



REPORT FOR ACTION

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

Date: February 24, 2020

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 on the administration of the waiting list for subsidized housing. As detailed in the Management Response, SSHA agrees with and is working towards achieving all of the Auditor General's recommendations.

City Council requested that SSHA report quarterly to the Economic and Community Development Committee with information on improvements made to the waiting list, including the accuracy of waiting list data, the average number of offers required to fill a vacancy, and how long units stay vacant. SSHA was also requested to report quarterly with updates on progress in implementing the choice based housing access model and advancing the Auditor General's recommendations (Attachment A).

This report provides the information requested for the fourth quarter of 2019.

RECOMMENDATIONS

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

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

FINANCIAL IMPACT

There is no financial impact resulting from the adoption of the recommendation in this report.

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, 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 more timely access to subsidized housing will also support the City's poverty reduction efforts.

DECISION HISTORY

On December 4, 2019, the Economic and Community Development Committee adopted the report *2019 Third Quarter Status Report on Audit Recommendations: Opening Doors to Stable Housing*, which responded to City Council's request that SSHA report quarterly with specified information on the administration of the centralized waiting list. This report covered the third quarter of 2019.

The staff report and decision document can be accessed at the following link:
[2019 Third Quarter Status Report on Audit Recommendations: Opening Doors to Stable Housing](#)

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 with specified information on the administration of the centralized waiting list. This report covered the second quarter of 2019.

The staff report and decision document can be accessed at the following link:
[2019 Second Quarter Status Report on Audit Recommendations: Opening Doors to Stable Housing](#)

On September 18, 2019, Bid Award Panel reviewed and adopted BA44.9, which granted authority to award the contract for the new choice-based housing access system.

The staff report and decision document can be accessed at the following link:
[Award of Vendor of Record \(VOR\) Arrangement No. 17290 to Yardi Canada Ltd. for Integrated Housing Management System](#)

City Council, on July 16, 2019 adopted the report, *Opening Doors to Stable Housing: An Effective Waiting List and Reduced Vacancy Rates Will Help More People Access Housing*, from the Auditor General. This report included a series of recommendations regarding ways the City can improve the administration of its centralized waiting list for subsidized housing.

The staff report and decision document can be accessed at the following link:
[Opening Doors to Stable Housing: An Effective Waiting List and Reduced Vacancy Rates Will Help More People Access Housing](#)

COMMENTS

The Auditor General's 2018 Audit Plan included an operational review of SSHA, to be completed through a series of audits that focus on different operational components. The report, *Opening Doors to Stable Housing: An Effective Waiting List and Reduced Vacancy Rates will Help More People Access Housing (June 2019)*, presented findings from the audit that focused on the administration of the centralized waiting list.

The centralized waiting list is made up of all households who submit an application for rent-geared-to-income (RGI) assistance. TCHC and other non-profit housing providers use the waiting list to contact applicants that have applied to live in their buildings and fill vacant RGI units. Generally, applicants are housed on a first-come first-serve basis, however there are also defined priority groups that received fast-tracked access when RGI units become available.

The Auditor General's report identified ways that the City can improve how it manages the centralized waiting list and support timely and equitable access to the limited supply of RGI units. This includes 34 recommendations organized into four areas: improving the centralized waiting list to effectively manage access to RGI assistance; making better use of housing units to open doors for more people to access RGI assistance; reviewing priorities for RGI and other housing assistance; and enhancing oversight, strengthening controls, and increasing integration of processes.

SSHA agrees with, and is currently working towards all recommendations made by the Auditor General. In 2019, SSHA met all recommendations with a 2019 completion date. Updates and estimated completion dates for each recommendation are included in the Progress Chart in Attachment A.

Outlined below are highlights of actions taken to date, achievements made in Q4 2019, and centralized waiting list data and information requested by City Council.

New Choice Based Housing Access Model - Implementation Updates

SSHA is implementing a new choice based access model that aims to empower applicants to make more informed choices that meet their individual housing needs.

The choice based access model is supported through a range of initiatives being implemented by SSHA. This includes modernizing administration systems; enhancing online tools to make it easier for applicants to manage and update their applications; developing new business and performance monitoring processes; and conducting ongoing stakeholder engagement and housing provider training.

A key initiative supporting the new choice based housing access model is the procurement and development of a new waiting list management software system. On

September 18, 2019, the City's Bid Award Panel approved Yardi Canada Ltd as the selected vendor to develop the City's new choice based housing access I&T system. The selected vendor was also procured by TCHC to manage its housing portfolio, which will facilitate system integration.

Figure 1: Choice Based Housing Program Implementation Timelines



Key advancements:

- The vendor selected to develop the City's new choice based housing access I&T system, has been secured and on-boarded to the project.
- Staff are currently in the discovery phase of the project, working with stakeholders to combine information, review processes, and assess gaps in business requirements.
- Analysis is ongoing to support data migration from the existing waiting list system and ensure data quality in the transfer of all waiting list records.
- A joint working group with TCHC has been established to collaboratively guide project implementation and ensure business integration.

