



REPORT FOR ACTION

2019 Third Quarter Status Report on Audit Recommendations: Opening Doors to Stable Housing

Date: November 20, 2019

To: Economic and Community Development Committee

From: General Manager, Shelter, Support and Housing Administration

Wards: All

SUMMARY

The Auditor General's report *Opening Doors to Stable Housing: An Effective Waiting List and Reduced Vacancy Rates Will Help More People Access Housing* was adopted by City Council on July 16, 2019, along with 34 recommendations for the Shelter, Support and Housing Administration (SSHA) division. As detailed in the Management Response, SSHA agreed with and is working towards achieving all of the recommendations.

At this meeting, City Council requested that SSHA report quarterly to City Council through the Economic and Community Development Committee, with information on service improvements and modernization initiatives made to the centralized waiting list, accuracy of waiting list data, an update on vacant units, the status of implementation of the new choice-based model, as well as progress made on the recommendations outlined by the Auditor General (Attachment A).

This report provides the information requested, in regards to the third quarter of 2019.

RECOMMENDATIONS

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

1. Economic and Community Development Committee receive this report for information.

FINANCIAL IMPACT

This report has no financial impact.

EQUITY IMPACT

Advancing the recommendations in the Auditor General's report on the centralized waiting list will improve services provided to people applying for subsidized housing. This includes people from equity-seeking groups such as seniors, people experiencing homelessness, women, people with disabilities, individuals with mental health issues, and other vulnerable groups.

Access to housing provides a foundation for improving social and economic outcomes. As such, working towards more timely access to subsidized housing will also support the City's poverty reduction efforts.

DECISION HISTORY

On October 16, 2019, the Economic and Community Development Committee adopted the report *2019 Second Quarter Status Report on Audit Recommendations: Opening Doors to Stable Housing*, which responded to City Council's request that SSHA report quarterly on specified updates relating to the administration of the centralized waiting list. This was the first of SSHA's quarterly reports for this request and covered the second quarter of 2019.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.EC8.14>

On September 18, 2019, Bid Award Panel reviewed and adopted BA44.9, *Award of Vendor of Record (VOR) Arrangement No. 17290 to Yardi Canada Ltd. for Integrated Housing Management System*, to procure a choice-based housing access I&T system.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.BA44.9>

City Council, on July 16, 2019 adopted the report AU3.14 from the Auditor General, *Opening Doors to Stable Housing: An Effective Waiting List and Reduced Vacancy Rates Will Help More People Access Housing*, which included a series of recommendations with respect to the centralized waiting list for social housing administered by the City of Toronto.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.AU3.14>

COMMENTS

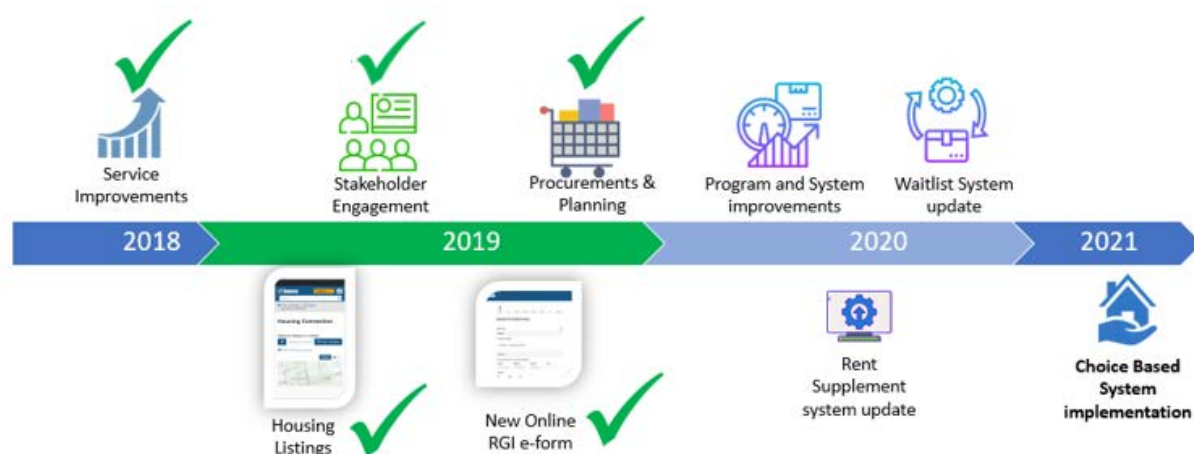
SSHA is working towards achieving of all recommendations made in the Auditor General's report, *Opening Doors to Stable Housing*, and is on target to meet all recommendations that have a 2019 completion date. A status update on each recommendation is included in Attachment A.

Outlined below are highlights of actions taken to date, early achievements, and requested centralized waiting list data and other related information.

New Choice Based Housing Access Model - Implementation Updates

SSHA is working with Corporate I&T to implement a new choice based housing access model that will modernize the centralized waiting list system and improve access to information on available housing options, empowering applicants to make more informed choices that meet their individual housing needs.

Implementation of the new choice based model involved the procurement of a new centralized waiting list software system, enhanced online tools that will make it easier for applicants to manage and update their applications, new business and performance monitoring processes, and enhanced housing provider training.



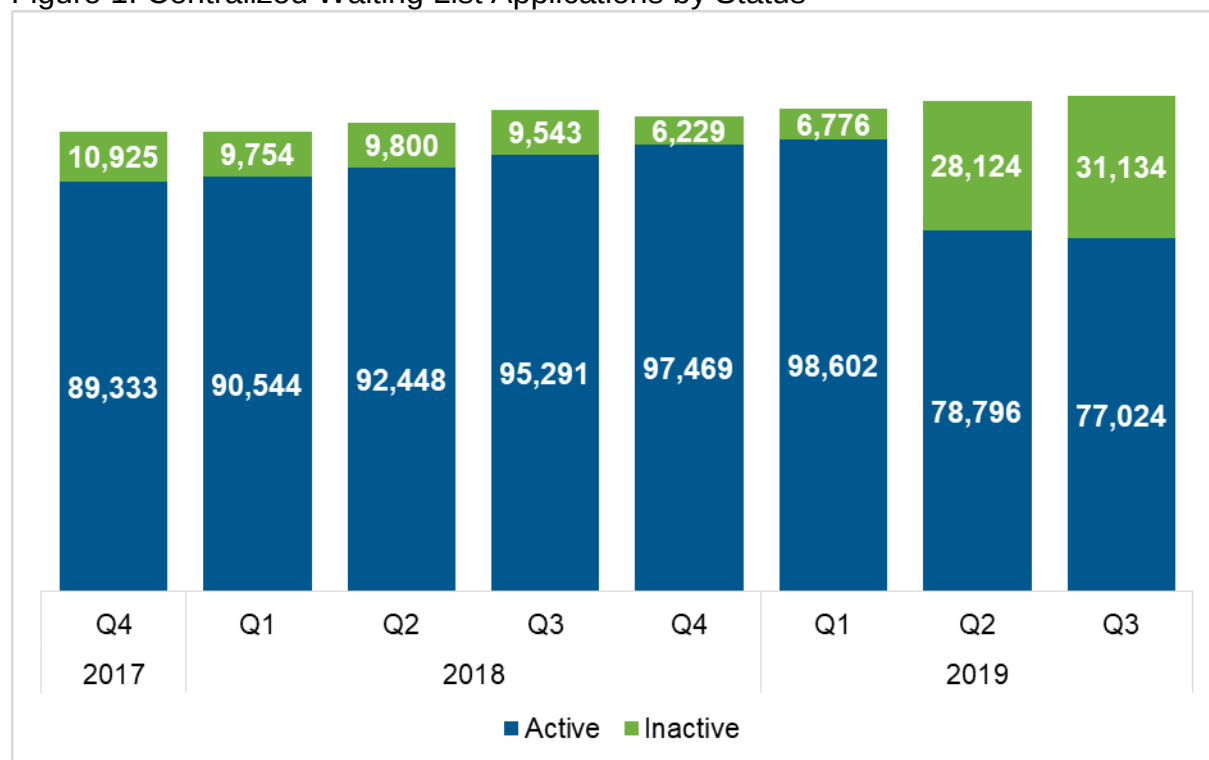
Key advancements:

- The Vendor Contract with Yardi Canada Ltd. is now in place, which allows staff to meet with the vendor and advance project planning.
- A kick-off meeting with the Vendor Project Team and City of Toronto Project Team was held on November 6, 2019.
- An Integrated Project Plan is being reviewed and finalized.

