

The 17 Paton Road tenants think that this report does not faithfully represent the requests they put forward, more particularly the fact that their requests form a complete vision not a shopping list of recommendations that could end up being used to support minor changes of the programs only.

Their vision starts with the overarching demand that housing allowance applicants get their full entitlement to a dignified amount of allowance before they start their housing search.

Please read their "review" of this report.

Recommendations from 17 Paton tenants on the Toronto Housing Allowance Program

Joy Connelly with Jamilla Mohamud

April 19, 2021

Executive Summary

On September 30, 2020 Toronto City Council directed "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."

The motion was prompted by the recent experience of tenants at 17 Paton Road in Toronto's west end. This long-standing community of artists was displaced when the City determined their building was illegitimately converted to a residential use and violated zoning and fire safety regulations. Despite the tenants' concerted effort to preserve the building as an affordable live-work space, including an attempt to convert the building into a non-profit co-operative, the City issued an evacuation order in March 2020, later extended to September 1, 2020.

The City of Toronto engaged WoodGreen Community Services to help eligible tenants access services and assistance to help them relocate, including housing allowances through the Toronto Transitional Housing Allowance Program (TTHAP) and offer other assistance such as Bridging Grants and housing help services.

This report examines the relocation support services, and particularly the housing allowance program, as experienced by 17 Paton tenants. In October 2020, 17 Paton tenants wrote a document entitled *"Toronto's housing allowance/benefits programs need fundamental change and the City is ready to hear our requests,"* summarizing their experiences and offering recommendations for a new approach to housing allowances.

To deepen its understanding of the 17 Paton tenant experience, the City of Toronto's Shelter, Support and Housing Division (SSHA) hired Joy Connelly to conduct a focus group with affected tenants and report the findings. Four tenants participated in-person, with another three tenants submitting written accounts of their experiences. Notes from the focus group were vetted for accuracy and completeness by the participating tenants, with the understanding that these notes would remain confidential.

Through their written materials and the focus group, 17 Paton tenants identified 16 recommendations as set out in the table below. These recommendations, along with findings of three other studies commissioned by the City in 2018-2019, will form the foundation for the SSHA's consultations with Provincial ministries to improve the Provincially-funded and administered housing allowance programs.

Recommendations from 17 Paton tenants

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| <ol style="list-style-type: none">1. Revise online information on TTHAP to include:<ul style="list-style-type: none">• the steps in the application process and the roles of the tenant, the supporting agency, the City and the Province• a copy of the application form• the eligibility criteria and the full list of requirements for documenting eligibility• the Household Income Limit, by household size• clarification on whether assets are included in a determination of eligibility• the maximum rent permitted as set out in the Average Market Rent |
|---|

<ul style="list-style-type: none"> • the maximum housing allowance available • the information that TTHAP funds could be deposited direction into tenants' bank accounts • the process for annual reviews • the end date for TTHAP (currently 2024 unless the program is renewed or replaced with a similar housing allowance program).
2. Provide Information packet to approved TTHAP applicants
3. Proof of Canadian Status is relaxed to include a guarantor's signature, OHIP and ON ID cards
4. Confirm TTHAP eligibility prior to housing search
5. Programs are conceived and funded to secure housing without compromising food and basic needs security
6. Housing allowances become a bridge to permanently affordable housing
7. Tailor agency supports to match the needs of each tenant community
8. Eliminate Rent Cap
9. Eliminate the Intent to Rent/Promise to Rent requirement
10. Enable home-sharing options
11. Decisions should be made locally, closer to the reality of applicants, and significantly streamlined
12. Frame policy within the right to housing
13. Increase tenant agency
14. Displacement as a last resort
15. Build social housing
16. Review programs biannually from the client's experience and share data with the public

INTRODUCTION

On September 30, 2020 Toronto City Council directed "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."

The motion was prompted by the recent experience of tenants at 17 Paton Road in Toronto's west end. This long-standing community of artists was displaced when the City determined their building was illegitimately converted from a commercial to residential use and violated a number of zoning and fire safety regulations. Despite a concerted effort by tenants to preserve the building as an affordable work-live space, including an attempt to convert the building into a non-profit co-operative, the City issued an evacuation order in March 2020. After a series of extensions the order was enforced on September 1, 2020.

