

April 19, 2021

**The Honourable Ahmed Hussen, P.C., M.P.**  
Minister of Families, Children and Social Development  
House of Commons  
Ottawa, Ontario K1A 0A6

Dear Minister,

COVID-19 has reminded us how a safe and secure home is essential for all Canadians. We also acknowledge your efforts to make housing central to any social and economic recovery plans. We believe we need to keep the momentum going to address historic housing and homelessness challenges.

The Fall Economic Statement 2020 recognized how COVID-19 has exacerbated existing affordability and homelessness issues. This is particularly true for women, Black, Indigenous, and other racialized communities, the LGBTQ2 community and people living with disabilities. The National Housing Strategy Act clearly stipulates that adequate housing is a basic human right. To live up to our human rights obligations, urgent action must be taken with a focus on social housing to ensure that everyone in Canada has access to adequate, accessible housing and where affordability means that they are not forced to live unsustainably in relation to their income.

### **1. For Indigenous, By Indigenous National Housing Strategy**

**Adequately resourced Urban and Rural Indigenous Housing and Homelessness Strategy that is developed and implemented by urban, rural and Northern Indigenous peoples and housing and service providers.**

Indigenous peoples are dramatically over-represented among people experiencing homelessness in Canada and are 11 times more likely to use an emergency shelter. In a recent report, the Parliamentary Budget Officer identified 124,000 Indigenous households in housing need, including 37,500 who are homeless each year.

Sustainable investments at a scale commensurate with need are required and need to be budgeted towards an Indigenous-led strategy to address the disparities in housing conditions in urban, rural and northern settings. This includes the creation of a properly funded For Indigenous, By Indigenous National Housing Center with the central aim of eliminating the gap in core housing need between Indigenous and non-Indigenous families and individuals.

### **2. Rapid Housing Initiative**

**Significantly expand the Rapid Housing Initiative with yearly funding.**

While the 3,000 units envisioned by the Rapid Housing Initiative is a good step forward, the program requires significant expansion for the government to meet its commitment of ending homelessness. We are therefore calling for a significant expansion of the Rapid Housing Initiative by allocating \$7 billion for

no less than 24,000 units over the next 2-3 years. The Federal government must further ensure that operating costs from these projects are also supported which will lower the barrier of entry and quickly stimulate more projects to ensure the rapid housing of our most vulnerable.

We also note that many provinces did not receive any dedicated funding allocation through the cities stream under the RHI and communities in these very same provinces are also at a disadvantage due to their smaller size and consequently have less resources available to compete for the remaining limited funding pool. With the proposed expansion of the RHI, the federal government must ensure a much broader pan-Canadian distribution of projects, better application support as well as funding allocated to northern and rural projects, and a dedicated allocation for urban, rural and northern Indigenous housing projects.

### **3. Acquisition of Rental Housing Assets**

#### **Create a housing acquisition fund to purchase existing rental assets and stop the financialization of housing in Canada.**

While the new Rapid Housing Initiative supports acquisition, it applies only to non-residential properties and precludes using funds to purchase existing rental assets. REITs and large capital funds have been thriving throughout the pandemic and acquiring housing before community housing providers have time to go through the application process of existing programs and the erosion of our housing stock continues in full force. It is estimated that for every new affordable housing unit created, 15 existing units were lost.

To address this issue, the government must implement an acquisition stream with financing and grant options into the National Housing Strategy that would support cooperative and non-profit housing providers in acquiring these properties. Measures also need to be taken to stop the financialization of housing by preventing institutional investors or capital funds from swooping to purchase these housing assets to turn a profit. Its also imperative to ensure a rapid application process so that the asset can be acquired before being lost to REITs and large capital funds.

### **4. New Construction**

#### **Immediately commit to building 370,000 units of accessible community housing.**

Non-market, non-profit housing development needs to be prioritized and greatly accelerated. We urge you to immediately commit to building at least 370,000 units of community housing that use a universal design which accommodate people with disabilities, with at least 73,000 units dedicated to Indigenous households living in urban, rural and northern communities. Investments in community housing are central to any effective response to the housing crisis and Canada's economic recovery. The expansion in new development, is critical to simultaneously combat the connected problems of shelter poverty and wealth segregation.

Permanently affordable and supportive housing units are necessary to address Canada's housing and homelessness crisis. As such, new construction programs must also be designed to ensure deep affordability for a portion of these units through deep grants and be aligned with current rental assistance

initiatives. The non-profit housing sector is well positioned to drive efficient and effective housing solutions that will address affordability challenges for Canadians, while providing critical economic stimulus for the country in the midst of a public health emergency and economic recession. The community housing model is also proven to be a sound public investment by providing long-term affordability.

