

HS7.3 - Mapping Resources for Tenants at Risk and Update on the Situation Table for Housing-at-Risk

Submission by Melissa Goldstein

Summary

Current data from the FMTA, which is funded by the City to do outreach to multi-tenant house (MTH) tenants in MTH that have received an “order to comply” from MLS, suggests that roughly half of all the tenants in unlicensed MTH that FMTA outreach staff have visited are facing eviction, or have already been evicted. Given the city’s lack of available deeply affordable rental housing, many of these tenants are at risk of homelessness, or are already homeless.

Emergency programs and supports are not only critically needed to mitigate the negative effects on tenants of the City’s MTH licensing framework and its significant ramping up of MTH licensing enforcement, but to realize the City’s commitment under the Toronto Housing Charter to ensure that City policies and programs are designed to avoid residents from being made homeless. None of the programs and supports detailed in the City’s presentation today meet this need.

In the absence of these programs and supports, the MTH Legalization Framework *undermines* tenants’ right to housing instead of helping further realize tenants’ right to housing, as MTH tenants, already vulnerable and marginalized, have little to protect them from homelessness in situations where increased enforcement **(and the mere threat of enforcement)** results in tenant displacement.

The STAR table does not do the critically necessary work that staff promised the HART table would do. Staff’s presentation makes it clear that the EPIC program **does not** provide rehousing support to tenants losing their homes as a result of MTH closures, leaving a significant number of gaps in terms of tenant supports and program coordination, monitoring, evaluation and revision that staff have not acknowledged.

Recommendations:

1. Ensure the responsibilities that were to be undertaken by the HART Table related to program coordination, data collection, monitoring, evaluation, revision, and prevention of tenant displacement/homelessness and affordable housing loss have been assigned to appropriate City staff along with effective oversight.
2. Restart and properly fund and resource an updated Emergency Rooming house Response Program.
3. Fund portable housing benefits to be distributed specifically to displaced MTH tenants via the Emergency Rooming House Response Program and other tenant support agencies.
4. Fund proactive displacement prevention workers to do outreach to all unlicensed MTH tenants, and not just tenants of MTH that have received an “order to comply.”
5. Require monthly reporting on policy impact and program effectiveness metrics to allow the tracking of impacts on tenants and the supply of affordable housing and timely interventions.

The Housing Secretariat must be held accountable for failing to uphold the Toronto Housing Charter and do the work it committed to do and which Council directed it to do to protect the City’s most vulnerable tenants from housing emergencies that result from City policy. Delays in addressing the immediate harms being caused to vulnerable MTH tenants are unacceptable.

Dear Housing Rights Advisory Committee members,

Current data from the FMTA, which is funded by the City to do outreach to multi-tenant house (MTH) tenants in MTH that have received an “order to comply” from MLS, suggests that roughly half of all the tenants in unlicensed MTH that FMTA outreach staff have visited are facing eviction, or have already been evicted. Given the city’s lack of available deeply affordable rental housing, many of these tenants are at risk of homelessness, or are already homeless.

The City committed to a policy that would not render current MTH tenants homeless, consistent with its commitment to uphold the principles of Toronto’s Housing Charter.

Staff proposed the establishment of a HART (Housing At Risk) Table in multiple staff reports as a key measure to realize these commitments. In many staff reports related to MTH licensing and the City’s renoviction policy, staff outlined the role and responsibilities of the proposed HART table¹.

These responsibilities include:

- coordinate interdivisional planning and responses to mitigate the loss of affordable and mid-range rental housing and support tenants who face evictions;
- make recommendations to the City Manager concerning policy or program changes to address systemic and structural gaps that contribute to the loss of affordable and mid-range rental housing, and housing precarity for tenants;
- review "data gaps" in City processes with respect to obtaining information and propose operational changes to improve data collection;
- coordinate emergency relocations and supports for tenants who have been evicted—not just complex cases;
- mitigate the loss of units or transition tenants to alternative housing solutions, if relocation is the only option—not just complex cases;
- proactively plan to attempt to mitigate potential displacement caused by the MTH legalization framework;
- monitor the implementation of the MTH Legalization framework on potential tenant displacement;
- monitor the impacts of the MTH Legalization framework throughout implementation, including tracking data and developing metrics on impacts on tenants, housing affordability, and evictions;

These proposed HART table responsibilities represent critically important work that must be done to ensure the City meets its commitment to preventing and protecting tenants from displacement and homelessness and preserving the existing supply of affordable rental housing.

As staff note in today’s presentation, the STAR table will not be doing any of this aforementioned work.