Households on the Centralized Waiting List

SSHA continues to improve the accuracy of the centralized waiting list. This is both to ensure client information is up-to-date and help providers fill vacancies faster.

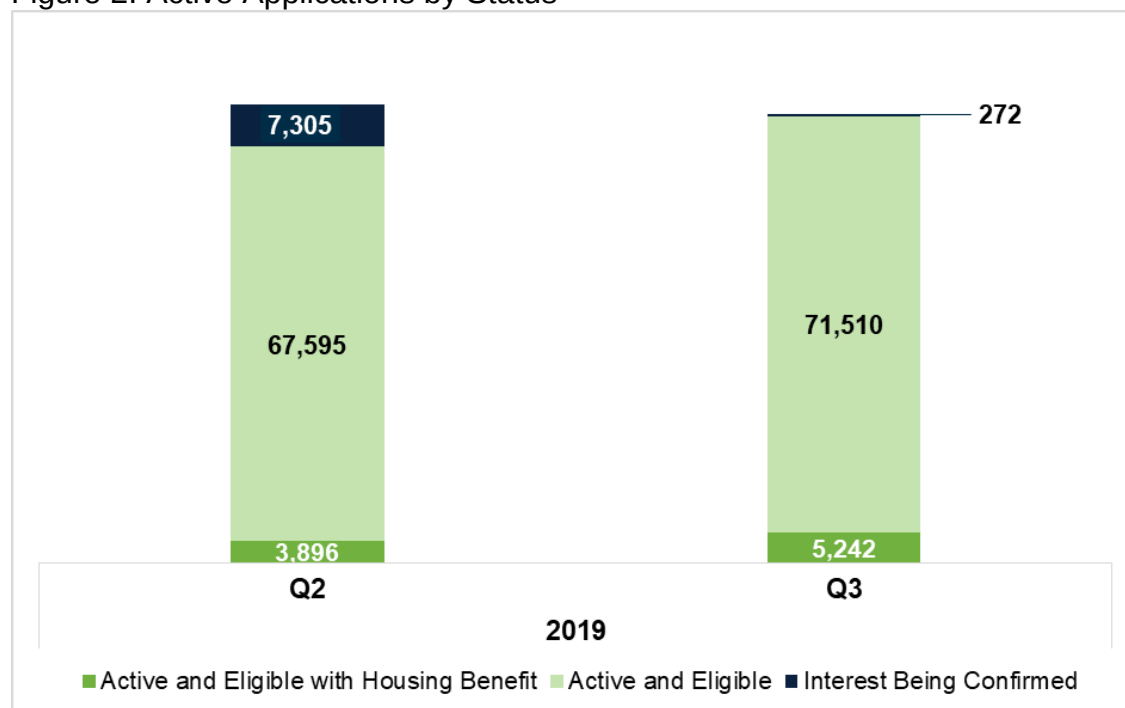
Figure 1: Centralized Waiting List Applications by Status



In Q3, SSHA used its Automated Outbound Calling tool to contact over 7,400 applicants who had not made contact with the City for over 18 months. This resulted in 4,125 applicants being placed in inactive status and given 18 months to make contact to reinstate their application.

Other activity that has contributed to the decline of the active centralized waiting list in Q3 includes 767 households being housed and 2,692 applications being cancelled. Applications are cancelled primarily when the applicant does not respond to the City's attempts at contact or does not provide the City with requested information. After accounting for new applications, the active applications on the centralized waiting list had an overall decrease of 1,772 in Q3, as shown in figure 1.

Figure 2: Active Applications by Status



Of the 77,024 active applications on the centralized waiting list at the end of Q3, 93% are considered active and eligible households. The remaining 7% are not new applicants but rather households who are already receiving a housing benefit, including:

- Households receiving RGI who are seeking to move to a new RGI unit through the centralized waiting list;
- Housing Allowance recipients receiving a temporary benefit who have long-term affordability issues; and
- Over-housed households who are required to go back on the centralized waiting list to secure an appropriately sized unit.

As recommended by the Auditor General, SSHA is currently reviewing the centralized waiting list to develop meaningful categories to support the effective management and reporting of the number of active and eligible applicants, with an expected completion date of Q1 2020.

Key advancements:

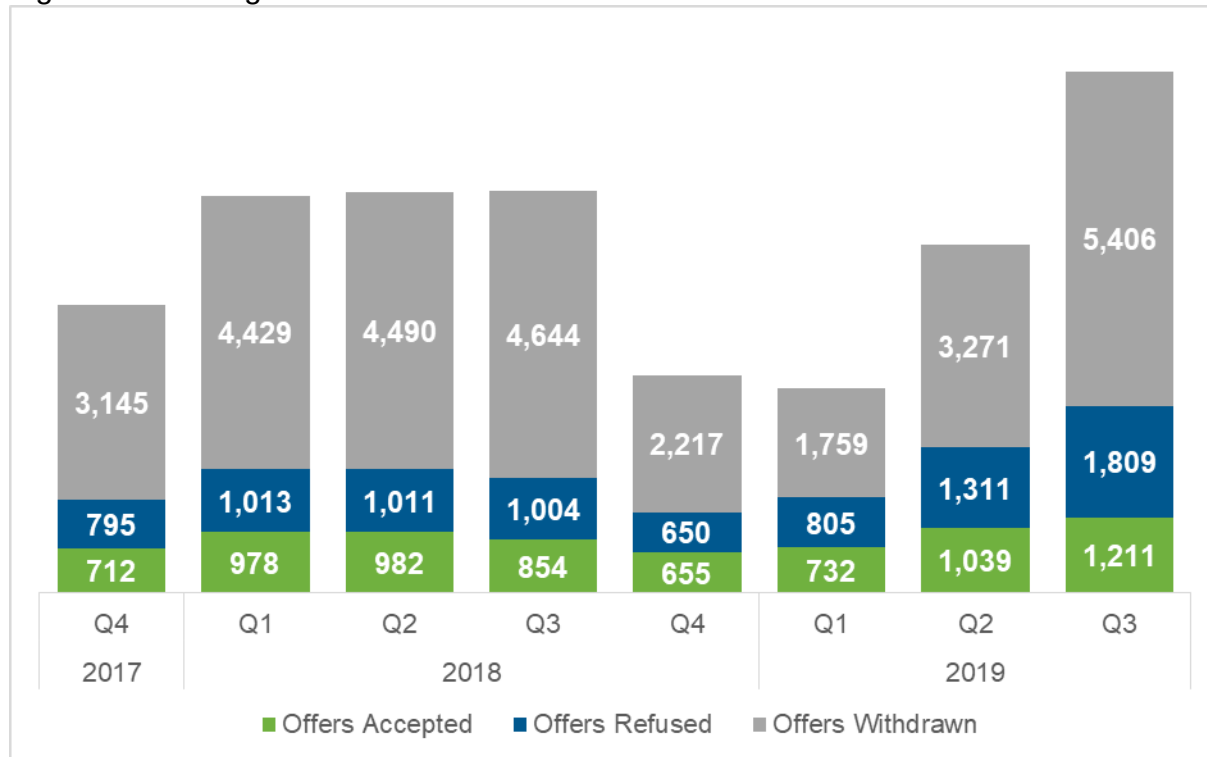
- Over 7,400 households were contacted in Q3, resulting in over 4,000 applications being inactivated.
- The number of active households who have not made contact with the City in over two years has been reduced by more than 7,000, going from 7,305 households in Q2 to 272 in Q3.
- There were 77,024 active households (142,900 individuals) on the centralized waiting list at the end of Q3. This represents a decrease of 1,772 households (3,166 individuals) since Q2 2019.