To help tenants relocate, the City of Toronto engaged WoodGreen Community Services under their standing contract to provide Tenant Relocation Support Services (TRSS) for emergency displacements. The aim was to help support eligible tenants access appropriate assistance for relocation, which could include housing allowances through the Toronto Transitional Housing Allowance Program (TTHAP) and offer other assistance such as Bridging Grants and housing help services.

Scope:

This report examines the relocation support services, and particularly the housing allowance program, as experienced by 17 Paton tenants. In October 2020, 17 Paton tenants wrote a document entitled "*Toronto's housing allowance/benefits programs need fundamental change and the City is ready to hear our requests*" (referred to throughout this report as *Recommendations for SSHA*). The report summarizes the experiences of 17 Paton tenants and offers recommendations for a new approach to housing allowances. The report is attached in **Appendix A**.

To deepen its understanding of the 17 Paton tenant experience, the City of Toronto's Shelter, Support and Housing Division hired Joy Connelly to conduct a focus group with affected tenants and report the findings. Four tenants participated in-person, with another three tenants submitting written accounts of their experiences. Notes from the focus group taken by Jamilla Mohamud were vetted for accuracy and completeness by the participating tenants, with the understanding that these notes would remain confidential.

The recommendations in this report reflect both those raised by 17 Paton tenants during the focus group, along with supplemental materials tenants provided before and after the group met. The author has also drawn on information provided by SSHA that might not have been available to 17 Paton tenants.

Evaluation Background:

SSHA has conducted a number of recent reviews of Toronto's housing allowance programs and tenant relocation support services:

- In 2018, SSHA evaluated its Tenant Relocation Support Services Program (referred to in this report as the *2018 TRSS Evaluation*).¹ This program provided supports, including housing allowances, housing help and follow-up supports, to 69 vulnerable tenants displaced by the redevelopment of four residential hotels. A precursor to these evaluations was WoodGreen's 2015 *When Hotels are Homes* study of 30 vulnerable tenants displaced by the redevelopment of the Broadview Hotel.
- Also in 2018, SSHA commissioned a broad study of the reach, impact and effectiveness of TTHAP and other housing allowance programs (referred to in this report as the *2018 Housing Allowance Program Evaluation*).² The chief recipients of these allowances were priority households at risk of homelessness on the City's Centralized Waiting List for rent-geared-to-income housing provided by City-funded and administered social housing providers; the chronically homeless; survivors of domestic violence; and residents in subsidized units with expiring operating agreements. The study included an analysis of Provincial administrative data and a supplementary survey of 206 housing allowance recipients, as well as discussions with recipients and Provincial, City and agency staff.
- A 2019 evaluation examined the effectiveness of SSHA's Co-ordinated Access to Housing and Supports Pilot (referred to throughout this report as *2019 CAHS Evaluation*).³ From January 2017 through October 2018, this pilot helped connect more than 3500 homeless households with five services including housing allowances ranging from \$250 to \$600 per household and Bridging Grants of up to \$2500 to pay for first and last month's rents.

These studies provide valuable context for this report and, along with recommendations from 17 Paton tenants, will form the basis for SSHA's response to the September 30, 2020 Council direction.

Acknowledgements

We acknowledge the land we work on is the traditional territory of many nations including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples and is now home to many diverse First Nations, Inuit and Métis peoples. We also acknowledge that Toronto is covered by Treaty 13 with the Mississaugas of the Credit and the Williams Treaty signed with multiple Mississaugas and Chippewa bands.

The author wishes to thank the former tenants of 17 Paton and their supporters for their commitment to advancing the rights of tenants and their help in informing the improvement of Toronto's housing policies.

Thank you to the staff of the City's Shelter, Support and Housing Administration (SSHA) and their commitment to meeting the housing needs of the displaced tenants. Particular thanks to Richard Marshall, Housing Consultant, City of Toronto Housing Stability Services Unit, for his overall direction and support for this project.

¹ Emily Paradis and Joy Connelly, *Tenant Relocation Support Services Program: Final Evaluation Report*, submitted to Shelter, Housing and Support Services Administration, City of Toronto, 9 March 2018.

