

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

Steps for filling a Vacant Unit with an RGI household	4
Steps for allocating RGI assistance when there are no vacant units	5
Steps for filling vacant market rent units	6
Centralized Waiting List	6
Ranking of applicants on the centralized waiting list	8
Special Priority for Victims of Abuse.....	9
Removal from the Centralized Waiting List.....	9
Applicants Ceasing to be Eligible for RGI Assistance	10
Vacancy Management System.....	10
Applicant Location Preferences.....	11
Local Access Priorities for the Centralized Waiting List	12
Alternative Housing Providers	13
Special Needs Waiting Lists and Tenant Selection.....	13
Targeting Plans.....	15
Mandates	15
Seniors Mandate.....	15
Approved Mandates other than Seniors.....	15
Applying for a Mandate	17
Internal Transfer Waiting List.....	17
Special Priority Applicants on the Internal Transfer Waiting List	18
Local Rule - Overhoused RGI Households on the Internal Transfer Waiting List	19
Making an Offer to a Household on the Internal Transfer Waiting List.....	19
Local Rule - When You Offer a Unit to an Overhoused Household.....	20
Making an Offer to a Household on the Centralized Waiting List	21
Making an offer to an SPP applicant	22
Signing a Lease/Occupancy Agreement	22
RGI Decisions	24
Grounds for Refusing to Offer a Unit to an Applicant (Non-Special Needs)	24
Grounds for Refusing to Offer a Unit to an Applicant (Special Needs).....	24
Procedures for Refusing to Offer a Unit.....	25
After Refusing to Offer a Unit to an Applicant Household.....	25

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

Removing Applicants (that are not housed) from the Subsidiary List	26
Local Rules - Market Rent Households in Social Housing Applying for RGI Assistance	27
Market Rent Households May Be Eligible for a Backdated Application under Local Access Priorities	27
Market Rent Households Not Eligible for a Backdated Application	27
Local Rule - Market Rent Households in Social Housing Applying for RGI Assistance	28

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

This chapter applies to *RGI Administrators/housing providers* when filling rent geared to income units subject to the *Housing Services Act*. This includes:

- former provincial housing providers (*Housing Services Act*, Part VII)
- Toronto Community Housing (TCH)
- *Affordable Housing* providers who have signed rent supplement agreements with the City
- s.26/27/95 housing providers with rent supplement agreements with the City, and
- Housing Connections, when they administer rent supplement programs.

This chapter also applies to Housing Connections in their role as manager of the centralized waiting list system.

This chapter complies with the *Housing Services Act*, [Regulation 367](#), sections 43 to 51 and sections 72 to 77.

The steps for filling a vacant unit do not apply to Alternative Housing Providers who are not using the centralized waiting list to select tenants. See the section entitled "Alternative Housing Providers" for more information.

Steps for filling a Vacant Unit with an RGI household

Each time a household gives you notice that they are moving out, follow the steps detailed below until you fill the vacancy. The process starts when you receive notice from a household that is moving out, and ends when the new lease or occupancy agreement is signed.

This is an overview of the process. For details about each step, see the sections following in this chapter.

1) Determine if the vacant unit will be RGI or market

Review your

- a) targeting plan (HSA Part VII housing providers and TCH) or
- b) Rent Supplement Agreement (for all other RGI units)

If you do not have RGI assistance available, fill the vacancy with a market household using your established policy.

2) Make an RGI offer to a household on the Internal Transfer Waiting List

If you do have RGI assistance available, and you want to select or must select an RGI household, go to your internal transfer list. Offer the unit to the highest ranked household in order of priority

- a) First priority - SPP households
- b) Second priority - overhoused households
- c) Other priorities - your internal transfer waiting list may include other applicants as approved under your internal transfer waiting list policy.

When a household has accepted an internal transfer, you will still have a vacancy.

Continue to fill resulting vacancy(ies) until you have exhausted your internal transfer list of SPPs and overhoused completely.

If you still have a vacancy, fill the vacancy by following your policy. Your policy could require that

- a) you fill the vacancy from the internal transfer waiting list (may include other priority applicants and non-priority applicants), or
- b) you fill the vacancy from the centralized waiting list.

3) Make an offer to a household on the centralized waiting list

- a) use your assigned ID to sign in to the *vacancy management* system. Access your housing project subsidiary waiting list for the size of unit you are filling

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

- b) review your subsidiary waiting list for the size of unit that is available
- c) contact the first eligible households and/or their alternate contacts
- d) offer the unit to eligible households in order of priority/chronological order on the waiting list.

- 4) Make an RGI decision when a household refuses or when you refuse to offer

Follow the policies for households refusing to accept (if they refuse 3 offers) and an RGI administrator's refusal to offer. Households have the right to request a review of a decision you made not to offer a unit.

- 5) Record the results

Record the results of each attempt to contact and each offer on the vacancy management system.

- 6) Sign a lease or occupancy agreement

Review tenant/member requirements for maintaining eligibility for RGI assistance.

Steps for allocating RGI assistance when there are no vacant units

Note: this does not apply to rent supplement units administered by Housing Connections

If you have RGI assistance available but you don't have a vacant unit:

- 1) Review your policy on providing RGI assistance to market rent households

If your policy requires you to provide the next RGI allocation to someone from the centralized waiting list, you will have to wait until there is a unit vacancy. If your policy requires you to provide the next RGI allocation to a market rent household, see the steps below.

- 2) Review your subsidiary list to see if there are market rent households living in your project who have applied to Housing Connections.

- 3) Follow the Local Rule - Market Rent Households in Social Housing Applying for RGI Assistance

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

Follow the process detailed in the section Market Rent Households in Social Housing Applying for RGI Assistance.

4) Make an Offer

If TCH senior staff (for TCH) or the Social Housing Unit (for non-profits and co-ops) has approved the allocation to a market rent household, offer RGI assistance.

5) Sign a new lease or occupancy agreement

Review tenant/member requirements for maintaining eligibility for RGI assistance with the household.

Steps for filling vacant market rent units

The rules contained in this chapter do not apply when selecting market rent tenants. Housing providers can keep a waiting list for households that can pay market rent. This is a recommended best practice, as it will help to reduce vacancy loss.

TCH, non-profit and co-operative housing providers must inform their market rent households about the Local Rule on providing RGI assistance to market rent households. Explain the Local Rule at the leasing interview and include it in a tenant handbook and/or in newsletter articles.

Centralized Waiting List

The *Housing Services Act* requires the City of Toronto to maintain a centralized waiting list for RGI housing. This waiting list must include applications for

- HSA Part VII housing providers
- Toronto Community Housing
- social housing providers with rent supplement programs, and
- the rent supplement units managed by Housing Connections.

Housing Connections maintains the centralized list of households waiting for RGI housing on behalf of the City. Housing providers who receive subsidies from the City of Toronto to fund RGI assistance must select applicants from the centralized waiting list.

