

Update on the Review of the Centralized Waiting List for Social Housing

Date:	June 11, 2014
To:	Community Development and Recreation Committee
From:	General Manager, Shelter, Support and Housing Administration
Wards:	All
Reference Number:	

SUMMARY

In April 2013, Council approved recommendations from the first phase of a review of the social housing waiting list system, including future directions for improving access to housing services in Toronto.

Over the past year, Shelter, Support and Housing Administration (SSHA) staff undertook the second phase of the review, including the following work completed in collaboration with City staff, Toronto Community Housing (TCH) and community partners:

- Community consultations with applicants, service providers and the public.
- A pilot choice based system, called "My Choice Rental," to improve access to rent-geared-to-income (RGI) housing.
- Updates and changes to local rules for social housing, including occupancy standards, mandates and the method for ranking applications.

The recommendations in this report are intended to ensure that households in need are able to access available housing services in an efficient, transparent and equitable manner.

In addition to recommendations for the centralized waiting list for RGI assistance, this report provides a model for integrating access to a range of housing and related services in Toronto. This model will be implemented in coordination with related cross-divisional service initiatives and with the key actions identified in the *2014-2019 Housing Stability Service Planning Framework* approved by Council in December 2013.

RECOMMENDATIONS

The General Manager of Shelter, Support and Housing Administration recommends that City Council:

1. authorize the General Manager, Shelter, Support and Housing Administration to implement a choice based system for the selection of households for vacant rent-geared-to-income (RGI) units, such that the highest priority household will be selected for a vacant RGI unit from among the applicant households that express interest within a specified time period, after information about the vacant RGI unit has been made available to all eligible households;
2. authorize the General Manager, Shelter, Support and Housing Administration to revise Local Occupancy Standards for RGI assistance as described in the attached Appendix A;
3. authorize the General Manager, Shelter, Support and Housing Administration to revise the social housing provider mandate policy as described in the attached Appendix B;
4. authorize the Deputy City Manager, Cluster A to take steps to integrate the administration of access to RGI housing with administration of other housing benefits and supports, and other income-tested human services by:
 - a. Developing an integrated service delivery model for intake and eligibility determination for RGI assistance, housing allowances and other housing and related City-administered human services;
 - b. transforming the centralized waiting list system into a multi-service housing registry as a component of the integrated human services delivery model;
 - c. Working with Toronto Community Housing to develop a transition plan for the integrated service delivery model that acknowledges and protects the interests of Toronto Community Housing staff, service partners, applicants and residents; and
5. request the Province to replace the Special Priority Housing Category with long-term funding for a specialized program to provide rent supplements and appropriate supports that better meet the housing needs of victims of domestic abuse.

Financial Impact

The recommendations in this report have no financial impact beyond what has been included in the 2014 Approved Operating Budget for SSHA.

The City contracts with Toronto Community Housing (TCH) to administer the waiting list system through a subsidiary corporation, Housing Connections, with a budget of

\$4.35 million per year. Funding for this service is included in the subsidy the City pays to TCH.

The funding required to support the review of the centralized waiting list system is included in the 2014 Operating Budget for SSHA. There are no additional costs resulting from the recommendations to integrate administrative access and related services.

The Deputy City Manager and Chief Financial Officer has reviewed this report and agrees with the Financial Impact statement.

Equity Impact

The review of the centralized waiting list system and the recommendations that follow from it seek to improve services provided to people applying for social housing, which includes equity seeking groups such as women, seniors, people with disabilities, individuals with mental health issues, those who are homeless and other vulnerable groups in the City of Toronto.

DECISION HISTORY

The *Housing Opportunities Toronto Affordable Housing Action Plan 2010-2020* was adopted by Council at its meeting of August 5 and 6, 2009. The HOT plan called for a comprehensive review of the social housing access system to "explore how to improve service to clients, more effectively match applicants with units, and provide fair and efficient access to housing for the most vulnerable."

<http://www.toronto.ca/legdocs/mmis/2009/cc/decisions/2009-08-05-cc38-dd.htm>

On April 3 and 4, 2013, Council approved the report "Review of the Centralized Waiting List for Social Housing: Framework and Proposed Directions" and directed the General Manager of Shelter, Support and Housing Administration to report back to Council on findings and final recommendations regarding a choice based system, local rules, the client service experience and service integration.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2013.CD19.2>

The *2014-2019 Housing Stability Service Planning Framework* was adopted by Council at its meeting of December 16, 17 and 18, 2013. One of the key actions described in the framework is to "Create a proactive, coordinated access system for social and affordable housing, consistent with Council direction, by implementing changes to City policies, modernizing system administration and empowering applicants with better information and more choices."

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2013.CD25.10>

Eligibility Rules

City Council on November 26-28, 2002, approved rules for maintaining eligibility for the centralized waiting list by the adoption, as amended, of Community Services Committee

Report 10 (9).

<http://www.toronto.ca/legdocs/2002/agendas/council/cc021126/cms10rpt/cl007.pdf>

Local Access Priorities

City Council on June 18-20, 2002, approved Local Access Priorities by the adoption, as amended, of Community Services Committee Report 6(10).

<http://www.toronto.ca/legdocs/2002/agendas/council/cc020618/cms6rpt/cl015.pdf>

Local Occupancy Standards

City Council on April 16-18, 2002, approved Local Occupancy Standards by the adoption, as amended, of Community Services Committee Report 3(10).

<http://www.toronto.ca/legdocs/2002/agendas/council/cc020416/cms3rpt/cl009.pdf>

The Local Occupancy Standards were revised by Council by the adoption, as amended, of Community Services Committee Report 10(8) at its meeting on November 26-28, 2002. <http://www.toronto.ca/legdocs/2002/agendas/council/cc021126/cms10rpt/cl008.pdf>

City Council on June 8 and 9, 2010, approved minor amendments to the Local Occupancy Standards, in order to ensure compliance with the Ontario *Human Rights Code, 1990*. <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2010.CD33.6>

Housing Provider Mandates

City Council on November 26-28, 2002, adopted rules for housing provider mandates by the adoption, as amended, of Community Services Committee Report 10 (9).

