



## BOARD REPORT

REPORT No.: 2025-44  
MEETING DATE: NOVEMBER 20, 2025  
SUBJECT: ROMA 2026 POSITION PAPERS

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### RECOMMENDATION

THAT with respect to Report No. 2025-44 (Chief Executive Officer Division) we, The District of Thunder Bay Social Services Administration Board (the Board) approve the 2026 Rural Ontario Municipal Association (ROMA) Position Papers as presented;

AND THAT we direct the Chief Executive Officer (CEO) to send the final delegation package to the appropriate provincial Ministries;

AND THAT a copy of the approved delegation briefings package be sent to Thunder Bay District municipal councils for endorsement;

AND THAT the CEO attend the 2026 ROMA Annual Conference to provide support to the Board Chair and other Board members in their meetings with provincial officials regarding these issues.

### REPORT SUMMARY

To provide the Board with the position papers for the 2026 Rural Ontario Municipal Association (ROMA) Annual Conference for review and approval.

### BACKGROUND

ROMA will be holding its 2026 Annual Conference on January 18-20, 2026 in Toronto. As part of the conference programming, organizations may submit requests for delegation meetings with Ministers.

### COMMENTS

Position papers have been drafted on five issues that are recommended to the Board for advocacy with provincial representatives.

The proposed advocacy topics include:

- 1) Increased Allocation of Licensed Child Care Spaces in the District of Thunder Bay
- 2) Keeping Our Community Housing Safe: Special Constables Pilot
- 3) COCHI-OPHI Investments for the Future of Housing in the District of Thunder Bay
- 4) Social Assistance Benefits Eligibility for Clients Entering Residential Treatment Facilities
- 5) Supporting the Maintenance of the Urban Native Housing Units (with DNSSAB)

### STRATEGIC PLAN IMPACT

This Report aligns with the 2024-2027 strategic plan's Advocacy-related objectives.

### FINANCIAL IMPLICATIONS


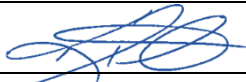
There are no immediate financial implications related to this report.

### CONCLUSION

It is concluded that the 2026 ROMA position papers are presented for review and approval.

### REFERENCE MATERIALS

- Attachment #1 [ROMA Position Paper – Licensed Child Care Spaces](#)  
 #2 [ROMA Position Paper – Special Constables Pilot](#)  
 #3 [ROMA Position Paper – COCHI-OPHI Investments](#)  
 #4 [ROMA Position Paper – Social Assistance RTF](#)  
 #5 [ROMA Position Paper – Urban Native Housing \(with DNSSAB\)](#)

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THE DISTRICT OF THUNDER BAY  
SOCIAL SERVICES ADMINISTRATION BOARD

# Increased Allocation of Additional Licensed Child Care Spaces in the District of Thunder Bay

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## POSITION PAPER

**January 2026**

**Rural Ontario Municipal Association (ROMA) Conference**

Prepared by:

The District of Thunder Bay Social Services Administration Board

Prepared for:

Hon. Paul Calandra, Minister of Education

# Brief

The District of Thunder Bay Social Services Administration Board (TBDSSAB) requests that the Ministry of Education increases the allocation of child care spaces in the District of Thunder Bay to support the growing need for child care within the district.

## Summary

Since the implementation of the Canada-Wide Early Learning and Child Care (CWELCC) system, there has been a significant increase in families seeking child care in the District of Thunder Bay. Supporting these families in accessing quality child care is a priority for TBDSSAB and is constrained by the allocation of new spaces from the Ministry. TBDSSAB has always met its allocated targets, and this year was able to meet the planned allocation of 86 new spaces as well as filling an additional 57 spaces provided through the recalibration enhancement. Aside from limited licensed spaces, the increased demand for care is also influenced by the limited number of Registered Early Childhood Educators (RECE) available to meet the staff to child ratios. Therefore, there is a need to increase allocation of licensed CWELCC child care spaces in the district, while also continuing to develop and support the child care workforce to maintain those spaces.

## Background

As part of the Canada-Wide Early Learning and Child Care (CWELCC) agreement, the Ontario Government committed to the addition of 86,000 new licensed child care spaces across the province by the end of 2026 and \$10 per day child care fees by March 2026. As of March 2025, there has been about 39,500 net new, affordable child care spaces in the province. As for the northwestern district, between 2024-26, TBDSSAB was approved for a total of 196 additional spaces.

Despite the growth expansion plans, the waitlist for child care in the District of Thunder Bay continues to grow as parents' fees have decreased, thereby making it a challenge to find available child care spaces. In September 2024, TBDSSAB had a waitlist of 3,910 children. As of August 2025, TBDSSAB's waitlist increased to 4,857 children, with 3,703 children (76.2%) seeking placement immediately<sup>1</sup>.

Since January 2025, an average of 72 children have been placed monthly. At this rate, it will take 51.8 months (4 years and 3 months) for all the currently waitlisted children seeking immediate care to be placed. This projection does not account for any new additions to the waitlist. It is also worth noting that most children on the current waitlist are 'CWELCC-eligible', as 83.5% of the applications are seeking care in Infant, Toddler, Preschool, and Kindergarten age groups.

