

AN URBAN AND RURAL  
**INDIGENOUS HOUSING**  
IMPLEMENTATION PLAN FOR ONTARIO



**ONPhA**

ONTARIO NON-PROFIT  
HOUSING ASSOCIATION



## *About* **THE ONTARIO NON-PROFIT HOUSING ASSOCIATION**

Founded in 1988, ONPHA is an independent association funded and directed by its members, representing close to 700 of Ontario's non-profit housing providers. Our members house more than 400,000 people in 163,000 homes across 220 Ontario communities. Many of our members provide specialized housing and support services for Ontarians who need help to enjoy a successful tenancy.

For more information, visit [www.onpha.on.ca](http://www.onpha.on.ca).

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Community Housing  
Transformation Centre  
Centre de transformation  
du logement communautaire

# EXECUTIVE SUMMARY

The Urban and Rural Indigenous Housing Implementation Plan for Ontario provides a strategy and blueprint for relevant stakeholders and partners (including government, non-profit, and industry) to move forward to address the disproportionate rates of core housing need among Indigenous households in urban and rural areas of Ontario, which in turn will ensure immediate and long-term socioeconomic benefits for both Indigenous communities and the Province more broadly.

The Implementation Plan was developed following the launch of the Ontario Non-Profit Housing Association's (ONPHA) [\*Urban and Rural Indigenous Housing Plan for Ontario \(URIHPO\)\*](#) in May 2020, which was based on engagement with Indigenous housing providers (IHPs) across the province. The Implementation Plan seeks to validate (and adjust, as needed) the recommendations in the *URIHPO*, with a primary focus on ensuring an Indigenous-led approach and securing funding to develop the units required to meet urban and rural Indigenous housing needs in Ontario.

Several converging factors underscore the need for Indigenous-led urban and rural Indigenous housing solutions in Ontario, including but not limited to, the rapid growth rate of Indigenous populations (54% over 10 years); the increasing urbanization of Indigenous peoples (nearly 85%); the disproportionately high rate of Indigenous poverty (24%) and core housing need (18%); and the considerable overrepresentation of Indigenous peoples in the health, justice, and social services systems.

The *URIHPO* identified the need for at least 22,000 subsidized Indigenous-owned and operated units over the next 10 years to meet the current and projected housing needs of off-reserve Indigenous populations in Ontario<sup>1</sup>. The initial \$7.3 billion investment could save \$14.3 billion in system efficiencies, through cost savings in social services, healthcare, shelter services, justice, and foster care, while significantly boosting Indigenous personal incomes through improved employment and education outcomes. Moreover, the construction program would create 95,000 year-jobs in the construction sector and other industries, while adding \$3.8 billion to the economy through construction multipliers.

The *URIHPO* was developed as a companion strategy to ONPHA and the Cooperative Housing

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<sup>1</sup> The figures in the *URIHPO* were based on data from Statistics Canada, literature and document reviews, case studies, and surveys and interviews with IHPs in Ontario. For a variety of reasons, Indigenous people may not be accurately represented through current government data systems (e.g., Census data). As a result, some Indigenous communities feel that such information severely underrepresents the accurate size and composition of Indigenous populations throughout Canada, in turn producing conservative estimates related to both community need, as well as system savings and benefits.



Federation of Canada's 2018 [Affordable Housing Plan for Ontario](#), following the unanimous adoption by ONPHA's membership of a resolution put forth by the ONPHA Urban and Rural Indigenous Housing Advisory Committee (URIHAC) resolving that ONPHA work with partners to call on federal and provincial governments to implement urban and rural Indigenous housing strategies. The Affordable Housing Plan for Ontario presented a fully-costed, 10-year strategy to build a minimum of 99,000 new affordable rental and supportive housing units, repair 260,000 community housing units, and deliver income supports to 311,000 households. On an annual basis, the investment could realize up to \$1.1 billion in savings in the health and justice systems, create \$2.6 billion in construction multipliers, and increase consumer spending by \$1.1 billion.

The Urban and Rural Indigenous Housing Implementation Plan for Ontario recognizes the essential involvement of IHPs as community leaders and experts to inform its development and execution. Accordingly, built into each phase of the Implementation Plan is ongoing engagement, evaluation, and adjustment to ensure each phase and associated approach(es) continue to align with IHP perspectives and priorities. In addition, the Implementation Plan identifies opportunities to collaborate with and leverage existing government priorities and initiatives, including Canada's National Housing Strategy, Ontario's Community Housing Renewal Strategy, and municipal 10-Year Housing and Homelessness Plans.

While Canada's National Housing Strategy has rightly identified the need for distinctions-based strategies for First Nations, Inuit, and Métis communities, there remains a considerable gap in meeting the needs of Indigenous households living off-reserve in the absence of a fourth strategy for urban, rural, and northern<sup>2</sup> Indigenous communities. At the same time, federal operating agreements for urban Indigenous housing providers<sup>3</sup> are beginning to expire, significantly threatening the sustainability of their operations and their ability to continue supporting Indigenous communities.

The development of the Implementation Plan was based directly on feedback gathered from the approximately 50 IHPs in Ontario<sup>4</sup> through a series of engagement activities, with guidance and direction provided by the URIHAC. These engagement activities focused on understanding and synthesizing the diverse perspectives from across the Indigenous housing sector in Ontario regarding how to effectively address and implement the six recommendations in the *URIHPO*.

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<sup>2</sup> At the national level, advocacy for off-reserve Indigenous housing also includes reference to "northern" areas to capture the need in the territories, but could also describe the provincial north

<sup>3</sup> Through CMHC's Rural and Native Housing and Urban Native Housing programs

<sup>4</sup> ONPHA and Daniel J. Brant & Associates, in consultation with the Indigenous program administrators in Ontario, determined contact information for 51 unique Indigenous housing providers. Between the formation of that list in early 2021 and the publication of this report, these numbers may have shifted.

Two clear priorities for the Implementation Plan emerged throughout the IHP engagement activities:

1. All aspects of the implementation process and execution must be Indigenous-led and controlled through a “For Indigenous, By Indigenous” (FIBI) approach
2. Funding must be secured to build and operate at least 22,000 subsidized off-reserve Indigenous-owned and operated units<sup>5</sup>

Resoundingly, IHPs are calling for a transformational change to the current Indigenous housing policy and funding framework that would ensure both operations and development are well-funded, streamlined, and efficient, while providing flexibility for regional and capacity differences and ensuring control remains with the IHPs.

The Implementation Plan has four distinct phases: Strategic Planning, Development of Conceptual Model, Construction Program, and Reflection, Assessment, and Adjustment. The first phase outlines the strategic planning elements needed to ensure the implementation is carried out effectively, including ongoing advocacy to secure long-term funding. The second phase addresses the development processes required to transform the system for delivering and funding Indigenous housing in order to build at least 22,000 Indigenous housing units over a 10-year period. The third phase identifies the operational aspects of the construction program. The fourth phase is ongoing throughout the entirety of the Implementation Plan, with reflection, assessment, and adjustment to ensure progress that is aligned with the guiding principles and vision of the Implementation Plan. Importantly, each phase and component of the Implementation Plan must be undertaken in a manner consistent with the FIBI principles.

The community housing sector in Ontario is at a pivotal moment in history as the Province wraps up consultation on the Community Housing Renewal Strategy, the federal government aims to strengthen the National Housing Strategy, and municipalities seek to invigorate their role in delivering affordable housing. Moreover, the pressing needs of Indigenous communities as a result of the ongoing impacts and legacy of colonialism are front and centre in the national discourse, with renewed focus on the Truth and Reconciliation Commission’s Calls to Action and the Calls for Justice in the Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls.

As the world cautiously approaches recovery from the global COVID-19 pandemic, now is the time for investment to implement urban and rural Indigenous housing solutions.

Indigenous communities and organizations have been working in strong partnership, laying the

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<sup>5</sup> Throughout the engagement activities, IHPs resoundingly identified the need for more than 22,000 additional units to meet community needs

groundwork to map needs, scope solutions, and develop strategies. Indigenous-led efforts are crucial to understanding and addressing diverse community needs, supporting Indigenous self-determination, and advancing along the path of truth and reconciliation. The Urban and Rural Indigenous Housing Implementation Plan for Ontario will have broad-reaching impacts, helping to stimulate economic growth during this unprecedented downturn and ensuring communities across the province are supported sustainably for the long-term.



## FIRST, A WORD ON LANGUAGE

**Indigenous** refers to First Nations, Métis, and Inuit peoples of Turtle Island, living in what is now referred to as Canada. Indigenous people are not necessarily required to hold a status card or be recognized by any particular government; rather, they are recognized by the Indigenous community or communities to which they attribute their belonging.

**The Implementation Plan** speaks to Indigenous housing needs in Ontario *off-reserve*. Rural settings in the Plan do not include reserve lands. It is important to note that this is not the only Indigenous Housing Plan for Ontario. Indigenous communities on reserve also require urgent attention and funding for housing. The Implementation Plan does not address the housing needs related to reserve territories, but whole-heartedly recognizes the housing needs that exist and likewise demands that adequate, sustainable funding be made available for housing needs on reserve.

The term **community housing**, rather than social housing, is used to capture the diverse range of housing types and programs throughout the sector. Community housing also implies a relationship and conveys the importance that many Indigenous housing providers place on creating community with their tenants and other community members. Community housing includes non-profit housing, as well as cooperative housing; funding structures for each of these

community housing models are different, although the clientele is part of similar demographics<sup>6</sup>.

The term **subsidized/deeply affordable housing** is used rather than affordable housing to clearly convey the level of need and support required for the Indigenous households in the Implementation Plan. While “affordable housing” generally refers to housing with below-market rent rates (usually 80% of average market rent), it often remains unaffordable for many. Housing is typically considered to be subsidized/deeply affordable when it costs approximately 25–30% of household income.

**Supportive housing** generally refers to a combination of housing assistance and support services that enables people to live as independently as possible in a community setting. Currently, supportive housing providers may access dedicated funding through a number of provincial ministries (e.g., Municipal Affairs and Housing, Health and Long-Term Care, and Children, Community and Social Services, as well as Ontario Aboriginal Housing Services (OAHS) and Miziwe Biik Development Corporation (MBDC) as Indigenous program administrators). Many housing providers, including Indigenous housing providers, offer housing with supports, which may include culturally-supportive housing (i.e., housing with culturally-relevant programming/services), but do not received dedicated supportive housing funding and are thus not designated as such.

## CONTEXT

The following section provides an overview of the development of the Implementation Plan, outlines its guiding principles and priorities, and sheds light on the current context of community housing in Ontario. It also highlights ongoing advocacy efforts at both the provincial and national levels for Indigenous-led housing solutions, as well as data and resources that informed the recommendations outlined below.

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<sup>6</sup>Indigenous cooperative housing providers, along with the Cooperative Housing Federation of Canada, were involved in the development of the Implementation Plan, and must continue to be involved in ongoing engagement activities and decision-making processes throughout each phase of the Implementation Plan. While Indigenous co-operative and non-profit housing providers are facing similar challenges with an imminent end to their operating agreements, the solutions and recommendations identified in the Implementation Plan may not necessarily be applicable or desirable for Indigenous co-ops, considering that they have a different operational model and funding relationship with the federal government (through CMHC) than Indigenous non-profit housing providers.

## Background

In 2018, the Ontario Non-Profit Housing Association's (ONPHA) membership unanimously adopted a resolution put forth by its Urban and Rural Indigenous Housing Advisory Committee (URIHAC) resolving that ONPHA work with partners to call on federal and provincial governments to implement urban and rural Indigenous housing strategies. To support this resolution, ONPHA engaged with Daniel J. Brant & Associates and a Steering Committee composed of URIHAC members to develop an [Urban and Rural Indigenous Housing Plan for Ontario \(URIHPO\)](#).

Released in May 2020, the *URIHPO* outlines socioeconomic, legal, and historical arguments to support six calls to action with clearly identified costs, savings, and benefits:

1. Set out a 10-year housing program to build 22,000 subsidized Indigenous owned and operated units to address core housing need;
2. Provide a support plan to encourage Indigenous people to move along the housing continuum;
3. Develop support programs and ensure cultural continuum;
4. Engage the Indigenous community housing sector to leverage opportunities to increase Indigenous control, management, vision and direction towards the implementation of the Urban and Rural Indigenous Housing Plan for Ontario;
5. Develop a comprehensive database of the Indigenous community housing sector;
6. Leverage opportunities to engage the private sector through the use of tax and other incentives.

The *URIHPO*'s cost-benefit analysis identified that the initial \$7.3 billion investment required for the 22,000 units could save \$14.3 billion in system efficiencies, through cost savings in social services, healthcare, shelter services, justice, and foster care, while significantly boosting Indigenous personal incomes through improved employment and education outcomes. Moreover, the construction program would create 95,000 year-jobs in the construction sector and other industries, while adding \$3.8 billion to the economy through construction multipliers<sup>7</sup>.

Following the release of the *URIHPO*, ONPHA and the URIHAC identified the need to develop an Indigenous community housing sector-led Urban and Rural Indigenous Housing Implementation Plan for Ontario to validate the recommendations in the *URIHPO* and develop a roadmap for an Indigenous-led approach to build at least 22,000 additional Indigenous housing

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<sup>7</sup> IHPs consistently identified the need for more than 22,000 additional units to meet community needs, suggesting that the system savings and benefits would also be much greater than estimated in the *URIHPO*.

units. To do so, ONPHA re-engaged with Daniel J. Brant & Associates to bring together and engage Indigenous housing providers (IHPs) from across the province on their perspectives and priorities for the implementation of Indigenous housing solutions, and set priorities for provincial and federal advocacy to resource and implement those solutions.

## **GUIDING PRINCIPLES AND PRIORITIES**

Based on feedback shared throughout the various IHP engagement activities (see Methodology section below for more information), the following principles and priorities were identified to guide the development of the Implementation Plan:

1. Ensure all aspects of the Implementation Plan are Indigenous-led and controlled through a “For Indigenous, By Indigenous” (FIBI) approach (including governance, advisory, and ownership)
2. Secure dedicated funding from federal, provincial, and municipal governments to build and operate at least 22,000 subsidized Indigenous-owned and operated housing units in urban and rural regions across Ontario<sup>8</sup>
3. Acknowledge and build in flexibilities for regional and capacity differences
4. Ensure Indigenous housing providers have agency, authority, and autonomy
5. Streamline application and reporting process for maximum administrative efficiency

### **“For Indigenous, By Indigenous” (FIBI)**

Throughout each of the engagement activities, IHPs consistently identified the importance of ensuring a FIBI approach as a top priority for the Implementation Plan. This approach was recognized not only as an integral guiding principle for the Implementation Plan itself, but also as a means by which to ensure ongoing engagement with IHPs throughout each phase of the Implementation Plan.

As community experts, it is fundamental that IHPs drive all aspects of the Implementation Plan, with recognition of the diverse perspectives across the sector and a focus on ensuring regional

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<sup>8</sup>Funding must be indexed to reflect the inflation that has occurred since the numbers were projected, and as the project evolves. A minimum of \$7.3 billion for construction and \$2.5 billion for operations is required based on 2019 data.

and representative participation. This extends to governance, design, program development, construction, operations, advisory services, oversight, and ownership, consistent with the principles of Ownership, Control, Access, and Possession (OCAP)<sup>9</sup> and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

The IHP engagement activities were critical to the development of the Implementation Plan, including validating its vision and direction and ensuring that it represented diverse community perspectives and priorities. Following the release of the initial needs assessment through the *URIHPO*, IHPs are looking for an Implementation Plan that will achieve the key recommendations of increasing Indigenous control in the sector and securing long-term funding for the required units. To do so, IHPs overwhelmingly agreed on the need for transformational change in the policy and funding framework for Indigenous community housing in Ontario. A strong desire emerged for a shift away from the current approach, while ensuring that both existing and future funding agreements, as well as capital and seed funding are provided more efficiently through a new, dedicated, Indigenous-led system.

Engagement, consensus-building, and decision-making with IHPs remain key components throughout each phase of the Implementation Plan, and are essential to its success. Further consultation is required to determine the conceptual model(s) for the transformational system change required, recognizing the range of regional and capacity needs, as well as the diverse perspectives and priorities across the Indigenous housing sector in Ontario.

## Advocacy Program

In response to ongoing advocacy from across the community housing and related sectors, federal, provincial, and municipal governments are increasingly aware of the pressing need for community-led solutions for urban, rural, and northern (URN) Indigenous housing, and are interested in how this might be implemented.

Alongside Indigenous and housing partners at both the provincial and national levels<sup>10</sup>, ONPHA continues to highlight the need for each of these levels of governments to prioritize and work in true partnership with Indigenous communities, organizations, and leaders based on principles of self-determination, sovereignty, and reconciliation to sustainably resource and implement Indigenous-led housing solutions.

Regulatory development under Ontario's Community Housing Renewal Strategy, as well as opportunities through Canada's National Housing Strategy and upcoming provincial and

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<sup>9</sup> The OCAP Principles refer to Ownership, Control, Access, and Possession of data, by those whose data is being gathered. These principles were developed by the First Nations Information Governance Centre. More information can be found at <https://fnigc.ca/ocap-training/>

<sup>10</sup> See: Canadian Housing and Renewal Association Indigenous Caucus; Aboriginal Housing Management Association



municipal election activities present timely opportunities to advance these priorities, including the recommendations contained within this report (see below for more information). As such, ongoing advocacy remains a critical component of the Implementation Plan.

## Current Context

Community housing in Ontario is at a critical moment in history, as the Province wraps up consultation activities to support regulation development under the Protecting Tenants and Strengthening Community Housing Act, 2020. These regulations will inform the parameters of the future legislative framework for community housing in Ontario. For IHPs facing the imminent expiration of their operating agreements, as well as the broader community housing sector, these consultations presented a timely opportunity to support the development of regulations to create a sustainable community housing system, including generating flexible, sector-driven solutions that ensure the sector's resilience and growth, and the ability to continue supporting all Ontarians for generations to come.

At the same time, the federal government is exploring opportunities to strengthen its National Housing Strategy, including recognizing the need for a dedicated approach for URN Indigenous housing. Numerous studies and recommendations on URN Indigenous housing solutions have been put forth by federal bodies, including the House of Commons Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities<sup>11</sup>, the Office of the Parliamentary Budget Officer<sup>12</sup>, and the National Housing Council<sup>13</sup>. In particular, the National Housing Council has identified URN Indigenous housing as an urgent priority and critical gap in the National Housing Strategy<sup>14</sup>, indicating strong federal support and appetite to pursue and co-develop URN Indigenous housing solutions with Indigenous communities and leaders.

During the 2021 federal election campaign, four of the major parties recognized the need to implement a “For Indigenous, By Indigenous” national housing strategy. With a new mandate – and a new, dedicated housing portfolio – the Liberal government has committed to co-develop urban, rural, and northern Indigenous housing solutions with Indigenous partners, and

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<sup>11</sup> Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities. (2021). Indigenous housing: The direction home. Available at: <https://www.ourcommons.ca/DocumentViewer/en/43-2/HUMA/report-5/>

<sup>12</sup> Office of the Parliamentary Budget Officer. (2021). Urban, rural, and northern Indigenous housing. Available at: <https://www.pbo-dpb.gc.ca/en/blog/news/RP-2021-039-C--urban-rural-northern-indigenous-housing--logement-autochtones-vivant-en-milieu-urbain-rural-nordique>

<sup>13</sup> National Housing Council Working Group on Urban, Rural, and Northern Indigenous Housing. (2021). National urban, rural and northern Indigenous housing & homelessness: A case for support and conceptual model. Available at: <https://www.placetocallhome.ca/en/national-housing-council/media-newsroom/national-urban-rural-northern-indigenous-housing-homelessness-report>

<sup>14</sup> National Housing Council. (2021). Communiqué from the National Housing Council. Available at: <https://www.placetocallhome.ca/en/national-housing-council/media-newsroom/communique-june-2021>

with sustainable investments<sup>15</sup>.

Recognizing the disproportionate impacts of the COVID-19 pandemic on Indigenous communities across the country, compounding with long-standing housing and other socioeconomic gaps<sup>16</sup>

(outlined further in the *URIHPO*), it is incumbent on governments to invest in Indigenous housing as a central pillar of socioeconomic recovery planning. Such investments are critical to help meet government commitments to support progress along the path of reconciliation, including addressing many of the recommendations outlined in the Final Reports of the Truth and Reconciliation Commission and the National Inquiry into Missing and Murdered Indigenous Women and Girls.

## Supporting Data

Throughout the engagement activities, IHPs identified the need for a more comprehensive and detailed assessment of both the needs and capacity in the broader Indigenous-serving sector (beyond housing) to support the implementation of Indigenous housing solutions in a manner consistent with the principles and priorities identified above. While opportunities were available for other Indigenous-serving organizations to participate in and share feedback on the Implementation Plan through some of the engagement activities (i.e., a broad survey), little data was collected from this cohort during this process<sup>17</sup>.

As such, the participation of other Indigenous service agencies and organizations must be integrated into the development of the Implementation Plan, considering their integral role in supporting the provision of Indigenous housing (e.g., by offering other culturally-relevant services and programming)<sup>18</sup>. Such organizations could include, but are not limited to, Friendship Centres, Indigenous health centres, Indigenous justice centres, local First Nations, Métis, and Inuit communities and organizations, and municipal social service agencies.

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<sup>15</sup> Liberal Party of Canada. (2021). Forward. For Everyone. Available at: <https://liberal.ca/wp-content/uploads/sites/292/2021/09/Platform-Forward-For-Everyone.pdf>

<sup>16</sup> Including the disproportionately high rates of Indigenous poverty and considerable overrepresentation of Indigenous peoples in the health, justice, and social services systems.

<sup>17</sup> A broader environmental scan in partnership with other Indigenous service organizations is required to undertake this type of data collection to ensure accurate representation from the broader Indigenous-serving sector, which was beyond the purview of the engagement activities for the development of the Implementation Plan.

<sup>18</sup> It is important to note that the operation of Indigenous housing generally includes close relationships and partnerships with other Indigenous service organizations to provide culturally-relevant, wraparound services and supports for households. This is part of what creates a unique and safe environment in IHPs.

## A New Approach – Efficiency of Resources

The current system for the funding and administration of Indigenous housing in Ontario poses significant barriers to effective and sustainable service delivery, as funding is limited both in terms of access and availability for IHPs. Moreover, inconsistent relationships with and requirements from Service Managers<sup>19</sup> (outlined below) lead to further inconsistencies in program delivery. Consequently, IHPs communicated significant dissatisfaction with the existing Indigenous community housing system throughout the engagement activities.

The *URIHPO* provided detailed analysis on the socioeconomic benefits and public cost-savings associated with the provision of 22,000 deeply affordable, culturally-supportive housing units for Indigenous households in core need. These significant cross-sector savings and gains (e.g., in justice, healthcare, social services, employment, education, etc.), totalling \$14.3 billion over 10 years (plus an additional \$3.8 billion in economic growth)<sup>20</sup>, signal the need for all government departments and ministries that stand to benefit from these gains to allocate resources toward the development of Indigenous housing. With direct benefits related to the construction of these units, it is incumbent on all relevant government agencies to contribute to the implementation of Indigenous housing solutions.

For instance, the significant cost of homelessness far outweighs the cost of building and maintaining community housing. Meanwhile, access to safe, affordable, culturally-supportive housing is associated with increased education and employment opportunities, improved health outcomes, decreased involvement in the justice system, and overall economic growth. Detailed documentation and analysis on this data is available in the *URIHPO*, signalling that many government departments and ministries – including but not limited to housing, social services, health, long-term care, justice, corrections, education, and employment – would realize financial savings and gains from the development of Indigenous housing.

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<sup>19</sup> A Service Manager is a level of government in Ontario responsible for carrying out the funding and responsibilities of the provincial Housing Services Act, 2011. This could be a regional government, a county, or a separated city, depending on the local services. The provincial government created District Social Services Administration Boards (DSSABs) in northern regions of Ontario where there was no existing municipal government with the legal jurisdiction to act as a Service Manager. DSSABs have the same funding and administrative responsibilities as Service Managers. In addition to the 47 Service Managers/DSSABs across Ontario, there are also two Indigenous Program Administrators, Ontario Aboriginal Housing Services and Miziwe Biik Development Corporation, that deliver funding for Indigenous-specific housing initiatives.

