



TCHC Response to OCHE Bi-Annual Update

Item 10A

June 28, 2022

Board of Directors

Report: TCHC:2022-35

To: Board of Directors (the "Board")

From: Tenant Services Committee ("TSC")

Date: June 9, 2022

PURPOSE:

The purpose of this report is to provide the Board with an overview of the actions taken at Toronto Community Housing ("TCHC") to maintain tenancy through the management of arrears and through recommendations from the Ontario Commissioner of Housing Equity ("OCHE") Bi-Annual Update from July to December 2021.

RECOMMENDATIONS:

It is recommended that the Board receive this report for its information.

TSC:

This report was received by the TSC on June 9, 2022.

BACKGROUND:

In April 2014, the OCHE was established with the primary mandate of supporting the prevention of evictions through enhanced interactions with seniors and vulnerable tenants who face loss of subsidy or rental arrears. In parallel, TCHC implemented a revised arrears collection process ("ACP") that emphasized early intervention, required increased personal contact with the tenants in arrears, and focused staff efforts on signing repayment

agreements with tenants to manage or resolve their arrears. TCHC staff work with tenants to help them meet the responsibilities of their tenancies and, where feasible, leverage resources and support of OCHE to work towards positive outcomes.

In doing so, OCHE reviews each tenant file identifies process gaps and provides systemic recommendations, where applicable. With over seven years since the development of OCHE, many of the key systemic recommendations have played a vital role in providing tenants support to prevent evictions and maintain tenancies.

In 2019, the restructuring efforts in the operations division led to the creation of regional operations teams and tenant service hubs; this provided the opportunity to revise the ACP based on previous observations and systemic recommendations of OCHE.

RESPONSE TO OCHE RECOMMENDATIONS

1. Administration Delays and Inefficient use of resources

TCHC regional teams are working with their tenancy management staff to identify and achieve administrative efficiencies related to the Arrears Collection Process. For example, Operations is working with the HoMES transition team to better align the ACP steps within the system and identify system automation where possible. Efforts to enhance oversight, training, and reporting are ongoing to achieve long-term increased compliance.

2. Non-Compliance with Policies and Procedures

TCHC issued a new ACP in partnership with OCHE in 2021, which included training to local tenancy management staff. Training was delivered virtually due to implications of the Covid-19 pandemic. Through a review by management it is identified that virtual training had not been optimal in providing training to front line staff and as such with the lifting of COVID restrictions, efforts are under way to deliver refresher training in person in Q2 2022. Enhancing oversight and monitoring through the Arrears Collection Clerks (ARC) will allow continual monitoring and evaluation of the new ACP and identify further capacity building needs through training and oversight. The ARC provides oversight of the referral and return of files to OCHE for all regions which including a inventory of recommendations they have

provided. Quarterly, management will review these recommendations to identify training needs and/or to inform future ACP process reviews.

3. Unreliable Internal Information

OCHE and TCHC have jointly met with the HoMES team to identify gaps and barriers between procedure and system capacity and capabilities. The HoMES team continuously engages with local operation and subject matter experts to facilitate continuous improvements. TCHC is working to align standards and protocols around the management of tenant records through the Hub Playbook and the Integrated Teams. This will include the development of documentation standards and training.

4. Quality of Services

Supporting tenancies is a key deliverable of the Hub Service delivery model. Integrated teams engage tenancies and will work with them to access key resources and wrap-around supports to overcome barriers impacting their tenancies. Specialized resources are also accessible through the Tenancy Resolutions Office which was formed as part of the restructuring of Operations. Enhancing the overall quality of service to include external supports such as SPIDER, FOCUS, Toronto Employment and Social Services (TESS), and other partners. The Tenancy Resolutions Office has worked with OCHE directly to establish an integrated table for joint engagement of complex tenancies who are encountering arrears.

TCHC ACTIVITIES

Training

With the implementation of the new ACP, the multi-disciplinary team and OCHE partnered with Learning and Organizational Development ("L&OD") to thoroughly document the new procedures and support the development and implementation of a training program. The training program was delivered in Q1 2021 before implementing the new ACP in Q2 2021. In person regular refresher training will provide regional teams a better opportunity to refine their understandings of the arrears collection process and strategies for more effectively engaging tenancies experiencing arrears. These sessions will further afford management a opportunity to gain front line feedback of challenges within the process to inform future reviews.

Process Oversight

As the tenant service hubs are established, local integrated Hub teams have become the primary point of contact on all tenancy issues. Furthermore, the Hub teams are supported through a "community of practice" with supervision and support being provided via the regional management teams. It is a key responsibility of the local Regional management team to provide oversight and compliance with the arrears collection process. In order to achieve this, management is required to regularly review the recommendations provided by OCHE. To achieve this the Operations leadership team now meets with OCHE monthly to review the ACP, and systemic recommendations. Collaboratively, Management and OCHE teams will identify strategies that will assist regions and front line staff in overcoming barriers that prevent regular compliance to the ACP.

Maintaining Tenancy

At TCHC, tenants are responsible for paying their rent on the first day of every month. Under the Residential Tenancies Act ("RTA"), tenants may be evicted for several reasons, including, but not limited to, non-payment of rent, engaging in unlawful activity on TCHC property and acting in a way that interferes with the reasonable enjoyment of other tenants. TCHC works with tenants to help them meet the responsibilities of their tenancies and, when possible, keep their housing by complying with the terms of their lease agreement. From time to time, despite the best efforts of staff to engage and resolve the arrears, staff are left with little option but to rely on the assistance of the Landlord Tenant Board ("LTB") to seek a resolution; eviction remains a last resort when seeking a resolution at the LTB with emphasis given to mediating repayment agreements that are thoughtful, compassionate, and achievable to maintain the tenancy. As part of the new ACP, all eviction proceedings related to arrears must receive a thorough review by the OCHE team prior to termination. This work provides an added level of assurance and confidence that all efforts to sustain the tenancy have been taken. Lastly, over the last year, TCHC and OCHE have partnered to implement several programs aimed at targeted reviews and supports: hardened arrears program, quick referral program, and pre-eviction pilot program.

Restarting Tenancy Management

In December 2020, TCHC was instructed via City Council to initiate and evictions moratorium for arrears. In June 2021, this moratorium was extended by the President and CEO until the start of the 3rd stage of the provincial reopening plan. On March 24, 2022 the TCHC board received and approved a report highlighting TCHC's plans for the restart of Regional Operations. This includes the restart of key tenancy management activities including, fully operationalizing HUBS, commencing in person meetings with tenants and the serving of legal notices for non compliance with the terms of the lease agreement.

NEXT STEPS:

TCHC and OCHE will continue to take steps to strengthen their partnership and approach to preventing eviction and maintaining tenancies; continued emphasis needs to be placed on the practical and timely follow-up of arrears, as it is essential in limiting the risk and impact to tenants. Through the regular oversight and process reviews by TCHC, with the input of key partners such as OCHE, will allow for increased opportunity to support and stabilize tenancies at risk through the timely and appropriate provision of support to tenants. At the end of Q2 2022, Management will be coordinating Tenancy Management townhalls for all regional staff engaged in supporting the arrears collection process. OCHE staff will be engaged to seek their participation for these sessions and will be held in person.

SIGNATURE:

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