


# Rent Geared-to-Income Training Session



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April 28, 2025

# Agenda

- Welcome
- Legislative Overview
- Eligibility and Housing Offers
- Program and HIP Policy Overview
- Types of Reviews (Annual and In-year)
- RGI Decisions & Service Manager Appeals
- Case Studies/ Examples
- Wrap Up



# Acronyms and Terms

HSA – Housing Services Act

O. Reg – Ontario Regulation

RGI – Rent Geared-to-Income

Service Manager – Region of Peel

Local Rules/ Standards – Housing in Peel (HIP) Policies

RTA – Residential Tenancies Act

CCA – Co-operative Corporations Act

LTB – Landlord and Tenant Board. Powers are authorized by the RTA

Tenant – a person(s) with rights to a residential unit governed under the RTA

Member – a person(s) with rights to a residential unit in a Co-operative



# What is the Housing Services Act (HSA)?

The HSA is a Provincial legislation that provides a community-based planning and delivery of housing and homelessness services with general Provincial oversight and policy direction and to provide flexibility for Services Managers and housing providers



# Regulation Changes

On September 23, 2019, the Ministry announced a number of regulation changes to the HSA. The key areas of change were:

- Refusal to Offer a RGI Unit (September 23, 2019)
- Provincial Rules on Refusal of Offers, Selection and Overhoused (January 1, 2021)
- Tenant Transfers Between Providers (Not adopted)
- RGI Simplification (July 1, 2021)



# HSA Regulations

REGULATION	TITLE
<b>HSA, O. Reg 316/19</b>	<b>Determination of Geared to Income Rent under Section 50 of the Act</b>
<b>HSA, O. Reg 367/11</b>	<b>General Regulation</b>
HSA, O. Reg 368/11	List of Designated Housing Projects
HSA, O. Reg 369/11	Subsidies for Part VII Housing Projects
HSA, O. Reg 370/11	High Needs Households & Household Income Limits (HILs)



# Ontario Regulation 316/19

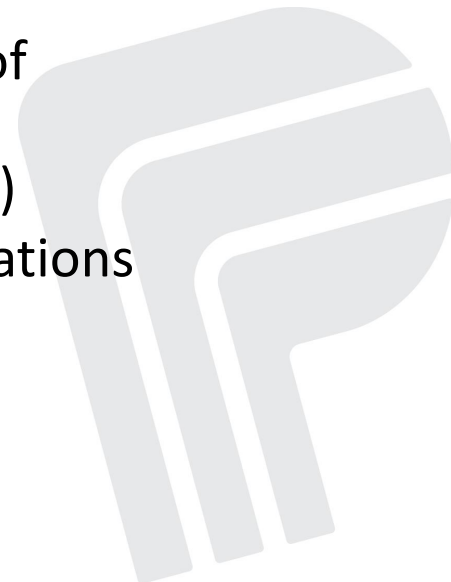
- This regulation replaced 298/01
- Provides an overview on the determination of RGI
  - How to calculate rent (section 2.1, 6)
    - Annual reviews (section 10)
    - Mid-year reviews and effective dates (section 11)
  - What is employment income (section 7)
  - What is minimum rent (section 2.3-7)
  - Difference between a benefit and family unit (section 3 & 5)
  - OW/ODSP rent scales (tables 1, 2 & 3)

<https://www.ontario.ca/laws/regulation/r19316#BK10>



# Ontario Regulation 367/11

- This regulation provides an overview of the following;
  - Eligibility rules incl. citizenship, money owed to a housing provider (section 23-27)
  - Cessation of eligibility incl. failure to provide information, obtain income... etc. (section 28-41)
  - Setting local rules: housing in peel polices
  - Centralized waiting list criteria incl. special priority rules (section 42-58.1)
  - Notice of decisions, continued eligibility, timing of reviews...etc (section 59-61)
  - Service manager appeal procedures (section 138)
  - Many more regarding building governance, operations finances...etc





# Ontario Regulation 317/19 and 367/11

- These regulations are related. 317/19 amended 367/11 in the following ways;
  - Cessation of eligibility – failure to notify of changes: Income Tax Reassessment
  - Cessation of eligibility – failure to file tax returns
  - Cessation of eligibility – period or normal rent: paying market rent for a period of 24 months
  - Inclusion of income and asset limits

<https://www.ontario.ca/laws/regulation/110367#BK50>



# Local Rules: Housing in Peel (HIP) Policies

- The HSA stipulate that the Service Manager will create local rules/standards to further detail legislative process and procedure or use discretion to create additional policies.

<https://www.peelregion.ca/housing/providers/policies-procedures/>



# Discretion

The HSA and HIP policies are not all encompassing therefore several areas of discretion are available.

When using discretion, it is important that we use our best judgement and try to think of the overall intention of RGI simplification. Items to consider:

- Intention of tenant/member
- Best interest of the tenant/member
- Other policies that may provide guidance in similar situations



**QUESTIONS?**



# General Eligibility Information



# Centralized Waiting List (CWL)

**The CWL is organized in the following way;**

- Priority
  - Victim of Family Violence (VOFV)
  - Victim of Human Trafficking (VOHT)
  - Terminally Ill – 2 years
- Chronological – based on application date



# Centralized Waiting List (CWL)

**In order to qualify for the CWL an applicant must provide proof of or disclose their;**

- Canadian Status
- Income
- Assets
- Home Ownership
- Provincial Arrears Database

**Once on the waiting list, the HSA requires all applicants be reviewed for continued eligibility every 2 years**



# Income Limits

## Income Limits – Applicable to Waitlist

- The limits are based on the Household Income Limits (HIL's) published annually by the Ministry in O. Reg. 370/11
- The limits are based on unit size. The 2025 limits are:
  - Bachelor Unit - \$56,000
  - 1-bedroom Unit - \$67,500
  - 2-bedroom Unit - \$77,000
  - 3-bedroom Unit - \$82,500
  - 4+ bedrooms Unit - \$82,500





# Asset Limits

## **Asset Limits – Applicable to Waitlist and RGI Households**

- Individual Limit - \$50,000
- Family Limit - \$75,000

## **Examples of assets include:**

- Bank balances
- Investments (excluding RRSP, RESP, RRIF)
- Home Ownership

In the event of joint assets, the total value is divided equally between owners unless percentage of ownership is stated in the applicable verification document.