Housing providers may not keep RGI waiting lists, except for internal transfer of RGI households. All applicants for RGI assistance, including market rent households living in social housing, must apply to the centralized waiting list and be selected from the centralized waiting list.

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

Housing Connections informs the Social Housing Unit if they find that a housing provider that is required to use the centralized waiting list is not doing so.

Exception for Alternative Housing Providers: Alternative housing providers do not have to use the centralized waiting list, if they have provided the City with a copy of their tenant selection policy. See the section entitled "Alternative Housing Providers".

Exception for Special Needs Units: Housing providers may keep their own waiting list for special needs units (either modified for accessibility or providing support services) but this is not recommended. It is much easier for applicants to apply for multiple housing projects through the centralized waiting list. See the section entitled "Special Needs Tenant Selection".

Housing Connections receives applications for RGI assistance from

- new applicants for RGI housing
- RGI households wishing to move to another housing provider, and
- market rent households in social housing applying for RGI assistance.

Exception: Housing Connections only receives applications for RGI assistance for special needs units if they manage the special needs waiting list for the housing provider.

Housing Connections decides on the content of the application form and supporting documents required, subject to Regulations and *City Guidelines*.

The application must include a consent to the disclosure to Housing Connections of information and documents needed to process the application.

All household members 16 years of age or older must sign the application. There will be exceptions for special needs households, where warranted.

Where income information is provided, Housing Connections determines if the income is below the current Household Income Limits found in the *Housing Services Act*.

Housing Connections adds an applicant household to the centralized waiting list when they have determined that the household is eligible for RGI assistance. They also determine the unit size and type that a household is eligible for under the [Local Occupancy Standards](#).

Housing Connections attempts to confirm each household's interest in remaining on the centralized waiting list at least once every 18 months. Each time a household contacts Housing Connections, this is recorded as a confirmation of interest.

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

Housing Connections removes a household from the active waiting list and places them on the inactive waiting list if the household has not confirmed their interest at least once in the last 18 months. They maintain a household's application on the inactive waiting list for a period of 18 months before cancelling the application.

If at any time during the 18 month inactive period, the household confirms interest, Housing Connections reinstates the application on the active waiting list. Households that are reinstated on the active list get their original application date. They also get the location *preferences* that were in effect when the application became inactive.

Housing Connections maintains a household's application on the inactive list for a period of five years if their application shows a history of homelessness. If at any time during the five-year period, the household confirms interest, they re-instate the application on the active waiting list. The household being reinstated gets their original application date. They also get the location *preferences* that were in effect when the application became inactive.

Ranking of applicants on the centralized waiting list

Housing Connections ranks households on the centralized waiting list using the date Housing Connections determined the household is eligible for RGI assistance. However, the following exceptions apply:

- a household that Housing Connections determines eligible for Special Priority ranks higher than another household that is not a Special Priority household.
- the ranking date of a household eligible for Special Priority is the date the household applied for the special priority household category.
- a household receiving RGI assistance in Toronto who wishes to move to another housing provider in Toronto must complete a new application. They will be ranked by the date the household's new application is approved.
- **Local Rule** – an applicant household's project preferences are ranked by the date the household selected that preference, if the household selected the preference after being added to the centralized waiting list.
- **Local Rule** - the ranking date for a tenant of an alternative housing provider is the date the household first applied for RGI assistance with the alternative housing provider.
- **Local Rule** - the ranking date for an overhoused household is the date the household is added to the centralized waiting list. Under the local access priorities, an overhoused household ranks third, after special priority and terminally ill households. The RGI Administrator provides this information to Housing Connections.

- **Local Rule** - the ranking date for a market rent household applying for RGI assistance with their current housing provider is the date the household first applied for housing with the housing provider. If that date is not known, the ranking date is the date the household signed the initial lease with the housing provider. The RGI Administrator provides this information to Housing Connections.

Special Priority for Victims of Abuse

Housing Connections determines the eligibility of every applicant for Special Priority as a victim of abuse. Housing Connections establishes the

- application form
- documentation requirements, and
- assessment protocols for the review of SPP applications.

Housing Connections will remove the Special Priority designation from an applicant household if

- the applicant adds the abusing individual to the application;
- the person who abused the applicant is deceased; or
- the household accepts an RGI unit within Ontario.

Removal from the Centralized Waiting List

Housing Connections will remove a household from the centralized waiting list if

- the household asks to be removed, or the household ceases to be eligible for rent-geared-to-income assistance (see section below), or
- the household has accepted an offer of rent-geared-to-income assistance within Toronto. This does not apply if a household accepts
 - an offer of emergency shelter, or
 - temporary housing where one or more household members are receiving treatment or counselling, or
- **Local Rule** - the household has been overhoused for at least 12 months and has refused three offers for RGI units.

Housing Connections will temporarily remove a household from the active waiting list upon request. This applies if a household would not be able to accept an offer for a period of time. Examples include temporary residence in a shelter, training or rehabilitation program. The household must provide documents to substantiate the request. When the household is reinstated to the active waiting list, they maintain their original application date.

Applicants Ceasing to be Eligible for RGI Assistance

A household on the centralized waiting list ceases to be eligible for RGI assistance if:

- the household failed a basic eligibility requirement. For example:
 - an application for refugee status was declined by the federal government
 - an applicant's arrears from a former social housing tenancy were disclosed
 - an applicant's eligibility for RGI assistance was based on fraudulent documents
 - **Local Rule - Misrepresentation** - the household has been convicted by a court of
 - knowingly obtaining or receiving RGI assistance that they were not entitled to, or
 - committing a crime under the *Criminal Code* (Canada) in relation to the receipt of rent-gated-to-income assistance.

See [Chapter 3](#) for more information about eligibility.

- the household was offered and refused 3 units of a size that they are eligible for under local occupancy standards and they had selected as a *preference*
- the household was offered and refused 3 units in Housing Connections zones the household had indicated as their preferences
- the household was offered and refused 3 units that Housing Connections had selected on their behalf because the household had not selected preferences, and each refused offer was for a different unit

These rules do not apply when:

- a household is in or will be in temporary housing while one or more members receives treatment or counselling
- a household refuses a unit because the unit's physical characteristics make it inaccessible for the household.

Vacancy Management System

Housing Connections maintains a *vacancy management system*. The system includes a subsidiary waiting list for each housing project that uses the centralized waiting list. Each subsidiary waiting list includes all the active eligible households that indicate a preference for that housing project.

Housing Connections provides access to the vacancy management system for all housing providers who manage their own tenant selection and who have RGI units subject to the *Housing Services Act*. This includes RGI Administrators/social housing providers with rent supplement units.

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

All RGI Administrators/housing providers except for those alternative housing providers who are managing their own RGI tenant selection must use Housing Connections' on-line waiting list and vacancy management system.

