

# Strategic Plan

## SP-10 Geographic Priorities – 91.215(a)(1)

### General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

National economic conditions continue to affect the revitalization and stabilization of Toledo neighborhoods. Investment will be prioritized to benefit low- to moderate-income individuals, including minorities, seniors and persons with disabilities. The Department of Neighborhoods will concentrate its efforts in the most economically disadvantaged areas of the city. To reach the goals identified in this plan, efforts will be concentrated in those census tracts where more than 51% of the population is low-moderate-income (please see attached map). Low –moderate-income census tracts are:

8, 9, 10, 11, 12.02, 13.02, 14, 15, 17, 18, 19, 20, 22, 23, 24.01, 24.02, 25, 26, 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.

The City, in adherence to HUD regulations, will allocate at least 70% of its 2015-2019 CDBG entitlement award to programs that directly benefit low- to moderate-income individuals.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 47 – Priority Needs Summary

1	<b>Priority Need Name</b>	Prevention and Reduction of Blight
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Demolition of Blighted Properties Housing Code Enforcement and Nuisance Abatement Decrease Rodents in the City of Toledo Establish and Maintain Community Gardens
	<b>Description</b>	Prevention and reduction of blighted properties that affect neighborhood conditions and present safety and health hazards to the community.
	<b>Basis for Relative Priority</b>	Economic conditions (particularly loss of income due to unemployment and underemployment) affecting the housing market contribute to the deterioration of properties in low- moderate- income areas and in tipping point neighborhoods. Demolition of blighted properties is a major concern in the City due to the aging housing stock and the high incidence of fires on vacant structures in Toledo (in 2013 and 2014, over 360 vacant units were affected by fire). Abandoned houses and rubble left by fires provide an environment that attract rodents and pose a health hazard to residents. In the community survey, demolition of blighted properties and housing code enforcement were rated as the highest priorities related to housing issues. Community gardens assist in converting unproductive vacant land into productive uses.
2	<b>Priority Need Name</b>	Public (Social) Services - 15% of CDBG eligible
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Physical Disabilities Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Youth Programs Soup Kitchens and Feeding Programs Educational Enrichment & Life Skills Programs Health Services
	<b>Description</b>	<b>(Per 24 CFR 570.201, activities to meet the goals under this priority funded with CDBG dollars are subject to 15% CDBG expenditure cap on public services.)</b>  Work with social service organizations to assist with service or funding gaps and leverage other funding sources to provide services that meet basic human needs, lead individuals to obtain or maintain self-sufficiency and in increase quality of life.
	<b>Basis for Relative Priority</b>	Public services in the community are also addressed by other Federal, State and local agencies. CDBG funds will address gaps in services while leveraging funding in programs that ensure access to food, health care, and other services that empower individuals and families to become self sufficient and improve their quality of life. Some residents are teetering on the edge of self sufficiency need social service programs in order to avoid any adverse impact that could lead them to homelessness.
<b>3</b>	<b>Priority Need Name</b>	Economic Development
	<b>Priority Level</b>	High

<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
<b>Geographic Areas Affected</b>	
<b>Associated Goals</b>	Increase Neighborhood Grocery & Basic Need Stores Job Creation/Retention Business Recruitment/Retention Assistance Contaminated Sites Remediation
<b>Description</b>	<p>Economic development activities leading to the creation and retention of businesses and jobs are a high priority to propel momentum to the slow economic recovery since the recession began. Particularly, increasing the number of jobs that offer a living wage is needed in Toledo. Although unemployment continues to decrease in Toledo, underemployment is an issue. Educational attainment is directly related to the unemployment and wages earned. The market analysis (MA-45 Educational Attainment table) reflects that 41% of Toledoans with less than a high school degree are unemployed while that number decreases as the educational attainment is higher (18% for high school graduates and 5% for those with a bachelor's degree or higher).</p> <p>All economic development goals were rated high in the community survey.</p>
<b>Basis for Relative Priority</b>	<p>The implementation of strategic programs that assist businesses with resources to locate or remain in Toledo continues to be essential for the community's economic stability and growth. A good mix of businesses/industries in the community generates an attractive environment for increased investments impacting available jobs. Increase in the number of jobs is as important as the quality of available jobs. The creation and retention of living wage jobs are the key to decreasing the number of residents living at the poverty level (the 2009-2013 Census estimate of the percentage of families and people in Toledo whose income in the past 12 months is below the poverty level is 22.3% while the 2006-2010 Census estimate is 19.3%). As referred in the market analysis, two issues prevent citizens from earning living wages: specialized skills and academic preparation to meet the demands of the current job market. Therefore, strategies to implement and expand training and other programs that assist citizens in maintaining or improving their employment status are essential for continued economic growth.</p>

<b>4</b>	<b>Priority Need Name</b>	Elimination of Homelessness (15% of CDBG eligible)
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Emergency Shelters Transitional Housing Youth Homelessness Coordinated Access Permanent Supportive Housing Rapid Re-Housing and Direct Financial Assistance
	<b>Description</b>	The City will work with its Continuum of Care (CoC), the Toledo-Lucas County Homelessness Board (TLCHB) and its entire network of homeless service providers to prevent and end homelessness by providing solutions through the coordination of programs and services.

	<b>Basis for Relative Priority</b>	<p>The City of Toledo and the TLCHB, which is the CoC’s primary decision making body, are committed to fostering a positive response to the McKinney-Vento Act as reauthorized by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. Progress continues towards accomplishing the strategies outlined in the community’s plan to end homelessness (CASE to Prevent, Reduce and End Homelessness). Emphasizing rapid re-housing through a coordinated assessment and network of community services is a priority for efforts in ending homelessness, particularly chronic homelessness and homelessness for families with children.</p> <p>Although the unemployment rate has declined from 12.2% in 2009 to 15.8% in December of 2014, the poverty rate of 24% is higher than the county’s 20% and the national rate of 15.8%. Individuals living at or below the poverty level are the most vulnerable to experiencing a homeless situation. Therefore, work on homelessness continues to be a high priority for Toledo.</p>
5	<b>Priority Need Name</b>	Affordable Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Individuals Families with Children Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	

