

focus ON

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Local Housing and Homelessness Plans



ONPHA

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The **Ontario Non-Profit Housing Association** (ONPHA) represents 760 non-profit housing providers in 220 communities across Ontario. ONPHA’s members house approximately 400,000 Ontarians such as seniors, low-income families with children, Aboriginal people, the working poor, victims of violence and abuse, people living with disabilities, mental illness, addictions, HIV/AIDS 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.

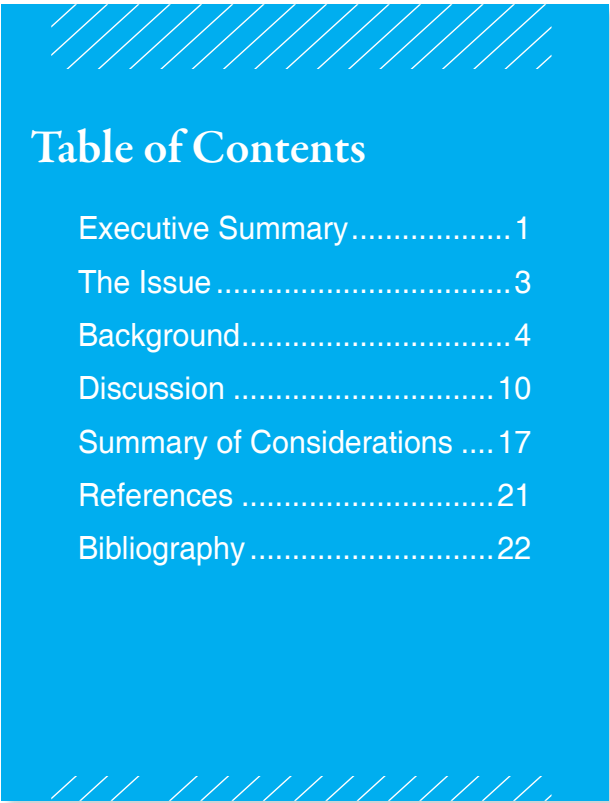


Table of Contents

- Executive Summary 1
- The Issue3
- Background.....4
- Discussion 10
- Summary of Considerations 17
- References21
- Bibliography22

Executive Summary

Through the Long-Term Affordable Housing Strategy and with the passing of the *Housing Services Act, 2011*, the Province has completed the devolution of Ontario’s social and affordable housing to municipalities. The Province now requires the development of 10-year local housing and homelessness plans that must reflect certain principles or “interests” that the Government has prescribed in addition to considering and responding to local needs.

A review of existing council-approved, housing-related strategies suggests that municipal Service Managers begin this work at a wide range of points. Many communities have already developed some type of affordable housing or homelessness strategy which may serve as a starting point for this new provincial requirement. Many others have not, or have developed strategies that are significantly different from the plans now required. In part, these circumstances reflect the breadth of Service Managers’ capacity and resources with some being in a much stronger position to meet the new Provincial requirements within the prescribed timelines, and then move from planning to implementation.

This report highlights some of the areas that ONPHA anticipates will affect the creation and implementation of local housing and homelessness plans. In addition to the varied capacity and resources of Service Managers to develop these plans, there are gaps in data and available data sources required to accurately understand the diversity of local populations and housing need.

To meet the Provincial requirements, Service Managers will be required to reach out into their communities to better understand local needs. However, their ability to collaborate with organizations and groups outside of their scope of administration is limited and will require the leadership of Provincial ministries to ensure that all community-based stakeholders are included within the local consultation process.

Invariably, 47 unique plans will emerge, each reflecting the diverse needs of Ontario communities, that will guide investment in local affordable housing. The Province has rightfully placed the onus to plan for local solutions within the hands of local government. However, the Province must continue to do its part to by ensuring a minimum standard that provides consistency in care and support across the province with predictable and adequate long-term funding.

Engaging communities in discussions about where they are at present and where they envision themselves in future regarding housing and homelessness services will hopefully generate a wide range of ideas. The benefits of affordable housing will then become clear at an individual, community and provincial level. With vision, capacity and proper supports, local housing and homelessness plans will help to move Ontario closer to the provision of proper affordable housing for all.

The Issue

Ontario's Long-Term Affordable Housing Strategy (LTAHS) and the new *Housing Services Act, 2011* (HSA) complete the devolution of social and affordable housing to Ontario's 47 municipal Service Managers¹, and provide them with greater control and flexibility over the local housing and homelessness service system.