<sup>20</sup> These figures are in 2018 dollars. It is important to consider both inflation and that the demand for housing has since grown, and with it, the potential cost savings and benefits. Further, the 22,000 units identified is a conservative estimate based on the limited data available, and as such, associated savings and gains would be much greater with the provision of more units.

# TOTAL ECONOMIC BENEFITS AND SAVINGS BY SECTOR

22,000 UNITS OVER 10 YEARS

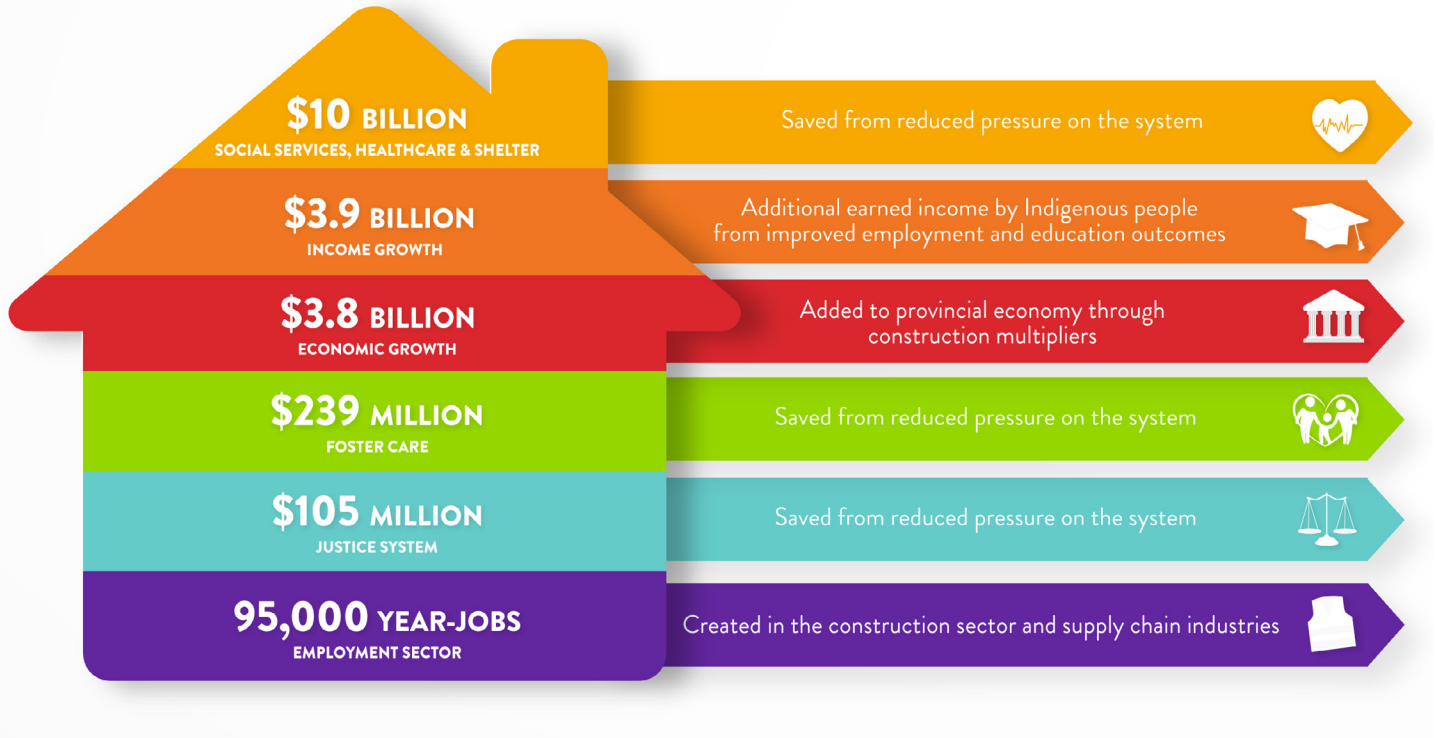


Figure 1. Total economic benefits and savings by sector

# METHODOLOGY

The Implementation Plan was developed by Daniel J. Brant and Associates, the same consultants that developed the *URIHPO*, in close collaboration with IHPs across Ontario, including non-profit (both ONPHA and non-ONPHA members) and cooperative housing providers. The primary methodologies included a broad sector survey and a series of engagement sessions with the IHPs.

In February 2021, all IHPs in Ontario were invited to participate in an anonymous survey, and were encouraged to share the survey with other Indigenous-serving organizations whose services relate to and/or support the provision of Indigenous housing. The survey sought feedback on priorities, process, gaps, needs, and anticipated challenges for the implementation of Indigenous housing solutions.

In addition to the survey, all IHPs were invited to participate in one of four targeted regional engagement sessions held virtually in March 2021 to share their perspectives and priorities for the Implementation Plan. The engagement session regions included the Greater Toronto Area, Southern and Central Ontario, “Near” Northern Ontario, and further Northern Ontario, representing the current distribution of IHPs across the province.

Further engagement was then conducted at the ONPHA Indigenous Housing Provider Gathering in May 2021, open to all IHPs from across Ontario. At the Gathering, participants had an opportunity to review the initial Implementation Plan materials based on the broad survey and targeted engagement sessions, share feedback, and validate the findings through a series of interactive activities, including polls, breakout sessions, and plenary discussions. Following the Gathering, participants had an opportunity to share additional feedback toward the Implementation Plan and further engagement opportunities.

## Limitations

While IHPs share many experiences, they also operate in distinct contexts and possess diverse perspectives and priorities. It is important to note that the data and feedback below represent what was gathered from the IHPs that participated in the survey and/or other engagement activities. As such, it does not represent fulsome data or feedback from the broader Indigenous community housing sector in Ontario. Fundamental to each phase of the Implementation Plan is achieving fulsome, representative participation from IHPs across the province.

Below are the highlights of the results from the February 2021 survey and four targeted engagement sessions held in March 2021. Detailed results are provided in Appendix 1.



## FINDINGS

### Survey Results

The survey was undertaken in an electronic format and sent to 51 IHPs across Ontario. 30 total responses were received (with 17 fully completed responses), proportionally representing the four key regions across the province (Greater Toronto Area, Southern Ontario, Near North, and Northern Ontario). While the survey results do not capture the full breadth of perspectives from across the Indigenous community housing sector (and are therefore not fully representative of the sector as a whole), the response rate was quite high (59%, nearly double the average survey response rate of 30%) with many outreach attempts made to IHPs to complete the survey.

The intent of the survey was to obtain an up-to-date indication of IHP support for the recommendations in the *URIHPO*, as well as considerations for the governance and management required for the Implementation Plan.

#### Highlights of the survey results include:

- On a scale from 1 – 10, the average response rate for the importance of a “For Indigenous, By Indigenous” (FIBI) approach to all aspects of the Implementation Plan was 8.5<sup>21</sup>

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<sup>21</sup> With 1 being “not at all” and 10 being “very important”

- 87.5% of respondents considered the *URIHPO* to be achievable
- 62.5% of respondents indicated that more than 22,000 units are needed over the next 10 years to meet community need/demand
- Respondents identified the need for new construction (31.6%), purchase of existing units (31.6%), and acquisition of land (26.3%) for development (recognizing significant cost disparities based on region)<sup>22</sup>
- Respondents recognized the need for partnerships (34.4%), contracting with developers (28.1%), mergers/amalgamations (15.6%), and outsourcing (12.5%) to build the required units<sup>23</sup>
- A combination of 52.9% of respondents stated they did not currently have the capacity to manage the development of the needed units, with 29.4% of those respondents identifying that they could with additional funding for capacity building and increased administrative needs
- 47.1% of respondents identified the need for more funding overall to build the required units
- On a scale from 1 – 10, the average response rate for the importance of a strong advocacy program to advance the implementation of Indigenous housing solutions was 9.3<sup>24</sup>

## Engagement Session Findings

In addition to the survey, all IHPs in Ontario were invited to participate in one of four targeted regional engagement sessions, held virtually in each of the four key regions identified above. A total of 19 representatives participated in the four sessions, with representation from across the province. As above, the engagement session results do not represent the full scope of perspectives from across the Indigenous community housing sector. However, concerted efforts were similarly made to engage all providers in the sessions.

### **Challenges with the current system**

Participants identified a significant number of inconsistencies in the current delivery system, between regions and Service Managers. There were clear inconsistencies with Service Managers, connected to limited funding available or accessible in the current system, as well as differences in Service Managers' perceived responsibilities and activities to support Indigenous housing.

As in the survey results, IHPs were critical of the current administration and distribution of

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<sup>22</sup> Participants could select multiple responses

<sup>23</sup> Participants could select multiple responses

<sup>24</sup> With 1 being “not at all” and 10 being “very important”

funding, and adamant that any new capital funds must always be accompanied by operating dollars. Moreover, participants highlighted the need for funding to be distributed equitably among IHPs across the province, with consideration for demand, region, capacity, land purchase costs, and construction costs.

### ***Development needs***

Participants identified significant barriers, including zoning permits, land purchases, and regulations preventing an efficient development process. IHPs are interested in a transformational change that will ensure their operations and development are well-funded, streamlined, and efficient, while ensuring control remains with IHPs. As in the survey results, participants agreed the estimate of 22,000 units was too low to meet current (and future) demand.

Participants also shared the need for more accessible design options to support Indigenous seniors and other households requiring supports, recognizing these as significant gaps in the current community housing system. IHPs emphasized that the housing continuum<sup>25</sup> is not linear, but is closer to a mosaic, and requires significant development to ensure the availability of accessible options along the continuum in all areas of the province that are choice and circumstance-based for the individual.

### ***Cultural supports***

With respect to the provision of culturally-relevant, wraparound supports, participants identified barriers to funding the cultural continuum<sup>26</sup> along the Indigenous housing continuum. Participants noted that this is due in part to the restriction and limitation of funding within different ministries, as well as specific, narrow requirements and certifications required from IHPs to access those funds. These comments reinforced the need for funding for both the housing continuum and the cultural continuum to be provided by a collection of government departments and ministries benefiting from their services, rather than simply from the few (including some municipal/regional bodies) that currently fund Indigenous housing programming. Further information on this recommendation is provided below.

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<sup>25</sup> The housing continuum refers to the spectrum of ways to house a person or a family: From those experiencing homelessness to those in the shelter system, supportive housing, community housing, subsidized housing, affordable housing, market rent and home ownership (including different levels of home ownership).

<sup>26</sup> The cultural continuum refers to actions and services supporting Indigenous protocols and ceremonies.



## ***“For Indigenous, By Indigenous” (FIBI)***

Participants were adamant that Indigenous control must be at the forefront of the Implementation Plan through a FIBI approach. Further consultation with IHPs is required to determine the preferred approach to administering and delivering funding for Indigenous housing. However, participants clearly communicated the need to maintain flexibility to support regional and capacity differences, while ensuring a coordinated, streamlined, and efficient system.

### ***Data***

Up-to-date data on the current state, gaps, needs, and capacity in the Indigenous housing sector was recognized as essential for advocacy. Participants identified that current reporting requirements are not helpful to advance Indigenous housing solutions, despite requiring significant staff capacity. Moreover, because data is so fluid, enormous effort, resources, and capacity would be required to maintain a new Indigenous housing database that is current and useful.

While participants agreed a database could be relevant to support Indigenous housing advocacy and development efforts, the development and maintenance of a database must be well-resourced and sustainable for the long-term, and result in net time-savings and operational efficiency for IHPs. Importantly, the data must conform to the principles of Ownership, Control, Access, and Possession (OCAP).

### ***Partnerships***

Finally, participants recognized the importance of ongoing partnerships with the private sector to build the required units and encourage the development of more Indigenous community housing. However, they stressed that IHPs must continue to lead and manage the development process, ultimately ensuring Indigenous agency, control, and ownership of the units.



# IMPLEMENTATION

The *URIHPO* provided a needs assessment and cost-benefit analysis for Indigenous housing in urban and rural regions in Ontario, and proposed an approach to undertaking a major construction and/or acquisition project to meet the identified needs. To implement a project of this scale, distinct phases are required to ensure its success, including providing flexibility to assess and adapt approaches as the project unfolds. An overview of the Implementation Plan’s four phases (and precursory Preparation Stage) is illustrated in **Table 1 on page 28**.

## Considerations

The first and deciding factor for the Implementation Plan is securing dedicated funding for the development and operation of the required urban and rural Indigenous housing units in Ontario (and consequently realize the compounding socioeconomic benefits). In response to feedback raised throughout the IHP engagement activities, the Implementation Plan proposes a path for transformational change to the administration and delivery of funding for Indigenous housing.

While this is an Ontario-based initiative and strategy, similar efforts are underway in other provinces and territories (such as the Aboriginal Housing Management Association’s British

Columbia Urban, Rural, and Northern Indigenous Housing Strategy<sup>27</sup>), and at the national level, led by the Canadian Housing and Renewal Association (CHRA) Indigenous Caucus<sup>28</sup>. As such, opportunities to align with these strategies are also crucial to the Implementation Plan's success.

To ensure the Implementation Plan effectively models a FIBI approach, the inclusion of IHPs in all decision-making processes is essential, as outlined throughout the phases below. Beyond IHP participation alone, engagement opportunities must ensure broad participation and representation from across the Indigenous housing sector to capture diverse community priorities and perspectives.

This will play an important role in the decision-making process related to the conceptual model for the administration and delivery of funding for Indigenous housing in Ontario as part of the Preparation Stage. While agreeing on the need for transformational change, IHPs were unable to reach consensus on a preferred approach throughout the engagement activities to date, and identified the need for further opportunities to discuss options together (outlined in the phases below). Potential options for a new approach to administering and delivering funding for Indigenous housing could include, but are not limited to:

1. Establishing a centralized, Indigenous-led entity to administer and deliver funding for Indigenous housing
2. Developing regional, Indigenous-led entities to administer and deliver funding for Indigenous housing in their respective areas (e.g., Toronto, London, Sudbury, and Thunder Bay)
3. Having an existing entity or entities administer and deliver funding for Indigenous housing (e.g., ONPHA, the Canada Mortgage and Housing Corporation (CMHC), Ontario Aboriginal Housing Services (OAHS), Miziwe Biik Development Corporation (MBDC), etc.)

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<sup>27</sup> Available at: [http://www.ahma-bc.org/s/AHMA\\_BCURNIHousingStrategy\\_220124.pdf](http://www.ahma-bc.org/s/AHMA_BCURNIHousingStrategy_220124.pdf)

<sup>28</sup> CHRA Indigenous Caucus. (May 2018). A For Indigenous By Indigenous National Housing Strategy. Available at: [https://forindigenousbyindigenous.ca/wp-content/uploads/2020/10/2018-06-05\\_for-indigenous-by-indigenous-national-housing-strategy.pdf](https://forindigenousbyindigenous.ca/wp-content/uploads/2020/10/2018-06-05_for-indigenous-by-indigenous-national-housing-strategy.pdf)

**Table 1. Overview of Proposed Phases for Implementation of the Urban and Rural Indigenous Housing Plan for Ontario**

<b>STAGE 1: PREPARATION</b>				
<b>Phase #</b>	<b>Item</b>	<b>Description</b>	<b>Potential Lead</b>	<b>Proposed Timelines</b>
<b>Phase 1</b>	<b>Initial needs analysis</b>	Determine urban and rural Indigenous housing needs in Ontario for the next 10 years, including cost-benefit analysis	ONPHA and URIHAC, developed by Daniel J. Brant and Associates	Urban and Rural Indigenous Housing Plan for Ontario ( <i>URIHPO</i> ) released by ONPHA in May 2020
<b>Phase 2</b>	<b>Implementation Plan</b>	Develop Implementation Plan for Indigenous housing solutions based on broad, foundational engagement with IHPs across Ontario	ONPHA and URIHAC, developed by Daniel J. Brant and Associates	Implementation Plan released by ONPHA in May 2022 (TBC)
<b>Phase 3</b>	<b>Secure Funding for Continued Engagement</b>  (the following phases are contingent on securing this funding)	<ul style="list-style-type: none"> <li>- Prepare and submit funding application for dedicated resource(s) to continue engagement process with IHPs to determine conceptual model for Indigenous housing policy and funding</li> <li>- Secure funding for dedicated resource(s)</li> <li>- Support recruitment of dedicated resource(s)</li> <li>- Continue advocacy to secure long-term funding for following Implementation Plan phases</li> </ul>	ONPHA and URIHAC (other potential partners TBD)	Targeted for 2022
<b>Phase 3b</b>	<b>Continued Engagement</b>	<ul style="list-style-type: none"> <li>- Continue engagement process with IHPs to determine conceptual model</li> <li>- Determine lead transition for following Implementation Plan phases (including required funding for development of conceptual model)</li> <li>- Continue advocacy to secure long-term funding (including for conceptual model, construction, and operations)</li> </ul>	TBD	Targeted for 2022

*continues on next page...*

<b>STAGE 2: IMPLEMENTATION</b>				
<b>Phase 1</b>	<b>Strategic Planning</b>	<ul style="list-style-type: none"> <li>- Continue advocacy to secure long-term funding</li> <li>- Build and strengthen partnerships</li> <li>- Develop communications strategy</li> <li>- Explore potential funding sources and legislative changes</li> <li>- Identify IHP capacity development needs</li> </ul>	TBD	Targeted for 2023
<b>Phase 2</b>	<b>Development of Conceptual Model</b>	<ul style="list-style-type: none"> <li>- Secure required funding (including for conceptual model, construction, and operations)</li> <li>- Obtain legislative modifications</li> <li>- Finalize policies and procedures according to conceptual model</li> <li>- Explore database needs/ development opportunities</li> </ul>	TBD	Targeted for 2023–2025
<b>Phase 3</b>	<b>Construction Program</b>	<ul style="list-style-type: none"> <li>- Build/buy housing units to meet current and needs</li> <li>- Support ongoing IHP capacity development</li> <li>- Explore opportunities to meet needs in underserved areas</li> </ul>	TBD	Targeted for 2025–2035
<b>Phase 4</b>	<b>Reflection, Assessment, and Adjustment</b>	Ongoing throughout Implementation Phases 1-3	TBD	Targeted for 2023–2035



## STAGE 1: PREPARATION

To date, ONPHA and the URIHAC, supported by Daniel J. Brant and Associates, have taken the lead in the Preparation Stage for this project, including the development, release, and ongoing advocacy related to the initial needs analysis through the *URIHPO* (Phase 1) and the foundational engagement toward the development, release, and advocacy related to the Implementation Plan (Phase 2).

### PHASE 3A: SECURE FUNDING FOR CONTINUED ENGAGEMENT

- >>> Recruit dedicated resource(s) to continue engagement with IHPs
- >>> Potential funding sources for dedicated resource(s)
- >>> Ongoing advocacy to secure long-term funding

#### 3A.1 RECRUIT DEDICATED RESOURCE(S) TO CONTINUE ENGAGEMENT WITH IHPS

ONPHA and the URIHAC (along with other potential partners) could support the process to seek funding for and recruit a dedicated resource(s) to continue the IHP engagement to determine the preferred conceptual model and funding delivery mechanism for urban and rural Indigenous housing in Ontario. The recruitment process and ultimate choice of candidate should be developed to ensure transparency and accountability and ensure the dedicated resource(s)

can objectively and neutrally lead the subsequent engagement process (free from any real or perceived conflicts of interest).

The dedicated resource(s) should possess significant knowledge and experience in the Indigenous community housing sector. Their role would involve mediating discussions and developing creative solutions to represent diverse perspectives and build consensus across the Indigenous housing sector. They must adhere to the Guiding Principles outlined above, and be responsive to the perspectives and priorities of the IHPs.

### **3A.2 POTENTIAL FUNDING SOURCES FOR DEDICATED RESOURCE(S)**

Potential avenues to seek funding for the dedicated resource(s) include, but are not limited to, the Community Housing Transformation Centre, the Canada Mortgage and Housing Corporation, and other funding streams through Canada's National Housing Strategy, as well as relevant provincial ministries (e.g., Ministries of Municipal Affairs and Housing, Indigenous Affairs, etc. – see more in potential funding sources section below), the Ontario Trillium Foundation, and local community foundations.

### **3A.3 ONGOING ADVOCACY TO SECURE LONG-TERM FUNDING**

While ONPHA may support the funding and recruitment process, once the conceptual model is determined, it is critical that governance and execution of the Implementation Plan ultimately shifts to align with the guiding FIBI principle, recognizing ONPHA's position as a non-Indigenous, settler organization (governed by and accountable to a non-Indigenous Board of Directors). Importantly, this would not preclude ONPHA and other potential partners from continuing to advocate for Indigenous housing solutions (including long-term, dedicated funding for development and operations), but would ensure that all aspects of the Implementation Plan are Indigenous-led and governed.

## PHASE 3B: CONTINUED ENGAGEMENT

- >>> Determine the conceptual model through consensus-building
- >>> Identify considerations for policies and procedures
- >>> Determine lead transition for Implementation Plan
- >>> Ongoing advocacy to secure long-term funding

### 3B.1 DETERMINE THE CONCEPTUAL MODEL THROUGH CONSENSUS-BUILDING

As noted above, further engagement with IHPs is required to determine the preferred conceptual model for the future policy and funding framework for urban and rural Indigenous housing in Ontario. IHPs have identified the need for continued opportunities to discuss and weigh options together.

Through ongoing engagement with IHPs, the dedicated resource(s) should work to achieve consensus to determine the preferred conceptual model for Indigenous housing policy and funding in Ontario, ensuring a FIBI approach that reduces inefficiencies and leads to transformational change (to be finalized in the Implementation Stage). The engagement process must ensure that the diverse priorities and perspectives of IHPs from across the sector are addressed and represented in the conceptual model.

One of the ongoing legacies and impacts of colonialism has been the erosion of trust, caused and compounded by intergenerational trauma and severe underfunding of all services to Indigenous peoples. Eliminating and guarding against all real and perceived conflicts of interest is fundamental to ensuring that trust and good faith can be rebuilt. As such, the determination and development of the conceptual model requires full transparency, accountability, communication, and ongoing engagement with IHPs.

### 3B.2 CONSIDERATIONS FOR POLICIES AND PROCEDURES

This continued engagement process could also include identification of considerations and mechanisms for determining equitable and impartial funding allocations based on regional contexts across Ontario. This could include the cost of land, the cost of construction, and other regional and capacity differences, as well as Indigenous community housing backlogs and needs in different areas, among other key data points.



IHPs have stressed that the allocation of funds must be fair and free from real or perceived conflicts of interest, so that the funding relationship can be built on trust. Further, ongoing support must be prioritized for existing IHPs interested in undertaking development.

This process could also help inform the development of other policies and procedures to frame the new approach for delivering and funding Indigenous housing, including administrative, governance, human resources, operational, and financial policies and procedures.

### **3B.3 DETERMINE LEAD TRANSITION FOR IMPLEMENTATION PLAN**

As noted above, it is critical that the governance and execution of the Implementation Plan aligns with the guiding principles and key recommendation to ensure Indigenous leadership and direction over urban and rural Indigenous housing in Ontario. As part of the engagement process, the dedicated resource(s) should consult with the IHPs, as well as ONPHA and the URIHAC, to determine both who will continue to lead the Implementation Plan and how the transition of leadership will take place.

ONPHA can continue to support this work and transition process, while recognizing that ONPHA may not ultimately be the best suited to continue leading this work as a non-Indigenous, settler organization (governed by and accountable to a non-Indigenous Board of Directors). This transition process and its outcomes will be dependent on the ultimate conceptual model for the future funding and policy framework for Indigenous housing, determined through the engagement process.

### **3B.4 ONGOING ADVOCACY TO SECURE LONG-TERM FUNDING**

Funding required for the following Implementation Stage related to strategic planning (Phase 1) and the development of the conceptual model for Indigenous housing policy and funding (Phase 2) will be dependent on the preferred conceptual model and transition in leadership for the Implementation Plan, both to be determined through the engagement process with IHPs. Once determined, ongoing advocacy must also work to secure funding for these phases, in addition to long-term capital and operating funding for the minimum of 22,000 new urban and rural Indigenous housing units.

