

Toronto Community Housing



Office of the Commissioner of Housing Equity Bi-Annual Report

Item 9

September 20, 2022

Tenant Services Committee

Report: TSC:2022-43

To: Tenant Services Committee (“TSC”)

From: Commissioner of Housing Equity

Date: August 19, 2022

PURPOSE:

To provide the TSC and the Board of Directors with the Office of the Commissioner of Housing Equity’s (“OCHE”) Bi-Annual Update for the period of January 1, 2022, to June 30, 2022.

RECOMMENDATIONS:

It is recommended that the Tenant Services Committee review and receive this Report for information and forward it to the Board for information.

REASONS FOR RECOMMENDATIONS:

The Bi-Annual Update highlights the OCHE’s case management, audit, and policy work through the period of January 1, 2022, to June 30, 2022 and focuses on the work metrics as outlined in the Board-approved 2022 OCHE Work Plan.

This Report follows the same format as the Bi-Annual Report which covered the period of time between July 1, 2021 and December 31, 2021. In all cases, our numbers for this Report are compared to the numbers from our last Bi-Annual Report from July 1, 2021 to December 31, 2021. Of note,

there have been significant changes to the flow of referrals to the OCHE since January 1, 2022, which will be described within.

Additionally, the Report contains a Review of the new ACP that was implemented in 2021. Of note, TCHC is also undertaking a review of the ACP through LEAN advisors. The OCHE is prepared to support this activity if appropriate. You will find the OCHE review in the Appendix at the end of this Report.

The OCHE received 753 of referrals between January and June 30, 2022. Of those, 90 were sent back¹, and 86 were breach files². Of the breach referrals, 52 files were sent back for no exceptional circumstances and TCHC was advised to proceed to file an L1 Application at the LTB.

The following represents the total number of Stage 1 Referrals the EROs worked on:

1.0 OCHE CASE MANAGEMENT HIGHLIGHTS

Between January 1 and June 30, 2022, 577³ Households were referred to an ERO to address arrears, stabilize the tenancy, and be audited for compliance with the TCHC Eviction Prevention Policy and Arrears Collection Process. These referrals included:

- 103 Senior Households (TCHC)
- 372 Family Portfolio (TCHC)
- 51 Seniors Housing Unit/TSHC

Referrals to the OCHE during this period increased by 188% compared to July 1, 2021, to December 31, 2021, when the OCHE received 200 referrals for arrears.

During this period of time, the OCHE received significantly more referrals due to the mandate change, which allowed for any TCHC tenant in arrears of rent to be referred to the OCHE.

¹ For reasons files were sent back to TCHC, please see the chart on page 13, "Mandate Expansion"

² A breach file is when a tenant has been assisted by the OCHE and entered into an LRA. The OCHE brokered LRA was breached.

³ Of the 577 household referred to OCHE, 51 were categorized as households with vulnerable tenants

During this period of time, the OCHE issued a total of 486 Reports and Recommendations after working with tenants. The OCHE successfully engaged with 86% (420/486) of these tenants and resolved the need for eviction for 79% (333/420) of the tenants they engaged with.

This is a decrease compared to the previous Bi-Annual Report (July to Dec 2021) where OCHE engaged with 87% (101/116) and avoided eviction for 88% (89/101) (July to Dec 2021).

