



ONTARIO NON-PROFIT  
HOUSING ASSOCIATION

Tonia Grannum, Clerk of the Standing Committee on Social Policy  
99 Wellesley Street West  
Room 1405, Whitney Block  
Toronto, ON M7A 1A2

June 25, 2020

**Subject: Submission to the Standing Committee on Social Policy on Bill 184,  
*Protecting Tenants and Strengthening Community Housing Act, 2020***

Dear Members of the Standing Committee on Social Policy,

Thank you for the opportunity to provide comments and recommendations related to Bill 184,  
*Protecting Tenants and Strengthening Community Housing Act, 2020*.

Founded over 30 years ago, the Ontario Non-Profit Housing Association (ONPHA) 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 assets close to \$30 billion<sup>1</sup>.

As the voice of the community housing sector, we understand the importance of quickly moving forward with Bill 184. We commend the government on bringing forward enabling legislation that will help transform and modernize Ontario's housing sector. ONPHA and our members have greatly appreciated the opportunity to be involved in its development and support its intent.

While the legislation provides a strong framework to work toward sustainability in the community housing sector, we understand the majority of the changes impacting the sector will come through regulations. We applaud the consultation and engagement the government has undertaken to develop Bill 184. To ensure the forthcoming regulations meet and support the diverse needs in our communities, we strongly recommend your government continue to engage closely with ONPHA and the community housing sector in their development and implementation.

As we have witnessed the disproportionate impacts of COVID-19 on marginalized communities, including Black, Indigenous and People of Colour (BIPOC) communities, 2SLGBTQQIA+ people, low/limited-income people, people experiencing homelessness, people with disabilities and seniors, we understand the critical importance of long-term, sustainable housing across the continuum to support these communities. 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 approaches that support tenants and strengthen community housing for the long-term.



As such, we strongly recommend that forthcoming regulations related to the *Housing Services Act, 2011* (HSA):

1. Offer flexible, responsive options for housing providers at the end of operating agreements and mortgages, with opportunities to develop alternative funding models and ensure ongoing, sustainable support
2. Commit to ongoing stabilization funding for the community housing sector and municipalities to address the current crisis and ensure long-term sustainability and growth
3. Maintain current service levels for rent-geared-to-income (RGI) units, and create opportunities for expansion
4. Ensure priority of assistance is administered equitably to meet diverse housing needs across the province
5. Ensure service levels for accessible units reflect demonstrated need in communities and prioritize provincial engagement with the Canada Mortgage and Housing Corporation (CMHC) to provide flexibility around funding requirements for community housing providers related to accessibility
6. Ensure the access system is comprehensive, standardized and accessible to identify the needs and gaps across the housing system

With respect to the *Residential Tenancies Act, 2006* (RTA), we strongly recommend that forthcoming changes consider the current context of COVID-19 and prioritize policies that keep people housed and reduce homelessness levels in Ontario:

1. Target rent relief supports for unemployed and low-earning tenants, prioritizing high-risk, marginalized communities
2. Gradually ease residential eviction moratoriums in consultation with the housing, homelessness, health and related sectors, with considerations for the possibility of a second and third wave of COVID-19
3. Reintroduce rent control measures to maintain current rent rates and control vacancy levels by eliminating rent increases in newer units and restricting rent increases between tenancies
4. Address shortages at the Landlord and Tenant Board (LTB) to accommodate the proposed increases to LTB responsibilities and workloads, including training for new adjudicators with a focus on community housing contexts and challenges
5. Ensure changes to LTB dispute resolution processes recognize and actively work to mitigate power imbalances between landlords and tenants to ensure equitable outcomes

With respect to the *Building Code Act, 1992*, we strongly recommend that forthcoming regulations support:



1. Standardized application processes related to new construction and renewal across jurisdictions to reduce workloads and streamline approvals
2. Prioritized and accelerated approval processes for housing projects in the community housing sector to facilitate growth

With respect to the *Ontario Mortgage and Housing Corporation Repeal Act, 2020*, we strongly recommend that forthcoming regulations:

1. Ensure any excess revenues held by the Ontario Mortgage and Housing Corporation (OMHC) are reinvested into the community housing sector
2. Provide clarity on the party responsible for OMHC's outstanding environmental remediation liabilities
3. Ensure municipalities receive notice and can provide consent in the event that OMHC properties are transferred under their authority

ONPHA and our members are eager to work with the government in developing regulations that ensure an equitable, sustainable housing system for all Ontarians. The following pages contain details of our recommendations related to Bill 184.

