



REPORT FOR ACTION

Delegation of Authority to Collect Information to Assess Eligibility for Rent-Geared-to-Income Assistance

Date: February 24, 2020

To: Economic and Community Development Committee

From: General Manager, Shelter, Support and Housing Administration

Wards: All

SUMMARY

The Human Services Integration (HSI) project is a cross-divisional partnership that integrates and streamlines the delivery of the City's key income-based assistance services: rent-geared-to-income (RGI) assistance, child care fee subsidies, and Ontario Works benefits. Program integration creates administrative efficiencies and improves service delivery for clients by consolidating multiple services into a single point of access and supporting a holistic view of client needs.

The first phase of the project was the establishment of an integrated Application and Support Centre (ASC) within the HSI Office, which will process applications and provide supports to clients across the City's three income-based programs. Full implementation of this system will require the collection of personal information required for various benefit applications.

City Council has delegated the City's power and authority as the designated Service Manager under the Housing Services Act, 2011 (the HSA) to the General Manager of the Shelter, Support and Housing Administration (SSHA) division, including the authority to collect personal information for the purposes of determining RGI eligibility.

Legal Services has advised that the HSA allows City Council to delegate its powers and duties as Service Manager to City staff in more than one division. However, a delegation cannot be made without City Council's explicit approval.

To further the City's objective of increasing service integration and simplifying the service experience for clients, this report recommends that City Council authorize the General Manager, SSHA, to delegate authority to City staff in other divisions to collect personal information for the purposes of determining eligibility for RGI, housing allowance benefits, or alternate forms of assistance administered by SSHA as the Service Manager.

RECOMMENDATIONS

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

1. City Council authorize the General Manager, Shelter, Support and Housing Administration, to sub-delegate to any person or class of persons employed by the City of Toronto, the General Manager's delegated authority to exercise the Service Manager's powers and duties with respect to the collection, use, disclosure, and safeguarding of privacy of personal information and for a person's access to their personal information for the purpose of determining eligibility for rent-geared-to-income, housing allowance benefits, or alternate forms of assistance authorized under the Housing Services Act, 2011 and eligibility for housing benefits under any other housing program administered by the General Manager for, or on behalf of, the City.

FINANCIAL IMPACT

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

EQUITY IMPACT

The City's income-based programs, RGI assistance, child care subsidies and Ontario Works benefits, are accessed by low-income individuals and families who face a variety of complex and intersecting challenges. This includes people from a range of equity-seeking groups, such as seniors, people experiencing homelessness, persons with disabilities, youth, and people who identify as LGBTQ2S+. Further program integration through the HSI project will help to better coordinate access and case management, enabling a holistic approach and continuum of services to support positive transitions throughout various life stages.

DECISION HISTORY

On July 22, 2003, City Council adopted the report, *Appointment of An Administrator for the Purposes under the Social Housing Reform Act, 2000 (SHRA)*, which authorized the appointment of an Administrator to perform all duties and exercise some powers as Service Manager under the SHRA. Through this report, City Council delegated the Commissioner of *Community and Neighbourhood Services* as Administrator, and the General Manager of SSHA as Deputy Administrator. When the position of Commissioner was eliminated, the authority became vested in the General Manager of SSHA. The delegated powers and duties under the SHRA continue under the Housing Services Act, 2011.

The staff report can be accessed at the following link:

[Appointment of an Administrator for the purposes under the Social Housing Reform Act, 2000](#)

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COMMENTS

Human Services Integration

An assessment of the delivery of income-based support programs revealed that clients and staff found the service system to be fragmented, difficult to navigate and inefficient, as clients accessing more than one service had to provide the same information multiple times with limited coordination across services.

The goal of HSI is streamlined and efficient access to key income-based support programs, particularly: Ontario Works, RGI, and Child Care Fee Subsidy.

A new shared services structure is being created for the HSI Office. This model lifts the access and intake functions with associated funding, from Children's Services, SSHA, and Employment and Social Services, and places them under a new coordinated operating unit.

The first phase of the HSI project involved the development of a single integrated Application and Support Centre (ASC) which launched in December 2019. This new service collects and processes eligibility information, including personal information, on behalf of all three divisions.

Current Authorities

Under the HSA, the City is the Service Manager responsible for funding and overseeing Toronto's social housing system, which entails the provision of 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 HSA and corresponding regulations prescribe the manner in which Service Managers can collect, store, disclose and share personal information for the purposes of determining eligibility and administering RGI subsidies.

Under the predecessor legislation, the SHRA, City Council delegated its powers and duties as Service Manager, to the General Manager of SSHA.

Legal Services has advised that the HSA allows the City to delegate its powers and duties as Service Manager to City staff in more than one division, however a delegation cannot be made without City Council's consent.

The required authorities exist for the HSI Office to collect personal information for the purposes of child care fee subsidies and Ontario Works benefits. However, similar authorities do not exist to collect personal information for the purposes of determining RGI eligibility.

As such, this report recommends that City Council authorize the General Manager, SSHA, the ability to sub-delegate authority to City staff in other City divisions for the

purpose of determining eligibility for RGI, housing allowance benefits, or alternate forms of assistance administered by the General Manager.

Conclusion

Centralizing eligibility review functions in HSI will simplify the service experience for clients, as having fewer access points will reduce the need for clients to provide the same information to multiple divisions.

Through the approval of the recommendation in this report, HSI will have the authorities necessary to continue to collect the personal information required for RGI eligibility determination as part of integrated service delivery.

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SIGNATURE

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