



July 1, 2020 - June 30, 2021 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 Neighborhoods (DON), 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 were 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) 2020 for the COT, encompassing July 1, 2020 through June 30, 2021. This report provides information for 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 2020-2021, the COT partnered with many organizations to address and accomplish the priorities of the Consolidated Plan. Additionally, other local, state and federal programs/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 efforts continue 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.

To assist grantees during the COVID-19 emergency HUD provided administrative relief to grantees. On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, was signed, providing \$5 billion for Community Development Block Grant (CDBG) to rapidly respond to COVID-19 and the economic and housing impacts caused by this unprecedented crisis. The Act also provided \$4 billion for Emergency Solutions Grant (ESG) to prevent, prepare for, and respond to the Coronavirus Pandemic (COVID-19) among individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19.

CR-05 - Goals and Outcomes

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

91.520(a)

The city of Toledo 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 2020 (46th) PY, encompassing July 1, 2020 through June 30, 2021, represents the 1st 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 challenges endured by the City as a result of the 2020 Pandemic, the City was able to demonstrate progress in the 2020-2021 Annual Action Plan and 2020-2024 Consolidated Plan projects.

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 Consolidated Plan.

The Department 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) or Neighborhood Stabilization Program (NSP) funds homeownership continues to be addressed. The department assisted **47** new homeowners, **46** through HOME and **1** through NSP, by placing them in housing units. In addition, the homeowners were prepared for future homeownership by completing an eight-hour, HUD-mandated homeownership training session conducted by qualified HUD-approved counseling agencies.

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 **3,066**.

Additionally, economic development activities included in the goals assist businesses with technical assistance and the creation of jobs. To that end, **40** businesses were assisted and **7** jobs were created. Some of the technical assistance provided was Enterprise Development Loan (EDL) applications, referrals to chamber of commerce and receiving COT incentives.

The City also assisted businesses through a Business Incentive Grant (BIG) program. The Department of Economic Development through its BIG program for the period from July 2020 through June 2021 has helped a number of businesses with the assistance of CDBG funds. The Department provided both technical assistance as well as financial assistance.

During this time period the forms of assistance are as follows:

- Technical Assistance - **22** small businesses
- Applications received - **14** (in various stages of the process)
- Approved - **\$155,858** in approved funding

The type of work that was to be done or is in the process of being done ranges from roof replacement, windows, masonry, tuck pointing, painting, storefront reconstruction, and awnings. The most popular use has been new windows and tuck pointing.

The Toledo Lucas County ERA Program is a joint effort between the city of Toledo and Lucas County to provide much needed rental assistance to LMI households in their jurisdictions. Combined, there was over \$12 million dollars awarded to the City and County. The program is funded by the U. S. Department of Treasury.

The Toledo-Lucas County ERA Program has distributed nearly \$1.2 million in rental and utility expenses for **254** LMI households in Toledo and Lucas County. There are currently over 1,404 completed applications in various stages of review. The City has hosted approximately 50 community outreach events to provide technical assistance to applicants navigating the online application portal.

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. A new Lead Workforce Development training program is being drafted to provide subsized training and licensure to local lead inspectors, abatement contractors/workers, and Renovation, Repair, and Painting (RRP) trainees.

Additionally, the Early Bird Match Grant was implemented to provide rental owners assistance with compliance costs under the new 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.

The DON continues to work with the Toledo Lucas County Homelessness Board (TLCHB) in its continued efforts toward the prevention and elimination of homelessness in the city of Toledo.

The COT and The Fair Housing Center (TFHC) continue to work with community partners on the implementation of the Five-Year FHAP. The FHAP provides updates on the action steps that are undertaken to address barriers to housing choice identified in the 2020-2025 Analysis of Impediments to Fair Housing Choice. (See the annual update on the FHAP for more detailed information in the attachments)

The Code Enforcement Division continued an intense, concentrated focus on the development and implementation of the geospatial data management system, CityWorks: Permits, Land and Licensing (PLL), which transitioned from a development environment to a live environment at the end of Q2 2021. The CityWorks: PLL system is linked to ArcGIS and ESRI products, which interfaces with other various public access databases to bring data in for visual mapping in the CityWorks: PLL database management system, which assists in deploying our field personnel in an efficient manner to approach the dynamics of community blight.

The Division also expanded the amnesty & recycling program from twelve (12) events to fifteen (15) in PY 2020-2021, which saw a record number of participants totaling more than 4,500+ people. Vendors were made available for participants to bring tires, latex and oil-based paints, electronic waste, general debris, household hazardous waste, textiles, and documents for destruction, of which kept more than **313.63** tons of materials out of the landfill.

With the expansion of the recycling program, in PY 2020, the Division developed a partnership with the electronic waste vendor, AIM Eycling, to accept CRT monitors and televisions for appropriate recycling and disposal. Televisions are often the item found littered through our neighborhoods, along alleyways, on vacant lots, and sitting curbside, and have created one of the single largest blight items the Division faces. CRT monitors and tube televisions contain hazardous metals, which is only acceptable below a specific EPA mandated threshold to be disposed of at our city-owned landfill. With a strong effort to stay below that threshold, and to have these monitors and televisions removed as blight from our neighborhoods, AIM Eycling has been able to collect record numbers of these items for appropriate disposal. This has the net effect of reducing blight within the city.

The Department continues to utilize the online application, electronic accomplishments and request for funds submission for CDBG and ESG sub-recipients through ZoomGrants. In 2020 (46th) PY, HOME sub-recipients were added. In addition, the Department 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 been a tremendous 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 contain comparisons of actual accomplishments vs. the goals of the Five-Year Consolidated and one-year annual action plans. The following table represents **Preliminary Data** related to accomplishments for the 2020 (46th) 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			2020 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: \$0 HOME: \$0 ESG: \$0	Other	Other	0	0	0%	0	0	0%
Code Enforcement & Nuisance Abatement incl. Rental	Non-Housing Community Development	CDBG: \$1,400,264	Housing Code Enforcement/ Foreclosed Property Care	Household Housing Unit	200,000	47,382	24%	40,000	47,382	118%
Coordinated Access for Homelessness	Homeless Non-Housing Community Development	CDBG: \$32,500 ESG: \$652,282 Competitive McKinney-Vento Homeless Assistance Act: \$400,000 Continuum of Care: \$3,955,340	Other	Other	1	1	100%	1	1	100%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2020 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Demolition/Clearance in Citywide Low-Income Areas	Non-Housing Community Development	CDBG: \$500,000	Buildings Demolished	Buildings	40	0	0%	40	0	0%
Establish and Maintain Community Gardens	Non-Housing Community Development	CDBG: \$163,389	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,880	3,036	19%	3,176	3,036	96%
Fair Housing Planning & Services	Non-Housing Community Development	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	17,535	2,337	13%	3,507	2,337	67%
HOME Administration	Affordable Housing Public Housing Homeless	HOME: \$172,896	Other	Other	1	1	100%	1	1	100%
Home Buyer Down Payment/Closing Costs Assistance	Affordable Housing	HOME: \$600,000	Direct Financial Assistance to Homebuyers	Households Assisted	122	46	38%	30	46	153%
HOME CHDO Set-aside	Affordable Housing	HOME: \$535,996	Homeowner Housing Added	Household Housing Unit	21	1	5%	5	1	20%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2020 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Home Repairs for Seniors and the Disabled	Affordable Housing Non-Homeless Special Needs	CDBG: \$565,448	Homeowner Housing Rehabilitated	Household Housing Unit	540	112	21%	128	112	88%
HOME: Home Buyer Development	Affordable Housing	HOME: \$846,670	Homeowner Housing Added	Household Housing Unit	5	9	180%	5	9	180%
Housing Rehabilitation Administration - CDBG	Affordable Housing	CDBG: \$1,031,477	Other	Other	1	1	100%	1	1	100%
Housing Repairs and Rehabilitation	Affordable Housing	CDBG: \$1,157,819 HOME: \$2,493,633	Homeowner Housing Rehabilitated	Household Housing Unit	1,363	187	14%	287	187	65%
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: \$87,025	Other	Other	1	1	100%	1	1	100%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2020 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Improvements to parks and community facilities	Non-Housing Community Development	CDBG: \$500,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	60,000	0	0%	11,000	0	0%
			Other	Other	5	0	0%	5	0	0%
Improvements to public infrastructure for LMI	Non-Housing Community Development	CDBG: \$50,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	6	5%	25	6	24%
Increase in transitional housing	Affordable Housing Homeless	CDBG: \$90,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	110	22	20%	22	22	100%
Increase number of emergency shelters	Affordable Housing Homeless	CDBG: \$60,500	Homeless Person Overnight Shelter	Persons Assisted	2,945	415	14%	589	415	70%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2020 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Increase or new public services	Non-Housing Community Development	CDBG: \$799,976	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	169,377	20,802	12%	33,553	20,802	62%
Job Creation/Retention incl. returning citizens	Non-Housing Community Development	CDBG: \$231,994 HOME: \$0 ESG: \$0	Jobs created/retained	Jobs	7	7	100.00%	7	7	100.00%
Large rental housing/low-income housing tax credit	Affordable Housing	CDBG: \$75,000	Rental units rehabilitated	Household Housing Unit	15	1	7%	3	1	33%
Local affordable housing capacity - public services	Affordable Housing	CDBG: \$100,000	Other	Other	8	0	0.00%	8	0	0.00%
Permanent Supportive Housing	Affordable Housing Homeless	CDBG: \$65,855	Housing for Homeless added	Household Housing Unit	810	52	6%	56	52	93%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2020 Program Year		
					Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Planning and Administration - CDBG	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$1,277,011	Other	Other	1	1	100%	1	1	100%
Rapid Re-Housing and Direct Financial Assistance	Affordable Housing Homeless	CDBG: \$49,500 HOME: \$150,000	Tenant-based rental assistance/ Rapid Rehousing	Households Assisted	620	92	15%	140	92	66%
Slum and blight reduction	Non-Housing Community Development	CDBG: \$113,317 Land Bank: \$4,750,000	Housing Code Enforcement/ Foreclosed Property Care	Household Housing Unit	5,750	1,592	28.0%	1,150	1,592	138%
Small rental housing financing and education	Affordable Housing	HOME: \$1,100,000	Rental units rehabilitated	Household Housing Unit	12	5	42%	12	5	42.0%
Supplement Lead Hazard Grants for At Risk Families	Affordable Housing Lead Remediation Rehab	CDBG: \$1,000,000	Homeowner Housing Rehabilitated	Household Housing Unit	150	0	0.00%	50	0	0.00%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Five-Year Consolidated Plan			2020 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: \$600,000	Homeowner Housing Rehabilitated	Household Housing Unit	40	0	0.00%	40	0	0.00%
Targeted Neighborhood Slum and Blight Reduction	Non-Housing Community Development	CDBG: \$900,000	Other	Other	1	0	0.00%	1	0	0.00%
Transportation support	Non-Housing Community Development	CDBG: \$11,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,050	240	23%	210	240	114%

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 **\$7,569,147** in CDBG funds plus **\$233,464** in program income, **\$2,228,558** in HOME and **\$652,282** in ESG for the 2020 (46th) program year. The activities carried out responded to the goals identified in the 2020-2024 Five-Year Consolidated Plan and 2020 Annual Action Plan. The DON 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 identified in the 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 DON. 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 in Table 1 represent accomplishments during the calendar year 2020 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 of the individuals and families assisted in the 2020 (46th) PY. The final data will be included in the final version of this CAPER.

