

Subject: In-situ Priority

Effective Date: March 01, 2019

Replaces: n/a

Applicable to The policy and procedures contained in this document apply to the following: (**NOTE:** This incorporates Social Housing and affordable housing as determined by the Service Manager)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Co-operatives | <input checked="" type="checkbox"/> Peel Access to Housing (PATH) |
| <input checked="" type="checkbox"/> Federal Non-Profit
*incl. OCHAP/RS | <input type="checkbox"/> Rent Supplement
*incl. CSHP |
| <input checked="" type="checkbox"/> Municipal & Private Non-Profit | |

Content This document contains the following:

Legislation
Background
Objectives
Responsibilities
Request Process
Eligibility Criteria
Cessation of In-situ Priority Status
Procedures
Housing Providers
Housing Providers – Auditor Reporting Requirements
Housing Specialists
Peel Access to Housing Integrated Wait List Workers (PATH IWLW)
Questions

- Legislation**
- [Housing Services Act, 2011, S.O. 2011, c. 6, Sched. 1. s. 42-50, 53.](#)
 - [O. Reg. 367/11, s. 23-41, 59\(1\).](#) RGI Eligibility.
 - [O. Reg. 367/11, s. 42.](#) Occupancy Standards.
 - [O. Reg. 367/11, s. 45-46, 48, 50, 52\(3\).](#) Selection System.

NOTE: *The amended In-situ Priority policy meets the requirements of section 48 of the HSA O. Reg. 367/11 selection system, that allows a housing provider, with the Service Manager's approval including determination of priority, to select a household from the centralized wait list (CWL) that already occupies a unit with the housing provider to receive rent-geared-to-income (RGI) assistance.*

Background

The In-situ Priority was removed in December 2015 as it did not meet the original intent of the policy and due to its complicated process. However, with the current housing market condition, finding affordable housing has become a challenge for market rent households living in social or affordable housing in Peel. This trend, coupled with tenants losing their subsidies, has resulted in zero vacancy or low turnover rates and generated rent-geared-to-income (RGI) subsidy surplus for housing providers in the Region of Peel (ROP). To address issues related to these challenges, the Service Manager revisited the In-situ Priority policy and conducted a process review where issues that lead to its removal were reassessed and addressed. The review, which included benchmarking, resulted in an amended In-situ Priority policy that outlines the following:

- clear objectives
- well-defined responsibilities
- streamlined request process
- specific eligibility criteria
- easy to follow procedures

The **effective date** of this policy is March 1, 2019. Acceptance of requests for an In-situ Priority will commence on March 1, 2019.

Objectives

The In-situ Priority policy has been revised to include the following three (3) objectives:

- **Tenants**
To provide RGI assistance to market rent households who;
 - are currently residing in Social and Affordable housing units (as determined by the Service Manager), and
 - have recently experienced an involuntary permanent loss of household income that has affected their ability to pay market rent.
 - **Housing Providers**
To assist housing providers who do not have vacant units or have low turnover rates, meet their RGI target level and ensure that subsidies are administered accordingly.
-

- **Service Manager**
To support one of Region of Peel's [Housing and Homelessness Plan \(2018-2028\)](#) short term outcomes which is to increase successful tenancies, maintain housing and prevent eviction.

Responsibilities

The table below highlights the In-situ Priority process key players and their responsibilities (please note that this is not a comprehensive list):