Under the HSA, Service Managers are required to create, implement and monitor local housing and homelessness plans and to respond to identified local needs while taking into account the provincial interests and policy directions outlined in the HSA and the *Ontario Housing Policy Statement* (OHPS). These plans must be in place by January 1, 2014, a deadline which will approach quickly given that the planning process must include community consultation, a review by the Minister of Municipal Affairs and Housing and municipal council approval.

The requirement for local housing and homelessness plans creates an opportunity for the development of plans that are uniquely responsive to local circumstance and that respond to those specific needs with innovative community-based solutions to the lack of affordable housing. However, this is no small task. Many Ontario municipalities have previously developed some form of affordable housing or homelessness strategy which may be used as a foundation for their HSA-mandated plan. A review of these existing, council-approved strategies provides an indication of the capacity of Service Managers and the housing sector, the resources needed, and the possibilities and challenges for this new iteration of planning. This *focus ON* explores key considerations as Service Managers begin the process of creating the plans which will drive the future of affordable housing in Ontario.

¹ Service Managers are responsible for delivering and administering social and affordable housing, and for administering social service programs (e.g. Ontario Works, child care). Ontario has 47 Service Managers, including 37 municipalities and 10 District Social Services Administration Boards (DSSABs) in northern districts.

Background

Review of Existing Community Plans

The late 1990s saw a renewed focus in Ontario on municipal involvement in the development of social and affordable housing, following the withdrawal of both federal and provincial governments from the funding of new affordable housing and the downloading of existing social housing to Consolidated Municipal Service Managers (now known simply as Service Managers). In the intervening years, many Ontario communities developed affordable housing and/or homelessness strategies, sparked by a growing awareness of housing and homelessness issues in their communities coupled with the increased responsibility for housing and social services administration and delivery.

Service Managers are now required to complete local housing and homelessness plans under the HSA. The Province has outlined some basic requirements for the content: plans must identify current and future housing needs; set objectives and targets related to identified needs; describe actions to meet these goals; and indicate how progress will be measured. Local plans must also address matters of provincial interest outlined in the HSA and be consistent with the OHPS [see sidebar on page 5].

In the stated interest of preserving Service Manager flexibility, and perhaps to avoid ‘re-inventing the wheel’, the Province has not produced detailed guidelines or templates for the plans beyond the basic requirements outlined in the HSA and the OHPS. Instead, The Ministry of Municipal Affairs and Housing (MMAH) has released *Municipal Tools for Affordable Housing*, which refers Service Managers to several current, approved affordable housing strategies as examples, and catalogues a variety of municipal approaches to support affordable housing development.

Areas of Provincial Interest

In the HSA, the Province states that there are provincial interests in a system of housing and homelessness services that:

- is focused on achieving positive outcomes for individuals and families
- addresses the housing needs of individuals and families in order to help address other challenges they face
- has a role for non-profit corporations and non-profit housing co-operatives
- has a role for the private market in meeting housing needs
- provides for partnerships between different levels of government and others in the community
- treats individuals and families with respect and dignity
- is co-ordinated with other community services
- is relevant to local circumstances
- allows for a range of housing options to meet a broad range of needs
- ensures appropriate accountability for public funding
- supports economic prosperity
- is delivered in a manner that promotes environmental sustainability and energy conservation

Housing Services Act, R.S.O. 2011, c. 6, Sched. 1, s. 4(1)

ONPHA conducted a review of existing council-approved affordable housing strategies in Service Manager areas to determine if current strategies include components mandatory in the HSA. The goals of the review were to:

- compile an inventory of Service Managers that have completed affordable housing strategies,
- analyze existing plans and strategies in order to determine to what extent they meet HSA requirements,
- develop key considerations in the development housing and homelessness plans.

We contacted the 47 Service Managers in May, 2011 to determine if their area had a council-approved affordable housing or homelessness strategy and obtain copies for review. Three Service Managers did not respond to requests. Of the 44 Service Managers who responded,

- 26 Service Managers have current council-approved housing-related strategies
- 18 Service Managers do not have current council-approved affordable housing strategies or other plans in place. Two Service Managers reported that they have begun the process of plan creation in anticipation of HSA requirements

Five of the 26 documents reviewed are essentially different from the HSA required housing and homelessness plans. These are generic housing related documents that include some useful information for the development of local housing and homelessness plans but are missing substan-



tial portions of the research and analysis necessary to complete an HSA-compliant housing and homelessness plan.

