

Report to Community and Protective Services Committee

To: Chair and Members
Community and Protective Services Committee

From: Scott Mathers MPA, P.Eng.
Deputy City Manager, Planning and Economic
Development

Subject: Inter Faith Homes (London) Transition Strategy: Appointment
of London-Middlesex Community Housing

Date: August 15, 2023

Recommendation

That, on the recommendation of the Deputy City Manager, Planning and Economic Development:

- a. the attached proposed by-law (Appendix "A") BE INTRODUCED at the Municipal Council meeting on August 29, 2023 to:
 - i. Delegate to the Deputy City Manager, Planning and Economic Development, or their written designate, the authority to perform all of the duties and exercise all of the powers of the City as service manager under the Act with respect to designated housing projects and transferred housing programs in accordance with the *Housing Services Act, 2011*, S.O 2001, c. 6. Sched. 1 ("Act") and policies and directives issued by the Minister of Municipal Affairs and Housing applicable to service managers under the Act.
 - ii. Delegate to the Deputy City Manager, Planning and Economic Development, or their written designate, the authority to approve and execute agreements necessary to carry out the authority to perform all of the duties and exercise all of the powers of the City as service manager under the Act, excepting exit agreements and service agreements under the Act.
- b. The following information on Civic Administration's approach for the Inter Faith Homes (London) Transition Strategy BE RECEIVED;
- c. That Council, in its capacity as Service Manager under the *Housing Services Act, 2011*, AUTHORIZE the Deputy City Manager, Planning and Economic Development, or their written designate, to:
 - i. exercise any of the remedies available to the service manager under the *Housing Services Act, 2011* in connection with the resignation of the board of directors for Inter Faith Homes (London) or a triggering event under the *Housing Services Act, 2011*;
 - ii. authorize the Deputy City Manager, Planning and Economic Development, or their written designate, to approve and execute any agreements required to exercise any of the remedies available to the service manager under the *Housing Services Act, 2011* in connection with the resignation of the board of directors for Inter Faith Homes (London) or a triggering event under the *Housing Services Act, 2011*.
- d. That Council, in its capacity as Service Manager under the *Housing Services Act, 2011* authorize the Deputy City Manager, Planning and Economic Development to authorize the appointment of City staff to act as an interim Board of Directors for Inter Faith Homes (London);
- e. That, the Deputy City Manager, Planning and Economic Development, or their written designate, BE AUTHORIZED to undertake all the administrative acts that

are required under the *Housing Services Act, 2011* in connection with the Inter Faith Homes (London) Transition Strategy.

Executive Summary

Inter Faith Homes (London) is a 64-unit townhouse development in the City of London. The home were built in 1964 and was acquired in the late 1980's by Inter Faith Homes Group and incorporated as Inter Faith Homes (London) corporation. The project was transferred to the City of London in 2001/2002 as part of the social housing provincial download to the municipality. Currently governed under the *Housing Services Act, 2011* (the 'Act'), Inter Faith Homes (London) is identified as a designated Part VII housing project and more specifically as a Program (6) Housing Project in Ontario Reg. 368/11.

Inter Faith Homes (London) receives subsidy from the City of London in accordance with the Act which is a benchmark funding formula which helps to offset operating costs (including mortgage costs and property tax costs) and provides RGI subsidy for households eligible for RGI assistance.

In May 2023, Board of Directors of Inter Faith Homes (London) resolved that they could no longer provide governance oversight and issued communication to the City of London that they will be stepping down effective immediately. Through conversations with the Board of Directors of Inter Faith Homes (London), they agreed to continue their duties until August 31, 2023, at which time the Board expects to transfer governance through the appointment of new board members.

In June the City issued a Triggering Event notice to Inter Faith Homes (London) and a Project in Difficulty (PID) notice to the Ministry of Municipal Affairs and Housing outlining these events and concerns. Both these notices indicated that the above situation met the definition of a 'project-in-difficulty' under the Act and that the City, in its capacity as Service Manager under the Act, would exercise remedies to help restore stability to the organization and preserve the housing asset while developing a long-term plan for Ladybrook.

Civic Administration is working with London-Middlesex Community Housing to address the short-term needs of the Ladybrook site until a new local Board can be established.

