

City of Toledo
Department of Neighborhoods

CAPER

CONSOLIDATED ANNUAL PERFORMANCE and EVALUATION REPORT

July 1, 2012 - June 30, 2013

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CITY OF TOLEDO



DEPARTMENT OF NEIGHBORHOODS

September 26, 2013

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

RE: 2012-2013 Consolidated Annual Performance and Evaluation Report (CAPER)

Dear Ms. Lawson:

Please find enclosed an original and four (4) copies of the City of Toledo's Consolidated Annual Performance and Evaluation Report (CAPER) submitted for the 38th program year, July 1, 2012-June 30, 2013.

As required, in preparation of the CAPER and prior to its submittal, the City of Toledo Department of Neighborhoods did the following:

- Draft copies of the CAPER were placed in various designated sites throughout the city.
- The meeting notice was published in local newspapers, including the Toledo Free Press, The Toledo Journal, and La Prensa.
- A public meeting was held at a most accessible location on Thursday, September 12, 2013, at 6:00 p.m.
- The meeting was recorded, as well as, streamed live.
- One written comment to the CAPER was received during the fifteen (15) day comment period.

Please do not hesitate to contact this office and the undersigned if any questions arise or additional information is needed regarding the CAPER for PY 38. Thank you.

Respectfully,

Lourdes Santiago
Director

LS:slt
Enclosures

CITY OF TOLEDO 2012-2013

Consolidated Annual Performance and Evaluation Report

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I. EXECUTIVE SUMMARY

Based on its status as an entitlement city and participating jurisdiction, the City of Toledo (COT), Department of Neighborhoods (DON), receives federal funds from the U.S. Department of Housing and Urban Development (HUD) to address the priorities identified in the 2010-2015 Five-Year Consolidated Plan (CONPLAN). The funds received are allocated primarily to two of the three HUD priorities; benefit to low- and moderate-income persons and elimination of slum and blight. This Consolidated Annual Performance and Evaluation Report (CAPER) documents the accomplishments for the Program Year (PY) 2012 for the City of Toledo, encompassing July 1, 2012 through June 30, 2013.

For the PY 2012 - 2013, the City of Toledo partnered with many organizations to address and accomplish the priorities of the CONPLAN, leveraging local, state and federal dollars. Areas of highest priorities and where most efforts were dedicated:

- Improvement of housing conditions through the rehabilitation and repair of owner-occupied and rental property
- Demolition of vacant structures
- Assistance to social and human service organizations engaged in: promoting educational and life-skills programs; soup kitchens; access to health services; and legal assistance for housing landlord/tenant relations
- Ending homelessness
- Economic development
- Foreclosure prevention

These activities continue to enhance neighborhood stabilization efforts directed towards economic recovery of the COT and its residents. Much progress has been made in those areas as demonstrated by quantitative information provided in attached Table 1C included in this report and as explained in the narrative. Table 1C provides quantitative comparison of the COT's accomplishments in the last three years according to the goals established in the CONPLAN for 2010-2015.

As efforts continue for the execution of the goals and objectives identified in the CONPLAN, adjustments are made to reflect the continuing changes in our economic and social environment. Due to the housing market conditions, some efforts have shifted from new construction to the rehabilitation and repair of homes and additional efforts are taking place to continue increasing the number of persons who can achieve homeownership in Toledo.

Summary of Resources and Distribution of Funds

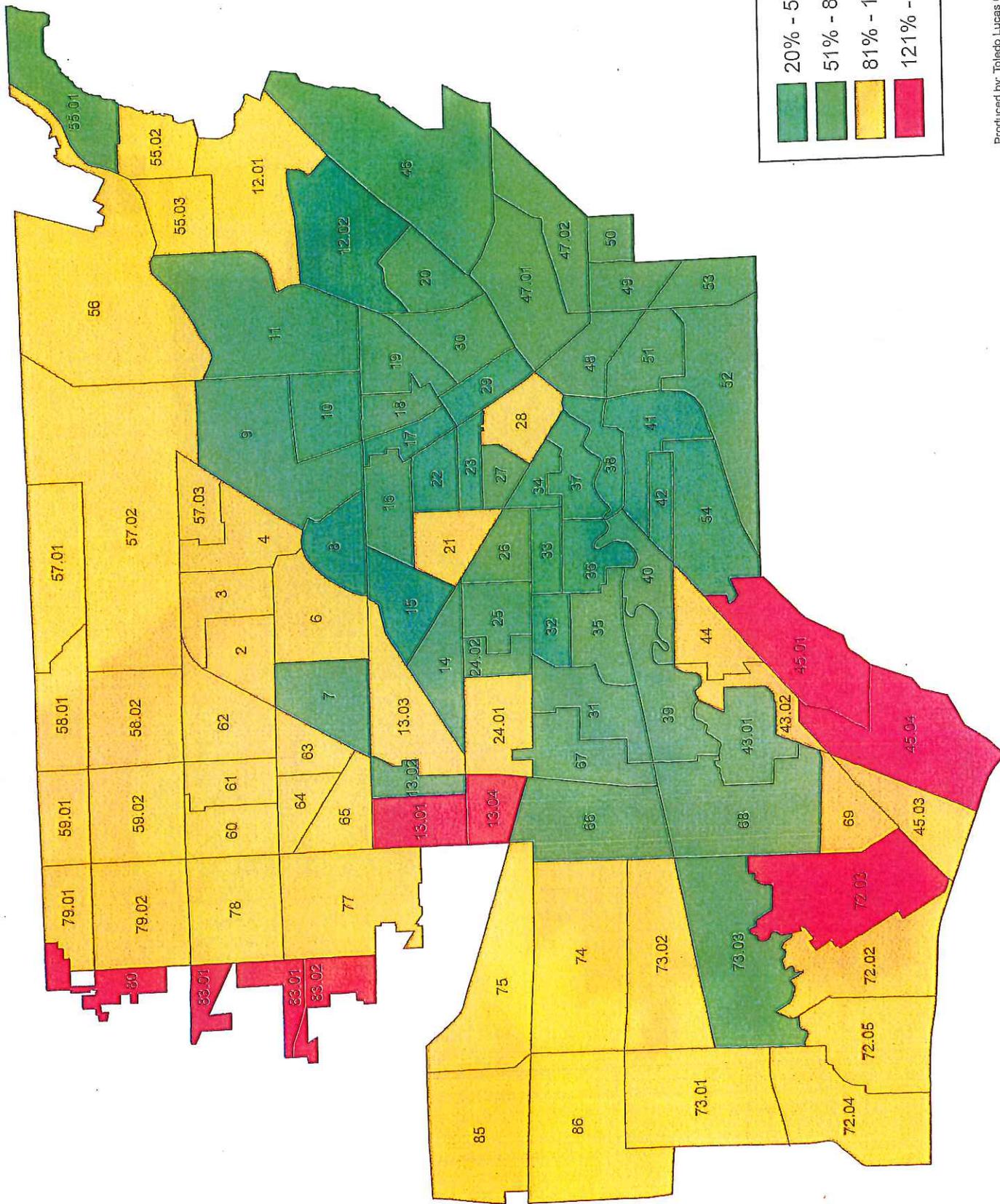
Federal funds available for PY 2012 - 2013 were:

Source	Available	Commitment / Grant Period	Expended
Community Development Block Grant (CDBG)	\$6,839,464.00	PY 2012 - 2013 100% committed	\$6,336,983.03 (in PY 2012)
HOME Investment Partnerships (HOME)	\$1,682,898.00	PY 2012 - 2013 100% committed	\$214,096.71 (in PY 2012)
Emergency Solutions Grant (ESG)	\$610,343.00	PY 2012 - 2013 (the 2011 substantial amendment extended the grant into 2012)	\$536,215.45 (in PY 2012)
Community Development Block Grant-Recovery (CDBG-R)	\$2,141,045.00	Three-Year grant – expired on 9/2012	\$400,454.37 (in PY 2012)
Neighborhood Stabilization Program (NSP1)	\$12,270,706.00	Four-Year grant – expired on 3/2013	\$502,384.30 (in PY 2012)
Neighborhood Stabilization Program 2 (NSP2)	\$10,150,840.00	Three-Year grant – expired on 2/2013	\$3,030,185.64 (in PY 2012)
Neighborhood Stabilization Program 3 (NSP3)	\$3,591,415.00	Three-Year grant – expiring on 3/2014	\$496,945.09 (in PY 2012)
Homelessness Prevention and Rapid Re-Housing Program (HPRP)	\$3,275,494.00	Three-Year grant – expired on 8/2012	\$326,705.63 (in PY 2012)
CDBG Program Income (estimated)	\$493,184.00	Estimated for PY 2012 – 2013	\$575,353.14 (in PY 2012)
HOME Program Income (estimated)	\$0.00	Estimated for PY 2012 – 2013	\$26,210.50 (in PY 2012)

