

Implementing Recommendations from the Auditor General's Report 'Safeguarding RGI Assistance: Ensuring Only Eligible People Benefit'

Date: January 27, 2020

To: Audit Committee

From: General Manager, Shelter, Support and Housing Administration

Wards: All

SUMMARY

This staff report responds to City Council's direction for the Shelter, Support and Housing Administration (SSHA) division to report to the Audit Committee in the first quarter of 2020 with an update on the implementation of the Auditor General's recommendations in the report *Safeguarding Rent-Geared-to-Income Assistance: Ensuring Only Eligible People Benefit*.

The Auditor General's report identified areas where the City can strengthen its oversight role as the Service Manager responsible for rent-geared-to-income (RGI) subsidies administered by over 200 housing providers across Toronto. This includes recommendations to investigate files flagged in the audit as having potential eligibility issues; centralize aspects of RGI administration and monitoring; and increase integration with other income-based subsidy programs.

SSHA agrees with and is working towards achieving all of the Auditor General's recommendations, many of which are in line with SSHA's current direction and modernization initiatives. SSHA's plans for implementation involve a full review of households flagged as having potential eligibility issues; a range of initiatives to build capacity in housing providers and reinforce direction on detecting and addressing fraud; and strengthening the City's oversight mechanisms.

Recognizing the importance of ensuring that RGI assistance is being used for its intended purpose of making rent affordable for low-income households, SSHA has taken direct action to ensure immediate and sustained improvement to the administration of RGI. Early advancements include the development of a comprehensive plan and tracking tools to ensure appropriate follow up on all files flagged by the Auditor General. Updates on actions taken to date and estimated completion dates for all 15 recommendations are outlined in Attachment B.

RECOMMENDATIONS

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

1. Audit 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 will help prevent occurrences of ineligible households receiving assistance and in turn provide more opportunities to support households in need of RGI assistance. This includes people from equity-seeking groups such as seniors, people experiencing homelessness, women, persons 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 improved administration of the RGI program will also support the City's poverty reduction efforts.

DECISION HISTORY

On October 29, City Council adopted the Auditor General's report *Safeguarding Rent-Geared-to-Income Assistance: Ensuring Only Eligible People Benefit*, along with 15 recommendations for City staff regarding the administration and oversight of RGI assistance. One of these recommendations directed staff to provide Audit Committee with an update in Q1 2020 on implementation, including detailed plans and timelines. This report responds to that recommendation.

The staff report and decision document can be accessed at the following link: [Safeguarding Rent-Geared-to-Income Assistance: Ensuring Only Eligible People Benefit](#)

COMMENTS

Toronto's Rent-Geared-to-Income Program

Under the Housing Services Act, 2011 (HSA), the City is the Service Manager responsible for funding and overseeing Toronto's social housing system, managed through the SSHA division. As part of this system, the City provides RGI assistance to over 70,000 households.

RGI assistance improves housing affordability for eligible low-income households who pay no more than 30% of their gross household income on rent, where the difference is subsidized by the City. The benchmark of 30% is the current standard for affordability, as it enables households to manage other costs that support social and economic prosperity, such as spending on healthy food, transportation, training and education. In turn, RGI assistance is a critical component of the City's ability to mitigate or prevent cycles of poverty, housing instability and homelessness.

The City has delegated the responsibility of administering RGI assistance to over 200 non-profit and co-op housing providers, with three quarters of RGI units administered by Toronto Community Housing Corporation (TCHC). Housing providers are responsible for performing a range of activities, including ensuring households are eligible for RGI assistance, which involves verifying household income and assets; conducting annual reviews to ensure continued household eligibility; and addressing potential indications of fraud. The City is responsible for providing oversight to ensure that housing providers follow RGI rules and that recipients of RGI are eligible and rents are calculated appropriately.

Findings in the Auditor General's Report

The Auditor General's report *Safeguarding Rent-Geared-to-Income Assistance: Ensuring Only Eligible People Benefit (October 2019)*, identified ways that the City can improve the administration of RGI and prevent occurrences of ineligible households receiving assistance in the place of households in need.