<http://www.toronto.ca/legdocs/2002/agendas/council/cc021126/cms10rpt/cl009.pdf>

ISSUE BACKGROUND

In April 2013, Council considered the report "Review of the Centralized Waiting List for Social Housing: Framework and Proposed Directions" and approved a series of recommendations, including future directions for improving access to housing services in Toronto.

Over the past year, SSHA staff undertook the second phase of this review – including community consultations, policy development and review of updates to local rules and implementation of a choice based system pilot program – all in collaboration with City staff, Toronto Community Housing and various community partners.

Purpose of the Review

The primary challenge faced by households seeking access to RGI assistance or other housing programs is the fact that, at any given moment, housing need in Toronto far exceeds the resources available to address it. In early 2014, the scale of unmet need was

thrown into stark relief as the social housing waiting list exceeded 90,000 households for the first time.

This review has not set out to solve the larger issues of social and affordable housing supply – although a number of concurrent efforts at the City, including the *Close the Housing Gap* campaign for more provincial and federal support, are seeking progress on that front.

Rather, the intent of this review is to ensure the system for accessing housing services, including the centralized waiting list for social housing, is operationally efficient and compliant with legislation, and, as importantly, functioning in the best interest of households in need. And while we recognize the challenges created by the shortage of affordable housing supply, it is that much more important that the City and its partners make the best possible use of available funding, staff and program resources, assets and partnerships to provide access to housing services.

At a minimum this means ensuring that no household is denied access to service as a result of outdated policies, weak processes or poor customer service. During the review, staff worked with stakeholders and service partners to identify a range of recommendations and changes to improve the functions of the existing system.

It also means making system improvements that will lead to better housing outcomes. Therefore, during the course of the review staff have developed a strategic vision to make the access system more proactive and responsive, especially through better coordination and integration of the intake and assessment and waiting list (or "housing registry") functions.

Summary of Phase II

In the April 2013 report, a number of areas were identified in the access system for further review and analysis. Staff committed to the following deliverables as a part of the second phase of the review:

- Implementation of a choice based system that better matches applicants with vacancies.
- Changes to local rules to better address needs and challenges in the system.
- Improvements to the client service experience and an implementation plan for better use of technology in the application process.
- An implementation plan to achieve better integration of the waiting list with other housing access services.

Staff have now completed the second phase of the review. A number of system changes and policy recommendations have been identified and are described in the "Comments" section of this report.

Critical Success Factors

To guide the work of this review, staff established a series of key principles or "critical success factors" for how the system should perform. These were first introduced in the staff report last year and are as follows:

- **Client-Centred:** The first priority of the access system is to provide the best possible service to as many households as possible.
- **Transparent:** Households should understand the options available to them, how households are selected for units and their status on the waiting list.
- **Easy-to-Access:** Services should be accessible to people with a range of abilities, in neighbourhoods across Toronto, and through a range of service channels.
- **Comprehensive:** A range of different solutions should be offered to meet the housing needs identified by households in the short, medium and long-term.
- **Outcome-Focused:** The system should respond to the needs of households and should provide meaningful support in resolving their housing stability challenges.
- **Integrated:** The full array of services available to meet a household's housing needs should be available through a "no wrong door" approach.
- **Efficient and Cost-Effective:** The system should use available resources effectively to deliver the highest possible quality service.

Public Consultations

Over the past year, SSHA solicited public and stakeholder feedback regarding the access system through a number of different consultation initiatives.

First, SSHA launched a series of consultation and engagement activities as a part of developing the *2014-2019 Housing Stability Service Planning Framework*. During 2013, over 2,000 voices were heard through discussion sessions, online surveys, focus groups, key informant interviews and a public opinion poll. Access to RGI assistance and other housing services was a key theme in these consultations.

Second, SSHA staff held a series of stakeholder sessions to discuss proposed changes to local rules for RGI assistance, with participants including tenants, TCH and other housing provider board members and staff, and various housing sector organizations. The insights provided by these sessions are reflected in the comments regarding local rules.

Third, in February 2014 Housing Connections with SSHA input, contracted an external consultant to administer a survey of households, including applicants on the centralized

waiting list and those recently housed. The survey provides insight into applicants' perceptions and opinions about customer service, access to service, housing needs and outcomes. A total of 600 individuals were surveyed.

The following key messages are clear from these public consultations:

- Households are looking for a range of housing options in addition to RGI assistance, including advice for finding affordable housing, help avoiding eviction and support to meet their rent in their current residence.
- Applicants are generally satisfied with the customer service they receive from Housing Connections staff and the service channels that are provided.
- It is difficult for many households to maintain an application for housing support. Almost half of respondents indicated that it is difficult to maintain an up-to-date application for RGI over the duration of their waiting time.
- Respondents do not believe that the time it takes to receive a housing offer is reasonable, and many find that it is difficult to get information about service options available to them and struggle to maintain an application.
- Above all else, applicants apply for subsidized housing for more affordable rent: 60% of applicants indicated a desire to "pay a more affordable rent" as the primary reason for applying for social housing. 15% indicated a desire to be in a safer neighbourhood.
- The current waiting list system does not provide enough service options to meet the particular circumstances of a household in need. For example, with the exception of the affordability challenges they face, applicants are largely happy with their current housing. In fact, 40% of applicants indicated that if rents were more affordable, they would wish to stay in their current residence. However, in order to receive RGI support, an applicant must move to new housing.
- A range of factors contribute to housing need, some of which cannot be effectively addressed by the housing service system alone. For example, half of applicants indicate that a medical condition contributes to their need for social housing.

COMMENTS

Implementation of a choice based system for social housing

In the April 2013 report, Council approved a recommendation to "explore implementation of a choice based system that more efficiently matches applicants with vacancies and creates opportunities for applicants to have greater input into their housing choices."