² SHS Consulting, *A Pathway Out of Poverty: The City of Toronto's Housing Allowance Program -- a Review*, Final Report, March 2018.

³ Emily Paradis and Joy Connelly, *Co-ordinated Access to Housing and Supports Pilot Evaluation*, Final Report, June 2019.

FINDINGS FROM THE FOCUS GROUP

1. The trauma of displacement

The focus of this report is the experience of 17 Paton tenants with TTHAP and the TRSS program. However, this experience cannot be separated from the sense of loss and trauma that underpinned the 17 Paton relocation.

Through the 17 Paton *Recommendations for SSHA*, the focus group and written submissions, tenants spoke of the shock of the evacuation order, the two-year effort to save their homes, the uncertainty and confusion surrounding the relocation process, the challenges of searching for housing in a difficult rental market during a pandemic, and the loss of work and opportunities occasioned by the move. Some tenants did not wish to participate in this review simply because they wanted to break away from the traces left by the experience.

All displacement is disruptive, but there were factors that made this displacement particularly painful. For its tenants, 17 Paton was more than a series of rooms or apartments. It was an established community where tenants had known each other for many years. 17 Paton was also the workplace for many tenants. When 17 Paton was closed, they lost not only their homes but also their means of earning an income.

This back-story profoundly affected the experience of the entire relocation process. It also distinguished the 17 Paton experience from that of some other TTHAP applicants and TRSS clients who may see housing allowances as an opportunity to exchange a shelter bed or a dilapidated room for a self-contained apartment.

2. Tenants' introduction to the TTHAP Program

Tenants at 17 Paton were introduced to TTHAP through WoodGreen Community Services, a multi-service agency contracted by the City of Toronto to provide relocation supports.

WoodGreen staff were invited to a tenant meeting hosted by the local Councillor, Deputy Mayor Ana Bailao. At that meeting, tenants learned about the services WoodGreen offered, the availability of TTHAP, and the assurance that "they would be taken care of" in their efforts to secure alternative housing. What was missing for many 17 Paton tenants was concrete information on program details: who was eligible, what funds were available, and how to access these funds. This experience led 17 Paton tenants to recommend a number of changes to promote greater transparency.

Tailor agency supports to match the needs of each tenant community

At its first meeting with 17 Paton tenants, WoodGreen acknowledged that working with a community of artists was a new experience for them.

17 Paton tenants also felt that WoodGreen was not the right match for their community. First, they observed that WoodGreen could not bring the specific expertise needed to assess

their eligibility for housing allowances. Focus group participants cited such complexities as:

- the inherent unpredictability of artists' incomes that were dependent on the art market and granting agencies
- the role of savings in enabling artists to manage these variations in income. For example, an artist might rely on sales at an exhibition to sustain them over three or four years. However, it appeared that these revenues were treated as income for the current year, making tenants whose income had never exceeded the program's Household Income Limits – including a household that had run out of Employment Insurance and short-term disability – ineligible for housing allowances
- multiple incomes sources including self-employment, self-employment combined with other employment, and self-employment combined with art sources
- the difficulty in replacing live-work space when there was no mechanism to distinguish the rent for housing subject to TTHAP's rent cap, and the rent for the studio portion of the unit.

The result was that some low-income tenants were deemed ineligible for TTHAP.

Second, there appeared to be a mis-match between 17 Paton tenants' expectations of WoodGreen and what may have been WoodGreen's usual approach to supporting displaced tenants. The *2018 TRSS Evaluation* found that agencies supporting vulnerable tenants, typically navigate the TTHAP referral and application and the housing search on tenants' behalf. For vulnerable tenants who lacked the capacity or confidence to act on their own, a "just tell me what I need to know when I need to know it" approach may have been comforting. For 17 Paton tenants it was "hugely stressful."

17 Paton tenants had both the desire and the capacity to take charge of their own affairs. They wanted an overview of the process and their own role in it. They noted that information was available only in bits and pieces. Some information seemed to be inconsistent with information other tenants received, leaving tenants wondering whether WoodGreen may not have had access to the correct information themselves.

