

January 14, 2004

Ms. Toni Farley
Director
Ministry of Municipal Affairs and Housing
Social Housing Branch
777 Bay St., 2nd Floor
Toronto, Ont.
M5G 2E5

Re: Amendments to *SHRA* Regulations

Dear Ms. Farley:

On behalf of a working group of representatives from the Ontario Regions Social Housing Group, CHFC – Ontario Region and ONPHA, I am enclosing a list of recommended changes to the *SHRA* Regulations. As you will see, most of the suggestions relate to the Part V Regulation, RGI and Access.

This document reflects a consensus among the participants, representing a broad spectrum of stakeholders, both service managers and providers. Where the matters concern access, we have also included the network of coordinated access centres in our discussions and recommendations. We believe it is very important that the Government respect this consensus by implementing the changes as soon as possible. (In some cases, we offer new wording to sections of the regulations in the hope that this will speed the process of implementing the changes we suggest.)

In putting forward this list of suggestions, I would like to make a number of points.

First of all, we acknowledge the various compilations of suggestions from stakeholders that the Ministry published in 2003. Since our group did not agree with all of these suggestions, we would like MMAH to focus on making the changes we have suggested in our consensus document and not make any changes mentioned in the compilation that are not reflected in our document.

Secondly, I must draw your attention in particular to our suggested changes to the regulations governing the granting of special priority status on waiting lists. We do not mean to minimize the importance of responding to domestic violence and protecting the safety of victims of abuse, but we are concerned that the current provisions in the regulations force service managers and housing providers to attempt solutions to a problem that is much wider than access to housing.

Thirdly, we would like to nominate one or two representatives from our group, and also a lawyer if you wish, to work with your staff on the wording of the amendments before such wording goes to Cabinet.

Finally, in putting forward this list of suggestions we do not preclude the need for a wider discussion of more fundamental changes to the *Act*. As you know, many stakeholders have had grave concerns about the *Act* ever since First Reading. Now that the governing party has changed we believe there is an opportunity to discuss with you whether or not the *SHRA* as it stands reflects the core political values of the new Government.

In view of the points I have made above, I would like to suggest that you arrange a meeting with me and a few representatives of our group to discuss the quickest and most effective way to proceed. Please call me at your earliest convenience to arrange this meeting.

We have reviewed the recommendations of the Advocacy Centre for Tenants Ontario (ACTO) and found many points of agreement between our positions. I will shortly forward to you a note on that matter to facilitate your own analysis.

In closing, I would like to thank you and your staff for your openness in working with the stakeholders and inviting feedback on the regulations in the past several months. We were very much encouraged by this collaborative approach and we hope this collaboration will continue.

Sincerely

Keith Ward
Commissioner of Housing and Property
and General Manager, Peel Living

PC/si