Linkage to the Corporate Strategic Plan

Council and staff continue to recognize the importance of actions to support housing, as reflected in the 2023-2027 - Strategic Plan for the City of London. Specifically, the efforts described in this report address the following Areas of Focus, including:

- Housing and Homelessness
- Well-Run City

Housing and Homelessness Strategic Area of Focus:

The following strategies are intended to "Increase access to a range of quality, affordable, and supportive housing options that meet the unique needs of Londoners":

- Align policies and programs recognizing the broad range of factors that contribute to accessing and maintaining transitional, supportive, community, affordable and market housing.

The following strategies are intended to Decrease the number of Londoners at risk of or experiencing homelessness:

- Implement a program of continuous review of policies, procedures, and by-laws to create accountability and opportunities for balanced and compassionate solutions to homelessness.

Well-Run City Strategic Area of Focus:

The following strategies are intended for Londoners to have trust and confidence in their municipal government:

- Increase transparency and accountability in decision making, financial expenditures, and the delivery of municipal programs and services.

Analysis

1.0 Discussion and Considerations

1.1 Previous Report Related to this Matter

- [CPSC - February 1, 2022, Agenda Item #2.3 – End of Mortgage \(EOM\) and End of Operating Agreement \(EOA\) Impacts and Analysis](#)

1.2 Background

In June 2020, Inter Faith Homes (London) submitted a business case to the City outlining several financial concerns and that the Ladybrook housing project is not financially sustainable under the current funding formula. The business case requested an increase to subsidy of approximately \$100,000 per year over the next 10 years. Inter Faith Homes (London) continued to advocate that they want to help the City meet its goals including protecting affordable housing stock, helping ensure the long-term sustainability of community housing (social housing) providers and ensuring the availability of subsidized housing for London residents. Since June 2020, the Municipal Housing team has continued to work with Inter Faith Homes' (London) administration to address the various components of the business case.

In an effort to support Inter Faith Homes' (London) long-term sustainability, the Municipal Housing Development team committed to conducting a full operational review of their operations with the goal of highlighting strengths, opportunities, and areas of risk to provide useful information to assist the Board in making future decisions towards financial viability (Appendix "B"). The operational review was also intended to highlight areas for potential future support from the Service Manager. The operational review was completed in April 2022. Unfortunately, a number of significant issues remain outstanding or have since occurred since the operational review.

In May 2023, Inter Faith Homes (London) was forecasting a minor net income of approximately \$11,000, cashflow deficit of approximately \$36,000 (largely due to uncollectable rental revenue and past subsidy recoveries due to the Service Manager), informed Municipal Housing that they have depleted their capital reserve, and provided notice of the Board's decision to resign as Directors of Inter Faith Homes (London).

1.3 Operating Challenges

The Ladybrook housing project is not financially sustainable under the current financial situation. The following table highlights the financial activities of Ladybrook over the last few years. The amounts below are based on the audited financial statements and the City's Annual Reconciliation review (AIR):

Table 1: Ladybrook Financial Activities

	2018/19 (AIR)	2019/20 (AIR)	2020-21 (AIR)	2021-22 (financial statement)
Revenues				
Rental Income	\$316,313	\$340,409	\$405,871	\$442,663
Subsidy Entitlement	365,937	\$352,603	324,700	\$327,614
Other	\$3,017	\$1,697	62,272	2,665
Total Revenues	\$685,267	\$694,709	\$792,843	\$772,942
Expenses				
Operating	\$324,799	\$398,312	\$407,616	\$409,716
Property Taxes	136,300	137,283	141,506	145,028
Mortgage (Principal & Interest)	227,257	227,041	227,041	232,195
Total Expenses	\$688,356	\$762,636	\$839,163	786,939
Net Income (loss)	(\$3,089)	(\$67,927)	(\$46,320)	(\$13,997)
Accumulated Operating Income (loss)	\$24,720	(\$43,207)	(\$89,527)	(\$105,254)
Capital Reserve	\$427,210	\$398,652	\$370,201	\$350,458

To assist with the ongoing operational challenges, through its delegated authority as Service Manager, supported by community housing programs funded by the Provincial government, the City has:

- Provided a two-month advance on subsidy payments.
- Deferred three years of subsidy recoveries.
- Provided additional operating subsidy payments of \$60,000 in 2021 and another \$40,000 in 2023.
- Granted capital funding to support building repairs.
 - \$195,000 in 2016 for Replacement of Patio/Balcony Doors, Front Landings, Electrical Upgrades
 - \$219,000 in 2020 for Additional Patio Doors, Tree Pruning & Removal, Concrete Landings and Stair Repairs
 - \$192,000 in 2021 for Roof Replacement

1.4 Purpose

The purpose of this report is to formally designate the Deputy City Manager, Planning and Economic Development, or their written designate, to act in the capacity of Service Manager as it pertains to the *Housing Services Act, 2011* administrative responsibilities, to inform council on the recent events regarding a housing project in difficulty and provide an update on Civic Administration's strategic transitional management plan for this housing project.

