



TO: **Executive Committee**

DATE: December 09, 2025

RE: Status Update: Implementation of Ombudsman's Recommendations and Council Directives on the City's Response to a Vital Services Outage in a Multi-Tenant Home (EX28.2)

Dear members of the Executive Committee,

Thank you for the opportunity to speak to you today on the implementation of Ombudsman's Recommendations and Council Directives as these relate to emergency responses to Multi-Tenant House closures.

My name is Pablo Escobar, and I am the Chair of the Toronto Alliance To End Homelessness' System Barriers to Housing Working Group. I also worked as Woodgreen's Rooming House Policy Worker and Rooming House Emergency Response Worker, tasked with editing and implementing the Rooming House Emergency Response Plan (The Plan).

The Toronto Alliance to End Homelessness (TAEH) is a community-based collective impact initiative committed to ending homelessness in Toronto. Our network includes non-profit organisations that support those living with homelessness as well as affordable and supportive housing developers, property managers, and landlords. We also serve as the City's non-Indigenous Community Advisory Board, and we co-chair the Toronto Housing and Homelessness Service Planning Forum with TSSS and the Housing Secretariat.

TAEH's Systems Barriers to Housing Outcomes Working Group investigates identified barriers in our systems to housing outcomes for people experiencing, or at risk of, homelessness. The group gathers and documents these barriers and creates evidence-based recommendations for system changes.

Overall, we support the City's adoption of the 27 recommendations made by the Ombudsman following the City's response to a vital service emergency in a Multi-Tenant House.

We also support the transfer of responsibilities for emergency responses in rooming houses from the defunct Rooming House Emergency Response Plan to the City and specifically EPIC.

There are several essential pieces, however, to emergency responses that were previously in the Rooming House Emergency Response Plan (The Plan) that have not been implemented by the City. These include responding to landlord-initiated closures, responding to imminent closures beyond Vital Service Emergencies, open referral process for tenants and educational outreach to tenants focusing on emergency responses to closures. The old Plan also did not include a means test.

As described in the City Report, the current emergency response is triggered by City initiated closures. The Rooming House Emergency Response Plan not only responded to City initiated closures, but all closures of rooming houses for whatever reason. These included landlord-initiated closures such as illegal evictions and renovictions. This type of response is even more important currently given the risk of closures and displacements due to the implementation of the New Regulatory Framework for Multi-Tenant Homes and the increased focus on enforcement in 2026.

We strongly support the expansion of the current emergency response by the City to include imminent closures due to vital service emergencies. The old plan, however, responded to all imminent closures. This is especially important when dealing with landlord-initiated closures as there may be an opportunity to stop the closure and subsequent tenant displacement. This would also fall within the City's stated priorities. The City report before you today states that "prevention of eviction and displacement are city wide

priorities...[that]...represent a cost-effective response to risks of homelessness". The expansion of the scope of imminent closures beyond vital service emergencies would support the city in meeting this priority.

The old Plan could also be triggered by tenants allowing for immediate responses to sudden and imminent closures. To empower tenants to do so, a flyer describing the program, how to trigger it and explaining emergency responses was developed by previously displaced tenants. This flyer was distributed through proactive outreach to rooming houses across the City.

Finally, the previous plan did not include an official means test. Following an assessment, supports were provided to all tenants based on identified areas of need. To be sure, many individuals with more resources did not require support. Others required limited support such as help finding long-term accommodation before temporary arrangements expired.

Recommendations:

The TAEH recommends that the current response be brought into alignment with the previous Rooming House Response Plan. To do so we recommend the following:

- Expand the scope of the City's response to include landlord initiated closures
- Expand responses to imminent closures to include landlord-initiated closures.
- Provide a mechanism so tenants can trigger a response.
- Implement an educational outreach campaign to rooming house tenants describing emergency responses to rooming house closures and how to report these.

Also given the risk posed by the implementation of the new licensing framework we support that the response be triggered by the loss of dwelling rooms as opposed to being triggered only by a sudden or

imminent closure of the whole house. This is both an expansion of current parameters and those of the original Rooming House Emergency Response Plan. This expansion is needed as there is a concern that due to new zoning requirements, landlords may minimize the number of rooms in their properties to comply, leading to tenant displacements. Where currently and in the past the response was triggered by the closure of a whole rooming house, the current environment requires a more flexible approach.

Finally, given the expansion of the scope of the emergency response that we are suggesting, we strongly recommend that the funding match the increased scope for tenant outreach and for EPIC to ensure that required resources are in place to effectively respond to closures of Multi-Tenant Houses.

Thank you,

Pablo Escobar, Chair
System Barriers to Housing Outcomes Working Group, TAEH