



ONTARIO NON-PROFIT  
HOUSING ASSOCIATION

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**Subject: Improving Supportive Housing in Ontario**

Dear Assistant Deputy Minister Paul,

Thank you for the opportunity to contribute to the Province's Engagement on Improving Supportive Housing. We look forward to continuing to work with all levels of government, non-profit and private sector partners to implement innovative, community-based solutions that improve services for people, drive greater system efficiency, help prevent and address homelessness and ensure long-term community sustainability.

As you know, the Ontario Non-Profit Housing Association (ONPHA), founded over 30 years ago, 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<sup>1</sup>.

The COVID-19 pandemic has disproportionately impacted marginalized communities, including Black, Indigenous and other racialized communities, 2SLGBTQQIA+ people, low/limited-income people, people experiencing homelessness, people with disabilities and seniors, in large part due to the disproportionate rates at which these communities experience poverty, homelessness and poor access to adequate and appropriate healthcare and supports. In response, we understand the critical importance of long-term, sustainable housing that meets diverse community needs. 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, community-based approaches to housing.

ONPHA is pleased to see the Province moving forward with broad consultation and engagement to improve supportive housing, as well as the broader community housing sector. ONPHA engages regularly with our diverse membership, including supportive and alternative housing providers, Indigenous housing providers and providers serving seniors. As such, we are well positioned to share a variety of perspectives from across the community housing sector, and our responses below reflect feedback we have received directly from our members.



Throughout each of the five survey areas – supply, access, efficiency, complex needs and COVID-19 – our feedback focuses on several consistent themes that are fundamental to transforming the supportive housing system to work better for people and ensure that resources are used with the greatest impact possible. Among ONPHA’s primary recommendations, we strongly encourage the government to prioritize the following actions:

1. **Invest in an integrated approach**: this must include cross-sector partnerships with relevant sectors and partners (e.g., housing, health, long-term care, social assistance, homelessness) to coordinate access and improve system efficiencies
2. **Commit to a client-centred approach**: this must involve a proactive approach with effective communication and flexible program requirements to meet diverse needs for individuals and communities
3. **Prioritize the supportive housing sector for development**: this must include an expanded toolkit of programs and policy options that increase access to capital, funding and land for supportive housing providers
4. **Partner with Indigenous communities and organizations**: this must foster a “For Indigenous, By Indigenous” approach to ensure culturally-relevant supportive housing is available and accessible to Indigenous communities, based on principles of truth and reconciliation
5. **Engage with diverse communities with lived experience**: this must include marginalized communities who experience disproportionate rates of poverty and homelessness and require a diverse range of supports, including Black and other racialized communities, 2SLGBTQQA+ people, low/limited-income people, people with disabilities and seniors

This submission serves to complement and expand upon ONPHA’s completed Engagement on Improving Supportive Housing survey (submitted October 30, 2020). Please note that we have targeted responses to questions that are relevant to ONPHA and our membership.

Thank you for taking the time to review our submission. We look forward to further opportunities for ONPHA, our members and sector partners to continue working closely with the Province to develop long-term, sustainable solutions to improve supportive housing, renew the community housing system and ensure communities are supported equitably for the long-term.

Sincerely,

Marlene Coffey  
Chief Executive Officer



CC:

Karen Glass, Assistant Deputy Minister, Strategic Policy Division, Ministry of Children, Community and Social Services

Rupert Gordon, Assistant Deputy Minister, Community Services Division, Ministry of Children, Community and Social Services

Melanie Kohn, Acting Assistant Deputy Minister, Mental Health and Addictions, Ministry of Health

MSO Housing Team Leads, Ministry of Municipal Affairs and Housing



## ONPHA's Response to Ontario's Engagement on Improving Supportive Housing Survey

### **1. Supply – Protecting, growing and improving supply**

#### *1.1 Aside from new investment, what is the number one challenge your organization has faced when creating and maintaining the supply of supportive housing?*

It is crucial that available funding meets both the operational and capital needs of providers to ensure current stock and supports can be maintained, while creating opportunities to increase supply and ensure the long-term sustainability of the sector. The current system relies on a number of funders and ministries for funding and supports, which serves to limit the alignment of capital and operational dollars. Current funding envelopes for operations do not support long-term capital planning, as capital projects are often approved years in advance of buildings opening for residents, while operational funding is unavailable for the same timeframe. This in turn creates significant risks for supportive housing providers to advance new development projects, while at the same time ensuring that adequate supports are available to meet the needs of tenants requiring a diversity of supports. Moreover, it can negatively impact operation performance required for the approval of capital budgets. In short, supportive housing providers need capital dollars that are supported by guaranteed operational funding.

Closely related, supportive housing providers must be prioritized in the design and implementation of affordable housing supply programs and incentives. Historically, these programs have favoured private developers who can quickly provide “shovel-ready” projects. However, these projects do not always translate into lasting investment, as affordable housing initiatives have typically capped rents for 20 years, after which rents can increase beyond the affordability threshold for most Ontarians. Moreover, such projects do not have the capacity to deliver the diversity of supports required to meet the complex and intersecting support needs of tenants across Ontario.

Prohibitive funding requirements also pose challenges for supportive housing providers in accessing capital funds. For example, the National Housing Co-Investment Fund requires all projects within the new construction and repair (renewal) streams to meet or exceed accessibility requirements for 20 per cent of units and common areas. While it is critical to build inclusive buildings and communities, these threshold requirements present significant challenges for supportive housing providers by way of significant costs, technical challenges, tenant relocation and reduced size and/or number of units. Moreover, these requirements often do not accurately reflect community need, leaving some



housing providers struggling to match tenants (who have varying levels of income, health and social supports) to existing accessible units. This model also fails to address the diversity of accessibility needs for tenants with a variety of disabilities and support needs.