The proposed delegation will:

- Grant authority to the Deputy City Manager, or designate, to
 - Act as the Service Manager for the purposes of administering the City's responsibilities under the Housing Services Act,
 - Improve the administrative effort and efficiency in the administration of the City's Housing Services Act responsibilities.

2.0 Key Issues and Considerations

2.1 Preferred Approach

In review of the options below, the preferred approach is to work with the directors of London-Middlesex Community Housing to assume interim board of director responsibilities and maintain operations of Inter Faith Homes (London) while Civic Administration continues to identify local community board members.

To support the preferred approach, Civic Administration has identified an action plan that will be implemented to address Short-term, Medium-term, and Long-term objectives. As necessary and throughout the process, the plan may be revised to reflect changing needs and/or other considerations.

2.2 Rationale for Preferred Approach

In reviewing the available options, Civic Administration has considered the following items:

Community Housing Experience

It was important to Civic Administration that the short-term plan included board members who have been on a board of an organization that had experience with the administration of the ACT, community housing tenant management, property management and financial management. Working with the directors of the board of LMCH provides the opportunity to work with individuals experienced in managing the necessary requirements with a community housing project which focuses on providing a seamless transition for the residents of the property.

Resident Engagement

As part of Civic Administration's transition plan, a resident communication strategy was developed with Corporate Communications which includes information handouts for residents, building posters, drop-in info sessions, and contact information. Ongoing information/communication updates will be provided to residents throughout the transition process.

This transition plan will not impact any current resident's housing situation (either market or RGI households). Tenants will still be required to adhere to their existing lease agreements and RGI eligibility requirements.

Financial Obligations

Municipal Housing division, acting as the Service Manager, will continue to review the financial requirements of the project and will continue to provide operational financial support and capital funding from the provincial Canada-Ontario Community Housing Initiative program funding and the City's Social Housing Reserve fund (which is intended for major capital repairs and upgrades to maintain existing social housing units) as available.

Immediate Action

The decision by the Inter Faith Board was made official through resolution in May 2023. Civic Administration has limited options with which to proceed prior to the pending August 31, 2023 date when the existing Board officially resigns. Immediate action is required to support the tenants and the organization through this period and ensure that housing is maintained.

3.0 Financial Considerations

Civic Administration, acting as the Service Manager, will continue to review the financial requirements of the project and provide operational financial support within existing base

budget funding levels. Capital funding opportunities will be explored and funded through the provincial Canada-Ontario Community Housing Initiative program funding (100% provincial funding) and the City's Social Housing Reserve fund (which is intended for major capital repairs and upgrades to maintain existing social housing units).

If the interim receiver and manager option is implemented, it is expected to cost approximately \$30,000/month. And although, as per the *Housing Services Act*, the interim receiver costs are the responsibility of the community housing provider, given the depleted financial position, the funding would initially need to be provided by the City as the Service Manager.

4.0 Next Steps

4.1 Short-term Plan

Civic Administration will work with LMCH board of directors on their appointment to the board of Inter Faith (London).

Civic Administration will continue to seek out community board members for consideration for the permanent replacement of the interim board members of Inter Faith Homes (London).

Municipal Housing Development, acting as the Service Manager, will continue to review the financial requirements of the project and continue to provide operational financial support and capital funding. Through the Canada-Ontario Community Housing Initiative program funding and the City's Social Housing Reserve fund (which is intended for major capital repairs and upgrades to maintain existing social housing units), these needs can be met.

4.2 Medium-term Plan

Civic Administration will continue to seek out community board members for consideration for the permanent replacement of the interim LMCH board members of Inter Faith Homes (London).

Inter Faith Homes' (London) current mortgage is set to expire November 1, 2024, at which time, the organization is required to enter into a new service or exit agreement with the Service Manager as per current Act requirements.

