

# Managers' Reports

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# Request for Recommendation Priorities Committee



## Type of Decision

Meeting Date	October 22, 2003				Report Date	October 10, 2003			
Recommendation	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	Priority	<input checked="" type="checkbox"/>	High	<input type="checkbox"/>	Low
	Direction Only				Type of Meeting	<input checked="" type="checkbox"/>	Open	<input type="checkbox"/>	Closed

## Report Title

Establishment of Local Social Housing Policies

### Policy Implications + Budget Impact

<input checked="" type="checkbox"/>	This report and recommendation(s) have been reviewed by the Finance Division and the funding source has been identified
<input checked="" type="checkbox"/>	Background attached

### Recommendation

That the City of Greater Sudbury approve the adoption of the Local Social Housing Policies as outlined in the report dated October 10, 2003, from the General Manager of Economic Development and Planning Services.

<input checked="" type="checkbox"/>	Recommendation attached
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### Recommended by the General Manager

  
D. Nadorozny, General Manager of  
Economic Development and Planning Services

### Recommended by the C.A.O.

  
Mark Miato  
Chief Administrative Officer

Date: October 10, 2003

**Report Authored By**

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**Division Review**

*W.E. Lautenbach*

W.E. Lautenbach  
Director of Planning Services

**EXECUTIVE SUMMARY**

The Social Housing Reform Act, 2000 (SHRA) and its associated regulations designate the City of Greater Sudbury as the Service Manager for the administration of the Provincial Non-Profit and Federal Housing programs transferred from the Province.

Both the SHRA and the Regulations require the Service Manager to establish local policies for rent-geared-to-income (RGI) households in several key areas.

This report includes explanations of these areas, the related sections of the regulations and the recommendation regarding each area.

Listed below are the "areas of flexibility" for which local policies need to be established.

1. Local Occupancy Standards - ie. the size of unit a RGI household may occupy.
2. Household Income Limits - the option of setting a maximum income level an RGI applicant can have and still remain eligible to receive RGI assistance.
3. Household Asset Limits - the option of setting a maximum asset limit an RGI applicant may have and still remain eligible to receive RGI assistance.
4. Absence from Unit - the amount of time all members of a household can be absent from their unit and remain eligible for RGI assistance.
5. Misrepresentation of Income and Fraud - the option to extend the Provincial two (2) year ineligibility period for households who defraud the system.
6. Rent Changes - the option of establishing a policy on implementing rent increases of less than \$10.00.
7. Market Rent Households Requesting RGI Assistance - the option of granting a date for a current market rent household experiencing economic hardship who apply for RGI assistance according to their original date of application to the project rather than using the current date.
8. Inclusion of Additional Priority Access Group - Urgent Status - the option of recognizing those in urgent need for RGI accommodation through the adoption of a priority access category within the centralized wait list.
9. Subsidy Reimbursement - the reimbursement of subsidy overpayments to the Service Manager in situations of administrative error.

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- 10. Divestment of Residential Property - the option to extend the length of time an RGI applicant is given to divest themselves of any interest in residential property beyond the Provincial standard of 180 days.
- 11. Notice of Change - the option of extending the period of time an RGI household has to report any change in their circumstances from the provincial standard of 10 days.
- 12. Earliest Date of Application - the option of using an RGI applicant's earliest application date for social housing for all projects the applicant has applied to.

A community based work group was struck by Housing Services to assist with the development of the proposed local policies. The Social Housing Work Group is comprised of representatives from the Non-Profit and Co-operative, Federal and Supportive Housing sectors. It also included representatives from the Greater Sudbury Housing Corporation. All workgroup representatives are nominated by the members of their respective (constituent) housing sectors. The representatives report back to their sectors on a regular basis on the progress of the Work Group.