	CDBG	HOME	ESG
White	9,402	32	715
Black or African American	12,102	15	1,321
Asian	46	0	7
American Indian or American Native	266	0	45
Native Hawaiian or Other Pacific Islander	36	0	6
Total	21,852	47	2,094
Hispanic	1,050	0	147
Not Hispanic	20,802	47	1,917

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 and ESG. The data shows that under CDBG **55%** and HOME **32%** are minorities (mostly Black or African American). Additionally, CDBG **5%** and HOME **0%** are Hispanic.

The table above does represent all the racial and ethnic persons or families assisted, below are additional categories also reported in IDIS:

- American Indian/Alaskan Native & White - **12**
- Asian & White - **13**
- Black/African American & White - **87**
- American Indian/Alaskan Native & Black/African American - **3**
- Other Multi-Racial - **1,490**

Of the above categories not reflected in the table **538** or **34%** of the persons or families served was Hispanic. The listed ethnic and racial populations assisted with these funds represent the at-risk population served throughout the neighborhoods.

The ESG racial composition of beneficiaries reported above can be seen in the SAGE report. For the ESG, **189** individuals reported being of multiple races. The data shows that **63%** of those served were African American and **7%** 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 2020-2021 CDBG entitlement award to programs that directly benefitted low- and moderate-income individuals.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

The table below represents *Preliminary Data* related to the amounts expended in the 2020 (46th) 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	\$6,723,183
HOME	public - federal	\$5,898,791	\$926,519
ESG	public - federal	\$652,282	\$633,989
Competitive McKinney-Vento Homeless Assistance Act	public - federal	\$400,000	\$393,000
Continuum of Care	public - federal	\$3,955,340	\$1,390,022
Other - Land Bank	public - local	\$4,750,000	\$3,333,714

Table 3 - Resources Made Available

Narrative

The table above represents the amount of resources available and the *Preliminary* amounts expended in 2020 (46th) PY.

For Continuum of Care (CoC), the CoC partners that receive this funding contract and request draws directly from HUD.

For other, numbers were estimated at the time of the Annual Action Plan with the best information available at the time. The amounts actually expended during the 2020 (46th) PY will be available in the final version of this CAPER.

The city of Toledo also received CARES Act funding to be used to prevent, to prepare for or 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 **\$2,857,301.35** of CDBG-CV and **\$1,064,750.52** 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 **\$310,243.72**. The Ohio Department of Health awarded the Historic South Initiative funds in the amount of **\$150,000** and utilized the DON has a pass-thru to this agency. The entire amount was expended this year.

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; In April 2021 HUD Healthy Home & Weatherization - **\$1 million** grant for a pilot program that will bridge the Lead Hazard Control and Healthy Homes grant administered by the DON and the Weatherization Assistance Program (WAP) administered by NeighborWorks Toledo Region; and working in partnership with Toledo Lucas County Health District, a **\$1.2 million** grant from the BP Husky Settlement will be utilized in conjunction with Lead Hazard Control and Healthy Homes grant.

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 (proposed NRSA)
Junction/Englewood	6%	1%	Targeted Investment Area (proposed NRSA)
Old South End	1%	1%	Targeted Investment 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 2020 (46th) 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 DON 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 DON 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.

NSP funds were concentrated in those areas with high rates of foreclosures. During the 2020 (46th) PY only one (1) NSP home was sold. The property was located in CT 66.

The COT, in adherence to HUD regulations, allocates at least 70% of its 2020-2021 CDBG entitlement award to programs that directly benefit low- and moderate-income individuals.

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 DON'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, 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.

The tables below represent **Preliminary Data** in the 2020 (46th) PY. The final data will be included in the final version of this CAPER.

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

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 begin-ning 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 \$
35,080	309,012	263,326	0	80,765

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	314,622	0	0	28,936	0	285,686
Number	10	0	0	1	0	9
Sub-Contracts						
Number	19	0	0	5	0	14
Dollar Amount	94,957	0	0	8,375	0	86,582
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	314,622	0	314,622			
Number	10	0	10			
Sub-Contracts						
Number	19	0	19			
Dollar Amount	94,957	0	94,957			

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	1	0	0	1	0	0
Dollar Amount	4,915	0	0	4,915	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 2020 (46th) 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	238	167
Number of Non-Homeless households to be provided affordable housing units	492	58
Number of Special-Needs households to be provided affordable housing units	128	3
Total	858	228

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	140	151
Number of households supported through The Production of New Units	15	4
Number of households supported through Rehab of Existing Units	552	15
Number of households supported through Acquisition of Existing Units	33	58
Total	740	228

Table 12 – Number of Households Supported

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

A significant decline in home remodeling contractors over the past few years has significantly contributed to the reduction in the number of home units receiving rehabilitation services. The City of Toledo, Department of Neighborhoods (DON) has offered incentives such as bundling of rehabilitation services. The bundling idea did not take-hold. The DON is also competing with other entities such as the local Housing Authority and non-profit organizations that utilize the same short list of rehabilitation contractors. There is also a decline and delivery delay of building supplies, such as lumber, windows, etc. The aforementioned has significantly contributed to a slow down or low productivity in the number of households receiving support for rehabilitation services.

The region continues to have low affordable housing stock. This results in an underabundance of affordable rental units for individuals receiving subsidy and increases the wait time to be housed or rehoused quickly. The limited housing stock creates a bottleneck that puts additional pressure on already stretched supportive services. There is insufficient funding for case management, housing navigation, and other supportive services which impacts the efficiency and effectiveness of system-wide service delivery.

Discuss how these outcomes will impact future annual action plans.

Outcomes continue to be evaluated and adjusted. Additionally, in the case that an outcome was not met, that outcome is then evaluated against past accomplishments. The City continues to use proactive measures to ensure success for the five-year period.

The region continues to have low affordable housing stock. Rapid Re-Housing programs are being negatively impacted by lack of funding for case management services while providing funding for Direct Financial Assistance.

The DON will need to re-evaluate its support services goals. Altering its goals, based on the past few years of service support accomplishments, may be helpful.

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.

The table below represents *Preliminary Data* on the number of households served in the 2020 (46th) PY. The final data will be included in the final version of this CAPER.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	141	16
Low-income	109	32
Moderate-income	17	36
Total	267	84

Table 13 - Number of Households Served

Narrative Information

The DON is currently partnering with two local non-profit organizations to carry out housing support services. The primary goal is to increase service productivity.

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, he or she 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 in the area of youth homelessness. To address the 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. 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 Continuum of Care (CoC) have collaborated on a number of rapid resolution outreach efforts designed to mitigate harm to those experiencing homelessness or at risk. In September 2020, the CoC coordinated with the COT to engage individuals living at an encampment within the City of Toledo. The owner of the private property wished to take measures to secure the perimeter, which would displace those individuals living in the encampment. The CoC convened a team of partners to work with all affected individuals to rapidly address their displacement and to offer all supportive services available. In another example, the CoC coordinated partners and engaged residents at a mobile home park within the City of Toledo. The mobile home park faced imminent shut down and the CoC effectively supported all residents that required relocation assistance.

Addressing the emergency shelter and transitional housing needs of homeless persons

Through ESG and CDBG, the COT supports four emergency shelters, three transitional housing projects, and the centralized entry process within Toledo. The local CoC utilizes the United Way of Greater Toledo 2-1-1 who subcontracts with Gryphon Place/2-1-1 (but whose staff are located in Toledo) to run the CoC's Coordinated Access (CA) process, diverting persons/families experiencing a housing crisis from becoming homeless in the first place while ensuring shelter space and limited resources are used to serve those most in need. 2-1-1 provides ease of access to all emergency housing services for those who are experiencing a housing crisis. When individuals contact 2-1-1 specialists and the specialist determines that a housing crisis is occurring, they refer the individual or family to the CA agents. CA staff members respond to referrals within 24 business hours for unstable situations and 48 business hours for stable situations. CA staff attempt diversion, prevention activities and prioritized bed utilization. United Way currently uses a modified VI-SPDAT (Service Prioritization Decision Assistance Tool) administered by the CA agents to prioritize bed assignments. When emergency shelter beds are not available, 2-1-1 utilizes ESG and other funds to shelter families with young children in hotel/motel rooms until emergency shelter beds or permanent housing units become available. For unsheltered singles and other households waiting for shelter beds, CA agents will offer other stabilization services, such as gospel mission shelters that are not participating in CE. Currently, 2-1-1 continues to document the growing number of single women who have experienced a housing crisis for which there were no emergency shelter beds among the Continuum partners.

There are three specialized transitional shelters, each serving unique subpopulation who are experiencing homelessness. Two transitional shelters provide a shelter, food and more intensive services for women experiencing substance abuse issues who express a need for longer term shelter with more intensive services than is provided by emergency shelters due to very high barriers. One of these transitional housing project works with women with children or those working on family reunification and the other for single women. In addition, another transitional housing project serves women with children who are fleeing domestic violence or the threat of domestic violence. Women chose these projects for longer term temporary housing and more intensive services, which are made necessary by their circumstances, to stabilize their and their children's lives in order to increase the probability to maintain permanent housing after leaving these projects.

In the midst of the COVID-19 response, the CoC led a collaborative grant that assisted with COVID-19 related expenditures such as transportation, PPE, sanitizing/cleaning, and other increased costs associated with the pandemic. The CoC coordinated closely with all emergency shelters and transitional shelters to secure PPE allocations from the Lucas County EOC Donation Center. TLCHB assisted in opening an Isolation and Quarantine Site for individuals experiencing homelessness in need of isolation or quarantining. This included operating a fully functional hotel, intake with local area hospitals, transportation services, food services, staffing from TLCHB and the local Health Department, regular health assessments, clothing services, and other wrap around supports. This site was available to the community from April through July. TLCHB assisted in coordinating on site 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). In January 2021, the CoC collaborated to ensure that all emergency shelter and transitional shelter residents had access to the COVID-19 vaccines as soon as possible.

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

In addition to working with the Toledo Lucas County Homelessness Board (TLCHB) and homeless service providers, the COT (through CDBG), funds many non-profit organizations with programs that assist citizens in maintaining their residence and avoiding homelessness. Examples of such programs are: food (soup kitchens), owner-occupied rehab, rental assistance, home repairs for seniors and people with disabilities, foreclosure prevention, and job training and education programs, among others.

The COT, through the Toledo Lucas CoC, maintains active communications with the health and foster care system and with correctional facilities to prevent homelessness when individuals leave those organizations. All organizations agreed to work together to identify and address barriers that may exist and have policies stating that individuals are not to be discharged into a homeless situation. The TLCHB has and continues to educate community stakeholders to contact United Way's 2-1-1 if an individual or household is facing a housing crisis. TLCHB has strengthened its board by adding high ranking members from the Lucas County Sheriff Department (which runs local jail); from two of the largest health care networks; the director of a local psychiatric unit and a local representative of one of the local managed care companies.