Provide clear written information at the outset

17 Paton tenants recommended written materials, available online and distributed directly to relocating tenants, that clearly outlined the key features of the TTHAP program, including:

- the steps in the application process and the roles of the tenant, the supporting agency, the City and the Province
- a copy of the application form
- the eligibility criteria and the full list of requirements for documenting eligibility
- the Household Income Limit, by household size
- clarification on whether assets are included in a determination of eligibility
- the maximum rent permitted as set out in the Average Market Rent
- the maximum housing allowance available
- the information that TTHAP funds could be deposited directly into tenants' bank accounts
- the process for annual reviews
- the end date for TTHAP (currently 2024 unless the program is renewed or replaced with a similar housing allowance program).

Clarify the distinctions among housing allowance programs

Housing allowances are widely used for a variety of purposes: to make rents more affordable for sitting tenants, to prevent evictions, to house people living in shelters or encampments, and to enable relocated tenants to find new housing. These needs are addressed through a variety of programs and funding pools.

The subtle differences among programs may have led to confusion both among tenants and possibly WoodGreen itself. For example, 17 Paton tenants noted that a *pdf of guidelines* received after the relocation suggested that some programs enable tenants to fill out their own applications for housing allowances, which was not a possibility with TTHAP, and receive funds through direct deposit, an option that was available but apparently not offered to 17 Paton tenants.

Publish information on all paths to housing allowances and relocation supports online

Over the course of the relocation process 17 Paton tenants sought online information about housing allowance programs. However, online information on these programs was not sufficient to enable individuals to understand how the programs worked, whom they were designed to serve or how to access them.

Tenants recommended that information on all housing allowances and relocation supports, such as TRSS, Eviction Prevention in the Community (EPIC) program, and other programs be posted online. It should be noted, however, that most housing allowance programs administered by the City are dedicated to specific needs or client groups and do not involve an open application process.

3. Completing the referral and application forms

The path to a successful application is a complicated one involving the tenant, a support agency's housing worker and site lead, the prospective landlord, the City's Housing Stability Services (HSS) staff, and the Provincial Ministry of Finance. The steps include:

- assessing the needs and eligibility of displaced tenants
- helping eligible clients find a new home and ensure the new rent is equal to or below the Average Market Rent as reported by Canada Mortgage and Housing Corporation
- completing a Toronto Housing Allowance referral form and collect all supporting documents, including identification and verification of the client's status, income verification, the notice of assessment and verification of the new address through either a signed lease or letter of intent
- forwarding the package to the agency's site lead to approve and forward to Housing Stability Services.

Housing Stability Services staff then review the referral to ensure Provincial and City of Toronto eligibility criteria are met, ensure all documentation is complete, and pre-populates the provincial application form. HSS then sends the package back to the agency, which contacts the tenant to complete and sign the application and applicable schedules,

and then sends the completed application back through the agency site lead and HSS to submit to the Ministry of Finance for processing.

Clarify the minimum and maximum housing allowance available

For 17 Paton tenants, the **most stressful element in the entire program** was not knowing how much housing allowance was available to them. Without this key information, they were operating "in the dark," searching for a home without knowing how much money they had to spend on rent.

Focus group participants referred to a "mysterious algorithm" necessary to calculate the amount of the housing allowance that could be completed only when a new unit had been secured. For example, one tenant learned from WoodGreen that it would not be possible to identify the subsidy amount "because this will depend on the information that is input into the algorithm with the province." Tenants did not know, and still do not know, what the algorithm is, but wondered whether it is a feature of the Canada-Ontario Housing Benefit (COHB) but not pertinent to TTHAP.

Every housing benefit program includes guidelines for establishing the benefit amount based on a few key parameters. Clarifying this information at the outset would have enabled tenants to seek out a unit they could afford with confidence.

Offer a variety of ways to document eligibility

To be eligible for TTHAP, 17 Paton applicants needed to demonstrate: 1) their status in Canada, 2) they have filed the previous year's income tax returns, 3) they are a resident of Toronto, 4) they are not currently receiving rent-geared-to-income assistance, 5) they are paying more than 30% of adjusted family net income towards rent, 6) they do not have arrears with a social housing provider or they have an active repayment plan, 7) they do not own a home suitable for year-round occupation, 8) they were living at 17 Paton at the time the City determined the building would close. The TTHAP application form also requires the applicant's consent to give the Province access to Canada Revenue Agency (CRA) accounts and to confirm receipt of other public funds such as ODSP.

