



Service Managers Housing Network

Response to the Ministry of Municipal Affairs and
Housing Regulation Amendments

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Saba Ferdinands
Manager
MMAH, Housing and Homelessness Policy Unit
14th Flr
777 Bay St
Toronto ON
M5G 2E5

John Ballantine
Manager
Ministry of Municipal Affairs and Housing
Municipal Finance Policy Branch
13th Flr
777 Bay St
Toronto ON
M5G2E5

The Ontario Municipal Social Services Association (OMSSA) and its Service Managers Housing Network (SMHN) appreciate the opportunity to provide input on the Ministry of Municipal Affairs and Housing considerations on changes to regulations governing housing provision and administration.

The attached feedback is provided within a number of important assumptions. Most importantly, the recognition that Consolidated Municipal Services Managers (CMSMs) and District Social Services Administration Boards (DSSAB) herein referred to as “Service Managers”, are simply not stakeholders.

Additionally, feedback on both amendments to the *Housing Services Act* and amendments to regulations under the *Municipal Act* have been provided to ensure a comprehensive consideration and understanding of OMSSA and service managers recommendations and positions on improving Ontario’s housing system.

CMSMs and DSSABs as Partners in the Modernization Effort

While we appreciate and understand that the government generally, and Ministry specifically, will engage in a broad consultation process, any changes proposed or considered within the current context of social and affordable housing (legislative, regulatory, policy etc.) must be undertaken with both OMSSA and Service Managers, specifically, at the table as critical partners, funders and decision makers within Ontario’s housing system.

Service Managers are orders of, and represent government, and are primary funders of the infrastructure and services that are under consideration both in this initial regulatory review as well as within the broader Long Term Affordable Housing Strategy (LTAHS) and the multi ministry modernization efforts under poverty reduction and benefits transformation.

Given the role of Service Managers and the complexity of, and the potential for far sweeping implications resulting from policy and program reform, Service Managers must be in lock step with the province, prior to and throughout policy consultations, development and decision making.

To ensure success on achieving the objectives of the LTAHS, Service Managers must be co-designers of the modernized social and affordable housing system in Ontario.

Foremost, in the current regulation review process, the ministry’s consideration to prescribe Service Manager decisions for reviews requested by housing providers is highly complex and fundamentally challenging. Overturning decisions, in many cases made by locally elected officials and the primary funders of the system, is inappropriate, unnecessary and undermines the role of local government.

OMSSA and SMHN do not support this proposal as currently considered.

Clarity in the Scope, Intentions and Implications of Regulation Reform

Given the lack of clarity within the content of the proposed regulatory changes, the feedback that OMSSA and SMHN are providing includes assumptions, in large part, on the potential municipal and DSSAB impacts and roles. We are also assuming that, in addition to maintaining the authority of Service Managers as orders of government and funders, that new responsibilities or roles being considered are appropriately and sustainably funded.

We look forward to the Ministry's next steps and engagement with OMSSA and Service Managers on housing modernization and the specifics of considerations and implementation.

An Exciting and Important Time for Housing in Ontario

The Ministry and all those working to ensure the vision of a better housing system that strives to ensure "every person has an affordable, suitable and adequate home to provide the foundations to secure employment, raise a family and build strong communities" should be recognized for the good and hard work underway. The current proposed changes address some of the long standing challenges the sector has identified and includes reflecting our advice and recommendations. But more detail and clarity is needed.

We have an important opportunity before us to make important strides in addressing the long-term sustainability of Ontario's housing system. OMSSA, SMHN and Service Managers look forward to engagement and our partnership in this effort.

Feedback

For ease of access to the recommendations provided by SMHN, feedback has been captured in the attached chart.

**Long-Term Affordable Housing Strategy Update
OMSSA's Service Manager Housing Network Response**

| LTAHS Theme: An appropriate and sustainable supply of housing | | | |
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| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Proposed Regulatory Amendments- Additional Considerations |
| <p>Inclusionary Zoning and Other Planning and Finance Tools</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> Proposed legislation to give municipalities/DSSABs the ability to require the inclusion of affordable units in development proposals. Proposed legislation to expand and enhance the range of land use planning and municipal finance tools to support the development of affordable housing in the private sector. | <p>Opportunities:</p> <ul style="list-style-type: none"> May enable local municipalities/DSSABs to require that affordable housing units be included in secondary plans. Expanded municipal financing tools may support additional affordable housing development. Local municipalities/DSSABs will be able to establish Municipal Capital Facilities by-laws. Affordable housing projects may be exempt or subject to preferred treatment at the Ontario Municipal Board, along with a different appeal options for affordable housing. The extension of the non-application of 21 year sub-division control to 99 years may simplify housing development and intensification projects. <p>Risks:</p> <ul style="list-style-type: none"> The local municipalities/DSSABs may not embrace inclusionary zoning due to concerns (i.e. not remaining economically attractive for development and losing competition to neighboring | <p>The implementation of inclusionary zoning in two-tier municipalities/DSSABs or DSSAB's should be considered. The Service Manager may not be the level of government enabled to implement inclusionary zoning in all instances.</p> <p>Development of the regulations and requirements for inclusionary zoning and municipal planning and finance system changes should be developed in consultation with both Service Managers, local municipalities/DSSABs and their respective municipal associations (e.g. OMSSA, AMO,ROMA, FONOM, NOMA).</p> | <p>Municipal Act – O. Reg. 603/06</p> <ul style="list-style-type: none"> Support for the proposed change to enable all municipalities/DSSABs, not just service managers, to enter into municipal housing capital facilities agreements and provide related financial assistance. <p>Municipal Act – O. Reg. 599/06</p> <ul style="list-style-type: none"> Support for the proposed change to expand municipalities/DSSABs' ability to provide financial assistance to Municipal Services Corporations to facilitate affordable housing. |

