

Substantial Amendment

to Action Plan

25th PY

2nd Allocation
Emergency Shelter Grant
Renamed Emergency Solutions Grant

July 1, 2011 to June 30, 2012

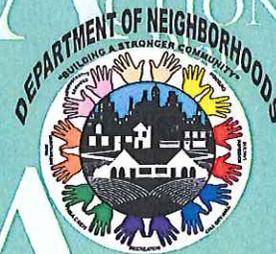


Michael P. Bell, Mayor
Lourdes Santiago, Director
Department of Neighborhoods
One Government Center
Suite 1800

Toledo, Ohio 43604

(419) 245-1400

Fax (419) 245-1192



CITY OF TOLEDO



Department of Neighborhoods

May 14, 2012

Ms. Jorgelle Lawson, Director
Office of Community Planning and Development
U.S. Department of Housing and Urban Development
Ohio State Office
200 North High Street
Columbus, OH 43215-2499

Dear Ms. Lawson:

Enclosed are the original and five (5) copies of the City of Toledo's Substantial Amendment to the 2011-2012 One-Year Action Plan for the Emergency Solutions Grant (ESG). As part of this program, the provision of homelessness prevention and rapid re-housing activities shall be undertaken, including housing stabilization services for individuals and families at imminent risk of becoming homeless.

If there are any questions concerning the submission of this plan, please contact me at (419) 936-3647.

Respectfully,

Lourdes Santiago
Director

LS:slt
Enclosures

CITY OF TOLEDO



OHIO

SUBSTANTIAL AMENDMENT

to

Action Plan

25th PY

2nd ALLOCATION

EMERGENCY SHELTER GRANT

RENAMED EMERGENCY SOLUTIONS

GRANT

Application for Federal Assistance SF-424

Version 02

*1. Type of Submission:

- Preapplication
- Application
- Changed/Corrected Application

*2. Type of Application

- New
- Continuation
- Revision

* If Revision, select appropriate letter(s)

*Other (Specify)

3. Date Received:

4. Applicant Identifier:

34-6401447

5a. Federal Entity Identifier:

34-6401447

*5b. Federal Award Identifier:

--

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*a. Legal Name: City of Toledo, Department of Neighborhoods

*b. Employer/Taxpayer Identification Number (EIN/TIN):

34-6401447

*c. Organizational DUNS:

099962052

d. Address:

*Street 1: One Government Center, Suite 1800

Street 2: _____

*City: Toledo

County: Lucas

*State: Ohio

Province: _____

*Country: U.S.A.

*Zip / Postal Code 43604

e. Organizational Unit:

Department Name:

Neighborhoods

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms. *First Name: Lourdes

Middle Name: _____

*Last Name: Santiago

Suffix: _____

Title: Director, Department of Neighborhoods

Organizational Affiliation:

*Telephone Number: (419) 936-3647

Fax Number: (419) 245-1413

*Email: lourdes.santiago@toledo.oh.gov

Application for Federal Assistance SF-424

Version 02

***9. Type of Applicant 1: Select Applicant Type:**

C. City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231 _____

CFDA Title:

Emergency Solutions Grants program (ESG) _____

***12 Funding Opportunity Number:**

*Title:

Funding Availability for the Emergency Solutions Grants (ESG) program _____

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

City of Toledo

***15. Descriptive Title of Applicant's Project:**

The provision of homelessness prevention, rapid re-housing, and housing stabilization activities.

Application for Federal Assistance SF-424 Version 02

16. Congressional Districts Of:
*a. Applicant: Ninth Ohio District *b. Program/Project: Ninth Ohio District

17. Proposed Project:
*a. Start Date: 7/1/12 *b. End Date: 6/30/13

18. Estimated Funding (\$):

*a. Federal	199,675.00
*b. Applicant	_____
*c. State	_____
*d. Local	_____
*e. Other	_____
*f. Program Income	_____
*g. TOTAL	199,675.00

*19. Is Application Subject to Review By State Under Executive Order 12372 Process?
 a. This application was made available to the State under the Executive Order 12372 Process for review on _____
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.
 c. Program is not covered by E. O. 12372

*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)
 Yes No

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)
 ** I AGREE
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

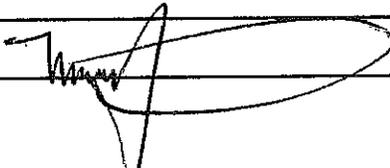
Authorized Representative:

Prefix: Mr. *First Name: Michael
Middle Name: P.
*Last Name: Bell
Suffix: _____

*Title: Mayor, City of Toledo

*Telephone Number: (419) 245-1001 Fax Number: (419) 245-1370

*Email: mayor.toledo@toledo.oh.gov

*Signature of Authorized Representative: X  *Date Signed: 5/10/12

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.

INTRODUCTION

This Substantial Amendment was prepared per 24 CFR part 91, following the outline delineated below.

A. Requirements for Preparing the Substantial Amendment to the FY 2011 Consolidated Plan Annual Action Plan.

1. Consultation
2. Citizen Participation

B. Required Contents of Substantial Amendments

1. Standard Form 424
2. Summary of Consultation Process
3. Summary of Citizen Participation Process
4. Match
5. Proposed Activities and Overall Budget
6. Written Standards for Provision of ESG Assistance
7. Making Sub-Awards
8. Homeless Participation Requirement
9. Performance Standards
10. Certifications

C. Written Standards Required for Recipients Who Are Eligible and Decide to Use Part of the Second Allocation of FY 2011 Funds for Emergency Shelter and Street Outreach Activities

A. Requirements for Preparing the Substantial Amendment to the FY2011

1. Consultation
2. Citizen Participation

B. Required Contents of Substantial Amendment

1. The HUD form SF - 424 is attached to the final submission of the amendment.
2. **SUMMARY OF CONSULTATION PROCESS**
 - Consult with the CoC
 - Determining how to allocate ESG funds to eligible activities
 - Developing the performance standards for activities funded under ESG
 - Developing funding, policies, and procedure for the operation and administration of the HMIS
3. **SUMMARY OF CITIZENS PARTICIPATION PROCESS**
 - Summarize citizen participation process used
 - Summarize the public comments or views received
 - Summarize the comments or views not accepted and include the reasons for not accepting those comments or views

Consultation with Continuum of Care

The City of Toledo has partnered with the Toledo Lucas County Homelessness Board (TLCHB) since 2005 to ensure an ongoing and strengthened Toledo Lucas County Continuum of Care (CoC). TLCHB is the lead entity of the CoC.

The primary mission of the CoC is to evaluate and focus the resources of the community on homeless individuals and families. This substantial amendment to the 25th PY Emergency Solutions Grants (ESG) will allow the community to continue to fund programs leading to Rapid Re-Housing and Homelessness Prevention to conform with the most recent HUD national objectives regarding the re-named Emergency Solutions Grant.

The City of Toledo Department of Neighborhoods (DON) has conducted many meetings and other forums with TLCHB and its CoC agencies in preparing this Substantial Amendment. TLCHB is the city's key partner in the community's Homeless Prevention and Rapid Re-Housing Project (HPRP), which was implemented as a collaborative effort in October 2009.

As the HUD HPRP grantee and fiscal agent, DON performs oversight and monitoring, executes contracts, disburses financial assistance payments, and in cooperation with TLCHB Homeless Management Information System (HMIS) staff, submits federal quarterly and annual reports.

