



ONTARIO NON-PROFIT  
HOUSING ASSOCIATION

**Ontario Non-Profit Housing Association (ONPHA)**

**Written Submission to Ministry of Finance for the 2023-2024 Pre- Budget  
Consultations**

**October 8, 2022**

### Summary List of ONPHA's Recommendations

Recommendation 1: The Government of Canada implement a comprehensive, urban, rural, and northern Indigenous-led housing strategy that includes dedicated investments to support the construction and delivery of housing for Indigenous peoples.

Recommendation 2: That the Government of Canada support the protection of, and increase in community housing supply that meets the needs of Canadians by enhancing the financial incentives and opportunities within the National Housing Strategy.

Recommendation 3: That the Government of Canada expand emergency income assistance to include rent-relief for unemployed and low-earning tenants and invest in a cross-ministerial approach to supportive housing to meet diverse housing needs and help end chronic homelessness.

October 8, 2022  
Government of Canada  
House of Commons Standing Committee on Finance

**Ontario Non-Profit Housing Association's (ONPHA) submission of priorities and recommendations in support of the 2023-2024 Federal Pre-Budget Consultations.**

Dear Members of the Standing Committee on Finance,

Thank you for the opportunity to provide recommendations to the pre-budget consultations in advance of the 2023 Federal Budget. We look forward to continuing to work with all levels of government, non-profit and private sector partners to kick-start economic recovery and ensure long term community sustainability.

ONPHA is the voice of non-profit housing in Ontario. Founded over 30 years ago, the Ontario Non-Profit Housing Association is a member-funded and directed association that represents over 730 non-profit landlords and local housing corporations throughout the province. The community housing sector provides safe, affordable, and stable housing for half a million low- and moderate-income Ontarians with built assets close to \$30 billion.

Through the pandemic, we have witnessed increased pressure across the economy. To upcycle the economy towards a stable and sustainable future, broader investments are needed. Investments in social infrastructure, including housing and direct community supports will release the economic pressure valve in the short-term, allow for construction and job creation to kick-start the economy in the mid-term and protect public investment across the healthcare, justice, and social systems for long-term savings.

We continue to witness the disproportionate impacts of the pandemic on marginalized and vulnerable communities, including Black, Indigenous, and other racialized communities, 2SLGBTQIA+ people, low/limited- income people, people experiencing homelessness, people with disabilities and seniors. As a sector, we understand the critical importance of long-term, sustainable housing that meets the diverse needs of the communities across Ontario. The health of our communities and their residents is directly impacted by the accessibility and quality of housing. The impacts we see today will continue to be compounded if we do not act quickly with innovative, long-term solutions to ensure everyone has a safe and affordable place to call home.

Therefore, we call on the government to continue to prioritize investments in community and non-profit housing in the 2023 Federal Budget through the recommendations introduced below. These

have been crafted based on our experience working directly within Ontario and Canada's community and non-profit housing sector. Please note that our organization is available to play a role in supporting the Government of Canada to navigate these recommendations, and any other work done to support affordable housing needs in Canada.

Sincerely,

A handwritten signature in black ink, appearing to read "Marlene Coffey". The signature is fluid and cursive, written on a light-colored background.

Marlene Coffey

Chief Executive Officer, ONPHA

## Recommendations

### **1. Implement a comprehensive, urban, rural, and northern Indigenous- led housing strategy that includes dedicated investments to support the construction and delivery of housing for Indigenous peoples.**

The pandemic has exacerbated the severe gaps in access to necessities for marginalized populations, particularly around healthcare, housing, and justice. Indigenous people are significantly over-represented in the carceral system, in homeless shelters, in emergency rooms and on police-calls. Adequate community housing addresses many of the socio-economic issues disproportionately impacting Indigenous people. 85% of Indigenous people in Ontario live off-reserve, of which 18% are in core housing need. In the current system, Indigenous housing providers face significant barriers to success, including limited access to funding and red tape.

ONPHA's Urban and Rural Indigenous Housing Implementation Plan for Ontario is a first-of-its-kind for the province. The Plan shows how Ontario can build at least 22,000 new subsidized off-reserve Indigenous owned and operated units. Building 22,000 units over 10 years can add 95,000 year-jobs into the market in the construction sector and other industries, while adding \$3.8 billion to the province's economy through construction multipliers and saving \$14.3 billion in system efficiencies.