<b>Associated Goals</b>	Housing Repairs and Rehabilitation Home Repairs for Seniors and the Disabled Elimination of Lead-Based Paint Home Buyer Down Payment/Closing Costs Assistance Rapid Re-Housing and Direct Financial Assistance New Construction
<b>Description</b>	Quality affordable housing, both owner-occupied and rental units, continues to be a need in Toledo neighborhoods. The Housing Needs Assessment (NA-10) clearly identifies the lack of affordable housing with housing cost burden being the most common housing problem. Most housing affordable to low-moderate – income individuals is in need of updates and repairs due to its age. Another indicator of the need for quality affordable housing is the large number of families on the waiting list for public housing (more than 7,000) (see NA-35 Public Housing in the Needs Assessment portion of this document). The public housing authority, Lucas County Metropolitan Housing Authority (LMHA), is also facing an aging housing inventory and is directing efforts towards improvements and modernizations of their units (see MA-25 Public and Assisted Housing). New construction is a low priority goal and will only be undertaken as considered appropriate.
<b>Basis for Relative Priority</b>	<p>Three factors are main contributors to the need for quality affordable housing:</p> <ul style="list-style-type: none"> <li>• the aging housing stock,</li> <li>• economic conditions; and</li> <li>• an aging population.</li> </ul> <p>According to the 2009-2013 American Community Survey (ACS) 5-Year Estimates, over 63% of Toledo’s occupied housing units were built in 1959 or earlier and only 0.2% were built in 2010 or later. Most of the aging housing stock is located in low-moderate – income areas. Existing economic conditions make it difficult for low-moderate-income households to dedicate part of their incomes for housing repairs, rehabilitation and modifications. According to the ACS 5-Year estimates, the percentage of families and people whose income is below the poverty level has increased from 19.3% in the 2006-2010 estimates to 22.3% in the 2009-2013 estimates, reflecting a continuing upward trend for future years. Additionally, households with one or more people 65 years and over continues to increase (ACS 5-Year Estimates for 2007-2011 is 25,798 households and 26,626 in the 2009-2013 ACS 5-Year estimates). As people live longer and recent trends to encourage seniors to stay in their homes as long as possible, the need for housing repairs and rehabilitation will continue to increase. Furthermore, the movement toward increased independence for people with disabilities will continue to expand the need for housing modifications.</p>

6	<b>Priority Need Name</b>	Transportation
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Transportation Assistance
	<b>Description</b>	Assist with transportation issues affecting individuals and families economic stability.
	<b>Basis for Relative Priority</b>	<p>Programs that assist individuals and families to stabilize employment and obtain opportunities for increased income are needed to reduce poverty in Toledo. Transportation has been identified in the community survey and by community service providers as an obstacle to obtaining and maintaining employment. Depending on public transportation is not always conducive to families with children and individuals who may have an opportunity to work extended hours or night-time shifts. The Toledo Metropolitan Area Council of Governments (TMACOG) in its <i>Transportation Needs and Opportunities Summary</i> report refers to public transit as the issue cited most frequently in their research and public surveys. TMACOG findings mirror the concerns identified through our Citizen Participation process and highlight the following:</p> <ul style="list-style-type: none"> <li>• People who do not have a car have trouble running errands and getting to jobs or to school. Buses run infrequently at night, or on weekends.</li> <li>• Some Toledo suburbs and most smaller towns in the region are not connected to each other or to Toledo by any public transit system.</li> <li>• When buses are available, bus routes and transfers make the trip much longer than a car ride would be.</li> <li>• Travel by foot or bicycle is considered difficult in our region.</li> </ul>
7	<b>Priority Need Name</b>	Obtaining/Maintaining Housing Affordability

	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Housing Tax Incentives Foreclosure Prevention / Housing Counseling Preventative Housing Maintenance Housing Legal Assistance
	<b>Description</b>	<b>(Per 24 CFR 570.201, activities to meet the goals under this priority and funded with CDBG dollars may be subject to 15% CDBG expenditure cap on public services.)</b>  Stabilize families and decrease the rapid growth of housing deterioration by assisting in maintaining or increasing housing affordability.
	<b>Basis for Relative Priority</b>	Recent ACS estimates reflect a tendency for decline in homeownership. The 2007-2011 estimates report home ownership at 57% of occupied units and rental living at 43%; the 2009-2013 ACS estimates indicate a decrease in homeownership of 2% and an increase in renters of 2%. To avoid further decline in the rate of homeownership, programs to maintain and increase home affordability are essential. Empowering home owners with the knowledge to adequately maintain their homes decreases the need for costly home repairs and rehabilitation projects; therefore, preserving the housing stock. Limited knowledge of the complex and ever changing housing legal and financial environment affects a family's home stability resulting in need for assistance for home owners and renters. Additionally, information in the Needs Assessment indicates greater housing needs among minorities, particularly African-Americans. National and local statistics confirm that minorities and low-income individuals have been largely affected by the sub-prime mortgage market. Programs addressing housing issues that threaten housing affordability for home owners or renters are still in need and contribute towards recovery from the recent recession.
<b>8</b>	<b>Priority Need Name</b>	Fair Housing

<b>Priority Level</b>	Low
<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
<b>Geographic Areas Affected</b>	
<b>Associated Goals</b>	Fair Housing
<b>Description</b>	Fair housing practices ensure that safe, adequate and affordable housing is available to all individuals without discrimination.
<b>Basis for Relative Priority</b>	Monitoring and enforcement of fair housing laws and regulations is an ongoing need in the Toledo community. Residents need to be assured that they have the option to select housing of their choice without any obstacles. Education is a very important component for residents and property owners/managers. The Analysis of Impediments published by the Fair Housing Center provides details regarding fair housing issues in the community and list action steps towards the elimination of existing barriers.

**Narrative (Optional)**

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
<p>Tenant Based Rental Assistance (TBRA)</p>	<p>The Toledo Lucas County Homelessness Board, through the collection, analysis, and dissemination of data collected, has evidence that supports a rapid re-housing model as an efficient model for reducing homelessness, with 89% of households exiting to permanent housing and only 2% returning to homelessness within the first six months. The Project HOME program, funded through state and federal sources, includes rapid re-housing as one of its components. Historically, those persons who are homeless within the Toledo community face greater barriers in finding safe, adequate and affordable housing. The barriers that homeless persons face, such as multiple evictions, poor rent history, criminal history, is compounded by other underlying issues that may have contributed to their homelessness in the first place, e.g., mental illness and/or substance abuse, among others. These barriers, without proper support, reduce the success rate of being placed into housing successfully. The goal of the program is to identify and assess those homeless persons with increased barriers and work with participants to obtain housing while providing comprehensive case management that will provide opportunity for self-sufficiency.</p> <p>Based on the unmet need of obtaining housing for those with the most barriers, funds from TBRA (funded through the HOME Investment Partnership grant) will assist the community in achieving this goal. The City of Toledo works in partnership with the Toledo Lucas County Homelessness Board, Beach House, Inc., FOCUS, and Lutheran Social Services of Northwest Ohio in the administration of this program. The target population consists of those person and/or households identified as homeless.</p> <p>This three-year program, only in its pilot stage (initial funding received in November 2013), has already identified a specific demographic that has utilized services. Domestic violence victims represent 29% of those assisted to date. While only raw data is available now, it is expected that the need to assist those with more barriers will remain.</p>
<p>TBRA for Non-Homeless Special Needs</p>	<p>At present, there is no special needs population other than homeless persons that the City of Toledo expects to fund with TBRA.</p>

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
New Unit Production	An assessment of the type of housing available is required, including the price range. Within the lower income households, needs could be summarized as needing more decent, safe and sanitary housing so that the percentage of those living with some type of housing problem decreases. Although in general, current demand for new units is not warranted, the need for more market rate housing may be warranted based on new businesses that may relocate within city limits. An equal effort to ensure retail, commercial and neighborhood services are available in the proximity of potential new businesses could generate capital within the city limits. For purposes of HUD funding, this effort would be parallel to any rehabilitation of low- and moderate-income housing units.
Rehabilitation	The number of units available within the City of Toledo, based on the 2006-2010 ACS, is 140,034. Of those, 64% are 1-unit detached structures. The Needs Assessment, using 2011 data, showed that 119,359 households were in need of housing. A further breakdown of the type of units required is needed in order to ensure that households are right-sized into their units. One of the factors that cause either a housing or severe housing problem is having more than 1.0 or 1.5 persons per room. Using these criteria, at the present time, 56% of households are residing in a unit with at least one housing/severe housing problem. The need for rehabilitation, in the past Plan, remained the number one priority throughout the past five years and continues to be high priority in Toledo.
Acquisition, including preservation	In general, the City of Toledo's Department of Neighborhoods Housing Division does not engage in acquisition.