Underlying this and many of the other challenges facing supportive housing providers is the lack of integration within the sector. The current community housing system as a whole is siloed and does not adequately engage with other relevant sectors, such as healthcare, long-term care, developmental services, social assistance and homelessness. Moreover, recent supportive housing investments have typically focused primarily on mental health and addictions. While vitally important and necessary, there is also a pressing need to look at the integrated provision of supports for seniors to age in place and supports for individuals with physical, developmental and cognitive disabilities and/or acquired brain injury to maintain their housing. The built form to support the range of supportive housing needs (that often shift over time) can in many respects be similar, with variations in the supports provided. As such, flexibility in planning and the alignment of all individual and community needs within supportive housing portfolios is critical.

*1.2. Based on your organization's experience, what is the one most important action government could take, apart from new investments, to help protect and grow the supply of supportive housing? Please be as specific as possible in your advice (e.g., identifying specific changes to program rules or provincial policies/processes).*

In response to the challenges outlined above, it is critical that government work to align operating and capital funding envelopes for supportive housing across funders and ministries, to better integrate the delivery of supportive housing funding for more effective and efficient programming. This would have the dual impact of addressing disjointed, short-term responses that lead to reactive program design and ineffective outcomes, while also supporting long-term community planning. Part of this process must include realigning the definition of supportive housing around the services being provided and/or the population being served (see below for specific recommendations related to the definition of Indigenous supportive housing), rather than relying on designations by legacy programs that exclude providers offering de facto supports for rent-geared-to-income (RGI) units. This will serve to formalize existing capacity within the system and help to sustain and grow the supply of supportive housing units.

Closely related to this, government must prioritize supportive housing providers in accessing capital funding to support investment and grow the supportive housing sector. There are a number of policy and program solutions that would prioritize access to funding and support supportive housing development. This could include providing upfront project funding to get projects off the ground,



prioritizing non-profit developers in the design of affordable housing supply initiatives and incentives, ensuring greater amounts of surplus land are available to the supportive housing sector and supporting community-based acquisitions strategies for distressed and/or vacant residential and commercial buildings.

*1.3. For organizations that have existing capital assets and wish to leverage them to create new supply, what is the one most pressing difficulty you have encountered?*

While many established housing providers are in a good position to leverage their capital assets to create new supply, these providers often have limited ability to service more debt. This can be a result of cash flow, debt limits set by a local council and/or former program requirements that require pristine debt to be registered on title. The limited borrowing ability of some housing providers will result in the exclusion of applicants who are otherwise ideally positioned to deliver and manage new affordable housing projects. Moreover, many providers face challenges managing the processes and cash flow required to support the acquisition of available land because they are unable to compete with private sector developers.

It is also critical that supportive housing providers have access to additional rent supplement agreements to ensure new supply is accessible and affordable for tenants for the long-term and can meet community demand.

*1.4. To what extent do you agree with the following statement: “I think that cross-sector partnerships are critical to developing new supply of supportive housing.” (e.g., partnerships between organizations across the housing, healthcare, justice, social services and other sectors)*

ONPHA strongly agrees with this statement. Following some of the challenges outlined above, cross-sector partnerships are critical to the transformation and sustainability of the supportive housing sector. Cross-sector partnerships actively work to remedy the challenges associated with having multiple funders and ministries, each with their own program expectations, objectives and outcomes. Partnerships enable the implementation of integrative, flexible and client-centred programs that recognize that individuals may require a variety of supports at various times, especially as Ontario’s population continues to age quickly. Moreover, coordination across sectors facilitates the provision of wrap-around services that support individual and community health and wellbeing, while also improving efficiencies and outcomes and decreasing costs.



In particular, it is critical that current housing subsidy programs are expanded and augmented to work in coordination with other programs to meet the diverse housing needs of Ontarians. This would help ensure that all low/limited-income individuals and families, including social assistance recipients, have access to adequate supports and safe, affordable housing. Otherwise, individuals and families across Ontario with a diversity of housing and support needs will remain in deep poverty, especially as housing costs continue to increase, while access remains limited.

Moreover, it is critical that all cross-sector partnerships, planning and program design include strong partnerships with Indigenous housing providers and local Indigenous communities and organizations based on principles of truth and reconciliation. Considering the disproportionate rates of Indigenous homelessness and core housing need, poverty, incarceration and poor health, education and employment outcomes (among other social and economic indicators), a diversity of Indigenous perspectives must be integrated into the design of supportive housing programs to ensure not only that culturally-relevant approaches are available and accessible to Indigenous tenants, but moreover, that Indigenous programs are **designed for and by** Indigenous communities to ensure cultural continuum, safety and healing. Of the utmost importance is that Indigenous supportive housing providers are able to define supportive housing as it is relevant to their tenants and communities, while also being able to access adequate funding and supports to build capacity and ensure sustainability (see below for more information).

### *1.7. What is the number one barrier to successful transitions into other types of housing?*

Currently, housing supply and supports are disconnected from one another as individuals move between housing models and/or care settings. Successful transitions necessarily require adequate and appropriate community-based supports along both the housing and health continuums in tandem. This process must include a broad range of supports, including for mental health and addiction challenges, developmental disabilities, physical disabilities, acquired brain injury, concurrent disorders and frail health. Moreover, the supports must be culturally-relevant and accessible through a client-centred approach.

### *1.8. Please describe any innovative opportunities you have leveraged to create new supply of supportive housing (e.g., utilizing surplus municipal lands, conversion/repurposing of existing properties, collaborating with local providers to deliver supports in your agency's housing units).*



Several of our members have engaged in innovative, collaborative development projects to create new supportive housing supply. These projects have brought together municipal, non-profit and provincial agencies for both new development and building regeneration, successfully aligning capital and operating funding to ensure sustainability and mitigate risks associated with the misalignment of capital and operating funds (as outlined above). In these cases, the owner and operator solely assume the associated risks, bringing stability to the project.

For example, Peel Region has adapted their procurement models to prioritize the non-profit sector for grant funding. These new negotiable processes focus on leveraging contributions outside of capital performs by engaging with social services and health ministries to negotiate upfront operational funding to support the initiatives.