### Detailed recommendations related to proposed changes to the *Housing Services Act, 2011 (HSA)*

Before the COVID-19 crisis, 46% of all renter households in Ontario were living in core housing need<sup>ii</sup> and more than 185,000 households were on waiting lists for subsidized housing<sup>iii</sup>. We expect these numbers to increase substantially as a result of COVID-19, which has severely reduced employment and income at unprecedented levels, especially for high-risk and marginalized communities, with significant implications for access to supports, food and other necessities. In Ontario alone, over one million jobs have been lost since the beginning of the pandemic<sup>iv</sup>, many of those precarious, low-wage, under-supported and undervalued.

Therefore we strongly recommend that the Ontario government:

- 1. Offer flexible, responsive options for housing providers at the end of operating agreements and mortgages, with opportunities to develop alternative funding models and ensure ongoing, sustainable support**

Challenges and uncertainties related to end of operating agreements and mortgages are a top priority for ONPHA and the community housing sector, with 55% of our membership affected by the end of provincial mortgages in the next ten years. If no action is taken, we project that 60,000 subsidized units could be at eventual risk of loss or falling into serious disrepair<sup>v</sup>. Without certainty



around ongoing funding models, providers reaching the end of mortgages cannot effectively and strategically plan for the future, severely compromising housing affordability across the province.

This year, ONPHA will be launching a series of workshops designed to engage community housing providers, Service Managers, provincial partners and other relevant stakeholders in planning for the expiration of mortgages and operating agreements, including the development of alternative funding models. To support the implementation of this work, we strongly recommend that forthcoming regulations offer flexible, responsive options for housing providers at the end of operating agreements and mortgages, reflecting sector-generated solutions that ensure ongoing, sustainable support for providers.

## **2. Commit to ongoing stabilization funding for the community housing sector and municipalities to address the current crisis and ensure long-term sustainability and growth**

Beyond the framework that Bill 184 provides to modernize Ontario's housing system, the COVID-19 pandemic has magnified the need for immediate and ongoing investment that will strengthen the community housing sector for the long-term. Cumulative rental arrears, in addition to increased costs related to unit vacancies, personal protective equipment (PPE), increased staffing, cleaning and security and backlogs of maintenance and repair work will continue destabilizing the community housing sector beyond the immediate crisis. As a result, many providers are beginning to redirect funding from capital reserves to support immediate operational challenges, severely threatening the sustainability of the sector for the long-term. At the same time, municipalities are facing unprecedented costs and tenants are facing uncertainty as income supports near their expiration and employment opportunities remain scarce.

Investment in housing has never been more necessary. Following a joint letter from ONPHA, the Cooperative Housing Federation of Canada (CHF) and the Federation of Rental-Housing Providers of Ontario (FRPO) on economic recovery planning<sup>vi</sup>, we call on the government to accompany Bill 184 with ongoing stabilization funding for the community housing sector and municipalities to address the current crisis and ensure long-term sustainability and growth.

## **3. Maintain current service levels for rent-geared-to-income (RGI) units, and create opportunities for expansion**

ONPHA has heard concerns directly from our members and across the sector around the potential loss of community housing stock and RGI units, which will only serve to worsen the growing affordable housing crisis in Ontario. To mitigate these potential impacts, we strongly recommend that forthcoming regulations clearly commit to maintaining the current number of RGI units in the community housing system, in addition to creating opportunities to expand RGI service levels across



the Province. Not only will this help to facilitate the sector's growth, but it will also serve to expedite waiting list timelines and meet the growing housing needs of Ontarians as a result of COVID-19.

**4. Ensure priority of assistance is administered equitably to meet diverse housing needs across the province**

ONPHA and our members were pleased to see the launch of the Canada-Ontario Housing Benefit (COHB) in April 2020 to support vulnerable individuals and households in need. In particular, we are extremely supportive of the populations identified as first priority for COHB support, including survivors of domestic violence and human trafficking, persons experiencing or at-risk of homelessness, Indigenous persons, seniors and people with disabilities. In addition, we support the alignment of COHB support with the Province's Portable Housing Benefit Framework, which specifies that social assistance recipients will have a separate benefit calculation to avoid a reduction in social assistance entitlements.