**Table 48 – Influence of Market Conditions**

## SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

### Introduction

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	6,781,364	573,844	0	7,355,208	0	Per HUD, the Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community development needs. The CDBG program works to ensure decent affordable housing, to provide services to the most vulnerable in our communities, and to create jobs through the expansion and retention of businesses. The annual allocations are typically fully expended every program year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,548,474	0	0	1,548,474	0	Per HUD, the HOME Investment Partnerships Program (HOME) provides formula grants to States and localities that communities use to fund a wide range of activities including homeowner rehabilitation, home buyer activities, rental housing and tenant-based rental assistance, with the intent to provide safe, adequate and decent affordable housing to lower-income households and expand the capacity of non-profit housing providers.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	614,067	0	0	614,067	0	In accordance with the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, HUD distributes Emergency Solutions Grant (ESG) funds to communities for street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and homeless management information systems. The annual allocations are typically fully expended every program year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Competitive McKinney-Vento Homeless Assistance Act	public - federal	Other	175,000	0	0	175,000	525,000	Toledo Public Schools receives McKinney-Vento Homeless Assistance Funds for school transportation, school supplies, school uniforms, tutoring and programming needs. The amount of funds to be received depends upon the federal funding allocated to homeless youth and upon the need in the district.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Continuum of Care	public - federal	Admin and Planning Rapid re-housing (rental assistance) Rental Assistance TBRA Transitional housing Other	4,388,180	0	0	4,388,180	16,200,000	The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly re-house homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Acquisition Admin and Planning Homeowner rehab New construction for ownership	897,102	0	0	897,102	897,102	Beginning in 2009, the City of Toledo received NSP funds from HUD for concentrated efforts in revitalizing areas with the highest concentration of foreclosures. The City of Toledo spent all awarded funds and met HUD's expenditure deadlines. Program income generated by the sale of NSP properties is expected to be available to use during the duration of this Consolidated Plan. As required by regulations, 25% of generated program income will be set aside to address the housing needs of households whose incomes do not exceed 50% of the Area Median Income (AMI). The remaining NSP funds will benefit families and individuals whose incomes do not exceed 120% AMI.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - state	Homeowner rehab Multifamily rental rehab	0	0	0	0	750,000	The Ohio Housing Development Assistance Program (HDAP) offers affordable housing opportunities through the provision of construction costs to local developers to support projects. Assistance is offered in the form of Low-Income Tax Credits (LIHTC). United North Corporation, a local Community Development Corporation, plans to receive these funds for the construction of 44 senior housing units in the St. Hedwig Housing Project. There is no guarantee that applying agencies will receive a share of the annual LIHTC distribution. The City of Toledo anticipates some funds within the five years of this Consolidated Plan.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - local	Acquisition Admin and Planning Other	4,500,000	0	0	4,500,000	7,500,000	The Land Reutilization Program (Land Bank) is a community improvement corporation designed to strengthen neighborhoods in Lucas County by returning vacant and abandoned properties to productive use.

Table 49 - Anticipated Resources

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Federal funds combined with state, private and local dollars assist the City of Toledo in addressing the needs of low- to moderate-income individuals as it pertains to their housing needs and stabilization of Toledo neighborhoods. Combined available resources, as well as strategic partnerships, will assist in addressing the priority needs identified in this Consolidated Plan. With the infusion of federal, state and local resources, Toledo citizens will continue to: access basic services; enjoy stabilized, safer and cleaner neighborhoods; have access to improved employment opportunities; increase efforts to eliminate homelessness; remove barriers to independent living; and increase homeownership.

Federal resources when combined with other state and local resources give the community increased capacity to address the community needs. Evidence of this enhanced capacity will continue to be noticed in the increased number of people that will be served with basic housing and other needs affecting City of Toledo residents. Federal, state and local resources will continue to strengthen the City of Toledo and provide better quality of life opportunities for citizens.

Matching requirements leverage federal funds allocated to undertake the activities that will assist in meeting the goals identified in this plan. As a policy of the Department of Neighborhoods, CDBG third-party partners are required to provide a minimum of a 1:1 match for each CDBG dollar

requested. ESG dollars allocated to third-party partners also require a 1:1 match. The matching requirement for HOME dollars is set by HUD based on criteria related to severe fiscal distress. As stated in CFR 92.218, contributions counted as match must total not less than 25% of funds drawn from HOME. The City's 2014 matching requirement continues at 0% and it is expected to remain the same for 2015. In PY2013, HUD determined the matching requirement for Toledo at 0%.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

To carry out housing, economic and community development activities, CDBG and HOME funded programs may obtain publicly owned land or property through the Lucas County Land Bank. The Land Bank acquires vacant and abandoned foreclosed properties and find ways to convert them to productive use. Additionally, the Land Bank makes grants to promote home ownership, renovation and energy efficiency. Meeting HUD's objectives of Benefit to low- and moderate-income persons and Elimination of Slum and Blight, includes the utilization of public land or property. Likewise, the following goals established in this plan may utilize public land or property:

- Demolition of Blighted Properties
- Decrease Rodents in the City of Toledo
- Establish and Maintain Community Gardens
- Contaminated Sites Remediation for Re-development
- Down Payment/Closing Costs Assistance (through acquisition and rehabilitation of properties)
- New construction

Additionally, CDBG funds will be used to support administrative activities of the Real Estate Division of the Department of Development. The Real Estate Division, in assisting citizens and businesses with the listing and purchasing of City-owned parcels, real estate tax abatements and programs, also contributes to the re-purpose of public land.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Toledo - Department of Neighborhoods	Government	Economic Development Homelessness Ownership Planning Rental neighborhood improvements public services	Jurisdiction
Department of Development	Government	Economic Development	Jurisdiction
City of Toledo - Department of Law	Government	Ownership Rental	Jurisdiction
City of Toledo - Code Enforcement Division	Government	neighborhood improvements	Jurisdiction
City of Toledo - Beautification Action Team (Division of Code Enforcement)	Government	neighborhood improvements	Jurisdiction
City of Toledo - Plan Commission	Government	Planning	Jurisdiction
Toledo Lucas Cnty Homelessness Board	Continuum of care	Homelessness	Other
Lucas County Metropolitan Housing Authority (LMHA)	Government	Public Housing	Other
LUCAS COUNTY	Government	Economic Development Homelessness Ownership Rental neighborhood improvements public services	Other

