

focusON

Making ends meet: Opportunities and challenges of rental assistance programs



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The Ontario Non-Profit Housing Association (ONPHA) represents 740 non-profit housing providers in 220 communities across Ontario. ONPHA members operate more than 160,000 non-profit housing units and provide housing for approximately 400,000 people including seniors, low-income families with children, Aboriginal people, the working poor, victims of violence and abuse, people living with developmental disabilities, mental illness, HIV/AIDS or addictions, and the formerly homeless/hard-to-house.

ONPHA's **focus ON** series examines key issues facing Ontario's affordable housing sector, presenting a variety of perspectives to encourage thoughtful and reflective discussion on the development of sound housing policy and the future of the community-based housing sector in Ontario.

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Executive Summary

Ontario is facing an affordable housing crisis. Our rate of rental housing production continues to lag behind other provinces, while between 60,000 and 80,000 low-income rental households are added to the province each decade. Demand for homes that families can afford is consistently outpacing supply, with one in five tenant households stuck in core housing need for more than three years.

In this environment, policies that promote demand-side solutions to the problem of housing affordability have gained prominence. Rental subsidy programs, which seek to increase low-income households' ability to afford average rents, offer a way for households to access units in their community that were previously out of reach. Unlike social housing programs of the past, rental subsidy programs primarily support tenants by helping them to rent units owned by private sector landlords.

While other countries – particularly the United States – have a long history of rental subsidy programs, they have experienced an increase in popularity in Canada over the past decade. In Ontario, the federal, provincial, and municipal levels of government all fund some kind of rental subsidy initiative. With over 168,000 households on waiting lists for affordable housing, these programs can provide a swift, valuable response to the growing need for an affordable home.

But in the flurry to find a responsive solution to housing affordability challenges, the potential consequences of rental subsidy programs have often gone unexamined. Because rent subsidies do not increase the supply of affordable housing, they can put additional pressure on rental markets and even contribute to rent escalation. If not coupled with other policy initiatives, rental subsidy programs can group participating households in low-income areas that are isolated from important services, and may

¹ In rent-geared-to-income systems, households generally pay a rent based on 30 per cent of their gross income.

subject renters to landlord discrimination. For this reason, rental subsidy programs are best used in markets with high vacancy rates, where private landlords have more incentive to participate and are less likely to raise rents.

For the majority of households in housing need in Ontario, the primary challenge is affordability. Giving these households the ability to pay their rent each month and still have enough left over to put food on the table can go a long way towards increasing families' security and wellbeing. However, rental subsidy programs are only one part of the solution.

In order to increase housing affordability for all households in the long term, supply-side solutions are also necessary. Without government investment in new social and affordable rental housing, the number of Ontario families that cannot afford a home in their community will continue to rise. A balanced approach that capitalizes on the benefits of both supply and demand-side housing initiatives is the best way to ensure all Ontarians, regardless of income, have a safe and secure place to call home.

Introduction

Housing policy in Ontario has evolved significantly over the past 50 years. From the governmentfunded supply programs of the post-war era to the neo-liberal priorities of the 1990s, political interests, economic changes, and population shifts have all impacted the availability and demand for affordable rental housing. In the current political climate of fiscal restraint and evidence-driven policy, government investment in affordable housing is under increasing scrutiny to demonstrate value for every tax dollar spent – all while an increasing number of Ontarians are in need of a safe and secure place to call home.

From the 1950s to the 1990s, Canadian governments addressed the issue of housing affordability by investing in social housing projects that provided permanent housing on a rent-geared-to-income (RGI) basis¹ for low and moderate-income households. Governments also stimulated a private sector response by supporting new private rental development. But when the federal and Ontario governments withdrew from funding social housing construction in the 1990s, new ideas about how best to help residents achieve affordable homes emerged.

A recent focus on the costs of new construction and on the importance in client "choice" in social programs has manifested in a shift from supply-oriented housing initiatives to programs that target rental demand. These programs aim to increase housing affordability by providing low and moderate-income households with a rental subsidy, either directly or through their landlord. Rental subsidy programs are quite effective at providing immediate assistance to households in need. However, unlike the social housing projects of the past, they do not create an enduring public asset that can provide affordable housing in perpetuity.

¹ In rent-geared-to-income systems, households generally pay a rent based on 30 per cent of their gross income.

Current support for rental subsidy programs comes from both the federal and provincial governments, through initiatives like the Investment in Affordable Housing (IAH) program, and from service managers themselves, who are pioneering innovative programs to help households in their communities. While rental subsidy programs have a number of benefits for participating households, a closer examination of the impact of these programs is warranted. This focusON explores the balance between housing solutions that address supply versus demand, and how rental subsidy programs may influence the future of affordable housing in Ontario.

Affordable housing: Under the Province's Investment in Affordable Housing program, affordable housing refers to projects where average rents are set at or below 80% of the Average Market Rent (AMR) for the area, as measured by CMHC.

Core housing need: Occurs when households are living in housing that is too small for their family size, requires major repair, and/or exceeds 30 per cent of their household income – and cannot afford to rent a suitable alternative unit in their community.

Social housing: Either non-profit rental or co-operative housing funded by a legally-prescribed government program (although some social housing providers are now building housing with no government funding). Social housing in Ontario includes Local Housing Corporations (formerly known as Public Housing) where nearly all tenants pay on rent-geared-to-income scale, as well as community-sponsored non-profit housing projects, which contain a mix of market and rent-geared-to-income units.

Demand-side solutions

While governments can tackle housing affordability issues by increasing the supply of affordable rental units, they can also implement solutions that respond to existing demand for affordable housing. A brief overview of housing programs in Ontario and the continued need for affordable housing is outlined in Appendix A. Due to this growing need, experts have argued that relying on supply solutions alone is not feasible, and that some kind of immediate financial assistance is required in order to help low- and moderate-income households².

Rental subsidies: Government-funded programs that allow low- and moderate-income households to access rental housing in the private market at a reduced cost. In Canada, there are two main types of rental subsidy programs: rent supplement and housing allowance.

Rent supplement programs: Legal agreements between a private landlord and the program funder (either a level of government or non-profit organization). The agreements allow eligible households to pay rent based a percentage of their household income (usually 30 per cent), with the funder covering the difference between a unit's market rent and the amount that the household pays. In rent supplement programs, the rental subsidy flows directly to the landlord.