In addition, we have been pleased to see municipalities collaborating with local housing providers by making available surplus lands for new development, while also working together to operate and/or own the buildings. Similarly, many municipalities are developing long-term infrastructure plans that aim to leverage regionally owned lands for development, while designating units for supportive housing in partnership with community organizations to lead operations. These public-non-profit partnerships effectively leverage the assets, skills and experience of both partners to serve the needs of local communities.

### *1.9. If your organization has not explored such opportunities, what has been the main barrier in doing so?*

One of the primary barriers that providers report with respect to creating new supportive housing supply is the level of risk that they are comfortable assuming in taking on new developments, especially in light of uncommitted operational funding and supports. Without guaranteed operational funds attached to capital dollars, providers may not feel comfortable and/or prepared to assume the risk, both related to the project itself, as well as in their partnership with Service Managers and municipalities.

### *1.10. Based on your organization's experience, please describe any other partners in your community you feel could play a stronger role in creating new supply of supportive housing.*

As outlined above, it is critical for the Province to work in strong and equitable partnership with Indigenous organizations and communities to develop and deliver supportive housing across Ontario





that meets individual and community needs. Similarly, the Province must engage more fulsomely and intentionally with other marginalized communities and organizations, who face a number of barriers to accessing affordable, culturally safe housing, including Black and other racialized communities, 2SLGBTQQA+ people, low/limited-income people, people experiencing homelessness and/or with lived experience, people with disabilities and seniors.

Moreover, despite providing de facto care and support services for tenants, there are also a number of other community housing providers (e.g., alternative funding providers, providers with Supports for Daily Living (SDL) funding for certain clients, etc.) that are currently not engaged in discussions around supportive housing. In light of the intersecting and growing support needs of individuals and communities across Ontario, it is critical that government recognize the significant number of housing providers currently delivering housing with supports to varying degrees, and commit to engaging them in discussions around supportive housing policy and program design and delivery.

As the voice of the broad community housing sector, ONPHA is a natural and valuable partner to work collaboratively with the Province to support stakeholder engagement and facilitate strong cross-sector partnerships to inform new and alternative approaches that support community housing sustainability and growth.

## **Targeted Supply Questions: Ministry of Health and Ministry of Children, Community and Social Services**

*MCCSS.1.b. What is the top factor influencing your decision (re: expiring operating agreements)?*

Housing providers across the sector are approaching ONPHA for support as they plan for the expiry of their operating and mortgage agreements. As a member association, we have considerable concerns about the lack of coordinated supports available for providers from the Province and Service Managers that will ensure the sustainability of housing programs and supports for the long-term. Without certainty around ongoing funding models, providers reaching the end of mortgages and operating agreements cannot effectively and strategically plan for the future, severely compromising housing affordability across the province.

In response, ONPHA has recently launched our Solutions Lab: Community Housing for the Future, Taking Collective Action Towards Resiliency. This Solutions Lab will bring together sector associations, provincial and Service Manager representatives and a wide variety of housing providers to discuss opportunities to develop new, innovative funding models to support the sustainability of the broad community housing sector. This initiative strives to create efficiencies and improve outcomes for the



sector through the development of a suite of solutions that will be desirable, feasible and viable for a wide range of providers, which could include business model innovation, approaches to tenant and community engagement and other strategies to ensure capital needs are met.

Ultimately, these solutions will ensure housing providers have the capacity to remain and/or become viable once they have reached the end of their mortgage and/or operating agreement, while creating efficiencies and delivering savings to the overall system. These savings will create opportunities for re-investment into the sector to renew, build and support community housing, which will in turn achieve our shared agenda through Ontario's Community Housing Renewal Strategy and ONPHA's Strategic Plan.

*MCCSS.2. How can the Ministry of Health or Ministry of Children, Community and Social Services facilitate organizations to increase supply including utilizing existing properties to their full potential or selling property and reinvesting proceeds?*

As outlined above, the non-profit sector must be prioritized for access to supply funding and initiatives and should be considered the agent of choice to develop and expand community and supportive housing across the province in perpetuity. Critical to success will be an integrated approach with the Ministry of Municipal Affairs and Housing, focused on meeting emerging and changing individual and community needs.

ONPHA is well-positioned and prepared to work with all ministries to develop mechanisms that support organizations through assessment and capacity building activities. This will help organizations realize and leverage opportunities that exist within their current portfolios, while minimizing overall risk to current operations. Partnerships between established sector organizations, government, non-profit organizations and the private sector that focus on leveraging the assets and experience of all parties will ensure the most effective responses, while yielding the most cost-effective solutions.

*MCCSS.3. Are there supportive housing needs that are not being met in your community?*

Yes. As outlined above, the current supportive housing system's disjointed, program-focused approach, as well as the limited provincial supply, creates many barriers to access and consequently fails to meet the diversity of individual and community needs. In addition, the current approach is largely diagnosis-based, which impacts equitable opportunities for marginalized communities, and



fails to provide sustained, coordinated support for individuals with complex needs, especially as they age through the system.

Positive outcomes require service access to be flexible, transparent and open for all applicants, with funding and services targeted to needs over time.

## **2. Access – Making it easier for people to be matched with the right housing and supports**

### *2.1. From your organization’s perspective, what do you see as the top barrier people and their families face when trying to access supportive housing?*

Individuals and families face a number of pressing issues related to access, including but not limited to inadequate supply (including culturally-relevant supportive housing), lengthy wait lists and poor coordination among systems and programs.

As outlined in the “Supply” section above, inadequate supply continues to be a significant barrier for households requiring supports to access supportive housing (as well as affordable housing more broadly). Currently, Ontario has less than half of the supportive housing units required for mental health and addictions alone<sup>ii</sup>, not including persons with other disabilities and seniors. Yet, seniors are currently the fastest growing demographic in Ontario, with 3 million seniors anticipated in 2023, up from 2.3 million in 2017<sup>iii</sup>. Additionally, an assessed 15,700 adults with developmental disabilities are waiting for residential services<sup>iv</sup>.