**OW and ODSP Recipients are exempt from asset limits under the new amendments**



# Divestment of Residential Property

- Applicant are required to **disclose ownership** in any residential property within or outside of Canada when applying for the centralized waiting list (CWL)
- Once housed, a household **must divest** themselves of the residential property **within 6 months**
- Providers should **evaluate extenuating circumstances** that may not allow a household to divest and **review the exemption every 6 months**
- Transferred assets has been removed from legislation

# Provincial Arrears Database

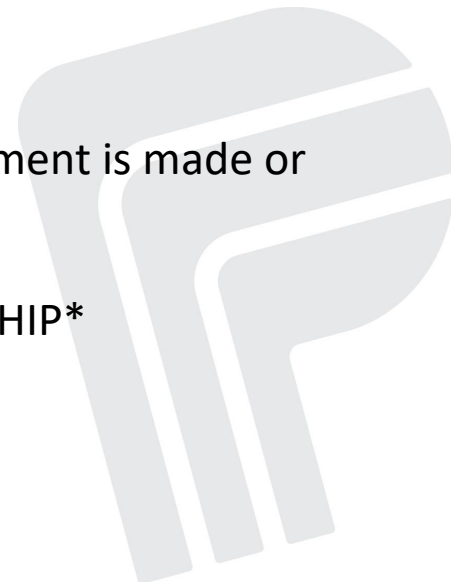
A previous tenant who has moved out, with arrears, of any housing provider within the province can be added to the provincial arrears database. Clients on the database do not qualify for housing until the arrears are repaid or an agreement is reached between both parties.

The database is checked before an applicant is sent to a provider and when an existing tenant wants to add someone to their household

Provider can report rental arrears, legal fees, utilities and damages to the database. Providers are responsible to

- Complete the [Arrears move-out/ repayment plan form](#)
- Keep record (incl. pictures) of all charges indefinitely
- Update the file when a repayment agreement is reached, a payment is made or when there is a default

\*Please reference Arrears owed to a Housing Provider HIP\*



# Provincial Arrears Database

## Checking Database for Eligibility:

- New move-in
  - The waitlist completes this step prior to sending Providers a new applicant(s)
- Adding someone to an existing household
  - Providers need to e-mail the waitlist worker and cc their Housing Specialist
  - Include the persons' name, date of birth and SIN (if you have it)



# Occupancy Standards – Unit Size

**Applicants are entitled to a bedroom for;**

- Couples
- Each subsequent person in the household

Ex: parents with 2 daughters = 3-bedroom unit

Main applicant, sister and child = 3-bedroom unit

Single parent with 1 daughter and 1 son = 3-bedroom unit



# Occupancy Standards – Unit Size

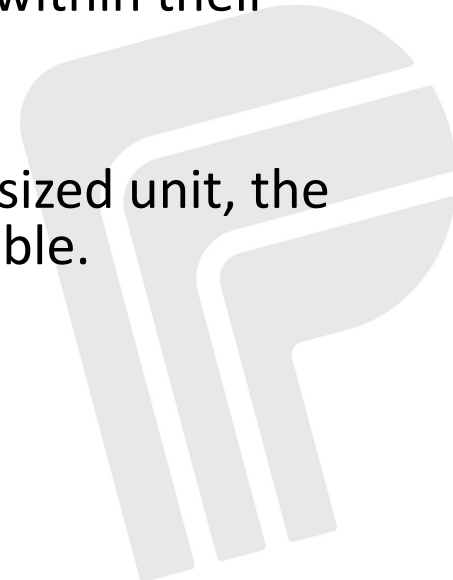
**Overhoused** –living in a unit larger than what you may qualify for.  
This is NOT a priority on the centralized waitlist

Ex: single parent 1 child = 3 bedroom

**When a household is deemed overhoused housing providers must;**

- Notify the household of their overhoused status and inform them that they must move to an appropriately sized unit within their current housing provider.

If the housing provider does not have an appropriately sized unit, the household must move to the smallest unit that is available.

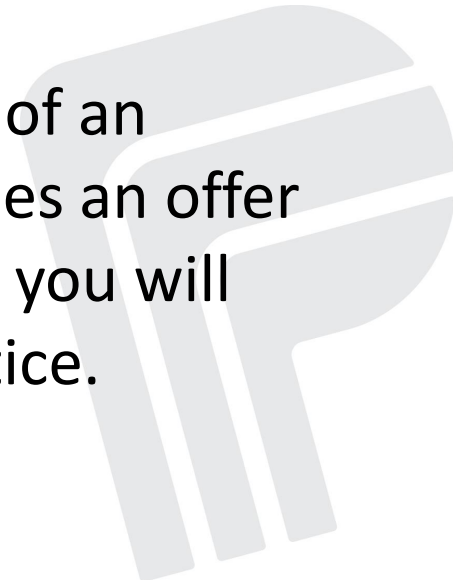


# Overhoused Status cont'd

## Offers made to Overhoused Households

- Any offers made within the first 12 months of overhoused status will not count
- Any offer made after the first 12 months of overhoused status will count

Overhoused households are entitled to 1 offer of an appropriately sized unit. If the household refuses an offer after the first 12 months of overhoused status, you will need to send them a cessation of eligibility notice.