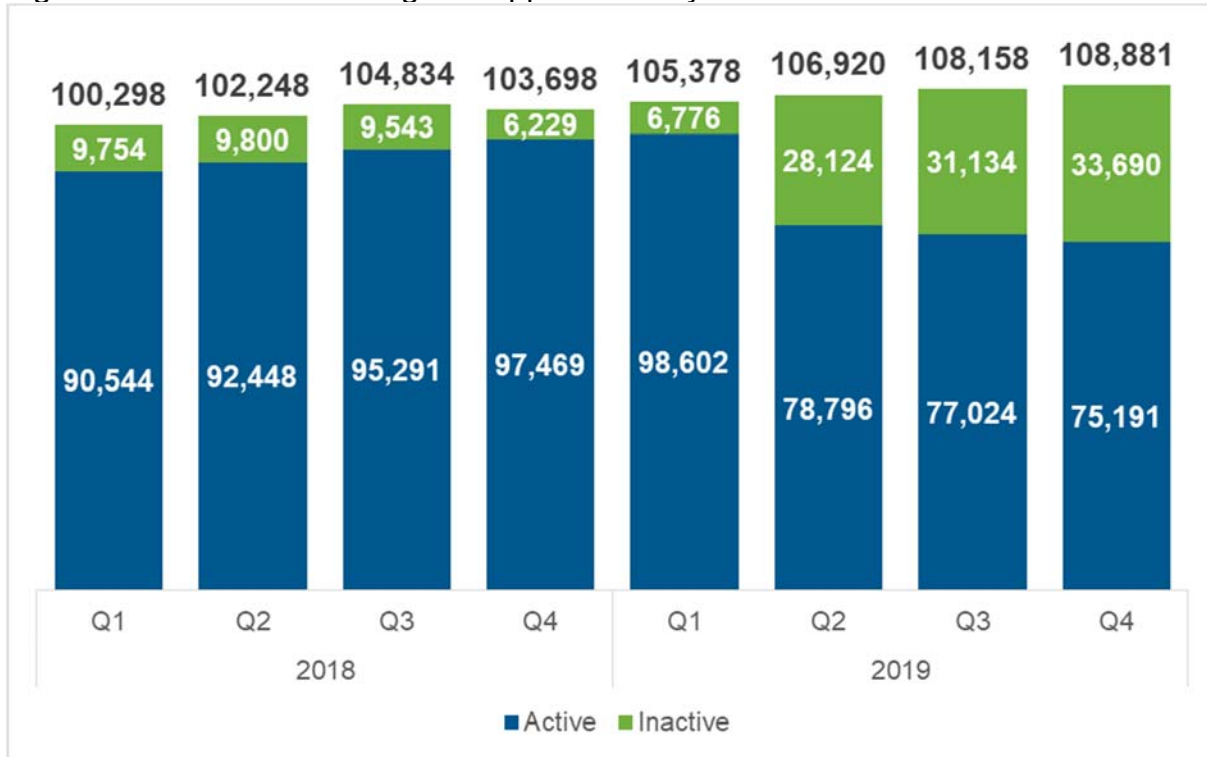
Households on the Centralized Waiting List

SSHA continues to improve the accuracy of the centralized waiting list to ensure applicant information and housing choices are up-to-date, in order to help housing providers fill vacancies faster.

As part of these efforts, SSHA has been utilizing an Automated Outbound Calling tool to remind applicants who have not made contact with the City in over 18 months, to contact the City and confirm or update their information.

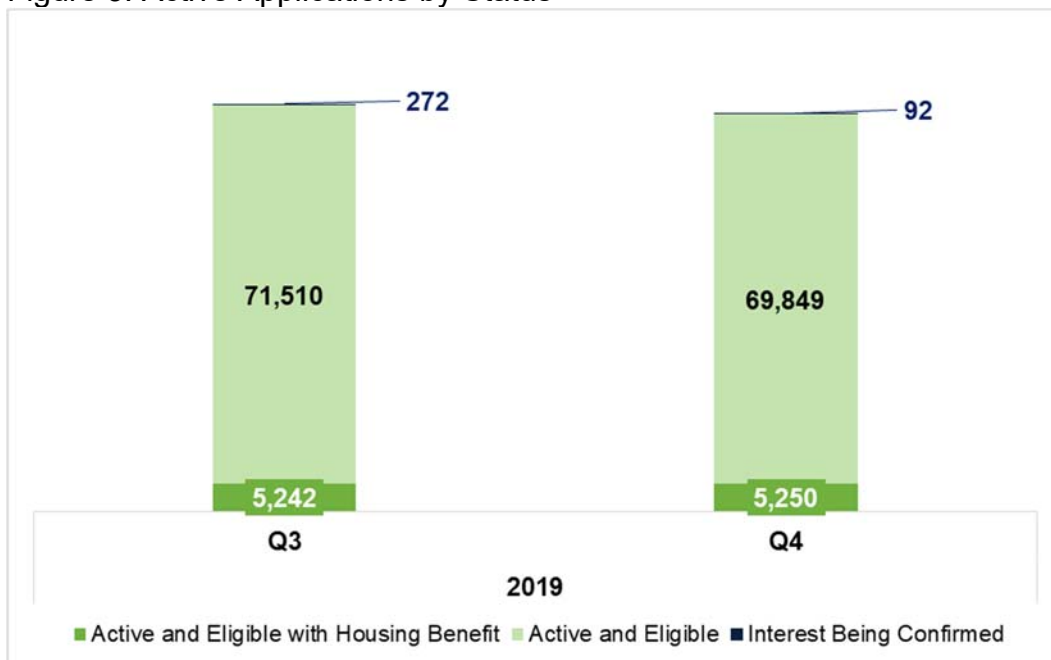
In Q4 2019, SSHA contacted over 3,590 applicants using this tool. This contributed to a total of 4,562 applicants being placed in inactive status and given 18 months to make contact to reinstate their application. Files can be made inactive for a variety of reasons, including no contact from applicant, returned mail, or applicant not ready to move.

