

**Submission to the  
Standing Committee on General Government  
Bill 124 – *Rental Fairness Act, 2017***

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ONTARIO NON-PROFIT  
HOUSING ASSOCIATION

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**Members of the Standing Committee on General Government:**

Thank you for the opportunity to provide comments on the legislative framework for transitional housing that has been proposed within *Bill 124, An Act to amend the Residential Tenancies Act, 2006*.

The Ontario Non-Profit Housing Association (ONPHA) is a member funded and member-directed association that represents non-profit landlords and local housing corporations throughout the province. Our more than 700 member organizations manage over 163,000 units in 220 communities. Several of our members provide transitional housing programs currently, and many more serve populations that would benefit from such a model. ONPHA has worked extensively with our members on this issue in the past, and we recently participated in the provincial consultations on this topic.

We are pleased to see that the proposed amendments include an increase of the exemption period for transitional housing providers under the *Residential Tenancies Act* (the *RTA*). We are in full support of extending this exemption period from one year to four years, and believe that this will facilitate better results for individuals living in transitional housing.

Transitional housing is a unique form of non-profit housing that integrates support and time-limited accommodation. Transitional housing clients are, often, among the most marginalized members of the community and include formerly homeless individuals and individuals living with mental illness or addiction. The support the client receives helps them re-learn or build skills that they will need to move into permanent independent housing in the future. The *RTA* currently recognizes the value and unique nature of these programs, and provides that accommodations occupied for the purposes of receiving transitional housing services are exempt from that legislation if the period of occupancy is less than one year.

Transitional housing providers deliver housing and support services to a wide range of vulnerable clients. In many cases, clients are coping with multiple complex issues, such as their mental or physical health, or exiting difficult situations, such as domestic violence or homelessness. As a result, the trust and rapport necessary to build a strong and supportive relationship with transitional housing staff may take time to develop. However, the one year time limit that has been historically imposed by the *RTA* has pressured

program participants and organizations to begin their support relationship immediately. This short timeframe is often unrealistic given the complex histories of many individuals who access these programs.

The difficulties associated with meeting the current time restrictions mean that many transitional housing providers are forced to make difficult decisions that carry significant consequences. If the organization chooses to preserve its exemption under the *RTA* and the flexibility that it permits, then they may be forced to terminate services and housing for clients before they are ready. On the other hand, if the organization continues to provide housing and support beyond one year, the requirements of the *RTA* come into force and the client becomes a “tenant”. This changes the legal relationship between the participant and housing provider, and reduces the flexibility and creativity upon which the success of the programs depend. It also limits the organization’s ability to encourage the tenant to move into other housing in the community, meaning that the ability to “flow” new clients into the program is restricted because there is no longer space.

There is strong empirical evidence to support extending these programs, and thus *RTA* exemptions, for up to four years. The efficacy of this approach is nowhere better exemplified than through two programs delivered through Toronto’s WoodGreen Community Services. The Homeward Bound Program provides four years of wrap-around support for single mothers and their children. This program has not only proven beneficial for participants, but a 2013 analysis found that it also yields substantial economic benefits with every \$1 invested resulting in a \$4 return to society. This same analysis determined that the Homeward Bound model also contributes to direct cost reductions for the Ministry of Community and Social Services with a significant number of participants ceasing to receive Ontario Works benefits permanently. In fact, WoodGreen has calculated that the province will save \$13,572 annually for every family that becomes economically self-sufficient by participating in this long-term program.<sup>1</sup> The success of this model has resulted in it being replicated throughout the province. In 2014, an Ontario Trillium Grant was dedicated to creating similar programs in Peterborough and Leeds Grenville, and to creating an Indigenous specific model of the program in partnership with the Ontario Federation of Friendship Centres.<sup>2</sup>

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<sup>1</sup> Information retrieved from: <http://www.woodgreen.com/WoodGreenResponse.aspx>

<sup>2</sup> Information retrieved from: <http://www.otf.ca/woodgreen-community-services-lead-organization-collaborative>

WoodGreen's First Steps to Home Program, which is designed to help seniors transition out of homelessness by combining housing with wrap-around supports, is also delivered over a four year time period. A 2013 evaluation of this program included interviews with participants about the impact of this model. All of the 11 participants interviewed agreed that they needed more than one year to prepare to move into permanent housing, and the external research team ultimately concluded that participants would have been incapable of managing independently had they been required to leave the program at that time.<sup>3</sup>

ONPHA and its members appreciate that there are valid concerns associated with extending exemptions under the *RTA*, but we believe that these are mitigated through two key factors. First, transitional housing providers have organizational missions and mandates that revolve around supporting vulnerable individuals in maintaining housing stability. Increasing the period of time that these rehabilitative or therapeutic programs can operate and remain exempt from the *RTA* will not result in the violations of rights nor will it lead to precarious housing situations. On the contrary, extended timeframes would give dedicated transitional housing providers the time and flexibility to cultivate strong, supportive relationships with the individuals they serve, and would also strengthen their ability to help individuals to successfully transition to appropriate, affordable housing in the community.

Second, the proposed amendments set out requirements for written occupancy agreements between transitional housing program providers and participants to ensure strong participant protections. These written agreements would be required to include information about a process for third party dispute resolution, and a policy for securing alternate living accommodations for participants whose occupancies have been terminated, among other things.

Thank you for taking these factors into account when considering this important piece of legislation. ONPHA would be happy to provide more information about the value of longer-term transitional housing programs upon request.

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<sup>3</sup> Information about this 2013 evaluation was shared by WoodGreen program staff