A number of the existing community strategies were originally developed to meet requirements under the Federal National Homelessness Initiative Supporting Communities Partnership Initiative (SCPI). The SCPI program funded communities to develop strategies that identified local needs and gaps in services, and planned for a “continuum of supports” approach to meet the needs of persons experiencing homelessness. Communities could then apply for SCPI funding for projects to address the intermediate and long-term needs of homeless persons. Many of these community strategies were updated as part of the SCPI process and/or to provide a basis for funding requests through the Canada-Ontario Affordable Housing Program (AHP) in later years. However, as Table 1 shows, most of these plans were approved over five years ago.

Year	No.	Year	No.
2002	2	2007	2
2003	1	2008	3
2004	4	2009	4
2005	3	2010	3
2006	3	2011	1

In our review, we found that:

- Nearly all of the reports meet the criteria for an assessment of current and future housing need.
 - » Most strategies include census data, official plan information and an inventory of current social housing and shelters in the region, as well as an analysis of housing stock in the region compared to the rest of Ontario, and other relevant information such as proportion of rental housing to home ownership and regional social housing wait list information.
 - » The Consultation process currently outlined in the HSA was met by most strategies. Consultation participants typically included both non-profit and private housing providers, community agencies, city planners, city employees and tenants.
- Strategic directions or goal setting were included in most strategies and action items for fulfilling these goals were common.
 - » Most include a working definition of affordable housing. This definition has changed over time. Early strategies published prior to the AHP defined affordable rental housing as those rental units that require 30 per cent or less of a tenant’s gross family income. More recent definitions define affordable housing as the least expensive of the 30 per cent guide-

line and rent which is at or below the average market rent of a unit in the regional market area.²

- » Some strategies outline targets for the creation of new rental housing based on projected population growth; however, many of the strategies necessary to meet those targets were not within the control of the Service Manager or region.
- » Many action steps involved advocacy for systemic change at various levels of government, for example the elimination of capital taxes on rental properties and increases to Ontario Works and Ontario Disability Support Program rates by the Provincial Government, and changes to the tax structure to create incentives for constructing new rental housing by the Federal Government. Some strategies included more specific targets and actions within the Service Manager’s purview (e.g. “1,000 units is the collective target to be committed on or before December 31, 2015”).³
- Only the newest strategies included specific plans for measuring progress, generally in a report card format.

We also reviewed the existing strategies to see to what extent they met the twelve areas of provincial interest laid out as criteria to be met by local housing and homelessness plans. These twelve areas may be grouped in the following categories:

Broad philosophical principles, easily met by strategies

Several of the provincial interests express broad, guiding principles which are more statements of philosophical approaches than quantifiable goals, and are easily met by most strategies. These include the desire to ensure that work at the local level is done with an eye to creating positive outcomes for individuals and families. They also affirm the need for local plans to make certain that citizens are treated with both dignity and respect and that a range of housing is developed to ensure that the needs of many are met.

All strategies reviewed highlighted a desire to strengthen families and communities through the measures identified, and included descriptions of the local context. In addition to highlighting the need for increased affordable rental housing, many strategies also presented home ownership as an option and offered ideas to make home ownership available to a wider sector of the population. This is particularly relevant in smaller communities where home ownership is more accessible to low income earners.⁴

2 SHS Inc. (2005) p. 87

3 OrgCode (2010) p. 79

4 For example, in Chatham–Kent in 2006 72.2% of households were home owners with an average home price of \$127,231. SHS Inc. (2006) p. 108



Definition of sector and scope, met by most strategies

Several interest statements identify key stakeholders in the sector, and direct Service Managers to include these stakeholders in plan development. These statements are met by most of the reviewed strategies.

The Province recognizes the roles of the non-profit and co-operative housing sectors as well as the private market in meeting local housing need. Many of the strategies noted that it is the non-profit sector that has created and managed most affordable housing in their communities and building upon the strength of this sector is a common theme. At the same time, most strategies included builders and property managers in their consultation process and looked at the role of private sector companies in meeting the growing demand for affordable housing.

The Province also encourages partnerships among governments and others in the community. Most strategies include a section that states a commitment to lobbying the Federal and Provincial governments for increased resources for affordable housing, though it is questionable whether lobbying would fulfil the partnership criteria.