Over the past year, SSHA has worked in partnership with TCH and Housing Connections to implement a pilot choice based system for social housing in Toronto, called "My Choice Rental." This pilot program is the first of its kind in Canada. It was publicly launched in February 2014.

Under a choice based system, vacant RGI units are advertised to all eligible applicant households on a regular basis. (During the pilot program, postings are made biweekly.) Information about vacancies, including unit and building features, images and a community profile, is accessible online through the Housing Connections website and as handouts available through various community agencies.

Applicants who are interested in a unit, can indicate their interest (or authorize a support worker to do so on their behalf) through a variety of channels while the posting is active. Support and information about the process is available in-person or online. Only households that indicate interest in a unit will be considered for an offer; and the household ranked the highest based on priority status and wait time is offered the unit first.

The choice based system operates in accordance with legislation and the City's local rules. All applicants are treated fairly. And specific accommodations and outreach efforts are being made by staff to ensure that vulnerable households, including individuals experiencing homelessness, are able to participate and benefit from the program.

The choice based system is the standard model for allocating social housing in other jurisdictions, including most of the United Kingdom and the Netherlands. The evidence demonstrates that if applicants are proactively engaged in the access system the result is greater resident satisfaction, community stability and efficiency in housing provider operations. The choice based system empowers applicants to make more informed decisions and ultimately feel more invested in their housing community over the long term.

Preliminary Results of the Pilot Program

The My Choice Rental pilot program was developed through consultations with stakeholders and through a review of best practices in jurisdictions with experience delivering the model.

Twelve TCH housing developments were selected for participation in the pilot program. Participating developments are located across Toronto and were selected to include a variety of development and unit types and to ensure adequate availability of units during the program. Participating developments are listed in the table below.

TCH developments participating in the pilot program

Development Name	Address	City Ward
Adanac Apartments	140 Adanac Drive	36
Arleta Manor	7 Arleta Avenue	9
Danforth Midland	10 Gordonridge Place	35
Edgeley Village Driftwood	415 Driftwood Avenue	8
Jane Falstaff	40 Falstaff Avenue	12
McClain Park Apartments	10 Glen Everest Road	36
Moss Park	275 Shuter Street	28
Robert J. Smith Apartments	101 Kendleton Drive	1
Teesdale Pharmacy	30 Teesdale Place	35
Thistletown 1	230 Jamestown Crescent	1
Village Apartments	50 Tuxedo Court	38
Wellesley St. E. (200)	200 Wellesley Street East	28

Approximately one thousand applicant households are participating in the pilot program. These households, which include priority applicants, are selected from the top of the waiting lists for participating developments.

Under the conventional waiting list system, housing staff often struggle to find a household that is ready to accept an available RGI unit. As a result, units can remain vacant for an extended period of time, during which a household in need is not being served and (subsidized) rent is not being paid. Early results from the pilot program show that the choice based system can significantly reduce the time and effort necessary to fill a vacant unit and promote more effective use of housing stock.

Since implementation in February, six posting cycles have been completed, with 52 units successfully leased in seven housing developments. So far the choice based system has performed strongly against the conventional waiting list model on key performance measures.

The first key performance measure is the length of time to fill a vacant RGI unit. Among the developments participating in the pilot program, it took an average of 45 days for staff to fill a vacant RGI unit under the conventional system in 2013. Under the choice based system, the time required to fill a unit has been cut by half, with an average of 22 days from the date the unit is posted until the lease is signed. Under the choice based system, participating applicants are also demonstrating that they are ready and able to move into a unit sooner. The average move-in date is 30 days after the unit is posted.

The second performance measure is the number of contacts required to find a household willing to accept the unit. In 2013, staff made 9 phone calls on average, prior to contacting a household willing to accept a housing offer. Under the pilot program, that number is down to 1.5 calls per successful housing offer.

The third performance measure is the acceptance rate for vacant units (i.e., the share of unit offers that are accepted by households.) Under the conventional model, for units in participating developments, only 24% of all offers were accepted in 2013 – while 57% were withdrawn and 19% were refused by the applicant. Through the first six cycles of the pilot program, the acceptance rate has climbed to 73%, with 14% being withdrawn because of lack of contact with the applicant and 13% were refused.

Based on the types of units and the profile of participants during the first six cycles, it is expected that these results will carry forward over later phases of the pilot program. Staff are therefore recommending full implementation of the choice based model across the social housing portfolio. Implementation will be guided by a series of benchmarks for system performance, with respect to system efficiency and equity in housing outcomes. Specific provisions will be made to ensure effective participation and accommodation for vulnerable households.

Updates to local rules to improve access to RGI assistance

Provincial legislation defines the regulations and requirements that apply to social housing in Toronto. Under the *Housing Services Act, 2011* (HSA) and the previous *Social Housing Reform Act, 2000*, the City has responsibility for establishing local rules for the waiting list system.

Many of the local rules established by the City have been in effect for over ten years. The April 2013 report identified a number of opportunities to update and improve local rules. During the second phase of the review, SSHA staff held extensive consultations with housing providers, community agencies and residents to evaluate and refine options.

The following section describes operational changes and policy recommendations to update local rules for RGI assistance, in the following areas:

- Eligibility for homeless priority
- Maintaining an active application
- Modified units
- Referral agreements
- Single-date RGI application
- Local occupancy standards
- Housing provider mandates

Eligibility for Homeless Priority

One in seven RGI vacancies is filled by households who are determined to be disadvantaged in accessing social housing through a chronological waiting list system (e.g., owing to urgency of need and/or experience of hardship or economic disadvantage).

In 2002, Council defined the types of households that qualify under this disadvantaged priority to include: applicants experiencing homelessness, separated families (i.e., where a child is in custody of a Children's Aid Society owing solely to lack of housing stability), homeless newcomers to Canada and youth (age 16 and 17).