<b>Responsible Entity</b>	<b>Responsible Entity Type</b>	<b>Role</b>	<b>Geographic Area Served</b>
Mental Health and Recovery Services Board	Government	public services	Other
UNITED WAY OF GREATER TOLEDO	Non-profit organizations	Homelessness public services	Region
Lucas County Board of Developmental Disabilities	Government	public services	Other
OhioMeansJobs - Lucas County	Government	Economic Development	Other
Lucas County land Reutilization Corporation	Government	neighborhood improvements	Other
Lucas County Regional Health District	Government	public services	Region
UNITED NORTH	CHDO	Ownership Rental	Jurisdiction
NeighborWorks Toledo Region	CHDO	Ownership Rental	Jurisdiction
Local Initiatives Support Corporation Toledo	Non-profit organizations	Ownership Rental neighborhood improvements	Other
Preferred Properties, Inc.	CHDO	Rental	Other
Northwest Ohio Development Agency	Non-profit organizations	Ownership	Region
Toledo Area Regional Transit Authority (TARTA)	Government	public services	Region
Toledo Lucas County Port Authority	Other	Economic Development	Region
Neighborhood Properties		Homelessness Rental	Other
Fair Housing Center	Non-profit organizations	Ownership Planning Public Housing Rental	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Lucas County Department of Job and Family Services	Government	public services	Other
AIDS Resource Center Ohio	Non-profit organizations	Homelessness public services	Region

**Table 50 - Institutional Delivery Structure**

### **Assess of Strengths and Gaps in the Institutional Delivery System**

The context of the City of Toledo’s 2015-2020 Five-Year Consolidated Plan is an inter-jurisdictional effort. Many institutional structures, both directly and indirectly, assist in the identification of gaps, preparation and implementation of steps to address the gaps, and leveraging resources to undertake activities to close those gaps. Efforts aimed at enhancing the coordination between and by service agencies, housing agencies, private sector and public sector agencies are achieved through the cooperation of a myriad of diverse entities.

For efforts that directly relate to housing, the Division of Housing and Neighborhoods Development works closely with LMHA, the Homebuilders Association of Greater Toledo, CHDOs, Toledo Lucas County Homelessness Board, Lucas County Land Bank and other regional partners to undertake and promote stable housing activities.

The Year 16 Initiative, comprised of local and regional partners, will continue in 2015-2020. Members of this initiative continue to assess the status of both current and expiring LIHTC projects to ensure that households are provided the opportunity to purchase homes and that both potential homebuyers and renters reside in decent and safe housing. Integral to this goal is ensuring that potential homebuyers are able to not only obtain housing, but given the tools to preserve and maintain the housing. Households must be afforded access to non-traditional financing mechanisms and have debt right-sized to make long-term homeownership affordable. Key is having a dedicated sales expert/staff to work with tenants through the process.

CHDOs, other developers and local lenders will continue to collaborate with the City of Toledo as program income from the NSP grants will assist with rehabilitation, redevelopment and lease or sale of housing units.

Elimination of homelessness issues mandate that a regional continuum of care be active so as to promote collaborative efforts and reduce duplication of service. The City continues to remain an active partner within the CoC and maintains a productive relationship with TLCHB, the lead agency in the CoC. The TLCHB and the COT will continue to promote systemic change within the continuum, as required by the HEARTH Act. United Way of Greater Toledo manages the Toledo/Lucas County CoC’s local

coordinated access system, a centralized intake process established as the primary entry for homelessness services. Many other local non-profits, faith-based institutions, community advocates, food programs, physical and mental health agencies, and special needs population advocates, remain an integral part of the CoC.

Community development not only encompassed housing and homeless issues, but the stability of jobs and employment within a community. The City of Toledo's Department of Economic and Business Development (DEBD) will continue to utilize its position to promote access for job creation, job retention and business development.

Gaps remain and are further affected by reduced funding. The economic climate lends itself to carefully evaluate decisions that positively impact jobs and, thus, income. Oftentimes, organizations undertake activities on a parallel line, creating service silos. Though efforts are duplicative in certain cases, the reluctance of organizations to relinquish direct ownership and management of specialized services remains. Recognizing the existence of these gaps, as well as the silos, the City of Toledo will continue to seek partnerships, coordination or collaboration and funds that contributed to stability and growth for residents of the City of Toledo.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

<b>Homelessness Prevention Services</b>	<b>Available in the Community</b>	<b>Targeted to Homeless</b>	<b>Targeted to People with HIV</b>
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	
Transportation	X	X	X
<b>Other</b>			

**Table 51 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The Toledo Lucas County Continuum of Care (CoC) collaborates with local agencies to provide housing and other wrap around services to customers. Local collaborations include organizations such as: Department of Neighborhoods, Lucas County Commissioners, Neighborhood Properties, Inc., Mental Health and Recovery Services Board, Lucas Metropolitan Housing Authority, local shelters, transitional housing, hospitals, schools, mental health providers, law enforcement, Criminal Justice Coordinating Council, and any other service provider that may touch a customer in the process of providing services. To ensure that the CoC understand the needs of those we are targeting (i.e. chronic homeless, homeless

veterans), the CoC has enlisted the assistance of currently and formerly homeless persons to provide knowledge and input to the design and implementation of the local CoC processes.

The CoC also utilizes data produced from the HMIS system to correlate the numbers reported to the information being presented by the homeless and formerly homeless persons that are providing input. By utilizing this process the CoC has been able to focus service delivery more effectively and target any areas with an identified gap more rapidly to get services to the target populations.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

Locally, the Toledo Lucas County CoC has community wide agreements in place for the delivery of services to customers. These agreements, normally in the form of MOU's, have allowed the creation of a more coordinated delivery system with better access for customers with more concentrated focus on needs for re-housing.

Within this system, some gaps still exist in the coordination of services, caused mainly by the inability of some agencies to share client data. In holding community meetings to discuss this issue, we have identified many competing needs that have to work their way through the laws of HIPAA, mental health regulations, and HMIS regulations. These meetings have become another strength in the system as we bring multiple providers to the table together to find a common ground and establish solutions for customers' needs.

In terms of people living with AIDS, (PLWHA), funding is insufficient to provide the needed access to mental/behavioral health services needed by PLWHA as a supportive service/healthcare need. Lack of flexibility in housing program to meet the varying needs of PLWHA is another gap in the service delivery system.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City of Toledo Department of Neighborhoods and the Toledo Lucas County CoC have been working with the CoC in the pursuit of solutions to data sharing and understanding of the regulations homeless service providers must follow. The solution will incorporate the prioritization of target populations and account for the protection of PPI and HIPAA information. Once a process can be designed and approved, the CoC will be able to track clients more effectively from initial contact through permanent housing placement.

