Toronto Community Housing

Office of the Commissioner of Housing Equity's 2024 Work Plan

Item 6
November 27, 2023
Tenant Services Committee

Report:	TSC:2023-44
To:	Tenant Services Committee ("TSC")
From:	Interim Commissioner of Housing Equity
Date:	October 31, 2023

PURPOSE:
The purpose of this report is to seek approval from the Tenant Services Committee ("TSC") and the Board of Directors (the "Board") for the Office of the Commissioner of Housing Equity's ("OCHE") 2024 Work Plan.

RECOMMENDATIONS:
It is recommended that the TSC approve the OCHE 2024 Work Plan, as set out in Attachment 1 to this report, and recommend its approval by the Board.

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 2024 Work Plan serves to guide the OCHE in its focus for 2024. The review and approval of the OCHE 2024 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's 2024 Work Plan

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Office of the Commissioner of Housing Equity (OCHE) – 2024 Work Plan
Goal 1: Ensuring Successful Tenancies and Eviction Prevention

The core work of the OCHE is to fulfil the expectations outlined in the Terms of Reference for the purpose of ensuring successful tenancies for people whose tenancies are at risk due to arrears of rent or losses of subsidy. In January 2022 the OCHE's mandate expanded to include all TCHC tenants, which resulted in significant changes to the flow of referrals and workload. The OCHE spent 2023 implementing strategies to manage the flow of referrals from TCHC and evaluating its case management practices, to ensure that the OCHE is used as a last resort.

Measurable Outcomes:

OCHE Strategic Goals	OCHE Actions	OCHE Key Performance Indicators	OCHE Targets 2024	TCHC Strategic Goals
Goal 1 Ensure successful tenancies and address underlying issues leading to arrears of rent for all tenants who remain in arrears *after* TCHC or TSHC have completed all steps of the ACP.	**1.1** Manage referrals to the OCHE by supporting TCHC to utilize the Stage 1 Checklist, ensuring compliance with the ACP. Screen files received by the OCHE from TCHC and TSHC to ensure compliance with the ACP prior to accepting and assigning files to the EROs.	**1.1** 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 non-compliance with the ACP.	**1.1** As of October 15, 2023, the OCHE received 659 referrals from TCHC and sent back 193, leaving 466 cases that have been assigned to EROs to date. **The OCHE 2024 target will be to receive approximately 600 appropriate referrals from TCHC prior to making an L1 Application at the Landlord and Tenant Board and reduce the number of sent backs by 50% (approximately 100 cases depending on number of referrals).**	**Support the rights of every tenant to have reasonable enjoyment of their homes**

| | | | Fewer files returned to TCHC/TSHC for non-compliance with the ACP.

Increase TCHC front line staff capacity, through sent back process, which will result in fewer files requiring an OCHE intervention. | As of October 15, 2023, the OCHE received 203 files from TSHC and sent back 34, leaving 169 cases that have been assigned to EROs to date. **The OCHE 2024 target will be to receive approximately 150 appropriate referrals from TSHC prior to making an L1 Application at the Landlord and Tenant Board.** | |
| | **1.2**

Promote tenant engagement in the resolution of arrears. | **1.2**

Tenants will actively participate in the resolution of their arrears of rent with the assistance of the ERO.

Evictions are avoided. | **1.2**

As of October 15, 2023, the OCHE avoided eviction for TCHC tenants deemed senior and/or vulnerable in 83% (143/172) of cases. **In 2024, the OCHE will avoid eviction in 85% of cases from TCHC where the Tenant was deemed vulnerable or is a senior.**

As of October 15, 2023, the OCHE avoided evictions for tenants from the family portfolio in 80% (184/231) of cases. **This number will remain stable[1] and in** | | |

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[1] The total number of cases will remain stable or may be reduced further as more cases are resolved by front line staff from this category, as a result of the introduction and training on the enhanced N4 Checklist, which will continue to ensure that a more fulsome attempt to resolve the arrears is made by TCHC staff, including tenants on OW/ODSP, prior to referring to the OCHE.