The Auditor General identified three key areas for improvement:

- Detecting and Investigating Indicators of RGI ineligibility

The Auditor General recommended that the City develop strategies to detect and resolve potential eligibility issues, such as undeclared property ownership and undeclared income.

- Centralizing Key Aspects of RGI Administration to Provide Stronger Oversight

The Auditor General recommended a more centralized approach to City oversight of housing providers, with a standardized system to track and monitor housing provider compliance of program requirements.

- Increasing Integration Amongst Income-Based Subsidy Programs

The Auditor General recommended integrating RGI administration with other City-administered subsidy programs, such as Ontario Works and the Ontario Disability Support Program, to create efficiencies and strengthen the City's ability to assess eligibility and detect fraud.

Implementation Plan

SSHA agrees with the recommendations made by the Auditor General and is taking direct action to ensure immediate and sustained improvement to the administration of RGI. Since the release of the report, progress has been made to resolve immediate issues flagged by the Auditor General and lay the foundation for a culture of improved accountability and meaningful system improvement. A progress chart with updates on actions taken to date and estimated completion dates for each recommendation can be found in Attachment B.

The following summarizes initiatives that will be undertaken by SSHA to implement the Auditor General's recommendations, as well as progress made to date.

Review all files flagged as having potential eligibility issues

The audit flagged 1,360 household records that required SSHA follow up, as they presented signs of potential eligibility issues or fraud related to their RGI assistance, such as unreported property ownership, undeclared income and assets, and documents that appear to be falsified.

SSHA has developed a work plan for the comprehensive review of all files flagged for SSHA follow up, as summarized below in Table 1. As part of this plan, SSHA is designing streamlined processes to gather information from all relevant sources and a tracking system to ensure appropriate City review and follow up on all files. All reviews are estimated to be completed and resolved by the end of 2020.

Table 1: Estimated Timelines for the Review of Files with Potential Eligibility Issues

Phase	Implementation Activities	Estimated Timeline
Phase 1: Collect Information	<ul style="list-style-type: none">• Establish processes and tools for housing providers to submit information• Housing providers to review, prepare and submit files and related documentation to the City.• Work with other City divisions to cross-reference information provided by the Auditor General with information submitted through programs such as Ontario Works and Business Licensing	November to March

Phase	Implementation Activities	Estimated Timeline
Phase 2: Review Files	<ul style="list-style-type: none"> • Review of files by City staff, including verifying information and documents submitted by housing providers, site visits, exchange of information with other City divisions, and review of property registry extracts • Determine the outcome of each file review and appropriate follow up action 	February to September
Phase 3: Follow up action	<ul style="list-style-type: none"> • Support housing providers in taking appropriate action if it is determined that client is ineligible for RGI or there is suspicion of intent to commit fraud 	March to December

SSHA's full review schedule for files with potential eligibility issues, including estimated completion dates by file type, is detailed in Attachment A.

Progress made:

- A separate plan has been developed for each area of potential fraud identified by the Auditor General, where SSHA is responsible for follow up. These include:
 1. Household may not be disclosing all sources of income and assets (52 files)
 2. Discrepancies amongst information provided by household (21 files)
 3. Occupants of more than one unit or tenant is over the age of 100 (281 files)
 4. Household may own undeclared property (620 files)
 5. Inconsistencies with information provided to Ontario Works (304 files)
 6. Possible discrepancies with business license information (82 files)
- All housing providers were provided written notification of the Auditor General's report and directed to ensure RGI files are properly documented in preparation for follow up by City staff in coming weeks.
- Follow up is underway for 21 files that showed discrepancies among the information provided by households. The initial stage of this review, including on-site review of housing provider files, is scheduled to be completed by January 31, 2020.
- The initial stage of the review of other files involves gathering information from housing providers and Toronto Employment and Social Services. This process began in December and will continue through to February.
- TESS is actively investigating the 304 files showing inconsistencies between RGI records and the information that the household provided to Ontario Works.
- Legal Services has started conducting property registration searches on addresses showing indications of property ownership by RGI tenants.
- SSHA has started working with Legal Services to identify the most effective use of remedies allowable under the HSA and determine processes for pursuing offence charges or other legal action against RGI households that have committed fraud.