Currently, waitlists for supportive units range up to seven years across the province<sup>v</sup> and a minimum of 30,000 new supportive housing units are required in Ontario for mental health and addictions challenges alone<sup>vi</sup>. There are also many individuals living in the broader community housing sector (not dedicated supportive housing) and in the private market sector who require various levels of support to find affordable housing and/or to remain stably housed. Moreover, with the disproportionate impacts of COVID-19 and housing affordability on racialized and marginalized communities, we expect this need to grow significantly. Because of these lengthy timelines and supply gaps, we also understand that some individuals do not even apply for supportive housing, assuming that they will never be able to secure a unit. As such, we understand the need to likely be much greater than is captured in current waitlist data.

Beyond supply and wait list challenges, the lack of coordinated access across various government systems and programs presents significant barriers for individuals requiring supports to navigate these systems and access the appropriate program(s). Moreover, individuals’ needs vary over time



and can often be intersecting, requiring additional capacity and often presenting barriers, as individuals are required to meet multiple program criteria to maintain funding. Because the system works reactively (rather than proactively through the integration of health and housing systems), individuals are often not able to access services until they have already engaged in healthcare interventions (e.g., through hospital and emergency care). Not only are such interventions much more costly to the public, but they can also take a personal toll on individuals who may have had negative experiences with the healthcare system<sup>vii</sup> and may face additional trauma because they are unable to proactively access adequate and appropriate supports.

*2.2. From your organization’s perspective, to what extent do you agree with the following statement: “Ontario’s supportive housing programs effectively serve diverse populations by responding to their specific housing and support needs.” e.g., Indigenous people, racialized communities, LGBT2SQ+ communities, etc.*

ONPHA strongly disagrees with this statement. Because of the significant shortage of supportive housing supply across Ontario, as well as the lack of coordinated funding and supports, there are no target populations whose housing and support needs are being effectively served. Moreover, very few target populations within Ontario’s diverse population have dedicated supportive housing programs available to them, including Black and other racialized communities and 2SLGBTQQIA+ people. Yet, COVID-19 has exacerbated the disproportionate rates of core housing need among 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>viii</sup>. While there are many organizations working tirelessly to provide essential programming that support many diverse, marginalized communities, without adequate support, supply and coordination, these organizations cannot meet the vast and growing supportive housing needs across the province.

Where targeted supportive housing programming exists, it remains inadequate because it fails to effectively and sustainably support the organizations who continue to deliver highly valuable programming. For example, Indigenous supportive housing providers in urban, rural and remote areas report significant supply shortfalls and capacity deficits. Moreover, funding fails to reflect and meet community needs, while programming requirements and definitions overlook the critical need for true partnership with Indigenous communities to develop culturally-relevant approaches. Through ONPHA’s [Urban and Rural Indigenous Housing Plan for Ontario](#), we identify the need for at least 22,000 subsidized Indigenous-owned and operated units over the next 10 years to meet the growing housing needs of off-reserve Indigenous populations in Ontario. However, many Indigenous community housing providers are not currently eligible for supportive housing funding, despite



offering culturally-relevant programming and often facilitating cross-sector partnerships with local support agencies for their tenants to access support services.

*2.3. From your organization's perspective, what are the key elements of an effective coordinated access system? (e.g., sector/community-specific common assessment approaches, centralized client wait lists, referral protocols, etc.)*

To ensure an effective coordinated access system, it is critical for the system to be client-centred, rather than program focused. Doing so would help ensure both the process itself, as well as an applicant's ultimate access to housing and supports, is as simple as possible to navigate, while also producing effective outcomes based on individual need.

A client-centred system requires effective communication that is easy to follow, accessible and inclusive. This requires the removal of barriers to access with attention to disability, language, gender and sexual identify, race and ethnicity and any other intersecting areas where applicants may experience discrimination.

In addition, a client-centred system requires flexibility to meet individuals at a point in time, ultimately taking the onus off of the individual to navigate through multiple access points and/or reapply for program access on multiple occasions. Flexibility must also be applied to the criteria required for intake to further reduce access barriers and ensure applicants are not excluded and/or alienated due to administrative or clerical errors.

The access system should also facilitate connections between wait lists, rather than having separate wait lists for supportive housing and rent-geared-to-income (RGI) units. This would effectively reduce wait list lengths and help connect individuals to appropriate housing faster. In addition, the system must provide increased referral support to better meet the immediate needs of applicants, as well as simplified reporting requirements to reduce administrative burdens for staff and ensure the system remains flexible and client-centred.

*2.4. Based on your organization's experience, what is the number one action the province could take to support the broader adoption of coordinated access systems for supportive housing programs?*

To help mitigate the effects of an overly complex system across three ministries, the Province should implement a secretariat function under one single ministry, with indirect lines of accountability across funders to ensure program requirements, objectives and outcomes are being met. This would also



serve to eliminate the current duplication of work across ministries, while streamlining and simplifying reporting requirements using available and current data, ultimately supporting capacity building across the sector. This secretariat could use a similar model to the Community Homelessness Prevention Initiative (CHPI), which effectively aligns program funding across two ministries with a built-in accountability framework. The CHPI model is also favourable in light of its flexibility, as program outcomes can be selected based on local needs.

In addition, it is critical to ensure continuity and consistency across Service Manager areas. Housing providers across the province report inconsistent interpretations of programs, requirements and policies between different Service Managers. Not only does this create significant challenges for housing providers related to program administration and reporting, but it also creates barriers for individuals moving across Service Manager borders.

### *2.5. How can the province better support access to culturally safe supportive housing for Indigenous people?*

As outlined in several sections above, it is critical that the Province first and foremost enter into true partnership with Indigenous organizations and communities based on principles of truth and reconciliation to ensure Indigenous supportive housing is developed for and by Indigenous peoples.