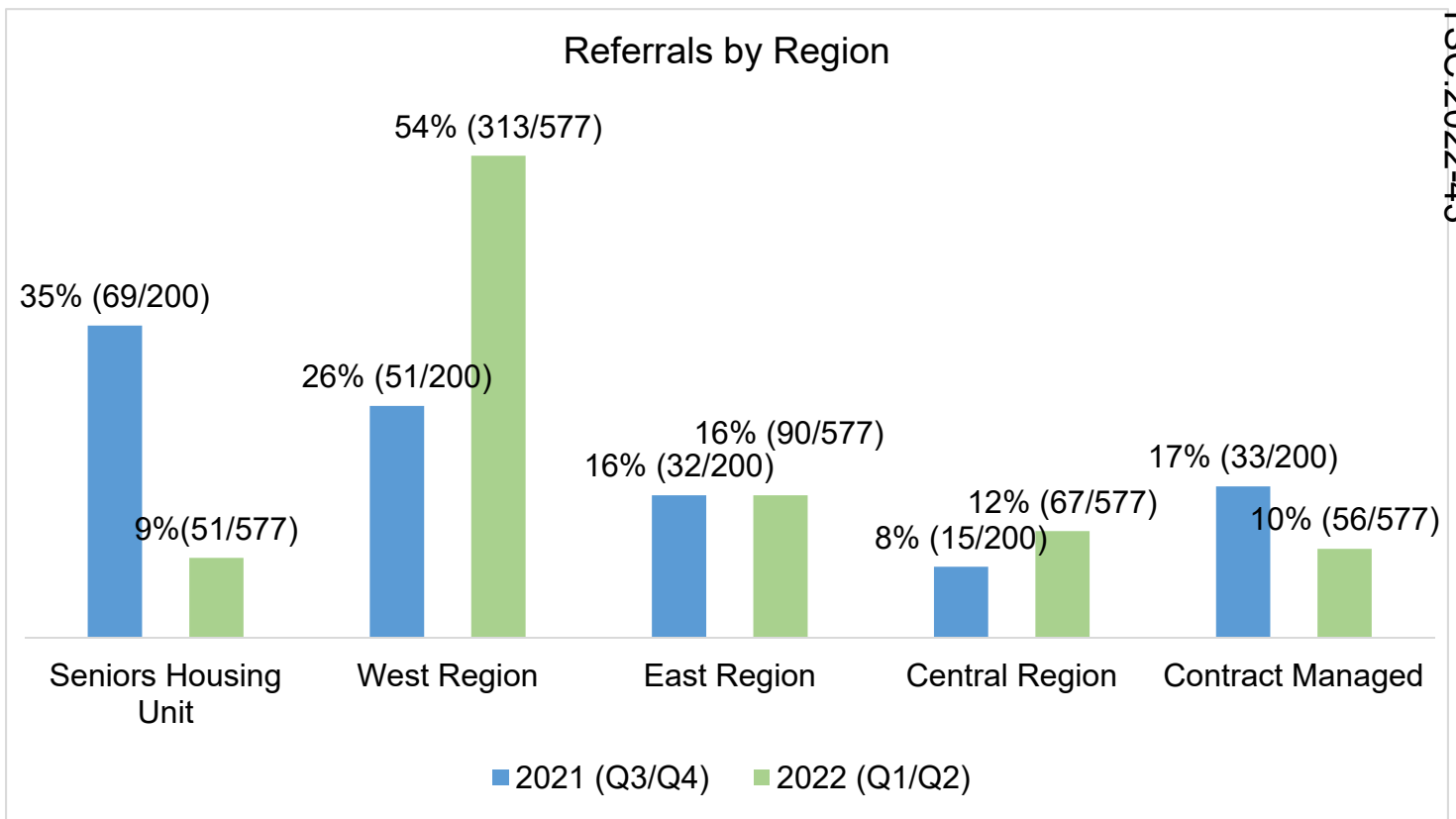
	2021(Q3/Q4) Last reporting period	2022(Q1/Q2) Current reporting period
Engagement Rate	87% (101/116)	86% (420/486)
Avoided the need for eviction	88% (89/101)	79% (333/420)

Due to the increase in referrals from tenant households which were not senior or deemed to be vulnerable, the OCHE noted a decrease in the total number of tenants who chose NOT to engage with the ERO. Additionally, the EROs noted that some households did not have a specific underlying issue leading to the arrears of rent which would ordinarily be resolved through case management or external referrals. This requires further data review.

1.1 REFERRALS BY REGION

The following chart shows the number of referrals to the OCHE by region:

Region	2021 (Q3/Q4)	2022 (Q1/Q2)
Seniors Housing Unit	35% (69/200)	9% (51/577)
West Region	26% (51/200)	54% (313/577)
East Region	16% (32/200)	16% (90/577)
Central Region	8% (15/200)	12% (67/577)
Contract Managed	17% (33/200)	10% (56/577)



1.2 ARREARS MANAGED

In this period, the OCHE recovered \$1,162,089.30 by managing arrears:

- \$185,460.70 direct payments, which included:
 - \$97,635.46 directly from tenants
 - \$65,373.04 Ontario Works /Ontario Disability Support Program Housing Stabilization Fund
 - \$3,220 in direct payments from Tenants' families and;
 - \$11,620.30 in payments directly from Ontario Works / Ontario Disability Support Program
 - \$7,611.90 in payments directly from the rent bank
- \$817,876.60 in OCHE brokered repayment agreements between TCHC and Tenants. Repayment Agreements represent a promise to pay over time.
- \$109,658 by resolving Loss of Subsidies.
- \$49,049 by completing an Annual Review or In-year review.