In addition, the lead criminal justice agency, local mental health/recovery service, city law enforcement, local emergency service system, jail administration and local CoC have formed a partnership to identify those most frequent cross system users to identify current total public costs, to assist with identifying current location and to assist with discharge planning when these frequent system users leave an institution. For those targeted individuals who left the psychiatric unit in one hospital, they were permanently housed at local privately subsidized housing complexes, with all maintaining their current permanent housing status, no relapses back to psychiatric emergency treatment and fewer uses of public systems.

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. The CoC received funding from Ohio Department of Mental Health Addiction Services (OHioMHAS) for \$75,000 to provide rental assistance and other eligible services to individuals exiting an institution within 180 days. Treatment Accountability for Safer Communities of Northwest Ohio (TASC) is the sub-recipient of this grant and works to coordinate with the Re-Entry Coalition and other partners for referrals.

The DON funded the Criminal Justice Coordinating Council (CJCC) as a sub-recipient with HOME dollars to partially fund a program for individuals discharged from prison who are homeless. The COT continues to maintain an active role in strengthening the CoC with the goal of eliminating homelessness.

There are several obstacles that continue to negatively affect the systems 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; and
- 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.

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 DON worked closely with the TLCHB in its effort towards reducing and ending homelessness. In FY2020, ESG and CDBG funds supported emergency shelters, transitional housing facilities, a permanent supportive housing agency, agencies with rapid re-housing activities and an agency with activities related to coordinated assessment.

In 2019, the CoC Board of Directors (Board) adopted a revamped Code of Regulations which reconstituted the makeup of Board. Under the revised structure, the COT serves as an appointing authority to the Board. This synergy allows for greater cohesiveness around all efforts to reduce or end homelessness. The CoC convenes the Community Advisory Council a meeting of homeless service providers to evaluate the entire continuum with a mission to improve the network and provide better services to the homeless or at-risk of homelessness populations.

The CoC continues to meet with partners regularly and sub-groups evaluate and improve the network. Recent accomplishments include:

- **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. This began in earnest in the fall of 2020 and will continue into 2021. Initial steps included an analysis of the last CASE Strategic Plan (completed in 2008), inquiries into its continued relevance and effect on current system operations, and preliminary discussions on how to revive

and update the intent for future planning. This will be a large endeavor but is necessary to refocus our CoC and equip it to survive and succeed in the years to come.

- **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 as a way 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 built a relationship with Toledo Streets, the local newspaper sold by persons who are or were formally experiencing homelessness, with TLCHB performing housing assessments and referring them for housing placement.

The COT and TLCHB continued to remain committed to its CoC goals and strategies identified in the Consolidated Plan.

The following percentage of persons directly exited into permanent housing:

- **52%** of emergency shelters;
- **62%** transitional housing;
- **76%** permanent supportive housing; and
- **75%** rapid re-housing.

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

- **67%** emergency shelter;
- **84%** transitional housing;
- **74%** permanent supportive housing; and
- **74%** rapid re-housing.

The percentage of adults employed at exit:

- **88%** emergency shelter;
- **12%** transitional housing;
- **21%** permanent supportive housing; and
- **54%** rapid re-housing.

The following percentage of persons exited with non-cash benefits:

- **81%** emergency shelter;
- **87%** transitional housing;
- **67%** permanent supportive housing; and
- **67%** rapid re-housing.

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

- **66** days for emergency shelter;
- **67** days for transitional housing;
- **531** days for permanent supportive housing; and
- **531** days for rapid re-housing.

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

Actions taken to address the needs of public housing

- Prepared for reopening of the Public Housing waiting list by analyzing occupancy monthly to project need for housing including family size, and turnover rate.
- Affordability:
 - Minimized vacancies to maximize availability of affordable units.
 - Updated LMH's Admissions and Continued Occupancy Policy to include a Security Deposit Installment payment option.
 - Implemented online rent payments. Held two live face-book presentations to provide instructions to residents on the process.
- Supply:
 - LMH was awarded 123 Emergency Housing Vouchers under the American Rescue Plan to assist individuals and families who are experiencing homelessness, who are at risk for homelessness; or who are fleeing or attempting to flee, and who were subject to domestic violence, sexual assault, stalking or human trafficking. LMH will partner with our Local Continuum of Care.
 - Continue to publish Request for Proposals to the community for Project Based Vouchers. Awarded Project Based Vouchers to Warren Commons and Park Hotel.
 - Applied for Low Income Housing Tax Credits for the Park Hotel - 43 Apartment Permanent supportive housing development, and Collingwood Green Phase IV - 40 Townhomes.
 - Applied to HUD 202 program for Collingwood Green Phase V - 75 Apartments.
 - LMH's non-profit affiliate Lucas Housing Services Corporation (LHSC) planned and implemented a Mini-Parade of Homes held July 30, 2021 - August 1, 2021.
 - LHSC during the eighteen (18) months period from January 1, 2020 to June 30, 2021, has 23 houses renovated or undergoing renovation Homes, with 17 for the six-month period ending June 30, 2021;
 - LHSC has sold 6 homes for home ownership. LHSC has a goal to sell a total of thirty by December 31, 2021.
 - LHSC partners with Northwest Ohio Homeownership Development Agency (NOHDA) to streamline the Homeownership process and to help prepare individuals and families for the financial responsibility of home ownership.
 - LMH will continue to utilize HUD's Rental Assistance Demonstration Program as a tool to preserve affordable housing. 20 scattered sites are included as a part of a Commitment to Enter into a Housing Assistance Payment Contract (CHAP) for Collingwood Green Phase IV.
 - LMH is working on a ten-year Portfolio Repositioning Strategy that should be completed within the next 60-90 days.
 - LMH was awarded a Choice Neighborhoods Planning Grant to help revitalize and transform the McClinton Nunn Homes and Junction Neighborhood.
 - LMH leveraged additional funds from the City of Toledo and Lucas County for a total planning project of \$765,000.
 - Grant will enable LMH and the City develop a community-driven plan for McClinton Nunn Homes and surrounding area.
 - Key to this revitalization is the redevelopment of a public housing complex into a modern, desirable, and inclusive community of choice.
 - Plan is focused on neighborhoods, people, and housing.
 - Resident and community engagement is a central component of the planning process and key to its success.

- Quality:
 - Continued to improve Low-Income Public Housing Units by upgrading mechanical systems including but not limited to electrical panels, Boiler Replacements, Fire Pumps, upgraded security cameras, and roof repairs and replacements using Capital Funds.
- Accessibility:
 - Continue to provide Elderly only designated properties.
 - Completed 504 upgrades at Richmar Manor.
- Size of Units: Ensure residents are in appropriately sized units
 - LMH has completed its review of occupancy and its portfolio to ensure residents are not either over housed or under housed. Adjustments to appropriate apartment size is underway and should be completed by December 31, 2021.
- Location strategies: Strategies to expand affordable housing opportunities
 - Applied for Mobility Demonstration Vouchers to increase the availability of housing in high opportunity census tracts.
 - Implemented an Online Landlord Portal to improve the communication process and access to needed information with existing Landlords and to attract new Landlords in high opportunity census tracts.
- At-Risk Population:
 - Increased supportive housing vouchers, Emergency Housing Vouchers, and housing stability coordination in response to COVID-19.
 - 20 new vouchers for reentry population was awarded to the Ridge Project.
 - LHSC and Housing Choice Voucher partnered by providing 3 new vouchers for Transition Age Youth (TAY) through “Bridge to Independence and Success Pilot Program”.
 - Increased the number of available Housing First vouchers from 35 to 65.
 - Increased the number of available “Getting to 1” vouchers from 40 to 90.
 - Awarded 123 Emergency Housing Vouchers from the American Rescue Plan.
 - LMH created an internal team for a collaborative effort the “Housing Stability Initiative” to connect residents to rental assistance and prevent evictions as a result of the pandemic.
 - There were over 600 residents with varying amounts of rental delinquency. Since June of 2021 LMH has communicated with nearly 500 residents and submitted 174 applications for rental assistance to help prevent eviction.
 - LMH will continue to work collaboratively on the Housing Stability Initiative to ensure all residents have an opportunity to remain housed.

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

- LMH’s non-profit affiliate Lucas Housing Services Corporation (LHSC) planned and implemented a Mini-Parade of Homes held July 30, 2021 - August 1, 2021.
 - LHSC during the eighteen (18) month period of January 1, 2020 to June 30, 2021, had 23 houses renovated or undergoing renovation, with 17 for the six-month period ending June 30, 2021.
 - LHSC has sold 6 homes for home ownership had has a goal to sell a total of thirty by December 31, 2021.
 - LHSC partners with Northwest Ohio Housing Development Agency to streamline the Homeownership process and to help prepare individuals and families for the financial responsibility of home ownership.

- Thumbs Up 2.0:
 - LMH implemented Thumbs Up 2.0 an exterior beautification project designed not only to improve the exterior appearance of housing apartments but also provide a Resident Engagement tool that will build pride and commitment from our partner residents.
- LMH designed and implemented a consolidated Action and Business Continuity Plan to address the COVID-19 pandemic. This document provided key instruction for staff and communications to the community and residents.
- Future Efforts:
 - Homeownership
 - In the future LHSC and LMH will improve its partnership with the HCV Homeownership program and other community partners to promote homeownership opportunities to LMH Public Housing Residents.
 - LMH's non-profit affiliate will be conducting quarterly or bi-annual information sessions regarding the Homeownership process. These sessions were unable to be held due to the pandemic.
- Resident Engagement and Involvement in Management
 - LMH conducts resident meetings regularly, however due to the pandemic the meetings were postponed. As the pandemic begins to subside LMH will continue the practice of Resident meetings that seek input regarding their issues and concerns related to property management.
 - LMH will expand Thumbs Up 2.0 to improve Resident Involvement

Actions taken to provide assistance to troubled PHAs

Lucas Metropolitan Housing (LMH) is not designated as 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 HUD 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 U. S. 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 2020-2025 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 priorities 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 to not only 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 recently completed an AI to identify the fair housing barriers that will be addressed from 2020-2025. 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 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 2020-2025 Analysis of Impediments to Fair Housing Choice. (Please see the annual update on the FHAP 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 80 percent.

The DON 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 DON Housing Division 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 DON 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 PY2020, the DON continued to conduct Housing Quality Standard (HQS) inspections for TBRA programs, ensuring compliance with 24 CFR 982.401, for 11 units that were performed by licensed Lead Risk Assessors.

In PY2020, the DON was able to make 15 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 PY2020, **47** Down Payment Assistance grants were provided, with **9** lead visual assessments completed.

The HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) posted the FY2017 Lead Based Paint Hazard Control (LBPHC) NOFA on February 8, 2017. The City of Toledo, Department of Neighborhoods (DON) applied for, and received notice of funding to provide financial assistance to property owners to help reduce lead paint hazards in residential units within the City of Toledo.

