



Ombudsman Toronto Report:

Toronto Community Housing Corporation's Medical and Safety at Risk Priority Transfer Process for Tenants - Update on Implementation of Investigation Recommendations

March 15, 2019

INTRODUCTION

The January 2018 Investigation Report

1. Ombudsman Toronto published a report January 24, 2018 on its Investigation into Toronto Community Housing's system for handling tenant transfer requests to address medical or safety concerns.
2. At the time of the investigation, 1,400 TCHC households were on a waitlist to be moved. These tenants had been approved for a Medical or Safety at Risk priority transfer because their current unit put their health or safety at risk.
3. Ombudsman Toronto reviewed over 600 applications and found many problems with the process, resulting in unfair treatment of TCHC tenants.
4. The Investigation found that tenants who were approved for a priority transfer waited for years on a bloated waitlist; over half had been on the priority waitlist for five years or more.
5. Further, the process was not effective in moving tenants with a critical and immediate need for a unit change. This was in part because of a higher priority level assigned by the City for households that were deemed "Overhoused" because they have more bedrooms than required. The more than 1,300 Overhoused households had a higher priority for unit transfer than all households whose units put their health or safety at risk.
6. As a result, TCHC would sometimes transfer tenants outside its own process. TCHC handled applications inconsistently, lost applications, and did not provide adequate training to staff making decisions about transfer applications.

7. The Ombudsman concluded that the previous priority transfer system was unfair to tenants. It gave a false expectation of a speedy transfer to waitlisted Medical and Safety at Risk tenants. It did not prioritize transferring tenants with the most urgent safety and health needs. The Ombudsman recommended¹, among other things, that TCHC:

- Create a new Crisis category with clear criteria for the most serious cases
- Develop a fair application, evaluation and communication process for the new Crisis category
- Apply the new process correctly and consistently
- Make Crisis unit transfers in a timely manner
- Design a fair outcome for those on the legacy Medical and Safety at Risk waitlist

Direction by Toronto City Council

8. On January 31, 2018, Toronto City Council passed motions to accept the Ombudsman Toronto report and to direct TCHC and the City to implement its recommendations. Council also passed a motion asking the Ombudsman to report to City Council in the first quarter of 2019 on TCHC's progress in implementing the recommendations in the Investigation report.

THE ROLE OF OMBUDSMAN TORONTO

9. Ombudsman Toronto independently and impartially investigates allegations of administrative unfairness in the actions or omissions of Toronto's City government, including most City agencies, corporations and adjudicative boards. We identify what went wrong and, when appropriate, recommend improvements in the public interest.
10. We are a small office. We publish our reports and in some cases, we present them to City Council. After that, we follow up to ensure that our recommendations are implemented in a reasonable time. We also monitor new complaints to Ombudsman Toronto concerning the same issue.
11. We follow up on the implementation of our recommendations to ensure that City organizations or divisions (in this case, TCHC) consider the issues we have raised and take action, while allowing them to craft specific solutions that will work.

¹ To see the full list of Ombudsman Recommendations, see the chart at Appendix A, which includes the steps taken by TCHC since February 2018 to respond to these recommendations.

12. They are ultimately responsible for the administration of the services they provide. We do not direct them to implement recommendations in any particular way, but leave them to decide what specific changes will best address the Ombudsman recommendations. They are accountable to Council and to the public for those changes.

OMBUDSMAN TORONTO'S IMPLEMENTATION FOLLOW UP WITH TCHC

13. Since we published our report in January 2018, TCHC has reported to us regularly on its progress developing the Crisis transfer category and implementing it. TCHC promptly provided a work-plan, and has continued to deliver within established timelines. It has been a complex and intensive process.
14. We provided feedback on draft policy and processes and on draft communication for tenants. TCHC invited us to attend one of the four tenant consultation sessions it held, and we did.
15. We held quarterly meetings with senior TCHC management responsible for implementation. TCHC responded to our questions and concerns appropriately, and addressed gaps in policy or practice that we raised.
16. One challenge for TCHC to address was how to craft a plan to fairly serve the tenants who had been on the old waitlist. TCHC told us that it consulted with stakeholders and based its decision particularly on tenant feedback. TCHC decided to dissolve the old waitlist, while offering a one-time opportunity for tenants to select from a list of available units, in order of tenants' priority on the legacy waitlist. We understand that this plan is underway and in the offer stage.