The following chart compares the arrears at the time of referral to the OCHE in the first half of 2022 to the most recent period before in 2021:

	2021(Q3/Q4)	2022(Q1/Q2)
Average Arrears at Time of First N4	\$2,559	\$1,663
Average Arrears at Time of Referral	\$4,644	\$3,615
Average Month Of Referral to OCHE After Arrears Started Accumulating	17 Months	16 Months***

*** Arrears which began to accumulate prior to June 28, 2021 fell under the old ACP for auditing purposes. Arrears which began to accumulate after this date fell under the new ACP for auditing purposes. 16 months represents the average of all files referred to OCHE during this time period. However, if we consider the Old vs. New ACP, there is improvement. Under the Old ACP, the average month of arrears at the time of referral to OCHE is 24 months. But under the New ACP, the average month of arrears at the time of referral to OCHE is 4 months.

There were 295 files that fell under the old ACP and 191 that fell under the new ACP.

2.0 COMMISSIONER'S SYSTEMIC RECOMMENDATIONS AS REPORTED THROUGH CASE-SPECIFIC AUDIT REPORTS

While working with individual tenants to avoid eviction and identify underlying issues, the OCHE also conducts an audit to ensure TCHC's compliance with the Arrears Collection Process, Eviction Prevention Policy and applicable legislation. At the conclusion of this work, the Commissioner issues a report containing tenant-specific and systemic recommendations to TCHC. From January 1, 2022 to June 30, 2022, the OCHE issued a total of 486 reports with a total of 1108 Recommendations.

	2021 (Q3/Q4)	2022 (Q1/Q2)
Number of recommendation reports	116	486
Number of Recommendations	370	1108

The recommendations, which are systemic in nature, follow the theme based audit categories which emerged through the analysis conducted for the OCHE's Systemic Recommendations Report. The continued review using the same theme based audit categories allows for a comparison of improvements over time. The theme-based audit categories are summarized in the chart below:

THEME-BASED SYSTEMIC AUDIT RECOMMENDATIONS	
1. ADMINISTRATIVE DELAYS AND INEFFICIENT USE OF RESOURCES	Administrative delays and inefficient use of resources create unnecessary costs to the organization. In particular: added time in which arrears are allowed to accumulate, reduced customer service levels, and inhibited workflows.
2. NON-COMPLIANCE WITH POLICIES AND PROCEDURES	Failure to comply with internal policies and procedures, specifically those related to the Eviction Prevention Policy, Arrears Collection Process, Loss of Subsidy Process and applicable legislation (<i>Residential Tenancies Act, 2006, Housing Services Act, 2011</i>) presents a liability to the organization and inequitable service to tenants.

THEME-BASED SYSTEMIC AUDIT RECOMMENDATIONS	
3. UNRELIABLE INTERNAL INFORMATION	TCHC has guidelines for recording information using internal databases, such as HMS, EasyTrac, and HoMES. Not following these guidelines can lead to inaccurate and unreliable information, interrupted workflows, and reduced trust in TCHC staff.
4. QUALITY OF SERVICE	Quality of service is vital for relationship building with tenants, fostering positive living environments, and ultimately keeping tenants housed.

2.1. Administrative Delays and Inefficient Use of Resources

The Arrears Collection Process was developed to assist staff with ensuring all tenants remain up to date with their rental accounts and, if tenants require assistance to do so, intervention is provided early. Failure to adhere to the timelines of the Arrears Collection Process results in increased arrears balances, evictions, and inequity among tenants. In these instances, TCHC also risks loss of revenue and an increase in uncollectible arrears.