In addition to the priority populations identified in the COHB, COVID-19 has disproportionately impacted Black and other racialized communities, 2SLGBTQQIA+ people and low/limited-income people, predominantly as a result of barriers to accessing healthcare and mental health services and higher rates of homelessness, poverty and social isolation<sup>vii</sup>. We commend the government on expanding its COVID-19 data collection efforts to include information on race, income, language and household size to better understand and respond to the pandemic's impact on marginalized communities.

To meet the diverse housing needs across the province, we strongly encourage the government to build on these initiatives by ensuring priority of assistance in the housing system is administered equitably, taking into consideration the barriers to accessing adequate, affordable and stable housing. To ensure the efficacy of this process, we encourage the government to continue engagement with ONPHA, our members and sector partners, in addition to other community organizations and leaders committed to equitable access and outcomes for marginalized communities, including the Ontario Anti-Racism Directorate.

**5. Ensure service levels for accessible units reflect demonstrated need in communities and prioritize provincial engagement with the Canada Mortgage and Housing Corporation (CMHC) to provide flexibility around funding requirements for community housing providers related to accessibility**

We have heard concerns directly from our members around the need for service levels for accessible units to reflect demonstrated need in their communities. For example, many providers report receiving significantly lower volumes of applications for accessible units than other in-demand units (e.g., family units). In addition, accessibility retrofits can be very costly and timely to undertake,



particularly for providers with older portfolios, while CMHC funding requirements often require accessible unit levels that far surpass demonstrated need within communities. As such, we strongly recommend that forthcoming regulations ensure service levels for accessible units reflect demonstrated need in communities through an equitable, evidence-based approach. In addition, we encourage the government to engage with CMHC to align funding requirements to reflect the same parameters, with flexibility for community housing providers based on need in their local context.

However, as the Province advances its economic recovery planning, it is critical that the housing system does not remain siloed from other related systems, notably healthcare, long-term care and homelessness. With a rapidly aging population and waitlists for supportive housing units ranging up to seven years for mental health and addictions alone<sup>viii</sup>, Ontario must ensure the Ministries of Municipal Affairs and Housing (MMAH), Health (MOH), Long-Term Care (MLTC) and Children, Community and Social Services (MCCSS) work collaboratively with all relevant stakeholders on solutions that improve the quality of the housing system and provide a diversity of supports for households in need. Through our Centre for Housing Excellence, ONPHA is committed to working with government and sector partners to lead the development of an Integrated Supportive Housing Action Plan for Ontario by seeking input from stakeholders across multiple sectors.

#### **6. Ensure the access system is comprehensive, standardized and accessible to identify the needs and gaps across the housing system**

Recognizing the current length of waitlists across Service Areas, as well as the challenges many households and individuals face navigating multiple waitlists across the province, we strongly recommend that forthcoming regulations ensure the access system is comprehensive, standardized and accessible to identify the needs and gaps across the housing system. This could help providers easily access and input data from their Service Areas, in addition to expediting waitlists by accurately and fulsomely identifying needs and gaps in the system and ensuring individuals and households in need can easily navigate the system and find appropriate housing solutions.

#### **Detailed recommendations related to proposed changes to the *Residential Tenancies Act, 2006* (RTA)**

Considering Bill 184 was tabled prior to the onset of the COVID-19 pandemic, it understandably lacks some of the context and policy framework that has been since been implemented to protect and support individuals and communities, especially those at high-risk to the impacts of the virus. We commend the government on many of their swift actions and investments and strongly encourage the spirit of those initiatives to continue and accompany the implementation of Bill 184.

Therefore we strongly recommend that the Ontario government:



## **1. Target rent relief supports for unemployed and low-earning tenants, prioritizing high-risk, marginalized communities**

Considering nearly half of all Ontario renters had less than one month's worth of savings prior to the pandemic<sup>ix</sup>, in addition to 45% of tenant households spending 30% or more of their total income on shelter (the highest rate across the country)<sup>x</sup>, housing affordability will remain a top priority as recovery planning begins. While some tenants may find some relief as employment options slowly increase, many will continue to face uncertainty and precarity, especially those in high-risk, marginalized communities.