Additionally, the staff presentation is clear that the EPIC program does not provide rehousing support to tenants losing their homes as a result of MTH closures, contradicting what staff told the Ombudsman’s investigators and what Doug Rollins claimed at the last HRAC meeting in response to the Ombudsman’s report.

This leaves several significant gaps in tenant supports that staff are not acknowledging here:

- There is no support available for tenants in need of emergency relocation support aside from a 2-week hotel stay via TEM and the Red Cross, and no one coordinating emergency relocations and supports for tenants who have been evicted, except in “complex cases”

¹ Submission HS6.3 - Update from the Deputy Ombudsman (Housing)

- There is no mitigation of the loss of units or support to help tenants transition to alternative housing solutions, if relocation is the only option for tenants who don't meet "complex case" criteria
- It is unclear if anyone is coordinating interdivisional planning and responses to mitigate the loss of affordable and mid-range rental housing and support tenants who face evictions;
- It is unclear if anyone is tasked with making recommendations to the City Manager concerning policy or program changes to address systemic and structural gaps that contribute to the loss of affordable and mid-range rental housing, and housing precarity for tenants;
- It is unclear who is tasked with reviewing "data gaps" in City processes with respect to obtaining information and proposing operational changes to improve data collection;
- It is unclear if any proactive planning to attempt to mitigate potential displacement caused by the MTH legalisation framework is taking place
- It is unclear if anyone at the City is monitoring the implementation of the MTH Legalization framework on potential tenant displacement. The City has not yet modified Central Intake's call screening process to enable the identification of MTH tenants seeking shelter or supports, which was one metric for tracking impact that advocates identified.
- It is unclear if anyone at the city is monitoring the impacts of the MTH Legalization framework throughout implementation, including tracking data and developing metrics on impacts on tenants, housing affordability, and evictions. We have heard from staff that the only data they have on evictions is from the FMTA, which is not currently collecting rental rate data from tenants. It is unclear how staff would track the impact of this framework on rental housing affordability without access to MTH rent data.

Emergency support to prevent tenant displacement and homelessness is needed

A lot of evictions can't be prevented and tenants who are facing unpreventable displacement need rehousing support. The supports currently available to MTH tenants and detailed in today's staff presentation are largely inappropriate for MTH tenants who are a) highly vulnerable and who often don't have English fluency or the capacity to advocate for themselves effectively, and b) facing eviction for landlord-caused reasons, not for rent arrears or problematic behaviour. For example, the Rent Bank and EPIC cannot help a tenant who is losing their housing because a landlord is closing the house or rooms as a result of new licensing requirements/fear of enforcement.

With the approval of the MTH Legalization Framework, City Council and staff committed to explore ways to enhance the City's approach to emergency relocations, as the issue of likely homelessness in situations where the displacement of MTH tenants can't be prevented and the lack of rehousing support for these tenants have been known issues for decades.

This gap in support for MTH tenants at risk of homelessness is much worse now that the City's Emergency Rooming House Response Plan is no longer operational. A report on an enhanced approach to emergency relocations was originally due in November 2021 is now expected in October or November 2025.

The report expected in 2021 was to:

- Clearly identify roles and responsibilities between City divisions to improve the effectiveness and timeliness of the City's response;
- Improve tenant communications during and following the emergency event;
- Develop protocols to ensure that relevant support is immediately available, ideally on-site, to support tenants in their emergency housing needs when evacuation orders are issued; and Develop resources and information to immediately assist tenants and Operators when there is a need for an emergency evacuation, including the protection of tenant Rights.

The City's Tenant Advisory Committee (TAC) was to be consulted as this new protocol is developed to ensure the tenant perspective is included, along with considerations raised during these consultations, but as of September 2025, TAC has not been consulted. We hope that the expected report covers the ground that Council directed staff to cover.

The Ombudsman recommended that the City consider whether to update or replace the Rooming House Emergency Response Plan. As they said in their report, "I believe the RHERP would be a useful blueprint for developing an updated, coordinated plan to support multi-tenant home tenants at risk of displacement, while prioritizing tenants' human right to adequate housing and the preservation of affordable housing in the City."

I agree with this assessment. An emergency program and protocols for tenants facing sudden or imminent displacement should be designed and funded solely for that purpose and be operated independently by a non-profit agency, but be integrated with the implementation of the MTH Legalization Framework.

Given the effectively non-existent supply of deeply affordable and affordable rental housing available to displaced MTH tenants, it is critically important that tenants are provided with the financial support necessary to access alternate housing and avoid homelessness.