Housing Offers

SSHA is working with providers to fill vacancies more expediently by reducing the number of offers it takes a housing provider to fill a vacancy.

In Q3, there were 8,694 total offers made, an increase of 48% over Q2, with an acceptance rate of 14%, refusal rate of 21%, and withdrawal rate of 62%.

Figure 3: Housing Offers



Consistent with the increase in total offers made, in Q3 there was 1,109 attempted offers to applicants that could not be reached, up from 653 in Q2; and 501 attempted offers to applicants who had up-to-date contact information but did not respond, down from 552 in Q2. Housing providers are putting these applications on hold while the City follows up with applicants. The average number of offers required to fill a vacancy also increased from 4.8 in Q2, to 5.7 in Q3.

Staff are working to support housing providers to more effectively and efficiently manage their offer processes, to reduce the amount of time and number of offers it takes to fill each vacancy. This includes increasing and improving communication with applicants to improve the accuracy of contact information and housing preferences; as well as revamping the City's Waiting List Management training for housing providers to reinforce waiting list rules and processes. Staff have also been meeting with Toronto Community Housing Corporation (TCHC) management and frontline staff to review offers made and identify strategies to reduce the number of offers that are withdrawn.

In addition to vacant units being offered to applicants on the centralized waiting list, there were nine vacancies filled through referral agreements and 29 vacancies filled through converting market rent households to RGI in Q3 2019.

Key advancements:

- The City's updated Waiting List Management training was launched on October 1, and included improved and updated information on waiting list rules and processes.
- Staff are working with TCHC to ensure that rentable vacant units are promptly posted to the centralized waiting list. These efforts have resulted in a 15% increase in TCHC units listed on the centralized waiting list since mid-August.

Toronto Community Housing Corporation Vacancies

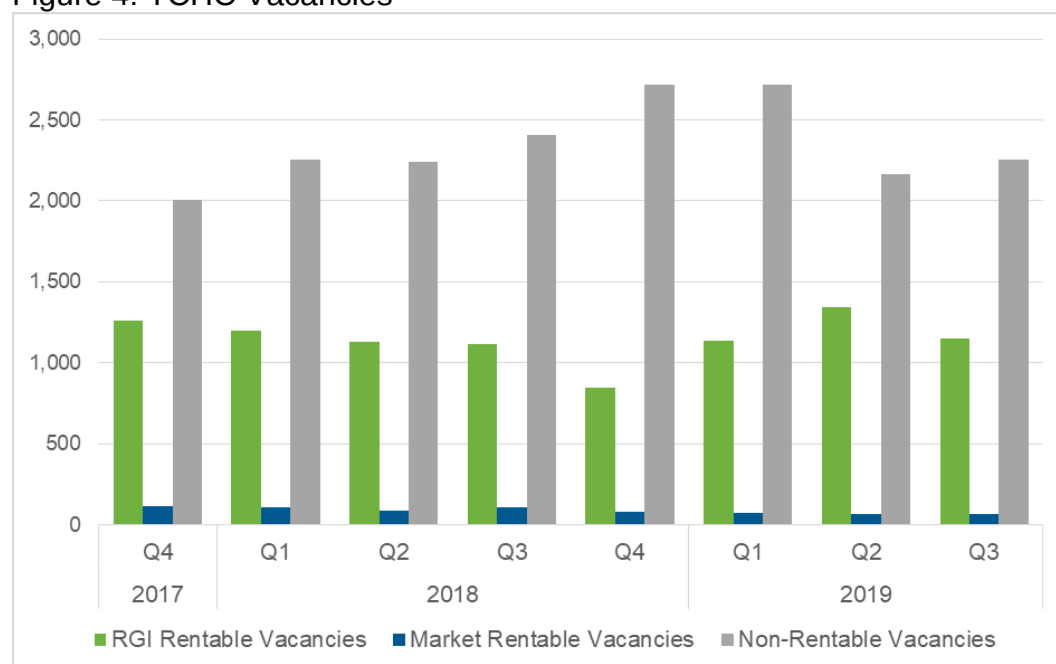
In its capacity as service manager, the City continues to support TCHC's strategies to better manage vacancies and has increased monitoring of TCHC vacancies and offers. TCHC has provided City staff with the following data in response to City Council's request for detailed reporting on vacancies and vacancy management.

TCHC Vacancy Rates

TCHC had a total of 3,451 vacant units at Q3, down from 3,574 in Q2. This includes vacant units that are rentable and units that are non-rentable due to impacting factors such as revitalization projects, capital repairs, and pending sales or transfers to other operators.

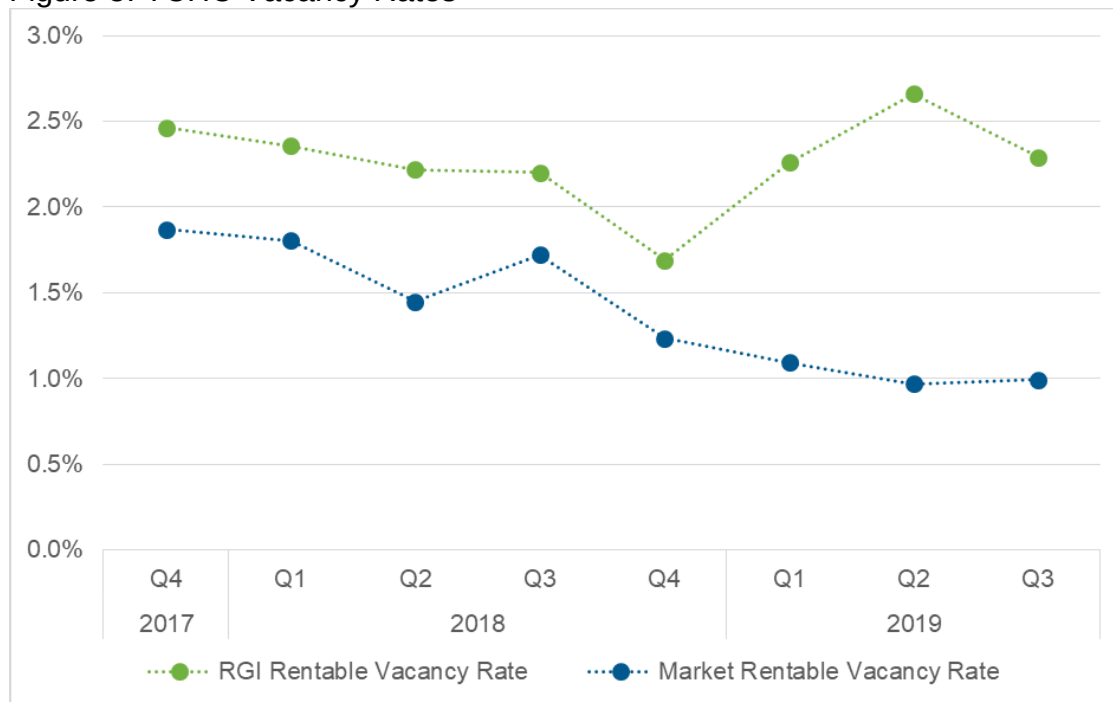
In Q3, TCHC made progress in reducing their *rentable* RGI vacancies from 1,343 units to 1,153, a decrease of 190 units. However, there was an increase of 87 vacant *non-rentable* units, rising from 2,168 in Q2 to 2,255 in Q3.

Figure 4: TCHC Vacancies



While there was a slight rise in the vacancy rate of rentable market units from 0.97% to 0.99%, the vacancy rate for rentable RGI units has decreased from 2.66% in Q2 to 2.29% in Q3.