To ensure tenants are supported sustainably and the ripple effect of rental arrears are mitigated for housing providers across the continuum, we strongly recommend the government accompany Bill 184 with targeted rent relief supports for unemployed and low-earning tenants, prioritizing high-risk, marginalized communities. A variety of rent relief models have already been implemented across the country, demonstrating early success reaching households in need quickly, preventing significant arrears and requiring minimal administration (e.g., British Columbia's Temporary Rental Supplement program<sup>xi</sup>). In addition, we recommend the government strongly consider FRPO's proposed Ontario Rental Assistance Program<sup>xii</sup>, which would provide flexibility to support residents with a wide range of housing needs with the goal of preserving tenancies for the long-term.

## **2. Gradually ease residential eviction moratoriums in consultation with the housing, homelessness, health and related sectors, with considerations for the possibility of a second and third wave of COVID-19**

ONPHA was pleased with the government's swift action to impose a moratorium on residential evictions early in the onset of the pandemic. However, many of our members have shared concerns related to the inability to enforce evictions for tenants posing serious health and safety issues related to COVID-19, in addition to illegal activities and ongoing non-payment of rent (prior to the pandemic).

To meet the needs of our members while ensuring sufficient supports are available for tenants, we strongly recommend the government gradually ease the residential eviction moratorium in consultation with the housing, homelessness, health and related sectors, with considerations for the possibility of a second and third wave of COVID-19. As we remain in the midst of a global pandemic, it is critical that the housing, homelessness, health and related sectors have the opportunity to collaborate closely on solutions, including strong eviction prevention policies implemented through an equity lens to mitigate disproportionate impacts on high-risk, marginalized individuals and households.



### **3. Reintroduce rent control measures to maintain current rent rates and control vacancy levels by eliminating rent increases in newer units and restricting rent increases between tenancies**

While most community housing providers are not directly impacted by rent increases through the RTA, it is a critical area of consideration for the sector, as affordability in the for-profit rental sector has a cascading effect on capacity in the community housing sector. With a provincial vacancy rate of 2.0 and an average unit cost of \$1,277/month<sup>xiii</sup>, coupled with record unemployment and income loss, every opportunity must be explored to prioritize affordability for Ontarians.

Ensuring housing affordability in particular is critical, as housing costs often consume a significant portion of monthly spending and have been increasing at far faster rates than incomes. As such, we strongly recommend the government reintroduce rent control measures to maintain current rent rates and control vacancy levels by eliminating rent increases in newer units and restricting rent increases between tenancies. This will have the dual effect of supporting tenants facing mounting income insecurity during both a health and economic crisis, while also ensuring the community housing, homelessness, health and other related sectors are not overburdened by tenants squeezed out of the rental sector.

### **4. Address shortages at the Landlord and Tenant Board (LTB) to accommodate the proposed increases to LTB responsibilities and workloads, including training for new adjudicators with a focus on community housing contexts and challenges**

With respect to changes proposed through Bill 184, it is critical that as more responsibilities are allocated to the Landlord and Tenant Board (LTB) (e.g., landlords pursuing compensation from former tenants), the LTB has sufficient capacity to manage increased workloads. Prior to the pandemic, the ongoing adjudicator shortage at the LTB was already resulting in costly delays for landlords across Ontario. These delays and the associated costs are felt even more acutely among community housing providers, who have limited budgets and reserves to make up for lost rental revenues. We know MMAH is aware of the resource shortages and the ongoing challenges related to the LTB's closure during the pandemic and are pleased the Ministry is engaging with their counterparts in the Ministry of the Attorney General on these matters.

As such, we strongly encourage both Ministries to continue working in collaboration to address shortages at the LTB and put new adjudicators in place as quickly as possible. Closely related to this, we also urge the government to focus on providing adequate training for these new adjudicators. ONPHA would be pleased to work with the LTB to provide education around the purpose, contexts and challenges related to community housing.





