

Report to Community and Protective Services Committee

To: Chair and Members, Community and Protective Services Committee
From: Kevin Dickins, Deputy City Manager, Social and Health Development
Subject: Housing Stability Services – Rent-Geared-to-Income (RGI) Waitlist Placement Ratio
Date: October 24, 2023

Recommendation

That, on the recommendation of the Deputy City Manager, Social and Health Development, that the Housing Stability Services – Rent-Geared-to-Income (RGI) Waitlist Placement Ratio report; that the following actions **BE TAKEN** with respect to this report, that;

- A) the report **BE RECEIVED** for information purposes,
- B) Civic Administration **BE AUTHORIZED** to implement a new temporary housing placement rate of 20% urgent status households, 80% needs and chronological waitlist households,
- C) Civic Administration **BE AUTHORIZED** to temporarily implement a requirement that households applying for Urgent Status on the waitlist have lived in London-Middlesex for at least 6 months in order to be eligible for Urgent Status, except Urgent Medical Status when relocation for medical treatment is required, and
- D) Civic Administration **BE DIRECTED** to report back on findings and recommendations of the RGI Waitlist Review no later than Q2 2024.

Executive Summary

Civic Administration undertook a consultation process to solicit feedback on the current housing placement ratios used for specific housing placements. The *City of London: Housing Waitlist Review – What We Heard* report from the Consultation sessions, September 2023, attached as Appendix B to this report, outlines a pressing need to temporarily suspend two current practices related to Rent Geared to Income (RGI) waitlist applicants with Urgent Status. These practices are noted below. The objective of this initial review is to provide recommendations and strategies to improve outcomes for those in need of housing, housing providers, residents of community housing buildings and the broader community.

London's local rule, Housing Division Notice (HDN) #256 attached as Appendix A to this report, notes that Housing Providers must ensure that, 90% of placements be from households in the Urgent category and 10% be from the Chronological category. Chronological applications are those which do not have any priority over others and are housed in the order which they apply.

Implemented in 2005, the current housing ratio has led to significant concerns among various community members, housing providers, and others. Preliminary findings from initial consultations reveal several challenges, including a lack of support resources and negative impacts to both RGI community housing buildings and surrounding communities.

Urgent Medical, Urgent Social, and Urgent Homeless status applications from outside of London- Middlesex make up 28% of the 1610 households on the RGI waitlist. It is proposed that the intent of Urgent Status on the RGI waitlist be to prioritize assistance to those in most need in the Service Manager area of London-Middlesex. The only exception to this is when a household is deemed eligible for Urgent Medical status because they must relocate to London for medical treatment.

The proposed changes are designed to temporarily mitigate the negative outcomes noted in the attached report and more quickly meet the needs of local households on the RGI waitlist. The future state will be guided by a comprehensive review, which is scheduled to conclude at the end of January 2023. A final, more comprehensive report and proposed plan will be presented to a Community and Protective Services Committee meeting by end of Q2 2024.

Linkage to the Corporate Strategic Plan

2023-2027 Strategic Plan for the City of London

Strategic Area of Focus: Housing and Homelessness

Outcome 1: The City of London demonstrates leadership and builds partnerships to increase quality, affordable, and supportive housing options.

Expected Results: 1.1 Increased access to a range of quality, affordable, and supportive housing options.

- Align policies and programs recognizing the broad range of factors that contribute to accessing and maintaining transitional, supportive, community, affordable and market housing.
- Address the specific needs of populations, including equity-denied groups, and prioritize housing initiatives that are affordable

Outcome 2: London has a robust community system of health, homelessness, housing stability services, policies, procedures and by-laws in place to support individuals and families at of or experiencing homelessness or in precarious housing consistent with Council's recognition of the health and homelessness emergency.

Expected Results: 2.1: Decreased number of Londoners at risk of or experiencing homelessness.

- Implement the whole-of-community system response to the health and homelessness crisis that creates pathways to housing.
- Work collaboratively across sectors to identify and prevent individuals and families at risk of homelessness from experiencing homelessness.

Expected Results: 2.2 Improved quality and safety in social housing

- Work collaboratively across sectors to improve safety of individuals and families living in social housing.
- Address the specific safety needs of populations, including equity denied groups, living in social housing.
- Support improvements to policies and programs in the delivery of both responsive and preventative safety services throughout the social housing sector.
- Increase responsiveness to tenant complaints and feedback about housing conditions.

Strategic Area of Focus: Economic growth

Outcome 1: London encourages equitable economic growth and diversification.

Expected Results: 1.1 Small and growing businesses, entrepreneurs and non-profits are supported to be successful.

Housing Stability for All: The Housing Stability Action Plan for the City of London (2019-2024)

London's Homeless Prevention and Housing Plan, Housing Stability for All: The Housing Stability Action Plan for the City of London (Housing Stability for All Plan), is the approved guiding document for homeless prevention and housing in the City of London and was developed in consultation with Londoners.

Strategic Initiative 2.2: Revitalize and modernize community housing.

- 2.2.a. Regenerate London Middlesex Community Housing and other social or community housing sites, maintaining affordability, ensuring long-term stability, and including more housing options.

Strategic Initiative 3.1: Help individuals and families access housing stability services and solutions that best meet their needs.

- 3.1.d. Revise the current locally-driven eligibility rules and priority systems for social and affordable housing to better reflect need.

Strategic Initiative 3.3: Support movement and choice within a range of housing options and services based on the needs and interests of individuals and families.

- 3.3.a. Work with individuals and families to determine their support needs and expand programs that assist them in moving towards their housing goals.
- 3.3.b. Support housing providers to help tenants reach their community of choice.

Analysis

1.0 Background Information

1.1 Previous Reports Related to this Matter

- London and Middlesex Community Housing – 2022 Annual General Meeting of the Shareholder Annual Resolutions – (SPPC: June 20, 2023)
- Alignment of Rent Supplement and Housing Allowance Programs (CPSC: October 4, 2023)

2.0 Discussion and Considerations

2.1 Purpose

The purpose of this report is to seek Council approval for Civic Administration to temporarily suspend, up to 1 year, the existing placement ratio of nine (9) Urgent Status Households to everyone (1) high needs income and chronological household being housed. To seek Council approval to implement a temporary ratio of two (2) urgent households to every eight (8) high needs income and chronological households, while a review is completed and recommendations for next steps are finalized. To connect existing Urgent Households to current Coordinated Access supports to better align system supports to promote and achieve housing stability for those households. To seek approval to implement temporary changes to the current Urgent Status eligibility criteria for Urgent Medical, Urgent Social and Urgent Homeless statuses to include a requirement that the household has been living in the City of London or County of Middlesex for at least the past 6 months.