Given the total population of children aged 0-4 years old in the District of Thunder Bay, only 21.2% of CWELCC-aged children have access to care in the district<sup>2</sup>. With access rates in the Northwest region being lower than provincial average<sup>3</sup>, there is a need to increase the percentage of children who have access to care. Provincially, the access target is 37%, placing TBDSSAB well below this target. Addressing this issue would require an increase in allocation of CWELCC licensed spaces and recruitment of more Registered Early Childhood Educators (RECEs) to meet the staff-to-child ratios.

To ensure that children have access to quality care, TBDSSAB also recognises a need for more RECEs in the field. As of August 2025, there is a total of 300 full-time equivalent program staff (RECE and Non-ECE) working in the district. RECEs make up 165 Full Time Equivalent (FTE) staff in the district. To meet the total licensed capacity, service providers in the district would need to employ approximately 22 additional FTE program staff<sup>4</sup>.

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<sup>1</sup> Seeking placement immediately includes children who's preferred start date on their application is prior or equal to today's date, or up to 3 months into the future. For example, if today's date was September 12, 2025, and John's preferred start date is December 2025 this would be categorized as seeking placement immediately.

<sup>2</sup> As of August 2025, there were 1433 CWELCC-aged children in care in the district. Based on Statistics Canada (2021) Census Profile, The District of Thunder Bay has 6765 children aged 0-4 years old. [Profile table, Census Profile, 2021 Census of Population - Thunder Bay, District \(DIS\) \[Census division\], Ontario.](#)

<sup>3</sup> As of 2023, the provincial average for access to care for CWELCC spaces was 37% at which point, the District of Thunder Bay was at 21% access to care- one of the lowest rates in the province (Access Rates for CWELCC Spaces by Region, 2024. Ministry of Education).

<sup>4</sup> Approximation of additional staff needed is based on the minimum number of FTE program staff required as per provincial staffing ratio requirements.

Since the implementation of the RECE Fast Track program, a partnership between TBDSSAB and Confederation College, 12 of 15 registrants are completing the program requirements and are on the path to becoming RECEs<sup>5</sup>. While the program has been successful, the district is still in need of more RECEs to meet the increased demand for child care. The need for more RECEs is seen throughout the province. It is estimated that up to 10,000 additional RECEs could be needed in the field by December 2026 to support the growing need for care.

The benefit of increasing the RECE workforce is that child care operators would be able to place more children at a quicker rate – while meeting the staff-to-child ratio - and in turn, steadily decrease the number of children on the district's waitlist<sup>6</sup>.

Based on a distinct count of children with access to care in licensed child care spaces from January to August 2025, the district is using approximately 73% of its licensed child care spaces, with 67% of that proportion being CWELCC-eligible children.

Although the district has not reached the maximum average operating capacity, more licensed spaces would enable TBDSSAB to allocate them to the operators who have reached their capacity and have the resources to accept more children into care. Out of the 39 sites that were open in August 2025, 20 of them were operating at 90% or higher of their licensed capacity based on a distinct count of children in their care.

To support the growth of child care spaces in the District of Thunder Bay, TBDSSAB would like to present two requests. The first would be for the Ministry of Education to consider allocating 225 more CWELCC licensed spaces in the district that will allow TBDSSAB to work with operators to address the growing waitlist in the district.

To support the capital costs associated with increasing CWELCC licensed spaces, TBDSSAB is requesting a total of \$3,950,000 in ELCC Infrastructure Funding. Of that, \$2,850,000 would accommodate 163 more community-based spaces, including 98 spaces for Indigenous organizations. Additionally, \$1,100,000 would accommodate 62 more school-based spaces, including 26 Francophone spaces.

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<sup>5</sup> The 12 registrants graduated from the first cohort, the second cohort will have another 12 graduates in 2026 and by 2027, 15 more have enrolled and will graduate with a total of 39 by 2027.

<sup>6</sup> This correlation is validated by the recently released Office of the Auditor General's Performance Audit report (2025).

The second request would be for the Ministry to consider providing additional funding to support the recruitment and retention of RECEs. We believe that fulfilling these intersecting requests would provide resources that enables the District of Thunder Bay to meet the provincial average access rate of 37%.

Therefore, TBDSSAB requests that the Ministry of Education provide TBDSSAB more CWELCC space allocations to increase the districts access to care to help meet the needs for child care services as seen in the districts growing waitlist. In addition, TBDSSAB requests more funding to support the development of the RECE workforce and the increase in operational costs in Northern and remote communities.



THE DISTRICT OF THUNDER BAY  
SOCIAL SERVICES ADMINISTRATION BOARD

# Keeping Our Community Housing Safe: Special Constables Pilot

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## POSITION PAPER

**January 2026**

**Rural Ontario Municipal Association (ROMA) Conference**

Prepared by:

The District of Thunder Bay Social Services Administration Board

Prepared for:

Hon. Michael S. Kerzner, Solicitor General of Ontario

## Brief

The District of Thunder Bay Social Services Administration Board (TBDSSAB) requests that the Solicitor General of Ontario accepts our proposal for funding a two-year pilot project to address the safety of the residents living in Community Housing. This funding would assist with the creation of a team of Special Constables from the Thunder Bay Police Services (TBPS) that would service TBDSSAB direct owned housing and help provide safe and secure neighbourhoods for residents and our community.