TLCHB oversees and manages the project's service delivery conducted through the services of eight CoC agencies. A program team made up of management representatives of the major HPRP components - Centralized Intake, Case Management Coordination, Housing Placement Assistance and HMIS meet regularly to review and direct program delivery elements and recommend project revisions to the DON and TLCHB as warranted.

One of the main tenets of the collaborative approach to implementation of the HPRP project was to pilot a model of effective and efficient delivery of rapid transition to housing (RH) for families and individuals experiencing homelessness and near homelessness, and to provide housing stability services to those households who would be homeless without prevention assistance (HP). The success of HPRP coupled with lessons learned has greatly informed the proposed activities, performance standards and allocation of funds vis-a-vis this substantial amendment.

In addition, the Department of Neighborhoods (DON) in partnership with TLCHB, conducted a CoC community wide meeting April 4, 2012 to discuss and garner input on the proposed substantial amendment. There were 31 organizations represented.

Allocation of Funds

The housing needs for prevention and rapid re-housing of clients in our community remain significant prompting the 50/50 split of funds between these components, resulting in a 20% increase on rapid transition to housing.

United Way of Greater Toledo reports over 750 requests for rental and deposit assistance in the last six months. United Way also reported over 900 calls requesting shelter assistance, of which 329 referrals were made to HPRP.

Through January 2012, the HPRP program has served 651 households with prevention assistance with 524 (81.5%) exiting to permanent housing. In addition, 102 homeless individuals were provided rapid re-housing assistance with 66% exiting to permanent housing.

HMIS reports that the average number of months of service for prevention and housing placement households exiting to permanent housing has been six months with an HP average of \$423 and an RH average of \$363 monthly direct financial assistance.

Based upon HMIS data and projections, the funds allocated will serve 25 HP households and 25 RH households with financial assistance and housing stabilization services. An additional 30 households will be assisted with diversion and stabilization services.

Homeless Management Information System

The Toledo HMIS, implemented in November 2004, continues to collect and enter data on homeless individuals. There is no single point of entry for HMIS. An administrator oversees the process and provides technical support for operations promoting collaborative efforts among service providers. HMIS policies and procedures are in place and current with HUD requirements. Also, for the past three years, Toledo has participated in the Annual Homeless Assessment Report (AHAR).

Citizen Participation

In accordance with HUD federal regulations CFR 91.105 and 91.200, the City of Toledo maintains a Citizen's Participation Plan (CPP). This plan was amended in June 2009. The CPP ensures that the City of Toledo solicits and utilizes input from citizens, community agencies and beneficiaries, allowing full participation at all levels such that allocation and utilization of HUD funds are conducted in an open manner with freedom of access for all interested individuals. See schedule below.

Emergency Solutions Grant (ESG) 2011 Substantial Amendment time line

Wed., 3/21/12	Submit Public Notice to the <i>Toledo Free Press</i> , <i>The Toledo Journal</i> , and <i>La Prensa</i> periodicals for ESG Substantial Amendment
Sun., 3/25/12	Public Notice appears in the Sunday edition of the <i>Toledo Free Press</i> periodical
Wed., 3/28/12	Public Notice appears in the weekly editions of <i>The Toledo Journal</i> and <i>La Prensa</i> periodicals
Wed., 4/4/12	Community meeting on the ESG Substantial Amendment with CoC partners at United Way, Rms A & B, 1:00 to 3:00 p.m.
Thurs., 4/5/12	Deliver ESG Substantial Amendment to designated sites
Mon., 4/9/12	30-day comment period begins
Thurs., 4/19/12 4:00 p.m.	City Council Public hearing on ESG Substantial Amendment
Wed., 4/25/12 (before noon)	Submit legislation to City Council
Tues., 5/1/12	Public Meeting at Agenda Review before City Council
Tues., 5/8/12	30-day comment period ends
Tues., 5/8/12	City Council 1st reading and passage (due to a delay in notification of the City of Toledo's entitlement allocation, an opportunity for a 2nd reading will not be available)
Mon., 5/14/12	Submit ESG Substantial Amendment to HUD

The City of Toledo has accepted all written comments as to the content of the substantial amendment and incorporated same to this document.

4. MATCH

- Describe the type of cash and/or non-cash resources used as match
- Specific amounts of resources used as match
- Proposed use of match resources

The City of Toledo intends to match the ESG Substantial Amendment of \$199,675 through the following:

State of Ohio, Ohio Department of Development (ODOD) -- \$123,500
 City of Toledo, Department of Neighborhoods (CDBG) -- \$46,675
 Foundation & non-profit entities -- \$29,500

5. PROPOSED ACTIVITIES AND OVERALL BUDGET

All recipients must include the following details for each proposed activity:

- 1) Corresponding priority needs from recipient's Annual Action Plan

- 2) Concise description of the activity, including the number and types of individuals to be served
- 3) Corresponding standard objective and outcome categories
- 4) Start date and completion date
- 5) ESG and other funding amounts
- 6) One or more performance indicators
- 7) Projected accomplishments, in accordance with each indicator, to be made within a year
- 8) Projected accomplishments, in accordance with each performance indicator, to be made over the period for which the grant will be used for that activity.

As indicated above, this ESG Substantial Amendment will accomplish a major step toward the transition leading to improved resources as follows:

- 1) Rapid Re-Housing
- 2) Homeless Prevention
- 3) Coordinated Entry

The budget chart below depicts the activities and the amount to be dedicated to each activity.

	Re-Housing	Homelessness Prevention	Total Amount Budgeted
Financial Assistance	\$66,342	\$66,342	\$132,684
Housing Relocation & Stabilization Services ¹	\$29,765		\$29,765
Subtotal	\$95,795	\$66,030	\$162,449
Data Collection ²			\$22,250
Administration			\$14,976
Total			\$199,675
Services Budget			
Tenant Based Rental Assistance	\$49,300	\$58,600	\$107,900
Other Financial Services ³	\$17,042	\$7,742	\$24,784
Total	\$66,342	\$66,342	\$132,684

NOTES:

1. Housing Stabilization dollars associated with HP and services will be provided by a match entity to be determined through the RFP process.
2. Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless individuals and analyzing patterns of use.
3. Housing relocation and stabilization services include the following activities as detailed in the ESG Substantial Amendment Notice: outreach, intake & enrollment services; case management; housing search and placement; legal services, mediation, and credit repair.

Goals and Activities

For the program year 2011-2012, the second year of its five-year plan, the City of Toledo prioritized goals according to community need taking into consideration whether the goal is a critical need and/or a recently emerging issue (i.e. foreclosure).

Using the operational goals as references, objectives have been established according to ranking within each category according to high, medium, lower, or lowest priority. The City of Toledo's 2011-12 Action Plan identifies Priority Operational Goal 4, Eliminate Homelessness, a medium priority within the 5-year Consolidated Plan adopted on May 13, 2010. This goal focuses on the four major goals of the Community Alliances and Strategic Efforts (CASE) Plan to Prevent, Reduce, and End Homelessness in Toledo and Lucas County, Ohio. They are: a) Homeless Prevention; b) Coordinated homeless services; c) Sufficient affordable housing; and d) Community engagement, coordination, and oversight. This goal includes utilization of HMIS, and maximizing partnerships with existing mainstream community resources.

The Priority Program Goal 4, Eliminate Homelessness in the Action Plan 2012-2013 outlines objectives, indicators and outcomes. The City of Toledo's ESG Substantial Amendment Homeless Prevention and Rapid Re-housing Assistance activities are consistent and build upon both the Consolidated Plan and Action Plan.