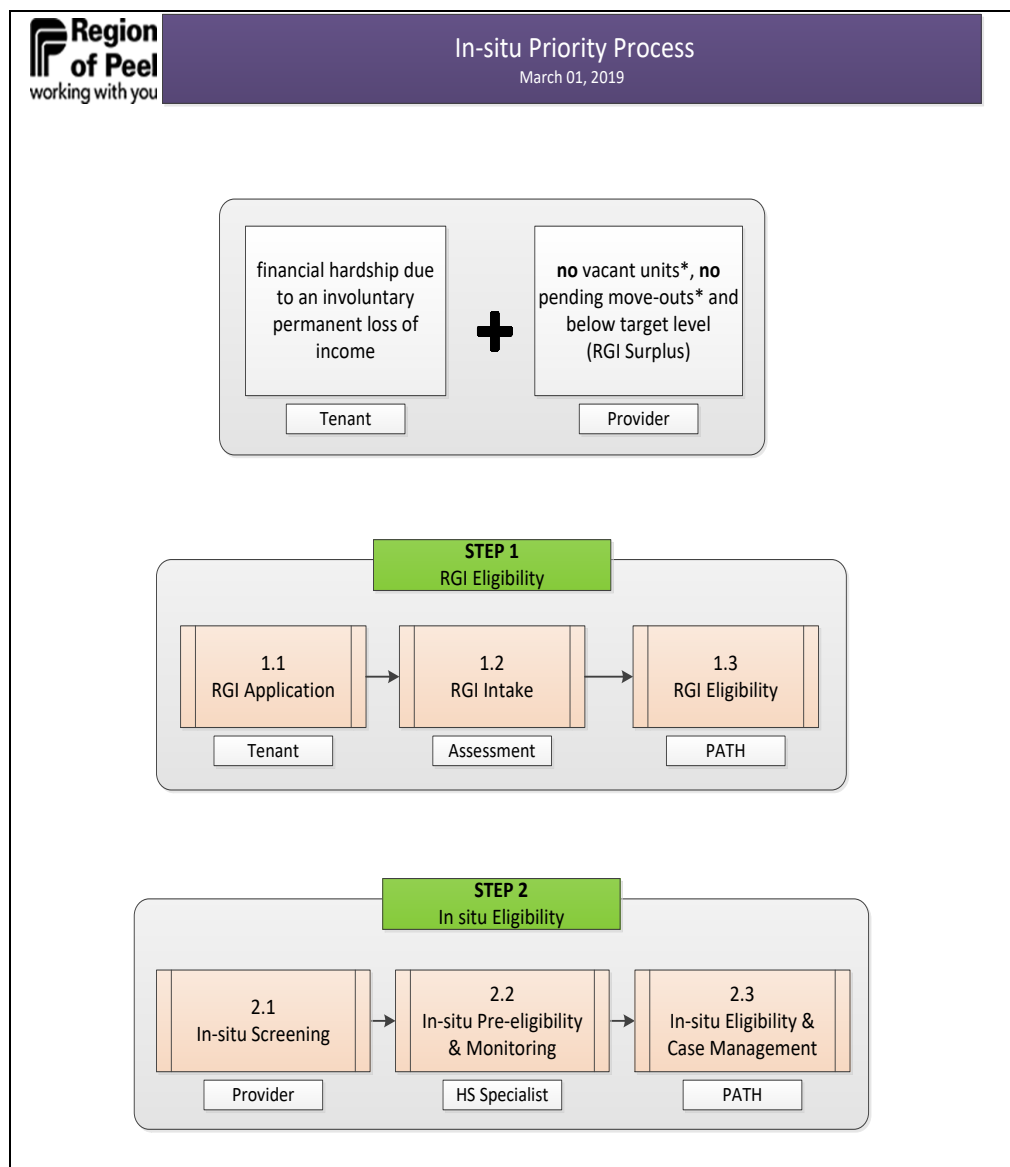
WHO	WHAT
Tenants	Application: <ul style="list-style-type: none"> • must have an active Peel Access to Housing (PATH) file on the Centralized Wait List (CWL) before requesting the In-situ priority • must provide proof/supporting documents as required
Housing Providers	Screening: <ul style="list-style-type: none"> • must refer household to PATH and ensure that they are on the CWL with an active PATH file before completing the In-situ Priority Request form • must complete the following with the household: <ul style="list-style-type: none"> ○ confirmation of active PATH file number ○ review the In-situ Priority policy ○ In-situ Priority Request form ○ Income and assets verification review
Service Manager – Housing Supply Specialists	Pre-eligibility and Monitoring: <ul style="list-style-type: none"> • must review the In-situ Priority Request form • must assess housing providers' target levels • must refer In-situ Priority requests to PATH for approval/denial • must advise PATH and providers that RGI subsidy is available
Assessment Unit – Assessment Workers	Intake and Assessment: <ul style="list-style-type: none"> • must input PATH applications • must complete RGI pre-eligibility assessment