**5. Ensure changes to LTB dispute resolution processes recognize and actively work to mitigate power imbalances between landlords and tenants to ensure equitable outcomes**

While we support the additional proposed changes through Bill 184 that would increase access to mediation and other alternative dispute resolution processes for landlords and tenants, it is critical that these processes recognize the power imbalance between landlords and tenants. While these changes may expedite the resolution process, they may also disadvantage tenants, who often have less resources and knowledge related to landlord-tenant law. As such, we strongly recommend the government ensure changes to LTB dispute resolution processes recognize and actively work to mitigate power imbalances between landlords and tenants to ensure equitable outcomes, with a strong focus on eviction prevention and maintaining housing in suitable condition. This will help to mitigate cascading impacts on other overburdened systems, including the homelessness and health sectors.

Detailed recommendations related to proposed changes to the *Building Code Act, 1992 (BCA)*

The proposed changes to the BCA present tangible opportunities to increase capacity, renew existing stock and facilitate growth in the community housing sector, which will help meet many of the government's objectives through both its Housing Supply Action Plan and Community Housing Renewal Strategy. Over the next 10 years, Ontario needs to build 99,000 affordable and supportive units to meet core housing need, in addition to renewing 260,000 community-owned rental homes<sup>xiv</sup>. To do so efficiently and effectively, it is critical to remove barriers to construction and renewal, particularly for the community housing sector.

Therefore we strongly recommend that the Ontario government support:

- 1. Standardized application processes related to new construction and renewal across jurisdictions to reduce workloads and streamline approvals; and**
- 2. Prioritized and accelerated approval processes for housing projects in the community housing sector to facilitate growth**

Detailed recommendations related to proposed changes to the *Ontario Mortgage and Housing Corporation Repeal Act, 2020*

With respect to the *Ontario Mortgage and Housing Corporation Repeal Act, 2020*, we strongly recommend that the Ontario government:

- 1. Ensure any excess revenues held by the Ontario Mortgage and Housing Corporation (OMHC) are reinvested into the community housing sector**



Upon the dissolution of the OMHC, we strongly recommend that all excess revenues be reallocated to the growth and preservation of the community housing sector. Retaining these and other housing-related revenues within the housing sector is critical to ensuring the system's sustainability and in managing the long-term affordability of housing for all Ontarians over time.

**2. Provide clarity on the party responsible for OMHC's outstanding environmental remediation liabilities**

In addition, OMHC appears to have long-term debt from loans related to housing that has been transferred to Local Housing Corporations, as well as environmental remediation liabilities (related to obligations to clean up environmental contaminants of former public housing properties) associated with Toronto Community Housing Corporation redevelopment projects.

It is unclear who is currently responsible for the environmental liabilities and who will carry them if OMHC is dissolved. To ensure all outstanding OMHC liabilities and debts are accounted for and managed appropriately, without imposing undue burdens on community housing providers or municipalities, we strongly recommend that the government provide clarity on the party responsible for OMHC's outstanding liabilities.

**3. Ensure municipalities receive notice and can provide consent in the event that OMHC properties are transferred under their authority**

Finally, the *Ontario Mortgage and Housing Corporation Repeal Act, 2020* would give the Minister of Municipal Affairs and Housing authority to either sell or dispose of OMHC-owned properties. This would include transferring properties to municipalities, which could be done without notice to or consent from the municipality. To ensure municipalities remain solvent and stable for the long-term, with the ability to meet the service needs of their communities, we strongly recommend that the government provide notice to municipalities in the event that OMHC properties are transferred under their authority, including the ability to provide consent.

Thank you for taking the time to review our submission. ONPHA, our members and sector partners look forward to engaging with the government further on developing and implementing regulations for Bill 184 that will sustain the community housing system for the long-term and ensure communities are supported equitably as the centrepiece of economic recovery planning.