A majority of households qualifying for the disadvantaged priority do so because they are experiencing homelessness. In 2013, 581 households were housed under the disadvantaged priority (96% of which qualified due to homelessness). Following the core service review of SSHA in 2011, the consultant report identified as a potential opportunity granting individuals experiencing homelessness a higher priority, such as increasing allocation for disadvantaged households to one in every five or six vacancies.

Staff reviewed this option and determined that, absent the creation of new housing stock, the adverse impact on non-priority applicants – who only qualify for a housing offer after all priority groups are exhausted – would be too high. Despite accounting for roughly 90% of all RGI applications, non-priority households accounted for just 48% of the units filled in 2013. Implementation would further restrict access to these households, resulting in even longer wait times for the majority of applicants.

In the interest of balancing the City's goal of ending homelessness with the need to treat all households equitably in the access system, staff are not recommending any changes to the priority category for homeless applicants at this time.

Instead, SSHA is working with service partners to create new housing support options for individuals and families who are experiencing homelessness in Toronto.

Over the past year, Council approved creation of a new \$3.7 million housing allowance program (known as the Housing Stability Allowance), targeted in part to long-term shelter users and chronically street homeless individuals. This is in addition to the Toronto Transitional Housing Allowance Program which has helped thousands of households to transition from or otherwise avoid homelessness since 2012.

As noted below, SSHA is also working with Toronto Community Housing to establish a referral agreement that will create a pathway into social housing for homeless households, which ensures that they receive the ongoing support they need in order to maintain successful tenancies.

Maintaining an Active Application

During the review, staff examined the policies and processes used by Housing Connections to maintain active applications on the waiting list. After submitting an application for RGI assistance, an applicant household must contact Housing Connections on an annual basis in order to provide up-to-date contact information and to confirm their continued interest in social housing. If a household does not make contact during the year, Housing Connections attempts to contact the household: first by letter and then by telephone. If Housing Connections staff cannot contact the household, the application is moved to inactive status. The application can remain inactive for up to 24

months prior to cancellation. If the household contacts Housing Connections at any point during the 24 months, the application is reinstated.

Because of the increasing number of applicants on the waiting list and the annual cycle, the confirmation of interest process is highly resource intensive for Housing Connections. The organization initiates approximately 2,000 letters and between 1,000 and 1,300 phone calls every month for this purpose alone. The process can also be onerous or stressful for applicants, with little apparent benefit in finding housing more quickly.

Furthermore, implementation of the choice based system will reduce the need for households to continuously update and manage their application files while they wait. For the most part, under a choice based system, households only need to provide up-to-date contact information and confirm eligibility at the time they indicate an interest for a particular RGI vacancy.

Therefore, the City is implementing changes to its policy concerning the time periods for the confirmation of interest process. The requirement that Housing Connections contact each applicant household to confirm interest in remaining on the active waiting list every 12 months will be changed to every 18 months. The period during which an applicant household can remain inactive will be changed from 24 months to 18 months. This change will not negatively impact applicants; they will still have a cumulative period of three years of inactive status prior to their application being cancelled. (Homeless applicants will continue to qualify for an extended inactive period of five years.) However, it will significantly reduce the administrative burden on Housing Connections by increasing the likelihood that a household will initiate contact (e.g., by checking their status or participating in the choice based system), thus avoiding the need for Housing Connections to issue a letter or call the applicant to confirm interest.

Housing Connections will also update the service channels available for submitting or updating the RGI application and the confirmation of interest process. To the extent possible, these services will be migrated to online service channels. Changes will be made to ensure availability of a range of options, accessibility for all households and use of the most cost-effective and client-responsive channels.

Modified Units

A certain portion of social housing units have been modified with specific attributes which meet the needs of applicants with various disabilities. Owing to the limited availability of these units, careful attention needs to be paid to ensure that applicants are appropriately matched to these units in an equitable and transparent way.

Since 2013, staff have been working with housing providers to create a comprehensive inventory of modified units in the portfolio. Once fully compiled, this information will be catalogued and advertised to prospective applicants, in addition to other unit features, through the choice based system.

Referral Agreements

One of the most important tools for providing access and stability to vulnerable households is a referral agreement between a support agency and a housing provider. In 2013, approximately one thousand units in the TCH portfolio were subject to referral agreements. Under a referral agreement, a household is housed in an RGI unit and receives time-limited or ongoing support services in order to maintain a successful tenancy. Because applicants are housed through referral agreements based on assessed need rather than priority status or wait times, they provide an effective and expedited way to get people off the street, out of shelters or discharged from institutional settings, and into stable housing. For the same reason, it is necessary to ensure that the process for housing people under referral agreements is fair, transparent and leads to positive housing outcomes.

Since 2013, the City has made progress on initiatives intended to improve administration and approval of referral agreements. The first is a comprehensive inventory of existing referral agreements, many of which long precede City administration, which is being developed in partnership with housing providers.

The City is also working with TCH to establish terms for a new referral agreement that respects the interests of both the housing provider and the support agency. This agreement will commit a certain number of RGI units to vulnerable households, including those experiencing homelessness referred through the City's Streets to Homes program. City staff will support referred households to meet their rent, maintain a positive relationship with the landlord, and integrate into their community. The referral agreement will allow the City to better leverage social housing stock in its "housing first" approach to addressing homelessness. The terms and principles established as a part of this agreement will form the basis for development and approval of future referral arrangements with other social housing providers.

Single-Date RGI Application

Offers of RGI assistance are made in sequence to applicant households based on their priority status and ranking dates. The eligible applicant with the earliest ranking date receives the first housing offer. (This does not change under a choice based system.)

Currently, an applicant household is assigned a unique ranking date for each housing provider preference, based on the date the preference was added. (e.g., if an applicant first applied for RGI in 2004, but added a preference for a new housing provider in 2013, they would be assigned a 2013 ranking date for that preference.)

This method for ranking applications, referred to as multi-date ranking, was adopted in 2002 to protect the status of incumbent applicants at a time when separate waiting lists for hundreds of housing providers were consolidated under the centralized waiting list system. More than a decade later, the primary rationale for the multi-date ranking method, as a transitional measure, no longer applies.