2.2 Background

The City of London's RGI community housing waitlist and application process is managed by Housing Stability Services - Housing Access Centre. The work of the Housing Access Centre includes reviewing applications for community housing and assessing applicant's

eligibility for priority and urgent status based on their circumstances. This system contains legislative requirements and optional local rules.

Under the [Housing Services Act, 2011, c. 6, Sched. 1, s. 47 \(2\)](#), Service Managers have the authority to create local rules to prioritize households on the waitlist for rent-geared-to-income assistance. The first priority for all Service Manager regions as directed in the Act is Special Priority Policy (SPP) status. SPP status is reserved for households who have experienced abuse or who have experienced human trafficking.

Presently, Housing Stability Services, Housing Access Centre, recognizes three distinct categories of Urgent Placement Status. Each status is equal in how it is prioritized.

- **Urgent Medical Status**
A Licensed Physician or Licensed Registered Nurse has identified that a member of the household is at serious risk due to one or more of the following criteria:
 - Person(s) who are under continual medical supervision because of a terminal illness.
 - Person(s) who are physically disabled to the point that they cannot live in current accommodations.
 - Person(s) with serious physical problems who must relocate to London for medical treatment

- **Urgent Social Status**
Person(s) whose personal safety is significantly at risk and legal interventions have been exhausted:
 - If a household member has been abused but they have never lived with that abusive person; or it has been longer than 6 months since they lived together, and their personal safety is at risk.

- **Urgent Homeless Status**
For the purposes of allowing Homeless individuals and families priority to social housing in the City of London and the County of Middlesex, the term “homeless” includes:
 - Person(s) living in housing condemned by the municipality;
 - Person(s) whose housing has recently been destroyed by fire or natural disaster and have no place to live;
 - Person(s) about to be discharged from a hospital or another medical facility, who cannot return to their former place or residence and have no place to live;
 - Households whose child(ren) would be returned to their custody by a child protection agency when the adequate housing is provided and lack of housing is the only condition of custody left outstanding;
 - Households without permanent residence such as living on the street or in a motel;
 - Households who use the emergency shelter system.

To be eligible for RGI Community Housing, household income must be below the Household Income Limits (HILs). To be eligible for Urgent Status, households must be below the High Needs Household Income Limits. Household Income Limits are defined by the Housing Services Act, 2011; [O. Reg. 584/22, s. 1, s.2](#).

Table 1: 2023 Household Income Limits - London

Unit Size	Bachelor	1-bedroom	2-bedroom	3- Bedroom	4-Bedroom
High Need Household Income Limits	\$20,400	\$26,400	\$31,200	\$35,700	\$44,700
Household Income Limits	\$34,000	\$44,000	\$52,000	\$59,500	\$74,500

As noted, London’s local rule, Housing Division Notice (HDN) #256 states that Housing Providers must ensure that, 90% of placements be from households in the Urgent category and 10% be from the Chronological category. Chronological applications are those which do not have any priority over others and are housed in the order which they apply. The current City of London RGI Community Housing prioritize can be seen in Figure 1 (below).

1	Special Priority Policy (SPP) Households
	This is a legislated priority for all Ontario Service Managers, which prioritizes individuals and families who are survivors of abuse or human trafficking, above all other households on the waitlist.
2	Urgent Status Households
	Households which have been deemed eligible for Urgent Medical, Urgent Social, and Urgent Homeless Status. Prioritization of special populations, and the criterion for each status is determined by the City of London and can be altered or eliminated as community needs evolve.
3	High Needs Income Households
	Households whose income is below the High Needs Household Income Limits (HILs) as outlined in Table 1. Service Level Stands outlined in the Housing Services Act dictate the number of High Needs Households each community must serve.
4	Chronological Applicant Households
	Households whose income is above the High Needs Household Income Limits and below the Households Income Limits (HILs) as outlined in Table 1, and who are not eligible for SPP or Urgent Status.

Figure 1: Current RGI Community Housing Waitlist Prioritization

Since this ratio policy was originally implemented in 2005, the housing market, and community socio-demographic’s have changed. Housing providers, community support workers, rent-geared-to-income (RGI) tenants, and the broader community, have expressed concerns through formal and in-formal channels about the impacts of the current housing ratio. These impacts include guest management issues, increased unit damages, high eviction rates and an overall impact on the housing stability of other tenants in these locations.

Housing Stability Services began a review of the City’s current practices related to the RGI Waitlist in July 2023. Urgent placement status, housing placement ratios, and the alignment of households to suitable housing options and support, are all subjects of the review. The objective of this review is to provide insightful recommendations and strategies for enhancing outcomes for individuals seeking RGI community housing, aligning Special Needs housing practices to meet the current needs in community for existing residents of community housing buildings and those on the waitlist, housing providers, and the broader community. The review is scheduled to conclude by the end of Q2 2024.

2.3 Out of Town Applicants

There are currently 1612 households with urgent status on the RGI waitlist (approximately 24% of the waitlist) This includes households who do not meet occupancy standards (unit is too large for the household), and households who have been approved for urgent medical, social and homeless status. Of those 1612 households, 1164 (72%) reported living in London-Middlesex and 448 (28%) households were outside of the service manager area at the time they applied.

The attached Housing Waitlist Review – What we Heard from the Consultations Report notes that wait-times for RGI housing are lower in London than other Service Manager regions. Although the Housing Services Act requires Service Managers to approve applications from households anywhere in the province, each Service Manager decides which local priorities it will set, and the criteria for these priorities.

2.3 Initial Consultation Findings

As part of the initial review of the RGI housing waitlist practices, City of London staff, RGI housing providers, RGI property managers, front-line community support staff, leadership from homeless serving organizations, supportive housing providers, and representatives from Middlesex County, working within the Service Manager region have been consulted.

