



## Office of the Commissioner of Housing Equity's 2025 Work Plan

Item 12A

December 12, 2024

Board of Directors

**Report:** TCHC:2024-82

**To:** Board of Directors (the "Board")

**From:** Tenant Services Committee ("TSC")

**Date:** November 25, 2024

### **PURPOSE:**

To seek approval from the Board for the Office of the Commissioner of Housing Equity's ("OCHE") 2025 Work Plan.

### **RECOMMENDATIONS:**

It is recommended that the Board approve the OCHE 2025 Work Plan, as set out in Attachment 1 to this report.

### **TSC:**

The recommendation was approved by the TSC on November 25, 2024.

### **IMPLICATIONS AND RISKS:**

The OCHE provides the Board with oversight of TCHC's operations in the area of evictions for arrears. The OCHE reports bi-annually on its activities. 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.

The OCHE 2025 Work Plan serves to guide the OCHE in its focus for 2025. The review and approval of the OCHE 2025 Work Plan is central to the TSC's and the Board's oversight of the OCHE.

**SIGNATURE:**

*“Melanie Martin”*

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Melanie Martin  
Interim Commissioner of Housing Equity

**ATTACHMENT:**

1. Office of the Commissioner of Housing Equity – 2025 Work Plan

**STAFF CONTACT:**

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**Office of the Commissioner of Housing Equity (OCHE) – 2025 Work Plan**  
**Goal 1: Ensuring Successful Tenancies and Eviction Prevention**

The core work of the OCHE is eviction prevention and ensuring successful tenancies for tenants who are at risk of eviction due to arrears of rent or losses of subsidy. In January 2022, the OCHE’s mandate expanded to include all TCHC tenants who owe arrears of rent, which resulted in significant changes to the flow of referrals and workload. Since that time, the OCHE has been working with TCHC implementing strategies to manage the flow of referrals and evaluating its case management practices, to ensure that the OCHE is used as an office of last resort. In 2025, the OCHE will continue to monitor and report out on the progress of the systemic recommendations made in 2023 and 2024, as they relate to managing workflow, TCHC compliance with the Arrears Collection Process (“ACP”) and ensuring successful tenancies.

<b>OCHE Goal 1.1a</b>		
<b>Ensure successful tenancies and address underlying issues leading to arrears of rent for all tenants who remain in arrears after TCHC has completed all steps of the ACP.</b>		
<i>To Support TCHC’s Strategic Goal: Support the rights of every tenant to have reasonable enjoyment of their homes.</i>		
<b>OCHE Actions 1.1a</b>	<b>OCHE Key Performance Indicators 1.1a</b>	<b>OCHE Target 1.1a</b>
Screen files received by the OCHE from TCHC to ensure compliance with the ACP prior to accepting and assigning files to the Early Resolution Officers (“EROs”).	<ul style="list-style-type: none"> <li>All cases referred to the OCHE have an accurately completed Stage 1 Checklist and are screened to ensure TCHC has attempted to resolve the arrears before making an OCHE referral. This will also result in fewer referrals being sent back to TCHC for all reasons<sup>1</sup>.</li> </ul>	As of Q3 2024, the OCHE received 740 referrals from TCHC and sent back 151 (20%).  <b>In 2025 receive referrals from TCHC that are accurate with fewer than 15% sent back for any reason.</b>

<sup>1</sup> Reasons for files being sent back to TCHC include non-compliance with ACP, sent in error, tenant working with TCHC staff and arrears paid in full.