The eviction also coincided with April 30th income tax filing date, so tenants had to scramble to complete their income tax returns while in the midst of preparing to move. However, focus group participants did not have difficulty providing the required documentation with the exception of verifying income for the reasons set out on page 7.

Focus group participants did note that some of the documentation required, such as proof of status in Canada, would be onerous for homeless applicants who may have neither a passport nor a birth certificate and would need assistance completing income tax returns. 17 Paton tenants also had concerns with sending sensitive financial data that could be used for ID theft. Some resolved that challenge by encrypting their PDFs with a password every time they were mailed, but recognized that many would not have the resources or skills to do the same.

Focus group participants recommended:

- Proof of Canadian Status be relaxed to include a guarantor's signature, OHIP and ON ID cards
- Individuals be given the option to give consent that their Canada Revenue Agency account be consulted to check their income instead of filing their tax return and

- providing proof of income. The aim would be to reduce the stress of filling out the CRA form in the moment
- Simplify the required income verification. In some cases participants were asked to supply both the CRA Notice of Assessment plus three months of bank statements. One type of verification should be sufficient.

Consider a Rent-Geared-to Income approach to housing allowances

The *Suggestions for SSHA* document observes that, unlike rent-geared-to-income housing, fixed housing allowances "displace housing insecurity onto food and basic needs insecurity for those with the lowest incomes." Those who stay in a shelter, couch surf or live in rent-geared-to-income housing have money for food. Those who live in even the smallest, most inadequate bachelor apartments, and have only \$500 housing allowance to contribute to a \$1200 rent must forego food to pay for rent.

Focus group participants believed RGI-style housing allowances, where those who have less money receive more than those with higher incomes, are the fairest way to bridge the gap between rents and incomes. When asked who would administer the subsidy in the absence of a social housing landlord, focus group participants recommended the subsidy be publicly administered through the City or through the income tax system.

4. Securing a new home

Unlike TRSS participants in other buildings who rely more heavily on the support agency's housing help services, 17 Paton tenants conducted their own search for alternative housing, with WoodGreen's assistance limited to providing listings for Kijiji and similar sites.

All focus group participants found the search for a new home extremely challenging. Beyond the challenges of seeking housing during a pandemic, they were confronted with rents that were much higher than those at 17 Paton with very few live-work options. However, the greatest source of stress was the design of the TTHAP program, which tenants found to be opaque and disempowering, and compelled them to take significant risks before receiving a housing allowance. 17 Paton tenants recommended the following improvements to the process.

Equip tenants to search for housing

To successfully find a home they can afford, tenants need to know **before they begin their search**:

- that they are eligible to receive subsidy
- the exact amount they are eligible to receive
- their capacity to pay first and last month's rent, and
- a clear understanding of the yearly review process.

Focus group participants recommended that supports to budget for their choice of housing be offered independently from the application process, either through SSHA directly or through an agency familiar with the specific issues faced by the client group.

Eliminate the rent cap

17 Paton tenants understood from WoodGreen that, for the tenant to receive a housing allowance, the rent in their new home must be no higher than the Average Market Rent.

Focus group participants questioned the value of a rent cap. They understood the rent cap's purpose was to ensure tenants do not commit themselves to rents they cannot afford. They found this rationale to be patronizing, suggesting that tenants were fraudsters or could not manage their money, or that any rent above the rent cap was indulgent or exorbitant, rather than simply the only practical choice available. They argued the program should start from the perspective that everyone can budget if they know how much money they have. If the goal of the rent cap is to limit the subsidy's impact on rent inflation, the solution is rent controls.

If a rent cap is used, participants urged the standard be set at the Average Market Rent (AMR) for **vacant units only** to accurately reflect the housing actually available to them. They also recommended that the district AMR, rather than the City-wide or GTA-wide AMR be used, to reflect the choices actually available in the city centre.

Focus group participants reiterated the importance of knowing the rules at the outset. For example, some tenants had an early impression that the rent cap was individualized because different tenants were receiving different information. In another example, a tenant found a place that was \$50 over the rent cap but refused it – even though the program allows for some flexibility – for fear of losing their housing allowance.