ARC Ohio staff is active in the local continuum of care efforts, service delivery model and input into the local HMIS system. Evaluating need and availability of HOPWA funds to consider allocation a portion of funds to the Permanent Housing Placement (PHP) category would allow for payment of first month's

rent, security deposit and utility connection fees. Collect data to continue to support need and effort to secure funds to improve availability of behavioral health issues for PLWHA.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Demolition of Blighted Properties	2015	2019	Affordable Housing		Prevention and Reduction of Blight		Buildings Demolished: 700 Buildings
2	Housing Code Enforcement and Nuisance Abatement	2015	2019	Affordable Housing		Prevention and Reduction of Blight		Housing Code Enforcement/Foreclosed Property Care: 150000 Household Housing Unit
3	Decrease Rodents in the City of Toledo	2015	2019	Affordable Housing		Prevention and Reduction of Blight		Housing Code Enforcement/Foreclosed Property Care: 5500 Household Housing Unit
4	Establish and Maintain Community Gardens	2015	2019	Non-Housing Community Development		Prevention and Reduction of Blight		Public service activities other than Low/Moderate Income Housing Benefit: 3500 Persons Assisted
5	Health Services	2015	2019	Non-Housing Community Development		Public (Social) Services - 15% of CDBG eligible		Public service activities other than Low/Moderate Income Housing Benefit: 20000 Persons Assisted
6	Youth Programs	2015	2019	Non-Housing Community Development		Public (Social) Services - 15% of CDBG eligible		Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Soup Kitchens and Feeding Programs	2015	2019	Affordable Housing Non-Housing Community Development		Public (Social) Services - 15% of CDBG eligible		Public service activities other than Low/Moderate Income Housing Benefit: 45000 Persons Assisted
8	Educational Enrichment & Life Skills Programs	2015	2019	Non-Housing Community Development		Public (Social) Services - 15% of CDBG eligible		Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted
9	Job Creation/Retention	2015	2019	Non-Housing Community Development		Economic Development		Jobs created/retained: 20 Jobs
10	Business Recruitment/Retention Assistance	2015	2019	Non-Housing Community Development		Economic Development		Businesses assisted: 300 Businesses Assisted
11	Contaminated Sites Remediation	2015	2019	Non-Housing Community Development		Economic Development		Businesses assisted: 2 Businesses Assisted
12	Increase Neighborhood Grocery & Basic Need Stores	2015	2019	Affordable Housing		Economic Development		Businesses assisted: 10 Businesses Assisted
13	Coordinated Access	2015	2019	Homeless		Elimination of Homelessness (15% of CDBG eligible)		Public service activities for Low/Moderate Income Housing Benefit: 7500 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	Rapid Re-Housing and Direct Financial Assistance	2015	2019	Homeless		Affordable Housing Elimination of Homelessness (15% of CDBG eligible)		Public service activities for Low/Moderate Income Housing Benefit: 500 Households Assisted
15	Permanent Supportive Housing	2015	2019	Homeless		Elimination of Homelessness (15% of CDBG eligible)		Public service activities for Low/Moderate Income Housing Benefit: 150 Households Assisted  Homelessness Prevention: 350 Persons Assisted
16	Emergency Shelters	2015	2019	Homeless		Elimination of Homelessness (15% of CDBG eligible)		Homeless Person Overnight Shelter: 6000 Persons Assisted
17	Transitional Housing	2015	2019	Homeless		Elimination of Homelessness (15% of CDBG eligible)		Homeless Person Overnight Shelter: 750 Persons Assisted
18	Youth Homelessness	2015	2019	Homeless		Elimination of Homelessness (15% of CDBG eligible)		Homeless Person Overnight Shelter: 40 Persons Assisted
19	Home Repairs for Seniors and the Disabled	2015	2019	Affordable Housing		Affordable Housing		Homeowner Housing Rehabilitated: 500 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
20	Elimination of Lead-Based Paint	2015	2019	Affordable Housing		Affordable Housing		Rental units rehabilitated: 100 Household Housing Unit  Homeowner Housing Rehabilitated: 500 Household Housing Unit
21	Housing Repairs and Rehabilitation	2015	2019	Affordable Housing		Affordable Housing		Rental units rehabilitated: 40 Household Housing Unit  Homeowner Housing Rehabilitated: 500 Household Housing Unit
22	Home Buyer Down Payment/Closing Costs Assistance	2015	2019	Affordable Housing		Affordable Housing		Direct Financial Assistance to Homebuyers: 40 Households Assisted
23	New Construction	2015	2019	Affordable Housing		Affordable Housing		Rental units constructed: 43 Household Housing Unit  Homeowner Housing Added: 15 Household Housing Unit
24	Transportation Assistance	2015	2019	Non-Housing Community Development		Transportation		Public service activities other than Low/Moderate Income Housing Benefit: 40 Persons Assisted
25	Housing Tax Incentives	2015	2019	Affordable Housing		Obtaining/Maintaining Housing Affordability		Other: 250 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
26	Preventative Housing Maintenance	2015	2019	Affordable Housing		Obtaining/Maintaining Housing Affordability		Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
27	Foreclosure Prevention / Housing Counseling	2015	2019	Affordable Housing		Obtaining/Maintaining Housing Affordability		Public service activities for Low/Moderate Income Housing Benefit: 325 Households Assisted
28	Housing Legal Assistance	2015	2019	Public Housing		Obtaining/Maintaining Housing Affordability		Public service activities for Low/Moderate Income Housing Benefit: 400 Households Assisted
29	Fair Housing	2015	2019	Affordable Housing		Fair Housing		

Table 52 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Demolition of Blighted Properties
	<b>Goal Description</b>	Demolition of vacant and abandoned dilapidated/blighted properties which have been identified as unsuitable for rehabilitation and pose a health hazard and discourage redevelopment efforts.
2	<b>Goal Name</b>	Housing Code Enforcement and Nuisance Abatement
	<b>Goal Description</b>	Inspection and enforcement of housing codes to reduce blighted properties and improve neighborhood conditions.

3	<b>Goal Name</b>	Decrease Rodents in the City of Toledo
	<b>Goal Description</b>	Programs to decrease rodent activity within the city.
4	<b>Goal Name</b>	Establish and Maintain Community Gardens
	<b>Goal Description</b>	Establish and maintain community and rain gardens as well as promote urban agriculture in underutilized and vacant sites. This activity may be subject to the CDBG 15% Public Service cap.
5	<b>Goal Name</b>	Health Services
	<b>Goal Description</b>	Assist in the provision of quality affordable medical care for low- moderate-income individuals.
6	<b>Goal Name</b>	Youth Programs
	<b>Goal Description</b>	Programs for youth ages 13-19 that assist in the development of skills leading to healthy and productive lives.
7	<b>Goal Name</b>	Soup Kitchens and Feeding Programs
	<b>Goal Description</b>	Programs that assist with meals and groceries.
8	<b>Goal Name</b>	Educational Enrichment & Life Skills Programs
	<b>Goal Description</b>	Empower individuals through educational programs and programs that assist in developing and increasing self sustainability.
9	<b>Goal Name</b>	Job Creation/Retention
	<b>Goal Description</b>	Increase job opportunities through assistance to small-medium size private businesses.
10	<b>Goal Name</b>	Business Recruitment/Retention Assistance
	<b>Goal Description</b>	Programs and assistance to encourage establishment and growth of small-medium private businesses (grants/loans/technical assistance/incentives).