Throughout 2002-03, Housing Services held regular consultation meetings with the Social Housing Work Group. The Work Group provided an opportunity for all housing providers to participate in well balanced discussions on the need for local rules for the RGI program. The Work Group examined issues and concerns surrounding local areas of flexibility and developed recommendations for the local priority household categories. The Work Group continues to meet regularly to discuss issues of mutual concern in the day-to-day management and administration of the social housing program.

In December 2002, two public stakeholder consultation sessions were held to introduce the Work Group's proposed recommendations for the establishment of local rules to the community. The consultations were well attended and attracted a variety of interested stakeholders; for example, staff and board members of non-profit housing providers, social service agency staff - Legal Aid, Ontario Works, Children's Aid, as well as tenants and applicants. The discussion topics covered a range of options for the development of local rules.

The following table summarizes the existing policies and the proposed recommendations. These reflect the discussion and the consensus of opinion of the Work Group and the stakeholder consultation.

Policy Title	Current Policy	Recommendation
1. Occupancy Standards	Provincial Standard: - couples share a bedroom - one bedroom per additional household member - special consideration for medical conditions.	Adopt Provincial standard.
2. Household Income Limits	No set policy.	No income limit be imposed at this time.
3. Asset Limits	No set policy.	No asset limit be imposed at this time.

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Policy Title	Current Policy	Recommendation
4. Absence from Unit	No set policy.	No maximum absence period be imposed at this time
5. Disqualification Period for Misrepresentation & Fraud	Provincial Standard: ineligible for a minimum of two (2) years.	Adopt provincial standard
6. Rent Changes of \$10.00 or less	No set policy. Previous social housing program permitted the housing provider to elect not to take rent increases of less than \$10 at a periodic review.	Rent increases of less than \$10.00 will only be taken upon annual review
7. Ranking date of existing Market Rent Households seeking RGI assistance	Provincial Standard: consider household as a new RGI applicant with current date as date of application.	Award applicants who meet criteria their original date of application to program rather than current date.
8. Additional Priority Access Group	Provincial Standard: only one priority group - victims of family violence.	Priority will be given to victims of family violence and second priority category will be granted to households deemed Urgent ie. Homeless.
9. Subsidy Reimbursement of Service Manager	Provincial Standard: household required to repay any over payment of subsidy.	Over payments that resulted from provider administrative error will not be required to be repaid by the tenant.
10. Time period to Divest Interest in Residential Property	Provincial Standard: must divest interest within 180 days of receiving RGI assistance.	Adopt provincial standard.
11. Notice of Change	Provincial Standard: all changes must be reported within 10 working days.	Report and provide verification of all changes in circumstances within 30 calendar days.
12. Earliest date of Application	Provincial Standard: the ranking date for a household is the date the household applied for RGI assistance.	Adopt the provincial standard.

Full details of the workgroup discussions and consultations are included in the background report. The policies can be re-examined should local circumstances or new provincial regulations require.

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## BACKGROUND

### 1. Policy: Occupancy Standards

**Legislative Reference:** SHRA s. 76 (4) (5)  
O. Reg. 298/01 s. 27 & s. 28

The provincial occupancy standards for RGI housing are outlined in O. Reg. 298/01. The regulations establish a range of occupancy standards, from smallest to largest unit for which a household is eligible to receive RGI assistance. The Service Manager has the flexibility to establish occupancy standards to replace the existing provincial standards.

The Service Manager can decide to set different standards for different locations, or for different programs (eg. different standards for public housing, rent supplement programs or "former provincial/federal - provincial" units). The Service Manager could establish standards more stringent than the provincial standards. If the service manager does not establish a local occupancy standard the provincial standards will continue to be in effect.

### Analysis

The intent of setting occupancy standards is to match household size with the appropriate unit. The desire is to make optimum use of limited resource - RGI housing - by avoiding overhousing and avoid making people underhoused. Occupancy standards do not apply to market rent households.