# STAGE 2: IMPLEMENTATION

The next steps outlined in this stage are presented as a guide. The implementation process will ultimately be dependent on the preferred conceptual model for the policy and funding framework for Indigenous housing and the lead transition to Indigenous leadership, both to be determined through continued engagement (as noted above).

As the experts and drivers of the Implementation Plan, ongoing IHP engagement will also be required throughout this stage to gather and represent broad and diverse perspectives and drive decision-making processes. IHP input should be obtained both independently and as a whole, with clear and consistent communication and opportunities for engagement throughout each of the phases below.

## PHASE 1: STRATEGIC PLANNING

The purpose of this phase is to secure long-term funding, build and strengthen partnerships, develop a strong communications strategy, explore potential funding sources and legislative changes, and identify IHP capacity development needs, laying the groundwork for Phase 2: Development of the Conceptual Model.

### 1.1 ADVOCACY

- >>> Build and strengthen partnerships with IHPs, industry, non-profit, and government
- >>> Develop communications strategy

It is essential to build, foster, and strengthen relationships with all relevant partners and stakeholders, as well as build consensus between IHPs, to ensure the Implementation Plan's success. As identified above, the current community housing context in Ontario presents a number of opportunities to work collaboratively to advance Indigenous housing solutions, including through regulatory development under Ontario's Community Housing Renewal Strategy, efforts to strengthen Canada's National Housing Strategy (especially as it relates to urban, rural, and northern Indigenous housing), and upcoming provincial and municipal elections. These key initiatives present opportunities to revisit existing structures and approaches, and help inform the development of new policies, procedures, and programs.

Transformational change requires entire systems to shift. Maintaining strong working relationships is critical to system transformation, including the construction of the required Indigenous housing units. Achieving this transformation could require revisiting and modifying laws, zoning by-

laws, province-wide and local/regional rules, as well as federal funding and ministry limitations. The associated relationships must be nurtured and encouraged through transparency and accountability in order to ensure the Implementation Plan's success.

With support from ONPHA, the URIHAC, the broad sector of IHPs, and other potential partners, a detailed plan for advocacy must be developed, including options for revised legislation. This advocacy must focus on securing the required, dedicated funding to build and operate at least 22,000 Indigenous housing units, as well as ensuring ongoing support for the existing Indigenous housing units. Much of this advocacy would happen alongside the other elements of Phases 1 and 2.

### **1.1.1 BUILD AND STRENGTHEN PARTNERSHIPS IHPS**

As noted above, the Implementation Plan reflects the priorities and direction that IHPs shared during the engagement activities that informed its development. Each recommendation included within this report is a direct result of IHP feedback.

Throughout the Implementation Stage, there are key decisions that will require further engagement with and feedback from IHPs, beyond the determination of the conceptual model for the policy and funding framework for Indigenous housing moving forward, and an equitable distribution of those funds (to be determined in the Preparation Stage noted above). Throughout the engagement activities to date, however, IHPs reached consensus on many key themes for the Implementation Plan, including the need for the new approach to be Indigenous-led and controlled, and accountable to IHPs.

#### *Support from industry and non-profit sectors*

Support from a broad range of partners that have a stake in and stand to benefit from the implementation of Indigenous housing solutions is essential to a successful advocacy campaign. These partners could include, but are not limited to, the Canadian Construction Association, Canadian Banker's Association, the Ontario Real Estate Association, the Canadian Housing and Renewal Association, the Cooperative Housing Federation of Canada, the Association of Municipalities of Ontario, the Ontario Municipal Social Services Association, the Federation of Canadian Municipalities, Chiefs of Ontario, the Métis Nation of Ontario, Tungasuvvingat Inuit, and the Ontario Federation of Indigenous Friendship Centres.

This list demonstrates the need for support from non-profit and advocacy groups, along with industry groups, as their voices can help to move the implementation forward. Developing strong working partnerships with the private, public, and non-profit sectors can serve to be part of building respectful relationships, and gaining government support in funding the Implementation Plan.

## *Support from all levels of government*

Alongside the organizations listed above are the respective federal departments and provincial ministries whose budgets stand to benefit from the implementation of Indigenous housing solutions. To date, Indigenous housing has generally been funded by and seen as the responsibility of one single source: the federal government. As noted above, to more effectively fund Indigenous housing for the long-term, all government departments and ministries who will benefit from the construction and operation of Indigenous housing should contribute to it as a strategic investment into future cost savings.

Ontario's ministries that would realize savings and gains as a result of implementing Indigenous housing solutions include, but are not limited to, the Ministries of the Attorney General, Children, Community and Social Services, Economic Development, Job Creation and Trade, Education, Finance, Government and Consumer Services, Health, Indigenous Affairs, Infrastructure, Intergovernmental Affairs, Long-term Care, Municipal Affairs and Housing, Seniors and Accessibility, Solicitor General, Transportation, the Treasury Board Secretariat, and Women's Issues. Each of these ministries currently provide and/or engage with some Indigenous services and as such, would each see financial savings as a result of the provision of safe and healthy homes for Indigenous households.

Similarly, the Canadian governmental department counterparts include the Canada Mortgage and Housing Corporation, Crown-Indigenous Relations, Economic Development, Employment, Workforce Development and Disability Inclusion, Families, Children and Social Development, Finance, Health, Housing and Diversity and Inclusion, Indigenous and Northern Affairs, Indigenous Services, Intergovernmental Affairs, Infrastructure and Communities, Justice, Labour, Mental Health and Addictions, Northern Affairs, Public Safety, Service Canada, Treasury Board, Women and Gender Equality and Youth, among others.

Beyond engaging with elected leaders and political staff, part of the ongoing advocacy and relationship building process should also involve garnering support from deputy ministers and other public servants that work in each of these government ministries and departments.

Each of these ministerial and departmental fiscal bottom lines stand to benefit from the Implementation Plan. A successful advocacy campaign would clearly communicate and promote the socioeconomic savings and benefits associated with the implementation of Indigenous housing solutions and as such, would help illustrate the shared savings that could be realized across government ministries and departments by pooling investment for Indigenous housing.

Moreover, the advocacy campaign should focus on the significant returns and savings that the investment will produce, including the lasting compound effects both immediately and well into the future. As outlined above, investing in urban and rural Indigenous housing would have broad-

reaching impacts, helping to stimulate economic growth during this unprecedented downturn (due to the COVID-19 pandemic) and ensuring communities across the province, and country, are supported sustainably for the long-term.

Importantly, no one ministry/department stands to benefit from the implementation of Indigenous housing solutions in isolation, and as such, no one ministry/department should bear the sole responsibility to resource the Implementation Plan (and ultimately contribute to the savings and gains realized across other ministerial and departmental budgets). In line with the guiding principle of maximum administrative efficiency, the advocacy campaign could promote the exploration of opportunities for all relevant ministries and departments to pool funding through one “pot” for Indigenous housing solutions.

### **1.1.2 DEVELOP COMMUNICATIONS STRATEGY**

Two distinct types of communication materials should be developed to reach the different audiences identified above: high-level communications that highlight the overall need, objectives, and approach of the Implementation Plan (to share with the IHPs, industry, and non-profit partners), and a more detailed package resembling a business plan, which would include detailed information about the Implementation Plan’s objectives, planned expenditures, and planned funding (to share with government partners).

In addition to external partner communications, ongoing communication with IHPs is critical and fundamental for the Implementation Plan’s success. As such, multiple avenues and opportunities for communication must be established to ensure IHPs can share feedback and track progress with the Implementation Plan’s leadership (which may include ONPHA and the URIHAC, in whole or in part). There should be formal and consistent channels of communication, which could include monthly reports, a direct email and phone line, and/or regular one-on-one and/or group meetings to check in on the Implementation Plan’s progress. Accountability and trust must be fostered and maintained through regular, transparent communication.

### **1.2 POTENTIAL FUNDING SOURCES**

The Implementation Plan requires significant financing, recognizing the real cost of the project, including construction and operation. It should be noted that there are many ways that governments and other partners can invest in community housing. Some of these could include land contributions, preferential financing rates, tax exemptions, and development charge waivers.

Considering the high costs and limited access to land across Ontario (especially in urban centres), surplus and underutilized federal, provincial, and municipal land should be prioritized to support the construction of Indigenous housing. Throughout the engagement activities,

IHPs identified the donation (or purchase at a nominal cost) of surplus government land toward Indigenous housing as a critical action that governments could take to advance efforts toward reconciliation with Indigenous communities (in recognition of the legacy and ongoing impacts of the dispossession of Indigenous peoples from their lands), while also ensuring a strong return on investment through the socioeconomic savings and gains associated with increased access to affordable Indigenous housing options.

Moreover, governments raise significant revenues through a number of housing-related tax initiatives. Retaining these revenues within the housing sector is critical to ensuring the system's sustainability and the long-term affordability of housing. Directing these revenues, even in part, toward community housing would present an enormous opportunity to help ensure that affordability challenges do not worsen as the housing market continues to heat up, providing an economic catalyst for housing affordability. Redirecting a portion of these revenues to implementing affordable housing solutions would go a long way to easing the pressure on the rental market and help level the playing field for Indigenous and other households in need.

For example, at the provincial level, the Land Transfer Tax was recently projected to draw in revenues of up to \$5.049 billion in 2021-22 (a 37% increase over the previous year)<sup>29</sup>; at the federal level, a new tax on vacant, non-resident residential properties is estimated to generate \$700 million in revenue over four years<sup>30</sup>. Based on an average provincial construction cost of \$330,000 per unit<sup>31</sup>, revenues from the projected provincial Land Transfer Tax for 2021-22 alone could build 15,300 new units (nearly 70% of the minimum required 22,000), while the potential revenues from the federal vacancy tax could build over 2,100 new units. While both levels of government must balance a number of competing housing affordability priorities, a portion of these revenues could be considered for reinvestment into much needed, affordable Indigenous housing.

Importantly, land contributions and the reallocation of tax revenues remain two among many tools that governments can use to resource the development of Indigenous housing. As such, the advocacy campaign would develop of a preliminary breakdown of cost savings and proportionate funding by each ministry and department, including potential funding sources and options.

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<sup>29</sup> Ministry of Finance. (2021). The 2021 Ontario Economic Outlook and Fiscal Review: Build Ontario. Available at <https://budget.ontario.ca/2021/fallstatement/index.html>

<sup>30</sup> Government of Canada. (2021). Budget 2021: A recovery plan for jobs, growth, and resilience. Available at: <https://www.budget.gc.ca/2021/home-accueil-en.html>

<sup>31</sup> Average cost per unit (2018) for residential construction in Ontario used in *URIHPO*, based on contractor estimates and averaged to reflect proforma costs. It should be noted that construction costs vary significantly across the province, and construction costs do not reflect the cost of land (which also fluctuates greatly by region).

### 1.3 LEGISLATIVE CONSIDERATIONS

The current legislative framework for community housing in Ontario presents several challenges to the implementation of Indigenous housing solutions. Throughout the engagement activities, IHPs frequently cited legislative restrictions as barriers impeding their operations and opportunities for development, including municipal by-laws and zoning requirements, as well as provincial housing legislation and regulations. In many cases, meeting by-law requirements for construction can add significant time to the development process for community housing, whether purchasing existing housing or land for new construction.

As part of the Implementation Plan process, IHPs noted the need for changes that facilitate rather than hinder the development process at the municipal level, in particular to support the creation of Indigenous community housing. One successful example noted through the engagement is the waiving of education development charges for the development of Indigenous housing by the Toronto Catholic District School Board<sup>32</sup>. IHPs emphasized that this exemption serves to both facilitate the construction of Indigenous housing, while also helping to address the ongoing legacy and impacts of colonialism (in particular the role of the Catholic Church in the residential “school” system) and action on the recommendations in the Truth and Reconciliation Commission.

At the provincial level, the Assessment Act provides property tax exemptions to registered charities with land that is used for charitable purposes; however, many community housing providers, including IHPs, are not eligible for this exemption. Other provincial legislation (the Municipal Act and the City of Toronto Act) allows municipalities to enter into “municipal capital facilities agreements” with community housing providers without charitable status. These agreements offer providers municipal tax exemptions or reductions, among other things. This tool has benefited many community housing providers, but there are significant inconsistencies with how it is used across the province<sup>33</sup>.

The exemption of property taxes is one among many critical tools that could be used to advance Indigenous housing solutions, and as such, could be explored as an area for legislative change. This could involve granting charitable status to community housing providers and/or exempting providers from property taxes altogether. Legislation requiring consideration could include, but is not limited to, the Assessment Act, 1990, the Municipal Act, 2001, the City of Toronto Act, 2006, the Housing Services Act, 2011 (see above for opportunities through regulation

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<sup>32</sup> Toronto Catholic District School Board. (November 2021). Report to Regular Board: Waiver of Education Development Charges - Indigenous-led and City-supported Affordable Rental Housing. Available at: <https://tcdsbpublishing.escribemeetings.com/filestream.ashx?DocumentId=24159>

<sup>33</sup> For more information about Ontario’s property tax system, see: Ontario Non-Profit Housing Association. (2017). What’s going on with Ontario’s inconsistent property tax system? Available at: <http://qc.onpha.on.ca/2017/08/whats-going-on-with-ontarios-inconsistent-property-tax-system/>

development), the Not-for-Profit Corporations Act, 2010 (proclaimed on October 19, 2021 after over a decade), the National Housing Strategy Act, 2019, and the Income Tax Act, 1985.

As part of the ongoing advocacy efforts for the Implementation Plan, federal, provincial, and municipal legislation that create barriers to the successful development of Indigenous community housing should be monitored, in addition to tracking developments and successes as legislation, regulations, and/or by-laws are modified. This data can be shared through advocacy efforts and further used in Phase 2.

## **1.5 IDENTIFY IHP CAPACITY DEVELOPMENT NEEDS**

Throughout the engagement activities, IHPs identified different capacity levels and resources across the sector. Some IHPs have extensive experience undertaking development projects, while others are limited by their capacity and resource levels (especially smaller IHPs often operating in rural, remote, and northern areas of the province). Moreover, there are some Indigenous-serving organizations who may not currently provide housing but are interested in doing so.

As such, the new approach for delivering and funding Indigenous housing must include capacity development and ongoing support to ensure all IHPs can remain sustainable and continue meeting community needs for the long-term, regardless of their size, location, etc. This could include assuming an incubator role, which could offer policy and procedural templates, seed funding, and/or training to new and/or developing housing organizations. For IHPs with more existing capacity, it could also provide bridge funding, architectural support, or cover mechanical and electrical engineering costs. Additional capacity development resources could include project management and property management training packages.

The designated leadership for the Implementation Plan (to be determined through the engagement process outlined above), along with the potential support of ONPHA, the URIHAC, and other partners, could engage with IHPs to determine the demand, scope, and amount of funding required for these types of supports across the Indigenous housing sector, and develop timelines for their implementation as part of the new approach to funding and delivering Indigenous housing.



## PHASE 2: DEVELOPMENT OF CONCEPTUAL MODEL

### 2.1 FUNDING AND LEGISLATIVE CHANGES

- >>> Secure required capital and operational funding
- >>> Obtain legislative modifications needed for implementation
- >>> Continue engaging with IHPs on advocacy strategy

Building on the momentum from the Strategic Planning Phase, Phase 2 should prioritize securing the required funding for the ongoing implementation process, including the development of the conceptual model and the large-scale construction and operation of at least 22,000 Indigenous-owned and operated community housing units.

This Phase should also include engagement with relevant government committees, elected officials, and staff to address the barriers in the current legislative framework, leading to significant inequities for community housing providers, and IHPs in particular. This Phase should build on the groundwork laid through the development and assessment of the *URIHPO* and ongoing advocacy across the community housing sector, and seize on opportunities to work with partners to advance shared advocacy priorities.

As identified in the previous Phase, ongoing and active engagement with IHPs is critical throughout all decision-making processes, recognizing the role that IHPs can play to advance the advocacy agenda, as they also engage regularly with different levels of government and other funders. As such, maintaining accountability and transparency with IHPs through regular communication and engagement must remain a key part of Phase 2.

### 2.2 FINALIZE POLICIES AND PROCEDURES ACCORDING TO THE CONCEPTUAL MODEL

- >>> Finalize administrative, governance, human resources, operational, and financial policies and procedures
- >>> Finalize forms, funding applications, and reporting procedures
- >>> Finalize budget modelling for capital infrastructure development and operation
- >>> Finalize capacity development policies and resources

Following the determination of the preferred approach for delivering and funding Indigenous housing based on IHP engagement in the Preparation Stage above, this Phase would involve the development of policies and procedures to ensure that funding for Indigenous housing can be

delivered effectively and efficiently to IHPs once secured.

This Phase must include the development and validation with IHPs of the administrative, governance, human resources, operational, and financial policies and procedures for the new approach, including, but not limited to:

- Proposed governance structure for the conceptual model, including an impartial and equitable oversight framework that adheres to FIBI principles
- Program forms, funding applications, and reporting procedures
- In-depth budget modelling and analysis for the required capital and operation expenses over the 10-year construction program
- Capacity development resources (e.g., educational toolkit, templates, etc.)

This Phase must identify all opportunities to streamline and simplify all processes related to the delivery and administration of Indigenous housing funding, ensuring fair and equitable access for all IHPs. It is critical that funding is secured for both project planning, as well as for Indigenous housing construction and operation, to ensure the implementation can bring about the expected socioeconomic savings and gains for Ontario outlined (at a minimum) in the *URIHPO*.

### **2.3 IMPLEMENT OVERSIGHT FRAMEWORK**

The FIBI principle must lead all aspects of the Implementation Plan and the desired transformation of the Indigenous housing system; this must include the oversight of the conceptual model and new approach to Indigenous housing policy and funding. Oversight and accountability mechanisms must be established, which should include the development of policies for the equitable, fair, and transparent allocation of capital and operational funding, as well as the determination of eligible expenses.

The development and implementation of these processes should take place alongside ongoing, clear communication with IHPs as part of the development of the new conceptual model for Indigenous housing.

### **2.4 IHP CAPACITY DEVELOPMENT**

Recognizing the significant capacity required to manage the construction and/or acquisition of at least 2,200 units per year across the province, the identification of IHP capacity development needs (as outlined in Phase 1 above) could help determine each IHP's level of preparedness to undertake a major expansion project in their area.

This Phase could involve providing training and capacity development for IHPs in relevant areas, including project management, educational toolkits and other resources, and access to seed funding for IHPs with limited capacity to hire additional resources, such as a project manager.

## **2.5 EXPLORE DATABASE NEEDS AND DEVELOPMENT OPPORTUNITIES**

For a variety of reasons, Indigenous people may not be accurately represented through current government data systems (e.g., Census data). As a result, some Indigenous communities feel that such information severely underrepresents the accurate size and composition of Indigenous populations throughout Ontario (and Canada), in turn producing conservative estimates related to both community need, as well as system savings and benefits. The lack of standardized data is a major obstacle in the development and sustainability of Indigenous community housing.

As such, there is a critical need for comprehensive, community-supported Indigenous housing data to accurately measure and represent the current and future needs, gaps, and capacity in the sector. Such data is crucial to ensuring that investments and programs are meeting diverse community needs, while also building trust and good faith with Indigenous communities.

Data should be collected throughout each part of the development process (e.g., planning, construction, and operation/management), which would help inform ongoing advocacy around potential legislative changes, policy developments, and funding opportunities to further support IHPs.

To ensure data is accessible for such purposes, the development of the conceptual model could include the exploration of database needs and development opportunities, based on engagement with IHPs. While IHPs generally agreed on the need for better and community-owned data throughout the engagement activities, they also noted the need to ensure that the development of a potential Indigenous housing database is implemented effectively and efficiently to avoid additional capacity and resource strains on IHPs.

IHPs also noted that current reporting requirements are overly burdensome and often duplicate efforts. As such, IHPs identified that they would support opportunities to streamline reporting processes, which could be supported through the development of a potential Indigenous-owned and operated database.

## PHASE 3: CONSTRUCTION PROGRAM

To complete the significant development required for the Implementation Plan, the construction program is projected over a minimum of 10 years, as outlined in the *URIHPO*, with ongoing operations to continue meeting community needs. As community experts on the ground, IHPs must lead all aspects of the development process. The conceptual model and funding framework must ensure an efficient, transparent process for IHPs to submit proposals and secure funding for development, prioritizing an equitable distribution of funding based on community needs and IHP capacity (including support to build capacity among existing IHPs, as identified above). The following section provides a high level guide related to building at least 22,000 new subsidized Indigenous-owned and operated housing units in urban and rural regions across Ontario.

### 3.1 BUILD/BUY HOUSING UNITS TO MEET CURRENT AND FUTURE NEEDS

Among the key initial decisions for IHPs in the development process is whether to build new and/or buy existing housing units to support the construction program across the province. These decisions would consider and reflect local contexts, including, but not limited to, community needs, available financing, available land, existing management capacity, local (municipal) regulations, and desired building strategies.

IHPs must be able to access dedicated capital to fund development through a streamlined application process, which would support the acquisition of land and/or existing units. Importantly, funding must ensure sufficient capacity for the IHP to undertake the construction program. Funding available through Canada's National Housing Strategy has supported some of this preliminary work, and must continue to be available and accessible to IHPs in order to meet the large, growing needs of urban and rural Indigenous communities (in addition to other funding sources as identified above).

As noted above, surplus and underutilized federal, provincial, and municipal land should be prioritized to support the construction of Indigenous housing. The donation (or purchase at a nominal cost) of surplus government land toward Indigenous housing would also send a strong signal in advancing efforts toward reconciliation with Indigenous communities.

In addition to the purchase of existing residential units, this phase could also explore opportunities to convert unused commercial properties (e.g., office buildings left vacant as a result of the COVID-19 pandemic and shift to remote work options) into deeply affordable, Indigenous housing units<sup>34</sup>.

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<sup>34</sup> For more information on community-based housing acquisition strategies, see: Pomeroy, S. (2020). Why Canada needs a non-market rental acquisition strategy. Available at: <https://www.focus-consult.com/why-canada-needs-a-non-market-rental-acquisition-strategy/>

Supports should be available throughout the construction program to ensure the development process aligns with best practices in construction and construction management, as outlined by the Canadian Construction Association<sup>35</sup>, including access to external resources and professional services as needed (e.g., architecture, engineering, legal services, accounting, project management, etc.).

## 3.2 ONGOING IHP CAPACITY DEVELOPMENT

Ensuring sufficient capacity to undertake and complete the construction program would require ongoing review, as well as training, hiring, and retention strategies, relative to the size of the project. As identified above, it is critical that existing IHPs have access to capacity development supports and that those interested in development are prioritized under the new funding framework to ensure IHPs remain sustainable and can continue to support their communities for the long-term.

## 3.3 UNDERSERVED AREAS

As identified in the *URIHPO*, there are significant gaps in access to Indigenous housing services across the province, including in areas where an IHP does not currently exist or operate. As identified above, existing IHPs interested in development and expansion must be prioritized in the conceptual model and funding framework to meet those needs, including access to capacity development supports to ensure they can operate sustainably.

In addition, some Indigenous-serving organizations that do not currently provide housing services may be interested in doing so in support of the Implementation Plan (especially if dedicated funding is available to support such a transition). In the event that no IHPs are interested in and/or available to expand into underserved areas, opportunities could be explored to support other Indigenous-serving organizations in transitioning to provide housing services. This could include leveraging existing supports (e.g., through Canada's National Housing Strategy programs) and/or incorporating this function into the new conceptual model for the delivery and funding of Indigenous housing in Ontario.

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<sup>35</sup> See: Canadian Construction Association. (2021). Best practices services. Available at: <https://www.cca-acc.com/best-practices-resources/>

## **PHASE 4. REFLECTION, ASSESSMENT, AND ADJUSTMENT**

Reflection, assessment, and adjustment are essential to ensure a project's success, efficacy, and efficiency, while also meeting funder requirements and providing transparency and accountability to other partners and stakeholders. This phase extends throughout the entirety of the Implementation Plan to ensure flexibility in decision-making in consultation with IHPs, and that adjustments to processes, planning, and approaches can be made as required.