More importantly, the multi-date ranking method negatively impacts the vast majority of applicant households on the waiting list. Because households are assigned a new ranking date each time they indicate a new housing preference, the date they apply for RGI assistance is not directly relevant to their position on the waiting list or, for that matter, when they might receive an offer of housing. As such, a household could have first applied for RGI assistance a decade ago and maintained an active application over that time; but, if there is a need or desire to add a new preference today, that household would effectively be treated as a new applicant for the purposes of the waiting list.

This penalizes households that encounter life changes during their wait for social housing that could include the birth of a child, a job change or the onset of a health condition that necessitates particular unit features (e.g., mobility modifications) or nearby health services.

Therefore, as described in the April 2013 report, the City is working with service partners to phase in a single-date ranking method by the end of 2015. The single-date ranking method uses the date the households first qualified for RGI assistance for all housing preferences. This change will create more transparency for clients and service providers, will reduce complexity and will make the system outcome-focused for all applicants.

This operational change does not impact priority applicants, who will continue to be ranked according to the date they first qualified for their priority.

The single-date ranking method complies with terms of legislation and is consistent with ranking schemes used by other major Ontario jurisdictions, including Ottawa and all GTA municipalities.

Local Occupancy Standards

Under the HSA, the City has authority to determine the size of unit a household will qualify for when applying for or receiving RGI assistance. The City's Local Occupancy Standards define the number of bedrooms a household can occupy based on household size, composition and any special requirements. The Local Occupancy Standards were first adopted by Council in 2002, and subsequently amended with minor modifications in 2010.

Based on a jurisdictional scan and feedback received through consultations, staff have identified a number of opportunities to update Toronto's Local Occupancy Standards, to ensure that the system is client-centred and provides choice to applicants, while also making efficient use of housing stock.

The primary change is to eliminate the City's requirement that two children of the "same sex" in a household must share a bedroom. This policy was adopted in 2002, and applies to all households without exceptions for the relative age of the children or behavioural, gender, sexual orientation, or mental health considerations. (Households can apply for an additional bedroom for a child because of the child's disability or medical condition.) As a result, households with children may have to accept difficult or inappropriate living

conditions in order to receive RGI assistance. Inadequate accommodation for children has been linked to a range of issues, including poor academic performance, health issues and/or behavioural problems. This change is intended to provide families with the discretion to decide what housing best meets their needs.

Additional amendments to the Local Occupancy Standards are also being recommended to clarify terms, to update language and to identify specific provisions and requirements for those requesting an additional bedroom. These changes are intended to align the City of Toronto's standards with those of other municipalities in Ontario, including the entire GTA and the City of Ottawa.

All changes to Local Occupancy Standards recommended for Council approval are provided in Appendix A. These changes are summarized as follows:

- Remove the requirement that two children of the same sex share a bedroom when receiving RGI assistance.
- In response to the needs and preferences of large families, permit up to 3 children to share a bedroom in larger units, if requested by the household and occupancy is in compliance with Municipal Code Property Standards.
- Clarify the terms under which an additional bedroom will be granted for a child *not* residing with the household on a full-time basis to state that a household member must be a parent or legal guardian of the child.
- Make minor additions and revisions to the terms under which a household may qualify for an additional bedroom as a result of a disability, medical condition, support services or for equipment storage in order to clarify purpose, documentation requirements and exceptions.
- Provide a definition of "overhoused" to be used for the purposes of assigning priority on the centralized waiting list. A household is overhoused when the unit they occupy has more bedrooms than they are eligible for under Local Occupancy Standards. Overhoused households are required to move to a unit size they are eligible for.

Housing Provider Mandates

In 2002, City Council adopted a policy regarding mandates, which permit housing providers to restrict access to RGI assistance to applicant households that meet a specific set of criteria established by the housing provider. All mandates must be approved by the City and be compliant with the terms of the Ontario *Human Rights Code, 1990* (the Code).

When reviewing mandates for approval, the City strives to give balanced consideration to the interests of specific communities, that may be well-served by a housing provider mandate, and the broader public interest for equitable access to a publically-funded

housing benefit. However, because the existing mandate policy is broadly permissive, it is difficult for staff to ensure that the public interest is protected when reviewing and approving new mandates for housing providers.

The recommendations in this report are designed to ensure that, when granting a mandate, there is a sound policy rationale for doing so, and the interests of all applicant households are protected over the long term. This is particularly important when authorizing a mandate under Section 18 of the Code, which allows a housing provider to restrict RGI assistance to members of specific ethno-cultural, religious or other institutionally-affiliated communities.

The following changes are recommended to the housing provider mandate policy for approval by City Council:

- To limit the approval of new mandates, permissible under Section 18 of the Code, to housing providers that provide community-specific services and long-term care to seniors households. Housing providers seeking such a mandate will be required to submit a business case that demonstrates a rational connection between the mandate and the community-specific programming offered to residents. Possible reasons for the restriction could include:
 - culturally-sensitive feeding and care of elderly
 - recreational programs
 - language programs
 - education and cultural preservation programs and
 - traditional cultural foods.
- The term of new mandate agreements will be limited to five years, renewable by mutual assent of both parties. This change will ensure that the housing provider continues to meet the City's objectives with respect to the provision of RGI assistance over the long-term.

The City's housing provider mandate policy, recommended for Council approval, is provided in Appendix B.

Improving the use of technology and the customer service experience

As highlighted in the *2014-2019 Housing Stability Service Planning Framework*, excellent customer service must underpin the client experience for households that approach the City and its service partners for housing support. Over the past year, SSHA and Housing Connections have taken a number of steps to evaluate and improve the customer service experience.

In early 2014, a survey of applicants and recently housed households was conducted to better understand the system user experience. Respondents indicated general satisfaction with their customer service experience through Housing Connections, including the availability of technology-enabled service channels. However they expressed a desire for more options, better information and outcomes-focused support.