Housing Connections keeps a separate RGI waiting list for each housing project by bedroom size. This list is called the subsidiary waiting list. If the housing provider/RGI Administrator has several projects, there will be a separate subsidiary list by bedroom size for each project.

RGI Administrators can access their subsidiary waiting lists through the vacancy management system on the internet. RGI Administrators must attend the Social Housing Unit's waiting list management training to get a login ID and password.

Housing Connections has reviewed the households on subsidiary lists for basic eligibility and to make sure that they meet any mandate that a housing provider has. Most applications are ranked according to the household's date of application. See Local Access Priorities (next page) for exceptions.

Applicant Location Preferences

When an applicant household selects location *preferences*, Housing Connections adds the household to each chosen subsidiary list that they are eligible for. In addition to new waiting list applicants (not housed yet), this includes:

- RGI households applying to move from one housing provider to another
- market households applying for RGI assistance in their unit, and
- overhoused RGI households.

Applicants decide how many or how few subsidiary waiting lists they choose to be added to, unless they are overhoused.

Exception: Local Rule - overhoused households that must be on the centralized waiting list must select location preferences for at least five housing **projects**. The household will remain on their current housing project's wait list, but this preference will not be counted as part of the required five. Housing Connections notifies an RGI Administrator if an overhoused household does not maintain five preferences.

If a household does not indicate a preference for a particular unit size, Housing Connections adds the applicant to subsidiary lists for the largest size unit it is eligible for.

If a household does not indicate any location preferences, Housing Connections adds the applicant to the subsidiary lists of all the housing projects it is eligible for in the Housing Connections' zone in which the household lives when they apply.

Local Access Priorities for the Centralized Waiting List

Local Access Priorities were approved by City Council in 2002. Within each of the priority categories, Housing Connections ranks priority applications by date on each subsidiary list.

The priorities for the centralized waiting list in the City of Toronto are, in order,

- special priority (SPP) for victims of abuse, as required by the *Housing Services Act*
- terminal illness, optional for housing providers. If a housing provider's board of directors has chosen to adopt this priority, you must notify Housing Connections in writing
- overhoused households

In addition, every seventh RGI vacancy must be filled by a household that is disadvantaged. That is

- people who are homeless, including homeless newcomers
- families separated because of a lack of affordable housing
- youth 16-17 when they applied

Housing Connections assigns a “DA” code to these applicants. Every seventh vacancy prompts the *vacancy management system* to produce a waiting list that includes only disadvantaged households.

Market rent households applying for RGI assistance in their unit are backdated to their original application date:

- the date that they originally applied to the housing provider, if the provider still has that information, or
- the date that they signed the original lease or occupancy agreement.

See Market Rent Households Applying for RGI assistance at the end of this chapter for more information about the priority assigned to them.

Alternative Housing Providers

Alternative housing providers serve formerly homeless individuals and other vulnerable households.

Alternative housing providers select tenants using their own tenant selection methods if:

- they have submitted a tenant selection plan to the City of Toronto, and
- they select tenants in accordance with their tenant selection plan.

Most alternative housing providers were given the "alternative" designation by the Province prior to the transfer of social housing to the City in 2002. Since that time, some new Affordable Housing developments have been constructed to serve formerly homeless individuals and other vulnerable households. Affordable Housing providers serving this client group may select tenants using their own tenant selection methods if:

- their tenant selection plan submitted to the City of Toronto has been approved, and
- they select tenants in accordance with their tenant selection plan.

RGI Administrators must use the centralized waiting list to select tenants if they do not meet the conditions set out above.

Special Needs Waiting Lists and Tenant Selection

Special needs waiting lists are for applicants requiring

- units modified for accessibility (usually modified for wheelchair users) and/or
- units in which at least one member of the household receives provincially funded support services to live independently.

At least one person in a household must require the accessibility modifications made to a unit and/or the support services provided with a unit in order to be eligible.

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

The *Housing Services Act* lists every housing provider with Special Needs Units as a Special Needs Housing Administrator.

Special Needs Applicants on Waiting Lists Managed by Housing Connections

Many housing providers delegated waiting list management for their special needs units to Housing Connections. We recommend that housing providers do this for their modified units without support, because it simplifies the access system for applicants. If you did not already delegate waiting list management for special needs units through the *RGI Service Agreement* and wish to do so now, contact your Social Housing Consultant.

Special needs applicants appear on subsidiary lists for modified units/bedroom size.

Housing Connections establishes the application form, documentation requirements, and assessment protocols for their review of special needs applications.

Special Needs Waiting Lists Managed by a Housing Provider or Support Agency

An RGI Administrator who manages their own special needs waiting list selects applicants according to a housing provider's documented policy.

An agency may refer or select applicants under the terms of a referral agreement with a housing provider. This agreement must be in writing and must be submitted to the housing provider's Social Housing Consultant.

Housing providers may enter into new agency referral agreements **only** for households requiring support services to live independently. Housing providers must submit their proposed referral agreements to their Social Housing Consultant for approval.

Refusing to Offer a Special Needs Unit

You may refuse to offer a special needs unit in certain circumstances. See "Refusing to Offer a Special Needs Unit".

Special Needs Eligibility for RGI Assistance: A household that is eligible for and is living in special needs housing gets RGI assistance when they need it.

Informing Housing Connections

When providing RGI assistance to a household housed from your own special needs waiting list, inform Housing Connections. If the household had applied to the centralized waiting list, Housing Connections will need to know so that they can cancel their application.

Targeting Plans

Every Part VII housing project has a targeting plan.

The targeting plan sets out the minimum number of

- RGI households
- market rent households, if any, and
- special needs households, if any.

RGI Administrators must maintain the minimum targets set out in the plan. For example, if your targeting plan calls for a minimum of 50 RGI households but only 49 households are receiving RGI, you must fill the next vacant unit with an RGI household.

As a best practice, RGI Administrators **should** be maintaining more than the minimum target for RGI units at all times. This will ensure that they never fall below minimum RGI target during the year.

Mandates

A *mandate* is a commitment on the part of a housing provider to house a particular client group. A mandate can apply to units in a rent supplement program if this is included in the Rent Supplement Agreement.

If you have been assigned a mandate, households who apply for RGI units in your project must include at least one person who qualifies for the mandate.

Seniors Mandate

Local Rule: Housing Connections adds applicants to a subsidiary list for a project with a seniors mandate when at least one person in the household is age 59 or older.

When determining eligibility for a seniors mandate, Housing Connections refers to age information already on file.

Note: To be eligible for a building with a seniors mandate, a household must include at least one person who is 59 years of age or older. A household may include members who are younger than 59 years of age. This does not affect the household's eligibility for the unit, since one or more members qualify for the mandate.

Approved Mandates other than Seniors

If a housing project has a mandate other than seniors, RGI Administrators confirm each applicant's eligibility before Housing Connections places them on the subsidiary waiting

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

list. When an applicant selects a preference for a mandated project, Housing Connections provides the household with

- a “*Confirmation of Applicant Eligibility*” form to be completed by the housing provider/RGI Administrator and
- a letter explaining the approval process.