Housing allowance programs: The rental subsidy is paid directly to the household, with no landlord involvement. Housing allowances are portable, which means the household can move and take the subsidy to another unit if they wish. Some housing allowance programs cover the entire difference between 30 per cent of a household's income and the market rent of the unit; others are set at a fixed amount per month.

² Steve Pomeroy, "Towards a Comprehensive Affordable Housing Strategy for Canada," and Don Drummond, "A New Paradigm for Affordable Housing: An Economist's Perspective," in *Finding Room: Policy Options for a Canadian Rental Housing Strategy*, ed. J. David Hulchanski and Michael Shapcott (Centre for Urban and Community Studies, University of Toronto, 2004).

Demand solutions come in the form of rental subsidies, which in Ontario have manifested in two models: rent supplements and housing allowances. Housing allowances and rent supplements can be used to subsidize market rent units in non-profit and co-operative housing communities, as well as in units owned by private landlords. As non-profits and co-ops generally have lower average rents than private-sector units, and because the landlords have a commitment to long-term housing affordability³, this can be a valuable way for the government to support tenants and the social housing sector simultaneously⁴. However, a large number of current subsidies go to private-sector units, which in many areas have higher vacancies than non-profit and co-op housing buildings.

In this paper, we will focus primarily on rental subsidies that subsidize units in the private sector. These rental subsidies are a departure from traditional government investments in social and affordable housing and, as such, elicit questions about their impact on policy and communities. In the following sections, we attempt to understand the current rise in rental subsidy programs, as well as the effects they may have on participating households, landlords, and local rental markets.

³ Pomeroy, "Comprehensive Affordable Housing Strategy," p. 279; Wellesley Institute, Submission to the Province of Ontario, p.

⁴ The lower average market rents in non-profit and co-op housing units means that each dollar invested in the rental subsidy generates additional value for the government (compared to units with higher market rents).

Why are rent subsidy programs so popular?

In Ontario, rental subsidy programs have become much more prevalent in the past 10 years. The federal and provincial cost-shared Affordable Housing Program (AHP) and Investment in Affordable Housing program (IAH) contain rent supplement and housing allowance components, and the federal government committed to funding rent supplements as part of a national strategy to address homelessness through the At Home/Chez Soi project⁵. Rental subsidies are also used by the Ministries of Health and Long-Term Care (MOHLTC) and Community and Social Services (MCSS) to create supportive housing⁶.

At the same time, service managers are turning to rental subsidy programs to address their own housing needs. Recently, a number of areas – lead by the Region of Peel and Region of Halton – have begun developing their own rental assistance programs. Driven by both political support and public pressure, regions are increasingly investing in initiatives that reduce the lengthy wait times that households face for RGI housing⁷.

In the past, the entrenchment of long-term social housing programs meant that a steady supply of affordable housing was available. Politicians were under less pressure to provide immediate solutions, and were thus more willing to support social housing investment, even if it meant funding buildings that would not be finished until after they were out of office. When the long-term supply programs were scrapped, a shift towards election-cycle politics emerged. Governments must now be seen as responding quickly to housing needs, thus making subsidies that provide shelter immediately seem more effective than investing in long-term construction projects.

⁵ In 2008, the federal government invested \$110 million in the five-year research project, in an attempt to measure the effects of Housing First interventions on homelessness. In the At Home/Chez Soi project the majority of rent supplements went to private sector landlords that housed program participants.

⁶ Supportive housing in Ontario is non-profit housing for people who need support to live independently, such as the frail elderly, people with mental health problems, addictions or developmental disabilities. Administration and funding of supportive housing providers were not downloaded to the Service Managers in 2001; rather, the responsibilities were transferred to the provincial ministry that funded the support services, either the Ministry of Health/Long-Term Care or the Ministry of Community and Social Services.

⁷ The average wait time in Ontario in 2014 was 3.83 years. In the Region of Peel, the average wait time was 5.3 years; in the Region of Halton it was 4 years. ONPHA, 2015 Waiting Lists Survey (May 2015).

For regional and municipal governments, rental subsidy programs provide a swift response to the pressing housing needs of their constituents. While building new rental housing takes an average of three years⁸, rent supplement and housing allowance programs can be implemented and rolled out in less than a year. The effects of rental subsidies are immediate: both Halton and Peel have already experienced drops in their housing waiting list and average wait time since implementing their programs.

Another significant driver of rental subsidy programs is changing attitudes about government assistance and client agency. Through the success of initiatives like the At Home/Chez Soi project, the notion of client "choice" has gained prominence⁹. Increasing Ontarians' ability to choose their housing type and location is a key component of the "housing first" philosophy of treatment, which originated in New York City in the 1990s and has come to influence housing and homelessness policy around the world¹⁰.

Rent supplement and housing allowance programs that allow participants to rent in the private market generally provide greater choice than traditional social housing programs, which require households to relocate to a specific RGI unit. This emphasis on "choice" appears in the materials associated with a number of service managers' rental subsidy programs¹¹. While these programs do have eligibility requirements and restrictions regarding maximum rental amount, unit size (based on household composition) and built form, they still give households a larger range of housing options from which to choose.

⁸ Nick Falvo, "Addressing Canada's Lack of Affordable Housing," (Presented at Canada Economics Association Annual Meetings, June 2007): p. 13. However, the construction of new rental housing can take longer if financing has not been secured or if there are additional regulatory processes to navigate (e.g. zoning).

⁹ Michelle Patterson, The At Home/Chez Soi Project: Year Two Project Implementation at the Vancouver, B.C. Site, (Mental Health Commission of Canada, May 2012).

^{10 &}quot;A key principle of Housing First is Consumer Choice and Self-Determination. In other words, people should have some kind of choice as to what kind of housing they receive, and where it is located." "Housing First," The Homeless Hub website, accessed July 17, 2015: http://www.homelesshub.ca/solutions/housing-accommodation-and-supports/housing-first

¹¹ The Region of Peel's rental subsidy program, for example, is called Choice-Based Rental Options.

Do rental subsidy programs work for everyone?