#### The Provincial Occupancy Standards

##### Largest unit

1. one bedroom for spouses (including same sex partners).
2. one bedroom for each additional member of the household.
3. an additional bedroom if it is needed for:
  - a person with a disability or medical condition
  - storage of equipment needed by a disabled or ill person
  - a support worker
  - an unborn child if a household member is pregnant
  - to fulfill a joint custody agreement for a child who is not a household member.

The smallest unit a household can have is:

1. One bedroom for every two household members.
2. An additional bedroom if there is an odd number of members in the household.
3. A couple can share a bachelor unit.

A full time student living away from home, but returning home when not attending school, is considered a member of the household.

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The Social Housing Work Group felt that adoption of the provincial standard gives both the housing providers and the applicants/tenants the greatest flexibility. The provincial range spans both federal and provincial units so each housing provider can keep its current standards.

Applicants will be allowed to choose which size unit they will accept within the range they are eligible for. The regulations also say that applicants that do not choose a preferred size will be deemed to prefer the largest unit for which they are eligible. Introducing tighter occupancy standards ie. two people per bedroom, where the existing standard is one person per bedroom could place a large number of existing households (in situ) into an overhoused position.

Forcing the resulting overhoused households to move would have a financial impact on the households, housing providers and ultimately increased costs to the Service Manager. Tightening occupancy standards could possibly increase the units available to larger families. However, increasing the number of people living in a unit can also increase the maintenance (more wear and tear) and utility costs for the provider. The existing wait lists for large units 4 and 5 bedrooms are not lengthy. Some providers are currently reporting difficulty in renting the larger units.

### **Recommendation**

**It is recommended that the provincial standard be adopted and applied to all social housing providers within the City of Greater Sudbury.**

## **2. Policy: Income Limits**

**Legislative Reference:** SHRA 2000 O. Reg. 298/01 s. 8 (7) to (10)

Service Managers have been given the flexibility to decide whether or not to establish a maximum income limit that a household can have and be eligible for RGI assistance. If established, an income limit would have the effect of making a household ineligible for RGI assistance if the gross household income exceed the limit set. There is no requirement that a limit be established.

### **Analysis**

The legislation allows a Service Manager to set an income limit for households to be eligible for RGI assistance. A Service Manager may exclude certain types of income from the calculation of household income for the purposes of applying income limits.

Setting income limits has the effect of eliminating the eligibility of those households who require only a small amount of RGI assistance - or shallow subsidy. These households could potentially "fall through the gap" - they could become ineligible to receive RGI assistance because their income is over the income limit while at the same time be unable to afford market rent. The social housing program always encouraged income mixed communities. By implementing a limit, the benefits of income mixing would be lost and the complexion of social housing communities would be changed. The establishment of an income limit would also have an effect of increasing the level of subsidy provided by the service manager to housing providers.

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Based on information available on existing RGI households, waiting list data and in consultation with the Social Housing Work Group and community stakeholders, the need to establish a local income limit has not been identified. Applicants and tenants with substantial incomes are not traditionally attracted to local social housing communities.

### **Recommendation**

**It is recommended that no income limit be established for the social housing program in the City of Greater Sudbury at this time.**

### **3. Policy: Asset Limits**

**Legislative Reference:** SHRA 2000 s. 66, s75 O.Reg. 298/01 s.8 (11) (12) (13)

Service Managers have the flexibility to decide whether or not to establish a maximum asset limit that a household can have and be eligible for RGI assistance. It further provides that the Service Manager may exempt certain types of assets from consideration under local asset limits. Should an asset limit be established, it cannot be less than \$20,000 per household. If established, an asset limit would have the effect of making a household ineligible for RGI assistance if the gross household income/or assets exceed the limit set. There is no requirement that a limit be established.

### **Analysis**

Based on the information available, there doesn't appear to be a need to establish a local asset limit. Applicants and tenants with significant assets have not traditionally been attracted to local social housing communities. The establishment of an asset limit was viewed as an artificial barrier to accessing the social housing program.

