TORONTO

REPORT FOR ACTION

Selected Grants and Community Service Partnerships Extensions

Date: April 11, 2022

To: Economic and Community Development Committee

From: Executive Director, Social Development, Finance and Administration

Wards: All

SUMMARY

Throughout the pandemic, not-for-profit organizations, grassroots and resident-led groups have assumed vital leadership roles in responding to the urgent and often exacerbated needs of Torontonians who are vulnerable. As a key funder of groups and organizations across Toronto, Social Development, Finance and Administration provided over \$65 million in 2020 and 2021 to support the social service sector through ongoing and emergency grant programs.

In responding to the emerging situation brought forth by the pandemic, Social Development, Finance and Administration prioritized providing stable support for long-term funded groups while also targeting new and enhanced investments to address the City's reconciliation and equity goals and commitments to support already marginalized communities experiencing disproportionate impacts from the pandemic. The co-development of the Indigenous and Black-mandated Funding Frameworks with community leaders is representative of Social Development, Finance and Administration's commitment to a post-pandemic funding landscape that prioritizes support for Indigenous, Black-mandated and other equity-deserving groups. This report provides an update on the development of these two initiatives and details investments made to pilot approaches based on early findings of research designed to prioritize the voices of Indigenous and Black leaders.

Since 2018, Social Development, Finance and Administration has been on a path to increase demonstrable impact within the 176 organizations and 327 programs funded by the Community Service Partnerships grant program. Often considered core or backbone funding for a diverse group of Toronto not-for-profit organizations, stability of funding and services for Torontonians has been prioritized since the beginning of the pandemic. As we move into a post-pandemic environment, an extended year of continued funding is recommended as City staff work with sector leaders to begin to envision what a funding portfolio reflective of the City's goals and priorities will look like moving forward into the mid-2020's.

Finally, this report provides an overview of all grants approved with delegated authority since November 2020. These grants include those implemented to support the delivery Grants and Community Service Partnerships Extensions

of emergency programs to support marginalized Torontonians during the COVID-19 pandemic, grants to support the delivery of mental health services to those in neighbourhoods hardest hit by the pandemic, grants to support communities as they heal in the aftermath of violent incidents, as well as those designed to support youth and resident leaders to implement initiatives to support their communities.

RECOMMENDATIONS

The Executive Director, Social Development, Finance and Administration recommends that:

- 1. City Council delegate authority to the Executive Director, Social Development, Finance and Administration to allocate Community Service Partnerships funding until the end of the grant cycle in December 31, 2026.
- 2. City Council request the Executive Director, Social Development, Finance and Administration to report annually to the Economic and Community Development Committee on the grants approved through Recommendation 1.

FINANCIAL IMPACT

As the report seeks Council's delegated authority for the Executive Director, Social Development, Finance and Administration to allocate approved funding of \$24.98 million included in the 2022 Operating Budget, there are no financial impacts arising from this report in 2022 or in the future years. Specifically, funding of \$17.76 million has been allocated to the Community Service Partnerships program as per Appendix A. The remaining \$7.22 million will support Community Investment programs such as the Indigenous and Black-mandated Funding Frameworks, as well as other funding streams.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial impact information.

EQUITY IMPACT STATEMENT

Social Development, Finance and Administration works to advance social and economic equity, building strong and safe neighbourhoods for all Torontonians. The Community Funding Unit provides ongoing and short-term funding to Toronto-based, not-for-profit, grassroots and resident-led groups so that Indigenous, Black and equity-deserving communities have improved access to quality services and facilities.

With the City's support, community organizations, groups and residents deliver community-based programs and services to Torontonians that are socially and/or geographically isolated, living in poverty, and/or experiencing racism and other forms of discrimination. Further, the City is working to ensure that groups providing services to these vulnerable population groups are reflective of the communities they serve and are employing culturally safe and relevant practices.

Given the de-stabilizing impact of the COVID-19 pandemic on individuals, families and communities, the work of community-based not-for-profit organizations is critical. The City has repeatedly leveraged the expertise and services of organizations across communities throughout the pandemic to support residents in heightened vulnerability and recognize the need to maintain as much stability among organizations and communities this year as possible. Further, the Indigenous and Black-mandated Funding Frameworks created with community leaders are representative of Social Development, Finance and Administration's commitment to a post-pandemic funding landscape that prioritizes support for Indigenous, Black-mandated and other equity-deserving groups and works to rebalance historical underfunding of these groups.

