

# Issues with MyAccesstoHousingTO

*MyAccesstoHousingTO doesn't "open doors to stable housing," it closes them:*

*It is a program to reduce the number of people on the wait list, not a program to facilitate access to housing.*

## OVERVIEW

MyAccesstoHousingTO is a "mobile-enabled, fully online, choice-based process," for people who are low-income and vulnerable and disproportionately experience [digital exclusion](#). Applicants and potential applicants who do not have access to a smart phone or computer with access to the internet for long periods of time, who are technologically illiterate or who have limited technological literacy, who have disabilities, who can't read English, are all at high risk of being unable to access subsidized housing through this system, as accommodations have not been made to address the many barriers that moving to this new system creates for many in need of subsidized housing and little has been done to address the new demands that this new system is placing on a range of already under resourced service providers.

When the Choice-based system was piloted in 2014, the vacant RGI units on offer could be accessed online through the Housing Connections website and as handouts available through various community agencies; applicants who were interested in a unit could indicate their interest (or authorize a support worker to do so on their behalf) through a variety of channels while the posting was active; and support and information about the process was available in-person and online. ([p.8](#)). With the pilot, "specific accommodations and outreach efforts are being made by staff to ensure that vulnerable households, including individuals experiencing homelessness, are able to participate and benefit from the program."

**None of these accommodations, however, have been incorporated into the design of MyAccesstoHousingTO.** Even with these accommodations, most Pilot participants felt strongly that not having access to a computer and not having adequate computer skills disadvantaged applicants in the choice-based process; staff were particularly concerned about how heavily applicants relied on them to navigate the program, especially clients experiencing language difficulties, mental health issues, and addictions, who weren't able to fully engage with the program, and often didn't participate long term. ([p.31](#))

The implication for applicants is that they will have a *far* greater reliance on supports (staff and technological resources) to be able to access housing through this new system, while service providers are being asked to meet this far greater need using the same resources (funding, staff, and technology) that were in place for the old system. As a result, the current system is exacerbating existing inequities and will inevitably result in those who are in the greatest need of subsidized housing—the most vulnerable and least privileged—being at a significant disadvantage and many will never get on the waitlist to begin with, will get on the wait list but never access housing, or will be removed from the waitlist without accessing housing. For Special Priority Applicants, this is an urgent issue, as any delay in accessing the new system and participating in the choice-based process means that they will have to spend longer than necessary in a homeless shelter, sleeping outside, or in an unsafe living situation.

The new system and its implementation is an example of economic discrimination of low-income people, as it creates new barriers that prevent marginalized people from accessing public services; it is inconsistent with the first working principle of Toronto's Digital Infrastructure Plan, [adopted by City Council on Jan. 29, 2020](#), that "Digital infrastructure will be used to create and sustain equity, inclusion, accessibility and human rights in its operations and outcomes. Digital Infrastructure will be flexible, adaptable, interoperable and responsive to the needs of all Torontonians, including equity-seeking groups, Indigenous people, those with accessibility needs and vulnerable populations;" and it violates Torontonians' Right to Housing, specifically "All residents have a right to equal treatment with respect to housing, without discrimination contrary to the Ontario Human Rights Code and to protection against arbitrary requirements that result in discrimination based on membership in groups protected by the Code or on homelessness or housing status." It must therefore be fixed immediately.

## DETAILS

### 1. Problem: Technological barriers

People without access to technology, without technological literacy, and/or who experience other barriers (language, ability) aren't able to access, engage with, or participate in the new system on their own. To access housing and avoid being removed from the wait list, someone else will need to do the following on their behalf: set up an email account, register an application in the portal, upload eligibility documents each year, receive and respond to messages, participate in the choice-based cycles, and follow up with notifications and housing offers received through the system.

People who have limited access to technology and little or no technological literacy and can't currently access the system, could engage with and participate in the system if provided with support to learn the necessary skills and the resources to enable them to access the online system, but this support isn't being provided.

