



**Attn: Planning and Housing Committee**

COTA Health (Cota) appreciates the City's consideration of possible amendments to Multi-Tenant Houses (MTH) Regulatory Framework. While we support the move toward a declaration approach pertaining to A(2), what you are asking through the inclusion of (e) is a declaration that continues to miss the mark because it still requires that all directors of the corporation undergo a Vulnerable Sector Check without an underlying bona fide reason. For example, the Directors of the Corporation at Cota are the Board and vice versa. They meet virtually 6-7 times a year and do not work at or provide direct support to any of the tenants of the site to be licensed. The nature of their duties does not involve any contact with/support to tenants and certainly does not result in the formation of a direct relationship of trust or authority over vulnerable people. As such the nature of their positions do not meet the eligibility criteria for the police to even conduct a Vulnerable Sector Check.

In our opinion, we would suggest you amend section 575-2.2A(2)(b)[1] to read as follows:

[1] When the operator is a corporation, a person authorized to bind the corporation may submit a declaration in a form satisfactory to the Executive Director confirming that:

[a] the corporation directly employs or contacts personnel to manage the operations of the site on its behalf and that those personnel:

- i. Are at least 18 years of age; and
- ii. Hold an Ontario Secondary School Diploma, or evidence of equivalent standing as determined by Ontario's Minister of Education; and
- iii. Have at least three years employment experience in work comparable to the operations of a personal care multi-unit house

[b] the corporation has a policies and procedures in place to ensure that all other employees, volunteers, students, contracted agents or other workers assigned to work at the site as part of their regular duties, have undergone a Vulnerable Sector Check, the results of which have been deemed satisfactory in the corporation's judgement, to safeguard the wellbeing of the tenants residing and receiving personal-care at the site

[c] the corporation will maintain satisfactory documentation that Vulnerable Sector Checks were indeed completed for all active employees, volunteers, students, contracted agents or other workers assigned to work at the site as part of their regular duties

[d] the corporation will provide satisfactory evidence of the policies and procedures described in [a], [b], [c] at any time upon request

Sincerely,

Paul Bruce,  
Chief Executive Officer

**SUPPORTING PEOPLE LIVING WITH MENTAL HEALTH AND COGNITIVE CHALLENGES**