent.
- Limited pool of flexible funds to use to incentivize landlords to accept vouchers and other local subsidies and minimize landlord losses to damage or non-payment.
- Community Advisory Council - In an effort to create a larger community discussion about homelessness and housing needs in our community, the CoC has held bi-monthly Community Advisory Council meetings in collaboration with Lucas Metropolitan Housing. These meetings served as a connecting point for data driven discussions, communication, continuing education, and community updates. The meetings averaged anywhere from 50-70 participants per meeting and resulted in valuable feedback to guide the decision making of the TLCHB.
- CoC Strategic Plan - In partnership with a key homeless service providers and local funders, TLCHB is embarking upon a larger Strategic Planning initiative for the broader Continuum of Care.

At the close of FY 2021, TLCHB had completed asset mapping which provide a perspective on the current services and resources as identified through partners and programs of the Toledo Lucas County Homelessness Board (TLCHB). The importance of this report lies in its ability to identify gaps in services, as well as attention to services that are identified as priorities by providers and recipients of services.

Information and data in this report may be used to build viable and sustainable programs and services for people experiencing homelessness throughout Lucas County, Ohio by programs and services for people experiencing homelessness throughout Lucas County, Ohio by providing a framework to:

- Build on and expand existing community strengths,
- Generate a shared awareness and understanding of community assets,
- Articulate and communicate spatial knowledge to external agencies and stakeholders throughout the service area
- Identify and potentially increase capacity and assets within Lucas County.

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

- Veterans By Name List Committee and SPDAT List/Children with Families Master List Committee by the local CoC - These committees continue to review current cases of existing veterans, families with children, or singles who are also experiencing homelessness to identify ongoing barriers and potential action steps to move them quickly into permanent housing.
- Chronic Homelessness Housing First/No Barriers Housing Core Leadership Team - No Barriers Housing is the taskforce created to quantify the past and current number of persons experiencing chronic homeless, to identify national and local best practices that have demonstrated reductions in chronic homelessness, and to redesign and fully implement Housing First Model that will lead to quicker housing placements and reduce returns to homelessness among the hardest to service (chronic homelessness). This taskforce has established a special voucher program for people experiencing chronic homelessness in coordination with Lucas Metropolitan Housing (LMH), Mental Health and Recovery Services Board (MHR SB), Unison Health, St. Paul's Community Center, and other providers. This program has successfully housed over 50 individuals experiencing chronic homelessness with a housing choice voucher across various programs. Additionally, the CoC is implementing the HUD Housing First Standards Assessment tool throughout the system to measure system-wide fidelity to housing first standards.
- Quality and Performance Committee - a monthly meeting utilized to analyze current data to update current key performance standards, to measure progress, to identify system bottlenecks, to identify local best practices for improvement and to propose system improvements.
- Housing Problem Solving Pilot Program - TLCHB and Gryphon Place 2-1-1 have collaborated to secure funding for the Housing Problem Solving Pilot Program (HPS), which will seek to expand capacity for prevention, diversion, and rapid resolution activities throughout the Continuum. HPS techniques can be applied to homelessness prevention strategies, coordinated intake and assessment, and outreach and shelter services to assist households in avoiding homelessness or to exit homelessness as quickly as possible at any point in the homeless response system. HPS is a person-centered, housing focused approach to explore creative, flexible, safe, and cost-effective solutions to quickly resolve the housing crisis - even if just temporarily - with limited or no financial support. Households may return to a prior residence, relocate to confirmed safe housing, stay with friends or family, or secure a new tenancy.
- TBRA Work Group - an ad hoc meeting utilized to provide ongoing support and collaboration for TBRA utilizing projects and to review policy and procedural changes.
- Service Prioritization Decision Assistance Tool (SPDAT) - An evidence-based assessment tool utilized by the community as the Coordinated Entry Assessment tool for housing. There has been increased integration of mainstream non-homeless service providers into the continuum. Mainstream mental health providers were trained in SPDAT implementation, conduct SPDAT assessments, and report SPDAT assessment results to the CoC for assistance in permanent housing placements. Lucas County Ohio Means Jobs, the employment service one-stop source, provided training regarding their employment services and created a separate tracking system for referrals from homeless service providers. TLCHB performed housing placement assessments and made referrals for housing placement in a faith-based women's shelter that previously had little participation in the local CoC. TLCHB continue to work with and support the Toledo streets Newspaper. They have become an integral site to coordinate the annual Point-In-Time Count.

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 following percentage of persons directly exited into permanent housing:

- **55%** Emergency Shelter
- **75%** Transitional Housing
- **67%** Permanent Supportive Housing
- **80%** Rapid Re-Housing

The following percentage of persons exited for positive or neutral reasons:

- **57%** Emergency Shelter
- **100%** Transitional Housing
- **72%** Permanent Supportive Housing
- **73%** Rapid Re-Housing

The percentage of adults employed at exit:

- **62%** Emergency Shelter
- **0%** Transitional Housing
- **15%** Permanent Supportive Housing
- **<1%** Rapid Re-Housing

The following percentage of persons exited with non-cash benefits

- **46%** Emergency Shelter
- **77%** Transitional Housing
- **51%** Permanent Supportive Housing
- **51%** Rapid Re-Housing

The following length of stay measured in days for those exiting:

- **70** Emergency Shelter
- **90** Transitional Housing
- **1,569** Permanent Supportive Housing
- **488** Rapid Re-Housing

In addition to the Housing Problem Solving programming, TLCHB has worked locally with the CoC works with a group of providers monthly to discuss local policies or the need for new or modified policies. The Tenant Protection Working Group comprises members of the TLCHB, City Council, Fair Housing, Advocates for Basic Legal Equality, Legal Advocates of Western Ohio, Senator Brown's staff, LISC, The Ability Center, Lucas Metropolitan Housing, and United Way. This group is discussing emerging trends and impacts. These range for landlord predatory practices in aggressive application fees and leasing, zoning and rights issues related to corporate landlord transforming large areas into rental only zones. The group has identified there may be a

need to evaluate current policies or lack thereof for the growing number of group homes in the area. Providers in the group have developed education around source of income discrimination for landlords (Fair Housing Center).

TLCHB is coordinating with LCH for additional vouchers to assist in the better stability plans for individuals and families exiting form the system as these have proven to be the most effective means of reducing recidivism.

TLCHB has actively been involved in a HUD cohort to address racial Equity and Access within the local system and has recently launched a local committee that is looking to evaluate the system for possible changes and improvements.

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

Actions taken to address the needs of public housing

During the 2021 Program Year Lucas Metropolitan Housing (LMH) accomplished the following:

- Opened the waiting list on 07.26.21. Over 3,000 applications were received.
- 98% occupancy was achieved in late 2021 and has been sustained throughout the program year.
- After School All Stars, provided tutoring assistance for up to 90 youth at 4 LMH developments.
- Partnering with Connecting Kids to Meals and other Agencies provided 11,466 meals.
- Distributed over 1,000 devices, over 1,000 residents connected to WIFI and over 100 digital literacy classes were provided.
- The “Reach Out and Touch” initiative was continued during the program year and had 9,297 contacts.

Affordability: Housing Stability Initiative launched in early 2021 to ensure all residents with rental arrearages were connected to rental assistance. Over 300 applications were submitted.

Supply: LMH and the CoC utilized 123 Emergency Vouchers for the homeless. All vouchers have been issued.

- LMH is developing 321 Apartments and Townhomes for seniors, families, and special populations. The investment is over \$90 Million. Developments are CWG Phase IV; CWG Phase V; The Park Apartments; Palmer Gardens; and Thurgood Marshall Apartments.
- HUD’s Rental Assistance Demonstration Program is a tool to preserve affordable housing. 20 public housing scattered sites will be transferred to apartments at CWG Phase IV.
- Portfolio repositioning continues. Unveiling is scheduled for late 2022.
- The Choice Neighborhoods Initiative planning continued for McClinton Nunn Homes and Junction Neighborhood. The Housing Plan will add 291 new housing apartments, townhouses, flats, and lofts. The draft plan was submitted to Hud on June 2022 and has been accepted by HUD. The final plan is due in December 2022. (See draft plan at www.junctionchoice.com)
 - Early Action Activities are in planning phase.

Quality: Capital Fund projects continued to improve apartments, with upgrades to mechanical systems, electrical panels, boiler replacements, fire pump replacements, security cameras, sewer systems, parking areas, windows, and roof repairs and/or replacements.

Accessibility: 504 plans continue to be reviewed and prioritized for development based upon availability of Capital Funds.

Size of Units: LMH completed its review of occupancy and its portfolio and plans are underway for adjustments to appropriate apartment size.

- LMH may consider in future openings of the waiting list to target specific apartment sizes to meet demand.

Location Strategies: HCV Department is planning a landlord Symposium to recruit more landlords.

- HCV was awarded \$75K from Lucas County to fund a landlord incentive/mitigation program to attract new and retain current landlords.

At-Risk Populations: 30 new vouchers were awarded to TLCHB.

- The Park Apartments will add 45 new apartments to serve Transitioned Aged Youth population.
- CWG Phase V and the Thurgood Marshall developments will add 161 new apartments for seniors.

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

- A Financial Opportunity Center (FOC) is being developed with the Family Self-Sufficiency (FSS) program providing additional resources, and the new ESUSU program that reports on-time rents helping residents build credit. Over 40 residents are enrolled in ESUSU.
- Implemented “Thumbs Up 2.0” providing opportunity for staff, community members, residents, and volunteers to engage in beautification efforts, fellowship and build pride across 19 LMH properties.
- Central Resident Advisory Board (CRAB) is working to establish several new Resident Councils.
- HCV department will remove the maximum number of participants allowed to enroll in the Homeownership program.
- LHSC hired a certified HUD housing counselor. The counselor provides homeownership counseling classes receiving referrals from the community.
- LHSC implemented a mini parade of homes during the month of July 2021 and has converted 15 vacant and occupied houses to homeowners.
- Over 100 individuals participated in two homeownership sessions. Several individuals who attended, signed Purchase Agreements to buy LHSC homes.

Actions taken to provide assistance to troubled PHAs

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

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

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

The City does not impose any public policies that would present barriers to affordable housing, such as rent controls or impact fees. The City instead strives to ensure inclusionary zoning through policies such as allowing multifamily housing in select residential districts (as well as in commercial and mixed-use districts) and the use of flexible zoning standards for existing undersized lots to facilitate infill. While most land in the City is already developed, zoning policies are considerate of the continued need for inclusionary practices to provide opportunities for the development of affordable housing development.

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

Suitable infrastructure is widely available in the city, but continued code enforcement efforts are needed to maintain the current affordable housing stock in usable condition and stabilize existing neighborhoods. While these efforts are needed throughout the City, Toledo limits the use of CDBG funding for code enforcement activities only to eligible low- and moderate-income areas that are deteriorated or deteriorating.

Jurisdictions that receive federal dollars, directly or indirectly, are required by the Department of Housing and Urban Development to complete an Analysis of Impediments to Fair Housing Choice (AI) as part of the jurisdictions' certification of affirmatively furthering fair housing. The AI process is prescribed and monitored by the federal Department of Housing and Urban Development and the State of Ohio's Department of Development. Specifically, to receive HUD Community Planning and Development formula grants, a jurisdiction must (i) certify its commitment to actively further fair housing choice; (ii) maintain fair housing records; and (iii) conduct an Analysis of Impediments to Fair Housing Choice. Partnering with The Fair Housing Center (TFHC), a 2020-2024 Analysis of Impediments (AI) to Fair Housing Choice was completed. The AI includes action steps for the removal of fair housing obstacles in its Fair Housing Action Plan (FHAP). The COT and TFHC collaborates with community partners on the implementation of the Five-Year Fair Housing Action Plan.

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

The needs of the underserved for housing, community development and basic needs services are tremendous. The amount of funding available to effectively implement and run these programs are limited and create an obstacle for many of the agencies that assist low- to moderate-income individuals, families and/or neighborhoods.

The goals identified in the Strategic and Action Plans are directed towards addressing underserved needs. The highest priority identified in the Strategic Plan is Affordable Housing. However, other priorities related to basic needs were also identified. The COT, whether through programs that it administers or programs delivered in collaboration with community partners, is very committed to meeting the needs of the underserved population.

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

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

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

The Fair Housing Center Key Highlights include:

- KeyBank, NeighborWorks Toledo Region, and TFHC announced a partnership to help improve access to homeownership in historically underserved neighborhoods.
- A settlement was reached in a lawsuit filed by TFHC, The Ability Center, and a resident against the builders and developers of Brooklynn Park senior housing community, alleging discrimination against persons with disabilities for failing to comply with federal regulations for housing accessibility. The agreement requires defendants to pay \$400,000 in damages and provide remediations to properties at no cost to residents.
- The COT passed an ordinance adding source of income as a protected class, prohibiting housing providers from denying housing to individuals who are using vouchers or other non-traditional income to pay for housing.
- Community partners and the Plan Commission collaborated to draft proposed amendments to the City's zoning code regulating group living, in an effort to reduce unfair restrictions on housing for persons with disabilities.
- Several supportive, affordable housing projects that had previously faced opposition, including Warren Commons and a residential treatment facility operated by Unison, were approved by City Council.
- Based on a Supreme Court decision, HUD officially expanded fair housing protections to include those experiencing discrimination based on their sexual orientation or gender identity.
- Community partners including TFHC, TLCHB, LMH, Lucas County, COT, LAWOW, United Way of Greater Toledo, and several others announced a new collaboration TFHC CAPER Information 2021-2022 CAPER July 1, 2021 - June 30, 2022 aimed at preventing evictions and improving housing stability. Providers will work together to support residents with a variety of housing resources to ensure all of their needs are met and keep them stably housed.
- The COT prepared for implementation of its lead safe housing ordinance through education and outreach, workforce development, establishment of rental registry and lead safe certification processes, development of a website for resources, and procurement of grant funding to help offset the cost of compliance for owners.
- Lucas County voters approved a ballot measure to switch TARTA's funding source from property tax to sales tax and increase Lucas County sales tax, thereby generating additional revenue to support the expansion of public transportation throughout the entire region.
- The COT passed ordinances to help protect tenants facing eviction, including Pay to Stay which enables tenants to defend an eviction if they offer to pay any rent and fees owed to the housing provider, and Right to Counsel which provides legal representation for tenants facing an eviction if they meet income requirements.

- The COT received and distributed millions of dollars in emergency rental assistance to help tenants struggling to pay rent due to the impact of the pandemic.
- TFHC, along with the National Fair Housing Alliance (NFHA) and 19 other local fair housing organizations throughout the country, reached a landmark \$53 million agreement with Fannie Mae to resolve a case arising from allegations that Fannie Mae treated foreclosed homes in communities of color unfavorably. Approximately \$755,000 of the settlement will be directed towards community reinvestment in the Toledo area. TFHC will administer these funds and conducted outreach to seek input from the community (residents and organizations) as to how the settlement should best be utilized to restore and revitalize neighborhoods of color that were harmed by these discriminatory practices.
- Through collaborative efforts of local residents, community organizations, and the City as part of the Water Affordability and Consumer Protection Committee, several measures were put in place to improve water access and affordability for residents. Accomplishments include the establishment of a debt forgiveness program to help low-income residents avoid water shutoffs due to nonpayment, and the passage of several ordinances to protect tenants from water shutoffs or unfair water bills.

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

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

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

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

The DHCD receives funding to administer dedicated lead-based paint hazard control activities through a Lead-Based Paint Hazard Control Grant program. Funding sources include the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH), the Ohio Department of Health's (ODH) Medicaid SCHIP, the Toledo-Lucas Regional Health District BP-Husky settlement and Community Development Block Grant (CDBG) for supplemental funding on high-cost units.