An interest in greater co-ordination between housing and homelessness providers and other community-based services is also identified by the Province. Evidence of increased coordination was apparent in most strategies, many of which included consultations with community-based service providers such as mental health organizations (e.g. the Canadian Mental Health Association) or organizations that serve people with disabilities (e.g. Community Living) and, in some cases, the strategies included recommendations that such community-based services be engaged to provide service to vulnerable people. Finally, some local plans recognized the need for regular and on-going dialogue about housing-related issues and suggested the creation of community coalitions or networks.

Implementation principles, not addressed or met by strategies

Some of the provincial interest statements were not identified or addressed in the strategies that ONPHA reviewed. For example, the Province identified a desire to see the housing needs of individuals and families met as a first step toward addressing other challenges they may face. Few strategies touched this issue. The City of Toronto strategy includes a “Housing First”⁵ principle statement which is to be used as a policy directive; however, there is no clear statement of what exactly Housing First entails or how that should be implemented.

Similarly, the Province’s environmental sustainability and energy conservation objectives were also not addressed by the strategies reviewed. Some strategies, depending on their date of publication refer to Social Housing Renovation and Retrofit Program (SHRRP)

5 “Housing First” is a model of support and housing that offers chronically homeless individuals and families access to permanent housing and they supports they need to maintain that housing.

funding but none include a plan to increase energy efficiency incentives beyond that existing program.

The Province recognized the powerful role of affordable housing in supporting economic prosperity; none of the strategies reviewed explicitly addressed the role of affordable housing in supporting local economies.

Finally, the Province also identified an interest in ensuring that local housing and homelessness plans had appropriate accountability for public funding, a requirement that was not explicitly addressed in any strategy reviewed.

This review of earlier plans shows the benefits of the planning process, engaging communities to think through the dimensions of housing and homelessness issues at the local level, and drawing on community knowledge and energy to develop innovative partnerships and solutions.

The review also highlights the challenges municipalities face in planning to address housing needs at the local level, when those needs are greater than the local funding capacity, and require solutions which extend beyond the limits of local authority.



Discussion

10

Local housing and homelessness plans will guide the development and administration of housing programs in all corners of the province and have the potential to change the face of affordable housing in Ontario. Some Service Managers will be in a stronger position given their resource capacity and will easily adapt current plans to meet HSA requirements within the timeframe laid out by the MMAH. Others will face challenges in creating a local housing and homelessness plan without the benefit of a body of existing work and the resources available to complete the tasks involved. In this section we review a number of significant areas affecting both capacity to create these plans and capacity to move from plans to implementation.

Scope

Under the LTAHS, HSA and OHPS, the Province has outlined a broad scope for local housing and homelessness plans. Ontario's vision for affordable housing "is to improve access to adequate, suitable and affordable housing, and provide a solid foundation on which to secure employment, raise families and build strong communities,"⁶, and Service Managers are directed to address the housing and homelessness services system across the continuum of need from those who are literally homeless on the street to those who can afford ownership housing. While there are challenges to face, the planning process offers the opportunity and space for dialogue at the public level and across sectors and funders to create new strategies to achieve this vision, leading to a more responsive, efficient system, and lessening the likelihood of people falling through the cracks.

According to the OHPS Service Managers are expected to integrate a broad range of community needs in the development of local plans. People with disabilities, victims of domestic violence

6 Ministry of Municipal Affairs and Housing. (2011). p.1

and Aboriginal peoples living off-reserve are noted as groups that must to be considered⁷, and the OHPS provides a list of examples of other groups that may require special consideration, including youth, women, and seniors. This spirit of inclusivity ensures that plans address the needs of vulnerable groups, but also presents a challenge as each Service Manager must determine how to best assess community needs with respect to marginalized groups and manage competing needs when developing responses.

The OHPS also includes co-ordination with other community services as a policy direction: local housing and homelessness plans are expected to “demonstrate how progress will be made in moving toward integrated human services planning and delivery.”⁸ Co-ordination at the local level may be more easily managed than on a larger scale, depending on the size of the Service Manager area and the strength of existing connections. Service Managers have a direct relationship as administrator and funder of some aspects of the housing and homelessness service system, including transferred housing providers. However, the co-ordination of services across the housing and homelessness services continuum also requires the involvement of federally and provincially funded agencies providing a range of services (e.g. settlement, legal, and housing help services, supports for persons with disabilities), as well as supportive housing providers under the purview of the Ministry of Health and Long-Term Care (MOHLTC) and the Ministry of Community and Social Services (MCSS). The creation of a comprehensive plan requires the involvement of these ministries, and entities including the Local Health Integration Network and the Community Care Access Centre.