Eliminate the Intent to Rent/Promise to Rent requirement

Under the current protocol, TTHAP applicants are required to obtain their prospective landlord's signature on a Letter of Intent before completing the application to receive funds.

All focus group participants found this requirement humiliating and disempowering. Even a participant whose prospective landlord was a friend found the experience awkward and shaming.

It also opens the door for discrimination. Although the *Ontario Human Rights Code* prohibits discrimination on the basis of receipt of social assistance the practice remains common. 17 Paton tenants noted the required Letter of Intent informed prospective landlords the applicant relies on public assistance to afford the rent does not have the money in hand to secure first and last month's rent. It also requires the tenant to ask the landlord to trust them to come up with the money. 17 Paton tenants reported landlords hanging up on them because they were ODSP recipients, backing away when they learned about TTHAP or refusing to get involved in a "bureaucratic hassle."

Prioritize displaced people on the City's Centralized Waiting List

Focus group participants understood from tenant meetings with WoodGreen that they would have access to RGI housing. In reality, no tenants were housed in a rent-geared-to-income unit. One tenant did relocate to a market rent unit in a Toronto Community Housing building, where rents were lower than in the private sector and the landlord was thought to be less likely to evict.

One participant identified an RGI unit in an Artscape building and gathered considerable public support, including 280 signatures on a petition, to obtain the unit. However, the City

allocates RGI units according to their Centralized Waiting List. It took 60 days for the applicant to receive the response that the request for the unit had been refused. It should be noted that during this time Access to Housing staff had been redeployed to aid in the City's COVID-19 response, which may have accounted for administrative delays.

17 Paton tenants researched the City's capacity to make local rules to prioritize high-need groups. They observed that a 2017 Auditor-General Report reported two of 47 service managers in Ontario prioritized households at risk of eviction. They also submitted an example from Sudbury's local rules designating urgent status to households meeting one or more of six criteria, including "persons living in substandard housing which had been condemned by the municipality, for example, property standard violations which require that the unit be vacated in order to complete the work, confirmed by a Court Order or an Order of the Ontario Rental Housing Tribunal."

Enable home-sharing options

Focus group participants noted that shared housing was the most affordable option available in the private market. However, one tenant's application to share a unit with a roommate was refused. It is unclear whether the applicant did not know that the landlord's consent was required or whether the landlord refused to consent to the tenancy.

5. Receiving and renewing housing allowances

For 17 Paton tenants, one of the most stressful elements of the TTHAP program was signing a lease before they were confident they would receive a housing allowance or a Bridging Grant to cover first and last month's rent.

Among focus group participants the gap between securing a tenancy and receiving TTHAP ranged from two weeks to 45 days. Some paid first and last month's rent out-of-pocket or borrowed money from a parent or a friend. In contrast, one tenant applied for and received first and last month's rent in one day from the Housing Stabilization Fund – a fund available only to people receiving social assistance. Due to pandemic related restrictions, the option to pick up a Bridging Grant cheque for first and last month's rent within 24 to 48 hours was not available. One focus group member had understood that the Bridging Grant would pay for moving costs, but later learned they were ineligible because they did not apply for TTHAP.

Finally, 17 Paton tenants observed that the option to have their housing allowances paid directly to the landlord increased the power imbalance already inherent in the landlord-tenant relationship, and implied the tenant was not capable of managing their money. In cases where a Bridging Grant was accessed and paid directly to the landlord, it was confusing to the landlord to receive rent cheques from both the City and the tenant rather than a single rent payment.

Living with an uncertain future

The annual review was seen as a nuisance, particularly in the case of 17 Paton tenants who were required to renew their application within one month of being approved for TTHAP to conform to the Province's annual cycle.

A much deeper issue was the uncertainty created by both the annual review and particularly the expiration of the TTHAP program in 2024. This risk of losing TTHAP, with no reason to believe they will be in a better position to afford their rent in three years, meant tenants could not put the stress of displacement behind them. Based on their experience, 17 Paton tenants made the following recommendations.

Decisions should be made locally, closer to the reality of applicants, and significantly streamlined

17 Paton tenants found that TTHAP's multi-level, multi-step approvals process was an opportunity to "fail on so many levels." They recommended that the City reclaim full decision-making authority from the Province and consider hiring staff to process applications directly.

