



## Office of the Commissioner of Housing Equity (“OCHE”) Bi-Annual Update – January 1 to June 30, 2024

Item 13A

October 18, 2024

Board of Directors

**Report:** TCHC:2024-66

**To:** Board of Directors (the “Board”)

**From:** Tenant Services Committee (“TSC”)

**Date:** September 27, 2024

### **PURPOSE:**

The purpose of this report is to provide the Board with the Office of the Commissioner of Housing Equity’s (“OCHE”) Bi-Annual Update for the period of January 1 to June 30, 2024.

### **RECOMMENDATIONS:**

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

### **TSC:**

The recommendations were approved by the TSC on September 27, 2024.

### **REASONS FOR RECOMMENDATIONS:**

The Bi-Annual Update highlights the OCHE’s case management, audit, and policy work focuses on the work metrics as outlined in the Board-approved OCHE Work Plan.

**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:**

*“Melanie Martin”*

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Melanie Martin  
Interim Commissioner of Housing Equity

**ATTACHMENT:**

1. Bi-Annual Report – January 1 – June 30, 2024

**STAFF CONTACT:**

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Item 13A – Office of the Commissioner of Housing (“OCHE”) Bi-Annual Update –  
January to June 2024  
TCHC Board Meeting – October 18, 2024  
Report #: TCHC:2024-66  
**Attachment 1**

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## **INTRODUCTION – JANUARY 1 TO JUNE 30, 2024**

In this report, the OCHE provides an update on the work completed in the period between January 1 and June 30, 2024. In this period, the OCHE continued to work with TCHC toward the implementation of the Commissioner’s systemic recommendations outlined in the OCHE Bi-Annual Reports, from January 1 to December 31, 2023. A progress report on the implementation of these recommendations is included in Appendix 1.

In this period, the OCHE completed five case conferences, co-facilitated by the OCHE and Program Services with an average of 40 TCHC frontline staff in attendance per session. The OCHE also provided three training sessions to the 2025 Arrears Collection Process (“ACP”) Pilot group on the role of the OCHE in the execution of the ACP, including how files are screened and the steps taken to resolve a case.

The OCHE began a Pilot with the Toronto Rent Bank in June 2024, which has resulted in improved results with respect to arrears collection. The details of this Pilot are described in Section 6.0.

In this Report you will also find the results of the OCHE Case Management and Audit Findings.

### **1.0 REFERRALS TO THE OCHE**

The OCHE received 598 referrals from TCHC between January 1 and June 30, 2024. In comparison to the same period in 2023, when the OCHE received 508<sup>1</sup> files.

Of those referrals:

- 113 were sent back (details provided in section 1.1 of this report)
- 110 were breach files<sup>2</sup>
  - Of the breach files, 72 files were sent back (details provided in section 6.0 of this report)

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<sup>1</sup> 113 sent back; 91 breach files; 302 were assigned to an ERO

<sup>2</sup> A breach referral occurs when a Tenant has been assisted by the OCHE and entered into a Local Repayment Agreement (LRA) and the OCHE brokered LRA has been breached.

- 375 Households were assigned to an ERO to stabilize the tenancies, and to be audited for compliance with the TCHC Eviction Prevention Policy (“EPP”) and the ACP.

The OCHE returned 113 files to allow TCHC to do more work toward resolving the arrears. This process has been working well to improve compliance with the ACP and to empower TCHC to achieve results without the need for the OCHE.

As part of the referral process, it was recommended in our last reporting period, that the system for referring files to the OCHE and returning files to TCHC be embedded in the HoMES system. This was accomplished and the results have been positive. Frontline staff have reported that it takes less time to complete the Stage 1 Checklist using the new process.

### **1.1 REFERRALS SENT BACK TO TCHC**

The chart below was provided by TCHC and shows the status of the 113 files that were sent back to TCHC as of July 19, 2024. TCHC and the OCHE are pleased with these results as only 17 of the 113 files were subsequently re-referred to the OCHE, while TCHC found a resolution in 61 of the 133 files and are continuing to seek resolutions in the remaining 35 files, which resulted in the arrears being reduced by \$145,471.12.