The DON applied and was awarded \$2.5 million from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) to develop and run a Lead-Based Paint Hazard Control program. The initial three-year period of performance was from 01/02/2018-01/01/2021. A zero cost extension request was submitted and approved in December 2020 extending the performance period until 01/02/2022.

During PY2020, 11 eligible units enrolled into the FY2017 OLHCHH grant by June 30, 2021 for a grant total of 193 along with 18 additional units having received a comprehensive Lead Inspection/Risk assessment for a grant total of 188 (meeting the grant benchmark). Unit clearances were achieved for **36** additional units (**10** owner-occupied/**26** rental) in PY 2020 for a grant total of 81.

¹Criterion 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 potential through education, income stability, and healthy lives.

The DON 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 DON participates in those partnerships.

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

The DON 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 partnered with Northwest Ohio Housing Development Agency (NOHDA) to provide onsite Homeownership services to LMH participants and the larger community. Furthermore, LMH, through key staff members, will also serve on various other committees throughout Toledo and surrounding areas, which ensures LMH maintains the pulse of the activities in these areas.

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 2020-2025 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 2020-2025. 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 (FHAP) 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.

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 2020-2025 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 DON oversees compliance for CDBG, ESG, HOME 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 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 PCA 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.

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

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. 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. On-site inspections of 92.251. On-site inspection must occur at least three years throughout the period of affordability.

The ultimate goal of the Owner-Occupied Rehabilitation program is to ensure any homeowner unit rehabbed 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 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. 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 rehabbed 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 citizens of their opportunity to provide public input and comment for a period of 15 days. The COT encourages its citizens to comment on achievements, or lack thereof, the manner in which funds are allocated and/or expended, and present an opportunity for citizens to make proposals or pose questions.

For the 2020-2021 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 citizens to provide public comments and attend the hearing. The public notice announcing the public hearing was also sent to all Third-Party Partners via e-mail.

In accordance with federal statute, the COT hold public hearings at a location accessible to all citizens. However, due to 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.

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

Thursday	08/12/2021	Public Notice sent to The Blade, The Toledo Journal and La Prensa
Sunday	08/15/2021	Public Notice published in The Blade
Wednesday	08/18/2021	Public Notice published in The Toledo Journal and La Prensa
Thursday	08/19/2021	Public Notice posted to the City of Toledo website
Monday	08/30/2021	DRAFT CAPER emailed to designated locations to post to websites
Tuesday	08/31/2021	15-day comment period begins
Thursday	09/02/2021	Virtual Public Hearing on DRAFT 2020 CAPER at 5:30 p.m. via Zoom
Tuesday	09/14/2021	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.

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, was signed, providing \$5 billion for Community Development Block Grant (CDBG) to rapidly respond to COVID-19 and the economic and housing impacts caused by this unprecedented crisis. The Act also provided \$4 billion for Emergency Solutions Grant (ESG) to prevent, prepare for, and respond to the Coronavirus pandemic (COVID-19) among individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19.

The city of Toledo submitted three (3) substantial amendments to include the CDBG-CV and ESG-CV funded activities that were implemented as a result of the CARES Act.

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 **HOME** information represents **Preliminary Data** related to the 2020 (46th) PY. The final data will be included in the final version of this CAPER.*

The following housing developments received on-site inspections by the Division of Housing during the 2020 program year: **Garden View Acres:** units - 1113 Rockcrest, 1105 Steeplebush and 1031 Steeplebush; **Renaissance Senior Apts:** units - 420, 210, 301, 2019 and 413; **Autumn Woods Village:** units - 636 Acton, 637 Acton and 4163 Piedmont; **Englewood Senior Housing:** units - 203, 210, 301 and 307; **Mercy Outreach Ministries IV:** units - 6325 & 3625 Nebraska Ave. Apts. A,B,C&D; **Woodside Village Apts.:** unit - 1045 Brookview; **Brookview Gardens:** units - 1051 Brookview, 1119 Hilltop & 5736 Staghorn; **Neighborhoods In Partnership:** unit - 2449 Putnam; **City Forest of Toledo:** unit - 1258 Woodland Ave; **City Forest of Toledo:** unit - 633 Tecumseh; **Vistula Building:** units - 2, 11, 14, 18, and 19; **Parqwood Apts.:** units - 236, 301, 308, 312, 315, 325 and 346; **Aurora Project:** units - 1023 N. Superior and 1025 N. Superior. All units passed inspection.

The following units still need to be inspected: **Roost 1:** units - 1623 Copley, 5337 Darlene, 5520 Nebraska, 4325 Holly Hill and 2180 Aberdeen; **Roost 2:** units - 5107 Adella and 2653 Nash; **REACH:** units - 1645 Eleanor, 201 E. Northgate, 2649 Northwood Ave., and 5615 Parkstone.

St. Hedwig: Not inspected. Will be inspected in program year 2021.

Legacy Hills: Not inspected. Will be inspected in program year 2021.

The COT conducts onsite inspections at least once every three years during the period of affordability (CFR 92.504(c)(6)(d)(ii).) 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)

Inspection Chart – HOME

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.

92.351(b)

The DON 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;
- 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 Division of Housing received **\$309,011.55** of Program Income (PI). However, no housing support activity was funded out of PI.

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)

Other actions the DON plans to take on during the next year will foster a continued desire to develop affordable rental housing ranging from direct community outreach; and communication with both private and non-profit housing developers. The DON will continue to maintain partnerships with Lucas Metropolitan Housing Authority (LMHA), NEIGHBORWORKS Toledo Region, LISC, OHFA and OCCH, as well as local lending institution, geared toward preserving rental units that are part of expiring LIHTC portfolios.

There continues to be a need for and availability of decent, safe and affordable housing stock for renters. This is important considering that Toledo's renter-occupied units surpasses the number of owner-occupied units. Many households' incomes remain stagnant, with continued increased barriers to obtaining their own homes also contributing to their current rent burden, placing households in unsafe homes as well as leaving little in the way of funds for food and basic needs once housing is paid for. As reported in the COT Consolidated Plan submission, 69.4% of rental households with incomes in the 0-30% bracket are living in conditions which cause them to have either a housing problem or a severe housing problem. As housing stock ages, it creates more substandard housing. It continues to remain an important goal of the Housing Division to concentrate a portion of its effort on improving rental housing stock.

There were no Low-Income Housing Tax Credit (LIHTC) projects initiated in PY2020. As it did in PY2019, the DON will continue to focus its efforts on existing rental housing. The following actions were taken to preserve existing rental housing:

- Notification of available funding (NOFA) for rental housing development was announced in December of 2020.
- After review of several applications, conditional commitments were made to prospective developers.
- Acquisition and construction of 58 Senior affordable rental units, Secor Senior Lofts, of which 5 units were HOME funded to allow for low income Senior rentals.

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 07/01/2020
Program Year End Date 06/30/2021

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

Subrecipient or Contractor Name: BEACH HOUSE FAMILY SHELTER, INC.

City: Toledo

State: OH

Zip Code: 43604, 1605

DUNS Number: 167489699

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 192,585

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: 41,000

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: 105,000

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: 44,000

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: 154,697

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

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

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

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

10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	75
Total Number of bed-nights available	479,975
Total Number of bed-nights provided	352,590
Capacity Utilization	73.46%

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 or the indicator is not applicable.

CR-75 – Expenditures

11. Expenditures

The following tables represent **Preliminary Data** related to ESG Expenditures for the 2020 (46th) PY. The final data will be included in the final version of this CAPER.

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	0	0	0

Table 23 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	41,721	139,038	71,798
Expenditures for Housing Relocation & Stabilization Services - Services	278,038	219,375	243,404
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	319,759	358,413	315,202

Table 24 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Essential Services	275,031	195,100	231,037
Operations	0	0	0
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	275,031	195,100	231,037

Table 25 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Street Outreach	0	0	0
HMIS	44,597	40,824	40,534
Administration	36,026	42,527	47,217

Table 26 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2018	2019	2020
	675,413	636,864	633,990

Table 27 - Total ESG Funds Expended

11f. Match Source

	2018	2019	2020
Other Non-ESG HUD Funds	70,124	85,014	65,830
Other Federal Funds	46,000	237,227	400,681
State Government	391,063	211,359	400,002
Local Government	0	661,654	515,000
Private Funds	367,091	327,397	201,967
Other	41,514	25,542	104,464
Fees	37,836	0	0
Program Income	0	0	0
Total Match Amount	953,628	1,548,193	1,687,944

Table 28 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2018	2019	2020
	1,629,041	2,185,057	2,321,934

Table 29 - Total Amount of Funds Expended on ESG Activities



ATTACHMENTS



Citizen Participation

**PUBLIC NOTICE
CITY OF TOLEDO
DEPARTMENT OF NEIGHBORHOODS
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
for
2020 Program Year – July 1, 2020 to June 30, 2021**

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The Draft CAPER will be available for review beginning **Monday, August 30, 2021**, on the website of the following entities:

Department of Neighborhoods
One Government Center, 18th Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/departments/neighborhoods>

Lucas Metropolitan Housing
435 Nebraska Avenue
Toledo, Ohio 43604
website: www.lucasmha.org

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

Toledo Lucas County Homelessness Board
1946 N. 13th Street, Suite 437
Toledo, Ohio 43604
website: www.endinghomelessness Toledo.org

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

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

The Fair Housing Center
326 N. Erie Street
Toledo, Ohio 43604
website: www.toledofhc.org

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

A public hearing on the CAPER is scheduled as follows:

Thursday, September 2, 2021, 5:30 p.m. by Virtual Hearing

Please click the link below to join the webinar:

<https://toledo-oh-gov.zoom.us/j/83764727325>

Or Telephone:

Dial:

USA 216 706 7052 US Toll

USA 866 528 2256 US Toll-free

Conference code: 800378

The City of Toledo will also receive comments from the public in writing beginning **Tuesday, August 31, 2021**, through **Tuesday, September 14, 2021**, at the following address:

CITY OF TOLEDO
DEPARTMENT OF NEIGHBORHOODS
2020-2021 CAPER
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

For reasonable accommodations or additional information, please contact Monica Brown, Administrative Analyst IV, Department of Neighborhoods at (419) 245-1400.

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Office of the Mayor One Government Center, 22 nd Floor Downtown Toledo, Jackson & Erie Streets website: https://toledo.oh.gov/government/mayor	Toledo Lucas County Homelessness Board 1946 N. 13 th Street, Suite 437 Toledo, Ohio 43604 website: www.endinghomelesnesstoledo.org
Clerk of Council One Government Center, 21 st Floor Downtown Toledo, Jackson & Erie Streets website: https://toledo.oh.gov/government/city-council/	Toledo-Lucas County Public Library 325 Michigan Street Toledo, Ohio 43604 website: www.toledolibrary.org
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PUBLIC NOTICE: City of Toledo Department of Neighborhoods Consolidated Annual Performance and Evaluation Report For 2020 Program Year – July 1, 2020 to June 30, 2021

 Wednesday, August 18, 2021

The City of Toledo is directed by the U.S. Department of Housing and Urban Development 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 Toledo Department of Neighborhoods: Community Development Block Grant (CDBG), Emergency Solutions Grants (ESG), HOME Investment Partnerships

Program (HOME), Neighborhood Stabilization Programs (NSP), and

Lead Hazard Control and Healthy Homes Grant.