LTAHS Theme: An appropriate and sustainable supply of housing

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| | <p>municipalities/DSSABs). Opposition from the development community is also likely</p> <ul style="list-style-type: none"> Affordability for inclusionary zoning will need to be defined. The 100%/80% of CMHC Average Market Rent used for Federal Provincial Investment in Affordable Housing (IAH) program funding is too restrictive for market based affordability programs. The Province has indicated that there will be a requirement to track and report affordability over a prescribed period of time. Tracking could be onerous and/or costly. Conflicting land use regulations may result with reduced parking requirements. Reducing development review fees may have implications for municipalities/DSSABs. | | |

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| <p>Second Units</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> • Reduce development costs by requiring municipalities/DSSABs to exempt second units from development charges. • Amend Building Code standards to reduce construction costs. | <p>Opportunities:</p> <ul style="list-style-type: none"> • May support creation of more rental housing options. Second suites can also create an income source and increased affordability for homeowners. • New second suites should be safe with better planning if they are part of the original building plan. <p>Risks:</p> <ul style="list-style-type: none"> • Development charge (DC'S) exemptions represent a potential cost to municipalities/DSSABs, as exemption of DCs for second suites can mean recovery of costs from other revenue sources (e.g. property taxes). This can affect municipalities/DSSABs' credit rating. • Proposed Building Code revisions are unknown. More information is needed in order to respond. • In the context of the <i>Strong Communities through Affordable Housing Act, 2011</i>, municipalities/DSSABs must establish official plan policies and bylaw provisions permitting secondary units. There may be cost implications for municipalities/DSSABs permitting a larger number of suites that are exempt from development charges. | <p>Any changes to development charge requirements should be developed in consultation with both Service Managers, local municipalities/DSSABs and OMSSA.</p> <p>In particularly, the Province should consider how second unit development charges exemptions are structured in the legislation to avoid having to recover costs of associated infrastructure from the property tax base.</p> | |

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| | <ul style="list-style-type: none">• May be operational challenges for local municipalities/DSSABs to implement. | | |

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| <p>Amendments to the <i>Residential Tenancies Act, 2006</i></p> <p><u>Description:</u></p> <ul style="list-style-type: none"> Encourage small landlords to provide rental housing. Commitment to consult with stakeholders on amendments to reduce <i>Residential Tenancies Act</i> (RTA)-related administration. No further details provided. | <p>Opportunities:</p> <ul style="list-style-type: none"> May be an opportunity to encourage more rental housing, but more details are required to respond in an informed manner. <p>Risks:</p> <ul style="list-style-type: none"> RTA amendments are needed to support recent iterations of the Investment in Affordable Housing (IAH) program and post-Expiry of Operating Agreements (EOA) housing providers. | <p>Social and affordable housing exemptions in the RTA should be reviewed and amended to ensure that they meet the needs of Service Managers and housing providers as programs evolve.</p> <ul style="list-style-type: none"> Rent exemptions should broadly capture future initiatives delivered by Service Managers, without having to add new programs to O. Reg. 516/06. In the absence of broader language, the O. Reg. 516/06 needs to be immediately updated to reflect the IAH program. Exemptions specific to subsidized units should reflect a range of potential subsidies (not just RGI) and clarify that rent exemptions may apply in relation to changes in income or a termination of the subsidy. This will support housing providers who continue to partner with the Service Manager post-operating agreement expiry. | |
| <p>Support for the Non-Profit and Co-operative Housing Sector</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> Develop voluntary accreditation standards. Explore changes to the Ontario Competitive Financing Renewal Process to give housing providers and municipalities/DSSABs more flexibility to access refinancing. | <p>Opportunities:</p> <ul style="list-style-type: none"> If considered, standards must be developed in consultation with Service Manager and supported by appropriate implementation resources. In this case, accreditation standards may be helpful. However, greater details are needed. The value of refinancing tools will depend on their scope (e.g. expansion of the | <p>OMSSA and Service Managers support the provincial commitment to social housing modernization, but there are a number of issues that need to be urgently addressed in order to ensure the sustainability of the social housing portfolio, particularly non-profit and co-operative housing providers funded under Part VII of the <i>Housing Services Act</i> (HSA). The uncertainty regarding the Service Manager’s</p> | <p>Housing Services Act</p> <ul style="list-style-type: none"> OMSSA and Service Managers support the proposed change to eliminate Ministerial Consent for transfer of social housing property and for changes to Local Housing Corporations in favour of Service Manager Consent. Legislative changes should ensure that there is no ambiguity with respect to the change |