# Occupancy Standards – Unit Size

**Underhoused** –living in a unit smaller than what you may qualify for. This is not a priority on any waitlist.

Applicants can voluntarily choose to underhouse themselves but if/when they want a larger unit they will not receive any priority for the transfer

Peel does not have any policy regarding age limits for room sharing even if the children are not the same sex

Ex: single parent 2 children (1 boy and 1 girl) = 2 bedroom





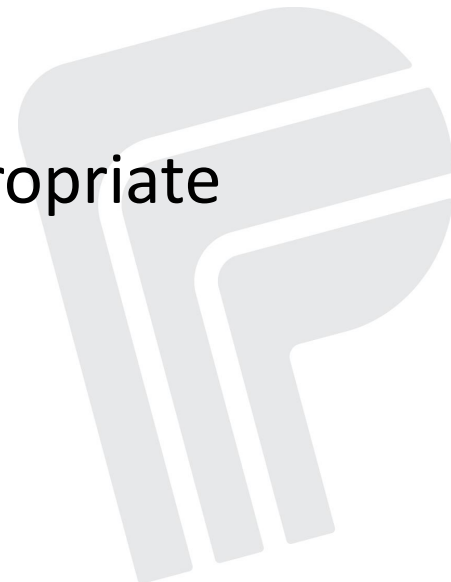
# Unit Offers

## **Building Selection**

- Applicants must select a minimum of 1 building
- Wait time for housing can significantly change based on selection(s) made

## **One offer**

- Applicants are entitled to one offer of appropriate housing from a previously selected building



# Unit Offers Cont'd

## **Reasons a provider can refuse housing;**

- If applicant owes money to another Housing Provider
- Provider has a mandate that the applicant does not qualify for
- The provider is a Co-op and the applicant has indicated that they will not fulfill their obligations as a Co-op member
- The applicant is unable to live in shared accommodations
- The applicant has disclosed that they were evicted through the LTB on an N6 in the last 5 years



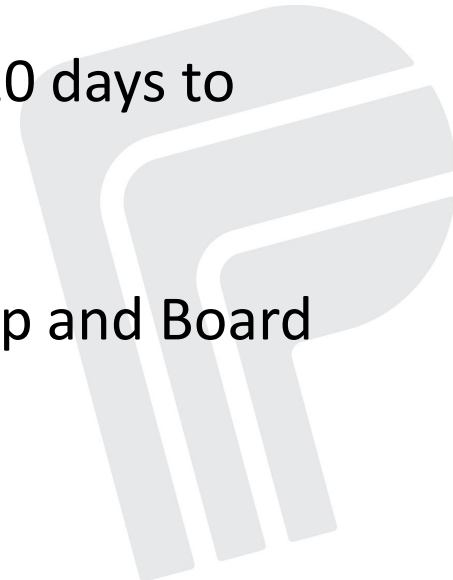
# Unit Offers Cont'd

## Offer and Notification Timelines

Once a Provider has contacted/ attempted to contact an applicant, the applicant has;

- 2 days to contact the provider and arrange to view the unit
- Upon viewing the unit applicant has 5 days to provide all documentation required to verify eligibility and accept/refuse the unit
- Upon acceptance of the unit the applicant has 10 days to sign the lease

\*\*\*Timelines for Co-op's differ due to membership and Board approval process\*\*\*



# Refusals

- When an applicant refuses a unit/fails to respond to the Provider, they previously selected, they are deemed ineligible and removed from the wait list. This decision is appealable
- When a landlord refuses an applicant, the applicant remains on the waiting list. The landlord must inform the applicant in writing of their decision and keep record of the refusal for 7 years

# NEW Placement Process

Version Date: April 2, 2025

## Standard Vacancy Template

### Instructions

- This is a reminder to report any Former tenant Arrears.
- Part #1 must be completed for all units.
- If you answer yes to the Modified unit question. Complete Vacancy Template Modified units Part #2.
- If you answer yes to Medical Modification, **list the modifications**.
- If no unit Air Conditioning is installed, indicate if you allow clients to install portable A/C.
- Send the completed template to [ZZG-Housingsupplyreps@peelregion.ca](mailto:ZZG-Housingsupplyreps@peelregion.ca) with subject line 'Vacancy CWL'
- Once the unit is updated, the provider will be contacted by the Integrated Waiting List Worker with the next CWL client.

### Vacancy Template Part #1:

- **Project # & Name:**
- **Unit #:**
- **Provider Name:**
- **Notice to Vacate Date received:**
- **Tenant Responsibility Date:**
- **Move-out date:**
- **Date unit will be ready for viewing:**
- **Type of unit:** Family or Senior
- **Modified Unit: Y or N (If yes, complete part #2)**
- **Number of bedrooms:**
- **Availability Date:**
- **Is Parking available currently: Y or N**
  - **Parking Yes:** above-ground or below ground
  - **Parking charge:** \$
- **Medical Modification:** (i.e., **Grab Bars or Strobe Lights**) Y or N
- **Balcony:** Y or N
- **Pets Allowed:** Y or N
- **Carpet:** Y or N
- **Unit Air Conditioning Installed:** Y or N
  - **If no, are Portable A/C allowed?** Y or N
- **Utilities Included:** Y or N
- **Utilities Extra:** (List the utilities)
- **Market Rent:**

### Vacancy Template Modified Units Part #2:

- **Wheelchair Accessible Parking:**
- **Accessible Parking with Access Aisles for Convenient Transfer:**
- **Does the Entrance have Ramps?**
- **Are there any Stairs that Restrict Full Access to the Unit?**
- **List all Restricted Access Points:**
- **Kitchen: Lower Countertops:**
- **Kitchen: Roll Under Countertops:**
- **Kitchen: Split Fridge- Freezer on One Side:**
- **Kitchen: Accessible Stove and Oven:**
- **Bathroom: Roll-In Shower:**
- **Bathroom: Grab Bars:**
- **Bathroom: Roll Under Sink:**
- **Lower Light Switches/Outlets/Thermostat:**
- **Unit Automatic Door Opener:**
- **Wider Doorways (36 inches wide):**
- **Open Concept Kitchen (i.e. gallery style, L-shaped)**
- **360-degree Turn Radius in the Bathroom:**