Figure 2: Centralized Waiting List Applications by Status



As shown in Figure 2, the active centralized waiting list decreased by 1,833 in Q4. This decline is a result of 4,562 applications being changed to inactive status, 872 households being housed and 2,146 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 to confirm on-going eligibility.

Figure 3: Active Applications by Status



Of the 75,191 active applications (representing 139,989 individuals) on the centralized waiting list at the end of Q4, 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.

Key advancements:

- There were 75,191 active households on the centralized waiting list at the end of Q4. This represents a decrease of 1,833 households since Q3.
- There were 4,562 applicants made inactive in Q4.
- The number of active households who have not made contact with the City in over two years has been reduced from 23,794 in Q1 2019, to 92 in Q4.
- 872 households were housed off the centralized waiting list in Q4, the highest period in 2019.

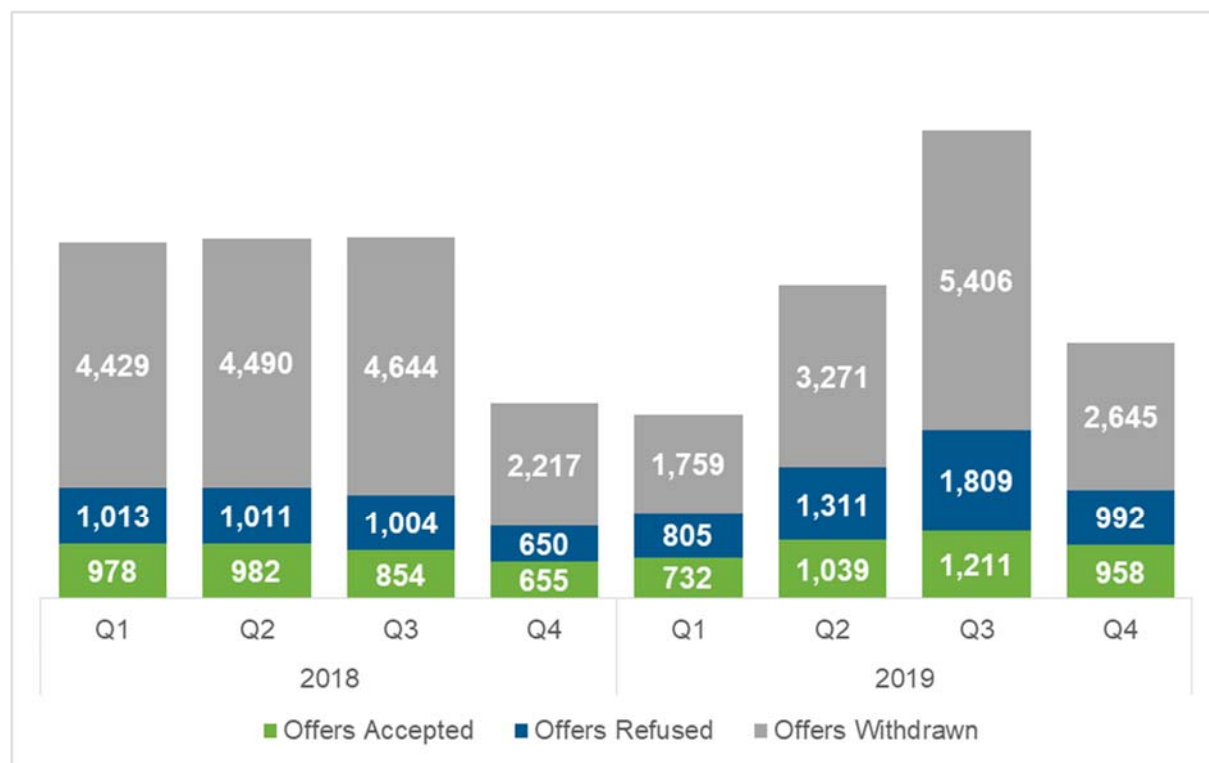
Housing Offers

SSHA is working to reduce the number of offers it takes to fill a vacancy, and in turn reduce how long units are sitting vacant unnecessarily. This includes outreach efforts to remind applicants of the requirement to contact the City every 18 months to confirm or update their application information, in order to improve the accuracy of contact information and housing preferences.

In addition, SSHA is working to build capacity in housing providers to more effectively and efficiently fill vacancies in compliance with City policies and legislative requirements. Initiatives underway include revamping the Waiting List Management training and updating the RGI Administration Manual with improved and updated information on waiting list rules and processes, including making offers.

New content reinforces how offers should be classified, which will help reduce the number of offers it takes to fill a unit. As a result, the number of withdrawn offers decreased from 5,406 in Q3 to 2,645 in Q4, and the withdrawal rate decreased from 62% in Q3, to 57% in Q4. The refusal rate remained at 21% since Q3, however the number of refused offers decreased from 1,809 in Q3 to 992 in Q4. In addition, the offer acceptance rate increased in Q4, from 14% in Q3, to 21% in Q4.

Figure 4: Housing Offers



In Q4, there were 543 attempted offers to applicants that could not be reached, down from 1,109 in Q3; and 415 attempted offers to applicants who had up-to-date contact information but did not respond, down from 501 in Q3. Housing providers are putting these applications on hold while the City follows up with applicants.

SSHA has seen an overall annual decrease in the average number of offers required to fill a vacancy, going from 6.8 in 2018, to 5.8 in 2019. SSHA continues to work with housing providers to ensure that offers are being made to rent-ready applicants and to decrease their average number of offers.