DECISION HISTORY

On April 6, 2022 Toronto City Council approved the 2022 - 2032 Reconciliation Action Plan that will map and guide the actions that the City of Toronto and the Toronto Public Service will take to achieve truth, justice and reconciliation.

http://app.toronto.ca/tmmis/viewAgendaltemHistory.do?item=2022.EX31.1

On March 8, 2022 the Aboriginal Affairs Advisory Committee received an update on the development of the Indigenous Funding Framework.

http://app.toronto.ca/tmmis/viewAgendaltemHistory.do?item=2022.AA16.2

On February 17, 2022, Toronto City Council, in adopting the 2022 Operating Budgets for the Indigenous Affairs Office and Social Development, Finance and Administration, approved new and enhanced investment into the Indigenous Funding Framework and the Black-mandated Funding Framework.

http://app.toronto.ca/tmmis/viewAgendaltemHistory.do?item=2022.EX30.2

On May 5, 2021 Toronto City Council approved funding recommendations as a result of the Community Service Partnerships Renewal Process and received an update on work completed and in progress to increase funding access for Indigenous and Blackmandated groups and organizations.

https://www.toronto.ca/legdocs/mmis/2021/ec/bgrd/backgroundfile-165762.pdf

On November 25, 2020, Toronto City Council received an update on the Community Service Partnerships Renewal Process and an outline of proposed work regarding the development of Indigenous and Black-Mandated Funding Frameworks.

http://app.toronto.ca/tmmis/viewAgendaltemHistory.do?item=2020.EC17.4

On July 16, 2019, Toronto City Council approved the Community Service Partnerships Framework, as well as an appeals approach for the Community Service Partnerships funding application.

http://app.toronto.ca/tmmis/viewAgendaltemHistory.do?item=2019.EC6.20

On December 5, 2017, City Council adopted The Toronto Action Plan to Confront Anti-Black Racism, which outlined 80 actions and 22 recommendations for the City to undertake over five years with funding for required resources.

http://app.toronto.ca/tmmis/viewAgendaltemHistory.do?item=2017.EX29.11

On July 6, 2010, Toronto City Council adopted the City of Toronto Statement of Commitment to Aboriginal communities in Toronto.

http://app.toronto.ca/tmmis/viewAgendaltemHistory.do?item=2010.EX45.5

On February 2, 2010, Toronto City Council adopted the Community Partnership Strategy.

http://app.toronto.ca/tmmis/viewAgendaltemHistory.do?item=2010.CD30.2

The City of Toronto provides support to the public benefit sector through funding programs under the general authority for making municipal grants provided in Section 83 of the City of Toronto Act, 2006 (S.O. 2006, c.11). https://www.ontario.ca/laws/statute/06c11#BK103.

COMMENTS

1. Advancing Reconciliation and Equity through Community Investment

On October 27, 2020, City Council adopted both the City Manager's report, Towards Recovery and Building a Renewed Toronto, and the Toronto Office of Recovery and Rebuild's report, COVID-19: Impacts and Opportunities. These reports emphasize the need for the City to continue to invest in reconciliation and equity with a focus on Indigenous and Black communities. Since 2018, Social Development, Finance and Administration has been working with leaders from the Indigenous and Black communities to achieve two primary goals: i) to increase funding to Indigenous-led and Black-mandated not-for-profit organizations and grassroots groups; and ii) to improve granting practices to ensure funding is accessible and flexible and that groups and organizations are able to self-determine funding priorities and needs.

Indigenous Funding Framework

In partnership with a working group of leaders from Indigenous organizations, the development of the Indigenous Funding Framework which began in 2020 progressed throughout 2021, culminating with the allocation of \$625,000 to further pilot the "take what you need, leave what you don't" funding process developed by the Toronto Aboriginal Support Services Council to distribute emergency funding to Indigenous organizations to self-determine the COVID-19 response activities and supports needed within their communities. This approach and an update on work completed to date was presented to the Aboriginal Affairs Advisory Committee on March 8, 2022.