Figure 5: TCHC Vacancy Rates



Key advancements:

- New staff have been hired to increase the volume of offers being made. This has contributed to the decrease in vacant RGI units.
- The offer process for overhoused applicants was updated to require the selection of four geographic areas rather than specific addresses. This is expected to expedite the time it takes for an overhoused household to be transferred to a smaller unit, so larger units can be vacated more quickly for families on the centralized waiting list.
- With the consent of the City, TCHC by-passed the Overhoused Priority rules for 60 days commencing in August to allow time for over-housed tenants to update their transfer preferences to a geographic area, and to expedite offers to applicants on the centralized waiting list.

TCHC Aged Vacancy Data

A rentable unit typically remains vacant for 30 days during the process of unit turnover. Two key reasons that a rentable unit remains vacant for more than 90 days is that it is being held for relocation or for capital repairs.

In Q3, TCHC has shown progress in reducing how long their rentable units remain vacant before unit turnover. As seen in Figure 6, the number of rentable units filled by a new household within 30 days has increased from 68 units in Q2, to 232 units in Q3, while the number of units that took more than 30 days to fill has decreased from 1,326 in Q2 to 986 in Q3.

Figure 6: Duration of Vacancies for Rentable Units in Q2 and Q3

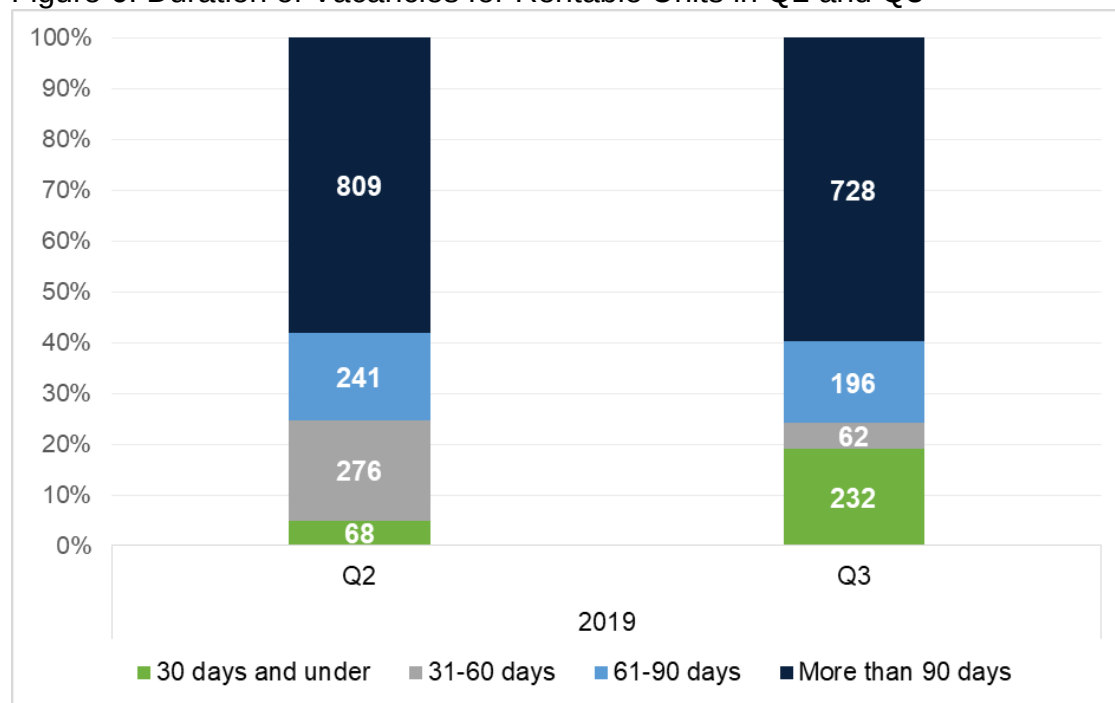
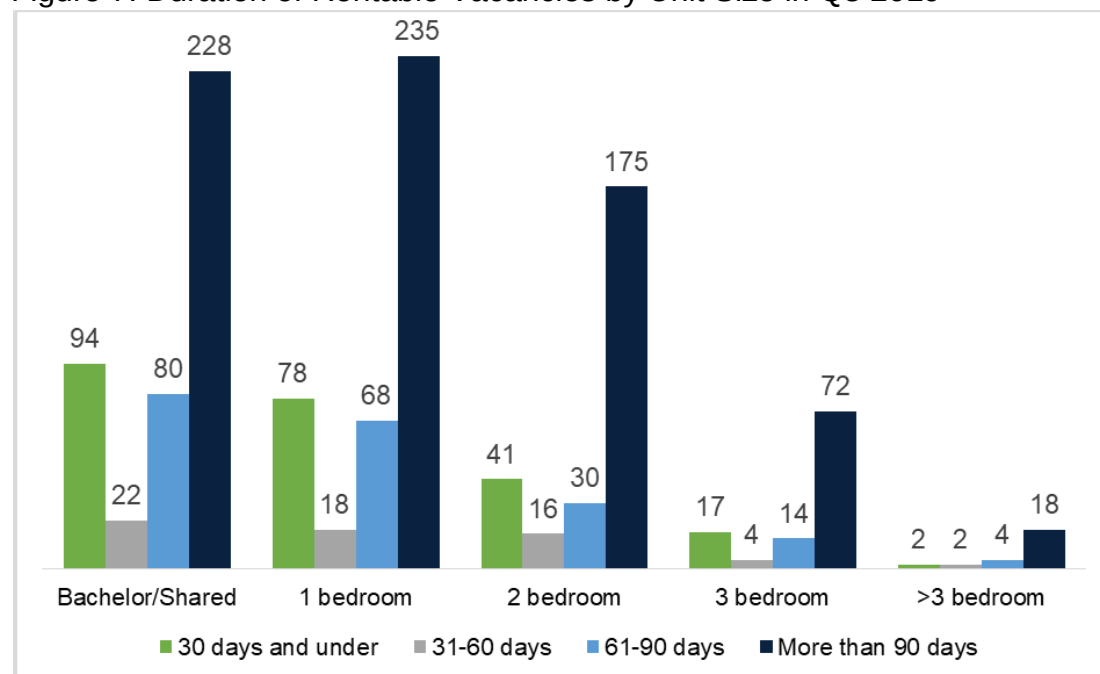


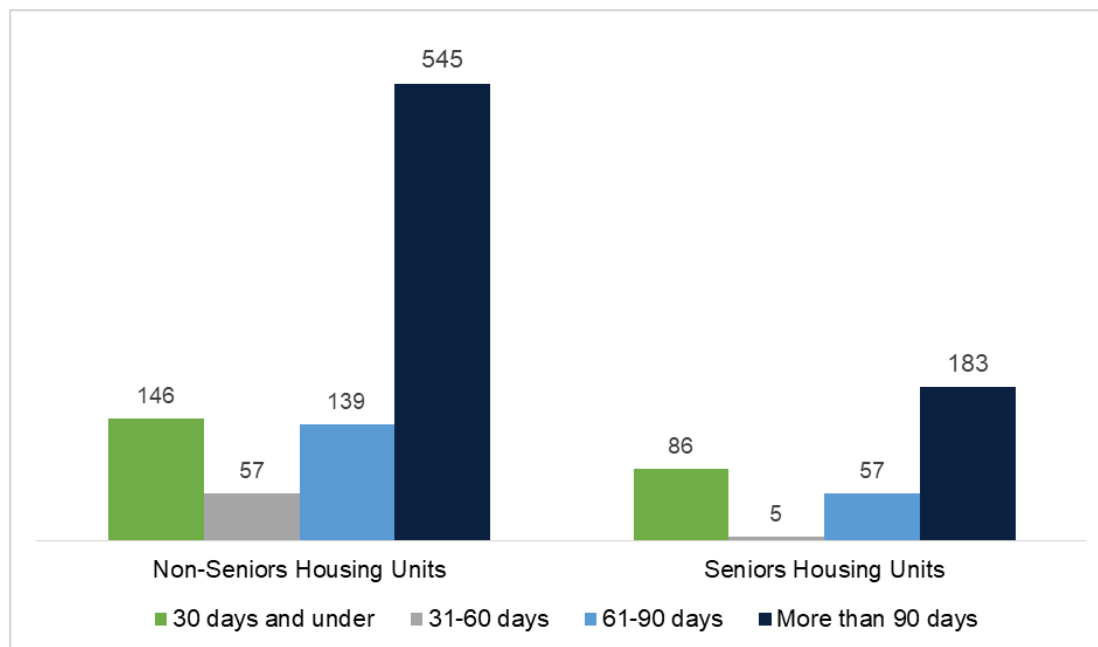
Figure 6 also shows a decrease in units that remained vacant for over 90 days, from 809 units in Q2 to 728 units in Q3. Of this overall decline, bachelor/shared units and units with over three bedrooms saw a decrease in the percentage of rentable units vacant for more than 90 days; where the percentage for bachelor/shared units decreased from 58% to 54% and the percentage for units with over three bedrooms decreased from 74% to 69%.