The chart below outlines the Commissioner's recommendations related to administrative delays and inefficient use of resources:

Commissioner's Recommendations regarding Administrative Delays and Inefficient Use of Resources	2021 (Q3/Q4)	2022 (Q1/Q2)
Serve the Notice to Terminate the Tenancy Early for Non-Payment of Rent (N4) in accordance with Arrears Collection Process timelines	63% (73/116)	63% (307/486)
Refer to the OCHE according to the Arrears Collection Process timeline	58% (67/116)	21% (103/486)
Make direct contact with the tenant in the first month of arrears	43% (51/116)	50% (244/486)
Send the Eviction Prevention Policy Letter 1 once in the first month of arrears / Do not send multiple letters	41% (47/116)	32% (155/486) ⁴
Send the Notice to Terminate the Tenancy once / Do not send multiple N4s	9% (11/116)	22% (109/486) ⁵
After finding an error in the N4, issue a new one within the Arrears Collection Process timelines	9% (11/116)	3% (17/486)
Follow the Arrears Collection Process timelines in regard to Community Service Coordinator involvement	67% (4/6)	16% (5/32)

⁴ EPP Letter 1 is not part of the new ACP; therefore only files where the arrears began prior to July 2021 would this audit finding be applied.

⁵ We were told that during the transition to HoMES from HMS, multiple N4s were generated and recorded on the system as staff learned how to operate the new system.

The numbers above suggest that TCHC is improving in the area of sending files to the OCHE sooner, utilizing the Community Service Coordinator when necessary, and re-serving N4s which contained an error in a more timely fashion.

2.2 Non-Compliance with Policies and Procedures

The policies and procedures outlined in the Eviction Prevention Policy, Arrears Collection Process, Loss of Subsidy Process and applicable legislation (*Residential Tenancies Act, 2006, Housing Services Act, 2011*), ensure a fair and transparent process for tenants facing eviction due to arrears of rent. Failure to comply with internal policies and procedures can result in undue evictions, reduced transparency, and a lack of trust in the process. In these instances, TCHC risks damaging its relationship with tenants and its reputation.

The chart below outlines the Commissioner's recommendations related to non-compliance with policies and procedures:

Commissioner's Recommendations related to Non-Compliance with Policies and Procedures Recommendations	2021 (Q3/Q4)	2022 (Q1/Q2)
Pursuant to the Eviction Prevention Policy, do not send Eviction Prevention Policy Letter 3 to Vulnerable or Senior tenants	15% (17/116)	N/A ⁶
Pursuant to the Arrears Collection Process, ensure Local Repayment Agreements are in written format	3% (4/116)	16% (14/90)
Pursuant to the Arrears Collection Process, ensure direct contact is made with the tenant	3% (4/116)	2% (9/486)

⁶ In this period, no EPP Letter 3s were sent. It is not part of the new ACP, and it does not exist within HoMES.

Pursuant to the Arrears Collection Policy, ensure the Eviction Prevention Policy Letter 1 is sent to the tenant	3% (3/116)	<1% (2/486)
Pursuant to the Residential Tenancies Act, 2006, serve the Notice to Terminate the Tenancy to the tenant	2% (2/116)	1% (7/486)
Pursuant to the Housing Services Act, 2011, issue a reminder letter before the Loss of Subsidy takes effect according to the prescribed timelines	25% (1/4)	26% (17/66)
Pursuant to the Housing Services Act, 2011, make direct contact before and after issuing the Notice of Decision regarding Loss of Subsidy	25% (1/4)	11% (7/66)
Pursuant to the new ACP, make one fulsome and meaningful attempt to engage the Tenant to identify barriers and resolve arrears*	N/A*	7% (36/486)

* This is a new recommendation created for files where the new ACP was used. The expectation is that TCHC make a meaningful attempt to discover the reason for the arrears and to resolve them prior to referring the file to the OCHE. In cases where TCHC only contacted the Tenant to advise of the arrears but did not attempt to understand why the Tenant was in arrears, this recommendation was made.

2.3. Unreliable Internal Information

Unreliable internal information stems from non-compliance with TCHC documentation standards, leading to inaccurate record-keeping, invalid legal notices, and preventing proper workflow between staff and business units. In addition, unreliable internal information makes it more difficult for staff to engage with tenants to address arrears and effectively sustain tenancies. The overall number of recommendations regarding this issue has improved to 3% (14/486) of the audited files compared to 11% (13/116) in 2021 Q3/Q4. Of note, the new HoMES system went live June 28, 2021. Since that time, the OCHE has heard there have been issues with

documentation and information not being properly transferred from HMS to HoMES.

