



BOARD REPORT

REPORT No.: 2023-20

MEETING DATE: MAY 18, 2023

SUBJECT: HOUSING INCOME AND ASSET LIMITS POLICY

RECOMMENDATION

THAT with respect to Report No. 2023-20 (Integrated Social Services Division) we, The District of Thunder Bay Social Services Administration Board, approve the draft Housing Income and Asset Limit Policy as attached;

AND THAT the Chief Administrative Officer be authorized to amend the Housing Income and Asset Limit Policy with respect to housekeeping items, as may be required from time to time.

REPORT SUMMARY

To present the Board with a draft Housing Income and Asset Limit Policy for approval.

BACKGROUND

Ontario Regulation 367/11 has been amended to require Service Managers to set local income and asset limit rules to determine eligibility for Rent Geared to Income (RGI) community housing.

To be eligible for RGI under the new amendment, an applicant's adjusted family net income (AFNI) cannot be more than the applicable income limit. AFNI is the annual net income of all members of the applicant household that is expected to be received over the following 12 months. Generally, AFNI includes only income that would normally be used in the RGI calculation. Applicant assets are not included in the AFNI.

Under the amendment, Service Managers are required to:

1. Set local income limits at least at the household income limit (HIL) prescribed for their service area under Ontario Regulation 370/11.
2. Set local asset limits to a base of at least \$50,000.
3. Periodically review and update their local income and asset limit rules, at their discretion.

COMMENTS

In order to comply with Ontario Regulation 367/11 amendments, Administration reviewed the amendments and sought input from Service Managers across the province, with particular focus on those operating in Northern Ontario, to ascertain the current and proposed limits on income and assets to determine eligibility for access to community housing.

To establish the asset limit, TBDSSAB reviewed the current and proposed asset limits from service managers across the province, with particular attention to Northern Ontario. Larger Northern service managers had established limits at \$150,000, while smaller service managers were between \$40,000 and \$100,000. This was similarly reflected in communities across Ontario, however some areas had much higher limits due to higher property values and greater average incomes. As a result of this research, and factoring the District's average home values and earnings, an asset limit of \$150,000 was determined to be appropriate.

TBDSAAB currently uses the HIL for the income calculation of applicants but did not have an asset limit and, as such, must set asset limit rules.

The options for those currently on the RGI waitlist are:

- Allow the approximately 65 people with assets greater than \$150,000 to remain on the RGI waitlist and have the new policy apply to all new applicants, OR
- Notify and remove the approximately 65 people with assets greater than \$150,000 from the RGI waitlist.

It is proposed that applicants on the waitlist be notified of the approved asset limit requirements and any applicant who exceeds the limit would be removed from the waitlist.

STRATEGIC PLAN IMPACT

This report supports the 2020-2023 Strategic Plan visions of establishing flexible, inclusive services through the management of relevant diverse housing.

FINANCIAL IMPLICATIONS



There are no immediate financial implications for TBDSSAB with the approval of the Housing Income and Asset Limit Policy.

CONCLUSION

It is concluded that the draft Housing Income and Asset Limit Policy meets the requirements under the Ontario Regulation 367/11 amendment and should be approved by the Board as presented.

REFERENCE MATERIALS

- Attachment #1 [Housing Income and Asset Limit Policy Draft](#)
- #2 [Housing Income and Asset Limit Procedure Draft](#)

PREPARED BY:	Crystal Simeoni, Manager, Housing Programs
SIGNATURE	
APPROVED BY	Ken Ranta, Director, Integrated Social Services Division
SIGNATURE	
SUBMITTED BY:	William (Bill) Bradica, Chief Administrative Officer

POLICY	CATEGORY/SECTION ISS – HOUSING PROGRAMS
	SUBJECT HOUSING ASSET LIMITS

AUTHORITY

Housing Services Act 2011
Ontario Regulation 367/11
Board Resolution 23-XX.

INTENT OF POLICY

To clearly define asset limits as related to eligibility for Rent Geared to Income (RGI) housing where eligibility is determined by the District of Thunder Bay Social Services Board (TBDSSAB).

DEFINITIONS

Asset Limit – a local eligibility rule limiting the amount of assets a household may have and still be eligible for RGI Housing.

