

Ministry of Municipal Affairs and Housing  
Housing Programs Branch  
Proposal Number: 22-MMAH010

April 29<sup>th</sup>, 2022

## **Subject: ONPHA's submission to the 2022 Ontario Consultation on Access to Provincial Financing for Not-for-Profit Housing Providers**

Founded over 30 years ago, the Ontario Non-Profit Housing Association (ONPHA) is a member funded and directed association that represents nearly 700 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>i</sup>.

### **The role of non-profit supply to ensure housing affordability across the continuum**

According to the 2016 Census, 33% of renters in Ontario were in core housing need, compared to 8% of owners<sup>ii</sup>.

While the housing affordability crisis and COVID-19 have disproportionately impacted low/limited-income households, the effects have also rippled upward, posing financial challenges for medium-income households in the home ownership market. With down payments and mortgage payments increasingly out of reach, more medium-income individuals and families are looking toward options in the rental market, or delaying/abandoning homeownership altogether and prolonging their stay in the rental market. With a provincial vacancy rate of 2.0 and an average unit cost of \$1,277/month<sup>iii</sup>, few options are available and those with higher incomes are more likely to secure housing, further threatening affordability and increasing precarity for low and limited-income households.

ONPHA strongly supports the goal of Ontario's Housing Supply Action Plan to increase the supply of the full range of housing options across the province. In order to meet the needs of those most impacted by the housing crisis (e.g., low/limited-income households, racialized, and other marginalized communities), sufficient funding must be invested along the entire housing continuum, including for deeply affordable rental options.

### **Overview: Current and growing needs**

According to the recent Auditor General report, as of December 2020, 211,419 households were on waitlists for social housing in Ontario, with wait times ranging up to 12 years<sup>iv</sup>. Within the next ten years, ONPHA and the Cooperative Housing Federation of Canada's [Affordable Housing Plan for Ontario](#) shows the need to:

- Build at least 99,000 new affordable rental and supportive housing units
- Repair 260,000 community housing units
- Provide income support to 311,000 households



We recognize that as a result of the compounding, disproportionate impacts of COVID-19 and pre-existing affordability challenges on low-income, racialized, and other marginalized communities, the demand for deeply affordable housing and adequate supports has likely grown significantly.

There also remains a considerable gap in meeting the needs of the roughly 85% of Indigenous households living off-reserve<sup>v</sup> in the absence of a strategy for urban, rural, and northern Indigenous communities. As part of the overall need for 99,000 units, ONPHA's [Urban and Rural Indigenous Housing Plan for Ontario](#) identifies the need for an Indigenous-led approach to build at least 22,000 additional Indigenous-owned and operated subsidized units over the next 10 years, with adequate cultural supports.

By investing in the growth and sustainability of community housing, the government can deliver both short and long-term gains as part of Ontario's socioeconomic recovery. With adequate, affordable housing, people have better health outcomes, higher propensities to spend, and rely less on other costly public sectors such as healthcare, justice, shelter, and social assistance.

### Summary of recommendations

ONPHA calls on the Ministry of Municipal Affairs and Housing to consider the following recommendations:

- 1) **Support new supply and renewal of deeply affordable not-profit housing through robust investments and an expanded toolkit of policies to support community housing development, including:**
  - a) **Dedicated surplus land to non-profit development;**
  - b) **Upfront project funding and pre-construction financing for development in the community housing sector;**
  - c) **A comprehensive provincial incentives program; and**
  - d) **Redefining “affordable housing” to mean homes that are truly affordable to Ontarians;**
- 2) **Facilitate community-based acquisition strategies to protect aging rental stock and ensure that rental housing addresses deep core housing need for low-income Ontarians over the long-term;**
- 3) **Strengthen key development funding and financing programs by prioritizing and investing in community housing;**
- 4) **Support an Indigenous-led approach to urban, rural, and northern Indigenous housing;**
- 5) **Invest in an integrated approach to supportive housing; and**
- 6) **Offer flexible, responsive options for community housing providers under the new regulatory framework.**



Our comments below are organized according to the questions posed. Alongside our recommendations, ONPHA echoes the recommendations of our colleagues in the non-profit sector, including the submissions of the Ontario Nonprofit Network (ONN) and key partners in the delivery and protection of deeply affordable non-profit housing including the Housing Services Corporation (HSC) Association of Municipalities of Ontario (AMO), and Ontario Municipal Social Services Association (OMSSA). The following should be interpreted as complementing their submissions rather than conflicting in any way.