Effective for independent households

With the current popularity of rental subsidy programs, it is important to consider how they may or may not work for certain populations. While a number of service managers report that at present, private sector landlords are willing to accept tenants with a rental subsidy, some have acknowledged that this arrangement can be harder to negotiate for program participants who may have barriers to housing¹². Rental subsidy programs appear to work well for independent, stable households – particularly seniors – who may not experience the stigma or barriers that other renters might face¹³. Because some rental subsidy programs are contingent on participants securing the support of private landlords themselves, these programs may be especially ill-suited for participants with complex needs¹⁴.

For Ontario households that receive rental subsidies for supportive housing, funding frequently flows through rent supplement agreements between a private landlord and a level of government or a non-profit agency. By placing the responsibility for negotiating rental agreements with the rent supplement administrator, these programs can reduce the discrimination that a tenant might face in the private rental market. To attract and retain private landlords, many supportive housing and housing first programs also employ trained staff to work with landlords¹⁵. While this can be a successful solution, it requires additional time and program resources.

¹² These barriers can be related to a tenant's support needs, such as a history of mental health and addictions challenges, as well as issues such a poor credit score or unreliable rental history.

¹³ There is evidence of this phenomenon with the Section 8 housing voucher program in the U.S. A 2001 study found that in large cities, only 69 per cent of program participants were able to find units that met the program requirements and had landlords willing to accept the voucher. Bruce Katz et al., "Rethinking Local Affordable Housing Strategies: Lessons from 70 Years of Policy and Practice," (The Brookings Institution Centre on Urban and Metropolitan Policy and The Urban Institute, December 2003): p. 24

¹⁴ In Toronto's Emergency Homelessness Pilot Project in 2002, program participants who were attempting to transition out of homelessness faced challenges finding landlords willing to rent to them, even with a supplement agreement. Falvo, "Lack of Affordable Housing," p. 17

¹⁵ ONPHA, FocusON: Housing First (May 2013): p. 16-17

That rental subsidy programs may work better for some populations than others does not negate their value. It is simply important to note that rental subsidy programs are not a "one size fits all" solution, and that a number of households on waiting lists may be better suited to living in traditional social or supportive housing communities. In this respect, one service manager noted that a key value of rental subsidy programs is that they remove the households that would prefer to live in the private market from the waiting list, which results in shorter wait times for households that might face barriers and would prefer to live in social or supportive housing.

Solutions for households fleeing domestic violence

In 2014, there were 3,932 households fleeing domestic violence on waiting lists for RGI housing in Ontario¹⁶. Even though the provincially-mandated Special Priority Policy gives these applicants priority on local housing waiting lists, they still faced an average wait of eight months across Ontario, and up to 18 months in certain municipalities¹⁷. For these households, programs that provide rental subsidies can be of tremendous value, due to their swift response and the freedom they provide. By helping participants to afford units in the private rental market, rental subsidy programs can greatly reduce the amount of time a vulnerable household remains in an unsafe living situation or emergency shelter¹⁸.

A recent study by the U.S. Department of Housing and Urban Development (HUD) demonstrates the advantages of rental subsidies for families that are homeless, many of whom have experienced domestic violence¹⁹. The most effective intervention for study participants was access to a permanent rental housing subsidy. The subsidy was provided through a housing allowance-like voucher, wherein households could access units on the private market and pay a rent based on 30 per cent of their income. This intervention "produced large and consistent effects across every measure of housing stability" as well as reducing households' exposure to domestic violence²⁰.

¹⁶ ONPHA, 2015 Waiting List Survey Report, p. 13

¹⁷ Ibid.

¹⁸ In an OAITH survey, 90 per cent of women surveyed reported that housing accessibility was a factor in their decision to stay or return to an abusive person. Ontario Association of Interval and Transition Homes, *Response to the Long-Term Affordable Housing Strategy Consultation* (December 2009): p. 6

¹⁹ Daniel Gubits et al., Family Options Study: Short-Term Impacts of Housing and Service Interventions for Homeless Families (U.S. Department of Housing and Urban Development, Office of Policy Development and Research, July 2015): Executive Summary.

²⁰ Ibid.

What offers better value for money – rent subsidies or capital programs?

Rental subsidies offer advantages in the short-term

Interest groups with differing priorities have long-debated whether demand or supply solutions are the most cost-effective approaches to housing affordability.

The rise in construction costs means that building new homes is expensive²¹. At the same time, development charges in the majority of Ontario municipalities have increased steadily since the implementation of the *Development Charges Act* in 1997²². While some Ontario municipalities waive development charges for new housing construction that meets affordability targets, this is not a universal practice. These increases, coupled with rising land costs in areas with high rental demand, all add up to large price tag: in Toronto, for example, the financing and building of a new, 190-unit affordable housing development is estimated to cost \$31.5 million²³.

With costs this high, some service managers feel that they can assist significantly more households through rental subsidies than by financing the construction of new social housing buildings, especially since rental revenues generated from social and affordable housing are comparably low. There is evidence to support this line of reasoning: over the first three years of the IAH Program, for example, over 7,000 households received rental subsidies, while only 1,694 new affordable rental units were created²⁴.

²¹ Ministry of Municipal Affairs and Housing, Municipal Finance Policy Branch, *Development Charges in Ontario: Consolation Document* (Queen's Printer for Ontario, Fall 2013): pg. 7

²² Ibid., p. 16

²³ Jill Black, The Financing and Economics of Affordable Housing Development (Research Paper 224: Cities Centre University of Toronto, September 2012): p. 24. This projection is in line with the costs associated with recent non-profit housing projects, such as the YMCA's Elm Centre, which created 300 subsidized units at a price tag of \$80 million (though the cost was somewhat mitigated through the use of government loans (City of Toronto and Infrastructure Ontario), credits and rebates, private grants, and a community housing bond. Source: MaRS Centre for Impact Investing and the Housing Services Corporation, Blended Financing for Impact: The Opportunity for Social Finance in Supportive Housing (March 2013): p. 23-24

²⁴ Ministry of Municipal Affairs and Housing, "Investment in Affordable Housing Program: Three Year Report (2014-2014)," (Accessed online on 21 July 2015): http://www.mah.gov.on.ca/Page10065.aspx

Which approach is better over time?