Use housing allowances as a bridge to securing permanently affordable housing

Because funding for long-term housing allowances has not been secured, 17 Paton tenants recommended that TTHAP facilitate the transition to permanently affordable home. Specifically, 17 Paton tenants recommended:

- conceiving of yearly reviews with housing security as a top priority
- increasing the housing allowance amount when incomes decrease
- guaranteeing housing allowance recipients an RGI unit when the program ends
- ensuring recipients in all housing allowance programs are not taken off the City's Centralized Waiting List for social housing. Currently only recipients of the Canada Ontario Housing Benefit (COHB) program are removed from the waiting list.

6. Tenant outcomes

The majority of 17 Paton tenants did not end up receiving housing allowances. This was due to a variety of reasons: some did not apply, some were found ineligible, and some abandoned the application process. Although there is no complete account of 17 Paton tenants' take-up of the TTHAP program or client outcomes, information from WoodGreen suggests the following:

1. Among approximately 20 tenant households living at 17 Paton, 7 did not respond to WoodGreen's offer of support.
2. Of the approximately 13 households who did respond to WoodGreen's offer of support:
 - Four received a housing allowance of \$500. Of these four, three secured a home in the private rental market and one was housed in a market rent unit in social housing.
 - One was in the process of securing a social housing unit at the time WoodGreen's information was available.
 - Three were deemed ineligible because their incomes exceeded program limits.
 - Four abandoned the application process. Among these, two found homes that were over the rent cap.
 - The remaining tenants were not accounted for.

Among the seven 17 Paton tenants participating in the focus group or submitting written comments:

- one did not qualify and moved outside Toronto
- one did not apply because the process seemed "daunting and overwhelming"
- one did not pursue because of confusion about the status of savings from grants and shows in preceding years
- one moved in with family
- one received TTHAP but is paying twice the rent that they were paying at 17 Paton for a home that does not accommodate work space
- one received TTHAP and is paying a similar rent to 17 Paton but will be unable to afford the unit should the TTHAP program expire
- one received TTHAP and is paying less rent for an improved space.

7. The hope for a transformed system

Participants introduced the 17 Paton focus group with a written statement calling for a "transformative outcome" for the focus group. This transformative outcome would "provide safe and adequate housing to those of us still in unsafe or short-term situations," with the path to that outcome informing "how to really relocate other tenants in the future." Another transformative outcome would be to "deeply transform TTHAP/housing allowance benefits programs" from a process the participants described as "profoundly flawed and that adjustments will not help."

This report has highlighted the program and policy recommendations that would promote transparency, streamline and simplify processes, and reduce precarity and stress at each stage of the relocation process. In addition to these recommendation, tenants of 17 Paton suggest the following system-level changes intended to achieve "deep transformation."

Frame policy within the right to housing

17 Paton tenants did not elaborate on this recommendation. However, the Toronto Housing Charter - Opportunity for All (the *Charter*)⁴ identifies some elements of the right to housing that speak to the experiences and recommendations of 17 Paton tenants.

The *Charter* states, "It is the policy of the City of Toronto to recognize that housing is essential to the inherent dignity and well-being of the person and to building sustainable communities. The City of Toronto supports improved outcomes for its residents" (p. 22).

The principles underpinning the *Charter* include the "right to a safe, secure, affordable home in which they can live in peace and dignity and realize their full potential," and the "right to housing that is accessible and takes into account their expression of cultural identity and way of life." The Charter observes that all residents, whether they rent a home, own a home, or are experiencing homelessness; have an equal stake and voice in Toronto's future and to

⁴ City of Toronto, *HousingTO 2020-2030 Action Plan*. <https://www.toronto.ca/wp-content/uploads/2020/04/94f0-housing-to-2020-2030-action-plan-housing-secretariat.pdf>

effective participation in decisions and policies affecting their communities and their housing" (p. 24).

Toronto's 2020 - 2030 Housing Action Plan also commits the City to screen and assess City decisions, policies, services and programs to align them with the *Charter*, and to provide for participation by members of affected communities in decision-making related to housing" (p. 25).

Increase tenant agency

17 Paton tenants recommended that the TTHAP program be reviewed so that every step in the program promotes tenant agency.