Several Indigenous housing providers reported that a crucial component of this process is to redefine “Indigenous supportive housing” through a culturally-relevant lens to foster a more expansive inclusion of Indigenous supportive housing providers, while also recognizing the diversity of Indigenous priorities and perspectives across the province. This must include a recognition of the inherent supportive nature of Indigenous housing providers in delivering culturally-relevant and safe programming, while also providing and/or connecting their tenants to culturally-supportive services through local support agencies. Ensuring cultural continuum in housing, services and supports is critical to help address the lasting impacts of racism, colonialism and intergenerational trauma, while also helping move Indigenous people along the housing and health continuums.

In addition, Indigenous housing providers face consistent capacity challenges and must be prioritized to access capital and operational funding that meets community needs. Currently, a large number of Indigenous housing providers are severely understaffed and under-resourced, significantly impacting operations and opportunities for sustainability and growth. Moreover, the delivery of programs along the cultural continuum requires formal program support to ensure diverse tenant needs can be addressed.

Currently, many Indigenous housing providers lack substantial control, management, vision and direction in the sector and over their limited resources. Of the 56 urban and rural Indigenous housing providers in the province, all operate under different program and funding requirements, networks,



agreements and partnerships, with significant discrepancies around their ability to meet program objectives and access resources. As outlined above, inconsistent program interpretation between Service Manager areas is also an ongoing challenge among Indigenous housing providers, in addition to the sustained racism and discrimination that providers and their tenants often face.

ONPHA strongly recommends the Province commit to an [Urban and Rural Indigenous Housing Plan for Ontario](#) in true partnership with Indigenous partners across the province, recognizing the diverse needs and perspective in the sector. This plan would help to address the increasing housing and support needs of urban and rural Indigenous populations and significantly increase capacity and opportunities for growth among Indigenous housing providers. At the same time, it would achieve significant public cost savings in social services, healthcare, shelter services, justice and foster care, significantly boost Indigenous personal incomes through improved employment and education outcomes and stimulate the provincial economy<sup>ix</sup>, all of which are urgently needed in response to COVID-19.

Since ONPHA launched its Urban and Rural Indigenous Housing Plan for Ontario in May 2020, we have been working closely with our Urban and Rural Indigenous Housing Advisory Committee (URIHAC), and will be embarking on engagement with Indigenous housing providers from across the province in November 2020 to determine next steps to implement the plan's six recommendations. ONPHA would be pleased to facilitate engagement between the Province and the URIHAC to help build strong, equitable partnerships with Indigenous organizations and communities across Ontario. As such, we strongly encourage the Province to actively participate in and support the implementation of the plan's recommendations in partnership with ONPHA, the URIHAC and the broad Indigenous community housing sector.

### **3. Efficiency – Using current resources more efficiently to maximize their impact for people**

*3.1. To what extent do you agree with the following statement, reflecting on issues beyond investment: “I am satisfied with Ontario’s current approach to supportive housing”.*

ONPHA strongly disagrees with this statement.

*3.2. Based on your answer to the previous question, describe the number one benefit and challenge associated with Ontario’s current approach to supportive housing?*



As outlined above, individuals face a number of challenges to accessing adequate housing and supports through Ontario's current disjointed and fragmented supportive housing system. Applicants are required to navigate a complex system with minimal support involving multiple ministries, each with different roles and responsibilities. Program staff themselves report significant challenges working within the system, citing overly complex application processes and the need to streamline reporting requirements.

Moreover, considerable gaps remain in the provision of service, both by way of access (e.g., navigating the access system and multiple wait lists), as well as for providers who remain ineligible for supportive housing funding, despite providing de facto supportive housing services (as outlined above, e.g., Indigenous housing providers, alternative funding providers, providers with Supports for Daily Living (SDL) funding for certain clients, etc.). This lack of access and coordination leads to poorer quality of care, wherein individuals requiring supports instead spend extended time in the healthcare, justice and shelter systems and/or experiencing homelessness. This serves to both alienate individuals from receiving the services and supports that they require (which may ultimately lead to higher levels of trauma), while also overburdening costly public systems.

As such, it is critical for the supportive housing system to centralize and modernize its processes, including the access and wait list systems, as well as funding models and program delivery. As outlined above, we recommend implementing best practices from the Community Homelessness Prevention Initiative (CHPI) to implement a centralized, flexible and proactive model for program and funding design and delivery.

### *3.3. Considering various transfer payment agreements, program rules and reporting requirements, please rate the level of administrative burden experienced by your organization in delivering supportive housing?*

As outlined above, there are significant administrative burdens across the supportive housing system as a result of inconsistent reporting requirements and program interpretations, ineffective communication, limited flexibility and duplication of work across ministries, in addition to insufficient technological supports (i.e., that are accessible, agile and mobile to support in-field data capture).

Through a centralized, consolidated system of programs and services with increased flexibility, wasteful administrative costs and burdens could be eliminated both internally and externally, including duplicated data sharing and reporting between ministries, as well as from external specialists in the healthcare system. It is critical for the government to focus on developing flexible requirements and standards that meet local and individual needs, supported by an accountability framework that can assess and improve upon program impacts and outcomes.





### *3.4. From your organization's perspective, please identify the top 3 opportunities to encourage greater innovation and efficiency in the supportive housing system?*

Cross-sector partnerships that break down silos and integrate program and service provision are critical to fostering innovation and efficiency in the supportive housing system. As outlined above, there are diverse groups of housing providers that have traditionally not been adequately engaged and represented in supportive housing discussions (e.g., Indigenous housing providers, alternative housing providers, etc.), along with relevant partner organizations and sectors in healthcare, long-term care, social assistance, homelessness and other related sectors. Moreover, it is crucial that clients, individuals with lived experience and members of diverse, marginalized communities have a seat at the table to share their needs, priorities and interests.

Without long-term, secure investment in the system, program design is often reactive, with outcomes that only meet short-term requirements and often fail to lead to broad system changes and sustainability. Short-term funding often leads to increased costs as a result of frequent staff turnover, which also decreases institutional knowledge and experience and leads to greater inconsistency and poorer outcomes. Long-term, sustainable funding facilitates proactive program planning, which fosters greater innovation and creates wide-spread system efficiencies, serving to effectively reduce spending and reduce costs in the long-term, while also creating effective system solutions that meet local and individual needs.

