

17 Paton Road Focus Group Tenants' review of
Joy Connelly's report of April 19, 2021, entitled
“Recommendations from 17 Paton Road tenants on the Toronto Housing Allowance Program”

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Review

Why we are writing this review

We are writing this review in honour of the Shared Understanding that was agreed upon with Richard H. Marshall on January 4th, 2021. His email of that day stated the following summary of this Shared Understanding:

- The focus group, facilitated by consultant Joy Connelly, will gather information from 17 Paton Road tenants on their perspectives, experiences, and recommendations to improve the TTHAP and TRSS program customer service experience.
- The process will draw from and elaborate on materials and documents already submitted by the tenant group rather than focusing on a recounting the original experience.
- The focus group is considered phase 1 of a larger evaluation which will respond to the following City Council direction:
 - *City Council direct the General Manager, Shelter, Support and Housing Administration, to consult with the Ministry of Municipal Affairs and Housing and the Ministry of Finance on opportunities to improve the customer service experience for both applicants and recipients of **all** Provincially funded and administered housing allowance programs.* (my emphasis)
 - This will include evaluation of the process steps under City administration (pre-application) including the roles of outreach and the referring housing workers.
 - Recommendations related to process steps under Provincial administration will involve consultation with our counterparts at the Ministry of Municipal Affairs and Housing and the Ministry of Finance.
- Information gathered from the focus group will be written up into a report which will be used, along with previous related reports and evaluations, to shape the next phases of the overall evaluation. In keeping with the City's procurement policies, the consultant for these phases of the evaluation has not yet been determined.
- Members of the 17 Paton tenants group will be:
 - **Provided with an opportunity to review the focus group report draft before it is finalized**
 - Provided with a copy of the final focus group report
 - Included in communication on the next phases of the evaluation.

At our meeting with Councillor Bailão on May 25, SSHA Manager Maria Varlokostas expressed that she thought we had reviewed Joy's draft. We explained that this was not the case. What happened is that after the Focus Group meeting of January 24, Joy asked us to read and correct Jamilla's notes and we sent her our corrections on February 8th. As Joy herself noticed, the notes were of poor quality, often incorrect or confusing and Joy was grateful that we took the time to correct them. These notes were not a draft of a report.

Joy's text of April 19 is the first report we see since we met. We consider it as the “**focus group report draft**” and thus the present document is our “**review**”.

Appropriately reviewing Joy's focus group report draft gives us agency to fulfill our responsibility as housing advocates. By enacting such agency, we take responsibility towards our own lived experience, towards the lived experience of all individuals houseless at the moment and of those near eviction or renoeviction and, more specifically towards the organizations and individuals who endorsed the “8 requests for deep change” that we had previously formulated for SSHA and that served, in agreement with Richard H. Marshall, as the backbone of our discussion on January 24th.

The full list of current endorsers is provided [here](#).

Acknowledgements

We thank Joy for her work, for her effort to understand and respect our experience and trauma and for her respect of our request that her narrative be abstracted from quoting us directly. We acknowledge that we feel that our experience is mostly well represented and thoughtfully used to support our recommendations. Thank you for that

Modifications we are asking for

1) Modification of the structure of the draft

How our recommendations are presented in the current draft is problematic.

Our recommendations have their own hierarchy and as such they form an integrated whole vision for the future of housing allowance programs. They however appear as a list of apparently independent items in the current draft. This, we are aware, opens the door for policy makers to meet only some of them and be satisfied with minor changes and, this is exactly what we want to avoid.

We are asking for a rearrangement of the draft so that its structure faithfully follows the hierarchy of our recommendations and thus represents our integrated vision.

Example: Our most important recommendation is that the process behind housing allowances be reversed: housing seekers get full proof of their entitlement to a housing allowance and proof of the exact amount of the housing allowance they will get before they start their housing search.

When this is the case, then a lot of the current disempowering and risk-prone barriers in the process disappear and instead a certain level of empowerment is achieved. For example, the controversial “Intent to Rent”/Rental Promise” form disappears and with it the extra layers of stress, humiliation and landlord’s discrimination. Instead, clients empowered by their entitlement to a housing allowance can provide their entitlement form as a proof of income for landlords. The process is simpler and chances to find an appropriate, safe, long-term unit become higher. Those with the lowest income level are not forced to downgrade their search to tiny, shakily maintained, possibly meant for renoeviction, first come first serve units, where the cheques for first and last rents are the deciding factor.

Overall, we suggest that Joy keeps the same rationale to support our vision, but presents it following a structure similar to the one below:

HOUSING ALLOWANCES PROVIDE WHAT PEOPLE NEED	
LONG-TERM HOUSING SECURITY	<p>Toronto builds social housing again and considers housing allowance and benefit programs as a stop-gap measure.</p> <p>All recipients of allowances are bridged into rent-geared-to-income when their housing allowance ends. No program ends before such bridging is possible. Annual reviews of housing allowance entitlement are meant with housing security in top priority. COHB recipients are not taken off the Centralized Waiting List.</p>
APPROPRIATENESS AND RESPONSIVENESS	<p>As they are calculated/allocated now, housing allowances can be so limited that recipients enter into food or basic needs insecurity after they get housed. It is also reported that a lot of applicants abandon their applications partly out of fear that this will be the case. The only real solution is to calculate the allowances with an approach similar to RGI:</p> <p>Housing allowance = difference between 100% AMR and 30% of income</p>