The draft CAPER will be available for review beginning Monday, August 30, 2021, on the websites of the following:

Office of the Mayor

One Government Center, 22nd Floor
Toledo, Ohio 43604

[Mayor's Office](#) ➡

City of Toledo Department of Neighborhoods

One Government Center, 18th Floor
Toledo, Ohio 43604

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One Government Center, 21st Floor
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1154 Larc Lane
Toledo, Ohio 43614

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The Fair Housing Center

432 North Superior St.
Toledo, Ohio 43604

The Fair Housing Center ➡

A virtual public hearing on the CAPER is scheduled for 5:30 p.m., Thursday, September 2, 2021.

Please click the link below to join the webinar: <https://toledo-oh-gov.zoom.us/j/83764727325>, or by telephone dial 866 528 2256, conference code: 800378

The City of Toledo will also receive comments from the public in writing beginning Tuesday, August 31, 2021, through Tuesday, September 14, 2021, at the following address:

City of Toledo, Department of Neighborhoods 2020-2021 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](tel:419-245-1198) or submit a request online at toledo.oh.gov/ada.



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**Department of Neighborhoods to Report Accomplishments;
Encourages Public Comments**

Toledo, OH (August 30, 2021) - The city of Toledo's (COT) Department of Neighborhoods is seeking comments on its **DRAFT** Consolidated Annual Performance and Evaluation Report (CAPER). Citizens are invited to participate in a virtual Public Hearing and learn more about how the City utilized federal dollars for the benefit of low- and moderate-income residents during the Program Year 2020 (ending on June 30, 2021). A summary of the **DRAFT** CAPER will be presented at the following hearing:

Thursday, September 2, 2021

5:30 p.m. by Virtual Hearing

<https://toledo-oh-gov.zoom.us/j/83764727325>

Comments on the 2020 **DRAFT** CAPER are welcome at the Public Hearing. The city of Toledo will accept written comments from the public beginning **Tuesday, August 31, 2021** through **Tuesday, September 14, 2021** by submittal to: City of Toledo, Department of Neighborhoods, 2020-2021 CAPER, One Government Center, Suite 1800, Toledo, Ohio 43604 or by email to: monica.brown@toledo.oh.gov

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Downtown Toledo, Jackson & Erie Streets
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Lucas Co. Board of Developmental Disabilities
1154 Larc Lane
Toledo, Ohio 43614
website: www.lucasdd.info

The **2020 DRAFT CAPER** presentation will provide an assessment of the federally funded programs monitored by the COT's Department of Neighborhoods:

- **Community Development Block Grant (CDBG) for community, economic and housing development;**
- **HOME Investment Partnerships Program (HOME) for housing development;**
- **Emergency Solutions Grant (ESG) for the elimination of homelessness;**
- **Neighborhood Stabilization Programs (NSP) for housing development; and**
- **Lead Hazard Control and Healthy Homes Grant**
- **Other HUD Grants & Grants from the U. S. Treasury**

The Department of Neighborhoods continues to work closely with the Toledo Lucas County Homelessness Board to assist in the goal of eliminating and reducing homelessness and with The Fair Housing Center to affirmatively further fair housing in Toledo. At the Public Hearing, more information will be provided related to the progress achieved in these areas.

For more information or reasonable accommodations, please contact the Department of Neighborhoods in advance (Monica Brown at (419) 245-1400 or email at: monica.brown@toledo.oh.gov)

Brown, Monica

From: Thorpe, Susan
Sent: Friday, August 27, 2021 11:04 AM
To: EAST TOLEDO FAMILY CENTER; HELPING HANDS OF; LEGAL AID OF WESTERN OHIO, INC.; 'mhoffman@nhainc.org'; MLK KITCHEN FOR THE POOR, INC; 'mmcintyre@mvhabitat.org'; 'mwolff_etsac@yahoo.com'; NEIGHBORHOOD HEALTH ASSOCIATION, IN; 'scrabtree@ablelaw.org'; TOLEDO SEAGATE; NEIGHBORWORKS TOLEDO REGION; 'Yvonne Dubielak'; Zgodzinski, Eric; 'vmartinez@lawolaw.org'; 'rschuster@toledodiocese.org'; 'believecenter@yahoo.com'; 'jhabib@spcc-toledo.org'; 'dargatza@co.lucas.oh.us'; 'jb_sqacc@yahoo.com'; 'Jeff Swiech'; 'believecenter@gmail.com'; 'emcpartland@mvhabitat.org'; 'GrantWriter'; 'mindy@seagatefoodbank.org'; 'Kachinger@mvhabitat.org'; 'DeniseF@auroraprojectinc.org'; 'rjordan@pathwaytoledo.org'; 'chuckp@auroraprojectinc.org'; 'eod.sqacc@gmail.com'; 'matt.morris@unitedwaytoledo.org'; 'jodig@etfc.org'; 'cfellman@ablelaw.org'; 'dstefansky@toledodiocese.org'; 'antdurand8213@gmail.com'; 'LindaSkowronek@toledofhc.org'; 'carol.gray@toledogrows.org'; 'wendy.pesttrue@unitedwaytoledo.org'; 'cmiller@pathwaytoledo.org'; 'gcommu8708@bex.net'; 'pageelaine1@aol.com'; 'tamholliker@aol.com'; 'Marc D. Folk'; 'jjarrett@theartscommission.org'; 'mcullying@theartscommission.org'; 'rbunch@theartscommission.org'; 'cwilson@preferred-properties.org'; 'sfriedman@toledofhc.org'; 'dpeluso@familyhousetoledo.org'; 'stacic@etfc.org'; 'jfrost@nhainc.org'; 'mcassidy@preferred-properties.org'; 'msachs@nwtoledo.org'; 'lweller@lawolaw.org'; 'sshrewsbury@toledodiocese.org'; Welch, David; 'mariemflannery@toledofhc.org'; 'lpengov@spcc-toledo.org'; 'Tonia Pace'; 'dalexander@familyhousetoledo.org'; 'mjacomet@nwtoledo.org'; 'jacksonv@co.lucas.oh.us'; 'anneruch@gmail.com'; 'zach.steinmetz@ampf.com'; 'jmpinskey@gmail.com'; 'nancy.elzinga@gmail.com'; 'kbond@lucasmha.org'; 'Vonzelle Hill'; 'Scott Herr'; 'rgagnon@tlchb.org'; 'jcintronvega@lucasmha.org'; 'grantsadministrator@tlchb.org'; 'elaina@believecenter.org'; 'janeltate@gmail.com'; 'jblack@pathwaytoledo.org'; 'sifuentesh@co.lucas.oh.us'; 'eellis@toledodesigncollective.org'; 'Martin Jarret'; 'paul@toledodesigncollective.org'; 'dmann@co.lucas.oh.us'; Brownlee, Shantae; 'sshackelford@co.lucas.oh.us'; Stone, Robin; 'gthomas@toledofhc.org'; 'Mary Beth Steele'; Kristie Clark; Patricia Allison; 'byoung@peferred-properties.org'; 'dvasquez@preferred-properties.org'
Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene
Subject: 2020-2021 CAPER Virtual Public Hearing (REMINDER)
Attachments: 2020-2021 CAPER Public Notice-.doc

Importance: High

Good morning,

Just a friendly reminder -

The City of Toledo, Department of Neighborhoods has scheduled a public hearing on the Draft 2020-2021 Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER includes the undertakings, activities, and accomplishments completed during the 2020-2021 Program Year and provides an assessment of the federally funded programs administered by the Department of Neighborhoods.

You are invited to attend the public hearing on the Draft 2020-2021 CAPER.

The public hearing is scheduled as follows:

Thursday, September 2, 2021, 5:30 p.m., by Virtual Hearing

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<https://toledo-oh-gov.zoom.us/j/83764727325>

Or Telephone:

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USA 866 528 2256 US Toll-free

Conference code: 800378

Please see the attached public notice for further details.

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

Visit us at: www.toledo.oh.gov

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TOLEDO, OHIO 43604

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Fair Housing Report

Fair Housing Action Plan: July 2020 – June 2021 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.

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.

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.

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.

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.

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.

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.

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.

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.

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.
- 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.

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.

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.

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.

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- 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.

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

- 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

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

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

Fair Housing Issue: Voucher Mobility

Goal: LMHA 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	LMHA, 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	LMHA	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	LMHA	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	LMHA	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	LMHA	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	LMHA	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.

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, MHRSB, 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.

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.

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.

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.
 - 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.
 - 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.

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.

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.

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.
- The Ability Center fielded 215 calls from individuals with disabilities who had housing issues.

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.

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.

