

FY2023 City of Toledo – Department of Neighborhoods ESG/CDBG Certifications and Policy Addendum

The City of Toledo – Department of Housing and Community Development is issuing this “Competition Certifications and Policy Addendum” that is a required certification that must be submitted with ALL project review applications. This document addresses the FY2023 CoC policy, items related to project application scoring for Housing First and Low Barrier Housing, and assurance from applicants that all required certifications must be current and submitted in Zoom Grants.

The certifications below must be made by a member of the organization who has been duly authorized to make such commitments. This addendum must be received by the City of Toledo – Department of Housing and Community Development from ALL project applicants no later than February 10th, 2023 by 4:45pm for the 2023 Emergency Solutions Grant (ESG)/Community Development Block Grant (CDBG) Competition in order for an application to be considered complete. It must be delivered electronically via Zoom Grants with the complete application package to The City of Toledo – Department of Housing and Community Development.

Bed Prioritization for Chronically Homeless Policy

The Toledo/Lucas County CoC is prioritizing homeless individuals and families experiencing chronic homelessness consistent with *Notice CPD 16-011: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status*. Chronically homeless individuals and families should be given priority for permanent supportive housing beds not currently dedicated to this population as vacancies become available through turnover. Permanent supportive housing renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance use disorder) must continue to serve those subpopulations, as required in the current grant agreement. However, chronically homeless individuals and families within the specified subpopulation should be prioritized for entry. The most current notice can be found at: <https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/>.

I certify that I am aware of these policy requirements for Permanent Housing (RRH or PSH) projects funded through the City of Toledo – Department of Neighborhoods ESG/CDBG Competition. (Please initial) _____ JH _____

Low Barriers to Entry

Low barrier housing refers to allowing project entry to participants without any or many barriers or restrictions and prioritizes rapid placement and stabilization in permanent housing. This includes low or no income, current or past substance use, criminal records—with the exceptions of restrictions imposed by federal, state or local law or ordinance (e.g., restrictions on serving people who are listed on sex offender registries), and a history of domestic violence. Although not yet required, the Toledo/Lucas County CoC, in line with HUD, encourages projects to adopt this service model. Please note that renewal applicants must meet, or improve, the level committed in previous competitions.

Select applicable response:

I certify that my agency will operate this project funded through the City of Toledo – Department of Neighborhoods ESG/CDBG Competition using a Low Barrier approach. (Please initial) _____ JH _____

No, my agency will not operate this project funded through the City of Toledo – Department of Neighborhoods ESG/CDBG Competition using a Low Barrier approach. (Please initial) _____

Housing First

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing without any preconditions such as sobriety or a minimum income threshold. Once stabilized in housing, any service participation requirements should not result in client termination from the project before a good faith effort is made to identify alternative solutions. The City of Toledo – Department of Neighborhoods, in line with HUD, prioritizes adoption of this service model for all projects. Please note, renewal applicants must meet, or improve, the level committed in previous competitions.

Commented [LS1]: 2022 Annual NOFO: CoCs must demonstrate at least 75 percent of all project applications that include housing activities (e.g., permanent housing, safe haven) submitted under this NOFO are using the Housing First approach by providing low barrier projects that do not have service participation requirements or preconditions to entry and prioritize rapid placement and stabilization in permanent housing.

Select applicable response:

- I certify that my agency will operate this project funded through the City of Toledo – Department of Neighborhoods ESG/CDBG Competition using a Housing First model. (Please initial) ___JH___
- No, my agency will not operate this project funded through the City of Toledo – Department of Neighborhoods ESG/CDBG Competition using a Housing First model. (Please initial) _____

Toledo/Lucas County CoC Written Standards Policy (Required)

Each CoC is required by HUD to establish and follow written standards for recipients and subrecipients receiving assistance through City of Toledo – Department of Neighborhoods ESG/CDBG funds. At a minimum, these written standards must include policies and procedures for evaluating individuals’ and families’ eligibility for assistance through the CoC Program, determining and prioritizing eligible individuals and families for transitional housing, rapid re-housing, and permanent supportive housing assistance, and determining the percentage and amount of rent program participants must pay while receiving rapid re-housing assistance.

- I certify that my agency will ensure that policies and procedures of each COT – Department of Housing and Community Development ESG/CDBG funded project will be maintained to meet the requirements set forth in the *Toledo/Lucas County Continuum of Care Written Standards* upon approval and publication of such standards, including updates that may be published from time to time. These written standards will furthermore be in practice for each project subject to this certification. (Please initial) ___JH___

Toledo/Lucas County CoC Violence Against Women Act (VAWA) Policy (Required)

The 2013 reauthorization (VAWA 2013) expands housing protections to HUD programs beyond HUD’s public housing program and HUD’s tenant-based and project-based Section 8 programs (collectively, the Section 8 programs) that were covered by the [Reauthorization of VAWA in 2005 \(VAWA 2005\)](#). Additionally, the 2013 law provides enhanced protections and options for victims of domestic violence, dating violence, sexual assault, and stalking.

On November 16, 2016, HUD published its VAWA final rule (81 FR 80798), which provides various protections to victims of domestic violence, dating violence, sexual assault, and stalking under the CoC Program and other HUD programs. The core statutory protections of VAWA also prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. Under the HUD Final Rule, the Toledo/Lucas County Continuum of Care written standards include provisions for protection of those aforementioned protected classes.

The grants to be awarded under this ESG/CDBG competition will be required to comply with the VAWA rule as provided in 24 CFR 578.99(j). All City of Toledo – Department of Neighborhoods ESG/CDBG -funded projects must follow the *Toledo/Lucas County CoC Violence Against Women Act (VAWA) Policies and Procedures* and be fully compliant.

Select applicable response:

- I certify that my agency will update our policies and procedures and ensure compliance with the *Toledo/Lucas County CoC Violence Against Women Act (VAWA) Policies and Procedures*. (Please initial) ___JH___

Application Submission Assurances (Required)

In addition to the requirement of applicants to ensure all required certifications are current and submitted in the Zoom Grants as required:

- All project applicants must ensure their organization has a Code of Conduct that complies with the requirements of 2 CFR part 200 and is on file with HUD at https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants. If the organization’s Code of Conduct does not appear on HUD’s website, the project must attach its Code of Conduct that includes all required information to its Project Applicant Profile in Zoom Grants.
- I certify that I am aware of these ESG/CDBG requirements, and that my agency will provide project information to related Consolidated Planning jurisdictions as required. (Please initial) JH
- My agency is a Sub-Recipient and not the entity using *Zoom Grants*, however, I am aware that I need to provide project information to related Consolidated Planning jurisdictions as required. (Please initial) _____

Signature of Authorized Representative	
<input checked="" type="checkbox"/> "X" indicates electronic signature submitted	
Print Name	Youssef (Joe) Habib
Title	President/CEO
Agency and Project Name(s)	St. Paul’s Community Center – Emergency Shelter
Date	2/8/2023