Build capacity in housing providers

SSHA is developing a range of initiatives to increase the capacity of housing providers to identify and address indications of ineligibility and fraud. Currently, SSHA provides guidance and oversight to housing providers administering RGI through mandatory training, online resources such as the RGI Administration Manual and City Guidelines, and ongoing monitoring and oversight by SSHA staff.

SSHA is reviewing its training resources to determine how it can further promote due diligence, accountability, and consistency in how housing providers administer RGI, including assessing eligibility and responding to potential fraud. As part of this plan, staff will be reviewing and updating the City's RGI Administration Manual and its mandatory RGI training course for housing providers.

Effective July 1 2020, SSHA will implement regulatory changes made under the HSA, which include moving to a much simplified calculation of rent for RGI households. The new rules will result in less onerous administration for housing providers which should allow housing provider and SSHA staff to spend more time ensuring that RGI household eligibility is properly assessed.

Progress made:

- Revisions to the RGI Administration Manual are underway, including enhancing content related to mitigating risk of fraud when assessing household eligibility.
- Online Waiting List Management training was launched on October 1, 2019, with over 150 housing provider staff registered to date. This included improved information on relevant areas of RGI administration, such as steps to assessing and addressing over-housed households and ensuring eligibility when filling vacancies in units with approved mandates.

Strengthen City oversight

SSHA recognizes that having oversight mechanisms that take appropriate corrective action to deter and stop instances of potential fraud is important in maintaining public trust in the integrity of the social housing system. As such, SSHA is working closely with other City divisions and housing providers to implement sustainable improvements to the oversight of the RGI system, including those recommended by the Auditor General.

SSHA staff conduct rotating compliance reviews on all housing providers. In 2019, 53 housing providers were reviewed. SSHA is working towards ensuring that compliance reviews are conducted regularly and in accordance with divisional standards.

As part of these efforts, SSHA has developed a new database tool that enables staff to schedule and conduct on-site compliance reviews, monitor housing provider compliance and carryout remediation plans to correct non-compliance. The new database was implemented in January 2020 and will be used by staff to schedule future reviews using a standard set of risk indicators, such as date of last review and instances of financial or program non-compliance.

Implementing Recommendations from the Auditor General's Report 'Safeguarding RGI Assistance: Ensuring Only Eligible People Benefit'

Moving forward, SSHA will work with Corporate I&T to assess broader technology solutions that can serve as a centralized database with the capability to store various sets of related data, prevent data validation errors, and streamline the conducting and monitoring of housing provider reviews. SSHA will consider the integration of this system with existing City databases and develop a tool for housing providers to support automated RGI calculations.

In addition, SSHA will continue to identify opportunities for information sharing and common fraud detection functions with other City income-based assistance programs, to create efficiencies and detect inconsistencies in the information provided by mutual clients. To this end, SSHA has recently met with related divisions, including Human Service Integration, Toronto Employment and Social Services, Children's Services, Legal Services and Municipal Licensing and Standards.

Progress made:

- New staff resources have been assigned to support the review and improvement of the City's RGI accountability mechanisms, including the development of standardized investigation tools, processes, and monitoring systems.
- RGI and operational reviews are being scheduled using a risk-based approach, prioritizing areas where the likelihood of non-compliance is highest.
- In January 2020, staff began utilizing a new centralized database to track, monitor, and collect information on all housing provider operational reviews, allowing for more comprehensive and readily available information on review completion and housing provider compliance.
- SSHA is reviewing the capability of social housing management technology to assess whether it can also be used by housing providers to enter household data that can be used by SSHA when conducting reviews of RGI households.
- SSHA consulted with Human Services Integration partners (Children's Services, Toronto Employment and Social Services and Human Services Integration Office) to discuss current practices for the investigation of allegations of client fraud and the development of protocols for interdivisional information sharing.