IMPLEMENTATION OF THE RECOMMENDATIONS BY TCHC

17. TCHC is in the best position to describe and explain the substantial work it has done in response to the 21 recommendations in our January 2018 report. For easy reference, TCHC provided Ombudsman Toronto with a chart showing its implementation progress. It is attached to this report as Appendix A.
18. TCHC told us there were 1,749 applications during the first six months of the Crisis category implementation, of which TCHC approved 197. From that group, TCHC relocated 96 applicants, 14 are at the offer or unit search stage, and 87 tenants refused the units TCHC offered.
19. Forty-one (41) tenants whose applications TCHC denied requested a procedural review. In 32 cases, TCHC upheld its decision to deny the application. The rest are under review by TCHC.

Brief Chronology

20. Between February and June, 2018, TCHC undertook planning and development work. This included:

- Defining a Crisis transfer category that ranks higher than the Overhoused category, with approval from the City's Shelter, Support & Housing Administration Division
- Creating an internal working group
- Consulting with stakeholders
- Recruiting and training staff
- Establishing a dedicated team to administer the Crisis transfer process
- Developing a communication plan to inform tenants of changes
- Gathering community feedback about how to handle the legacy waitlist
- Developing Rules of Procedure for the entire Crisis transfer policy process including application, decisions, procedural review, offer process etc.

21. In June 2018, TCHC communicated the details of the new Crisis priority transfer plan to tenants.

22. On July 1, 2018 TCHC implemented the new Crisis transfer category and priority transfer process and began accepting applications, meeting the timelines recommended by Ombudsman Toronto.

23. Next, TCHC created a unit selection and matching process for the 1,400 legacy waitlist households. TCHC told these tenants about this process in November 2018 and sent each a list of available units meeting their unique requirements in December 2018. Four hundred and thirty-four (434) households on the legacy waitlist participated, responding to TCHC with a list of the units from those being offered that they would accept.

24. The first round of matching was completed in January, 2019 with 257 households matched with available units. TCHC is currently conducting a second round of matching, and attempting to increase participation, as fewer than half those eligible participated in the first matching exercise.

COMPLAINTS TO OMBUDSMAN TORONTO ABOUT THE NEW PROCESS

25. In the first six months of the new Crisis priority system, Ombudsman Toronto received 46 complaints about it from 39 different complainants. Most of these (30) we referred back to TCHC to complete its own internal complaint process.

26. Ombudsman Toronto conducted an informal Enquiry for each of the other 16 cases. Generally, complainants said there were delays in the adjudication process, or alleged that their application had been unfairly denied. We were able to resolve each complaint to Ombudsman Toronto's satisfaction. In doing this work, we also found opportunities to help TCHC fine-tune its new process and improve service for tenants, as set out below.