## Summary

In recent years, the tenant demographic served by TBDSSAB has changed significantly. Previously, tenant demography constituted primarily of low-income families and seniors. Recently, due to the high incidence of homelessness and a desire to house individuals, the resident mix of TBDSSAB's direct-owned housing units include individuals experiencing high risk behaviours, those who may be extremely vulnerable and some residents who are not capable of independent living. Given TBDSSAB's responsibility of delivering community housing under the Housing Services Act, we cannot deny applications from these vulnerable individuals. In addition to this change in applicants, the District of Thunder Bay has experienced a dramatic increase in crime. Often, there is an intersection between the perpetrators of criminal acts and tenants, which has resulted in an increase in deviant behavior around our directly owned properties. The combination of these issues has put pressure on TBDSSAB's ability to maintain a safe and secure environment for its tenants and staff who help manage the properties.

## Background

As part of its mandate as a housing service manager, TBDSSAB operates properties throughout the district, with majority located within the City of Thunder Bay. In the past, the majority of the tenant demographic residing in TBDSSAB's properties constituted low-income families and seniors. However, in recent years, the tenant demographic has widened to include individuals living with mental health and/or addiction issues and people who are incapable of living independently. These demographic changes have resulted in criminal elements taking advantage of some of the vulnerable population living in these properties. Two news articles – published 10 years apart – attest to the increase in criminal activities and the effect on its residents<sup>1</sup>.

According to Stats Canada's 2021 Population Census, the District of Thunder Bay is home to a population of 146,862<sup>2</sup>. In March 2025, Fraser Institute released a report titled 'Comparing Recent Crime Trends in Canada and the United States'<sup>3</sup>. In the report, the author compared violent crime rates per capita in census metropolitan areas (CMAs) from 2019-2022. In his assessment, the author found that the City of Thunder Bay has the highest 'violent crime rate' in Ontario (at 546 per 100,000) and second in Canada<sup>4</sup>, as shown in the image below. It is worth noting, in the context of this paper, that many research studies have shown the correlation between the perpetrators of criminal activities and vulnerable population(s).

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<sup>1</sup> In a 2023 CBC news article, a TBDSSAB tenant – who has lived in the property for four year – said “she no longer brings her grandchildren to visit because she feels it's so unsafe” ([Thunder Bay Housing residents living in fear | CBC News](#)). Another article, published in 2023, also highlighted continued tenancy concerns ([How drug trafficking and shootings in Thunder Bay's social housing impact people living there | CBC News](#)).

<sup>2</sup> Statistics Canada, 2021 Census of Population.

<sup>3</sup> This report used comparisons of compatible/comparable categories of different offences across Canada and the US. In its assessment, the author shows comparisons between 'Violent crime rates' and also 'Property Crime Rates'.

<sup>4</sup> The report shows that “for violent crimes, Winnipeg ranks first at 675 violent crimes per 100,000, followed by Thunder Bay, at 546 per 100,000” (Di Matteo 2025). Obtained from Fraser Institute, 'Comparing Recent Crime Trends in Canada and the United States'. <https://www.fraserinstitute.org/studies/ranking-crime-in-canada-and-the-united-states>.”

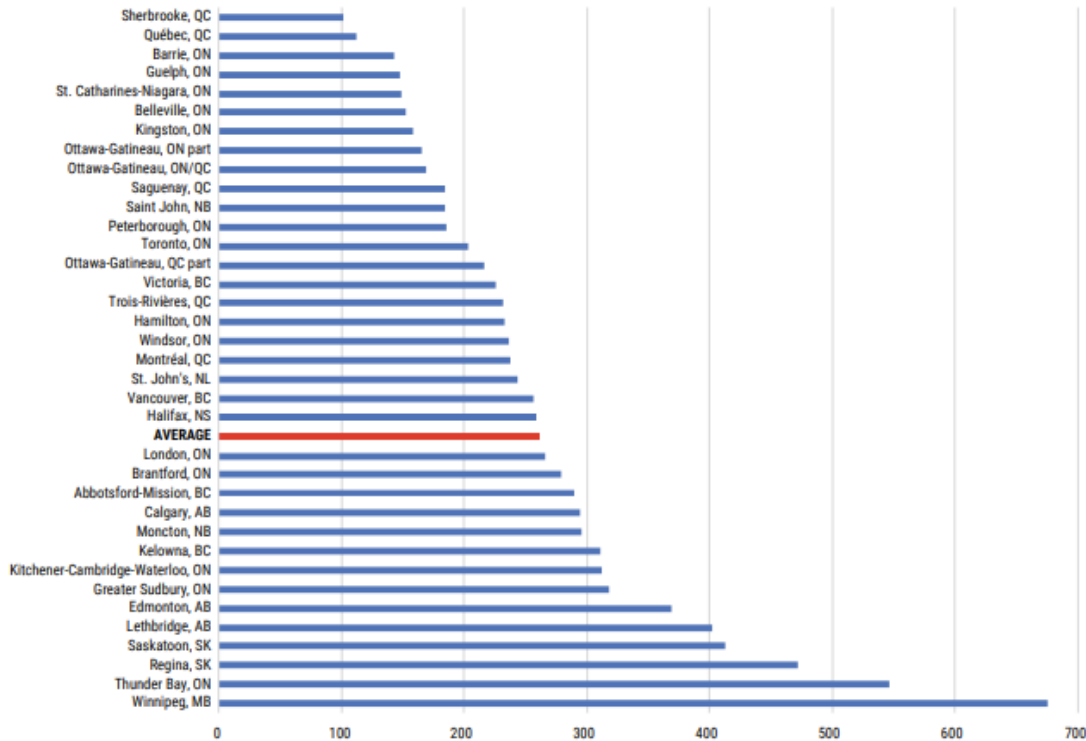


Figure 1 - Select Canadian CMAAs, Maximum Violent Crime Rate per 1000,000, 2019-2022 (Di Matteo:2025)

Based on the Auditor General of Ontario’s classification of groups considered as part of the vulnerable population, we consider that a significant contingent of TBDSSAB’s tenants – i.e. experiencing mental health and/or addiction issues – fall under this grouping. As a result of the intersection mentioned in the previous paragraph, tenants have voiced concerns about not feeling safe in their homes and neighborhood. News articles are replete with stories from TBDSSAB tenants who are “scared to leave their homes...” with concerns about “drug trafficking taking place in the building, with non-residents regularly on the premises”<sup>5</sup>.