While rental subsidy programs can stretch government dollars to assist a larger number of households in the near future, it is less clear which approach provides the best value for money when factoring in long-term outcomes. Building new social housing is expensive and time-consuming, but it ensures the creation of an enduring public asset. The government and the public can count on this asset to provide affordable housing to low- and moderate-income households for an extended period of time. By contrast, in areas with low vacancy rates and rising rental costs, either the government must provide an ever-increasing amount of funding to assist the same number of households, or the number of households that can benefit from the subsidies will decline annually²⁵.

To illustrate the benefits that can be derived from either constructing new social housing or providing rental subsidies, one report calculated the value of a hypothetical one-time injection of \$100 million in new funding for housing affordability²⁶. It found that if the \$100 million was allocated entirely to rent supplement programs, the investment would be able to support approximately 17,000 clients for a single year in private housing. This allocation would thus fund 17,000 affordable household years²⁷. By contrast, if the government invested the funding into building new social housing, approximately 800 single-person households on social assistance would have affordable housing for 30 years²⁸. This allocation would thus fund 24,000 affordable household years²⁹. Investing in new social housing was deemed to be the more cost-effective approach.

It is important to note that the report's calculations included several assumptions, one of which was that all the rental subsidies provided were "deep," at \$500 per month, per household³⁰. Had the calculation included a mix of deep and shallow subsides, more households could be helped through the rent supplement program – increasing the overall total. However, the report's analysis reveals the difficulty in comparing the cost effectiveness between demand solutions and supply solutions for housing affordability. There are a number of factors that influence the costs associated with either type of program and may be hard to predict in advance, such as the exact depth of rental subsidies, as well as the grants or waived fees that can accompany new social and affordable housing development.

A public asset - benefit or cost?

While rental subsidy programs do not create an enduring public asset, this outcome can be interpreted as either a cost or a benefit of the approach. As one service manager noted, funding rental subsidy programs means that municipalities are not burdened with the millions of dollars' worth of capital liabilities and obligations that accompany social housing projects. Moreover, social housing buildings, many of which are over 30 years old, now require significant capital repair to remain viable. These efforts to restore and maintain housing projects are expensive, and the service manager is often left holding the bill with little assistance from other levels of government³¹.

However, one of the downsides of not having a public asset is relinquishing control to the private

^{25 &}quot;Fixed annual support [for subsidies] cannot be maintained given the increasing rate of market rents." Brenda Parai et al., Affordable Housing Options: Rent and Income Supplements (City of Calgary Community and Neighbourhood Services, June 2005): p.13

²⁶ Falvo, "Lack of Affordable Housing," p. 29

²⁷ Ibid., p. 33

²⁸ The authors assumed that the housing built would have a life-span of 30 years.

²⁹ Falvo, "Lack of Affordable Housing," p. 33

³⁰ Ibid., p. 32

³¹ The capital repair backlog in Toronto Community Housing, for example, is estimated to reach \$2.6 billion. While the City of Toronto has promised to cover a third of the funding — \$865 million — the Province and federal government have refused to commit to any funding themselves. Chris Selley, "Fix TCHC Apartments or Set Tenants Free," *National Post*, 20 July 2015.

market. When governments subsidize a unit owned by a private landlord, they have much less control over what happens to the unit upon vacancy. In Ontario, Section 7 of the *Residential Tenancies Act* (RTA) ensures that once a tenant occupies a private rental unit, the landlord is limited to annual rent increases³² that do not exceed the provincial rent increase guideline³³. However, once a tenant moves out, the landlord can set the rent at whatever price they wish. This policy is known as "vacancy decontrol".

In areas with low vacancy rates, landlords have an incentive to increase rents whenever the opportunity arises. In the past, these rent increases were sometimes mitigated through head lease agreements between the administrator of the rental subsidy and the private landlord, which stabilized rent increases at a lower level. However, a recent decision from Ontario Landlord and Tenant Board has made it easier for private landlords with head lease agreements to terminate tenancies³⁴. If the landlord decides not to continue the agreement, the rental subsidy program administrator must find a new private landlord to enter into an agreement with – at new market rents.

Service managers with rental subsidy programs acknowledge that some private landlords may decide not to renew their agreements once a tenant moves out. However, while some of these units may be lost at tenant turnover, they are confident that the program will be able find other landlords willing to participate. These agreements provide an incentive for landlords, as they offer a rent guarantee and reduce the time and effort required to attract new tenants. Some rental subsidy programs have invested in measures to support landlord participation, such as the provision of tenant insurance and damage deposits³⁵. However, landlords remain much more likely to enter into such agreements when vacancy rates are high or rising.

³² This protection does not apply, however, to a rental unit in a building that was constructed after October 31, 1991.

³³ The rent increase guideline is derived from the Consumer Price Index, which is a measure of inflation calculated by Statistics Canada.

³⁴ The Ontario Landlord and Tenant Board ruled that these "head lease" agreements are not governed RTA, but instead fall under the Commercial Tenancies Act. ONPHA, Head leases: Residential or Commercial Tenancy Agreements? (InfoON, March 2015).

³⁵ In the Vancouver implementation of the At Home/Chez Soi project, the program covered the costs of tenant insurance and damages in the rent supplement units – approaches that helped attract landlords to the project. Patterson, *The At Home/Chez Soi Project*, p. 17

What are the potential consequences of rental subsidy programs?

No new rental supply

One of the primary shortcomings of demand-side housing solutions is that they do nothing to alleviate the problem of inadequate rental supply . Providing some low-income households with a rental subsidy does not increase the number of available apartments in a jurisdiction. For the private market to adequately address the needs to the majority of households, including low and moderate-income families, vacancy rates must be at a minimum of three per cent³⁷. For this reason, rental subsidy programs are more appropriate in areas with high vacancy rates and significant affordable rental supply³⁸.

Some studies have concluded that the outcome of government-funded rental subsidies in areas with limited rental supply is an increase in rents across the locality³⁹. As rental subsidy programs are never expansive enough to offer subsidies to all eligible households in an area, the households that are not participating in the program can be negatively affected by the private market rent increases. There is evidence of this occurring through the housing voucher program in the U.S., where cities with a larger number of voucher recipients experienced more rapid rent increases across the board than those with a smaller number of recipients⁴⁰. The net effect was that low-income households who were not receiving any form of housing assistance were made worse off by the existence of the housing voucher program⁴¹.