In addition to the vacant RGI units offered to applicants on the centralized waiting list, there were 21 vacancies filled through referral agreements and 60 vacancies filled through converting market rent households to RGI in Q4 2019.

Key advancements:

- Since the launch of the revamped Waiting List Management training on October 1, there has been 124 registrants from 33 housing providers. The new training included improved and updated information on waiting list rules and processes.
- The offer withdrawal rate decreased from 62% in Q3, to 57% in Q4.
- The offer acceptance rate increased from 14% in Q2, to 21% in Q4.

Toronto Community Housing Corporation Vacancies

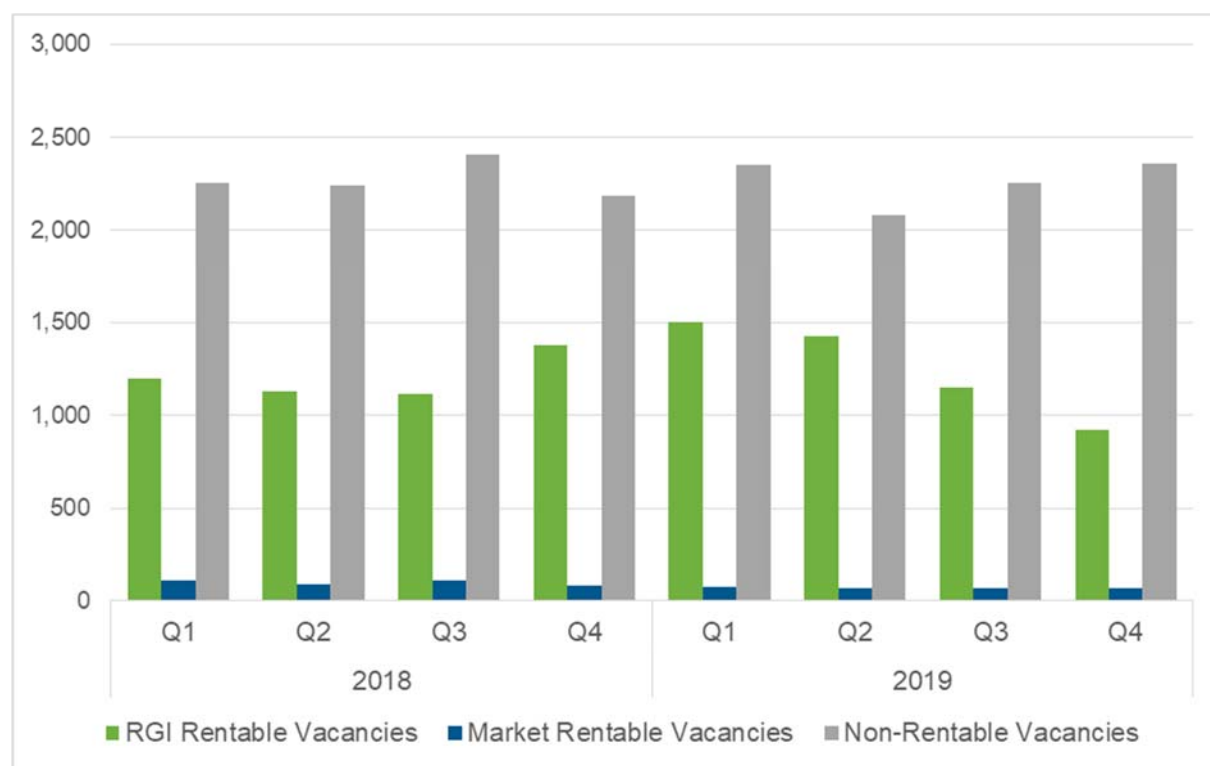
In its capacity as service manager, the City continues to support TCHC's strategies to better manage vacancies. TCHC has provided City staff with the data below in response to City Council's request for detailed reporting on vacancies and vacancy management.

TCHC has revised past vacancy data for Q4 2018, Q1 2019, and Q2 2019, to include vacant units that were being held under a new 'Crisis' category established in response to a recommendation made in the Ombudsman's report, *Investigation into Toronto Community Housing Corporation's Medical and Safety at Risk Priority Transfer Process*. These units were not previously reflected in TCHC's data.