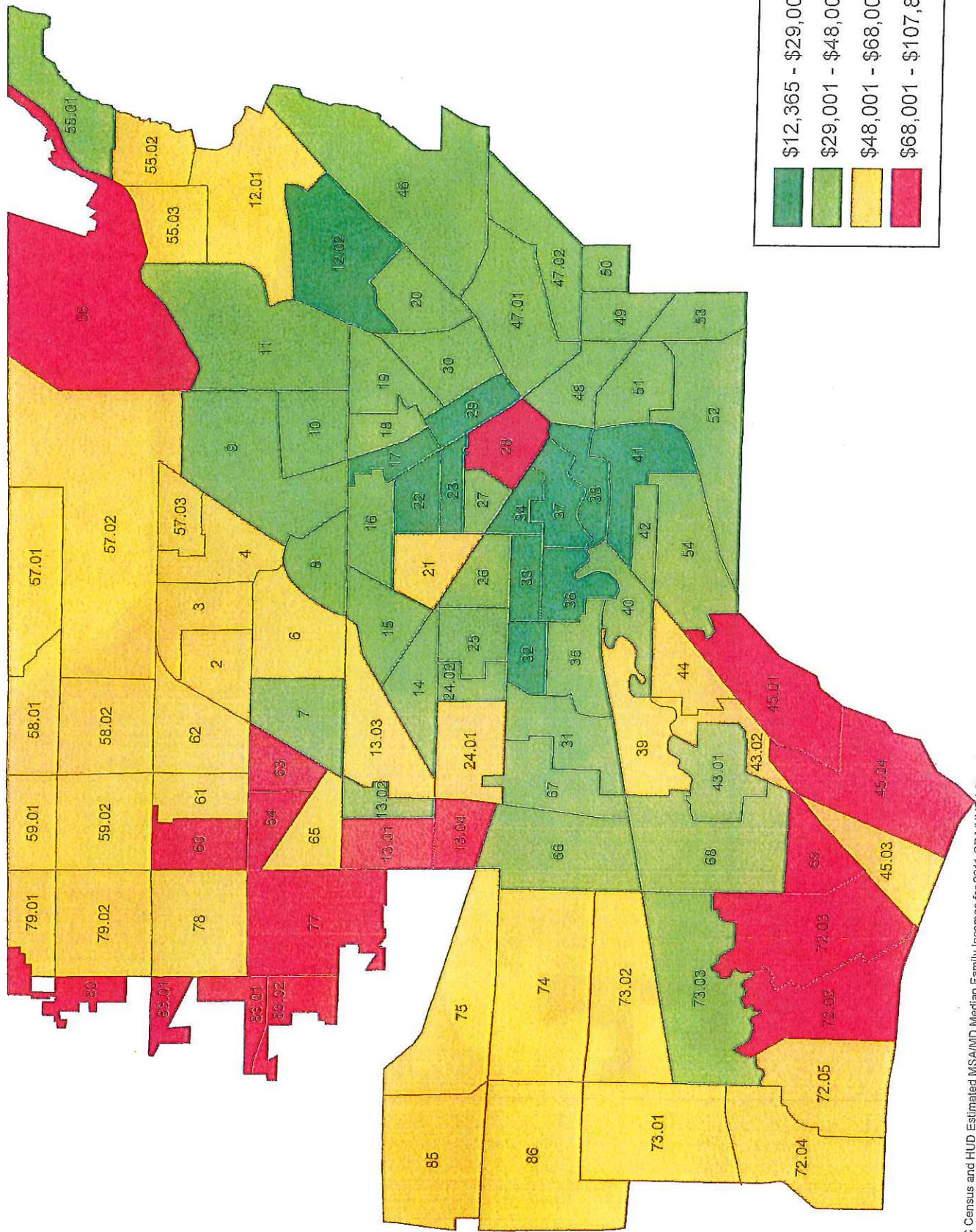
Geographic Distribution and Location of expenditures

The maps on the following pages contain data identifying the areas of most need in the COT where efforts were concentrated to accomplish the priorities of the CONPLAN. On the map on page 3, green areas note the census tracts with populations whose incomes are below 80% of the Median Family Income. These are the areas where identified priorities in the Action Plan were concentrated. The green areas represent 50 low -moderate-income census tracts which are: 7, 8, 9, 10, 11, 12.02, 13.02, 14,15, 16,17, 18, 19, 20, 22, 23, 24.02, 25, 26, 27, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43.01, 46, 47.01, 47.02, 48, 49, 50, 51, 52, 53, 54, 55.01, 66, 67, 68 and 73.03. Code enforcement activities were also concentrated in the same 50 low -moderate-income census tracts listed above.

Percent Median Family Income by Census Tract 2011

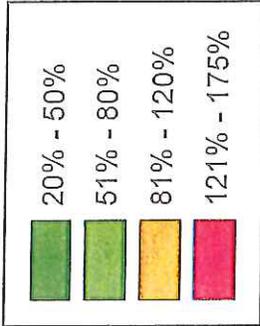
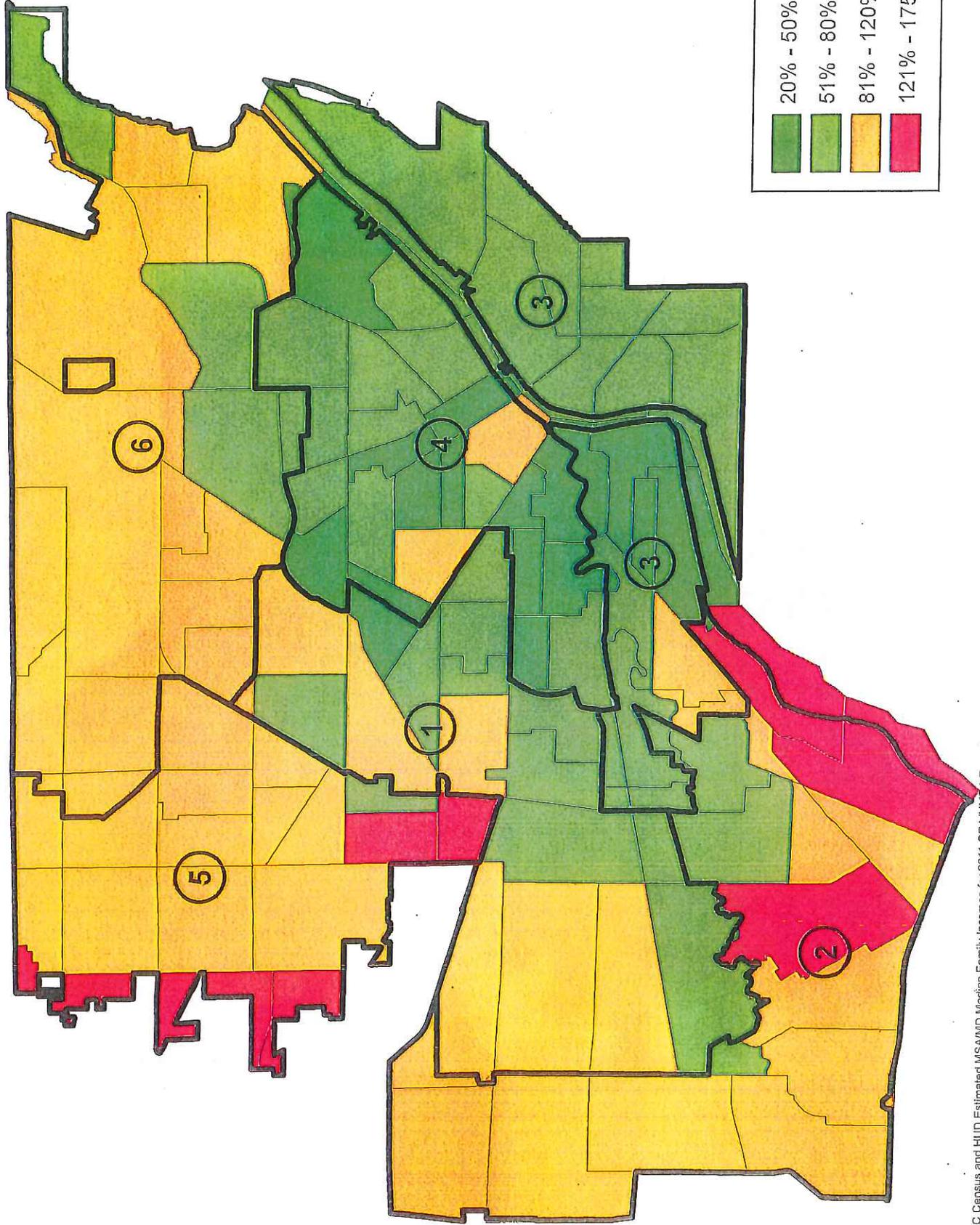
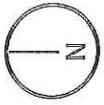