During the PY 2021 reporting period the DHCD completed and closed out OLHCHH grant OHLHB0636-17. Final close-out documentation was submitted 4/30/2022. Through the course of the grant period the program was able to complete **193** Lead Inspection/Risk Assessments, provide lead hazard control and make **126** residential housing units (**25** owner occupied and **101** rental) lead safe; of which **67** units also had health and safety issues addressed through Healthy Homes. This equates to a total of 112 families assisted with 91 children under the age of six provided a lead safe environment. Additionally, 124 persons between the ages of 6-17 years of age and 154 persons 18 years and above were also positively impacted with a lead safe unit in which to reside; with an average household income of 40.3% AMI.

The DHCD continues to administer OLHCHH grant OHLHD0453-20 along with the remaining three dedicated lead-based paint hazard control funding sources.

Aggregate results from the dedicated lead-based paint hazard control activities during PY 2021 included, **168** eligible units enrolled, **14** units having received a comprehensive Lead Inspection/Risk assessment and **46** units achieving a lead clearance (**11** owner-occupied/**35** rental).

Additionally, the DHCD provides ancillary lead-based paint hazard control activities through its other housing programs as well. The DHCD administers owner-occupied rehabilitation, rental rehabilitation, Lead Based Paint Hazard Control grant program (**LBPHC**), Tenant-Based Rental Assistance (**TBRA**), and CHDO programs, which are required to incorporate lead inspections and/or assessments on any unit the DHCD evaluates. For rehabilitation projects, properties with lead hazards utilize component abatement, interim controls, standard practices, or lead-safe work practices. State licensed lead abatement contractors and personnel along with Certified Lead Renovation, Repair and Painting contractors are used in accordance with federal regulations. All units are required to pass a final lead clearance examination upon conclusion of all work. For PY 2021, the DHCD continued to conduct Housing Quality Standard (**HQS**) inspections for TBRA programs, ensuring compliance with 24 CFR 982.401, for **4** units that were performed by licensed Lead Risk Assessors.

In PY 2021, the DHCD was able to make **46** owner-occupied units lead safe through the HOME funded Owner-Occupied rehabilitation program.

In addition, homes awarded down-payment assistance through HOME funds were inspected for lead. Results of assessments and actions needing to meet city, state and federal regulations require that the dwelling meet minimum property standards and no deteriorated paint in excess of the following was found: 20 sq. ft. of exterior or 2 sq. ft. of interior surface, or 10 percent or more of any building component with a small surface painted area. In PY 2021, **69** Down Payment Assistance grants were provided, with **69** lead visual assessments completed.

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

The ordinance enacted a 5-year phase in schedule by census tract with a compliance phase scheduled every six months effecting approximately 45,000 total units; the first of ten phases by 06/30/2022, with full compliance by 12/31/2026. However, due to a law suit filed 6/27/2022 the COT agreed not to enforce the ordinance until 8/1/2022 in an attempt to resolve issues in the claim and avoid any protracted litigation.

There are approximately ten census tracts in each phase beginning with the highest at-risk areas. It is anticipated that approximately 5,200 rental units will comply by the end of phase 1. Currently there are 2,321 rental units in compliance. The ordinance activities will also generate a lead-safe unit registry to be developed and maintained by the Lucas County Regional Health District.

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

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

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

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

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

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

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

The Department of Housing and Community Development manages all aspects of the HUD grant programs and recognizes the need to maintain a high level of coordination on projects involving other City departments and/or organizations. This collaboration assures an efficient use of resources and optimal accomplishments. The COT will continue to coordinate efforts with partners, including:

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

Each of the City of Toledo's partners brings specialized service components and experience. A continued commitment to these partnerships and collaborations is critical in achieving the desired outcomes for the community. Many relationships exist consisting 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.

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

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

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

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

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

Partnering with the Fair Housing Center (TFHC), a 2020-2024 Analysis of Impediments (AI) to Fair Housing Choice was completed. The AI includes action steps for the removal of fair housing obstacles in its Fair Housing Plan.

The AI identified the fair housing barriers that will be addressed from 2020-2024. 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 reentering 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 choice and highlights the need for legislative changes to ensure the effectiveness of this programming.

The AI is used as a catalyst for the City to develop and implement a Fair Housing Action Plan. The Fair Housing Action Plan will identify strategies that will be implemented in order to curtail and/or eliminate the impediments identified in the Analysis. The Analysis drives the Fair Housing Action Plan, which is the guiding document outlining the concrete steps that the City and its partners will take to address the impediments.

The COT and TFHC collaborates with community partners on the implementation of the Five-Year Fair Housing Action Plan (FHAP).

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

CR-40 - Monitoring 91.220 and 91.230

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

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

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

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

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

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

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

Twice a year, TPPs electronically submit the following:

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

Desk audits are also conducted as needed.

In addition, all TPPs are required to attend quarterly mandatory trainings. The quarterly trainings provide the TPPs with information on policies and procedures, HUD regulations, as well as training in the assistance of utilizing the online system for reporting and request for funds reimbursements. Since the onset of COVID, these meetings have been cancelled. However, an orientation was provided for all new TPPs and for any other TPP who wanted to attend via zoom, to review CDBG/ESG policies and procedures and compliance of HUD regulations. Moving forward, the quarterly trainings will resume via zoom starting in September 2022.

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

The Compliance Manager with the support of the Neighborhood Development Specialists (NDSs) monitor housing development projects that are funded by HOME on an annual basis. Both Rental Development and Owner-Occupied Rehabilitation projects are monitored annually during the affordability period.

Owners of rental housing must provide annually to the City of Toledo, information on rents and occupancy of HOME assisted units to demonstrate compliance with 92.252 (i.e., rent limitations, tenant income, subsequent rents during the period of affordability, fixed and floating units and over-income tenants). Additionally, ongoing periodic inspections of HOME-assisted rental housing must be performed to determine compliance with property standards of 92.251 and on-site inspections under 92.251. An onsite inspection must occur at least once every three (3) years throughout the period of affordability.

The goal of the Owner-Occupied Rehabilitation program is to ensure that any homeowner unit assisted meets code standards and promotes longevity of the repairs. The Housing Division monitors the housing unit for continued residency and compliance to the terms of the agreement for a minimum 10-year period. If prior to the first anniversary of the mortgage note, the housing unit is sold or transferred or the Owner Occupant ceases to use the residence as their primary residence, then the principal balance of the note shall be due and payable in full. For each year of continued ownership use as a primary residence by the beneficiary, the mortgage is forgiven in an amount not to exceed 1/10th of the assistance amount. On or before May 1st of each calendar year, the Owner-Occupant is required to provide an annual certification and/or documentation to the Housing Division that they continue to own and reside in the assisted home as their primary residence.

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

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

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

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

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

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

For the 2021-2022 DRAFT CAPER, notices were placed in three periodicals, The Blade, The Toledo Journal and La Prensa. The latter two publications target African-American and Hispanic/Latino audiences, respectively.

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

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

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

Friday	07/29/2022	Public Notice sent to The Blade, The Toledo Journal and La Prensa
Sunday	08/07/2022	Public Notice published in The Blade
Wednesday	08/10/2022	Public Notice published in The Toledo Journal and La Prensa
Friday	08/12/2022	Public Notice posted to the City of Toledo website.
Monday	08/15/2022	Press Release sent to Mayor’s office for distribution to the news and social medias. An email was sent to TPPs and other local organizations.
Tuesday	08/30/2022	DRAFT CAPER emailed to designated locations to post to websites.
Wednesday	08/31/2022	15-day comment period begins
Thursday	09/01/2022	Virtual Public Hearing on DRAFT 2021 CAPER at 5:30 p.m. via Zoom
Wednesday	09/14/2022	Public Comment period ends

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

CR-45 - CDBG 91.520(c)

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

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

The city received from the CARES ACT **\$5,979,865** in Community Development Block Grant (CDBG-CV) funding and **\$4,875,338** in emergency Solutions Grant (ESG-CV) funding. As a result, the city of Toledo submitted three (3) substantial amendments to include the CDBG-CV and ESG-CV funded activities/programs that were implemented as a result of the CARES Act.

Through the use of the CDBG-CV funding, the activities implemented included: Business Assistance; Emergency Rental Assistance; Testing; Supplies/Cleaning; Food Security; Youth, Senior, Special Populations Assistance; Legal Support, etc. With the ESG-CV funding, the activities implemented included: Emergency Rental Assistance, CoC Collaborative, Equipment, Supplies, Case Management and Street Outreach. All activities were designed to prevent, prepare for, or to respond to the Coronavirus.

During PY 2021, the city expended **\$4,212,823** of CDBG-CV and **\$4,056,845** of ESG-CV funding. However, many partners that have activities relating to COVID are experiencing difficulty in completing their activities timely. The city of Toledo staff is monitoring the COVID activities to ensure that all funds will be expended as according to the HUD required expenditure deadlines.

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

No

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

CR-50 - HOME 91.520(d)

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

The following housing developments received on-site inspections by the Division of Housing during the 2021 program year:

Mercy Outreach Ministries IV: units - 1149 Shadow 1-1C, 1149 Shadow 1-1D, 6325 Nebraska 2-2C, 6325 Nebraska 2-2D; **Garden View Acres:** units - 1113 Rockcrest, 1031 Steeplebush; **Friendship New Vision:** unit - 1506 Marthal; **Commons at Garden Lake - 1065 Garden Lake:** units - #104, #115, #203, & #313; **Adams Street II (Uptown Arts II):** units - 332 14th St. #305, 332 14th St. #207, 328 14th St. #202, 328 14th St. #103; **Ottawa River Estates:** units - 2030 Abygail Trail #A, 2042 Abygail #B, 4638 Davids Creek #B, 4656 Davids Creek #B; **Bridgepoint Senior Village - 2005 Abygail Trail:** units - #6, #9, & #10; **New Cheney Flats:** units - 10 Southard, #104, 14 Southard #101, 18 Southard #306, 6 Southard #206; **Ottawa River Estates - scattered sites:** units - 2938 Lincolnshire #C, 3128 Lincolnshire #C, 3355 Queenswood #A; **Valley Bridge Senior Housing - 5351 Nebraska Ave.:** units - #107, #118, & #323; **Chestnut Hill - 1127 Champlain St.:** units - #203, #211, & #101; **SouthEast Toledo Homes II (SETH II):** units - 210 Sumner, 604 South, 637 South, 968 Kingston; **Aurora Project (Carriage House):** units - 1023 & 1025 N. Superior; **Collingwood Green Phase II:** units - 355 Belmont, 802 Rogan, 396 Addie Way; **Collingwood Green Phase I - 800 Division Units:** #206, #311, #300, & #303; **SouthEast Toledo Homes I (SETH I):** units - 525 Viking, 1128 Ironwood, 317 Dearborn, 541 South; **Cherry Legacy 1:** units - 102 West Delaware, 335 W. Delaware; **United North School Homes I:** units - 918 Baker, 917 Moore, 723 Peck; **United North School Homes II:** units - 901 Bronson, 927 Moore, 926 Peck, 2102 Locust; **West Central Homes 1:** units - 635 Palmwood, 2318 Auburn; **New Town Apartments:** units - #669, #715, #727, #847, #1021, #1141 Dorr Street; **1116 Brookview - 1030 Brookview:** units - #4, #5, & #6; **Autumn Woods Village:** units - 636 Acton, 637 Acton, 4163 Piedmont; **Madonna Homes - 722 N. Huron:** units - #121, #229, & #519; **Palmer Gardens:** units - 2708 Wayman Palmer 01-006, 2734 Wayman Palmer 04-017, 2734 Wayman Palmer 04-019, 2734 Wayman Palmer 04-022, 2752 Wayman Palmer 05-024, 2752 Wayman Palmer 05-025; **Pilgrim Port - 4545 Angola Rd.:** units - #16, #24, #33, & #37; **Renaissance Senior Apts. - 419 N. St. Clair St.:** units - #209, #210, #301, #413, & #420; **TCDC: Englewood Senior Housing - 2737 Monroe St.:** units - #307, #203, #210, & #301; **Woodside Village Apts. - 1045 Brookview:** units - #1, #10, #8, & #9; **Brookview Gardens:** units - 1051 Brookview, 1119 Hilltop, 5736 Staghorn; **City Forest of Toledo:** units - 731 Indiana, 640 Vance, 530 Lucas; **ROOST 1:** units - 1623 Copley, 5337 Darlene, 5520 Nebraska, 4325 Holly Hill, 2180 Aberdeen; **ROOST 2:** units - 5107 Adella, 2653 Nash; **REACH:** units - 1645 Eleanor, 201 E. Northgate, 2649 Northwood Ave., 5615 Parkstone; **St. Hedwig - 244 Bronson:** units - A-106, A-206 and A-300; **Parqwood Apts. - 2125 Parkwood:** units - #237, #301, #308, #312, #315, #325, & #346; **Legacy Hills - 4454 Hill Ave.:** units - #C103, #CG05, #C201, #C204, & #CG04; **Oakwood Homes IV:** units - 550 Fernwood, 1625 Norwood, 1256 Palmwood, 1307 Palmwood, 1311 Palmwood; **Oakwood Homes III:** units - 1423 Foster, 1817 Lawrence; **YWCA:** units - 1C & 2B; **Covenant House:** units - #202, #620, #306, & #204. All units passed inspection.

The following units still need to be inspected:

Collingwood Green Phase III: units - 732 Rogan Way, 731 Clemente Way, 363 Addie Way, 360 Bresnahans Green, 722 Division St, 352 Addie Way; **Ontario Place Homes:** unit - 3061 Ontario; **Pontiac Place Homes:** unit - 1449 North Huron, 3148 N. Ontario. All units to be inspected in December 2022.

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

Inspections Chart

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

Inspections Chart- HOME

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

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

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

A partner, most likely a developer, sponsor or owner of a project, describes what efforts they will make to attract those protected classes who might normally seek housing in their project. This is required as part of the DON's formal underwriting process. This is in effect for both homebuyer and rental projects.

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

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

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

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

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

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

The amount of Program Income authorized for PY 2021 (30th Year) was **\$113,422.80**. The amount committed to activities was **\$25,296.00**. The commitments are as follows:

- **\$25,296.00** for Owner-Occupied Rehabilitation
 - 1 - person household
 - White
 - Non-Latino
 - Elderly
 - Income 60-80% AMI

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

During PY 2021 the DHCD released a Notice of Funding Availability (NOFA) for the purpose of soliciting proposals to request gap financing for the development of affordable rental, permanent supportive housing, and non-congregate units. The NOFA resulted in 16 proposals being submitted with 11 receiving a Recommendation of Conditional Commitment from the DHCD. The funding for these gap financing requests will be sourced from HOME, ARPA, and HOME-ARP as deemed appropriate for the project.

At completion of construction of the projects, the City's affordable housing stock will increase by approximately 600 units. In PY 2022, DHCD will provide a conditional commitment for the preservation of 190 affordable units using Emergency Rental Assistance funds (ERA2) as authorized by the United States Department of Treasury.