As identified above, among the Implementation Plan's key guiding principles and priorities is maximum administrative efficiency. As such, this phase should ensure a streamlined and efficient approach to reporting. At a minimum, reporting on project development should include:

- Financial standing and contract management
- Status on construction or purchase
- Identification of any challenges and/or new opportunities (e.g., access to materials)
- Updates on relationships with relevant government officials (e.g., with respect to meeting regulatory or other requirements)

This reporting process could also provide each IHP Board of Directors with updates on the status of development projects in their area and across the province, and in turn, provide opportunities to facilitate cross-sector information sharing and partnership building. The objective of Phase 4 is to monitor progress and adjust as required to ensure the best suited model for providing equitable, transparent, accountable funding for IHPs to grow their housing stock.



# FINAL CONSIDERATIONS

## Timing

The timeline for a strategy of this magnitude is greatly dependent on access to and availability of adequate funding for all aspects and phases of the Implementation Plan, including ongoing engagement and strategic planning to determine and develop the new approach to funding and delivering Indigenous housing, capital costs for the development of at least 22,000 new urban and rural Indigenous housing units, and long-term operating costs that ensure ongoing access to culturally-relevant programming.

## Funding

### *Continued Engagement*

To ensure this critical work can get underway, initial funding is needed to continue the engagement process with IHPs to reach consensus on a preferred conceptual model and delivery mechanism for Indigenous housing funding (Preparation Phases 3a and 3b). This process would also help determine the lead transition for the subsequent implementation phases to align with the guiding principles and key recommendation for an Indigenous-led approach.

At a minimum, this process would cost **\$200,000** (estimated to span over one year). However, ONPHA and the URIHAC (and other potential partners) could run a request for proposals process to better scope the work and refine the funding required, based on competitive bids received from subject matter experts in this field (i.e., related to culturally-appropriate and informed engagement, mediation, consensus-building, etc.).

### ***Strategic Planning and Development of Conceptual Model***

Funding required for the strategic planning work and development of the conceptual model for Indigenous housing policy and funding will be dependent on the preferred conceptual model and transition in leadership for the Implementation Plan, both to be determined through the continued engagement process with IHPs.

### ***Construction***

As outlined in the *URIHPO*, a minimum of **\$7.3 billion** is required over 10 years for the construction program to build at least 22,000 new urban and rural Indigenous housing units to meet current and growing needs.

### ***Operations***

In addition to securing funding for ongoing engagement, strategic planning, development of the conceptual model, and the construction program, it is essential that IHP operations are funded sustainably for the long-term to ensure diverse community needs can be met, while realizing the widespread socioeconomic gains and savings across the province.

Throughout the engagement activities, IHPs emphasized the critical need for access to ongoing funding for operations as a fundamental priority for the Implementation Plan, considering that it is a key challenge facing IHPs today and threatening the long-term sustainability of their organizations (and their ability to support their communities).

At a minimum, the *URIHPO* identifies the need for **\$2.5 billion** in operating funding for the associated 22,000 units over 10 years.





## CONCLUSION

The *Urban and Rural Indigenous Housing Plan for Ontario (URIHPO)* provided six key recommendations to meet the significant and growing needs of Indigenous households in urban and rural areas across Ontario (off-reserve), while ensuring broad-reaching socioeconomic savings and gains. While federal, provincial, and municipal governments each hold constitutional and fiduciary obligations to provide financial, legislative, and regulatory support to advance Indigenous housing solutions, it is equally important that these solutions are Indigenous-led, controlled, owned, and operated in alignment with the principles of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

In the current system, Indigenous housing providers operate under significant constraints and face numerous barriers to success, including but not limited to, limited access to and availability of funding, administrative and legislative barriers to development, and inconsistent relationships with and requirements from Service Managers. In the context of a considerable and growing demand for Indigenous housing options across Ontario (and Canada), these conditions lead to tremendous backlogs, while demand continues to grow. The existing system for administering, funding, and developing policy for Indigenous housing has failed to meet this demand. The *Urban and Rural Indigenous Housing Implementation Plan for Ontario* presents strategic, Indigenous-led solutions, premised on transformational change, to meet the need for Indigenous-owned and operated community housing in Ontario.

The *URIHPO* identified significant returns on investment to federal, provincial, and municipal governments related to the provision of sufficient Indigenous community housing that meets community needs. Access to safe, affordable, culturally-supportive housing leads to positive outcomes across sectors and indicators, including but not limited to, health, education, employment, income, justice-system involvement, and other social determinants of health. To be able to meet the substantial needs identified (and likely underestimated) in the *URIHPO*, the Implementation Plan must be bold. The outcomes will be equally bold, compounding their benefits for generations to come.

Existing Indigenous housing providers in Ontario have expressed a strong desire and readiness to implement Indigenous housing solutions, recognizing the need for support from federal, provincial, and municipal governments, along with other key partners and stakeholders in the private and non-profit sectors. The Implementation Plan requires ongoing, thorough collaboration with Indigenous housing providers across the province to ensure broad participation and representation of diverse community perspective and priorities.

Ongoing advocacy is also required to engage with all government departments and ministries that will realize savings and gains through the Implementation Plan. With a strong focus on maximizing administrative efficiency, the Implementation Plan also aims to streamline processes in order to focus on producing strong, outcomes-based service delivery results.

Strategic planning with clear lines of accountability, transparency, and ongoing communication with Indigenous housing providers and all other relevant partners and stakeholders is a critical component of the Implementation Plan. Ultimately, the goal of the Implementation Plan is to achieve transformational change in the way that Indigenous community housing is delivered in Ontario: change that elicits tangible results for Indigenous communities in need, while providing equitable funding for a chronically under-resourced and vital community sector.

Not only will Indigenous communities across the province benefit from the Urban and Rural Indigenous Housing Implementation Plan for Ontario, but the impacts will also be felt across Ontario as a whole. With renewed public attention on the need to advance reconciliation with Indigenous communities and respond to the recommendations in the final reports of the Truth and Reconciliation Commission and the Inquiry into Missing and Murdered Indigenous Women and Girls, as well as regulatory development under Ontario's Community Housing Renewal Strategy, provincial and municipal elections on the horizon, and opportunities to strengthen Canada's National Housing Strategy, now is the time for bold, swift action to implement Indigenous-led housing solutions across Turtle Island.

# APPENDIX 1 – SURVEY AND ENGAGEMENT SESSION FINDINGS

As identified in the body of the report, it is important to note that the data and feedback below represent what was gathered from the Indigenous housing providers (IHP) that participated in the survey and/or other engagement activities. As such, it does not represent fulsome data or feedback from the broader Indigenous community housing sector in Ontario.

## Survey Results

An electronic survey was undertaken as the initial step in the engagement process that informed the development of the Urban and Rural Indigenous Housing Implementation Plan for Ontario. The survey was sent to all IHPs in Ontario (n=51)<sup>36</sup>. For analytical purposes, housing providers were identified by four key geographic areas in the province based on the current distribution of IHPs: the Greater Toronto Area (GTA), Southern Ontario, the Near North, and Northern Ontario.

### *The Dashboard*

The survey was sent to 51 IHPs and viewed 79 times (i.e., the number of times the survey was opened and examined). The survey architecture allowed respondents to begin, pause, and return to complete the survey at a later time. The average survey completion time was 48 minutes. 30 total responses were received (58.8% response rate), of which 17 respondents completed every question in the survey (33.3% full completion rate).

Respondents proportionally represented the four key geographic areas across the province (21.1% in the GTA, 36.8% in Southern Ontario, 31.6% in Near North, 10.5% in Northern Ontario). The survey asked respondents if they operated in multiple regions: 76.2% indicated that they did not.

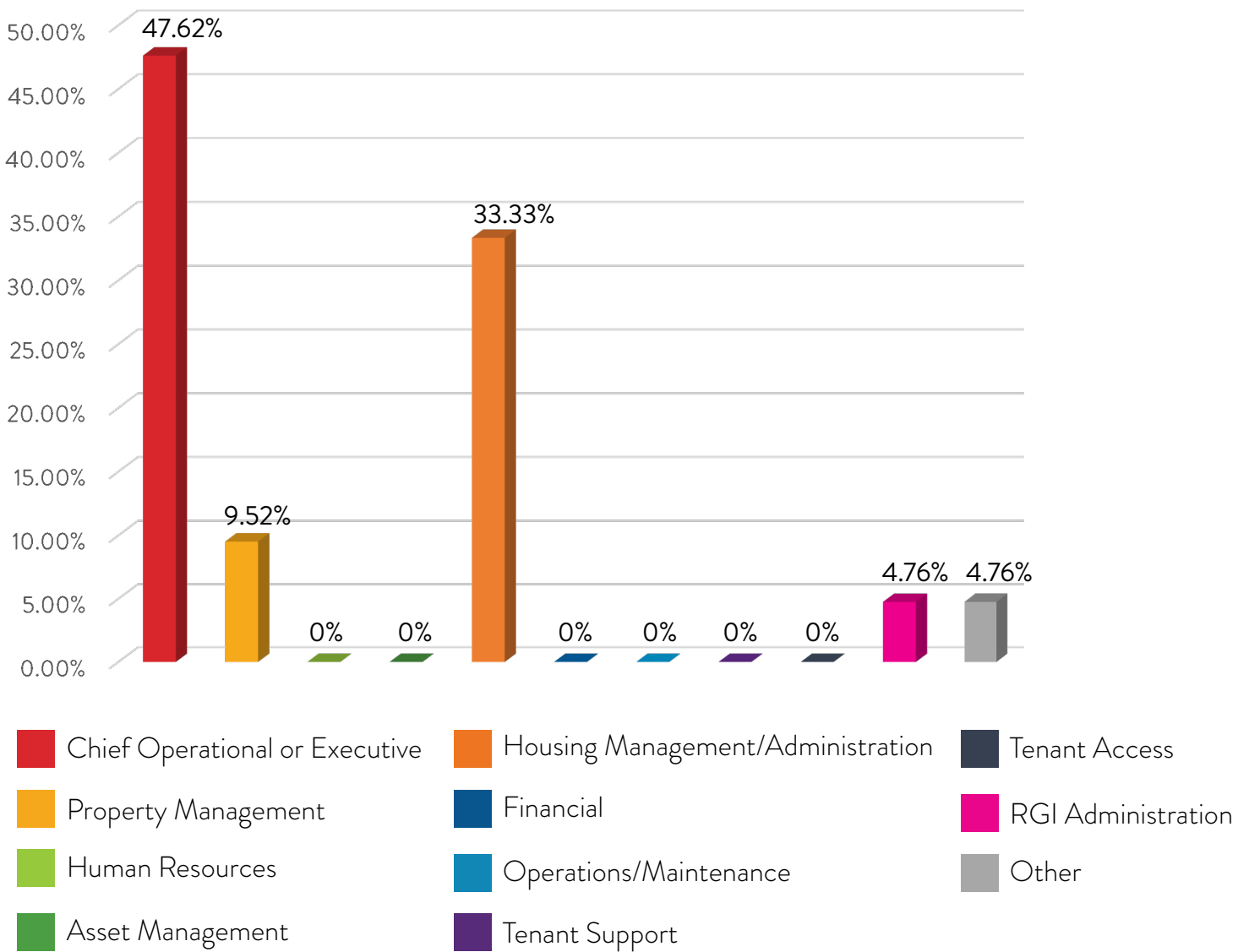
Survey respondents were asked about their organizational roles: 47.6% held executive roles, 33.3% were housing managers or administrators, and 9.5% were property managers (Figure 2).

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<sup>36</sup> Due to data limitations and the evolving landscape of the Indigenous community housing sector, it is difficult to identify the exact number of Indigenous housing providers operating in Ontario. This is partially due to housing providers merging and/or assuming leadership over other providers. ONPHA and Daniel J. Brant & Associates, in consultation with the Indigenous program administrators in Ontario, determined contact information for 51 unique Indigenous housing providers. Between the formation of that list in early 2021 and the publication of this report, these numbers may have shifted.

**Figure 2. Respondents' organizational roles**

Note: RGI refers to rent-geared-to-income



## Priorities

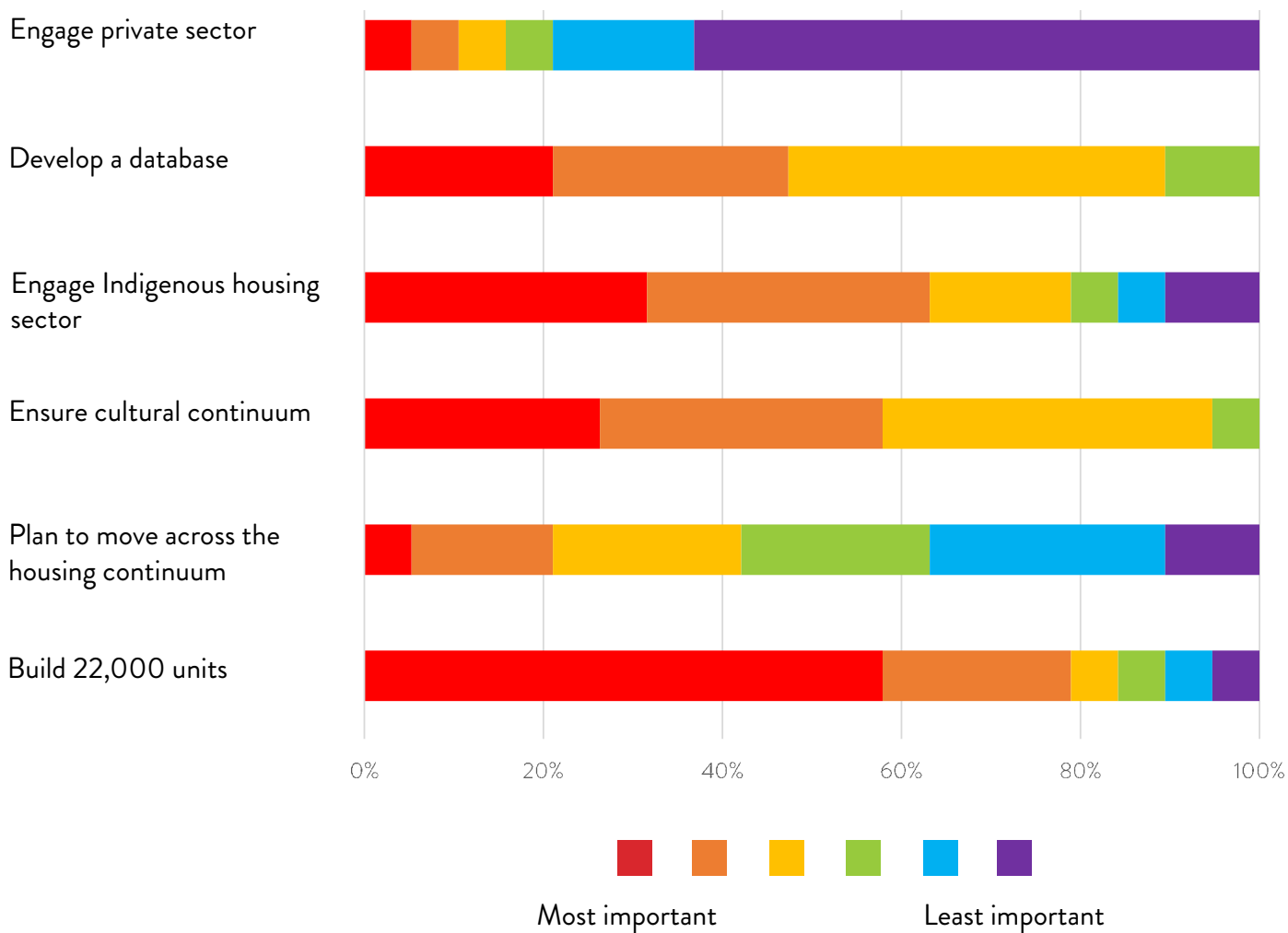
The Urban and Rural Indigenous Housing Plan for Ontario (*URIHPO*) (2020) contains the following six recommendations:

1. Set out a 10-year housing program to build 22,000 subsidized Indigenous-owned and operated units to address core housing need
2. Provide a support plan to encourage Indigenous people to move along the housing continuum
3. Develop support programs to ensure cultural continuum
4. Engage the Indigenous community housing sector to leverage opportunities to increase Indigenous control, management, vision, and direction in the sector leading toward the implementation of the *URIHPO*
5. Develop a comprehensive database of the Indigenous community housing sector
6. Leverage opportunities to engage the private sector through the use of tax and other incentives

Survey respondents were asked to reflect on the six recommendations and prioritize them by level of importance (i.e., ranking the most important recommendation at “1” and the least important at “6”).

Respondents rated Recommendation 1 (build 22,000 units) as the highest priority, while Recommendation 6 (engage the private sector) was ranked the lowest priority. Recommendation 4 (engage the sector to increase Indigenous control) was ranked the second highest priority (Figure 3).

**Figure 3. Respondents' prioritization of the six URIHPO recommendations**



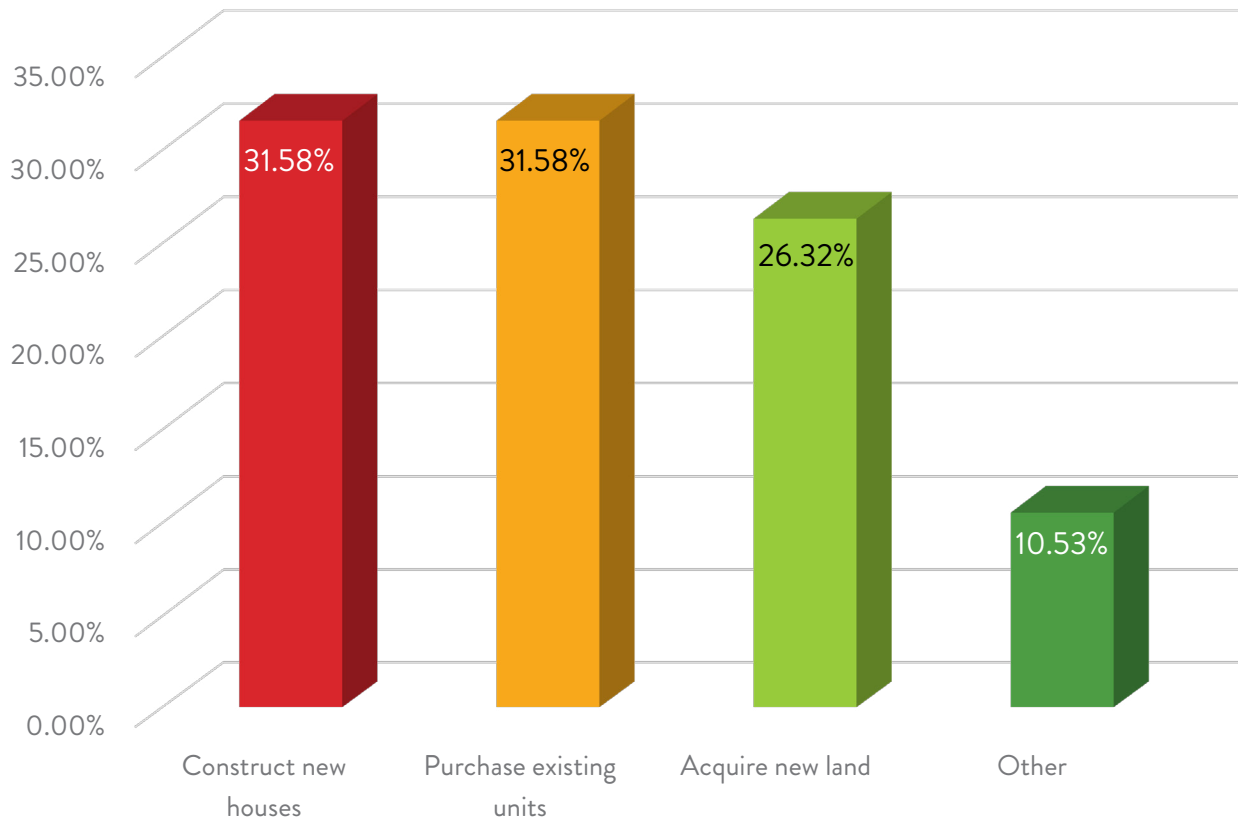
Respondents were asked if the number of units identified in the *URIHPO* (22,000) was an accurate assessment for the level of need. 37.5% of respondents agreed the number was accurate; 62.5% reported that more than 22,000 units are needed over the next 10 years to meet community need/demand. No respondents indicated that the number was too high.

When quantifying the required number of units, the *URIHPO* identified the “limited data currently available and acknowledge[d] the lack of standardized data as a major obstacle in the development and sustainability of Indigenous community housing. As such, the results of the report are conservative estimates of demand and cost savings and benefits” (p. 4). Nevertheless, 87.5% of respondents considered the *URIHPO* to be achievable.

## Acquisition

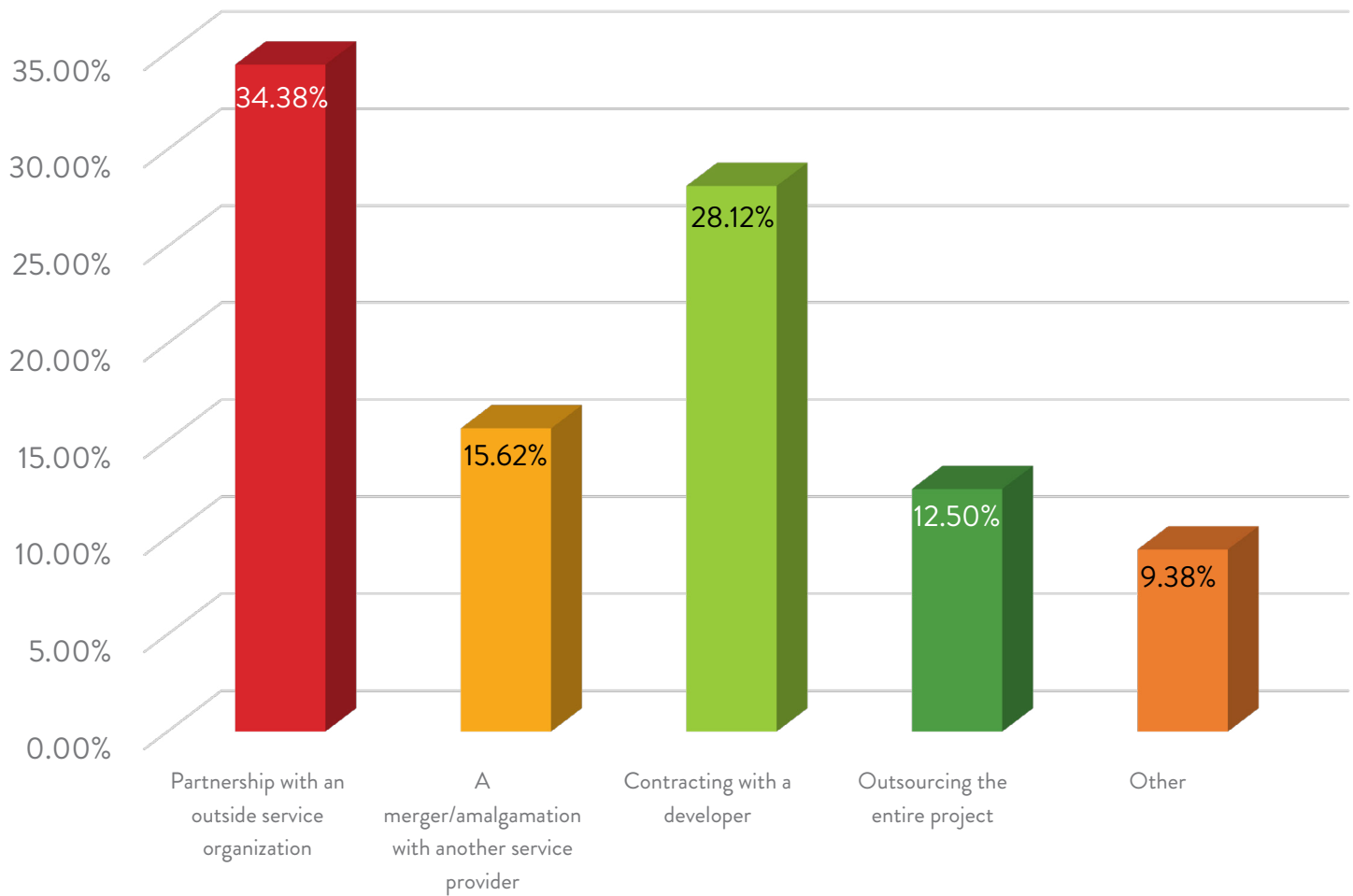
Respondents were asked about best approaches to acquire the needed units. 31.6% of respondents each indicated the need for new construction and the purchase of existing units to build the required units. 26.3% also indicated that new land would need to be acquired (Note: respondents could select multiple responses to this question) (Figure 4).