This theme runs through many of the specific recommendations in this report: that all processes and eligibility rules are clear at the outset; that applicants have secured a housing allowance for a specific amount before they begin their housing search; that programs are conceived and funded to secure housing without compromising food and basic needs security; and that housing allowances become a bridge to permanently affordable housing.

Displacement as a last resort

Focus group participants observed they were already living in deeply affordable housing until the City closed 17 Paton in response to zoning and building safety concerns. Avoiding this displacement would have preserved a small but valuable portion of the affordable housing stock and eliminated the need for public subsidies.

Focus group participants argued they, as the people who lived in the building, had a stake in the building's future, but they would not have been engaged in the process had they not organized themselves. They also felt that greater creativity at all levels could have made it possible to improve the building's safety or convert it to social housing. As it was, they felt blind-sided by the eviction order. And unlike private owners who demolish and redevelop a rental building, the City is not required to replace rental units it closes to enforce regulations and standards.

Build social housing

17 Paton tenants were emphatic that housing allowances and benefit programs do not replace the need to build more social housing. Only permanently affordable housing offers the stability and security tenants need.

Review programs biannually from the client's experience and share data with the public

This recommendation was not discussed during the focus group but it represents one of the key recommendations from the *Recommendations for SSHA* document.

It is also consistent with the HousingTO 2020 - 2030 Action Plan's commitment to regularly publish reports on its plans, actions, target and progress in relation to the housing strategy and ensure these reports are available to all residents and other stakeholders in appropriate and accessible formats.⁵

⁵ City of Toronto, *HousingTO 2020-2030 Action Plan*, p. 25. <https://www.toronto.ca/wp-content/uploads/2020/04/94f0-housing-to-2020-2030-action-plan-housing-secretariat.pdf>

NEXT STEPS

Through their participation in the focus group and their written materials, the former tenants of 17 Paton have provided SSHA with 16 recommendations to improve TTHAP and relocation supports.

This is SSHA's first step in fulfilling City Council's direction 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 Provincially funded and administered housing allowance programs."

SSHA's second step is to hire a consultant to review three related studies SSHA commissioned in 2018 and 2019: the 2018 *Tenant Relocation Support Services Program: Final Evaluation Report*; the 2018 *A Pathway Out of Poverty: The City of Toronto's Housing Allowance Program – a Review*; and the 2019 *Co-ordinated Access to Housing and Supports Pilot Evaluation*. Lessons learned through these studies, combined with recommendations from 17 Paton tenants, will be synthesized into a final report. This report will form the foundation of both the City's engagement with the Ministries of Finance and Municipal Affairs and Housing on program elements that fall within Provincial jurisdiction and the development of Shelter, Support and Housing Administration's 5 year Service Plan, currently under development.

Recommendations from 17 Paton tenants

1. Revise online information on TTHAP to include: <ul style="list-style-type: none">• the steps in the application process and the roles of the tenant, the supporting agency, the City and the Province• a copy of the application form• the eligibility criteria and the full list of requirements for documenting eligibility• the Household Income Limit, by household size• clarification on whether assets are included in a determination of eligibility• the maximum rent permitted as set out in the Average Market Rent• the maximum housing allowance available• the information that TTHAP funds could be deposited direction into tenants' bank accounts• the process for annual reviews• the end date for TTHAP (currently 2024 unless the program is renewed or replaced with a similar housing allowance program).
2. Provide Information packet to approved TTHAP applicants
3. Proof of Canadian Status is relaxed to include a guarantor's signature, OHIP and ON ID cards
4. Confirm TTHAP eligibility prior to housing search
5. Programs are conceived and funded to secure housing without compromising food and basic needs security
6. Housing allowances become a bridge to permanently affordable housing

7. Tailor agency supports to match the needs of each tenant community
8. Eliminate Rent Cap
9. Eliminate the Intent to Rent/Promise to Rent requirement
10. Enable home-sharing options
11. Decisions should be made locally, closer to the reality of applicants, and significantly streamlined
12. Frame policy within the right to housing
13. Increase tenant agency
14. Displacement as a last resort
15. Build social housing
16. Review programs biannually from the client's experience and share data with the public