Figure 7: Duration of Rentable Vacancies by Unit Size in Q3 2019



Vacancies last longer in the non-senior or family portfolio than in units designated for seniors. This is partly because townhouses and larger apartment units have greater capital requirements. In addition, non-senior units are held more often for relocation purposes during revitalization projects, as more households qualify for non-senior units.

Figure 8: Duration of Rentable Vacancies by Mandate in Q3 2019



Key advancements:

- To ensure that units being offered meet the housing needs of an applicant, TCHC has been working with the City to ensure applicant information on the waiting list is up-to-date and enhance public information on vacant units.
- TCHC is actively working with the City to identify a shared index for identifying hard-to-rent units and begin assessing reporting changes that may be required.
- TCHC has increased the number of units filled within 30 days from 68 in Q2, to 232 units in Q3.
- The percentage of rentable bachelor/shared units vacant for over 90 days has decreased from 58% of units in Q2, to 54% in Q3.

TCHC Non-Rentable Vacancies

Within the TCHC portfolio, more than half of current vacancies are considered non-rentable for the reasons outlined below.

Table 1: Reasons for Non-Rentable Vacancies

Reason	Description	Q2 2019	Q3 2019	Net + / (-)
Revitalization Projects	Units associated with revitalization activities	1,186	1,332	146
Sale or Transfer of Building	Units pending sale or transfer to another operator	383	393	10
Uninhabitable/ Repairs	Units requiring capital investment	288	307	19
Operations	Units being used for operational activities where no alternative is available (i.e. office or amenity space)	197	190	(7)
Accessibility	Units associated with capital work related to accessibility	28	33	5
Units being held for transfers due to medical and safety risks	Time limited initiative associated with changes to the transfer process	86	0	(86)
Total		2,168	2,255	87

As detailed in Table 1 above, more than one third of vacancies were non-rentable because of revitalization projects, where units are being held for displaced tenants or are under redevelopment. These projects often have legislated and/or policy requirements that prescribe how tenants are relocated and returned to revitalized units.

Further, the increase in non-rentable vacancies in Q3 is largely due to the launch of the next phase of the Regent Park Revitalization, where units are being held for tenant relocation.

The second most common reason that a unit is non-rentable is due to units being considered for sale or being transferred to an agency. This is partly due to Request for Proposals being issued through the accelerated Tenants First Phase One implementation plan approved by City Council on April 16, 2019, which involves the transfer of TCHC units to qualified non-profit housing providers, co-ops, and community land trusts.

Outside of these two key areas, units are also held for operational purposes such as Superintendent offices, storage for capital work, or community programming where no common amenity space is available.

Key advancements:

- TCHC has established, as a guiding principle, that current and future vacant units will only be used for a contractor's office or storage in circumstances where a container cannot be effectively positioned on the site.
- TCHC has undertaken a review of the units held for local staff use and/or storage to assess and identify alternative solutions.

Prioritization of Applicants

Generally, the City's centralized waiting list for subsidized housing is managed on a first-come first-served basis, where applicants receive an offer of housing based on the date of their application. Recognizing that some households are in greater need of housing, there are four priority groups that receive fast-tracked access when RGI units become available: survivors of abuse and human trafficking, terminally ill applicants, overhoused households, and disadvantaged households.

People experiencing homelessness may apply to obtain priority access as part of the disadvantaged priority group. The Auditor General's report found that there are people experiencing homelessness and have a shelter listed as the address on their application, that have not been assigned priority status on the centralized waiting list.

Staff continue to work towards ensuring applicants that qualify as a priority group are granted the appropriate priority status. This includes supporting opportunities for shelter clients to be placed on the centralized waiting list and assigned the disadvantaged status, as well as conducting regular reviews of the centralized waiting list to flag applicants with shelters listed as their address.

At the end of Q3, there were 3,471 eligible applicants listing a shelter as their address on their application, of which 40% had been assigned a disadvantaged priority status. Staff will be using this information to update applicants to disadvantaged status where applicable.

Key advancements:

- In October, City-funded shelters were directed to ensure that all shelter clients are provided an opportunity to be placed on the centralized waiting list and assigned the disadvantaged status.
- In the first three quarters of 2019, there were 383 applicants housed from the centralized waiting list that had priority status relating to homelessness.
- At the end of Q3, 2,031 eligible households on the centralized waiting list had been assigned a disadvantage priority status due to homelessness.

Conclusion

SSHA supports the findings of the Auditor General's report on the centralized waiting list and views its recommendations as affirming SSHA's current direction. All recommendations with a 2019 completion date have been actioned and are on target for completion.

This report has highlighted SSHA's decisive actions and early achievements in addressing the key issues identified in the Auditor General's report, including reducing the active centralized waiting list and the number of rentable RGI vacancies. Staff will continue to work towards the advancement of all recommendations, as outlined in Attachment A.

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ATTACHMENTS

Attachment A: Progress Chart on the Implementation of the Auditor General's Recommendations

Attachment A: Progress Chart on the Implementation of the Auditor General's Recommendations

Rec #	Recommendation	Key Actions	Completion Date
Theme 1: Helping people get access to RGI Assistance			
1	Design and implement procedures to ensure compliance with the legislated requirement to review eligibility of applicants on the centralized waiting list for RGI at least once every 24 months after they have been added to the list. Such procedures to ensure:	<i>Management Response:</i> Management agrees with this recommendation. SSHA currently reminds clients to maintain annual contact with SSHA and tracks contact, and attempts at contact, in the existing database. Management will also review opportunities to improve current processes through the development of the new waiting list management system, allowing for automated reminders to be sent and for improved data quality and tracking. Implementation of this function is expected to take place in Q4 2020.	Q4 2019
	a. applicants are advised of the need to maintain contact with the Access to Housing business unit at least once in every 24-month period to ensure their information is kept up-to-date and to re-affirm continued eligibility for rent-geared-to-income assistance	<i>Key actions:</i> Between January and November, SSHA has contacted over 34,000 applicants with no recent contact. Through this process more than 28,000 applications were made inactive. There are currently 272 households on the wait list have not been in touch for more than 24 months.	Q4 2020
	b. all attempts to contact each applicant are sufficiently tracked so that Access to Housing can identify all applications that should be changed to inactive status and subsequently cancelled		Q4 2019
	c. action is taken to make applications inactive and to cancel applications, if there is no response to outreach attempts by City staff in accordance with policies and procedures		