The activities funded by the ESG Substantial Amendment will begin July 1, 2012 and conclude December 31, 2012. Rapid Re-housing and Prevention Activities will continue beyond December 31, 2012 utilizing FY 2012 ESG 26th PY funds. These activities will be delivered through a collaborative effort similar to the current HPRP project under the program management of the TLCHB and the oversight of DON.

- A. Rapid Re-Housing: Housing stabilization services and financial assistance to eligible applicants who are experiencing homelessness to be quickly re-housed and stabilized.

Objective	Outcome Indicator	Outcomes	ESG Funds	Other Funds
Provision of up to six months of housing stabilization services to individual and family households who are experiencing homelessness (Suitable Living Environment)	160 persons	66% receiving stabilization services will exit program remaining in permanent housing	\$29,765	\$49,665
Provision of up to six months of direct financial assistance to individual and family households who are experiencing homelessness (Suitable Living Environment)	100 persons	66% receiving stabilization services will exit program remaining in permanent housing	\$66,342	\$8,970

B. Prevention: Housing stabilization services and financial assistance to eligible applicants who are at imminent risk of becoming homeless to be quickly stabilized and remain in permanent housing

Objective	Outcome Indicator	Outcomes	ESG Funds	Other Funds
Provision of up to six months of housing stabilization services to individual and family households at imminent risk of becoming homeless (Suitable Living Environment)	160 persons	80% receiving stabilization services will exit program remaining in permanent housing		\$79,165
Provision of up to six months of direct financial assistance to individual and family households who are experiencing homelessness (Suitable Living Environment)	100 persons	80% receiving stabilization services will exit program remaining in permanent housing	\$66,342	\$8,970

6. WRITTEN STANDARDS FOR PROVISION OF ESG ASSISTANCE

The standards shall conform to those established within the current Policies and Procedures Manual on Homelessness Prevention and Rapid Re-Housing Program (HPRP), including those HPRP specific requirements noted below, and modified according to HUD ESG regulations. DON, in consultation with TLCHB and current HPRP recipients, shall finalize the written standards. The City of Toledo will require all ESG awardees and ESG Substantial Amendment awardees to follow written standards prior to executing the subrecipient agreement.

Standards modifications will include a more defined determination of:

- the share of rent and utility costs each program participant must pay, if any while receiving homelessness prevention or rapid re-housing assistance,
- prioritizing which eligible families and individuals will receive prevention or rapid re-housing assistance

Similar to the current HPRP practices, access to the services provided by the ESG Substantial Amendment will be through a centralized intake and enrollment process. Enrolled participants will be assigned to stabilization services partners and financial services will be processed by TLCHB and submitted to DON for payment.

Current HPRP specific requirements include:

Financial assistance limited to the following: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving costs assistance and motel and hotel vouchers. Payments are only payable to third parties, i.e. landlords or utility

companies.

Housing relocation and stabilization services center on assistance to program participants and are limited to case management, outreach and engagement, housing search and placement, legal services, and credit repair.

Data collection activities involve operating an HMIS for purposes of collecting and reporting data and analyzing patterns of HPRP use. Administrative reimbursement is eligible for pre-award costs, accounting, preparing reports, obtaining audits, and other similar costs related to administering the grant.

Certain activities are specifically prohibited and ineligible, including but not limited to mortgage costs for homeowners, consumer debt, car repair, home furnishing, medical, and work or education-related materials.

HPRP eligibility requirements stipulate that the household must be at or below 50 percent of AMI. ESG eligibility will only be 30 percent AMI.

In addition, any individual or family provided with financial assistance must have an initial consultation with a case manager or authorized representative to determine the appropriate type of assistance warranted. The household must be either homeless or at risk of losing housing and meet the following circumstance: no appropriate subsequent housing options have been identified, and the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing.

In addition, the City of Toledo and TLCHB stipulated that all households must meet at least one of the following eight selected additional criteria:

- Eviction within one (1) week from a private dwelling (including housing provided by family or friends); [ESG will require two (2) weeks time period]
- Severe rental cost burden (paying more than 50 percent of income for rent and utilities);
- Pending foreclosure of rental housing;
- Sudden and significant loss of income;
- Recent traumatic life event, such as death of spouse or primary care provider, or recent health crisis that prevented the household from meeting its financial obligations;
- Significant amount of medical debt;
- Youth with past or current involvement with the foster care system; or
- Past institutional care (prison, treatment facility, hospital).

Emergency Shelter and Street Outreach will not be funded with the ESG Substantial Amendment.

The City of Toledo does not plan to use the Risk Factor under the “at Risk of Homelessness” Definition.

The City of Toledo is a partner with TLCHB and the CoC who will coordinate a centralized intake which will evolve into the coordinated entry system for the homeless and near homeless.

The City of Toledo, DON will monitor all projects funded through ESG and the ESG Substantial Amendment through monthly reviews of the activities and results of TLCHB administration of the subgrantees. TLCHB will monitor all funded activities to subrecipients under the guidance of the DON.

Performance Standards

Performance standards used to evaluate the ESG subrecipient success will be measured against the following Toledo Lucas County CoC indicators:

- Shelter discharge to permanent housing: Target 50%
- Prevention and Re-housing program exits discharge to permanent housing: Target 85%
- Families experiencing homeless: Target 90 entering shelter/transitional housing FY2012
- Multiple shelter stays in a given period: Target 15%

In addition, the CoC is developing target measures for the following indicators:

- Shortening time spent homeless: measuring length of stay (shelter, rapid re-housing, prevention)
- Income improvement
- Employment at exit from shelter, rapid re-housing, and prevention programs

WRITTEN STANDARDS

- *If the recipient is a metropolitan city, urban county, or territory: include written standards for providing the proposed assistance.*

The City of Toledo will require all ESG awardees and ESG Substantial Amendment awardees to follow written standards prior to executing the subrecipient agreement. The standards shall conform to those established within the current procedures in the Manual on Homelessness Prevention and Rapid Re-Housing Program (HPRP), and modified according to HUD ESG regulations.

7. MAKING SUB-AWARDS

The sub-awards will be made after substantial community input. The sub-awards will be focused on the priorities noted above.

- The public was given notice of the substantial amendment and their input was encouraged through newspapers, e-mail, web site, and community meetings.
- The public notice for mandatory training has been provided for anyone wishing to respond to the Request for Proposal to participate.
- Citizens review committee will evaluate all applications and recommend an award to the City of Toledo.
- Subgrantees will be selected and contracts awarded by the City of Toledo.

8. HOMELESS PARTICIPATION REQUIREMENT

The goal is that all recipients will meet the participation requirements. For those not able to meet the participation requirements, a detailed explanation must be submitted for City of Toledo's consideration. For those recipients who cannot meet the participation requirements in Subsection 576.405(a), the substantial amendment must include a plan that meets the requirements under Subsection 576.405(b).

9. PERFORMANCE STANDARDS

The performance standards for evaluation ESG activities are as described above. All standards were developed in consultation with the CoC.

10. CERTIFICATIONS

Refer to Appendix C – Certifications

C. Written Standards Required for Recipients Who Are Eligible

The City of Toledo is a partner with TLCHB and the CoC utilization of a centralized intake process for homelessness prevention and re-housing activities. This effort will evolve into a community-wide coordinated entry system for those experiencing homelessness and near homeless receiving shelter and other essential services.