<b>Outcomes</b>	<b>Number of cases</b>	<b>Sum of Arrears at OCHE referral</b>	<b>Sum of Balance July 19, 2024 (total owing)</b>	<b>Sum of Difference</b>
Managed by TCHC (LRA, Paid in Full, Moved out, Antisocial)	61	\$476,002.10	\$354,356.98	-\$121,645.12
TCHC working with the tenant on the OCHE recommendation	35	\$226,664.57	\$228,293.57	\$1,629.00
Sent Back to OCHE	17	\$133,964.15	\$108,509.15	-\$25,455.00
<b>Grand Total</b>	<b>113</b>	<b>\$836,630.82</b>	<b>\$691,159.70</b>	<b>-\$145,471.12</b>

## 2.0 ARREARS AT TIME OF OCHE REFERRAL

375 cases were assigned to an ERO from January 1 to June 30, 2024, which represented a total of \$3,301,297.54 in arrears owing. Of these, there were 28 cases where the arrears exceeded \$20,000.00, representing more than \$748,566.29 in arrears of rent. In this period, the OCHE was referred 111 files with arrears over \$10,000.00 representing \$1,522,377.37 in arrears of rent.

In the previous period, the OCHE recommended that TCHC review all files with arrears over \$10,000.00 as part of the Large Balance Pilot and determine how to report on these files separately. As a result, TCHC focused their arrears collection efforts on files with over \$10,000.00 in arrears and prioritized these referrals to the OCHE.

According to TCHC, *“In Q2 2024, residential and parking arrears decreased by \$732,391.30, a 3% reduction from Q1 2024. This decrease was driven by increased compliance with the Arrears Collection Process, early intervention and targeted recommendations from the Office of the Commissioner of Housing Equity (“OCHE”), specifically focused on reducing arrears files over \$10,000. As a result of these recommendations and efforts, there was a significant reduction of \$2.5M in these high-value arrears files from February to June 2024, which substantially contributed to the overall decrease.”*<sup>3</sup>

Following from this, the criteria for dealing with files that have large balances is being finalized by the OCHE, the City of Toronto and TCHC and the expectation is that this will be rolled out by the end of 2024. The OCHE will report on the results of the Large Balance Pilot in 2025.

In this period, the OCHE continued to capture data by Region<sup>4</sup> and organized the size of the arrears at the time of referral into sub-categories. A breakdown of the size of arrears by region is included in the following charts:

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<sup>3</sup> TCHC Q2 Operational Performance Report (presented to Tenant Services Committee - September 30, 2024)

<sup>4</sup> Effective July 31, 2024, TCHC has 43,270 active units. Broken down by regions as follows: West 14,938; East 13,826; Central 14,506.

<b>\$20k and over– owing at time of referral</b>	<b>Total of arrears</b>	<b>Number of Households</b>
<b>WEST</b>	\$179,289.06	7
<b>EAST</b>	\$467,158.51	17
<b>CENTRAL</b>	\$102,118.72	4
<b>TOTAL:</b>	\$748,566.29	28

<b>\$10k – \$19.9k owing at time of referral</b>	<b>Total of arrears</b>	<b>Number of Households</b>
<b>WEST</b>	\$454,542.77	34
<b>EAST</b>	\$565,741.55	43
<b>CENTRAL</b>	\$502,093.05	34
<b>TOTAL:</b>	\$1,522,377.37	111

<b>\$5k – \$9.9k owing at time of referral</b>	<b>Total of arrears</b>	<b>Number of Households</b>
<b>WEST</b>	\$269,798.78	39
<b>EAST</b>	\$206,374.11	28
<b>CENTRAL</b>	\$172,829.27	22
<b>TOTAL:</b>	\$649,002.16	89

<b>\$2k – \$4.9k owing at time of referral</b>	<b>Total of arrears</b>	<b>Number of Households</b>
<b>WEST</b>	\$150,957.15	42
<b>EAST</b>	\$115,695.85	36
<b>CENTRAL</b>	\$47,778.56	14
<b>TOTAL:</b>	\$314,431.56	92

<b>\$186.00 – \$1.9k owing at time of referral</b>	<b>Total of arrears</b>	<b>Number of Households</b>
<b>WEST</b>	\$37,485.69	32
<b>EAST</b>	\$26,089.47	20
<b>CENTRAL</b>	\$3,345.00	3
<b>TOTAL:</b>	\$66,920.16	55

### **3.0 ARREARS COLLECTION PROCESS COMPLIANCE:**

While working with individual Tenants to avoid eviction, the OCHE conducts an audit to ensure TCHC's compliance with the ACP, Eviction Prevention Policy and that all applicable legislation has been adhered to. At the conclusion of this work, the Commissioner issues a report containing recommendations to TCHC and to the Tenant. From January 1 to June 30, 2024, the OCHE issued a total of 333 reports with a total of 12 unique recommendations.

