

Toronto Community Housing



Toronto Community Housing Corporation
931 Yonge Street
Toronto, ON
M4W 2H2

Briefing Note: For Information

To: Tenant Services Committee (“TSC”)

From: Nadia Gouveia, Acting Chief Operating Officer

Date: March 20, 2024

Re: TSC Meeting of February 5, 2024 – Process Update – Overhoused Households [Report TSC:2024-04] (Public Action Item #6)

BACKGROUND:

At its meeting of February 5, 2024, the Tenant Services Committee (“TSC”) directed that when bringing [Report TSC:2024-04](#), Process Update – Overhoused Households, to the Board of Directors’ February 15, 2024 meeting, that management provide the following updates to the materials:

- the number of households on the Overhoused waitlist broken out by the number of years they have been on the waitlist;
- an action plan with the anticipated targets to be achieved in 2024;
- the percentage of Overhoused households that request a review of their file; and
- the number of households who moved as a result of the Overhoused pilot.

While the updated information was prepared as part of the presentation materials for the February 15 Board meeting, the item was not held for discussion. As a result, the updated presentation is being provided to the TSC for their information as part of the materials for the April 11, 2024 meeting (see Attachment 1).

SIGNATURE:

“Nadia Gouveia”

Nadia Gouveia
Acting Chief Operating Officer

ATTACHMENT:

1. Overhoused Process – Overview and Approach (Updated Presentation)

STAFF CONTACT:

Lindsay Viets, Director, Operations Planning & Program Support
416-981-4131
Lindsay.Viets@torontohousing.ca



Item 5 – Business Arising from the Public Meeting Minutes and Action Items Update
Briefing Note re: Public Action Item #6 (Process Update – Overhoused Households)
Attachment 1

Overhoused Process

TCHC Board - Overview and Approach

February 15, 2023

Project Objectives

- Implement the revised Overhoused (OH) Process with TCHC tenants, including:
 - Bringing currently OH households into compliance with the City's rules for OH;
 - Integration with the City's RentCafe platform.
- The project will focus on:
 - Clear and proactive communication with tenants, staff, and stakeholders
 - Consistent application of the rules laid out in the Housing Services Act and the City of Toronto's RGI Manual

Definitions

Overhoused

An RGI household living in a unit with more bedrooms than they are eligible for under the Local Occupancy Standards

For example, a couple whose two children have grown up and moved out and they remain living in a three-bedroom unit

Rules

Set out in Housing Services Act and City of Toronto RGI Administration Manual

Mandatory process for 'rightsizing' a household

Fair, equitable and allows options for households to remain in communities where possible

Includes process where household is deemed ineligible for RGI if they are over-housed after the mandatory process

City Objective

City objective – optimal use of a limited resource to benefit the highest number of eligible individuals

Housholds on the TCHC Overhoused list:
~2100

17,000 households on the CWL waiting for 3+ bedroom units

Average length of time Households have been overhoused:
3170 days

"In a city with thousands of individuals and families waiting years for subsidized housing, it is vital to ensure that the people who live in RGI units are eligible to receive assistance; otherwise, people who are in need of housing assistance and on the waiting list will wait even longer when RGI units are occupied by others who are not eligible" Auditor General City of Toronto, 2019 report - *Safeguarding Rent-Geared-to-Income Assistance: Ensuring Only Eligible People Benefit*