It was also recognized that some households depend on their assets to live. Trust accounts may have been established to assist disabled adults. Mother led families may rely on lump sum divorce settlements. Seniors may depend on the sale of the family home and their life savings to support them on an ongoing basis. Forcing individuals to dispose of or exhaust their assets in order to secure RGI assistance increases their vulnerability.

As an example; a young adult who has a permanent disability as a result of a car accident could receive a \$100,000 lump sum settlement. This individual would not qualify to receive assistance from Ontario Works or Ontario Disability Support Program or RGI assistance if an asset limit were established.

### **Recommendation**

**It is recommended that no asset limit be established for the City of Greater Sudbury at this time.**

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#### **4. Policy: Absence from Unit**

**Legislative Reference:** SHRA, O.Reg. 298/01 s. 13

O. Reg. 298/01 Section 13 allows the Service Manager to establish a limit to the number of days that a RGI household can be absent from their unit and continue to be eligible for RGI assistance. A Service Manager cannot establish a maximum absence period that is less than 60 consecutive days.

#### **Analysis**

Under the previous social housing program, there was no restriction on the amount of time a household could be absent from their unit and remain eligible to receive RGI assistance. Households could be away from their units for lengthy periods of time for a variety of reasons. For example: a household could be absent to pursue study or short term employment opportunities, vacation ("snow birds") or to attend family obligations.

Extended absences from the unit was not identified as an issue in this community by the Social Housing Work Group or through stakeholder consultation.

#### **Recommendation**

**It is recommended that no maximum absence period be established for the Greater Sudbury area at this time.**

#### **5. Policy: Re-application - Fraud and Misrepresentation of Income**

**Legislative Reference:** O. Reg. 298/01 s. 16 (1) & 17 (1)

O. Reg. 298/01s. 16 specifies that a household is determined to be ineligible for RGI assistance and cannot apply for RGI assistance for a period of two (2) years following:

- a conviction for a rent geared to income offence under the Criminal Code or section 85 of the Social Housing Reform Act; or
- it was found by the Ontario Rental Housing Tribunal to have misrepresented its income for rent geared to income purposes.

The Service Manager can extend the period of ineligibility to more than two years.

#### **Analysis**

In consultation with the Social Housing Work Group and community stakeholders, no benefit was identified to warrant an extension of the ineligibility period beyond 2 years. Fraud and or misrepresentation of income is not a prevalent problem for housing providers in this community. Housing providers will take action against any household suspected of fraud or misrepresentation of income through the Ontario Rental Housing Tribunal or Courts.

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## Recommendation

**It is recommended that the provincial legislated period of ineligibility of two years be adopted for those household found guilty of fraud or misrepresentation of income.**

### **6. Policy: Implementing Rent Increases of \$10.00 or Less**

**Legislative Reference:** O. Reg. 298/01 s.52 (9), O. Reg. 298/01 s. 53 (4),  
O. Reg. 298/01 sections 52 and 53, O. Reg 298/01 s.52, s.53

## Analysis

All RGI tenants/members must report all changes of income, no matter how small. Under the social housing program, it is a requirement that rent be reviewed on at least an annual basis for each RGI household. Income reviews may be conducted more frequently than once a year. Service Managers have been given the discretion to determine if an increase of less than \$10 should be taken following any periodic income review.

Rent geared to income is calculated based on 30% of total gross monthly household income. A change in the household's gross monthly income of \$35 or less would result in a rent increase of less than \$10.00. For example, a senior citizen whose only change in income is the quarterly increases in their Guaranteed Income Supplement would be required to declare the change, provide supporting documentation for all sources of income and then have their rent recalculated. This would occur every three months with resulting in rent increases of less than \$2.00 per occurrence. This requirement is onerous for both the household and housing provider staff.