Median Household Income by Census Tract 2011

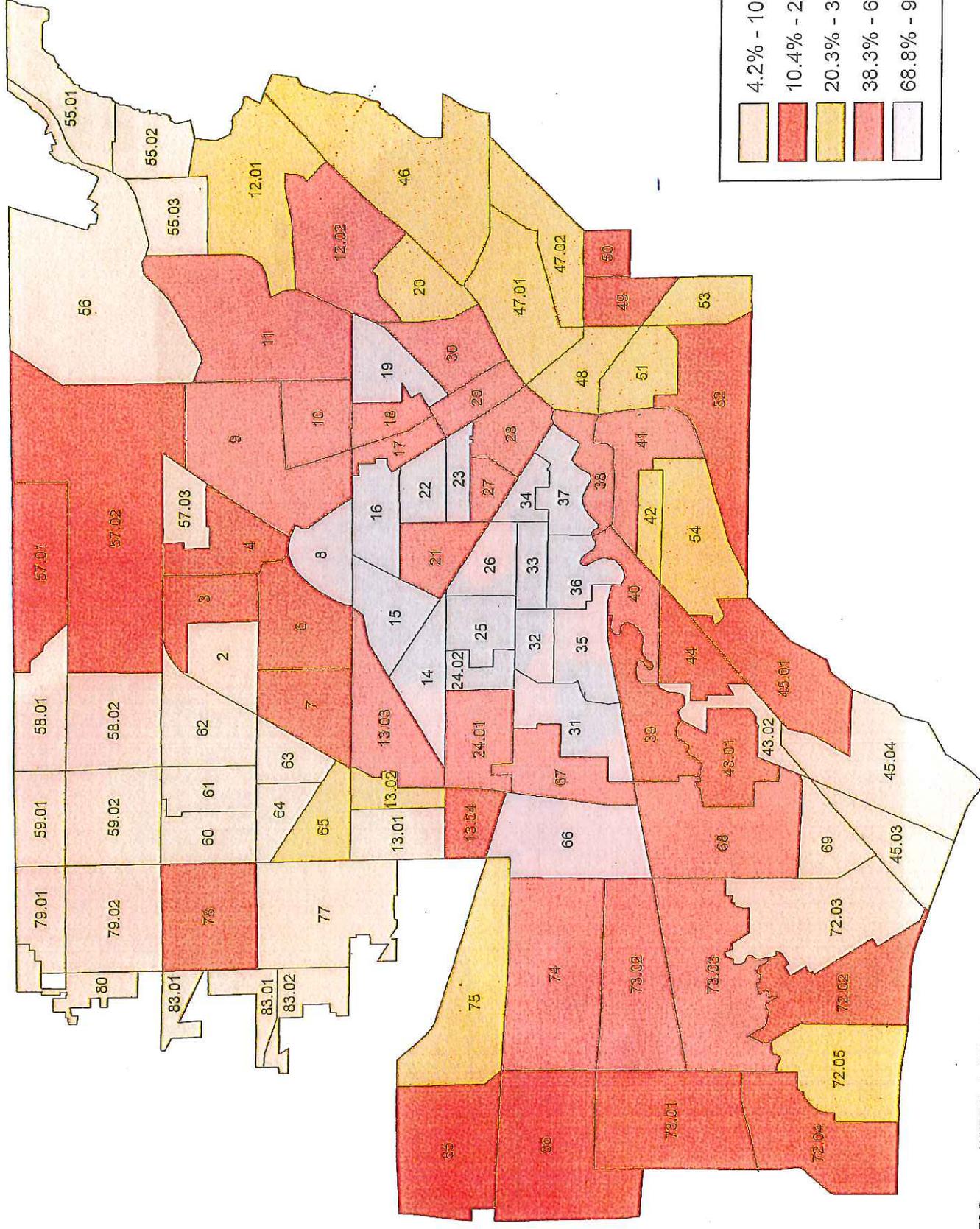


Data Source: FFIEC Census and HUD Estimated MSA/MD Median Family Incomes for 2011 CRA/HMDA Reports

Percent Median Family Income by Council District 2011



Percent Minority Population by Census Tract 2011



II. FIVE-YEAR PLAN ASSESSMENT OF PROGRESS

The City of Toledo's program year, July 1, 2012 through June 30, 2013, represents the third year of the 2010-2015 Five-Year CONPLAN. Projects selected for funding were evaluated based not only on their ability to stimulate neighborhood revitalization, economic growth and community development, but whether they addressed a priority goal and/or a funding gap identified in the 2010-2015 CONPLAN.

For the Program Year (PY) 2012-2013, the City of Toledo again prioritized its goals according to community needs, assessing whether the project addressed a critical need and/or recently emerging issue, such as the foreclosure crisis and unemployment. The City also utilized the priority operational goals listed below as a benchmark to measure whether projects reflected a more concentrated and coordinated effort.

1. Improve Coordination and Collaboration of Community Services - Coordination is critical at three levels: a) the city's continued efforts to work collaboratively with private/non-profit entities; b) all city departments, as applicable, working in coordination to assist in non-profit initiatives and community needs; and c) the encouragement of non-profit entities to establish strategic alliances.
2. Strengthen the Delivery Systems for Rebuilding Neighborhoods - An assessment of CDCs to determine potential for long-term sustainability and engagement in efforts to improve agency capability.
3. Support and Provide Funding for Community Planning - A framework for private and public investment, including capital improvement, to be established which promotes holistic revitalization strategies that include social, physical, and economic improvements.
4. End Homelessness - Continued focus 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. Goals are: a) Homelessness Prevention; b) Coordinated homeless services; c) Community engagement, coordination, and oversight; and d) Sufficient affordable housing.
5. Enhance the City's Economic Development Role - Emphasis is placed on working in a regional context in partnership with other local economic entities. Emphasis to include small business retention and attraction, the enhancement of the downtown district, and the revitalization of neighborhood business districts.
6. Enhance Resources to Achieve Housing Goals - Utilization of and access to state and federal resources for additional housing funding opportunities. Also, an enhancement of the participation of private developers to induce stabilization and improvement in the housing stock market, and create a synergy of coordinated market-rate housing and/or commercial development that supports a targeted neighborhood.
7. Improve Customer Satisfaction - In accessing housing services, customer satisfaction surveys are to be promoted to ensure respectful resolution to applications for assistance.
8. Simplify Processes for Residents and Organizations to Receive Assistance - Improve the process for providing information for individuals and agencies seeking financial and/or technical assistance.

9. Disperse Affordable Housing - Target public and private investment (local lenders, other partners) to attract additional investment for affordable housing and creating diverse neighborhoods.
10. Affirmatively Furthering Fair Housing – Implementing a five-year Fair Housing Plan to ensure that all persons have equal access to the housing of their choice in an area of their choice.
11. Target Resources for Impact - To maximize the impact of accessed resources, target select neighborhoods to receive project funding, encouraging additional investment.

PRIORITY PROGRAM GOALS

Eleven priority program goals guided the City of Toledo in determining which projects and activities to fund for the period July 1, 2012 through June 30, 2013. These goals were established through various citizen participation methods such as forums and stakeholder meetings and will continue to be utilized within the City of Toledo's strategic planning efforts through June 30, 2015. Below is a summary of accomplishments for each priority category under each applicable goal.

1. Improve Housing Conditions

High Priority Goal: Rehabilitate/Repair Owner-Occupied Deteriorated Housing

The *Division of Housing and Neighborhood Development* of the DON utilized HOME funds to complete the rehabilitation of 27 owner-occupied housing units, thereby improving the quality of housing stock within the city limits. The units were all brought up to existing building codes.

The *Division of Housing and Neighborhood Development* of the DON utilized an additional source of funds, Nuisance Abatement Trust Funds, a non-federal source, to provide owner-occupied homes with minor repairs of their housing units. The number of those assisted (five) led to improved living conditions of residents. This project was undertaken in partnership with the Northwest Ohio Development Agency (NODA), which leveraged an additional \$14,827 for this project.

United North Corporation (UNC) provided rehabilitation to owner-occupied, single-family households in its service area (census tracts 9, 10, 11, 12.02, 17, 18, 19, 20 & 30). They rehabilitated 25 units targeting low- and moderate-income households achieving over 100% of their projected outcome and improving the housing stock in their area by 25 units. United North's rehabilitation efforts exceeded its goal of 16 units by 63%. *UNC* exceeded its projected outcome of improving the quality of existing housing stock due to unexpected higher demand for services and additional efforts by their staff to identify the housing needs in the UNC area.

NeighborWorks® Toledo Region (NTR) (formerly Neighborhood Housing Services, Inc.) completed a total of 62 owner-occupied housing rehabilitations to improve the quality of existing housing stock during PY 2012. The organization achieved over 100% of the annual output goal

due to an unexpected higher demand for services and the availability of non-CDBG program resources.

Maumee Valley Habitat for Humanity (MVHFH) improved the quality of housing stock through owner-occupied rehabilitation to 11 housing units. Their original goal was achieved. Their efforts resulted in improvement of the housing stock within the Secor Gardens and Library Village areas by .008%. (Based on 2010 Census: total housing units)

Toledo Community Development Corporation (TCDC) had open activities at the end of the PY 2011. As of June 2013, those activities have been successfully completed in HUD's Integrated Disbursement Information System (IDIS).

In PY 2010, *TCDC* committed to improve the quality of housing stock through owner-occupied energy conservation projects. Rehab projects were completed for six housing units and 60% of their proposed outcome for this activity was achieved. This activity is now closed in IDIS.

Economic Opportunity Planning Association of Greater Toledo, Inc. (EOPA), during the reporting period, completed emergency repairs and improvements on 50 units of a proposed outcome (goal) of 48 owner-occupied, single-family housing units to benefit elderly and disabled persons. The agency met 104% of their projected annual goal and 100% of the families served were able to maintain housing for at least six months.

East Toledo Family Center (ETFC) provided emergency home repairs to 69 households at-risk of losing their homes, thereby allowing them to maintain a healthy and safe living environment and/or resolve local housing code violations. This resulted in improvement of the quality of .28% of the senior-citizen, owner-occupied housing stock in the City of Toledo. (Based on 2010 US census 25,062 owner-occupied senior-housing units in the City of Toledo for householders 62 and over.)

The *Toledo Municipal Court (TMC) Code Violation Abatement Program (CVAP)* targeted the HUD-defined objective of addressing decent housing, specifically for those who have been cited for housing code violations. *CVAP* was granted an extension of one year on their PY 2011 contract; however, at the request of the court, this program officially ended on December 31, 2012. Six houses were renovated between January 1, 2012 and December 31, 2012. Due to the termination of this program, the outcome achieved was only eight. The CDBG contract was terminated and funds were recaptured.

High Priority Goal: Rental Rehabilitation and Repairs

Under CDBG-R, the *Division of Housing and Neighborhood Development* originally, in 2010, projected to assist 18 households with rehabilitation of rental units in single-family structures (1 - 4 residential units in a structure), but the 1:1 match requirements limited potential for assistance. Only two rental units were completed in PY 2012.

United North Corporation (UNC) improved the quality of housing stock to support community stability and neighborhood revitalization efforts through rehabilitation of two rental units for LMI households in the Sherman New Schools New Neighborhood target area. By the end of PY 2012, *United North* had not achieved their proposed outcome of eight. *United North* is working with the DON to process numerous applications and bids and two projects are underway. The remaining six units are expected to be completed by May of 2014. This effort is part of the Sherman Rental Rehab project.

High Priority Goal: Home Maintenance Education

Federal funds were not utilized for this objective in PY 2012.

Medium Priority Goal: Demolish Abandoned Houses and other Structures

Demolition of private property is a joint effort between COT Code Enforcement Division (CED) and COT Division of Streets, Bridges, & Harbor (SB&H). In PY 2012, 333 structures were demolished, exceeding the proposed outcome of 265 housing units. These homes were dilapidated, blighted structures and a threat to the health, safety, and welfare of the neighborhoods. All of the structures were abandoned and stripped of any usable items such as plumbing, HVAC systems, water tanks, etc. Some of the homes had also been gutted by fire. The COT General Fund paid for the demolition of 51 homes that were fire damaged and in imminent danger of collapse. The Lucas County Land Reutilization Program funded 266 demolitions and the NSP program funded 16 demolitions.