**QUESTIONS?**



# Program and HIP Overview



# Difference between Family and Benefit Units

## Benefit Unit

- A household member(s) that are in receipt of OW or ODSP (always confirmed via drug card or letter)

## Family Unit

- All other household composition types

\*\*\*It is possible to have both a family and benefit unit, 2 family units or 2 benefit units in a single unit\*\*\*





# Child of the Household

- Someone who has always lived at home, is not married and does not have any children living with them.
- Children of the household are;
  - Part of a family unit
  - No age limits
  - Do not need to be in school



The number of people listed on the drug card will indicate the number of beneficiaries within the benefit unit

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# Ontario Works Benefit Unit

OW Rent Scale for benefit unit with a recipient with no spouse and one or more dependents.

<b>Benefit unit size (number of individuals)</b>	<b>Rent attributable to benefit unit (monthly)</b>	<b>Non-benefit income limit (monthly)</b>
2	191	791
3	226	907
4	269	1,051
5	311	1,191
6	353	1,331
7	396	1,474
8	438	1,614
9	480	1,754
10	523	1,897
11	565	2,037
12 or more	607	2,117

# Ontario Works Benefit Unit

OW Rent Scale for benefit unit with a recipient with:

- Single recipient, recipient with spouse and no dependents and recipient with spouse and dependents

Benefit unit size (number of individuals)	Rent attributable to benefit unit (monthly)	Non-benefit income limit (monthly)
1	85	360
2	175	737
3	212	861
4	254	1,001
5	296	1,141
6	339	1,284
7	381	1,424
8	423	1,564
9	466	1,707
10	508	1,847
11	550	1,987
12 or more	593	2,131

# Ontario Disability Support Program

## Benefit Unit

### ODSP Rent Scale

Benefit unit size (number of individuals)	Rent attributable to benefit unit (monthly)	Non-benefit income limit (monthly)
1	109	440
2	199	817
3	236	941
4	278	1,081
5	321	1,224
6	363	1,364
7	405	1,504
8	448	1,647
9	490	1,787
10	532	1,927
11	575	2,071
12 or more	617	2,211

# In Receipt of Both ODSP and CPP-D

## ODSP Basic Needs Allowance

# of Dependents	# of Dependents 18 years+	# of Dependents 0-17 Years	Recipient	Recipient & Spouse (1 disabled)	Recipient & Spouse (both disabled)
0	0	0	\$786	\$1,134	\$1,569
1	0	1	\$786	\$1,134	\$1,569
1	1	0	\$1,219	\$1,355	\$1,790
2	0	2	\$786	\$1,134	\$1,569
2	1	1	\$1,219	\$1,355	\$1,790
2	2	0	\$1,441	\$1,602	\$2,037

For each additional dependent, add \$248 if the dependent is 18 years of age or older, or \$0 if dependent is 0 – 17 years of age.

Rates can be cross references: <https://www.ontario.ca/document/ontario-disability-support-program-policy-directives-income-support/61-basic-needs>

# Utilities

If landlord pays all utilities the charge added to a calculation is;

1 bedroom = \$30

2 bedroom = \$43

3 bedroom = \$50

4+ bedroom = \$53

If tenant pays partial/all utilities, then you need to use HSA utility scales to determine charge/allowance added at end of calculation. Utility scales can be found O. Reg 316/19 table 4-8.

<https://www.ontario.ca/laws/regulation/r19316#BK8>

# Minimum Rent

- Minimum rent increased to \$139 effective July 1, 2024
- Any tenants/members paying the phased in minimum rent will have their rent/housing charged increased to \$125 as of July 1, 2024
- OW and ODSP rent scales are not changing and will not be affected by the minimum rent
- Minimum rent will increase July 1<sup>st</sup> of each year regardless of when your annuals are or when the rest of the rents/housing charges increase
- Minimum rent is not an appealable decision





# Minimum Rent

## Social Assistance and Utility Allowances

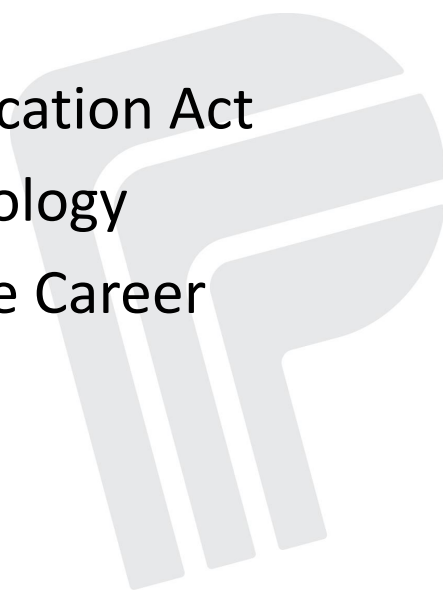
	Ontario Works	Ontario Disability Support Program
Scale (1 beneficiary)	\$85.00	\$109.00
Utility Allowance	-\$75.00	-\$75.00
	\$10.00	\$34.00
<b>Amount Charged</b>	<b>\$85.00</b>	<b>\$109.00</b>
Scale (2 beneficiary)	\$191.00	\$199.00
Utility Allowance	-\$75.00	-\$75.00
	\$116.00	\$124.00
<b>Amount Charged (Min Rent)</b>	<b>\$139.00</b>	<b>\$139.00</b>

# Tenants Attending School Full-time

All non-benefit income from a tenant/member/occupant attending school full-time at a recognized educational institution is now exempt

- No age limit

## Recognized educational institution

- A school or private school, as defined in the Education Act
  - A university or college of applied arts and technology
  - A private career college, as defined in the Private Career Colleges Act, 2005
- 

# Employment Deductions

Employment related income receives a deduction of;

- \$75 for any family unit with one person
- \$150 maximum for any family unit with more than one person

If there are two separate family units within the same household, the total deduction for the entire household may exceed \$150



# Doubled GAINS Payment

Qualifying seniors received doubled GAINS payments

- 2021 doubled for 6 months
- 2022 doubled for 6 months
- 2023 doubled for 12 months

GAINS can be found on line 14500 – Social Assistance line of the T1 General / Income Statement or by requesting the T5007.