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

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

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

ESG Contact Name

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

ESG Contact Address

Street Address 1	One Government Center
Street Address 2	Suite 1800
City	Toledo
State	OH
ZIP Code	43604
Phone Number	4192451401
Extension	
Fax Number	4192451192
Email Address	bonita.bonds@toledo.oh.gov

ESG Secondary Contact

Prefix	Mrs
First Name	Monica
Last Name	Brown
Suffix	
Title	Administrative Analyst IV
Phone Number	4192451617
Extension	
Email Address	monica.brown@toledo.oh.gov

2. Reporting Period—All Recipients Complete

Program Year Start Date	07/01/2021
Program Year End Date	06/30/2022

2021-2022 DRAFT CAPER

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

Subrecipient or Contractor Name: Catholic Charities Toledo
City: Toledo
State: OH
Zip Code: 43604, 5360
DUNS Number: 137824491
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 30,000

Subrecipient or Contractor Name: Toledo Community Service Center
City: Toledo
State: OH
Zip Code: 43604, 8005
DUNS Number: 151420122
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 127,500

Subrecipient or Contractor Name: ST. PAUL'S COMMUNITY CENTER
City: Toledo
State: OH
Zip Code: 43604, 5443
DUNS Number: 155295272
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 70,000

Subrecipient or Contractor Name: Toledo Lucas County Homelessness Board
City: Toledo
State: OH
Zip Code: 43604, 7258
DUNS Number: 941590114
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 248,694

Subrecipient or Contractor Name: UNITED WAY OF GREATER TOLEDO

City: Toledo

State: OH

Zip Code: 43604, 1410

DUNS Number: 020261681

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 115,000

CR-65 - Persons Assisted

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

4. Persons Served

4a. Complete for Homelessness Prevention Activities

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

Table 14 - Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

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

Table 15 - Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

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

Table 16 - Shelter Information

4d. Street Outreach

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

Table 17 - Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

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

Table 18 - Household Information for Persons Served with ESG

5. Gender - Complete for All Activities

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

Table 19 - Gender Information

6. Age - Complete for All Activities

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

Table 20 - Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households

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

Table 21 - Special Population Served

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

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

10. Shelter Utilization

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

Table 22 – Shelter Capacity

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

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

CR-75 – Expenditures

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

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

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

Table 23 - ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

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

Table 24 - ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

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

Table 25 - ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

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

Table 26 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2019	2020	2021

Table 27 - Total ESG Funds Expended

11f. Match Source

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

Table 28 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2019	2020	2021

Table 29 - Total Amount of Funds Expended on ESG Activities



Attachments



Citizen Participation

PUBLIC NOTICE
CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
for
2021 Program Year – July 1, 2021 to June 30, 2022

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2021-2022 CAPER
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Brown, Monica

From: Thorpe, Susan
Sent: Friday, August 12, 2022 9:31 AM
To: abdul.hamadeh@unitedwaytoledo.org; annebauman@compassionhealthtoledo.org; anneruch@gmail.com; antduran8213@gmail.com; aparlet@ecdi.org; awelch@ecdi.org; believecenter@gmail.com; carol.gray@toledogrows.org; cbishop@tlchb.org; chuckp@auroraprojectinc.org; cjamato@gmail.com; cmiller@pathwaytoledo.org; cwattley@nhainc.org; dalexander@familyhousetoledo.org; dargatza@co.lucas.oh.us; DeniseF@auroraprojectinc.org; dgray@nwtoledo.org; dhawkins@toledofhc.org; dpeluso@familyhousetoledo.org; EAST TOLEDO FAMILY CENTER; eellis@toledodesigncollective.org; elaina@believecenter.org; emcpartland@mvhabitat.org; eod.sqacc@gmail.com; frankt@co.lucas.oh.us; gcommu8708@bex.net; grantsadministrator@tlchb.org; grantwriter@spcc-toledo.org; gthomas@toledofhc.org; hzeller@lucasmha.org; ikinney@ecdi.org; jacksonv@co.lucas.oh.us; janeltate@gmail.com; jb_sqacc@yahoo.com; jblack@pathwaytoledo.org; jcintronvega@lucasmha.org; jefffortney@toledofhc.org; jhabib@spcc-toledo.org; jjacobs@lfhtoledo.org; jjarrett@theartscommission.org; jmpinskey@gmail.com; jodig@etfc.org; jswiech@gallonlaw.com; kachinger@mvhabitat.org; kbond@lucasmha.org; kclark@pathwaytoledo.org; kshankleton@lfhtoledo.org; lbanks@lfhtoledo.org; LEGAL AID OF WESTERN OHIO, INC.; lindaskowronek@toledofhc.org; lpengov@spcc-toledo.org; lweller@lawolaw.org; mariemflannery@toledofhc.org; matt.morris@unitedwaytoledo.org; mculling@theartscommission.org; mebadik1956@gmail.com; mfolk@theartscommission.org; mhart@tlchb.org; mhoffman@nhainc.org; michaelj@auroraprojectinc.org; mike.andersonhsi@gmail.com; mindy@seagatefoodbank.org; mjacomet@nwtoledo.org; mjarret@aol.com; mlk.kitchen@att.net; mmcintyre@mvhabitat.org; msachs@nwtoledo.org; mwolff_etsac@yahoo.com; nancy.elzinga@gmail.com; NEIGHBORHOOD HEALTH ASSOCIATION, IN; ntaylor@nwtoledo.org; pageelaine1@aol.com; paul@toledodesigncollective.org; rgagnon@lucasmha.org; rjordan@pathwaytoledo.org; rstone@ablelaw.org; ryan.bunch@unitedwaytoledo.org; scrabtree@ablelaw.org; sfriedman@toledofhc.org; stokest@co.lucas.oh.us; TOLEDO SEAGATE; tpace@familyhousetoledo.org; trish@seagatefoodbank.org; vhill@lucasmha.org; vmartinez@lawolaw.org; Welch, David; wendy.pesttrue@unitedwaytoledo.org; NEIGHBORWORKS TOLEDO REGION; yvonne.dubielak@toledogrows.org; Zgodzinski, Eric
Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene
Subject: 2021-2022 CAPER Public Notice
Attachments: 2021-2022 CAPER Public Notice.doc
Importance: High

Good morning,

The City of Toledo, Department of Housing and Community Development has scheduled a public hearing on the Draft 2021-2022 Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER includes the undertakings, activities, and accomplishments completed during the 2021-2022 Program Year and provides an assessment of the federally funded programs administered by the Department of Housing and Community Development.

You are invited to attend the public hearing on the Draft 2021-2022 CAPER.

The public hearing is scheduled as follows:

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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*

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Brown, Monica

From: Thorpe, Susan
Sent: Wednesday, August 17, 2022 12:38 PM
To: abdul.hamadeh@unitedwaytoledo.org; annebauman@compassionhealthtoledo.org; anneruch@gmail.com; antduran8213@gmail.com; aparlet@ecdi.org; awelch@ecdi.org; believecenter@gmail.com; carol.gray@toledogrows.org; cbishop@tlchb.org; chuckp@auroraprojectinc.org; cjamato@gmail.com; cmiller@pathwaytoledo.org; cwattley@nhainc.org; dalexander@familyhousetoledo.org; dargatza@co.lucas.oh.us; DeniseF@auroraprojectinc.org; dgray@nwtoledo.org; dhawkins@toledofhc.org; dpeluso@familyhousetoledo.org; EAST TOLEDO FAMILY CENTER; eellis@toledodesigncollective.org; elaina@believecenter.org; emcpartland@mvhabitat.org; eod.sqacc@gmail.com; frankt@co.lucas.oh.us; gcommu8708@bex.net; grantsadministrator@tlchb.org; grantwriter@spcc-toledo.org; gthomas@toledofhc.org; hzeller@lucasmha.org; ikinney@ecdi.org; jacksonv@co.lucas.oh.us; janeltate@gmail.com; jb_sqacc@yahoo.com; jblack@pathwaytoledo.org; jcintronvega@lucasmha.org; jefffortney@toledofhc.org; jhabib@spcc-toledo.org; jjacobs@lfhtoledo.org; jjarrett@theartscommission.org; jmpinsky@gmail.com; jodig@etfc.org; jswiech@gallonlaw.com; kachinger@mvhabitat.org; kbond@lucasmha.org; kclark@pathwaytoledo.org; kshankleton@lfhtoledo.org; lbanks@lfhtoledo.org; LEGAL AID OF WESTERN OHIO, INC.; lindaskowronek@toledofhc.org; lpengov@spcc-toledo.org; lweller@lawolaw.org; mariemflannery@toledofhc.org; matt.morris@unitedwaytoledo.org; mculling@theartscommission.org; mebadik1956@gmail.com; mfolk@theartscommission.org; mhart@tlchb.org; mhoffman@nhainc.org; michaelj@auroraprojectinc.org; mike.andersonhsi@gmail.com; mindy@seagatefoodbank.org; mjacomet@nwtoledo.org; mjarret@aol.com; mlk.kitchen@att.net; mmcintyre@mvhabitat.org; msachs@nwtoledo.org; mwolff_etsac@yahoo.com; nancy.elzinga@gmail.com; NEIGHBORHOOD HEALTH ASSOCIATION, IN; ntaylor@nwtoledo.org; pageelaine1@aol.com; paul@toledodesigncollective.org; rgagnon@lucasmha.org; rjordan@pathwaytoledo.org; rstone@ablelaw.org; ryan.bunch@unitedwaytoledo.org; scrabtree@ablelaw.org; sfriedman@toledofhc.org; stokest@co.lucas.oh.us; TOLEDO SEAGATE; tpace@familyhousetoledo.org; trish@seagatefoodbank.org; vhill@lucasmha.org; vmartinez@lawolaw.org; Welch,David; wendy.pesttrue@unitedwaytoledo.org; NEIGHBORWORKS TOLEDO REGION; yvonne.dubielak@toledogrows.org; Zgodzinski, Eric

Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene
Subject: FW: Media Release City of Toledo Department of Housing and Community Development Announces Public Hearing and Comment Period to the Consolidated Annual Performance and Evaluation Report

Attachments: Updated Media Release City of Toledo Department of Housing and Community Development Announces Public Hearing and Comment Period to the Consolidated Annual Performance and Evaluation Report.pdf

Good afternoon,

Please see the media release below.

Susan Thorpe
Clerk Specialist II

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

Visit us at: www.toledo.oh.gov

From: Voigt, Amy

Sent: Wednesday, August 17, 2022 12:29 PM

Subject: UPDATED Media Release City of Toledo Department of Housing and Community Development Announces Public Hearing and Comment Period to the Consolidated Annual Performance and Evaluation Report

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

The Draft CAPER will be available for review beginning **Wednesday, August 31, 2022**, on the website of the following entities:

City of Toledo, Department of Housing and Community Development

One Government Center, 18th Floor
Toledo, Ohio 43604

<https://toledo.oh.gov/departments/housing-community-development>

City of Toledo, Office of the Mayor

One Government Center, 22nd Floor
Toledo, Ohio 43604

toledo.oh.gov/government/mayor

Toledo City Council, Clerk of Council

One Government Center, 21st Floor
Toledo, Ohio 43604

toledo.oh.gov/government/city-council

Lucas Metropolitan Housing

435 Nebraska Ave.
Toledo, Ohio 43604

www.lucasmha.org

Toledo Lucas County Homelessness Board

1220 Madison Ave.
Toledo, Ohio 43604

www.endinghomelessness Toledo.org

Toledo-Lucas County Public Library

325 North Michigan St.
Toledo, Ohio 43604

www.toledolibrary.org

Lucas County Board of Developmental Disabilities

1154 Larc Lane
Toledo, Ohio 43614

www.lucasdd.info

The Fair Housing Center

326 N. Erie St.
Toledo, Ohio 43604

www.toledofhc.org

A public hearing on the CAPER is scheduled as follows:

Thursday, September 1, 2022, at 5:30 p.m. by Virtual Hearing

Please click the link below to join the webinar:

[click here to join webinar](#)

Passcode: 663093

Or one tap mobile:

US: +1408-961-3927,,84247214999#,,,,*663093# or 1855-758-1310,,84247214999#,,,,*663093# (Toll Free)

Or Telephone:

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

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

Webinar ID: 842 4721 4999

Passcode: 663093

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

The City of Toledo will also receive comments from the public in writing beginning **Wednesday, August 31, 2022, through Wednesday, September 14, 2022**, at the following address:

City of Toledo

Department of Housing and Community Development

2021-2022 CAPER

One Government Center, Suite 1800

Toledo, Ohio 43604

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

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AUGUST 17, 2022

City of Toledo Department of Housing and Community Development Announces Public Hearing and Comment Period to the Consolidated Annual Performance and Evaluation Report

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

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City of Toledo, Department of Housing and Community Development
One Government Center, 18th Floor
Toledo, Ohio 43604
<https://toledo.oh.gov/departments/housing-community-development>

City of Toledo, Office of the Mayor
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Toledo, Ohio 43604
toledo.oh.gov/government/mayor

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Lucas Metropolitan Housing
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Toledo, Ohio 43604
www.lucasmha.org

Toledo Lucas County Homelessness Board
1220 Madison Ave.
Toledo, Ohio 43604

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####

Brown, Monica

From: Thorpe, Susan
Sent: Monday, August 29, 2022 9:24 AM
To: abdul.hamadeh@unitedwaytoledo.org; annebauman@compassionhealthtoledo.org; anneruch@gmail.com; antduran8213@gmail.com; aparlet@ecdi.org; awelch@ecdi.org; believecenter@gmail.com; carol.gray@toledogrows.org; cbishop@tlchb.org; chuckp@auroraprojectinc.org; cjamato@gmail.com; cmiller@pathwaytoledo.org; cwattley@nhainc.org; dalexander@familyhousetoledo.org; dargatza@co.lucas.oh.us; DeniseF@auroraprojectinc.org; dgray@nwtoledo.org; dhawkins@toledofhc.org; dpeluso@familyhousetoledo.org; EAST TOLEDO FAMILY CENTER; eellis@toledodesigncollective.org; elaina@believecenter.org; emcpartland@mvhabitat.org; eod.sqacc@gmail.com; frankt@co.lucas.oh.us; gcommu8708@bex.net; grantsadministrator@tlchb.org; grantwriter@spcc-toledo.org; gthomas@toledofhc.org; hzeller@lucasmha.org; ikinney@ecdi.org; jacksonv@co.lucas.oh.us; janeltate@gmail.com; jb_sqacc@yahoo.com; jblack@pathwaytoledo.org; jcintronvega@lucasmha.org; jeffortney@toledofhc.org; jhabib@spcc-toledo.org; jjacobs@lfhtoledo.org; jjarrett@theartscommission.org; jmpinskey@gmail.com; jodig@etfc.org; jswiech@gallonlaw.com; kachinger@mvhabitat.org; kbond@lucasmha.org; kclark@pathwaytoledo.org; kshankleton@lfhtoledo.org; lbanks@lfhtoledo.org; LEGAL AID OF WESTERN OHIO, INC.; lindaskowronek@toledofhc.org; lpengov@spcc-toledo.org; lweller@lawolaw.org; mariemflannery@toledofhc.org; matt.morris@unitedwaytoledo.org; mculling@theartscommission.org; mebadik1956@gmail.com; mfolk@theartscommission.org; mhart@tlchb.org; mhoffman@nhainc.org; michaelj@auroraprojectinc.org; mike.andersonhsi@gmail.com; mindy@seagatefoodbank.org; mjacomet@nwtoledo.org; mjarret@aol.com; mlk.kitchen@att.net; mmcintyre@mvhabitat.org; msachs@nwtoledo.org; mwoff_etsac@yahoo.com; nancy.elzinga@gmail.com; NEIGHBORHOOD HEALTH ASSOCIATION, IN; ntaylor@nwtoledo.org; pageelaine1@aol.com; paul@toledodesigncollective.org; rgagnon@lucasmha.org; rjordan@pathwaytoledo.org; rstone@ablelaw.org; ryan.bunch@unitedwaytoledo.org; scrabtree@ablelaw.org; sfriedman@toledofhc.org; stokest@co.lucas.oh.us; TOLEDO SEAGATE; tpace@familyhousetoledo.org; trish@seagatefoodbank.org; vhill@lucasmha.org; vmartinez@lawolaw.org; Welch,David; wendy.pesttrue@unitedwaytoledo.org; NEIGHBORWORKS TOLEDO REGION; yvonne.dubielak@toledogrows.org; Zgodzinski, Eric
Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene
Subject: 2020-2021 CAPER Public Hearing (REMINDER)
Attachments: 2021-2022 CAPER Public Notice.doc
Importance: High

Good morning,

Just a reminder -

The City of Toledo, Department of Housing and Community Development has scheduled a public hearing on the Draft 2021-2022 Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER includes the undertakings, activities, and accomplishments completed during the 2021-2022 Program Year and

provides an assessment of the federally funded programs administered by the Department of Housing and Community Development.