The chart below outlines the Commissioner's recommendations related to unreliable internal information:

Commissioner's Recommendations related to Unreliable Internal Information	2021 (Q3/Q4)	2022 (Q1/Q2)
Ensure tenant records are accurate and timely (HMS, EasyTrac and HoMES)	7% (8/116)	2% (10/486)
Ensure HMS Legal codes are accurate and are entered into the database (HMS and HoMES)	4% (5/116)	1% (4/486)

Documentation standards are improving with fewer errors in this area.

2.4. Quality of Services

TCHC is a diverse community with over 110,000 tenants and 220 dialects spoken. This population includes seniors and people with vulnerabilities, including low-income families. Within such a large community, it is to be expected that there are a number of tenants who require additional services and supports in order to maintain their tenancies. It is necessary for TCHC to provide these tenants with additional supports in order to sustain their tenancies, relying upon both internal and external supports.

This support may take the form of engaging external stakeholders such as caseworkers, family members, interpreters, income tax clinics, as well as internal supports, such as Community Services Coordinators. Failure to provide these supports affects vulnerable tenants disproportionately, given that they have less resilience than other tenants and likely would face greater challenges should they be evicted. The chart below outlines the Commissioner's recommendations related to quality of service:

Commissioner's Recommendations Regarding Quality of Service	2021 (Q3/Q4)	2022 (Q1/Q2)
Reach out to tenants' caseworkers or families should they get into arrears of rent	28% (33/116)	19% (96/486) ⁷
Refer tenants to a Community Services Coordinator should they get into arrears of rent or require other supports/referrals	11% (13/116)	2% (12/486)
Provide flexible and customized supports and accommodations to tenants as required (i.e., interpreters)	6% (7/116)	<1% (2/486)
Create flexible and custom payment schedules based on tenants' budgets and pay schedules	6% (7/116)	9% (44/486)
Create custom repayments with the tenants		2% (10/486)

Overall, there were fewer recommendations made in this category, which indicates greater compliance with the expectations of the ACP.

3.0 NEXT STEPS

Given the findings above, the Commissioner recommends that TCHC distribute the ACP widely and continue to work toward executing the steps quickly, with an eye to customer service.

3.1 Mandate Expansion of the OCHE

With the expansion of the OCHE mandate, the OCHE received significantly more files than in all previous years of operation. The positive result of this is that no vulnerable tenant will be missed due to an unidentified vulnerability. The negative result was that there were too many files for the

⁷ The Commissioner recommended TCHC reach out to caseworkers 96 times in this reporting period. It is the hope that when Tenants are in receipt of OW or ODSP, TCHC staff begin by reaching out to caseworkers as this often results in a favourable outcome and would avoid the need for the OCHE to get involved.

OCHE to process within the 45 Day timelines outlined in the OCHE Terms of Reference. With only five EROs, the workload quickly became unmanageable with individual caseloads peaking at near 80 files compared to 30 in all previous reporting periods.

As a result, the OCHE began sending files back to TCHC for the following reasons:

Reasons for sending files back to TCHC	Number of files
Arrears paid in full without OCHE's intervention	30% (27/90)
Tenant actively working with TCHC front-line staff to address arrears	18% (16/90)
Tenant no longer residing at the unit	13% (12/90)
Tenant completing/in the process of completing an Insitu application	6% (6/90)

While this helped streamline our referrals in part, it was not significant to curb the referrals. As a result, effective June 6, 2022, the OCHE advised TCHC that we would only accept 25 files per week and this is in addition to 10 files per week from TSHC.

TCHC issued communication to staff indicating that referrals to the OCHE should be streamlined and files that meet the following criteria are the priority: senior, vulnerable or difficult to resolve.

In reviewing the new ACP (Appendix 1), we expect that by making small changes to the expectations of front-line staff, more work will be completed prior to sending the file to the OCHE reducing the demand for OCHE services overall.