CERTIFICATIONS

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about -
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2012 , 2013 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

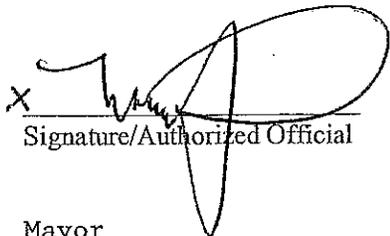
jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.

x  _____
Signature/Authorized Official Date

5/10/12

Mayor
Title

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

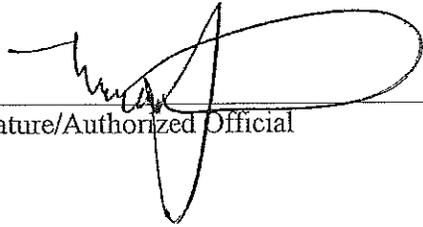
Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

x 

Signature/Authorized Official

5/10/12

Date

Mayor

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

City of Toledo, Department of Neighborhoods
One Government Center, Suite 1800
Toledo, OH 43604

Check if there are workplaces on file that are not identified here.

This information with regard to the drug-free workplace is required by 24 CFR part 21.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

PUBLIC NOTICE
CITY OF TOLEDO
SUBSTANTIAL AMENDMENT TO THE 2011-2012 ONE-YEAR ACTION PLAN

To all interested agencies, groups, and persons:

The City of Toledo is seeking comments on a proposed substantial amendment to its One-Year Action Plan, which is a part of the Five-Year Consolidated Plan for the Emergency Solutions Grant (ESG).

The Substantial Amendment includes a description of available funds from the Department of Housing and Urban Development (HUD) and the eligible uses for the ESG funds. It contains a description of the process to be used and plans for collaboration in undertaking the HUD-established priorities including 1) Homeless Prevention, 2) Rapid Re-Housing, 3) Street Outreach, and 4) Emergency Shelter. In addition, the plan will contain certifications required by HUD.

The draft Substantial Amendment 2011-2012 Action Plan will be available for review and comments beginning Monday, April 9, 2012, on the City of Toledo website: www.toledo.oh.gov, and at the following locations:

- | | | |
|--|---|--|
| 1) Department of Neighborhoods
One Government Center, 18 th Floor
Downtown Toledo, Jackson & Erie | 4) All local branches of the Toledo-Lucas
County Public Library
(Refer to local telephone directory or
toledolibrary.org for locations) | 7) Lucas Metropolitan Housing
Authority
435 Nebraska Avenue
Toledo, Ohio |
| 2) Department of Development
One Government Center, 22 nd Floor
Downtown Toledo, Jackson & Erie | 5) The Ability Center of Greater Toledo
5605 Monroe Street
Sylvania, Ohio | 8) Toledo Lucas County Homelessness
Board
1946 N. 13 th Street, Suite 437
Toledo, Ohio |
| 3) Clerk of Council
One Government Center, 21 st Floor
Downtown Toledo, Jackson & Erie | 6) The Fair Housing Center
432 N. Superior Street
Toledo, Ohio | |

In order to give citizens, public agencies, and interested parties the opportunity for comment, a public hearing has been scheduled for **Thursday, April 19, 2012, beginning at 4:00 p.m. in City Council Chambers.**

The City of Toledo will receive comments from the public for 30 days either through the website at www.toledo.oh.gov, or in writing until Tuesday, May 8, 2012, at the following address:

CITY OF TOLEDO
DEPARTMENT OF NEIGHBORHOODS
SUBSTANTIAL AMENDMENT 2011-2012 ONE-YEAR ACTION PLAN
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604
(419) 245-1400/FAX: (419) 245-1413

Comments received during the 30-day comment period will be included in the substantial amendment submitted to HUD.

*Reasonable accommodations will be provided upon request.

NEIGHBORHOODS, COMMUNITY DEVELOPMENT &
HEALTH COMMITTEE MEETING

Re: Substantial Amendment to the 2011-2012 One-Year Action Plan
for the Emergency Solutions Grant

DATE OF MEETING: Thursday, April 19, 2012
TIME: 4:00 p.m.
CHAIRMAN OF THE MEETING: Councilman Adam Martinez
LOCATION OF MEETING: City Council Chambers
One Government Center
Toledo, OH 43604

MARTINEZ: Good afternoon, it's 4:00. I always try to be respectful of everybody's time, so we try to start on time. A little housekeeping -- if you have your cell phones, please put them on vibrate, and with that, I will call the Neighborhoods, Community Development & Health Committee to order to discuss the Substantial Amendment for the 2011-2012 One-Year Action Plan. Clerk, please call the roll.

DENDINGER: Martinez.
MARTINEZ: Present.
DENDINGER: Hicks-Hudson.
HICKS-HUDSON: Present.
DENDINGER: Copeland. Craig. McNamara. Steel.

1

should be some of the staff for the department -- the Program Monitors and Administrative Analyst that provide oversight of these dollars and how they are to be used within our community, so thank you. If you have any questions, I can entertain those.

MARTINEZ: Great, thank you. I'd like to recognize Councilman Tyrone Riley for his attendance, and Councilwoman Hicks-Hudson.

HICKS-HUDSON: Thank you, Mr. Chair. I appreciate the introduction and I thank you for that. I just need to know the history or the reason as to why there's this bifurcation of this process, whereas we're using a third-party agency to administer federal dollars.

SANTIAGO: We do not...first of all; the Toledo Lucas County Homelessness Board is not a third-party agency that is...provides actual monitoring of these funds. The City of Toledo, Department of Neighborhoods provides the oversight of these funds. Toledo Lucas County Homelessness Board is a partner of the department in addressing the issue of homelessness and what needs to be done in our community.

HICKS-HUDSON: See, I don't under...I...then...to me, then, I'm just trying to understand this association or this confederation, or whatever it is, or association of folks versus the individual actual agencies that do the homeless work and if we're having resources that are...and I don't...that's why I'm asking the question...

SANTIAGO: Sure.

HICKS-HUDSON: ...for an explanation because, you know, in my mind, if we're looking limited resources and limited dollars and you've got this intermediate layer...level -- not layer -- but

3

STEEL: Here.
DENDINGER: Three present.

MARTINEZ: Great, thank you so much for everyone coming to this meeting. Long time no see -- after our marathon meeting yesterday. I sincerely appreciate everyone keeping this at the forefront. The One-Year Action Plan's extremely important to how the CDBG allocation process works and we want to make sure we have ample community input, as well as a very comprehensive plan from the Administration. With that being said, I will turn it over to either Deputy Mayor, or Director Santiago.

CROTHERS: Thank you. I think at this point, we'll turn it right over to Director Lourdes Santiago.

SANTIAGO: Thank you and good afternoon. Today is the hearing on the Action Plan Substantial Amendment. This is to amend the Action Plan that we are currently in due to the fact that HUD provided the City with an additional \$199,000+ under our Emergency Shelter Grant. Again, these dollars were provided because of the HUD focus and redirection of those dollars so much so that they renamed the shelter grant to Emergency Solutions Grant. With us here to explain this process and the focus of the dollars and how they will be used, is our partner in addressing homelessness in the City of Toledo -- Deb Conklin, who is the Executive Director of the Toledo Lucas County Homelessness Board. It is in partnership with the Toledo Lucas County Homelessness Board that the City addresses the issues of homelessness in our city and, therefore, many of the questions you may have today will be answered by her because we consider her the expert in this field. Of course, Bonita Bonds is also here, the Manager of Administrative Services/fiscal oversight for the department, and with her and Deb Conklin, hopefully will be able to answer any questions. In the audience

2

intermediate level of oversight in terms of...you're saying -- expert, and I'm not...and I don't know anything about the agency so I'm not making any disparaging remarks about it, or...because it's not intended, it's just for me to understand...