The preliminary findings from the initial consultation reveal that the existing housing ratio frequently leads to a significant concentration of tenants within a building or complex, characterized by pronounced support requirements but for whom there is a shortage of support. This results in adverse repercussions for the tenant, the RGI property, the surrounding community, support staff, and other occupants. Damage to buildings, unit cleanliness issues, hoarding tendencies, violence, fires, floods, criminal behaviour, unit take-overs, and pest infestations are all examples of the array of challenges currently being addressed by providers within their respective properties.

Below is a summary of the key themes that emerged during the consultation sessions:

- London policies should meet the needs of those with housing needs and the community.
- Refining definitions and increasing consistency in processes are envisioned in a future state.
- Building demographics have become dominated by those with high needs causing negative impacts for the community.
- Additional supports for high needs groups are needed; these include life skills training such as unit maintenance, budgeting and how to be a good neighbour.
- More supports are needed for tenants who have mental health challenges, including problematic substance use.
- Housing options such as supportive units are needed until individuals develop the skills and stability to live more independently.
- RGI housing should work toward creating more mixed tenant profile communities.
- Housing providers have observed an increase in out-of-town applicants with urgent status.
- The current placement ratio has been directly identified as negatively impacting RGI tenant and building outcomes.

2.4 Special Needs Housing Alignment

Special Needs Housing is a specific type of housing defined by the *Housing Services Act*, as “housing intended for use by a household with one or more members who require accessibility modifications or provincially funded support services in order to live independently in the community.”

Special Needs Housing in London includes supportive housing for seniors, people with developmental disabilities, and significant health issues. In most instances, units in Special Needs Housing projects are filled by households on the housing providers waitlist and not from the City managed list.

The Waitlist Review currently underway, is looking at the ways that households are currently matched to Special Needs Housing providers and will provide recommendations to align the practices of the current system with the evolving whole of community system response. This work is being undertaken as it was one of the recommendations of the Rent Supplement System Review (CPSC, October 4, 2023).

2.5 Other system supports for urgent status needs

Housing Stability Services is adjusting practices to review the needs of households on the RGI waitlist, including Urgent Households. Reviews will reassess eligibility for Urgent

Status prior to being offered housing and will support the movement of households at the time of application, or while on the waitlist, toward the most suitable housing if they have support needs which are assessed as preventing them from successfully living independently in RGI Community Housing. This work is taking place in collaboration with the Coordinated Access team and will support the matching of households to community programs, housing support programs and supportive housing options as appropriate.

3.0 Financial Impact/Considerations

There is no expected financial impact as a result of the recommendations in this report. Any future financial implications will be identified as part of the final review for Q2 2024.

4.0 Key Issues and Considerations

4.1. Community Impact

It is anticipated that these temporary changes will have an overall positive community impact at a household, neighbourhood and system level. When RGI housing applicants are housed without adequate supports in place, and the tenancy ends as a result, there is a risk that the individual will not have an opportunity to re-enter the RGI system in the future if damages were caused as part of the tenancy, if there were significant problems in the building, or the tenant has accumulated arrears.

Civic Administration will continue to engage with community to identify and mitigate impacts for households with urgent status. This will likely include a reduced number of urgent status households being housed in RGI housing until the review is completed and recommendations are made to a Community and Protective Services Committee meeting by end of Q2 2024.

The temporary reduction of urgent status households entering the RGI system will create an opportunity for more households on the chronological list to be housed.

Households with Urgent Medical Status who are required to relocate to London for medical treatment will continue to be eligible for Urgent Medical Status. Changing the Urgent Status criteria to include London-Middlesex residents only, will help local individuals and families in urgent need to be housed faster.

Conclusion

This report looks to assist in addressing the immediate need within the RGI housing system in London-Middlesex by adjusting the ratio by which households are matched to vacant RGI units and to adjust the amount of time a household needs to live in London/Middlesex to be eligible for urgent status. The feedback from the initial community consultations highlights the ongoing impacts of the existing housing ratio and urgent status application process, offering insight into potential areas for improvement and alignment. Temporarily suspending the current ratio procedure for up to 1 year will provide a path towards creating more balanced housing communities through additional opportunities to engage further with residents, providers and the community.

Making urgent status only available to those residing in London-Middlesex, will assist in ensuring that those households already in the Service Manager area are prioritized for services. This response also emphasizes the importance of considering broader social implications, financial impacts, and long-term stability goals for all involved. Taking time to conduct further consultation and evaluate outcomes, sets the stage for a more equitable and resilient housing system in the city, attentive to the varying needs of individuals and the entire community.

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Recommended by: Kevin Dickins, Deputy City Manager, Social and Health Development



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Housing Division Notice

Date: October 12, 2021

HDN# 2021 – 256

This applicable legislation/policy is to be implemented by the housing provider(s) under the following programs:

Please note if your program is **not checked**, this change is **not applicable** to your project.

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√
√
√
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- Federal Non-Profit Housing Program
- Private Non-Profit Housing Program
- Co-operative Non-Profit Housing Program
- Municipal Non-Profit Housing Program (Pre-1986)
- Local Housing Corporation

Subject: LOCAL SELECTION PRIORITY RULES (IN ADDITION TO THE PROVINCIALY LEGISLATED ELIGIBILITY RULES) (REPLACES HDN# 2005-90)

1. PURPOSE:

Selection Priority for Placements

When selecting an applicant from the centralized social housing waiting list, offers by the Housing Providers should be made in the following order:

1. Applicant households approved under the **Special Priority Policy (SPP)**;
2. Applicant households deemed to be in an **Urgent** situation ranked according to the date the status was assigned;
3. Applicant households in the **High Need** category by date of application; and,
4. Applicant households in the rent-geared-to-income category ranked **Chronologically** by date of application (see Placement Ratio below).

Placement Ratio: Housing Providers must ensure that, after all SPP applicants are first placed from their waiting lists, a maximum of 90% of placements must be from households in the Urgent and High Need categories and 10% from the Chronological category.

Market rent households are not included in the selection priority for placements.

Housing Providers must adhere to their legislated targeting plan for the number of market rent units, the number of rent-geared-to-income units and the number of high need units in their portfolio.

Definitions:

Special Priority status is determined by the Service Manager through the Housing Access Centre.