You are invited to attend the public hearing on the Draft 2021-2022 CAPER.

The public hearing is scheduled as follows:

Thursday, September 1, 2022, 5:30 p.m., by Virtual Hearing

Please click the link below to join the webinar:

<https://toledo-oh-gov.zoom.us/j/84247214999>

Passcode: 663093

Or one tap mobile:

US: +1408-961-3927,,84247214999#,,,,*663093# or 1855-758-1310,,84247214999#,,,,*663093# (Toll Free)

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Webinar ID: 842 4721 4999

Passcode: 663093

International numbers available: <https://toledo-oh-gov.zoom.us/j/84247214999>

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*

Visit us at: www.toledo.oh.gov

PUBLIC NOTICE
CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
for
2021 Program Year – July 1, 2021 to June 30, 2022

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

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

Lucas Metropolitan Housing
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CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2021-2022 CAPER
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

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Fair Housing Report

Fair Housing Action Plan: July 2021 – June 2022 Annual Update

According to HUD's guidance, the plan to address the impediments should:

- List fair housing action(s) to be completed for each objective.
- Determine the time period for completion.
- Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or otherwise support fair housing actions.
- Identify individuals, groups, and organizations to be involved in each action and define their responsibilities. Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated. HUD recommends that jurisdictions specify these commitments in the appropriate contracts that may arise in connection with the fair housing actions.
- Set priorities. Schedule actions for a time period which is consistent with the Consolidated Plan cycle.¹

Consistent with HUD's guidelines, the action plan provided here will help guide the City of Toledo to address the identified local impediments to fair housing.

Action Plan Format and Explanation

The action plan provided on the following pages is organized into charts covering each of the identified goals to address Fair Housing Impediments. Each chart provides objectives as required by HUD's guidelines, City departments with appropriate responsibilities, information about the potential involvement of other partner institutions including The Fair Housing Center, and suggested deadlines for completion. Under chart, space is provided for discussion. As the City moves forward, this "discussion" space will provide notes on progress made or potential changes, or suggestions for changes, to the action plan.

¹ *Id.*

Fair Housing Issue: Criminal History Screening

Goal: Ban the box policy

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

Discussion:

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

No updates this reporting period.

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

- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing.

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

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

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

No updates this reporting period.

Reporting period: January – March 2022 & April – June 2022

In June 2022, HUD released a memo to aid both fair housing enforcement agencies and housing providers in the implementation of HUD's 2016 guidance on criminal history screening. The document includes tips for conducting investigations related to criminal history screening and offers best practices for housing providers to ensure their tenant selection plans comply with fair housing regulations.

Fair Housing Issue: Criminal History Screening

Goal: Set aside affordable housing opportunities

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

Discussion:

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

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

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

Update from LMH:

- For the Emergency Voucher Program, HUD allowed PHAs, like LMH, to waiver certain requirements in the Admin. Plan related to prior criminal activity. LMH has accepted those waivers.
- LMH is also in process of a review of the Admin. Plan in its entirety. That process will include a review, and likely revision to the look back period, so that it

matches the standard set in the ACOP. That is likely to be done within next year as LMH has had a large turn over in leadership within the HCV program.

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

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

Reporting period: January – March 2022 & April – June 2022

The Fair Housing Center contacted LMH to ask if it has any updates to share on this issue and is awaiting a response from LMH.

Fair Housing Issue: Criminal History Screening

Goal: Private housing provider compliance

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

Discussion:

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

TFHC drafted a model criminal history screening policy for housing providers that complies with HUD's 2016 guidelines. This document can serve as a template that housing providers can adopt or use as a guide to develop their own criminal history screening policy that aligns with fair housing recommendations. TFHC plans to share this policy more widely with contacts in the reentry community as well as with housing providers during its regular fair housing training sessions.

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

- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. Discussion has included consideration of an ordinance that would limit the criteria housing providers use to screen tenants, including restrictions on use of criminal history. The group advocates for legislation that would ensure housing providers' tenant selection policies comply with 2016 HUD guidelines regarding criminal history screening, including evaluation of the nature of offenses to determine whether they demonstrate a risk to the safety of the property or residents. These types of policies help to prevent unfair denial of housing to applicants who would otherwise qualify and increase the availability of housing for individuals returning from incarceration.
- TFHC conducted a virtual training focused on fair housing rights for reentry via Zoom and Facebook Live in April 2021, helping reentry advocates and service providers better understand how fair housing laws apply to individuals returning

from incarceration.

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

- The Building Bridges of Opportunity Community Experience virtual conference took place in October 2021, engaging statewide reentry advocates to learn about effective practices for successful reentry, connect to reentry resources, and collaborate with other reentry coalitions. TFHC participated in the conference by conducting a training session on how fair housing rights are applicable to reentry populations, including guidance on use of criminal history screening criteria by housing providers.
- TFHC regularly investigates allegations of housing discrimination based on criminal history.
- TFHC regularly conducts fair housing trainings for housing professionals, and these sessions include guidance for housing providers on how to conduct criminal history screenings in compliance with fair housing and HUD regulations.

Reporting period: January – March 2022 & April – June 2022

- In June 2022, HUD released a memo to aid both fair housing enforcement agencies and housing providers in the implementation of HUD's 2016 guidance on criminal history screening. The document includes tips for conducting investigations related to criminal history screening and offers best practices for housing providers to ensure their tenant selection plans comply with fair housing regulations.
- TFHC regularly investigates allegations of housing discrimination based on criminal history.
- TFHC regularly conducts fair housing trainings for housing professionals, and these sessions include guidance for housing providers on how to conduct criminal history screenings in compliance with fair housing and HUD regulations. In April 2022, to commemorate national Fair Housing Month and Second Chance Month, TFHC conducted a virtual training on how fair housing rights apply to reentry.

Fair Housing Issue: Homeownership: Lending and Insurance

Goal: Encourage private lenders to provide credit opportunities in minority and low-income neighborhoods

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

Discussion:

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

TFHC continues to work with KeyBank and Premier Bank (formerly First Federal Bank) to make lending accessible in underserved communities. TFHC met with KeyBank on 9/23/2020 and 2/1/2021. TFHC met with Premier Bank on 10/30/2020.

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

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

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

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

access to homeownership by supporting first-time homebuyers in historically underserved neighborhoods.

Reporting period: January – March 2022 & April – June 2022

- In June 2022, a press conference was held to celebrate the Robinsons, new homeowners who benefitted from a partnership of The Fair Housing Center, KeyBank, and NeighborWorks Toledo Region to help improve access to homeownership in historically underserved neighborhoods. The home mortgage program, funded by KeyBank and administered by NeighborWorks, offers more flexible terms to make homeownership more accessible for borrowers who would not qualify for a traditional loan. With help from this program along with the City of Toledo's down payment assistance program, the Robinsons were able to make the dream of homeownership a reality.
- The Fair Housing Center, along with the National Fair Housing Alliance (NFHA) and 19 other local fair housing organizations throughout the country, reached a landmark \$53 million agreement with Fannie Mae to resolve a case arising from allegations that Fannie Mae treated foreclosed homes in communities of color unfavorably. Approximately \$755,000 of the settlement will be directed towards community reinvestment in the Toledo area. The Fair Housing Center will administer these funds and conducted outreach to seek input from the community (residents and organizations) as to how the settlement should best be utilized to restore and revitalize neighborhoods of color that were harmed by these discriminatory practices.
- In addition to these recent developments itemized below, TFHC continues to litigate other cases against banks for their REO practices including Deutsche Bank and Bank of America, and more generally it continues to make itself available for victims of housing discrimination who contact TFHC. Finally, TFHC began advertising for a position of an attorney to work for TFHC who would focus a portion of their time on Community Reinvestment Act advocacy which would include monitoring bank activity.

Fair Housing Issue: Homeownership: Lending and Insurance

Goal: Address insurance discrimination issues

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

Discussion:

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

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

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

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

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

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

Reporting period: January – March 2022 & April – June 2022

- As mentioned in the previous reporting period, TFHC was successful in a mandamus action to require the Ohio Fair Plan to provide data and information on access to insurance in Ohio. The Ohio Fair Plan has appealed the case to the Ohio Supreme Court. The Fair Housing Center has now briefed this issue before the Ohio Supreme Court and TFHC requested an oral argument before the Court. Almost every legal aid organization in Ohio filed an *amicus* brief before the Ohio Supreme Court to support TFHC in this case. The case is still pending before the Ohio Supreme Court.

Fair Housing Issue: Homeownership: Lending and Insurance

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

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

Discussion:

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

- TFHC continues to work with KeyBank to create a much-needed community loan product.
- While TFHC continues its work as listed above, TFHC suggests that the City should convene a meeting of local banks to discuss improving the products that they make available to Toledoans, especially in majority-minority neighborhoods.

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- At the same time, TFHC plans to analyze more closely local HMDA data that will become available later in 2021. TFHC is in discussions with other researchers to help with analysis of this data. This information may be helpful to report publicly in order to encourage banks to improve lending services.

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

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

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

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

Reporting period: January – March 2022 & April – June 2022

- In June 2022, a press conference was held to celebrate the Robinsons, new homeowners who benefitted from a partnership of The Fair Housing Center, KeyBank, and NeighborWorks Toledo Region to help improve access to homeownership in historically underserved neighborhoods. The home mortgage program, funded by KeyBank and administered by NeighborWorks, offers more flexible terms to make homeownership more accessible for borrowers who would not qualify for a traditional loan. With help from this program along with the City of Toledo's down payment assistance program, the Robinsons were able to make the dream of homeownership a reality.
- The Fair Housing Center, along with the National Fair Housing Alliance (NFHA) and 19 other local fair housing organizations throughout the country, reached a landmark \$53 million agreement with Fannie Mae to resolve a case arising from allegations that Fannie Mae treated foreclosed homes in communities of color unfavorably. Approximately \$755,000 of the settlement will be directed towards community reinvestment in the Toledo area. The Fair Housing Center will administer these funds and conducted outreach to seek input from the community (residents and organizations) as to how the settlement should best be utilized to restore and revitalize neighborhoods of color that were harmed by these discriminatory practices.

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- In addition to the updates listed above, TFHC continues to litigate REO discrimination cases against Deutsche Bank and Bank of America. TFHC is also in the process of recruiting for a new position of an attorney who will focus a portion of their time on CRA advocacy and monitoring bank performance.

Fair Housing Issue: Accessibility for persons with disabilities

Goal: Enforce current visitability and accessibility rules

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

Discussion:

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

Update from TFHC:

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

Update from The Ability Center:

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

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- 9/29/2020: Housing Equity Policy Group
 - 10/15/2020: COT 10 year Housing Action Plan
 - 12/16/2020: DD Council Housing Policy Panel

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

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

Update from The Ability Center:

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

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

Update from TFHC:

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

Reporting period: January – March 2022 & April – June 2022

Update from TFHC:

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

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- TFHC recently filed a lawsuit against Clover Communities and other defendants who are developers of senior housing. The suit was filed in collaboration with other fair housing organizations. There are two projects in Northwest Ohio that are the subject of the lawsuit and other projects are located throughout the U.S. While the projects are not specifically located in the City of Toledo, they do offer a testament to the importance of compliance with the law throughout the area.
 - TFHC also continues to regularly visit newly constructed projects throughout the area to review for compliance with accessibility rules.

Update from The Ability Center:

- NOTE: TFHC has contacted the Ability Center of Greater Toledo to request updates for purposes of this report. However, the Ability Center was not able to respond within the deadline for the reporting period.

Fair Housing Issue: Accessibility for persons with disabilities
Goal: Encourage developers to increase accessibility

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

Discussion:

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

Update from TFHC:

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

Update from The Ability Center:

- Ability Center convened the Universal Design Coalition, which put together a list of desired single-family housing accessibility features.

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- The Universal Design Coalition made contact with an architect who will give a free consultation to single-family developers on how to adapt their plans in order to offer an accessible/ visitable plan to potential customers.
 - The Ability Center monitored reports from the City of Toledo and gave input into the plans of four different multi-family housing developments.
 - 8/25/2020: Housing Equity Roundtable
 - 9/2/2020: Ohio Housing Policy Panel
 - 9/29/2020: Housing Equity Policy Group
 - 10/15/2020: COT 10 year Housing Action Plan
 - 12/16/2020: DD Council Housing Policy Panel

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

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

Update from The Ability Center:

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

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

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

Update from TFHC:

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

Reporting period: January – March 2022 & April – June 2022

Update from TFHC:

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

Updates from The Ability Center:

- The Ability Center and TFHC, in collaboration are planning and preparing for an ADA seminar in October of 2022. The seminar will include presentations from TFHC, the Ability Center, and national experts on accessibility issues.

Fair Housing Issue: Source of income discrimination and voucher mobility

Goal: Enact local source of income discrimination protections

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

Discussion:

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

An ordinance prohibiting discrimination based on source of income—initially introduced to Toledo City Council in 2018 but not acted upon—was reintroduced in the fall of 2020. The legislation updates the City of Toledo's already existing anti-discrimination ordinance to include source of income as an additional protected class, effectively requiring housing providers to accept all legal, reliable sources of income including disability and military benefits, Social Security, and Housing Choice Vouchers (HCV). Public hearings were held by City Council, including a Neighborhoods Committee meeting and a Committee of the Whole meeting, which featured presentations from

several community partners and allowed for public input. The legislation received support from organizations including TFHC, LMH, The Ability Center, ABLE, TLCHB, MHR SB, UPSE, and United Way of Greater Toledo. Many landlords and property owners expressed opposition to the ordinance, citing a reluctance to accept vouchers and participate in the HCV program. Legislation passed in December 2020 and goes into effect 120 days after passage. Partners including TFHC and LMH are developing an educational campaign to inform housing providers about the ordinance, in an effort to address FAQs, help housing providers become more familiar with the HCV program, and encourage compliance. Plans include distributing informational documents and hosting an online training session.

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

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

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

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

Reporting period: January – March 2022 & April – June 2022

- TFHC regularly investigates allegations of discrimination based on source of income.
- TFHC assists housing providers in complying with SOI protections by conducting trainings, distributing educational materials, and providing guidance on policies and practices. In April during Fair Housing Month, TFHC conducted a training for Northwest Ohio Realtors (NOR) that offered guidance for housing providers on understanding and complying with local ordinances affecting rental properties, which included discussion of source of income protection.
- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement of SOI and other local civil rights protections.
- SOI protection has prompted many questions from both tenants and landlords about how to properly screen applicants, especially when it comes to requirements that applicants have three times the monthly rent in income, which often poses a barrier for tenants with nontraditional sources of income. The Fair Housing Center developed guidance documents for both landlords and tenants on how to ensure tenant selection policies comply with this local protection.

Fair Housing Issue: Source of income discrimination and voucher mobility

Goal: Increase voucher mobility

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

Discussion:

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

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

address FAQs, help housing providers become more familiar with the HCV program, and encourage compliance. Plans include distributing informational documents and hosting an online training session.

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

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

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

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

Reporting period: January – March 2022 & April – June 2022

- TFHC regularly investigates allegations of discrimination based on source of income.
- TFHC assists housing providers in complying with SOI protections by conducting trainings, distributing educational materials, and providing guidance on policies and practices. In April during Fair Housing Month, TFHC conducted a training for Northwest Ohio Realtors (NOR) that offered guidance for housing providers on understanding and complying with local ordinances affecting rental properties,

which included discussion of source of income protection.

- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement of SOI and other local civil rights protections.
- SOI protection has prompted many questions from both tenants and landlords about how to properly screen applicants, especially when it comes to requirements that applicants have three times the monthly rent in income, which often poses a barrier for tenants with nontraditional sources of income. The Fair Housing Center developed guidance documents for both landlords and tenants on how to ensure tenant selection policies comply with this local protection.

Updates from LMH:

- TFHC requested additional information from LMH for purposes of this portion of the report. However, LMH was unable to respond within the deadline for the reporting period.

Goal: Enforce Fair Housing protections

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

Discussion:

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

TFHC Enforcement Summary:

- Total new cases: 26

By protected class:

- 17 Disability
- 4 National Origin
- 2 Race
- 3 Sex

By issue:

- 2 Harassment
- 21 Rental
- 2 Sales
- 1 Zoning

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

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

TFHC Enforcement Summary:

- Total new cases: 65

By protected class:

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

By issue:

64 Rental
1 Sales

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

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

- Total new cases: 57

By protected class:

39 Disability
0 National Origin
13 Race
5 Sex

By issue:

0 Harassment
56 Rental
1 Sales
0 Zoning

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

Reporting period: January – March 2022 & April – June 2022

TFHC Enforcement Summary:

- Total new cases: 59

By protected class:

- 1 Color
- 38 Disability
- 0 Familial Status
- 0 National Origin
- 17 Race
- 0 Religion
- 3 Sex

By issue:

- 55 Rental
 - 2 Sales
 - 1 Zoning
 - 1. Design & Construction
- 1,136 Referrals

Fair Housing Issue: Increase awareness of fair housing rights and responsibilities

Goal: Engage in education and outreach activities

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Conduct fair housing trainings and presentations	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	TFHC will coordinate and manage	Ongoing, reported quarterly
Distribute fair housing educational materials	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	TFHC will coordinate and manage	Ongoing, reported quarterly
Place advertisements and seek media coverage of fair housing issues		Local media outlets, including print, television, radio, and digital	TFHC will coordinate and manage	Ongoing, reported quarterly
Participate in outreach events			TFHC will coordinate and manage	Ongoing, reported quarterly
Post fair housing information on website and social media	Mayor's office will share content as appropriate		TFHC will coordinate and manage	Ongoing, reported quarterly

Discussion:

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

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 3,489,762
- Distribution of fair housing brochures and educational materials: 17,522
- Trainings conducted: 15
 - Persons trained: 208

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

TFHC Education and Outreach Summary:

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

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

TFHC Education and Outreach Summary:

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

Reporting period: January – March 2022 & April – June 2022

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 16,771,345

- Distribution of fair housing brochures and educational materials: 2,838
- Trainings conducted: 31

Persons trained: 1,055

Fair Housing Issue: Voucher Mobility

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

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

Discussion:

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

No updates this reporting period.

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

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

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

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

Reporting period: January – March 2022 & April – June 2022

TFHC requested additional information from LMH for purposes of this portion of the report. However, LMH was unable to respond within the deadline for the reporting period.

Fair Housing Issue: Land Use and Zoning

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

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

Discussion:

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

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

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

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

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

In October 2021, Toledo City Council approved Warren Commons, a proposed 46-unit permanent supportive housing project to provide safe, stable housing options for individuals who are experiencing homelessness, returning from incarceration, in recovery, or diagnosed with mental health conditions. The project will support residents by connecting them to local services and resources including education, employment, and health care. The \$11 million development is a partnership of TASC of Northwest

Ohio and Community Housing Network. The project received competitive low-income housing tax credits from the Ohio Housing Finance Agency to help fund its construction. Tenants will receive housing-choice vouchers through Lucas Metropolitan Housing to cover their rent. The proposal received support from many local organizations including TFHC, MHR SB, and TLCHB but many neighbors expressed opposition.

Reporting period: January – March 2022 & April – June 2022

- Community partners including The Fair Housing Center, The Ability Center, ABLE, and MHR SB collaborated with Plan Commission staff to update the City of Toledo's zoning code regulating group living. Facilities impacted by the policy include nursing homes, group homes for individuals with mental health conditions, developmental disabilities, or who are in recovery, homeless shelters, halfway houses, and group rentals. The purpose of the revisions is to bring Toledo's zoning code into better alignment with state and federal law by removing or revising outdated (and in some cases offensive) terminology, reducing unfair restrictions on housing for persons with disabilities that do not apply to other types of housing, and defining housing categories based on the size and type of facility rather than the type of people living in the property. A proposed text amendment was drafted by Plan Commission staff and approved by the Plan Commission board. Community partners support the text amendment but are requesting additional changes to reduce restrictions on the location and spacing of group homes. Advocates support the recommended changes as a way to improve access to supportive housing opportunities throughout the community and prevent NIMBYism from blocking critical housing projects. The proposal is currently before City Council's Neighborhoods and Community Development Committee for consideration.
- After facing rejection for a prior proposal, Unison requested a SUP for a 16-bed residential treatment center for individuals with mental illness and substance use disorders. In addition to providing transitional housing, the facility would also offer counseling, case management, life skills training, employment coaching, and medication management. The project was approved by the Plan Commission and Toledo City Council.

Fair Housing Issue: LGBTQIA+

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

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

Discussion:

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

No updates this reporting period.

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

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

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

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

Reporting period: January – March 2022 & April – June 2022

- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement local civil rights protections such as sexual orientation and gender identity.
- TFHC regularly conducts trainings for community members and housing providers to educate them on fair housing rights and responsibilities, and these trainings have been updated to include information about protections for sexual orientation and gender identity.

Fair Housing Issue: Homelessness and Affordable Housing

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

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

Discussion:

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

No updates this reporting period.

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

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

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

No updates this reporting period.

Reporting period: January – March 2022 & April – June 2022

- In April 2022, community partners including TFHC, TLCHB, LMH, Lucas County, City of Toledo, LAWO, United Way of Greater Toledo, and several others announced a new collaboration aimed at preventing evictions and improving housing stability. Providers will work together to support residents with a variety of housing resources to ensure all of their needs are met and keep them stably housed.
- TLCHB is coordinating and leading a multi-agency Eviction Prevention partnership to provide a holistic approach to combating the crisis of eviction in the City of Toledo and further collaborative efforts enhancing the Continuum of Care's Prevention and Diversion activities.

Fair Housing Issue: Housing Conditions

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

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

Discussion:

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

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

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

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

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

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

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- Coordinated partnership for BP Husky Settlement grant with Toledo-Lucas County Health Department. This will provide an additional \$1.2 mil of funding to be braided with the Dept of Neighborhoods' current Lead Hazard Control grant program.
 - Launched rental registry education and enforcement with help of Lucas County Auditor on June 30th, 2021. Working with Code Enforcement and the Auditor to develop best practice enforcement tools on how to partner as registering rental properties in Toledo is Step #1 to becoming lead-safe and assuring we have accurate data of rentals in our community.
 - TLPPC formed the Community Engagement/Education Subcommittee to increase awareness and knowledge among community members regarding lead poisoning beginning with primary prevention for lead safe environments for children. Members include representatives from healthcare systems, educational systems, pediatricians/healthcare providers, school nurses, housing, parents of lead-affected children, city/county government and legal representation. Activities completed and in progress during this reporting period:
 - Formation of subcommittee with 14 members
 - Regular email communications with subcommittee members assessing progress of work, questions, and concerns
 - Development of brochures and handouts for health professionals
 - Flyer created for parents/guardians by Lucas County Family Council including resources regarding screening young children and lead safe housing
 - Meetings scheduled with school nurse and advisory board of Escuela Smart TPS bilingual elementary school to initiate blood lead level screenings for children K to 8th grade and educational sessions for parents/guardians
 - Training meeting, 2 hours per Zoom, provided June 16, 2021 by Dr. Marilynne Wood for Health Connections Advisory Group
 - Discussions with ProMedica Health, Paramount and St. Vincent Mercy Health System regarding work of the TLPPC and coordination of community blood lead level screenings and lead poisoning prevention education for families
 - The Lucas County Land Bank and the City hired a consultant to assess Toledo's code enforcement needs and recommend how the city can more effectively and equitably address nuisance properties and code violations. Findings were presented to City Council in March 2021. Recommendations included:
 - The City should move away from being reactive and relying on housing court to instead encourage voluntary compliance.

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- The City should form a neighborhood conditions working group so multiple interested parties can share information about problem properties, prioritize issues, and work together to bring a resolution.
 - The City should offer home repair grant and loan programs to offset the financial burden of compliance for property owners.

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

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

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

coordinator staffing role.

- **OUTREACH:** Ongoing outreach, communication, and partnership building with Toledo Lead Poisoning Prevention Coalition, Owner Advisory Group, Lucas Metropolitan Housing, Lucas County Land Bank, Mercy, ProMedica, other healthcare and pediatricians, TPS, early childhood education resources, Help Me Grow, Ohio Department of Health, Governor's Lead Advisory Council, Ohio Healthy Homes Network, NeighborWorks, Historic South Initiative, Maumee Valley Habitat, etc.

Reporting period: January – March 2022 & April – June 2022

- The first lead-safe certification deadline for rental properties was set for June 30, 2022, but a lawsuit challenging the City's ordinance has placed a temporary hold on enforcement efforts until the legal challenges are resolved.
- Update from Monica Smith, City of Toledo Lead Safe Coordinator:

Lead Ordinance & Rental Registry Compliance

1-4 rental units built before 1978 must receive a Lead-Safe Certificate, issued by the Toledo-Lucas County Health department, by their phase-in deadlines over the next 5 years. We estimate approximately 35,000 units will have to comply with this deadline. All rental properties in Toledo must register with the Lucas County Auditor as rentals under the Ohio Revised Code and also as their first step to receive a Lead-Safe Certificate. Numbers reflect current totals.

- Toledo Rental Registry Units: 17,829
- Lead-Safe Certified Units: 2215 as of 7-21-22, a 17.7% increase since 5-31-2022
- Phase I Lead Safe Certificates: 936 as of 7-21-22, a 27% increase since 5-31-2022

Workforce Development

To properly implement the lead-safe ordinance and administer our remediation grants, we need to build workforce capacity. Licensed inspectors below include Clearance Technicians, Lead Inspectors, and Lead Risk Assessors as defined by the Ohio Department of Health (ODH) who have been approved to do work by the Toledo-Lucas County Health Department (TLCHD). Abatement companies below include Lead Abatement Workers and Lead Abatement Contractors as defined by the Ohio Department of Health that are approved to perform lead abatement work for the City of Toledo under our grant programs. Numbers reflect current totals.

- Licensed Inspectors: 50
- Licensed Abatement Companies: 7

On June 16 and 17, 2022, TLCHD and the City of Toledo offered the Clearance Technician class at no cost to students.

- Number of Participants: 26
- Registered for ODH Clearance Technician Exam: 26

Phone Calls Received

May 31 – July 21: 1,890 (Engage Toledo, Department of Housing and Community Development)

Reporting period: March – July, 2022

OUTREACH/EDUCATION:

- 2022 Annual Investors Trade Fair to distribute information about lead and the lead ordinance
- Press conference at TLCHD to remind residents of the Phase I deadline date June 30, 2022.
- Approximately 6200 reminder letters were mailed to residents residing in the Phase I area.
- Distribution of Lead Education Board Books to Toledo Public Schools, Board of Developmental Disabilities, YMCA, and Early Head Start
- Discussions with the Environmental Protection Agency to conduct lead education seminars and trainings at no cost to participants.
- Continued development and implementation. Updated educational billboards, radio ads, videos, and social media campaigns.

ONGOING WEBSITE UPDATES:

- Continued development and expansion of www.ToledoLeadSafe.com website. New features include FAQs, Forms (for inspectors), current staff information, updated Early Bird Matching Grant applications.

HIRING PERSONNEL:

- Updated and reposted Lead Enforcement Specialist position to work with Lead Safe Coordinator and Code Compliance to handle program administration and fines/penalty processing.

WORKFORCE DEVELOPMENT:

- Small business class taught by Assets Toledo (26 participants)

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- Lead Clearance Technicians classes taught by Toledo Lucas County Health Department (26 participants)

ORDINANCE:

- Working with code compliance and Law Department to continue to process and streamline reminder letters and enforcement

Fair Housing Issue: Public Transportation

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

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

Discussion:

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

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

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

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

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

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

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

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

Reporting period: January – March 2022 & April – June 2022

- TARTA is continuing work to expand its services county wide as explain above. One recent development is a commitment from TARTA to provide county-wide transportation comparable to paratransit for persons with disabilities. The concept will be tested in a focused area and then expanded based on needs. This development is particularly important for persons with disabilities to be able to access county-wide transit.

Fair Housing Issue: Impediments in Rental Housing
Goal: Address the eviction crisis in Toledo

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

Discussion:

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

- As part of its new Landlord-Tenant Mediation program, TFHC conducted recurring Facebook live trainings to educate tenants and landlords on their rights and responsibilities.
- The City of Toledo and other agencies are currently providing emergency rental assistance and plan to continue these programs as funds are available.

However, these programs must be improved and increased. Accessing the program can be difficult. Requirements for these programs that the City adds locally and that HUD does not require must be removed. Wherever possible, the City should increase funds available.

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

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

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

to Counsel has proven successful in other cities to help tenants better understand and assert their rights, thereby preventing unnecessary evictions. It's expected to be introduced to City Council in August.

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

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

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

Reporting period: January – March 2022 & April – June 2022

- TFHC continues to operate its Pre-Litigation Landlord Tenant Mediation Program for residents of Lucas County, offering free, confidential mediation services to resolve rental disputes and prevent evictions.
- In April 2022, community partners including TFHC, TLCHB, LMH, Lucas County, City of Toledo, LAWO, United Way of Greater Toledo, and several others announced a new collaboration aimed at preventing evictions and improving housing stability. Providers will work together to support residents with a variety of housing resources to ensure all of their needs are met and keep them stably housed.

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- In March 2022, the City of Toledo announced an additional \$19.4 million in emergency rental assistance funds to help tenants struggling to pay rent due to the impact of the pandemic.

Fair Housing Issue: Impediments in Rental Housing

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

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

Discussion:

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

Update from TFHC:

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

Update from The Ability Center:

- The Ability Center operates a Home Accessibility Program where it provides ramps at no-cost to homeowners with disabilities.

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- The Ability Center fielded 215 calls from individuals with disabilities who had housing issues.
 - 8/25/2020: Housing Equity Roundtable
 - 9/2/2020: Ohio Housing Policy Panel
 - 9/29/2020: Housing Equity Policy Group
 - 10/15/2020: COT 10 year Housing Action Plan
 - 12/16/2020: DD Council Housing Policy Panel
 - Ramps built:
 - 24 - grants & waiver
 - 8 – temp ramp program
 - 1 – hospice

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

Update from TFHC:

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

Update from The Ability Center:

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

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- Ramps built:
 - 15 – grants & waiver
 - 9 – temp ramp program
 - 2 – hospice

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

Update from TFHC:

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

Update from The Ability Center:

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

Reporting period: January – March 2022 & April – June 2022

Update from TFHC:

- Number of RA/RMs granted for persons with disabilities: 9 cases (17 persons)
- 30 out of 53 new cases (56%) were based on disability discrimination
- TFHC regularly conducts fair housing trainings for community groups and housing professionals, distributes educational materials, places advertisements in various media outlets, posts information on its website and social media, distributes

quarterly newsletters, and has staff representatives serving on various community committees, boards, and coalitions. These activities help to raise awareness about housing rights for persons with disabilities.

- TFHC conducted several fair housing trainings with a specific focus on reasonable accommodations and modifications for persons with disabilities. This includes two training sessions for LMH as well as other training sessions for private housing providers that were the result of fair housing complaint settlements.

Update from The Ability Center:

TFHC requested additional information from the Ability Center for purposes of this portion of the report. However, the Ability Center was unable to respond within the deadline for the reporting period.

