Implementation of Ombudsman’s recommendations
Task force status update
November 18, 2013

Notes on implementation:

- Recommendations 1, 2 and 3d are being implemented together. The main goal is to make the annual rent review process simpler and easier for residents and to develop ways to monitor and ensure compliance by staff.
- Recommendations 5 and 19 are being implemented together. The staff training developed to meet the requirements of recommendation 19 will be informed by the action plan for vulnerable seniors developed for recommendation 5.
- Recommendations 6 and 7 are being implemented together as part of an action plan for supporting residents turning 65 that includes outreach and new business processes for flagging when residents will turn 65 in six months.
- Recommendations 8, 10, 12, 13 and 14 are being implemented jointly. The main goal is to develop a new arrears collection process that is clear and straightforward to residents and staff, mandates personal contact before an N4 (Notice to Terminate) is served, and is backed by effective compliance monitoring. This will be supported by a set of standards for arrears repayment plans that guides staff in negotiating repayment agreements that are fair, reasonable and achievable by residents.
- Recommendations 15, 16, and 17 are being implemented together. Documentation guidelines will be a critical success factor for staff in implementing the improved annual rent review and arrears collection processes. Clear guidelines will support them in documenting resident information concisely, completely, and without personal judgment.
- Recommendations 11, 23, 24 and 25 are being implemented together. The main goal is to establish a compliance and performance management framework with clear roles and accountabilities for TSCs, operating unit managers and senior management. Operating unit managers will play a key role in monitoring compliance and addressing performance issues with individual staff. Senior management is ultimately accountable for staff compliance. The process audit team in Program Services will produce compliance audits for both groups to use in decision-making.

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| 1 | TCH evaluate its current annual rent review practice, specifically: | **Approach:** We are evaluating our current rent review practice and assessing the feasibility of implementing a biannual review for seniors’ households on fixed incomes. As part of the review of our current practice, we are identifying ways to improve the rent review process for all residents, including simplifying reporting requirements, in partnership with the City of Toronto’s Shelter, Support and Housing Administration Division. **Deliverables:**  
- Data analysis report  
- Implementation report | Mary Roknic, Director, Program Services | Many other providers and service managers across the province have chosen not to implement this approach. An idea is to run a pilot program to assess these potential impacts. Based on that suggestion we are proposing one of two options:  
1. Working with Ottawa Community Housing to evaluate their bi-annual rent review process  
2. Conducting our own pilot program in one operating unit  
The evaluation of Ottawa’s approach could be completed in under one year. Doing our own pilot would take about 3 years. |

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<td>That the practice of returning the annual review package to a tenant when there is missing information cease immediately. The tenant should instead be advised what information is missing and asked to furnish it.</td>
<td><strong>Approach:</strong> We are evaluating our current rent review process, both the documented process and how it is applied in the field by staff. We are identifying all of the ways that we can make the process simpler and easier for residents and staff, including reducing reporting requirements, and developing a revised process that reflects these improvements. We are evaluating whether centralized document management would help us avoid the loss or misplacement of documents during the annual review process. We are developing a process to ensure that residents receive receipts for all of the documents they submit during the annual rent review process. <strong>Deliverables:</strong> - New annual rent review process - Report on recommendations regarding centralized document management - Accompanying training and communications plans</td>
<td>Suman Pushparajah, Manager, Business Efficiencies</td>
<td>We have drafted a new business process for annual rent reviews that incorporates a document receipt process and early points of personal contact. - A revised version, accompanied by a briefing note, was submitted to the Ombudsman’s office on <strong>November 8</strong>. This is a key business process with a big impact on front-line staff and residents. Training on the new process will be delivered to TSC’s as part of the TSC Education and Training Development project (see Recommendation 17, below, for more details).</td>
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| 3 | That the outstanding Justice LeSage recommendations discussed in this report, and agreed to by TCHC, be implemented without further delay and no later than October 1, 2013 including but not limited to: c) Addressing the excessive volume of correspondence to tenants by reviewing all legal requirements and looking at viable alternatives that are user friendly, appropriate and non-threatening in their content. i. That in this regard, the information be accurate and written in Easy English in a manner that is accessible, easily understood, inviting and equitable in its approach ii. That legally required correspondence be written in language that is matter of fact and non-threatening in tone iii. That correspondence be preceded and followed up with personal contact wherever possible iv. That Justice LeSage's recommendation of more direct contact be construed minimally as telephone contact but preferably as personal visits and that correspondence to the tenant not be understood to mean personal contact d) Providing tenants with a receipt for the documents they submit in the annual review process. e) Posting in each tenant building an up-to-date list of community agencies that are within close proximity of the building. The list should be regularly updated, no less than every six months. | **Approach:** This recommendation includes several key parts that tie into the implementation of other recommendations:  
- 3 c), parts i and ii are being implemented through a full review of all arrears collection and rent review correspondence for plain language, clarity and tone.  
- 3 c) parts iii and iv are being implemented as part of the revised arrears collection process (recommendation 12).  
- 3 d) is being implemented as part of the work for recommendations 1 and 2.  
- 3 e) is being implemented as a separate initiative by Resident and Community Services and Strategic Communications.  