**Figure 4. Best approaches to acquire needed housing units**



As a follow-up question, respondents were asked about how to achieve the best approaches to acquisition. 34.4% of respondents identified partnerships with an outside service organization, 28.1% identified contracting with a developer, 15.6% identified mergers or amalgamations with another service provider, and 12.5% indicated that the entire project could be outsourced (Note: respondents could select multiple responses to this question) (Figure 5).

**Figure 5. How to achieve best approaches to acquire needed housing units**



### **Management and Governance**

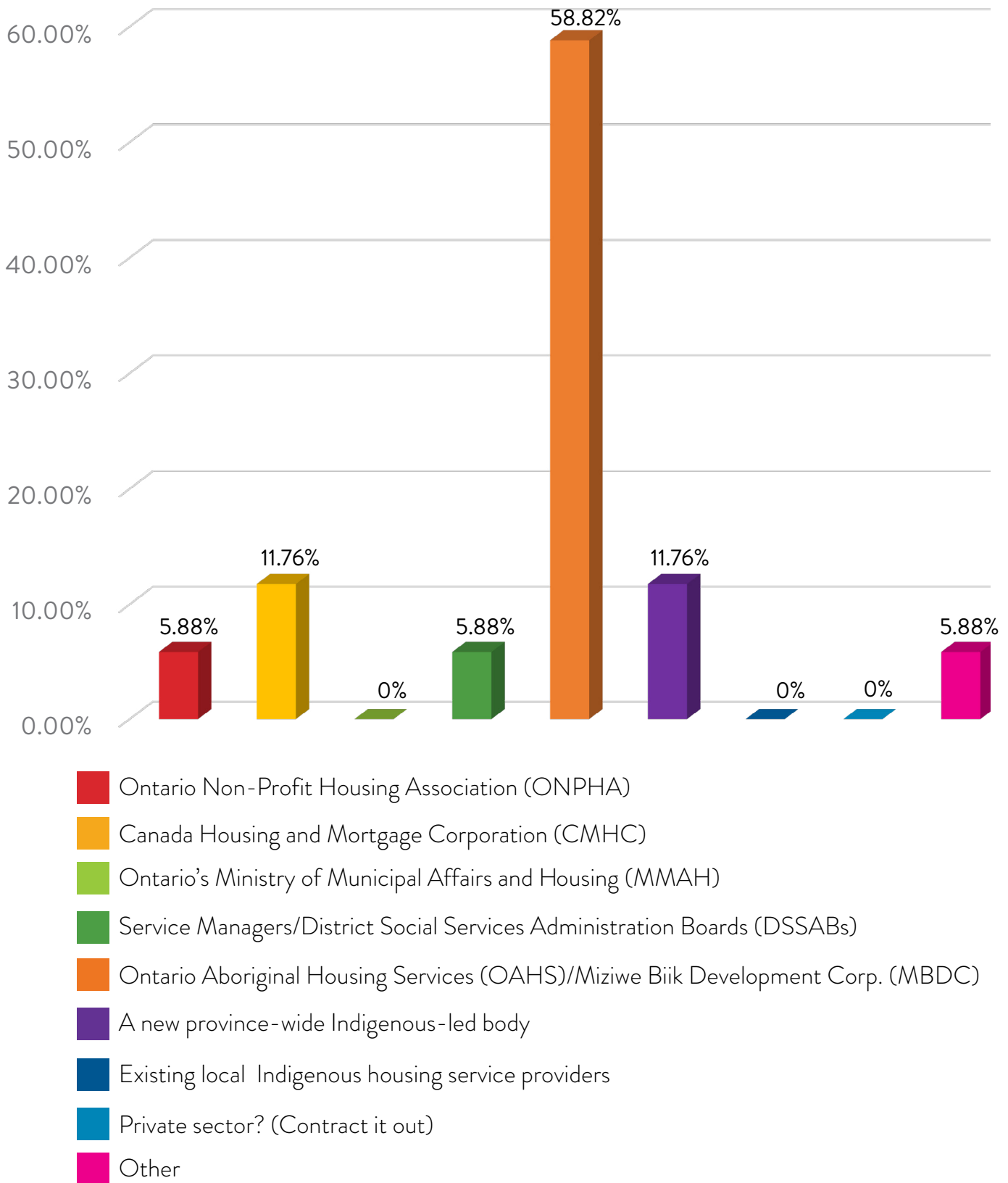
Participants were asked to share their perspectives on who should manage the implementation of Indigenous housing solutions to meet the funding, construction, operating, and other objectives identified in the *URIHPO*. For clarity, this question related to the overall management of the implementation, not management of Indigenous housing providers themselves (recognizing the critical importance of agency and ownership remaining with providers). With respect to administration of the implementation process, respondents were asked to select one of nine potential options. 58.8% of respondents identified the two existing Indigenous program administrators<sup>37</sup> to administer the implementation, with 11.8% each identifying CMHC and a new province wide Indigenous-led body (Figure 6).

<sup>37</sup> Ontario Aboriginal Housing Services (OAHS) and Miziwe Biik Development Corporation (MBDC)



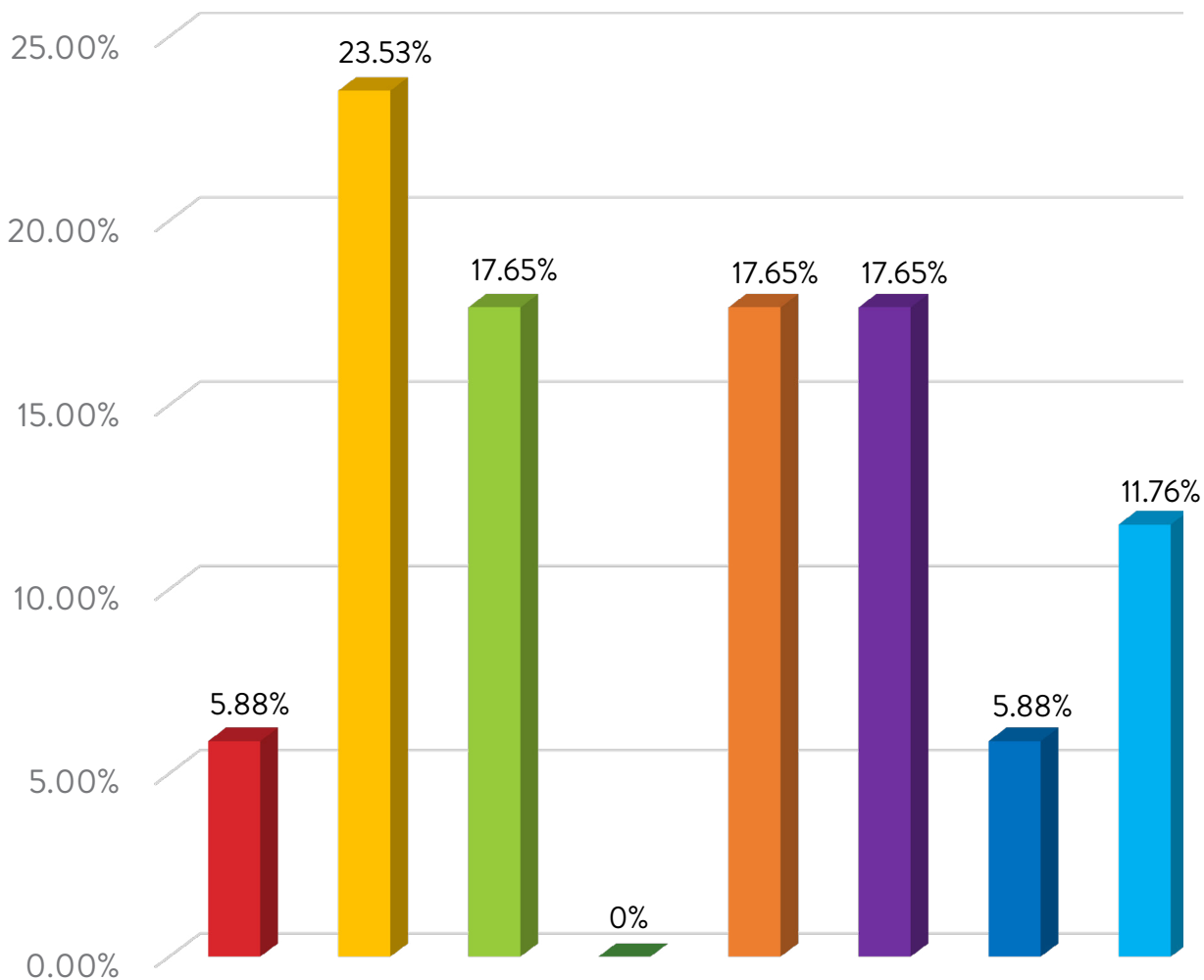
### Figure 6. Administration of the implementation of the URIHPO

Note. CMHC = Canada Mortgage and Housing Corporation; DSSABs = District Social Services Administration Boards; MMAH = Ministry of Affairs and Housing; OAHS = Ontario Aboriginal Housing Services; ONPHA = Ontario Non-Profit Housing Association; MBDC = Miziwe Biik Development Corporation.



Respondents were also asked to consider who should have oversight over the implementation process to ensure accountability to IHPs, tenants, and communities (i.e., at the policy/board level). Approximately 40% of respondents identified a federal or provincial housing body, with 23.5% preferring CMHC and 17.7% preferring MMAH. Approximately one-third selected a new Indigenous-led body (17.7%) or the existing Indigenous program administrators (17.7%). Significantly, no respondents identified Service Managers for this role (Figure 7).

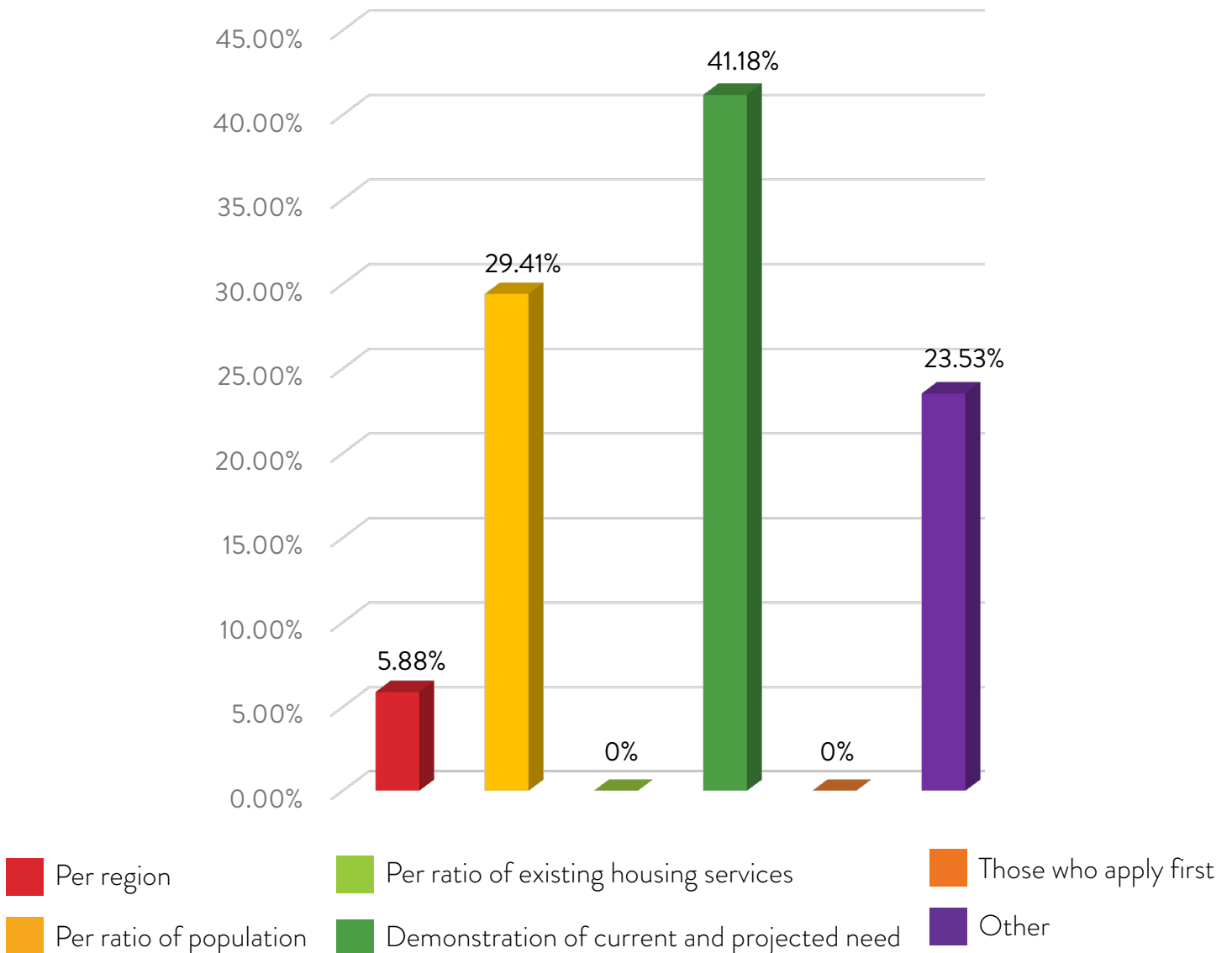
**Figure 7. Oversight of the implementation of the URIHPO**



- Ontario Non-Profit Housing Association (ONPHA)
- Canada Housing and Mortgage Corporation (CMHC)
- Ontario's Ministry of Municipal Affairs and Housing (MMAH)
- Service Managers/District Social Services Administration Boards (DSSABs)
- Ontario Aboriginal Housing Services (OAHS)/Miziwe Biik Development Corp. (MBDC)
- A new province-wide Indigenous-led body
- Existing local Indigenous housing service providers
- Other

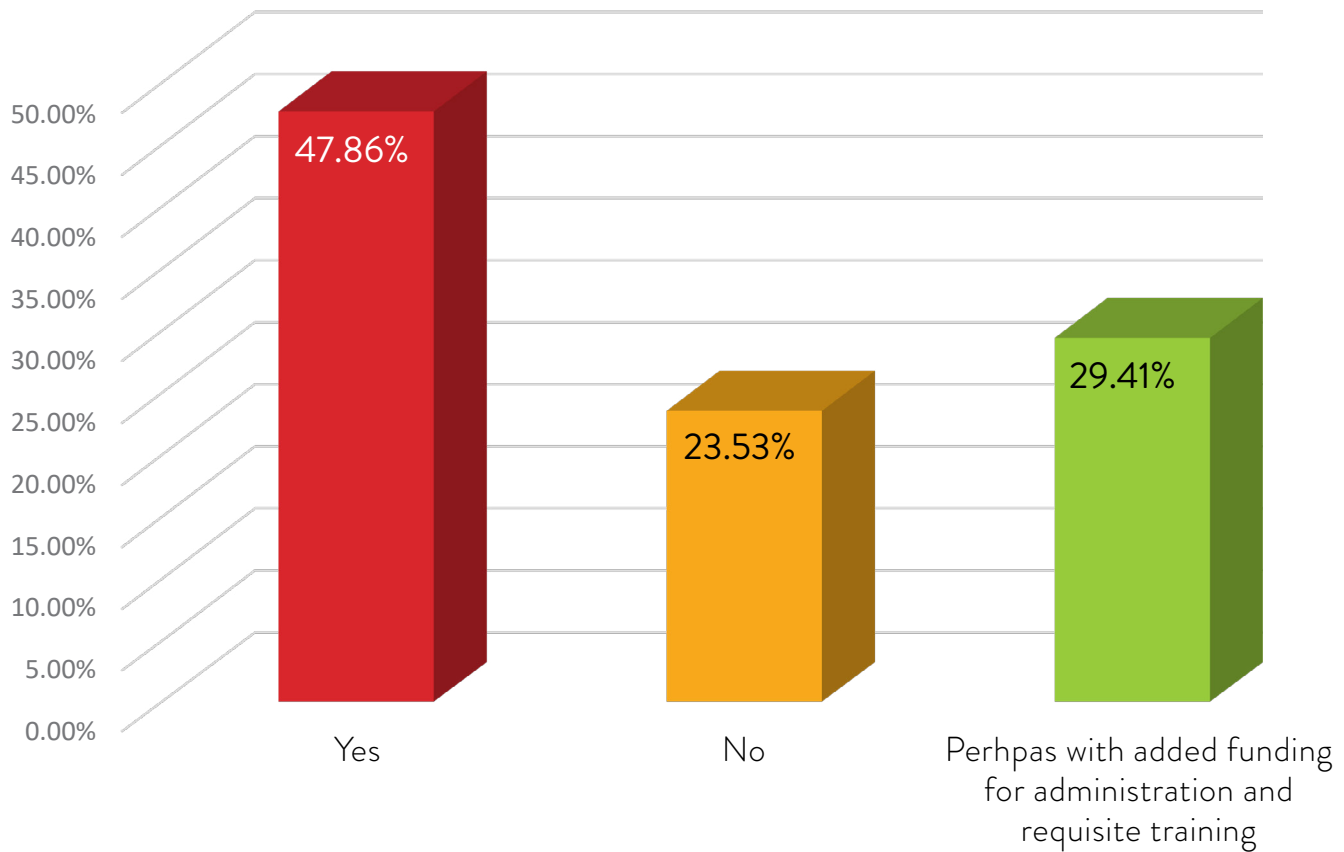
Respondents were asked how capital funding should be allocated (assuming sufficient funding is available). 41.2% of respondents identified funding should be allocated based on current and projected need and 29.4% of respondents selected allocation by population. Other responses identified readiness and collaboration with other local housing developments (Figure 8).

**Figure 8. Allocation of capital funding**



In recognition of capacity issues among Indigenous housing providers, respondents were asked if their organization had the capacity to manage a significant development process. 47.1% of respondents answered in the affirmative, with 29.4% indicating the possibility with access to additional funding and training (Figure 9).

**Figure 9. Capacity to manage the development process**

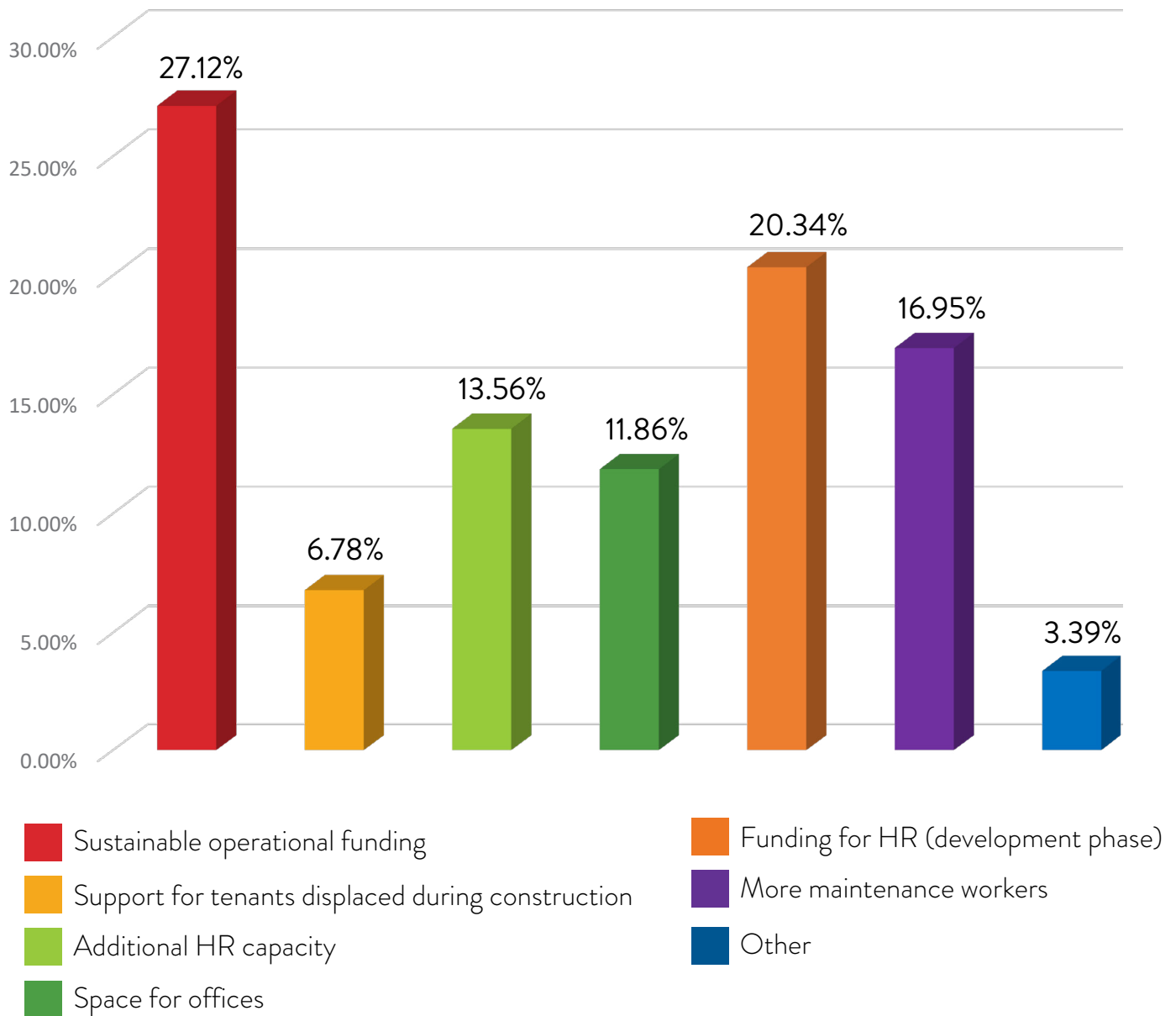


Similarly, respondents were asked if they had the capacity to manage the growth of their housing inventory and associated services. 64.7% of respondents answered in the affirmative, with 23.5% indicating a positive response if they had more resources.

Respondents were also asked about required organizational supports to support a substantial increase in number of units. Respondents identified the need for sustainable funds for operations (27.1%), funding for human resources to support development (20.3%), and additional maintenance personnel (17%) (Note: respondents could select multiple responses to this question) (Figure 10).

**Figure 10. Organizational supports required to support portfolio expansion**

Note. HR = Human Resources



Respondents were asked if their Board of Directors would have to change to manage the construction project. 52.9% of respondents provided a negative response, while 29.4% identified it as a consideration.

When asked about key challenges to the acquisition of 22,000 new housing units, 47.1% of respondents noted the main issue was the need for more funding, with 29.4% identifying the need for less bureaucracy or “red tape”.