POLICY

In compliance with Ontario Regulation 367/11, TBDSSAB uses asset limits as a measure of eligibility for the centralized waitlist and subsequently RGI housing.

STANDARDS OF APPLICATION

This policy applies to all applicants, co-applicants, tenants, and household members, excluding those who receive Ontario Works (OW) or Ontario Disability Support Program (ODSP) from a non-First Nation Administrator.

Extenuating circumstances will be considered. Where Special Priority Program (SPP) applicants own real property jointly, the value of the equity in the property is not included under the asset limit until the property has been divested. Other assets may be temporarily deferred from consideration under the asset limit with the approval of the Manager, Housing Programs.

Household assets are reported as part of the application. These assets are measured and must be under \$150,000, net of eligible exclusions, in order to be determined eligible for RGI Housing.

RELATED PROCEDURES

Housing Asset Limits Procedure



**THE DISTRICT OF THUNDER BAY
SOCIAL SERVICES ADMINISTRATION BOARD**

PROCEDURE	PROCEDURE NAME	Housing Asset Limits
	PROCEDURE NUMBER	ISS-xx:xx
	PROCEDURE SECTION	Integrated Social Services – Housing Programs
	POLICY REFERENCE	ISS-02:158
	REVISION DATE	n/a
	SUPERSEDES	n/a
	IMPLEMENTATION DATE	2023

PROCEDURE STATEMENT:

To ensure a clear process exists for evaluation of asset limit eligibility for Rent Geared to Income (RGI) housing applications.

PROCEDURE:

All applications for RGI housing are received and processed by Intake and Eligibility.

Applicants in receipt of Ontario Works (OW) and Ontario Disability Support Program (ODSP) are exempt from compliance with asset limits at application, annual update, and offer of housing. Special Priority Program (SPP) applicants may be exempt from asset limits. Review and consent by the Manager, Housing Programs is required for an exemption related to SPP.

Household assets are reported as part of the application. These assets are measured and must be under \$150,000 to be determined eligible for RGI Housing.

These limits apply to applicants and those on the centralized waitlist as of July 1, 2023.

Applicants are required to complete an annual update, and eligibility will be determined and those over \$150,000 in assets will be removed after July 1, 2023.

Joint assets are material to determination of asset limits.

Applicants must substantiate assets that are jointly owned for purposes for managing another person's finances (i.e., elderly parent) with legal documentation (including but not limited to Power of Attorney or trust account). A letter or informal agreement is not sufficient.

Assets held by common-law or married couple(s) that are separating or an SPP applicant that is being sponsored by their abuser shall be temporarily exempt until assets have been divided. Associated documentation (separation agreement, immigration paperwork or other acceptable verification) must be provided.

Upon review of a complete application, timely communication in the agreed upon manner stated in the application will be provided to the applicant of their eligibility for RGI Housing.

The following assets are to be excluded from the asset calculation:

- Business assets – tools of a trade essential to employment
- Assets necessary to operate a business up to a maximum of \$20,000 for that household member and up to a maximum of \$20,000 for that business
- Amount received as damages or compensation for pain and suffering due to injury or death of a household member and expenses reasonably incurred as a result of the injury or death of a household member
- Loans against a life insurance policy used for disability-related services
- Registered Disability Savings Plan (RDSP)
- Trust fund of housing member with a disability if derived from inheritance OR if derived from proceeds of a life insurance policy AND up to a maximum value of \$150,000 for that household member
- Payment under the *Ministry of Children, Community and Social Services* for successful participation in program of activities that assist with completion of high school diploma, development of employment related skills or further development of person's parenting skills
- Registered Education Savings Plan (RESP)
- Registered Retirement Savings Plan (RRSP)
- Registered Retirement Income Fund (RRIF)
- Life Income Fund (LIF)
- Life Retirement Income Fund (LRIF)
- Locked-in Retirement Account (LIRA)
- One vehicle per household member
- Clothing, jewellery, and other personal effects
- Furniture
- Prepaid funeral
- Cash surrender value of a life insurance policy up to a maximum of \$150,000 for the household.

EMPLOYEE TRAINING

Procedure to be reviewed by affected staff.