As part of this work, we are revalidating the implementation of all of the LeSage recommendations, including the ones mentioned in the *Housing at Risk* report.  

**Deliverables:**  
- Documentation and report on implementation of LeSage recommendations (See Recommendation 26 for additional detail on Commissioner of Housing Equity)  
- Revised letter templates and associated business processes  
- Document receipt process for annual reviews  
- Community agency information posters in every Toronto Community Housing building | Hugh Lawson, Director, Strategic Planning & Stakeholder Relations | Letters: The revised letters, reviewed by the Ombudsman, have been integrated into our IT system as of October 7, 2013. These letters are now automatically used.  

Community agency postings: Posters are, as of October 1, up in all buildings across our portfolio.  

Personal contact: The new draft arrears collection process has been submitted to the Ombudsman’s office for review on September 30.  

Document receipts: The proposed document receipt process has been submitted to the Ombudsman’s office for review on September 30. |
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| 4  | That template letters and related correspondence used by private property companies be brought in line with those used by TCHC to ensure consistency and similar treatment of its tenants. | We are approaching this recommendation as part of a larger action plan to address service delivery inconsistencies among contract managed companies.  
First we are examining the current state of affairs – contract management companies are required to use our letters under the terms of their contracts, so we need to learn where they deviating from the requirements and why.  
Next we need to implement the revised correspondence being developed for recommendations 2 and 3 within contract managed companies. To ensure that contract managed staff members understand the importance of using standardized correspondence and have the skills they need to use them, we will directly deliver training to their staff. Then we will determine any remaining compliance issues through an audit.  
**Deliverables:**  
- Review of all the form letters in use by each contract company  
- Compiled set of letters/ templates approved by Program Services for use by contract staff  
- Training workshop for Contract Company staff to ensure the approved letters are standardized across contract portfolios  
- A random audit of Contract Company’s files for consistency/compliance | George Ewer, Manager, Contract Compliance and Delivery | We will be moving the companies to our IT system, HMS, hopefully in 2014. This will enable compliance with the recommendation,  
This is a larger project that will extend into 2014. As an interim solution, they will be using letters modified after the Ombudsman’s review. We will advise the Ombudsman of this solution at our **November 27** progress meeting. |
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<td>That TCHC explicitly incorporate into its Seniors Framework an action plan for dealing with vulnerable seniors including but not limited to: &lt;br&gt; a) Express recognition and promotion of equitable service to the increased vulnerability that exists when factors such as immigration, language, disability, diminished capacity, mental health, and sexual orientation intersect with the challenges of aging. &lt;br&gt; b) That consultation take place as appropriate with staff responsible for working with vulnerable tenants, including those who may have mental health challenges &lt;br&gt; c) That the role of the Community Services Coordinators and other staff responsible for mental health concerns be clearly articulated and used strategically and collaboratively. &lt;br&gt; d) That staff with responsibility for addressing mental health concerns be included in team conferencing when concerns of mental health or cognitive impairment are at issue. &lt;br&gt; e) That guidelines be developed and shared with staff surrounding the role and value of the Community Services Coordinators and other staff responsible for mental health.</td>
<td>We are developing an action plan for supporting vulnerable seniors that is informed by the 2008-2010 Seniors Framework, but is distinct in that it is forward-looking and action-oriented. Express recognition and promotion of equitable service and consultation with staff responsible for working with vulnerable tenants will inform the action plan. &lt;br&gt; Staff from the Resident Access and Support Unit in the Resident and Community Services Division are developing a guide for front-line staff that explains how and when to engage Community Services Coordinators to support a resident in need. &lt;br&gt; The arrears collection process developed for recommendation 12 addresses 5d) by mandating integrated team meetings with the TSC, CSC, Superintendent and Operating Unit Manager present to discuss ways to support the resident who is in arrears before they get to the L1 (application to evict) stage in the process. &lt;br&gt; <strong>Deliverables:</strong>&lt;br&gt; - Action plan for supporting vulnerable seniors&lt;br&gt; - Guidelines for staff on how and when to engage Community Services Coordinators</td>