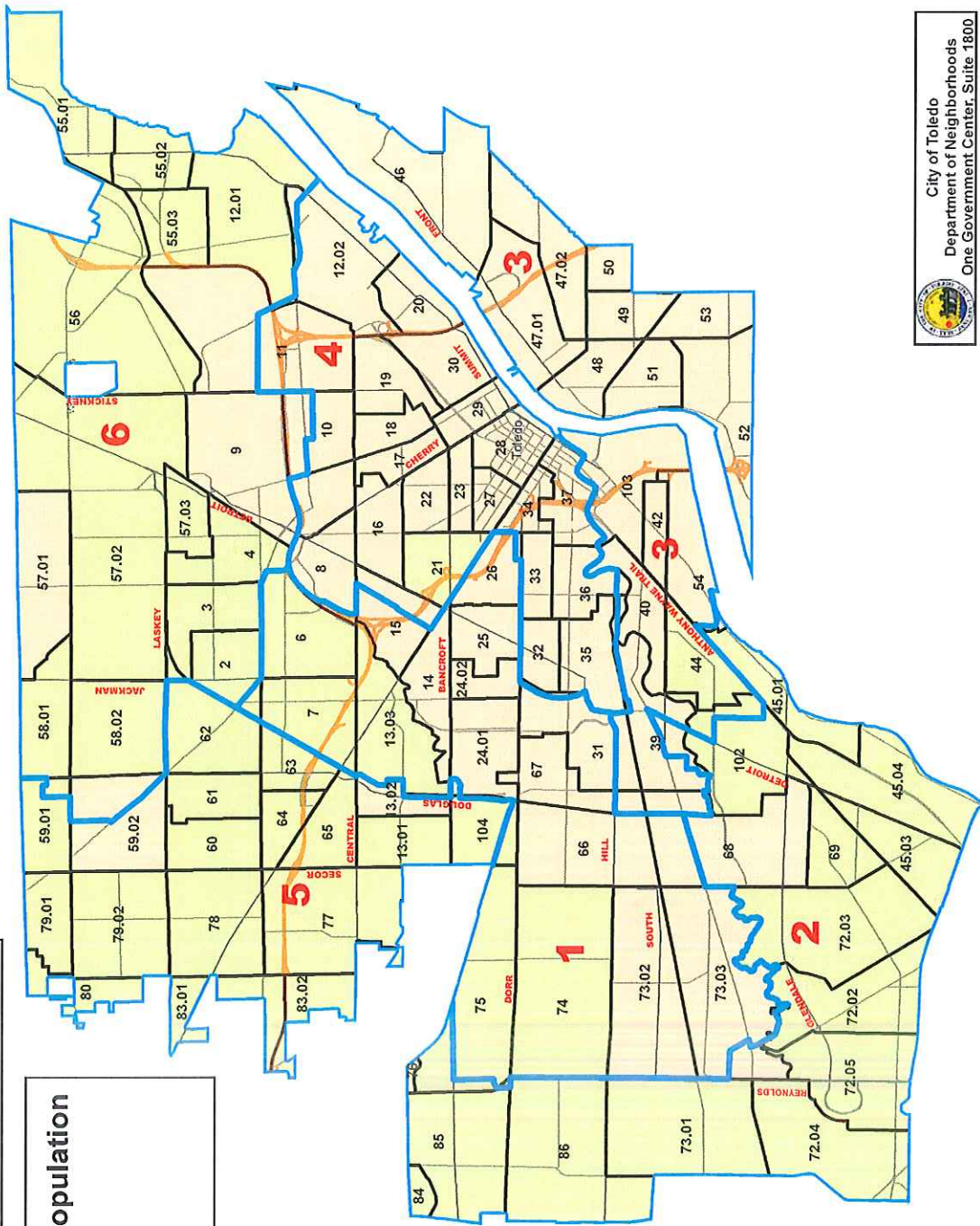


Maps

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

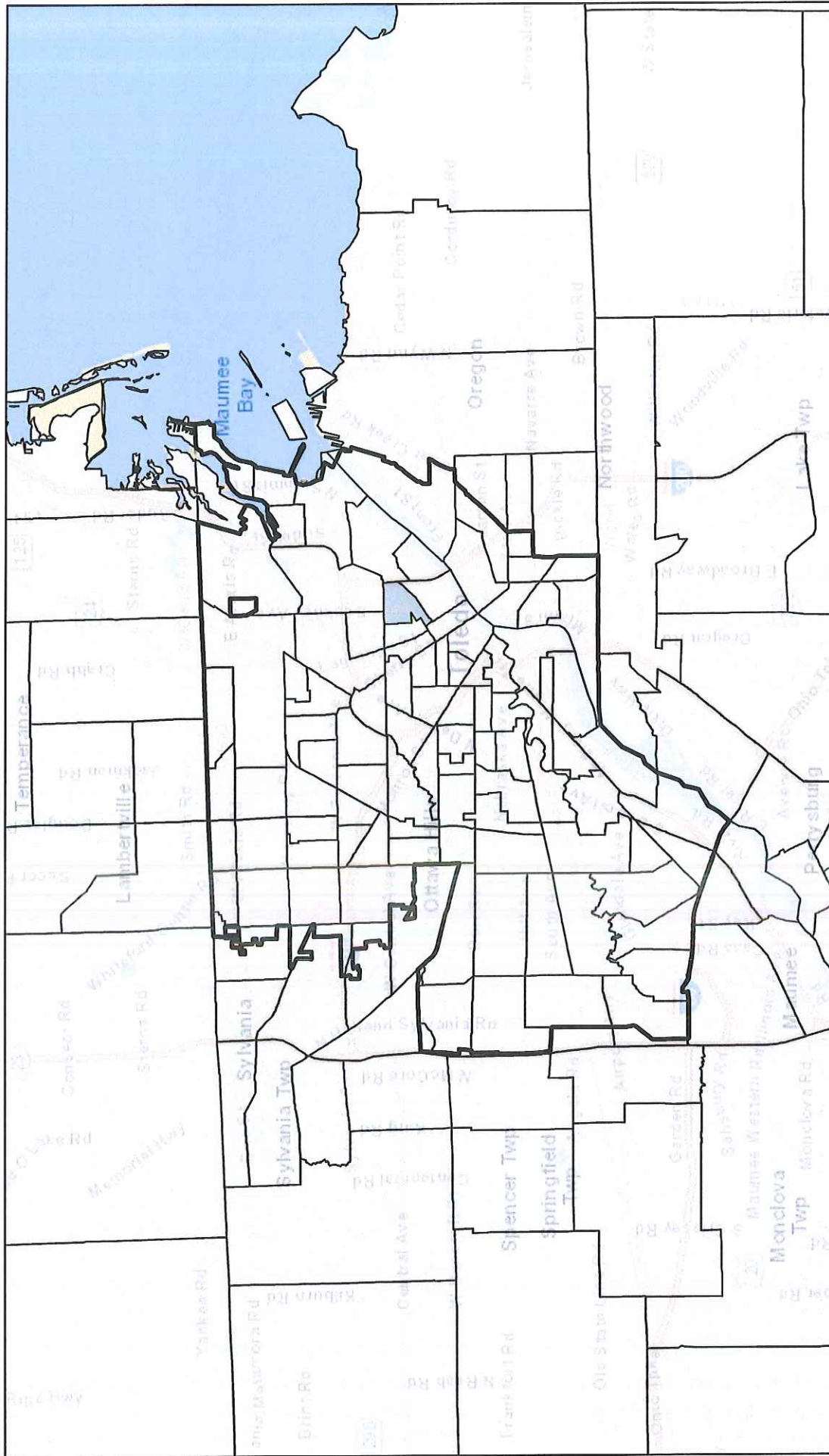
Low - and - Moderate Income by Population

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



City of Toledo
Department of Neighborhoods
One Government Center, Suite 1800

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



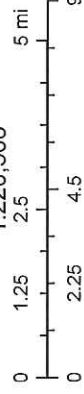
April 29, 2021

Override 1 2.48-9.78%

AmericanIndianAlaskaNativeAlone

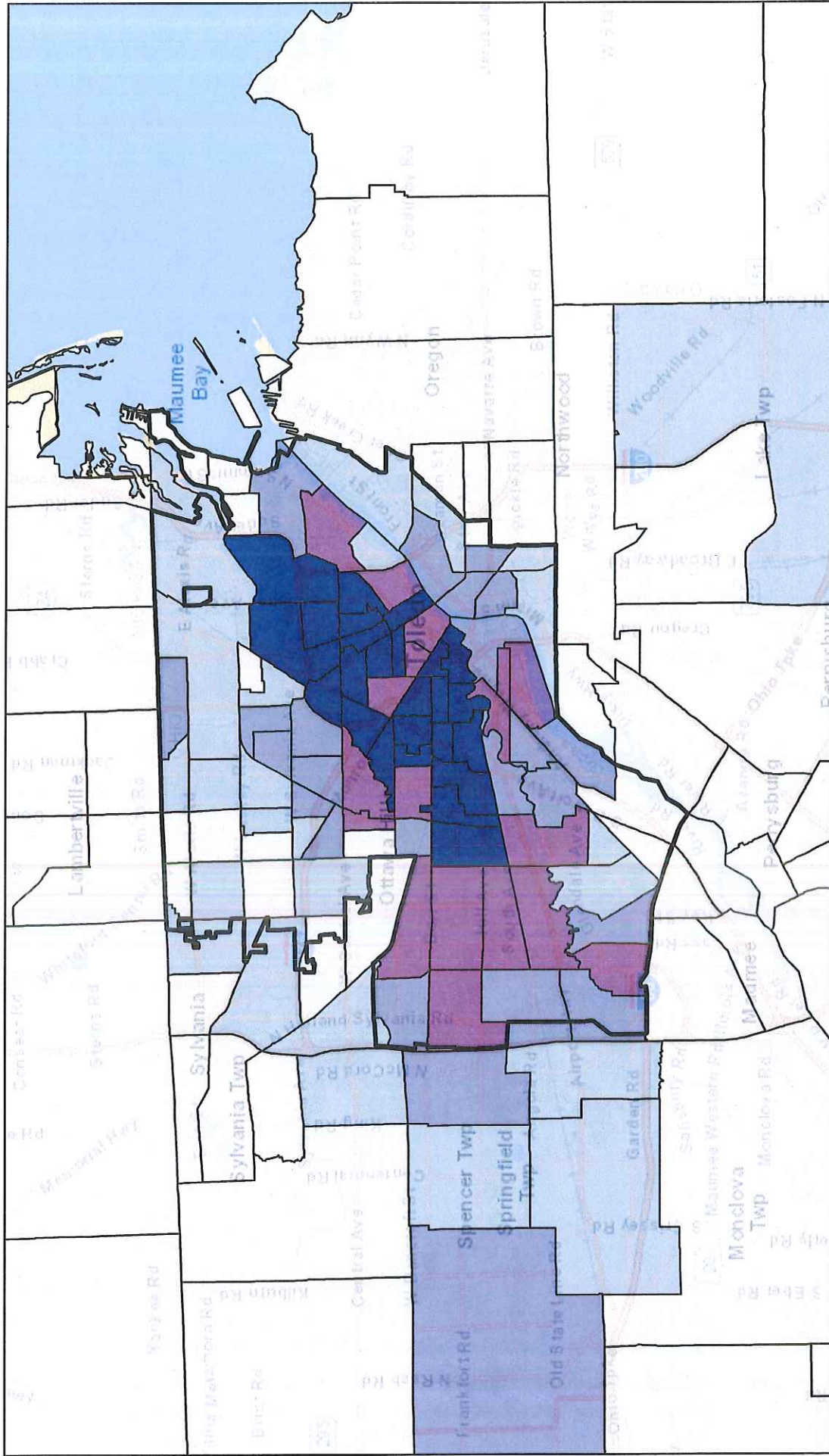
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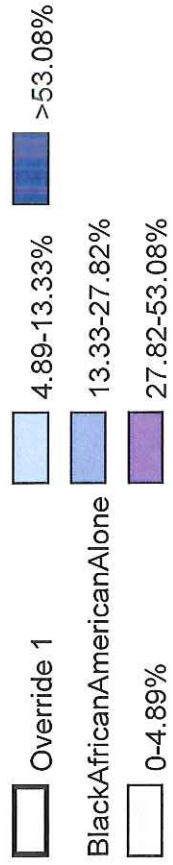