TCHC Vacancy Rates

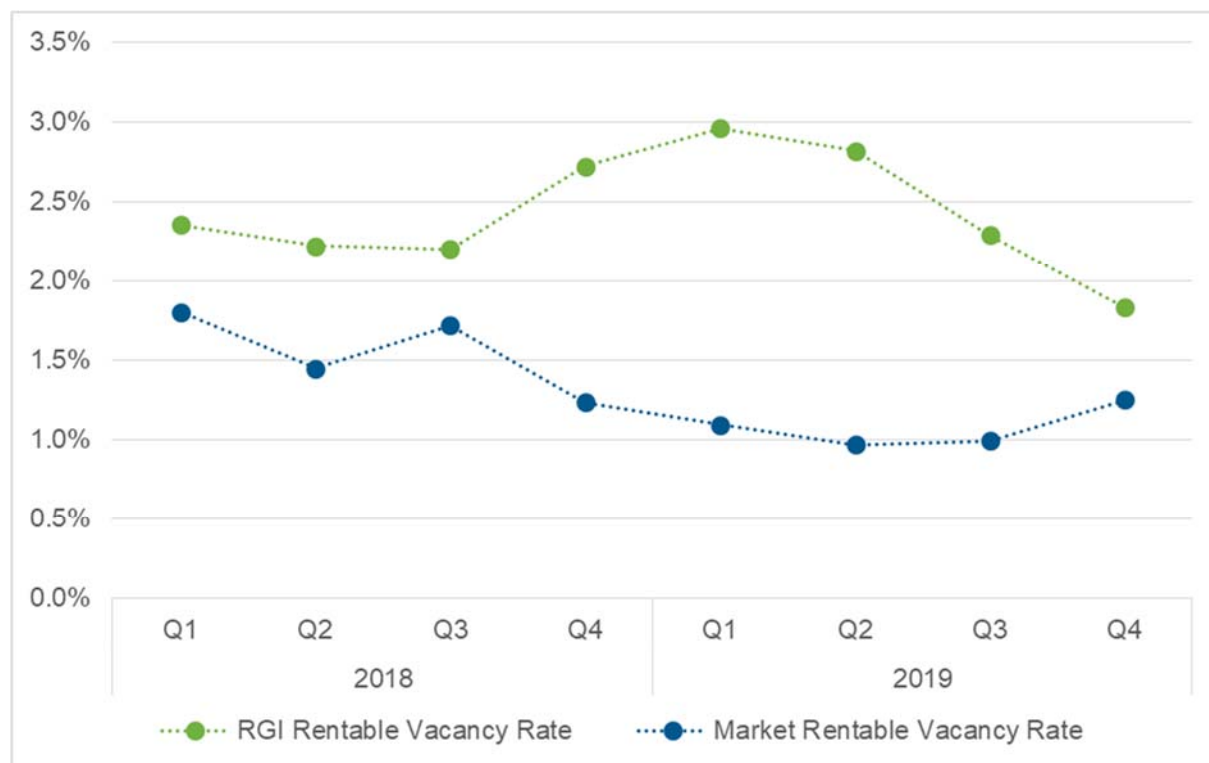
TCHC had a total of 3,338 vacant units at Q4, down from 3,451 in Q3. This includes vacant units that are rentable and units that are non-rentable due to impacting factors such as revitalization projects, capital repairs, and pending sales or transfers to other operators.

Figure 5: TCHC Vacancies



As seen in Figure 5, TCHC made progress in reducing their *rentable* RGI vacancies from 1,153 units in Q3 to 920 in Q4, a decrease of 233 units. However, there was an increase of 103 vacant *non-rentable* units, rising from 2,255 in Q3 to 2,358 in Q4.

Figure 6: TCHC Vacancy Rates



While there was a slight rise in the vacancy rate for rentable market units from 0.99% to 1.25%, the vacancy rate for rentable RGI units has decreased from 2.29% in Q3 to 1.83% in Q4.

New staff hired by TCHC have increased the volume of offers being made, which has contributed to the vacancy rate decrease seen in Q4. The primary focus of the new staff is filling bachelor units, as that unit size is currently the most challenging to rent. These efforts will continue in 2020.

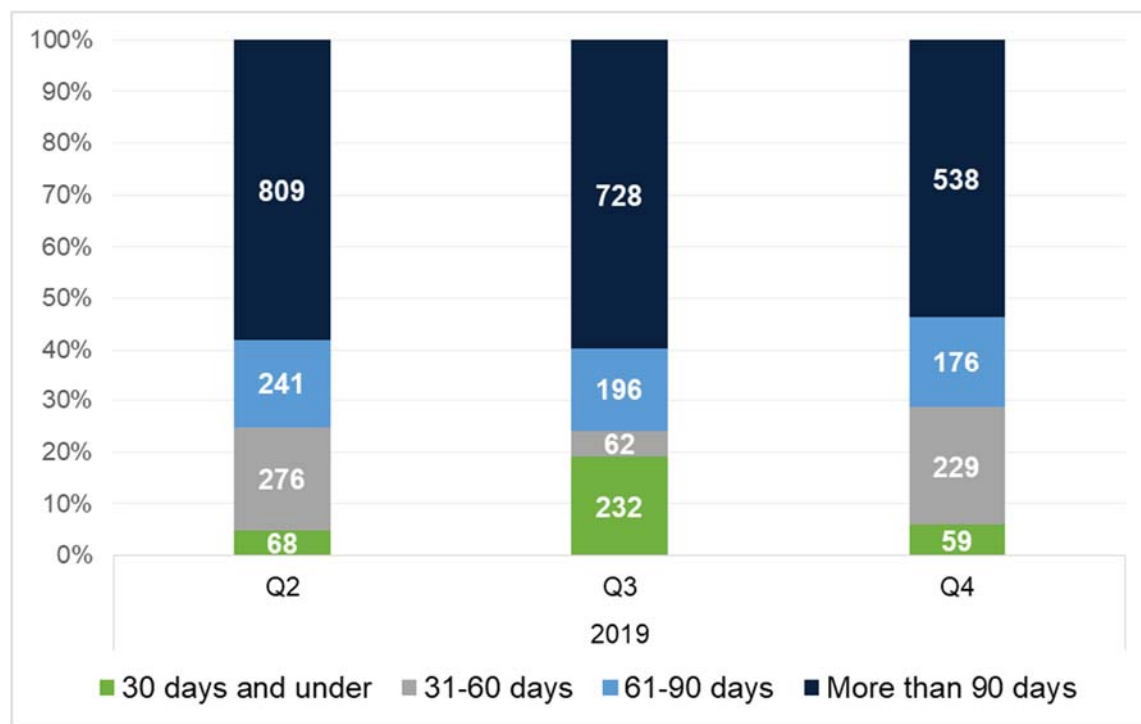
Key advancements:

- The new staff hired by TCHC in Q3 and Q4, have increased the volume of offers being made and driven down the RGI vacancy rate to 1.83% in Q4. This quarterly rate exceeded TCHC's performance target of 2%.