SANTIAGO: Sure.

HICKS-HUDSON: ...this process because yesterday, there was no...there was not a non-city employee sitting at the table....

SANTIAGO: Sure.

HICKS-HUDSON: ...and I just want to go on record that I always have questions about that when we have folks that are not City employees helping to manage city public dollars.

SANTIAGO: Sure, that's a very valid question, Councilwoman Hicks-Hudson, and I think I will allow Deb Conklin to address that.

HICKS-HUDSON: Okay, appreciate it.

SANTIAGO: But just to make it quite clear, this is a partnership that we have with the Homelessness Board in assisting us in addressing the homelessness issues in our community and, therefore, I want to make it clear that dollars come to the City of Toledo; they're administered by the Department of Neighborhoods. However, based on that long-term relationship and that partnership with the Homelessness Board, and they have certain responsibilities under the Continuum of Care and the HMIS and I think she'll expand on that, the City of Toledo, Department of Neighborhoods has maintained that close partnership because of the expertise that they lend to the department in addressing

4

the homelessness issues in our community, but having said that, I'd like for her to expand on that.

HICKS-HUDSON: Just before you do that, I would just...let me just respond a little bit because I understand what you're saying and, I guess, I'm just wondering about -- when we talk about expertise, are we talking about expertise in policy? Are we talking about expertise in delivery of services? That's my question. And, secondly, are there funds being expended for the services of this partnership that we have with the Toledo Lucas County Homeless Board?

CONKLIN: Homelessness Board.

HICKS-HUDSON: Homelessness Board.

SANTIAGO: They are in charge of the HMIS.

HICKS-HUDSON: Okay.

SANTIAGO: And I'll let her expand, but they do not receive any dollars from us other than that.

CONKLIN: Good afternoon. This is...just to clarify this...this is not the first time that I have sat in this seat over the last five years.

HICKS-HUDSON: It's not the point about...

CONKLIN: Yes.

HICKS-HUDSON: ...what you individually sitting in the seat or not, it's my question as it relates to third parties that are not City employees sitting in the well and it has nothing to do with you.

5

CONKLIN: Okay.

HICKS-HUDSON: ...an infant, and so you're using terms that are conclusory when you talk about collaboration. Who are you collaborating with? Are these the service providers?

CONKLIN: Yes.

HICKS-HUDSON: Okay, and in terms of this collaboration, when you talk about program services...

CONKLIN: Yes.

HICKS-HUDSON: ...what does that mean exactly?

CONKLIN: The Homeless Prevention Rapid Re-housing Program that was made possible with the stimulus money...

HICKS-HUDSON: Okay.

CONKLIN: ... and the supplemental amendment that happened...

HICKS-HUDSON: Okay.

CONKLIN: ...laid out the partnership that would happen with the Homelessness Board in delivering of that.

HICKS-HUDSON: And who...?

CONKLIN: And...

7

CONKLIN: Okay.

HICKS-HUDSON: Okay.

CONKLIN: The Toledo Lucas County Homelessness Board is the lead on the Continuum of Care. The...and we are responsible for the \$4.2M a year that comes into this community for the Supportive Housing Program, so our expertise comes from assuring HUD that we are meeting our objectives for the Continuum of Care. The new Emergency Solution Grant requires that there is an alignment between ESG allocations and the Continuum of Care. I think that sort of explains why this partnership is necessary given that the City of Toledo has served on the board since its inception and is one of its founding partners, it's been very active in its work. The reason why we feel we are an expert in talking about the Substantial Amendment, is to follow up on our work that we have been doing as a partnership with the Homeless Prevention Rapid Re-housing Program, which we combine the State funding that we were responsible for with the City of Toledo funding to create a collaborative delivery of service for rapid re-housing and prevention, so we have the first-hand experience in the community in managing a collaborative effort to prevent homelessness and to rapidly house folks who are homeless. It's been the CASE HPRP program, we have been the program managers with the City of Toledo being the fiscal agent and member of the program team, and we have partnered with our agencies that are delivering on the service and providing that service collaboratively. Did that answer?

HICKS-HUDSON: No.

CONKLIN: Okay.

HICKS-HUDSON: Because I'm a babe, I'm...

6

HICKS-HUDSON: ...and who's...and who is members of this partnership?

CONKLIN: The members of this partnership are the United Way of Greater Toledo, FOCUS, Lutheran Social Services, EOPA -- through December 31, 2011, Toledo Area Ministries -- through December 31, 2011, Toledo...or TASC of Northwest Ohio, and HMIS, which we are the grantee for HMIS.

HICKS-HUDSON: And HMIS stands for?

CONKLIN: Is the Homeless Management Information System. Another major requirement of...to justify and record and submit to HUD the data that they require for us to...not only for us as a community, but it also gives the agencies, through their participation in HMIS, the data and the reporting mechanism they need to report back to HUD for their accomplishments.

HICKS-HUDSON: Okay.

CONKLIN: So we're very...and as I said, we're the applicant for the \$4.2M and we...through that, we fund 24 programs for the Supportive Housing Programs and that includes the Aurora Project, it includes Harbor House, it includes Neighborhood Health Association, many dollars to Neighborhood Properties, the Mental Health Board, the YWCA, the Lucas Metropolitan Housing Authority, and...

HICKS-HUDSON: Thank you.

CONKLIN: Okay.

8

HICKS-HUDSON: I mean, because that's what I needed, I mean...

CONKLIN: Yes.

HICKS-HUDSON: ...you're talking very, you know, ten thousand feet...

CONKLIN: Right.

HICKS-HUDSON: ...and it's...I didn't understand, so that's why I just needed to know that, so I appreciate that. And one last question -- when you're talking about 4.2M in dollars -- that comes from where?

CONKLIN: That comes from HUD through the Continuum of Care -- just application, and that is an allocation that we receive every year.

HICKS-HUDSON: Okay.

CONKLIN: And we have been...we're that part in the Consolidated Plan...we're the primary contributor to the part in the City's Consolidated Plan for ending homelessness.

HICKS-HUDSON: Okay, thank you. Thank you, Mr. Chair.

MARTINEZ: Great, thank you. And that clarified a lot for me also, so I appreciate the questions. So, if you can just give us a back...a cursory background -- I understand it goes pretty lengthy, but just give us a general background summary of the Action Plan and your role and, I guess, your recommendations.

9

bridge into that and the ESG allocation for fiscal year 25 did not include any rapid housing prevention dollars, not just for us, for lots...some communities may have been able to use it, but most communities continue to use it as they use it traditionally, which was for their shelter services. They...and they threw it out in the country and Toledo was allocated 199+ dollars. The State of Ohio also received some funding, which we - \$123,500.00 -- which we are administering to bridge into...to bridge into this new experience so, in a nutshell, that's what this Substantial Amendment is, is to accept this additional money that HUD has given communities to advance and transition into the Emergency Solution Grant Program, which now has to absorb since there's no HPRP funds -- the Emergency Solution Grant has to continue with its essential services, which it will do, but also add the rapid housing and prevention, which I can even share with you what the HEARTH objectives are, which are the primary objectives that HEARTH is instituting, so that's why it's so critical that communities receive this money to kind of help with the transition...