The goal of greater co-ordination and integration requires additional consideration of the relationships among the various players in the housing and homelessness system, with a delineation of roles, responsibilities and accountabilities. It may require a fundamental shift in operations and relations and the removal of impediments in terms of communications, expectations and funding. While the Province and Service Managers have been working towards developing a system of integrated human services planning and delivery in Ontario, there has not yet been a clear articulation of what that system will look like. Local housing and homelessness plans are being developed in advance of multi-purpose Integrated Human Services Plans, and ideally the two processes will inform each other.

Needs Assessments

An evidence-based assessment of need is a crucial beginning point of plan creation and requires a nuanced understanding of demographic trends and statistics. The calculation of future housing demand requires consideration of population growth in various age ranges, taking into account trends in fertility and mortality rates, in- and out-migration including immigration, and house-

7 Ministry of Municipal Affairs and Housing. (2011). p.9

8 Ministry of Municipal Affairs and Housing. (2011). p.6

hold formation based on age-specific headship rates. This calculation also requires analysis of economic and household income and asset trends at the local and broader levels.

Service Managers will require access to timely, reliable data that matches their geographic boundaries. Most of the existing community strategies rely on Census data for the needs assessment, but it remains to be seen what effect the end of the mandatory long-form Census may have on data availability and reliability. Service Managers may need assistance in identifying and accessing data sources between Censuses, as well as for priority groups including victims of domestic violence, persons with disabilities, and other groups recognized within the OHPS (e.g. women, Aboriginal people living off-reserve, youth)

In addition to data regarding the local population, Service Managers will require information regarding the age and condition of the existing housing stock, as well as data for the following key elements of the housing services system:

- **Secondary Rental Markets:** The secondary rental market, which includes rented single- and semi-detached houses, duplexes, accessory suites and rented condo units, provides a key source of rental accommodation in many communities. Currently CMHC collects and reports data for the secondary market in three Ontario municipalities only: Greater Toronto Area, Ottawa, and Barrie. While it may be possible to estimate the overall size of the secondary rental universe using other sources, it is difficult to analyze the contribution of the secondary rental market to meeting housing demand and particularly affordable housing demand without data showing the number of units by bedroom size and average rents.
- **AHP:** Units built or subsidized through the AHP rental, affordable home ownership and housing allowance streams contribute both to the local housing stock and affordable rental and ownership, at least for a set period. Ideally the assessment of the local housing stock would include information regarding the number of units provided through the various AHP streams and their projected affordability over time.
- **Existing Social Housing Stock:** Assessments should also include an inventory of the existing social housing stock documenting building condition and capital needs for each project, as well as dates for end of operating agreements and mortgages dates and assessments of ongoing viability.

In order to ensure provincial consistency and to encourage meaningful target setting, a standardized method for determining housing need should be created.

Consultation Process

The review of earlier plans clearly showed the value of consultations as a means of community engagement and relationship-building, and as a source of knowledge about the community. The consultation process is one that needs to be shaped and created as an inclusive forum for meaningful discussion. To date, the Province has provided no guidelines or best practices for the consultation process. Some clarification about the process would be helpful to ensure that community resources are best utilized in the development of local plans.

From the review of existing affordable housing strategies it is apparent that to fully benefit from local expertise community members should be consulted not only at the preliminary stages but throughout the process including the development of action strategies. At the same time, the inclusion of community members in the various stages of the plan creates an understandable sense of ownership, which may assist the Service Manager to manage expectations regarding the breadth of and outcomes for the plan.

The participation of community members, including non-profit housing providers and their tenants, is essential to creating local plans that are responsive to the needs of low income households and those who are difficult to house. In addition to providing front line information about the income and support needs of their tenants, housing providers can provide realistic cost data pertaining to the rent revenues and operating expenses as well as current information about the state of the stock which, in turn, can help Service Managers better predict subsidies and future capital needs, and set municipal housing budgets. The boards of housing providers are community members and as such can provide insight into future housing needs as well as serving as political allies in a quest for community acceptance of social housing.

