

A re-balanced SHRA accountability framework — leading to enhanced outcomes for social housing residents

CHF Canada's Ontario Region is concerned that a key policy direction in the Affordable Housing Strategy will be to define a relatively narrow set of provincial interests that need to be protected in an amended *Social Housing Reform Act* and then give municipal service managers significantly greater latitude to make policy and operational decisions about the co-op and non-profit housing that they administer. This risks creating an even more fractured system of social housing in Ontario with uneven standards and rights for social housing residents and applicants and a further shift in the balance of power from the community to government.

There is the very real prospect that the changes being contemplated as part of the Affordable Housing Strategy would leave housing co-ops worse off than they are now, reducing them increasingly to operating more as agents of the municipality than as independent, member-led communities. After years of pressing for reform to move things in quite the opposite direction this would be unacceptable to the co-op housing sector as it would accelerate the erosion of member control and commitment to contribute that underpin the success of the co-op housing model.

We understand that another key goal of the Long-Term Affordable Housing Strategy (in addition to giving service managers more control) will be to improve outcomes for residents of social housing. Successive program evaluations by Canada Mortgage and Housing Corporation, including the most recent one in 2003, have found that housing co-ops provide a platform for residents to develop many new skills, acquire organizational experience and gain employment. Residents in co-ops report an improved sense of community, better relations with friends and neighbours and improved social supports compared to other forms of non-profit housing. **These outcomes result directly from the control that co-op members have over the important decisions about their community and their ability to shape their environment.**

Any move by the Province to shift more control of decisions from co-op members to government would undermine, and over time, eliminate these positive outcomes for co-op members and conflict fundamentally with its goal of improving the lives of social housing residents. To help achieve that goal, **the Affordable Housing Strategy should explicitly recognize the contribution that co-op housing makes to improving outcomes for its members and commit to ensuring that member control (which is essential to achieving these outcomes) is enhanced, not eroded.**

While there are certainly areas where greater service manager flexibility would be appropriate and beneficial, at the heart of SHRA reform should be a rebalancing of the accountability framework to deliver the benefits inherent in the community housing model. Key changes to the SHRA to achieve a better balancing of accountability should include the following:

- **an explicit recommitment to a community-based model** with amendments to SHRA rules to recognize that co-op and non-profit boards have the lead responsibility for the success of their housing communities and to give them more latitude to make meaningful decisions about their housing. This policy direction should be grounded in a strong and clear statement of purpose in the SHRA to replace the one that now speaks only of efficient and effective administration by service managers. A commitment to delivering social housing that meets the needs of, and empowers, social housing applicants and residents and is under the control of the housing provider should be added.
- **separation of operating and RGI funding in the accountability framework** with rules about oversight and authority that reflect the purpose and amount of funding associated with each. Program accountability rules should recognize that residents contribute most of the funding now and that, over time, operating funding is reduced and that many providers will receive no operating funding at all at a certain point. Many receive none now. When a co-op or non-profit receives no operating funding, the service manager's authority under the SHRA should be reduced to reflect the lack of public funding. If additional funding is provided subsequently by the service manager for capital repairs or other needs, appropriate service manager authority would be reintroduced.
- **a robust provincial framework** that ensures equitable rights and benefits to applicants and social housing residents across the province and defines the key parameters of how the program will work, including funding levels, exercise of remedies, etc.. The provincial framework should also include an enhanced Ministerial Consent process related to exercise of remedies by service managers to ensure that the fundamental purposes of the Act are respected as service managers administer the program across the province.
- **a process for independent review of service manager decisions under the SHRA** that does not require co-ops and non-profits to go to court to challenge a decision that may be outside the service manager's authority to make. The lack of any way for co-ops and non-profits to hold service managers to account for the way they exercise their authority under the SHRA is a fundamental gap in the accountability framework in the SHRA.