IMPLEMENTATION CHALLENGES

Creating a clear process to handle exceptional cases

27. Ombudsman Toronto reviewed a number of compelling tenant circumstances that did not fit squarely within the new Crisis criteria for various reasons.
28. For example, the Crisis priority transfer system requires that any tenant applying for transfer as a Victim or Witness Suffering Intimidation must be at risk of death or serious bodily injury due to a "deliberate, continued, verifiable and immediate" threat that can be addressed by a unit transfer. The policy requires that police provide documentation of the incidents and risk. Ombudsman Toronto learned that some tenants may feel they cannot contact police because they believe that doing so may be dangerous for them.
29. In particular, we heard from a woman who feared her gang-involved ex-partner would retaliate or cause her to be harmed if she reported his threats to police.
30. TCHC also reported to OT a case that did not fit neatly into the new Crisis criteria but demonstrated urgent health and safety needs. Specifically, it involved a new mother whose living situation was so dire from a safety perspective that Children's Aid Services had briefly removed the infant from her care, while a social worker helped the mother to apply for a Crisis category transfer.
31. TCHC explained to us that the process contemplated that staff could escalate compelling exceptions to the CEO to order a discretionary transfer where the situation warranted it.
32. We learned however that this exercise of discretion outside of policy was not initially codified in the Crisis Transfer Rules of Procedure. Ombudsman Toronto supported the exercise of discretion in exceptional cases, but recommended that it be inserted into the policy for clarity, consistency and fairness. TCHC agreed and made the change.

Challenges finding an effective way to confirm serious ongoing threat

33. To meet the Ombudsman's recommendation for an independent, clear and objective measure of threat, TCHC designed a Crisis questionnaire for police to complete, to document the dangerous incident and ongoing risk to an applicant.

34. While this worked well at first, TCHC told us that Toronto Police Services (TPS) later decided to decline providing written assessment of the level of risk, because of liability concerns. As a result, TCHC and TPS have committed to developing a different model of information sharing that will adequately meet the needs of both parties. TCHC reports that they continue to work with the TPS on a revised Memorandum of Understanding so that this process can proceed.
35. In the meantime, TPS officers are completing the sections in the Crisis questionnaire which outline the facts, but in most cases they have said they are unable to determine the level of risk in the final evaluative section.
36. TCHC said its staff can still approve eligible Intimidated Witness or Intimidated Victim applications, in one of three situations:
- a. The facts set out by the TPS officer are clearly within TCHC's definition of continued heightened risk;
 - b. The case is one of a few in which the TPS officer has noted their evaluation of the risk as high; or
 - c. The matter is lacking in independent evaluation of risk, but the specialist feels the application is so persuasive that it requires further review. In that case, it is escalated through the prescribed path and the CEO can decide to approve it. This has happened twice.

High volume of applications at introduction of the new priority transfer system

37. In the first six months of the process, TCHC received 1,749 applications. TCHC expected a surge at the beginning of the new process, but the volume was even higher than anticipated: there were as many applications in the first quarter of the new process (July 1 – September 31) as there had been in all of 2017 under the old process. While TCHC forecasted a rapid dissipation in the number of applications submitted, numbers stayed relatively high for some time.
38. This unexpected volume led to delays in decision-making, outside the planned timelines. TCHC responded by bringing in additional contract staff to handle the initial high volume.

Need to clarify how TCHC evaluates applications and communicates its reasons for decisions

39. In one case, a tenant came to Ombudsman Toronto dissatisfied with the denial decision she received. It did not acknowledge some key elements of her application, including the reasons she had given for being unable to obtain a police report. Further, the tenant claimed that she had provided phone numbers of witnesses and professionals who wrote letters of support, but TCHC had not followed up with any of them.

40. TCHC told Ombudsman Toronto that in evaluating applications, staff do more than simply make a decision based on the information the applicant puts forward. They also explain to the applicant what information is required for a successful application. However, TCHC staff do not take on an investigative role, or seek out further evidence than what an applicant has provided.
41. Ombudsman Toronto shared with TCHC the tenant's concern about the adequacy of the reasons in her decision letter, and encouraged her to request a procedural review. In particular, procedural fairness requires that the decision maker provide reasons, so that tenants can assess whether the decision maker adequately considered the evidence. TCHC upheld its decision on review and provided more reasons. It also acknowledged some procedural fairness issues in how it had originally handled the case and used it as a training refresher for staff.

Low Acceptance Rates

42. TCHC pointed Ombudsman Toronto to the high number of approved Crisis transfer applicants who refused the new unit TCHC offered them (87 of 183 offers, or 48%). TCHC told us the reason tenants gave for refusing the new units offered in those cases was that they felt the units were in undesirable locations.
43. Ombudsman Toronto has encouraged TCHC to continue to seek tenant feedback to explain why some refuse the units offered, in order to guide future planning and policy development concerning transfers.