1. **Special Priority Policy (SPP)** household is defined in O. Reg. 367/11 s 52 to s 58.
2. **Urgent Status** as determined by the Service Manager through the Housing Access Centre.
3. **High Need** household means a household whose annual income is less than or equal to the amount as set in the Housing Services Act, 2011 O.Reg 370/11 for the size of unit the household occupies and the part of the service area in which the unit is located. Please refer to the local Housing Division Notice regarding the Maximum Household Income for current High Need Household Income Limit, as they are updated annually.

2. BACKGROUND AND COMPLIANCE STANDARD:

The local eligibility rules for rent-geared-to-income assistance were approved by Municipal Council on April 18, 2005 and are as follows:

- a) Placement Ratio in Selection Priority for Placements
- b) Clarifications in Urgent Status Wording
- c) High Need Income Limit Levels

These local eligibility rules will provide opportunities for at least 10% of the geared-to-income assisted tenant base is housed from the chronological list. This placement ratio provides the applicant households in this category access to subsidized housing while still housing those most vulnerable in our communities as a priority.

3. ACTION:

That Housing Providers implement the local selection priority rules for rent-geared-to- income assistance.

4. AUTHORIZATION:

Original signed by

Dave Purdy
Manager, Housing Services

Date: October 12, 2021

CITY OF LONDON: HOUSING WAITLIST REVIEW
WHAT WE HEARD
REPORT FROM THE CONSULTATION SESSIONS

September 2023



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INTRODUCTION

The Housing Waitlist Review Project has been undertaken by SHS Consulting (SHS) under the direction of the Housing Access Centre within the Housing Stability Services of the City of London. This project's objective is to provide recommendations and strategies to improve outcomes for those in need of housing, housing providers, residents of community housing buildings, Special Needs Housing applicants and providers, and the broader community.

In support of this objective, the Project involves conducting a review of the City of London's current policies and practices related to connecting households to Rent-Geared-to-Income (RGI) housing assistance including urgent households, housing priority ratios, and matching households to appropriate housing. The Project undertakes a review of the following aspects of London's RGI Housing Waitlist practices:

- Specific local rules permitted under the Housing Services Act, that determine the criteria for Urgent Status, and how specific target populations are prioritized for RGI assistance
- The Ratio used to prioritize Urgent Status applicant households
- Processes for households that do not meet occupancy standards (over-housed/under-housed)
- Practices for households experiencing or at risk of homelessness and the assessment and matching to housing for this group
- Housing needs screening and assessment tools available to assess individuals and households
- Practices for Special Needs Housing that match applicants with housing outside of the RGI Housing Waitlist practices, and identify opportunities to realign current processes with the waitlist and matching community practices currently in place

Consultation for the Housing Wait List Project is focused on the following lines of inquiry and engagement groups:

- City of London Staff – Focus Group with London Staff to understand current practices regarding the RGI Housing Waitlist related to the urgent priority populations, the Ratio of Urgent Status to Chronological Population, assessment practices and application procedures. This line of inquiry seeks to understand the current strengths and challenges of these practices and what is envisioned in a future state including the opportunities and barriers or risks.
- Housing Providers – Focus Group with Housing Providers, agencies delivering supportive housing programs, support workers, and representatives from Middlesex County, to understand the experience of housing providers, support staff, and tenants in community housing. The discussion was focused on the outcomes of the current Ratio of Urgent Status to Chronological Population and Urgent Priority population policies. This discussion included observations of experiences within community housing, recommendations for what might work better, challenges for tenants and what might be needed for more successful outcomes.

- Service Managers – Interviews with Service Managers to understand different policies and practices employed relating to the identification of Urgent Priority Groups or local rules, the use of a Ratio to match specific populations to available housing units, practices related to the By-Name List and RGI Housing Waitlist, assessment tools used to identify housing needs and practices for Special Needs housing.
- Key Informant Interviews – Semi-structured individual interview with representative of large Housing Provider to develop an in depth understanding of the challenges and needs within community housing that is operated by this provider related to the Urgent Status to Chronological Ratio and the Urgent Priority populations.

Engagement sessions were undertaken virtually from July 20 to August 17, 2023. There have been 36 participants in the consultation. Following is an overview of the feedback obtained at each of the consultation events.

CONSULTATION WITH CITY OF LONDON STAFF

On July 20, 2023, SHS met with City of London staff to gather feedback on the RGI Housing Waitlist processes. The purpose of this session was to provide context on the objectives for the project, provide an overview of the current state of the RGI Housing Waitlist processes and obtain feedback on the City's policies and practices relating to the Urgent Status groups and prioritization of households on the waitlist.

Participants

A total of 12 City staff participated in this engagement session, including representatives from:

- Housing Stability Services: Director,
- Housing Access Centre: Manager, Team Staff
- Municipal Housing Development: Manager: Team Staff
- Coordinated Access: Team Staff

Current Strengths

The urgent status groups reflect some community members' current needs and allow residents to access supports. Changes should continue to meet the needs of individuals with housing needs and the community at large.

- The urgent status priority groups represent the areas of need within the community. Residents can apply for an urgent status that is representative of their current situation. Urgent status assists in prioritization and helps to form a picture of the types of challenges experienced within the community.
- London has great relationships with partners such as community agencies, housing, and service providers.

Current Challenges

The accessibility of urgent status is a challenge, as are the abilities to verify information, referring professionals' interpretation of policies and management of total needs.

- Urgent status is very accessible and may run counter to the intent of the practice and related local rule. It results in a large urgent group, as it consists of three different urgent status priority groups; homeless, medical, and social.
- There are difficulties in tracking applicants on the waitlist due to the number of people in the different urgent groups. It is also difficult to track outcomes for applicants once they are housed.
- Verification and follow-up with referring agencies can be challenging. Application submission and content are not consistent.

- There is a need to confirm information with external partners at the time of application or if the situation changes over time. This can create challenges when partners are difficult to reach or have staffing changes.
- Referring professionals may not understand urgent status criteria, thereby causing challenges for City staff.
- There is redundancy for staff as applicants may apply and be eligible for more than one priority area.
- It is difficult to understand if applicants meet the requirement to be able to live independently or if they have support in place.
- It is difficult to support the number of applicants and level of support that is needed due to the demand for housing.
- Tracking an applicant's movement through the system and communication with housing providers can present logistical pressures.
- Current assessment tools are not consistently used and may not be the best to determine individual housing support needs. A lack of information or circumstances when applications are made, as well as evolving household circumstances can also impact suitable housing placement.