	<ul style="list-style-type: none"> <li>• Fewer files returned to TCHC for non-compliance with the ACP.</li> <li>• Increase TCHC front line staff capacity, through the sent back process, which will result in fewer files requiring an OCHE intervention.</li> </ul>	<p>As of Q3 2024, the OCHE sent back 151 files for all reasons and 80 (53%) of these files were returned due to non-compliance with the ACP.</p> <p><b>In 2025, reduce the number of files sent back to TCHC due to non-compliance with the ACP by 10%.</b></p> <p>As of Q3 2024, the OCHE sent back 80 files for non-compliance with the ACP and were re-referred 19 cases (24%). This means TCHC was able to manage the remaining 61 cases (76%) without the need for an OCHE intervention.</p> <p><b>In 2025, support TCHC to maintain this success rate of 75% of files returned to TCHC be resolved without the need for the OCHE.</b></p>
<b>OCHE Actions 1.1b</b>	<b>OCHE Key Performance Indicators 1.1b</b>	<b>OCHE Target 1.1b</b>
<ul style="list-style-type: none"> <li>• Promote tenant engagement in the resolution of arrears.</li> <li>• Ensure Tenants are aware of the options available to them—and that they choose the option that works best for their households.</li> </ul>	<ul style="list-style-type: none"> <li>• Tenants will actively participate in the resolution of their arrears of rent with the assistance of the ERO.</li> <li>• L1 Applications are avoided.</li> <li>• Arrears are managed.</li> </ul>	<p>As of Q3 2024, the OCHE avoided the need for an L1 Application for TCHC tenants in 80% (398/496) of cases.</p> <p><b>In 2025, avoid the need for an L1 Application in 85% of cases from TCHC by rescinding Losses of Subsidy (LOS)s, managing arrears, accessing external funding sources and engaging tenants in the resolutions.</b></p>

**OCHE Goal 1.2a**

**Continue to work with community partners through our pilot programs to support Tenants to address arrears and avoid or resolve losses of subsidy to ensure successful tenancies.**

**OCHE Action 1.2a      OCHE Key Performance Indicators 1.2a      OCHE Target 1.2a**

- **Toronto Rent Bank (TRB) Pilot:**  
Continue to work with Tenants to increase their financial literacy through budgeting exercises before entering a Local Repayment Agreement (LRA). By accessing this funding, lump sum payments will be made up front, reducing the length of LRAs or eliminating the need for one.

- Tenancies are stabilized as arrears are addressed more quickly.
- Arrears total is reduced and length of LRAs is shortened.
- Budget is completed with every tenant who is deemed eligible to apply for the TRB to ensure long term success.

From January 1 to May 31, 2024, the OCHE brokered 159 LRAs with an average arrears amount of \$8,820.64 with an average LRA length of 70 months. The TRB Pilot began on June 1, 2024. From that date to Q3, 2024, the OCHE brokered 144 LRAs. Of these, 31 LRAs, with an average arrears amount of \$5,555.34, were brokered with an up-front payment from the TRB. The average LRA length was 60 months. In 8 files, the arrears were eliminated with the up-front payment from the TRB.<sup>2</sup>

The aim is to increase the number of lump sum payments to TCHC to reduce overall arrears and the length of time it takes to collect arrears through shorter LRAs. Of note, EROs are required to provide budgeting, financial literacy and the addressing of underlying issues to ensure the stabilization of tenancies in the long run in order to qualify for this funding.

**100% of eligible tenants who are willing and eligible to participate will access the TRB to reduce the arrears total.**

<sup>2</sup> With the rollout of the new ACP 2025, and more cases arriving at OCHE sooner, there may be more accounts paid in full with funding from the TRB negating the need for an LRA completely.

<b>OCHE Action 1.2b</b>	<b>OCHE Key Performance Indicators 1.2b</b>	<b>OCHE Target 1.2b</b>
<ul style="list-style-type: none"> <li><b>WoodGreen Tax Link Service Pilot:</b> Continue to support Tenants to complete and submit Annual Household Income and Assets Reviews or ‘In-Year’ Reviews to prevent losses of subsidy or to reverse losses of subsidy which have taken effect.</li> </ul>	<ul style="list-style-type: none"> <li>Tenants’ subsidies will be reinstated, reducing the arrears balance.</li> <li>Tenants’ subsidies will not be revoked, preventing a future arrears scenario.</li> </ul>	<p>As of Q3 2024, the OCHE received 101 files with a Loss of Subsidy (LOS) or a pending LOS from TCHC and resolved the LOS in 69% (70/101) of cases. Of the 70 LOS cases, 42 (60%) were resolved using the Woodgreen Tax Link Service.</p> <p><b>In 2025 resolve the LOS/pending LOS using Woodgreen’s Tax Link Service in 80% of LOS cases.<sup>3</sup></b></p>
<p><b>OCHE Goal 1.3</b></p> <p><b>Complete outreach to Tenants in conjunction with TCHC and other community partners to support the implementation of TCHC/OCHE processes, financial literacy and access to benefits.</b></p>		
<b>OCHE Action 1.3</b>	<b>OCHE Key Performance Indicators 1.3</b>	<b>OCHE Target 1.3</b>
<ul style="list-style-type: none"> <li>In collaboration with TCHC and other community partners, the OCHE will offer Tenant engagement sessions to assist tenants to understand their rights and responsibilities as it relates to arrears of rent.</li> </ul>	<ul style="list-style-type: none"> <li>Tenants understand what is expected of them under the new 2025 ACP and be given information on the resources available to manage their arrears.</li> </ul>	<p><b>Complete 6 Tenant engagement sessions (2 in each region) to explain the 2025 ACP, educate on community-based resources and strengthen the relationship between Tenants and front-line staff to resolve issues with support from community partners directly as they arise<sup>4</sup>.</b></p>

