



YWCA
TORONTO

NATIONAL ADVOCACY.
COMMUNITY ACTION.



United Way
Greater Toronto

Neshalia Mohindra
Manager, Community Housing Renewal Unit
Ministry of Municipal Affairs and Housing
777 Bay St., 14th Floor
Toronto, ON M7A 2J3

February 18, 2022

Subject: YWCA Toronto's response to proposed regulatory amendments related to service agreements, service level requirements, and access

Dear Neshalia Mohindra,

Thank you for the opportunity to provide input toward the proposed amendments to O. Reg. 367/11 under the *Housing Services Act, 2011* (HSA) related to service agreements, service level requirements, and access.

YWCA Toronto is the city's largest multi-service organization serving women, girls, and gender diverse people. Each year, our Association serves over 13,000 people in more than 30 programs. Our programs promote equity and help community members escape violence, move out of poverty, and access safe, affordable housing. We also engage in systemic advocacy to challenge gender and racial inequities. To learn more about our Association, please refer to our [2021 Annual Report](#).

We are a member of the Ontario Non-Profit Housing Association (ONPHA) and we strongly support the recommendations detailed in its submission (attached).

As housing providers working on the frontlines, our staff have experienced firsthand the challenges brought on by the housing crisis, which are exacerbated by the pandemic. There is much at stake for the residents in our housing programs at YWCA Toronto.

We share ONPHA's concerns around the narrow timelines under which this consultation is taking place, the vast scope of the proposed regulatory amendments within those timelines, and the limited policy direction provided by the Province to date on these three significant areas of regulatory development. We hope to see all community housing sector partners – including housing providers like ourselves, engaged early and frequently.

Most concerning are the challenges and uncertainties related to the end of operating agreements and mortgages, which could put ~60,000 subsidized units at risk. At YWCA

Toronto, two of our sites will be directly affected, including one of our Violence Against Women shelters and 77 units at our Pape Avenue Apartments.

We need the regulatory development process to protect existing units and facilitate our sector's ability to leverage assets for further growth and long-term sustainability.

Thank you for the opportunity to provide input from a non-profit housing provider's perspective directly impacted by the proposed regulatory amendments.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather M. McGregor".

Heather McGregor
Chief Executive Officer, YWCA Toronto
mcgregor@ywcatoronto.org