## Recommendation

- 1. Households are required to report within 30 days of the change taking place all changes in household income greater than \$35 in any month.**
- 2. Increases in rent of \$10.00 or less must be implemented when an annual review is completed.**
- 3. Increases in rent of \$10.00 or less will not be implemented for rent increases outside of the annual review process.**

### **7. Policy: Ranking Existing Market Rent Households applying for RGI Assistance - Economic Hardship**

**Legislative Reference:** O. Reg. 339/01 Part VI, s. 12(2), 14 (1)  
O. Reg. 298/01 35(1), 41(1)

All households seeking RGI assistance must be screened for eligibility by the central housing registry. Housing Providers frequently receive requests from existing market rent households (in situ) for rent subsidy due to a change or loss of income and or a loss of spouse or co-applicant.

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## Analysis

Under the previous social housing program, market rent households who experienced a significant change in their income could seek RGI assistance from their housing provider. These in situ applicants would be placed on the housing provider's wait list according to their original date of application for housing. The provider could offer RGI assistance if there was sufficient subsidy available or when a vacancy occurred in a RGI unit.

Under the existing policy, the in situ market rent household's application for RGI housing is awarded the current date and is placed on the wait list on a chronological basis. In the interim, the household would be required to continue to pay the market rent and could experience financial difficulties possibly leading to economic eviction. The housing providers could experience increased bad debts and vacancy loss.

In consultation with the Social Housing Work Group, it was agreed that in situ market rent households who experience a significant economic change that adversely affects their ability to pay full market rent, should be considered for an alternate ranking date for RGI assistance.

The objective of creating a local policy for in situ market rent households is as follows:

1. To ensure fair and balanced consideration of needs for both applicants and in situ market households.
2. To assist in minimizing economic evictions of current tenants/members.
3. To ensure the process of access to RGI units is not abused and to avoid applicant queue jumping.
4. To ensure applicants on the wait list who may have similar or greater needs are not displaced as a result of this policy.

In order to qualify to received an alternate ranking date, in situ market rent households are required to:

- a) meet all social housing reform act eligibility requirement, and
- b) must demonstrate that they have experienced a significant change in circumstances that affects their ability to pay market rent (eg. The household experiences permanent job loss, and or loss of spouse or co applicant.)

Once eligibility for RGI assistance and economic hardship is established, the household will be added to the subsidiary wait list of their current housing provider with their original date of application. This approach would offer long term households an advantage over new chronological applicants on the waitlist. It would not necessarily give the in situ market rent household RGI assistance immediately.

The centralized wait list contains the names of both non resident and in situ households waiting for RGI assistance. It is possible that the in situ market rent household would not be on the top of the chronological wait list.

Market rent households who wish to transfer from one housing provider to another in order to receive RGI assistance are considered new applicants and do not get the benefit of backdating their application.

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## Recommendation

**It is recommended that in situ market rent households who experience economic hardship and request RGI assistance be given their original date of application for ranking purposes.**

### 8. Policy: Local Priority Household Categories

**Legislative Reference:** SHRA s. 77(1), (4) (5) (6) (7)

Under the SHRA, households that have a member or members who are abused and apply for RGI assistance have mandatory priority on the centralized wait list. This policy is intended to protect the safety of the applicant and other household members. Service Managers have been given the flexibility to create additional local priority categories. There is no requirement that additional priority categories be established.

### Analysis

A special priority household has the highest ranking, above all other applicants on the centralized waiting list. Special priority households are subject to the same eligibility rules as other applicants for RGI assistance. Once special priority status has been assigned to a household, it can not be arbitrarily removed while the household remains on the centralized wait list.

Under the previous social housing program, housing providers were permitted to give priority in placement to households who were in urgent need of accommodation. Households who were eligible for this optional priority placement were: those whose permanent residence had been destroyed and who had no place to live; those whose children would only be returned to their custody by Children's Aid when adequate housing was obtained; or those who were being released from hospital or another care facility and could not return to their former residence and had no place to live. Some housing providers also elected to give priority in placement to those households with serious medical/health issues.