Fair Housing Issue: Access to Water Services

Goal: Adopt policy and practice improvements through Water Affordability and Consumer Protection Committee

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review and revise consumer policies and programs as needed	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Participate in committee meetings and offer input	Ongoing, reported quarterly
Collect and analyze data related to water access and affordability	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Participate in committee meetings and offer input	Ongoing, reported quarterly
Educate consumers about assistance programs	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Connect clients to community resources	Ongoing, reported quarterly
Outreach to residents and neighborhood groups to seek input on water access and affordability	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Advocacy for policies that support housing needs	Ongoing, reported quarterly

Discussion:

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

- The Water Affordability and Consumer Protection Committee has been meeting monthly to discuss policies and legislation to improve water access and affordability for all residents. Representatives from City Council, DPU, TFHC, Ohio Environmental Council, Freshwater Future, Junction Coalition, UPSE, and neighborhood residents attend meetings. Data has been requested and provided by DPU to help members analyze water issues and identify who is being impacted. Committee members communicated the need for a water affordability study to better understand the scope of the community's needs and make appropriate recommendations for changes to the City's water policies. An RFP was developed and posted, and a contractor was selected to begin work. The committee also drafted an ordinance to establish a debt forgiveness program that would enable residents to eliminate past due balances and avoid water shutoffs. The ordinance is currently under review by the City's law dept.
- City Council passed an ordinance in June 2020 to help protect tenants from water shut offs that occur when owners do not pay the water bill or request termination of water services. The new ordinance, drafted by TFHC, enables tenants to pay the water bill to avoid disconnection and gives them the right to deduct these costs from future rent payments. Further, it prohibits the Department of Public Utilities from terminating water service to occupied rental properties, which prevents owners from shutting off utilities as a form of "self-help eviction" to force tenants to leave. Water is essential for a home to be safe, healthy, and habitable, and this legislation will ensure tenants are not denied the right to this vital resource.

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

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

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

- Because Ohio law requires that water service be set up in the landlord's name, complications arise when tenants are asked to pay for water but do not have

access to the account. In an effort to combat the confusing and abusive practices that often arise when water costs are passed onto tenants, TFHC educated the community and City Councilpersons on the need for revisions to Toledo's local rules on water reselling. Approved by City Council in August 2021, the legislation restricts landlords from charging tenants separately for water unless they meet specific conditions. For rental properties with more than one unit, owners may not charge tenants separately for water unless they obtain permission through a contract with the Department of Public Utilities and meet sub-metering requirements for each unit. For single-family rental properties, owners may not charge tenants separately for water unless they set up a landlord-tenant agreement with the Department of Public Utilities, giving the tenant direct access to the water account.

- TFHC created and distributed an educational document outlining Toledo's local regulations related to water access for rental properties.
- Ohio Environmental Council hosted its annual law conference in November 2021, featuring an extensive discussion about efforts Toledo has made to address environmental justice issues and provide better access to clean water. The conference included a presentation from TFHC's VP and General Counsel George Thomas on the disparate impact of water shut-offs on low-income neighborhoods and communities of color.

Reporting period: January – March 2022 & April – June 2022

In April during Fair Housing Month, TFHC conducted a training for Northwest Ohio Realtors (NOR) that offered guidance for housing providers on understanding and complying with local ordinances affecting rental properties, which included information on regulations for water services.

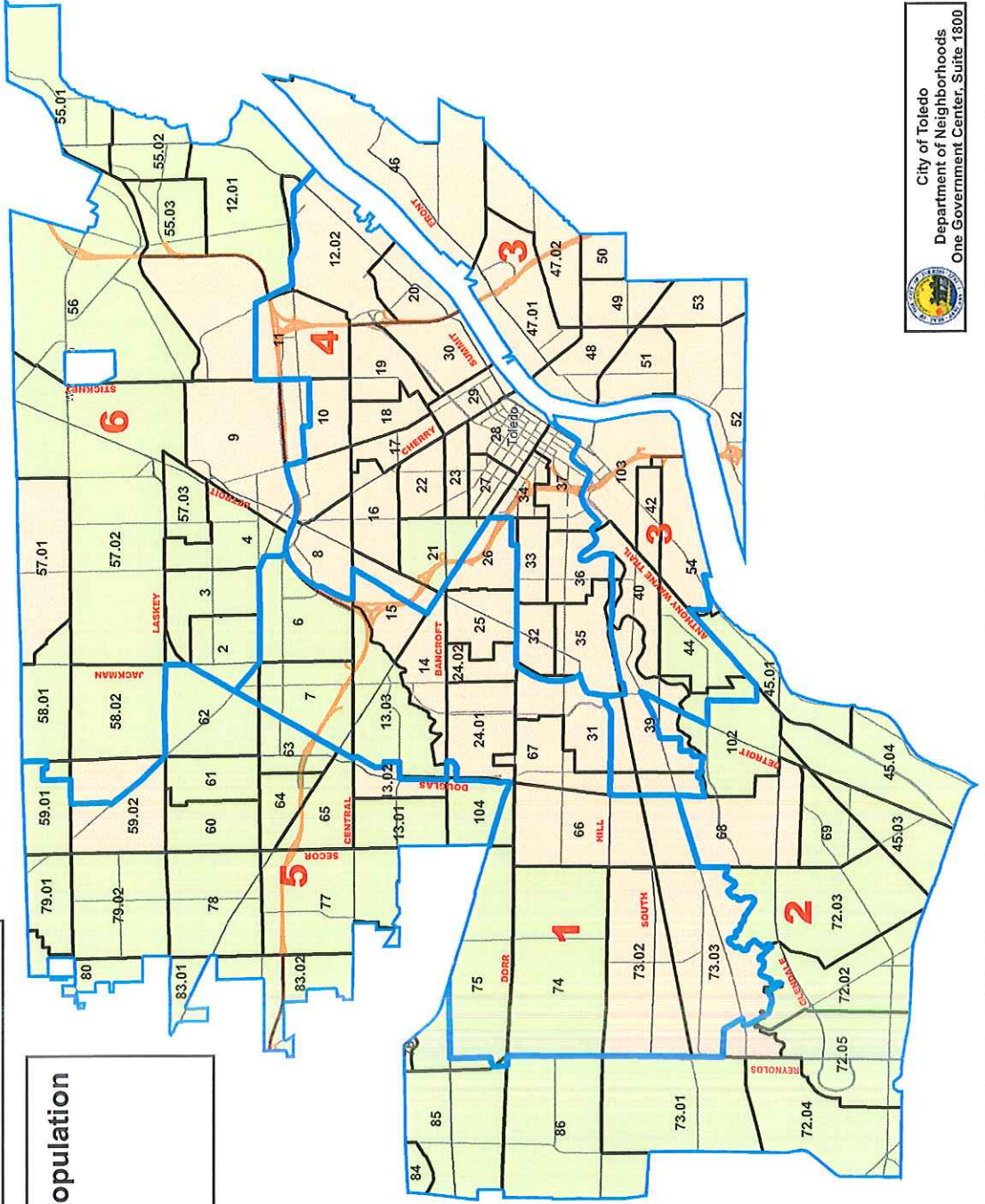


Maps

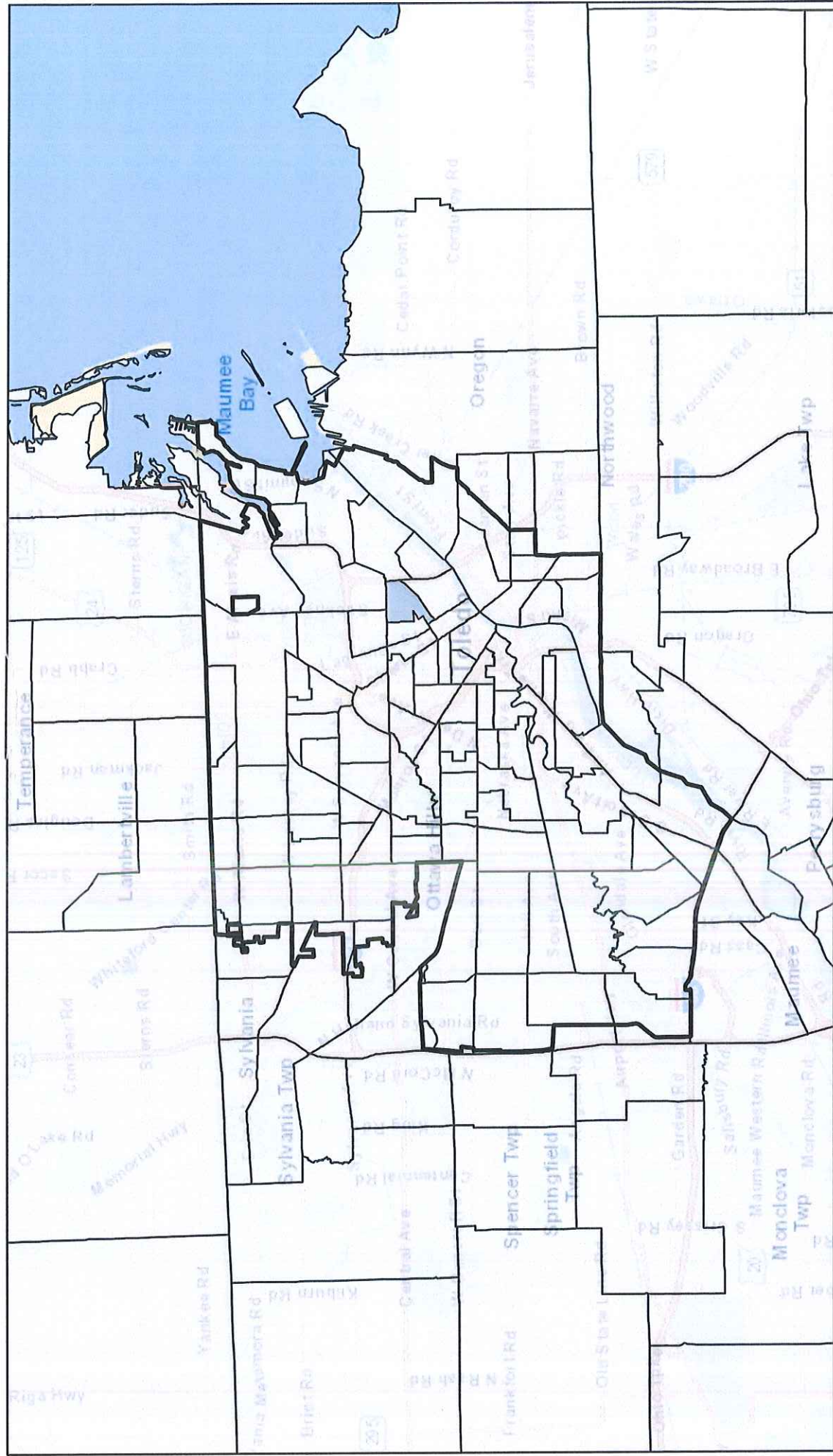
City of Toledo 2020 Low - and - Moderate Income (LMI) Census Tracts