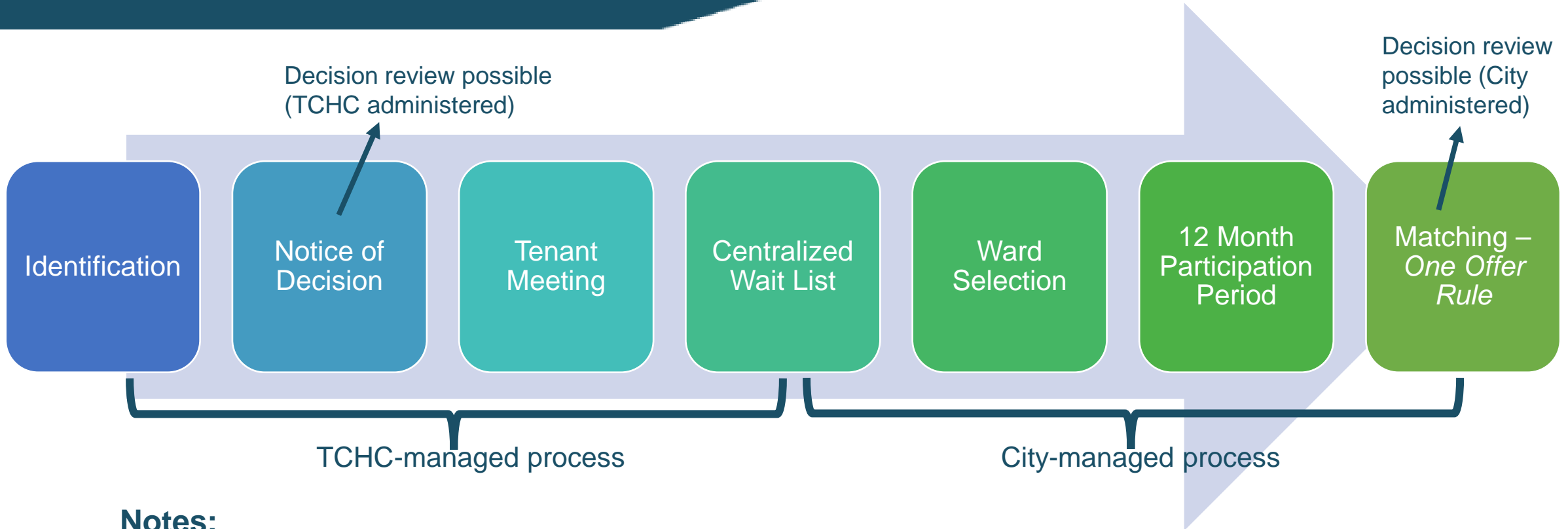
Backlog of Households

- The current backlog of OH households in TCHC's portfolio is approximately 2100
- This is a result of a number of factors including:
 - The way the previous rules were structured
 - Covid-related pause on all unit transfers
 - Implementation of the City's choice-based system
 - Implementation of the City's 'one offer rule'
- Proceeding to get all backlogged OH households into compliance is a requirement:
 - From the Service Manager
 - To free up larger units for families on the waiting list who are eligible for them
 - For responsible management of a valuable public asset in the face of a housing crisis

Previous Process

- Prior to the implementation of the choice-based system, OH households were able to choose specific buildings to transfer to
- Households sometimes chose buildings with very low turnover, resulting in no offers ever being pushed to them (sometimes over many years).
- Households also had the ability to decline three offers before affecting their RGI status
- This resulted in households remaining in OH status for many years (oldest OH cases are from early 2000s)

New Process



Notes:

- There is NO eviction specifically related to Overhoused
- Eviction does become a possibility if a household loses their subsidy, is charged market rent, and then goes into arrears
- At any point in the process a tenant can choose to pay market rent and remain in their unit

Reviews and Exceptions

- Tenants can request a decision review at two points in the process:
 - At the Notice of Decision point (review done by TCHC)
 - At the Loss of Subsidy point (review done by City – Housing Secretariat)
- Tenants may request an exception through the *Request for Additional Bedroom* process
 - Process governed by City’s RGI Administration Manual and implemented by TCHC
- Tenants may request an *Addition to the Household*
 - Process governed by City’s RGI Administration Manual and implemented by TCHC

Next Steps

- The process to clean-up this backlog has been planned in collaboration with the City and began rolling out in June 2023 with a very small pilot group (<150 households).
- The remaining households are proposed to be added to RentCafe over the next several months, beginning with the households that have been overhoused for the longest.
- All households will remain on RentCafe for 12 months before they enter the 'one-offer' stage where they could lose their subsidy.
- Extensive tenant, staff and stakeholder communications has been planned

Additional Information – TSC Discussion

- Chronological breakdown of the length of time households have been Overhoused:

Timeframe	Years Overhoused	# of Households
2021 - 2022	1 – 2 years	233
2016 – 2020	3 – 7 years	850
2011 – 2015	8 – 12 years	391
2006 – 2010	13 – 17 years	234
2001 – 2005	18 – 22 years	226
1992 – 2000	23 – 31 years	68

- 24% of households request a review of their Loss of Eligibility decision

Additional Information – TSC Discussion

- Based on the discussion at TSC, an incentive program to encourage willing households to move quickly is now under consideration. Possible incentives being explored will include:
 - Rent forgiveness
 - Coverage of moving expenses
 - Other possible incentives to be confirmed
- Planning and development work has begun, and an update can be provided to the Board at the April TSC meeting
- Proposed reporting metrics:
 - % Overhoused households activated on rent café
 - % Overhoused households participating in bidding processes on Rent Café
 - % Overhoused households who have accepted an offer of a unit that is the right size
 - % Overhoused households who are no longer overhoused

Risks

Risk	Mitigation
<p>Inconsistent messaging to tenants/ Staff not well equipped to respond to tenant issues</p>	<ul style="list-style-type: none"> - Communications plan drafted for roll-out - Training sessions scheduled with staff including complex scenario role-playing and Q&A sessions with A2H team - Ongoing check-ins planned with Supervisory teams to ensure messaging is clear and consistent
<p>Accurate Information for Stakeholders</p>	<ul style="list-style-type: none"> - Proactive communications and education planned with councillors' offices and mayor - Working collaboratively with the City on Communications planning - City and TCHC have agreement that consistency is essential and the rules will be applied consistently - Deviations from the rules in exceptional cases will only be possible with Service Manager consent
<p>Increased resource pressure related to appeals and exceptions process</p>	<ul style="list-style-type: none"> - Phased approach to roll-out will allow for monitoring of resource pressures at TCHC and City - Each phase can be extended if resource pressure exceeds what is manageable for the teams involved
<p>Potential for increased accumulation of arrears in late 2024 and into 2025</p>	<ul style="list-style-type: none"> - Working with Service Manager to identify possible solutions post-conclusion of roll-out to manage a potential increase in Loss of Subsidy cases resulting in arrears accumulation



Thank you.
Do you have any questions?