Opportunities for a Future State/ What is Envisioned

Consider changes such as refining definitions, reducing potential overlap and increasing consistency in processes.

- Tightening up the system can help ensure that those in most need get helped first.
- Reducing redundancies, ensuring consistent application of urgent status criteria, and implementing assessments for applicants to support matching to the right housing and supports at the right time are envisioned for a future state.
- Consideration should be given to restricting urgent status to London residents, or households who have been in the London area for a specified time.
- Increase the use of technology to streamline processes and reduce the administrative burden.
- Assessment of RGI housing applicants' needs could be done through increased use of HIFIS (Homeless Individuals and Families Information System) or other available information.
- Contact with supporting agencies, current landlords, family, and others, can help achieve best outcomes for applicants.

Risks to Future State

The risks for a future state include increasing barriers for clients and limiting opportunities for RGI housing for urgent status applicants.

- The risk includes the potential of adding new challenges and barriers to access housing.
- Changes to the Ratio would decrease the number of urgent status applicants housed
- Opportunities for urgent status applicants could decrease if changes do not come with additional support.

CONSULTATION WITH HOUSING PROVIDERS

On July 28, 2023, SHS met with RGI housing providers, RGI property managers, front-line support staff, supportive housing providers, and representatives from Middlesex County that serve City of London and County of Middlesex. The meeting sought to obtain feedback on their experiences and the experiences for the occupants of the buildings they operate with the current policies and practices relating to the Urgent Priority groups and the Urgent to Chronological Ratio. Participants were asked to provide their comments on the following questions:

- Have there been positive or negative outcomes from the 9 urgent to every 1 chronological ratio policy? Do you have recommendations or examples of systems which might work better?
- Do you have recommendations for changes to the urgent status process which could result in better outcomes for Londoners?
- What are some common challenges tenants experience?
- What could we screen for to ensure that tenants meet the requirement that they be able to live independently?
- What do you as a housing provider need to support successful tenancies? What supports do you believe households need in order for tenancies to be successful?
- What other policies impact your day-to-day work? How can these be altered to improve outcomes for the community?

Participants

In addition to two City of London staff, there were 14 participants in attendance at this session, which included representatives from:

- London Middlesex Community Housing: Manager, Team Lead, Front-line Staff
- Middlesex County: Manager and Front-line Worker
- Apex Property Management
- Cheshire Homes of London
- Whiteoak Housing Co-op
- Canadian Mental Health Association
- Arnsby Property Management
- Indwell
- WLK Seniors Assistance Association
- Social Housing Operators Advisory Committee Members

Housing Waitlist Ratio

The current housing waitlist ratio has led to a high proportion of tenancies within buildings or complexes that need support, but where limited support is available. This has resulted in negative impacts to buildings, communities, and tenants.

- Observation of negative impacts include damage to buildings, unit cleanliness, hoarding and collecting, violence, criminal behaviour, unit take-overs, and pests.
- Urgent homeless applicants from out of town have increased.
- One provider suggested that being a London-Middlesex resident for a specific period might be helpful to ensure those experiencing homelessness in London are prioritized.
- It was suggested that applicants have a period of demonstrated housing stability prior to being made eligible for RGI Housing support.
- The legislated requirement to house Special Priority Policy (SPP) applicants first can result in only SPP applicants being housed, resulting in buildings and complexes in which most tenants have similar challenges.
- Urgent Status and SPP applicants dominate the City's waitlist for RGI housing. Chronological applicants are rarely housed.

Recommendations for Better Outcomes

Overall, support is key and this should be combined with understanding and providing for tenant needs beyond housing.

- There is a huge demand for tenant support.
- The definition of urgent should be more specific.
- It would be beneficial to understand the tenant's background and history. Some urgent status applicants are better able to live independently than others.
- Households who need supportive housing should be redirected there.
- Support needs to be maintained once housed, and agencies providing it need to be accountable.
- Housing providers need the ability to decline applicants when the required level of support cannot be provided.

Tenant Challenges

Tenants' challenges can include physical limitations, mental health challenges and a lack of housing stability skills.

- Some tenants lack basic understanding of unit maintenance, including performing housekeeping, budgeting, obligations regarding leases or how to live independently.
- Tenants can have literacy challenges, which can impact their ability to understand their lease and other written rules and notices.

- When problems with tenancies arise, the Tribunal is the only resource, and the wait for a hearing is lengthy.
- Conditions of the units deteriorate so there are issues with pest infestations which can cost thousands every month.
- Social housing providers do not have the resources to support tenancies with all their needs including housekeeping or laundry.
- These issues impact the entire building and addressing them drains the provider's financial resources.
- Mental health challenges, including substance use issues, can result in several problems including unwanted guests, violence, fires, and floods.

What supports are needed for tenancies to be successful?

More frequent and constant support as well as education regarding unit maintenance and obligations can contribute to successful tenancies.

- Support exists when tenants are seeking housing. This changes when they are housed.
- Tenants need direct support, and some would benefit from daily check-ins.
- Tenants should be required to agree to conditions to access housing.
- Once housed, support can be difficult to maintain and tenants may not allow support workers access to units as often as needed.

Agencies in contact with individuals seeking housing might also benefit from greater awareness and education.

- Agencies may not understand that those seeking housing may not be ready to live independently.
- Tenancy issues can be difficult for housing providers or agency contacts to understand due to different lived experiences.

What do you need as a housing provider?

Financial support for housing providers, education and support for tenants, and collaboration with agencies would help housing providers support successful tenancies.

- Financial relief with maintenance and upkeep such as ongoing pest control.
- Support for tenants to prepare units for pest removal.
- Funding for substance abuse and mental health in the community to support in times of crisis.
- Support for tenants who have cognitive challenges at the time of lease signing, and when issues arise.
- Education for tenants about unit maintenance and housekeeping prior to housing and as part of the application process (how to do laundry, how to wash dishes, etc.) .
- "Rent-Smart" program to educate tenants on their rights and responsibilities.

Other housing options such as supportive or transitional housing may be more appropriate for individuals or families with specific needs.