- What's needed:
  - Low-tech/alternate methods to ensure people without access to tech or who don't have tech literacy have equal access to access/engage with all components of the system.
  - Adequately resourced low-barrier, and appropriate resources and supports for those without access to technology or who have no technological literacy so that they can access and participate in the system effectively enough to maintain their place on the wait list and access housing
  - Checks and balances to ensure that those experiencing barriers don't lose their opportunity to access housing or get removed from the list as a result of the barriers (like making sure they are connected with the resources they need (staff and technological) to access/engage with the system and acquire housing)
  - Ongoing monitoring and evaluation to make sure that the system is adequately serving the needs of those in need of housing and gaps are quickly identified and addressed

### 2. Problem: Inadequate resourcing of support services

Organizations identified as those that will be providing the support for this program, including Housing Help Centres, City-run shelter Housing Workers, and librarians, do not have the resources/supports needed to adequately provide the necessary support: in-person walk-in access to computers, phone, internet and adequate staffing. Service providers (especially those not explicitly identified as providing support for this program, like drop-ins) are being overwhelmed by people looking for support in transitioning to the new system and don't have the staff, time, or technological resources needed to adequately assist people. Only organizations with service contracts with SSHA are being properly trained to help clients; other organizations just receive "information sessions." Result: people aren't getting the help they need to access housing and the quality of other services provided by these organizations is being negatively impacted. <sup>1</sup>

- SSHA response:
  - Gave grants to Housing Help Centres to help them buy technology and fund a staff position for each Housing Help Centre for referrals and phone calls. COVID has made it difficult to make the technology accessible: most Housing Help Centres aren't providing in-person service, and staff absenteeism is high.
  - Staff of City run shelters who were supporting clients through the old system have been trained on the choice-based process and have access to Rent Cafe, so that they can log in and support clients

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<sup>1</sup> As the literature points out, support services are an important part of ensuring a choice-based rental model is effective and equitable, but they are often the weakest part of the wait list management system (Marsh et. al, 2004). If adequate support is not provided, there is a risk that the responsibility for assistance and education of the waiting list system will be offloaded from Housing Connections to community social service providers. These service providers may become overburdened with housing, taking them away from their primary purposes of rehabilitation, mental health, addictions and daily living supports. Furthermore, those in need of supports to successfully use the choice-based rental model may fall by the wayside without receiving housing if there are no supports available. Sometimes, vulnerable groups do not have structured or easily identified support organizations and this contributes to their plight in accessing a proactive wait list system (Marsh et. al, 2004). [P.33](#)

- Many agencies that already have contracts with the City to do case management have back-end access to the Rent Cafe database to go in and look up applications and upload documents for clients instead of having to do this with clients
  - Looking into "bidding on behalf of" case management approach. They have the functionality in the system for this by they are still exploring how it would work and if agencies would even be interested in doing it. Privacy and consent are big issues. COVID and COVID redeployment has put this exploration on hold.
  - Shelter residents who would be invited to participate in choice based process are being prioritized: they are giving shelters short lists of applicants and asking shelters to direct residents to someone in the shelter who can help them register; this individual reach out is having an impact
- Response to SSHA:
    - There are only 7 Housing Help Centres, and each got .5 of a housing coordinator and .5 of a rent bank coordinator, \$15,000 in tech funding, which isn't adequate. The only Housing Help Centre that is open for in-person visits is Woodgreen.
    - This system is much more involved than the paper based system, yet no additional funding or support has been provided to housing workers at shelters to meet the increased demands of the new system (like providing the one-on-one support necessary to help people through the choiced based cycle every two weeks) or address COVID-related staff shortages
    - Thousands of homeless people aren't in City-run shelters and are inadequately supported
    - There are many organizations that provide support to people with housing applications, where that is not their primary job function (librarians, drop-in workers, community health centre staff, etc), and the increased demands on them has not been considered
- What's still needed:
    - "Bidding on behalf of" and/or case management support (allowing workers and other parties to receive notifications, engage with the system, and participate on the applicant's behalf) needs to be an easily accessible option for people who need this support: it needs to be rolled out city-wide and can't be left to organizations to volunteer to participate.
    - Organizations need to be properly trained and compensated for taking the additional responsibilities and work involved in supporting this new system; with City-funded organizations, service agreements should be renegotiated and these responsibilities should be added and funded
    - In-person and phone support services/positions specifically to help people access and navigate the system, provide follow up support to address problems with applications, provide long-term support with engaging with the system and participating in the choice-based housing cycle. Ideally, new positions would be created for staff who function like real estate agents do for people in search of market housing: they should work one-on-one with people to help them find housing within the public housing system.
    - Provide tutorials and one-on-one help for applicants to learn how to use a computer, navigate the internet, set up an email account, access the portal, submit an application, upload documents, and participate in the choice-based process
    - Housing Help Centres are currently working together to outline a model of support that is required to support the new system. This model will include more technology (computers and phones) for people who can do it themselves, computers and training for people who could do it themselves if they had training, and staff to provide one-on-one support for people who need that help. Each Housing Help Centre has different staffing levels currently. Woodgreen estimates they will need 2 more staff to support this program.