Of prime importance will be the inclusion of those supportive housing providers which are funded by the MOHLTC and the MCSS, and do not fall under the Service Managers' administration. These providers and their tenants will be able to give Service Managers better insight into how tenants living with mental health and addiction issues, physical disabilities, and other challenges may need to be supported. Service Managers may wish to consult with sector organizations in advance to get a better understanding of the various types of housing providers that exist and with whom the Service Manager may wish to consult.

Accountability

Under the requirements of the HSA, Service Managers must describe the measures which will be used to track progress toward meeting the goals and targets outlined in the plan. The Province is currently consulting with Service Managers to develop performance measures and reporting formats, and hopefully these consultations will lead to the development of meaningful measures and requirements for transparent reporting. This is an opportunity to move beyond tracking numbers served or housed to developing an understanding of the factors contributing to positive outcomes. It is also an opportunity to develop reporting processes that allow Service Managers

and communities to communicate successes and to share learnings, not only within their areas but also across the province.

As performance measures and reporting requirements are developed, questions remain regarding compliance and accountability, particularly around the process of the Ministerial review.

The HSA requires that a Service Manager must provide a copy of its local housing and homelessness plan to the Minister of Municipal Affairs and Housing for comment, and consider these comments before approving the plan. Under the process as it stands, the Minister does not approve Service Manager plans, but rather provides comments for consideration before the plan is finalized and approved by council. The Minister may exercise remedies under the Act if a Service Manager does not complete a plan or the plan does not meet the requirements under the HSA and OHPS.⁹ However, the criteria for the review by the Minister are not clearly laid out. Further, a system for resolving differences between Service Managers and the Ministry during the review process has not been established. If the local plan is sent back with comments, is a Service Manager obliged to respond in a specific way? Will the plan then need to be sent back for additional review?

Following the initial review of local plans, what will be the process for ensuring ongoing compliance as the plans progress into action? The HSA states that at least once every five years, a Service Manager shall review its housing and homelessness plan and amend it as is deemed necessary by the Service Manager. The Service Manager will also need to report on the amendments to the Minister. What will be put in place to ensure that post development the plans' successes are monitored?

Once the plan is reviewed by the Minister, the Service Manager, after taking comments into consideration, recommends the plans to Council for approval. Council is directly accountable to the general public who elected its members. That final tier of accountability is crucial to the success of a localized vision of affordable housing since those citizens who will most directly be impacted by the plans have the democratic right to decide who approves the plan. The reporting requirements now in development must include a clear process for informing the public of both the plan itself and progress toward meeting targets.

Capacity and Resources

In the years since devolution, Service Managers have been building capacity to administer and deliver social housing. However, the increased scope of the new local housing and homelessness plans may require additional capacity and resources.

The development of comprehensive local plans requires skills and resources to conduct needs assessments, community consultations and strategic planning activities, as well as ongoing moni-

⁹ *Housing Services Act, R.S.O. 2011, c. 6, Sched. 1, ss. 8, 23 (1).*

toring and reporting. For 19 of the 27 existing strategies reviewed, Service Managers employed external consultants to conduct the planning process and write the plan, and 17 of the 19 were completed by one consultancy. This raises questions about both the capacity within Service Manager areas to complete comprehensive plans and the capacity of the affordable housing consultant sector to support the development of a large number of plans in a very short timeframe.

While a number of Service Managers have some form of affordable housing or homelessness strategy in place already, many of these strategies are over five years old. There is no clear standard for regarding the level of updating necessary in regard to needs assessments and community consultation to make older strategies compliant.

Under the National Homelessness Initiative, the SCPI provided 100 per cent funding to communities to develop community plans. Despite the enormous task ahead for many Service Managers in creating compliant local plans, the Province is not funding Service Managers directly to complete their plans. Service Managers will receive some indirect assistance from the Province: the Ontario Municipal Social Services Association (OMSSA) has been funded to provide a resource centre and services to Service Managers to assist with the creation of local plans. Service Managers are also eligible to receive \$100,000 upon signing the Administration Agreement for the Investment in Affordable Housing program, to assist with planning and pre-development activities. While this money is not intended to fund the creation of housing and homelessness plans, it can fund activities related to needs assessment and planning, which may also inform the local housing and homelessness plan process.