Conclusion

SSHA is committed to working towards the implementation of all recommendations made in the Auditor General's report and reducing occurrences of ineligible households receiving assistance in place of eligible households in need.

SSHA has made progress in advancing the implementation of the Auditor General's recommendations, including taking immediate action to develop a comprehensive plan and corresponding tools to follow up on files flagged in the audit as having potential eligibility issues, as well as conducting consultation and analysis to support overall system improvements in the areas of centralized monitoring and program integration.

Moving forward, SSHA will continue to identify and implement sustainable strategies that support the capacity of housing providers to detect and address fraud and strengthen the City's ability to effectively and efficiently oversee compliance.

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ATTACHMENTS






Attachment A: SSHA Review Schedule for Files with Potential Eligibility Issues
Attachment B: Progress Chart


Attachment A: SSHA Review Schedule for Files with Potential Eligibility Issues



Phase 1: Collect Information
Phase 2: Review Files
Phase 3: Follow up action


File Type	Number of Files	2019	2020											
		Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec
May not be disclosing all sources of income and assets	52	Phase 1	Phase 1	Phase 1				Phase 2	Phase 2	Phase 2	Phase 2			
Discrepancies amongst information provided by household	21	Phase 1	Phase 1		Phase 2	Phase 2	Phase 2	Phase 2	Phase 2			Phase 3	Phase 3	
Occupants of more than one unit or tenant is over the age of 100	281		Phase 1	Phase 1		Phase 2	Phase 2					Phase 3	Phase 3	
May own undeclared property	620		Phase 1	Phase 1		Phase 2	Phase 2	Phase 2						
Inconsistencies with information provided to Ontario Works	304	Phase 1	Phase 1	Phase 1	Phase 1			Phase 2	Phase 2	Phase 2	Phase 2	Phase 2		
Possible discrepancies with business license information	82		Phase 1	Phase 1		Phase 2	Phase 2	Phase 2	Phase 2	Phase 2			Phase 3	Phase 3


Attachment B: Progress Chart




Legend	On Track 	Complete 
Monitoring 	Not Yet Initiated 	Delayed 

	Recommendation	Status	Management Response	Target Date	Actions Taken
1	City Council request the General Manager, Shelter, Support and Housing Administration Division, to ensure all rent-geared-to-income households identified by the Auditor General as having potential eligibility issues are appropriately reviewed.		Management agrees with this recommendation. SSHA has initiated, and will continue to prioritize, the review of all cases having potential eligibility issues identified by the Auditor General.	Q4 2020	<p>Provided all housing providers with information related to households that require follow-up work. A work plan has been developed for each area of potential fraud identified by the Auditor General. Additionally, reporting forms and tracking mechanisms to review all cases of potential ineligibility issues have been created.</p> <p>Initiated work with housing providers on files with discrepancies among documents provided by household.</p> <p>Requests for follow-up have been sent to housing providers on files with possible undisclosed income and/or assets, requiring report back by end of February.</p> <p>Legal Services has started conducting property registration searches on addresses showing indications of property ownership by RGI tenants.</p>
2	City Council request the General Manager, Shelter, Support and Housing Administration Division, to develop a strategy to ensure housing providers complete		Management agrees with this recommendation. SSHA is working with providers to conduct household eligibility reviews. A risk-based approach will be developed	Q2 2020	Use of a database tool to allow quicker completion of operational & RGI reviews and more effective follow-up on housing provider actions was implemented on January 2, 2020.