Through the <u>2022 budget process</u>, Social Development, Finance and Administration, in partnership with the Indigenous Affairs Office, were successful in securing an additional \$959,400 to support Indigenous groups and organizations to meet the needs of their communities. This commitment to increased funding and self-determination is enshrined within actions 6, 8, 9, 11, 12, 16, 17, and 23 of the <u>Reconciliation Action Plan</u> adopted by Toronto City Council on April 6, 2022.

Over the course of 2022, the working group will continue to develop the funding framework and will engage a consultant with the support of the Toronto Aboriginal

Support Services Council to lead community consultations to learn about the unique nature of Indigenous communities' hopes for a new funding relationship.

Through the leadership of the Toronto Grants Coordinating Committee, Social Development, Finance and Administration staff are working with other City funding divisions to collate historic and current funding allocations to identify gaps and opportunities for stronger relationships with Indigenous organizations. This information will also serve as a baseline to measure progress in meeting the City's reconciliation goals and commitments.

Black-mandated Funding Framework

In response to the Toronto Action Plan for Confront Anti-Black Racism, the Confronting Anti-Black Racism and Community Funding Units of Social Development, Finance and Administration are working to advance the development of a Black-mandated Funding Framework. Co-designed with an advisory committee of leaders from Black-mandated not-for-profit organizations and grassroots groups, the Framework responds to the demonstrated need to prioritize funding for the Black community through targeted supports and enhanced investments. This work is also outlined in the Toronto Action Plan to Confront Anti-Black Racism: Year Three Update report.

The following key milestones were achieved in 2021:

- Recruitment and establishment of the Black-mandated Funding Framework Advisory Committee with representatives of Black-mandated grassroots, emerging and established organizations. The committee met 10 times in phase one of the project.
- Three focus groups engaged leaders from grassroots, emerging and established not-for-profit organizations.
- A literature review pulled together information on grant making promising practices, as well as a cross-jurisdictional review of government granting programs.
- 15 key informant interviews with stakeholders, sector leaders and other funders were conducted.
- 47 members of the Black Resilience Cluster of the <u>Community Coordination Plan</u> responded to a survey to confirm initial findings from the research and consultation.
- Funding of \$625,000 supporting pilot projects for grassroots groups and established Black-mandated organizations as intermediaries to provide capacity building and/or trustee support.
- \$509,000 secured via the <u>2022 City budget process</u> to support enhanced granting in 2022.

The information gathered to date has informed the development of the draft Framework and the allocation of \$625,000 of funding to pilot the initial findings with the following three considerations:

Providing direct and unrestricted funding to Black-mandated groups: Research demonstrates that requirements to access funding through fully qualified trustees presents a barrier to Black-mandated groups and organizations that have been historically underfunded and thus prevented from establishing the organizational capacity required to receive funding directly. Nine groups in good standing with the City

of Toronto and who received TO Supports COVID equity funding through a trustee have been identified to receive self-directed funding from the City to address the needs of their community. Delta Family Resource Centre has been selected as an intermediary organization that will provide capacity building resources to these organizations to support further organizational growth and development.

Enabling an ecosystem of support for Black-mandated groups: Given historic inequities in the funding landscape, Black-mandated organizations have emerged in diverse forms and capacities supporting community in unique ways. Some organizations remain very grassroots for their entire existence, whereas others incorporate, receive charitable status or establish in other concrete ways. Research demonstrates that a combination of approaches that recognizes individual organizational development is essential and that adequate funding should be made available to support the diversity within this ecosystem. Nine groups will receive self-directed funding from the CEE Centre for Young Black Professionals to deliver projects in their community. These organizations will be supported by CEE as a trustee with capacity building resources and will be connected to the network of supports CEE has established to support the sector including the City-funded Black to the Future network and community of practice.

Developing Afro-centric evaluation and reporting tools: The UBUNTU: African Assessment Model piloted by the Confronting Anti-Black Racism Unit to deepen monitoring and evaluation of community partnerships will be employed to decolonize evaluation and use community defined metrics to assess impact.

The development of the Black-mandated Funding Framework will continue in 2022 with the recruitment of a phase two advisory committee, community consultations, monitoring and evaluation of the pilots, and further refinement of the definitions, pillars, principles and draft approaches into the final Framework in early 2023.

