



Co-operative Housing Federation of Canada
Fédération de l'habitation coopérative du Canada

Ontario Region / Région de l'Ontario

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March 28, 2003

Toni Farley
Director, Social Housing Branch
2nd Floor, 777 Bay Street
Toronto, Ontario
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Dear Ms Farley,

Thank you for the opportunity to provide further input on the Ministry's initiative to improve the regulations to the *Social Housing Reform Act*. We have reviewed the summary of input from service managers and attach detailed comments. We are pleased about the extent of consensus amongst service managers, providers and sector organizations on the kinds of changes needed. Most service managers have delegated the administration of the RGI program to providers. They understand that the regulatory framework must be less cumbersome and more suited to the management systems and resources of community based housing.

In general, we support those recommendations which:

- bring flexibility to the current rigid rules
- encourage fair and respectful treatment of RGI applicants and households
- strengthen the right of providers to exercise judgment and discretion in sensitive areas of operations which directly affect the health of their communities
- acknowledge and build on the history of good management and experience in community based housing in Ontario.

We believe that the majority of the recommendations from service managers reflect these interests

CHF Ontario Region rejects those recommendations which:

- add administrative complexity to the regulations
- tighten the RGI eligibility rules, and create a more punitive and insecure environment for RGI households
- further undermine the autonomy of providers
- promote the integration of RGI subsidy with social assistance programs

We strongly endorse the set of recommendations forwarded to the Ministry by the Regional CAOs in October 2002. We submitted additional recommendations for change in a separate paper on October 25 2003. We attach a copy of that paper.

CHF Ontario Region looks forward to the opportunity for further consultation before the recommendations for change are finalized. We trust that the Ministry will follow through on its plan to set up one or more working groups of stakeholders to provide more detailed advice as the regulations are drafted. Please let us know what the next steps will be and how we can take part.

Yours truly,

Original signed by

Dale Reagan
Managing Director
Ontario Region

c.c. Michael Fenn, Deputy Minister
Ed Sajecki, Assistant Deputy Minister

Attached:

- Comments on *Summary of Input from Service Managers: January 31 2003*
- Improving the Program Rules under the Social Housing Reform Act: October 25 2002