<p>PATH – Integrated Wait List Workers</p>	<p>Eligibility Determination:</p> <ul style="list-style-type: none"> • must determine RGI eligibility • must determine In-situ Priority eligibility • must be responsible for CWL case management
--	---

Request Process

Refer to the flowchart below for the In-situ Priority process:

NOTE: **In-situ may be approved if the number of available RGI subsidies exceeds the number of vacant units and pending move-outs.*



Eligibility Criteria

To receive RGI subsidy in the current unit, the 16 eligibility criteria below must be met:

Household Eligibility Criteria <i>(Household refers to all its members or an individual living alone)</i>							
<input type="checkbox"/>	<p>1. Household must meet the RGI eligibility criteria in their current unit under O. Reg. 367/11, s. 24-41, including the following provisions:</p> <ul style="list-style-type: none"> i. households' waiting list income after loss must not exceed the market rent in their current unit (must take into consideration income from all sources) ii. an active PATH file must be in place before requesting for an In-situ Priority status <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">If the household is...</th> <th style="text-align: left;">Then the household...</th> </tr> </thead> <tbody> <tr> <td>not on the active CWL</td> <td>must apply to PATH and be found eligible</td> </tr> <tr> <td>on the active CWL prior to the loss of income</td> <td> must update existing PATH file to reflect current situation Important: <i>Household must have one (1) active PATH file only. Household must consent and choose between being on the CWL without the priority or with the In-situ Priority; not both. Should they pick the In-situ Priority, previous building selections must be replaced with only their current housing provider's building.</i> </td> </tr> </tbody> </table>	If the household is...	Then the household...	not on the active CWL	must apply to PATH and be found eligible	on the active CWL prior to the loss of income	must update existing PATH file to reflect current situation Important: <i>Household must have one (1) active PATH file only. Household must consent and choose between being on the CWL without the priority or with the In-situ Priority; not both. Should they pick the In-situ Priority, previous building selections must be replaced with only their current housing provider's building.</i>
If the household is...	Then the household...						
not on the active CWL	must apply to PATH and be found eligible						
on the active CWL prior to the loss of income	must update existing PATH file to reflect current situation Important: <i>Household must have one (1) active PATH file only. Household must consent and choose between being on the CWL without the priority or with the In-situ Priority; not both. Should they pick the In-situ Priority, previous building selections must be replaced with only their current housing provider's building.</i>						
<input type="checkbox"/>	<p>2. Household must be currently living in a Social housing or affordable housing (as determined by the Service Manager) in Peel</p>						
<input type="checkbox"/>	<p>3. Household must be currently living in an appropriate sized unit for the household as per current Occupancy Standards under O. Reg. 367/11, s. 42.</p> <p>Important: <i>Overhoused tenants are not eligible to apply for the In-situ Priority.</i></p>						
<input type="checkbox"/>	<p>4. Household must not have prior subsidy violations or subsidy loss due to non-compliance</p>						
<input type="checkbox"/>	<p>5. Household must have good rental paying history prior to the loss of income</p>						
<input type="checkbox"/>	<p>6. Household must be an income contributing leaseholder/member with the same housing provider for a minimum of one (1) year prior to the loss of income</p>						