In examining the need to establish additional "local access priorities" beyond the mandatory special priority category, the Work Group reviewed the results of the stakeholder consultations and recommended that only one additional local priority access category be adopted: Urgent. If this recommendation is approved, households assigned Urgent status would rank immediately below Special Priority applicants and ahead of all other chronological applications.

The Work Group recommended that in order to qualify for Urgent Status, a household would be required to meet one or more of the following criteria:

- Persons who are living on the street (no shelter - absolute homelessness); or
- Persons living in substandard housing which has been condemned by the municipality, for example: Property Standards violations which require that the unit be vacated in order to complete the work, confirmed by an Order of Court or the Ontario Rental Housing Tribunal
- Persons using the emergency shelter system as their primary residence; or
- Persons whose homes have been destroyed by fire or natural disaster; or
- Persons awaiting release from hospital who cannot return to their former place of residence and will not be released until suitable housing is found; or

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- Families whose children are at risk of apprehension or will not be returned by child protection agencies due to the household not having adequate housing AND lack of adequate housing is the only protection issue outstanding.

### **Recommendation**

**It is recommended that the Service Manager adopt the additional Urgent priority category.**

### **9. Policy: Reimbursement of the Service Manager**

**Legislative Reference:** SHRA s. 86 (1) O. Reg. 298/01 s54(1)

Under the current legislation, a household who has underpaid their rent due to a calculation error by the housing provider would receive more subsidy than they are entitled to. Once the error is discovered, the household may be asked to reimburse the over paid subsidy to the Service Manager. If reimbursement is sought by the Service Manager, the monthly surcharge (repayment) can be no more than 10% of the correct rent.

The Service Manager has the option to pursue reimbursement from the household or may decide not to pursue reimbursement. Instructions for housing providers on this issue are contained within the Service Agreement.

### **Analysis**

The City of Greater Sudbury has delegated the task of RGI calculations to local housing providers. This was done through a Service Agreement. Section 86 of the SHRA addresses situations where a housing provider has determined that a household has been paying a lower geared to income rent than what they should be paying. The reasons for this may include the following:

- the housing provider was not given full or accurate information regarding the households income;
- the housing provider made an error in determining the geared to income rent payable by the household.

In the instance when the housing provider is not given full or accurate information regarding a household's income, it is suggested that the housing provider negotiate a repayment schedule with the tenant which will allow for the quickest feasible reimbursement of the total underpayment. If an agreement cannot be negotiated, it is recommended that the underpayment be collected by increasing the household geared to income rent by the legislated maximum of 10% each month.

The Work Group felt that if all or part of the arrears are as a result of the housing provider incorrectly calculating the rent geared to income subsidy, the Service Manager should waive the requirement for the household to repay the over subsidy. This approach would be consistent with the business practices established under the previous social housing program. This approach also does not penalize the household who met their responsibilities under the legislation for an administrative error on the part of the housing provider.

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If the error was material, the Service Manager has the option of exercising its rights under the Service Agreement. Responsibility for administration of the RGI function could be recalled from the housing provider and taken over by the Service Manager or its delegate. The Service Manager can also elect to reduce the provider's subsidy at an amount equal to the error.

To minimize provider error, Housing Services provides regular RGI calculation workshops for local providers. Housing Services also performs periodic reviews of provider RGI calculations.

### **Recommendation**

**It is recommended the Service Manager waive the requirement for reimbursement of over paid RGI subsidy in situations where there has been an administrative error by the housing provider.**

### **10. Policy: Eligibility - Divestment of Residential Property**

**Legislative Reference:** O. Reg. 298/01 s.9

The legislation specifies that if any member of a household receiving RGI assistance has an interest in residential property suitable for year round occupancy, the interest must be divested within 180 days of receiving RGI assistance. The Service Manager may extend the time frame if satisfied that there are reasonable grounds to do so. Failure to divest the interest could result in the household being found ineligible to receive RGI assistance.

### **Analysis**

There has always been a requirement under the social housing program for tenants to divest interest in residential property. The Social Housing Work Group reported that relatively few households participating in the social housing program are in possession of residential property at the time of housing.