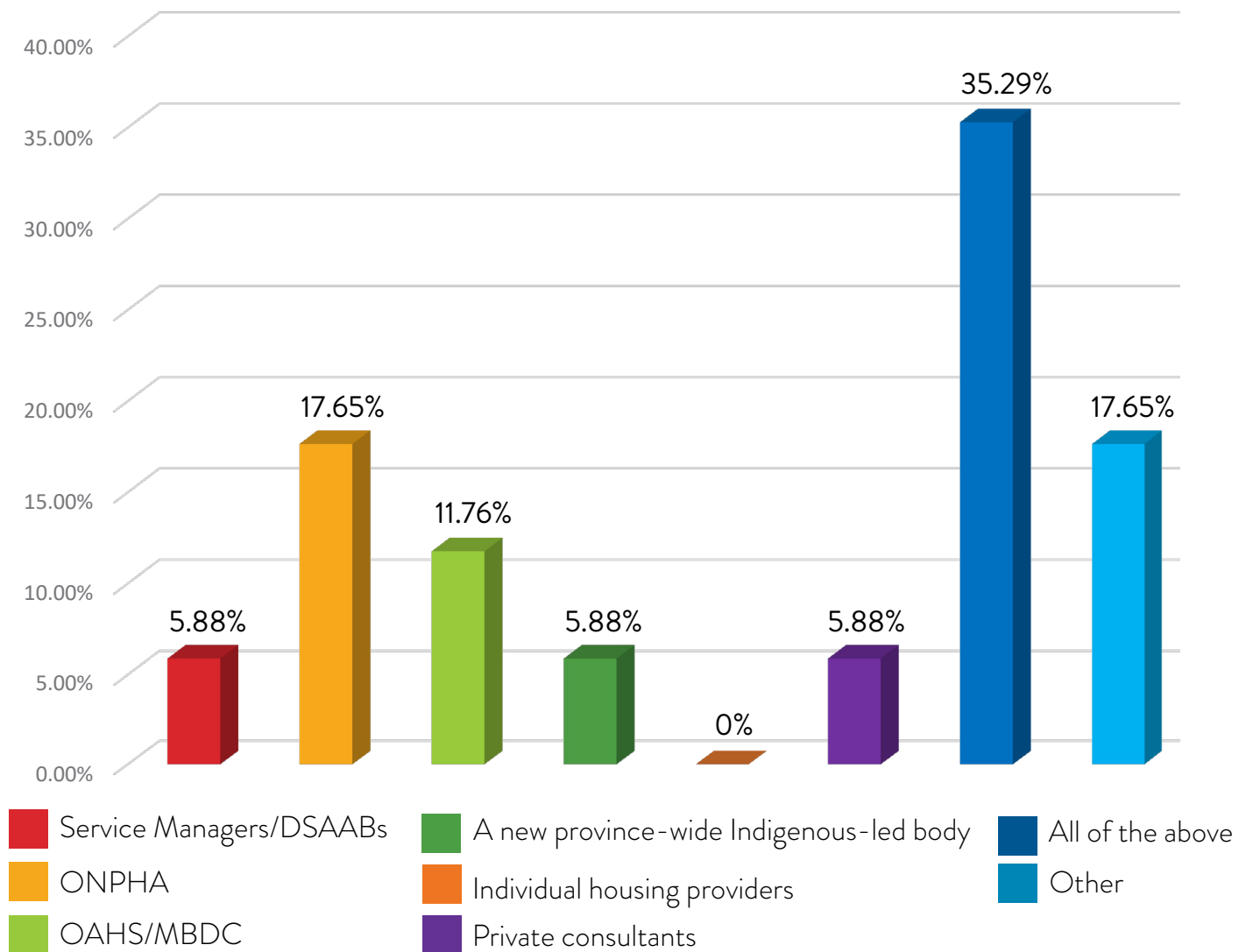
## Advocacy

The implementation of Indigenous housing solutions will require significant advocacy to garner support from federal, provincial, and municipal governments. Respondents were asked to rate the level of advocacy required on a scale of 1–10, with “1” indicating no advocacy requirement and “10” indicating the need for constant advocacy. The average response was 9.3, indicating that all respondents identified the need for significant advocacy to implement the *URIHPO*.

With respect to responsibility for advocacy for the implementation of Indigenous housing solutions, no respondents indicated that individual IHPs should be solely responsible. 35.3% of respondents reported that all parties involved in the supply and operation of Indigenous housing should be involved in advocacy (Figure 11).

**Figure 11. Responsibility for advocacy for the implementation of the *URIHPO***

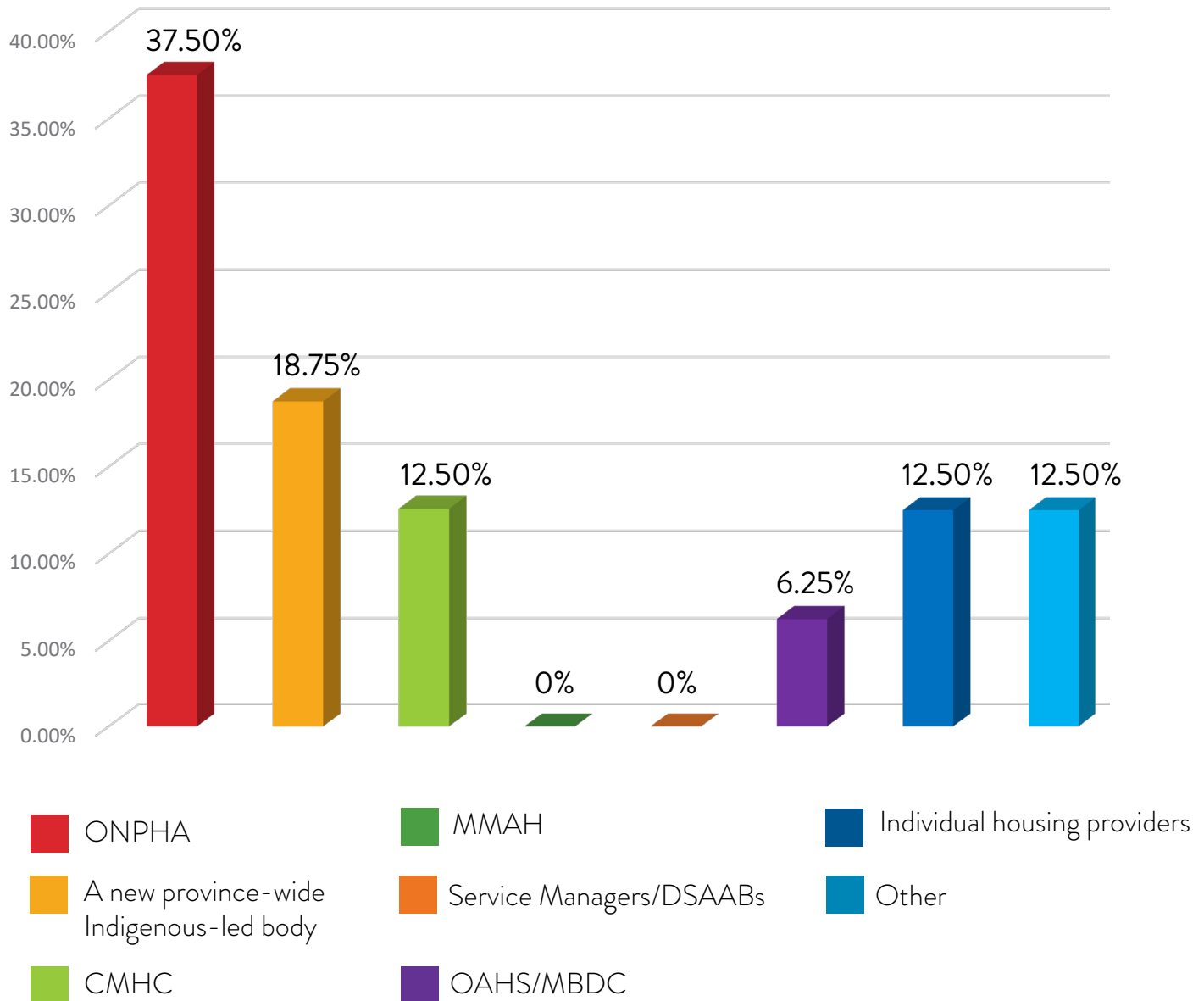
Note. DSSABs = District Social Services Administration Boards; OAHS = Ontario Aboriginal Housing Services; ONPHA = Ontario Non-Profit Housing Association; MBDC = Miziwe Biik Development Corporation.



Respondents were also asked who would be best placed to leverage data to conduct the necessary advocacy; 37.5% of respondents identified the Ontario Non-Profit Housing Association (ONPHA) (Figure 12).

**Figure 12. Leveraging data for advocacy purposes**

Note. CMHC = Canada Mortgage and Housing Corporation; DSSABs = District Social Services Administration Boards; MMAH = Ministry of Municipal and Aboriginal Housing; OAHS = Ontario Aboriginal Housing Services; ONPHA = Ontario Non-Profit Housing Association; MBDC = Miziwe Biik Development Corporation.



## *The Housing Continuum*

Respondents were asked about what could facilitate moving tenants along the housing continuum<sup>38</sup>. Participants provided a number of responses, of which no single intervention took priority (Note: respondents could select multiple responses to this question) (Figure 13). It should be noted that of the 16 items listed, none are directly related to housing, but rather to other social conditions, which, if improved and/or made available, could significantly impact living conditions: “poor housing conditions are associated with a wide range of health conditions, including respiratory infections, asthma, lead poisoning, injuries, and mental health”<sup>39</sup>.

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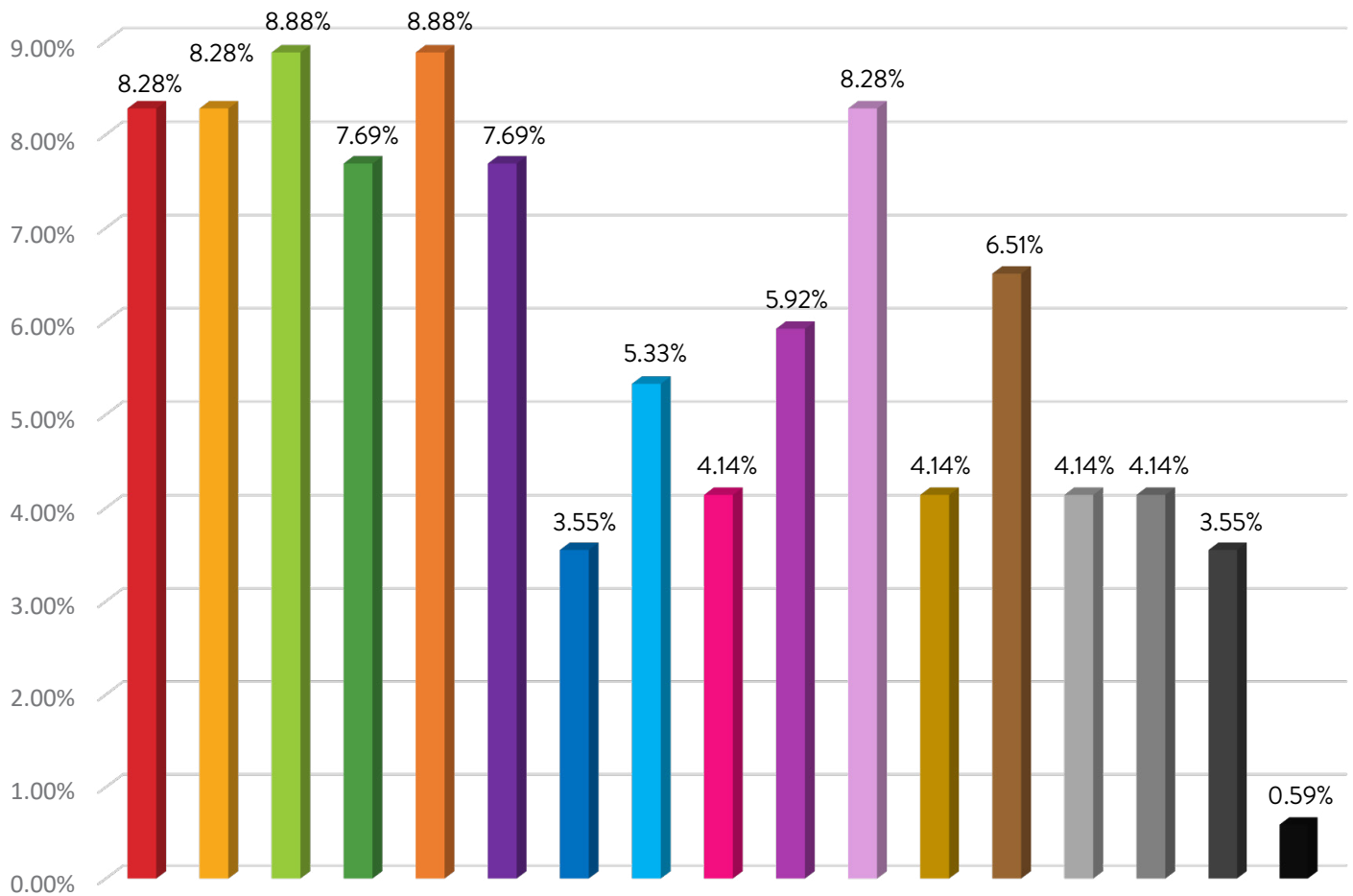
<sup>38</sup> It is important to note that some tenants are not interested in/able to move along the continuum (e.g., seniors)

<sup>39</sup> Krieger, J., & Higgins, D. L. (2002). Promoting public health research, policy, practice and education, housing and health: Time again for public health action. *American Public Health Association*, 92(5), 758–768.



**Figure 13. Interventions to facilitate moving tenants along the housing continuum**

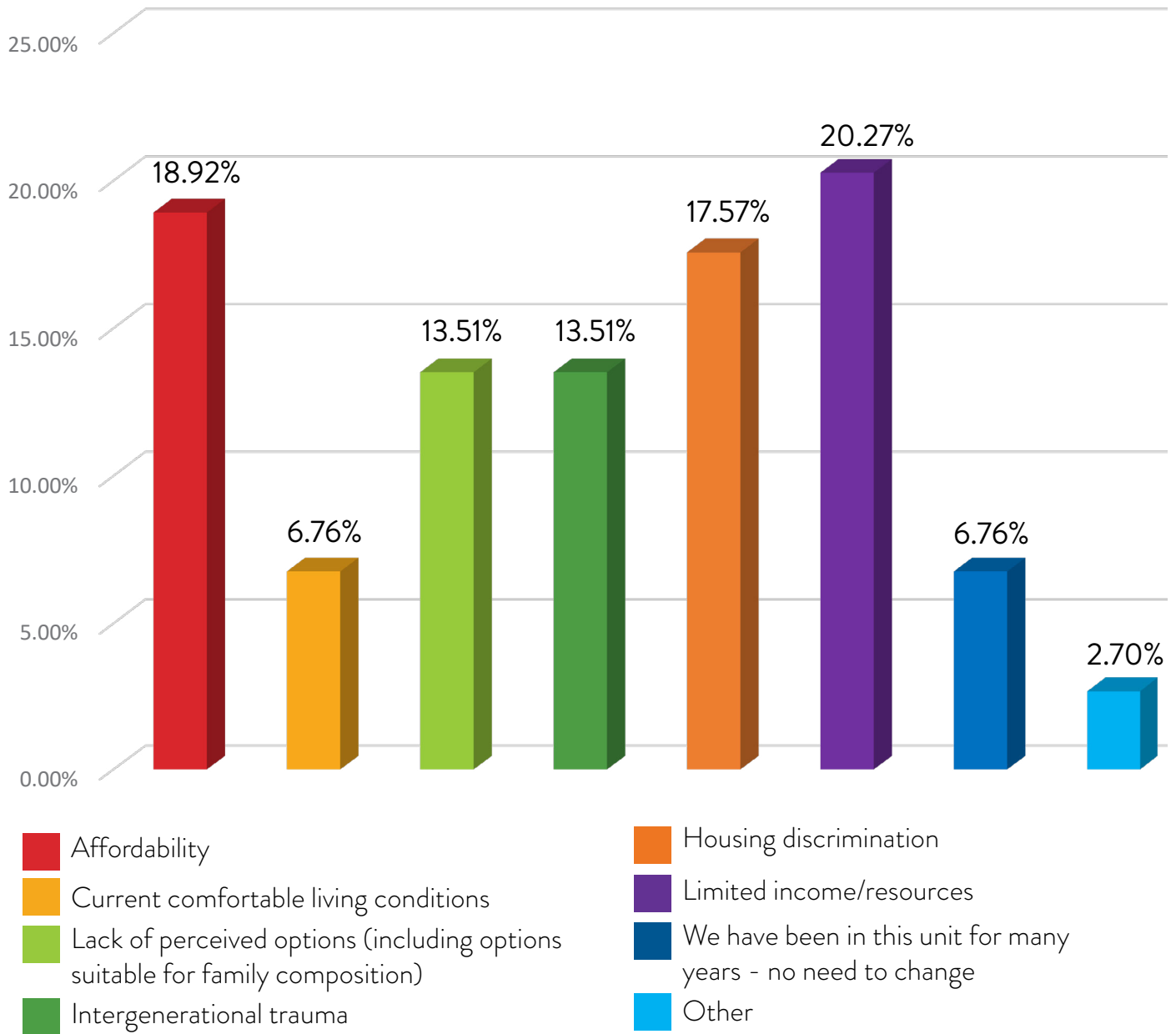
Note. 2SLGBTQ+ = Two Spirit, Lesbian, Gay, Bisexual, Transgender, Queer, Plus people



- Employment supports/access (E.g., employment coaching, networking opportunities, internships/apprenticeships, skill-building/training opportunities, job search/matching, etc)
- Education supports/access
- Financial supports/access (e.g., social assistance reform, living wage, financial literacy, etc.)
- Healthcare supports/access
- Mental health and addictions supports/access
- Cultural supports and services (including emotional support and social connections)
- 2SLGBTQ+ supports and services
- Access to healthy food
- Access to clothing, personal care items and services, etc.
- Accessibility supports and services
- Family support (e.g., childcare, senior care, etc.)
- Legal supports
- Access to accessible, affordable, timely, safe transportation
- Access to more space/bigger homes
- Access to different neighborhoods
- Ability of management to sell properties i.e. rent-to-own
- Other (please specify)

When asked about what was keeping tenants from moving along the housing continuum, almost 40% of respondents identified limited income (20.3%) and affordability issues (18.9%) (Note: respondents could select multiple responses to this question) (Figure 14).

**Figure 14. Impediments for tenants to move along the housing continuum**

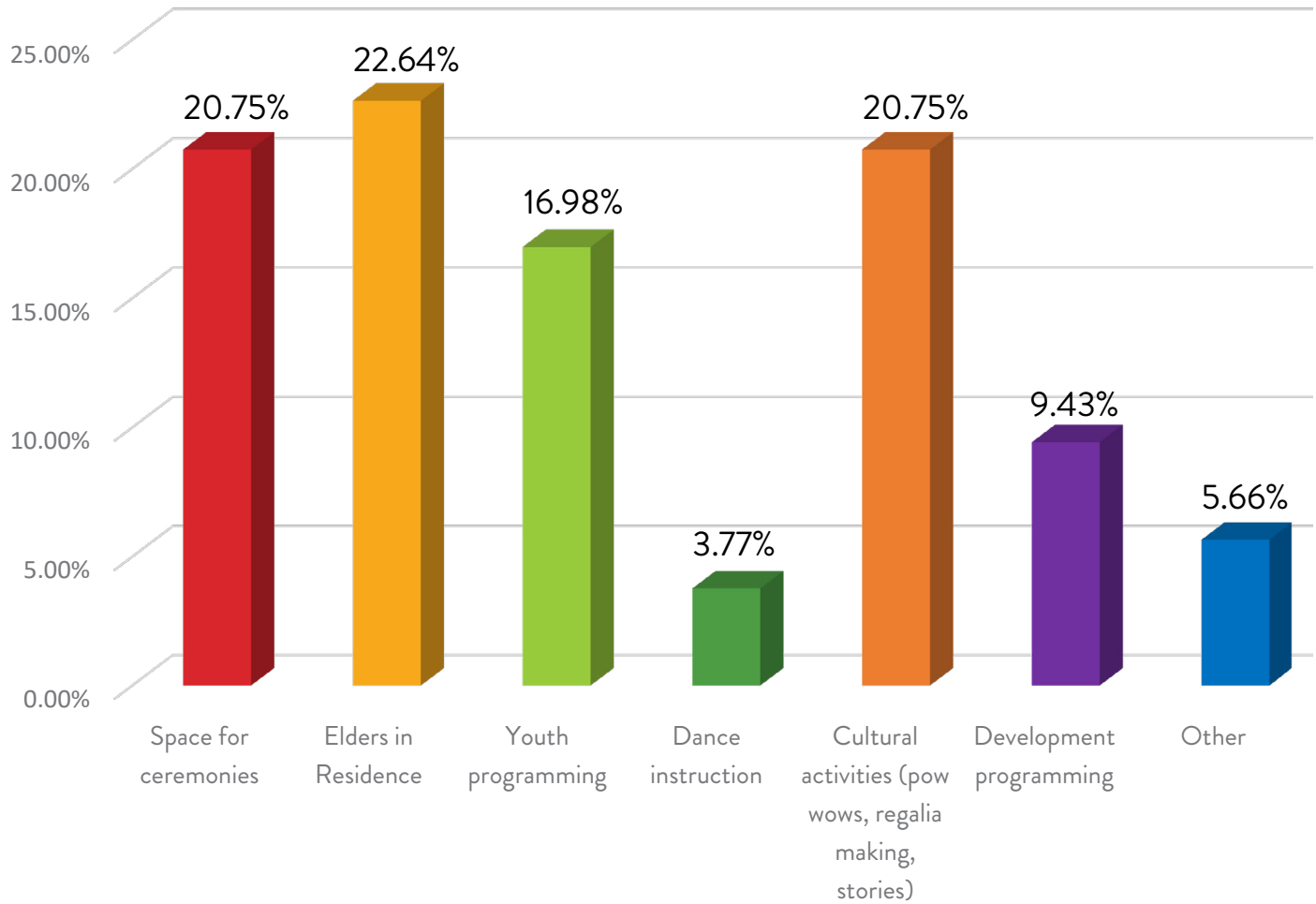


56.3% of respondents indicated that tenants should move along the housing continuum, while 31.3% were unsure. It should be noted that the survey was sent to IHP staff and did not involve tenants; as such, these responses may have varied if tenants also participated in the survey. Respondents were also asked if tenants could move along the housing continuum with access to adequate resources. 52.9% of respondents said yes and 47.8% said they were unsure, suggesting the many dimensions to addressing housing need (see Figure 13).

## Cultural Services

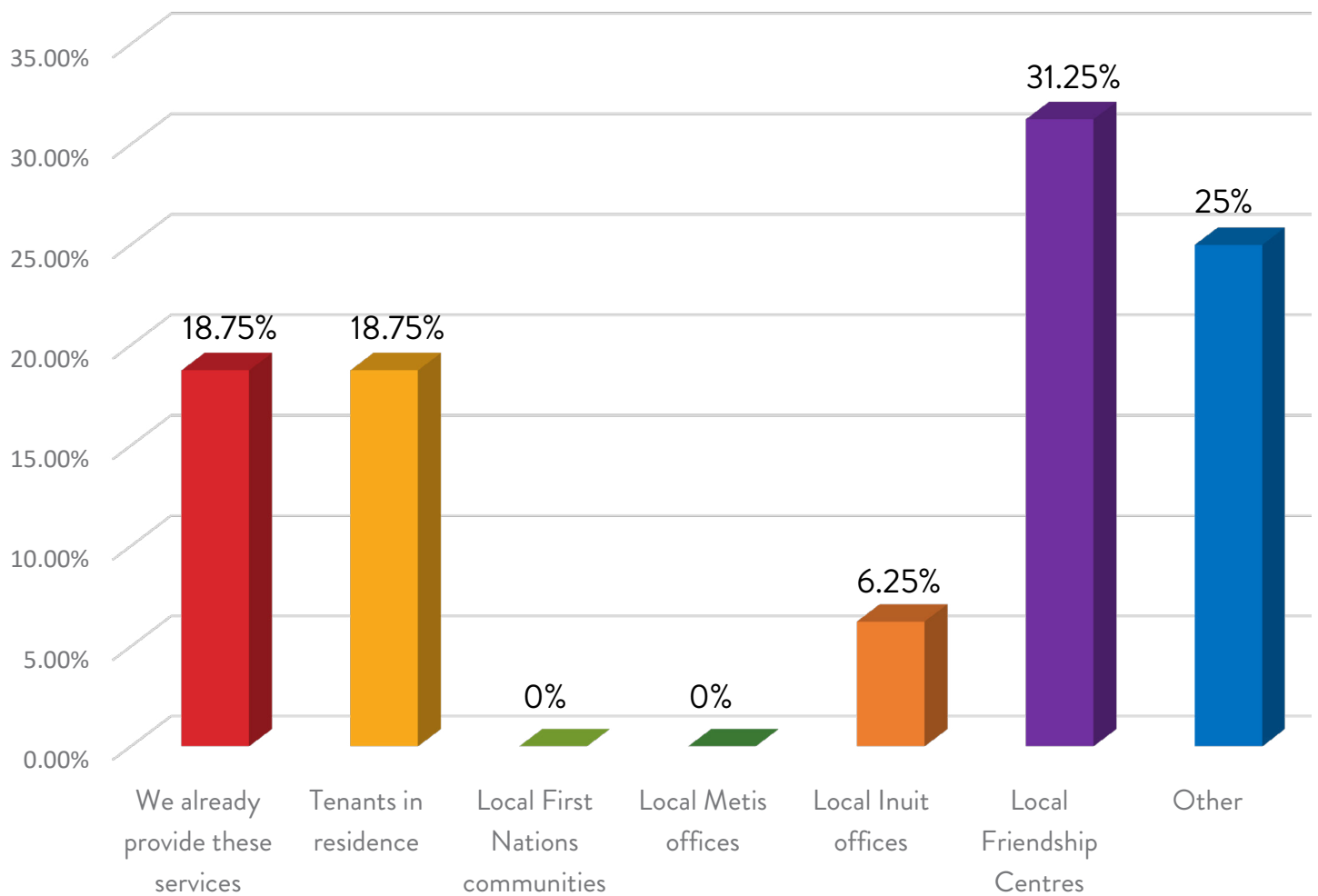
Respondents were asked what cultural services they would like to see offered in their communities to support tenant access to cultural services (Note: respondents could select multiple responses to this question) (Figure 15).