## **Questions**

### ***1. Could easier or less costly access to lending increase the supply of not-for-profit housing?***

Yes, easier, less costly, and more flexible access to lending would increase the supply of nonprofit housing, alongside robust capital investments in community housing development and renewal.

#### **Supporting new supply of deeply affordable not-profit housing**

Non-profit and co-operative housing providers have traditionally built over 90% of Ontario's below-market rental housing<sup>vi</sup> and provide good-quality affordable housing in perpetuity. While Ontario is home to nearly half of all community housing units in the country, the sector only represents approximately 5% of the provincial housing market<sup>vii</sup>.

Moreover, despite an increase in recent rental construction across Ontario<sup>viii</sup>, new developments are not meeting the needs of low-income households: for example, only 0.2% of new purpose-built rentals in the Greater Toronto Area are affordable for the lowest-income households<sup>ix</sup>.

In order to protect and grow the overall supply of deeply affordable housing that meets community needs, the community housing sector requires an expanded toolkit of programs and policy options designed to increase access to capital and equity, increase funding, and ensure access to greater amounts of surplus land. This toolkit should ensure robust capital investments in community housing and could also include land contributions, preferential financing rates, more flexible terms and loan guarantees, tax exemptions, development charge waivers, and community-based acquisition strategies.

Closely related, the community housing sector must be prioritized in the design and implementation of affordable housing supply programs and incentives. These programs have historically favoured private developers who can quickly provide "shovel-ready" projects, but this does not always translate into lasting investment. Affordable housing initiatives have typically capped rents for 20 years. After that, rents in privately-owned buildings often increase beyond the threshold of affordability for Canadians. When this happens, tenants are in crisis and communities are left scrambling for affordable alternatives.

On the other hand, the community housing sector is committed to providing affordable housing in perpetuity. With no built-in profit margin, every dollar invested in community housing goes directly toward keeping rents affordable and ensuring that public investment will be protected and leveraged to provide affordable housing options for future generations.



## Protecting and sustaining the existing supply of community housing

In addition to building new affordable rental units, it is critical to preserve existing stock, especially as needs continue to grow due to the compounding effects of COVID-19 and pre-existing affordability challenges. Between 2011 and 2016, it is estimated that for every one new affordable housing unit created across the country, fifteen existing affordable units were lost<sup>x</sup>. A community-based acquisition strategy would protect existing stock and ensure that rental housing remains responsive to affordability as well deep core housing need for low-income Ontarians.

Capital investment is required to maintain and protect Ontario's existing stock of 260,000 community housing units. As essential components of Ontario's housing supply and overall social and economic infrastructure, these homes are in need of new investment to serve future generations. Most of these homes were built between the 1960s and 1990s and require new investment for renewal, and importantly, to safeguard the significant public investment made into their development.

## ***2. What are the key barriers and gaps that prevent not-for-profit housing providers in accessing the capital financing needed to build and repair more housing (for example, through commercial and government loans or through capital financing and funding provided by federal and provincial programs)?***

- **Insufficient funding for community housing development**

Currently, affordable housing program design requires providers to shoulder upfront development costs, including the cost of land acquisition in an increasingly overheated real estate market, and pre-construction activities. Given legislative constraints and restricted revenue generation, community housing providers are often unable to provide this upfront capital, so private developers are largely favoured within these programs.

While ONPHA and our members strongly support and recognize the need for partnerships between the public, private, and community sectors, the community housing sector should also be encouraged and supported to build new affordable housing through the provision of upfront project development funding, which would help get more projects off the ground while ensuring long-term affordability for generations to come.

- **Capital financing and funding program design**

We have seen the success of projects funded through National Housing Strategy (NHS) programs like the Canada-Ontario Community Housing Initiative (COCHI) and Ontario Priorities Housing Initiative (OPHI) provide sustainability, growth, repair, and renewal along the housing continuum. By increasing investment in these programs in partnership with the federal government, the provincial government can ensure an appropriate mix of affordable and adequate housing is built and maintained to meet growing community needs.