### 3. Problem: Inadequate Call Centre support:

Calling the Central Application Centre line for assistance can result in 1-2 hour waits for assistance, tying up service providers' phone lines, and the call-back system malfunctions, resulting in applicants unable to access the help they need.

- SSHA's response:
  - They are experiencing faster uptake than anticipated, which is creating pressure: majority of calls are about applications. Wait times were very long in October and November, but wait times have been subsiding.
  - They have provided more funding to increase staff on RGI lines. Majority of those positions are open and full. This is helping.
  - A direct line has been set up for the Choice Based process, recognizing they will have a lot of calls about expressing interest in vacancies and there is more urgency to these calls than applications.
  
- Response to SSHA and what's still needed:
  - It is urgent that special priority applicants are registered with the new system
  - Callers shouldn't have to wait longer than 5 minutes for service: service level standards should reflect this
  - Careful monitoring is required to ensure call volumes and wait times aren't subsiding as a result of people being frustrated and giving up, but as a result of people successfully registering for the new wait list

### 4. Problem: Encourages bidding fatigue:

Every choice-based cycle involves applicants having to review and research each unit offered to them to determine whether the unit meets their needs, a time consuming process that must be done using a computer with internet access, and then indicate interest in the units which they are interested in living in. This process could take multiple days if the applicant wishes to visit the building and neighbourhood in person before committing interest in the unit. After indicating their interest in available units, the applicant must wait to see if they are chosen from the 1000-2000 other applicants who are competing for the same units. Applicants aren't told where they are on the waitlist, yet applicants are chosen based on where they are on the waitlist. Applicants near the bottom of the list of those invited to participate in the choice based process will likely be required to participate in many cycles before being offered a unit. Frequent disappointment after investing the time and effort in travelling to access support, working with a worker to research each unit and then selecting units will likely cause many to give up.

Research has shown that such a system "may be detrimental to disadvantaged households (Pawson & Watkins, 2007) who will simply be unable to remain active in the choice-based system because of the demands it places on them financially (time away from work), emotionally (experiences of rejection, fatigue), and intellectually (low levels of education, literacy, and language proficiency). Medical issues, addictions, and mental health troubles will also affect a household's ability to continue to bid and advocate for themselves. It should be noted that "not all vulnerable groups have a representative organisation to provide support" (Marsh et. al, 2004, p.13) so it is possible that there are many households that would go under the radar without receiving assistance. Furthermore, because vulnerable groups often do not have access to crucial information to make informed choices (such as quality of neighbourhood, schools, amenities, etc.), the most vulnerable are more likely to end up with the most easily-accessible units (those in least demand) in a less desirable neighbourhood (Brown & King, 2005). This concern is shared by the existing distribution waiting list – the choice-based wait list does not remove the likelihood of vulnerable households being placed in the least desirable neighbourhoods." [pp. 23-24](#)

- What's needed:
  - Interested applicants should be matched with a case worker who participates in the choice-based cycle on their behalf and works to find them appropriate housing after a

comprehensive interview and assessment to determine the applicants' needs and preferences, with the final decision made by the applicant.

## **5. Rollout Problem: Notification through letter mail:**

Applicants already on the list are being mailed notices to register for the new system, but many will never receive this notice because they no longer access or receive mail at the address they listed many years earlier when they first applied for the waitlist. There has been no publicity to let people know that if they're on the old list, they need to transition to a new list or they will no longer be on the wait list for subsidized housing, and to call the Access to Housing number if they have not received a notice about this through the mail.