**Figure 15. Cultural services desired in communities**



As a follow up, respondents were asked to identify who would be best suited to provide the cultural services to their tenants (Figure 16). In addition to the list of organizations provided, the Ontario Native Women's Association was also identified as a potential cultural service provider. 18.8% of respondents indicated they already provide cultural services.

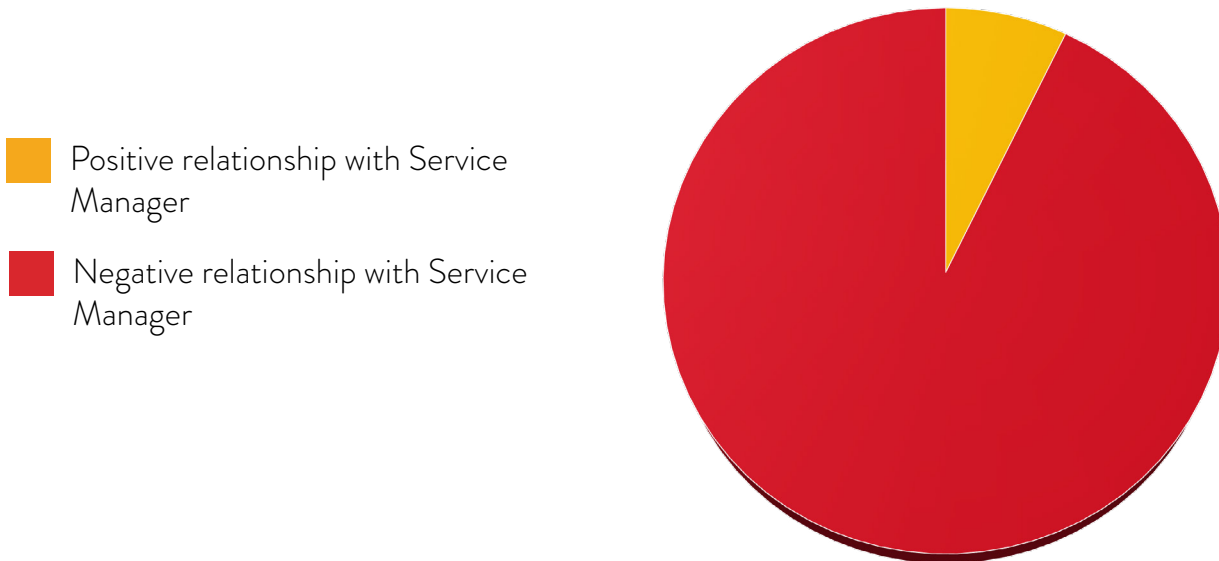
**Figure 16. Providing cultural services to tenants**



### **Relationships**

Maintaining positive working relationships with municipalities and other organizations is critical to advance Indigenous housing solutions. Figure 16 demonstrates that some IHPs themselves, as well as local Friendship Centres, provide some cultural services for tenants, according to the survey respondents. Respondents were also asked about their working relationships with their local Friendship Centre and/or other Indigenous community organizations, with 75% of respondents indicating they had those working relationships.

**Figure 17. Relationship with Service Manager**



### ***“For Indigenous, By Indigenous”***

Respondents were asked to rate the importance of Indigenous control, direction, and management over the implementation of Indigenous housing solutions on a scale from 1–10, with “10” being very important. The response averaged at 8.5.

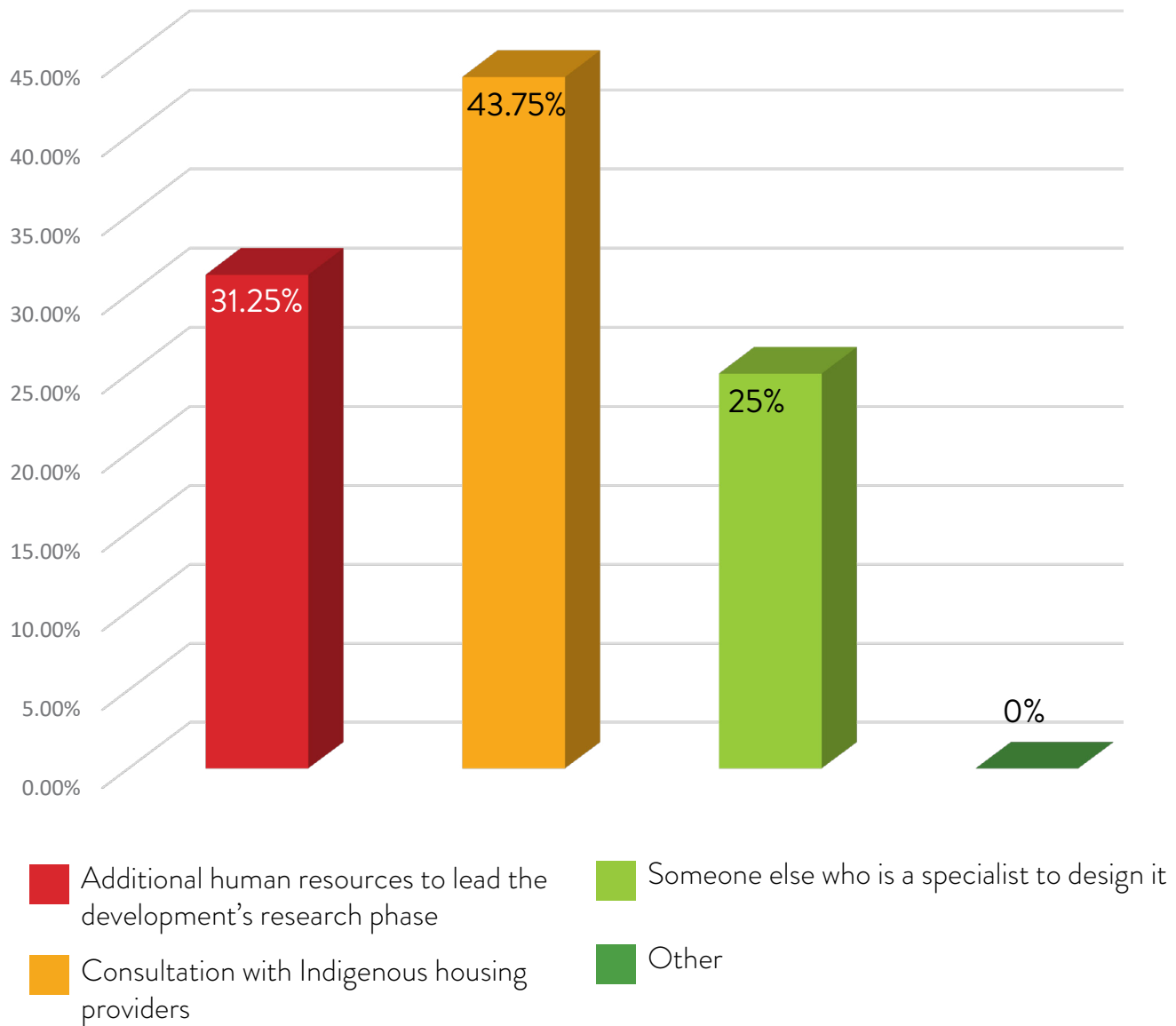
With respect to how to ensure Indigenous control over the implementation of Indigenous housing solutions, respondents were asked if they would support the development of a new province-wide, Indigenous-led entity/entities to undertake the implementation. 50% of respondents supported such an approach, 6.25% did not, and 43.75% identified it as a potential approach as long as it did not impact their operational funding. Access to sufficient operational funding remained a consistent theme throughout the open-ended survey responses.

### ***Database***

Data drives policy and funding decisions. Currently, the Indigenous community housing sector lacks a comprehensive, consistent, and cohesive community-supported database. While many IHPs undertake asset condition assessment reports for their individual portfolios, these reports and data are not easily accessible to represent the overall need, capacity, and state of repair across the sector.

Respondents were asked what would be required to build a potential province-wide Indigenous community housing database. 43.8% identified the need for consultation with IHPs (Figure 18).

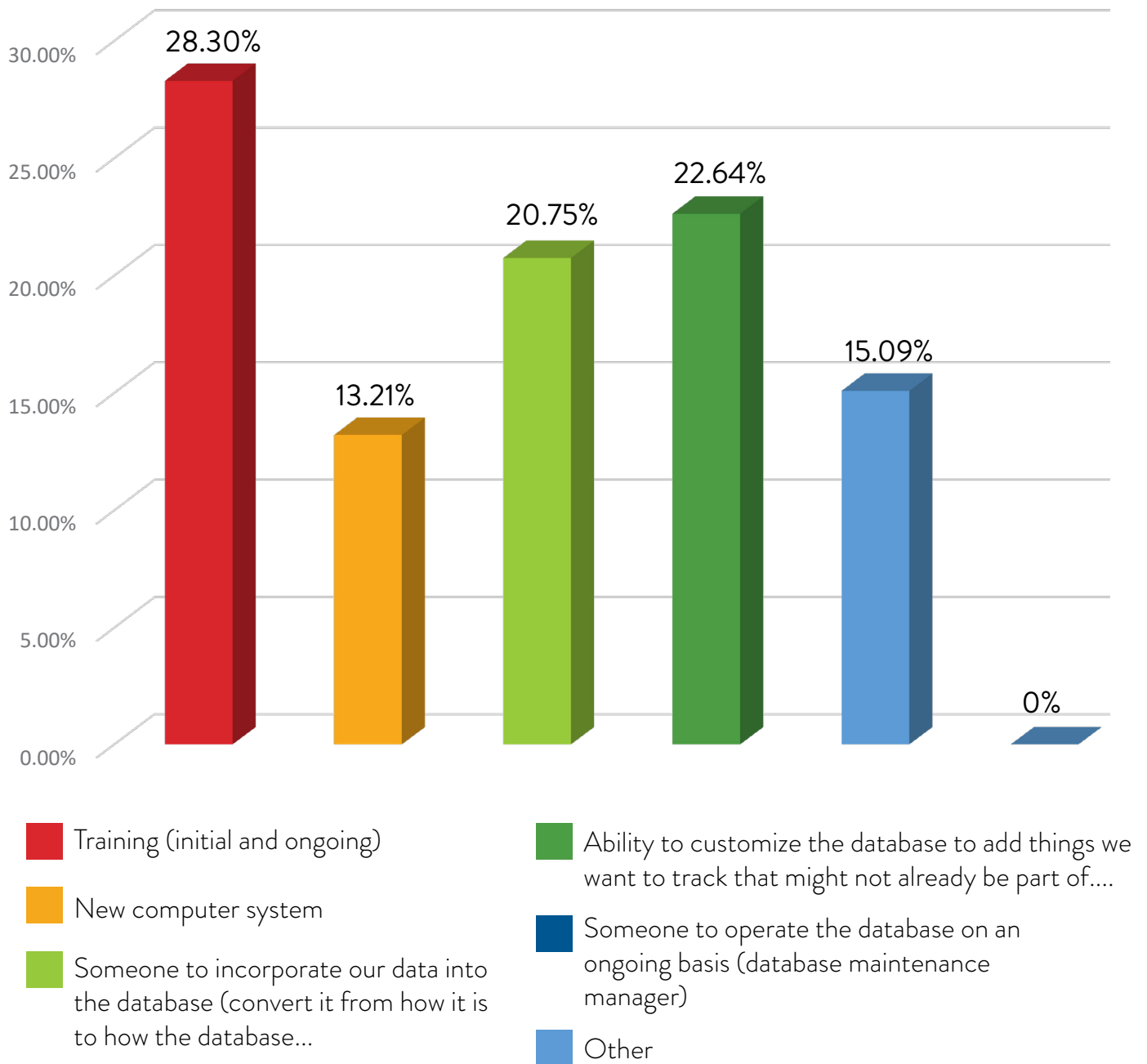
**Figure 18. Requirements to build a province-wide Indigenous community housing database**



56.3% of respondents identified that they would use such a database, with the same percentage indicating that they would be interested in supporting its development to meet their needs.

Respondents were also asked about the resources required to support use of such a database (Note: respondents could select multiple responses to this question) (Figure 19).

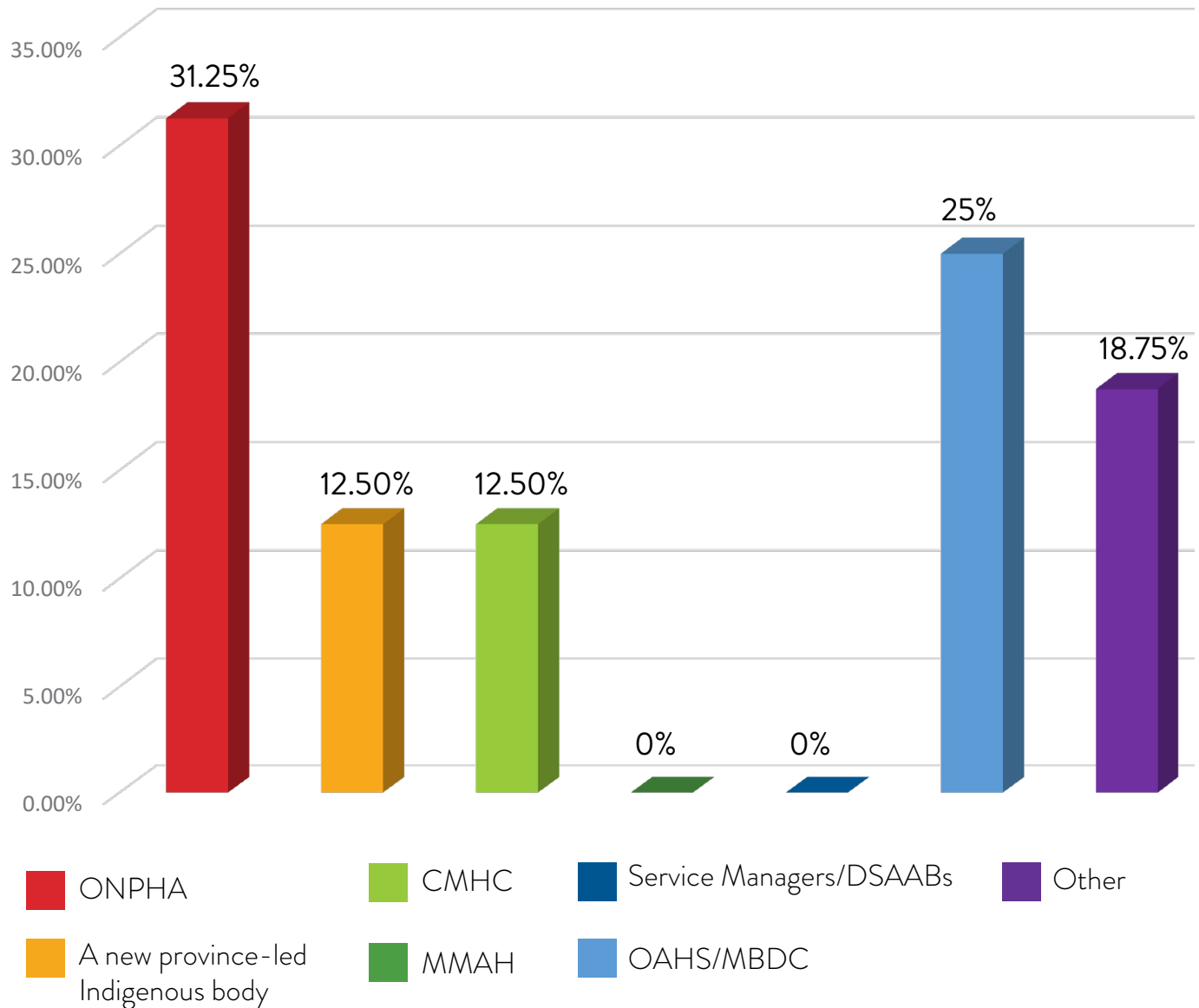
**Figure 19. Resources required to help use a province-wide Indigenous community housing database**



With respect to the development of such a database, respondents identified ONPHA (31.3%) and OAHS/MBDC (25%) as potential parties to lead that work (Figure 20). Throughout the survey, respondents identified OAHS and MBDC as key partners in the implementation of Indigenous housing solutions.

**Figure 20. Database development**

Note. CMHC = Canada Mortgage and Housing Corporation; DSSABs = District Social Services Administration Boards; MMAH = Ministry of Municipal and Aboriginal Housing; OAHS = Ontario Aboriginal Housing Services; ONPHA = Ontario Non-Profit Housing Association; MBDC = Miziwe Biik Development Corporation.

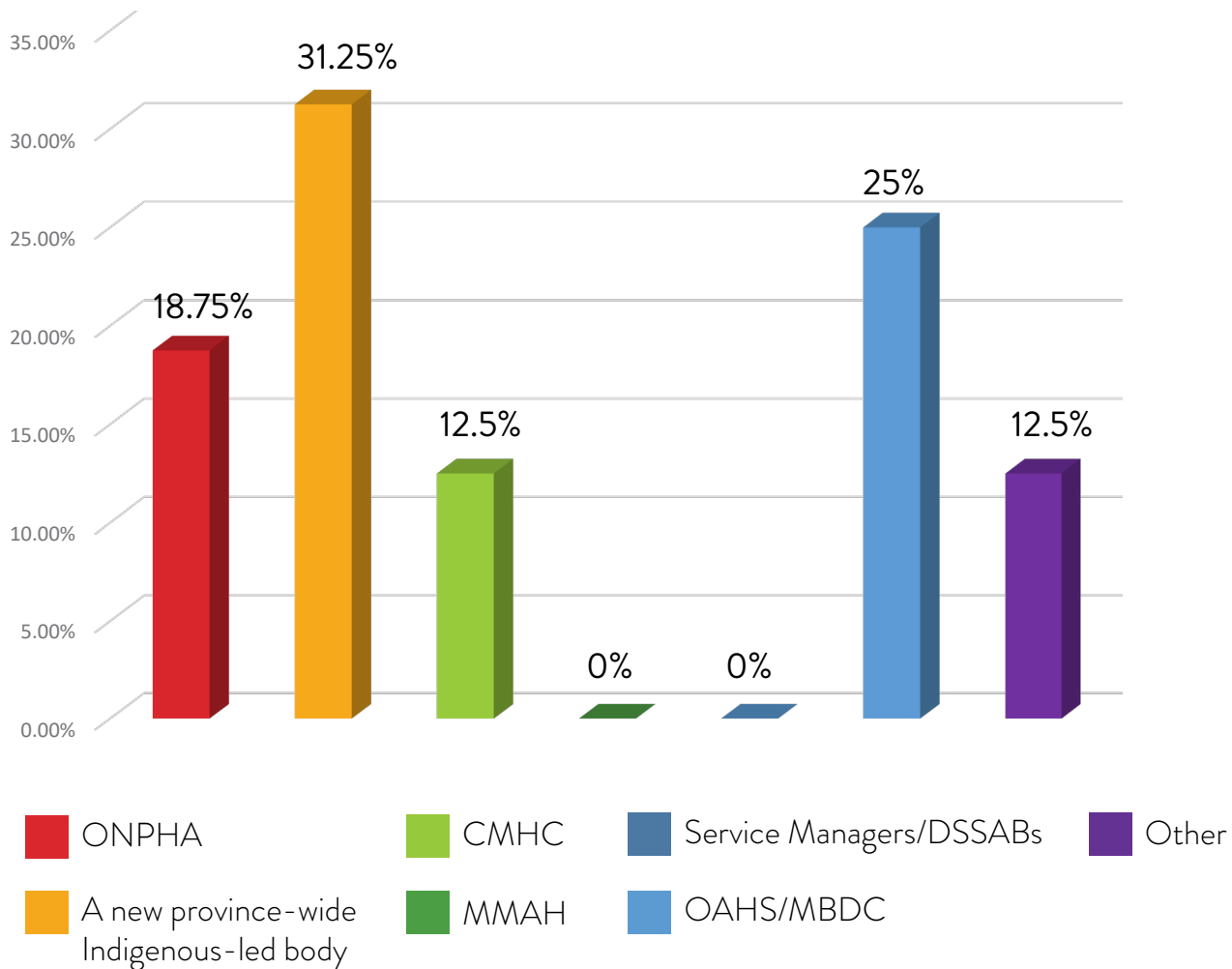


With respect to the management of a potential province-wide Indigenous community housing database, 25% of respondents identified OAHS/MBDC and 31.25% identified a new province-wide Indigenous-led body (Figure 21).



## Figure 21. Database management

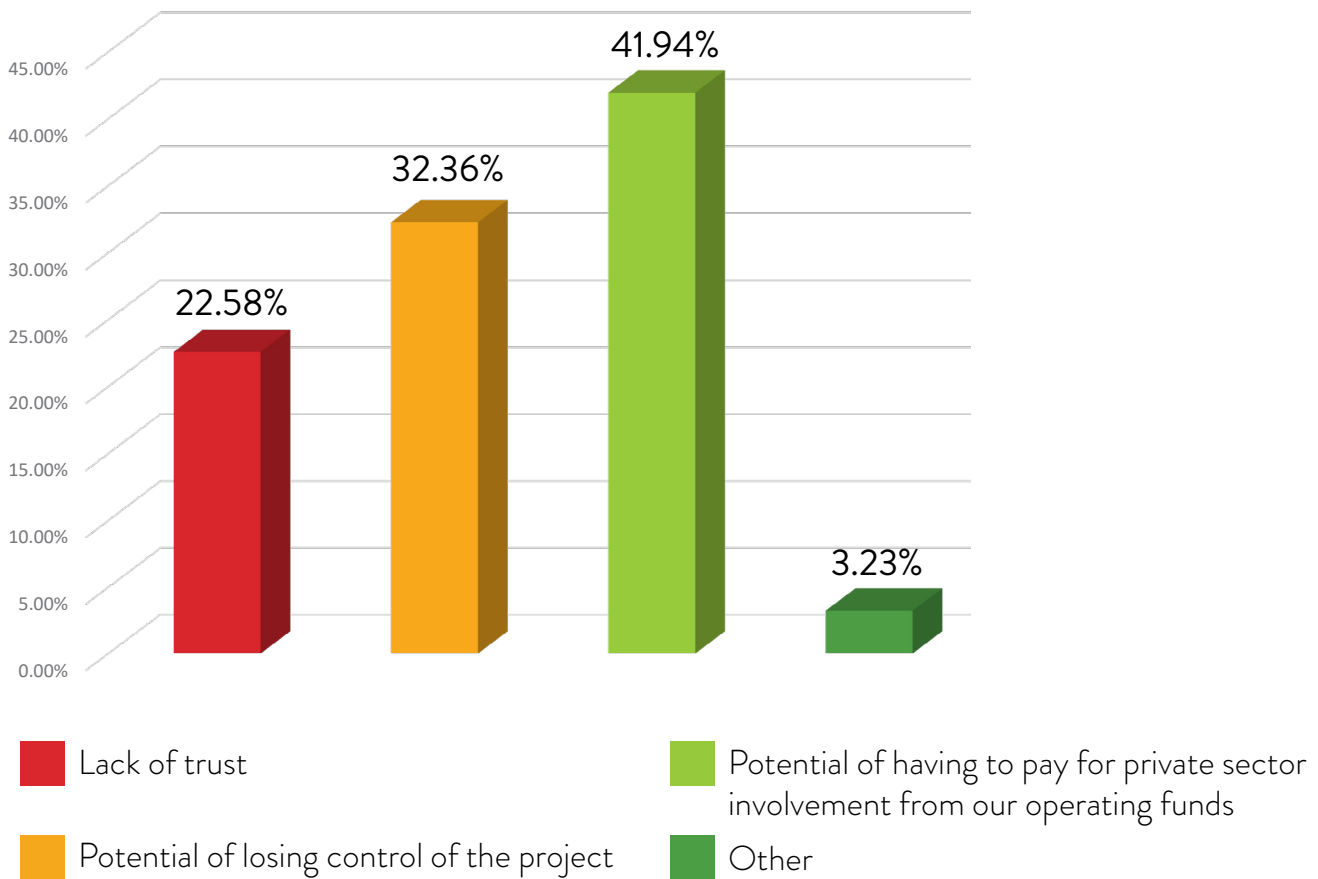
Note. CMHC = Canada Mortgage and Housing Corporation; DSSABs = District Social Services Administration Boards; MMAH = Ministry of Municipal and Aboriginal Housing; OAHS = Ontario Aboriginal Housing Services; ONPHA = Ontario Non-Profit Housing Association; MBDC = Miziwe Biik Development Corporation.