Medium Priority Goal: Housing Code Enforcement and Nuisance Abatement

The CED of the COT's Department of Inspection issued 9,627 orders to property owners living in low- and moderate-income areas in PY 2012-2013. Orders were issued to property owners to abate nuisance conditions on their property such as: the exterior of houses not up to code (paint, roof, junk & debris, foundation, landing, windows, doors), swimming pools, chimneys, driveways and sidewalks. Under this activity, the CED also processed orders for 333 demolitions using a combination of funds from the COT, the Lucas County Land Bank, and NSP. The demolitions were completed in partnership with the COT's Division of Streets, Bridges & Harbor (SB&H). The goal of 4,000 orders for this activity was exceeded by 140%. This increase was due to the filling of vacant positions: three inspectors and two clerks.

In the 2012-2013 Action Plan, the DON proposed funding *Call City Hall* in the Department of Public Utilities. Upon further review of funding priorities, however, and the availability of other COT funding for this program, the cost of *Call City Hall* was assumed by other COT funds (non-federal). Therefore, the DON is not reporting on this activity.

The *Prosecutor's Office* improved neighborhood housing conditions by prosecuting violators of Toledo Municipal Code Housing Code in LMI areas. An outcome of 800 case convictions was proposed for PY 2012. Using actual data through March 2013 from the Northwest Ohio Regional Information System (the database of the Lucas County Criminal Justice System), 618 cases were prosecuted in PY 2012. A change in the law for the preparation of inspectors'

affidavit caused a slowdown in case filings at the start of PY 2012; therefore, the low number of case convictions. Furthermore, a number of cases were consolidated.

The Lucas County Regional Health District (LCRHD), in collaboration with the Department of Inspection, resolved housing complaints (nuisance abatement) to avoid court action, specifically as it relates to rodent complaints. Based on citizen complaints, sanitarians issue orders to residents to resolve rodent complaints.

In PY 2012-2013, the LCRHD issued orders to 1,036 housing units. A total of 1,322 rodent complaints were resolved before court action was necessary (this total includes 286 outstanding orders issued before July 1, 2012) and includes:

- 733 housing units abated via order (order complied)
- 166 housing units abated via court referral, and
- 423 housing units consulted regarding rodent abatement.

The total number of resolved complaints represent a 2% increase over the proposed outcome for PY 2012.

The *Neighborhood Beautification Action Program (NBA)* of the Department of Public Service completed a record 19,496 work orders in LMI areas. A new COT ordinance, which more clearly identifies when the length of grass becomes a nuisance (i.e. tall grass and weeds), and authorizes the cutting by the NBA, without specific orders to the property owners, contributed to NBA exceeding its proposed outcome of 18,000. Nuisances addressed by the *NBA* include: tall grass and weeds, cleaning up junk and debris, boarding up abandoned and open structures, and removing graffiti.

City Policy: New Housing Construction

As new construction efforts were deemed a lower priority by consensus, only efforts that were undertaken in defined target areas undergoing comprehensive revitalization efforts were considered for funding. *UNC's* Cranes Landing met that standard and 40 rental-housing units for low- to moderate-income senior households within the Chase New Neighborhood target area were constructed. Cranes Landing, offered one- and two-bedroom apartments and was built on the site of the former Chase Elementary School, making use of vacant space to increase housing stock. This project is complete with all 40 units occupied.

Collingwood Green Senior Housing was also completed during this period. This attractive 65-unit project features one- and two-bedroom apartments with a community room and health facility. This is the first of several phases for Collingwood Green. The second phase of family townhouses is expected to begin construction Spring 2014. Built on the former site of the Albertus Brown housing project, Collingwood Green is anticipated to create an entire new neighborhood of mixed-income styles of housing.

Two new homes on Turret Green were constructed and sold through the Neighborhood Stabilization Program.

2. Public Service (Social/Human Programs)

High Priority Goal: Promote Educational Enrichment and Life-Skills Programs

Federal funds were not allocated to this priority in the PY 2012.

High Priority Goal: Soup Kitchens and Feeding Programs

Activities under this goal met HUD's national objective of Suitable Living Environment and the defined outcome of Availability/Accessibility. Persons who benefited from feeding programs potentially could divert the savings in food purchases toward other basic living expenses such as rent, utilities, etc.

Toledo Seagate Food Bank (TSFB) received CDBG, which it utilized to provide nutritional food supplements to city residents. *TSFB* served 4,477 persons, 28 over its initial projection. Through their efforts, each recipient received an average benefit valued at \$140 per week.

Martin Luther King Kitchen for the Poor (MLK) distributed supplemental grocery and food boxes to 1,125 extremely low- to moderate-income persons, exceeding the projected goal by 125%. The ability to exceed their proposed goal was related to increased demand in the *MLK* service area, case workers directing clients to the food services offered by *MLK* and United Way referring more clients to *MLK* for the supplemental grocery and food boxes.

St. Paul's Community Center (SPCC) provided 1,183 unduplicated persons with lunch through their meal program. They were able to complete 93% of their projected proposed outcomes. This ensured that homeless and/or LMI persons were provided at least one nutritious hot meal a day within the central city.

Helping Hands of St. Louis, one of the major food pantries located in the East Toledo area, provided groceries on a monthly basis to 1,790 persons, accomplishing 102% of their projected goal. In addition, *Helping Hands* also provided 666 hygiene kits, 466 homeless kits, 69,402 meals, and 2,518 bags of groceries.

Medium Priority Goal: Enhance Access to Health Services, Including Early Childcare

As a recipient of CDBG, *Neighborhood Health Association of Toledo, Inc. (NHA)* provided primary and preventative healthcare services to 6,435 persons, exceeding the proposed outcome by 43% over projection. Exceeding the proposed outcome was due to Toledo continuing to experience a higher than national unemployment rate causing a larger number of persons to be without medical coverage. A need to seek optional health care provisions for them and their family members became necessary. Through *NHA's* efforts, extremely low and low- income persons improved their access to healthcare.

Medium Priority Goal: Legal Assistance for Housing/Landlord Tenant Relations

Both efforts below meet the HUD-defined objective of promoting Decent Housing and also the HUD-defined outcome of Availability/Accessibility.

As a CDBG sub-recipient, *Legal Aid of Western Ohio, Inc. (LAWO)* assisted 105 low- to moderate-income persons residing within the City of Toledo with comprehensive legal services to maintain affordable housing.

Adelante, Inc. provided low- to moderate-income tenants with mediation services to settle rental-housing disputes. Adelante provided landlord/tenant mediation for 38 persons. After careful review of the proposed outcome by the DON, the outcome indicator was changed effective March 13, 2013 from 200 persons to 20 persons to more accurately reflect the mediation progress and results.

Advocates for Basic Legal Equality, Inc. (ABLE) was a Homelessness Prevention and Rapid Re-Housing Program (HPRP) sub-grantee of the COT and received HPRP dollars to provide legal assistance to two special-needs populations: homeless persons and those persons at risk of homelessness. ABLE assisted clients as follows: eviction prevention/eviction delayed, Ohio Works First benefits preserved, veterans benefits/rights increased, affordable housing obtained through transfer or relocation, Supplemental Security Income benefits obtained, preserved/obtained Medical benefits/rights, food stamp benefits/rights preserved, rights to decent/habitable housing enforced, redress for illegal/unfair charges by landlord, SSDI benefits/rights obtained, corrections made to rental accounts, monetary benefits and awards to clients including damages, debt write-off, reduced fees or penalties and other awards. The HPRP report for July – Sept. 2012 shows that 62 persons were provided legal assistance.

3. City Infrastructure

High Priority Goal: Address Growing Flood and Drainage Issues in Low- to Moderate-Income Areas

Low Priority Goal: Replace Old Sewer, Water and Gas Lines in Low- to Moderate Income Areas

Low Priority Goal: Upgrade/Replace Street Lights

Federal funds were not allocated in PY 2012 for any of the above priorities.

4. Eliminate Homelessness

High Priority Goal: Permanent Supportive Housing

Family Outreach Community United Services (FOCUS), funded for scattered-site permanent housing, provided 87 unduplicated persons 24,076 total nights of service of safe decent housing throughout the city. The average household length of stay was 858 days. Sixty-two percent exited to permanent housing and 23% experienced an improvement in income. Of clients who eventually exited, 46% left due to positive reasons as defined by the local Homeless

Management Information System (HMIS) standards. *FOCUS* mimics a housing first model promoted by HUD as a viable and cost-effective solution to end homelessness.

High Priority Goal: Homelessness prevention

The Homelessness Prevention and Rapid Re-housing (HPRP) grant ended in October 2012. The Quarterly Performance Report for the third and last quarter of HPRP (July – September 2012), reported that 245 persons in 106 households received rental assistance, security and utility deposits, and utility payments. HPRP participants also received an intermediate level of case management, housing search and placement assistance and legal services as part of their individual service plans. HPRP continued to actively conduct centralized intake for potential participants as capacity allowed. During the last and final quarter of HPRP, 193 persons left the program, of which 189 went to permanent destinations, while the destination of four persons was unknown.

As a result of changes due to the HEARTH Act, local third-party partners no longer received ESG funds to individually undertake homelessness prevention activities. In order to continue with the success of and lessons learned from HPRP, ESG funds were allocated under a collaborative Continuum of Care driven project called Project Home.

In January 2013, ESG funds allocated for Direct Financial Assistance (DFA) began assisting individuals assessed to be eligible through 2-1-1 Coordinated Assessment. ESG funds for financial assistance (rent, utilities, etc.) to individuals were not utilized until 2013 due to the requirement that all Ohio Development Services Agency (ODSA) money allocated towards direct financial assistance under the Homeless Crisis Response Program be expended by December 31, 2012. ESG case management to individuals for rapid re-housing administered by TASC of Northwest Ohio, however, began on June 1, 2012. Under the Project Home rapid re-housing program, ESG funds assisted 793 unduplicated individuals during the reporting period. Project Home provided a total of 56,570 service-nights or 762 household service-months. The average length of stay was 106 days with 91% of persons exiting to permanent housing. Eighty-one percent of households exited Project Home with non-cash benefits with 38% of adults employed at exit. Under rapid re-housing, 79% of individuals exited under positive discharge reasons, while only 6% of clients exited the program due to negative discharge reasons.