To address these concerns, TBDSSAB approached the security issue using a multi-pronged approach. TBDSSAB has invested heavily in video surveillance equipment, engaged in Crime Prevention Through Environmental Design (CPTED) improvements<sup>6</sup>, contracted extensive third-party security services and engaged on regular and ongoing tenant education. This also included leveraging our relationship with the Thunder Bay Police Service (TBPS). In 2017, there was an information

<sup>5</sup> CBC News (2025). “Mclvor Court residents hold rally over safety concerns”. Extracted from [Mclvor Court residents hold rally over safety concerns | CBC News](#).

<sup>6</sup> The premise of CPTED is that “the proper design and effective use of the built environment can lead to a reduction in the incidence and fear of crime, and an improvement in life” (CPTED Canada.com)

sharing agreement signed between both parties to provide the TBPS access to TBDSSAB's surveillance recordings. In addition, the partnership also bore collaboration on joint efforts between TBDSSAB staff and the Community Oriented Response and Engagement unit (CORE) of TBPS in 2021. One of the joint responsibilities of the CORE unit is to do home visits mitigating illegal actions<sup>7</sup> taking place within TBDSSAB direct-owned housing. Since its inception till date, there have been 681 joint visits.

Another approach TBDSSAB took was performing a security audit on all directly owned buildings. The outcome of the audit was a report of the findings and recommendations. Among the findings was the impact of perception and how the public hold misconceptions about community housing. And when left unchecked, it exacerbates unfounded beliefs about the population who reside in these properties. Some recommendations include the use of mobile security patrols to discourage and prevent deviant behaviors from occurring.

While the operationalization of the CORE unit has yielded positive outcomes, criminal activities around our properties are still ongoing (news coverage of recent incidents shown in [Appendix A](#) below). Further, TBPS has indicated an inability to fully address the needs at TBDSSAB properties due to a shortage of policing personnel. As such, a collaboration between TBDSSAB and TBPS concluded that creating a team of Special Constables assigned to patrolling our properties and enforcing bylaws and Acts would help address the issue.

The proposed model, similar to the program in Toronto<sup>8</sup>, involves creating a team of Special Constables that consists of one supervisor and four TBPS officers. Given the comprehensive training they have undergone as Peace Officers, this team will be equipped with the appropriate skillsets to address concerns related to substance use and addiction. As such, we believe that the presence of Special Constables around the properties would help mitigate security-related incidents, discourage deviant behaviours from occurring and in turn, allow tenants to feel safe and possibly address the public's misconceptions of community housing. This would also have the added

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<sup>7</sup> These illegal actions include reducing home takeovers and to support at risk-tenants.

<sup>8</sup> Toronto Community Housing collaborated with the Police Service to create the 'Community Safety Unit' of Special Constables. These Constables have the authority to enforce various laws in the City of Toronto if the offence is connected to a Toronto Community Housing or vehicle.

benefit of reduced police calls to TBDSSAB properties, resulting in more time for officers to address other activities throughout the city.

Operationalizing a team of Special Constables would require an operational investment of \$500,000 per year. This proposed cost would enable a consistent presence of the team around our properties. Following the two-year pilot, an assessment on the success and lessons learned would help inform its continuity.

Therefore, TBDSSAB requests that the Solicitor General of Ontario provides funding of \$1,000,000 over 2 years to enable TBDSSAB to work with the Thunder Bay Police Service on a two-year pilot that would involve a team of Special Constables, which would allow us to meet our mandate of providing a safe and secure environment for our tenants.

## Appendix A

### 1. CBC News (2023) Article

Thunder Bay

## How drug trafficking and shootings in Thunder Bay's social housing impact people living there

Recent shooting at Spence Court has put social housing safety in the spotlight



[Sarah Law](#) · CBC News · Posted: Jun 01, 2023 5:00 AM EDT | Last Updated: June 1, 2023

Image one - Obtained from <https://www.cbc.ca/news/canada/thunder-bay/thunderbay-safety-shootings-socialhousing-1.6860822>.