PROGRAMS EMPOWER CLIENTS AND ENABLE THE RIGHT TO HOUSING		
APPLICATION PROCESS IS REVERSED	<p>CLIENTS ARE EMPOWERED</p> <p>Implementation means:</p> <p>Eligibility is client-centered</p> <p>No added discrimination by landlords</p> <p>Right to self-determination</p> <p>Allowance amount is client-centered</p>	<p>Housing seekers get written proof of their entitlement*** to an allowance + written proof of the exact amount for the allowance before they start looking for housing</p> <p>Eligibility to apply does not depend on the future rent; it depends only on income and status.</p> <p>No need of “proof of address”, no need of a willing landlord's signature on the “Intent to Rent”/”Rental Promise” form; no need of that form.</p> <p>Entitlement can be used as proof of income for landlords; housing seekers can be creative about their housing choice</p> <p>Calculation/choice of the allowance by the City does not depend on the future rent and thus, no need of a “rent cap”, no need of an “AMR”</p>
	THEY RECEIVE RIGHT SUPPORT AT RIGHT TIME	If the housing seeker is new to budgeting and needs assistance to know what maximum rent they could afford, that assistance is provided after the entitlement and the amount of the allowance have been given
PROCESS IS INCLUSIVE	ACCESSIBILITY	The programs are made more accessible
		<ul style="list-style-type: none"> - Local priority rules are revised to increase access to housing allowances, RGI and housing and diminish housing precariousness and homelessness - Proof of Canadian status is relaxed to include a guarantor's signature, OHIP and ON ID Cards - Individuals are given the option to allow their worker to contact CRA directly to check their T4s and such instead of having to fill their tax returns
	TRANSPARENCY	All programs are made transparent
		<ul style="list-style-type: none"> - All programs and their rules are described on the City's website - With clarity on who takes the decisions and how the amount of the allowances are calculated - The data from programs' reviews is published on the website too

2) ***“Entitlement” versus “Eligibility”

We emphasize that it is important to speak of “entitlement” here, not “eligibility”. From the housing worker and client's perspective, “eligibility” has to do with being eligible to *apply* for a housing allowance, which means fulfilling all pre-application requirements (currently this means: proof of status, proof of income, notice of assessment from previous year, proof of address, signed intent to rent form, clients' signature on consent forms). “Entitlement” means having been approved to receive a housing allowance of a specified amount.

3) Endorsers of our requests

We ask that Joy's modified version mention the responsibility we have towards the endorsers of our requests and vision and that these include Shelter and Justice Health Network (SHJN), Sanctuary, Workman Arts, Ontario Coalition Against Poverty (OCAP), Open Policy (John Stapleton's), Toronto Neighbourhood Centres, Income Security Advocacy Centre (ISAC), ODSP Action Coalition, ALAB Resource Clinic, All Saints Church-Community Centre, Social Assistance Coalition Scarborough (SACS) and Health Providers Against Poverty (HPAP).

4) A new recommendation to represent individuals living with disabilities

Echoing aspects of our experience, we have been witnessing the housing crisis of an ODSP recipient who has been looking for housing for 9 months now, three of which while under the Eviction Prevention in the Community Program (EPIC Program). Combined with the experience of the ODSP recipient who lived at 17 Paton Road and reports from other housing advocates, we are struck by how much of a rift there can be between ODSP recipients' intimate understanding of their lives, of their disability management, of ODSP's rules, landlords' and systemic discrimination and that of housing workers and city employees. To the 17 Paton Road ODSP recipient, SSHA offered a TCHC unit when it became obvious after 4 months that the private market was not working for them. Why, despite our efforts, hasn't this path been activated for this other ODSP recipient after 9 months of rejections by the private market? Why are there other or new barriers?

We are also alarmed that this is the case while we are witnessing, as SSHA is well aware, the implementation of fundamental changes to OW and ODSP which will bring housing services to the top priority of the roster of “life stabilisation” services recipients will be “prescribed” to receive. The changes are not transparently laid out for individuals with disabilities yet, but well versed policy analysts see it as possible that, for example, somebody on OW struggling in a housing crisis might not be given the opportunity to apply for ODSP before being housed and re-assessed for their ability to work. On OW one has to survive with \$733/month, participate in employment programs, and apply for work. On ODSP, one gets \$436 more and one's disability is treated with more respect. This makes a significant difference.

Individuals with disabilities have been deemed a priority group by other levels of government, such as in the Rapid Housing Initiative and for COBH and the City of Toronto mentions them on its information sheet about the Dunn Modular Housing Project.

All this points at SSHA's new and compounded responsibility towards people with disabilities.

Our recommendation says:

SSHA as soon as possible gathers a small group of individuals with disabilities and advocates to address the long existing misunderstanding of this demographic and to collect disability-related guidance for the future of housing allowances and for the changes of social assistance.

The two ODSP recipients mentioned in this review would be happy to help with this.

5) List of other changes

Please find attached a pdf with comments that highlight words, concepts, phrasings, and/or thinking that do not represent us and the subsequent changes we suggest.

6) Representation of our trauma

The trauma we experienced is referenced in the draft. Still, the phrasing feels too soft and we would like to suggest that the final draft uses sharper language. Examples are highlighted in the attached pdf.

Last, we are available if clarifications of this review are needed.

Contact: claudewittmann, 647 701 4301; clowittmann@gmail.com

Thank you.