Sincerely,

Marlene Coffey, Chief Executive Officer

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- <sup>i</sup> The total value of social housing units in Ontario is estimated at \$30 billion, however this does not include all assets in the community housing sector, including land, which would likely result in a significantly higher real value for the sector. See: Auditor General of Ontario (2017), 2017 Annual Report, Chapter 3 (3.14). Available at: [http://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1\\_314en17.pdf](http://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1_314en17.pdf)
- <sup>ii</sup> According to the 2018 Canadian Rental Housing Index, an online tool measuring rental health across the country
- <sup>iii</sup> See: Auditor General of Ontario (2017), 2017 Annual Report. Available at: [http://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1\\_314en17.pdf](http://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1_314en17.pdf)
- <sup>iv</sup> See: Statistics Canada (2020), Labour Force Survey, May 2020. Available at: <https://www150.statcan.gc.ca/n1/daily-quotidien/200605/dq200605a-eng.htm?HPA=1>
- <sup>v</sup> See: Ontario Non-Profit Housing Association, Co-operative Housing Federation of Canada (Ontario Region) (2018), An Affordable Housing Plan for Ontario. Available at: [https://onpha.on.ca/Content/Advocacy\\_and\\_research/Advocacy/Affordable\\_Housing\\_Plan\\_for\\_Ontario.aspx](https://onpha.on.ca/Content/Advocacy_and_research/Advocacy/Affordable_Housing_Plan_for_Ontario.aspx)
- <sup>vi</sup> ONPHA, CHF and FRPO's joint advocacy letter on economic recovery available here: [https://onpha.on.ca/Content/PolicyAndResearch/COMMUNICATION\\_WITH\\_GOVERNMENT/2020/Ontario\\_s\\_Plan\\_for\\_Economic\\_Recovery\\_Housing\\_Infrastructure\\_Stimulus\\_to\\_Kick-Start\\_the\\_Economy.aspx](https://onpha.on.ca/Content/PolicyAndResearch/COMMUNICATION_WITH_GOVERNMENT/2020/Ontario_s_Plan_for_Economic_Recovery_Housing_Infrastructure_Stimulus_to_Kick-Start_the_Economy.aspx)
- <sup>vii</sup> See: Homeless Hub (2020), Impact of COVID-19: Canada's LGBTQI2S Community in Focus. Available at: <https://www.homelesshub.ca/resource/impact-covid-19-canada%E2%80%99s-lgbtqi2s-community-focus>; Maytree (2020), Any post-pandemic recovery plan must include society's most vulnerable. Available at: [https://maytree.com/publications/any-post-pandemic-recovery-plan-must-include-societys-most-vulnerable/?mc\\_cid=2c219c3a3c&mc\\_eid=b92ae8b659](https://maytree.com/publications/any-post-pandemic-recovery-plan-must-include-societys-most-vulnerable/?mc_cid=2c219c3a3c&mc_eid=b92ae8b659)
- <sup>viii</sup> See: Auditor General of Ontario (2016), 2016 Annual Report. Available at: [https://www.auditor.on.ca/en/content/annualreports/arreports/en16/v1\\_307en16.pdf](https://www.auditor.on.ca/en/content/annualreports/arreports/en16/v1_307en16.pdf)
- <sup>ix</sup> See: Canadian Centre for Policy Alternatives (2020), The Rent is Due Soon: Financial Insecurity and COVID-19. Available at: <https://www.policyalternatives.ca/publications/reports/rent-due-soon>
- <sup>x</sup> See: Statistics Canada, 2016 Census of Population. Catalogue no. 98-400-X2016225
- <sup>xi</sup> See: BC Housing (2020), BC Temporary Rental Supplement (BC-TRS) Program. Available at: <https://www.bchousing.org/BCTRS>
- <sup>xii</sup> See: Federation of Rental-Housing Providers of Ontario (2020), Supporting tenants during the COVID-19 Crisis. Available at: <https://www.frpo.org/wp-content/uploads/2020/03/1-FRPO-Proposal-to-Support-Tenants-During-COVID-19-Crisis-pdf.pdf>
- <sup>xiii</sup> See: Canada Mortgage and Housing Corporation (2020), Ontario — Rental Market Statistics Summary by Metropolitan Areas, Census Agglomerations and Cities. Available at: <https://www03.cmhc-schl.gc.ca/hmip-pimh/en/TableMapChart/Table?TableId=2.1.31.2&GeographyId=35&GeographyTypeId=2&DisplayAs=Table&GeographyName=Ontario>
- <sup>xiv</sup> See: Ontario Non-Profit Housing Association, Co-operative Housing Federation of Canada (Ontario Region) (2018), An Affordable Housing Plan for Ontario. Available at: [https://onpha.on.ca/Content/Advocacy\\_and\\_research/Advocacy/Affordable\\_Housing\\_Plan\\_for\\_Ontario.aspx](https://onpha.on.ca/Content/Advocacy_and_research/Advocacy/Affordable_Housing_Plan_for_Ontario.aspx)