IMPLICATIONS AND RISKS:

The OCHE provides the Board with oversight of TCHC's operations related to evictions due to arrears of rent and ensures that tenants avoid eviction where possible. The OCHE reports regularly on its activities and TCHC's performance in the areas within OCHE's jurisdiction. This regular reporting by the OCHE ensures the Board is aware of the OCHE's activities taken on its behalf and that they continue to align with the goals of the Board and TCHC.

SIGNATURE:

“Summer Nudel”

Summer Nudel
Interim Commissioner of Housing Equity

ATTACHMENT:

1. Evaluation of the ACP June 28, 2021

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Appendix 1: Evaluation of the ACP June 28, 2021

The new ACP became effective on June 28, 2021 to coincide with the roll-out of TCHC's new HoMES data management system. The OCHE began receiving files that were subject to the new ACP in October 2021. Most files received by the OCHE prior to January 2022 relate to arrears which began prior to the roll-out of the new ACP. As a result, the evaluation of the ACP conducted by the OCHE covers the period of time between January 1, 2022 and June 30, 2022.

In this evaluation, we include a comparison between the files received during the same period of time which were audited based on the previous ACP. These are files where the arrears began to accumulate prior to July 2021 when the new ACP came into effect.

Of note, the difference between the new and previous ACP is most significant with respect to the number of steps required prior to the referral to the OCHE. Given that the new ACP has fewer steps, there are fewer places to make an error with the administration of the new ACP.

Define

In evaluating the new ACP the OCHE presumes the following desired outcomes:

1. Earlier and more productive interventions between TCHC and tenants in arrears.
2. Identification of the tenants' underlying issues in advance of resolving the arrears or referring the file to the OCHE.
3. Expedient referrals to the OCHE with 1-2 months of accumulated arrears.
4. Clear communication regarding the ACP with tenants to ensure that they feel knowledgeable and empowered to work with TCHC to resolve the arrears.
5. Inclusion of these components of the ACP to strengthen communication and relationships between front line workers and tenants:
 - Tenant appointments to discuss barriers/address arrears.
 - N4s served early to ensure transparency.

- One fulsome attempt to engage the tenant prior to referring the file to OCHE. This includes a discussion regarding the underlying issues resulting in arrears, the completion of a budget, appropriate referrals etc. Note that this intensive engagement may often require multiple contacts with the Tenant.

With these outcomes in mind, we present the data collected through the OCHE's work with both the file and the tenants. Some of the data was collected during the EROs' audit which draws on data stored in HMS, EasyTrac and HoMES. Some of the data was gathered through the EROs' work with the tenants to resolve the arrears and some of the data was gathered through tenant surveys.

Data

The OCHE collects data on all steps of the ACP that occur prior to the referral to OCHE. These include:

1. Review rent roll/monitor LRAs (*week 1 of first month of arrears*). This would be captured by the date of the first contact attempt.
2. Serve the N4 early (*13th - 15th of first month of arrears*)
3. One fulsome attempt which may involve multiple contacts to engage the tenant to address the arrears/discover underlying issues (*last two weeks of the first month of arrears*)
 - a. Possibly refer to a CSC (*CSC time is 20-40 business days*)
4. Refer to the OCHE (*second month of arrears unless CSC involved*)

This data was analyzed in the context of whether or not the new ACP is ensuring the key deliverables and objectives are being met.

Between January 1, 2022 and June 20, 2022 we audited 486 files. 191 were audited based on the new ACP because the arrears began to accumulate after July 1, 2021; and 295 were audited based on the old ACP as the arrears began to accumulate prior to July 1, 2021.

The following chart provides a comparison between the New and Old ACP:

	Old ACP	New ACP
Multiple mistakes related to the N4	109% (323/295)	61% (117/191)
No N4	2% (5/295)	1% (2/191)
N4 sent late	68% (202/295)	55% (105/191)
Multiple N4s sent	34% (99/295)	5% (10/191)
Admin error in N4 not corrected within 5 business days	6% (17/295)	0% (0/191)
Direct Contact Made late	56% (166/295)	41% (78/191)
No direct contact Made	2% (6/295)	2% (3/191)
Referral to OCHE within timelines	79% (234/295)	78% (149/191)
Referral to OCHE in timelines but NO meaningful attempt made first	3% (10/295)	71% (136/191)
Referrals with all steps of the ACP followed	4% (11/295)	26% (49/191)
No fulsome attempt made to address the arrears	N/A	10% (20/191)
CSC intervention within timelines	18% (2/11)	5% (1/21)

The findings above indicate that fewer mistakes in executing the ACP occurred under the new ACP. TCHC had fewer mistakes related to the N4 in all ways. Serving the N4 as the first step in the ACP process appears to be a positive change, as evident by the chart above. The N4 is being served on time more often, without duplication, and without error requiring re-serving. Of note, the number of mistakes related to the N4 is 45% improved compared to the old ACP.