However, other high-demand NHS programs, such as the National Housing Co-investment Fund (NHCIF), have presented significant barriers for community housing providers. We understand that



improvements have been made to the application process and design, and strongly support the new permanent funding increases, including dedicated funding for Black-led organizations and households. Nevertheless, providers continue to face challenges related to financial restrictions, administrative burdens, and prohibitive construction requirements. We have also heard directly from members approved for NHCIF funding that long timelines for disbursement are impacting projects on the ground.

While a welcome investment, new funding through consecutive rounds of the Rapid Housing Initiative (RHI) has posed similar challenges for community housing providers, particularly related to meeting short application and development timelines, as well as limited overall funding available to providers.

The availability of development financing presents an additional challenge for the not-for-profit sector, in that the 30-40 terms available from lenders (e.g. Infrastructure Ontario, Housing Investment Corporation) and high loan amounts are out of sync with the funding environment that decouples capital funding from operating dollars. The current environment fails to meet the needs of providers, including many smaller and medium-sized providers across Ontario, who are seeking smaller loans for renewal and/or partnership projects as well as shorter terms to align with the new framework for community housing (described in more detail in question 3.)

### ***3. Do the issues around access to financing differ for not-for-profit development of affordable rental housing compared to home ownership or other types of development? Are they different for private sources of financing (e.g., commercial lending) compared to government sources?***

- **Capital costs**

Unlike private operators, community housing providers cannot raise rents to fund repairs and still fulfill their mandates to provide affordable housing. The average cost per unit to bring these homes to a state of good repair (\$10,000 per unit)<sup>xi</sup> is significantly lower than estimated replacement costs of \$65 billion<sup>xii</sup>. This underscores the importance of funding and financing that supports not only new development but renewal projects, which are limited in scope. Moreover, these repairs would provide an opportunity to undertake accessibility retrofits and improve energy efficiency, creating jobs and helping to lower operating costs in the future.

Closely related to this, the community housing sector also requires a dedicated bulk utility rate to assist in offsetting the high electricity costs associated with the sector's aging, often electrically heated buildings. Find more on this recommendation in ONPHA's [submission](#) to the Ministry of Energy's review of Ontario's long-term energy planning framework.

- **Funding model**

At the same time, many community housing providers are facing challenges and uncertainty related to the end of their operating agreements and mortgages. 55% of ONPHA's membership will be affected by the end of provincial mortgages within the next ten years that has been projected to put 60,000 subsidized units at eventual risk of loss or falling into serious disrepair<sup>xiii</sup>. On March 30, Ontario



released the long-awaited regulatory changes under the *Housing Services Act, 2011* (HSA) related to [service and exit agreements](#) and [service levels, access, and income and asset limits](#). Overall, ONPHA is pleased with the new framework which incorporates many of our [recommendations](#) and sets the stage to ensure the long-term sustainability of the community housing sector. The new system shifts away from the current outdated, prescribed benchmark approach that presented significant challenges for the sector. Instead, it introduces a simplified, customizable approach, while providing important guardrails to protect and grow capacity across the province.

That said, the details of individual funding arrangements are not yet established, including overall subsidies to providers, the length of operating agreements and the funding available to maintain stock in a state of good repair. With this in mind, providers reaching the end of mortgages cannot effectively and strategically plan for the future of their portfolios, severely compromising housing affordability across the province.

In addition to the need for long-term guaranteed ongoing operating funding tied to capital investments, there is a gap in financing available for housing providers to facilitate both renewal and development projects, including pre-development work. Non-profit providers need access to loans with shorter terms, lower interest rates and lower principal amounts that are currently not available or not accessible at reasonable interest rates through traditional financing from Infrastructure Ontario and housing-specific lenders such as the Housing Services Corporation.

Moreover, while investments in community housing reflect sustainable, long-term returns on public investment for public dollars, the perceived risk of developing non-profit housing projects puts non-profit developers at a significant disadvantage in relation to both public and private lenders. This underscores the importance of a developing a risk investment framework that recognizes and responds to the unique characteristics of community housing (e.g. significant equity in built assets), a recommendation that is explored in greater depth by our colleagues at the ONN.