## **5. Government surplus lands**

### **Adopt a housing first policy for government surplus lands.**

The non-profit and co-operative housing sector has long advocated for the release of surplus public land to build affordable housing. Across Canada, land costs are often the single biggest factor in improving the economics of affordable housing development.

Given the extreme shortage of affordable housing and the high cost of land, surplus public lands in locations that are well-suited for residential development should be prioritized for affordable housing. Investment should be increased as many communities have surplus lands; this must be matched with an expedited process for identifying federal land opportunities. Partnering with the co-op and non-profit sectors to help deliver this housing can ensure that surplus lands provide the greatest public good. This partnership has the potential to catalyze the development of thousands of permanently affordable homes across the country.

## **6. Supportive wraparound services and rent-geared-to-income**

### **Partner with all levels of government and non-profit housing providers with direct federal investments in supportive wraparound services.**

Wraparound services are essential to any strategy that truly envisions an end to homelessness. We are calling for the creation of a Homeless Housing Benefit (HHB) to help a minimum of 55,000 people avoid or exit homelessness. This funding would be dedicated to prioritizing the most vulnerable in rapidly locating and subsidizing permanent supportive non-profit housing that addresses individual needs. An intersectional lens must be applied to throughout the government's approach to housing, it is absolutely critical that wraparound services are also culturally appropriate and tailored to supporting women, Black, Indigenous, and other racialized communities, the LGBTQ2 community and people living with disabilities. The Recovery for All report proposes an initial investment of \$50 million annually towards a HHB rising to \$290 million as the benefit ramps up the number of homeless persons served.

Further to this, the gap in social housing options geared to income has grown to alarming levels over the decades that followed 1993 when the federal government stepped away from its role in providing rent subsidies to low income residents. While the recently announced Canada Housing Benefit agreements is a step in the right direction, we note that they were planned and budgeted under the National Housing Strategy's previous goal of reducing homelessness by only 50% over 10 years and it is insufficient to meet current needs. It is also important to point out that not all communities are eligible under current rental assistance programs. We are calling on the Federal government to re-initiate operating subsidies to non-

profit housing providers in addition to current partnerships with municipal, provincial, territorial, and Indigenous governments.

## **7. Reinstate Rental Assistance for Co-ops and Non-Profit Housing Providers**

**Provide long-term stable access to rental assistance for all co-operatives, including those established under the Urban Native Housing Program.**

The Federal Community Housing Initiative (FCHI) was purposefully designed to maintain rental assistance for community housing providers exiting their operating agreements. However, 7,500 co-operative households and many more non-profit housing providers were arbitrarily excluded from this program because of the date of their operating agreement. Equally disturbing is the fact that co-ops with operating agreements established under what CMHC then called the Urban Native Housing Program are also excluded from continued rent assistance.

While the government has recently provided up to 12 months of funding, stable and predictable long-term funding is essential to the operations of community housing providers. Rent assistance should be maintained for all housing providers who exit these federal operating agreements as a measure of continued federal support for a robust community housing sector. We encourage the federal government to expand rental assistance to all low-income families living in co-operatives and non-profits, not just those that meet the FCHI eligibility criteria. We also encourage the government to commit to FCHI renewal well before its scheduled sunset in 2028.

## **8. Reaching Home**

**Increase and make permanent federal investments in community-based homelessness responses, such as Reaching Home.**

Reaching home has demonstrated to be a strong community-focused funding program, however, it remains one of the smaller programs under the National Housing Strategy. We are therefore calling for an additional \$282 million annually to be allocated under Reaching Home for the next 7 years. The government must ensure prioritization of housing investments to people experiencing – and at greatest risk of experiencing – homelessness and women fleeing violence, with a focus on Indigenous peoples, and provide ongoing, predictable funding for this funding stream.

## **9. Meaningfully implement the right to housing in Canada**

**National leadership on eviction standards and a Federal Retroactive Residential Tenant Support Benefit.**

Canadians are struggling with significant income loss due to the pandemic. Even with the CERB or CRB, many are unable to afford rent. Their debt load in rent arrears is staggering and many Canadians are at risk of losing their home as provinces have lifted their temporary eviction bans. This is especially acute in large cities where CERB/CRB do not go as far for covering rent on top of other basic necessities. The pandemic has disproportionately affected women, Black, Indigenous, and other racialized communities,

the LGBTQ2 community and people living with disabilities. In turn, they are particularly vulnerable to the eviction crisis. In order to meaningfully enforce the national right to housing, we are calling for national leadership on eviction standards which ensure that access to supports to remedy the situation and other suitable housing options geared to income are immediately available.