For any calculations using 2021-2023 NOA/T1 General, divide the GAINS amount by 2



# Pursuit of Income

During **annual review** should a tenant/member declare they have no income, the Housing Provider will issue a 30-day Pursuit of Income notice.

Tenants/members/occupants can be asked to pursue;

- Ontario Works(OW)
- Spousal Support
- Employment Insurance (EI) Benefits
- Senior Benefits (OAS, GIS, GAINS)
- Support from a Sponsor for a Sponsored Immigrant



# Absence from Unit

Household occupants receiving RGI cannot be absent from their unit for longer than

- 60 days consecutive or
- 90 days within any 12 consecutive month period

Our HIP policy does allow for extenuation circumstances such as:

- Incarceration - while awaiting trial
- Medical – emergencies or treatment occurring outside of the geographical area



# Opportunity to Comment

When a provider receives 3<sup>rd</sup> party information or requires clarification regarding an issue that may affect a household's eligibility for RGI subsidy, they should issue an opportunity to comment notice.

The opportunity to comment notice is a 30-day notice and providers can make a discretionary decision depending on the response received from the household and the documentation they have to support the claim.

An opportunity to comment notice may be issued for a variety of reasons;

- household composition, income, assets, breaches of lease or membership agreement, illegal activities...etc.



# In-Year Reviews

Housing Providers will complete mid-year reviews under the following circumstances;

- Adjusted Family Net Income (AFNI) has decreased by 20% or more (can only be requested by a Household **once** between annual reviews)
- A permanent change in household composition has occurred
- During a review, the Provider issued a Pursuit of Income notice
- Income taxes have been reassessed





# Notification of Changes

Tenant/members are still required to report changes in income and/or household composition within 30 days.

Housing Providers will review the information received and determine if a mid-year review is required and inform the tenant/member, in writing, of their decision.

Tenants/members do not have to report changes in income that result in an increase unless outlined in the following slide.



# In Situ Priority Changes

## **NEW Criteria**

- Market tenant(s)/ member(s)
- Living in a qualified unit based on Peel's Occupancy Standards HIP
- No previous subsidy violations or subsidy loss due to voluntary removal or non-compliance
- No current arrears (repayment agreement may be signed)
- Resided with current provider for at least 24 months
- Significant and unexpected change in circumstances that is likely to be permanent and resulted in monthly shelter costs that are more than 50% of households gross income
- Housing provider must be below RGI target

# In Situ Priority Changes

## **Simplified Approval Process**

- Review in-situ eligibility with household
- Complete a full eligibility review (income and asset)
- Review RGI target
- Email the Housing Specialist with all supporting documents and confirm target vs actual RGI
- Housing Specialist will review, make a final decision and inform the Housing Provider via email
- If approved, the effective date will be the month following the approval
- Email notice of decision to Housing Specialist

# How to Convert Income into Monthly and/or Annual Factors

Paid	Annual Amount	Monthly Amount
Weekly	Multiply by 52	Multiply by 4.333
Bi-weekly	Multiply by 26	Divide by 2 & multiply by 4.333
Semi-monthly	Multiply by 24	Multiply by 2
Monthly	Multiply by 12	----
Quarterly	Multiply by 4	Divide by 3
Annually	----	Divide by 12

**QUESTIONS?**



# Types of Reviews



# RGI Calculations

## RGI Simplification

- A new framework in calculation RGI largely based on Line 23600 of the Notice of Assessment
- Although the regulatory changes were meant to simplify the RGI calculation process, it also provided several opportunities for Service Manager discretion
- This regulation change was implemented on July 1, 2021



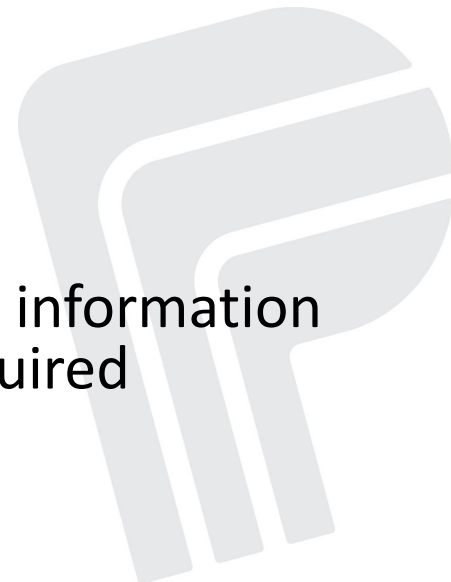
# All Annual Calculations Begin the Same

Send notification of Annual review and request the following documents;

- NOA
- T1 General/ Income Statement (Recommended)
- Declaration of income forms
- Social assistance statement and confirmation of beneficiaries
- Confirmation of full-time school
- Confirmation of assets

Cross reference NOA and declared income

If information is incorrect or missing, send missing information letter outlining the specific documents required





# Adjusted Family Net Income (AFNI)

**AFNI is the combined monthly income of all household members excluding those attending school full-time**

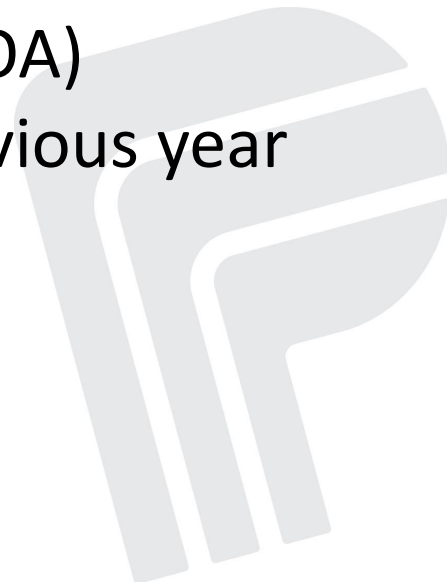


# Tax-Based Net Income (TBNI)

## When to use Tax-Based Net Income?

This method is used **annually** to calculate RGI for anyone with fixed or stable sources of income such as pension, long-term employment, ODSP... etc.