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

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



April 29, 2021

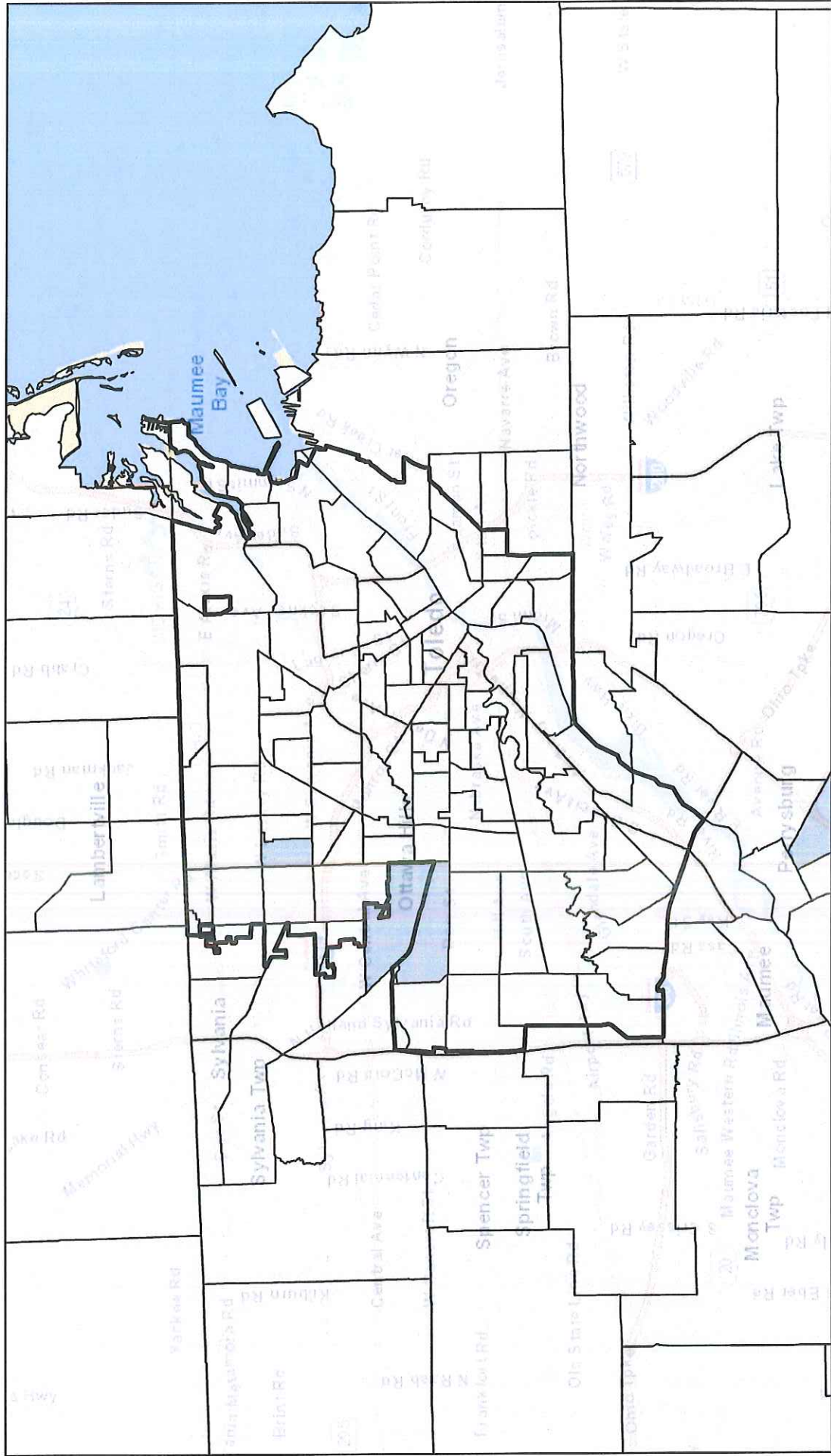


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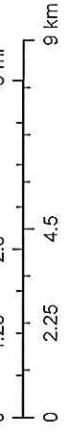
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

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



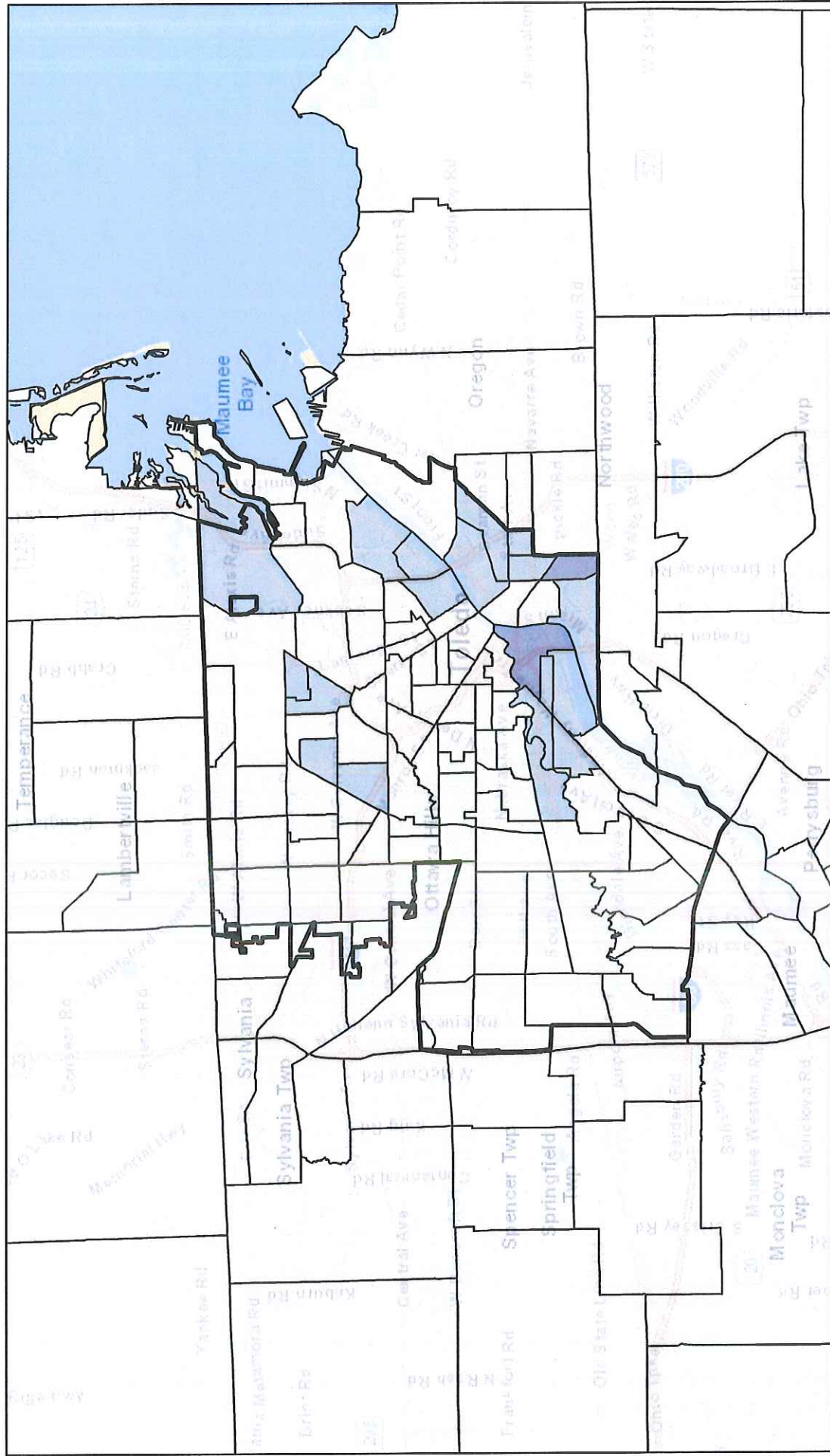
April 29, 2021

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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

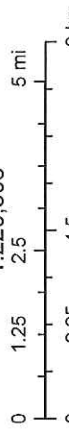
Hispanic Population in Toledo - Concentration of Minorities per Census Tract -



April 29, 2021

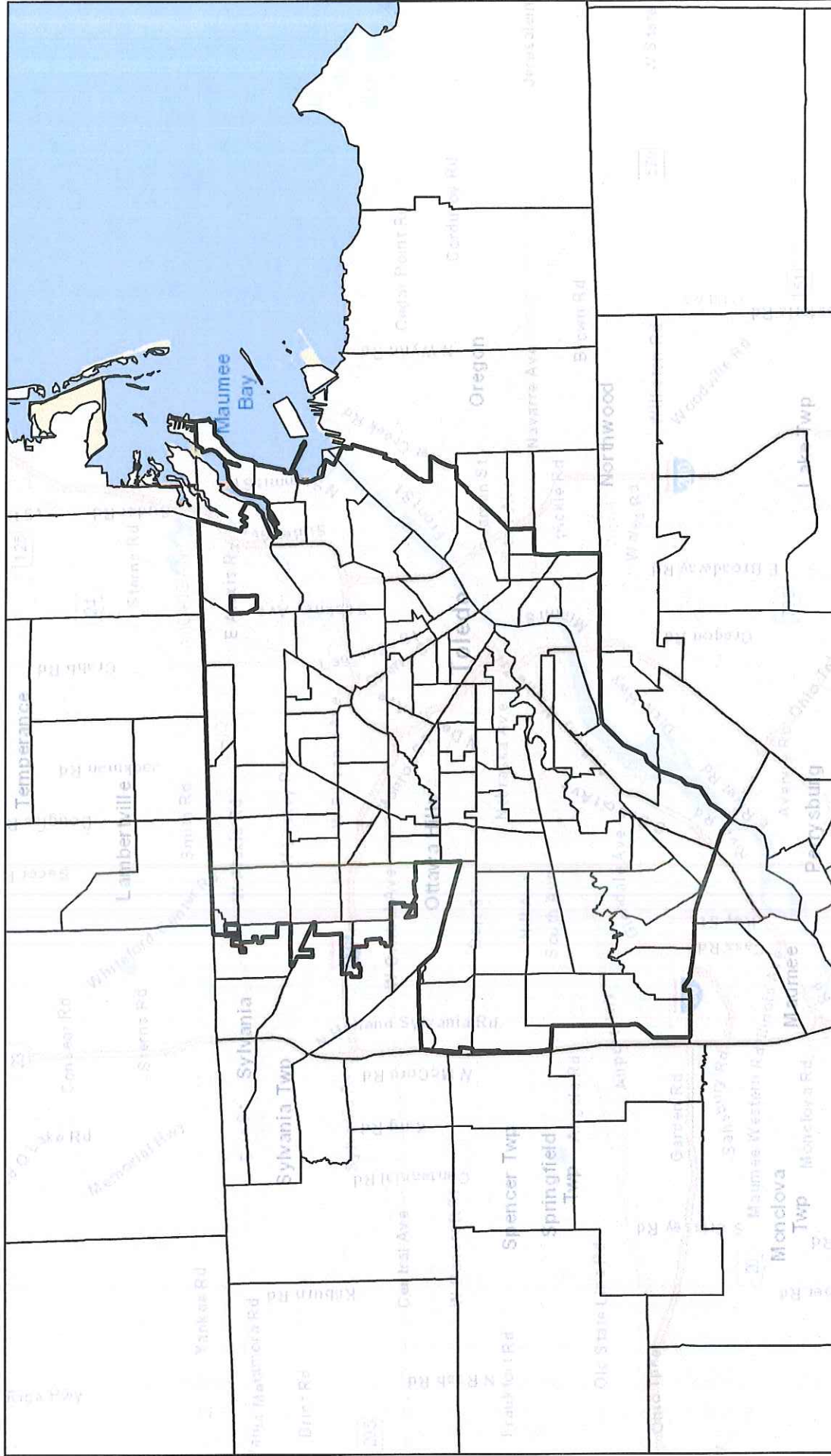


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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