Beginning in February 2013, homelessness prevention assessments were undertaken on 173 individuals, in which 20 were determined to be eligible for direct financial assistance. Mainstream resources were provided for 92 assessments, which could include short term housing solution, transitional housing, permanent supportive housing, etc.

Medium Priority Goal: Supportive Services

AIDS Resource Center Ohio (ARC Ohio) provided case management and direct financial assistance to 423 persons with HIV/AIDS. Their intent in providing services was to ensure that this population avoided homelessness. The net effect of making these services available was that 91% of the 423 persons with HIV/AIDS served avoided homelessness. This outcome was higher

than projected as ARC anticipated that 85% of persons with HIV/AIDS would avoid homelessness.

Low Priority Goal: Transitional/Temporary/Emergency Shelters

The City of Toledo funded five emergency shelters with CDBG and ESG funds during the 2012 program year:

Beach House provided a total of 7,679 nights of service to 205 unduplicated persons with an average length of stay of 38 days. Of those households that exited *Beach House*, 88% exited to permanent or temporary housing. Sixty-one percent of households exited due to positive or neutral reasons. Twenty-one percent of households experienced an improvement in income, while 80% exited with non-cash benefits.

Catholic Charities (La Posada) provided 11,734 nights of shelter to 239 unduplicated persons with an average length of stay of 43 days. Of those households that exited *La Posada*, 83% exited to permanent or temporary housing. Forty-nine percent of households left due to positive or neutral discharge reasons. Ninety percent of households exiting *La Posada*, however, left with non-cash benefits, with 18% experiencing an improvement in income.

Family House provided a total of 22,980 nights of service to 665 individuals with an average length of stay of 34 days. Of those households that exited *Family House*, 79% exited to permanent or temporary housing. Fifty-eight percent of households exited due to positive or neutral reasons. Twelve percent experienced an improvement in income, while 82 % exited with non-cash benefits.

St. Paul's Community Center's emergency shelter provided a total of 12,513 nights of service to 338 unduplicated persons with an average length of stay of 35 days. Forty-nine percent of households left for permanent or temporary housing. Only 38 % of persons exiting *St. Paul's* left for positive or neutral reasons, with 61% exiting with non-cash benefits.

Lastly, the *Young Women's Christian Association (YWCA)*, through its Battered Women Shelter, provided safe 30-day emergency shelter and crisis services to 342 victims of domestic violence. The YWCA does not report to the local HMIS database due to federal restrictions on disclosing personally identifying victim information. The average length of stay at the Battered Women's Shelter was 35 days.

The City of Toledo funded three transitional housing programs with CDBG and ESG funds during the 2012 program year:

Aurora Project provided a total of 6,589 nights of service to 64 unduplicated individuals with an average length of stay of 123 days. Sixty-eight percent of households exited to permanent housing. Fifty-three percent of households left for positive or neutral reasons, with 82 % exiting with non-cash benefits.

Harbor House provided a total of 3,049 nights of service to 33 unduplicated individuals with an average length of stay of 112 days. Eighty-five percent of households exited to permanent housing. Fifty-eight percent of households left for positive or neutral reasons, with 88 % exiting with non-cash benefits.

Bethany House assisted 79 individuals during the program year. Bethany House does not report to the local HMIS database due to federal restrictions on disclosing personal identifying victim information. Of the 16 families (16 adult survivors, 32 children) that exited the program, 14 families obtained permanent housing, one family returned to the abuser and one single is unknown. Eight of the 16 adults gained employment, six increased benefits (TANF, SS and Child Support), one remained at the same income level and one adult's outcome is unknown. From July 1, 2012 through December 31, 2012, six families with 16 children (22 persons) exited the program. Five families obtained and currently maintain permanent housing. One family moved in with a relative and her housing status is unknown.

5. Economic Development - Job Creation

High Priority Goal: Educate and Retrain Workforce with Needed Job Skills

United North Corporation (UNC), through its Financial Opportunity Center (FOC), provided 66 persons with training and ongoing case management services to develop financial management skills, thus improving household stability and exceeding its proposed outcome of 30 people. Increased staffing at the FOC allowed *UNC* to exceed its proposed outcome by 45%. *UNC* worked with Owens Community College, Job and Family Services, *The Source*, and other service providers in the development of work plans for assisted persons.

High Priority Goal: Technical/Financial Assistance to Small Businesses to Create and Retain Jobs

UNC provided technical assistance to commercial businesses to create vital sustainable neighborhoods with mixed-use districts. *UNC* assisted 20 businesses and reported a Data Universal Numbering System (DUNS) number for those businesses, meeting their outcome of 20. In total, *UNC* assisted 177 businesses (with or without DUNS numbers reported) in the UN target area. Businesses were assisted with marketing, signage/zoning, business recruitment, retention, loans and grants. The organization exceeded its projected output goal.

Toledo-Lucas County Plan Commission processed 307 requests for service in low- and moderate-income areas in PY 2012-2013. Their activities promoted a more suitable living environment for Toledo residents, increasing the overall sustainability of the COT. The *Plan Commission* exceeded its proposed outcome of 82 requests by 225 resulting in a 275% increase. This increase was due to the implementation of a new tracking system where each completed activity is entered into a specific category resulting in a more accurate activity count.

UpTown Association, Inc. (UTA) provided business technical assistance to 12 businesses and three entrepreneurs with interests in the UpTown commercial district, providing economic

growth and improvement of the businesses located in the targeted area. Those assisted include: Ebiz Talent (entrepreneur), Crossfit Lifesport, Hillcrest Apartments, Toledo Metro Federal Credit Union, Executive Towers (Monarch Investment and Management Group), Odella's Wash Land, Republic Development, Park Lane Apartments, Cherry Street Mission, First Alliance Church, Clair Kirschner (independent artist), J.P. Smith (attorney), Catholic Club, and Dean and Sons. Additional businesses were assisted with concerns regarding vacant building board-ups, broken windows, graffiti and garbage removal.

The *Department of Development (DOD)* subcontracted with the Lucas County Improvement Corporation (LCIC) to provide technical assistance to 30 businesses. The LCIC's name was changed to Lucas County Economic Development Corporation (LCEDC). The DOD and LCEDC met the goal of assisting 30 businesses.

NeighborWorks® Toledo Region (NTR) objective was to achieve economic growth and improvement for five businesses assisted in the South Toledo District. NTR assisted four businesses, not fully meeting its objective.

High Priority Goal: Secure New Capital Investment

The *Department of Development (DOD)* planned to issue Enterprise Development Loans (EDL) to four companies. While no EDLs were completed in PY 2012-2013, the work performed will allow for the EDL's to move forward early in PY 2013-2014. By the end of PY 2012, two EDL applications were in process and are in the final stage of approval.

Low Priority Goal: Develop Urban Agriculture/Vertical Gardens

UNC partnered with *Toledo GROWs* to converted blighted/vacant lots into beautiful/productive community gardens (Oneida City Farm) by providing resources (seeds, plants and soil improvements), educational opportunities and ongoing support to citizens in targeted neighborhoods. *UNC and Toledo GROWs* served 205 persons and met 91% of its proposed outcome indicator of 225 persons.

Low Priority Goal: Develop Business Incubators

Federal funds were not allocated to this activity for the 2012 program year.

6. Enhance Housing Choice

Medium Priority Goal: ADA Accessibility, Including Helping Seniors Stay in Place

Preferred Properties, Inc. continues to complete accessibility modifications and rehabilitation of five rental-housing units within the City of Toledo occupied by very low- and low-income persons with disabilities. The timeline for completion is projected for February 2014.

Medium Priority Goal: Improve Outreach of Housing Programs and Services

The DON actively participated in community, neighborhood and block watch meetings and made presentations to many organizations and groups in the community. At these meetings, the DON explained and discussed available housing programs. Additionally, a tour for potential buyers of available NSP homes was held and additional information on the NSP program was provided.

Medium Priority Goal: Fair Housing

The *Toledo Fair Housing Center (FHC)* is dedicated to affirmatively furthering fair housing. Their goal: to ensure residents shall have housing choices regardless of race, color, religion, sex, disability, familial status, national origin, ancestry, military status (State of Ohio), or sexual orientation (City of Toledo). Their services extend protection to homebuyers and homeowners from unfair lending practices through community education on predatory lending.

The *FHC* investigated 422 new complaints in 2012 concerning housing discrimination within the City of Toledo. Twenty-two carryover cases were not resolved in 2011. As a result, a total of 444 new and carryover discrimination cases were addressed in 2012. All 444 cases were successfully resolved (a 5% increase over their proposed outcome). *FHC* also monitored 11 settlement agreements within the City of Toledo, with 100% maintaining compliance with the settlement.

The *FHC* continues the work towards the implementation of the 2010-2015 Fair Housing Action Plan based on the most recent Analysis of Impediments conducted in 2010. For PY 2012-2013, the *FHC* submitted quarterly reports to the DON on the community's progress towards the elimination of impediments to fair housing. See full report update on page 23.

The *FHC* networked with local agencies to direct, empower and educate consumers and housing providers about fair housing rights and obligations. *FHC* held 8 trainings, made presentations and was represented at various festivals and local events, reaching 546 participants (exceeding their proposed outcome in terms of number of people reached). Participants in the above listed events received information on their rights and obligations under the provision of fair housing laws and professionals were trained also in fair housing laws.

7. Improve Housing Affordability

High Priority Goal: Foreclosure Prevention

NeighborWorks® Toledo Region's Homelessness Prevention, Foreclosures Intervention Program objective is to prevent homelessness by improving housing affordability through the renegotiation or restructuring of debt related to the principal residence of low- to moderate-income homeowners. *NTR* conducted homebuyer education sessions and performed mortgage-lending activities to provide direct financial assistance to homebuyers or to mitigate foreclosure. *NTR's* outcome indicator for PY 2012 was 75 people. The actual outcome for PY 2012 was 65 people were assisted in achieving a positive outcome of mortgage rescues with mortgage loans or

grants being provided to prevent foreclosure and preserve overall homeownership. *NTR* achieved 87% of the outcome goal.