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| <ul style="list-style-type: none"> Legislative changes to provide Service Manager’s greater flexibility to use their building assets (i.e. encourage mixed-income buildings). Prescribe Service Manager decisions that a housing provider can appeal and set out requirements for the appeal process | <p>provincial mortgage pool and extension of CMHC premium waivers).</p> <ul style="list-style-type: none"> Permitting market rent units in public housing is a significant program enhancement. Further reductions/delegations of Ministerial Consent requirements support efficient local program administration. <p>Risks:</p> <ul style="list-style-type: none"> There is no new funding commitment to invest in the repair and regeneration of existing housing supply or to support new construction Accreditation should be beneficial as a long term system enhancement. However, Service Managers also identified the need for the authority to set local standards for building maintenance and long term asset planning to mitigate financial risks related to housing provider building operations. Service Managers also requested that the HSA provide for lesser enforcement provisions that could apply to local standards and other HSA breaches that don’t warrant the severity of remedies currently provided in the HSA. There are a number of areas that should be considered as part of the social housing modernization exercise, including: | <p>long-term funding obligations is a barrier for Service Managers who are able to provide capital repair funding to housing providers with depleted reserves. There is an urgent need to establish a technical working group to assess the implications of first mortgage discharge on the HSA Part VII funding formula and capital repair financing needs and to develop options for a sustainable funding framework.</p> <p>Although accreditation standards can be very valuable, Service Managers asked for greater flexibility with respect to establishing local standards. To be truly effective, an accreditation system should be supported with training and related resources. The ONPHA mentorship program and CHF supports should be provincially funded to support housing provider capacity.</p> <p>Service Managers encourage the province to expand the social housing mortgage pool to include capital repair and redevelopment financing. In particular, the housing sector as a whole would benefit from expansion of the social housing mortgage pool.</p> <p>Service Managers are the primary funders of the housing programs. As modernization initiatives will have cost implications, prior to stakeholder consultation, the Province should plan to work directly with Service Managers to assess</p> | <p>in consent provisions – particularly as they relate to legacy requirements under the <i>Social Housing Reform Act</i> and documents registered on title under that Act.</p> <p>Housing Services Act – O. Reg. 367/11</p> <ul style="list-style-type: none"> No Service Manager decisions should be prescribed in the regulation, and the provision permitting a housing provider to request a review of a Service Manager decision (HSA, s. 157) should be removed. More specifically, reviews should not be required in relation to Service Manager decisions pertaining to: Remedies – The exercise of a remedy under section 85 of the HSA. These decisions are subject to strict, prescriptive enforcement provisions (HSA, s. 82-99) that give the housing provider ample opportunity to work with the Service Manager to rectify the concerns/triggering events and to provide comment with respect to proposed remedies. Decisions of the Service Manager in this regard are also subject to judicial review. Section 100 of the HSA requires that a review of these enforcement provisions be completed by January 1, 2017. Implementing a new review provision prior to the completion of this review would be premature. The review should consider |

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| | <ul style="list-style-type: none"> • A long-term sustainability strategy for housing providers subject to Part VII of the HSA, specifically addressing the funding formula and capital repair financing needs. • Creation of a technical working group to explore opportunities to facilitate mergers/amalgamation and shared service arrangements for housing providers. • Expansion of HSA s.167 transfer exemptions to include amalgamation of portfolios, the transfer of housing projects from Service Manager to local housing corporation or social housing provider or vice versa. (e.g. exemptions from land transfer taxes). • A commitment to work with the federal government to develop strategies to preserve the not-for-profit status and HST “qualifying non-profit” status of housing providers who continue to subsidize rents after their operating agreements expire. • Service Managers’ decisions should not be subject to an HSA based review process. In many service areas, these decisions are made by Council and subject to judicial review by the courts. Additionally, housing providers already have the right to engage | <p>implication before any change commitments are announced.</p> | <p>how successfully these provisions balance the powers of the Service Manager to effectively administer the housing programs in its service area with the authority of the housing provider to manage its properties, and whether an additional review provision is warranted or would only frustrate this process.</p> <p>Funding – Payment of subsidy is entirely prescribed by legislation and subject to judicial review. The Service Manager has no legislated obligation to increase the funding amount, and no means to reduce funding except under the enforcement provisions of the HSA (see above point).</p> <p>Service Manager Consent – As the Service Manager is responsible for any default of the housing provider’s obligations, it is unreasonable to permit an outside body to determine that a Service Manager must consent to actions that would place it at risk.</p> <p>Housing Services Act – O. Reg. 367/11</p> <ul style="list-style-type: none"> • OMSSA and Service Managers support the changes to public housing market rent restrictions and look forward to removal of the public housing requirements from Schedule 5. <p>Housing Services Act – O. Reg. 367/11</p> |