³⁶ Parai et al., Affordable Housing Options, p. 14

J. David Hulchanski, *Housing Policy for Tomorrow's Cities* (Canadian Policy Research Networks Inc., December 2002): p. 16
"Unless there is a healthy vacancy rate and a supply of new affordable rental units coming on stream, normal market dynamics will lead to increased rent levels in general, i.e., for all tenants." J. David Hulchanski, *Shelter Allowances and Canadian Housing Policy: A Review and Evaluation* (Research Paper No. 47, Centre for Urban and Community Studies: University of Toronto, 1983): p. 46

³⁹ Scott Susin, "Rent Vouchers and the Price of Low-Income Housing," Journal of Public Economics (83) (2002).

⁴⁰ Ibid., p. 109

⁴¹ The many low-income households who were not receiving any kind of housing assistance experienced average rent increases of 16 per cent a result of the housing voucher system in their area. Susin concluded that the net effect of housing voucher program was negative, as while it provided \$5.8 billion in assistance to the households receiving the voucher, it cost other lowincome households \$8.2 billion in increased rental costs. Ibid., p. 145-146

The extent to which this argument is applicable to the rental subsidy programs in Ontario is unclear. Unlike the expansive voucher program in the U.S.⁴², rental subsidy programs in Canada tend to be smaller in scope. Some evidence demonstrates that housing allowance programs in Canada have not resulted in any above-inflation increases in rents⁴³. Still, the influence of rental subsidy programs on overall rental demand merits greater investigation in the Canadian context.

Place-based concerns

Rural communities across Ontario generally have less rental supply than urban areas⁴⁴. In areas where single-detached homes account for the majority of residences, vacancy rates can reach below one per cent, resulting in increased rent levels in the private sector. As one service manager noted, "The supply and demand issue is significant when there are no [available] rental units, so landlords can charge more. This means that the rent supplements have to be deeper in these areas."

When rental subsidies are increased to match rising rents, the number of subsidies that can be offered through each funding allocation is reduced. This is a particular challenge in Northern Ontario, where a combination of low vacancy rates in some communities and high utility costs can mean that subsidies must be significant in order to actually assist households.

Limited rental supply is not just a rural issue, however. It is also prevalent in suburban Ontario communities that were built-up after the 1960s and 1970s. In the rapidly growing York Region, for example, rental housing construction accounted for only one per cent of all housing starts from 2003 to 2013⁴⁵. The lack of rental housing, coupled with unaffordable homeownership costs – home prices increased 85 per cent in the area in the same time period⁴⁶ – has meant that low and moderate-income households have limited options in the private market, and may have to settle for rents that are disproportionately high when compared to the quality of the housing⁴⁷.

Because of the rental shortages in these areas, increasing the amount of new affordable rental supply may be a more pressing priority than in large urban centres. In Cochrane, for example, the District operates rental subsidy programs through federal-provincial funding, but has also developed a local housing corporation in order to create new affordable rental units. In the City of Windsor, however, most of the IAH funding is allocated to the rent supplement program⁴⁸. These decisions make sense based on the availability and cost of private rental units in each jurisdiction. In Windsor the vacancy rate is close to 5 per cent⁴⁹, and private rental units are readily available⁵⁰. But for other communities, rental subsidies are a less effective solution if the supply of rental units continues to be limited.

- 45 York Region, Housing Solutions: A Place for Everyone (June 2014): p. 4
- 46 Ibid.

49 CMHC, Rental Market Report: Canada Highlights (Spring 2015).

⁴² The Section 8 housing voucher program currently assists over 5 million households in the U.S. – which is more than a third of the population of Ontario as a whole (13.6 million). Robert Haveman, "Do Housing Vouchers Work?" *Pathways* (Spring 2013): p. 15

⁴³ John Sewell, Houses and Homes: Housing for Canadians (James Lorimer & Company, 1994): p. 129

 ^{44 &}quot;In most [rural Ontario] communities there is a lack of existing rental housing and construction, which in turn contributes to low vacancy rates, poor condition of existing units and high operating costs." Amanda Slaunwhite, *Under Pressure: Affordable Housing in Rural Ontario* (Canadian Policy Research Networks Research Report, December 2009): p. 12
45 York Pagion Housing Solutions: A Place for Evenuence (Union 2014): p. 4.

⁴⁷ Suttor, "Rental Housing Dynamics," p. 12

⁴⁸ SHS Consulting, Windsor Essex 10 Year Housing and Homelessness Plan: Background Report (April 2014): p. 13

⁵⁰ When demand for 1-bedroom units began to exceed supply on the RGI waiting list, the City was able to use rent supplements to provide households with 1-bedroom units in the private sector.

Housing quality and location

The quality and location of housing that participants are able to access in the private rental market are important considerations when evaluating the success of rental subsidy programs. While the programs increase the amount a household can afford to spend on housing costs, the only housing that some families can afford, even with a subsidy, may be located in low-income neighbourhoods that have poor access to transit, community supports, and employment opportunities.

Rental subsidy programs usually have a cap on how much an eligible unit can cost. This allows the program to ensure that the subsidy amounts do not become untenable. If the "maximum rental amount" for units is set at a low price point, the only eligible units may be ones that are isolated or in low-income areas.

In the same vein, if current funding for rental subsidy programs is not indexed for annual rent increases, the type of units that participant households can access may decline. A supportive housing agency in Ontario noted that because the funding for their rent supplement program was not indexed to increase along with rising rental and utility costs, they will have to adjust the units that are available to participants. While the agency currently provides rent supplements for one-bedroom and bachelor units in the private market, they may soon be only able to afford supplements for bachelor units.

In rental subsidy programs, discriminatory practices on the part of private landlords may also be difficult to manage. A recent *New York Times* article on the Section 8 housing voucher program in the U.S. reported that landlords with properties in affluent, predominantly white neighbourhoods often refuse to accept the vouchers, possibly due to stereotypes about the racial background and income level of voucher-holders⁵¹. Because landlords are legally entitled to refuse a voucher in many areas, the result is high levels of racial segregation along neighbourhood lines⁵².

Even when Section 8 initiatives specifically directed households to use the voucher in low-poverty neighbourhoods with good schools and transit, the majority of households returned to lower-performing neighbourhoods after a short period of time due to multiple barriers in the high-opportunity areas. These obstacles included issues with the lease or the private landlord, landlords abandoning the voucher program or increasing the rent above the voucher program ceiling, and dissatisfactory maintenance of units⁵³.