Within the Service Manager world District Social Services Administration Boards (DSSABs) face additional challenges in undertaking housing and homelessness planning, and developing, funding and delivering housing and homelessness services. DSSABs were originally created to administer social services in northern communities before the administration and delivery of housing services were downloaded to the local level. DSSABs do not have powers or resources fully equivalent to municipalities and are particularly disadvantaged due to limitations on their ability to raise funds through debentures to create or improve affordable housing. DSSABs can only raise funds based on the borrowing ability of individual municipalities within their service areas. As most municipalities in DSSAB service areas are small in terms of volume of debentures, even with a good credit rating rates for debt may be higher. Until the differentials between municipal and DSSAB Service Managers are addressed, northern regions will continue to be at a disadvantage.

Funding

Lack of stable, adequate funding has been and continues to be the greatest limiting factor to the planning and delivery of housing and homelessness services including the development of new affordable housing and the maintenance and revitalization of existing social housing stock.

The tension between the direction to create a long-term, comprehensive plan and the reality of sporadic, program-constrained funding creates a fundamental challenge to the planning process.

Without an adequate, predictable funding source, it will be difficult to create and maintain momentum.

The funding situation is unlikely to change soon, given the current climate of austerity. However, the move to more flexibility in fund allocation may assist to some extent. As part of the 2008 Provincial-Municipal Fiscal and Service Delivery Review, the Province began uploading responsibility for some programs previously downloaded to municipalities, including social assistance benefit programs, presumably creating greater room in municipal budgets to fund affordable and social housing. The provincial direction toward consolidation of housing program funding allows more flexibility at the local level in terms of how dollars are spent. While there are defined parameters for the new Investment in Affordable Housing funding streams, the program allows greater flexibility to Service Managers in choosing how to direct allocations among those streams.

That being said, municipalities need additional, predictable funding to enable them to deliver appropriate, sustainable affordable housing. Although the responsibility for planning and delivering affordable and social housing rests at the municipal level, housing plays a foundational role in successful outcomes in the areas of health and education, and should not be viewed as divorced from these areas of provincial responsibility. Housing is not an expense, but rather an investment that helps manage costs in health and education, and housing policy can be used to mitigate costs in these areas. Government should not be dealing with these areas as separate items. There needs to be more, overt integration among health, education and housing, reflecting their intertwined nature, leading to the reconfiguration of funding to create housing as a preventative and cost-saving measure for health and education outcomes.

Provincial Standards

Through the HSA, the Province has presented a vision for housing that is supported by requirements for compliance and an assertion of the importance of affordable housing in Ontario; yet, at the same time that a comprehensive vision for housing in Ontario is being presented, there is a further distancing by the Province from the actual realm of housing. While the ability to respond to local circumstance has the potential to engage communities in the creation of innovative local solutions to housing and homelessness issues, there also exists the potential to create a province where regional inequality negatively impacts the most vulnerable citizens; the creation of local plans and Service Manager flexibility could create an Ontario where the systems of delivering affordable housing are inconsistent across regions. The end result will be dependent on the capacity and access to resources in each area, as well as the will of the municipality to effectively engage and tackle the issue of housing need. Ultimately, it is the Province that has the duty and responsibility to ensure consistent standards are maintained across the province, and to minimize disparities in the responses to low income households created by regional differences and market forces.

Summary of Considerations

The creation of local housing and homelessness plans has the potential to change the landscape of affordable housing in Ontario. While we don't want to miss an opportunity to be truly responsive to local needs, some amount of caution is necessary as we move forward. In order to ensure that the full potential of the spirit of the HSA is met, the following considerations must be taken into account:

1. A level playing field must be created among Service Managers.

Not all Service Managers are created equally in terms of capacity and resources. In particular, the disparities between northern District Social Services Administration Boards and municipal Service Managers must be examined and addressed to ensure a level playing field.

In order to fulfill the vision of the LTAHS, the Province needs to ensure some consistency in how plans are developed. The provincially-funded OMSSA resource centre for Service Managers will facilitate sharing of guidelines and best practices. However, under-resourced Service Managers may need direct funding to ensure that the plan development process is an honest stride toward housing all Ontarians in safe and affordable housing.

2. A reliable picture of housing need in communities is required across the province.

Service Managers require access to a range of reliable, relevant data for the assessment of need in their communities. The Province may need to engage additional, special data runs from CMHC and Statistics Canada, and provide funding for local resources where data does not exist for certain Service Manager areas.