<sup>3</sup> It is being explored to have this program expanded to TCHC, which could see a reduction in cases with a LOS or pending LOS coming to the OCHE, as they will be resolved in the Regions.

<sup>4</sup> This will also include inviting community partners such as WoodGreen, the Ontario Disability Support Program (“ODSP”) and Toronto Employment and Social Services (“TESS”).

## Goal 2: Audit Compliance with ACP and implementation of OCHE Systemic Recommendations

The OCHE Terms of Reference requires the OCHE to audit TCHC’s application of the ACP and Eviction Prevention Policies and to make systemic recommendations to TCHC based on the audit findings. In 2025, the OCHE will continue to audit the implementation of the new 2025 ACP, present the findings to TCHC and the Board of Directors, and monitor the success of the systemic recommendations made in 2023 and 2024.

### OCHE Goal 2.1

**The OCHE will work collaboratively with TCHC to continue to improve and monitor the 2025 ACP and to support with training TCHC staff with a focus on improving the client service experience, reducing evictions, and improving compliance with the ACP.**

*To Support TCHC’s Strategic Goal: Empower and support frontline leadership and employees in resolving issues and challenges locally in support of tenant needs.*

OCHE Actions 2.1	OCHE Key Performance Indicators 2.1	OCHE Target 2.1
<ul style="list-style-type: none"> <li>The OCHE will audit each file that is referred from TCHC and provide a Report to the Tenant and TCHC for each case describing the audit findings.</li> <li>The OCHE will compile audit findings and report to TCHC on a monthly basis with specific findings related to ACP compliance. This will assist TCHC to determine the success of the 2025 ACP.</li> <li>The OCHE will support TCHC in the training and mentoring of front-line staff and managers on ongoing issues related to the 2025 ACP, ensuring</li> </ul>	<ul style="list-style-type: none"> <li>TCHC will react to problems related to the implementation of the ACP in real-time. Training can be identified, along with gaps in the technology.</li> <li>Case Conferences will continue monthly and will consist of case discussions and review of processes as identified by front-line staff.</li> <li>As identified by TCHC, provide training as needed on all areas related to arrears collection and eviction prevention, including repeating training as refreshers for new staff.</li> </ul>	<p><b>To continue providing 12 monthly dashboard reports to TCHC by region and meet with the regional managers to review the Commissioner’s audit findings and recommendations and identify ACP compliance and related training gaps for quicker course correction.</b></p> <p><b>With Program Services, continue offering 12 case conferences (monthly) to all TCHC frontline staff to ensure consistent application of TCHC policies and processes.</b></p>

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<p>accountability, monitoring compliance and flagging emerging issues as identified by TCHC or through file auditing.</p>	<ul style="list-style-type: none"> <li>In 2025, the OCHE will respond to TCHC’s requests for training, with modules developed and ready within 2 months of the request being made.</li> </ul>	
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**OCHE Goal 2.2**

**Monitor the implementation and success of the 2025 ACP.**

<b>OCHE Action 2.2</b>	<b>OCHE Key Performance Indicators 2.2</b>	<b>OCHE Target 2.2</b>
<ul style="list-style-type: none"> <li>The OCHE will report to TCHC management and the Board of Directors on the audit findings comparing the outcomes of the 2021 and 2025 ACPs and this will inform future process updates or amendments.</li> </ul>	<ul style="list-style-type: none"> <li>The OCHE will provide TCHC with monthly and Bi-Annual audit finding for both the current and new ACP to support with updates, amendments or training of the new 2025 ACP as needed</li> </ul>	<p><b>Track the implementation and success of the 2025 ACP by conducting audits on 100% of files assigned to EROs.<sup>5</sup></b></p> <p><b>Report on the findings for 100% of the files where the arrears started after January 1, 2025, when the new ACP will be implemented vs. the current 2021 ACP.</b></p>

<sup>5</sup> The OCHE can only provide data on the cases referred to it, and TCHC may want to provide additional data on cases that were successfully resolved by the 2025 ACP, and did not require an OCHE intervention, in order to have a holistic picture of the effectiveness of the new 2025 ACP.