Line 23600 of the Notice of Assessment (NOA) represents the net income made in the previous year but is NOT net of income tax deductions



# TBNI: What Documents are Required

All tenant/members/occupants over the age of 16 must provide;

- Notice of assessment (NOA)
  - Annuals taking place between January-June will use 2023 NOA
  - Annuals taking place between July-December will use 2024 NOA
- T1 General / Income Statement (Recommended)
- Declaration Forms (RGI forms)
  - Should be signed and filled out by the household
- Social Assistance Statement and Confirmation of Beneficiaries
- School Confirmation
- Asset confirmation: Bank Summary, T-slips



# TBNI: Line 23600 Tax Return

## Income included in line 23600

- Employment (including commission, tips, EI...etc)
- Self Employment
- Pension (Foreign and Domestic)
- Social Assistance (OW and ODSP)
- Interest/Dividends from Investments

Child Support is no longer an included income as it does not appear on line 23600



# TBNI: Line 23600 Tax Return

## **Income deduction allowed in line 23600**

- Registered Pension Plan
- Employment Expenses
- Union Dues
- Etc.



# TBNI: Line 23600 Tax Return

## Excluded income in line 23600

- Income listed on line 12500 (Registered disability savings plan) must be excluded from line 23600

**Example:** In order to determine the TBNI the Housing Providers reviews the T1 General and notices \$1,500 listed under line 12500 and \$20,000 under line 23600.

$$\begin{array}{rclclcl} \text{Line 23600} & - & \text{Line 12500} & = & \text{TBNI} \\ \$20,000 & - & \$1,500 & = & \$18,500 \end{array}$$

# TBNI: Line 23600 Tax Return

## Income in line 23200

- Income listed on line 23200 (other deductions) must be explored further to determine if the deduction is for registered disability savings plan (RDSP) repayment.

**Example:** If it is confirmed that the deduction is for RDSP repayment, the amount must be added back into line 23600

<b>Line 23600</b>	<b>+</b>	<b>Line 23200</b>	<b>=</b>	<b>TBNI</b>
\$20,000	+	\$1,500	=	\$21,500

# TBNI Calculation: Bob Example

Bob lives alone in a 1-bedroom unit where the landlord pays all utilities

- Declaration of income forms state Bob currently makes \$2,250 per month
- Line 23600 (NOA) states Bob made \$25,500 in 2024

To confirm TBNI calculation is required multiply Bob's declared monthly income by 12 ( $\$2,250 \times 12 = \$27,000$ )

As line 23600 and the declared income are in the same 'ball-park', use TBNI to calculate





# TBNI Calculation: Bob Example

NOA Line 23600 = \$25,500

$\$25,500 / 12 = \$2,125$

$\$2,125 - \$75 \text{ (employment deduction)} = \$2,050$

$\$2,050 \times 30\% = 615 \text{ (rounded)}$

$\$615 + \$30 = \$645$

**Monthly RGI Rent/ Housing Charge = \$645.00**




**QUESTIONS?**



# Approximated Net Income (ANI)

## When to use ANI?

This method is used when;

- The TBNi calculation does not accurately reflect the household member(s) projected income for the next 12 months
  - A mid-year calculation was completed since the last annual review
  - If the income reported on line 23600 is different from the declaration of income forms (discretion should be used in these cases)
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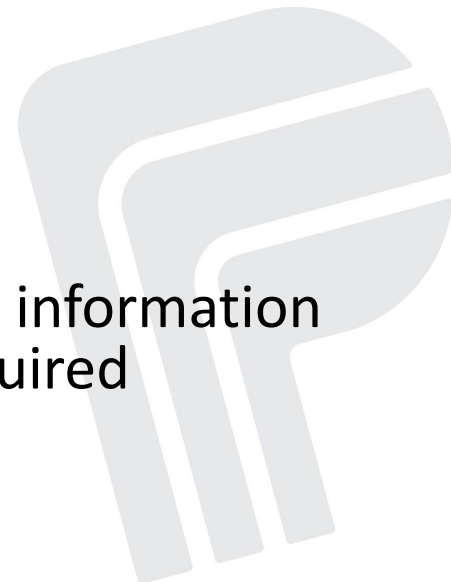
# All Annual Calculations Begin the Same

Send notification of Annual review and request the following documents;

- NOA
- T1 General/ Income Statement (Recommended)
- Declaration of income forms
- Social assistance statement and confirmation of beneficiaries
- Confirmation of full-time school
- Confirmation of assets

Cross reference NOA and declared income

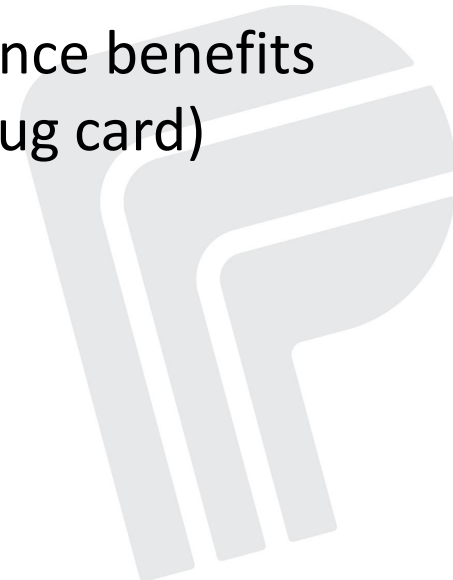
If information is incorrect or missing, send missing information letter outlining the specific documents required