2. Community Service Partnerships Funding Update

In May 2021, Toronto City Council <u>approved</u> a recommendation to extend all current Community Service Partnerships agreements for 2021 and 2022. This recommendation was made after a three-year renewal process that resulted in the development of the <u>CSP framework</u>. All currently-funded organizations were recommended for two-year extensions in recognition of the vital role the not-for-profit sector has and continues to play in supporting Torontonians throughout the pandemic.

Given the continued impact of COVID-19 on communities, particularly communities experiencing inequities in health outcomes and social impacts, Social Development, Finance and Administration will extend all funding agreements for Community Service Partnerships organizations in good standing until the end of 2023 to support the stable delivery of services to Torontonians. Social Development, Finance and Administration will report back on the funding allocation on an annual basis through the four year funding cycle ending in 2026.

Alongside this extended funding, staff will work with the not-for-profit sector to give further consideration to several trends identified during the Community Service Partnerships renewal process.

- Some organizations did not clearly demonstrate with verifiable data that they are serving Torontonians who are vulnerable, a priority for the funding stream.
- Some organizations did not demonstrate through program indicators that they are likely to achieve the shared outcomes that are the basis of the Community Service Partnerships Framework.
- Given the very long-term nature of most of the agreements, current trends that impact the social determinants of health for Torontonians who are vulnerable (e.g. immigration, health and geography) may not be adequately reflected in the Community Service Partnerships portfolio.
- Representation of Indigenous and Black-mandated organizations within the portfolio at 2% and 10% respectively does not reflect reconciliation and equity priorities.

During the extension period, Social Development, Finance and Administration remains committed to building reconciliation and equity infrastructure through its funding allocations and will continue working with funded organizations to ensure alignment with the Community Service Partnerships logic model and shared outcomes, and will support organizations to improve measurement and evaluation capacity.

As staff begin to plan for the post-pandemic funding landscape, Social Development, Finance and Administration will focus on funding can be leveraged in the future to more closely align with the City's priorities and commitments to reconciliation and equity. With the demand for Community Service Partnerships funding being both robust and persistent, and in consideration of how much the not-for-profit sector has grown and changed over the past 24 years, increasing demonstrable commitment to reconciliation and equity requires a re-examination of funding streams and the organizations receiving long-term City funding.

3. Delegated Authority Report Back

To ensure that grant funds are allocated each year to maximize benefit to communities, City Council provides delegated authority for the Executive Director, Social Development, Finance and Administration to:

- Approve grant recipients of the Youth Violence Prevention Grant and Community Crisis Response Fund to ensure timely response to violence and trauma in neighbourhoods and to support violence prevention efforts;
- Approve allocations to Indigenous and Black-mandated organizations in support of the funding frameworks in development;
- Allocate funds to support funding streams or individual projects that respond to emerging community needs, such as the Social Development Plans in Alexandra Park, Lawrence Heights and the Downtown East;
- Approve recipients of investment funding programs;
- Disburse funding to new initiatives approved by Toronto City Council.

From 2020 to 2022 to date, delegated authority supported the responsive and nimble allocation of grants to address urgent and unmet needs as a result of the COVID-19 pandemic. Table 1 to Table 3 summarize the grant programs where delegated authority was used by year.

Table 1: 2020 Grant Programs Allocated by Delegated Authority

2020 Grant Programs	Grant Recipients	Approved Amounts Allocated
Capacity Building	6	\$351,000
Community Crisis Response	13	\$140,984
Innovation Funding	19	\$1,190,468
Innovation Funding Reallocation	1	\$65,000
Projects and Events	20	\$1,306,180
TO Supports	34	\$3,122,010
Youth Violence Prevention	1	\$11,132
Neighbourhood Grants	1	\$38,000
Community Service Partnerships Ongoing Reallocation	1	\$14,000
Community Service Partnerships	4	\$435,012

Table 2: 2021 Grant Programs Allocated by Delegated Authority

2021 Grant Program	Grant Recipients	Approved Amounts Allocated
Capacity Building	11	\$461,000
Community Crisis Response	14	\$279,460
Community Service Partnerships	1	\$60,000
Projects and Events	18	\$1,226,000
Identify 'N Impact	7	\$244,000
Innovation	16	\$1,577,000
TO Supports Mental Health	28	\$2,003,000
Neighbourhood Grants	11	\$250,000
Youth Violence Prevention	17	\$2,718,151

Table 3: 2022 Grant Programs Allocated by Delegated Authority

2022 Grant Program	Grant Recipients	Approved Amounts Allocated
Community Crisis Response	8	\$128,584
Community Service Partnerships One-time Funding	1	\$96,000
TO Supports Mental Health Grants	24	\$500,000
Innovation Food Access	1	\$75,000

Neighbourhood Grant	1	\$50,000
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A full list of all grants approved, grant recipients and related wards via delegated authority between November 2020 and March 2022 is included in Appendix B.