In Canada, the bulk of cities' support services – including programs for mental health and addictions, medical treatment, food banks, and community activities – are concentrated in the downtown core. But while downtown areas used to house large numbers of low and moderate-income households, the past three decades have reversed the trend. As noted in the landmark *Three Cities* report on Toronto's changing neighbourhood composition, low-income households are now concentrated in the outer areas of the city, where services are scarce⁵⁴.

⁵¹ John Eligon, "A Year After Ferguson, Housing Segregation Defies Tools to Erase It," New York Times, 8 August 2015.

⁵² Statistical analysis from the Brookings Institute reveals that the average Section 8 voucher household in urban area lives in a neighbourhood where, on average, three-quarters of the residents are non-white or Hispanic. Elizabeth Kneebone and Natalie Homes, "Promises and Pitfalls of Housing Choice Vouchers Vary Across the Nation," The Brookings Institution, 14 August 2015.

⁵³ Molly M. Scott et. al, *Expanding Choice Practical Strategies for Building a Successful Housing Mobility Program* (The Urban Institute and Poverty & Race Research Action Council, February 2013): p.1; 3

⁵⁴ J David Hulchanski, The Three Cities Within Toronto (Cities Centre, University of Toronto, 2010): p. 1

This is of particular concern to agencies that administer rent supplements for clients who have barriers to housing and who benefit from close access to support service providers. As downtown areas become increasingly affluent, rent supplement programs may not be able to cover the costs of units. This was the case in the Vancouver implementation of the At Home/Chez Soi project, where units in expensive neighbourhoods such as the West End and Kitsilano became too costly for the program⁵⁵. If rental subsidy programs can no longer place households in well-serviced downtown communities, they will have to connect participants to lower-cost units further from the core. As many of these households cannot afford public transit, they risk becoming isolated from the supports that they depend upon⁵⁶.

The above concerns regarding rental subsidy programs, however, may only be applicable to areas with low vacancy rates. In rental markets with higher vacancy rates, program administrators can often find well-maintained units for household participants in desirable areas. But for cities that are experiencing high rental demand, rental subsidy programs may need to be accompanied by broader policy initiatives at the municipal and provincial level. Implementing inclusionary zoning is one approach that could potentially curb the trend towards income polarization and neighbourhood inequality in cities with high-demand rental markets⁵⁷.

⁵⁵ Patterson, At Home/Chez Soi: Year Two Project Implementation, p. 21

⁵⁶ It is worth noting that in many Canadian cities, the social housing stock that was created in previous decades remains distributed in neighbourhoods across the city, with significant supply in downtown and central areas. Suttor, "Rental Housing Dynamics," p. 31

⁵⁷ Hulchanski, Three Cities, p. 12

Looking forward: Important considerations

In-situ can mitigate some consequences

In Ontario, a significant number of rental subsidies are offered in-situ, meaning in the unit where the receiving household already lives. In several local programs, such as the Region of Peel's Choice-Based One (CB1) program, the subsidy for all participating households is directed to their current landlord.

Providing a subsidy in-situ can reduce a number of the potential consequences associated with rental subsidy programs. Because participating households already live in the unit, the program does not contribute to reductions in rental supply, and the rent for the unit does not increase as a result of the tenant's higher purchasing power⁵⁸. All that has changed is that the rent level they were already paying has become more affordable, and the household now has more income to spend on other goods and necessities. With food bank usage rising 45 per cent in the past two decades and food bank users spending an average of 70 per cent of their income on housing costs⁵⁹, in-situ subsidy programs can go a long way to helping families while mitigating effects for other renters.

Because in-situ subsidies allow participating households to remain in their current unit, they also reduce the costs associated with having to relocate in order to receive rental assistance. In-situ subsidy programs can reduce concerns that program participants will be taken advantage of by private landlords, or that units will be in poor condition. As one service manager noted, "We want to put the [program] client in the driver's seat to determine their own housing situation. If they are already living in a unit that works for them, who are we to tell them it doesn't?"

In-situ programs may not work for households that need assistance locating housing and maintaining their tenancies, such as those attempting to exit homelessness. They also do little to improve the housing mobility of participants. But for independent households that are satisfied with their current residence, they can be a positive solution the problem of housing affordability.

⁵⁸ Tenants that are occupying a unit are protected from above-guideline rent increases under the Residential Tenancies Act.

⁵⁹ Ontario Association of Food Banks, Hunger Report, (2014).

Depth of subsidy

In rental subsidy programs, the "affordability gap" refers to the difference between the market rent for a unit and what a household can afford to pay, based on 30 per cent of their gross income. The amount of the affordability gap that the subsidy should cover is an area of consideration for program funders and administrators.

Many rental subsidy programs provide a "deep" subsidy by covering the entire affordability gap for participating households. This level of assistance, however, comes with a tradeoff: deep subsidies reduce the number of households that can be helped through the program. Because programs like the federal-provincial IAH Program allow service managers to determine the subsidy amount that households receive, they must weigh the costs and benefits of deep or shallow subsidies.

Very shallow subsidies, however, are often found to be ineffective. One service manager noted that during the provincially-funded Short Term Rent Supplement program, which provided monthly benefits of \$100-\$250 per household, nearly half of the area's participants were still unable to afford – and ultimately lost – their housing. When the service manager increased the benefit by only \$50 per month, tenants were significantly more likely to remain housed. Another service manager noted that they increased their local IAH housing allowance amount from \$180 per month to \$300 per month, as the former was not enough to offset the affordability challenges for households in the community.

Even monthly subsidies of \$300, however, may not be adequate to cover the entire affordability gap for many Ontario households. Determining how to assist the maximum number of households while providing a benefit that it is deep enough to make a real difference is a challenge inherent in rental subsidy programs, and requires continued local research and evaluation.

Permanent subsidies required for long-term stability

There are some households in Ontario that may benefit from a short-term, impermanent rental subsidy. Many service managers operate a rent bank or an emergency allowance fund for households in transition. These measures can go a long way towards reducing evictions and helping families through isolated incidents such as a job loss or injury. But for the one in five renter households that consistently spend more than 50 per cent of their income on housing⁶⁰, a more permanent solution is needed.