Medium Priority Goal: Rental Assistance

The *Division of Housing and Neighborhood Development* did not utilize HOME funds toward tenant-based rental assistance (TBRA) for the period July 1, 2012 through June 30, 2013. However, it aggressively worked with the Toledo Lucas County Homelessness Board (TLCHB) to develop a partnership centered on direct financial assistance for homeless persons. This effort culminated in a contract to assist a special-needs population (homeless persons) with direct financial assistance for rent, security deposit, and utility deposit for an average of 25 households over the next three years, beginning in program year 2013.

Medium Priority Goal: Homebuyer Assistance

The *Housing Division of the DON*, in its continued efforts to maintain and expand homeownership within the city, provided down-payment assistance (which may include closing costs) to households during the 2012 program year using HOME funds. The total number of households provided down-payment assistance was 21. The homebuyer assistance program benefited households whose incomes do not exceed 80% AMI. Assistance to first-time homebuyers required homebuyer counseling prior to the purchase of the home.

Utilizing NSP1 funds, the *Housing Division of the DON* acquired and rehabilitated foreclosed properties to provide affordable housing for households at or below 120% AMI. The Housing Division of the DON sold nine units in PY 2012. (A total of 94 units were proposed for the four years of NSP1 funding.) Down-payment assistance was provided to all who purchased these homes.

Through NSP2, the *Housing Division of the DON* acquired, rehabilitated and sold four housing units during the July 1, 2012 through June 30, 2013 period. (A total of 26 units were proposed for the three years of NSP2.) Down-payment assistance was provided to all homes sold. NSP2 funds were concentrated in tipping point neighborhoods to stem the tide of foreclosures in those neighborhoods.

Under NSP3, the *Housing Division of the DON* sold five units to households at or below 120% AMI. The units were acquired and rehabilitated, or redeveloped with NSP3 funds. Down-payment assistance was provided to all homes sold.

In Program Years 2010 and 2011, *Friendship New Vision (FNV)* was funded through CDBG for two activities involving the acquisition, rehabilitation and selling of 11 housing units to LMI households. These activities had remained open at the end of PY 2011 and are now closed since *FNV* sold nine houses (four on rent-to-own agreements) to LMI families. *FNV* accomplished 69% of its proposed outcome.

NeighborWorks® Toledo Region's Mortgage Lending Project objective is to provide direct financial assistance to first-time, low- and moderate-income homebuyers or homeowners, after

providing housing education and counseling in order to increase homeownership. *NTR* served 18 households, meeting 90% of its outcome of 20 households (homebuyers/homeowners).

Adelante, Inc., funded through CDBG, provided homeownership counseling services to economically disadvantaged, Limited English Proficient (LEP) and/or Spanish speaking only individuals with the goal of increasing citywide homeownership. *Adelante* projected 80 persons would be served with the actual program outcome being 86 persons served, exceeding their goal by 8%. Through this activity, *Adelante's* clients learned to improve their financial skills related to saving money, repairing credit and improving their credit scores. The second part of the proposed outcome, to become a homeowner, could not be determined at the time of this report. While a client may achieve the first part of the outcome, the process to attain a home may not occur during the same funded year. *Adelante* continues to work with clients until they are ready to become homeowners, as applicable.

Very Low Priority Goal: Assist Mobile Home Residents Purchase Their Units

Federal funds were not allocated to this priority for the 2012 program year.

8. Improve Neighborhood Conditions

Medium Priority Goal: Vacant Lot Improvements

The *Real Estate Division* of the *DOD*, under its land reutilization program, was successful in selling 68 parcels to private owners, which are then brought back to productive status by the new owners. These efforts promote a more suitable living environment and meet the HUD-defined outcome of sustainability through property maintenance/enhancements. The proposed goal for this activity was ten parcels. Due to the marketing of this program by grass roots organizations, the *Real Estate Division* exceeded its projected outcome for this activity by 580%.

The *Real Estate Division* of the *DOD* also retained ownership of another 26 parcels of land that were leased by individuals and private organizations who provided ongoing maintenance for these parcels at no additional cost to the city. These efforts promote neighborhood beautification by volunteers who may potentially qualify as purchasers in the future. The proposed outcome of this activity was to lease six parcels. The projected goal was exceeded by 333%. The growth of urban community gardens within the city contributed to the *Real Estate Division* exceeding its goal.

NSP2 funds assisted in new housing developments also using vacant parcels. During the PY 2012, the construction of one new house started. In addition, NSP2 funds were included in development of two multi-unit housing redevelopments that were completed during the year. Fifty units in the new development were set aside to address the housing needs of households whose incomes do not exceed 50% AMI. Two new houses under construction were completed during the PY 2012. One of the houses was sold during the same year. The new houses will benefit households whose incomes do not exceed 120% AMI. The two new houses were built on vacant parcels.

Medium Priority Goal: Eliminate Lead Hazards

The DON partnered with the Lucas County Regional Health District (LCRHD) to administer and manage their Lead-Based Paint Hazard Control Program (LBPHCP) funded by a HUD Grant. In PY 2012, the DON processed 56 lead intakes of which 17 have completed enrollment eligibility. The goal is to provide interim control lead abatement and clearance of 165 housing units through June 30, 2015.

Medium Priority Goal: Green Technology such as Community Gardens, Rain Gardens, Alternative Energy Systems, LEED Certification

Federal funds were not utilized in PY 2012 for this goal.

Medium Priority Goal: Environmentally Clean Brownfield Sites

The COT, in collaboration with the *UpTown Association, Inc. (UTA)* is in the process of establishing a viable, sustainable neighborhood through the development of a 2.5-acre park in the heart of the *UpTown* district and the renovation of a four-story building adjacent to the park through remediation of environmental hazards via a two-phase process. The two phases include:

- Phase 1 – environmental remediation (asbestos removal and removal of underground storage tanks) completed August 2012;
- Phase 2 – finalize the appropriate use of park space and building; two additional jobs will be created from this activity.

The COT contracted with *UTA* to assist in the creation of two LMI jobs through the creation of the park. This activity remained open at the end of PY 2012 due to Phase 2 currently ongoing. The DON has met with *UTA* and has extended their contract an additional year.

The *DOD*, in partnership with *Toledo's Division of Environmental Services*, is also working on the *UpTown Signature Park*. The *Division of Environmental Services* completed the environmental cleanup of the site. The Ohio Development Services Agency (ODSA) awarded \$1,500,000 to the project. Additionally, \$250,000 was contributed from the COT's Environmental Services, \$100,000 was contributed by Mercy College, \$15,000 from LISC, \$35,000 from the *UpTown Association*, and \$100,000 was committed by the DON. The redevelopment is scheduled to be complete by the fall of 2014.

The *DOD* staff assisted one business with obtaining tax and real estate incentives needed for the environmental remediation and redevelopment of a commercial lot. A commercial building on the site will house Hull & Associates (an engineering firm). The building is expected to be completed in 2014.

Low Priority Goal: Rodent Abatement

IN PY 2012, the *LCRHD* inspected, for rodent activity, 822 housing units that had been issued a housing violation. The Health District exceeded its proposed outcome of 300 housing units by 174%. It should be noted that if a housing unit is not torn down within 60 days of the scheduled demolition, the housing unit must be re-inspected and re-baited.

9. Enhance Neighborhood Business Districts

Medium Priority Goal: Financial Incentives to Retain Existing and to Recruit New Businesses

Low Priority Priority Goal: Infrastructure & Streetscape Improvements

Federal funds were not utilized for the above priorities in PY 2012.

10. Transportation Issues

Low Priority Goal: Improve Streets, Roads and Sidewalks

Federal funds were not utilized for this activity in the program year 2012.

11. Enhance Downtown and Warehouse District

Low Priority Goal: Expand Façade Program

Federal funds were not utilized for this priority in the program year 2012.

III. ASSESSMENT OF ANNUAL PROGRESS

1. Affirmatively Furthering Fair Housing

The City of Toledo, in affirmatively furthering fair housing choice, commissioned the Fair Housing Center (FHC) to develop a full-scale analysis and strategic planning process to develop the Five-Year (2010-2015) Annual Analysis of Impediments (AI) and corresponding Fair Housing Action Plan, the benchmark towards the elimination of the community's impediments to fair housing choice.

To comply with the requirements of the Consolidated Plan regulation (24 CFR 91.225), the City of Toledo, through the FHC, conducted four community forums which included input from other local agencies, units of government, banks, housing providers, community development corporations, and community organizations ensuring that the process for identifying impediments was broad-based.

The AI is used as a basis for the development of a Fair Housing Action Plan. The AI Plan, beginning on the following page, summarizes the impediments to fair housing and the progress made on the action steps taken to resolve any impediments. In conjunction with representatives

from the City of Toledo, the FHC identified nine areas that require particular attention and action in order to remedy impediments to fair housing. They are as follows:

- Rental
- Foreclosure and Foreclosure Prevention
- Assisted Housing
- Zoning and New Construction
- Fair Housing Awareness
- Real Estate Sales
- Lending and Finance
- Homeowners Insurance
- Advertising Violations

Other impediments that were frequently mentioned, but not included within the AI were: the insufficiency of the transportation system, the need for locally-driven solutions and more collaborations, lack of education and information sharing, and inaccurate public perceptions. The COT, in conjunction with the FHC, implemented mandatory training sessions for all Third-Party Partners in PY 2012 - 2013. The objective of the trainings is to broaden the understanding of fair housing issues and improve reporting to the FHC.

The AI is to be utilized as a foundation not only to develop a Fair Housing Action Plan, but also to assess a community's performance in best accomplishing solutions and expanding equal housing opportunities. Regionalism, as an approach to housing issues, can positively affect results due to the similarities (and disparities) as it relates to housing conditions and practices.

