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**Parkdale
Community Legal Services Inc.**

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Community Development and Recreation Committee
City of Toronto

Re: 2013 year end report on Housing Stabilization Fund

The Housing Stabilization Fund is a critical support in preventing homelessness and addressing some of the emergency housing needs of residents. Though this report documents some of the improvements made to the fund in 2013, some critical issues remain unaddressed and some key information is missing.

Budget

The recommended 2015 budget for the fund is inadequate to meet the emergency housing needs of those on OW and ODSP in Toronto. The proposed budget is shrinking – while at the same time social assistance rates continue to slip in real dollars.

The report describes steps to improve communication about the fund's existence and a centralized application process to improve access for ODSP recipients. Some steps were taken to expand eligibility mid-2013 and this led to an increase in applications. One could reasonably expect a rise in applications as further proposed improvements take place. With a shrinking budget, how will these increased requests be met? Will people be denied in the fall of each year when the money is almost gone?

The fund needs to expand so that it actually meets the needs of those who would have accessed the Community Start Up benefit. Those needs remain, and while social assistance rates remain unliveable and affordable housing inaccessible to most, this fund is critical. Shrinking the budget based on the first full year of a hastily assembled response to provincial cuts is the wrong way to go. The City needs to press the Province to reinstate the Community Start Up rather than shrinking the HSF and trying to manage the loss by denying applications.

Eligibility

Though we saw some positive movement on eligibility midway through last year, this winter we have seen a clamp down. This is not acknowledged in the report. It would be useful to see a breakdown of the rate of successful applications month by month rather than a yearly total. This would better show effects of policy changes.

➤ *Rental arrears*

We're concerned about the way rental arrears are treated. We've had cases where applicants with significant arrears were denied because there was no notice of termination. The reality is, when tenants are behind on their rent they are at risk of

eviction. An application process which relies on clients providing eviction notices ensures they remain precariously housed.

➤ *Furniture*

Even though half of all eligible applications were for furniture, we're seeing more denials and more rigid documentation requirements, particularly around bed bug infestations. Frequently landlords refuse to provide written proof of sprayings to tenants. Why should a person remain without a bed due to the lack of cooperation by a landlord?

It is reported that 60% of denials were due to persons being assessed as having a 'stable' home or deemed not to be moving to more affordable housing. A home without furniture can by no measure be deemed 'stable'. An apartment with no beds, table, desk, or pots and pans to cook with, cannot reasonably be called a home in any basic social definition of the term. A home is more than simply 4 walls. These items need to be provided for in the fund.

➤ *Moving expenses*

Last year we saw people receive HSF for expenses related to moving to more sustainable housing (for example, from a rooming house to an apartment). This year we're being told that moving expenses will only be considered where a client is moving from the street or shelter into housing. There are health and safety concerns that lead to a person needing to move laterally – it may not fit the definition of a more affordable place, but affordability cannot be the only criteria. When you can't afford to move, it is difficult to assert your housing rights – leaving too much room for landlords to neglect their responsibilities in terms of the conditions of a rental.

Appeals

It is also clear from the report that the appeal process needs to be improved. Only 1% of applications were appealed. People need to be informed systematically about their right to appeal and provided information about how to do that, including where to find assistance. The overturn rate of 53% also signals a problem – such a high number suggests that many people were needlessly denied in the first place. People need to be granted needed funds at first application wherever possible, not through an appeal process that few pursue.

Missing Info

The report leaves a number of questions unanswered. How many ODSP recipients received HSF vs those on OW? How are single parents faring with HSF – there is no data provided. ODSP recipients were approx ¼ of CSUMB applications and single parents were 24%. In addition, the reported data regarding applications, denials and appeals doesn't capture the people who were de facto denied before applying – told by their caseworker they don't qualify and shouldn't bother making a request at the initial inquiry stage. In terms of timeliness, there is a suggestion in the report that responses should be

provided within 2 days. There is no documentation of how long responses are taking currently. In our experience people are sometimes waiting weeks, not days. Given the critical nature of this fund in preventing homelessness, this information is essential and should help guide further improvements to the fund.

Yours truly,

PARKDALE COMMUNITY LEGAL SERVICES INC.

per:

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