### 2. CBC News (Jan. 2025) article

Thunder Bay

## Homicide at social housing building in Thunder Bay, Ont., sparks calls for more security measures

Death at McIvor Court remains under investigation with no arrests made, police say



[Sarah Law](#) · CBC News · Posted: Jan 29, 2025 4:00 AM EST | Last Updated: January 29

Image two - Obtained from <https://www.cbc.ca/news/canada/thunder-bay/thunder-bay-social-housing-safety-concerns-1.7443946>

3. TBNewswatch (Jan 2025) article

HOME > LOCAL NEWS

## 'Terrified': McIvor Court residents react to homicide

Police still holding the scene Thursday afternoon as investigation continues



Matt Prokopchuk  
Jan 16, 2025 5:15 PM



1 / 3 Thunder Bay police officers hold the scene of a homicide on January 16 2025. | Matt Prokopchuk

Image three - Obtained from <https://www.tbnewswatch.com/local-news/terrified-mcivor-court-residents-react-to-homicide-10088244>

4. CBC News (Feb. 2025) article

Thunder Bay

## McIvor Court residents hold rally over safety concerns

Building was the scene of a homicide this year; residents say drug trafficking, other issues persist

CBC News · Posted: Feb 14, 2025 4:26 PM EST | Last Updated: February 14

Image four - <https://www.cbc.ca/news/canada/thunder-bay/mcivor-court-rally-1.7459791>



THE DISTRICT OF THUNDER BAY  
SOCIAL SERVICES ADMINISTRATION BOARD

# COCHI-OPHI Investments for the Future of Housing in the District of Thunder Bay

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## POSITION PAPER

**January 2026**

**Rural Ontario Municipal Association (ROMA) Conference**

Prepared by:

The District of Thunder Bay Social Services Administration Board

Prepared for:

Hon. Rob Flack, Minister of Municipal Affairs and Housing

## Brief

The District of Thunder Bay Social Services Administration Board (TBDSSAB) requests that the Ministry of Municipal Affairs and Housing (MMAH) provide additional funding through the Canada-Ontario Community Housing Initiative (COCHI), and/or Ontario Priorities Housing Initiative (OPHI) to enable the extended allocation of capital investments towards increasing housing stocks, such as the new 18-unit proposed housing project in Thunder Bay.

## Summary

COCHI and OPHI provide critical funding for TBDSSAB's effective planning for the provision of community housing, which includes supporting capital projects, repairs and maintenance, housing supplements, and homelessness prevention in the district. Through the 2025-26 COCHI-OPHI funding, TBDSSAB invested \$1,341,666 towards a newly proposed 18-unit housing project. This affordable and supportive housing complex will accommodate people with disabilities, people living with mental health and illness or addictions, and those experiencing homelessness in the community. However, the current funding is only able to cover seven of the 18 units, with 11 units requiring additional funding to be completed. The completion of the entire project would provide more housing options for people who require supports and keep them housed long term.

## Background

On April 30, 2018, Ontario and the Canada Mortgage and Housing Corporation signed a Bilateral Agreement regarding the National Housing Strategy. This agreement provided an opportunity to align federal funds with Ontario's Community Housing Renewal Strategy priorities.

Currently, there are two National Housing Strategy funding streams that are transferred to Ontario Service Managers:

- Canada-Ontario Community Housing Initiative (COCHI) - to protect affordability for households in community housing; to support the repair and renewal of existing community housing supply, and to expand the supply of community housing over time.
- Ontario Priorities Housing Initiative (OPHI) - to address local housing priorities, including affordability, repair, and new construction.

Since their inception, these funding streams have become critical to TBDSSAB's effective provision of community housing. In the past five years, COCHI funding has been central to the repairs of over 2,900 housing units, along with supporting maintenance of over 270 existing legacy housing units built under the Urban Native Housing Program. COCHI and OPHI funding streams also significantly impact the TBDSSAB's 10-Year Housing and Homelessness Plan by facilitating the preservation of existing community housing units and supporting the creation of new affordable housing.

The construction of additional supportive and transitional housing units is central to the TBDSSAB's Housing and Homelessness plan. Supportive housing solutions are critical in ensuring successful tenancies, preventing evictions, addressing mental health and addictions issues, and ending ongoing cycles of homelessness in the District of Thunder Bay. Evidence of its importance can be observed at the Lodge on Dawson project that was funded through the Home for Good (HFG) program<sup>1</sup>.

Opened in 2019, the Lodge contains 30 units and serves as an affordable transitional housing option for individuals struggling with chronic homelessness and mental health/substance use challenges, with the goal of moving clients toward their long-term goals and housing<sup>2</sup>. Since opening, the Lodge has provided housing for over 160 individuals, with length of stay varying between a few weeks to a maximum of 365 days.

The Lodge on Dawson provides evidence of a successful transitional housing complex that provides care to individuals who require a wide range of supports in the District of Thunder Bay. However, the need to continue to build more transitional and supportive housing is demonstrated by data that reflects current realities:

- As of September 2025, on the TBDSSAB housing waitlist 98 individuals are under High Needs Homeless (HNH) status, which prioritizes people experiencing

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<sup>1</sup> HFG is now part of the Homelessness Prevention Program (HPP) that funds temporary housing and appropriate social supports to facilitate successful transitions into stable housing

<sup>2</sup> The Lodge on Dawson is a partnership between St Joseph's Care Group, the TBDSSAB, St Joseph's Foundation of Thunder Bay, Dilico Anishnawbek Family Care, and Alpha Court.

chronic homelessness. This is an 81% increase in HNH applicants in the last two years<sup>3</sup>. In addition, 36.8% (487) of applicants self-reported their housing status as homeless, which is a 5% increase over the last two years.

- In the District of Thunder Bay's homelessness By-Name List (BNL) 887<sup>4</sup> individuals are actively homeless, and 61% (537) self-reported as Indigenous. Homeless individuals in the district experience disproportionately high incidences of poor mental health and addiction. In the 2024 Thunder Bay Community Point in Time Count<sup>5</sup>, 80% of participants reported ongoing substance use and 61% reported having a mental health condition. Additionally, opioid-related deaths in Northwestern Ontario occur at a rate almost four times (52 per 100,000) compared to the province (13.8 per 100,000)<sup>6</sup>.