In conjunction with this survey, Housing Connections and City staff have taken a number of steps to improve the use of technology and customer service experience since the beginning of 2013, including the following:

- Through implementation of the *My Choice Rental* pilot program,
 - developed and tested a web-based user interface that provides more in-depth and timely information about available RGI units than is currently available
 - implemented a choice-based system, which evidence demonstrates is a more responsive, client-centred and transparent process for allocating RGI units
- Developing recommendations and implementing changes to local rules for RGI assistance that will contribute to a more transparent and responsive client service experience.
- To improve the phone-based service channel, fully implemented an Interactive Voice Response (IVR) system that provides applicants with more options for automated self-service help, improves workflow and reduces queue and response times. (Applicants still have the option to speak with a representative in-person.)
- Introduced new customer service standards, a revised training program for staff development and a staff-involved review of business processes. These initiatives led to improved performance in processing priority applications and improved workflow and output in processing documents.
- Added additional public access computers to the Housing Connections Resources Centre to promote and support use of online service channels.
- Implemented applicant workshops, held three times per month, to provide applicants with knowledge about application maintenance, available services and community resources.
- Conducted strategic planning and consultations, and moved forward on a website redesign to improve functionality for clients and to ensure ease-of-access and compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*.

- Developed plans for placement of a Housing Help Centre worker at the joint Toronto Employment and Social Services and Children's Services Metro Hall service counter to support shared clients access housing services.

Effective customer service also necessitates effective information collection and tracking, in order to facilitate evaluation and future service planning. At present, there is a primary focus on the length of the waiting list as a single indicator of (unmet) housing need.

However, despite the attention it receives, it tells us little about the particular circumstances of applicants, how to best target investments and services to meet specific needs (e.g., housing benefits versus housing supports) or the functioning of the access system as a whole. Therefore, steps will be taken to improve the collection and reporting of service information by developing detailed performance indicators that define and measure the achievements of housing service goals and objectives.

An integrated access model for housing services

Over the next five years, as a part of the key actions outlined in the *2014-2019 Housing Stability Service Planning Framework*, SSHA is moving forward in implementing an integrated model for delivery of housing access services. This will include 1) a common intake and assessment process to streamline eligibility determination for a range of services and 2) a multi-service housing registry to ensure that households are provided access to a range of options to meet their housing needs, in a fair and comprehensive way.

This work will be coordinated with other human services integration initiatives by SSHA, Toronto Employment and Social Services (TESS) and Children's Services. These divisions are currently exploring opportunities to better integrate front-end service delivery and back-end administration in human services systems, to shift service delivery to more efficient and client-focused channels and develop a targeted approach to serving vulnerable clients.

There is clear value in pursuing integration of a range of housing benefit programs, from both a client and administrative perspective. At present, there are at least six different housing benefit programs provided by various City divisions and community partners without formal coordination in administration or delivery. Each program provides a different type and/or level of support to address the spectrum of housing needs. They include the following:

- RGI assistance provided to households in social housing and rent supplement units (administered by SSHA)
- Housing allowance programs, including the Toronto Transitional Housing Allowance Program and the Housing Stabilization Allowance (administered by SSHA in coordination with various service partners)
- Housing Stabilization Fund, which is available to social assistance recipients (administered by TESS)

- Emergency Energy Fund, which is available to low income residents not receiving social assistance (administered by TESS)
- Rent Bank loans (administered by SSHA and delivered by community agencies)
- Below-market rent units available in new affordable housing developments (administered by the Affordable Housing Office and SSHA)

The purpose of integrating access to housing services is to provide households in need with information about all available housing services, through multiple channels and a range of providers (i.e., "no wrong door" service). Wherever possible, common assessment and/or referrals will be pursued to better target these services to meet specific short- and long-term housing needs.

Under an integrated model, the City would continue to meet its legislated obligations under the HSA but would also expand from a limited supply of traditional subsidized social housing to coordinated access to a range of existing housing benefits and services to support Toronto households in need.

The first two integration initiatives, a common intake and assessment model and a multi-service housing registry, are described below. A transition plan will be developed for implementation of these system changes. The scope of this plan is described at the end of the section.

Common Intake and Assessment

During public consultations, respondents indicated a desire for more information, more options, and better access to a range of services. At present, if an applicant wishes to apply, or just get direct information about available housing-related services offered by the City of Toronto, they must contact staff in at least two different divisions (SSHA and TESS), or one of the many different community agencies involved in service delivery. With a few exceptions, each service has its own process for determining eligibility.

Under an integrated model, households will be provided with coordinated access to a range of housing services, through a common intake and assessment function. Implementation of this function will occur through a three stage approach.

The first stage is more effective information-sharing between service providers, such that households can reasonably expect to find out about the full range of housing services and options they may qualify for, regardless of their point of entry to the system. The City will work with service partners to ensure that they have the information resources they need to provide comprehensive system support.

The second stage is more formal cooperation between service providers for the purpose of making referrals between services systems. Such referrals may be appropriate when an applicant presents with a housing need better addressed through an alternative service

system. For example, a household that is ineligible for emergency support through the Housing Stabilization Fund could be referred to a Housing Help Centre for a Rent Bank loan. SSHA will work with other City divisions and service partners to develop an effective and accountable referrals process.

Third is a common eligibility assessment for multiple different services, whereby eligibility determination for one service allows access to another. Considerable opportunity exists here in terms of developing common application forms, document sharing (with applicant consent) and automatic income verification. SSHA staff are working with staff from other City divisions to explore these opportunities further.

Multi-Service Housing Registry

A waiting list, or registry function, is a necessary part of any service system where need exceeds supply at a given moment. It is the part of the system that allows for households to apply for a service that may not be immediately available, but that, through maintenance of an application database, can be allocated in an equitable and transparent way over time.

At present, the registry function for housing services in Toronto is limited to the centralized waiting list for social housing. When an applicant is placed on the waiting list they are generally only considered for RGI assistance. Access to other housing programs, such as housing allowances, has typically been provided to applicants on an ad hoc basis, either through service referrals or by periodically selecting recipients from the waiting list (according to waiting times and range of other program-specific criteria). However, access to a range of services is not a formal component of the current waiting list system.