MARTINEZ: Great.

CONKLIN: ...but this is, too, one-time-only funding.

MARTINEZ: Okay, that's good to know -- it's one-time funding. Also, before I let you move forward, I'd like to recognize Council President Joe McNamara, and Councilwoman Hicks-Hudson, you had a question.

HICKS-HUDSON: Yes I do because I'm really trying to understand how the Emergency Shelter Grant, based upon how you just explained it, is going to work in terms of bridging the gap in funding for the loss of the CDBG funds. I know we're not talking...that the purpose of this is the Substantial Amendment, so my first question is -- when you

11

CONKLIN: For me? The Substantial Amendment, as I understand it, because in my early working this through, is HUD released significant dollars into the Nation recognizing that the recovery money was coming to an end. So the recovery money's coming to an end, HEARTH has been enacted, there's this new thing coming called the Emergency...

MARTINEZ: What is HEARTH? Just for...

CONKLIN: Okay, the...

MARTINEZ: Lots of acronyms, I know.

CONKLIN: ...okay, HEARTH stands for Homeless Emergency Assistance Rapid Transition to Housing Act that reauthorized McKinney-Vento, which brings all the dollars into the city that we're talking about, and HEARTH is -- as so often gets said -- it's sort of an overused system word, but is a paradigm shift and the way I like to explain it is it's clearly demonstrated and when they changed the name from Emergency Shelter to Emergency Solution and HUD, unlike some of the departments, use their stimulus money to pilot in what they understood would be future programming, so they kind of tested it out, if you would, with this Homeless Prevention and Rapid Re-Housing money that went into the community, which we, as a community, received in total to be about \$4.1M over three years, and I can give you numbers later on about how successful that program is, but I do want to...I do want to emphasize that we have had a successful -- as far as delivery of service -- a very successful program and experience working with rapid housing and prevention as a collaboration between several providers. And so then...so now this money's coming to an end, you know, it's one-time-only funding, never going to get it again, you've got this Emergency Solution Grant coming that we all need to get use to that they have increased for those same activities recognizing that we need to

10

talk about essential services under the rapid housing and prevention services program, what exactly are we talking about? What do you mean by that -- as essential services?

CONKLIN: In the federal register where it speaks about the Emergency Solution Grant of the \$614,000.00, it lists essential services, emergency services, job readiness...I mean, shelters...

HICKS-HUDSON: Okay.

CONKLIN: ...shelter services, case management services for shelters, job readiness, training, child care, there's even...that would even be a place where if an applicant wanted, and there was funds available, for acquisition, rehab of facilities -- it's the same essential service elements that has always been in the Emergency Shelter Grant.

HICKS-HUDSON: So, if I understand you then, the essential services are still going to be funded and the timeline for which a person who would be receiving those services are not constrained by like the 30, 90, 60 days, but it's potential that if a person who qualified could be able to stay within those facilities, receive these essential services for a period of time longer than this, you know -- shorter, you know -- moving them from homelessness to home, you know -- some type of housing stability.

CONKLIN: The shorter answer is and HUD, I think, clearly recognizes this -- there's been two major shifts and the one major shift is to move away from a programs-specific performance-based to a community-based outcome. So remember when I mentioned about the \$4.2M? To stay competitive -- to receive the full breath of funding a community needs to act systematically as a system to achieve as much as possible the outcomes that HUD is looking for, and one of

12

the outcomes that HUD has put out there, is reducing shelter stay. They haven't identified that somebody who's getting shelter on 29 days, can no longer get shelter on 35 days, but if a community like ours has an average of 75 days, or 60 days – I don't have those numbers right in front of me...

HICKS-HUDSON: Sure.

CONKLIN: ...but if we have an average of that stay and we couple that average with permanent housing placements and it puts us at a, you know, a less than desirable position, then the community needs to respond with a system, not to say to a shelter – you have to have that person leave in 31 days – the system has to provide an opportunity for that person to be able to leave in 31 days and access permanent housing.

HICKS-HUDSON: But I think... I think about the outliers, not the person, you know, if the person is homeless due to economics and there's no other kinds of issues such as domestic violence or substance abuse, or many other things that so many times that we've heard of before as reasons for people being concerned about this change, so these are outliers that would not fit into, necessarily, you know, if everything is okay other than not having a place to stay, I can see where the timeframe makes sense, so I guess my question is – from the description that you're giving, and you're talking about systems – I get that, but is it just government speak for saying that we're really moving from allowing individual shelters to provide those programs and they'll have to go to a different entity to get those kinds of services because you're going to put them... you're going to get them... move them out of the shelters into some type of housing, but they may not be ready to be able to sustain it.

13

HICKS-HUDSON: But what are the systems?

CONKLIN: ...achieve...

HICKS-HUDSON: Are we talking about mental health...?

CONKLIN: ...mental health...

HICKS-HUDSON: Right.

CONKLIN: ...we're talking about our public housing authority; we're talking about all these things. HUD has, I think, made it pretty clear that, they're not saying that housing is the end, in fact, they're demanding that communities understand that at below 30 percent median income because, by the way, that is the level, and anyone, I don't know about you, but anyone at 30 percent below, is a fragile... their housing is fragile whether they have domestic violence or chemical dependency or lack of security, they are in a fragile situation. So, what the community... what the Homelessness Board and what our role as a community is, is not to pressure our agencies to have to achieve all those things, but to demonstrate as a community we, at least, are doing our part... doing our part to make sure that our providers are working collaboratively as best they can to work as effectively and efficiently allowing us then to push our systems to provide for those home-based, accessible services so that every fragile citizen is able to achieve housing stability. That is... the goal for HUD is to have housing stability with services from... within the community and because they don't have the resources to provide the services, but certainly, our most fragile citizens that require these very expensive care – transitional housing is very expensive – we need to be sure as a system that those who need it most are the ones who are accessing it and not just those ones that are eligible and to really look around us and see what we can

15

CONKLIN: Well I don't want... I don't like being put in a position to defend HUD – okay?

HICKS-HUDSON: Okay.

CONKLIN: So that... let's just... I want to be clear about that.

HICKS-HUDSON: I'm not asking... and I understand that...

CONKLIN: However...

HICKS-HUDSON: ...and I'm... I'm not asking you to speak for HUD, but when you talk about systems and you're talking in terms of trying to explain the HEARTH, or the HEATH, or whatever this...

CONKLIN: HEARTH.

HICKS-HUDSON: ...this particular... this particular...

CONKLIN: HEARTH.

HICKS-HUDSON: ...HEARTH Act, and you're saying this is what HUD is requesting you to do and your agency is going to have to try to implement it, so that's why I'm asking these questions and you're the closest...

CONKLIN: Okay, HEARTH is not asking agencies to do this, HEARTH is asking communities to develop systems and partner with those systems that can...

14

learn to see if there's some ways that those connections can be made in the community. And, it's a big job...

HICKS-HUDSON: I know you're answering...

CONKLIN: ...and it scares me.

HICKS-HUDSON: ...I know you're answering it the best way you can – I really do – I really get that – so I'm really not trying to put you on the spot about... and I appreciate your trying to answer the question, and so I'm going to move this a little bit because I have another...