Both the Region of Halton and the Region of Peel have chosen to make their local rental subsidy programs permanent. As a result, participating households will continue to receive the monthly subsidy for as long as they remain eligible for the program. By contrast, many of the provincially-funded rental subsidy programs, such as IAH's rent supplements and housing allowances, are not permanent. Service managers must allocate all funding from the 2014 IAH extension by the year 2020, and program recipients will lose their subsidy by 2024⁶¹.

⁶⁰ ONPHA, 2014 Waiting Lists Survey Report, p. 17

⁶¹ Ministry of Municipal Affairs and Housing, *Investment in Affordable Housing for Ontario (2014 Extension) Program Guidelines* (Queen's Printer for Ontario, 2014): p. 32

With this in mind, some service managers have developed processes to ensure that households receiving rental subsidies have some long-term security. In Windsor, where the rent supplement program is funded through IAH, the City mandates that all households receiving the subsidy remain on the waiting list for RGI housing. Because their rent supplement is not permanent, this policy helps to ensure that they will have access to permanently affordable housing once the program funding expires.

If governments are increasingly viewing rental subsidies for private market units as a legitimate alternative to RGI housing, these programs must guarantee long-term assistance. While rental subsidies are attractive in that they can assist households in need much more swiftly than waiting – often years – for an RGI unit⁶², households should not have to sacrifice their long-term stability for a short-term solution.

Even households experiencing an immediate crisis may require permanent housing assistance. In a U.S. evaluation of households experiencing homelessness and domestic violence, a temporary, timelimited form of rental assistance had little effect on improving participants' housing situation or family wellbeing⁶³. Only a permanent housing voucher helped ensure families' security and stability going forward.

New build is still needed

While rental subsidies can provide important assistance for households, they must be complemented by investments in new construction⁶⁴. If housing is to be affordable for low-income households in the decades to come, continued government investment in new social and affordable housing projects is required.

This is especially true in areas where the current supply of rental housing is inadequate to meet the needs of renter households. In the Region of Durham, for example, owner-occupied homes account for more than 80 per cent of dwellings⁶⁵. The limited rental supply includes a shortage of existing bachelor and 1-bedroom apartments, which are increasingly in demand. This shortage can only be met through the construction of new rental units.

The need for new construction is relevant for all types of housing. While many participants of the At Home/Chez Soi project chose to live in the private market, the program stressed that true choice means that participants are able to access whatever units they wish, including ones in dedicated supportive housing buildings. As one agency noted, for every household on the waiting list that would like to rent a unit in the private market, there's another who would prefer to be housed in a social or supportive housing community. At present, the number of social housing units would have to increase by 70 per cent over night in order to house all of the households currently on RGI waiting lists in Ontario⁶⁶. Needless to say, the need for new social housing remains high.

⁶² The average wait time for an RGI unit in Ontario in 2014 was 3.83 years. For every household housed from the waiting list, two applications for housing are cancelled and three new applications are received. ONPHA, 2015 Waiting Lists Survey Report, p. 5

⁶³ Gubits et al., Family Options Study, Executive Summary

⁶⁴ Hulchanski, Shelter Allowances, p. 48

⁶⁵ Owner-occupied dwelling account for 82.7 per cent of all dwellings. The Regional Municipality of Durham, At Home in Durham: Durham Region Housing Plan 2014-2024 (2014): p. 12

⁶⁶ ONPHA, 2015 Waiting Lists Survey Report, p.5

Non-housing solutions

Rental subsidy programs are funded as housing programs, though they also function as income assistance programs. For the majority of Ontario households in core housing need, their primary housing challenge is affordability: they simply do not have enough income, either through employment or social assistance, to afford the cost of rent⁶⁷. Rental subsidy programs have improved housing affordability for many participants⁶⁸. However, other policy solutions can also improve housing affordability simply by increasing households' income or earning potential⁶⁹. These measures can include higher minimum wages, increased employment training and skills upgrading, more tax credits for low-income households, or increases to social assistance rates – all policy decisions that rest with the provincial government.

While areas like the Region of Peel have chosen to use their own funds for rental subsidy programs⁷⁰, service managers have significantly less tax revenue than the Province. As demonstrated through the ongoing upload of the Ontario Disability Support Program and Ontario Works benefits, responsibility for social assistance lies with the Province⁷¹. As housing programs directly affect the amount of income that households have, the Province bears responsibility for their success. The Ontario Government must support service-manager led initiatives to improve housing affordability, while also developing additional solutions that provide Ontarians with adequate income to meet their basic needs.

^{67 71} per cent of households in Core Housing Need pay more than 30 per cent of their income on shelter, but do not share the two other core housing needs (unit suitability and adequate state of repair). ONPHA, *Big Problems Need Bold Solutions* (2014): p. 4

⁶⁸ In the U.S., an evaluation of the Section 8 voucher program found that program participants were able to reduce their housing costs to an average of 36 per cent of their income, compared to non-program participants who continued to pay 44 per cent of their income for housing. Katz et al., *Rethinking Local Affordable Housing Strategies*, p. 24

⁶⁹ Pomeroy, "Comprehensive Affordable Housing Strategy," p. 295

⁷⁰ In 2011, Peel Regional Council committed to a \$17.1 million annual investment in order to create a rent supplement program that would reduce the number of households on the centralized waiting list. Region of Peel, "Housing in Peel: Report Two (Housing Investment Plan)," (25 October 2011).

⁷¹ It is also recommended that the Province revise the basis of rent setting for OW and ODSP recipients living in social housing from the rent scales, which are artificially low, to the maximum shelter allowance allowed under each program. For more information on this issue, see: ONPHA, A Simpler, Cheaper Housing Subsidy: Reimagining the Delivery of Housing Assistance in Ontario (July 2015).

Conclusion

The need for safe, secure housing that Ontarians can afford will only increase in the coming years. As policy solutions are implemented to address this rising need, it is important to steer clear of a one-size-fits-all approach. While rental subsidy programs have enjoyed an increase in popularity over the past decade, these programs can have both positive and negative effects for low and moderate-income renter households.