Although the OCHE has screened the files ahead of time to ensure ACP compliance, the screening process does not consider the timelines of the ACP, but rather whether all the steps were completed. As the ACP 2025 will be fully implemented by the end of 2024, timing will be considered once again. This will ensure that no file with an arrears balance is left without intervention.

It should be noted that in 46 of the 333 reports (14%), the ACP was followed perfectly. It must be stated that the decrease in ACP compliance is due to the priority referrals of files with large balances where the arrears were older.

The OCHE audit findings for this period are described in the chart below. Of the 12 unique recommendations made to TCHC, three were significant.



<b>Commissioner’s Recommendation related to Non-Compliance with the ACP</b>	<b>2023 (Q1/Q2)</b>	<b>2023 (Q3/Q4)</b>	<b>2024 (Q1/Q2)</b>
<b>Number of recommendations reports</b>	<b>306</b>	<b>256</b>	<b>333</b>
Serve the Notice to Terminate the Tenancy in accordance with Arrears Collection Process timelines	62% (189)	59% (150)	69% <sup>5</sup> (230)
Make direct contact with the Tenant in the first month of arrears	64% (195)	45% (114)	56% <sup>6</sup> (186)
Send the Notice to Terminate the Tenancy once/ Do not send multiple Notices to Terminate the Tenancy	22% (68)	15% (38)	22% <sup>7</sup> (73)

**4.0 OCHE CASE MANAGEMENT HIGHLIGHTS**

The OCHE issued 333 Reports and Recommendations and successfully engaged with 97% (322/333) of these Tenants and resolved the need for TCHC to file an L1 Application with the Landlord Tenant Board (LTB) in 80% (268/333) of the Tenants they engaged with.

	<b>2023 (Q1/Q2)</b> <b>306 Reports Issued</b>	<b>2023 (Q3/Q4)</b> <b>256 Reports Issued</b>	<b>2024 (Q1/Q2)</b> <b>333 Reports Issued</b>
<b>Engagement Rate</b>	96% (295)	95% (243)	97% (322)
<b>Avoided the need for TCHC to file an L1 Application with the LTB</b>	84% (249)	85% (206)	80% (268)

<sup>5</sup> Average: Served in the 9<sup>th</sup> month of arrears

<sup>6</sup> Average: Made in the 6<sup>th</sup> month of arrears

<sup>7</sup> Average 2.5 served

## 4.1 ARREARS MANAGED BY THE OCHE

In this reporting period, the OCHE issued 333 reports, which accounted for \$3,418,281.54 in arrears.

(a) Total arrears directly paid to TCHC totaled \$1,012,304.58 (187 cases, 30% of total) as follows:

- Direct payments totaled \$219,753.85 from the following sources:
  - \$61,053.00 (31 cases) directly from Tenants
  - \$121,522.41 (60 cases) Housing Stabilization Fund (HSF)
  - \$3,151.49 (1 case) in direct payments from Tenants' families
  - \$10,335.61 (5 cases) in payments directly from Toronto Employment and Social Services/Ontario Disability Support Program
  - \$14,107.00 (5 cases) in payments directly from the Toronto Rent Bank
  - \$4,216.00 (1 case) in payments from the Eviction Prevention in the Community (EPIC) Program
- \$5,368.34 (5 cases) in TCHC credits
- Resolving Losses of Subsidy: \$670,626.23<sup>8</sup> (43 cases)
- Completing Annual or an 'In Year' Reviews: \$121,924.50 (36 cases)

(b) Arrears managed through LRAs

- \$1,772,943.22 (203 cases, 52% of total) in arrears were managed through LRAs and will be paid back to TCHC over time (see section 5.0) and have not yet been collected in full.

(c) Arrears approved to be forwarded to the Landlord and Tenant Board

- \$636,221.08 (65 cases, 19% of total) in arrears were not resolved by the OCHE and it was instead recommended that TCHC file an L1 Application at the LTB, where the Tenant would have an opportunity to enter into a Mediated Agreement.

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<sup>8</sup> The total dollar value of this intervention doubled from \$367,589.00 in our last reporting period.

## 5.0 ARREARS MANAGED THROUGH LOCAL REPAYMENT AGREEMENTS

In this period, the OCHE brokered a total of 203 LRAs representing \$1,772,943.22 in arrears. The success of these LRAs relies on Tenants making the payments every month for the life of the agreement.