CONKLIN: Yes.

HICKS-HUDSON: ...that you mentioned... you said about technical assistance.

CONKLIN: Technical assistance.

HICKS-HUDSON: Yes.

CONKLIN: Did I say that?

HICKS-HUDSON: I think so. I wrote it down, or tried to write it down.

CONKLIN: I may have said it, I say lots of things that I forget.

HICKS-HUDSON: That's okay because I'm just really trying to under...

16

CONKLIN: Technical – okay, go ahead.

HICKS-HUDSON: ...I'm just really trying to understand how this...how this Substantial Amendment is really going to work because we, on Council, are going to have to make a decision based upon the recommendations that are going to come in, so we want to make sure that we do meet that goal that you're talking about in terms that the most fragile citizen receives the best services, so I get that, but you mentioned something about technical...technical – whatever – and usually that's a buzz word for providing support to agencies as they move from one system, or one process to another, so that says to me that that the way business is being handled today is not the way it should be handled in the future.

CONKLIN: I really apologize, I don't remember saying technical assistance, but let me...let me speak to the Substantial Amendment.

HICKS-HUDSON: Okay.

CONKLIN: The Substantial Amendment is meant to promote rapid housing and prevention activities. It is not available to provide essential services because of, like Lourdes mentioned, that has already been provided in this fiscal year and by regulation, it's a 60/40 split and we met our 60 percent already for the Substantial Amendment. So, the Substantial Amendment is addressing rapid housing and prevention and we have the extra challenge now of having to have 30 percent be our cut-off versus 40...50 percent? However, when we did an analysis, all of our...the vast majority – I won't say all because our HMIS guy isn't here – but the vast majority fell at zero income to 25 percent, so we know that we can provide home-based services to fragile populations and we have an 81 percent placement after services, so we have been working with fragile citizens with prevention and rapid

17

nothing to do with how we're going to allocate the \$610,000 – it's two separate issues.

HICKS-HUDSON: Even though it is and I understand that, it is extremely confusing and so, therefore, there really needs to be much more clarity from...and I'm not, again, saying that Administration, because you're responding to directions from the Feds, but there needs to be in very simple, down-to-earth concrete explanations because...and that's why – I hope you don't think I'm grilling you...

CONKLIN: Right.

HICKS-HUDSON: ...it's just that, in order for me to be able to do my job in a fair way and to understand it, I have to understand what we're looking at and what we're doing and...

CONKLIN: I can try to give it just one more...

HICKS-HUDSON: And you did, I mean...

CONKLIN: Okay, all right.

HICKS-HUDSON: ...I appreciate it because when, you know so oftentimes we hear the acronyms and you're used to using those terms – you understand what they mean. Essential services – what is that? I mean, you know – rapid housing – what does that really mean? How, you know...and then you're telling me that the 199,000 is not even the 600 that we're talking about...

SANTIAGO: No...

HICKS-HUDSON: ...before, so...

19

housing, and rapid housing – you know, all these buzz words – rapid housing are those who are literally homeless and prevention is for those who would be homeless but for this assistance. It is just that they would be evicted, or they lose their housing but for this assistance...they would enter into our emergency shelter system. And so, this is a way for a community to address the myriad of needs that our providers have been recognizing for eons and some of them have been able to secure response to those needs for their clients, and we need to marshal that, duplicate that, make that broader so that the whole system has that available to them.

SANTIAGO: But again, just to clarify, the \$199,000 is for this current fiscal cycle. It is to complement, or amend the Action Plan that was submitted for the ESG going into our 26th Year. We – I'm sorry – our 25th Year. We are not addressing with this Substantial Amendment the \$610,000 that is being awarded to our community for Emergency Solutions Grant.

HICKS-HUDSON: Why not? Why? Why?

SANTIAGO: That is not the issue that is before Council at this time. We're just amending our 26...25th Year Action Plan for the ESG. – I'm sorry – we're amending our Action Plan because we have received an additional allotment of \$199,000+ for our 25th Year ESG and because under that first allocation we distributed that monies. This money is...

HICKS-HUDSON: ...the \$199,000.

SANTIAGO: ...this \$199,000 is to be allocated in keeping with what Miss Conklin has referred to that the...what HUD has identified as the rapid re-housing, still the essential services, but it has

18

SANTIAGO: ...no, no, we haven't even...

HICKS-HUDSON: ...I understand...

SANTIAGO: ...commenced to talk about the 600...

HICKS-HUDSON: ...I know because you're waiting until April 27th.

SANTIAGO: Yes, April 27th...

HICKS-HUDSON: I remember what that date is.

SANTIAGO: Thank you, thank you.

HICKS-HUDSON: I can say that for you – I hate that – but yeah – I can say that date for you, but the point is that all this stuff is going on and we talked about the fragile citizens and that's what my concern is that not only the fragile citizens that are provided the services, but the service providers who see it every...each and every day on the front line and not knowing how they're going to be able to tell, you know...you know, the families that they're dealing with – we're not able to do it or we can't...we don't know what we're doing and the uncertainty is the problem, whether it's uncertain on the part of the Administration, on your part, or the Feds giving a last-minute deal, it's just that we need to come up with a better way to get information out that's clear.

CONKLIN: I'd like to go on record to clarify something. There is no plan to change for the immediate future the amount of funding, or reduce any of our current essential services that has been funded through ESG. The trick is for us, as a community, is to recognize that the Emergency Solution Grant added the opportunity, or

20

burden, depending on how you want to look at it – added the opportunity to include and actually mandated to include now prevention and rapid re-housing as part of the solution. This is the clearest way to understand it. That’s why I say you have to look at it going from a shelter system doing it by itself to looking at forcing a community to look at solutions, and they even say on their rule that the name change was intentional to show the shift from sheltering to solution and, you are right, this is very hard work on the frontlines, except I can tell you every day somebody is saying no to somebody in need in this community and they don’t know where to go, but they’re given a phone number or they have to go somewhere else. So, I guess I understand that this program isn’t going to be able to say yes to everyone, but the programs we have now doesn’t say yes to everyone. In fact, our data shows that we do not have near the permanent housing outcomes that we’d like to have as a community.

MARTINEZ: Thank you. So, not to beleaguer the point, I just want to make sure – I’m sorry, Miss Conklin, I sincerely appreciate your explanation, I’m just going to try to put it in a different...

CONKLIN: Okay.

MARTINEZ: ...framework – okay. So, really, the Solutions Grant is a top up from the top down approach to making sure that our...the government’s systems, the other agencies’ systems are working in cohesion? Kind of like breaking down silos to make sure we’re all talking to each other. I know it’s a novel concept, but you know, sometimes it does happen in government.

CONKLIN: I would say...I would say that it’s even more than breaking down silos so that we talk to each other. I think we have a cooperative model in the community.

21

CONKLIN: ...and that’s...that’s...that’s what we’re up against.

MARTINEZ: Gotcha, okay, so I think I have a clearer understanding now, so are there any other questions from my colleagues regarding the One-Year Action Plan? Okay, so then the 199 – this is... One-Year Action Plan is to accept the hundred...extra – almost \$200,000.00 – with a little bit more depending on how you look at it – strings attached – to help bridge the gap until we get to the new Emergency Solutions Grant. Is that correct? Is that a good...?

SANTIAGO: Right, except we need to insert the word “Substantial Amendment”...

MARTINEZ: Gotcha, okay.