Either the applicant or the RGI Administrator may return the form confirming eligibility. However, the applicant is responsible for making sure that Housing Connections receives their mandate confirmation.

Once Housing Connections receives confirmation of mandate eligibility, Housing Connections places the applicant on the subsidiary list.

Applicants may have listed a preference for the housing project before a mandate was established. In this case, Housing Connections gives the applicant the “*Confirmation of Applicant Eligibility*” form and advises them to have the housing provider/RGI Administrator complete it. Housing Connections will not consider the applicant eligible for the mandate if

- the applicant does *not* return the “*Confirmation of Applicant Eligibility*” form to Housing Connections within the time frame established by Housing Connections; or
- the housing provider states that the household is not eligible for the mandate.

If you have a mandate and you believe a household on your subsidiary list is not eligible for the mandate, ask Housing Connections to review the application.

Housing Connections establishes a new mandate in their vacancy management system when the City of Toronto provides written confirmation of its approval.

When None of the Remaining Members of the RGI Household Qualifies for the Mandate

The remaining household members will continue to receive RGI assistance in the current unit, provided that they meet all other eligibility requirements.

However, if the household becomes overhoused, they are not eligible to move to another unit size in the (mandated) project. In that case, the RGI Administrator must ensure that the overhoused household is added to the centralized waiting list.

Applying for a Mandate

All mandates must be approved by the City and must comply with the *Ontario Human Rights Code, 1990* (the Code).

The Social Housing Unit will consider requests for a mandate if:

- the mandate is intended as a special program under s. 14 of the Code:
 - to relieve hardship or economic disadvantage or
 - to assist disadvantaged persons or groups to achieve or attempt to achieve equal opportunity or
 - is likely to contribute to the elimination of the infringement of rights under Part I of the Code.

- the housing provider already has a seniors mandate and:
 - provides additional services or facilities that serve the interest of persons identified by a prohibited ground of discrimination (s. 18 of the Code) and
 - the housing provider or its parent or related organization owns a long-term care facility in Toronto, accredited by the Ministry of Health and Long-Term Care.

For more information on applying for a mandate, contact your Social Housing Consultant.

Internal Transfer Waiting List

The internal transfer waiting list is for RGI households who want to transfer to another unit or must transfer to another unit because they are *overhoused*. See [Chapter 4](#) for Local Occupancy Standards.

Under the *Housing Services Act*, RGI Administrators must rank RGI households requesting *special priority* first on the internal transfer waiting list. Under the City's local access priorities, overhoused RGI households are the next priority on the internal transfer waiting list.

The internal transfer waiting list for resident RGI households is ranked as follows:

- 1) Special Priority (SPP)
- 2) Overhoused
- 3) Other priorities chosen by the housing provider. For example, these could be transfers for medical reasons or because a household is underhoused.

Every housing provider must have an internal transfer policy for resident households. You must give a copy of your internal transfer policy to the Social Housing Unit.

An internal transfer policy does not have to include all transfer requests. For example, your internal transfer policy may state that the RGI Administrator will not accept transfer requests from applicants who want to move to a nicer unit.

Housing providers/RGI Administrators should review their internal transfer policy to determine if they want to give some priority in ranking to households who have too few bedrooms (underhoused).

Note: All members of an RGI household must apply for a transfer, not part of a household. If one or more members of a current household wish to leave that household and create a second household, their application for RGI assistance is a new application with a new application date. They must apply to Housing Connections.

For example, a current household has 4 members consisting of two parents, their daughter, and her baby. The daughter decides to move out with her baby and form a new, additional household. Her application would receive a new date, not the date of her parents' application.

Exception: If Housing Connections approves a **member** of an RGI household's application for Special Priority, the applicant is eligible for internal transfer.

Special Priority Applicants on the Internal Transfer Waiting List

Housing Connections assesses all applications for Special Priority status. Tell applicants requesting Special Priority status (SPP), including internal transfers, to apply to Housing Connections.

Special Priority applicants requesting an internal transfer must complete the *Special Priority Internal Transfer Application*. The form is on the Housing Connections' webpage entitled "[Applicant Forms](#)". Applicants can ask you to print the form for them. Once applicants have completed the form, they must submit the form to Housing Connections along with documentation needed to verify SPP.

Note: Alternative housing providers may accommodate a resident's request for consideration as a victim of abuse through their own tenant selection system procedures.

If Housing Connections confirms a household's eligibility for special priority, you must place the household at the top of the internal transfer list. Rank SPP internal transfers by the SPP application date provided by Housing Connections.

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

Housing Connections will only give reasons for their decision to the applicant, not to the housing provider.

Local Rule - Overhoused RGI Households on the Internal Transfer Waiting List

An RGI Administrator must notify an RGI household in writing when they make a decision that a household is overhoused.

Use the template Notice of Decision letter provided in Appendix 4 of [Chapter 10](#). This decision letter states that the household could lose their eligibility for RGI assistance if they refuse 3 offers and they have been overhoused for 12 months.

The decision letter also states that households have the right to request a review of a decision that they are overhoused. If the household asks for a review, the housing provider's review body carries out the review. See [Chapter 7](#).

As soon as you notify a household that they are overhoused, add the household to your internal transfer list. You must do this if your project includes at least one unit of a size that the household would be eligible for. See [Chapter 4](#) for more information about Local Occupancy Standards and when a household is overhoused.

RGI Administrators may not remove overhoused RGI households from the internal transfer waiting list unless the household is no longer overhoused (has accepted a smaller unit or more people joined the household).

Overhoused households rank second on internal transfer waiting lists after Special Priorities (SPP).

Making an Offer to a Household on the Internal Transfer Waiting List

If you have RGI assistance available and you want to select an RGI household, go to your internal transfer list and offer the unit to the highest ranked household in order of priority

- 1) First priority - SPP households.
- 2) Second priority - overhoused households
- 3) Other priorities - your internal transfer waiting list may include other applicants as approved under your internal transfer policy.

When a household has accepted an internal transfer, you will still have a vacancy.

Continue to fill resulting vacancy(ies) until you have exhausted your internal transfer list of SPPs and overhoused completely.

If you still have a vacancy, fill the vacancy following your board approved internal transfer policy. Your policy could require that you either

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

- fill the vacancy from the centralized waiting list, or
- fill the vacancy from the internal transfer waiting list (applicants that are not special priority or overhoused)

Local Rule - When You Offer a Unit to an Overhoused Household

Offering the same unit more than once

You may offer an overhoused household the same unit more than once, but do not record a household's refusal of the same unit more than once.

If an overhoused household refuses an offer

Overhoused households who refuse three offers will lose eligibility for RGI assistance. The three offers can be from the internal transfer waiting list, the centralized waiting list or both. Housing Connections notifies the RGI Administrator of an overhoused household when the household refuses an RGI offer.