Potential options for a new approach to administering and delivering funding for Indigenous housing could include, but are not limited to:

- Establishing a centralized, Indigenous-led entity to administer and deliver funding for Indigenous housing
- 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)
- 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.)

Indigenous housing leaders have already been working closely with government on solutions. They are the experts. We recommend that the government continue to work with them to co-design solutions and ensure appropriate, easy-to-access funding.

**2. Support the protection of, and increase in community housing supply that meets the needs of Canadians by enhancing the financial incentives and opportunities within the National Housing Strategy.**

To meet the needs of Ontario alone, 99,000 community or supportive housing units need to be constructed and another 260,000 require capital repair. We applaud the Government's recent commitment to invest over \$2 Billion to create 4,500 additional affordable housing units by extending the Rapid Housing Initiative for a third round and to create at least 10,800 housing units, including 6,000 affordable units, through the Affordable Housing Innovation Fund. We also continue to see the success of the projects funded through the National Housing Strategy. The Canada-Ontario Community Housing Initiative (COCHI) and Ontario Priorities Housing Initiative (OPHI) provide sustainability, growth, repair, and renewal along the housing continuum.

We call on government to maintain the programs and policies that enable the sector to sustain existing supply, and add new supply. Examples:

- Rapid Housing Initiative: continue with funding mechanisms like the Rapid Housing Initiative, which has been successful in creating new, permanent affordable housing for people and populations who are vulnerable. With over 2,800 units approved and opened to-date in Ontario, we call on government to maintain investments in programs that – in partnership with provincial governments, municipal government, and industry – enable providers to build more housing for the people who need it in their communities.
- Non-Profit Acquisition Fund: create a federal funding mechanism that will support the non-profit and supportive housing sector to acquire land and/or existing stock to increase their supply. Ontario alone has over 700 non-profit housing providers who have ambitions and interest in delivering more in their local communities, but due to economic conditions lack to buying power to match those ambitions.
- Tax Credits or Exemptions: introduce federal tax policies that incentivize the private sector to construct – not financialize – housing in Canada. This includes incentives and programs that encourage the private sector to sell these new properties to the community and non-profit housing sectors to ensure this new stock remains affordable in the long-term, and is managed and owned by entities who have the experience and interest in helping vulnerable people.
- Federal Community Housing Programs: maintain sufficient financial supports for federally-funded community housing providers. ONPHA was encouraged to see the introduction of the Federal Community Housing Initiative within the NHS to maintain stable supports through to 2028. We encourage the federal government to continue with this support either through

new operating agreements to replace expired ones, or continued financial supports through other assistance programs beyond the current timeline of 2028 so that providers are working with some certainty about their long-term financial futures and the operating conditions they must maintain.

**3. Introduce policies and programs that enable the community housing and supportive housing sectors to assist Canada’s most vulnerable people including unemployed/low income individuals, people experiencing homelessness, newcomers to Canada seeking to integrate, and senior Canadians aiming to age-in-place.**

Prior to the pandemic, nearly half of renters across Canada had less than one month’s worth of savings. In Ontario, 45% of tenant households spend 30% or more of their total income on shelter (the highest rate across the country).

We applaud the goal within the National Housing Strategy of ensuring every person in Canada has an affordable home that meets their needs by 2030. Community Housing (housing offered at a subsidized rate to tenants), Co-Op, and Supportive Housing (housing that provides specific social, medical or cultural supports to its tenants) are an important part of the solution. Our sector collectively serves many of Canada’s most vulnerable people, as our system provides a productive alternative to other tax-supported systems like healthcare and justice. With this in mind, we encourage the federal government to introduce mechanisms and policies that provide vulnerable people with a sense of security and stability in their access to affordable housing:

- Income and Rental Assistance: Expand rental assistance and enhance other income support programs to keep people housed and prevent pathways into homelessness. ONPHA was delighted to see the government introduce several accessible emergency income supports at the onset of the pandemic including financial supports including the Canada-Ontario Housing Benefit (COHB), and other complementary programs like the Community-Based Tenant Initiative. We encourage the continuation and expansion of these supports through partnership with provincial and municipal governments to enable broad access to those most in need.