Given these statistics, without appropriate support and adequate funding for supportive housing, individuals experiencing homelessness, and possibly living with mental health and/or addictions, have a much lower likelihood of moving along the housing continuum. Through additional COCHI-OPHI funding, the TBDSSAB will be able to fund the completion of the outstanding units in the proposed housing project and explore further development opportunities.

The total cost of the 18-unit housing project is \$4,600,000, which is an average new unit construction cost of \$255,555. This is well below the average new construction cost in the market. Our housing partner is contributing 25% towards the total cost of the project and is looking to receive funding for 75% of project costs. Based on the current contributions, an additional \$2,108,334 is needed to ensure that the project receives adequate funding to help towards completing the construction of the full 18 units. At a provincial investment of \$191,667 per unit, this is excellent value for the creation of 18 new supportive housing units.

Therefore, TBDSSAB requests that the MMAH provide additional funding of \$2.1 million, through COCHI-OPHI 2025-26 residual funds to enable the support of continued development of the new 18-unit housing project. The completion of this proposed housing project would allow TBDSSAB continue to meet its mandate of providing homes for people in need.

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<sup>3</sup> HNH waitlist was at 54 applicants in September 2023

<sup>4</sup> This number is reported as of April 2025. It is not entirely accurate as reporting after October 2024 shifted from HIFIS to excel sheets.

<sup>5</sup> Lakehead Social Planning Council, Thunder Bay Indigenous Friendship Centre, Lakehead University, and Thunder Bay District Health Unit (2024) <https://infograph.venngage.com/pl/jWe8WLXZHI?flipBook=1>

<sup>6</sup> The Thunder Bay District Health Unit (2024) Opioid Information System. <https://www.tbdhu.com/opioidinfo>



THE DISTRICT OF THUNDER BAY  
SOCIAL SERVICES ADMINISTRATION BOARD

# Social Assistance Benefits Eligibility for Clients Entering Residential Treatment Facilities

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## POSITION PAPER

**January 2026**

**Rural Ontario Municipal Association (ROMA) Conference**

Prepared by:

The District of Thunder Bay Social Services Administration Board

Prepared for:

Hon. Michael Parsa, Minister of Children, Community and Social Services

Hon. Sylvia Jones, Minister of Health

## Brief

The District of Thunder Bay Social Services Administration Board (TBDSSAB) requests that the Ministry of Children, Community and Social Services (MCCSS) and the Ministry of Health (MOH) consider amending the Ontario Regulation 261/06 directives section 47.1 regarding the budgetary entitlements for clients entering Residential Treatment Facilities (RTFs).

## Summary

The current O. Reg. 216/06, 7., section 47.1 that relates to financial entitlements for persons admitted to programs for the treatment of substance use are often counterintuitive to successful outcomes. These directives have a negative impact on individuals who do not maintain housing in the community, outside of them receiving the Personal Needs Allowance (PNA).

For some Ontario Works (OW) recipients residing in a ministry funded RTF<sup>1</sup>, this often leads to ineligibility, and in turn, a loss of benefits. In the District of Thunder Bay, we have found that a proportion of TBDSSAB's OW clients fall into this categorization. Many individuals admitted to RTFs in the City of Thunder Bay are experiencing homelessness or at risk of homelessness. In addition, many of these individuals are facing mental health conditions and substance use concerns. Therefore, the most at-risk clients may lose access to 'mandatory benefits', leaving them in a more vulnerable state than before admittance to the facility seeking treatment. Under the previous Addiction Services Initiative (ASI), OW clients who did not have housing in the community, would maintain eligibility and qualify for OW benefits while they were in treatment. With the end of this initiative, these clients were no longer eligible to maintain eligibility.

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<sup>1</sup> These facilities are usually funded by the Ministry of Health and Long-Term Care (MOHLTC)

## Background

Until July 2019, TBDSSAB managed an ASI site and provided ongoing supports for clients with substance issues. Operating under the respective Acts - Ministry of Community and Social Services Act and Ontario Works Act - all clients maintained OW eligibility while they attended treatment in an RTF. For OW clients who did not have housing in the community, and attended a MOHLTC funded facility, they were granted entitlement calculated based on subtracting Personal Needs Allowance (PNA) from the Basic Needs Allowance (BNA). In doing so, the OW client would maintain eligibility and qualify for mandatory and discretionary benefits including the Ontario Drug Benefit program. Since the ASI program ended in 2019, TBDSSAB adopted the current Ontario Work's legislation, which has left many clients without access to these benefits.

Under the OW Act, the amended O. Reg. 261/06, section 47.1 provides an administrator the ability to reduce the budgetary requirements for "members" who reside in a treatment facility. In addition, the current OW directive 6.1 outlines the budgetary entitlements for clients participating in an addiction treatment program within an RTF. Applicants for this program, who satisfy all eligibility requirements, may receive an amount for basic needs and shelter (to maintain an existing residence in community housing) where room and board are provided by the facility without additional charges<sup>2</sup>.