- Each time they refuse an offer, send the household a letter letting them know how many more offers they can refuse before losing eligibility for RGI assistance.

If a household has refused 3 offers:

- issue a Notice of Decision that the household is no longer eligible for RGI assistance. See [Chapter 7](#) for information about the mandatory form *Notice of Decision – Loss of Eligibility for RGI Assistance*. The effective date of this notice must be at least 12 months after you originally notified them that they are overhoused.
- continue to offer vacant units to the household until the *Notice of Decision – Loss of Eligibility for RGI Assistance* is effective.
- if the household accepts an offer before the effective date, you must rescind the *Notice of Decision – Loss of Eligibility for RGI Assistance* **when they have moved**. Reinstate the RGI assistance retroactive to the effective date of the Notice.

Example:

- You notified a household that they are overhoused on January 10, 2013.
- Between January 30 and June 30, you offered them 3 units. They refused all 3 offers.
- On July 10, 2013 you send them a *Notice of Decision – Loss of Eligibility for RGI Assistance* stating that they will lose their eligibility for RGI assistance on February 1, 2014 (12 months after you notified them that they are overhoused)
- On September 30, you offer them a unit and they accept
- They move into the unit on December 1

- You send them a letter stating that the *Notice of Decision – Loss of Eligibility for RGI Assistance* is rescinded.

Making an Offer to a Household on the Centralized Waiting List

- Use your assigned ID to access your subsidiary waiting list for the size of unit you are filling
- review your subsidiary waiting list for households who are eligible for the size of unit that is available
- contact the first eligible households and/or their alternate contacts
- allow 2 business days for a reply to your call before determining that the household cannot be reached
- show the unit to interested households
- ask interested households to fill in an RGI income and asset review form and to provide proper income, assets and status documents (see template income and assets review form in [Chapter 10](#), Appendix 1)
- confirm the household's eligibility for RGI
- do a rental history check of the applicants
- hold membership interviews (for co-ops only) if needed (see below)
- offer the unit to the highest ranked household on the waiting list
- determine the total household income
- complete the RGI calculations
- call Housing Connections to confirm household composition if it is not the same as those listed in the application – if there is a change in household composition, their eligibility for a unit size or priority category could change
- record the results of every contact and every offer in the vacancy Management System.

Record an offer for an RGI unit as refused if you made personal contact with the applicant household to offer the unit and

- the household replied and refused the unit, or
- the household did not reply to the offer within two business days.

Record an offer for an RGI unit as withdrawn if you have not made personal contact with an applicant.

- sign a lease/occupancy agreement with the household after discussing the household's requirements for maintaining eligibility for RGI assistance.

Note for co-ops only: Co-ops may ask applicants to attend an information session and/or an interview. If the co-op feels that the applicants will not fulfil their responsibilities as members of the co-op, the co-op can refuse to offer a unit to the household. See sections "Procedures for Refusing to Offer a Unit" and "After Refusing to Offer a Unit to an Applicant Household" for more information.

For more information, see CHF Canada's overview of [member selection in a housing co-op](#).

We recommend that applicants be pre-approved for membership well in advance so that when vacancies occur, membership interviews do not slow down the offer process.

Note: Record the results of an offer right away, by updating the vacancy management system. This should always be done within 2 business days of a household accepting or refusing a unit.

Making an offer to an SPP applicant

If an SPP applicant wants to add a new person to the household at any time before the lease/occupancy agreement is signed, send the household to Housing Connections for an eligibility review.

Housing providers/RGI Administrators must establish a policy that tells applicants how long the provider will wait for the results of an SPP eligibility review before offering the vacant unit to the next household. The policy must give a minimum of 3 days.

RGI Administrators must notify Housing Connections if they have information that the abuser is deceased or if the applicant has accepted an offer for RGI housing somewhere else.

Exception: The above does not apply to alternative housing and special needs housing providers who maintain their own waiting lists.

Signing a Lease/Occupancy Agreement

When a household accepts a unit, set up a leasing interview.

At the leasing interview, review the RGI program rules and the consequences of breaching them with the household:

- ✓ Annual review reporting
- ✓ Rules for reporting changes in income, assets or household composition
- ✓ Absence from Unit rule
- ✓ Guest Policy

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

If you believe that the household may have difficulty understanding or complying with their responsibilities:

- tell the household to have someone read them the contents of letters from you
- encourage them to sign a consent to share information with a designated contact (could be a friend, family member or support worker)
- if the household does not have someone to designate as a contact, note in the household's file that this household may need greater assistance in the form of personal contact from the RGI Administrator.

As a best practice, provide each household with a *Tenant Handbook*. Contact your sector organization to get a tenant handbook template.

RGI Decisions

During the tenant selection process, an RGI Administrator has to decide

- if a household is eligible for RGI housing or special needs housing
- if the household is eligible for the size of unit available for offer, and
- the rent that an RGI household must pay.

The applicant household has a right to ask for a *review* of these decisions.

Grounds for Refusing to Offer a Unit to an Applicant (Non-Special Needs)

You may only refuse to offer a unit to a household if:

- the applicant does not qualify under the eligibility criteria (see [Chapter 3](#))
- the applicant's income is too high to qualify them for RGI assistance
- the applicant does not meet your project's mandate
- you have reasonable grounds to believe that the applicant will not pay the rent in full or on time. You must base this decision on a **rental history check**, not a credit check.
- the unit is a shared unit and you believe that the applicant is not suitable
- you represent a non-profit housing co-operative and either the applicants state or the co-op decides that the applicants will not accept their responsibilities as members of the co-op.

Grounds for Refusing to Offer a Unit to an Applicant (Special Needs)

You may only refuse to offer a unit to a special needs household if:

- the applicant does not meet your project's mandate
- you have reasonable grounds to believe that the applicant will not pay the rent in full or on time. You must base this decision on a **rental history check**, not a credit check.
- the unit is a shared unit and you believe that the applicant is not suitable
- the level of support services that are provided is significantly greater or significantly less than the level of support services required by the applicant household
- you represent a non-profit housing co-operative and either the applicants state or the co-op decides that the applicants will not accept their responsibilities as members of the co-op.

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

If the special needs household is applying for RGI assistance, the household must qualify under the eligibility criteria (see [Chapter 3](#)).

If a special needs household does not qualify under RGI eligibility criteria, you may offer the unit as a market rent unit.

Note: An RGI Administrator cannot refuse to offer a unit to a household who cannot pay a security deposit or last month's rent if the household agrees to a reasonable payment plan.

Procedures for Refusing to Offer a Unit

If you decide not to offer a unit to an applicant, you must send a written notice of refusal to the applicant within 10 days of offering the unit to another household. The notice must

- inform the applicant of the refusal and what information you used to make the decision
- tell the applicant household how to request a *review* of the decision
- tell the applicant household the deadline for requesting a *review*

The review does not stop the RGI Administrator from filling the unit with the next eligible applicant.