<input type="checkbox"/>	7. Household's income loss must be involuntary and permanent
<input type="checkbox"/>	8. Household's involuntary and permanent loss of income must be due to at least one (1) of the following four (4) reasons only : household has; <input type="checkbox"/> suffered permanent disability and is on long-term disability, or <input type="checkbox"/> been hospitalized (palliative), or <input type="checkbox"/> been admitted into a long-term care, or <input type="checkbox"/> passed away Important: Both the remaining household member(s) and the member who meets at least one (1) of the four (4) reasons, must meet eligibility criteria #6.
<input type="checkbox"/>	9. Household must complete the request and report the loss of income within six (6) months of the loss, provided that the household meets eligibility criteria #6 Important: The In-situ Priority wait list date is the date that the priority status has been approved.
<input type="checkbox"/>	10. Household must provide proof of income, before and after the loss, for all household members (i.e. ROE, WSIB, insurance confirmation, LTC/doctor/medical admission letter, death certificate, bank statements, etc. – refer to Income and Assets Verification – Required Documents for details)
<input type="checkbox"/>	11. Household must report any changes to their current situation and keep their PATH file up-to-date
<input type="checkbox"/>	12. Household must agree that once the offer is accepted, they will no longer be on the wait list and is considered “housed” in Peel
Housing Provider Criteria	
<input type="checkbox"/>	13. Housing Provider must have zero (0) vacancy and zero (0) pending move-outs NOTE: Subsidy may be approved if the number of available RGI subsidies exceeds the number of vacant units and pending move-outs.
<input type="checkbox"/>	14. Housing Provider must be below RGI target level (subsidy surplus)
<input type="checkbox"/>	15. Housing Provider may be over RGI target level if Provider and Service Manager have an agreement to go over target
<input type="checkbox"/>	16. Housing Provider must offer RGI subsidy only upon receipt of approval from the Housing Supply Specialist

Cessation of In-situ Priority Status

The household ceases to be eligible for the In-situ Priority status if **after** the approval, the household;

- moved out of the unit (includes internal transfers and moving to another provider)
 - Important:** *In-situ Priority status is specific to the unit. If household moves out of the approved unit, the In-situ priority will no longer apply, and the priority status is removed from the PATH file.*
- income changed, and waiting list income now exceeds the market rent in their current unit
 - Important:** *Must take into consideration new and additional income sources including income of household members added to the file after the approval of priority status.*
- family composition changed, and they are now deemed Overhoused
- consented to be removed from or **not** be added to the In-situ priority wait list
- no longer meets the RGI eligibility criteria (see [Eligibility Criteria](#) #1)

Housing Providers - Procedure

To conduct the In-situ Priority Screening, Housing Providers must complete the following steps:

Step	Action	
1	Ensure that household has an active PATH application on the centralized wait list (CWL)	
	If the household...	Then...
	does not have an active PATH application on the CWL	<ul style="list-style-type: none"> • do not complete the In-situ Priority Request form • advise to apply to PATH as per current application process
	has a PATH application	<ul style="list-style-type: none"> • call the ROP Client Contact Centre (CCC) to confirm that the PATH file is active • record the PATH File number on the In-situ Priority Request form <p>Important: <i>To protect households' private information, household must be present to answer security questions. No information will be given to unauthorized 3rd parties.</i></p>

2	Review the In-situ Priority policy and ensure that household understands the eligibility and ineligibility criteria
3	Complete the In-situ Priority Request Form Important: <i>Ensure that household understands that the request form is not a confirmation of approval.</i>
4	Complete an Income and assets verification review Important: <i>Housing providers must conduct another review if offer of RGI subsidy is not immediate</i>
5	Sort (package) documents as follows: <ul style="list-style-type: none"> • completed In-situ Priority Request Form • confirmation of income and assets verification review • proof and supporting documents
6	Retain a copy of the package and send one copy via one of the following methods: <ul style="list-style-type: none"> • Mail: Attention: Housing Supply Supervisor <i>[insert name]</i> Address: 10 Peel Centre Drive, Ste. B, 5th Floor, Brampton, ON L6T 4B9 RE: In-situ Priority Request • Fax: Attention: Housing Supply Supervisor <i>[insert name]</i> RE: In-situ Priority Request Fax number: 905-453-5002

Housing Providers – Auditor Reporting Requirements

To report In-situ Rental Charges, Housing Providers must advise auditors to report as per below:

Rental Charges						Fiscal Year	Prepare current and previous fiscal year separately
	Gross Rental Charges	Allocated Subsidy	Internal Subsidy	Vacancy Loss	Net Rental Charges		
1	Market Units						lines 1&2 must equal to AIR line# 502
2	Rent Supplement Units						
3	Geared-to-income Units						lines 3&4 must equal to AIR line# 501
4	IN SITU Units						
	Other Type1 (specify)						
	Other Type2 (specify)						

Housing Specialists - Procedure

To conduct the In-situ Priority Pre-eligibility Review/Monitoring, Housing Specialists must complete the following steps:

NOTE: *This is an overview of Housing Specialists' process.*

Step	Action						
1	Review applicable forms, requirements and documents						
	<table border="1"> <thead> <tr> <th>If the package is...</th> <th>Then...</th> </tr> </thead> <tbody> <tr> <td>complete</td> <td>proceed to the next step.</td> </tr> <tr> <td>not complete</td> <td> <ul style="list-style-type: none"> contact the housing provider, and proceed to step 2 once package is complete </td> </tr> </tbody> </table>	If the package is...	Then...	complete	proceed to the next step.	not complete	<ul style="list-style-type: none"> contact the housing provider, and proceed to step 2 once package is complete
	If the package is...	Then...					
complete	proceed to the next step.						
not complete	<ul style="list-style-type: none"> contact the housing provider, and proceed to step 2 once package is complete 						
2	Review the housing provider's RGI subsidy target level and vacancies						
	<table border="1"> <thead> <tr> <th>If subsidy is...</th> <th>Then...</th> </tr> </thead> <tbody> <tr> <td>available and no vacant units or no pending move-outs</td> <td>notify PATH that the housing provider meets the criteria</td> </tr> <tr> <td>not available</td> <td> <ul style="list-style-type: none"> notify the provider discuss target levels and explore options proceed to the next step. </td> </tr> </tbody> </table>	If subsidy is...	Then...	available and no vacant units or no pending move-outs	notify PATH that the housing provider meets the criteria	not available	<ul style="list-style-type: none"> notify the provider discuss target levels and explore options proceed to the next step.
	If subsidy is...	Then...					
available and no vacant units or no pending move-outs	notify PATH that the housing provider meets the criteria						
not available	<ul style="list-style-type: none"> notify the provider discuss target levels and explore options proceed to the next step. 						
3	Continue to monitor target levels and vacancies						
	<table border="1"> <thead> <tr> <th>If subsidy...</th> <th>Then...</th> </tr> </thead> <tbody> <tr> <td>becomes available</td> <td> <ul style="list-style-type: none"> contact the provider advise to conduct another income and assets verification review, if applicable repeat steps 1-2 </td> </tr> <tr> <td>is not available</td> <td>continue to monitor target levels</td> </tr> </tbody> </table>	If subsidy...	Then...	becomes available	<ul style="list-style-type: none"> contact the provider advise to conduct another income and assets verification review, if applicable repeat steps 1-2 	is not available	continue to monitor target levels
	If subsidy...	Then...					
becomes available	<ul style="list-style-type: none"> contact the provider advise to conduct another income and assets verification review, if applicable repeat steps 1-2 						
is not available	continue to monitor target levels						

PATH IWLWs - Procedure

To conduct the In-situ Priority Eligibility Review/Case Management, PATH IWLWs must complete the following steps:

NOTE: *This is an overview of PATH IWLWs' process.*

Step	Action
1	Review the In-situ Priority package
2	Notify that household is eligible/ineligible

	If household is...	Then...
	ineligible	<ul style="list-style-type: none"> notify household via In-situ Priority Ineligible letter email the Housing Supply Specialist
	eligible <i>(the In-situ Priority wait list date is the approved date)</i>	<ul style="list-style-type: none"> email the Housing Supply Specialist proceed to the next step
3	Continue with the CWL case management	
	If ...	Then...
	confirmation is received from the Housing Supply Specialist that RGI subsidy is available	Inactivate the file using reason "Housed RGI in Peel In-situ"
	no confirmation is received	continue with CWL case management

Questions

If you have any questions or extenuating circumstances, please contact your Housing Supply Specialist.