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| | <p>elected officials, make deputations to Councils and appeal to an ombudsman.</p> <ul style="list-style-type: none"> • Service manager decisions related to housing providers can only include: <ul style="list-style-type: none"> • The exercise of a remedy under section 85 of the HSA • Service manager consent under sections 161, 162, 166 (and LHC changes under s. 32,33,34) • The provision of subsidy under s. 78 of the HSA and subject to provisions of O. Reg. 369/11. • Changes to targets under section 77(5) of the HSA • Imposing an unelected, non-judicial body to review such decisions usurps the authority of the municipality/DSSABs under the Municipal Act. • Prescribed decisions for review under section 157 of the HSA are subject to the Service Manager’s system for dealing with reviews as authorized under section 153. The current prescribed requirements for this system (in the Act and under O. Reg., s. 138) do not seem to support the creation of an outside review body. | | <ul style="list-style-type: none"> • OMSSA and Service Managers also support a change to Schedule 5 to remove the requirement that “only units in non-profit housing projects may be provided.” This will provide the broadest range of organizations that can own a Program 6 housing project, and provide Service Mangers greater flexibility in managing their social housing portfolio. <p>Housing Services Act – O. Reg. 367/11</p> <ul style="list-style-type: none"> • OMSSA and Service Managers support the proposed change to permit them to set local standards governing "occupancy agreements" in co-operative housing, but should also have the authority to set local standards for building maintenance and long term asset planning, in order to mitigate financial risks related to housing provider building operations. • OMSSA and Service Managers would like to see complimentary provisions that would permit enforcement of local standards without recourse to the more severe remedies currently provided under the HSA <p>Housing Services Act – O/Reg. 3687/11</p> <p>OMSSA and Service Managers support housekeeping changes to delete housing projects that have been removed from the social housing portfolio and make minor corrections.</p> |

LTAHS Theme: Equitable, Portable System of Financial Assistance

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| <p>Portable Housing Benefit Framework</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> Consulting stakeholders on the creation of a provincially-defined framework for an income-based portable housing benefit. Financial assistance would be separated from the unit or building and would provide more freedom for people to choose where they live. | <p>Opportunities:</p> <ul style="list-style-type: none"> Portable housing benefits, particularly if provincially funded, could provide more timely access to housing assistance for subsidized housing applicants and would ideally replace the HSA special priority requirements. <p>Risks:</p> <ul style="list-style-type: none"> If the portable housing benefit framework is to replace RGI, extensive work is required to assess the cost implications for Service Managers and the viability implications for housing providers. Implications for Service Level Standards should also be considered. A long-term transition plan will also be required including the opportunity to address service level standards through new initiatives. To be truly portable, the benefit should be income tax based and provincially funded. There is a risk that Service Managers could be required to fund benefits for households who move to other jurisdictions or to absorb households moving in from other communities. The Ministry of Finance (MOF) housing allowance infrastructure is scheduled to end in 2020, limiting Service Managers’ ability to continue to use existing housing allowance | <p>OMSSA and Service Managers support the creation of a portable housing benefit system. However, in order to be truly portable, the benefit should be provincially funded.</p> <p>This system transformation will have significant impacts for Service Managers with respect to both funding, program administration and planning. The province should first work directly with OMSSA and Service Managers and funding ministries to develop a framework for stakeholder consultation. A transition plan will be needed to ensure stability for housing providers as Rent Geared to Income (RGI) subsidies become portable benefits.</p> <p>While a new benefit framework will be valuable, a transition plan is needed to address the system capacity that will be lost as federal funding is withdrawn. A specific exit strategy is needed for the Strong Communities Rent Supplement Program.</p> <p>The Province needs to work with the federal government to develop strategies to preserve the not-for-profit status and HST “qualifying non-profit” status of providers post operating agreements, and after the introduction of a portable housing benefit.</p> | |

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| | <p>programs as an affordability tool. The program should be sustained.</p> <ul style="list-style-type: none"> • Service Managers have asked that the Province engage the Canada Revenue Agency (CRA) and the MOF to develop a long-term sustainable automated income verification program for rent-gear-to-income (RGI) and other Service Manager rent subsidy programs. Although the portable benefit may include this as a longer term resource, there is short term need to enhance other forms of Service Manager rent subsidy. • If the Strong Communities funding is not going to be extended, Service Managers need immediate program flexibility to develop exit strategies (e.g. ability to carry funds forward to future years, perhaps through contribution of under-spending to a fund to offset future year costs.) A specific strategy is needed to phase out the MSCC and Ministry of Health and Long Term Care supportive housing streams. • Loss of RGI subsidy in favour of portable housing benefits could impact the housing providers' non-profit status for income tax purposes and qualifying non-profit status for HST rebates. • Portable benefits of fixed amounts may be insufficient for people on Ontario Works (OW) and Ontario Disability Support Program (ODSP) without co-ordination across programs. | <p>A portable benefit needs to work in harmony with OW/ODSP shelter benefits to ensure the combination of both will:</p> <ul style="list-style-type: none"> • consistently provide for the payment of full market rent to social housing providers • not require OW/ODSP tenants to use basic needs amounts for shelter costs. | |