If the reviewers reverse the decision, the applicant household that had been refused keeps its place on the centralized waiting list. The RGI Administrator will offer the household the next suitable unit that becomes available.

After Refusing to Offer a Unit to an Applicant Household

You must issue a notice of refusal to offer within 10 days after offering a unit to another household. You must also inform Housing Connections within 10 days.

You must keep a file that contains

- a written record of any review
- a written record of the notice of refusal.

Local Rule - Review of Refusal to Offer a Unit

The applicant household must make a written request for a review within 30 calendar days after the RGI Administrator issues the notice of refusal to the household. The applicant may withdraw their request for a review, in writing.

Housing providers/RGI Administrators must complete the review within 30 calendar days. They must give the applicant written notice of the final decision within 10 calendar days after the decision is made.

No one who was involved in making the initial decision can participate in the review.

In housing co-operatives, if a membership committee is responsible for member selection, then the board may hear a review of a refusal to offer.

Removing Applicants (that are not housed) from the Subsidiary List

Housing Connections can remove an applicant from your subsidiary list upon request from the RGI Administrator, in the following situations:

- an applicant has refused your offer and has indicated that they are not interested in receiving other offers for your project, **or**
- you have refused to offer your vacancy to an applicant (see grounds for refusing to offer on page 24). Do not ask for the applicant to be removed from your list until you have sent the applicant a Notice of Refusal to Offer.

Housing Connections will remove a refused applicant from a subsidiary list when an RGI Administrator records a request to remove on the vacancy management system.

If a review body decides that a refusal to offer should be reversed, the RGI Administrator must inform Housing Connections in writing. Housing Connections will reinstate the applicant to their original position on the waiting list.

Local Rules - Market Rent Households in Social Housing Applying for RGI Assistance

The *Housing Services Act* Reg. 367/11 s.48.1 requires that service managers have **Local Rules** on providing RGI assistance to market rent households.

Housing providers/RGI Administrators must inform all market rent households about the **Local Rules**.

Market Rent Households May Be Eligible for a Backdated Application under Local Access Priorities

Households that are living in social housing and paying market rent can apply for RGI assistance. They must apply to the centralized waiting list. If they wish to stay in their current housing project, their application date, under Local Access Priorities is:

- the date that they originally applied to the housing provider/RGI Administrator, if the provider still has that information, or
- the date that they signed the original lease or occupancy agreement.

To get the earliest application date, RGI Administrators submit the [Provider Authorized Application](#) form (see page 2 of the link) to Housing Connections with the household's completed Housing Connections application. Housing Connections will backdate the application (see page 11 of this chapter.)

The *Provider Authorized Application* form is also available through Housing Connections' website at www.housingconnections.ca. Navigate to the *Providers* tab at the top of the page, click on *Provider Forms*.

Market Rent Households Not Eligible for a Backdated Application

Not all market rent households will qualify to have their application backdated. **Do not submit** the *Provider Authorized Application form* to Housing Connections if:

- 1) The market rent household lost their RGI assistance because of a breach of the *Housing Services Act* regulations or Local Rules, such as:
 - a conviction for fraud or misrepresentation related to the receipt of RGI assistance - see [Chapter 3](#) of the RGI Administration Manual
 - failure to report a change in income or household composition,
 - failure to submit annual review documents,
 - being overhoused and refusing to move, and
 - being absent from their unit for longer than permitted under the Local Rule for Absence from Unit - see [Chapter 3](#) of the RGI Administration Manual

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

- 2) Members of a market rent household wish to form a second household.
- If one or more members of a current household intend to leave that household and create a second household, their application for RGI assistance is considered a new application. Housing Connections will assign a new application date for the second household.

For example, a current household has 4 members consisting of two parents, their daughter, and her baby. The daughter and her baby decide to move out on their own and form a new, additional household. Their application would receive a new date, not the date of her parents' application.

- 3) The market rent household is applying for RGI assistance with another housing provider or service manager. This household will receive a new application date.
- 4) The market rent household voluntarily gave up RGI assistance in order to move to another building without applying for an internal transfer. The household's application date will be the date they signed the lease for the new building.

Local Rule - Market Rent Households in Social Housing Applying for RGI Assistance

If an RGI Administrator has RGI available but no vacant unit, the RGI Administrator may give RGI assistance to a market rent household **if all the following conditions have been met:**

1) Written Authorization Received

- For Part VII or rent supplement housing providers: the RGI Administrator has received written authorization from the Social Housing Unit, or
- For TCH: the operations staff has received written authorization from Program Services senior staff.

Note: The City will not fund RGI assistance allocated by a Part VII or rent supplement RGI Administrator under this policy unless the RGI Administrator received prior consent from the Social Housing Unit.

Documents to Submit for Authorization to Allocate RGI Assistance

- The RGI Administrator must submit
 - ✓ a completed *Market Household Requesting RGI Assistance – Information and Approval form* (Excel form) – see #7 below, and
 - ✓ a valid copy of the *Applicants Using Your Address* (AUYA) report - see #7 below
- Part VII and rent supplement RGI Administrators submit the documents to their Social Housing Consultant
- TCH operations staff submit the documents to senior staff of Program Services

2) Household Eligibility

The household meets all the following conditions:

- the household has applied to the centralized waiting list and has been notified that they are eligible; and
- the household is requesting RGI assistance in the unit in which they currently live; and
- the housing provider has determined that the household qualifies for the unit size they currently occupy under the [Local Occupancy Standards](#); and
- the household has lived in a building owned by the housing provider for the last 5 or more consecutive years; and
- the household is in good standing with their housing provider (no arrears, but if there are arrears for either rent/occupancy charges or damages, they are eligible if they have a repayment plan that is in good standing).

3) Targeting Plan

- For Part VII housing providers: the housing provider is below their maximum target for RGI.
- For Rent Supplement housing providers: the housing provider is below their maximum allocation for rent supplement units
- For TCH: not applicable

4) Previous RGI Assistance Allocation

The last time the RGI Administrator allocated RGI assistance, they allocated it to the highest ranked household on their subsidiary waiting list at Housing Connections

5) Housing Provider Policy Required

- For Part VII and Rent Supplement housing providers: the housing provider board has adopted a Market Household Requesting RGI Assistance policy. This policy establishes how often the RGI Administrator will allocate RGI assistance to an eligible market rent applicant. The policy must require the RGI Administrator to allocate RGI assistance to the highest ranked household on the building's Housing Connections waiting list at least every second time; and
- For TCH: TCH has adopted a policy on providing RGI assistance to market rent households. The policy must require TCH to allocate RGI assistance to the highest ranked household on the building's Housing Connections waiting list at least every second time.

6) Communication

The RGI Administrator has communicated the policy to all market tenants/members.