To create a reliable picture of housing needs across Ontario, we need consistent, comparable needs assessments in Service Manager areas, which then may be rolled up at a provincial level, perhaps by a sector organization such as the Housing Services Corporation.

3. Community engagement + community action = effective, local results

While Service Managers are required to consult with the public as part of the planning process, the HSA does not provide additional guidelines regarding the expected parameters of these consultations. Time and resources must be taken into consideration, but given the scope of the local housing and homelessness plan, there is value in conducting a comprehensive consultation process, reaching out to people with lived experience and housing service providers across the continuum, including supportive housing providers and service providers funded through the MOHLTC and the MCSS.

A comprehensive consultation does require more time and resources; however, meaningful consultation at the assessment and goal setting stages allows Service Managers to benefit from stakeholders' specialized knowledge of local dynamics, and facilitates collaboration, coordination and innovation. Consultation can create expectations, but it also creates commitment, both to the plan itself and the hoped-for results.

4. Sector members need to be ready to participate.

Sector members must consider how best to contribute to the consultation process, in terms of providing input regarding the broader services system as well as specific knowledge and expertise related to their own agencies or organizations. In the case of the non-profit and co-operative housing sectors, which are identified within the provincial interests and OHPS as key elements in the housing and homelessness system, providers and members must be prepared to provide information about their housing, including mandates and targeting plans, financial data including capital reserves, building condition (e.g. Building Condition Audit or Energy Audit), and salary and support needs based on tenant populations. It is better to give too much than too little.

5. Provincial ministries can show leadership through inter-ministerial co-ordination and collaborative engagement in the planning process.

Despite devolution many areas of the housing and homelessness services system overlap with provincial ministries and bodies including MOHLTC, Local Health Integration Networks, Community Care Access Centres, and the MCSS. While Service Managers have responsibility to address the broader housing and homelessness services system including these overlapping areas, provincial Ministries can show leadership by developing practices for inter-ministerial co-ordination and collaboration, participating in Service Manager planning processes including consultations, and providing information and materials to Service Managers including information about housing providers under their purview.

The Province can also take responsibility for removing impediments at the provincial level, whether legislative, regulatory or financial, to the ongoing sustainability of affordable housing in the private and non-profit sectors and the development of new affordable housing, and commit to working with federal partners to remove impediments at that level.

6. Local flexibility and provincial-level standardization must be balanced.

The MMAH should consider whether it needs to strengthen its process for review and input regarding local plans, at least to develop clearer criteria for the review and greater transparency for process. The structure for compliance reporting needs to be clarified and to include more specific basic standards for housing direction. This will ensure that there is a provincial standard upheld while allowing for local and innovative responses to local housing issues.

The Province is ultimately responsible for ensuring vulnerable citizens across the province can count on certain consistent, minimum standards in the housing and homelessness service system, and for working to minimize differential treatment and development of have and have not communities.

7. Municipalities need adequate, predictable funding to enable them to deliver appropriate, sustainable affordable housing.

The Province had taken a number of steps regarding funding for affordable and social housing, including the uploading of previously downloaded social services programs to create cost room in municipal budgets for housing; cost-sharing funding with the federal government under the AHP and the new Investment in Affordable Housing program; and working to consolidate the patchwork of housing services funding streams to allow greater responsiveness at the local level. However, none of these initiatives have resulted in adequate, stable funding to meet the need for affordable housing in Ontario. Housing is foundational to health and education outcomes, and the Province, Service Managers and other sector partners must explore new ways of thinking about funding affordable housing and providing income supports to ensure that we attain the goal of greater access to affordable housing for Ontarians.

8. The bigger vision must be maintained.

Despite the current atmosphere of austerity and the reality that need is greater than resources, now is not the time to turn our face from the need or truncate the vision at either the provincial or the municipal level. Local housing and homelessness plans can capture the ideas and energy of communities as they work toward the goal of ensuring all Ontarians have decent, affordable housing, in communities that are strengthened by addressing the needs of their most vulnerable citizens. Over time, the information and experience gathered through the needs assessments, strategies and reporting mechanisms of the plans can also provide the impetus for housing policy creation at the provincial level

and beyond. The benefits of affordable housing are clear at an individual, community and provincial level; with vision, capacity and supports, local housing and homelessness plans will help to move us closer to the provision of adequate, affordable housing for all.

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