4. Reconciliation and Equity-focused Pandemic Supports

In March 2020, under the guiding framework, TO Supports: COVID-19 Equity Action Plan, the City of Toronto partnered with community agencies to connect residents to resources, services, programs, and support during the COVID-19 pandemic. To support community agencies in providing nimble, critical responses, Social Development, Finance and Administration created new approaches including the following funding envelops:

- TO Supports Investment Fund
- Mental Health Grants
- Vaccine Engagement Team Grants

Further details on each grant is provided below.

TO Supports Investment Fund

The exacerbated impacts of the COVID-19 pandemic on Indigenous, Black and equity-deserving communities has been well documented. This impact was considered when Social Development, Finance and Administration created the TO Supports Investment Fund. Funding was made available from three combined sources: a 20% carve out of the provincial Social Services Relief Fund provided to the City; the Canadian Medical Association Foundation through the Federation of Canadian Municipalities; and private donors.

Leveraging the integrated networks with local organizations built by the <u>Community Coordination Plan</u>, TO Supports prioritized funding for Indigenous, Black and equity-deserving groups and organizations based on real-time data emerging from the cluster tables, 211/Findhelp, and the Emergency Operations Centre. Between June and December 2020, allocations of \$9.7 million were made across the TO Supports themes of food access, mental health, housing/homelessness, community safety and wellbeing, family support, income support, social connection, and community sector support. Given the interconnectedness of these themes, many grants addressed multiple priorities.

Table 4: TO Supports Investments

Theme	Total Allocations	Allocations to Indigenous organizations	Allocations to Black-mandated organizations
Food Access	\$4,518,798	\$50,000	\$1,480,634
Mental Health	\$903,000	\$110,000	\$293,000
Income Support	\$150,000		

Theme	Total Allocations	Allocations to Indigenous organizations	Allocations to Black-mandated organizations
Social Connections	\$960,099		\$172,000
Community Sector Support	\$270,000		
Family Support	\$220,000		\$220,000
Housing/Homelessness	\$193,670	\$100,000	
Multiple Priorities	\$2,512,121	\$1,075,000	\$1,387,121
Total	\$9,727,688	\$1,335,000	\$3,552,755

Over \$1M of the funding allocated to Indigenous organizations was provided to the Toronto Aboriginal Support Services Council to pilot the "take what you need, leave what you don't" funding model. With this funding, members of the Toronto Aboriginal Support Services Council and others within the Indigenous not-for-profit sector were able to self-determine the supports needed within their communities and served over 1,900 community members. Funding was allocated to a range of activities including:

- Food, household items and supplies for individuals and families
- Funding for organizational staff to respond directly to community needs including adding staffing, training, Elder/artist compensation, and outdoor space rental for ceremony
- Health and safety supplies and personal protective equipment

Mental Health Grants

As part of the <u>2021 budget process</u>, Social Development, Finance and Administration received \$2M to extend the TO Supports Investment Fund to assist community groups and non-profit organizations addressing mental health issues, with an emphasis on supporting individuals in the neighbourhoods hardest-hit by the COVID-19 pandemic. These investments extended, enhanced and supplemented funding previously provided under the TO Supports Investment Fund in support of the <u>COVID-19 Mental Health Support Strategy</u>.

One-time funding of \$2M was allocated to 27 community organizations to provide streamlined access to critical mental health support for 52,387 Torontonians including children and youth, seniors, frontline workers, and those with intersectional identities such as Indigenous, Black, persons with disabilities and 2SLGBTQ+. Of this funding, \$325,000 (16%) was provided to Indigenous organizations with the support of the Indigenous Affairs Office and \$670,000 (34%) was provided to Black-mandated organizations with the support of the Black Resilience Cluster.

Based on data collected throughout the pandemic to better understand the mental health needs of Torontonians and existing service gaps, a number of funding priorities were identified. Table 2 lists these priorities as well as outcomes achieved by a funded organization under each priority.