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



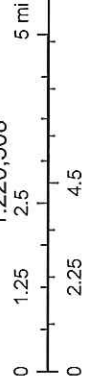
April 29, 2021

Override 1

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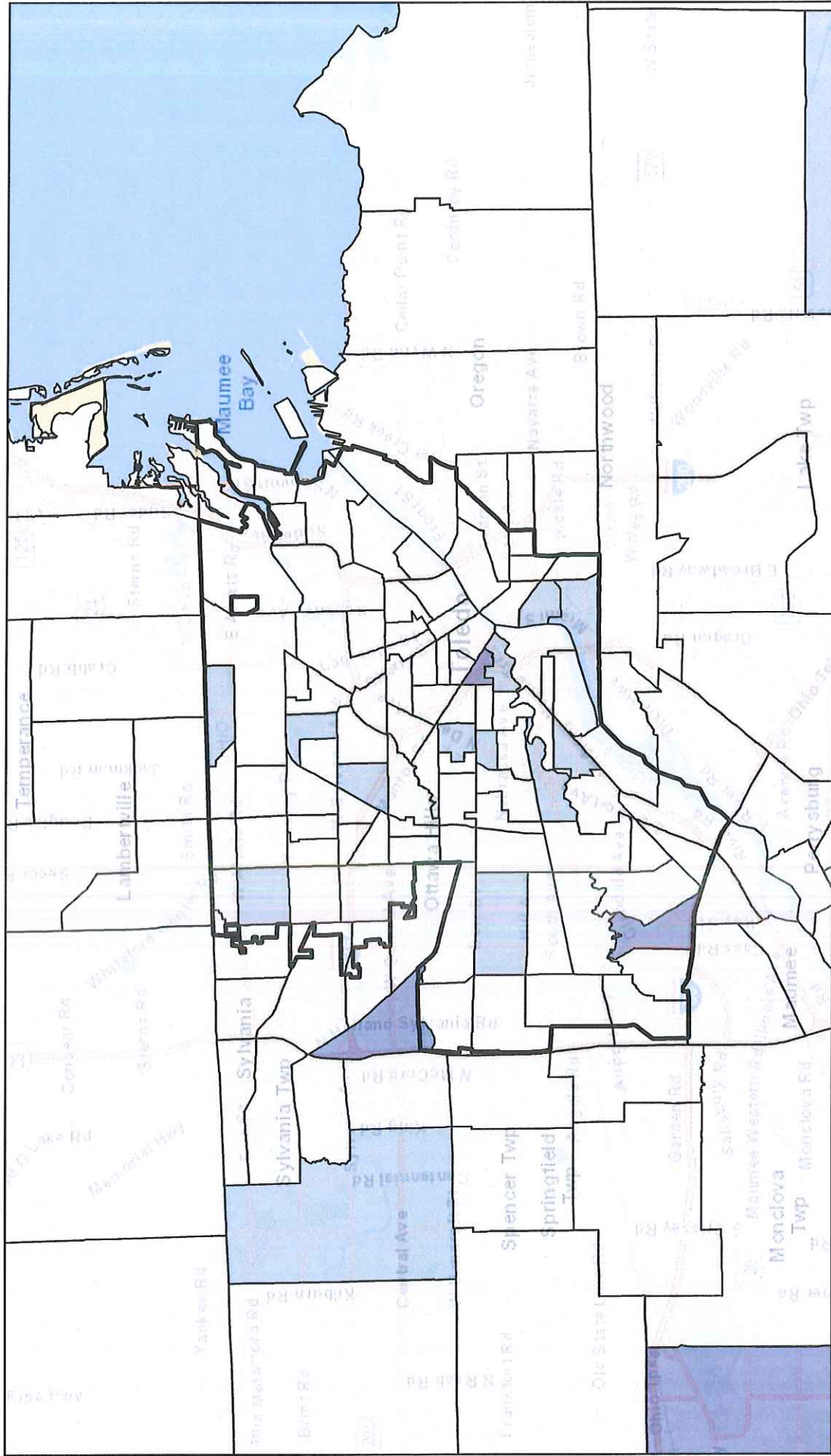
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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

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



April 29, 2021

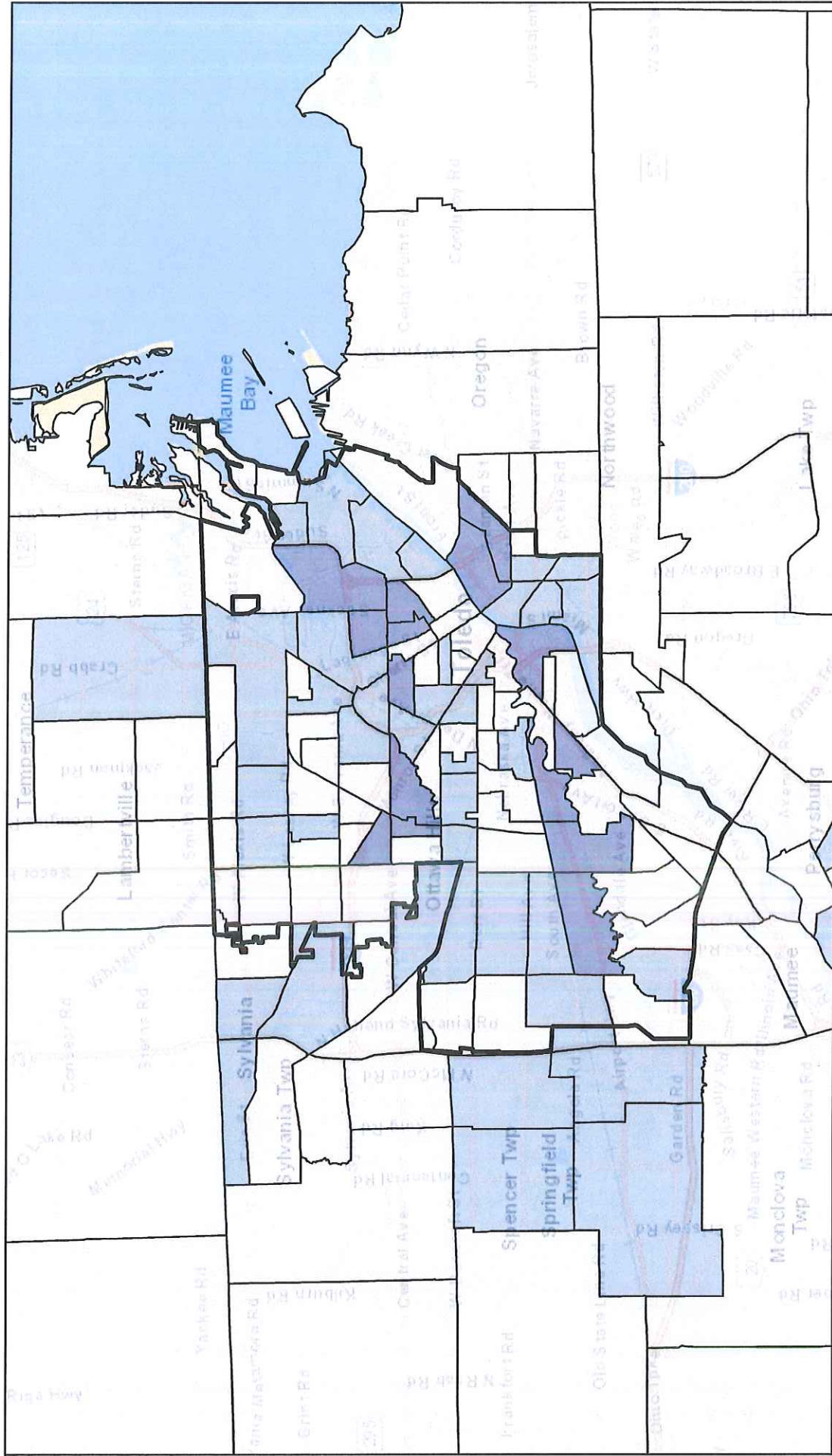


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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NPICan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

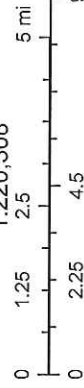
Two or More Races Population in Toledo - Concentration of Minorities per Census Tract -



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

Indicator Snapshot for First Quarter 2020

Indicator (1Q2020)	Emergency	Permanent		
	Shelter	Transitional Housing	Supportive Housing	Rapid Rehousing
Exits to Permanent Housing	95%	25%	90%	67%
Positive or Neutral Reason for Leaving Program	95%	25%	90%	67%
Short Term Recidivism for Exits During 1Q2020	5%	0%	0%	5%
Average Length of Stay in Days	79	68	1024	582
PSH Retention	n/a	n/a	65%	n/a
Improvements in Income	10%	33%	0%	12%
Adults Employed at Exit	13%	0%	0%	0%
Households Exiting with Non Cash Benefits	70%	67%	64%	85%

Indicator Snapshot for Second Quarter 2020

Indicator (2Q2020)	Emergency	Permanent		Rapid
	Shelter	Transitional	Supportive	Rehousing
		Housing	Housing	
Exits to Permanent Housing	93%	80%	100%	100%
Positive or Neutral Reason for Leaving Program	93%	80%	100%	100%
Short Term Recidivism for Exits During 2Q2020	0%	0%	0%	0%
Average Length of Stay in Days	86	82	869	546
PSH Retention	n/a	n/a	93%	n/a
Improvements in Income	4%	11%	25%	9%
Adults Employed at Exit	6%	11%	13%	40%
Households Exiting with Non Cash Benefits	60%	78%	67%	78%

Indicator Snapshot for Third Quarter 2020

Indicator (3Q2021)	Emergency Shelter	Transitional Housing	Permanent	
			Supportive Housing	Rapid Rehousing
Exits to Permanent Housing	80%	100%	44%	79%
Positive or Neutral Reason for Leaving Program	80%	100%	44%	79%
Short Term Recidivism for Exits During 3Q2020	8%	0%	0%	22%
Average Length of Stay in Days	58	8	1265	646
PSH Retention	n/a	n/a	93%	n/a
Improvements in Income	13%	0%	6%	8%
Adults Employed at Exit	8%	0%	0%	25%
Households Exiting with Non Cash Benefits	58%	50%	40%	69%

Indicator Snapshot for Fourth Quarter 2020

Indicator (4Q2021)	Emergency Shelter	Transitional Housing	Permanent	
			Supportive Housing	Rapid Rehousing
Exits to Permanent Housing	95%	100%	100%	88%
Positive or Neutral Reason for Leaving Program	95%	100%	100%	88%
Short Term Recidivism for Exits During 4Q2020	5%	0%	0%	12%
Average Length of Stay in Days	79	70	986	644
PSH Retention	n/a	n/a	87%	n/a
Improvements in Income	10%	0%	0%	10%
Adults Employed at Exit	7%	0%	0%	20%
Households Exiting with Non Cash Benefits	68%	50%	83%	50%



**ESG CAPER to be
included in the final
version of this CAPER**