When the project reaches their End of Mortgage, the legislative framework provides opportunities for the organization to enter into a New Services Agreement with the Service Manager and renegotiate within a new regulatory funding model. This provides the opportunity to advance redevelopment plans which could lead to a more financially sustainable project.

The MHD team is committed to supporting this project in redevelopment activities and preliminary design concepts based on the neighbourhood context and planning framework.

The intent is that a new permanent board of directors for Inter Faith Homes (London) is established to advance the organization through the redevelopment and service agreement process.

4.3 Long-term Plan

The long-term plan involves having a permanent locally populated community board established with a focus of redevelopment and a new housing service agreement in place to promote future financial stability, and a property that is well managed for the residents that call this community home.

Conclusion

In May 2023, Inter Faith Homes (London) board provided notice to the Service Manager of their resignation from the community housing project and have subsequently agreed to continue operations until August 31, 2023.

As a result, Civic Administration is recommending that the directors of the board of the London-Middlesex Community Housing be appointed to the board.

Civic administration will continue to work with the new temporary directors of the board of Inter Faith (London) in the medium-term and long-term needs to address continued daily operations, current financial pressures, organizational governance, tenant's housing stability, and future financial stability.

Prepared by:	Dave Purdy, Manager of Municipal Housing
Submitted by	Matt Feldberg, MPA, CET Director, Municipal Housing Development
Recommended by:	Scott Mathers, MPA, P.Eng. Deputy City Manager, Planning and Economic Development

Attached:

Appendix 'A' – Bylaw
Appendix 'B' – Operational Review

Appendix “A” – Bylaw

Bill No.

By-Law No.

A by-law to delegate the Deputy City Manager, Planning and Economic Development, or their written designate, the authority to perform all of the duties and exercise all of the powers of the City as service manager under the *Housing Services Act, 2011*

WHEREAS pursuant to Ontario Regulation 367/11, The Corporation of the City of London is a designated service manager under the *Housing Services Act, 2011*, S.O. 2011, c. 6, Sched. 1 (*Housing Services Act, 2011*);

AND WHEREAS pursuant to section 17 of the *Housing Services Act, 2011*, a service manager may, in writing, delegate all or some of its powers and duties under the Act to all or part of its service area;

AND WHEREAS subsection 5(3) of the *Municipal Act, 2001* provides that a municipal power shall be exercised by by-law;

AND WHEREAS Municipal Council of The Corporation of the City of London deems it appropriate to delegate its powers and duties under the *Housing Services Act, 2011* to the Deputy City Manager, Planning and Economic Development or their written designate;

NOW THEREFORE the Municipal Council of The Corporation of the City of London enacts as follows:

1. The Deputy City Manager, Planning and Economic Development, or their written designate, is delegated the authority to perform all of the duties and exercise all of the powers of The Corporation of the City of London as service manager under the *Housing Services Act, 2011* with respect to designated housing projects and transferred housing programs in accordance with the *Housing Services Act, 2011* and policies and directives issued by the Minister of Municipal Affairs and Housing applicable to service managers under the *Housing Services Act, 2011*.
2. The Deputy City Manager, Planning and Economic Development, or their written designate, is delegated the authority to approve and execute agreements necessary to carry out the authority to perform all of the duties and exercise all of the powers of the City as service manager under the Act with respect to designated housing projects and transferred housing programs. This delegation of authority does not include the authority to approve exit agreements and service agreements under the *Housing Services Act, 2011*.
3. This by-law comes into effect on the day it is passed subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

Passed in Open Council on [insert date] subject to the provisions of Part VI.1 of the *Municipal Act, 2001*.

Josh Morgan
Mayor

Michael Schulthess
City Clerk

First reading -
Second reading -
Third reading -

Appendix “B”

Operational Review Committee Report – Inter Faith Homes (London)

Executive Summary

Date: April 29, 2022

Overview

Inter Faith Homes (London) submitted a business case to the City of London as the Service Manager back in June 2020, which identified several areas for review. Since that time, the Municipal Housing team has continued to work with Birch Housing’s administration to address the various components of the business case.

As a result of the Municipal Housing team’s review of the operational needs highlighted within the business case, a one-time subsidy supplement of \$60,000 was approved in May 2021 as an immediate relief to alleviate the urgent operational financial pressures.