11	<b>Goal Name</b>	Contaminated Sites Remediation
	<b>Goal Description</b>	Contaminated site remediation for commercial re-development of underutilized, vacant sites.
12	<b>Goal Name</b>	Increase Neighborhood Grocery & Basic Need Stores
	<b>Goal Description</b>	Make neighborhoods more attractive by increasing availability/accessibility of neighborhood grocery and basic need stores therefore reducing transportation costs and promoting economic development.
13	<b>Goal Name</b>	Coordinated Access
	<b>Goal Description</b>	Operate a centralized system for homeless assistance to determine needs and match individuals/families with the type of assistance needed.
14	<b>Goal Name</b>	Rapid Re-Housing and Direct Financial Assistance
	<b>Goal Description</b>	Provide rental financial assistance to prevent homelessness and assist the homeless in obtaining/retaining permanent housing. Assistance consist of rent, deposits, utilities payments, etc.
15	<b>Goal Name</b>	Permanent Supportive Housing
	<b>Goal Description</b>	Provide long-term community-based housing, which includes supportive services for homeless persons with disabilities.
16	<b>Goal Name</b>	Emergency Shelters
	<b>Goal Description</b>	Provide temporary shelter for the homeless for a period of 90 days or less. Supportive services may or may not be provided in addition to the provision of shelter.
17	<b>Goal Name</b>	Transitional Housing
	<b>Goal Description</b>	Provide supportive housing services to facilitate the movement of homeless individuals and families to permanent housing, generally for up to 24 months.
18	<b>Goal Name</b>	Youth Homelessness
	<b>Goal Description</b>	Support programs for homeless, unaccompanied, single youth and young adults up to age 24 who experience homelessness.

19	<b>Goal Name</b>	Home Repairs for Seniors and the Disabled
	<b>Goal Description</b>	Home repairs and modifications to allow seniors and people with disabilities to remain in their residences, including emergency repairs.
20	<b>Goal Name</b>	Elimination of Lead-Based Paint
	<b>Goal Description</b>	Elimination of lead-based paint in homes where pregnant women or children under the age of six reside.
21	<b>Goal Name</b>	Housing Repairs and Rehabilitation
	<b>Goal Description</b>	Acquisition and rehabilitation of abandoned or deteriorated properties for home ownership or rent and rehabilitation of owner occupied and rental units.
22	<b>Goal Name</b>	Home Buyer Down Payment/Closing Costs Assistance
	<b>Goal Description</b>	Assistance to first-time homebuyers with down payment/closing costs.
23	<b>Goal Name</b>	New Construction
	<b>Goal Description</b>	New construction of single-family or multi-family homes for homeownership and rental. This goal is a low priority and will only be undertaken as considered appropriate.
24	<b>Goal Name</b>	Transportation Assistance
	<b>Goal Description</b>	Assistance with programs resulting in obtaining or maintaining jobs to prevent or decrease unemployment and underemployment due to transportation barriers/issues.
25	<b>Goal Name</b>	Housing Tax Incentives
	<b>Goal Description</b>	Housing tax incentives to promote neighborhood development such as Community Reinvestment Area designations.
26	<b>Goal Name</b>	Preventative Housing Maintenance
	<b>Goal Description</b>	Training for homeowners to understand basic home systems and preventive maintenance.

27	<b>Goal Name</b>	Foreclosure Prevention / Housing Counseling
	<b>Goal Description</b>	Education and/or counseling and financial assistance (when resources are available) to prevent foreclosure.
28	<b>Goal Name</b>	Housing Legal Assistance
	<b>Goal Description</b>	Legal assistance for housing issues (e.g. eviction, foreclosure cases, landlord-tenant mediation, etc.). Activities under this goal may be subject to the 15% Public Service Cap.
29	<b>Goal Name</b>	Fair Housing
	<b>Goal Description</b>	Elimination of discrimination in the provision of housing and housing-related services and elimination of segregation by affirmatively promoting inclusive communities and increasing supply of genuinely open housing.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

As defined by HOME, the estimated number of extremely low income, low income and moderate income families to be provided affordable housing is 259 households. Affordable housing will be provided through new construction, rehabilitation of owner occupied or rental units and down payment assistance.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

N/A

### **Activities to Increase Resident Involvements**

Focused training and further development of newly formed Central Resident Advisory Board

- Solidify structure and purpose of Board and support its development of a strategy to approach next Annual Plan development and communication plan with LMHA management
- Collaborate with Central Resident Advisory Board to refine survey tool to collect input from residents to issues identified as negatively impacting their living environment

Some of the other programs offered by LMHA to increase resident involvement include:

- Resident Councils at each multifamily site
- Girls Leadership Academy (GLA)
- Resident Opportunity Program
- Commodities
- Light the Night
- Fatherhood Initiative
- Section 3 Registration
- Family Self Sufficiency (FSS) Program

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No

### **Plan to remove the ‘troubled’ designation**

N/A

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

Hurdles to affordable housing include high land development costs in underdeveloped areas of the city; rehabilitation cost to bring units up to code; and poor property maintenance, which results in loss of viable housing stock through dilapidation. These conditions can restrict opportunities for LMI individuals, impose higher costs of homeownership and maintenance, and reduce the range of housing choices in many neighborhoods. Suitable infrastructure is widely available in most sections of the city, but continued code enforcement efforts are needed to keep the current affordable housing stock in usable condition and stabilize neighborhoods.

Standards in the Planning and Zoning code also affect affordable housing. Code requirements applied to non-single-family residences can impede the provision of affordable, accessible housing inside and outside of the City. Examples of such code requirements are: additional spacing, landscaping, architectural design and parking. Several challenges have been posed by facilities that felt they experienced an undue burden due to regulations that seem overly burdensome to or even discriminatory.

The Planning and Zoning Code also regulates intensity and density. For each of the respective zoning districts, overlay zones, and their respective uses; the maximum number of dwelling units, minimum setbacks, floor area ratios, and individual parcel characteristics determine the permissible density of development. How such standards affect affordability depends on the area in question as well as the participation of stakeholders in the planning process. For instance, many acknowledge the common occurrence of the prohibition of multi-family and group housing in the townships surrounding Toledo; such denial of permission is often, unfortunately, due to the vocal opposition of local residents and/or future, potential neighbors who view the use as undesirable. Inclusionary zoning, which can be effective just about anywhere that is experiencing a shortage of affordable housing, would address issues in Toledo such as shortages of affordable housing in certain communities and resistance to the siting of group living facilities and homes for those who are re-entering or who are recovering from substance abuse.

The State's homestead tax exemption also has a significant effect on the affordability of housing for qualifying homeowners. Beginning in 2014, income requirements apply to new recipients, making the exemption more restrictive. New recipients are eligible only if their income is equal to or less than the amount prescribed by State law. Although local taxing authorities do not lose funds as a result of this, recent changes in the homestead laws shift the burden of property tax from the State of Ohio to local homeowners.

## **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

The development of the Analysis of Impediments to Fair Housing provided the framework for the development of the Fair Housing Action Plan. This plan identifies goals/objectives and action steps to implement strategies to remove barriers to fair housing.