ONPHA recommends that the government support pilot initiatives across the supportive housing sector through dedicated, committed funding. Understanding that innovation can grow exponentially in an environment free from risk aversion, it is important that such funding flows actively and consistently to new and emerging best practices, which can then be implemented across the sector. One potential example of an innovative and cost-effective funding model for the Province would be the funding of partnerships between community housing providers and supportive housing providers in existing homes.

As outlined above, it is also critical that the system strongly prioritize flexibility across programming and funding models to proactively serve the diversity of providers and communities across Ontario, recognizing the distinct and unique needs of providers in different regions serving various populations. For example, some rural, remote and northern providers may face challenges attracting staff with appropriate skills and competencies and may require financial incentives to ensure appropriate staff are available to deliver their programming. As outlined above, it is also critical that funding supports the development of culturally-relevant, safe programming for marginalized individuals and communities requiring supports.



#### **4. Complex Needs – Better serving people who need supports from multiple service systems**

##### *4.2. What is the number one challenge your organization faces when developing supportive housing projects to serve people with complex needs?*

One of the primary challenges to supporting people with complex needs is the lack of coordinated services and supports across the health and housing continuums. People with intersecting support needs often face tremendous difficulty navigating the current supportive housing system, especially if they require supports from multiple funding and program streams. Moreover, the current, disjointed system fails to identify accountability for services and as such, can create significant inefficiencies, leading to higher system costs and poorer outcomes, while alienating individuals in greatest need.

To implement a client-centred approach that meets diverse and complex tenant needs, it is critical for there to be coordination and collaboration among all funders and ministries, supported by sustainable funding. This model is fundamental to the delivery of wrap-around supports and services that meet both individual and community needs.

In addition, it is also crucial that adequate, sustainable capital funding is made available to the supportive housing sector to repair and renew existing stock and build new supply to ensure that permanent, affordable homes are available for individuals with a variety of support needs for the long-term.

##### *4.3. What is your number one recommendation for how government can make it easier for people with complex needs that cross different service systems to get the help they need?*

As outlined above, it is critical that government invest in an integrated approach to supportive housing to better meet the needs of individuals with intersecting support needs, as well as those who face challenges accessing supports and services. The goal should not be to support people with complex needs to navigate across systems, but instead, to create a client-centred approach through one system that coordinates services to meet individual needs.

Beyond supporting individuals, an integrated approach would also help end chronic homelessness and achieve major provincial cost savings for Ontario's health, justice, social services and shelter



systems. For example, for every dollar spent on mental health and addictions support alone, \$10 is saved in costs related to the health and justice systems<sup>x</sup>.

While critical, we also understand the need for integrated, culturally-relevant supports beyond investments solely in mental health and addictions, including for seniors to age in place and for individuals with a range of disabilities and intersecting support needs.

As part of an integrated approach, we also strongly recommend the government implement a centralized access system and database, with strong applicant support and referral opportunities to guard against any lost and/or alienated applications.

Over the next year ONPHA will be engaging broadly with key stakeholders from the supportive housing sector, as well as partners from the health, homelessness, social services and other related sectors to develop an integrated supportive housing plan for Ontario. As such, we call on the Province to work closely with ONPHA and our sector partners on the plan's implementation and commit to adequate, sustainable funding to support diverse housing needs across the province.

*4.4. Based on your organization's experience, please describe other partners in your community that you feel could play a stronger role in the design and delivery of supportive housing programs for people with complex needs.*

As outlined above, it is critical for government to enter into true partnership with Indigenous organizations and communities to effectively meet the diverse support needs of Indigenous communities across the province using a "For Indigenous, By Indigenous" model.

Moreover, there are a number of other marginalized communities across Ontario that face disproportionate rates of core housing need, homelessness and poverty that require supportive housing but have traditionally not had equitable opportunities for meaningful engagement in policy and program design and delivery. This includes but is not limited to Black and other racialized communities, 2SLGBTQQIA+ people, low/limited income people, people experiencing homelessness, people with disabilities and seniors. To ensure effective, long-term solutions that meet diverse individual and community needs, it is paramount to implement policy responses based on community experience and expertise.

In a similar vein, we strongly recommend that government promote complete communities and support robust community consultation around development. Land use planning and policies should promote the development of complete communities, which aim to integrate land use planning, transportation planning and community design to meet the diverse needs of all residents. To truly



understand and meet the needs of individual communities, government must commit to, support and encourage robust community consultation around development decisions and proposals.

*4.5. Please feel free to share any lessons learned, best practices or innovative approaches your organization has identified in effectively serving people with complex needs.*

A number of innovative approaches continue to take shape and be implemented across the province to meet diverse and intersecting support needs.

The Urban Indigenous Homeward Bound Program (UIHB) (supported by Ontario Aboriginal Housing Services, Ontario Federation of Indigenous Friendship Centres, Ontario Trillium Foundation and local poverty reduction initiatives) is an innovative initiative that supports sole-parent Indigenous women to find meaningful employment, enhanced wellbeing and prosperity for themselves and their children through culturally-based services and supports, including access to safe, stable housing, culture, childcare, education and life-skills, transportation, case coordination, health access and mental health supports<sup>xi</sup>.

While the UIHB program is still in its early stages, preliminary evaluations have demonstrated the importance of implementing culturally-based, wrap-around supports and services (with a strong emphasis on housing) to help eliminate barriers to education and employment, while also helping to break cycles of intergenerational trauma and poverty for sole-parent Indigenous women and their families. The program has also seen tremendous success implementing cross-sector partnership with academic institutions, private sector partners and other local support agencies<sup>xii</sup>.

Another Homeward Bound program operated by WoodGreen Community Services in Toronto similarly demonstrated positive individual outcomes for participants, in addition to a significant return on investment (i.e., for every dollar invested in the program, \$4 is returned to society)<sup>xiii</sup>.