<td>Kola Iloyumade, Mental Health and Special Projects, CEO’s Office</td>
<td>The action plan is currently being revised by the lead and will be presented to the task force at the <strong>November 20</strong> meeting. &lt;br&gt; The arrears collection process (which mandates integrated team meetings) has been submitted to the Ombudsman’s office for review and comment on <strong>October 2</strong>. We have not yet received feedback on it. &lt;br&gt; To address part <strong>d)</strong> of the recommendation, we are developing guidelines for running integrated team meetings. These guidelines will clarify the roles of staff responsible for addressing mental health concerns and ensure that they are included in situations where mental health and cognitive impairment are at issue. These guidelines will be presented at the <strong>December 4</strong> task force meeting.</td>
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| 6  | That TCHC address the issue of tenants’ income changing when they become 65 through a public education program or some other mechanism, so that affected tenants are aware of the impact this may have on their RGI rent. | We are developing a business process for flagging residents who are going to turn 65 in six months and notifying them of what they need to know about their income changes and applications for government assistance. This process will be supported by communications to staff and a public outreach campaign to senior residents with posters, tip sheets, and information in the resident handbook. **Deliverables:**  
  - Business processes and accompanying templates (letters, telephone scripts) for informing residents  
  - Accompanying communications and outreach plans | Mary Roknic, Director, Program Services                                                                                                                               | The draft business processes, communications materials and education plan for notifying residents before they turn 65 was submitted to the Ombudsman’s office on **November 8.** | ![ ]  |
<p>| 7  | That staff visit the tenants and provide them with a copy of the Old Age Security application and information about community agencies that could assist them in completing the form if required. | We believe that the notification process and outreach campaign that we have developed for recommendation 6 meets the intent of this recommendation without requiring staff to conduct personal visits. Given the number of residents turning 65 in upcoming years (see attached Excel sheet for recommendation 6), we believe that a systematic notification process with personal follow-up by TSCs is an appropriate course of action that takes into account our staffing resources but still gets the right information to residents when they need it so that they can avoid arrears associated with the income change at age 65. | Mary Roknic, Director, Program Services | See progress update for recommendation 6, above. | ![ ]  |</p>
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<td>That TCHC determine whether, in the case of retroactive arrears, it will enforce the practice of collecting a maximum of 10% of the tenant's RGI, each month, and that this be clearly spelled out in the Eviction Prevention Policy.</td>
<td>We are using this recommendation as a criterion in developing the draft repayment plan guidelines. Note that the Eviction Prevention Policy will not need to be revised to meet the requirements of this recommendation – changes will be captured in the Eviction Prevention Policy Guidelines, which guide staff in implementing the policy. <strong>Deliverables:</strong> ● Repayment plan guideline and revised Eviction Prevention Policy Guidelines.</td>
<td>Mary Roknic</td>
<td>Staff are reviewing the impacts of this recommendation. Guidelines for determining the appropriate amount of repayment for a household are being developed as a guide for staff and residents. Sector best practice (reported from Ottawa Community Housing and ONPHA) is not to set a limit because of the concerns above, but instead to negotiate based on each tenant's individual circumstances.</td>
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| 9 | That amounts of arrears be properly calculated with plain language explanations of the figures and communicated to the tenant. | We resolved the system-driven calculation issues that were resulting in confusing, contradictory arrears figures through system changes to HMS in November 2012. Residents with more than three months of arrears receive an attachment with their N4 (Notice to Terminate) that is printed from the HMS system. It is in small print and is difficult to understand. We are developing a cover sheet that explains the printout in plain language. For the future, we are tracking the challenges with presenting arrears calculations clearly to residents and will use this information to inform the business requirements for our new tenancy management system, which is intended to replace HMS in the next year and a half. **Deliverables:**  