In order to significantly improve housing affordability, both demand and supply solutions are needed. This means that governments should not allocate all of their funding towards rental subsidy programs, regardless of their immediate benefits. Rather, a balanced investment in new social and affordable housing, coupled with rental assistance programs to provide immediate assistance to households in need, is required.

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Appendix A: Overview of Housing Programs and Demand in Ontario

In previous decades, the federal and provincial governments took an active interest in housing by investing in social housing communities⁷². In the mid-1980s, however, the federal government scaled back from funding new projects, and by 1993 announced that it would no longer fund any new social housing construction⁷³. The Province of Ontario followed suit, and from 1996 to 2000, no new social housing was created in Ontario for the first time in 50 years⁷⁴.

The neo-liberal assumption that the private sector would step in to meet the demand for affordable housing proved false. While in the 1960s and 1970s the production of rental supply roughly equaled the amount of rental demand (largely due to government funding and incentives), the number of rental units created each year since has dropped significantly⁷⁵. At the same time, the supply of affordable rental housing in Ontario has been impacted by the demolition of rental units and conversion to condominiums. Between 1996 and 2006, Ontario lost 86,000 rental units⁷⁶.

Meanwhile, the appetite for affordable rental apartments remained high: an additional 10,000 new purpose-built rental units are required annually in Ontario order to meet growing demand⁷⁷. Housing is the single largest expense in the majority of households' budgets, and is an inflexible cost. Over the past two decades, the number of Ontarians living below the Low Income Measure nearly doubled⁷⁸; the result is that many Ontarians are unable to find affordable housing in their communities. In the majority of Ontario cities, the income from a full-time, minimum wage job is not enough to afford an

⁷² These included mortgage insurance, favorable tax breaks, and even direct developer financing. Greg Suttor, "Rental Housing Dynamics and Lower-Income Neighbourhoods," (Neighbourhood Change Research Partnership, University of Toronto, May 2015): p. 20

⁷³ ONPHA, Timeline: A History of Social Housing In Ontario (Updated: 2015): onpha.on.org

⁷⁴ Ibid.

⁷⁵ New rental production in Canada since the 1980s has only been sufficient to address about 50% of rental demand. Suttor, "Rental Housing Dynamics": 21-22

⁷⁶ ONPHA, Where's Home? (2013): p. 4

⁷⁷ Ibid., p. 3

⁷⁸ Ibid., p. 35

average one-bedroom apartment⁷⁹. At least 200,000 Canadians experience homelessness each year, at an estimated annual cost to the Canadian economy of \$7 billion⁸⁰.

The federal and provincial governments returned to funding affordable housing through the Affordable Housing Program (AHP) in 2001 and the Investment in Affordable Housing (IAH) Program in 2011, which was renewed in 2014. These programs did not create any new social housing, but instead provided support for public and private developers of "affordable" housing units⁸¹. While the AHP and IAH Program have increased the supply of rental units, they have fallen short of their targets. Approximately 1,500 rental units have been added annually through the programs in Ontario – significantly less than the 10,000 new units that are needed⁸².

Evidence of the imbalance in the levels of supply and demand for affordable housing can be seen in the increasing number of households living in core housing need⁸³ and on waiting lists for RGI housing⁸⁴. Housing is a key social determinant of health, and households that are securely housed are significantly less likely to use costly emergency services. Access to an affordable home also helps reduce family stress and improve children's educational outcomes⁸⁵. Moreover, providing households with affordable housing is less expensive than the costs associated with precarious housing and homelessness⁸⁶. Some recent initiatives, such as the Ontario Government's 2014-2019 Poverty Reduction Strategy, have recognized the need to find solutions to the growing issues of homelessness and housing affordability⁸⁷.

⁷⁹ Current minimum wage in Ontario is \$11.25. ONPHA, "How Much Do You Need to Earn to Afford to Live in Your City?" Quick Connections (April 2015): qc.onpha.on.ca/2015/04/how-much-do-you-need-to-earn-to-afford-to-live-in-your-city/. For renters on social assistance, the picture is even more strained. At \$376 a month and \$479 a month respectively, the maximum shelter allowances for a single person on Ontario Works (OW) and the Ontario Disability Support Program (ODSP) are nearly 50 per cent below the average market rent for a one-bedroom apartment in most cities.

⁸⁰ Stephen Gaetz et al., The State of Homelessness in Canada 2013 (Homeless Hub Research Paper #4 2013): p. 5, 8

⁸¹ Because roughly one-third of the affordable rental units created through the programs are in the private sector, these units are unlikely to remain affordable after they have fulfilled their 20-year program commitment.

⁸² Due to the amount of current IAH funding, as well as the proportion of the funding that service managers are dedicating to rental subsidy (rather than capital) programs within IAH, it is estimated that even less units will be constructed during the current IAH extension.

⁸³ From 1991 to 2011, the number of Ontario households in core housing need increased by over 200,000 – from 408,035 households to 616,935. CMHC, "Housing in Canada Online: Reference Counts and the Definition of CMHC's Core Housing Need Universe," (Accessed online: July 2015): cmhc.beyond2020.com/HiCOControlCounts_EN.html

⁸⁴ Over the past decade, the number of households registered on lists across the province rose by over 40,000. ONPHA, 2015 Waiting List Survey Report (May 2015)

⁸⁵ ONPHA, Affordable Housing as Economic Development, (June 2015): p.8; Toronto Central LHIN Strategic Advisory Council, Housing and its Impact on Health Outcomes for Populations with (and as Risk of) Complex Care Needs (June 2015): p. 5

⁸⁶ While it costs the government \$918/day for a single hospital bed, \$134/day for a long-term care bed, and \$45/day for an emergency shelter, the average cost for social housing and low-needs supportive housing are between \$32 and \$39 a day per person. Ibid., p. 4

⁸⁷ *Realizing Our Potential: Ontario's Poverty Reduction Strategy 2014-2019* contains commitments to ending homelessness, increasing the number of supportive housing subsidies, and continuing investment in affordable housing.

Appendix B: About this focusON

This focusON report was produced by Wyndham Bettencourt-McCarthy, ONPHA's Coordinator of Policy and Research. For a greater understanding of rental subsidy programs, the author conducted short interviews with representatives from service managers and DSSABs, housing providers, and a provincial Ministry. All interviews were conducted on the basis of anonymity in June and July of 2015. The author would like to thank all interviewees for their time and insight.

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