



February 18, 2022

Hon. Steve Clark
Minister of Municipal Affairs and Housing
17th floor
777 Bay Street.
Toronto, Ontario, M5G 2E5

Re: OMSSA Community Housing Renewal Regulations Response

Dear Minister Clark,

The Ontario Municipal Social Services Association (OMSSA) is a non-profit association whose members are Ontario's Consolidated Municipal Service Managers (CMSMs) and District Social Services Administration Boards (DSSABs). In Ontario, community housing and homelessness prevention programs are co-funded, planned and administered by 47 Service System Managers. Community housing is housing owned and operated by non-profit housing corporations, housing co-operatives and the 47 Municipal Service Managers. These providers offer subsidized or low-end-of market rent housing sometimes referred to as community housing, social housing, and affordable housing.

OMSSA members have enjoyed a close relationship with the Ministry of Municipal Affairs and Housing (MMAH) and have been closely engaging with the province on Community Housing Renewal through confidential provincial-municipal technical tables and sub-committees. OMSSA members appreciate the opportunity to consult on other related initiatives including the Supportive Housing Renewal, Housing Supply Action Plan, Homelessness Enumeration Counts and the Social Services Relief Fund and encourage continued dialogue on these initiative with all 47 Service System Managers and existing provincial-municipal technical tables.

On December 18, MMAH posted Regulation 367/11 under the *Housing Services Act, 2011*. OMSSA generally supports the posted regulatory amendments and objectives of the Community Housing Renewal Strategy.

Through provincial-municipal tables and sub-committees, our members have provided specific, detailed recommendations on Service Agreements, Service Level Standards and Local Access Rules. OMSSA stands by those recommendations and wishes to continue further dialogue while imploring the province to move forward on the Community Housing Renewal Strategy.

Local Access Rules:

OMSSA does not see a significant problem with system navigation and does not support overly prescriptive regulations as a solution to addressing long waiting lists and wait times.

Currently, demand far exceeds supply and there are repair backlogs outstanding in all service manager areas. There is also a need for the province to increase funding towards supportive and transitional housing with appropriate wrap-around supports to ensure successful tenancies once housed. Current special needs housing rules in the HSA should also be reviewed, as should designated special needs housing providers under the HSA to ensure that they reflect current circumstances and processes across service areas.

Flexibility is required at the local level to meet unique community challenges and to encourage innovative approaches to service planning and delivery. Municipal Service System Managers should be afforded full flexibility to determine the appropriate integrated access system within their service areas based on local need and circumstances consistent with their 10-year Housing and Homelessness Plans.

OMSSA supports maximum service system manager flexibility around local access rules and a flexible approach to innovate and meet unique local circumstances in urban, suburban, rural, and Northern municipalities across Ontario. Service Managers should retain the ability to set their own eligibility rules relating to income, asset limits, maximum absence time from units and be able to set their own local priority categories based on local needs. The community housing system needs simplification and less rules overall.

Service Level Standards:

OMSSA and the province of Ontario recognizes that many of the 47 Service System Managers contribute municipal dollars and offer a wide range of programs and subsidies that are currently not counted towards service level standards. To achieve maximum outcomes, improve choice, increase access and to serve those most in need, the province should encourage flexibility and innovation within the community housing system to serve as many individuals as possible.

OMSSA encourages MMAH to collect an inventory of locally administered and funded housing subsidy programs that improve affordability from all 47 Ontario service system managers. There should be no minimum baselines or depth of subsidy requirements.

While OMSSA respects the provincial role in determining service level standards, Ministerial approval should not be required for new forms of housing assistance. Instead, parameters should be set broadly with flexibility to address local needs. Consideration should be given to an outcomes-based approach and maximum flexibility around local portable housing benefits in addition to rent-geared-to-income units.



Municipalities are required to submit 10-year housing and homelessness plans to the province that are approved and accountable to elected Councils and to DSSAB boards. Municipal contributions should be fully recognized, and a broad range of programs should be considered to allow for flexibility, innovation, and unique local circumstances.

Service Agreements:

Housing providers are critical and valued partners within the community housing system in Ontario. OMSSA members are committed to supporting and maintaining the viability of housing provider partners and keeping units in good repair and within the community housing system.

OMSSA's Board of Directors previously approved and submitted to MMAH a detailed paper outlining our members position on End of Mortgage and the *Housing Services Act* funding formula. Service Managers should be able to address the capital needs to sustain the system and address other housing and homelessness needs, but not if housing providers are overfunded under any proposed new funding model for Part VII.1 projects. Provincial regulations should not prescribe how municipal investments and cost savings are used. Each Service Manager must have sole discretion to negotiate financial incentives with individual housing providers through flexible and voluntary agreements. Service Managers will act in good faith as a sector to reinvest mortgage savings following the priorities established in this paper, as consistently as possible and in line with the priorities and targets set out in local housing and homelessness plans..

The regulations must provide very broad, minimal provisions for Service Agreements between municipal Service Managers and community housing providers affording the ability to come to service (partnership) agreements that meet local needs and circumstances. This should include baseline provisions for municipal funding commitments for housing providers that are reasonable to maintain their viability, but not in an overly prescriptive manner that does not provide sufficient flexibility to effectively manage projects in municipal community housing portfolios.

It is critical, appropriate, and principled that both the provincial and federal governments must continue their respective contributions to help keep buildings in a good state of repair suitable for occupancy and a good quality of life.

Changes to provincial regulations must be cost neutral for municipalities. A flexible, local approach is needed to ensure the community housing system is sustainable, well maintained, and can address growing needs.

As funders of the system, Service Managers must have discretion to negotiate financial incentives and operating obligations in the way that best meets their local needs. A flexible outcomes-based framework for Service Agreements will allow Service Managers to maintain critical relationships with existing providers and to enter into agreements with new ones.



An exit agreement must consider meeting service level standards, and local municipal supply and demand needs, as defined in any 10-year housing and homelessness plan. Any exit agreements should also be approved by CMSMs and DSSABs.

All efforts should be made to avoid units from exiting the system unless sold for the purposes of creating new units and generating increased capacity. Service Managers are not interested in reducing funding within the community housing system.

OMSSA members are accountable to service level standards, the *Housing Services Act* and local 10-year housing and homelessness plans. We support a government-to-government approach to continuing discussions with the province on negotiating new service agreements with housing providers to meet service level standards and avoid units exiting the system.

There is recognition that new funding is needed to increase supply and maintain existing units. To address growing demand, wait lists and repair backlogs, all governments have a role to play in terms of funding to ensure existing units are maintained in good repair and that new capacity can be built to address growing demand across Ontario.

Continued Dialogue:

OMSSA members appreciate the opportunity to provide consultation on the proposed regulation amendments related to the Community Housing Renewal Strategy. OMSSA and its members look forward to continued dialogue and partnership with the Ministry of Municipal Affairs and Housing, Canada Mortgage and Housing Corporation and housing provider organizations to move forward on this initiative together.

Sincerely,

Cathy Cousins
President,
Ontario Municipal Social Services Association

Doug Ball
Executive Director
Ontario Municipal Social Services Association