**OCHE Goal 2.3**

**Monitor and report on the progress of the OCHE systemic recommendations made in 2023 and 2024 to ensure they are all implemented and measured for success in 2025.**

**OCHE Actions 2.3**

Review the application and outcomes of the following Systemic Recommendations:

- Large Balance COVID arrears Pilot.
- ACP compliance recommendations.
- Improve the relationship between TESS and ODSP and ensure Memorandum of Understanding between TESS and TCHC is updated, and staff are aware of it.
- Modification to HOMES to allow flexibility when setting up Pre-Authorized Payments (PAP) to ensure tenants with varying pay schedules can pay the rent using PAP.
- Monitoring large balance LRAs yearly with the Annual Review.

**OCHE Key Performance Indicators 2.3**

- The OCHE systemic Recommendations made in 2023 and 2024 are completed and implemented by TCHC by the end of Q4 2024.

**OCHE Targets 2.3**

**In 2025, in collaboration with TCHC, the OCHE will determine measurable outcomes for each recommendation and provide updates to the Board once they have been implemented for 6 months, to measure the impact.**

### Goal 3: Reporting

The OCHE will report to the TCHC Board of Directors via the Tenant Services Committee through two Bi-Annual Reports. In addition to this regular reporting function, in 2025 the OCHE will present findings based on the length of the arrears accumulation, and the implementation of the new 2025 ACP.

<b>OCHE Goal 3.1</b>		
<b>Report on the OCHE's work to Board of Directors.</b>		
<i>To Support TCHC's Strategic Goal: Accountability to stakeholders.</i>		
<b>OCHE Actions 3.1a</b>	<b>OCHE Key Performance Indicators 3.1a</b>	<b>OCHE Target 3.1a</b>
<ul style="list-style-type: none"> <li>Identify and provide status updates on systemic recommendations to the Board of Directors through the OCHE Bi-Annual reports to TCHC.</li> </ul>	<ul style="list-style-type: none"> <li>Data collected from every Report and Recommendations issued for every file closed.</li> <li>Analysis provided that explains the data and makes systemic recommendations on what to do with the findings.</li> </ul>	<p><b>Complete two Bi-Annual reports to the TCHC Board through the TSC sub-committee.</b></p>
<b>OCHE Actions 3.1b</b>	<b>OCHE Key Performance Indicators 3.1b</b>	<b>OCHE Target 3.1b</b>
<ul style="list-style-type: none"> <li>Update the OCHE Report and Recommendations Templates and audit tool to reflect the new ACP and processes as the new ACP is rolled out in 2025.</li> </ul>	<ul style="list-style-type: none"> <li>Reports are more user friendly for staff and Tenants and reflect the requirements of the 2025 ACP.</li> </ul>	<p><b>Update ACP Auditing Tool and Report and Recommendations Templates by Q1 2025 to coincide with the roll out of the new 2025 ACP.</b></p>

<b>OCHE Goal 3.2</b>		
<b>Work with the City of Toronto, TCHC and the Toronto Seniors Housing Corporation (“TSHC”) on the outstanding City of Toronto Council direction <a href="#">2022.EX34.7</a>, where the City will complete a review on the function of the OCHE.</b>		
<b>OCHE Actions 3.2</b>	<b>OCHE Key Performance Indicators 3.2</b>	<b>OCHE Target 3.2</b>
<ul style="list-style-type: none"> <li>Participate in discussions and make recommendations on the OCHE work and how it is delivered.</li> </ul>	<ul style="list-style-type: none"> <li>The OCHE is able to serve the greatest number of tenants in arrears.</li> </ul>	<p><b>The ongoing function of the OCHE is determined.</b></p>
<b>OCHE Goal 3.3</b>		
<b>Review OCHE Terms of Reference to ensure they remain current.</b>		
<b>OCHE Actions 3.3</b>	<b>OCHE Key Performance Indicators 3.3</b>	<b>OCHE Target 3.3</b>
<ul style="list-style-type: none"> <li>The OCHE will revise the existing Terms of Reference in collaboration with the City of Toronto and TCHC and TSHC Board of Directors, to ensure they meet the expanded mandate, and any changes made to the OCHE model.</li> </ul>	<ul style="list-style-type: none"> <li>The work of the OCHE matches the work described in the Terms of Reference.</li> </ul>	<p><b>Terms of Reference finalized by Q4 2025.</b></p>