			2024, the OCHE will resolve the need for eviction in 80%[2] of cases from the family portfolio. As of October 15, 2023, the OCHE avoided eviction for tenants in the TSHC in 90% (113/126) of cases. **In 2024 the OCHE will avoid eviction in 90% of cases (approximately 100 cases[3]) from TSHC.**	
	1.3 Support Tenants to complete and submit Annual Income and Assets Review or 'In-Year' Reviews to prevent losses of subsidy or to reverse losses of subsidy which have taken effect.	**1.3** Tenants' subsidies have been reinstated reducing the arrears balance. Tenants' subsidies were not revoked, preventing a future arrears scenario.	**1.3** As of October 15, 2023, the OCHE received 104 files with a Loss of Subsidy or a pending Loss of Subsidy from TCHC and resolved the LOS in 96% (100/104) cases. **In 2024, the OCHE will resolve the LOS/pending LOS in 95% (approximately 100 cases).** As of October 15, 2023, the OCHE received 19 files with a Loss of Subsidy or a pending loss of Subsidy from TSHC and resolved the LOS in 95% (18/19) cases. **In 2024, the OCHE will resolve the LOS/pending LOS in 95% of cases (approximately 25 cases).**	

[2] Based on the analysis of the Family portfolio conducted in 2023, it was found that tenants from the family portfolio were less likely to engage with an ERO. In addition, the OCHE resolutions from this category were straight forward and uncomplicated, and of those resolved, fewer referrals to community agencies were required, which is why this target is lower in comparison to the other categories.

[3] In mid 2023, the OCHE began screening TSHC files for ACP compliance and returning files to TSHC where appropriate. For this reason, we expect to open fewer files from TSHC in 2024.

	1.4	1.4	1.4	
	In collaboration the OCHE with City Partners and TCHC, will develop a time specific methodology for both tracking and enforcing arrears management for cases with large balances, which fall under strict criteria.	Files with large arrears balances will be tracked separately from newer arrears files. TCHC will be able to accurately determine the success of the new ACP. This tracking needs to be in place before the roll-out of the new ACP.	**Together with TCHC, implement the Pilot by Q3 2024**. The OCHE to help identify the success of the new ACP through tracking and reporting OCHE findings according to arrears start dates.	
	Broker reasonable repayment agreements that consider the Tenants' financial circumstances. With the understanding that recouping debt with large balances can take a long time.	Tenants participate in financial literacy and budgeting exercise before entering a Local Repayment Agreement (LRA) to increase success.	As of October 15, 2023, for files received from TCHC, the OCHE brokered 235 LRAs and completed budgeting and financial literacy education in 88% (208/235) of cases. Of the files that required an LRA in 2023, the goal for the ERO completing a budgeting exercise was 80% of cases. As of October 15, 2023, for files received from TSHC, the OCHE brokered 86 LRAs and completed budgeting and financial literacy education in 81% (70/86). Of the files that required an LRA in 2023, the goal for the ERO completing a budgeting exercise was 80% of cases. **In 2024, the OCHE will complete budgeting and financial literacy in 85% of cases where an LRA was brokered (approximately 200 cases).**	

Goal 2: Training

The OCHE Terms of Reference identify that there is a role for the OCHE to play in supporting TCHC to build front line capacity regarding compliance with the Arrears Collection Process (ACP) and related Eviction Prevention Policies. This is being accomplished through mentorship, case conferencing, and specific module-based training, with a focus on engagement with tenants and understanding systemic barriers faced by tenants.

Measurable Outcomes:

OCHE Strategic Goals	OCHE Actions	OCHE Key Performance Indicators	OCHE Targets 2024	TCHC Strategic Goals
Goal 2 The OCHE will work collaboratively with TCHC to continue to improve and monitor the ACP and to train staff with a focus on improving client service experience, reducing evictions, and improving compliance with the ACP.	**2.1** The OCHE will support TCHC on the roll out of the new ACP in 2024. Continue to provide training based on TCHC's emerging needs as it relates to arrears collection. Attend OPS meetings with senior managers at TCHC to problem solve and course correct as needed.	**2.1** New ACP rolled out with appropriate training and support to frontline staff, supervisors, and managers. TCHC staff continue to bring ACP questions to bi-weekly case conferences. Fewer files sent back to TCHC for non-compliance with the ACP.	**2.1** **In collaboration with TCHC, the OCHE will participate in the training of the new ACP by the end of Q2, 2024** **In 2024, the OCHE will provide 12 monthly reports to the TCHC and TSHC by region which include the Commissioner's findings and recommendations and identify ACP compliance and related training gaps for quicker course correction.**	**Empower and support frontline leadership and employees in resolving issues and challenges locally in support of tenant needs**

| | **2.2**

The OCHE will provide training materials and staff resources to support TCHC in their training goals related to the ACP and engagement with tenants. | **2.2**

Case Conferences will continue bi-weekly and will consist of case discussions and review of processes as identified by front-line staff.