- Supportive housing that includes programs such as enhanced or standard support would better address the issues of individuals and households where support is needed.
- Other housing options outside of traditional housing models.
- Tenant support with access and transition to supportive housing models, long term care access, group homes, etc.

Enhanced screening processes to assess individual or household needs.

- Screenings or assessments could be used to inform the level of housing support needed.
- Better collaboration between housing providers, service providers and the City of London to identify tenants' needs.
- Housing providers need the ability to refuse applicants who require high levels of support.

What other policies impact your day-to-day work? How can these be altered to improve outcomes for the community?

Improving communication and practices to encourage movement when occupancy standards are not met might support tenant movement within the system.

- Policy for the over-housed is challenging as it takes a year to remove subsidy which does not serve others on the waitlist or the community.
- Communication and education for the process for when a tenant's rent is in arrears could be improved.

SERVICE MANAGER INTERVIEWS

SHS met with representatives from different Service Managers in the province from August 3 to 17, 2023 to understand different practices in place to manage the Community Housing Waitlist and inform the London Waitlist Review Project. The tables below provide summaries of interview findings. Table 1 provides a summary of the local priority definitions. Table 2 provides a summary of the policies regarding over-housed households. Table 3 provides information on the urgent status to chronological status ratio. Table 4 gives information on the RGI Waitlist Ratios from other municipalities not included in the Service Manager Interviews. Table 5 includes information on wait times for RGI housing.

Participants

SHS conducted four (4) Service Manager interviews with representatives from:

- Region of Waterloo: Manager, Housing Programs
- Region of York: Manager, Housing Strategic Initiatives
- City of Ottawa: Program Manager of Community Housing, Lead Program Administrator, Community Housing, Program Coordinator, Homelessness Branch
- City of Windsor: Manager of Social and Affordable Housing, Manager of Homelessness Special Projects

Reference to Priority Groups is referred to as ‘local’ priority status.

- The Service Managers that were part of these interviews referred to ‘local’ priority status rather than “urgent” status for local rules.
- Service Managers commented that they had used the term ‘urgent’ to refer to local rules in the past and this term tended to raise applicant expectations regarding how quickly they may have access to housing. They found the use of the word “local” to be more effective in managing expectations.

Urgent Priority Groups have similar definitions.

- Similarities were found in the groups receiving priority status through local rules in the following groups: escaping violence, separated families, terminal illness and persons experiencing homelessness or at risk of homelessness (definitions are also summarized in Table 1).
- Distinct categories from other communities included:
 - **Displaced RGI** – RGI households who are displaced as a result of their housing no longer being available.
 - **Graduates of Supportive Housing** – Tenants of supportive housing who have demonstrated to the supportive housing agency that they are now capable of independent living with or without support.

- Families with members in community housing (**Sunnyside**) – Family members over 60 years of age and qualify for RGI Housing based on income would have local priority to Sunnyside Long Term Care Home.

Specific characteristics distinguish local definitions.

- **Terminally ill** is the name of a part of a definition of a local prioritized group which is a situation where someone has been medically diagnosed with a terminal illness and has a life expectancy of 2 years or less.
- **Separated family** is the name of a local prioritized group for households with children in the care of Family and Children's Services where housing is the only issue preventing reunification of the family.
- **Homeless** is identified as a local prioritized group that includes households or individuals without shelter, living on the street, living in emergency shelter, whose residence has been destroyed or is uninhabitable and individuals or households who will not be released from medical or treatment facility without housing.
- **Escaping Violence** is the name of a local prioritized group where individuals or households are unable to secure Special Priority Policy (SPP) Status due to lack of proof of co-habitation or risk due to criminal activity.

Requirement to be able to live independently or have supports in place

- The ability to live independently is identified in Provincial regulations as an eligibility requirement for RGI housing.
- For one Service Manager, individuals are not placed in Community Housing if they are not able to live independently. Another Service Manager requires an agency to confirm that the applicant can live independently.
- The ability to live independently is also part of the eligibility on the application form.
- One Service Manager local rules state that applicants may qualify for local waiting list status if they have resided in the community for at least 12 consecutive months and have low income.

Supporting practices can address administrative issues.

- Annual or biennial updates are required to keep information current and determine if household needs have changed.
- An online application process can make the process more efficient and serve as one indicator of the ability to live independently.

Table 1 Summary of Local Priority Definitions					
Municipality	London	Waterloo (Aug 3)	York (Aug 11)	Ottawa (Aug 16)	Windsor (Aug 17)
Prioritized groups (local rules-prioritized before chronological applicants)	Urgent Status	Local Prioritized Status	No local Priority	Local Priority Access Status	Priority II Category
Local prioritized groups	Urgent Homeless	Homeless	No local priority groups	Homeless	Homeless
	Urgent Medical Status	Terminally ill		Life threatening medical illness	
	Urgent Social Status	Escaping Violence		Urgent Safety	
		Separated family		Displaced RGI	
		Sunnyside priority		Graduate of Supportive Housing	
Medical Status/ Terminally ill/ Life threatening medical households	Medical supervision because of a terminal illness	Medically diagnosed with terminal illness		Terminally ill or life-threatening condition made worse in current housing	

Table 1 Summary of Local Priority Definitions					
Municipality	London	Waterloo (Aug 3)	York (Aug 11)	Ottawa (Aug 16)	Windsor (Aug 17)
	Physically disabled and cannot live in current home	Life expectancy of two years or less		Physician opinion needed that move would remove the life-threatening aspect of the condition	
	Relocation to London required for medical treatment				
Homeless	Homeless	Unsheltered		Households confirmed as experiencing homelessness	Living in shelter
	To be discharged from medical facility and has no place to live	Waiting for hospital or another treatment facility discharge, cannot return home		Households staying at City emergency shelter or living unsheltered	No permanent address and staying in other people's homes
	Child(ren) would be returned to household and lack of housing is the only condition	Using the emergency shelter system as primary residence			Residence destroyed or living in substandard housing that has been condemned