Specific goals, action steps, and the parties that will be held accountable for the actions are included in the chart below along with relevant information for reference on the progress made to date.

ANALYSIS OF IMPEDIMENTS – Progress Report

Section	Goals/ Objectives 2010-2015	Action Steps	Primary Responsibilities/ Partners	Relevant Information
Rental	Improve landlord-tenant relationship in order to promote long-term, sustainable housing of choice.	Establish a landlord-tenant agency to address issues arising between housing providers and tenants.	City of Toledo	The COT contracted with Adelante, a local social service agency, to provide landlord-tenant mediation services in PY12. The program is in its initial stages of development and will be implemented in conjunction with other community agencies. Adelante's program will continue in PY13.
		Conduct a feasibility study to determine need for and scope of landlord training. Determine, as part of study, whether training should be mandatory.	Landlord-Tenant Agency	
		Inform providers of rental housing of rights and responsibilities through training of landlords of multi-family units containing 4+ units.	Landlord-Tenant Agency	
Rental	Ensure full enjoyment of rental housing units for disabled tenants.	Assist clients with reasonable accommodation and modification requests.	Toledo FHC	The FHC continually responds and follows up on complaints.

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Section	Goals/ Objectives 2010-2015	Action Steps	Primary Responsibilities/ Partners	Relevant Information
Rental	Ensure full enjoyment of rental housing units for disabled tenants.	Investigate reasonable accommodation denials or complaints.	Toledo FHC	
		Investigate reasonable modification denials or complaints.	Toledo FHC	
		Assist clients with complaint process as needed.	Toledo FHC	
Rental	Ensure equal access to housing regardless of race.	Investigate complaints of racial discrimination.	Toledo FHC	
		Conduct testing using HUD-approved methodologies.	Toledo FHC	
		Where indicated, file administrative complaints with HUD/OCRC.	Toledo FHC	
Foreclosure and Foreclosure Prevention	Help to reduce and/or prevent foreclosures, thereby stabilizing area neighborhoods.	Provide consumers with foreclosure prevention resources including, but not limited to: education, emergency mortgage assistance, and loan modifications.	Toledo FHC, NTR, City of Toledo, ESOP, Lucas County and NODA	Agencies continually work on providing resources as needed. Since the start of PY12, more than 200 appointments for counseling and education were conducted by FHC. Lucas County, through its "Foreclosure Prevention" brochure, lists agencies that provide foreclosure-related services. ESOP provides foreclosure prevention counseling and other resources and oversees HAMP and Restoring Stability programs which assist homeowners who are unable to remain in their homes and sell their properties.
		Education: Foreclosure prevention counseling, financial management training, credit counseling, mortgage rescue scam identification.	Toledo FHC, NTR, and NODA	
Foreclosure and Foreclosure Prevention	Help to reduce and/or prevent foreclosures, thereby stabilizing area neighborhoods.	Emergency mortgage assistance: grants from funding sources such as Federal Home Loan Bank, etc.	Toledo FHC and NTR	The FHC resolved the cases of more than 50 families in need of assistance.
		Loan Modifications: working with lenders/servicers through such programs as Making Home Affordable.	Toledo FHC, NODA, ESOP, Consumer Credit Counseling Services (CCCS) and NTR	The FHC completed more than 35 loan modifications.
Foreclosure and Foreclosure Prevention	Mitigate negative impact of foreclosures on targeted neighborhoods.	Acquire, rehab and sell foreclosed properties in NSP-designated "tipping point" neighborhoods.	City of Toledo and NSP partners	Through NSP1 & NSP2, the COT renovated at least 64 houses and sold or leased 40 units in "tipping point" neighborhoods. Work continues with NSP3.
		Strategic acquisition and demolition of unsalvageable foreclosed properties.	City of Toledo and NSP partners	NSP1 (which ended in March 2012) funded the demolition of 417 units. NSP2 (which ended in Feb. 2013) funded the demolition of 180 units. NSP3 continues to work on demolitions with 25 units demolished so far.

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Section	Goals/ Objectives 2010-2015	Action Steps	Primary Responsibilities/ Partners	Relevant Information
Foreclosure and Foreclosure Prevention	Address issues faced by families who have been displaced due to foreclosure.	Provide alternative housing options.	United Way 2-1-1, Homeless Shelters, Transitional Housing, LMHA, City of Toledo and NSP partners	The partners continue to work to provide housing options. From Oct. – Dec. 2012, 135 of LMHA's Housing Choice Voucher Program participants became homeowners.
		Connect families with community resource services.	United Way 2-1-1	Ongoing
Assisted Housing	Expand availability of Section 8 housing.	Effectively market the Section 8 program and its benefits to landlords.	LMHA	LMHA added more than 43 landlords to this program. Ongoing.
		Negotiate for Section 8 units in settlement agreements to increase the number of units available for Section 8 housing in historically closed communities.	Toledo FHC, OCRC	Work continues in this area, although no Section 8 vouchers have been negotiated.
		Encourage HUD to provide sufficient funding to allow LMHA to properly carry out the voucher program.	Toledo FHC, LMHA and City of Toledo	HUD's funding for the Housing Choice Voucher Programs increased by 2.44% for LMHA's PY 2013.
Assisted Housing	Promote reasonable access of the re-entry population to assisted housing opportunities.	Review current policies and discuss the feasibility of tiered rentals and transitional housing for people re-entering society, as well as the development of distinct criteria for different offenses.	Toledo FHC, Lucas County Re-entry Coalition and LMHA	Meetings are held with ex-offenders the first Wednesday of the month to offer an overview of LMHA's program and answer individual questions.
Zoning and New Construction	Adopt a single, consistent occupancy standard in order to eliminate uncertainty and provide better guidance to fair housing practitioners, housing providers, and consumers.	Identify existing discrepancies among various City of Toledo codes, policies and procedures.	City of Toledo	The discrepancies persist; however, resolution would require changes to the codes and/or building standards over which the City lacks control.
		Identify existing discrepancies between City and County codes, policies and procedures.	City of Toledo and Lucas County	The discrepancies persist; however, resolution would require changes to the codes and/or building standards over which the City lacks control.
		Convene appropriate and authoritative entities for the development and adoption of a consistent standard.	City of Toledo, Lucas County, and Toledo FHC	The discrepancies persist; however, resolution would require changes to the codes and/or building standards over which the City lacks control.
Zoning and New Construction	Ensure that appropriate zoning and permitting decisions are made regarding housing, both established and new, for individuals with disabilities.	Toledo-Lucas County Plan Commission will provide the Toledo Fair Housing Center with notification of any permit applications filed concerning housing for individuals with disabilities.	Toledo-Lucas County Plan Commission	Ongoing. One notification provided.
		Monitor permit applications and the resulting decisions for compliance with fair housing legislation, especially regarding design and adaptability provisions of the Fair Housing Act, and challenge any questionable denials.	Toledo FHC	Ongoing, as needed.

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Section	Goals/ Objectives 2010-2015	Action Steps	Primary Responsibilities/ Partners	Relevant Information
Fair Housing Awareness	Ensure that the information regarding fair housing is correct and consistent.	Review, update, and revise City of Toledo Municipal Code discrimination ordinances to include all protected classes.	City of Toledo and Toledo FHC	In process of reviewing
		Review, update, and revise Fair Housing Center materials to include local and state protected classes (as needed).	Toledo FHC	Accomplished.
		Review, update, and revise OCRC materials to include all protected classes.	OCRC and Toledo FHC	The FHC will work with the OCRC to include the protected classes currently missing from their website.
Fair Housing Awareness	Increase awareness of fair housing laws and the entities responsible for their enforcement.	Provide outreach to housing industry professionals and public and private organizations.	Toledo FHC	Ongoing
		Provide outreach to the general public.	Toledo FHC	Ongoing
		Provide outreach in the form of trainings, presentations, resource booths, printed materials, media outlets, and website.	Toledo FHC	Ongoing
		Identify fair housing outreach materials requiring translation into languages other than English and explore possible funding sources to complete task.	Toledo FHC	Reasonable Accommodation and Rental market brochures were translated into Spanish. Efforts will continue in 2013 to expand translation services.
Fair Housing Awareness	Promote more extensive collaboration and increase education and information sharing.	Identify entities that have an influence on impediment areas and facilitate in-person and electronic communications between these entities.	Toledo FHC	Ongoing participation in meetings and electronic communications with entities that have influence on impediment areas.
		Explore utilization of social networking sites/social media marketing.	Toledo FHC	Accomplished: Facebook page and Twitter account.
Fair Housing Awareness	Decrease the incidence of fair housing violations in condominium bylaws.	Conduct an audit of publicly-recorded condominium documents for violations of the Fair Housing Act.	Toledo FHC	The audit and a draft report with its findings and recommendation have been completed.
		Offer condominium associations' fair housing training.	Toledo FHC	Toledo FHC is developing training materials.
Real Estate Sales	Increase affordable housing opportunities in traditionally underserved communities.	Conduct neighborhood tour for housing industry professionals to highlight housing opportunities.	Toledo FHC and City of Toledo	No longer an activity in the FHC work plan per the City of Toledo. The COT held a tour in the Spring of 2013.
		Evaluate viability of Toledo Board of REALTORS Certified Affordable Real Estate Sales professionals program and better incentivize participation.	Toledo Board of REALTORS and Toledo FHC	Accomplished in 2011.
Lending and Finance	Increase community lending opportunities through Community Development Financial Institutions (CDFIs).	Encourage increased funding for the CDFI Fund through the U.S. Department of Treasury.	Toledo FHC, NODA and NTR	Ongoing
		Encourage conventional lenders to support CDFIs through low/no-interest loans.	Toledo FHC, NODA and NHS	Ongoing