"Advocating for" housing benefits and income supports will not prevent these tenants from ending up homeless. The City needs to step up and provide rent supplements to help tenants who are losing their housing as a result of City policy. If the City can find \$1.2m a year to enforce a ban on protesting (which could have funded 2,400 portable housing benefits), then the City can find the money to keep these vulnerable tenants housed and out of the shelter system.

Recommendation:

- Update and restart a properly funded non-profit run Emergency Rooming House Response Plan that has access to portable housing benefits to help MTH tenants access alternate housing.
- Create a City of Toronto-funded portable housing benefit specifically for displaced MTH tenants at risk of homelessness.

Proactive tenant support is needed:

It appears that FMTA outreach happens too late—by the time they arrive at a MTH where MLS has already issued an "order to comply," many tenants have already been evicted, rooms are vacant, and houses have already been closed and have been put up for sale.

We've seen in Parkdale and around York University that proactive eviction prevention, where door-to-door outreach is undertaken proactively in high risk areas, can be very helpful in preventing the eviction and homelessness of vulnerable tenants. However, the density of vulnerable MTH tenants in Parkdale and around York University in relatively small geographic areas is very high, making it practically possible for a small number of outreach workers to reach a high percentage of the MTH tenants in the area via door-to-door outreach. It's not possible to scale that approach across the whole city, given that in some areas MTH properties are very spread out. Still, there are neighbourhoods with much higher densities of unlicensed MTH than others, and funding for neighbourhood-specific proactive outreach to MTH tenants in languages common in that neighbourhood would be helpful.

There need to be a lot more outreach workers who can connect with these tenants and offer appropriate support.

Recommendation:

- Fund proactive displacement prevention workers to do proactive outreach to all unlicensed MTH tenants, and not just tenants of MTH that have received an “order to comply,” starting with neighbourhoods with the highest density of unlicensed MTH.

Diligent and transparent tracking of policy impacts and program effectiveness is needed:

I understand that a number of long-awaited reports related to MTH are expected at Planning and Housing Committee next month. Although staff were supposed to report back in year one of implementation and it is now year three, this is the first report back on this policy framework, a framework that potentially puts both the city’s last remaining privately owned deeply affordable housing and its most vulnerable tenants at risk.

Given the vulnerability of the affected residents and the delay and inconsistency in getting information from staff, it is important that a) staff report on the following metrics in their upcoming report and b) going forward, staff produce monthly reports via a data dashboard on these metrics to allow a more timely response/intervention by staff, agencies, and advocates:

Scope of enforcement and tenant support activities:

- Number of MTH properties (and the number of MTH rooms in each) visited by:
 - MLS
 - Toronto Fire
 - FMTA

Tracking tenant and housing affordability impacts:

- Number of tenants visited by FMTA
- Number of tenants visited by FMTA facing eviction
- Rental rates of tenants (a) facing eviction & b) not)
- Incomes of tenants (a) facing eviction & b) not)
- Number of MTH properties in each neighbourhood (where there are MTH properties)
- Number of rooms are currently being rented vs number legally allowed
- Number of a) for-profit and b) non-profit MTH and MTH rooms being closed
- Number of MTH tenants calling Central Intake seeking shelter
- Number of MTH tenants calling 311 and Central Intake seeking support
- Number of MTH tenants a) seeking and b) receiving support via each of the following: Rent Bank, TTSP, EPIC, Housing Hubs, STAR table; number of these tenants who have a) lost their housing, b) were prevented from losing their housing, and c) were successfully rehoused in permanent housing; the number of affordable rental rooms kept open by the program; the number of affordable rental rooms closed in spite of the program.
- Number of MTH tenants who have lost their housing
- Number of MTH tenants permanently rehoused
- Number of MTH tenants evacuated by Toronto Fire Services
- Number of MTH tenants referred to TEM for support
- Number of MTH tenants referred to Toronto Emergency Management for support

Tracking program effectiveness:

- Number of MTH identified city-wide
- Reasons for non-compliance (number of MTH for each reason)
- Number of MTH applying for rezoning/minor variances
- Number of MTH applying for licenses
- Number of MTH that have become licensed for the first time
- Number of previously licensed MTH that have become licensed
- Number of MTH applied for renovation funds
- Number of MTH received renovation funds

Recommendation:

- Report on the above metrics in upcoming staff reports reviewing MTH licensing framework implementation; and
- Produce monthly reports via a data dashboard on the above metrics to allow a more timely response/intervention by staff, agencies, and advocates.

Melissa Goldstein is an affordable housing and homelessness policy researcher and advocate, member of the City of Toronto's Tenant Advisory Committee, member of the Toronto Alliance to End Homelessness' System Barriers to Housing Working Group, member of the Multi-Tenant Housing Advocacy Group, and a resident of Ward 9.