In conjunction with representatives from the City of Toledo, the Center identified 20 areas that require particular attention and action in order to remedy impediments to fair housing. They are as follows:

- Rental
- Economic, Employment, and Transportation Issues
- Assisted Housing
- Housing Mobility and Expanding Housing Choice
- Source-of-income Protection
- Reentry and Housing
- Homeless Services
- Advertising
- New Immigrant Issues
- Housing for Persons with Disabilities
- Real Estate Sales
- Zoning Regulations and Occupancy Standards
- Other Local Public Policies that Affect Housing Choice
- Lead Poisoning
- Foreclosure
- Real-estate Owned Properties
- Homeowners' and Habitational Insurance
- Lending
- Fair Housing Awareness
- Appraisal

The impediment areas above are those for which the Center and the City have determined goals, action steps, timelines, and the parties primarily accountable for the actions. The following pages summarize the action steps identified in the Fair Housing Plan as they relate to removing barriers to affordable housing.

Impediment Area	Goals/ Objectives	Action Steps	Primary Responsibilities/ Potential Partners	Timeline
Rental	Encourage development of safe and affordable housing in high opportunity areas.	Review proposals to develop new low-income housing units in the greater Toledo area and discuss fair housing implications of developments. When a developer requests support from local government, including the City of Toledo, regarding the development of Low-Income Housing Tax Credit housing or other subsidized housing, the local government will discuss the proposal with the Fair Housing Implementation Council and review the fair housing implications of such development.	<b>TFHC, ABLE, City of Toledo, Fair Housing Implementation Council</b>	Ongoing
Economic, Employment, & Transportation	Promote and ensure access to regional transportation.	Community Advocates for Transportation Rights (CATR) and TFHC will work together to discourage efforts of local communities to withdraw from TARTA services unless an equivalent or better service is proposed in its place and to encourage those communities that have withdrawn to connect with the regional transportation network.	<b>TFHC, CATR, Ability Center, TLCCOD</b>	Ongoing
Assisted Housing	Expand availability of Section 8 housing.	Effectively market the Section 8 program and its benefits to landlords.	<b>LMHA, TFHC</b>	Ongoing
Assisted Housing	Expand availability of Section 8 housing.	Encourage HUD and local jurisdictions to provide sufficient funding to allow LMHA to properly carry out the voucher and mobility programs, as described further below.	<b>TFHC, LMHA, Cities of Toledo and Oregon, Lucas County, ABLE</b>	Ongoing

Housing Mobility	Establish and implement a mobility program.	LMHA will implement a mobility program based on the Poverty Race Research Action Council's publication "Expanding Choice: Practical Strategies for Building a Successful Housing Mobility Program," and move at least fifty families through the program by the end of the five-year period of this Analysis of Impediments. The mobility program will include landlord development, target population outreach, pre-search counseling, housing search assistance, and post-move support, as described in PRRAC's publication.	<b>TFHC, LMHA, ABLE, TLCHB, Lucas County</b>	Within five years
Source-of-income Protection	Add Source of Income to the current list of protected classes at the City level.	TFHC and ABLE will meet with the City to consider proposed legislative changes and will advocate for the inclusion of source of income as a protected class in the City of Toledo's municipal code.	<b>TFHC, ABLE, City of Toledo</b>	Within first year
Reentry and Housing	Promote access of the re-entry population to assisted housing opportunities.	Review current policies and discuss the feasibility of floating set-aside units/vouchers for people re-entering society as well as the development of distinct criteria for different offenses. Implement the changes proposed by Reentry Coalition and TFHC to the ACOP and letters and advocate for similar changes by other assisted housing providers. Advocate for similar changes in other assisted housing policies.	<b>TFHC, Reentry Coalition, LMHA</b>	Ongoing

## **SP-60 Homelessness Strategy – 91.215(d)**

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

The City of Toledo has a strong homeless response system and continues to work closely with local homelessness service provider agencies to strengthen system access and service delivery through implementation of HUD's goals and outcomes outlined in the HEARTH Act and under the Emergency Solutions Grant and Continuum of Care regulations. Annual point-in-time counts indicate that Toledo does not have a large number of unsheltered persons in need of homeless services. Nonetheless, Neighborhood Properties Inc. provides outreach services to vulnerable individuals through their Projects for Assistance in Transition from Homelessness (PATH) program. The local coordinated assessment system will continue to work with PATH staff to identify individuals in need and offer immediate practical assistance as well as long-term intensive support.

### **Addressing the emergency and transitional housing needs of homeless persons**

Emergency Solutions Grant funds will continue to support local homeless service providers who intend to provide eligible services under current federal regulations. Activities may include but are not limited to emergency shelter operations, coordinated assessment through United Way 2-1-1, direct financial assistance for permanent housing, and administration of the local Homeless Management Information System. Homeless service providers funded by the City of Toledo and the Toledo Lucas County Homelessness Board will have their performance reviewed and evaluated in accordance with local Continuum of Care key performance indicators. Set by community providers, these performance measures are reviewed and revised on an annual basis.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

The City of Toledo and Toledo Lucas County Homelessness Board will seek to expand the availability of rapid rehousing units for singles and permanent supportive housing units for families. This will eventually shorten the period of time that individuals and families experience homelessness as well as reduce the number of chronically homeless in our community. Homeless prevention activities will begin when individuals call 2-1-1 and state that they are in a housing crisis. Coordinated Assessment will work with clients to evaluate the safety and appropriateness of their housing options. Diversion activities by will be critical If homelessness is unavoidable, Coordinated Assessment will connect clients to emergency shelter services. Once at shelter, residents will be assessed by trained case managers using the Service Prioritization Decision Assistance Tool (SPDAT). Developed by OrgCode Consulting, the

evidence-informed tool is already integrated with the local HMIS system and is continuously reviewed and revised with input from users. This will allow homeless service providers accurately assess clients' needs and help them access the programs and services that will assist them in ending their homelessness.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The Toledo Lucas County CoC utilizes various partner agencies in preventing homelessness for our community members. When someone contacts any homeless service provider, they are referred to the local United Way 2-1-1 system. The 2-1-1 staff are trained to identify housing or other urgent needs and refer the call to the appropriate department within the United Way system. For those that identify housing as a need, the caller is referred to the coordinated access (CA) staff for further work on prevention and diversion. If the staff are unable to find alternatives to entering a state of homelessness, they will refer the caller to the most appropriate emergency housing that has bed availability.

For those that are being “discharged” from an institution, the CoC works to ensure the institution has plans in effect that require effective pre-discharge planning surrounding housing. However, some regulatory issues may cause the institution to discharge and individual into a state of homelessness. In this rare instance, the individual is connected to the United Way through 2-1-1 for engagement in the rapid re-housing process.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The City of Toledo continues its commitment to providing lead-safe, decent, safe and sanitary housing for eligible families. This effort uses a highly coordinated network consisting of private health officials, community development corporations, LMHA, social service agencies, and other city departments. 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.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

The City of Toledo, Department of Neighborhood Housing Division, administers the owner-occupied and rental rehabilitation program as well as a CHDO program. These programs are required to incorporate lead assessments on any unit evaluated by the Department of Neighborhood's programs. Properties where lead hazards are discovered are abated through the use of State licensed lead abatement contractors, in accordance with federal regulations. State Lead Licensed personnel conduct the assessment. In addition, for PY 2014, the Department of Neighborhood continues to include, as part of its HOME-funded homeowner activities, lead rehabilitation to LMI households. The Department of Neighborhood addresses units that may not be otherwise eligible for Lead Hazard Reduction Grant programs.