Rec #	Recommendation	Key Actions	Completion Date
2	Review the applicants on the centralized waiting list for rent-geared-to-income and develop meaningful categories to support the effective management, including accurate reporting of the number of active and eligible applicants.	<i>Management response:</i> Management agrees with this recommendation. SSHA will analyze client profile data to enhance communication and reporting on the different household types and status of applicants on the centralized waiting list starting in Q1 2020. <i>Key actions:</i> • A review of key centralized waiting list information reported through Open Data, Progress Portal and the SSHA website has been completed. • Meaningful categories and a standardized reporting approach is being developed for implementation in Q1 2020.	Q1 2020
3	a. Develop clear guidelines for housing providers on the circumstances under which an offer for rent-geared-to-income housing can be withdrawn and not be considered a refusal. Such guidelines to also clearly indicate how to record the reasons for withdrawals or refusals in the centralized waiting list information system. b. Implement monitoring procedures to ensure housing providers are not recording refusals of offers as withdrawals such that households can circumvent the Housing Services Act's limit on the number of refusals allowed before the applicant is removed from the centralized waiting list.	<i>Management response:</i> Management agrees with this recommendation. SSHA will conduct a review of the existing guidelines and training for housing providers and facilitate changes to the RGI administration manual to ensure clear direction on how to record offers made to applicants. Improved guidelines will outline both the categorization and the recording of information on refusals and withdrawals in Q4 2019. Management will also review the current process to monitor offers made by providers and identify opportunities for improvement through planned changes to SSHA's new waiting list management system in Q4 2020.	✓ Completed Q4 2019
			Q4 2020

Rec #	Recommendation	Key Actions	Completion Date
		<i>Key actions:</i> New Waiting List Management training for housing providers was introduced on October 1, 2019. New content reinforces policies and procedures for providers and applicants, including clarifying the difference between offer refusals and offer withdrawals.	
4	Recommend to the Ministry of Municipal Affairs and Housing to consider revising the Housing Services Act, 2011 to be aligned with the Long Term Care Homes Act regarding refusals of pre-selected housing choices and to only accommodate refusals under clearly defined set of exceptional circumstances.	<i>Management response:</i> Management agrees with this recommendation. SSHA supports new proposed flexibility emerging out of the Ministry of Municipal Affairs and Housing consultations on the current three refusal rule, and will review current policy based on consultation outcomes anticipated by Q2 2020. <i>Key actions:</i> SSHA recommended changes to the Province. Regulatory changes to the Housing Services Act were announced in September 2019 that support this recommendation and require Service Managers to transition to one refusal no later than January 1, 2021.	 Completed Q3 2019
5	Ensure that applicants understand the importance of choosing only those buildings they are willing to move into and the consequences of such choices.	<i>Management response:</i> Management agrees with this recommendation. SSHA will review and revise current communications with households by the end of Q4 2019. Communication will be revised based on program changes made as part of the roll-out and ongoing management of the choice-based	Q4 2019

Rec #	Recommendation	Key Actions	Completion Date
		system. Outreach to clients is an important part of the implementation of the system to ensure their understanding and participation as users. Planned changes to SSHA's new waiting list management system will be leveraged to allow clients to access this information more readily. <i>Key actions:</i> • Review and revise current communication with households by the end of Q4 2019. Communication will be ongoing to support legislative changes introduced by MMAH, as well as program changes to be made related to new legislation and as part of the roll-out and ongoing management of the choice-based system.	
6	Increase information about available units to enable applicants to make better informed choices about buildings they are willing to move into.	<i>Management response:</i> Management agrees with this recommendation. SSHA will communicate with households as part of the roll-out and ongoing management of the choice-based system. Outreach to clients is an important part of the implementation of the system to ensure their understanding and participation as users. Planned changes to SSHA's new waiting list management system will be leveraged to allow clients to access this information more readily. New information will be available to applicants in Q3 2019 and will continue to be reviewed and revised based on feedback from applicants and other stakeholders.	 Completed Q3 2019

Rec #	Recommendation	Key Actions	Completion Date
		<i>Key actions:</i> Map-based housing listings were introduced to applicants and key stakeholders in September 2019.	
7	Ensure applicants are required to identify: a. the preferred method(s) of contact that will result in a 48-hour response such as phone, email, or mobile messaging b. an alternate contact person or support organization in Canada designated to respond on their behalf, if necessary.	<i>Management response:</i> Management agrees with this recommendation. Having accurate contact preferences of households is integral to the efficient management of the centralized waiting list. Planned changes to SSHA's new waiting list management system, expected in Q4 2020, will further enhance the setting and updating of communication preferences. <i>Key actions:</i> This has been identified as a requirement for the new choice-based system being implemented in 2020.	Q4 2020
8	Review additional steps to cost-effectively enhance communication with applicants, including reminders to keep their application information accurate and up-to-date.	<i>Management response:</i> Management agrees with this recommendation. SSHA will review additional steps by the end of Q1 2020, including opportunities to enhance communications through planned changes to SSHA's new waiting list management systems including enabling automated reminders. The new choice-based model is designed to engage applicants to play a more active role, including logging into the online system regularly to review listings and having correspondence to applicants shared via self-service portals.	Q1 2020

Rec #	Recommendation	Key Actions	Completion Date
		<i>Key actions:</i> This has been identified as a requirement for the new choice-based system being implemented in 2020.	
9	Review and implement technology-based communication methods that allow the Division to more efficiently and cost-effectively: a. serve notice of decisions related to household applications. b. make contact with applicants to confirm their ongoing interest, update their address, phone number, income, housing preferences, and other information.	<i>Management response:</i> Management agrees with this recommendation. SSHA will review additional steps by the end of Q1 2020, including opportunities to enhance communications through planned changes to SSHA's new waiting list management systems including enabling automated reminders. The new choice-based model is designed to engage applicants to play a more active role, including logging into the online system regularly to review listings and having correspondence to applicants shared via self-service portals. <i>Key actions:</i> This has been identified as a requirement for the new choice-based system being implemented in 2020.	Q1 2020
27	In consultation with the City's Chief Information Officer, ensure: a. that progress is made to select a vendor and develop an implementation plan for the new choice-based system for selecting households b. the new technology includes appropriate system access controls, input and validation controls to prevent data entry errors c. exception monitoring controls are developed, including regular reports to support the detection of errors or irregular activity.	<i>Management response:</i> Management agrees with this recommendation. Management will continue working closely with Corporate I&T and the City's Chief Information Officer to develop the requirements for SSHA's new waiting list management system. System Access Controls and other best practices will be adopted to support business practices for implementation in Q4 2020.	Q4 2020

Rec #	Recommendation	Key Actions	Completion Date
		<i>Key actions:</i> SSHA and Corporate I&T partnered in the procurement of SSHA's new waiting list management system. Contract with the vendor has been signed and work with vendor has been initiated.	
Theme 2: Reviewing Priorities for RGI Assistance			
10	a. Review the City's local priority rules for selecting households from the waiting list for rent-geared-to-income and recommend to City Council any additional priority rules that should be adopted to support selection of households based on an applicant's level of need; and b. where additional priority rules are established, ensure the waiting list information system supports selection based on these priorities; and, if necessary, develop a process to perform an objective assessment of each applicant's need for RGI assistance in order to determine their priority on the CWL.	<i>Management response:</i> Management agrees with this recommendation. SSHA recognizes the housing context in the City of Toronto has changed since 2002. A review of local priorities related to housing benefits and access to subsidized housing would be beneficial in ensuring the City is responding to current housing needs. Consultations are anticipated to begin in 2020 with implementation in 2021. <i>Key actions:</i> To be initiated in 2020.	Q4 2021
11	Establish local rules for: a. asset limits for rent-geared-to-income recipients b. total household income limits and prioritize access to rent-geared-to-income assistance based on household income.	<i>Management response:</i> Management agrees with this recommendation. SSHA will support the establishment of an Asset Limit emerging out of Ministry of Municipal Affairs and Housing consultations on legislative changes. SSHA is concurrently reviewing local rules for income and assets and, based on findings and consultation outcomes, will bring forward recommendations to Council for their consideration by the end of Q2 2020.	Q2 2020