## Goal 4: Service to Toronto Seniors Housing Corporation

Continue to provide OCHE services to the TSHC as per the shared Service Agreement. The core work of the OCHE is eviction prevention and ensuring successful tenancies for people whose tenancies are at risk due to arrears of rent or losses of subsidy and to oversee TSHC’s compliance with its Arrears Collection Process and Eviction Prevention Policies.

<b>OCHE Goal 4.1</b>		
<b>Ensure successful tenancies and address underlying issues leading to arrears of rent for all tenants who remain in arrears after TSHC has completed all steps of the ACP.</b>		
<i>To Support TCHC’s Strategic Goal: Support the rights of every tenant to have reasonable enjoyment of their homes.</i>		
<b>OCHE Actions 4.1</b>	<b>OCHE Key Performance Indicators 4.1</b>	<b>OCHE Target 4.1</b>
<ul style="list-style-type: none"> <li>Promote tenant engagement in the resolution of arrears.</li> <li>Ensure Tenants are aware of the options available to them—and that they choose the option that works best for their households.</li> </ul>	<ul style="list-style-type: none"> <li>Tenants will actively participate in the resolution of their arrears of rent with the assistance of the ERO.</li> <li>L1 Applications are avoided.</li> <li>Arrears are managed.</li> <li><i>As per Goal 1.2, TSHC will also be included in the Community Partnership Programs.</i></li> </ul>	<p>As of the end of Q3 2024, the OCHE avoided the need for an L1 Application for TSHC tenants in 85% (127/149) of cases.</p> <p><b>The OCHE will avoid the need for an L1 Application in 90% of cases from TSHC by reversing LOS, managing arrears, accessing external funding sources and engaging tenants in the resolutions.</b></p>
<b>OCHE Goal 4.2</b>		
<b>The OCHE will work collaboratively with TSHC to continue to improve and monitor the ACP.</b>		
<b>OCHE Actions 4.2</b>	<b>OCHE Key Performance Indicators 4.2</b>	<b>OCHE Target 4.2</b>
<ul style="list-style-type: none"> <li>The OCHE will audit each file that is referred from TSHC and provide a Report to the Tenant and TSHC for each case describing the audit findings. The</li> </ul>	<ul style="list-style-type: none"> <li>TCHC will react to problems related to the implementation of the ACP in real-time. Training can be identified, along with gaps in the technology.</li> </ul>	<p><b>Continue to provide 12 monthly dashboard reports to TSHC and meet monthly with the regional managers to review the Commissioner’s audit findings and</b></p>

<p>OCHE will compile audit findings and report to TSHC on a monthly basis with specific findings related to ACP compliance.</p>		<p><b>recommendations and identify ACP compliance and related training gaps for quicker course correction.</b></p>
<p><b>OCHE Goal 4.3</b></p>		
<p><b>Report on OCHE’s work to TSHC’s Quality and Tenant Engagement (QTE) Committee and the Board of Directors.</b></p>		
<p><b>OCHE Actions 4.3</b></p>	<p><b>OCHE Key Performance Indicators 4.3</b></p>	<p><b>OCHE Target 4.3</b></p>
<ul style="list-style-type: none"> <li>Identify and provide status updates on systemic recommendations to the QTE and Board of Directors through the OCHE Bi-Annual reports to TSHC.</li> </ul>	<ul style="list-style-type: none"> <li>Data collected from every Report and Recommendations issued for every file closed.</li> <li>Analysis provided that explains the data and makes systemic recommendations on what to do with the findings.</li> </ul>	<p><b>Complete two Bi-Annual reports issued to the TSHC Board through the QTE sub-committee.</b></p>