TCHC Aged Vacancy Data

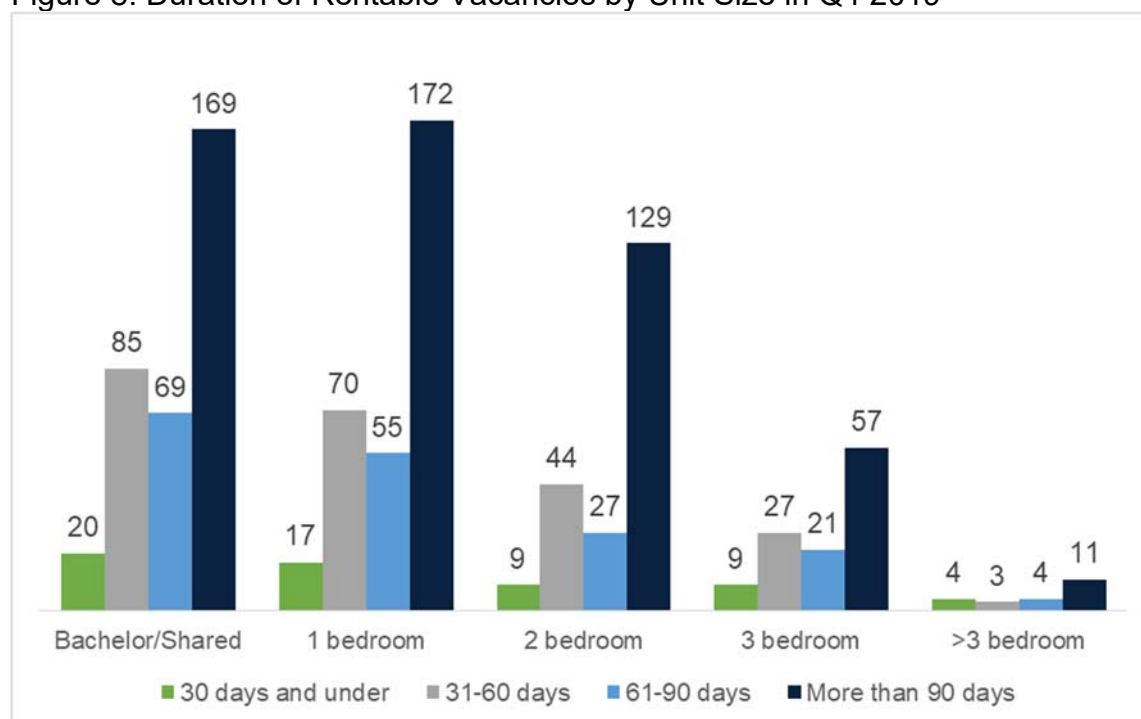
A rentable unit typically remains vacant for 30 days during the process of unit turnover. Two key reasons that a rentable unit remains vacant for more than 90 days is that it is being held for relocation or for capital repairs.

Figure 7: Duration of Vacancies for Rentable Units in Q2, Q3 and Q4 2019



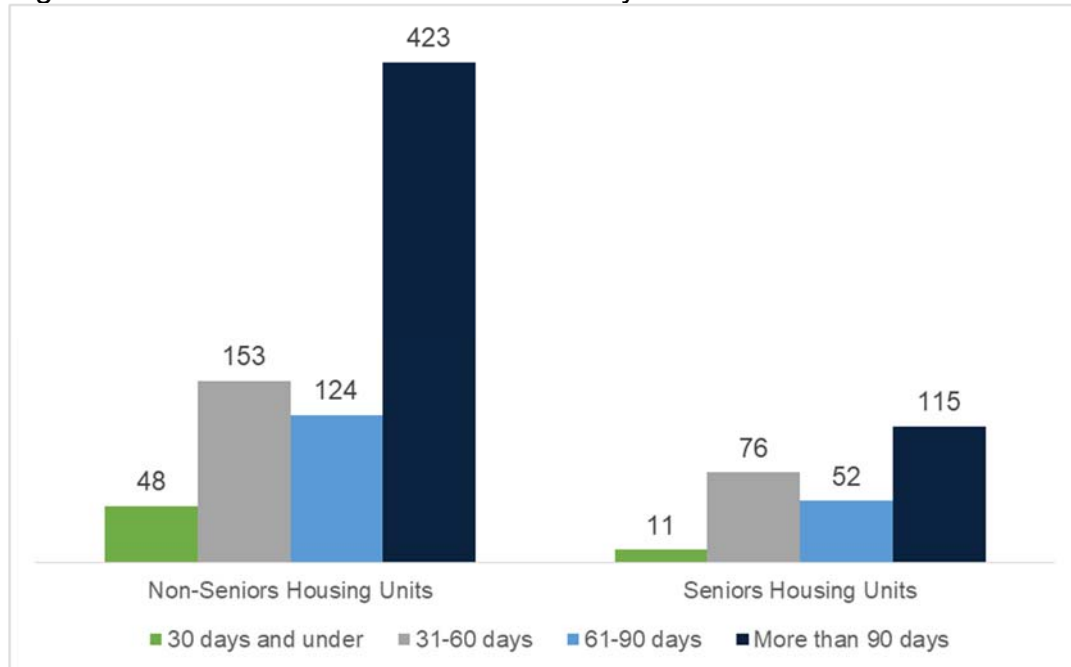
As seen in Figure 7, there has been a steady decline in units that remained vacant for more than 60 days since Q2. The number of units that remained vacant for 61 to 90 days decreased from 241 to 176; and the number of units that remained vacant for over 90 days decreased from 809 units to 538 units.

