



"The London Homeless Coalition exists to advise, shape, and coordinate the community's responses to homelessness and related needs for the London area."

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**Submissions and Recommendations to The Honourable Monte Solberg, PC MP,
Minister of Human Resources and Social Development,
on the December 19, 2006 HRSDC announcement of
new homelessness and housing funding commencing April 1, 2007.**

Tuesday, January 23, 2007

The London Homeless Coalition ("LHC") applauds the significant outlay promised by this Government in the December 19, 2006 HRSDC announcement of new homelessness and housing funding commencing April 1, 2007.

The Coalition draws the Minister's attention to London's effective and dynamic use of the NHI-SCPI funds, and the excellent, cooperative working relationships here in this City: municipal and federal staff, elected officials from all three levels of government (and from all parties), frontline service agencies, aboriginal groups, academics, companies and business organizations, and private individuals are all members of LHC and have contributed to the cost-effective, high-result use of funds in London.

LHC wishes to make our position clear on specific policy points from the announcement, and to make some suggestions and recommendations.

1. The LHC applauds HRSDC's desire to consult with stakeholders from the private and non-profit sectors: both the Coalition and its constituent members very much wish to be a part of any consultation processes, and offer their services. It is our understanding that London will be a "consulted community", and we welcome this.
2. The LHC fully supports the efforts of HRSDC to partner with the Province of Ontario, and welcomes and encourages increased participation and funding by the Province.

3. The LHC strongly supports the housing-first approach, agreeing that first step is to house individuals. Afterwards, other supports can be instituted as required to improve health, parenting, education, and employment. Moreover, those other supports are more effective in both the short and long terms if applied in a “housing first” context.
4. LHC strongly approves of the proposed greater access to support networks (such as in substance abuse or mental health areas) appropriate to meet individuals’ need of help to attain self-sufficiency and full participation. This fits LHC’s mission and efforts to maintain and increase integration and cooperation among clients, agencies and governments. The LHC specifically applauds:
 - 4.1 the proposed horizontal pilot projects and collaborative work (federal interdepartmental coordination, corrections, mental health, family violence, and immigration, *etc.*); and
 - 4.2 the strategic coordination of federal capital investments with other federal, provincial and territorial investments in health, training and social services.
5. Related to the foregoing: LHC strongly recommends federal consultation and coordination with municipal authorities, including both elected officials and City staff. Their knowledge of the situations and requirements and their experience with direct service provision make such coordination indispensable.
6. LHC welcomes the proposals to track progress in the prevention and reduction of homelessness:
 - 6.1 reliable and user-friendly software systems which can provide both client service and usable reporting and research data;
 - 6.2 research, integration and coalition work.These tasks are of crucial importance: if funding is limited to direct service providers then analyzing, understanding and solving the problem becomes impossible; responses become fragmented, not fully understood or planned, and “siloed”. LHC strongly encourages that the government continue with – and expand -- funding of such research and tracking efforts. Thus, the LHC supports the concept of the new Homelessness Accountability Network (HAN), but:
 - 6.3 seeks further information on how this would operate;

- 6.4 requires that “accountability” as a concept and in practice apply not only to funded projects but to the governmental and administrative processes as well.
7. The LHC fully supports the Government’s desire not only to focus on the currently homeless but also on those who are at risk of homelessness, including (but not limited to) the CMHC renovations mentioned below and programs which will help improve the living conditions for some 38,000 low-income people including seniors, persons with disabilities, victims of family violence and Aboriginal peoples.
8. Funds may flow to rural and smaller communities with the goal of solving some of the homelessness problem at a source (*ie*: rural and outlying areas) instead of just letting it flow to the cities. LHC strongly recommends:
- 8.1 the identification of smaller “feeder communities” (*ie*: those which have inadequate housing and shelter resources and which as a result have a net outflow of homeless people to large centres);
- 8.2 the direction of effective funds to minimize this “feeder” effect;
- 8.3 the withholding of funds from jurisdictions which permit their homelessness problem to be solved by others via encouraging this “feeder” effect.
- By way of example, the LHC draws to the Minister's attention to Elgin-Middlesex-London, (Joe Preston, MP), a largely rural riding which also incorporates the small city of St. Thomas, approximately twenty minutes from London. St. Thomas has no shelter for men and so directs its homeless male population to shelters in London. Such a situation places both financial and emotional stress on the City of London, its citizens and the vulnerable homeless men of St. Thomas.
9. Specifically targeted funding for transitional and supportive housing is an excellent “upstream” problem-solving emphasis, and one supported by LHC. We encourage early response and integration with other health and services disciplines.
10. The LHC supports and encourages the Surplus Federal Real Property for Homelessness Initiative (SFRPHI) and offers to participate in any surplus federal property process here in the London area.