Below is a summary of the LRAs brokered by the OCHE based on these categories:

<b>Files with arrears over \$20K</b>	<b>Total of arrears</b>	<b>Number of Cases</b>	<b>Average repayment amount</b>	<b>Average length of LRA (months)</b>
<b>WEST</b>	\$164,156.58	5	\$238.00	167
<b>EAST</b>	\$107,284.00	4	\$255.00	149
<b>CENTRAL</b>	\$93,516.00	3	\$150.00	223
<b>TOTAL/AVERAGE:</b>	\$364,956.58	12	\$222.00	175

<b>Files with arrears between \$10k and \$19.9K</b>	<b>Total of arrears</b>	<b>Number of cases</b>	<b>Average repayment amount</b>	<b>Average length of LRA (months)</b>
<b>WEST</b>	\$254,762.49	18	\$173.00	112
<b>EAST</b>	\$270,977.82	20	\$182.00	96
<b>CENTRAL</b>	\$230,810.48	16	\$177.00	116
<b>TOTAL/AVERAGE:</b>	\$756,550.79	54	\$178.00	107

<b>Files with arrears between \$5k and \$9.9K</b>	<b>Total of arrears</b>	<b>Number of cases</b>	<b>Average repayment amount</b>	<b>Average length of LRA (months)</b>
<b>WEST</b>	\$198,886.27	27	\$153.00	61
<b>EAST</b>	\$163,460.55	22	\$177.00	56
<b>CENTRAL</b>	\$70,713.55	9	\$162.00	71
<b>TOTAL/AVERAGE:</b>	\$433,060.37	58	\$163.00	61

<b>Files with arrears between \$2k and \$4.9k</b>	<b>Total of arrears</b>	<b>Number of cases</b>	<b>Average repayment amount</b>	<b>Average length of LRA (months)</b>
<b>WEST</b>	\$90,744.13	27	\$124.00	37
<b>EAST</b>	\$70,773.16	19	\$153.00	32
<b>CENTRAL</b>	\$29,361.37	9	\$169.00	30
<b>TOTAL/AVERAGE:</b>	\$190,878.66	55	\$141.00	34

<b>Files with arrears between \$186.00 and \$1.9k</b>	<b>Total of arrears</b>	<b>Number of cases</b>	<b>Average repayment amount</b>	<b>Average length of LRA (months)</b>
<b>WEST</b>	\$12,904.46	13	\$89.00	11
<b>EAST</b>	\$8,040.00	7	\$149.00	15
<b>CENTRAL</b>	\$6,552.36	4	\$121.00	16
<b>TOTAL/AVERAGE:</b>	\$27,496.82	24	\$112.00	13

In this period, TCHC’s priority referral of files with larger balances accounts for the increased length of the LRAs. As stated, this is positive due to the focus on cleaning up these files with the intention of enrolling many of these tenants in the Large Balance Pilot.

**6.0 BREACHED OCHE NEGOTIATED LOCAL REPAYMENT AGREEMENTS**

When a Tenant breaches an LRA that was negotiated by the OCHE, it is expected that TCHC staff will reach out to the Tenant after the first missed payment, and then re-refer the file to the OCHE if the Tenant cannot catch up by the second month. Missing this window makes recouping arrears more difficult as they will have a larger debt to TCHC. TCHC has recently changed from a manual process to using HoMES to catch missed payments and this is expected to lead to a decrease in time between when the Tenant breaches and the re-referral to the OCHE. In fact, in 2024, the OCHE has already seen an increase in breach referrals in comparison to the last reporting period in 2023, and it is anticipated that as this process is fine-tuned, the length of time between when a tenant breaches to when the file is re-referred to the OCHE will steadily decrease from the current 7<sup>th</sup> month average.

The following chart describes the breach referrals received in 2024:

<b>Breach Files</b>	<b>January 1 – June 30, 2023</b>	<b>July 1 - December 31, 2023</b>	<b>January 1 - June 30, 2024</b>
Total Breach Referrals	92	74	110
Total Sent back cases <sup>9</sup>	20	21	22
No Exceptional Circumstances <sup>10</sup>	57	51	38
Unable reach the Tenant to determine exceptional circumstances	8	9	12
Exceptional Circumstance - Report issued to TCHC	34	20	37
Average month the Tenant breached the OCHE brokered LRA	4 months	4 months	6 Months
Average month of referral to OCHE after breach <sup>11</sup>	4 months	8 months	7 Months

### **Community Partnership: Toronto Rent Bank**

In early 2024, the OCHE met with the City of Toronto Housing Secretariat, Neighborhood Information Post (“NIP”) TCHC and TSHC to discuss a Pilot program. The Pilot was to determine whether it was feasible for the Rent Bank Program to be extended to TCHC and TSHC Rent Geared to Income (“RGI”) tenants to support them to address arrears of rent and avoid eviction and ensure successful tenancies. Traditionally, the Rent Bank program was only available to market rent tenants across the City of Toronto to support them with addressing rental arrears. It was a

<sup>9</sup> Reasons for being sent back: Tenant caught up with LRA (13), non-compliance with ACP (TCHC did not attempt to contact Tenant in 1<sup>st</sup> month) (5), sent in error (2) unit abandoned (1) and Tenant engaged with TCHC (1).