7) Selection of Applicant for Approval by the Social Housing Unit or TCH

The RGI Administrator has selected the highest ranked market rent household on the *Applicants Using Your Address* (AUYA) report that agreed to accept the RGI assistance:

- Part VII housing providers can obtain an AUYA Report from Housing Connections by e-mailing their request to provider.reps@housingconnections.ca.
- TCH staff can download the AUYA report directly.
- The AUYA report has a 'Valid Until' date at the top of the document. The AUYA Report must be current.
- The AUYA report will list Housing Connections applicants for your building who have used your building's address in their application form.
- The AUYA Report could include applicants using your building's address that are not market rent households. Only market rent households are eligible.
- The highest ranked household on the AUYA Report will have the oldest *Preference Date for Current Provider*.

CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

- More than one applicant may have the same preference date. The applicant who applied for RGI assistance first (*Date RGI Assistance Requested for Current Provider*) will be ranked higher.
- If the RGI Administrator is not selecting the highest ranked applicant, use the *Market Household Requesting RGI Assistance – Information and Approval form* to document the reasons why (not eligible or refused).

Download a copy of the [Market Household Requesting RGI Assistance – Information and Approval form](#) from the RGI Administration Manual webpage. It is listed following Chapter 8.

Refusal of RGI Assistance

If you have recorded that a household refused RGI assistance, a best practice is to get this confirmed in writing. If the household member does not send you a letter, send a letter to the household stating that the household refused the offer. This will avoid potential disputes about which household is next on the waiting list for RGI assistance.

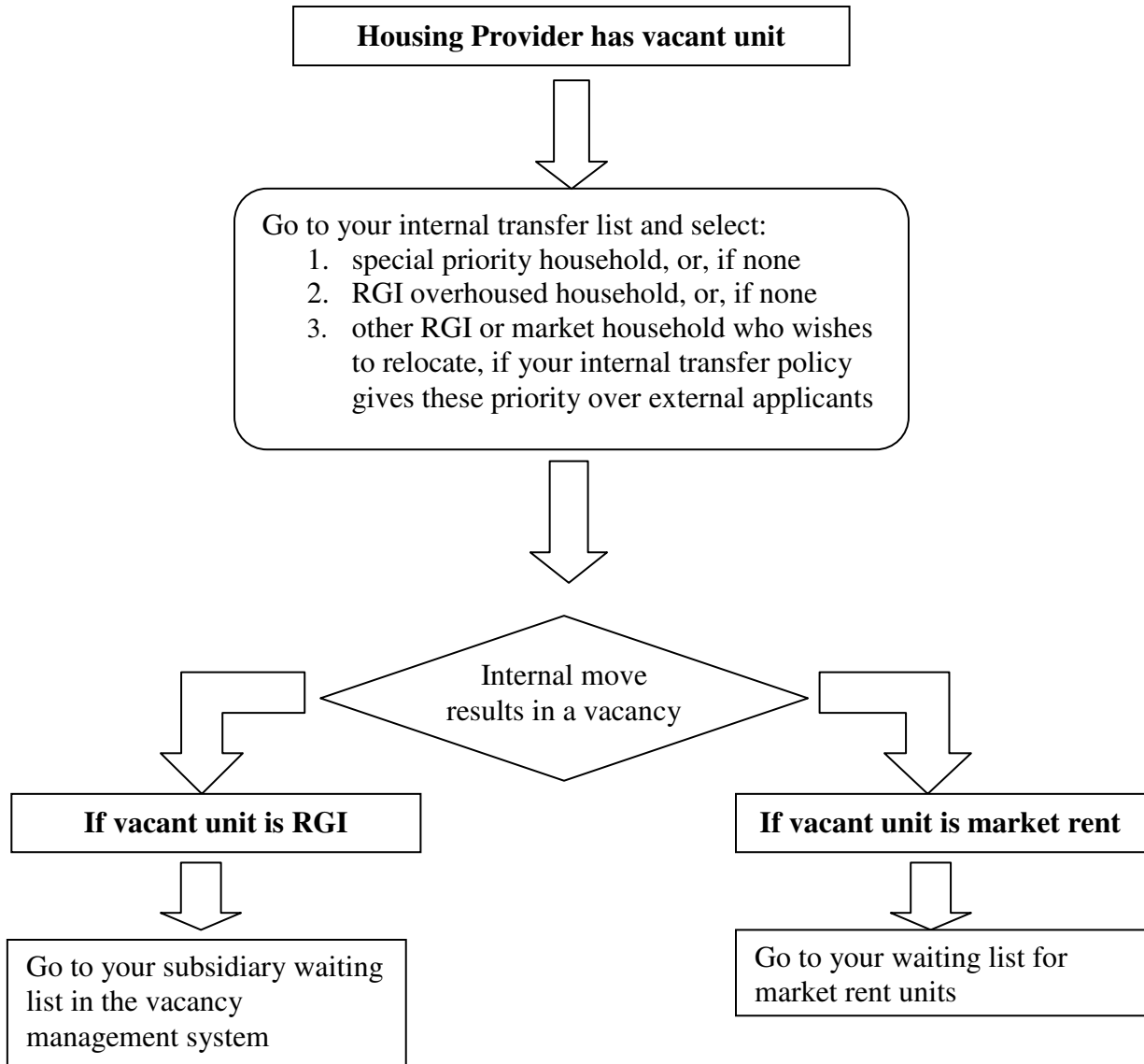
RGI Assistance Effective Date

The start date for RGI assistance approved by the City or TCH for a market rent household will be the first day of the month following the month in which:

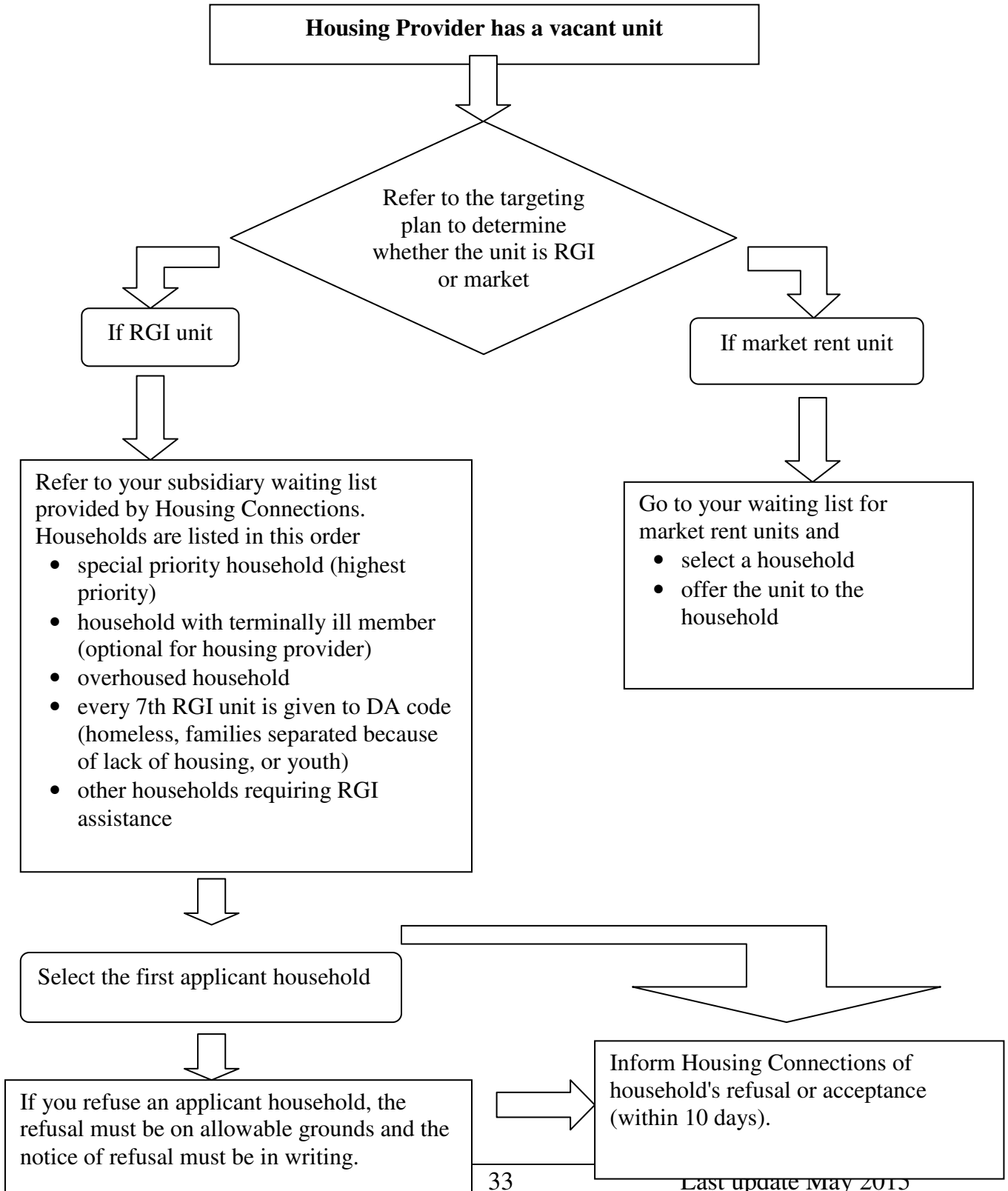
- the Part VII or Rent Supplement housing provider submits the request to the City,
or
- TCH operations staff submit the request to TCH senior staff of program services

Summary of RGI Unit Allocation Process

**Filling a Vacant Unit
Using your Internal Transfer List
(RGI and Market Units)**

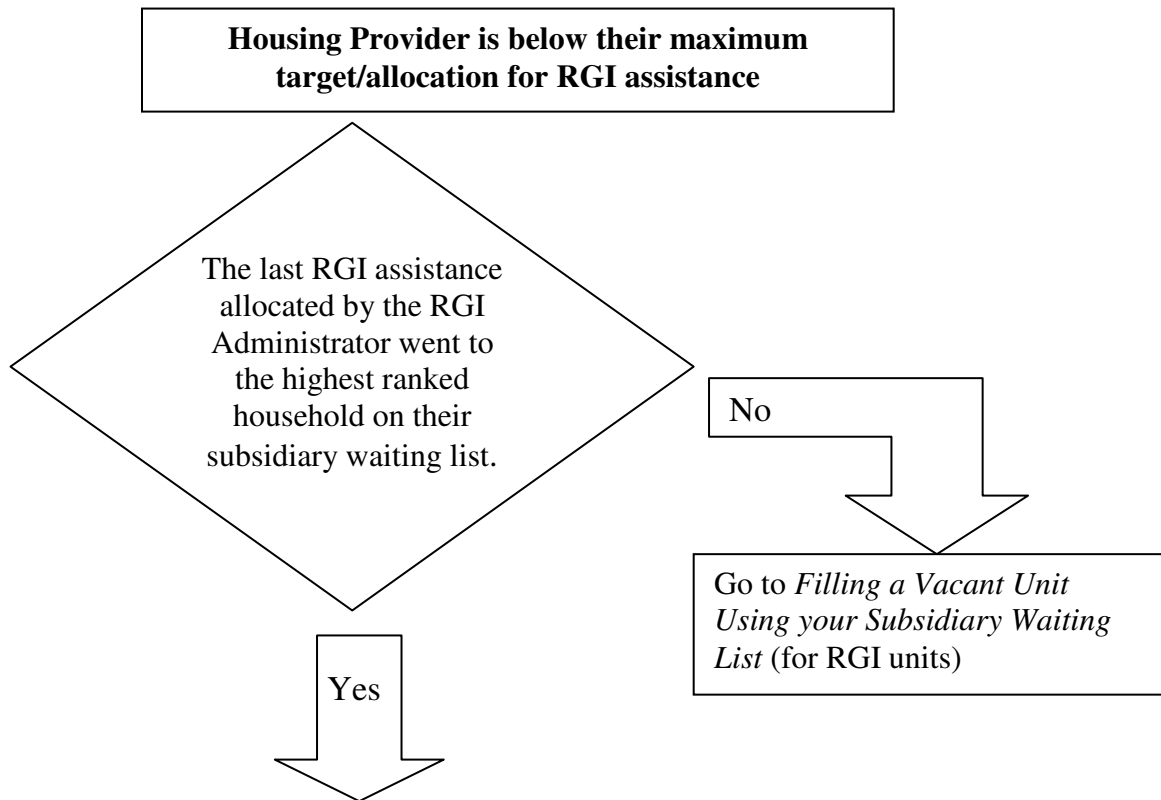


**Filling a Vacant Unit
Using your Subsidiary Waiting List for RGI units or
your External Waiting List for Market Rent units**



CHAPTER 8: FILLING VACANCIES AND ALLOCATING RGI ASSISTANCE

Allocating RGI assistance to a market rent household living in your housing project(s)



Ask Housing Connections for the report *Applicants Using Your Address*

Select the first market rent household from *Applicants Using Your Address* who meets all the following conditions:

- ✓ has requested RGI assistance in the unit in which they currently live;
- ✓ has lived in a building owned by the housing provider for 5 or more consecutive years;
- ✓ has applied to the centralized waiting list and has been notified that they are eligible;
- ✓ qualifies for the unit size they currently occupy under the local occupancy standards;
- ✓ is in good standing with their housing provider (no arrears and/or outstanding damages) *



Submit a completed [Market Household Requesting RGI Assistance – Information and Approval Form](#) with the *Applicant Using Your Address* report to your Social Housing Consultant/ TCH senior staff



Receive written consent and make offer to selected household

*Exception: the household is eligible if they have a repayment plan in good standing