Low - and - Moderate Income by Population

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



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



April 29, 2021

Override 1 2.48-9.78%

AmericanIndianAlaskaNativeAlone

0-2.48%

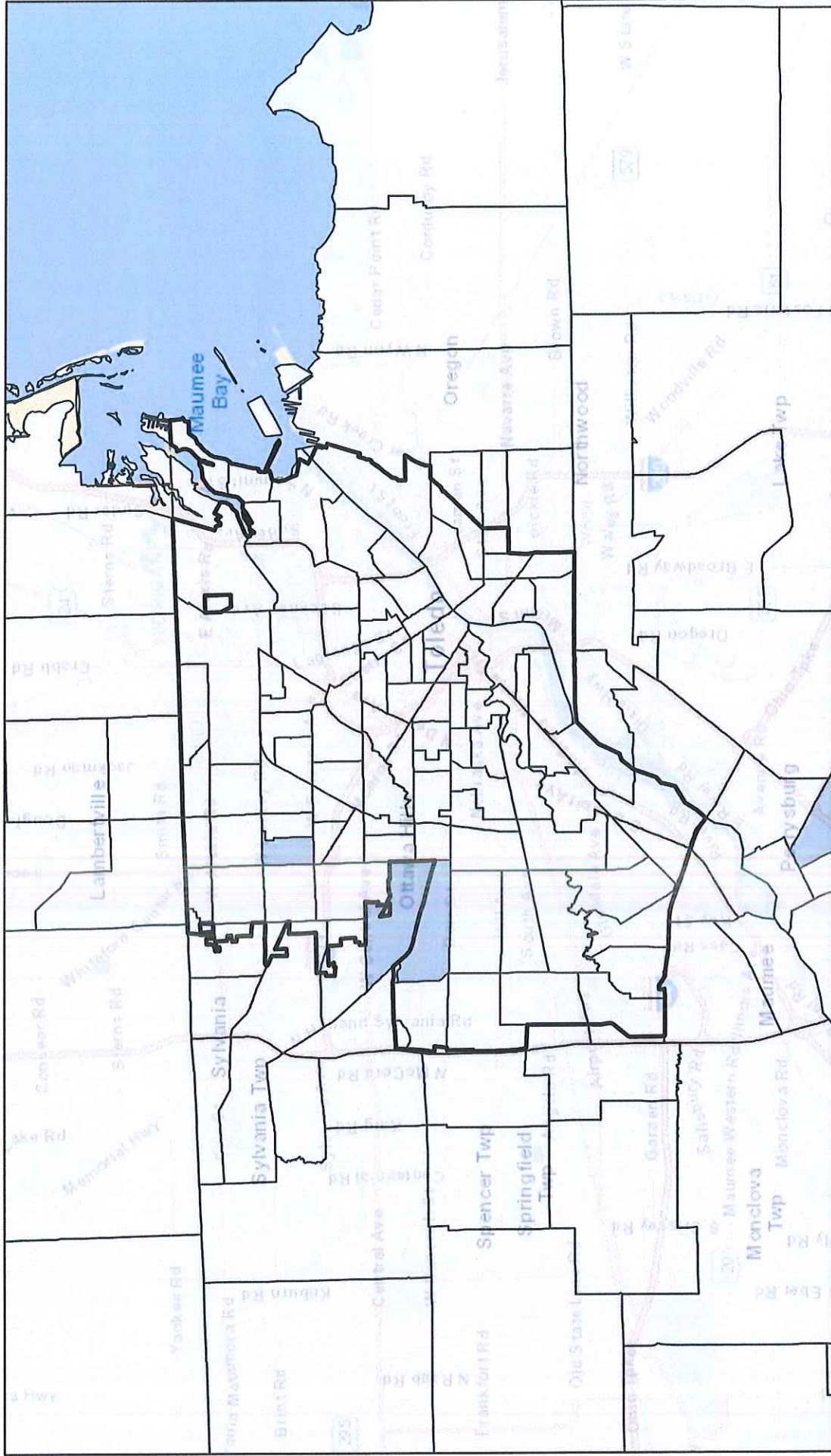
1:220,308

0 1.25 2.5 5 mi

0 2.25 4.5 9 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 -



April 29, 2021

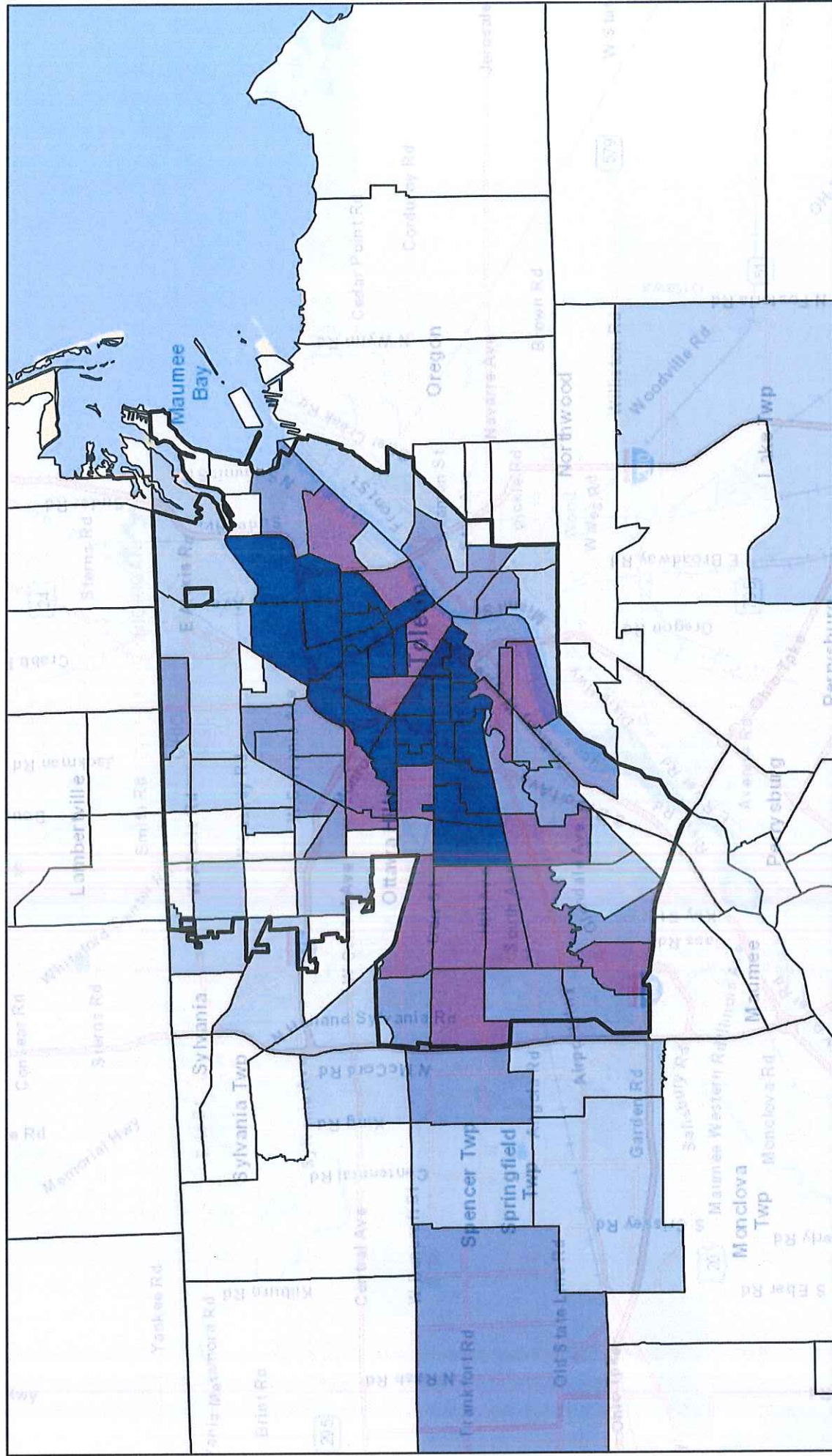


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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

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



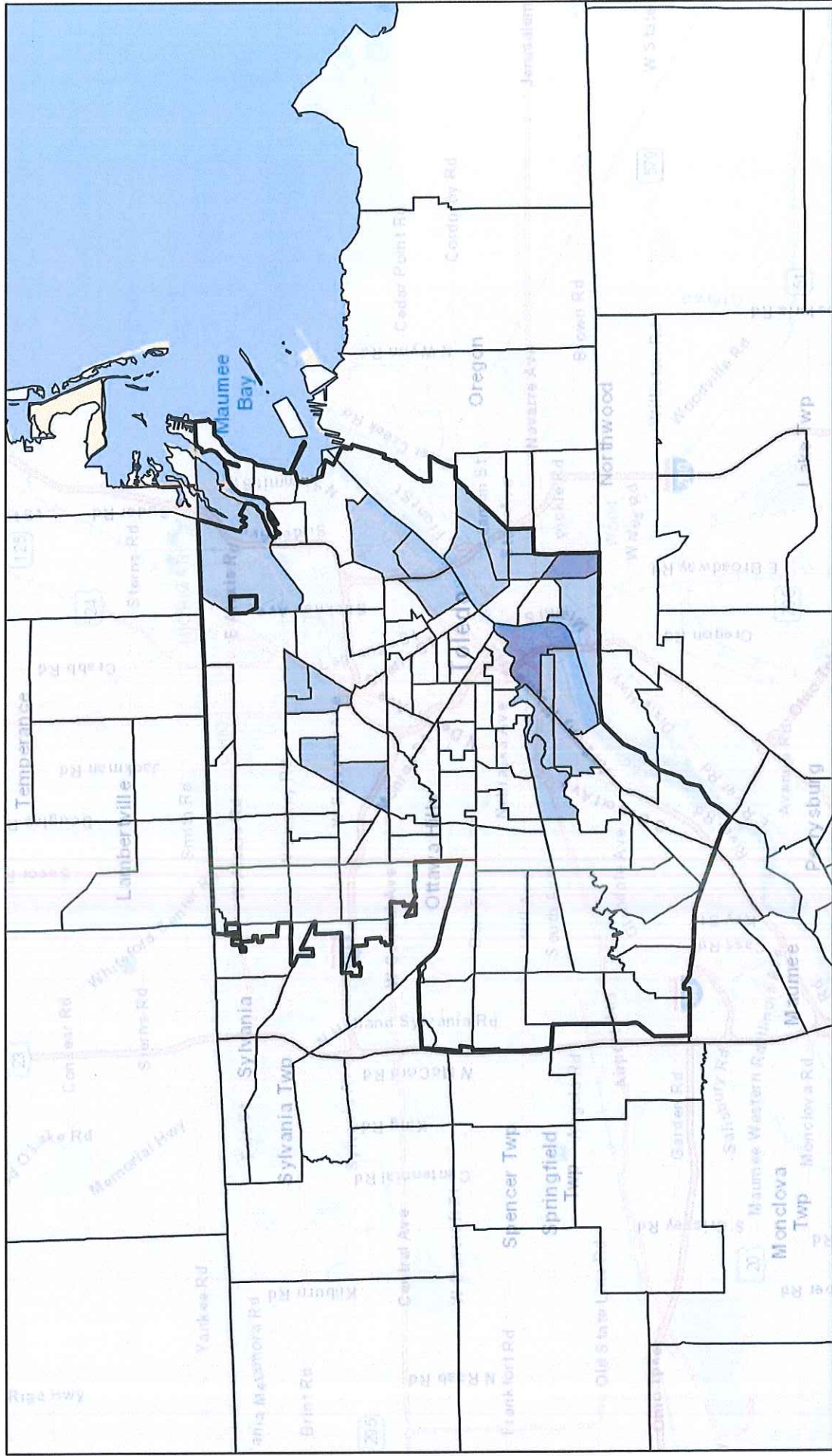
April 29, 2021

1:217,967

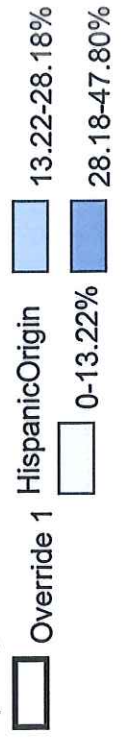


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Hispanic Population in Toledo - Concentration of Minorities per Census Tract -

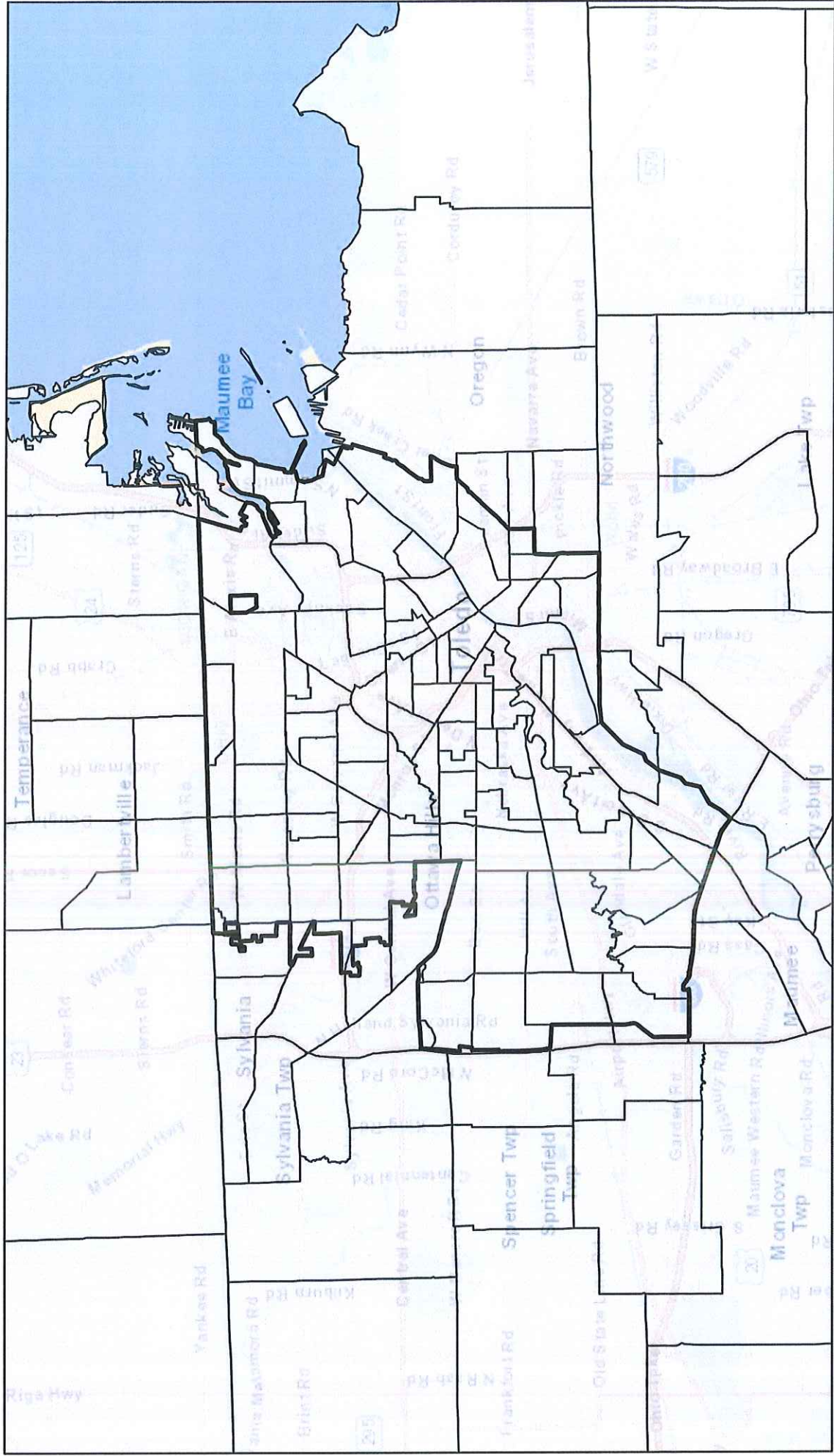


April 29, 2021



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

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



April 29, 2021

Override 1

NativeHawaiianPacificIslanderAlone

0-2.28%

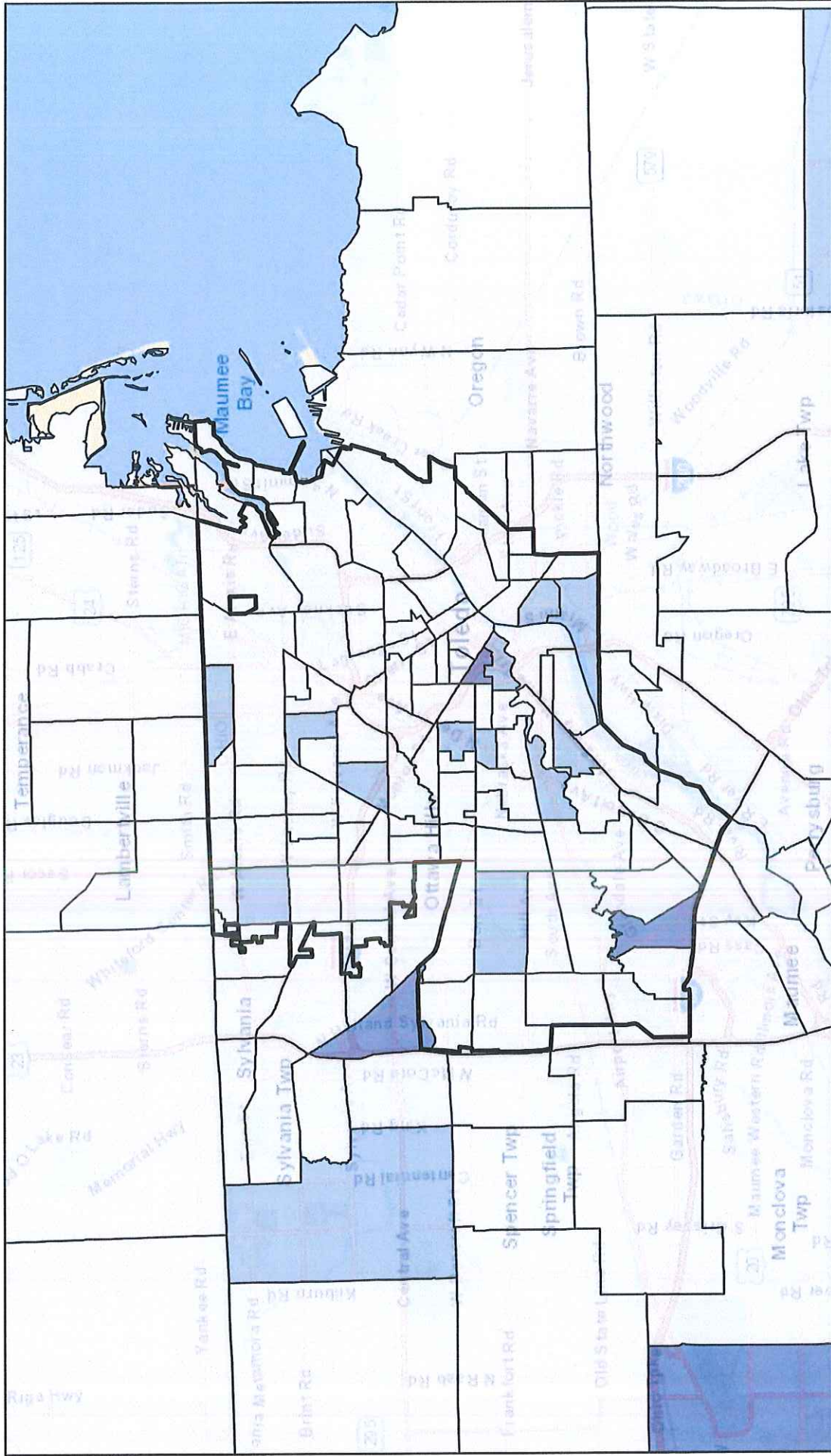
1:220,308

0 1.25 2.5 5 mi

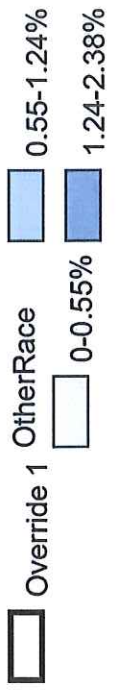
0 2.25 4.5 9 km

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

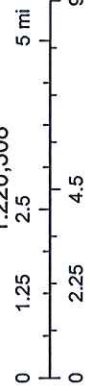
Some Other Race Population in Toledo - Concentration of Minorities per Census Tract -