<sup>10</sup> This is determined when there is no change in the Tenant’s circumstance and/or the Tenant agrees to catch up with the LRA.

<sup>11</sup> As per the ACP a file is to be re-referred to the OCHE in the second month after a breach occurs.

loan of 3 months' rent to be repaid over time. However, during Covid, the loan became a grant—but it remained available only to market rent tenants.

The Pilot was developed in collaboration with the Housing Secretariat, NIP, TSHC and TCHC and it was determined that OCHE would be the administrator of the RGI Rent Bank Pilot and the only organization who can refer RGI Tenants to the Rent Bank for funding. The funding covers up to 4 months RGI rent to a maximum of \$5,000.00 per tenant, every 12 months. As of June 2024, the OCHE has been referring cases to the Toronto Rent Bank for assistance with RGI Tenants' arrears of rent.

Due to this partnership, the OCHE has been able to decrease the length of LRAs, and in many cases eliminate a Tenant's arrears in full. This has been especially helpful for tenants whose underlying issue is poor budgeting. EROs will still work with Tenants to reflect on their spending, refer to Voluntary Trustees or financial experts, but it can take the pressure off Tenants whose budgets are tight, and choices are being made between necessities and arrears repayments.

## **Conclusion**

During this period, the OCHE worked with TCHC toward the implementation of the systemic recommendations made in 2023. Strides have been made to increase TCHC's capacity to manage arrears files without the need for an OCHE intervention in more instances, and to decrease the arrears total across the organization.

The details of the progress made on each specific Recommendation can be found in the Appendices to this Report. With respect the Recommendations which are well underway, a brief summary of the results follows:

As stated in Section 1.0, TCHC has successfully embedded the Stage 1 Checklist into HoMES providing OCHE access to it and eliminating the extra time needed to send referrals to the OCHE and for the OCHE to review and send back. The positive result of this accomplishment is the increased efficiency with respect to referrals and ACP Compliance Screening between OCHE and TCHC.

The OCHE, City Partners and TCHC, developed a time specific methodology for both tracking and enforcing arrears management for files which fall under strict criteria with a focus on files where the arrears exceed \$10,000.00. This Pilot will be underway by the end of 2024 and the results will be reported on in 2025.

TCHC has begun the process of re-establishing the Memorandum of Understanding between Toronto Employment and Social Services (“TESS”) and TCHC has started to improve the process of information sharing and communication. The OCHE coordinated a meeting between TESS and TCHC management and has convened a similar meeting between TCHC and ODSP which will take place in August 2024. This has already assisted the Regions in gaining better results with respect to working with Tenants’ Caseworkers at TESS and ODSP.

With respect to the recommendations made to the ACP 2025, these have been accepted and the first groups of Tenant Service Coordinators, Community Service Coordinators, and Tenancy Management Supervisors have been trained. The OCHE participated in the training by providing a module on the OCHE process, which was met with positive feedback.

The OCHE is excited about the progress being made to address arrears of rent through collaboration with TCHC and community partners, and this can only continue to evolve in a positive way as the implementation of the Recommendations continues.