As identified by TCHC, provide bi-monthly training on all areas related to arrears collection and eviction prevention, including repeating training as refreshers and for new staff. | 2.2

Using data compiled from Case Conferences throughout 2023 to inform future training for TCHC staff. **In 2024, the OCHE to continue voluntary bi-weekly case conferencing with front line staff.**

6 training sessions delivered by OCHE staff. Training specific effectiveness measures to be identified in partnership with TCHC in advance of each training session and will be tracked throughout the year.

OCHE to recommend future staff training that should be developed and provided by L&OD. (Gaps identified by questions posed in training and case conferences). | |

Goal 3: Reporting

The OCHE will report to the TCHC Board of Directors via the Tenant Services Committee through two Bi-Annual Reports and to the TSHC Board of Directors via the Quality and Tenant Engagement Committee through two Bi-Annual Reports. In addition to this regular reporting function, in 2024 the OCHE will present findings based on the length of the arrears accumulation, and the implementation of the new ACP.

Measurable Outcomes:

OCHE Strategic Goals	OCHE Actions	OCHE Key Performance Indicators	OCHE Targets 2024	TCHC Strategic Goals
Goal 3 Report on OCHE's work to TCHC, TSHC and the respective Board of Directors.	**3.1** Identify and provide status updates on systemic recommendations to the Board of Directors through the OCHE Bi-Annual reports to TCHC and TSHC.	**3.1** Data collected from every Report and Recommendations issued for every file closed. Analysis provided that explains the data and makes systemic recommendations on what to do with the findings.	**3.1** **Two Bi-Annual reports issued to the TCHC Board through the TSC sub-committee.** **Two Bi-Annual reports issued to the TSHC Board through the QTE sub-committee.**	**Develop a business intelligence foundation that enables timely decision making and identifies tenant service success measures**

		3.2	3.2	3.2	
		Report to TCHC and TSHC on a monthly basis with specific findings related to ACP compliance. This will assist TCHC to determine the success of the new ACP.	TCHC and TSHC are able to react to problems related to the implementation of the ACP in real-time. Training can be identified, along with gaps in the technology.	**Dashboard implemented by Q1 2024 to support TCHC and TSHC Regional Managers to monitor compliance with the ACP.** **Training developed and implemented that reflects the findings of these reports as well as real needs identified by staff and managers.**	
		Update the OCHE Report and Recommendations Templates to reflect the new ACP and processes as they evolve in 2024.	Reports are more user friendly for staff and Tenants.	**Updated by Q2 2024 to coincide with the roll out of the new ACP.**	
		3.3 With TCHC senior management, TSHC senior management and the Boards of Directors, finalize the OCHE Terms of Reference to reflect the expanded mandate.	**3.3** The work of the OCHE matches the work described in the Terms of Reference.	**3.3** **Terms of Reference finalized by Q3 2024.**	

Goal 4: Systems

Since its inception in 2014, the OCHE has relied on manual tracking of data using Excel spreadsheets. With the increase in referrals resulting from the mandate expansion, and the shift to empower the regions to do more of the work to resolve the arrears, it is imperative that the OCHE be embedded in the HoMES systems for efficiency.

Measurable Outcomes:

OCHE Strategic Goals	OCHE Actions	OCHE Key Performance Indicators	OCHE Targets 2024	TCHC Strategic Goals
Goal 4 Work with TCHC to create, test, and utilize the HoMES system for all OCHE work.	**4.1** Work with TCHC to embed the Stage 1 Checklist into HoMES and to provide the OCHE access to it. This will eliminate the extra time needed to send referrals to the OCHE and for the OCHE to screen files and send them back to TCHC.	**4.1** Referrals are streamlined, time management is improved as manual referral and send back processes are eliminated.	**4.1** **The OCHE and TCHC and TSHC will send and receive referrals via the HoMES system by the end of Q1 2024.**	**Transform the way we work through the implementation of effective and efficient tenant service processes, systems and tools**
	4.2 Work with TCHC to create, test, implement the necessary modifications to HoMES to allow the OCHE to use the HoMES system for all case management and reporting.	**4.2** Elimination of manual data entry and extraction which is time consuming and more likely to result in errors.	**4.2** **By the end of Q3 2024, the OCHE will eliminate the use of manual data collection and conduct all work-related functions using HoMES.**	