We note that in 7% (36/486) of cases the Commissioner found that TCHC missed an opportunity to resolve the arrears prior to referring the file to the OCHE. In all other cases, TCHC documented their attempts to resolve the arrears with the Tenant and/or it was not clear what more TCHC could have done to resolve the file on their own.

	Old ACP	New ACP
Average Arrears at Time of First N4	\$1,940	\$1,234
Average Arrears at Time of Referral	\$4,540	\$2,186
Average Month Of Referral to OCHE After Arrears Started Accumulating	24 Months	4 Months
Number of LRAs brokered by TCHC before referral to OCHE	27% (80/294)	5% (10/191)

Discussion

With respect to the desired outcomes as outlined above, the new ACP appears to be getting closer to achieving them than the old ACP. We note that in 7% of the files reviewed, more could have been done to engage the Tenant and/or to identify underlying issues leading to the arrears of rent before referring to the OCHE.

Referrals to the OCHE within the ACP timelines improved; however, we note that in 71% of the files reviewed in this time period no attempt was made to identify the underlying issue and/or to resolve them prior to making the referral to the OCHE.

Tenant Input

Beginning in March 2022, the OCHE began canvassing Tenants who worked with the EROs to find out if they were knowledgeable of the new ACP in practice. They were asked whether they were aware of their arrears, if TCHC had made an attempt to assist the Tenant to resolve the arrears, and if they were aware that TCHC was required to schedule a meeting and to discuss the arrears with the Tenant. The results of the survey follow:

Tenant Survey Results

<u>Did you know you were in arrears of rent/lost your subsidy?</u>	<u>Do you know and understand the steps of the ACP (eg. Send the N4, reach out to Tenant, attempt to resolve arrears, refer to CSC, refer to OCHE)?</u>	<u>Did you feel TCHC/TSHC you were offered the support you needed to resolve of your arrears?</u>
Yes: 90% (121/134) No: 9% (12/134) No answer: 1% (1/134)	Yes: 29% (39/134) No: 70% (94/134) No answer: 1% (1/134)	Yes: 36% (49/134) No: 63% (84/134) No answer: 1% (1/134)

Discussion of results:

According to the feedback we received from Tenants, 90% of the respondents were aware that they were in arrears of rent. However, 63% reported that TCHC staff did not support them to resolve the arrears prior to the file being referred to the OCHE. This is consistent with the data collected indicating that 71% of the referrals to OCHE were sent before any attempt to resolve the arrears was made.

Of interest, 70% of Tenants advised they were not aware of the ACP or what to expect from TCHC staff with respect to it. If more Tenants had an understanding of what to expect when they get into arrears of rent, it is possible they would be more willing to respond to staff who reach out to them to resolve the arrears. If Tenants can expect that the Tenant Service Coordinators will help them develop a plan to address the arrears that considers their unique circumstances, it is to be expected more Tenants will be willing to engage.

Recommendations

The OCHE data analysis suggests that the new ACP is working well in the following areas: addressing arrears more quickly (either with a referral to the OCHE or TCHC intervention); CSC involvement within timelines; fewer

errors related to the N4. In other areas it is not working as well. Most significant, is the referral to OCHE before engaging the tenant at all or attempting to meaningfully identify the underlying issue causing the arrears or attempting to resolve it.

Based on this analysis, the OCHE makes the following recommendations:

1. Staff training on OCHE approach for 1 meaningful engagement
2. Amend ACP to provide room for TCHC to resolve the arrears themselves
3. Continue to support staff to identify arrears after the first missed rent payment, and to serve the N4 immediately. Encourage staff to schedule tenant meetings to discuss arrears and to include education on the ACP in that meeting.
4. TCHC to provide workshops to Tenants on the new ACP.