OMBUDSMAN TORONTO'S FINDINGS ABOUT TCHC'S IMPLEMENTATION OF THE RECOMMENDATIONS

44. TCHC has directly addressed all of Ombudsman Toronto's Investigation recommendations in a timely way and is responding with reasonable care to challenges during implementation.
45. TCHC management set tight timelines for the creation and implementation of the new program and have met them. We commend them for this.

OMBUDSMAN TORONTO RECOMMENDATIONS FROM THIS UPDATE REPORT

46. Ombudsman Toronto recommends that City Council accept this report and request any further updates on the Crisis Priority Transfer system from TCHC directly.

(Original Signed)

Susan E. Opler
Ombudsman

Appendix A

Last Updated: March 5, 2019

TCHC Priority Transfer Follow-up (COMPLETED BY TORONTO COMMUNITY HOUSING FOR OMBUDSMAN TORONTO)

#	Recommendation	Actions Taken	Person(s) Responsible	Date of Completion	Stage
1	The City, pursuant to its authority as Service Manager, should create a new priority transfer category for TCHC called Crisis, to rank below SPP but above Overhoused.	The CEO has obtained the City's authorization to implement the priority transfer category as recommended.	CEO	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete
2	The new Crisis priority transfer category should have specific, clear and understandable eligibility criteria that TCHC will commit to applying consistently and in good faith. This is essential for TCHC to fairly serve tenants whose units are causing or contributing to a direct, immediate, elevated and acute risk to their health or safety that would be addressed if they moved to a different TCHC unit. TCHC should develop these criteria in consultation with the City and any other stakeholders it may wish to engage.	See Attachment: TCHC_1_Crisis Priority Categories.pdf Crisis categories were defined in clear and specific terms that meet the characteristics of direct, immediate, elevated and acute risk to health or safety. The very narrow criteria enables equitable assessment and facilitates clear communication. Extensive community and sector consultation included: • City of Toronto ○ Shelter Support and Housing Administration (SSHA) ○ Social Development and Financial Administration (SDFA) ○ Toronto Department of Public Health ○ Toronto SPIDER Table • Toronto Police Service • Toronto Victim Services	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete

		• Toronto Local Health Integration Network (LHIN) • Centre for Addiction and Mental Health (CAMH) • Workplace Safety and Insurance Board (WSIB) • Toronto Inter-Clinic Legal Working Group • HIV & AIDS Legal Clinic Ontario (HALCO) • CityHousing Hamilton • John Howard Society • LOFT Community Services • Ecuhome • Lumacare • Sunnybrook Hospital • St. Michael's Hospital • Toronto Community Housing staff (multiple focus groups by service discipline with both Management and frontline employee participants) • Toronto Community Housing tenants (using professional facilitation services in 4 community meetings attended by 270 Tenants).			
3	TCHC should provide clear, accessible and readily understandable information to tenants about what evidence is required to qualify for Crisis priority transfers, how to apply, and what will happen once they qualify.	See attached link: https://www.torontohousing.ca/transferconsultations Online, print material (brochures, posters and forms) include: • Context to the implementation of the Crisis Priority Transfer process • Detailed descriptions of the Crisis Priority Transfer categories • Overview of the application process describing how the request will be handled and assessed as	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete

		well as the steps following an approval and options following a denial. Material further includes a mix of text and diagrams accompanied with “Q&A” formatted information to assist with clarity. All material is available in translated language and accessible formats.			
4	The new process should clearly set out and explain the essential role of site staff to help tenants gather evidence to support their applications. This should be a key job duty of site staff.	See Attachment: TCHC_1_Crisis Priority Categories.pdf (Page 6 of 11) The process and staff training specifically defines the role of each involved staff member. Given that the process is primarily centralized with the Intake Specialists, the role of site staff is limited to orienting tenants to the qualification criteria, application process and coordinating immediate connection to an Intake Specialist. TSCs / OU Clerks / CSCs / Client Care Agents and their Managers are responsible for: • Being able to clearly describe the definitions of crisis and the process to apply for a Crisis Priority transfer to tenants. • Immediately referring tenants to the Intake Specialists. • Contacting the Intake Specialists to support tenant access to information upon request, and • Facilitating delivery of any important documents held by the Operating Unit to the Intake Specialist (should that be necessary). Intake Specialists will be responsible for:	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete

		• Receiving Crisis transfer referrals • Contacting Tenants to conduct interviews • Assisting Tenants to gather required documentation • Assessing applications against the Crisis eligibility criteria • Drafting decision letters and facilitating communication to the Tenant • Coordinating transfers including unit sourcing and relocation			
5	The new process should provide for thorough training and support for site staff. Site staff must have a solid understanding of the criteria, the process for applications and for housing offers, and the key role that they as site staff have in the process.	Frontline staff, including Operating Unit Managers, Tenant Service Coordinators and Operating Unit Clerks were trained in June, 2018 on the crisis categories, qualifying criteria and the end-to-end application process. Specific focus was placed on clarifying frontline staff accountabilities within the process (as described in Recommendation 4). Remedial training was conducted in November/December, 2018 to further assure staff understanding and facilitate an open question and answer forum.	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete
6	TCHC should develop Rules of Procedure for the processing of applications, decision-making and communicating of decisions with reasons for the new Crisis priority transfer category.	<i>See Attachment TCHC_2_Rules of Procedure.pdf</i> Rules of Procedure were drafted by TCHC Legal (in consultation with Operations) which set requirements for all parties involved in the process to ensure it is carried out in a fair and timely fashion. The Rules were reviewed with the City of Toronto (as Service Manager) and City Legal staff.	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete

7	The Rules of Procedure should set out clear timelines for each step of the process. Those timelines should take account of the seriousness of the issues being considered. TCHC should commit sufficient resources to ensure that it consistently meets the timelines it establishes. TCHC should have a system to periodically evaluate this.	<i>See Attachment TCHC_2_Rules of Procedure.pdf</i> The rules stipulate specific service levels for each step of the process (14-100) • Initial referral to Intake Specialist (Immediate) • Referral to any required emergency services (Immediate) • Initial Intake Specialist contact to tenant (< 2 business days) • Application support and documentation gathering (< 3 business days) • Assessment and initial response (2 business days) • Issuance of Notice of Decision letter (3 business days) • Unit identification for approved transfers (2 business days) • Relocation (1-5 business days) The base staffing model is comprised of 6 Intake Specialists and 2 Administrative Clerks. Volumes and service levels are monitored weekly and additional staff have been periodically sourced to support meeting demand. Monthly key performance indicators allow Management to monitor service delivery of the process. At present, this reporting is manual but business requirements have been included in the approved plan to implement an integrated housing management solution.	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete
8	TCHC should have a group of dedicated decision-makers evaluating applications for the	The decision making responsibility resides among the centralized group of Intake Specialists.	VP-Asset Management	March 31 st , 2019	☐ Not yet started ☒ In progress

	Crisis priority transfers. They should be trained in fair adjudication and decision-writing.	Intake Specialists have been enrolled in a certificate program at York University in Adjudication for Administrative Agencies, Boards & Tribunals. To balance with operational needs, staff have been enrolled individually over the course of January - March 2019.			☐ Complete
9	TCHC should require and ensure that decisions are made in a way that is procedurally and substantively fair. This includes ensuring that every decision includes sufficient reasons, and that similar cases are dealt with consistently.	Intake Specialists were trained on: - the definition of “crisis” - the process for application, supportive documentation gathering, assessment and relocation coordination - the Human Rights Code (in support of “Accommodation” based applications) - Decision writing standards (by TCHC Legal) Intake Specialists have also been enrolled in a certificate program at York University in Adjudication for Administrative Agencies, Boards & Tribunals. Decision Letters carry standards that demand the same quality of content in each decision including a summary of circumstances, steps taken to gather supporting documentation and detailed reasons behind both approval and denials. Intake Specialists participate in team calibration sessions to discuss specific cases, frequently encountered situations and mutual challenges in pursuit of jointly making adjustments that promote consistency.	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete
10	If decision-makers are to have any discretion to allow applications in	Intake Specialists do not have discretion to approve applications that do not meet the established criteria.	VP-Asset Management	July 1 st 2018	☐ Not yet started