Table 2: TO Supports Investment Fund - Mental Health Grants Priorities and Outcomes

Funding Priority	Selected Outcomes
Support for existing Mental Health Support Strategy partners	Caribbean African Canadian Social Services (CAFCAN) supported 220 Black men through mental health support groups and 235 frontline workers in a bi-weekly support group designed to assist Black frontline workers impacted by the pandemic.
Support for Indigenous organizations	Native Women's Resource Centre of Toronto supported 30 women and children to receive on the land teachings, medicine workshops, traditional sharing and teaching circles, as well as traditional counselling (including tools for stress management).
Support for agencies serving Black Torontonians previously funded under TO Supports	Across Boundaries engaged 242 young fathers and children from African, Caribbean, and Black communities in the Fatherhood Initiative, which provides interactive parenting programs, resources, mentoring services and advocacy supports.
Support for front-line workers and their families in individual and group formats	Breakaway Community Services provided 50 frontline Harm Reduction workers impacted by substance use related deaths (SURDs) with rapid response phone and text supports to address traumatic grief, loss and burn out. Referrals were made to group and 1:1 supports within Breakaway's Grief, Loss and Wellness Initiative.
Organizations addressing intimate partner violence	The Toronto Rape Crisis Centre/Multicultural Women Against Rape provided support groups for 14 young Black survivors of intimate partner violence (IPV), a workshop series around mental health, wellness, and safety planning for 10 individuals impacted by IPV, and a chat/text crisis service for 177 individuals.
Organizations serving Torontonians with disabilities	Black Coalition for AIDS Prevention provided a peer- support program that served 360 African Caribbean Black LGBTQ+, HIV positive, differently abled community members, and engaged an additional 238 individuals as a result of increased accessibility measures (American Sigh Language interpretation) at all community facing events.

Funding Priority	Selected Outcomes	
Organizations supporting 2SLGBTQ+ youth	Lesbian Gay Bi Trans Youth Line aimed to engage 50 2SLGBTQ+ youth (who volunteer and support 3,000+ people through the HelpLine) and an additional 48 youth in a multi-week training series focused on community-based mental health skills.	

With additional support from the Social Service Relief Fund, \$500,000 is being invested to extend TO Supports Mental Health grants for part of 2022. Three organizations declined extension funding, which was reallocated to provide additional support to the three Indigenous organizations in the funding portfolio.

Vaccine Engagement Team Grants

The Community Immunization Engagement and Mobilization Plan builds on the City's TO Supports equity measures by leveraging community expertise and partnerships to facilitate and promote vaccine uptake across all of Toronto. Vaccine Engagement Teams are a key component of the plan and support equity-deserving groups disproportionately impacted by COVID-19, as well as other racialized communities that have historically experienced systemic oppression and exploitation from government and medical institutions.

In March 2021, Social Development, Finance and Administration launched the COVID-19 Vaccine Engagement Teams Grant to recruit and select consortiums of community organizations, grassroots groups, resident-led groups and faith-based organizations/groups to implement immunization mobilization plans for communities most affected by COVID-19. This grant call leveraged the partnerships created through the Community Coordination Plan and built on equity data analyzed by Toronto Pubic Health.

A total of 19 applications were received from 12 community clusters, with 14 organizations recommended to act as consortium leads across 10 geographic and two population specific (newcomer and Black Resilience) clusters. Additional population-based clusters were added to respond to emerging needs and trends, for a total of seven population-based consortiums by the end of 2021. Since work began in April 2021, the following outcomes have been achieved:

- Over \$9.5 million in funding has been provided to Vaccine Engagement Teams, mobilizing over 200 health, community and faith-based organizations to support this work.
- Over \$1.7 million has been provided to Indigenous organizations to self-determine culturally-appropriate engagement strategies.
- Over 600 Community Ambassadors have been mobilized to build vaccine confidence, provide access to vaccine resources, and amplify public health messaging across their networks.
- Vaccine Engagement Teams have engaged over 1.5 million Torontonians

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SIGNATURE

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ATTACHMENTS

Appendix A: List of Organizations Approved to Receive Community Service Partnerships Funding in 2022

Appendix B: List of Organizations and Grant Recipients Approved with Delegated Authority