  - Cover sheet for attachment with N4 notice  
  - Business requirements for new housing management system | Mary Roknic, Director, Program Services | The cover sheet is being reviewed and refined by the Strategic Communications team. The task force has reviewed it and still found it too complicated to read for residents. The document will be available in different languages. It will be reviewed by the task force again on **November 20** and then shared with the Ombudsman on **November 27**. | ✔️ |
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| 10 | That when tenant arrears first occur, early interventions are made by staff with personal visits wherever possible. | The draft arrears collection process requires personal contact before an N4 (Notice to Terminate) is served. Personal contact is defined as a successful phone call (not leaving a voicemail message), or a face-to-face conversation via door knocking, an arranged meeting, or the resident visiting the operating unit office. **Deliverables:**  
  - Business process outlining Asset Management and Resident and Community Services responsibilities  
  - Accompanying standards for personal contact | Harmony Brown, Business Coordinator, Resident and Community Services  
Patricia Narine | Part one of the arrears collection process has been submitted to the Ombudsman's office for review on **October 2**.  
Staff are working with ITS to prioritize system changes that will help us better document staff interventions so that we can be sure that personal contact has been made.  
**We met with the Ombudsman’s office on October 25 to review this process in detail.** | [ ] |
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| 11 | That staff ensure TCHC policies are in fact implemented in practice. | This requirement supports recommendations 23, 24, and 25.  
- For recommendation 23, we are using new performance management standards and training to ensure that staff understand policies and are accountable for following them.  
- For recommendation 24, we are using auditing and reporting to ensure that senior management are aware of any systematic compliance issues and can take action accordingly.  
- For recommendation 25, we are using training and performance management to ensure that middle management (operating unit managers) understand their role in monitoring the performance and compliance of their staff with policies and are accountable for taking action as needed.  
In addition, we will be holding monthly meetings at the business unit level to discuss policies and procedures and capture feedback, issues and questions from staff. The Strategic Planning and Stakeholder Relations unit will coordinate these meetings and work with Organizational Development and other business units to develop policy-focused content for the meetings.  
**Deliverables:**  
- See deliverables for Recommendations 23-25, below. | Hugh Lawson, Director, Strategic Planning and Stakeholder Relations  
Graham Leah | This recommendation is being implemented via several initiatives, including job-specific training, company-wide policy training, business process development and the creation of a compliance and audit plan for all deliverables resulting from the implementation of the Ombudsman’s recommendation.  
Company-wide policy training will begin in January 2014.  
See the progress updates for recommendation 23, below, for more detail. |
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| 12 | That TCHC develop an arrears collection process that includes repayment plan guidelines and provide a draft to the Ombudsman's office for review and comment by October 1, 2013. | **Deliverables:**  
- Arrears collection process  
- Repayment plan guidelines and standards  
- Process map, training and communications plan for arrears collection process | Mary Roknic, Director, Program Services | The draft arrears collection process and repayment plan guidelines have been submitted to the Ombudsman's office for review and comment on October 25. |
| 13 | That eviction be a last resort and not a first resort.                        | We are using this recommendation as a requirement in the development of the arrears collection process. All necessary steps, including personal contact, will be required by the process before eviction can be pursued, and compliance by staff will be audited and enforced. | Mary Roknic, Director, Program Services | See Progress update for recommendation 12, above.                                                                                                    |