**APPENDIX 1: PROGRESS UPDATE RECOMMENDATIONS SUMMARY JANUARY 1 TO JUNE 30, 2023**

OCHE RECOMMENDATION	TCHC RESPONSE	EXPECTED COMPLETION DATE	PROGRESS UPDATE (2023)	PROGRESS UPDATE (2024)
<p><b>Recommendation 1:</b>  TCHC to embed the Stage 1 Checklist into HoMES and to provide OCHE access to it so as, to eliminate the extra time needed to send referrals to the OCHE and for the OCHE to review and send back.</p>	<p>Work is underway to incorporate the Stage 1 (N4) Checklist into HoMES. As a result of collaborative work between TCHC and OCHE, the Checklist has been revised, and Operations staff are working with OCHE, ITS and YARDI to implement the required changes in HoMES as quickly as possible. Testing, to be conducted with TCHC and OCHE SMEs, with support from ITS, is expected to take place in November.</p>	<p><b>January 2024 Revised to April 2024<sup>12</sup></b></p>	<p>The testing phase is complete, and implementation (communications and training for TSCs) was launched in March. Expected go-live for checklist and OCHE access is April 2024</p>	<p>Recommendation completed – Paperless Stage 1 Checklist fully implemented and integrated into HoMES in April 2024 and is working well.</p>
<p><b>Recommendation 2:</b>  In collaboration with the OCHE, City Partners and TCHC, develop a time specific methodology for both tracking and enforcing</p>	<p>Management is in final stages of recruitment for a Manager of Tenancy Management - Centralized Services. This new role and their team will be accountable for:</p>	<p><b>December 2023</b></p>	<p>Manager Tenancy Mgmt Centralized Services came on board in December 2023. Reporting and tracking on \$10k+</p>	<p>In February 2024, 729 files were identified as having arrears of more than \$10,000. Approx 34% of those files required follow up with the regional teams, with the remaining 66% of files already</p>

<sup>12</sup> Revision to timelines due to hiring delays on Manager Tenancy Management and Centralized Services role.



<p>arrears management for files which fall under strict criteria. Consideration should be given to the management of files where the arrears exceed \$10,000.00. By keeping track of these files separately from newer arrears files, TCHC will be able to accurately determine the success of the ACP. This tracking needs to be in place before the roll-out of the new ACP.</p>	<ul style="list-style-type: none"> <li>- developing tracking methodology and oversight process</li> <li>- tracking of high dollar value arrears files</li> <li>- providing support to regional Tenancy Management teams to ensure these files are being addressed according to the process.</li> </ul> <p>Anticipated start date for the new role is mid-October</p>		<p>arrears files is in place and monitoring and support with regional teams is happening bi-weekly on an ongoing basis.</p>	<p>being addressed through a repayment agreement or actioned at the LTB. This regional intervention saw 94% of the files fully addressed (via repayment agreement, paid in full or referred to OCHE) and the remaining 6% requiring ongoing regional interventions due to the complexity of the file.</p> <p>With the completion of the 10K project, the team has been working to address arrears files in the \$7,000-\$10,000 range. As of May 1<sup>st</sup>, 1224 accounts have been identified within this bucket with 341 accounts requiring further follow up by the TSC's and CSC's. This project will be completed in Q4.</p> <p>Tracking is ongoing and will be integrated into the reporting dashboard for the revised ACP implementation, and learnings from this work have been incorporated into the ACP planning and roll-out.</p>
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			<p>Work with the City and OCHE on a time specific methodology for addressing high arrears files in underway and a proposal is expected to come forward for review in Q2 2024.</p>	<p>The components of this recommendation related to reviewing and tracking arrears exceeding \$10,00 are completed.</p> <p>Work with OCHE and Finance on the proposal for a time specific intervention for high arrears files is ongoing with a revised timeline of Q4 2024. The revised timeline is a result of resource challenges and additional complexity in implementation planning being raised through the cross-divisional collaboration.</p>
<p><b>Recommendations 3:</b> <i>ACP Recommendations</i></p> <ul style="list-style-type: none"> <li>a. TCHC should update the ACP to require N4 to be served in the second month of arrears (one month plus a \$1.00 of arrears owing).</li> <li>b. Modify HoMES to ensure timely creation</li> </ul>	<p>A revised ACP is in development with expected implementation beginning in Q1 2024.</p> <ul style="list-style-type: none"> <li>a) On implementation of the new ACP, TCHC will begin serving the N4 once a household is at least one month behind on paying their rent.</li> </ul>	<p><b>Q1 2024 Revised Q2 2024<sup>13</sup></b></p>	<p>The draft of the revised ACP is complete and is under review with staff and stakeholders for input. Training will be complete by end of June with the new Process in place on July 1.</p>	<ul style="list-style-type: none"> <li>- Revised ACP implemented in three pilot portfolios (1 in each region) in July-Sept 2024.</li> <li>- Training and Implementation of the new ACP is underway for Q4, with a phased in approach by region.</li> <li>- Work with Finance to address pain points in rent processing workflow is underway</li> </ul>

<sup>13</sup> Revision to timelines due to hiring delays on Manager Tenancy Management and Centralized Services role.