- SSHA's response:
  - They can check applicants with a DA Code to see if that person is connected to a specific program or service and contact that service to let them know that the applicant needs to transition to the new list; staff can call people at alternate numbers if they weren't able to reach the applicant through a service provider
- What's needed:
  - A public awareness campaign that applicants must transition to the new wait list to maintain their spot on the list. Information about deadlines/what happens if people don't sign up to new system must be included.
  - The City should try reaching people who have not transitioned to the new list through all contacts provided: mail, phone, and reaching out to alternate contact person.

## **6. Rollout Problem: Applicants on old wait list are responsible for uploading documents again to new system:**

Applicants already on the list are required to re-submit status documents and Notices of Assessment, which is unnecessary and puts a significant burden on applicants and service providers, as this often requires additional referrals/visits to tax and ID clinics and long waits to receive documents, increasing the chance that the registration for the new wait list won't be completed.

- SSHA response:
  - Due to a technical issue, the City is able to automate the transfer process at this time: to migrate documents to Rent Cafe, they have to be done one by one; they are looking into automating the process, but they aren't there yet
  - They can move documents over for priority clients, and on a case by case basis
- Response to SSHA and what's needed:
  - Something should be implemented to give people easy access to the option of having their documents transferred for them. For example, if a person starts a new registration and doesn't complete this section right away, then someone follows up with them to offer to transfer their documents for them.

## **7. Monitoring and evaluation**

A rigorous monitoring and evaluation process is required to make sure that people are able to participate in this system and access subsidized housing and are not excluded due to vulnerability, language difficulty, access to information, poverty or lack of technological literacy. Patterns of participation in the choice based cycle and the characteristics of successful and unsuccessful bidders should be analysed to answer the following questions so that the new system and its implementation can be evaluated for how well it is working for different vulnerable and priority groups:

- What are the characteristics of households on the old wait list, by household type, age, ethnicity,

vulnerability/special priority category and current housing circumstances (tenant, homeless etc.)?

- What are the characteristics of households who a) have successfully transferred to the new list, b) are participating in choice-based cycles, and c) are successful in securing a housing offer?
- How many people on the new list who are homeless are participating in the choice-based cycle after being invited to participate?
- How many choice-based cycles do households participate in without accessing housing before they stop participating, and what are the household's characteristics?
- What are the characteristics of households who a) have not successfully transferred to the new list, and b) are not participating in the choice-based process?
- Which households are receiving support to a) transition to the new system, and b) assist their participation in the choice-based process? What type of support are they receiving and from whom?
- Which households are accessing THHAP subsidies?
- Which households are accessing COHB subsidies?
- What is the success rate of Black and Indigenous people in accessing housing through the choice-based process?
- How easy is it to apply for subsidized housing through the new system vs the old system? Calculate the number of new applications received and the number completed in the new system, as a percentage of Toronto's Core Housing Need, compared with the numbers received/completed in previous years. ("In 2012, Housing Connections received over 23,000 total applications for RGI assistance. On average, Housing Connections receives between 50 and 70 new waiting list applications per business day.)

<https://www.toronto.ca/legdocs/mmis/2013/cd/bgrd/backgroundfile-56535.pdf> p.20"

Set service quality standards and evaluate:

- Ratio of housing workers to shelter users
- Evaluate how well Housing Workers in City-run shelters are able to support people with this new system with existing resources. Track: how long people are in shelters before they meet with a Housing Worker, track how much time a person gets with a housing worker on initial registration and on participating in choice based process. Track the digital access available in each shelter. Track how often Rent Cafe is accessed.

Targets:

- If this new system is successful, then a greater percentage of people in shelter system should be on the new waitlist vs the old waitlist and 100% of shelter residents on the old wait list should be transferred to the new list.

## APPENDIX

The old wait list was evaluated against these seven “critical success factors” and found to be lacking. Unfortunately, the new system does not currently meet any of the seven standards of success either.

### Critical Success Factors for the Housing Access System

A set of seven critical success factors for the housing access system have been developed. These success factors have framed the questions about the performance of the current system to be answered through the review. The following provides an overview of these critical success factors and some preliminary findings based on the data analysis, service process review, and consultations completed to date. These questions will continue be explored further in phase two of the review.