#### ***4. What role could government play in addressing those barriers? Is there an opportunity for various levels of government to work together to address barriers?***

- **Redesign existing development funding and financing programs**

To facilitate greater renewal and development opportunities for non-profit housing providers (and resulting deep affordability across the country), we call on your government to further strengthen key funding programs by prioritizing and investing in community housing, which could include:

- Increasing funding for COCHI and OPHI in partnership with the federal government to ensure an appropriate mix of affordable and adequate housing;
- Calling on the federal government to:
  - reform the NHCIF to further increase funding, create flexible guidelines, and ensure application processes and funding disbursements occur in a timely manner;
  - make the RHI a permanent funding stream to ensure adequate support and funding for providers to achieve a state of readiness and grow affordable housing options;



- Prioritize non-profit housing providers as preferred municipal partners under the committed Housing Accelerator Fund (see more in the Canadian Housing and Renewal Association's [letter](#) on the proposed fund); and
  - Dedicate programs for access to surplus federal land (e.g. through the Federal Lands Initiative) to non-profits for the development of deeply affordable housing options; and
  - Working with the non-profit sector to explore more workable financing options through IO and other lending bodies which could include preferential interest rates, shorter term loans options and loan guarantees to reduce perceived risk for private investment partners.
- **Expand access to dedicated non-profit capital funding**

Exploring the creation of a dedicated non-profit development fund to facilitate and encourage the construction of deeply affordable housing options, including through:

- pre-construction financing;
- prioritization for community-based acquisitions strategies; and
- access to surplus land through the forthcoming strategies developed through the new provincial Centre of Realty Excellence.

- **Support an Indigenous-led approach to urban, rural, and northern Indigenous housing**

ONPHA was pleased to see Ontario's recent announcement of \$10 million in new annual funding for Indigenous-led housing and supports. With a commitment at the federal level to co-develop an urban, rural, and northern Indigenous housing strategy<sup>xiv</sup>, Ontario should call upon its federal counterparts to follow through on a national approach, with dedicated funding for off-reserve Indigenous housing, in addition to supporting Indigenous-led solutions in Ontario with dedicated, sustainable investments that meet demonstrated community needs.

- **Invest in an integrated approach to supportive housing**

Currently, Ontario has less than half of the supportive housing units required for mental health and addictions alone, not including persons with other disabilities nor the growing needs related to COVID-19. Waitlists range up to seven years and a minimum of 30,000 new supportive housing units are required to meet this need<sup>xv</sup>. Beyond supporting individuals, consumer choice and community integration would help end chronic homelessness and achieve major cost savings across health, justice, social services, and shelter systems.

- **Offer flexible, responsive options for community housing providers**

As noted above, community housing providers reaching the end of their operating agreements and mortgages require clear parameters and sustainable, predictable funding to effectively and strategically plan for the future, while ensuring they can continue to provide safe, quality, affordable housing. Additional guidance to service managers *Protecting Tenants and Strengthening Community Housing Act, 2020* must 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.



## **5. How could the government prioritize its financial assistance to not-for-profit housing providers**

- **Support community-based acquisitions strategies**

Due to the impacts of COVID-19, residential and commercial buildings in financial distress are increasingly becoming available. This presents an opportunity to quickly grow affordable housing stock through community-based acquisitions strategies that prioritize non-profit housing providers. Not only would this increase affordable housing options for low/limited-income and other marginalized communities during an ongoing housing, health, and economic crisis, but it would also help ensure households remain connected to vital resources, services, and community.

- **Dedicate surplus land to non-profit development**

Closely related to this, we also call on the government to make greater amounts of surplus land available to the community housing sector (e.g. through the forthcoming strategies of Ontario's new Centre of Realty Excellence). Prioritizing non-profit housing in these strategies will ensure every dollar invested goes directly toward keeping rents affordable in perpetuity, thus protecting and leveraging public dollars to provide affordable housing for future generations.

- **Provide upfront project funding for development in the community housing sector**

As noted above, community housing providers and non-profit developers face significant cost barriers to development. This prevents them from undertaking projects and has often disadvantaged them from participating in affordable housing initiatives that favour shovel-ready projects.

To address this, we encourage the provincial government to support development in this sector through providing upfront project funding which could help get projects up and running. We also encourage the province to design any forthcoming affordable housing initiatives and incentives to prioritize non-profit developers.

- **Develop and invest in a comprehensive provincial incentives program**

Achieving an adequate supply of affordable housing will require a comprehensive system of provincial incentives, a significant portion of which should be targeted towards creating and repairing community housing.

As noted above, these incentives could be funded, in part, through reinvesting a significant portion of housing related provincial revenues back into housing affordability initiatives to build the deeply affordable housing Ontario needs, including revenues generated through the Land Transfer Tax and vacant homes taxes implemented at the municipal level.