Multiple conditions exist if a client maintains accommodation outside the facility or not. For instance, if a client is entering a treatment facility that is covered by the MOHLTC, and maintains housing in the community, they can receive the full amount of OW assistance for three months<sup>3</sup>. Additionally, clients with housing outside the facility, whose treatment is not covered, are eligible to receive the amount for board and lodging from OW to cover costs.

However, when a client enters an RTF, and does not have housing in the community, the total assistance they receive from OW is set at, or reduced to, the PNA amount of \$149. If the client enters a facility that is funded through the MOHLTC, the ministry automatically allocates the PNA<sup>4</sup>. In this case, since the client received PNA through the funded RTF, they cannot receive PNA funding from OW<sup>5</sup>.

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<sup>2</sup> The other requirement includes the recipient receiving the Ontario Works board and lodging rate where room and board are charged by the facility. Government of Ontario (2024). 6.10 Persons in residential programs for the treatment of substance abuse. <https://www.ontario.ca/document/ontario-works-policy-directives/610-persons-residential-programs-treatment-substance-abuse>.

<sup>3</sup> After three months, their budgetary requirements will be redetermined based on length of stay and plans to return to their principal residence.

<sup>4</sup> The type of RTF that a client enters is based on space, referral, and supports available.

<sup>5</sup> This means that they are no longer eligible for OW, and lose access to any mandatory or discretionary benefits (i.e. drug, dental, vision, medical transportation, etc.) they previously had.

In addition, the PNA allowance is not often issued directly to the client but issued to the facility that uses it to purchase items on behalf of the client. This arrangement is usually at the detriment of the client. For example, in October 2023, an OW client appealed directive 6.1 to the Social Benefits Tribunal (SBT)<sup>6</sup> as they lost benefits upon admission into an MOHLTC facility. They argued that the regulation should be interpreted so that the client was eligible for assistance for the first three months in treatment, calculated as BNA-PNA. The client reported that the treatment facility did not provide for all their basic needs, and therefore, should not have influenced their eligibility. Their appeal was denied, as SBT deemed the individual ineligible because their board and lodging was funded, and received PNA. Despite the decision, this situation highlights clients' frustrations with the legislation, and clients' loss of agency as they reside in RTFs. Outside of this instance, a broader example of loss of benefits is evident in one of the ministry's funded RTFs.

Crossroads Centre is a recovery home for addictions in the District of Thunder Bay and is funded by the MOHLTC<sup>7</sup>. For clients who have no community housing and are temporarily residing in Crossroads, they are left with no OW assistance and cannot apply for OW benefits until they leave<sup>8</sup>.

The legislation perpetuates a lack of access to necessary benefits for people experiencing homelessness and are living with mental health conditions and/or addictions. In the District of Thunder Bay, the rate of homelessness continues to increase, as 887 individuals are reported as actively homeless<sup>9</sup>. Rates of mental health conditions and substance use are disproportionately high among homeless individuals as the 2024 Thunder Bay Community Point in Time Count<sup>10</sup> reported that 80% of participants reported ongoing substance use and 61% reported having a mental health condition. This population needs ongoing access to support, without fear of being ineligible for OW benefits.

To address this growing situation, we request that the MCCSS and MOH revisit the legislation to ease the current constraints. We believe by addressing this concern, DSSABs and CMSMs are better enabled to support those most at-risk with benefits while they attend RTFs and transition out of treatment.

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<sup>6</sup> SBT Decision Case # 2206-02607 <https://www.canlii.org/en/>

<sup>7</sup> They offer 24/7 support with 20 beds for clients whose treatment ranges from a few weeks to a few months.

<sup>8</sup> The treatment facilities are not a long-term plan for clients, especially for clients who have no outside housing. Clients attending MOHLTC funded RTFs who have housing accommodation outside of treatment can receive full OW funding, however, clients who do not are being cut from OW and losing out on extra supports that they require.

<sup>9</sup> Based on April 2025 TBDSSAB By-Name List. Data is not entirely accurate as reporting after October 2024 shifted from HIFIS to excel sheets.

<sup>10</sup> Lakehead Social Planning Council, Thunder Bay Indigenous Friendship Centre, Lakehead University, and Thunder Bay District Health Unit (2024) <https://infograph.venngage.com/pl/jWe8WLXZHI?flipBook=1>

Therefore, TBDSSAB requests that the MCCSS and the MOH amends the O. Reg. 261/06, section 47.1 directive that relates to the budgetary entitlements for clients entering a MOHLTC funded facility with no community residence, so they can maintain their Ontario Works benefits.

District of Nipissing  
Social Services  
Administration Board



Conseil d'administration  
des services sociaux  
du district de Nipissing



THE DISTRICT OF THUNDER BAY  
SOCIAL SERVICES ADMINISTRATION BOARD

# Supporting the Maintenance of the Urban Native Housing Units

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## POSITION PAPER

**January 2026**

**Rural Ontario Municipal Association (ROMA) Conference**

Prepared by:

The District of Nipissing Social Services Administration Board and  
The District of Thunder Bay Social Services Administration Board

Prepared for:

Hon. Rob Flack, Minister of Municipal Affairs and Housing

## Brief

The District of Nipissing Social Services Administration Board (DNSSAB) and The District of Thunder Bay Social Services Administration Board (TBDSSAB) request that the Ministry of Municipal Affairs and Housing (MMAH) considers providing additional and distinct funding to the current allocation of the Canada-Ontario Community Housing Initiative (COCHI) that would enable DNSSAB and TBDSSAB to continue supporting the maintenance and development of Urban Native Housing (UNH) units.