Under an integrated model, the centralized waiting list would be maintained for RGI housing, in accordance with legislated requirements and subject to the recommendations introduced in this report. But it would also be expanded to include other services that meet short- and long-term housing stability needs.

RGI assistance is the preferred service option for a significant share of households. However, the results of consultations indicate that households are looking for a range of service options. Under a multi-service housing registry households would simultaneously be considered for other services: housing allowances, below-market rent affordable housing units or other housing benefits and supports, as they become available.

With the consent of applicants, the multi-service housing registry will also create opportunities for better information sharing (for example, to update client contact information) and for referrals to other service systems, such as the Coordinated Access to Supportive Housing (CASH) system funded by the Toronto Central Local Health Integration Network. (Recent research has shown that there is considerable overlap among applicant files in the centralized waiting list and the CASH systems.)

Transition Plan for Integration of Housing Services

Through this report, Council is directing staff to implement an integrated model for housing services, including common intake and assessment and a multi-service housing registry. Following Council approval, a transition plan will be developed for integration of housing services, in consultation with service partners, including TCH.

This plan will include changes to administration and delivery of RGI and related services to ensure that the service model supports the critical success factors described in this report. Where existing service arrangements – such as partnerships, agreements, and resources – can be modified to better meet the needs of households, changes will be made or alternative options will be pursued.

A particular emphasis will be placed on the evolving role of Housing Connections and the function it provides related to access to RGI housing. This function will be central to a new integrated housing access model, and the City will need to work with TCH to align this function more closely with delivery of other housing services. This will involve a review of the 2002 centralized waiting list service agreement between the City and TCH and, once a new model has been designed, potential changes to this agreement. Any organizational implications for Housing Connections or TCH will be brought forward for Council approval. The City will work with TCH, Housing Connections and service partners to ensure that any recommended organizational changes will respect the interests of staff, applicants and the general public.

Province's responsibility to support victims of domestic violence

In the April 2013 report, staff highlighted the challenges of the legislated Special Priority Policy (SPP) for both applicants and service providers, and Council called on the Province to enter into a constructive dialogue regarding improvement to this policy. The policy requires that victims of domestic abuse are given first priority for any vacant RGI units and has been used by the Province to achieve a provincial service objective through the municipally managed social housing system. It has had significant impacts on waiting times for other applicants, including other priority households.

Although they represent between two to three percent of households on the waiting list, SPP applicants account for close to a third of all applicants housed in Toronto each year. Many social housing providers have been exclusively housing SPP applicants without any capacity to respond to the special needs of this population. A recent Ontario Municipal Social Service Association study examining the province-wide impact of the Special Priority Policy has confirmed that this is consistent with the experience of other Ontario municipalities.

Victims of domestic violence are not well served by this policy, which can typically result in waiting times of up to 12 months, and does nothing to ensure that they have the health, family and trauma-related supports they need after being housed. Furthermore, the Special Priority Policy effectively transfers the financial burden for a provincial service responsibility to municipal governments.

After failing to receive a response to the request in the April 2013 report, the City is once again calling on the Province to establish a dedicated housing benefit, such as portable rent supplements, to better meet the needs of these high priority households and ensure the equitable treatment of all people seeking access to housing services in Ontario.

CONCLUSIONS

The policy recommendations and operational changes described in this report are essential steps towards improving the access system, in line with the "critical success factors" established at the beginning of this review.

Building on the success of the pilot program and moving towards broader implementation of the choice based system across the social housing portfolio will move households to the centre of the access system. As requested by applicants, the choice based system provides comprehensive information and more responsive options than are currently available. The choice based system will build transparency into the allocation process and will ultimately lead to fewer vacant units, greater resident satisfaction and better housing outcomes.

The changes to local rules in this report were developed and evaluated through a range of consultations with stakeholders. The intent of these changes is to ensure that the City's social housing policies are responsive to the needs of applicants while ensuring equitable and appropriate use of social housing stock. Therefore, staff have recommended changes to the local occupancy standards and social housing provider mandate policies that achieve a balance between these considerations. The City is in the process of implementing operational changes to the application process (e.g., the confirmation of interest process and the dating of applications) to achieve more transparency and ease the administrative burden on clients. The City and its partners are also implementing changes to benefit vulnerable households, including clarifying the priority for disadvantaged households and establishing a new referral agreement.

In addition to the choice based system, which will transform the way applicants receive service to access social housing, a number of customer service initiatives have been implemented since 2013. Through new standards, training and improvements to service channels, the City and Housing Connections have made changes that will lead to easier access to service, greater understanding of processes and better service outcomes.

Finally, the opportunities for service integration, as put forward in this report, will fundamentally change the way households are able to access housing services and options in Toronto. A common intake and assessment process will streamline and coordinate the eligibility and documentation requirements for multiple programs to minimize the burden on households. Wherever possible, greater connectivity will be achieved between service systems so that clients can reasonably expect "no wrong door" access to housing and related services and options. And through implementation of a multi-service housing registry, which builds on the foundation of the centralized waiting list system, applicants will no longer be restricted to a single option for housing assistance but will have the

opportunity to pursue multiple pathways (such as RGI, housing allowances, below-market rent units, short- and long-term benefit options) to housing stability.

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ATTACHMENTS

Appendix A – Local Occupancy Standards
Appendix B – Mandates for Social Housing Providers

Appendix A

Local Occupancy Standards

The local occupancy standards apply to all rent-geared-to-income units administered by the City of Toronto, under the *Housing Services Act, 2011*. Notwithstanding other eligibility requirements defined through legislation or by the City of Toronto a household can apply for and reside in a rent-geared-to-income unit, of a certain bedroom size, in accordance with the requirements detailed below.