- **Redefine "affordable housing" to mean homes that are truly affordable to Ontarians**

Addressing Ontario's housing crisis also requires creating rental housing that is affordable to people living below median-income levels and ensuring that definitions of affordability are income-based, reflective of local jurisdictions, and within reach of low-income households.





Current definitions of affordable housing, such as rental units at 80-100% of average market rent, are inadequate to address the needs of a growing number of low-income families that are already struggling to pay rent that is between 30%-50% of their household income<sup>xvi</sup>.

**6. For not-for-profit developers: does your not-for-profit organization have long-term financing need for capital expenditure?**

*If yes, then:*

- a. Does your organization have surplus cash flows to service loan repayment?*
- b. Does your organization have a third-party entity, such as a municipal government, that can provide a financial guarantee?*

N/A

**7. Do you have other suggestions for ways to improve non-profits housing providers' ability to build and repair more housing?**

- **Ensure housing dollars stay in the housing system**

To grow and sustain the community housing sector and support households in need, housing-related revenues should be reallocated to the growth and preservation of deeply affordable housing. Retaining housing related tax revenues within the housing sector is critical to ensuring the system's sustainability and managing the long-term affordability of housing for all Ontarians over time. Directing these revenues toward affordable housing would present an enormous opportunity to help ensure that affordability challenges do not worsen as the housing market continues to heat up, providing an economic catalyst for housing affordability.

For example, in the 2021 Ontario Economic Outlook and Fiscal Review, the Land Transfer Tax was projected to draw in revenues of up to \$5.049 billion in 2021-22 (a 37% increase over the previous year)<sup>xvii</sup>. If this was redirected, even in part, to affordable housing development, it would go a long way to easing the pressure on the rental market and help level the playing field for low- and middle-income Ontarians, while ensuring housing dollars stay in the housing system.

Similarly, it is critical that existing levels of public investment in the housing system are maintained for long-term sustainability and not diverted to other priorities. At the provincial level, the government should continue to fund all ministries responsible for housing (i.e., Municipal Affairs and Housing, Health, and Children, Community and Social Services), while promoting stronger, synergistic approaches to break down silos between ministries, increase access to housing and supports, and ensure greater value for housing-related dollars.

At the local level, the provincial government, in partnership with the federal government, must support municipal budgets and safeguard 10-year Housing and Homelessness Plans to ensure funding for critical housing solutions is not redirected to other competing pressures. We understand the critical



need for municipal financial stability, especially in light of municipalities' inability to run deficit budgets, increased demand for services, and the ongoing impacts of significant social and economic restrictions into 2022; however, we firmly believe that funding for housing must remain within the housing system and that it must never be at risk of diversion to alternate priorities.

Finally, ONPHA strongly supports any and all efforts to curtail the escalation of housing costs beyond the means of Ontarians. We applaud the government's efforts to preserve affordability in the housing market and protect homebuyers and renters through various means, including the exploration of best practices with municipalities around a vacant home tax. We would encourage this discussion to include the voices of non-profits and to highlight the importance of earmarking this revenue for long-term funding of deeply affordable housing across Ontario municipalities. However, we continue to stress that, to combat the housing crisis and ensure long-term affordability for Ontarians, it is vitally important to ensure new investment and the provision of surplus land to the community housing sector, along with community-based acquisition strategies to increase and protect the stock of non-market housing.

- **Work with municipalities to identify, review, and assess regulatory requirements driving current development approval processes**

Recognizing the importance of the Ontario government's increased focus on fast-tracking new supply of housing across the province, processing time for approvals is only one component of the costs and timelines associated with development. Balancing competing interests and streamlining development processes will be very complex and require substantial municipal input. We urge the provincial government to work closely with municipalities to review regulatory requirements to find potential efficiencies and commit to modifying or amending these requirements depending on the outcome of this process.

Municipalities should be empowered to create programs that promote the development of deeply affordable rental housing through the provision of incentives, including the waiving of development fees, fast-tracking of development approvals, and land donations. The design of such programs must support the development of as many units as possible, while ensuring they are deeply affordable to meet community needs.

- **Prioritize supportive levers for new community housing development**

Exempting or reducing costs for non-profit and co-op housing providers (e.g., development charges, property taxes, etc.) could help to lower the cost of building new deeply affordable housing.