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| <p>Simplified Rent-Geared-to-Income (RGI) Calculations</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> • Harmonize definition of income by working with Service Managers, housing providers and tenant groups. • Move to annual income review, but still permit a request to decrease RGI for a loss of income. • Income increases must be reported. • Exempting scholarships and bursaries for post-secondary study from income for the purposes of calculating a household's Geared-to-Income rent • Modernizing rules about imputed income for the purpose of calculating income | <p>Opportunities:</p> <ul style="list-style-type: none"> • An annual review process should be less administratively onerous. <p>Risks:</p> <ul style="list-style-type: none"> • The RGI changes requested by Service Managers have not been identified to be addressed in the near term. The short term changes identified in the LTAHS are modest, but the impact of the student income changes will result in an increased subsidy costs for Service Managers. • Harmonizing the definition of income could mean shifting to line 236 of the Income Tax Return (to be consistent with childcare fee assistance programs). This has the potential to significantly increase RGI costs by exempting more income, such as RRSP contributions, child/spousal support payments, and child care costs. • RGI costs could further increase if RGI is permitted to increase only once per year but decrease provisions are maintained. • Although not likely a large impact in most areas, increased student income exemptions increase RGI subsidy costs. • It's difficult to assess imputed income modernization without details of the changes proposed | <p>Service Managers fund the RGI system and in principle, support simplification. Any changes though, will have cost implications and as such should be developed in consultation with OMSSA and Service Managers as a precursor to broader consultations.</p> | <p>Housing Services Act – O. Reg. 298/01</p> <ul style="list-style-type: none"> • Scholarships, bursaries and grants that are intended for educational costs should be exempted from RGI even if not received through Ministry of Training, Colleges and Universities. Consideration should be given to limiting the exemptions to under-graduate programs. Where grants/awards provided for education also include a specified amount for a living allowance (e.g. Second Career amounts and OSAP grants), the amount specified for the living allowance should be subject to RGI. <p>Housing Services Act – O. Reg. 298/01</p> <ul style="list-style-type: none"> • The current imputed rate of return provisions in the HSA do not work. (The rate has been 0% since 2012.) Service Managers should be engaged in the development of any changes to: <ul style="list-style-type: none"> ○ better reflect a reduction in RGI subsidy for tenants with large assets ○ allow for exemptions on smaller assets amount, especially where Service Managers have local asset limits. |

LTAHS Theme: People Centered, Efficient Housing Programs

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| <p>Modernized Social Housing Programs</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> • Allow more flexibility with Service Level Standards. • Proposed legislative amendments allow Service Managers to use other forms of Service Manager-funded housing assistance to contribute to their Service Level Standards. • Proposed legislative amendments allow Service Managers to remove households who have accepted an alternative form of housing assistance from social housing waiting list. | <p>Opportunities:</p> <ul style="list-style-type: none"> • Greater flexibility with Service Level Standards should support local innovation <p>Risks:</p> <ul style="list-style-type: none"> • The Province has not yet defined the process to assess whether locally designed and funded rent subsidies and capital housing investments will qualify for inclusion in Service Level Standards. • Service Level Standards reflect historic levels of RGI units. In the long term, consideration should be given to modernizing the Provincial approach to measuring Service Manager engagement in their local housing systems. Ideally, performance measurement should be tied to the Service Manager’s progress under the Housing and Homelessness plan. • There are no proposed changes to wait list eligibility rules to support the removal from the wait list of households accepting alternate housing assistance. For example, will a refusal of an offer of alternate housing assistance count as an offer for waiting list purposes? | <p>OMSSA and Service Managers support the provincial commitment to social housing modernization.</p> <p>Service Manager performance measurement should be tied to progress under its Housing and Homelessness Plan, not historic Service Level Standards.</p> | <p>Housing Services Act</p> <ul style="list-style-type: none"> • Service Manager-funded housing assistance should be broadly defined to include all forms of Service-Manager administered assistance; including programs for which provincial or federal funding may also be received (e.g. rent supplements or housing allowances provided under the Investments in Affordable Housing program). This would enable Service Managers to better manage at a system level. Operational and capital investments that create long term affordable housing should also be considered as part of the Service Level Standard (e.g., Service Manager purchase of a condominium unit, that can be offered at an affordable rent, should qualify under the Service Level Standard.) <p>Housing Services Act</p> <ul style="list-style-type: none"> • Service Managers should be allowed to remove or re-prioritize applicants receiving RGI or alternate forms of assistance within or outside their service area. The provision should work in harmony with other waiting list provisions (e.g. eligibility requirements, offers, internal transfers) to allow the Service Manager greater flexibility in |

