



National Housing Strategy Team
Canada Mortgage and Housing Corporation (CMHC)
700 Montreal Rd
Ottawa ON K1A 0P7

October 21, 2016

To The Hon. Jean-Yves Duclos,

I'm writing you on behalf of [Raising the Roof](#), a national charity dedicated to long-term solutions to homelessness in Canada. For nearly 20 years, the organization has worked to address the issue and advocate for those at-risk of or experiencing homelessness. The organization's new strategic directions outline a focus on homelessness prevention, an important part of the solution in ending homelessness for good.

With more than 235,000 people experiencing homelessness each year and an increasing percentage of the population facing housing insecurity, the development of a National Housing Strategy is necessary NOW to guarantee access to housing for all Canadians, particularly our most vulnerable.

When you released a call for submissions, we recognized the opportunity to share our input to ensure that addressing homelessness is a key element of the strategy. We developed preliminary recommendations and provided these to approximately 60 of our partnering front-line agencies across the country for their feedback. We have incorporated their responses, as well as those of our national partners, into our final set of recommendations, outlined in the pages to follow.

Thank you for taking the time to carefully review and consider our recommendations as you begin outlining the National Housing Strategy. Should you have any questions regarding Raising the Roof's submission, please don't hesitate to contact us at any time.

Together, we can ensure access to housing for all Canadians is put into policy.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Hughes".

James Hughes
Interim Executive Director
Raising the Roof

Recommendations for a National Housing Strategy

Recommendation 1.0 – Direct Investment in Homelessness Prevention Programs

The Government of Canada should adopt a national goal of ending homelessness with clear and measurable outcomes, milestones and criteria, including a specific focus on homelessness prevention ([SOHC 2016](#)).

Preventing homelessness requires addressing the root causes, which primarily stem from systemic failure. Commitment from both the federal and provincial/territorial governments is required to implement greater systems coordination and integration. A Prevention Framework, set to be released by the Canadian Observatory on Homelessness, will support this shift.

We recommend direct investment in homelessness prevention programs and the development/implementation of innovative prevention models. This will include investment in a range of program models that incorporate Primary, Secondary and Tertiary prevention interventions. This work is best achieved at the community-level, but requires support and investment from the provincial/territorial and federal levels.

An example of a world-class primary prevention program currently being tested by Raising the Roof is [The Upstream Project](#), an initiative that works to identify youth at-risk of homelessness by working within the school system. In identifying young vulnerable young people before they experience homelessness, we can intervene and provide necessary supports and services.

Recommendation 2.0 – Investments to Target People Experiencing Homelessness

We recommend investments to target people experiencing or at risk of homelessness including adults, youth, children, families, veterans and Indigenous peoples. This can be achieved through extended renewal and expanding the scope of the Homelessness Partnering Strategy (HPS), a federal program in which funding goes to 61 community entities which are empowered to determine local priorities within the context of guidelines and through mandated community plans.

This includes:

1. Increasing HPS funding to its initial investment levels set in 1999
2. Commitment to 10 additional years of HPS funding upon renewal in 2019



3. Maintained funding for programs already in-place that have proven to be effective.
4. New funding opportunities for both the 61 communities already receiving funding and others.
5. Funding for high risk demographics and ongoing consultation with individuals with lived experience.

Recommendation 3.0 – Investment in Preventing, Reducing and Ending Youth Homelessness

We recommend direct investment in initiatives and programs to prevent, reduce and end youth homelessness. This includes: Housing First for Youth, school-based, family-based, place-based, and systems-based responses. This must also include a specific focus on youth mental health.

To further innovation around youth homelessness and offer more opportunities for knowledge sharing between provinces, territories and communities, the government should convene a Federal-Provincial-Territorial Planning Table. The Planning Table would be cost-neutral, offering an opportunity for all levels of government to evaluate how their systems (physical/mental health, corrections, child welfare, etc.) help or hinder efforts to prevent and end youth homelessness. Policies, programs and systems at the federal, provincial, and territorial levels can then begin to strategically align in order to support community systems planning efforts (A Way Home, 2016).

Recommendation 4.0 – A Human Rights Approach to Homelessness

We recommend a human rights approach that embraces the idea that all people have a fundamental, legal right to be free of homelessness and to have access to adequate housing, as established in the United Nation’s Universal Declaration of Human Rights.

This will include:

1. Establishing a Canadian Charter to support and protect this human right.
2. Enforcing this Charter right with national legislation.

Recommendation 5.0 – A National Housing Benefit

We recommend a National Housing Benefit - a new program to assist those who face a severe affordability problem in their current accommodation. This proposed federal government program, operated through the Canada Revenue Agency, will assist low income Canadians, where a monthly cash payment would go directly to households with low incomes and burdensome housing costs.

This program will:



1. Use creative solutions to keeping vulnerable individuals in their current accommodations.
2. Apply to residents of provinces/territories that do not have a Housing Benefit of equal or greater support.
3. Be indexed to local economies and housing prices.

Recommendation 6.0 – Affordable Housing Framework Agreement

We recommend a new Federal – Provincial/Territorial Affordable Housing Framework agreement. That is, a set of clear priorities and expectations for government investment that reflect the reality that homelessness and homelessness systems are local/regional in nature and that investment planning/allocation must be as such.

This plan will:

1. Be developed in partnership with local Community Advisory Boards.
2. Address the unique housing needs of Northern Canada.
3. Incorporate a focus on accessibility.
4. Include dedicated affordable housing for people experiencing homelessness.
5. Address the unique needs of both urban and rural communities.

Recommendation 7.0 – Direct Investment in Affordable Housing Programs

We recommend direct investment in affordable housing programs. That is, a continued investment in federal funding for Social Housing, Co-ops and Non-profits. In addition, renewing funds for the Investment in Affordable Housing initiative (IAH), a cost/shared (50/50) funding program for housing involving federal, provincial and territorial governments.

Considerations for this investment include:

1. Rent geared to income.
2. Funding for renovations and upkeep.

Recommendation 8.0 – Expanded Investment in Indigenous Housing

We recommend expanded long-term investment in Indigenous housing both on and off reserve. This must address the growing concern that on-reserve housing is inadequate and existing stock is deteriorating rapidly due to substandard construction practices and materials, lack of proper maintenance, and overcrowding.

This recommendation aligns with the federal government's commitment to honour the findings of the Truth and Reconciliation Commission, which should be used to guide this



investment. Furthermore, a housing effort must engage Indigenous communities across Canada in developing and implementing Indigenous-led strategies.

Recommendations for this investment include:

1. Insured quality of building materials (to protect a long-term investment).
2. Proper oversight of building projects by government-appointed bodies.
3. Education among housing providers to reduce the stigma experienced by Indigenous peoples in accessing good quality, affordable housing.

Recommendation 9.0 – Affordable Housing Tax Credit

We recommend the creation of an affordable housing tax credit. This tax credit is designed to give private equity investors reductions in federal income tax for dollars invested in qualifying affordable housing project.

Considerations for this credit include:

1. Post-construction, affordable housing units would be regulated by government-approved property management organizations.
2. In addition to investors, this credit would also include a tax incentive for individuals and/or companies to donate housing stock to non-profit housing programs.