The government could also broaden the application of inclusionary zoning to more communities across the province and encourage municipal governments to enact inclusionary zoning by-laws.

- **Promote collaboration between all housing sector partners**

ONPHA is pleased to see the government moving ahead with initiatives to address the critical, complex, and urgent issue of Ontario's housing affordability crisis, including through the Housing Affordability Task Force, the Provincial-Municipal Housing Summit and the Rural Housing Affordability Roundtable, and regulatory development as part of the Community Housing Renewal Strategy.



We call on the Ontario government to include the voice of community housing in the Housing Supply Working Group to achieve our shared vision of meeting the diverse, growing needs across the province. It is critical that all housing sector partners are at the table in ongoing and involved in discussions to address the housing affordability crisis and develop solutions that meet needs along the housing continuum, including deeply affordable rental options. This must include ongoing, strong partnerships between municipal, provincial, federal, and Indigenous governments and leaders, the private sector, and the community housing sector.

The Province has an important role to continue playing as a regulator, enabler, and funder for the community housing system, which must include ongoing coordination across all related systems (e.g., health, homelessness, social assistance, justice, etc.) and alignment of existing policy instruments (e.g., 10-year Housing and Homelessness Plans) with asset management practices (e.g., capital planning requirements over the course of a building's life cycle of 30 – 40 years) to maintain and grow the community housing sector over the long-term.

Thank you for taking the time to review our submission. ONPHA looks forward to ongoing engagement with the Province of Ontario to develop sustainable, equitable community solutions to support Ontario's socioeconomic recovery by opening more doors through housing.

- <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)
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- iv Office of the Auditor General of Ontario. (December 2021). Value-for-Money Audit: Homelessness (2021). Available at: [https://www.auditor.on.ca/en/content/annualreports/arreports/en21/AR\\_Homelessness\\_en21.pdf](https://www.auditor.on.ca/en/content/annualreports/arreports/en21/AR_Homelessness_en21.pdf)
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- vi Office of the Auditor General of Ontario. (December 2017). Annual Report 2017. 3.14 Social and Affordable Housing. Available at: [https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1\\_314en17.pdf](https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1_314en17.pdf)
- vii There are approximately 260,000 community housing units in Ontario, and 5,169,175 total dwellings in Ontario as of 2016. See: Canadian Housing and Renewal Association. (September 2018). Affordable Housing Budget Expenditure Highlights in Canada. Available at: [https://chra-achru.ca/wp-content/uploads/2018/09/2018\\_pt\\_budget\\_scan\\_final.pdf](https://chra-achru.ca/wp-content/uploads/2018/09/2018_pt_budget_scan_final.pdf); Statistics Canada, 2016 Census of Population, Statistics Canada Catalogue no. 98-400-X2016222.
- viii Canada Mortgage and Housing Corporation. (December 2021). Starts and Completions by Intended Market (Canada, provinces). Available at: <https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-data/data-tables/housing-market-data/starts-completions-intended-market-canada-provinces>
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- x Pomeroy, S. (May 2020). Why Canada needs a non-market rental acquisition strategy. Available at: [https://www.focus-consult.com/why-canada-needs-a-non-market-rental-acquisition-strategy/#\\_ftn1](https://www.focus-consult.com/why-canada-needs-a-non-market-rental-acquisition-strategy/#_ftn1)
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- xiv Prime Minister of Canada. (December 2021). Minister of Housing and Diversity and Inclusion Mandate Letter. Available at: <https://pm.gc.ca/en/mandate-letters/2021/12/16/minister-housing-and-diversity-and-inclusion-mandate-letter>
- xv 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>xvi</sup> United Way Greater Toronto. (January 2022). Open Letter in advance of the provincial-municipal housing summit on January 19, 2022. Available at: [https://www.unitedwaygt.org/special-statements/open-letter-in-advance-of-the-provincial-municipal-housing-summit/?utm\\_campaign=2022-homelessness-summit&utm\\_source=package&utm\\_content=partners&utm\\_medium=email](https://www.unitedwaygt.org/special-statements/open-letter-in-advance-of-the-provincial-municipal-housing-summit/?utm_campaign=2022-homelessness-summit&utm_source=package&utm_content=partners&utm_medium=email)
- xvii Ministry of Finance. (November 2021). 2021 Ontario Economic Outlook and Fiscal Review: Build Ontario. Available at: <https://budget.ontario.ca/2021/fallstatement/index.html>