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| | | | <p>determining how best to manage its waiting list in accordance with the needs of its community.</p> <p>Housing Services Act – O/Reg. 367/11</p> <ul style="list-style-type: none"> OMSSA and Service Managers support housekeeping changes to revoke GTA equalization payment provisions and update cross-references to other legislation. |
| <p>Coordinated Access System</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> Working with stakeholders to create a provincial framework for housing access that encourages coordination across systems (health, social and community services, children and youth). Improved client referrals to housing and support. | <p>Opportunities:</p> <ul style="list-style-type: none"> Streamlining and coordinating access is the right thing to do. This work should be supported and integrated across the government’s broader initiative on integrating human and related services. Simplifying processes to enhance the ability and opportunities for people in need of support and services to improve their lives is needed. Over time, it is expected that a coordinated, integrated strategy and system will yield improved outcomes. <p>Risks:</p> <ul style="list-style-type: none"> The existing Service Manager/Provincial systems are not integrated. The provision of benefits is fragmented between multiple ministries, Service Managers, funding | <p>OMSSA and Service Managers need greater clarity on the scope of the provincial vision for a coordinated access system to assess the implications for subsidized housing waiting lists and the social and affordable housing portfolios.</p> <p>Greater collaboration is needed between institutions/organizations that are discharging their clients and Service Managers/housing sector who are housing people following discharge. The focus should be on thorough case planning prior to discharge and ongoing supports to ensure sustained tenancies following discharge, especially regarding:</p> <ul style="list-style-type: none"> MCYS for the youth population that end their care under CAS MJUS for people who are done their incarceration MOHLTC/LHIN for services in areas of mental health, health, psycho-geriatric, etc. | <ul style="list-style-type: none"> OMSSA and Service Managers should be engaged in policy discussions and development on how best to design and implement a coordinate access system that is supported by a strategy of integrated system and supports across government. |

LTAHS Theme: People Centered, Efficient Housing Programs

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| | <p>streams, organizations, and support agencies.</p> <ul style="list-style-type: none"> Limited details on this proposal leave significant questions, such as: <ul style="list-style-type: none"> Who is responsible for the coordinated system? How will the coordinated system work? What is the relationship to Service Manager administered subsidized housing waiting lists? Will this result in broader responsibilities for Service Managers? Who will be accountable for achieving a coordinated system? The LTAHS update does not address the need to amend the HSA and Regulation 367/11 to exclude modified units, without dedicated support services, from the definition of special needs housing and exempt special needs from the HSA application and tenant selection requirements. | <p>An effective coordinated access system is impossible without first addressing the multiple concerns identified by Service Managers in relation to waiting list provisions under the HSA.</p> <ul style="list-style-type: none"> Amendments to HSA waiting list requirements to support its use more broadly than for RGI (e.g. eligibility, offers, internal transfers, selection of tenants) and provide the Service Manager greater flexibility in managing the waiting list. Amendments to exclude modified units without dedicated support services from the definition of special needs housing and exempt special needs units from the HSA application, tenant selection and review process requirements. | |
| <p>Enhancing Housing Options for Survivors of Domestic Violence</p> <ul style="list-style-type: none"> Develop a provincially defined framework for an income based portable housing benefit, targeted to survivors of domestic abuse | <p>Opportunities:</p> <ul style="list-style-type: none"> If established as a permanent, provincially funded initiative, a housing benefit for survivors of domestic violence could better serve this population while reducing waiting list pressures and increasing the number of chronological applicants housed. | <p>Service Managers requested a portable housing benefit as an alternative to Special Priority. The pilot program is framed as a transitional benefit. It is important to understand the outcomes of the pilot as a basis for which developing an effective strategy and approach should be formed.</p> | |

LTaHS Theme: People Centered, Efficient Housing Programs

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| <ul style="list-style-type: none"> Pilot program to be initiated in 3 Service Manager areas, selected through an expression of interest process | <p>Risks:</p> <ul style="list-style-type: none"> There is no long-term funding commitment and no change to Special Priority requirements at this time. | <p>OMSSA and Service Managers encourage the Province to develop and invest in a comprehensive strategy that provides supports and includes a portable housing benefit that will provide a viable alternative to special priority for RGI housing and most importantly, appropriately address the complications and needs associated with victims of domestic violence.</p> | |
| <p>Transformation of the Supportive Housing System</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> Develop a supportive housing policy framework, best practices guide, and performance measures. | <p>Opportunities:</p> <ul style="list-style-type: none"> A system level response to supportive housing programs should support better outcomes. Improved access to services, availability of supportive housing units and alignment of supportive housing stock. <p>Risks:</p> <ul style="list-style-type: none"> It is confusing that Service Managers are not included in the list of collaboration partners. What’s the vision for the Service Manager role in supportive housing, especially in relation to the access system objectives elsewhere in the strategy? Potential changes to the supportive housing framework could be costly to administer if supportive housing is too broadly defined. For example, supportive housing and “care occupancies” are subject to more extensive | <p>OMSSA and Service Managers should be engaged in the transformation consultations.</p> <p>As a first step, the HSA and the regulations should be reviewed and updated to separate the requirements for modified units without supports from those for units with supports. Supportive units should not be subject to HSA wait list and review processes, as this gives Service Managers legal responsibility for a supportive housing selection process that they do not control.</p> <p>There should be a clear distinction between supportive housing and independent living with supports. Service Managers’ roles need to be clearly defined in relation to supporting the Supportive Housing system.</p> | |