Rec #	Recommendation	Key Actions	Completion Date
		<i>Key actions:</i> SSHA has initiated a jurisdictional scan and is on track to inform recommendations to Council for Local Rules by the end of Q2 2020.	
12	In consultation with the City's Medical Officer of Health, review the types of housing preferences or restrictions for preferred RGI housing units to assess if there is a bona fide need to accommodate and develop local rules to manage such requests.	<i>Management response:</i> Management agrees with this recommendation. Planned changes to SSHA's new waiting list management system and the introduction of the choice-based program will support the implementation of this recommendation. SSHA will consult with the City's Medical Officer of Health in Q4 of 2019 to review and revise the approach to accommodations with any changes phased in by the end of 2020. <i>Key actions:</i> To be initiated in Q4 2019	Q4 2020
13	Consider establishing local rules prioritizing access to rent-geared-to-income assistance for those households that currently do not receive rent-geared-to-income assistance or reside in social housing.	<i>Management response:</i> Management agrees with this recommendations. SSHA will assess and report on the impact of distinguishing between recipients and non-recipients of RGI assistance when, as directed by the Auditor General's recommendation 10, SSHA reports back to council on consideration of local priority rules in 2021. <i>Key actions:</i> To be initiated in 2020.	Q4 2021

Rec #	Recommendation	Key Actions	Completion Date
14	Ensure greater integration of services and supports is provided for vulnerable clients in the shelter system as they transition from homelessness to stable housing including confirming that those experiencing homelessness receive appropriate priority status.	<i>Management response:</i> Management agrees with this recommendation. SSHA will continue to build on the Coordinated Access to Housing system, funded in part by the provincial Home for Good and the federal Reaching Home programs. The system provides enhanced integration of housing and homelessness services including access to housing allowances and rent-geared-to-income support for people transitioning to housing from emergency shelter and street outreach programs and is coordinated through the use of a single point of referral. <i>Key actions:</i> • Shelter clients who were on the waiting list were identified in Q3 2019 and, where required, a priority was added to the application. • A review of SSHA's processes related to supporting vulnerable clients in the shelter system to secure RGI through the centralized waiting list, will be conducted in Q4 2019.	Q4 2019

Rec #	Recommendation	Key Actions	Completion Date
Theme 3: Opening doors for more people to access RGI housing			
15	Review and, if appropriate, report to City Council through the Planning and Housing Committee on how the City can meet the mandated RGI assistance service level prescribed in the Housing Service Act, 2011. This review should consider how portable housing benefits can be used where vacancies in the physical social housing stock are limited, and determine how much funding would be needed as well as the source of such funds in order to come into compliance.	<i>Management response:</i> Management agrees with this recommendation. SSHA has contacted housing providers to identify proposed actions to increase the number of units occupied by RGI households. Formal direction will be issued by the end of Q4 2019. As part of this review, SSHA will explore how portable housing benefits can be useful and report back as appropriate. <i>Key actions:</i> • City Guideline 2019-6 was issued on August 1, 2019, mandating an increase in the minimum number of rent geared-to-income households housed by all mixed-income provincial program housing providers. • SSHA is working in partnership with TCHC to develop an Action Plan to increase the number of RGI units within the portfolio, in order to achieve prescribed service levels. • The feasibility of using housing benefits to fill vacancies and meet RGI service levels, will be reviewed by Q2 2020.	Q4 2019

Rec #	Recommendation	Key Actions	Completion Date
16	In collaboration with TCHC, ensure that a maximum number of social housing units are being used for housing and to complete a review of all housing units that are used for other purposes; and, establish a process that requires service manager approval prior to the removal of any housing units from service.	<i>Management response:</i> Management agrees with this recommendation. The City is engaged with TCHC on the development of an action plan related to RGI service level standards and the status of vacant units. <i>Key actions:</i> The plan and supporting processes will be in place in Q1 2020.	Q1 2020
17	a. Work, in collaboration with the Chief Executive Officer, TCHC, to develop an interim process to efficiently and publicly post information on buildings with hard-to-rent vacancies to support applicants in making more informed housing choices. b. leverage any existing solutions with City and agency partners to provide support for applicants to access the internet at various city sites such as, emergency shelters, social services offices, local libraries, and community centres.	<i>Management response:</i> Management agrees with this recommendation. SSHA will work with TCHC to target vacant hard-to-rent units and develop a process to post this information publicly. This interim process will be used in 2019/2020 while SSHA continues to work on implementation of its planned changes to the new waiting list management system, expected for 2021. To ensure alignment with existing City corporate initiatives, SSHA will work with City partners, including Corporate Information & Technology Division, to leverage existing programs and strategies to increase public internet access for online information on City services for residents. <i>Key actions:</i> This has been identified as a business requirement and will be incorporated in SSHA's new waiting list management system, to be implemented in 2020.	Q4 2021

Rec #	Recommendation	Key Actions	Completion Date
18	Review and revise the local rules in order to effectively re-house over-housed RGI tenants into a suitable housing unit. In conducting the review, the Division consider: a. evidence available on the number of preferences that will support efficient and timely re-housing of an over-housed household including benchmarking with other jurisdictions b. implications of imposing an over-housed surcharge on households who refuse to be re-housed in a timely manner.	<i>Management response:</i> Management agrees with this recommendation. SSHA will review the local rules and the feasibility of adding surcharges by the end of Q2 2020 for over-housed RGI tenants to support their timely transfer to suitable units. <i>Key actions:</i> • Work will begin on this issue in Q4 2019.	Q2 2020
19	Develop system controls to automatically determine the maximum number of bedrooms a RGI applicant is eligible for based on household composition and the City's occupancy standards.	<i>Management response:</i> Management agrees with this recommendation. Planned changes to SSHA's new waiting list management system will address this requirement. The system will identify unit size for applicants and track where exceptions are authorized based on City rules by the end of Q4 2020. <i>Key actions:</i> • This has been identified as a business requirement for SSHA's new waiting list management system, to be implemented in 2020.	Q4 2020

Rec #	Recommendation	Key Actions	Completion Date
20	In consultation with the City's Medical Officer of Health, to: a. identify the medical circumstances that would warrant a RGI household to have more bedrooms than specified in the local occupancy standards and update local rules accordingly b. develop and implement a process to review and approve requests for an additional bedroom to accommodate medical conditions, including documentation that should be obtained to support such requests, based on criteria to be included in local rules.	<i>Management response:</i> Management agrees with this recommendation. SSHA will consult with the City's Medical Officer of Health in Q4 of 2019 to support the development of a process to review and approve requests for additional bedrooms based on medical conditions, to be implemented by the end of 2020. <i>Key actions:</i> • Consultations to be initiated with the City's Medical Officer of Health in Q4 2019.	Q4 2020
21	In consultation with the Chief Executive Officer, TCHC, consider the feasibility of using TCHC vacant units held for revitalization to meet the demand for emergency shelter as an alternative to hotels or other temporary shelter options	<i>Management response:</i> Management agrees with this recommendation. SSHA will investigate the complex issues associated with implementation of this recommendation and will work with Toronto Community Housing Corporation to determine the legal, financial, operational and capital development implications of using units earmarked for revitalization. <i>Key actions:</i> • To be initiated in Q4 2019.	To be initiated Q4 2019