The evictions crisis also demonstrates a dire need for a program to provide financial support for those who are struggling to pay rent throughout the pandemic, and we are therefore calling for the creation of a federal retroactive residential tenant support benefit.

## **10. Accountability Measures**

### **Timeline and disaggregated Data.**

We must resolve inequities and systemic breakdowns that contribute to homelessness and housing need. We are glad to see the government announce membership of the National Housing Council in November 2020. However, we continue to ask you respect the National Housing Strategy Act and appoint those with lived experiences as well as experience in human rights.

Moreover, a clear timeline to achieve the commitment to end homelessness must be provided and independent accountability measures with public reporting of progress must be available and accessible. The appointment of the federal housing advocate is necessary and central to advancing the right to housing. Additionally, human rights oversight and accountability must be ensured in development and implementing pandemic recovery plans including the involvement of persons with lived experience and communities directly affected.

Recovery initiatives over the next few years are crucial. The impacts of these initiatives and broader housing programs must be actively monitored by collecting and publishing disaggregated housing data in a way that looks to address intersectional gaps to housing, the need for wraparound services, and ensure housing programs are reaching the most vulnerable populations. This includes cross-sectional lens on gender, ethnicity, mental health and other socio-economic factors leading to precarious housing and experiences of homelessness, and a further deep dive into the unique challenges contributing to the housing crisis among the diversity of First Nations, Métis and Inuit communities across Canada. In addition, the Federal government must undertake to publicly review how legislation and government policies perpetuate these inequities.

## **11. Capacity Building**

### **Provide funding stream to help build capacity in the community.**

To help build capacity in the community, there must be recognition that there are severe inequities within the system. Often smaller organizations, rural communities and gendered or racialized communities have far less resources to compete and apply for government funding, while the private sector has demonstrated to be much more able to dedicate full-time staff to the application process. The government must ensure that the application processes under the National Housing Strategy are as straightforward as possible, and that CMHC increases its outreach efforts and provide support staff

throughout the application process for housing providers with less resources and underserved communities. Longer and more complex application processes have also put several projects at risk when they are not able to secure funding in an expeditious manner to meet deadlines.

In closing, the pandemic has demonstrated how quickly a government can move in certain areas when faced with something that is truly treated as a crisis. While progress has been made, we note that up until this past fall the federal government's intent was to reduce homelessness by only 50% over 10 years, which failed to meaningfully implement housing as a right.

While we are heartened that the government has since turned to use stronger language around the elimination of homelessness, that language must be followed by concrete programs to address the new targets, as well as any additional gaps created by the pandemic, and to finally address the long-standing lack of an Indigenous housing strategy. Bold and aggressive action is needed to ensure the right to housing, recognized in the National Housing Strategy Act, is meaningfully enforced so that the entire spectrum of housing needs is met. It is therefore imperative for the Federal Government to act swiftly on the 11 recommendations above.

Signed,

Aboriginal Coalition to End Homelessness  
Aboriginal Council of Winnipeg  
Aboriginal Housing Management Association  
Accessible Housing Network  
Affordable Housing Societies  
Alliance to End Homelessness Ottawa  
Association of Neighbourhood Houses of BC  
BC Non-Profit Housing Association  
BC Society of Transition Houses  
Bloom Group Community Services Society  
Bloom Group Nicholson Housing Society  
Brightside Community Homes Foundation  
Campbell River and District Coalition to End Homelessness  
Citizens for Public Justice  
Comox Valley Coalition to End Homelessness  
Co-operative Housing Federation of BC  
Corporation Waskahegen  
Dawn to Dawn Action on Homelessness Society  
End Homelessness Winnipeg  
Fédération des locataires d'habitations à loyer modique du Québec  
First United Church Community Ministry Society  
First United Church Social Housing Society  
Front d'action populaire en réaménagement urbain  
Keepers of the Circle  
Kekinow Native Housing Society



ABORIGINAL HOUSING  
MANAGEMENT ASSOCIATION



Lookout Housing and Health Society  
Metro Vancouver and Fraser Valley Council of Community Homelessness Tables  
Namerind Housing Corporation  
Native People of Thunder Bay Development Corporation  
New Chelsea Society  
Ontario Council of Agencies Serving Immigrants  
PEI Fight for Affordable Housing  
Yukon Anti-Poverty Coalition  
PHS Community Services Society  
Resource Assistance for Youth, Inc.  
Toronto Alliance to End Homelessness  
Skigin-Elnoog Housing Corp  
Vernon Native Housing Society  
Wachiay Friendship Centre  
Women's Habitat of Etobicoke  
YWCA Canada