<p>of N4s and reduce the number that need to be created manually.</p> <p>c. Ensure finance processes rent payments early so that they are all posted before N4s are issued to tenants.</p>	<p>b) As part of the work to revise the ACP, a cleanup process will be undertaken to address complexity within some of the arrears files, which will in turn result in a decrease in the number of manual N4s required. Additionally, the Operations team is working with ITS to implement reporting that will provide specific information about issues with N4s. This information will inform future Management actions to address any HoMES changes that are needed, in conjunction with any required staff training and process changes.</p> <p>c) Throughout the revision and implementation phase of the ACP, Operations, Finance and ITS will be working together to reduce pain points within the rent processing workflow and to ensure that rent payments are processed</p>		<p>KPIs are in development alongside the ACP and revisions to Power BI dashboard are underway to provide staff with access to more reporting aligned with the steps of the new process.</p> <p>ACP compliance reporting and meetings with regional management teams have been implemented</p>	<p>- Revised process-based reporting dashboard is in place, developed in partnership with Performance and Quality and the Power BI team in ITS. Full roll out of the dashboard and associated KPI monitoring will take place in alignment with the full ACP implementation in Jan 2025.</p>
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<p>d. OCHE to issue monthly ACP compliance reports to TCHC by Region, for more up to date monitoring of OCHE recommendations and schedule monthly meetings with TCHC to review trends and compliance.</p> <p>e. Create a new Key Performance Indicator (“KPI”) for the Regions which monitors and evaluates ACP Compliance regionally.</p>	<p>and available for staff review within HoMES as early in the month as possible.</p> <p>d) TCHC’s regional team will actively participate in the monthly ACP compliance meetings.</p> <p>e) The Operations centralized teams (Performance and Quality, and Operational Planning and Program Services), are working with the Regional Tenancy Management teams to develop new KPIs associated with the implementation of the revised ACP. One of the KPIs will relate to overall compliance levels with the ACP.</p>			
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<p><b>Recommendation 4:</b> TCHC to re-establish the <i>Memorandum of Understanding</i> between Ontario Works and TCHC and endeavor to improve the process of information sharing and communication between them where a mutual interest in stabilizing tenancies exists. Specifically, TCHC management to reach out to OW management to clarify the need for OW Caseworkers to cooperate in the resolution of arrears for their clients, and to apply to the Housing Stabilization Fund to assist tenants address their arrears balances.</p>	<p>The relationship management role for overall engagement between TCHC and Toronto Employment and Social Services has been consolidated to the Operations Planning and Program Services (OPPS) team, with relationship management with local TESS offices being situated with Regional Tenancy Management teams. Given this clarity, the Director OPPS will engage with TESS leadership, with support from the Housing Secretariat, to review and re-establish the MOU. The discussion will include development of roles and expectations for local teams at TCHC and TESS.</p>	<p><b>Q1 2024 Revised to Q2 2024<sup>14</sup></b></p>	<p>Aggregate data related to Ontario Works clients who are at risk of losing subsidy has been shared with the Housing Secretariat and is under review and will inform ongoing discussions the Toronto Employment and Social Services (TESS). Engagement with TESS to negotiate a revised MOU is underway</p>	<p>Regular meetings in place between TESS and TCHC Tenancy Mgmt teams. Revisions and updates to MOU form the basis of these meetings throughout the remainder of 2024.</p>
<p><b>Recommendation 5:</b> a. TCHC to track LRAs over \$10,000.00 separately so as to accurately report on the</p>	<p>a) Tracking of Local Repayment Agreements over \$10,000 will be included in the work outlined against Recommendation 2.</p>	<p>a) As per Rec 2 <b>COMPLETE</b></p>	<p>Re 5.c) feasibility of HoMES changes for PAP flexibility has been analyzed by ITS and determined that it is possible to</p>	<p>Work is underway with ITS on a detailed scoping and implementation plan for the HoMES changes for to enable PAP flexibility. Plan is expected to</p>

<sup>14</sup> Revision to timelines due to hiring delays on Manager Tenancy Management and Centralized Services role