| 14 | That the eviction processes for arrears are not used improperly for another purpose. | The draft arrears collection process is being developed and reviewed according to this criterion so that both the structure of the process and the built-in compliance monitoring ensure that the process cannot be misused to evict a tenant for other reasons.  
**Deliverables:**  
- Arrears collection process  
- Process map, training and communications plan for arrears collection process | Harmony Brown | See Progress update for Recommendation 12, above.                                                                                                    |
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| 15 | That a guideline be developed to instruct staff and set standards for the type of information to be included in tenant files. | The implementation of this recommendation is complex and is tied into the development of revised business processes for arrears collection and annual rent review that must be supported by improved documentation standards. Developing documentation standards for these two processes will be the priority, followed by the mapping of documentation requirements for other business processes that impact the tenant file. **Deliverables:**  
  - Guideline for all staff on documentation standards and requirements for resident files | Mary Roknic, Director, Program Services                                                                                                                                                    | We are developing documentation standards to accompany the draft arrears collection process (recommendation 12).  
  We will review these standards at the task force on November 27 and with the staff reference panel and Resident Services and Asset Management will use the input to develop the documentation standards for all other TSC processes. | ✔️ |
<p>| 16 | That all information in tenant files be entered objectively and without personal comment. | We are implementing this recommendation as one of the criteria for a set of standards guiding staff in the type of information to include in tenant files (recommendation 15).                                                                 | Mary Roknic, Director, Program Services | See Progress update for recommendation 15, above.                                                                                                                                                                                                                     | ✔️ |</p>
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| 17 | That training be required in standards and content for documentation and record-keeping by May 30, 2014. | We will be developing training for all staff involved in documentation of tenant files based on the guidelines developed for recommendations 15 and 16. **Deliverables:**  
  - Training module on standards and content for documentation and record-keeping | Rahim Moledina | This training will be incorporated into the TSC Education and Training Development project for all of the core subject areas of the TCS role:  
  - Offer & Leasing Process  
  - Tenancy Management  
  - Applications  
  - Move-In  
  - Transfers  
  - Move-Out  
  Documentation standards will be covered throughout all modules. **79% of the training modules have been completed and the project is on track for completion by end of 2013. Implementation will begin in Q1 2014.** |            |
| 18 | That emergency contacts for tenants be kept on file and up to date, wherever possible and to the best of TCHC's ability. | We are developing a business process that prompts senior residents to update their emergency contact when they call in with a maintenance or service request. We are also improving the form we use to gather emergency contacts so that it is clear to residents how important it is to fill it out. **Deliverables:**  
  - Business process for updating emergency contact info  
  - Accompanying implementation plan | Kevin Brooks | Asset Management has developed a business process to prompt residents to update their emergency contacts when a resident’s emergency contact is missing or has not been updated in over a year. **The process will be reviewed by the task force on November 20 and submitted to the Ombudsman on November 27.** |        |
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| 19 | That training with respect to vulnerable seniors be implemented by:  
  a) Developing a guideline to identify indicators of distress, diminished capacity or cognitive impairment to assist staff in assessing the need for intervention with vulnerable seniors.  
  b) Training staff by June 30, 2014 to recognize signs of distress and engage in appropriate responses and interventions.  
  c) That a training program be put in place to ensure employees are skilled and able to meet the needs of vulnerable seniors, and that such training be completed by June 30, 2014 for all staff serving vulnerable seniors.  