	Recommendation	Status	Management Response	Target Date	Actions Taken
	<p>comprehensive reviews of all rent-geared-to-income (RGI) households to identify potential eligibility issues including property ownership, indicators of undeclared sources of income or assets and irregular supporting documents. This should include:</p> <ul style="list-style-type: none"> a. a mechanism for providers to report potential eligibility issues to the City for monitoring purposes b. a centralized process to track reported eligibility concerns and the follow-up action taken c. a secondary review of RGI files by Shelter, Support and Housing Administration staff, selected based on risk, to ensure the quality of reviews being performed by housing providers. Risk identification should be data driven and based on analysis of data from various sources. 		<p>to identify eligibility reviews that require additional review by City staff. Once identified, SSHA will conduct more in-depth reviews. Additional staff resources have been assigned to the social housing portfolio to support this work.</p> <p>A review protocol and reporting mechanisms will be put in place to support housing providers in reporting concerns with household eligibility and SSHA in managing effective follow up, this work will be completed by Q2 2020.</p>		RGI reviews have been scheduled using a risk-based approach. SSHA continues to refine its risk-based approach to target where the likelihood of noncompliance is highest.
3	City Council request the General Manager, Shelter, Support and Housing Administration Division, to develop a training plan to		Management agrees with this recommendation. SSHA will enhance the Rent-Geared-to-Income Manual and develop improved tools	Q2 2020	Revisions to improve the RGI Administration Manual remain in progress. The revisions include enhancements made to areas of risk related to fraud.




	Recommendation	Status	Management Response	Target Date	Actions Taken
	enhance providers' abilities to more effectively identify and act on potential ineligibility and fraud indicators, including fake and forged documents, unauthorized occupants and subletting.		and training for a consistent approach by housing providers in response to potential fraud by Q2 2020.		
4	City Council request the General Manager, Shelter, Support and Housing Administration Division, to update the RGI Administration Manual to explicitly identify supporting documents to obtain, appropriate analysis of information to be completed and documentation requirements regarding actions taken to address exceptions. The Manual should emphasize the importance of maintaining good documentation of the steps performed when reviewing household eligibility. These requirements should be consistently applied except under circumstances where accommodation is required.		Management agrees with this recommendation. SSHA is currently updating the Rent-Geared-to-Income Manual to include clear requirements for housing providers on obtaining supporting documentation, including criteria for exceptions, by Q2 2020.	Q2 2020	Revisions to improve the RGI Administration Manual remain in progress.
5	City Council request the General Manager, Shelter, Support and Housing Administration Division, in		Management agrees with this recommendation. SSHA will work with the City Solicitor to develop a	Q2 2020	Legal Services has been engaged on the development of a process for pursuing offence charges. Legal Services has determined that these prosecutions are


	Recommendation	Status	Management Response	Target Date	Actions Taken
	<p>consultation with the City Solicitor, to:</p> <p>a. develop a process for pursuing offence charges against RGI households where eligibility information has been misrepresented</p> <p>b. provide guidance and support for housing providers when potential eligibility issues arise that indicate fraud, to ensure appropriate legal action is taken under the Residential Tenancies Act, Housing Services Act or the Criminal Code of Canada.</p>		<p>process and reference materials for housing providers regarding pursuing appropriate action under the Housing Services Act, Residential Tenancies Act or the Criminal Code where instances of fraud exist. Additional information will be included in the updated Rent-Geared-to-Income Manual explaining the process to follow once eligibility related fraud has been identified. This will be completed by Q2 2020.</p>		<p>"private prosecutions" that would require working with a prosecutor on the provincial Attorney-General's staff.</p>
6	<p>City Council request the General Manager, Shelter, Support and Housing Administration Division, to designate Eligibility Review Officers (ERO) in order to effectively investigate eligibility concerns and suspected fraud. Protocols should be established and communicated to housing providers on how to refer files to the ERO for further assessment. Appropriate case</p>		<p>Management agrees with this recommendation. SSHA will review opportunities to establish an Eligibility Review Officer role to strengthen the ability to investigate Rent-Geared-to-Income related fraud by Q2 2020.</p>	Q2 2020	<p>Legal Services has been engaged to confirm the ERO(s) can be designated by the General Manager. Once confirmed, SSHA will consider opportunities to temporarily assign staff as an ERO(s) to assist with the investigative process while the development of policies, procedures and operational standards are finalized to direct the investigative process.</p>