1. A household is eligible to be housed in a unit of a size determined in accordance with the following principles:
 - a) For adult household members who are spouses of each other, two (2) persons per bedroom.
 - b) For adult household members other than spouses, a minimum of one (1) and a maximum of two (2) persons per bedroom .
 - c) For children under the age of 18, no less than one (1) and no more than two (2) persons per bedroom where the unit contains three (3) or less bedrooms.
 - d) For children under the age of 18, no less than one (1) and no more than three (3) persons per bedroom where the unit contains more than three (3) bedrooms. If the shared bedroom provides the minimum space requirements under the City's Municipal Code Property Standards.
 - e) A single parent is eligible for a unit in which the parent shares a bedroom with a child, if the applicant requests it.
 - f) Bachelor units are normally given to single persons. However, a two person family is eligible for a bachelor unit, if the applicant requests it.
2. A person is a child of the household for the purposes of these occupancy standards if:
 - a) A parent or legal guardian of the child is a member of the same household.
 - b) The child does not have and has never had a spouse and is not the parent of a person living in the household.
 - c) The child is in regular attendance at a recognized educational institution and, while in attendance, does not live with the household. The child lives with the household while not attending that educational institution.
 - d) The child is dependent, in whole or in part, on the household for financial support.

- e) A child who is normally a member of the household, but who is taken into the temporary care of a Child Welfare Agency, continues to be part of the household for the purpose of determining applicable occupancy standards provided there is a plan of care for the child's return to the household.

Permanent wards of a Child Welfare Agency or of the Crown under the Child and Family Services Act *are not* considered part of a household for the purpose of determining applicable occupancy standards.

3. An additional bedroom may be allocated for any of the following reasons:

- a) One of the spouses requires an additional bedroom because of a disability or medical condition, and this requirement is documented by a medical professional. Subject to the following conditions:
 - a. The household must submit the City-approved form(s) and required medical documentation with the request.
 - b. Where a medical professional has verified that spouses cannot share a bed, the household will not normally qualify for an additional bedroom unless a second bed cannot be accommodated within a shared bedroom.
 - c. A household will not qualify for an additional bedroom based on a snoring condition alone.
- b) An additional room is required to store equipment that a member of the household needs because of a permanent disability or medical condition, and the equipment is too large to be reasonably accommodated in a unit size for which the household would normally qualify under Section 1. Subject to the following conditions:
 - a. The household must submit the City-approved form(s) and required medical documentation, detailing the size and type of equipment required, with the request.
 - b. Equipment that *will not* normally qualify a household for an additional bedroom, includes, but is not limited, to the following:
 - i. continuous positive airway pressure (CPAP) machines;
 - ii. air-filtration systems;
 - iii. vaporizers or humidifiers;
 - iv. walkers, wheelchairs, or scooters;
 - v. massage tables; or
 - vi. exercise equipment.

- c) An additional bedroom is required for an individual who is not a member of the household but who occupies the unit to provide full-time support services to a member of the household. The household must submit the City-approved form(s) and required medical documentation with the request.
- d) A member of the household is pregnant and the provision of bedroom space for the child would entitle the household to an additional bedroom in accordance with Section 1. The household must submit a letter confirming the pregnancy from the pregnant household member's primary health care provider (certified by the Province of Ontario).
- e) A member of the household has shared custody or access rights with respect to a child who is not a member of the household; and
 - a. the household member is either a parent or legal guardian of the child;
 - b. the household member is subject to a Court Order or a domestic contract that is valid under the Family Law Act and that is in writing and signed by both parties and witnessed; and
 - c. the Court Order or domestic contract states that the household member is required or permitted to provide overnight accommodation for the child, at least 78 nights per year and the bedroom is required to provide adequate accommodation for the child.
- 4. A household receiving rent-geared-to-income assistance is classified as "overhoused" when that household occupies a unit with more bedrooms than are permitted under the local occupancy standards.

Where a household occupies a unit with more bedrooms than are permitted under the local occupancy standards as a direct result of a death of a household member, the household is not classified as "overhoused" for a period of six (6) months after the death occurs.

Appendix B

Mandates for Social Housing Providers

Under the terms of the *Housing Services Act, 2011*, an approved mandate permits a social housing provider to restrict access to rent-geared-to-income (RGI) assistance to households that meet eligibility criteria established by the housing provider, which are permissible under the Ontario *Human Rights Code, 1990* (the Code) and are approved by the City of Toronto.

In addition to any other terms or conditions established through agreement between the City and the housing provider, approved mandates shall meet the following requirements:

1. The minimum age of eligibility for RGI units subject to a seniors mandate is 59.
2. A mandate to restrict RGI assistance to members of specific ethno-cultural, religious or other institutionally-affiliated communities (Section 18 of the Code) is subject to the following:
 - a. the housing provider is a religious, philanthropic, educational, fraternal or social institution or organization primarily engaged in serving the interests of persons identified by a prohibited ground of discrimination under Part I of the Code;
 - b. the housing provider must submit a business case that demonstrates how the service mandate for RGI assistance is necessary for the provision of additional services or facilities that serve the interest of persons identified by the prohibited ground of discrimination;
 - c. the RGI units subject to the proposed service mandate are also subject to a seniors mandate; and
 - d. the housing provider or its parent or related organization must own a long-term care facility in Toronto, accredited by the Ministry of Health and Long-Term Care.
3. A mandate to restrict RGI assistance to households facing hardship or economic disadvantage (Section 14 of the Code) is subject to the following:
 - a. the housing provider must submit a business case that demonstrates how the service mandate for RGI assistance is necessary for the provision of a special program that relieves hardship or economic disadvantage, assists disadvantaged persons or groups to achieve or attempt to achieve equal opportunity or that is likely to contribute to the elimination of the infringement of rights under Part I of the Code.
4. The housing provider provides a satisfactory indemnity in favour of the City with respect to the cost of any litigation arising out of an alleged failure to comply with the Code.

5. City-approved mandates will be subject to a five (5) year term, renewable according to the terms set forth in a mandate agreement.