<p>organizations total arrears balance with an understanding that recovering this debt in total is improbable.</p> <p>b. Ensure TCHC staff are empowered to broker longer repayment agreements that consider the Tenants income and expenses to prevent breaches wherever possible.</p> <p>c. Modify HoMES to allow Pre-Authorized Payments (PAP) to also withdraw arrears repayments by month; and to withdraw the rent on a flexible schedule. For example, seniors receive their pensions on the 27<sup>th</sup> of the month—this should</p>	<p>b) Guidance and parameters giving Regional Tenancy Management staff the ability to enter into longer repayment agreements will be included in the work to revise and update the ACP outlined in Recommendation 3</p> <p>c) The cost and feasibility of modifications to HoMES to allow PAPs to be set up for repayment agreements, and to allow for PAP withdrawals on a flexible schedule are unknown at this time. Staff have begun the work to explore the feasibility of the changes and will include</p>	<p>b) As per Rec 3<sup>15</sup> <b>Q2 2024</b></p> <p>c) <b>TCHC mgmt response COMPLETE as outlined. Next phase (detailed scoping) – Q3 2024</b></p>	<p>implement. Scope, timing, and costing phase is underway. Projected timelines will result from this work and be reported at the next update.</p>	<p>be finalized in by the end of Q3, 2024.</p>
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<sup>15</sup> Revision to timelines due to hiring delays on Manager Tenancy Management and Centralized Services role

<p>be the day the PAP withdraws the rent. This is particularly important as other bill collectors are able to withdraw funds on a flexible schedule resulting in returned PAPs due to Non-Sufficient Funds. For tenants who are employed and paid bi-weekly, the PAP should be flexible enough that two payments per month can be withdrawn to coincide with their employment schedule.</p>	<p>OCHE in the discussions and decision-making.</p>			
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**APPENDIX 2: PROGRESS UPDATE RECOMMENDATIONS SUMMARY JULY 1 TO DECEMBER, 2023**

<b>OCHE RECOMMENTATION</b>	<b>TCHC RESPONSE</b>	<b>PROGRESS UPDATE (2023)</b>	<b>PROGRESS UPDATE (2024)</b>
<p><b>Recommendation 1:</b> It is recommended that TCHC consider providing financial literacy workshops for Tenants in arrears and who have signed LRAs to better support their long-term success.</p>	<p>Management to explore development of partnerships, in collaboration with OCHE to have community partners deliver workshops for tenants through TCHC.</p>	<p>Q4 2024</p>	<p>Discussions with Woodgreen are underway and work is ongoing with the Programs and Partnership team to facilitate this partnership to deliver financial literacy workshops to a broader ranges of tenants in arrears.</p>
<p><b>Recommendation 2:</b> In the OCHE Bi-Annual Report January 1 to June 30, 2023, the Commissioner recommended TCHC Ensure HoMES can collect repayment amounts with the Pre-Authorized Payment (“PAP”) and withdraw payments on a flexible schedule. The progress toward implementation is described in Appendix 1 – Recommendation 5c. The results of the OCHE Breach Survey, underscores the need for this to be implemented.</p>	<p>See response 5C (above, in OCHE Q1-2 2023 Bi-annual report).</p>	<p>Q3 2024</p>	<p>See response 5C (above, in OCHE Q1-2 2023 Bi-annual report).</p>



<p><b>Recommendation 3:</b></p> <p>As part of the new ACP, TCHC has considered moving ahead with a monthly arrears payment reminder mechanism (e.g. mass text messaging). Given this, it is recommended that all Tenants with LRAs, including those brokered through the OCHE, be included in these regular reminders.</p>	<p>TCHC is considering implementation of a monthly arrears payment reminder mechanism. As this process is confirmed and implemented, TCHC we will closely monitor the effectiveness of the intervention and will include tenants with Local Repayment Agreements in phase 2 of the project.</p>	<p>Q1 2025</p>	<p>Monthly arrears payment reminder mechanism is in place (text messaging) and is being piloted with significant success in the pilot ACP portfolios. 384 new identified arrears files within the ACP pilot group received a text message reminder with the following success:</p> <ul style="list-style-type: none"> <li>- 227 Accounts Paid in Full.</li> <li>- 62 Accounts TCHC received partial payments</li> <li>- 95 accounts no payments were received.</li> </ul> <p>All tenants that remained in arrears will receive follow-up's from their TSC.</p> <p>Recommendation will be complete upon implementation of revised ACP including text messaging for early arrears cases portfolio wide in Jan 2025.</p>
<p><b>Recommendation 4:</b></p> <p>Explore the option of reviewing and/or re-negotiating LRA terms every year when the Annual Household Income and Assets Review is completed.</p>	<p>TCHC is currently underway implementing changes within the ACP and will explore inclusion of this recommended component in Phase 2 where we will be implementing additional efficiencies based on evidence collected from the first phase of implementation.</p>	<p>Q1 2025</p>	<p>Data collection to inform the inclusion of this procedural component in Phase 2 of the ACP revisions is underway. Expected update on feasibility in Q1 2025.</p>