SANTIAGO: ...to the Action Plan.

MARTINEZ: The Action Plan – okay.

SANTIAGO: Okay.

MARTINEZ: With that being said, I will turn it open to the public if anyone – there is a sign-up sheet if you would please feel free to sign up. We’re very encouraged to see so many people here to see if there’s any other comments, or additions, subtractions that we make sure everybody’s heard. I was just going to say you might as well come up, I think that you were the only person I saw. I’m sorry for the exercise going back and forth – my apologies. So, if you can just state your name and your address and who you represent for the record please, and you’ll have...you’ll have five minutes.

23

MARTINEZ: Okay.

CONKLIN: It is about...it is about seeing us in unison and collaboratively impacting the whole.

MARTINEZ: Right, so kind...

CONKLIN: So what “A” is doing over here...

MARTINEZ: Right.

CONKLIN: ...affects what “C” is doing over here, and we say that, but we haven’t...we don’t have that in any kind of structure, so I don’t see it so much as a top down as I see it more like this with probably the Homelessness Board facilitating it and then measuring it and offering what it can, you know, to keep the community moving forward so that we can stay competitive. I want...I don’t want to throw a lot of stuff in here, but we are not very much points ahead now – I think we’ve only made it by the skin of our teeth the last three times to receive any new funding through the Supportive Housing Program, and that has got to do with the community, not with individual performance.

MARTINEZ: Sure, sure.

CONKLIN: It’s how we’re doing as a community, and so this is about us assisting our hard workers, and these are two overused words, but they’re not an acronym – but it is effective and efficient...

MARTINEZ: Okay.

22

GRIFFIN: My name is Kathy Griffin, I’m the executive director of Bethany House, and we are a long-term domestic violence shelter for battered women and their children. I want to talk to process. For two years, I have repeatedly come to TAAEH meetings; I repeatedly asked at meetings – what’s our safety plan for domestic violence victims in this community? I have been told repeatedly – now is not the time, not at this meeting, we’re not going to discuss that now – excuse me, I get a little passionate. My concern is – what happens...what is our community going to do with domestic violence victims because not every woman is going to be safe with staying in that home and wrapping services around her. Why are we not looking at the safety issues? For domestic violence victims, we have to think safety first. You know, we know from research and through “Shattered Lives” – a publication that was put out by the University of Toledo Law Clinic – we know that women are at greater risk of being murdered once they have left that relationship, so we know this is the most dangerous time for a victim is when they have left or when they’re ending the relationship and, not just that victim, but for the children that are being murdered also. You know, we need to recognize that there’s a need. Our community needs to do something for domestic violence victims. We can’t just say one size fits all, one stop this, one stop that – we have to understand there are people who need longer time. The courts do not work fast, the courts are not going to give her a protection order in 31 days – I can guarantee you that, so I’m just asking City Council to take that into consideration as you make all these decisions. Thank you.

MARTINEZ: Great, Miss Griffin, I appreciate your comments and I guess I would defer the question to Miss Conklin if those are issues addressed, maybe not specifically, if they are touched upon.

CONKLIN: With the ESG dollars, there is ample room, as there has been, for all of our specialized populations to receive

24

assistance, but there is not enough dollars within these resources to speak to what Kathy – Mrs. Griffin – has spoken to. I, as a former president of a battered women’s shelter myself, understand quite well what she described, but this is an issue that is larger than the housing issue and I welcome and encourage all domestic – they have a strong network – to do what they can to create and support the safety plans that are needed by those who suffer that awful experience. It is also my understanding that folks...a lot of women seeking shelter, because of limited space, are accessed by our battered women’s shelter and they seek other housing if that’s warranted, and if it’s not, how, you know, safety plans are put in place. There is no way that we would encourage anyone to be rapidly housed that have that as a threat. We would not have that be an expectation, so there’s no expectation being laid out on domestic violence shelters that folks have to be ready to leave at a certain day, but we would ask for as thorough an assessment by the professionals to do that because we also know that there are many who live in homes not as well as they would like but, you know, and not as safe as they would be in a protected environment, certainly, but that is a community problem...I mean, that’s a community issue. I don’t know if that helped.

SANTIAGO: But I think it’s important to also note that, first of all, DV victims are a specialized population in the HUD regulations, and so they are not to be cast aside or forgotten – on the contrary, and the other important manner to remember is that with the centralized intake, which will be so critical a part of the Solutions, that a proper assessment can be made so a proper placement can also take place.

MARTINEZ: Okay, great. Thank you. Are there any other questions or comments from the public? Going once, going twice. Okay, seeing no further business, I will adjourn this meeting. Thank you.

ORD. 231-12

Authorizing the Mayor to deposit the estimated \$610,343 grant dollars, received from the U.S. Department of Housing and Urban Development (HUD) to fund Emergency Solutions Program activities, into the Operations Grant Fund for the purpose of funding the 26th Year Emergency Solutions Grant Program; appropriating the estimated sum of \$610,343 from the unappropriated grants proceeds in the Operations Grant Fund for the program year of July 1, 2012 through June 30, 2013; authorizing the submittal to HUD of the 25th Year ESG Substantial Amendment; and declaring an emergency.

SUMMARY & BACKGROUND:

Beginning in federal fiscal year 1995, the United States Department of Housing and Urban Development (HUD) began requiring local communities to undertake a consolidated planning process in order to receive funding from the Emergency Shelter Program. Ordinance 193-12 authorized the Mayor to accept these dollars. The amount estimated up to \$610,343 is available from HUD to fund the City of Toledo's 26th Year Consolidated budget for Emergency Solutions Grant operations. The City of Toledo's One-Year Action Plan is prepared incorporating any other comments deemed appropriate by the City and to be submitted to HUD by May 16, 2012. Likewise, this ordinance authorizes the submittal to HUD of the 25th year ESG Substantial Amendment. NOW, THEREFORE,

Be it ordained by the Council of the City of Toledo:

SECTION 1. Authorizing the Mayor to deposit into Account Code 2016-16100-5GE2602 the 26th Year ESG grant estimated to be \$610,343 received from HUD to fund Emergency Solutions Program activities; and authorizing the submittal to HUD of the 25th Year ESG Substantial Amendment.

SECTION 2. Authorizing the appropriation from the unappropriated grant proceeds in the Operations Grants Fund in an amount estimated to be \$610,343 into Account Code 2016-16100-5GE2602.

SECTION 3. That the Mayor and the Director of Neighborhoods are authorized in partnership with TLCHB to accept proposals for the purpose listed in Section 1.

SECTION 4. That this Ordinance is hereby declared to be an emergency measure and shall take effect and be in force immediately from and after its passage. The reason for the emergency lies in the fact that same is necessary for the immediate preservation of the public peace, health, safety and property, and for the further reason that this Ordinance is necessary to deposit the funds, which will be used after proposals are received and accepted by Council, for the Emergency

Solutions Grant program activities in the City of Toledo by the Department of Neighborhoods in partnership with TLCHB, as well as submit the 25th Year ESG Substantial Amendment to HUD.

Vote on emergency clause: yeas 12, nays 0.

Passed: MAY -8 2012, as an emergency measure: yeas 12, nays 0.

Attest: [Signature] Clerk of Council Joe McManara President of Council

Approved: MAY -9 2012 [Signature] Mayor

I hereby certify that the above is a true and correct copy of an Ordinance passed by Council MAY -8 2012.

Attest: [Signature] Clerk of Council