In an effort to support Inter Faith Homes’ (London) long-term sustainability, the Municipal Housing team committed to conducting a full operational review of Inter Faith Homes’ (London) operations with the goal of highlighting strengths, opportunities, and areas of risk to highlight useful information to assist the Board in making future decisions towards financial viability. The operational review is also intended to highlight areas for potential future support from the Service Manager.

The operational review started in June 2021 and took several months to review the documentation received, ask follow-up questions, receive supplementary documentation, document our findings and review internally.

During the time of our review, Birch Housing administration reached out to the Municipal Housing team in November 2021 to provide an update on Inter Faith Homes’ (London) cash flow situation which projected a May 2022 deficit of approximately \$30,000. As an immediate relief, the Municipal Housing team temporarily paused the projected subsidy claw-backs from the two outstanding Annual Information Returns (AIR’s) for 2019 and 2020 which essentially offsets the projected May 2022 deficit.

Although Inter Faith Homes (London) has continued to struggle financially, while working with the administration of Birch Housing, there have been many positive activities worth highlighting:

1. Inter Faith Homes London has been extremely engaged in the Municipal Housing team’s capital investment program and has been successful in securing significant capital investment for necessary capital repairs;
2. Inter Faith Homes London has explored other funding options like the Green Municipal Fund initiative;
3. Has engaged the Service Manager with financial challenges; and
4. More recently, adjusting rental rates to address revenue challenges.

While this report completes the last stage of our operational review, it does not complete the journey.

The following provides an overview of specific aspects of the operational review.

Operational Review

1. Review Purpose & Scope

The purpose of the Operational Review is to assist Inter Faith Homes (London), in meeting the requirements of the *Housing Services Act, 2011*, Local Rules and Service Agreement. The operational review is intended to identify areas in which Inter Faith Homes (London) is successfully meeting the requirements of the legislation as well as areas which present opportunities for improvement. Inter Faith Homes (London) is responsible for implementing and ensuring compliance with any governmental legislative requirements.

The scope of the report summarizes findings and recommendations in relation to:

- Administration & Governance
- Maintenance & Capital Planning
- Financial Management & Controls

The summary below is only a subset of findings and recommendations that are deemed a priority to be addressed in the short term. Please review the comprehensive Operational Review Report for a complete summary of all other findings and recommendations.

2. Key Findings & Recommendations

a. Governance

Our review has found that Inter Faith Homes (London) has a functioning board with appropriate training and sound succession planning in place. For the Board to effectively meet its fiduciary duties, they must be able to provide effective oversight of the management and administration of the organization's day-to-day operations. As Inter Faith Home (London) is a complex organization with multiple projects, it's important that the information provided and reviewed by the board is relevant and specific to each operating location.

Finding	Recommendation	Priority Level (H/M/L)
Reports to Board of Directors There was no evidence that certain monthly reports such as monthly financial reports, rental arrears, vacancy, capital & maintenance reports contain details specific to each operating region i.e., Inter Faith (London). This can result in important regional information not being identified timely and actioned on. It was noted that certain reports are going to sub-committees, however there was no evidence that these reports are being received by the board.	1. The board needs to receive key reports specific to Inter Faith (London). Key issues and opportunities should be identified and proactively managed.	Medium
Managing & Filling Vacancies Loss in revenue resulting from vacant units can have a material impact on the organization's ability to fund day-to-day operational needs. For the 12 months ending May 31, 2021,	1. Ensure that vacancy reports are reviewed monthly, and actions are identified to remediate the issue.	High

<p>Inter Faith (London) experienced 23 vacancy months resulting in a loss revenue of approximately \$18,000.</p> <p>It is also important for Inter Faith (London) to take reasonable efforts to meet their service level obligations for RGI targets. As of May 31, 2021, Inter Faith (London) was 6 units below the mandated RGI target of 47.</p>	<ol style="list-style-type: none"> 2. Engage with the Municipal Housing Division to discuss solutions and options to address any challenges that cannot be adequately addressed (i.e., contractor sourcing, restoration costs, etc.). 3. Fill vacant units according to Inter Faith's (London) RGI and Market targets. 	
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b. Capital Management

Based on review of documents and physical inspection, Inter Faith (London) is generally compliant in most areas due to maintenance and repair work that started in 2020. Although some of these repairs & maintenance should have been addressed in prior years, the initiative is commended. The Service Manager also recognizes the time and effort that staff have put into securing additional capital funding in both 2020/21 and 2021/2022 for various capital repairs.