	Recommendation	Status	Management Response	Target Date	Actions Taken
	management processes should be implemented to track referred files and actions taken.				
7	<p>City Council request the General Manager, Shelter, Support and Housing Administration Division, to:</p> <p>a. directly administer the eligibility reviews for households seeking RGI assistance and entering into RGI housing</p> <p>b. work in partnership with housing providers to ensure adequate supports are in place for them to continue to manage the ongoing annual eligibility review process</p> <p>c. consider how resources can be optimized to ensure cost-effectiveness.</p>	  	<p>Management agrees with this recommendation. Through the implementation of the new choice-based waitlist management system in Q4 2020, SSHA will centrally administer eligibility assessments of households prior to entering Rent-Geared-to-Income housing. SSHA will develop interim processes for income and asset verification for new rent-geared-to-income household and will begin implementation in Q1 2020. SSHA will also strengthen the communication and direction to housing providers to support the annual eligibility review process.</p>	Q1 2020	<p>Completed quality assurance (QA) testing of the new RGI e-form. Additionally, changes about the new RGI e-form were communicated to housing providers based on QA results and from initial input provided by housing providers.</p> <p>An interim process is being developed to conduct income verification for new RGI applications while draft policy for new income and assets limits is finalized and approved.</p>
8	City Council request the General Manager, Shelter, Support and Housing Administration Division, to:		<p>Management agrees with this recommendation. Management will work with Corporate I&T, the City's Chief Information Officer, Human Service Integration</p>	Q4 2020	<p>Reviewed the use of the social housing management technology to enable housing providers to enter household and eligibility data that can be used by SSHA to conduct reviews of RGI households.</p>

	Recommendation	Status	Management Response	Target Date	Actions Taken
	<p>a. create and maintain a centralized database that can be used by the City and its housing providers for the purposes of administering rent-geared-to-income (RGI) household data, assessing eligibility, and automating calculation of RGI rent</p> <p>b. establish a process for collecting and retaining all supporting documents in electronic format that are accessible by authorized individuals. This process should address retention policies for electronic records and the potential for households to electronically submit documents</p> <p>c. consider how a centralized database can be effectively integrated with other information systems and data sources for the purposes of data analysis and to verify eligibility</p> <p>d. obtain and leverage data from various sources to support the ability to identify</p>		<p>Partners, City Legal and others to assess technology solutions that include appropriate system access controls, input and validation controls – to prevent data validation errors and ensure conformance with Housing Services Act rules, allow for electronic record storage and provide database and reporting capabilities by Q4 2020. SSHA will consider the integration of this system with existing City databases and will develop an automated tool for housing providers to calculate Rent-Geared-to-Income, consistent with changes by the Province for new Rent-Geared-to-Income rules.</p> <p>SSHA will determine appropriate data sets, both internally and externally and pursue necessary data sharing agreements that will assist with verification of income and assets to ensure proper review of eligibility by the housing provider by Q4 2020.</p>		

	Recommendation	Status	Management Response	Target Date	Actions Taken
	any potential issues that require further review by both the provider and the City.				
9	<p>City Council request the General Manager, Shelter, Support and Housing Administration Division, in consultation with the City Solicitor, to:</p> <p>a. develop adequate consent and disclosure forms that are understandable and allow for the collection of voluntary, expressed and informed consent to share information to verify rent-gear-to-income (RGI) eligibility. Consideration should be given to whether a common consent process can be used by all income-based assistance programs. These forms should be mandatory and electronic for all housing providers to use</p> <p>b. ensure fully completed annual income and asset review and signed consent forms are retained on file for all RGI household members</p>	 	<p>Management agrees with this recommendation. SSHA will work with the City Solicitor to develop a consent form and provide training and oversight to ensure consent forms are used and retained by Q2 2020. This will align with the Province's changes to the rules that govern the Rent-Geared-to-Income program.</p>	Q2 2020	<p>Collaborated with Corporate Information Management Services to conduct a review of the current consent forms and proposed changes.</p> <p>Will continue to work with the Human Services Integration Office to explore options for common consent forms.</p>