	cases where the criteria are not met, the Rules of Procedure must state this, and set out how the decision-makers will exercise such discretion fairly.				☐ In progress ☒ Complete
11	The Rules of Procedure should clearly set out what (if any) recourse is available to tenants whose applications are denied.	The Rules of procedure describe the option for a tenant to request a procedural review within 20 days of the date at which they received a denial (93). The review is not an appeal of the decision, but rather, an assessment of the procedure for accuracy and fairness. The Review is not intended to allow for a re-hearing of the same application, or for an Intake Specialist to determine whether they would have decided differently. The Review is solely for a separate Intake Specialist to assess if there was a breach of procedural fairness.	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete
12	TCHC should consult with and draw on the experience of the City as it sets out to establish and administer an effective, efficient, transparent administrative decision-making body that is both procedurally and substantively fair. It could also look to the Society of Ontario Adjudicators and Regulators for resources to assist with this.	The City was consulted at multiple points during the engineering of the process including a concluding consultation on the finished rules of procedure. TCHC legal was tasked with drafting the rules given their expertise and experience with adjudication, best practice and related standards.	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete
13	TCHC should develop a system to quickly and effectively assess the housing needs of households that have qualified for Crisis priority transfers and to identify suitable alternative units to offer them.	Unit vacancies are centrally monitored by a specific department in TCHC with the ability to assist in identifying units that are vacant and ready for occupancy in real time.	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete

	Households with Crisis priority should have limited ability to refuse reasonable offers before losing their place on the waiting list. This is so that other households with circumstances warranting Crisis priority can also be fairly served.	Intake Specialists directly reference vacancy reports to match the tenant housing needs with immediately available units. They subsequently confirm unit readiness with local staff. Tenants are limited to being offered up to three housing options at once (depending on immediate availability). Toronto Community Housing will endeavor to offer three units, however, due to limitations of available units within the portfolio, there may have as few as one (or none) to offer. If a suitable unit(s) is offered and refused, the Tenant's application is dismissed. Tenants cannot re-apply for a Crisis transfer unless their situation has substantially changed from the original application.			
14	TCHC should explore ways of enhancing the new Crisis priority process by leveraging existing relationships that it has with the City, as well as with the Toronto Police Service, medical consultants and/or community organizations. TCHC should also explore developing new relationships of this type.	The extensive consultation conducted in pursuit of developing the process both introduced and renewed partner relationships with the City, Toronto Police Service, the Health Care sector and community support agencies that will endure as the process continues to operate. TCHC will update the Memorandum of Understanding (MOU) with TPS during 2019 to further strengthen information sharing based on experience to date. TCHC's 2019 Business Plan also includes a corporate objective to enhance relationships with existing partners and identify new collaboration opportunities that better address tenants' needs. These strategically valuable relationships will serve to	VP-Asset Management Senior Director – CSU Director – Tenant and Community Services	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete

		support the Tenants in crisis and the management of the transfer process generally.			
15	TCHC should clarify what information it requires from police services in Crisis priority transfer applications and in what form. In doing so, it should consider the restrictions that police sometimes put on the release of information.	<i>See Attachment TCHC_3_Police Form1.pdf</i> In partnership with Toronto Police Service, TCHC developed a standard form with which to transact the agreed upon details required to assess a transfer request. TCHC and Toronto Police Service collaborated on the level and quality of detail that TCHC would require and in which time frames. TCHC will update the Memorandum of Understanding (MOU) with Toronto Police Service during 2019 to further strengthen information sharing and efficiency.	VP-Asset Management General Counsel Senior Director – CSU	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete
16	TCHC should consider whether it will eliminate or keep the existing Medical and Safety at Risk priority transfer waiting list.	TCHC has developed a “choice-based” letting approach to facilitate a one-time matching exercise of tenants on the legacy waitlists with available vacant units. Households on the waiting lists will have the opportunity to express an interest in a unit from a pool of available vacant units published in December, 2018. Expressions of interest will be ranked in order of original approval dates and offers will be subsequently made to the highest ranking household. At the conclusion of the matching exercise, TCHC will eliminate the existing Medical and Safety at Risk priority transfer waiting list.	VP-Asset Management	March 31 st 2018	☐ Not yet started ☒ In progress ☐ Complete
17	Whatever TCHC decides to do with the existing Medical and Safety at	To date, the communication to Tenants has clearly outlined the option to immediately apply for a Crisis	VP-Asset Management	July 1 st 2018	☐ Not yet started

	Risk priority waiting list, it should notify every household on that list that they may apply for the new Crisis priority status if they believe they meet the qualifying criteria.	priority transfer, regardless of any status on an existing transfer waitlist. This communication has included direct mail, website broadcasting and printed posters in TCHC buildings.	Director – Strategic Communications		☐ In progress ☒ Complete
18	Even if TCHC decides to keep the existing Medical and Safety at Risk priority transfer waiting list, we recommend that it stop accepting new applications for Medical and Safety at Risk priority when the Crisis priority process comes into effect.	TCHC discontinued the acceptance of Medical and Safety at Risk transfer requests in June, 2018	VP-Asset Management		☐ Not yet started ☐ In progress ☒ Complete
19	TCHC should develop a communication plan with respect to all of the changes it plans to make to its priority transfer process. This plan should include, at minimum: plain language educational materials to inform tenants about the changes and how they will affect tenants; plain language educational materials to inform TCHC staff about the changes and their new responsibilities; and communication to the public about the changes, including through TCHC's website	TCHC has continuously communicated with Tenants throughout the development and implementation periods of the new process. • Direct mailed letters to all TCHC households and web content to explain the Ombudsman's report, TCHC's planned work to engineer the process and opportunities for Tenants to participate (prior to implementation) • Direct mailed letters to all TCHC households and web content to communicate the implementation of the Crisis priority. • Articles in the Fall 2018 edition of the Tenant Newsletter "Tenant Loop" advertising the application process and qualification criteria. • Printed content available in Operating Unit offices and on-line to explain the process. See attached links:	VP-Asset Management Director – Strategic Communications	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete

		https://www.torontohousing.ca/transferconsultations https://www.torontohousing.ca/news/newsletters/Documents/Tenant-Loop-fall-2018.pdf (Page 12) TCHC staff received training with job aid materials in advance of implementation. Material was subsequently reviewed with staff in remedial training sessions at the end of 2018.			
20	Once the Crisis priority process is in operation, TCHC should make no transfers outside the internal transfer process. Any exceptions should be approved by the CEO and documented.	TCHC's Internal Transfer Policy was update concurrent to the implementation of the Crisis priority transfer process. The policy expressly limits the approval of any transfers beyond the process to the CEO.	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete
21	The new Crisis priority is urgently needed. TCHC should develop a detailed implementation plan by the end of March 2018, providing that the Crisis priority process will be in place by the end of June 2018.	<i>See Attachment TCHC_4_Workplan-March2018.pdf</i> TCHC published a work plan to the Ombudsman on March 31 st , 2018 and subsequently implemented the Crisis priority transfer process on July 1 st , 2018 in accordance with all the recommendations.	VP-Asset Management	July 1 st 2018	☐ Not yet started ☐ In progress ☒ Complete