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Section	Goals/ Objectives 2010-2015	Action Steps	Primary Responsibilities/ Partners	Relevant Information
Lending and Finance	Increase community lending opportunities through Community Development Financial Institutions (CDFIs).	Provide input to regulators regarding the activities of conventional lenders in order to strengthen compliance and support of CRA.	Toledo FHC	Accomplished: Information released at conference in Cleveland.
Lending and Finance	Expand banking and financing opportunities for the traditionally underserved and unbanked.	Work with community lenders and banks to develop a community-wide initiative to alleviate the dependency on check-cashing facilities and payday lenders.	Toledo FHC, Bank On, community lenders and banks	Accomplished: Program launched in 2011.
		Create a program to move consumers from "Check Systems" to conventional banking products.	Toledo FHC, Bank On, community lenders and banks	Accomplished: Program launched in 2011.
Homeowners Insurance	Provide the opportunity for quality, affordable full-replacement cost insurance policies in historically underserved communities.	Conduct systemic investigations of minimum age restrictions, minimum value restrictions and redlining.	Toledo FHC	Ongoing as needed.
		Conduct investigations of differential treatment in customer service issues and risk assessment of dwelling.	Toledo FHC	Ongoing as needed.
Homeowners Insurance	Provide the opportunity for quality, affordable full-replacement cost insurance policies in historically underserved communities.	Educate consumers and the community leaders, organizations, professionals and others who serve them regarding policies and practices of homeowners insurance providers, with special emphasis on the differences between full-replacement cost and market value policies.	Toledo FHC	Ongoing through distribution of information to professionals and the general public. A "Homeowners Insurance Consumer Tip Sheet" has been developed.
Advertising Violations	Decrease the presence, frequency, and dissemination of discriminatory language in the advertisement of housing.	Monitor area print media for fair housing violations, particularly race, familial status and disability.	Toledo FHC	Ongoing.
		Monitor internet for fair housing violations, particularly familial status, gender, national origin, sexual orientation, and race.	Toledo FHC	Ongoing.
		Conduct auditing and follow-up testing where necessary.	Toledo FHC	Ongoing, as appropriate.

Monitoring Process

The COT's DON is responsible for monitoring the implementation and progress of the Fair Housing Action Plan. The FHC is contracted by the city to take the lead role in addressing the impediments to fair housing and submits updates to the city with quarterly comprehensive monitoring. Reports include status of partnerships and activities with regulatory agencies and responsible parties identified as active partners in addressing the identified impediment areas in the Fair Housing Action Plan. The Fair Housing Action Plan is reviewed annually and updated to include programs and activities that will address the community's changing needs and priorities.

2. Affordable Housing

a. Comparison of proposed numeric goals

Information contained in the attached Table 1C, Summary of Specific Objectives, (as prescribed by HUD) summarizes the COT's objectives for PY 2012 - 2013 and the progress towards improving affordable housing goals.

As the data demonstrates in Table 1C, the COT and its partners have made significant progress in the areas of providing home repairs for senior citizens and individuals with disabilities; in preventing foreclosures through loans for LMI individuals; and in providing health services for low-income individuals and families. These activities have allowed citizens to maintain residency in and affordability of their homes.

Activities for the priority goal of acquisition and rehabilitation of units for re-sale continued to be one of the priorities as adjusted for the housing market conditions. Emphasis has been placed on demolition of blighted structures and redistribution of land for alternative productive uses. Efforts continue to be placed in assisting with rehabilitation projects for low -moderate-income homeowners, particular seniors and those with disabilities, helping to preserve homeownerships.

The *Division of Housing and Neighborhood Development* did not engage in tenant-based rental assistance programs; however, it worked with the Toledo Lucas County Homelessness Board (TLCHB) to develop a partnership centered on financial assistance for homeless persons. This effort culminated in a contract to assist a special-needs population (homeless persons) with direct financial assistance for rent, security deposit, and utility deposit for an average of 25 households over the next three years, beginning in program year 2013.

b. Number of households served meeting the Section 215 requirements for affordable housing

Table 3B, Annual Affordable Housing Completion Goals (as prescribed by HUD) on the following page, reports the completion goals for households served with HOME and CDBG funds during the PY 2012. ESG funds were not used for housing activities in PY 2012. All households served with federal funds were LMI individuals based on the MFI (Median Family Income) HUD limits. Under HOME, households of owner-occupied or rental units with federal funds met the requirements of Section 215. Section 215 is defined in 24 CFR 92.252 and 92.254 and indicates that housing units for acquisition must be: single family units; modestly priced (home does not exceed 95% of the median purchase price for the area); acquired by a low-income family; and the principal residence of the family for the period described in paragraph (a)(4) of 24 CFR 92.254. Resale and recapture requirements must meet regulations in 24 CFR 92.254. The overall housing goals listed on table 3B specifies the number of households assisted with units considered as affordable housing.

Of the total of 271 homeowners and 42 renters assisted with affordable housing using CDBG and HOME funds, their income levels were as follows:

<u>MFI</u>	<u>Homeowners</u>	<u>Renters</u>
0-30%	41%	35%
30-50%	40%	50%
50-80%	16%	15%

On the following page, the table 3B, *Annual Affordable Housing Completion Goals*, as prescribed by HUD, details the affordable housing goals and actual numbers for the PY 2012.

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Grantee Name: City of Toledo Program Year: 2012-2013	Expected Annual # of Units To Be Completed	Actual Annual # of Units Completed	Resources used during the period			
			CDBG	HOME	ESG	HOPWA
BENEFICIARY GOALS-Sec. 215 Only						
Homeless households			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households	64	46	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Beneficiaries	64	46	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
RENTAL GOALS-Sec. 215 Only						
Acquisition of existing units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation- existing units			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	20	20	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Rental	20	20	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HOME OWNER GOALS-Sec. 215 Only						
Acquisition of existing units			<input type="checkbox"/>	<input type="checkbox"/>		
Production of new units			<input type="checkbox"/>	<input type="checkbox"/>		
Rehabilitation- existing units	14	27	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Homebuyer Assistance	30	19	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Owner	44	46	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMBINED RENTAL AND OWNER GOALS-Sec. 215 Only						
Acquisition of existing units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation- existing units	14	27	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	20	0	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Homebuyer Assistance	30	21	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Combined Total Sec. 215 Goals	64	48	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OVERALL HOUSING GOALS (Sec. 215 + Other Affordable Housing)						
Annual Rental Housing Goal	53	42	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	199	223	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Overall Housing Goal	316	313	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c. Description of efforts to address worst case needs

The City of Toledo follows a non-displacement policy for all commercial or residential tenants in projects using federal, state and/or local funds for the following activities: demolition, rehabilitation, acquisition, or conversion of households, businesses, farms and non-profit organizations who occupy properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended. The Third Party notification of proposed use of federal funding Acquisition Application is used by the DOD and DON to ensure that owners and tenants are offered fair and consistent treatment through relocation planning. This makes certain that persons displaced or temporarily relocated are matched with appropriate resources.

d. Description of efforts to address the accessibility needs of persons with disabilities

The COT contracted with Preferred Properties, Inc. for PY 2012 - 2013 to provide housing modifications to accommodate special-needs populations. The COT also contracted with the East Toledo Family Center and EOPA to provide home repairs for the elderly and/or disabled.

3. Homeless and Other Special Needs

a. Reaching out to homeless persons and assessing their individual needs

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

During the period of July 1, 2012 to June 30, 2013, NPI made contact with and provided services to 539 individuals through its outreach. Of those individuals, 273 contacts became enrolled as PATH clients. PATH assisted 270 individuals in obtaining transitional, supportive or permanent housing.

b. Addressing the emergency or transitional housing needs of homeless persons

c. Helping homeless persons make the transition to permanent housing and independent living.

The DON works closely with the Toledo Lucas County Homelessness Board (TLCHB) in reducing and ending homelessness. In PY 2012, ESG and CDBG funds supported five

emergency shelters, three transitional housing facilities, the CoC-designated coordinated assessment program and one case manager for rapid re-housing and homelessness prevention.

The City of Toledo continued to remain committed to its Continuum of Care (CoC) goals and strategies as identified in the Consolidated Plan. Working in conjunction with the TLCHB and the CoC partners, transitional housing exits to permanent housing increased from 69% in PY 2011 to 74% in PY 2012, with 54 out of 73 households achieving a permanent housing outcome. Of those homeless persons who obtained permanent housing, 97% continued to remain housed for at least six months. Additionally, the number of persons employed at program exit for all program types tracked under HMIS exceeded our community's goal of at least 20%, with 279 out of 1,313 adults obtaining employment. While no new permanent housing beds for chronic individuals were created in the CoC this program year, the TLCHB will continue to work with agencies like FOCUS to convert existing transitional housing units to permanent supportive housing where possible. Lastly, the number of homeless households with children in 2013 (107) decreased 11% compared to 2009 (120).

One projected outcome identified in the CONPLAN was a reduction of the chronically homeless population by 15% over the five-year Consolidated Plan planning period. Point-in-Time (PIT) data collected on January 27, 2009 survey identified 312 chronically homeless individuals, while the 2013 PIT survey taken on January 29, 2013 identified only 149 chronically homeless individuals. This comes out to a 52% reduction in four years.

The two paragraphs above are clear evidence of the continuing progress towards the city's goal of ending homelessness in Toledo.

d. Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to be discharged from publicly funded institutions and systems of care.

In addition to working with the TLCHB and homeless service providers, the COT (through CDBG) funds many non-profit organizations with programs that assist citizens in maintaining their residence and avoid homelessness. Examples of such programs are: food (soup kitchens), owner-occupied rehab, rental assistance, home repairs to seniors and people with disabilities, foreclosure prevention, job training and education programs, among others. The COT also contracted with the AIDS Resource Center to provide services to people living with HIV/AIDS.

The COT, through the Toledo Lucas County Continuum of Care (CoC), maintains active communications with the health and foster care system and with correctional facilities to prevent homelessness when individuals leave their organizations. All organizations agreed to work together to identify and address barriers that may exist and have policies stating that individuals are not to be discharged into a homeless situation. The TLCHB has informed and educated community stakeholders on multiple occasions to call United Way's 2-1-1 if an individual is facing a housing crisis.

The City of Toledo continues to maintain an active role in strengthening the CoC with the goal of eliminating homelessness.