11. LHC notes that while the Homelessness Partnering Strategy will take effect April 1, 2007, there is no commitment to having programs “good to go” on that date. We strongly recommend that:
 - 11.1 The allocations and guidelines be provided no later than Friday, February 2, 2007.
 - 11.2 Applications can be accepted by HRSDC / Service Canada commencing Monday, February 5, 2007.
 - 11.3 Applications must be completely processed through the local approvals process no later than two (2) weeks from date of receipt at Service Canada.
 - 11.4 All intervening levels of review must be complete and the matter passed up to Ministerial level for approval within one (1) week of completion of local processing.
 - 11.5 Ministerial approval must be complete within two (2) weeks of date of receipt from the review level.
 - 11.6 Funding must begin to flow to the agencies within one (1) week of Ministerial approval.
 - 11.7 The past practice of permitting “slippage” of many months between the commencement of the process and the provision of funds must cease.

LHC notes for this new Minister the long lag times between contract submission and commencement of funding: we have seen instances of funding not arriving until three-quarters of the way through the fiscal year in question. This is obviously wholly unacceptable to a public demanding governmental efficiency and imposes a cruel delay on the provision of services to those who need them most. Moreover, it has the added liability of adding more administrative cost to the system as the funds which were prevented from being spent have to be reallocated for subsequent financial years, new proposals written, and so forth. Far too much staff time and money is wasted in wholly unnecessary budgeting and administrative matters, time and money better spent on solving the problem.

12. One of the biggest failings of the SCPI-NHI program was the excessive layers of review between the local office at one end and Ministerial approval on the other. This had a number of unacceptable side-effects: it prevented funds from being used in a speedy way; it added long delays between the beginning of the fiscal year and the approval and/or commencement of proposals; and it drained funds away from service provision and into the federal bureaucracy. Almost all of the layers of review between local offices and the Minister added no benefit, provided no audit or fiscal responsibility security and increased costs. Moreover, they wholly lacked transparency: at times there was no way of knowing where an application was in the system: put bluntly, they frequently tended to disappear for

ludicrously long periods of time after leaving the local and arriving at the Ministerial level.

Accountability for delay was entirely lacking. This was exacerbated by frequent demands for contract re-writes, adding unnecessary delays and expenses. There is no excuse – and no public mandate for – “spending a buck and a half to spend a buck”. The LHC therefore strongly recommends:

- 12.1 A clear, easily understood and user-friendly template for applications, eliminating the bureaucratic subjectivity within the system which contributed only confusion and delay and eliminating the requirements for multiple re-writes.
 - 12.2 The elimination of most of the layers of review. (Many of the aforementioned re-writes often originated above local and below Ministerial levels, and had nothing to do with the substance of the contract.)
 - 12.3 Increased transparency throughout the application process.
 - 12.4 The reduction of governmental administrative costs to only a small portion of the allocated funds.
 - 12.5 The minimization of administrative complexity: it is crucial to avoid multiple “administrative pieces” between and within governments. All this does is to siphon off funds to administration instead of services.
13. The HRSDC Backgrounder mentions three housing trusts for the provinces and territories to invest in affordable housing. The LHC seeks further details on these trusts and cannot take a position on them until then. LHC requests that it be a part of the consultative and planning process for such trusts.
14. The LHC approves of multi-year and overlapping funding envelopes, as they remove much year-to-year uncertainty. The LHC does not agree, however, that funding must be matched from other sources. The LHC supports matching funding and integration of funding from other sources, where available, but not a matching requirement.
- 14.1 Such matching requirements can and has led to long delays between governments over terms and conditions of the matching funding.
 - 14.2 The intergovernmental coordination requires thus adds unnecessary expense, and would be directly at odds with the shared intent of the LHC and federal government to reduce administrative costs in the provision of services.

15. The LHC is increasingly active in partnerships with Aboriginal groups, and strongly supports efforts to meet their acute and unique needs in both urban and rural areas.
16. The LHC fully supports the funding for the CMHC renovation programs: the RRAP programs; the Shelter Enhancement Program (SEP), the Emergency Repair Program (ERP), the Emergency Repair Program (ERP) and the Home Adaptations for Seniors' Independence (HASI) Program.
17. The LHC has a profound concern about quantum. The Homelessness Partnering Strategy announcement has provided approximately a quarter-billion dollars, an amount roughly comparable to the NHI-SCPI program provided under the previous Government. The problem arises in the spread of the funds. The new programs extend funding out over a wider range of communities, meaning that those communities with serious pre-existing housing and homelessness problems must, necessarily, be receiving less funds. LHC does not feel this to be wise or effective, especially given the increasing gravity of the problem.

We thank the Minister and his staff for taking the time to review these Submissions and Recommendations.

A handwritten signature in cursive script that reads "Dick Rastin".

Dick Rastin
Chair,
London Homeless Coalition