



Sent via fax
416-585-6470

September 30, 2009

Honourable Jim Watson
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

Dear Minister:

I am writing on behalf of the AMO Board of Directors regarding potential amendments to the *Social Housing Reform Act, 2000 (SHRA)*.

The Government's commitment to a Long-Term Housing Strategy for Ontario and the complimentary agreement through the Provincial-Municipal Fiscal and Service Delivery Review to consolidate more than 20 housing and homelessness programs, are important advances toward improved housing outcomes for Ontarians.

These advances will need to be secured through fundamental change to the current statutory framework of the SHRA, which was written for a different purpose and a different era, an era not characterized by partnership or constructive provincial-municipal relations.

At the September 25, 2009 meeting of the AMO Board of Directors, consideration was given to these important matters. Two recommendations were adopted by the Board which we are providing for your consideration.

It is widely agreed that the SHRA is unnecessarily prescriptive and fails to respond to the housing needs in our communities. The AMO Board recognizes that the consolidation of housing and homelessness programs will necessitate a fundamental rethinking of the Act and Regulations. While transitional amendments will be needed in the short and medium term, our shared long-term objectives will require a new approach based on a framework of shared accountability.

AMO recommends that the *Social Housing Reform Act* be amended such that it facilitates the transition to the consolidation of all housing and homelessness programs into a single, outcome-based housing program consistent with the report of the PMFSDR.

The AMO Board also viewed the opportunity to amend the Act as an opportunity to create renewed municipal support for the important work of the Social Housing Services Corporation (SHSC).



As currently written in the Act, the mechanism by which appointments to the SHSC Board are carried out is unclear. A review of the Act as part of the Long term Affordable Housing Strategy creates an opportunity to improve the legislative framework governing the SHSC.

The SHSC performs important functions in the service of all housing partners including municipalities and DSSABs. In AMO's view, the SHSC operates effectively and serves its members well. This is attributable largely to the effective board governance of the organization, in spite of vagueness in the Act on how the SHSC Board is appointed.

The Act and Regulations are silent on the process for these appointments, and neither the Act nor the Regulations require consideration or overall board competencies or experience. In addition, there is no recognition of the collective interests of the municipal sector as a whole and, therefore, no notion of accountability to the municipal sector as a whole. As the primary funders of housing in Ontario, the interests of municipal governments require special consideration which could be accomplished through a cohesive approach to the appointment of municipal representatives to the SHSC Board.

If the legislation were amended to vest AMO and the City of Toronto with the responsibility of appointing municipal and DSSAB representatives on a go-forward basis (i.e., as vacancies occur) the SHSC (and the Government) would be more certain of having a Board composition that reflects the combination of skills needed to provide oversight to the corporation.

Such a change would be consistent with recent changes to the appointment process for the OMERS Sponsorship and Administration Corporations and Waste Diversion Ontario and with the long-standing appointment process for MPAC, where the Government and the Legislature recognize that AMO and Toronto together represent the collective interests of all municipal governments in Ontario.

The AMO Board is recommending that the *Social Housing Reform Act, 2000* be amended to vest AMO and the City of Toronto with the responsibility of appointing municipal and DSSAB representatives to the Social Housing Services Corporation on a go-forward basis.

AMO believes that our recommendations are critical steps in creating a housing system in Ontario that is focused on the real housing issues in our province in an accountable, transparent and responsive way.

Sincerely,



Peter Hume
President

cc. Dana Richardson, Assistant Deputy Minister, MMAH
Marcelle Crouse, Director, Intergovernmental Relations and Partnerships, MMAH
Sue Corke, Deputy City Manager, City of Toronto
Roger Maloney, Chair, SHSC
Lindsey Reed, Chief Executive Officer, SHSC