  d) Requiring TCHC employees to participate in the City of Toronto's e-learning tutorial on "A Guide to Good Practice: Providing Equitable Service to Individuals of all Abilities". | The teams responsible for implementing recommendations 5 and 19 are working together to ensure that the training we develop supports the action plan for vulnerable seniors (recommendation 5).  
  The work to implement this recommendation aligns with one of the initiatives in Homeward 2016, Toronto Community Housing’s 2013-2015 Strategic Plan, to “improve the organization’s internal capacity to identify residents who are at risk and coordinate third-party supports.”  
  **Deliverables:**  
  - Training modules to support this recommendation  
  Plan for Toronto Community Housing staff to access the City of Toronto e-learning tutorial | Patricia Narine  
  Andalee Adamali | Work on the deliverables for this recommendation is in early stages. The team is focused initially on the development of the seniors’ action plan for recommendation 5. |
| 20 | That a protocol be explored with the Ontario Public Guardian and Trustee in cases where its intervention may be useful and required. | We will work to implement partnership with OPG that outlines a process for working together in cases where its intervention is needed, with clear accountabilities for both organizations.  
  **Deliverables:**  
  - Protocol or agreement with the Ontario Public Guardian and Trustee | Gene Jones  
  Kathleen Llewellyn-Thomas | Background documentation on past work with the OPG is being developed. The Ombudsman has offered to assist TCH with making connections with this office. |
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<td>That TCH pursue initiatives, similar to the LOFT Pathways pilot project, to advocate for funding to provide additional supports to tenants.</td>
<td>The Resident and Community Services division is implementing this recommendation as part of their business plan and responsibilities in <em>Homeward 2016</em>, Toronto Community Housing’s 2013-2015 Strategic Plan. In the strategic plan, they are committed to “working with agencies, funders and the City to bridge service gaps, focusing primarily on buildings with a high percentage of residents who need support.”</td>
<td>Patricia Narine, Mary Boushel, Lindsay Viets</td>
<td>We have produced a report on existing and planned work to obtain funding to provide additional supports to tenants that we believe provides evidence supporting our implementation of this recommendation. The report was submitted to the Ombudsman's office on November 8.</td>
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<td>That a consulting relationship be established with the Centre for Addiction and Mental Health, or a comparable organization, to enable the sharing of best practices and professional advice for staff of TCHC.</td>
<td>We are approaching several key organizations with expertise in mental health, including CAMH, the Wellesley Institute, and York and Ryerson Universities, to examine options for providing best practices and professional advice to Toronto Community Housing staff.</td>
<td>Kola Iloyumade</td>
<td>We are working to assess the options available from different organizations in terms of providing consulting advice, while also assessing the needs of staff that will be met through the consulting relationship. A plan will be brought forward for discussion at the November 20 task force meeting.</td>
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| 23 | That staff responsible for implementing and managing the Eviction Prevention Policy, the Arrears Collection Process and the Eviction Prevention Checklist be held accountable for their actions. | Measures for monitoring compliance are built into every step of the draft arrears collection process so that issues can be flagged and dealt with rapidly by managers.  
In addition to process monitoring, we are adding staff resources to the process audit team in Program Services so that the new arrears collection process can be audited for staff compliance. Findings from the audits will be shared with managers responsible for the performance of Tenant Services Coordinators (TSCs), and with senior managers who are accountable for the process being followed (recommendation 24).  
We are developing a performance management program for TSCs that is based on compliance with all of the steps in key processes like arrears collection. Managers will use audit findings and the results of regular compliance monitoring to assess staff training needs and determine consequences for staff with recurring compliance issues.  
In the interim, we are revising all training for Tenant Service Coordinators by December 31, 2013 to ensure full understanding of processes and to emphasize compliance and accountability. | Graham Leah | We are assessing the human resources requirements for an enhanced process audit team in Program Services.  
Work on the performance management program for TSCs is ongoing and will continue into 2014.  
The revised TSC training plan is on track – see progress update for recommendation 17, above, for details. | |
**Recommendation**