Finding	Recommendation	Priority Level (H/M/L)
<p>Protect Capital Assets Based on our review, certain routine repairs, and maintenance (i.e., electrical and fire alarm replacements) may not have been carried out annually. However, the Service Manager recognizes that Inter Faith (London) has made commendable efforts and progress in catching up on overdue projects.</p> <p>Our review suggests that past irregular maintenance and repair schedules contributed to a small increase in operating costs for 2021. Costs aside, the Service Manager wants to emphasize that attention given to scheduling regular repairs and maintenance will help ensure the long-term sustainability of buildings and structures.</p>	<ol style="list-style-type: none"> 1. Continued attention to routine repairs and maintenance by assessing the current state of capital and identifying scope of work needed, related costs, and timing of repairs. 2. Engage with the Municipal Housing Division to highlight areas of concern and explore options. 	High
<p>Legislated Safety Requirements The board of directors has an obligation to ensure that the organization is in compliance with government mandates and regulations. As it relates to buildings and structures, many policies are in place to protect workers and tenants. As such, it is imperative that Inter Faith</p>	<ol style="list-style-type: none"> 1. Provide supporting documentation that the Asbestos Management plan is implemented and maintained in accordance with the Occupational Health & Safety Act. 2. Provide evidence or verification that Material 	High

<p>(London) takes action to ensure that standards are being met.</p> <p>Based on our review, there was no evidence of an Asbestos Management Plan or available Material Safety Data Sheets.</p>	<p>Safety Data Sheets are available on-site for staff.</p>	
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c. Financial Management

Our review identified certain aspects of financial management that are causes for concern. As a non-profit organization, it becomes increasingly important to understand drivers behind monthly and annual variances in Revenues and Expenses. Identifying the causes behind these variances will enable management (i.e., the Board of Directors) to make decisions that may alleviate the financial impact and challenges.

Finding	Recommendation	Priority Level (H/M/L)
<p>Financial Reporting to Board of Directors Based on a sampling of Board meeting minutes, there is no clear evidence that the Board is receiving monthly financial reports for review and decision making.</p>	<ol style="list-style-type: none"> 1. Monthly financial reports, identifying key revenue and expense variances, trending analysis, and identification of risks & opportunities should be analyzed monthly and provided to the board for review. 2. Corrective actions should be identified and implemented proactively. 	<p>Medium</p>
<p>Property Administration Overhead For the purposes of this analysis, administration overhead includes: Asset Management Fee, Property Management fee, and On-Site Building Attendant costs.</p> <p>For year ending 2021, total Property Administration Overhead represent approximately 20% of revenues or \$140,000.</p> <p>Based on our review of other properties, with comparable market/RGI mix, the Asset Management component is unique to this property and represents approximately 8% of revenues or \$56,000.</p> <p>From our review, it is unclear if the Board developed plans to</p>	<ol style="list-style-type: none"> 1. Property Administration Overhead costs should be reviewed to ensure this cost can be managed within the operational budget. 2. Any new expenses should be evaluated against the operational budget to ensure that it is funded. 	<p>High</p>

<p>absorb or offset this additional cost.</p>		
<p>HST Rebate Submissions Service Manager capital investments have significantly increased over the last few years creating the recovery of larger than normal HST rebates.</p>	<ol style="list-style-type: none"> 1. Submitting semi-annual HST rebate submissions will have a direct positive impact on cashflow. 2. Engage the Service Manager to identify solutions to minimize the cashflow impact caused by the timing of the HST rebate. 	<p>High</p>
<p>Bad Debts The bad debts expense has increased significantly and remained high in the last few years.</p> <p>This represents an important source of revenue stream and managing this to reasonable levels should be prioritized.</p> <p>Recognizing that our review covered the period of the pandemic, this has been identified for ongoing monitoring.</p> <p>From our review, it is unclear if the Board receives monthly Bad Debts reports.</p>	<ol style="list-style-type: none"> 1. Board needs to receive monthly Bad Debts reports to review and identify any risks & opportunities. 2. Management should action and regularly review the arrears data and implement corrective actions allowed under existing policies. 3. Referral to Housing Stability Table for RGI tenants at risk of eviction especially due to rental arrears. 4. Engaging the Service Manager for RGI tenant issues for support. 	<p>Medium</p>