Table 1 Summary of Local Priority Definitions					
Municipality	London	Waterloo (Aug 3)	York (Aug 11)	Ottawa (Aug 16)	Windsor (Aug 17)
	No permanent residence, living in a hotel	Home has recently been destroyed by fire or natural disaster (within the last 3 months)			No funds to obtain housing
	Current housing has been condemned				Active eviction notice
Separated Family (homeless)		Children in the care of Family and Children's Services			Children will be removed without housing
		Will not be returned until adequate housing is found			Home needed for family reunification
		Housing is the only remaining child protection issue			
Urgent Social Status/ Escaping Violence/ Urgent Safety Households	Abuse through use of force	Experiencing exceptional risk due to criminal activity		Individuals that do not qualify for SPP, subject to abuse, change in housing would result in an increase in safety	

Table 1 Summary of Local Priority Definitions					
Municipality	London	Waterloo (Aug 3)	York (Aug 11)	Ottawa (Aug 16)	Windsor (Aug 17)
	Forced to engage in sexual activity	Individuals that do not qualify for SPP because they are unable to provide proof of cohabitation.			
	Threatening words or actions				
	Do not qualify for SPP status				
Sunnyside		60 years or older with direct family member living at Sunnyside Home. Must qualify for rent-geared-to-income assistance			
Displaced RGI				RGI households who are displaced because of their housing unit no longer being available for RGI housing	
Graduates of Supportive Housing				Residents of supportive housing ready for independence	

Over-housed tenants are a top priority.

- Local rules for Services Managers prioritize over-housed households over other urgent groups identified in local rules.
- Provincial regulations are followed regarding notification of over-housed status and removal of eligibility for RGI Housing.
- Service Manager representatives disclosed that, in some instances, households will allow their RGI eligibility to lapse rather than move to an appropriate unit.
- Internal transfer policies within the housing provider building or within the community are included with over-housed local rules to further support movement where occupancy standards are not met.

Table 2: Summary of Over-Housed Local Rule and Practices					
Municipality	London	Waterloo (Aug 3)	York (Aug 11)	Ottawa (Aug 16)	Windsor (Aug 17)
Priority	Placed on RGI Housing Waitlist with Urgent Status (transfer). Priority based on original application date.	Ranked higher than local status	Top priority (after SPP). No other local priority	Ranked higher than local priority access follows	Ranked higher than Priority 2
Process	<p>Notice provided to household that they no longer meet occupancy standards</p> <p>Placement on internal transfer list for building operated by same Housing Provider within one (1) year and on the RGI Wait List</p> <p>Household to select 10 housing preferences after one (1)</p>	<p>Notice provided to household that they no longer meet occupancy standards</p> <p>Application for transfer within the same building can be made. Households may be put on a waiting list for a transfer.</p> <p>If the housing provider does not have an appropriately sized unit must</p>	<p>Notice provided to household that they no longer meet occupancy standards</p> <p>Consistent with legislation, household is eligible for RGI assistance for 1 year</p> <p>If offer to move is refused after 1 year household is ineligible for</p>	<p>Notice provided to household that they no longer meet occupancy standards</p> <p>Effective date of over-housed decision begins 1 year period</p> <p>Minimum number of housing preferences selected, 10 within the first year</p>	<p>Notice provided to household that they no longer meet occupancy standards</p> <p>If the housing provider does not have an appropriately sized unit, 5 units chosen</p> <p>If housing provider has an appropriately sized unit, application may</p>

Table 2: Summary of Over-Housed Local Rule and Practices					
Municipality	London	Waterloo (Aug 3)	York (Aug 11)	Ottawa (Aug 16)	Windsor (Aug 17)
	year, and an additional five for each subsequent year Refusal to accept an offer of housing will result in the household ceasing to qualify for RGI assistance	choose 10 sites One refusal allowed after first year, following refusal household becomes ineligible	RGI assistance Where housing provider does not have appropriately sized unit, the household are required to move to smallest unit within housing provider portfolio	Households may refuse offers in first year; following first year refusal of offer will result in household being ineligible for RGI assistance	be made to internal transfer list within 1 year or ceases to be eligible for RGI assistance

Practices regarding the Urgent Status and Chronological Status Ratio are different than those practiced in London.

- The use of a ratio for selection of applicants for a housing unit is different across Service Manager practices and summarized from the Service Manager interviews in Table 3.
- Two of the Service Manager representatives interviewed do not use a Ratio.
- Ratios vary in different communities, in one community 1 in 5 is assigned to a local status and in another 1 in 10 is assigned to a local status.

Table 3: Urgent Status and Chronological Status Ratio					
Municipality	London	Waterloo (Aug 3)	York (Aug 11)	Ottawa (Aug 16)	Windsor (Aug 17)
Ratio	9 to 1 Urgent Status to Chronological Status	1 in 10 Local prioritized status to chronological	No Ratio	1 in 5 Priority access to chronological	No Ratio

Prioritization	SPP	SPP	SPP	SPP	SPP
	Urgent Status (Homeless, Medical, Social, Over-housed)	Terminal Illness	Chronological	Over-housed	Chronological
	High Needs Household Income Limits households	Over-housed		Local Priority Access Status	
	Chronological	Local Prioritized Status		Chronological	
		Chronological			

Table 4 RGI Housing Waitlist Ratio Practices in Ontario	
Municipality	Urgent to Chronological Waitlist Ratio
Algoma	1 in 10
Bruce	1 in 10
Chatham-Kent	20% chronological
Dufferin	1 in 5
Grey	1 in 10
Guelph-Wellington	1 in 10
Lambton	1 in 10
Niagara Region	1 in 10
Stratford Perth- St. Marys	1 in 5

Source: City of London, 2023, Built for Zero, Peer Calls, 2022.

RGI Housing for the Chronological group has wait times of 4 years and greater.

- The need for RGI Housing is illustrated in the long wait times.
- Households classified as chronological group have wait times of between 4 and 10 years.
- Wait times depend on several factors including family size, buildings selected, the number of other applicants with higher priority status on the waitlist, and the turnover rate in the buildings of choice.

London	Waterloo (Aug 3)	York (Aug 11)	Ottawa (Aug 16)	Windsor (Aug 17)
Chronological household average wait times 3-6 years	Chronological household wait times approximately 8 years	Chronological household wait times approximately 10 years	Chronological household wait times between 4 to 8 years	No information on wait times

KEY INFORMANT INTERVIEW

On August 10, 2023, SHS met with a representative of London Middlesex Community Housing (LMCH). LMCH is the largest housing provider in the City of London and County of Middlesex with 3,282 units in 32 properties that house over 5,000 people. The interview was to provide more in-depth information and history of the experience in the community housing properties, to confirm the issues identified in the Housing Provider Focus Group and to identify opportunities for improved outcomes.

