



March 9, 2015

Hon. Brad Duguid, Minister
Ministry of Economic Development, Employment and Infrastructure
Legislative Building
Queen's Park
Toronto ON M7A 2E1

Dear Minister Duguid:

Re: District Social Services Administration Boards (DSSABs) and long term lending through Infrastructure Ontario

The purpose of this letter is to request your Ministry review and amend the Ontario Infrastructure and Lands Corporations Act in order for District Social Services Administration Boards (DSSABs) to be eligible applicants under the Infrastructure Ontario Loan Program.

DSSABs are corporations created pursuant to the District Social Services Administration Board Act (the “**DSSAB Act**”). The purpose of their creation was a result from the Local Service Realignment initiative that was embarked upon by the Province of Ontario and municipalities in 1998. In total, 37 Consolidated Municipal Services Managers and 10 District Social Services Administration Boards were created. The DSSAB Act required DSSABs to administer social services in northern Ontario, which includes housing, child care and Ontario Works. A DSSAB is governed by its members, who are appointed by the municipalities and unincorporated territories within the geographic boundaries for which the DSSAB is responsible.

DSSABs are also governed by Parts I, III and VII of the Corporations Act (Ontario). DSSABs have been provided with Natural Person Powers and can contract in their own names, including contracting to borrow funds (also, please see the attached legal opinion).

Further, DSSABs are designed as Service Managers under the Housing Services Act (“**HSA**”). The HSA does not provide any express limitation to the powers of a DSSAB when acting as the Service Manager. The HSA does provide powers in addition to the natural person powers whereby a DSSAB can compel a prescribed municipality to issue debentures to raise funds to finance improvements to an existing housing or obtain financing for a project. We believe that this is a holdover from the Social Housing Reform Act and was originally intended to allow DSSABs to raise funds for repairs of the provincially downloaded housing assets.

It is also important to note that the Government of Ontario and the Government of Canada developed much of the current DSSAB owned housing stock during a time when both levels of government were heavily involved in the social housing sector. As time went on, the Government of Canada began its extraction from the social housing

sector in the 1980's and 1990's; while the Government of Ontario followed this trend in the late 1990's and early 2000's by downloading the housing stock to local municipalities. As a result, much of the current housing stock is nearing the end of its life expectancy and is in need of significant repairs, upgrades and replacement. DSSABs and their local municipalities do not have the financial resources to undertake these repairs or replacements without funding or long term debt financing. In particular, the size in terms of financial resources of some DSSABs, prevent them from even considering making significant repairs or upgrades to their housing stock.

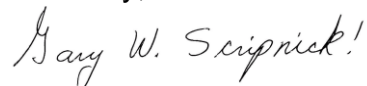
Currently, DSSAB's are not eligible to access the IO programs for any of its programs (social housing (development or renovation), the capital development of child care centres, construction of mandated, Emergency Medical Services bases in rural communities, etc.) and we are requesting that be modified. District Social Service Administration Boards are unique to Northern Ontario and it is discriminatory that our members cannot access IO funds the way other CMSM's and municipalities can.

The Lending Program under Infrastructure Ontario ("IO") should allow those DSSABs that choose to have access to a financing program that will make investing in housing infrastructure possible and more affordable. The IO Lending Program could also provide DSSABs with a means to manage their cash flows while undertaking significant housing repair and replacement projects. The financing rates and long term rate stability offered under the program would also provide DSSABs with the necessary financial stability needed in order to undertake certain housing projects.

Given that Municipalities and Housing Corporations are already eligible under IO lending program, there is no reason to exclude the 10 DSSABs from having access to the same program. By allowing DSSABs to be eligible applicants under the IO Lending Program, your Ministry would be providing the many small and rural communities in Northern Ontario with a means of beginning to address the significant social housing deficit that currently exists. This would also eliminate unnecessary impediments that are in the way of DSSABs' ability to address pending housing needs in their respective jurisdictions.

Thank you in advance for addressing this important matter.

Sincerely,



Gary Scipnick, Chair

cc. Ted McMeekin, Minister of Municipal Affairs and Housing
Helen Jazcek, Minister of Community and Social Services
Liz Sandals, Minister of Education
Eric Hoskins, Minister of Health and Long Term Care
Jim Adams, Director, Ministry of Municipal Affairs & Housing
Alan Spacek, President, Federation of Northern Municipalities (FONOM)
David Canfield, President, Northwestern Ontario Municipal Association (NOMA)