Figure 8: Duration of Rentable Vacancies by Unit Size in Q4 2019



In Q4, all unit sizes saw a decline in the number of rentable units that remained vacant for over 90 days. Larger units with three bedrooms or more showed the largest decline in the percentage of units vacant for over 90 days, decreasing from 68% of units in Q3 to 50% in Q4.

Figure 9: Duration of Rentable Vacancies by Mandate in Q4 2019



As shown in Figure 9, 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.

Key advancements:

- TCHC has reduced the number of units that remained vacant for over 60 days by 210, decreasing from 924 in Q3, to 714 in Q4.

TCHC Non-Rentable Vacancies

Within the TCHC portfolio, more than half of current vacancies are considered non-rentable for the reasons outlined below in Table 1.

Table 1: Reasons for Non-Rentable Vacancies

Reason	Description	Q3 2019	Q4 2019	Net +/-(-)
Revitalization Projects	Units associated with revitalization activities	1,332	1,493	161
Sale or Transfer of Building	Units pending sale or transfer to another operator	393	393	0
Uninhabitable/ Repairs	Units requiring capital investment	307	309	2
Operations	Units being used for operational activities where no alternative is available (i.e. office or amenity space)	190	132	(58)
Accessibility	Units associated with capital work related to accessibility	33	31	(2)
Units being held for transfers due to medical and safety risks	Time limited initiative associated with changes to the transfer process	0	0	0
Total		2,255	2,358	103

As detailed in Table 1, over half 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.

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 storage for capital work, or community programming where no common amenity space is available.

There are 55 units occupied by live-in superintendents in the contract-managed portfolio, as part of TCHC's agreement with their property management partners. In Q4, TCHC changed how they classify units occupied by live-in superintendents from non-rentable vacant units to occupied market units, seeing as units are being occupied for residential purposes. This resulted in a decrease in the number of units considered as non-rentable vacancies used for operations, as seen in Table 1.

Key advancements:

- The number of units being used for operational activities has decreased from 190 in Q3, to 132 in Q4.
- TCHC continues to implement 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.

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. As a result, the proportion of applicants with a shelter listed as their address that have been assigned the disadvantaged priority status on the waiting list, has increased from 40% in Q3 to 73% in Q4.

Key advancements:

- A review of the waiting list conducted in Q4 flagged 3,284 eligible applicants with a shelter listed as their address, of which 2,405 had been assigned a disadvantaged priority status due to homelessness.
- The proportion of applicants with a shelter listed as their address that have been assigned a disadvantaged priority has increased from 40% in Q3 to 73% in Q4.
- In Q4, there were 124 applicants housed from the waiting list that had priority status relating to homelessness, contributing to a total of 423 in 2019.
- Communications were sent to City-funded shelters to ensure all shelter clients are provided an opportunity to be placed on the centralized waiting list and assigned the disadvantaged priority status.

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 completed.

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

Legend	On Track 	Complete 
Monitoring 	Not Yet Initiated 	Delayed 

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

	Recommendation	Timeline	Status	Management Response	Actions Taken
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: 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	Q4 2019		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.	- In Q4, 3,590 applicants who have not made contact in the last 18 months were contacted using an automated calling tool as a reminder of the need to make contact with the City. - In 2019, SSHA contacted over 36,000 applicants who have not made contact in 18 months and made 28,810 applications inactive. - There are currently 92 households on the waiting list who have not been in touch for more than 24 months. This is down from 23,794 in Q1 2019.
	b. all attempts to contact each applicant are sufficiently tracked so that Access to Housing can identify all applications that should be	Q4 2020			

	changed to inactive status and subsequently cancelled				
	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	Q4 2019	✓		
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.	Q1 2020		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.	• 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 are being developed for implementation in 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.	Q4 2019	✓	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	• 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.

	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.	Q4 2020		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.	124 staff from 33 housing providers registered for the updated Waiting List Management training in Q4.
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.	Q3 2019	✓	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.	- SSHA recommended changes to the Province, including regulatory changes to the Housing Services Act. - In September 2019, the Province announced changes to regulation, which will require Service Managers to transition to one-offer rule no later than January 1, 2021.
5	Ensure that applicants understand the importance of choosing only those buildings they are willing to move into and the consequences of such choices.	Q4 2019	✓	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	- SSHA has reviewed and revised client letters and new standard communication was implemented to new applicants in Q4 2019. - Communication will be ongoing to support provincial legislative

				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.	changes as well as corresponding program changes 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.	Q3 2019	✓	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.	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.	Q4 2020		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.	This has been identified as a requirement for the new choice-based system being implemented in 2020.
8	Review additional steps to cost-effectively enhance communication with applicants, including reminders to keep their application information accurate and up-to-date.	Q1 2020		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.	- This has been identified as a requirement for the new choice-based system being implemented in 2020. - In Q4 2019, SSHA contacted over 3,590 applicants using an Automated Outbound Calling tool that reminds applicants who have not made contact with the City in over 18 months, to contact the City and confirm or update their information.