The local real estate market has an impact of the ability to dispose of residential property within the time frame. The Work Group felt that the 180 day time frame was adequate but in exceptional circumstances, an extension could be considered. The household would be required to demonstrate the efforts made to dispose of the interest in the property in order to receive any extension. The onus would be on the household to declare and provide updated information. Any extension of the requirement to divest the interest in the residential property would be reviewed on a semi-annual basis and again as part of the annual renewal process to ensure a consistent approach.

### **Recommendation**

**It is recommended that the legislated time frame of 180 days for the divestment of interest in a residential property be adopted for the City of Greater Sudbury service area. In extenuating circumstances, the Service Manager will consider requests to extend the time frame for the disposition of the interest in the property. Any extensions granted will be monitored on a semi-annual basis.**

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### **11. Policy: Notice of Change Rule**

**Legislative Reference:** SHRA 2000, O. Reg. 85/02 amending O. Reg. 298/01 s.5 (5), s6(3), Clause 10(1) (a), Clause 20(a)

“ the household shall provide such updated document and information as the Service Manager may require within 10 business days from the date that the content of the document or the information ceases to be accurate, or within such longer period as the decision maker may allow.”

#### **Analysis**

RGI applicants and tenants must report changes in income, or any changes in the household composition within 10 business days of the change having taken place. Failure to do so could result in the household being found ineligible for RGI assistance.

The intent of the regulation is to ensure that changes are reported in a timely manner. This will permit rent adjustments to be made to accurately reflect the households financial circumstances and continued eligibility.

In consultation with the Social Housing Work Group, it was felt that the current requirement to report changes within 10 business days was too onerous for both applicants and tenants. There was a concern that households who fail to report changes within the legislated 10 business days will lose their RGI subsidy. Once this occurred, the household would be given a 90 day notice of rent increase and be forced to reapply for subsidy. They would be placed at the bottom of the centralized waiting list. It is possible the household could fall into arrears and face eviction before re-qualifying for RGI assistance. An increase in evictions would have serious financial implications for both local housing providers and RGI households.

In determining a reasonable period of time to report changes, the Work Group felt the monthly rent cycle appeared to be a natural fit. The Work Group recommended that tenants be required to report changes to their income and household composition and supply verification of the change within 30 calendar days. The Work Group also recommended that for consistency, the same time frame be adopted for applicants to report changes in their circumstances.

Where the change was not reported within 30 days of its occurrence, the household will be made ineligible for RGI assistance. If documentation is received within the specified time period (30 days), the household continues to be eligible for RGI assistance and the rent is adjusted as necessary.

#### **Recommendation**

**RGI households and applicants must report all changes and supply supporting documentation to the Service Manager or the housing provider within 30 calendar days of any change in information or documentation taking effect.**

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## **12. Policy: Earliest Application Date for Social Housing**

**Legislative Reference:** SHRA 2000, O. Reg. 298/01 41(5)

Under the legislation, households are ranked on the centralized wait list according to their date of application for geared to income housing.

The Service Manager has the discretion to establish a local policy to the effect that if an applicant adds a housing provider to its list of project preferences after the household has been placed on the centralized wait list, the application date for the newly added provider is the date it was selected.

### **Analysis**

The SHRA allows Service Managers the option of using an applicant's earliest date of application for social housing or multiple dates in circumstances when an applicant has applied to several housing providers.

In consultation with the Social Housing Work Group it was felt the use of the earliest application date recognizes the time that an applicant identified their need for housing. It also ensures access to an increased number of housing providers because the earliest date will be recognized for each housing provider in CGS's social housing portfolio. Use of the original date of application would be consistent with the practice followed by local housing providers under the previous housing program.

### **Recommendation**

**It is recommended that the Provincial Standard of using original date of application for RGI assistance as the ranking date for all housing selections, regardless of when the household added the project to its list of preferences.**