## Summary

COCHI funding has been crucial for DNSSAB and TBDSSAB to be able to provide affordable housing for our communities, including supporting capital projects, repairs and maintenance, housing supplements, and homelessness prevention. COCHI guidelines also require that Urban Native Housing (UNH) units are effectively preserved, ensuring adequate housing affordability with no net loss of units. For 2025/26, DNSSAB is using 39% of its COCHI allocation to support UNH units, while they make up less than 5% of the total housing portfolio at 4.8%. The TBDSSAB is using 36% of its COCHI allocation to fund units which make up approximately 8% of its community housing portfolio. Additional and distinct funding would allow both DSSABs to support the ongoing maintenance of UNH units in each district, which would continue to provide culturally appropriate, safe, and affordable housing for Indigenous peoples.

## Background

The National Housing Strategy funding streams, such as COCHI, has become critical for both DSSAB's effective provision of community housing. COCHI funding has been used to protect affordability for households in community housing, to support the repair and renewal of existing community housing supply, and to expand the supply of community housing over time. In the past five years, the funding allocation has been central to the capital repairs in DNSSAB's area for nearly 1,600 units and in TBDSSAB's area for over 2,900 housing units.

COCHI has also helped DNSSAB support 85 existing legacy housing units and TBDSSAB support over 270 existing legacy housing units under the UNH program, up to March 31, 2026. The UNH program<sup>1</sup> assists Urban Native non-profit housing corporations to meet their housing needs by providing subsidized housing units, as well as supportive and transitional housing for Indigenous peoples.

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<sup>1</sup> The program is administered on behalf of the federal government by Canada Mortgage and Housing Corporation (CMHC).

The number of UNH units DNSSAB has supported has also significantly increased. In 2021/22, 15 units were supported. In 2024/2025 the number increased to 55. In the current year, 2025/26, the DNSSAB is supporting 85 UNH units through the COCHI allocation. The final 15 UNH units expire in 2028. The total amount of funding allocated to support the units is \$621,511, which amounts to 39% of DNSSAB's COCHI funding.

The number of UNH units TBDSSAB has supported has also significantly increased over the last six years. In 2019/20 10 units were supported. In 2024/25, the number increased to 118. In the current year, 2025/26, the TBDSSAB is supporting 153 UNH units through the COCHI allocation. The total amount of funding allocated to support the units is \$1,216,000, which amounts to 36% of TBDSSAB's COCHI funding<sup>2</sup>.

There are three UNH providers in Nipissing, including Ontario Aboriginal Housing Services (OAHS) which is operating units formerly named as Native People of Nipissing, Whispering Pines, and Waakohnsuk, for a total of 100 units. All of these units are funded through DNSSAB.

The Native People of Thunder Bay Development Corporation (NPTBDC) is one of the non-profit housing sponsors that receives COCHI funding from the TBDSSAB. Currently, NPTBDC owns and operates 240 housing units, 144 of which are funded by TBDSSAB. The Geraldton Native Housing Corporation (GNHC) owns and operates 33 units, 30 of which are now funded through TBDSSAB. Both organizations provide safe and affordable homes for Indigenous families and seniors in the District of Thunder Bay by offering low-end market rent units, and rent geared to income units.

As indicated in the Urban, Rural, and Northern Indigenous Housing Strategy<sup>3</sup>, culturally appropriate housing, such as the housing units in Nipissing and Thunder Bay, is necessary for Indigenous people who face heightened discrimination, stigmatization, and higher rates of homelessness. Compared to other municipalities in the province, the Nipissing District had 48% of those surveyed in the 2024 Point-in-Time (PiT) count identify as Indigenous, with Indigenous people making up 14.5% of the population of Nipissing District, while the District of Thunder Bay has a higher proportion of Indigenous people (16.2%)<sup>4</sup>. Additionally, 61% of individuals on the TBDSSAB homeless By-Name List self-reported as Indigenous<sup>5</sup>. Therefore, housing solutions designed and managed by Indigenous owned corporations are necessary to provide safe and culturally appropriate options for Indigenous peoples in the Districts of Nipissing and Thunder Bay.

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<sup>2</sup> The total COCHI allocation for the DNSSAB amounts to \$1,590,700 and TBDSSAB amounts to \$3,370,000 for 2025/26 year(s).

<sup>3</sup> Canada Mortgage and Housing Corporation 2023. CMHC.ca/IndigenousHousingStrategy.

<sup>4</sup> Statistics Canada. 2021 Census of the Population.

<sup>5</sup> This number is reported as of April 2025. It is not entirely accurate as reporting after October 2024 shifted from HIFIS to excel sheets.

Given these statistics, through continued dedicated funding support, Indigenous housing corporations will be equipped with the resources to assist Indigenous peoples across the housing continuum and match them with culturally appropriate services. The DNSSAB and TBDSSAB are committed to working with its UNH program partners, such as OAHS/NPON, Whispering Pines, Waakohnsuk, NPTBDC and GNHC, to maintain the current housing units post agreement expiry. Additional funding would not only assist in the long-term maintenance of UNH units, but also in the development of additional supportive and transitional units for Indigenous peoples.

Therefore, the DNSSAB and TBDSSAB requests that the MMAH provide additional and distinct funding to support the ongoing maintenance and development of Urban Native Housing units in the Nipissing District and the District of Thunder Bay.