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.	Q1 2020		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.	• This has been identified as a requirement for the new choice-based system being implemented in 2020. • SSHA has implemented an Automated Outbound Calling tool that reminds applicants who have not made contact with the City in over 18 months, to contact the City and confirm or update their information. In Q4 2019, SSHA contacted over 3,590 applicants using this tool.
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	Q4 2020		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.	• 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.

	errors c. exception monitoring controls are developed, including regular reports to support the detection of errors or irregular activity.				
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.	Q4 2021	 	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.	To be initiated in 2020.
11	Establish local rules for: a. asset limits for rent-geared-to-income recipients	Q2 2020		Management agrees with this recommendation. SSHA will support the establishment of an	SSHA has initiated a jurisdictional scan to inform recommendations to

	b. total household income limits and prioritize access to rent-geared-to-income assistance based on household income.			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.	Council for Asset and Income limits 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.	Q4 2020		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.	Initial consultations occurred with Toronto Public Health to review current policies and assess planned changes through the implementation of the new choice based system.

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.	Q4 2021		Management agrees with this recommendation. 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.	To be initiated in 2020.
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.	Q4 2019		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.	3,284 clients were identified as having a shelter address listed on their waiting list applications in Q4 2019. - Of these applicants, 2,405 (73%) had been assigned a disadvantaged priority code (an increase from 40% reported in Q3). - A review has been conducted of SSHA's processes related to supporting vulnerable clients in the shelter system to secure RGI through the centralized waiting list. - Communications has been sent to City-funded shelters to ensure all shelter clients are provided an opportunity

					to be placed on the centralized waiting list and assigned the disadvantaged status.
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.	Q4 2019	✓	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.	• An Action Plan was submitted to the Province in October 2019, outlining a number of concurrent actions the City is taking to increase RGI subsidies and achieve service level standards. • City Guideline 2019-6 was issued on August 1, 2019, mandating an increase in the minimum number of RGI households housed by all mixed-income provincial program housing providers. • SSHA is meeting with TCHC on a bi-weekly basis to collaboratively work towards increasing service levels through decreasing vacancy loss, increasing the number of units in service and converting

				to increase public internet access for online information on City services for residents.	
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.	Q2 2020	 	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.	The City will implement new requirements for over-housed RGI tenants in accordance with recent regulatory changes to the Housing Services Act, which limits applicants to one housing offer, by January 1, 2021.
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.	Q4 2020		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.	This has been identified as a business requirement for SSHA's new waiting list management system, to be implemented in 2020.
20	In consultation with the City's Medical Officer of Health, to: a. identify the medical	Q4 2020		Management agrees with this recommendation. SSHA will consult with the City's Medical	SSHA began consultations with the City's Medical Officer in Q4 2019.

	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.			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.	
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	To be initiated in Q4 2019		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.	SSHA and TCHC have met to explore the feasibility of utilizing vacant units held for revitalization. Site visits have occurred and operating costs and related identified, which will inform a costs benefit analysis.

22	Implement and ensure compliance with procedures to oversee RGI households not selected from the CWL, including procedures and controls to: - 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 - ensure all current and future referral agreements are approved by the City - 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.	Q2 2020		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.	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.
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.			No management response.	- Communications has been sent to City-funded shelters to ensure all shelter clients are provided an opportunity to be placed on the centralized waiting list and assigned the disadvantaged status. - The City will implement new requirements for over-

					housed RGI tenants in accordance with recent regulatory changes to the Housing Services Act, which limits applicants to one housing offer, by January 1, 2021
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.	Q4 2020		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.	A review protocol and reporting mechanism are now in place to ensure that housing provider reviews are completed as scheduled.
24	Ensure the internal controls to review rent-geared-to-income housing providers are reviewed and strengthened to address weaknesses identified from the occurrence of fraud.	Q4 2019		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.	- A review protocol and reporting mechanism are now in place to ensure that housing provider reviews are completed as scheduled. - A new tool has been developed and is being used by staff to complete reviews and automate reporting.

25	Strengthen internal controls which ensure households on the centralized waiting list and those receiving rent-geared-to-income are eligible.	Q4 2020		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.	• A work plan to review eligibility assessments by Q2 2020 is currently being implemented. 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 be implementing these changes on July 1, 2020, the earliest possible date under the new regulations.
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.	Q4 2020		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	• SSHA has submitted a report to the Economic and Community Development Committee requesting authority for other City divisions to collect information for the purposes of determining RGI eligibility. This will enable Human Services Integration to increase service integration to include RGI subsidies.

				income verification processes for housing subsidy programs.	
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.	Q1 2020		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.	• Staff are reviewing common functions that could 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, are underway. • SSHA has submitted a report to the Economic and Community Development Committee requesting authority for other City divisions to collect information for purposes of determining RGI eligibility. This will enable HSI to increase service integration of RGI assistance.
30	Report to the October 16, 2019 meeting of the Economic and Community Development Committee on service improvements and	Quarterly		No management response. Reporting is ongoing, on a quarterly basis. This report meets this requirement in regards to Q4 2019.	

	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.); b. number of vacancies filled not using the centralized waiting list;				
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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				
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	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 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.	Quarterly		No management response. Reporting is ongoing, on a quarterly basis. This report meets this requirement in regards to Q4 2019.	
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	Q4 2020		Reporting will be brought forward to the Audit Committee by Q4 2020.	

	Housing Administration to engage Toronto's civic tech community on this project.				
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.	Quarterly		No management response. Reporting is ongoing, on a quarterly basis. This report meets this requirement in regards to Q4 2019.	
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.	Quarterly		No management response. Reporting is ongoing, on a quarterly basis. This report meets this requirement in regards to Q4 2019.	