	Recommendation	Status	Management Response	Target Date	Actions Taken
	and that appropriate action is taken where households fail to provide these forms.				
10	<p>City Council request the General Manager, Shelter, Support and Housing Administration Division, in consultation with the City Solicitor, to:</p> <p>a. consider both internal and external information sources that can support more efficient eligibility verification</p> <p>b. establish agreements with data owners so that data can be accessed for the purposes of verifying rent-geared-to-income eligibility.</p>	 	Management agrees with this recommendation. SSHA will work with the City Solicitor to determine appropriate data sets and approach data owners to establish the appropriate agreements by Q4 2020.	Q4 2020	Engaged Corporate Information Management Services to determine privacy and access constraints to external data sources.
11	<p>City Council request the General Manager, Shelter, Support and Housing Administration Division, to:</p> <p>a. ensure monitoring controls, including operational reviews, are being performed as per established divisional procedures and in a timely manner</p>		Management agrees with this recommendation. SSHA is prioritizing housing providers Rent-Geared-to-Income reviews, to ensure we are current with required per established divisional procedures. Additionally, SSHA will enhance existing processes to ensure housing providers respond and that	Q1 2020	<p>Operational reviews completed in accordance with established divisional procedures.</p> <p>Use of a database tool to allow quicker completion and tracking of operational & RGI reviews and more effective follow-up on housing provider actions was implemented on January 2, 2020.</p>

	Recommendation	Status	Management Response	Target Date	Actions Taken
	b. develop a centralized tracking process to monitor operational review results and provider responses. Strong remediation plans should be implemented for providers that fail to comply. A follow-up process should be developed to ensure that non-compliant providers are acting on recommended improvements in a timely fashion.		appropriate follow-up is taken and documented by Q1 2020.		
12	City Council request the General Manager, Shelter, Support and Housing Administration Division, to establish a centralized divisional investigation and fraud detection function. The City should consider the opportunity for efficiencies of combining this function with the other income-based assistance programs.		Management agrees with this recommendation. Opportunities to establish a centralized fraud detection function will be considered in collaboration with the General Managers of Children's Services and Employment and Social Services, and will establish whether there is benefit to leverage this function across similar existing roles at the City by Q2 2020.	Q2 2020	Initiated a review of potential evidentiary sources to support a process for investigations. Additionally, initiated work to evaluate the merits of separating an inspection vs. investigation function within the Division. Engaged with Human Services Integration (HSI) partners (Children's Services, Employment and Social Services and Humans Services Integration Office) to discuss current practices for investigation of allegations of client fraud and the development of protocols for interdivisional information sharing.
13	City Council request the Deputy City Manager, Community and Social		Management agrees with this recommendation. The Human Services Integration	Q3 2020	Engaged with HSI partners (Children's Services and Employment and Social Services) regarding investigative best

	Recommendation	Status	Management Response	Target Date	Actions Taken
	Services, to expand the scope of the Human Services Integration to achieve even greater efficiencies from information sharing and a common fraud investigation function to optimize resources and ensure cost-effectiveness.		<p>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. Part of the project work involves the identification of common functions that could be more efficiently delivered through integrated processes.</p> <p>The project will continue to explore opportunities for information sharing between/across programs within current legislative requirements by Q3 2020.</p>		practices and the benefits of exchange of information related to eligibility evaluations for shared clients. Further review by Legal Services & Corporate Information Management Services is being conducted to ensure information exchanges are in compliance with legal and privacy regulations.
14	City Council direct the General Manager, Shelter, Support and Housing Administration, to provide monthly updates regarding progress on the recommendations contained in Item AU4.5, to the Auditor General and the Chair of the Audit Committee until these recommendations have been fully implemented.		No management response.	Ongoing	Reporting provided monthly to the Auditor General's Office and the Audit Committee Chair on the status of implementing the recommendations.

	Recommendation	Status	Management Response	Target Date	Actions Taken
15	City Council direct the General Manager, Shelter, Support and Housing Administration to report to the Audit Committee in Q1 2020 with an update on the implementation of the Auditor General's recommendations, with the report to include detailed plans and timelines for implementation.	✓	No management response.	Q1 2020	Report to Audit Committee - February 10, 2020.