# ANI: What Documents are Required

All tenant/members/occupants over the age of 16 must provide;

- Notice of Assessment
- T1 General / Income Statement (Recommended)
- Letter from employer/8 weeks of consecutive paystubs or Year-to-Date\*
- Service Canada statement for OAS, GIS, CPP or EI
- Statement from WSIB, private pension or insurance benefits
- Statement and confirmation of beneficiaries (drug card) from OW or ODSP
- School Confirmation
- Asset confirmation: Bank Summary, T-slips



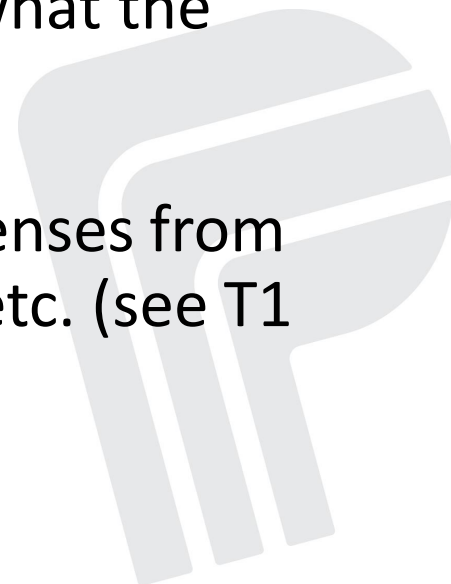
# ANI: What Documents are Required

## IMPORTANT

**ANI calculations are based on GROSS income not NET income**

Line 23600 of the NOA is not net of income tax deductions while net income on a paystub is. Gross income on a paystub is a more accurate representation of what the income on next years NOA will be

Remember to deduct reimbursements for expenses from gross income. Example: gas, meals, mileage... etc. (see T1 General example)

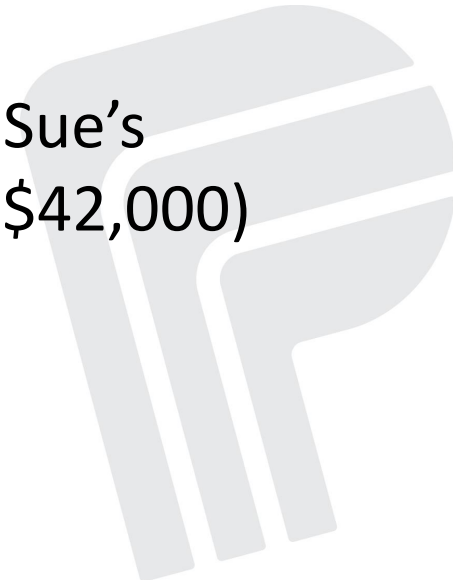


# ANI Calculation: Sue Example

Sue lives with her 8-year-old daughter in a 2-bedroom unit where the landlord pays all utilities

- Declaration of income forms state Sue currently makes \$3,500 per month
- Line 23600 (NOA) states Sue made \$20,000 in 2024

To confirm ANI calculation is required multiply Sue's declared monthly income by 12 ( $\$3,500 \times 12 = \$42,000$ )



# ANI Calculation: Sue Example

## Documents required from Sue

- Received
  - NOA
  - T1 General / Income Statement (Recommended)
  - Declaration of Income Forms
  - Bank summary
- Missing information
  - 8 weeks of consecutive paystubs, employment letter or YTD\*





# ANI Calculation: Sue Example

Add all paystubs and divide by the number of weeks

Multiply average weekly income by 4.333 to determine AFNI

$\$3,500 - \$150 \text{ (employment deduction)} = \$3,350$

$\$3,350 \times 30\% = 1,005 \text{ (rounded)}$

$\$1,005 + \$43 = \$1,048$

**Monthly RGI Rent/ Housing Charge = \$1,048.00**



**QUESTIONS?**



# **Notice of Decisions & Service Manager Appeals**



# Notice of Decision Effective Dates

## Increases and Decrease Due to Income

- Annual Review: the month following the notice
- Mid-year Review: the month following the change

## Increase to Market Due to Income (RGI on Hold)

- Follow the above effective dates
- Household is counted as part of the RGI target
- Household remains eligible for **24-months** from the effective date



# Notice of Decision Effective Dates

## **Ineligible for Subsidy: Due to;**

- Failure to provide information or file tax returns
- Failure to report changes
- Failure to divest of residential property
- Failure to obtain income
- Refusal to comply with Overhoused occupancy standards
- Absence from unit
- Assets above allowable limit

**Effective 90-days from the date the notice of ineligibility  
is issued**



# Notice of Decision Letters

**All notice of decision letters must include the following;**

- Names of all tenants/members
- Reason for decision, be specific
- Effective date of the decision
- Right to a Service Manager Appeal and how to appeal
- Who to contact with questions
- Signature (wet or electronic)



# Effective Dates vs Fiscal Year Start

## Important Reminder

**RGI administration and a housing providers fiscal year does not always match**

Once all documents are received from the household, providers must calculate and send a decision letter within 30 days.

If your fiscal year starts May 1<sup>st</sup> and you calculate a households annual review in February the decision should be effective March 1<sup>st</sup> not May 1<sup>st</sup>.



# Service Manager Appeals

## What is appealable

- Applicant is denied priority status on the waitlist
  - VOFV, VOHT, terminally ill
- Applicant is made ineligible for the waitlist
  - Asset limits, income limit, refused a unit, failure to submit annual verification
- Applicant is refused unit size or accommodation requested by the waitlist
  - Additional bedroom, wants a unit facing south-east
- Tenant is made ineligible for RGI subsidy
  - See previous slides





# Service Manager Appeals

## What is not appealable

- Voluntary removal from RGI
- Rent is too high due to other expenses
  - car payment, insurance, child support, student loans...etc
- Annual minimum rent increase
- Parking dispute with landlord



# Service Manager Appeals

## Timelines

Applicant/tenant must submit appeal within 30 calendar days from date of notice received

Once appeal is received the Appeal Specialist must complete within 15 business days

*\*Use discretion\**



**QUESTIONS?**



# Case Studies/ Examples



# Scenario 1: Self Employment

During an annual review, a member informs you they are self-employed, the business operates in cash and has been open for 4 months.