LTAHS Theme: People Centered, Efficient Housing Programs

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| | and costly fire code provisions than are units intended for independent living. | | |

LTAHS Theme: Ending Homelessness

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| <p>Enumeration of homeless population</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> Proposed legislative amendment requiring Service Managers to conduct local enumeration of homeless population. Menu of options of what people can choose to complete enumeration | <p>Opportunities:</p> <ul style="list-style-type: none"> Province wide data collection and sharing should support evidence based policy decisions and program investments. <p>Risks:</p> <ul style="list-style-type: none"> No indication that the enumeration process will be funded. May duplicate HPS requirements in communities where the Service Manager is not the HPS community entity. | <p>Additional Provincial funding should be provided to support local enumeration processes so that it doesn't result in a reduction in Community Homelessness Prevention Initiative (CHPI) funded programs.</p> | <p>Housing Services Act</p> <p>Provision should allow the Service Manager flexibility in determining the type of enumeration, in line with their housing and homelessness plans. Alignment with the following is also required:</p> <ul style="list-style-type: none"> Reporting requirements of the CHPI The federal Homelessness Partnering Strategy goals, funding and program requirements. |

LTAHS Theme: Ending Homelessness

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| <p>Enhance homelessness direction in Ontario Housing Policy Statement</p> <ul style="list-style-type: none"> • Proposed updates to the Ontario Housing Policy Statement to: <ul style="list-style-type: none"> ○ Align with LTAHS vision, goals and direction ○ Be consistent with the provincial goal to end chronic homelessness and the four priority areas for ending homelessness ○ Promote collaboration between the LHINs and Service Managers. | <p>Opportunities:</p> <ul style="list-style-type: none"> • Based on the cornerstone provincial policies of poverty reduction, reducing homelessness and integration of policies, programs, planning and funding provide an important opportunity to improve local planning and program delivery. <p>Risks:</p> <ul style="list-style-type: none"> • The Policy Statement establishes the compliance criteria for Service Manager Housing Plans. • Any expansion in the mandate and responsibilities for Service Managers must be fully funded by the provincial government. Increased Plan requirements that are not accompanied by provincial funding could have a tax levy impact. | | <p>Ontario Housing Policy Statement</p> <ul style="list-style-type: none"> • Under section 5 of the HSA, the Ontario Housing Policy Statement is intended to guide Service Managers in the preparation of their housing and homelessness plans. The policy statement should not impose greater responsibilities without a long-term commitment for responsive and sustained funding. • The statement should recognize that although the four provincial priority areas may be of equal concern at a provincial level, there may be variation at the Service Manager level. Some service areas may have identified a far greater or lesser need in one or more categories than the provincial average. The policy statement should recognize the need to balance the Service Manager’s locally identified needs and priorities with those of provincial interest. • The statement should focus on how the Province can support the Service Manager/LHIN collaboration, not just promote it. |

LTAHS Theme: Ending Homelessness

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| <p>Developing a Provincial Framework of Indicators</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> • Indicators will be created to measure: <ul style="list-style-type: none"> ○ Chronic homelessness ○ Youth homelessness ○ Indigenous people who are homeless ○ Homelessness following transitions from provincially-funded institutions and service systems | <p>Opportunities:</p> <ul style="list-style-type: none"> • Indicators, if developed at the Provincial level, would introduce standard measures across the province. • These indicators can align with Service Managers’ Housing and Homelessness Plans. <p>Risks:</p> <ul style="list-style-type: none"> • The measuring and monitoring requirements may be established as a Service Manager responsibility, but there is no clarity on system costs and data ownership issues. There is a particular lack of clarity with transitions from provincially funded institutions and systems. • Immediate challenges associated with indicators for transitioning from provincially funded institutions and service systems include: <ul style="list-style-type: none"> ○ Service Manager access to the data to measure and influence these indicators. ○ Service Managers do not control discharge processes. • It is unclear who is responsible for the development of these indicators. • Concern that these indicators could be used inappropriately to give mandated priority to these groups under local housing and homelessness plans, although these may not align with local priorities. | <p>Indicators should be developed in consultation with OMSSA and Service Managers and stakeholders.</p> <p>Additional provincial funding is required to support the cost of collecting and reporting more data. Without additional resources, there may be unforeseen pressures that compromise existing program data.</p> <p>Pre-discharge planning from provincially-funded institutions is a provincial responsibility, and should be the focus of successful outcomes for these priority groups. Service Managers can assist in mitigating homelessness by providing information and helping to identify gaps in the system, so that the Province can enhance its services to assist these groups.</p> <ul style="list-style-type: none"> • Measurement should focus on the effectiveness of the provincial systems in meeting the needs of its clients post-discharge, not the Service Manager’s ability to fill these gaps. • Consultation with stakeholders should focus on the identification of indicators for the Province, so that it can plan for system enhancements. | |