## Role of the Private Sector

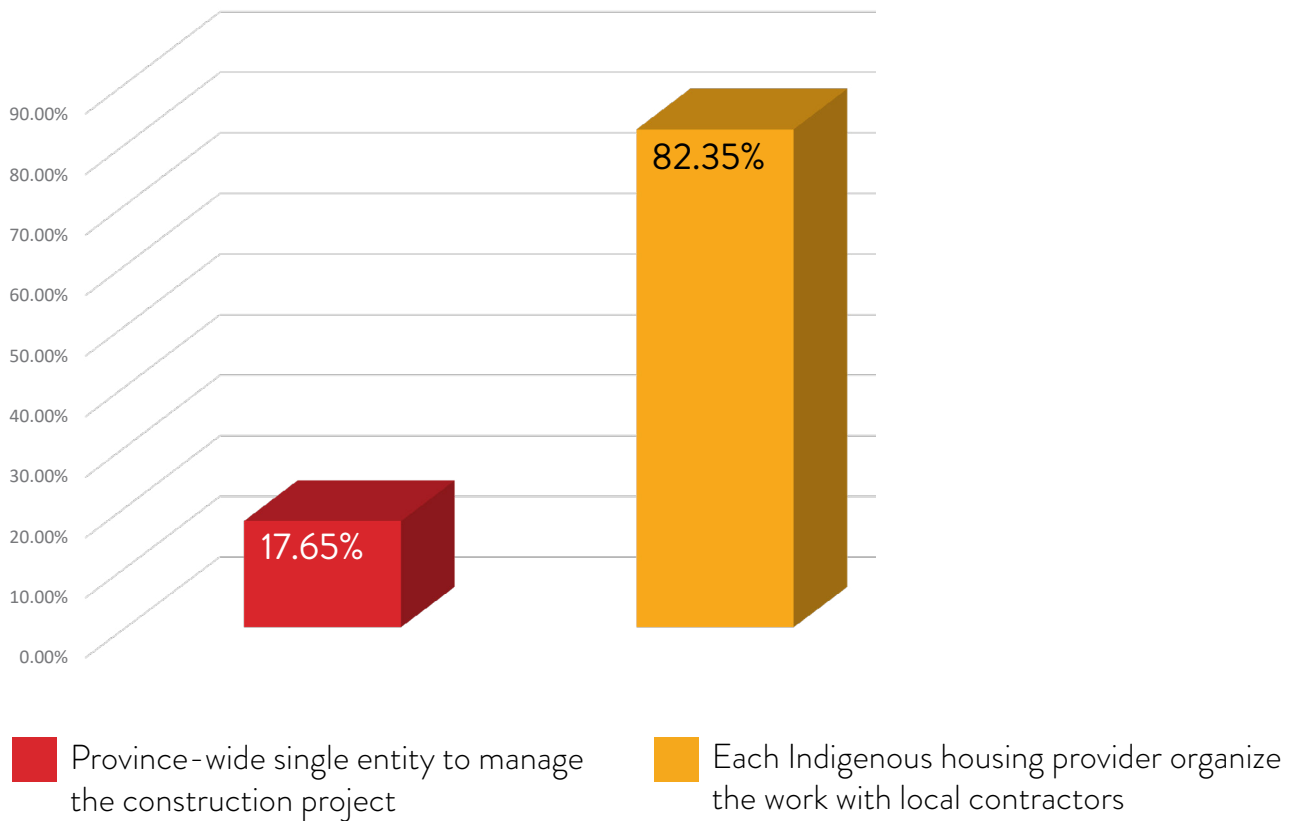
47.1% of respondents identified that they would work with the private sector to ensure that Indigenous housing needs are met, with 52.9% indicating that they might. Some hesitance and concerns around working with the private sector were expressed (Note: respondents could select multiple responses to this question) (Figure 22).

**Figure 22. Concerns around working with the private sector**



82.4% of respondents identified that IHPs should lead the work and management of capital projects in their respective areas (Figure 23).

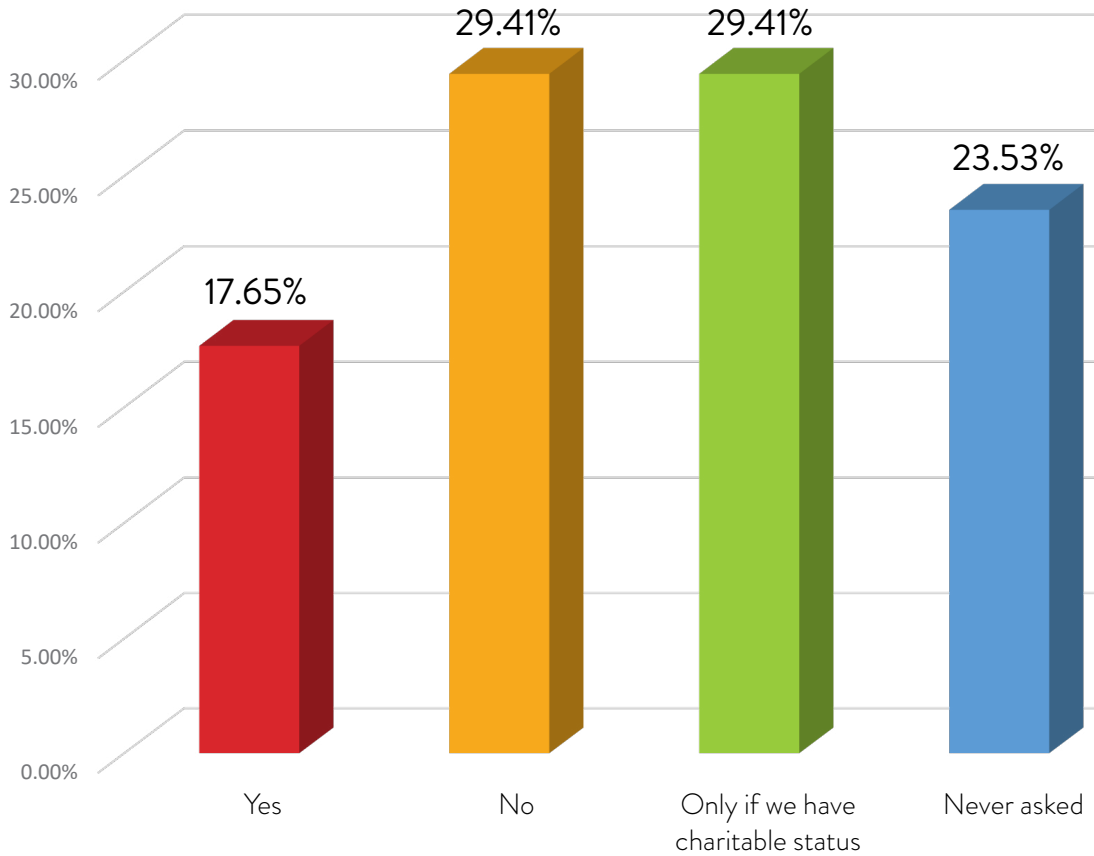
**Figure 23. Management of the construction project in each area served by Indigenous housing providers**



### **Available Land for Expansion**

47.1% of respondents did not know whether municipal land was available for purchase. 52.9% of respondents were unsure of the cost of land in their respective areas. 17.7% of respondents indicated that their municipality offered some level of tax relief, while 23.5% of respondents indicated that they had never asked about access to municipal tax breaks (Figure 24).

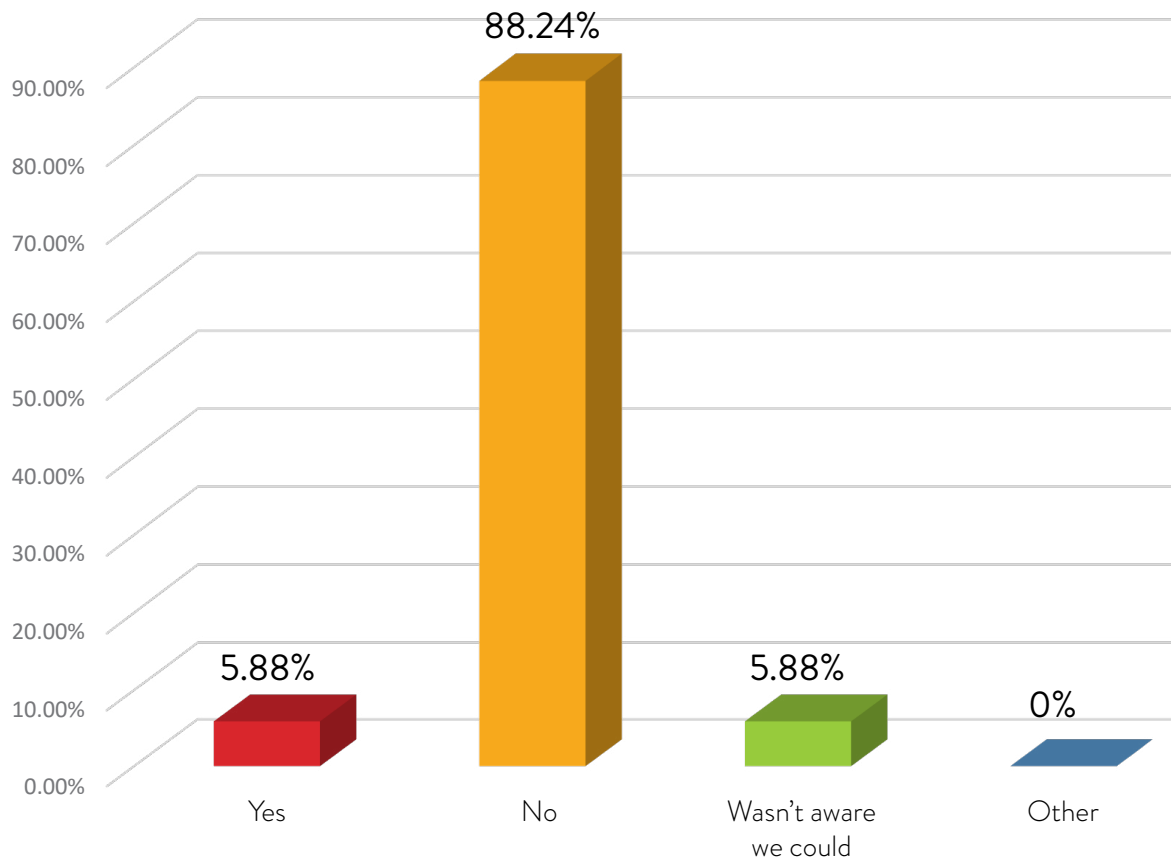
**Figure 24. Access to municipal tax relief**



While 29.4% of respondents reported that housing providers with charitable status received tax relief in their municipality, only four respondents indicated that they had charitable status.

Respondents were also asked if they had explored the purchase of properties for sale because of tax arrears, with 88.2% indicating that they had not (Figure 25).

**Figure 25. Exploration of property purchase due to tax arrears**



### ***Moving Forward***

Respondents were asked about the best approach to ensure their voices were heard and represented in the Urban and Rural Indigenous Housing Implementation Plan for Ontario. Respondents identified involvement in the ONPHA Urban and Rural Indigenous Housing Advisory Committee (URIHAC) (43.8%), regular updates from ONPHA and the URIHAC (18.75%), and ongoing engagement opportunities related to the development of the Implementation Plan, including regular updates (12.5%) and consultation sessions (6.3%).

# REGIONAL ENGAGEMENT SESSIONS

In addition to the survey, all Indigenous housing providers (IHP) were invited to participate in one of four targeted regional engagement sessions, held virtually in each of the four key regions identified above. A total of 19 representatives participated in the four sessions, with representation from across the province. As above, the engagement session results do not represent the full scope of perspectives from across the Indigenous community housing sector. However, concerted efforts were similarly made to engage all providers in the sessions.

Following an overview of the feedback gathered through the regional engagement sessions, the findings are presented in relation to each recommendation from the Urban and Rural Indigenous Housing Plan for Ontario (*URIHPO*).

## Overview

Similar to the survey results, the engagement session discussions validated the *URIHPO*, but recognized that it may underestimate the need (and required funding). In addition, engagement session participants agreed that the implementation of Indigenous housing solutions must be Indigenous-led. There was no clear consensus from participants on whether the *URIHPO* was achievable. Participants noted that building approximately 50 new units per IHP per year would be an ambitious and difficult target to achieve. Others identified the need to seek as much funding as possible to support the construction of the required units, while still others expressed concern over the funding ask being too high and leading to rejection.

Ultimately, participants agreed that political decisions would steer the implementation of Indigenous housing solutions. To this end, participants expressed immense disappointment over the current absence of dedicated funding toward urban, rural, and northern (URN) Indigenous housing through the National Housing Strategy, highlighting this as a critical area for ongoing advocacy. Recognizing the existing barriers to funding URN Indigenous housing through the National Housing Strategy, participants expressed concerns around securing the required support for the implementation of Indigenous housing solutions.

Participants highlighted the limited access to and availability of adequate, equitable funding for urban and rural Indigenous housing, both for new development and ongoing operating costs. Participants identified the need to address inconsistent relationships and challenges with Service Managers (in addition to provincial and federal levels of government), including ongoing funding contributions to meet fiduciary obligations to fund Indigenous housing services. Participants also shared the significant administrative burdens they currently face, recognizing that current

reporting and administration requirements are unsustainable (especially for smaller providers), and should be streamlined and simplified. Ultimately, participants expressed concerns around the lack of Indigenous control in the sector, and the need to prioritize a “For Indigenous, By Indigenous” (FIBI) approach to the implementation of Indigenous housing solutions.

The participants’ shared vision for the implementation of Indigenous housing solutions included streamlined application and reporting requirements, access to professional services (as required), responsive policy and funding to meet supply and demand, the maintenance of IHP autonomy and agency, and adequate funding to support both development and operations. In addition, there was strong consensus that all aspects of the Implementation Plan must be Indigenous-led and undertaken with a holistic approach (i.e., including justice, homelessness, and other community sector organizations).

## **Engagement Session Discussion**

### **Recommendation 1: 22,000 units in 10 years**

Participants expressed excitement about the prospect of building the required units in 10 years, but noted barriers and time constraints around modifying zoning by-laws, obtaining building permits, and purchasing land.

Participants stressed the importance of IHP independence and agency, as well as the fundamental need for access to funding to support start-up costs. Participants noted that existing funding available for Indigenous housing generally does not meet the true costs associated with building and providing housing services, such as pre-planning, planning, capital infrastructure, and operational costs. Participants highlighted the need for seed funding through grants, rather than loans, which could transfer into stable bridge financing to eventually support ongoing operational costs. Moreover, participants also identified that funding must be available for ongoing engagement with IHPs and their community members.

With respect to the distribution of funding, participants identified the need for funding to be disbursed according to need/demand, existing supply/capacity, cost/availability of land, development costs, and regional differences. Participants agreed that IHPs should own their lands and buildings, and expressed frustration around the need to buy back their traditional lands to do so. Many participants suggested that all available public land and repossessed properties should be prioritized for Indigenous housing.

## **Recommendation 2: Housing Continuum**

Participants emphasized the need for adequately funded options along the housing continuum, including homelessness services, transitional housing, supportive housing, and subsidized housing, to ensure availability in all communities. Participants also noted the need for more appropriate choice- and circumstance-based options to address housing for a range of needs, including housing for seniors and palliative/end of life care (which are typically not addressed along the housing continuum and are increasingly in demand). One participant noted that their seniors units did not meet accessibility standards (e.g., wider doorways, walk-in showers, etc.).

Participants identified “affordable housing” (i.e., non-subsidized affordable housing, usually 80% of average market rent rates) as simply not affordable for most of their community members in need, and as such, determined that it was less of a priority with respect to funding options along the housing continuum (though recognized the need for affordable housing options for households experiencing an increase in socio-economic status, to ensure access to deeply affordable housing for those in the greatest need). Home ownership was also identified as an important component of the housing continuum, along with rent-to-own and mortgage approval options; however respondents noted the significant affordability barriers (especially in larger urban centres) for their community members with respect to home ownership.

Participants also highlighted that the housing continuum is not linear, but is closer to a mosaic. As such, it should be choice- and circumstance-based, operating as a holistic system as opposed to the current siloed approach. Participants expressed the desire to provide options along the housing continuum, while also developing and strengthening strong working relationships with other community organizations to provide other necessary services to support tenant needs.

## **Recommendation 3: Cultural Continuum**

All of the participants recognized the cultural continuum as a fundamental component of Indigenous housing, but noted funding barriers, leading to the majority of cultural services being provided by other community organizations. Cultural supports can range from ceremony and connection to identity and culture, to life skills and how to successfully live away from one’s home territory.

Participants identified that much of the funding available for cultural services is currently restricted to specific ministries/departments that require accreditation (e.g., to provide social services, health services, etc.). As such, current funding arrangements necessitate competition between IHPs and other service organizations, with funding ultimately being directed away from housing. Many supports, including cultural services, are required for those in deepest need (i.e., people experiencing homelessness, hard-to-house, deep-core housing), though funding is often difficult to obtain.



In some cases, participants noted that they preferred partnerships with other Indigenous-serving organizations over providing all of the needed cultural services in-house. However, participants emphasized the need for IHPs to have the option (through access to adequate funding) to offer such services themselves or to partner with other organizations, rather than being forced into a position that may be undesirable and ultimately not meet their community's needs. Highlighting the value of IHPs to their communities, one participant noted, "The cultural continuum is who we are—it's about how we offer our services to the community."

#### **Recommendation 4: For Indigenous, By Indigenous**

Participants strongly expressed the need for Indigenous control and leadership throughout every aspect of the implementation of the *URIHPO*, including but not limited to reporting and application requirements, data collection, design and development, ownership and operations, and advocacy. Critically, participants identified that any new approach to the administration of Indigenous housing must be sufficiently funded, without negatively impacting current budgets. In addition, participants noted the need to acknowledge and accommodate regional differences and capacities, while ensuring Indigenous ownership, control, and agency.

Further engagement with IHPs is required to determine the new approach for delivering and funding Indigenous housing to ensure that the diverse priorities and perspectives of IHPs from across the sector are addressed and represented in the conceptual model. However, engagement session participants agreed that municipalities were not well suited to manage Indigenous housing.

Participants consistently supported the need for consensus-based decision-making throughout the implementation of Indigenous housing solutions, including with respect to funding allocations. Participants identified the need for strong, transparent reporting procedures that are accountable to a participatory membership.

#### **Recommendation 5: Database**

Current Indigenous housing data is incredibly fluid. Building assessments and reporting reports can vary from one assessment to another. While participants recognized data as essential for advocacy and policy development, they also identified that a database could quickly become irrelevant if it is not updated and maintained regularly, and that they do not currently have sufficient resources and capacity to do so.

Nevertheless, many participants supported the prospect of a dedicated Indigenous community housing database that could align and streamline their reporting requirements to produce helpful, centralized data on the current state of Indigenous housing in the province (e.g., needs/

gaps, availability and cost of land, unit/asset conditions, etc.). Considering the high demands of current reporting requirements, participants also suggested that a custom database could provide necessary reports directly to funders, saving significant capacity and resources for IHPs.

Participants emphasized that such a database must be sustainably funded, and must be owned and controlled by IHPs. While supportive of a database, participants continued to highlight the need to build the required housing units to meet growing community needs as a top priority over the development of a database.

## **Recommendation 6: Government Levers**

While different levels of government have tools to encourage the development of Indigenous community housing, participants raised concerns as to how these tools might be used. In response to concerns around private developers operating under different values and toward different goals, participants also recognized the importance of partnerships with the private sector for development. Importantly, they identified the need to ensure IHPs retain the majority of ownership over units developed in partnership with the private sector. As such, participants identified that government levers must advance Indigenous ownership and Indigenous community housing capacity.

However, some participants noted that the (Indigenous) housing crisis is not the sole responsibility of any single actor, and as such, partnerships and relationship-building must be a critical part of the solution. Participants also identified the modification of legislation to more easily and quickly facilitate Indigenous community housing development as a welcome government lever.

# ONPHA'S INDIGENOUS HOUSING PROVIDER GATHERING

ONPHA hosted a series of three virtual Indigenous Housing Provider Gatherings in 2020-2021 to bring together First Nations, Métis, and Inuit housing providers (IHP) from across the province to develop a “For Indigenous, By Indigenous” community-led Implementation Plan for ONPHA’s Urban and Rural Indigenous Housing Plan for Ontario (URIHPO).

At the second Gathering session in May 2021, participants had an opportunity to review the initial Implementation Plan materials, share feedback, and validate the findings through a series of interactive activities, including polls, breakout sessions, and plenary discussions. Following the Gathering, participants had an opportunity to share additional feedback toward the Implementation Plan and further engagement opportunities. 42 individual IHP and housing provider association representatives attended the Gathering, representing 25 unique organizations.

Recognizing the current administrative barriers, limited funding available/accessible, and inconsistencies in the delivery of Indigenous housing (including Service Manager relationships and requirements), the key areas for discussion at the Gathering focused on the approach to implementing Indigenous housing solutions to better meet the needs of Indigenous housing providers and their communities.

While the Gathering participants did not reach consensus on the preferred approach to administering and delivering funding for Indigenous housing in Ontario, they agreed on the need for transformational change to the Indigenous community housing system, prioritizing:

1. Dedicated funding from all levels of government to build and operate at least 22,000 subsidized Indigenous-owned and operated housing units in urban and rural regions across Ontario
2. All aspects of the Implementation Plan are Indigenous-led and controlled through a “For Indigenous, By Indigenous” (FIBI) approach
3. Ongoing engagement with IHPs to ensure flexibility for regional and capacity differences

In response to feedback shared during and following the Gathering for greater clarity, longer timelines for review and engagement, and increased outreach to providers across the province, ONPHA and Daniel J. Brant & Associates took a renewed approach to the development of the Implementation Plan in consultation with the ONPHA Urban and Rural Indigenous Housing Advisory Committee. This included prioritization and clear identification of timelines for engagement, consensus-building, and decision-making throughout each phase of the Implementation Plan. This process aimed to recognize and validate concerns from IHPs throughout the implementation development and planning processes, while seeking to provide clarity and focus on workable solutions that meet diverse community needs.



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