Rec #	Recommendation	Key Actions	Completion Date
22	Implement and ensure compliance with procedures to oversee RGI households not selected from the CWL, including procedures and controls to: a. identify and review all current referral agreements to develop a comprehensive inventory of agency referral agreements and the respective number of housing units to be filled through referral agreements b. ensure all current and future referral agreements are approved by the City c. ensure there is a record of all households that are granted rent-geared-to-income assistance and housed through any alternate arrangement in the centralized waiting list information system.	<i>Management response:</i> Management agrees with this recommendation. SSHA will conduct a review of referral agreements, establish an approval process and improve tracking and monitoring processes by Q2 2020. <i>Key actions:</i> • Inventory of known referral agreements from housing provider <i>Project Information Forms</i> has been compiled. A work plan will be developed to facilitate approval of agreements and enhanced tracking and monitoring.	Q2 2020
29	Accelerate implementation of recommendations to ensure rules are updated to allow households with greatest need to receive priority, and that over-housed tenant situations are optimized as quickly as possible.	<i>Key actions:</i> • City-funded shelters have been directed to ensure all shelter clients are provided an opportunity to be placed on the centralized waiting list and assigned the disadvantaged status. • On August 19, 2019, a point-in-time analysis was conducted of shelter clients on the centralized waiting, resulting in 539 applications being updated to disadvantaged status. • At the end of Q3, there were 3,471 eligible applicants identified as having a shelter listed as their address on their application, of which	

Rec #	Recommendation	Key Actions	Completion Date
		40% had been assigned a disadvantaged priority status. Staff will be using this information to update applicants to disadvantaged status where applicable.	
Theme 4: Enhancing oversight, strengthening controls, and increasing integration of processes			
23	Enforce the regular review of housing providers and ensure they are completed as required in compliance with policies and procedures and to take corrective action to address any problems identified in the course of such reviews.	<i>Management response:</i> Management agrees with this recommendation. SSHA has put a plan in place to clear up the current backlog of housing provider reviews by Q4 2020. <i>Key actions:</i> • A review protocol and reporting mechanisms have been developed and will assist management to ensure that housing provider reviews are completed as scheduled.	Q4 2020
24	Ensure the internal controls to review rent-gear-to-income housing providers are reviewed and strengthened to address weaknesses identified from the occurrence of fraud.	<i>Management response:</i> Management agrees with this recommendation. A review protocol and reporting mechanisms have been developed to ensure that housing provider reviews are completed as scheduled. SSHA will also consider, by the end of 2019, how available remedies under the Housing Services Act, 2011 can be best utilized to ensure housing providers are in compliance with the Housing Services Act.	Q4 2019

Rec #	Recommendation	Key Actions	Completion Date
		<i>Key actions:</i> • A review protocol and reporting mechanism are now in place to ensure that housing provider reviews are completed as scheduled. • Work is underway to develop an application that will be used by staff to complete reviews and automate reporting. This is expected to be completed by Q4 2019.	
25	Strengthen internal controls which ensure households on the centralized waiting list and those receiving rent-geared-to-income are eligible.	<i>Management response:</i> Management agrees with this recommendation. Planned actions will ensure that the standards are met. Eligibility assessments will be reviewed and strengthened, based on approved program changes, for implementation by the end of Q4 2020. <i>Key actions:</i> • A work plan to review eligibility assessments by Q2 2020 is being implemented. Work on this tranche is currently ahead of schedule. These reviews include the review of a sample of RGI household files. • The Province has introduced regulation changes which simplify the calculation of RGI subsidy. SSHA will begin to assess the impact of these regulation changes, including the impact on review procedures in Q4 2019.	Q4 2020

Rec #	Recommendation	Key Actions	Completion Date
26	Review how, the City may be able to centralize and integrate initial and ongoing eligibility reviews and income verification for all housing subsidy programs currently dispersed amongst multiple groups (Access to Housing, other City business units, TCHC, and eventually other housing providers) for greater efficiency and oversight.	<i>Management response:</i> Management agrees with this recommendation. SSHA will review opportunities presented through the province's proposed changes to RGI calculation, as well as the potential to integrate other income tested programs in the City of Toronto. As a partner in Human Services Integration, SSHA will be involved in HSI's review of the feasibility and value add of centralized income verification processes; the results of which can help advise SSHA's review of eligibility and income verification processes for housing subsidy programs. <i>Key actions:</i> • The Province has introduced regulation changes which greatly simplify the calculation of RGI subsidy. • SSHA will begin to assess the impact of these regulation changes in Q4 2019.	Q4 2020
28	Collaborate with the Employment and Social Services and Children's Services divisions to ensure implementation of the Human Services Integration project achieves service efficiencies in administering these income based subsidy programs. In the short term, this will include one income assessment process and in the longer term this should be expanded to include other common functions. The implementation should include a rationalization of resources.	<i>Management response:</i> Management agrees with this recommendation. The Human Services Integration Project is a collaborative project overseen by a steering committee which includes the General Managers of Shelter, Support and Housing Administration, Children's Services and Toronto Employment and Social Services. <i>Key actions:</i> • Part of the project will involve the identification of common functions that could	Q1 2020

Rec #	Recommendation	Key Actions	Completion Date
		be more efficiently delivered through integrated processes. • A review of the feasibility and added value of a centralized income verification process, including the possibility of agreements with the Provincial and/or Federal governments or other third parties, was recently initiated.	
30	Report to the October 16, 2019 meeting of the Economic and Community Development Committee on service improvements and modernization initiatives made, to date, to the centralized waiting list for rent-geared-to-income housing, and, the integrity and accuracy of the centralized waiting list data, including the number of active and eligible applicants, as well as the following: a. number of vacancies at each quarter end and aging of how long the unit has been vacant: 1. broken down by reason for vacancy (e.g., unit turnover, held for medical and safety, uninhabitable, etc.), rent-geared-to-income vs. market rent, rentable vs. non-rentable; 2. broken down by size of unit (Bachelor, 1 bedroom, 2 bedroom, etc.); and 3. broken down by portfolio (e.g., seniors-designated, non-designated, mandated, etc.);	No management response. Reporting is ongoing, on a quarterly basis. This report meets this requirement in regards to Q2 2019.	Quarterly

Rec #	Recommendation	Key Actions	Completion Date
	b. number of vacancies filled not using the centralized waiting list; c. average number of offers required to fill a vacancy (annually) and related acceptance rate (percent), refusal rate (percent), withdrawal rate (percent); d. number of offers made annually/quarterly, where the applicant can't be reached; e. number of applications deactivated annually/quarterly vs. the number of applicants who have not confirmed their ongoing interest and access to housing has not had any contact with the applicant in over two years; f. number of applicants on the waiting list listing a shelter as their main address vs. number of applications flagged/deemed priority as homeless; g. number of applicants on the waiting list listing a shelter as their main address vs. number of applicants housed off the waiting list because they were deemed to be a priority as homeless; and h. proportion (percent) of people experiencing chronic homelessness and living in shelters who have applied for the centralized waiting list to receive access to rent-geared-to-income housing.		
31	Report quarterly to City Council, through the Economic and Community Development Committee, on the centralized waiting list for	No management response. Reporting is ongoing, on a quarterly basis. This report meets this requirement in regards to Q2 2019.	Quarterly

Rec #	Recommendation	Key Actions	Completion Date
	social housing, such report to contain the following details: a. the number of people on the waitlist; b. the number of vacant rentable units; c. the number of units filled; d. the number of refused offers; e. the number of withdrawn offers; and f. any other relevant information.		
32	Through the implementation of the new Choice Based Model for access to social housing, expand access to information available through the City's Open Data portal, and report to the Audit Committee by fourth quarter of 2020, on the status of implementation; and City Council request the General Manager, Shelter, Support and Housing Administration to engage Toronto's civic tech community on this project.	Reporting will be brought forward to the Audit Committee by Q4 2020.	Q4 2020
33	Report quarterly to City Council, through the Economic and Community Development Committee, with updates on progress with respect to the implementation of the new Choice Based Model for access to social housing.	No management response. Reporting is ongoing, on a quarterly basis. This report meets this requirement in regards to Q2 2019.	Quarterly
34	Report quarterly to City Council, through the Economic and Community Development Committee, with respect to progress on the recommendations outlined by the Auditor General.	No management response. Reporting is ongoing, on a quarterly basis. This report meets this requirement in regards to Q2 2019.	Quarterly