April 29, 2021

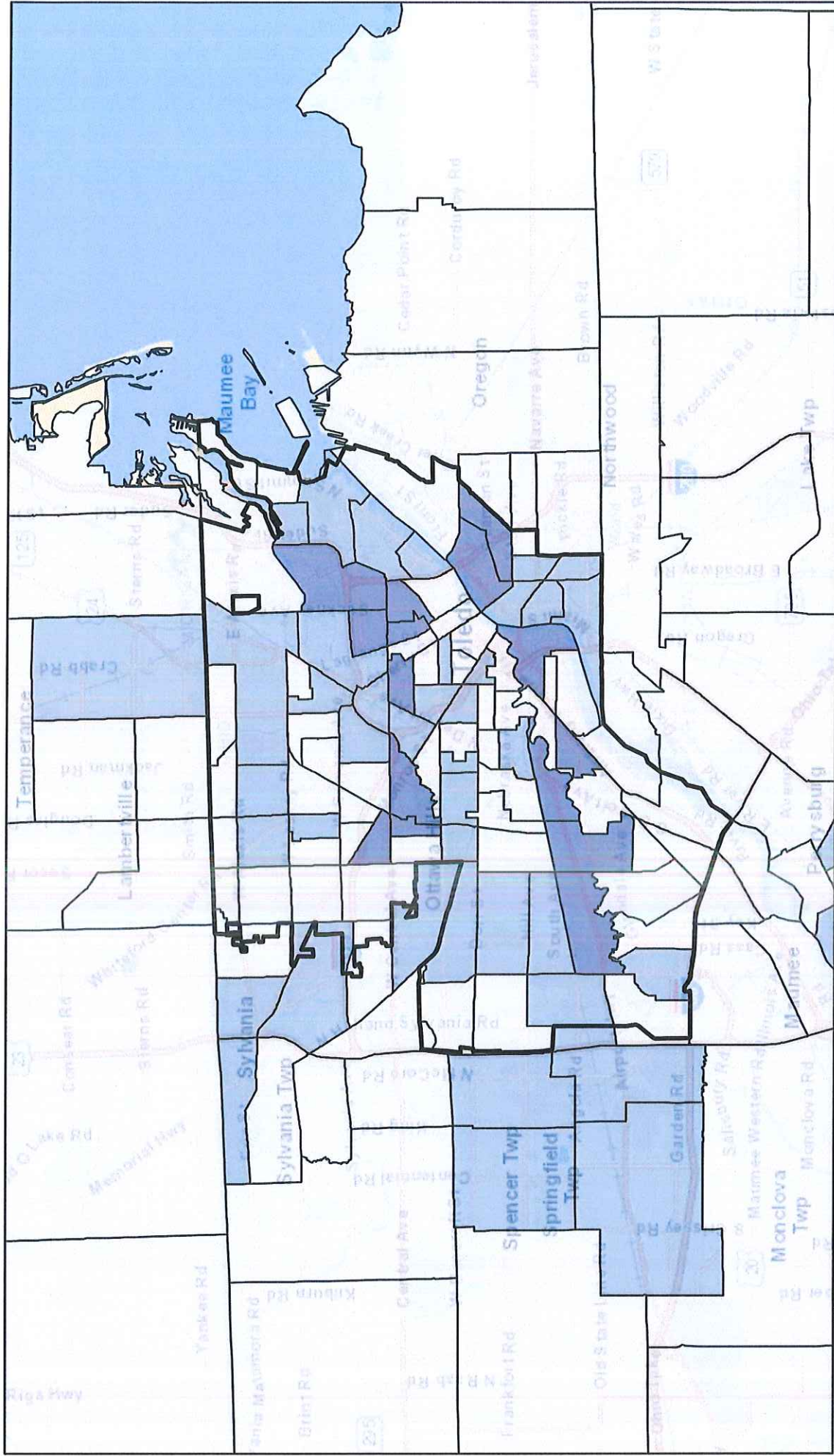


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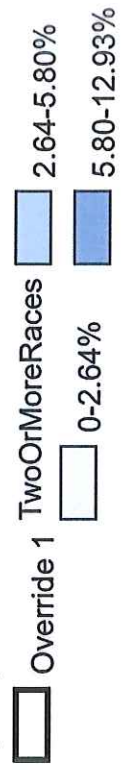


Sources: Esri, HERE, Garmin, USGS, Inlemap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

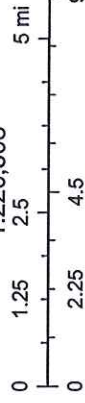
Two or More Races Population in Toledo - Concentration of Minorities per Census Tract -



April 29, 2021



1:220,308



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



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



Homelessness Indicator Snapshots

FY 21 SNAPSHOTS

Indicator (3Q2021)	Emergency	Transitional	Permanent Supportive	Rapid
	Shelter	Housing	Housing	Rehousing
Exits to Permanent Housing	82%	100%	100%	50%
Positive or Neutral Reason for Leaving Program	47%	100%	100%	51%
Average Length of Stay in Days	89	173	358	346
PSH Retention	n/a	n/a	100%	n/a
Improvements in Income	5%	0%	0%	0%
Adults Employed at Exit	11%	0%	43%	76%
Households Exiting with Non Cash Benefits	30%	57%	83%	29%

Indicator (4Q2021)	Emergency	Transitional	Permanent Supportive	Rapid
	Shelter	Housing	Housing	Rehousing
Exits to Permanent Housing	34%	100%	50%	95%
Positive or Neutral Reason for Leaving Program	35%	100%	50%	72%
Average Length of Stay in Days	113	36	2019	469
PSH Retention	n/a	n/a	100%	n/a
Improvements in Income	3%	0%	97%	0%
Adults Employed at Exit	13%	0%	13%	<1%
Households Exiting with Non Cash Benefits	31%	67%	47%	28%

Indicator (1Q2022)	Emergency	Transitional	Permanent Supportive	Rapid
	Shelter	Housing	Housing	Rehousing
Exits to Permanent Housing	59%	78%	58%	100%
Positive or Neutral Reason for Leaving Program	59%	78%	71%	100%
Average Length of Stay in Days	142	129	1196	314
PSH Retention	n/a	n/a	100%	n/a
Improvements in Income	1%	0%	87%	0%
Adults Employed at Exit	13%	0%	13%	67%
Households Exiting with Non Cash Benefits	39%	33%	53%	67%

Indicator (2Q2022)	Emergency	Transitional	Permanent Supportive	Rapid
	Shelter	Housing	Housing	Rehousing
Exits to Permanent Housing	36%	67%	48%	100%
Positive or Neutral Reason for Leaving Program	37%	67%	62%	100%
Average Length of Stay in Days	214	18	1117	358
PSH Retention	n/a	n/a	99%	n/a
Improvements in Income	0%	0%	100%	0%
Adults Employed at Exit	11%	0%	12%	50%
Households Exiting with Non Cash Benefits	29%	50%	45%	83%



ESG DRAFT CAPER



DRAFT

HUD ESG CAPER

Grant: **ESG: Toledo - OH - Report** Type: **CAPER**

Report Date Range

7/1/2021 to 6/30/2022

Contact Information

First Name Bonita
Middle Name Dawn
Last Name Bonds
Suffix
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Phone Number (419)245-1401
Extension
Fax Number (419)245-1192

Project types carried out during the program year

Components	Projects	Total Persons Reported	Total Households Reported
Emergency Shelter	4	1285	584
Day Shelter	0	0	0
Transitional Housing	0	0	0
Total Emergency Shelter Component	4	1285	584
Total Street Outreach	0	0	0
Total PH - Rapid Re-Housing	0	0	0
Total Homelessness Prevention	1	49	42

DRAFT**Grant Information****Emergency Shelter Rehab/Conversion**

Did you create additional shelter beds/units through an ESG-funded rehab project

No

Did you create additional shelter beds/units through an ESG-funded conversion project

No

Data Participation Information

Are there any funded projects, except HMIS or Admin, which are not listed on the Project Links and Uploads form? This includes projects in the HMIS and from VSP

No

How many of the VSP projects have a HUD approved plan and are using a template rather than a comparable database report uploaded?

0

Project Outcomes

Project outcomes are required for all CAPERS where the program year start date is 1-1-2021 or later. This form replaces the narrative in CR-70 of the eCon Planning Suite.

From the Action Plan that covered ESG for this reporting period copy and paste or retype the information in Question 5 on screen AP-90: "Describe performance standards for evaluating ESG."

The local Continuum of Care established revised performance standards for funded agencies in November 2016. Not all program types have recommended targets for each performance indicator. Some program types have recommended targets for special populations instead of, or in addition to, overall targets. This is in concert with HUD's Interim Rule, which calls for "performance targets appropriate for population and program type." Targets are segmented according to the National Alliance to End Homelessness Rapid Re-Housing Triage Tool, which rates three areas of barriers to gaining and obtaining housing. Recommended targets are listed by program type for each indicator in the Key Performance Indicator list.

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

In the Integrated Disbursement and Information System (IDIS), HUD's reporting computerized system, the performance objectives and outcomes are already predetermined based on the activity type/category. Each category has subcategories in IDIS.

The City of Toledo (COT) is not funding street outreach activities through its ESG funds. Please refer to AP-65 of this Action Plan for existing outreach and assessment activities in the COT.

Based on the information from the Action Plan response previously provided to HUD:

1. Briefly describe how you met the performance standards identified in A-90 this program year. If they are not measurable as written type in N/A as the answer.

Waiting for TLCHB response.

2. Briefly describe what you did not meet and why. If they are not measurable as written type in N/A as the answer.

Waiting for TLCHB response.

OR

3. If your standards were not written as measurable, provide a sample of what you will change them to in the future? If they were measurable and you answered above type in N/A as the answer.

Waiting for TLCHB response.

Financial Information

ESG Information from IDIS

As of 8/19/2022

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FY	Grant Number	Current Authorized Amount	Funds Committed By Recipient	Funds Drawn	Balance Remaining	Obligation Date	Expenditure Deadline
2021	E21MC390021	\$645,616.00	\$640,116.00	\$327,490.73	\$318,125.27	8/13/2021	8/13/2023
2020	E20MC390021	\$652,282.00	\$652,282.00	\$652,282.00	\$0	8/25/2020	8/25/2022
2019	E19MC390021	\$632,768.00	\$621,862.36	\$621,862.36	\$10,905.64	7/31/2019	7/31/2021
2018	E18MC390021	\$606,390.00	\$587,063.34	\$581,231.80	\$25,158.20	8/22/2018	8/22/2020
2017	E17MC390021	\$973,055.00	\$913,729.98	\$913,729.98	\$59,325.02	9/22/2017	9/22/2019
2016	E16MC390021	\$610,458.00	\$610,458.00	\$610,458.00	\$0	7/22/2016	7/22/2018
2015	E15MC390021	\$612,158.07	\$612,158.07	\$612,158.07	\$0	7/22/2015	7/22/2017
Total		\$5,801,075.07	\$5,706,017.75	\$5,387,560.94	\$413,514.13		

Expenditures	2021 Yes	2020 Yes	2019 Yes	2018 Yes	2017 Yes	2016 Yes
FY2021 Annual ESG Funds for						
FY2020 Annual ESG Funds for						
FY2019 Annual ESG Funds for						
FY2018 Annual ESG Funds for						
FY2017 Annual ESG Funds for						
FY2016 Annual ESG Fu						

Homelessness Prevention	Non-COVID	COVID	Non-COVID	COVID	Non-COVID	COVID	Non-COVID
Rental Assistance							
Relocation and Stabilization							
Services - Financial Assistance							
Relocation and Stabilization							
Services - Services							
Hazard Pay (unique activity)					221,761.22		173,920.00
Landlord Incentives (unique activity)					259,215.77		144,918.00
Volunteer Incentives (unique activity)							
Training (unique activity)							
Homeless Prevention Expenses	0.00	0.00	0.00	0.00	480,976.99	0.00	318,838.00
FY2021 Annual ESG Funds for							
FY2020 Annual ESG Funds for							
FY2019 Annual ESG Funds for							
FY2018 Annual ESG Funds for							
FY2017 Annual ESG Funds for							
FY2016 Annual ESG Fu							

Rapid Re-Housing	Non-COVID	COVID	Non-COVID	COVID	Non-COVID	COVID
Rental Assistance						

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Relocation and Stabilization Services - Financial Assistance	202,844.04	51,929.56	124,036.36	41,721.00			
Relocation and Stabilization Services - Services Hazard Pay (unique activity)	115,455.46	223,535.56	219,375.00	246,747.90			
Landlord Incentives (unique activity)							
Volunteer Incentives (unique activity)							
Training (unique activity)							
RRH Expenses	318,299.50	275,465.12	343,411.36	288,468.90	0.00	0.00	0.00
	FY2021 Annual ESG Funds for	FY2020 Annual ESG Funds for	FY2019 Annual ESG Funds for	FY2018 Annual ESG Funds for	FY2017 Annual ESG Funds for	FY2016 Annual ESG Fu	
Emergency Shelter	Non-COVID	Non-COVID	Non-COVID	Non-COVID	Non-COVID	Non-COVID	
Essential Services Operations	217,020.28	289,065.88	195,100.00	212,139.90	318,061.05	213,050.00	
Renovation Major Rehab Conversion Hazard Pay (unique activity)							
Volunteer Incentives (unique activity)							
Training (unique activity)							
Emergency Shelter Expenses	217,020.28	289,065.88	195,100.00	212,139.90	318,061.05	213,050.00	
	FY2021 Annual ESG Funds for	FY2020 Annual ESG Funds for	FY2019 Annual ESG Funds for	FY2018 Annual ESG Funds for	FY2017 Annual ESG Funds for	FY2016 Annual ESG Fu	
Temporary Emergency Shelter	Non-COVID	Non-COVID	Non-COVID	Non-COVID	Non-COVID	Non-COVID	
Essential Services Operations							
Leasing existing or temporary structures Acquisition Renovation Hazard Pay (unique activity)							

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	FY2021 Annual ESG Funds for	FY2020 Annual ESG Funds for	FY2019 Annual ESG Funds for	FY2018 Annual ESG Funds for	FY2017 Annual ESG Funds for	FY2016 Annual ESG Fu
	Non-COVID	Non-COVID	Non-COVID	Non-COVID	Non-COVID	Non-COVID
	COVID	COVID	COVID	COVID	COVID	COVID
Volunteer Incentives (unique activity)	0.00	0.00	0.00	0.00	0.00	0.00
Training (unique activity)						
Other Shelter Costs						
Temporary Emergency Shelter Expenses	0.00	0.00	0.00	0.00	0.00	0.00
Street Outreach						
Essential Services						
Hazard Pay (unique activity)						
Volunteer Incentives (unique activity)						
Training (unique activity)						
Handwashing Stations/Portable Bathrooms (unique activity)						
Street Outreach Expenses	0.00	0.00	0.00	0.00	0.00	0.00
Other ESG Expenditures						
Cell Phones - for persons in CoC/YHDP funded projects (unique activity)						
Coordinated Entry COVID Enhancements (unique activity)						
Training (unique activity)						
Vaccine Incentives (unique activity)						
HMIS	40,534.00	40,824.00	44,597.00	41,712.81	37,582.00	40,988.00
Administration	48,421.20	42,527.00	36,026.00	72,979.13	40,988.00	78,570.00
Other Expenses	48,421.20	83,351.00	80,623.00	114,691.94	0.00	0.00
FY2021 Annual ESG Funds for	Non-COVID	COVID	Non-COVID	COVID	Non-COVID	COVID
	583,740.98	652,282.00	621,862.36	581,231.80	913,729.98	610,458.00
Total Expenditures						

Match

DRAFT

Total ESG
expenditures
plus match

583,740.98	652,282.00	621,862.36	581,231.80	913,729.98	610,458.00
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Total expenditures plus match for all years

4,575,463.19