LTAHS Theme: Ending Homelessness

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| <p>Supportive Housing Funding</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> A commitment for \$100 million in operating funding for housing allowances and support services to support locally-developed solutions that align with the Supportive Housing Policy Framework. | <p>Opportunities:</p> <p>Funding for supportive housing will potentially address gaps for some Service Managers; however details of funding distribution by jurisdictions is yet to be released.</p> | <p>New supply initiatives targeted to supportive housing should be developed through a collaborative process that includes the support service funding ministries, OMSSA and Service Managers.</p> <p>Some Service Managers have already engaged their communities in developing Supportive Housing Strategies. Service Managers should play a role in planning, aligned with local plans and development of approaches.</p> | |
| <p>Community Homelessness Prevention Initiative Funding (CHPI)</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> Increase funding by \$45 million over 3 years. | <p>Risks:</p> <ul style="list-style-type: none"> 2016 CHPI funding has not increased from 2015 levels. Difficult to maintain existing service levels and plan for expanding system needs with a fixed funding envelop. More reporting requirements. More pressure to address targets to end homelessness, and possibility that the funding increase may be tied to indicator requirements. | <p>CHPI funding increase should match increased Service Manager responsibilities.</p> <p>Service Managers should be permitted to use CHPI funding for capital costs in shelters.</p> | |
| <p>Capacity Building</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> Develop a framework for sharing best practices and research Promote cultural sensitivity across Service Managers and housing providers | | <p>OMSSA and Service Managers are supportive of initiatives to build capacity in the homelessness sector.</p> <p>The province should consider developing a research portal, similar to OMSSA's Housing and Homelessness Resource Centre, to share</p> | |

LTAHS Theme: Ending Homelessness

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| <ul style="list-style-type: none"> Host a homelessness summit | | information on best practices and lessons learned. | |

LTAHS Theme: Achieving an Evidence-Informed System

| Proposed Initiative | Opportunities and Risks for Service Managers | OMSSA/SMHN Recommendations | Recommendations Specific to Proposed Regulatory Amendments |
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| <p>Innovation, Evidence and Capacity Building Fund</p> <p><u>Description:</u></p> <ul style="list-style-type: none"> • A commitment of \$2.5 over 3 years to support research, evaluation, and capacity building with a focus on: <ul style="list-style-type: none"> ○ sustainable housing supply ○ fair system of housing assistance ○ coordinated and accessible supports ○ ending homelessness ○ indigenous housing strategy ○ effective use of evidence and best practices | <p>Risks</p> <ul style="list-style-type: none"> • Service Managers currently compile reports for the province, including Service Manager Annual Information Return (SMAIR) and Annual Information Return (AIR) – these reporting requirements are not compatible with HSA Part VII. As a result resources are dedicated to manual statistics data collection and analysis. Reporting requirements should be reviewed and realigned. • No details are available on how this funding relates to the new provincial homelessness indicators and other data collection requirements. • During comment period for LTAHS review, additional focus on creating a data strategy was recommended. However, this initiative is missing efforts to have accurate and reliable data and information generally. For example, the Province could better support the delivery of overall housing stock information, particularly market based housing, in partnership with CMHC. This would support ongoing monitoring of housing supply and evidence-based decision making that would result from this research. Data which is being provided to the City of Toronto, where available, should be available to other municipalities/DSSABs. | <p>In consultation with OMSSA and Service Managers, review all existing reporting requirements and develop a new, streamlined process that aligns with HSA program requirements, fulfills federal reporting obligations and supports evidence based decision making.</p> <p>A technical working group should be established to develop a research, data and information sharing strategy for the sector that supports Service Managers, housing providers and community partners in the collection of data, use and reporting of data.</p> <p>Shift Service Manager reporting focus to outcomes of 10-year housing and homelessness plans.</p> | |

LTAHS Theme: Developing an Indigenous Housing Strategy

| Proposed Initiative | Opportunities and Risks for Service Managers | Proposed SMHN Feed-back to MMAH | Recommendations Specific to Proposed Regulatory Amendments |
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| <p>Developing an Indigenous Housing Strategy <u>Description:</u></p> <ul style="list-style-type: none"> Committed to an ongoing consultation process with First Nation, Metis, and Inuit organizations and communities. Indigenous peoples living off-reserve are over-represented among Ontario’s homeless population. | <p>Opportunities:</p> <ul style="list-style-type: none"> Increased collaboration, enhanced partnerships and coordinated planning provide a critical opportunity to address and remedy significant housing and service issues. <p>Risks:</p> <ul style="list-style-type: none"> How will this provincial deliverable translate to a Service Manager responsibility? Will Service Managers have specific obligations/targets as a result of the Strategy? | <p>Clarify Service Manager role in implementation of the strategy.</p> | |