To help address the disproportionate rates of chronic homelessness among Indigenous people in Sioux Lookout, Ontario Aboriginal Housing Services partnered with the local municipality and district services board to build a 20-unit transitional housing development last year<sup>xiv</sup>. Targeted for Indigenous people experiencing homelessness, the program provides culturally-relevant supports and services (including counselling services and life-skills training) to help tenants achieve greater stability and ultimately transition into permanent housing.

Initial program results on both the individual and community levels have been significant, with local savings of up to \$300,000 due to a decrease in interactions with police and ambulance calls, along with additional decreased costs related to fewer hospital visits, social assistance costs and emergency



shelter use<sup>xv</sup>. The Chief Administrative Officer of the district services board estimated that the program would pay for itself within five years<sup>xvi</sup>. As with the UIHB program, the Sioux Lookout program also provides residents with culturally-relevant and safe housing and relevant supports, creating opportunities to address intergenerational colonial trauma and reunite families separated by the foster care system.

For additional examples of innovation in the housing sector, we encourage you to look at ONPHA's [Innovations in Housing Stability projects](#), which profiles eight unique initiatives that have helped low- and moderate-income Ontarians find and keep a home that meets their diverse needs, including Indigenous families, seniors, women leaving violence, people experiencing homelessness and people experiencing mental health and addiction challenges.

## **5. COVID-19 – Building resiliency in the supportive housing system**

### *5.1. What has been the impact of COVID-19 on supportive housing in your community?*

Throughout the COVID-19 crisis, we have witnessed the susceptibility of individuals in congregate living environments to communicable diseases and the extreme risks for people experiencing homelessness, with disproportionate impacts seen among Black, Indigenous and other racialized communities, 2SLGBTQQA+ people, low/limited-income people, people with disabilities and seniors. While some providers with congregate living settings have been able to make alterations to their spaces to implement safety measures (e.g., facilitating physical distancing, creating isolation rooms for tenants experiencing COVID-19 symptoms, etc.), this came with significant costs, as well as a considerable lack of clarity related to public health directives.

Many providers are also facing cumulative rental arrears, increased costs related to unit vacancies, personal protective equipment (PPE), increased staffing, cleaning and security, backlogs of maintenance and repair work and skyrocketing insurance premiums, which will continue destabilizing the sector beyond the immediate crisis. While ONPHA and our members were pleased to see three rounds of dedicated funding available for providers through the Social Services Relief Fund, several providers reported that the funding was not sufficient to meet their rapidly increasing costs, and in some cases, providers did not receive any funding at all (as Service Managers directed the majority of funding toward emergency shelter and homelessness support systems). 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 as we enter the second wave of the pandemic and look forward for long-term planning.



Meanwhile, tenants continue to face uncertainty as income supports expire and/or fail to meet their basic needs, while employment opportunities in many sectors remain scarce and/or inaccessible to tenants with complex needs. Many providers also reported a significant increase in mental health and wellness issues among tenants as a result of social isolation, increased levels of stress and anxiety and limited/no access to social, health and community supports. While some providers have been able to respond to emerging tenant needs, others continue to face challenges and barriers in providing and/or connecting tenants to appropriate services and supports due to pandemic-related closures and programming restrictions.

### *5.2. How can the province continue to help organizations mitigate the impacts of COVID-19 on supportive housing to provide for the safety and well-being of staff and clients?*

Since the onset of COVID-19, ONPHA has developed and shared a number of advocacy positions with the Province, highlighting the need for investment in the housing sector as a critical component of economic recovery planning, as well as to safeguard the health and wellbeing of our communities for the long-term. Through our [joint advocacy](#) with the Cooperative Housing Federation of Canada and the Federation of Rental Housing Providers of Ontario, as well as our [Fall 2020 Budget Consultations Submission](#) and our submissions to the Standing Committee on Finance and Economic Affairs related to [municipalities, construction and building](#) and [small and medium enterprises](#), we have consistently called for the prioritization of investments and policies that ensure an equitable, sustainable housing system for all Ontarians. Our key recommendations for the Province include:

- Direct immediate stabilization funding to community housing providers to address the current crisis and ensure long-term sustainability and growth
- Protect the existing supply of community housing to avoid further losses and preserve affordability
- Prioritize investment in the community housing sector to meet the growing housing needs across the province and provide affordability for future generations
- Commit to an Urban and Rural Indigenous Housing Plan for Ontario to address the increasing housing needs of off-reserve Indigenous populations by working in partnership with the Indigenous community housing sector and ONPHA to implement the Plan
- Invest in an integrated approach to supportive housing in Ontario to meet the diverse housing needs of communities requiring supports
- Target an arrears management and/or rent relief program for unemployed and low-earning tenants, prioritizing high-risk, marginalized communities, to mitigate cascading impacts of rental arrears



In addition, it is critical that timelines for disbursement and access to guidance materials are improved and expedited for supportive housing providers. This would ensure that providers are able to safely manage the complexities of navigating COVID-19 in congregate living environments, while also relieving pressure from individual providers to develop their own policies and responses.

In a similar vein, housing providers require direct and consistent access to public health advice, training and education to build capacity and effectively respond to immediate challenges. This would also serve to support the development of service standards, guidelines and training to build long-term capacity in the system and ultimately improve program outcomes.

To improve supportive housing, as well as the broad community housing system, and help mitigate the immediate and long-term impacts of COVID-19 and other challenges, there is significant need for a comprehensive database that accurately represents the system across Ontario. Currently we do not have fulsome data related to the number of units, buildings, tenants and staff in the system; the current state of repair of assets; the value of assets; and importantly, the gaps in the system, including for Indigenous, Black and other racialized people, 2SLGBTQQIA+ people, seniors and people with a diverse range of disabilities and support needs.

With accurate and reliable data, the sector could more effectively measure and assess current service levels and the impacts of investments, leading to improved outcomes and efficiencies across the system. Building a comprehensive data system for the community housing sector is a key goal for ONPHA, and we look forward to opportunities to partner with the government to begin this critical process.