According to The Ohio Department of Health Website, The City of Toledo is one of the top three cities in the State of Ohio for childhood lead poisoning. Although the results over the years have shown a decline in elevated levels through the efforts made possible through funding from the HUD Lead Hazard Control grants, the results are still bleak. Currently, over 20,337 children under the age of 6 years in the City of Toledo. In the past 17 years (1997-2013), 90,168 children under 72 months of age have undergone lead screenings. A total of 6,167 (6.8%) children from 1997-2013 has had results with an elevated blood level. (2014, October 1). Retrieved from [http://www.odh.ohio.gov/odhPrograms/cfhs/lead\\_ch/lead\\_data.aspx](http://www.odh.ohio.gov/odhPrograms/cfhs/lead_ch/lead_data.aspx).

The City of Toledo successfully planned, designed and implemented four previous Lead Hazard Reduction Programs, successfully managing grants totaling \$9.2 million, resulting in over 1,200 units of lead-safe housing units since 1994.

### **How are the actions listed above integrated into housing policies and procedures?**

All residential homes that receive down-payment assistance through HOME funds are also assessed visually for lead hazards. Homes where lead hazards exist must be made lead-safe prior to finalization of the sale. Efforts addressing lead-based paint hazards are essential, especially when targeting rehabilitation projects in the central city neighborhoods.

On November 28, 2012, the City of Toledo Department of Neighborhood entered into a contract with the Lucas County Regional Health District in order to administer and manage their Lead-Based Paint Hazard Control Program (LBPHCP). Acting as a sub-grantee, the Department of Neighborhood is providing interim control lead abatement and clearance of 165 housing units through June 30, 2015.

Funding for the LBPHCP was received from HUD's Office of Healthy Homes and Lead Hazard Control, which provides financial assistance to help reduce lead paint hazards in residential units located in the City of Toledo.

Assistance is provided to qualified homeowners and landlords in the form of a grant, with the highest priority given to units occupied by children under the age of six or at least one pregnant female.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

The goals of this Consolidated and Action Plans are aimed at reducing the number of poverty-level families in Toledo. Among the leader organizations working to address poverty is the United Way of Greater Toledo. United Way envisions a community where all individuals and families achieve their human potential through education, income stability, and healthy lives.

The Department of Neighborhoods engages in housing development and improvement programs in the community that assist in reducing the number of families living at the poverty level. Housing programs are designed to have a positive effect in individuals and families and the community as a whole in the following areas:

- economic development (creation or retention of businesses and jobs in the construction and finance industries and other industries that indirectly benefit from increased business);
- stabilization of families (providing or maintaining adequate affordable housing);
- health improvement (elimination of lead, mold, and other health hazards such as electrical, ventilation and other issues resulting from an aging housing stock and limited maintenance)
- home ownership increase; and,
- community growth by making Toledo more attractive to business and individual investments

Through the Citizens Participation Process of this plan, the 2014-20105 CDBG and ESG recipients identified some of the programs already in place to assist in reducing the number of poverty- level families in Toledo:

- Community gardens
- Science, Technology, Engineering and Math Education (STEM) Study Island Tutoring program
- Sport programs
- Health by Choice - 50 families working with the Toledo Metropolitan Area Council of Governments bringing community people into beautification projects
- Parenting program
- Teens volunteer in a safe environment to learn construction trades and skills (selected through schools)
- Programs at different schools for K-6 graders

These programs are a small representation of the many programs that develop life-skills that contribute to the reduction of poverty-level families in Toledo. The City is a partner at many of these programs and targets resources that when leveraged with other resources make a significant impact in the reduction of poverty. Additionally, organizations like ProMedica, Mercy Hospital and community development organizations partner with organizations to geographically target specific low-income and depressed areas of the City. Often times, the Department of Neighborhoods participates in those partnerships.

**How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

The goals of this plan are aligned with assisting low-income persons in the areas of housing and basic needs. All goals are addressing issues related to reducing poverty in Toledo.

## **SP-80 Monitoring – 91.230**

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

The Department of Neighborhoods oversees compliance for CDBG, ESG, HOME and NSP. Written agreements with partners or beneficiaries are executed based on eligible projects. Monitoring of CDBG and ESG partners includes review 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.

In regards to HOME, the Department ensures compliance through the completion of the units and the affordability period. HOME written agreements verify: type of assistance, number of units, construction schedule, use of funds, budget, recapture guidelines, reversion of assets, affirmatively furthering fair housing, disbursement methods, repayments (as applicable), uniform administrative requirements, Davis-Bacon applicability, Section 3 applicability, and record keeping and retention. Department staff conducts annual reviews of projects during the period of affordability. Monitoring and Housing Quality Standards (HQS) inspections for rental projects are conducted in one, two or three year intervals depending on the number of HOME units assisted. A desk audit is conducted at least annually to ensure that the most current HUD Income Limits, Utility Allowances, and Low/High Rents are being utilized. Compliance for rental units consist of: property standards; rent and occupancy requirements; lease requirements; and, tenant selection policies.

For the owner-occupied program, each recipient must remain in the unit for a period of 10 years to be eligible for forgiveness of the loan. This deferred loan is subject to recapture if the owner no longer occupies the unit. The owner must attest to their residency in the unit annually through documentation submitted.

Similar monitoring is also applied to the NSP projects.

For the Tenant Based Rental Assistance program, recertification is obtained every three months. Participants residing in the same unit after one year will also receive an annual HQS inspection, as applicable.

Minority Outreach Program - The Department of Neighborhoods' bid procedure models the procedure of the City's Purchasing Division. While the City's Purchasing Division handles all City bids, the Department's bids are handled by the department. Bids are limited to the procurement of construction contracts for the rehabilitation or construction of new housing in low-income neighborhoods, using federal funds. The Department conducts forums and informational meetings to recruit and retain

qualified contractors. Once construction specifications are approved, a bid package is prepared consisting of the following documents: "Invitation to Bid" Cover Page; set of specifications and special trades; bid proposal summary sheet; statement of Non-collusion; contractor/subcontractor and minority report; Minority Business Enterprise (MBE)/Women Business Enterprise (WBE) Commitment Affidavit; and, Best Bid Criteria Affidavit.

For bids under \$10,000, the bid packet is e-mailed with project estimates attached to the list of licensed remodeling contractors, and professional and minority associations. For bids of \$10,000 or more, the bid package is entered into the City's financial system as a purchase requisition and then posted on the Department of Neighborhoods' web page. Bids \$40,000 or above are also posted in the Toledo City Journal.