That senior management ensures documented expectations articulated through policies, procedures and guidelines are implemented in practice and routinely followed.

**Approach & deliverables**

Senior management is accountable for staff compliance with all business processes including arrears collection and annual review. Results of regular performance monitoring and compliance audits will be shared with the executive on a quarterly basis and used to inform decisions on performance management processes, policy changes, and repercussions for staff with recurrent compliance issues.

**Deliverables:**

- Quarterly reporting to the executive team on compliance with Eviction Prevention Policy and accompanying arrears collection process

**Lead**

Hugh Lawson

**Progress update**

See progress update for Recommendation 23, above.

**Completion**

*items are marked complete once they have been submitted to the Ombudsman’s office for review.*
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| 25 | That meaningful consequence for failure to comply by staff is enforced through responsible management.                                                                                                         | We are approaching this recommendation as focusing on operations (middle) management, complementing the focus of recommendation 24 on senior management.  
As part of the new performance management program for TSCs, managers will be trained on their role in enforcing compliance and addressing performance issues effectively. Managers will be held accountable for their responsibilities through their performance management plans (PMPs).  
Findings from the compliance audits and process monitoring outlined in Recommendation 23, above, will be shared with managers responsible for the performance of Tenant Services Coordinators (TSCs) and used to assess staff training needs and determine consequences for staff with recurring compliance issues.  
**Deliverables:**  
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| 26 | That any review conducted by staff that may precipitate penalties for the tenant up to and including eviction must be done thoroughly and objectively, without bias. | We are establishing mechanisms to ensure that reviews are done thoroughly and objectively, without bias.  
- We are developing standard operating procedures and supporting correspondence for communicating the option for a review to residents in a clear, consistent way  
- A group of senior staff, not involved in evictions decisions, is meeting weekly to review all proposed evictions to ensure all policies have been followed.  
- We are establishing an external panel to conduct reviews of decisions relating to rent geared-to-income assistance in compliance with the requirements of the Housing Services Act.  
- We are establishing a Commissioner of Housing Equity to provide a final independent, unbiased review of all eviction decisions  

In the interim, an internal group that is separate from the operations staff involved in the initial decisions is reviewing all RGI loss of subsidy decisions.  

**Deliverables:**  
- External RGI review panel  
- Creating and staffing the office of Commissioner for Housing Equity | Maurice Brenner  
Hugh Lawson  
Graham Leah | The competition for the Commissioner of Housing Equity position has closed.  
We have formed a working group to develop the external review panel and identify potential members from sector organizations and to work with the City to train the panel members in the requirements of the Housing Services Act. |
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| 27 | That systems access to federal Notices of Assessment from the Canadian Revenue Agency be explored. | We are engaging with the Canada Revenue Agency (CRA) through our service manager, the City of Toronto. The aim is to pursue an agreement to permit easier access to Notices of Assessment for residents who grant us permission to access them.  
**Deliverables:**  
- Meetings with CRA on Notices of Assessment  
- Access to Notices of Assessment in cases where resident permission is provided | Hugh Lawson | On **November 12** we met with staff from the City’s Social Housing Unit, the provincial Ministry of Finance and the Canada Revenue Agency to discuss how we can have residents’ income tax information provided to us from CRA. It appears possible.  
Staff will draft a proposed way of doing this with City staff for review by CRA. | ![Circle]     |
| 28 | That unless otherwise specified, all recommendations be implemented no later than December 31, 2013 | Two project managers (from Business Efficiencies and Strategic Planning & Stakeholder Relations) will coordinate the work of the task force and ensure that individual leads meet the deadlines they have been assigned.  
**Deliverables:**  
- Final report on the implementation of the recommendations due by December 31, 2013 | Hugh Lawson | The task force continues to meet weekly, and all work is being tracked through progress reporting and sub-committee meetings. Issues and barriers are being flagged with the project managers and executive leads as they arise. | ![Circle]     |
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<td>29</td>
<td>That all written undertakings flowing from these recommendations be provided to my office in draft prior to TCHC staff dissemination.</td>
<td>We are advising the ombudsman’s office of upcoming deliverables for review at the monthly progress update meetings (recommendation 30). We are submitting draft deliverables to the Ombudsman’s office for review as soon as they are ready.</td>
<td>Hugh Lawson</td>
<td>Deliverables for 8 out of 30 recommendations have been submitted to the Ombudsman’s office. Deliverables for 11 other recommendations are on track to be submitted according to the attached critical path. The remaining 11 deliverables are ones where either: 1. The bulk of the work will take place in 2014 – these will be reported on in the 2013 implementation report and included in the 2014 project plan 2. A leadership decision must be made re: implementation: Recommendations 1 and 8 fall into this category 3. They are recommendations related to project management: Recommendations 28, 29 and 30 fall into this category</td>
<td>✔</td>
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<tr>
<td>30</td>
<td>That quarterly updates be provided to my office by way of a face-to face meeting on the status of implementation.</td>
<td>The executive leads and project managers are meeting monthly with the Ombudsman’s office.</td>
<td>Hugh Lawson</td>
<td>The next meeting will be on November 27.</td>
<td>✔</td>
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