Participants

The following were in attendance for the key informant interview:

- London Middlesex Community Housing: Director, Tenant Administration
- City of London: Housing Support Worker, Housing Stability Services

RGI buildings no longer have a diversity of households.

- Ratio and local rules initially 'made sense' and were to address the challenges when the province downloaded responsibilities.
- Historically, housing need and the homeless population were not the levels that are seen today.
- Changes in the demographics of the communities and aging population leading to higher turnover rates.

- Previously buildings had a diversity of households, mix of incomes and socio demographic characteristics.
- With turnover rates, the majority of new residents are from urgent status.
- All new tenants come from high needs and priority groups.
- Significant change in housing needs since these policies were put in place and an increase in mental health needs of applicants.
- New requirements regarding asset limits may impact some tenants.

Behaviours in buildings are challenging.

- Behaviours in buildings have changed with negative outcomes within the building.
- Anti-social behaviour within buildings.
- Destruction of property such as fire in a unit which impacted 17 other units.
- Guests of tenants and those they are associated with can be linked with negative behaviour and are also a challenge.
- Negative behaviour are associated with issues that are found in the broader community but at the LMCH sites as well.
- Individuals and households identified as Urgent Homeless can be a challenge.

Housing providers are not equipped to address high needs tenants.

- LMCH is not a social service agency, and there have been reviews on how to address the issues.
- Support is required for many new tenants.
- New tenants come with no or limited support, Ontario Disability Support Program (ODSP) or Ontario Works (OW) contacts do not provide the support they need.
- Tenants have concurrent issues such as mental health and addiction and many do not have basic life skills like understanding of how to live in a community, pay rent, budget, obligations relating to unit.
- There are also challenges with completing the annual reviews.

LMCH is directing resources to address challenges in RGI buildings.

- Staff are needed to support high-need tenants.
- Security is needed to manage tenant interactions in buildings.
- Should funding be directed to these challenges or toward housing development?
- Completion of annual review and notice of assessments are challenges, so are Provincial requirements.

Additional supports for tenants, expanded assessments through intake and investments in supportive housing are needed to address the challenges.

- Housing Stability workers could provide additional support.

- Housing providers are filling the support gaps of their tenants.
- Intake and assessment of individuals applying for housing support is needed.
- Housing needs to be provided with support when needed.
- Could additional secondary screenings be considered that provide more background and history?
- Cross-agency review and support would be beneficial.
- LMCH is community housing not supportive housing.
- Investments in supportive housing are needed until people are ready for RGI Housing.

Policy recommendations

- Some reduction in the ratio should be considered for incremental changes over time.
- One of the goals for community housing should be to create mixed income communities.
- There may be a need to address deeper affordability through RGI housing.
- Policy for over-housed needs to be considered.

KEY CONSULTATION THEMES

Below is a summary of the key themes that emerged during the consultation sessions:

- London policies need to change to meet the needs of those with housing challenges and the community at large.
- Verification of information and interpretation of policies from referring professionals are some of the challenges in the management of the RGI Housing Waitlist.
- Refining definitions, reducing potential overlap, and increasing consistency in processes are envisioned in a future state.
- Building demographics are dominated by those with high support needs, which has caused negative impacts.
- Additional support for high needs groups is needed while housed. These include life skills, unit maintenance, budgeting, and responsibilities for occupancy, support for mental health challenges, and problematic substance use.
- Housing options like supportive units are needed until individuals can live independently.
- The RGI housing system should work toward creating mixed income communities.
- Support from partners is needed to address the challenges with RGI Housing.
- Administrative changes can support greater efficiency for London.
- Increased focus on screening and assessment of applicants can help ensure that households have successful tenancies, and that RGI housing buildings and the community at large see a reduction in negative outcomes because of the current process.

RECOMMENDATIONS

The Urgent to Chronological Ratio policy contributes to RGI Housing being occupied by many households with high support needs. Housing providers have identified challenges related to tenant behaviours including violence, guest management issues, and damage to units and buildings. Housing providers have needed to direct resources into additional building maintenance and security to address these challenges. The following recommendation to the Ratio Policy is proposed to address the current challenges and provide some relief while the review currently underway can be completed and recommendations made.

Recommendations and Rationale	Implementation Elements
<p>Recommendation 1: The use of the current Ratio should be paused for up to 1 year while the review and additional recommendations related to the prioritization, urgent groups, and are completed and a new plan is developed and approved by council.</p> <p>RGI buildings require immediate intervention to help improve experiences for providers, tenants, and the broader community.</p>	<ul style="list-style-type: none"> • Implement a ratio of 2:8 (20% urgent to 80% chronological) for up to 1 year, and update the HDN (Housing Division Notice) to reflect this local rule • Complete the review of current urgent status criteria for the City of London, and through consultation ensure that the proposed new system identifies and considers the needs of all parties (applicants, tenants, housing providers, community supports, and the community at-large). • Prepare recommendations for council on a permanent ratio and urgent populations process by the end of Q2 2024.
<p>Recommendation 2: To better address the immediate needs of the community, the City of London should pause the acceptance of Urgent status applications from applicants who have not been in London-Middlesex for at least 6 months.</p> <p>Although anyone can apply for RGI housing in any service manager region, urgent homeless, urgent social, and urgent medical status should prioritize those in need in the service manager area.</p> <p>Urgent Medical status currently includes those households that must relocate to London for medical treatment. It is proposed that households who meet this criterion be the only urgent population from outside of</p>	<ul style="list-style-type: none"> • Require urgent status applicants to have lived in London-Middlesex for at least 6 months to be eligible for urgent status on the RGI waitlist. • Complete the review of current urgent status criteria for the City of London, and through consultation ensure that the proposed new system identifies and considers the needs of all parties (applicants, tenants, housing providers, community supports, and the community

Recommendations and Rationale	Implementation Elements
London-Middlesex eligible for Urgent Status.	at-large. <ul style="list-style-type: none">• Prepare recommendations for council on criteria for urgent populations by the end of Q2 2024.