## **6. Program Models – Bringing models of care towards current best practice**

*6.1.b. Do you have any additional thoughts on how the government could encourage modernization of former domiciliary hostels in all communities?*

This could be achieved through the creation of an innovation funding stream for supportive housing providers that facilitates testing of new models, evaluation and reporting to support sharing of best and next practices to implement across the sector. As outlined above, any investments toward innovation must flow actively and consistently to ensure innovation is not stifled.

Since the implementation of the Community Homelessness Prevention Initiative (CHPI), one of the most significant challenges facing communities in modernizing the system has been access to



supports to explore innovative approaches to redesigning systems. It would be helpful to profile approaches taken in communities across the province to modernize the former domiciliary hostels.

## **7. Feedback on Current MMAH Supportive Housing and Homelessness Programs**

*7.1. How can the existing suite of supportive housing programs funded by MMAH (i.e., Home for Good, Indigenous Supportive Housing Program and Community Homelessness Prevention Initiative) be improved to be more efficient and reduce any overlap?*

Following the feedback and recommendations shared above around the need for a coordinated, integrated system, one approach could include the integration of the current suite of supportive housing programs into one single program. Using the principles currently underscoring the Community Homelessness Prevention Initiative (CHPI) – especially with respect to local flexibility that allows for local decision-making – a united approach would help improve efficiencies and reduce overlap, while creating opportunities for coordination and innovation within program areas and targeted outcomes.

However, it would be critical for government to undertake thorough and meaningful engagement and consultation with impacted communities in order to take this approach. As outlined above, government would especially need to enter into true partnership with Indigenous organizations and communities to determine whether this approach would be appropriate and/or relevant for Indigenous individuals and communities requiring supports, or whether a targeted Indigenous supportive housing program completely under the control of Indigenous-led organizations (with capacity and supports to provide a diversity of culturally-relevant supports) would be more suitable.

In addition, a united approach would also require a robust accountability framework related to reporting requirements and outcomes, with respect to both funders, as well as impacted communities, to ensure the program was meeting individual and community needs.

*7.2. Are there gaps in the program designs of Home for Good, Indigenous Supportive Housing Program Indigenous and Community Homelessness Prevention Initiative that need to be filled to be more effective at achieving intended outcomes across supportive housing programs?*





As outlined in several sections above, it is critical for Indigenous housing providers, organizations and communities to have greater control, management, vision and direction in the broad community housing sector to develop approaches for and by Indigenous peoples. To do so, Indigenous housing providers must have access to adequate funding and supports that support capacity building, development and the provision of and/or connection to culturally-relevant supports and services. This necessarily must include a more expansive and inclusive definition of “Indigenous supportive housing” to provide recognition and support for Indigenous housing providers that serve a diversity of tenant support needs, while also facilitating cross-sector partnerships.

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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: Office of the Auditor General. (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> See: Mental Health and Addictions Leadership Advisory Council. (2017). Supportive Housing Working Group Report: A Supportive Housing Strategy for Mental Health and Addictions in Ontario.

<sup>iii</sup> See: Government of Ontario. (2019). 2019 Budget: Protecting what matters most. Available at: <https://budget.ontario.ca/pdf/2019/2019-ontario-budget-en.pdf>

<sup>iv</sup> Data retrieved from the 2018 report by the Ontario Developmental Services Housing Task Force, Generating Ideas and Enabling Action: Addressing the Housing Crisis Confronting Ontario Adults with Developmental Disabilities.

<sup>v</sup> See: Office of the Auditor General of Ontario. (2016). Annual Report 2016. Queens Printer for Ontario.

<sup>vi</sup> Ontario’s Mental Health and Addictions Leadership Advisory Council has recommended that 30,000 supportive housing units be added over the next 10 years. This call has been supported and endorsed by many leading mental health organizations as the minimum requirement.

<sup>vii</sup> See: Lowrie, M. and Malone, K.G. The Canadian Press. (2020). Joyce Echaquan's death highlights systemic racism in health care, experts say. Available at: <https://nationalpost.com/pmnews-pmn/canada-news-pmn/joyce-echaquans-death-highlights-systemic-racism-in-health-care-experts-say>

<sup>viii</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>ix</sup> See: Ontario Non-Profit Housing Association. (2020). Urban and Rural Indigenous Housing Plan for Ontario. Available at: [https://onpha.on.ca/Content/Advocacy\\_and\\_research/Advocacy/Indigenous\\_Housing\\_Plan/Indigenous\\_Housing\\_Plan.aspx](https://onpha.on.ca/Content/Advocacy_and_research/Advocacy/Indigenous_Housing_Plan/Indigenous_Housing_Plan.aspx)

<sup>x</sup> See: Addictions and Mental Health Ontario. (2017). Where change happens: Addictions and mental health 2018 priorities. Available at: <https://amho.ca/wp-content/uploads/AMHO-Where-Change-Happens-2018-Priorities.pdf>

<sup>xi</sup> See: Ontario Federation of Indigenous Friendship Centres. (2019). Connecting for the dream: Urban Indigenous Homeward Bound program evaluation. Retrieved from: <http://www.ontarioaboriginalhousing.ca/wp-content/uploads/2019/09/UIHB-Evaluation-Final-Report.pdf>

<sup>xii</sup> See: Ontario Federation of Indigenous Friendship Centres. (2019).

<sup>xiii</sup> See: Blum, S. (2015). WoodGreen’s homeward bound: Social return on Investment (SROI). Presented at 2015 CHRA congress, Winnipeg, MN.

<sup>xiv</sup> See: Thompson, J. (2019, June 2). An Ontario mayor has linked his town’s issues to colonialism. Will it make a difference? Available at: <https://www.tv.org/article/an-ontario-mayor-has-linked-his-towns-issues-to-colonialism-will-it-make-a-difference>



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<sup>xv</sup> See: Thompson (2019).

<sup>xvi</sup> See: Thompson (2019).