Member will need to provide you the following for an ANI calculation

- [New business form](#) attached to the 'Income and asset verification' HIP
- Bank statements showing the cash deposits



## Scenario 2: In-year Review

Tenant lives alone and works full-time. They inform you that they started school full-time. Would you complete an in-year review?

Yes but why?

Non-benefit income of full-time student is exempt.  
Going to minimum rent would likely be considered a 20% decrease



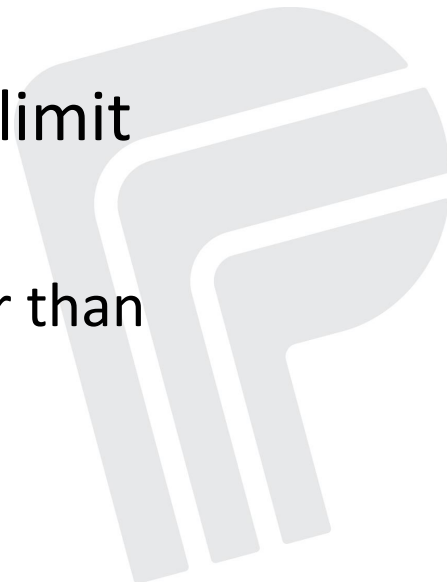
# Scenario 3: Backdating a Notice of Decision

When can you backdate a notice?

- The tenant/member fails to report a required change within 30 days
- An administrative error occurs

Is there a time limit for backdates?

- Administrative errors do not have a time limit
- Failure to report requires discretion
  - Consider if you should pull the subsidy rather than backdate the decision



## Scenario 4: In Situ

Market tenants have lived in the building for 15 years. Are involved with the community and well liked. Both tenants retired in 2024.

Do they qualify for an in-situ if their income has significantly decreased?

Was retirement an unexpected change in circumstances?

Discretion



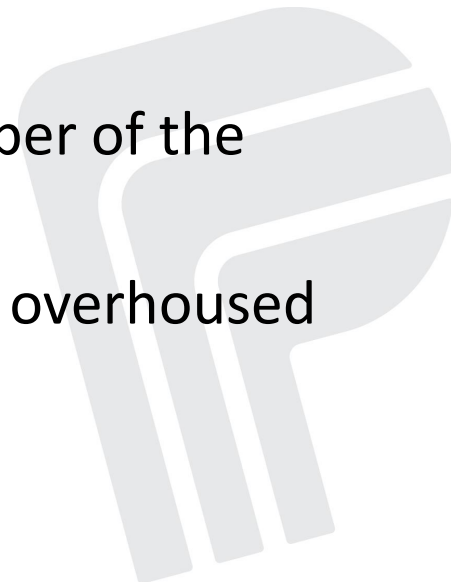


## Scenario 5: Overhoused

Member lives by themselves in a 4-bedroom unit and has been overhoused and on the centralized waiting list for a 1-bedroom unit for 5 years.

Provider is a townhouse complex and the smallest unit is 2 bedrooms. What do you do?

- During next annual review you inform the member of the change in HIP policy
- Place them on your internal transfer list with an overhoused priority



## Scenario 6: Underhoused

Situation 1- tenants voluntarily underhoused themselves in a 2 bedroom unit when they qualified for a 3 bedroom.

Situation 2 – at move in 5 years ago, tenants were appropriately housed in a 1-bedroom unit but have had 2 children in the last 3 years.

How is each situation handled?  
The same? Differently?



# Scenario 7: Provincial Arrears Database

When are you responsible for confirming/updating the provincial arrears database?

- Addition to an existing unit/household
- Update arrears at move-out
- Update when an arrangement is made or a payment is missed



# Scenario 7: Provincial Arrears Database

## Continued

Do you have to confirm an arrears repayment is in good standing during annual reviews?

Yes

What can you ask for?

- A signed letter from the previous landlord on letterhead
- Call the landlord directly



## Scenario 8: Opportunity to Comment

Single person living in 1 bedroom unit. During unit inspection there are 3 people in the unit who inform you they live there. You see several mattresses on the floor surrounded by personal belonging.

Do you need to issue an opportunity to comment?

No



## Scenario 9: Asset Limit Exceeded

When do you confirm asset limits?

Initial move in and during annual review

Can you pull a subsidy if asset limit is exceeded?

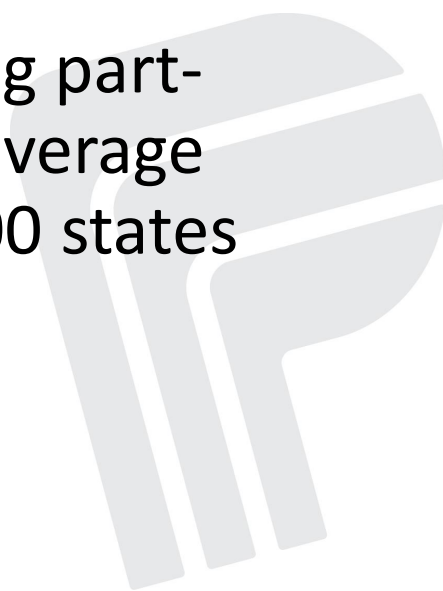
Yes

Should discretion be used?

Yes



## Scenario 10: TBNI Example

- 2 tenants living in a two-bedroom unit, all utilities paid by landlord
  - **Tenant A** works full-time and has been employed at the same place for 3 years. Declaration of income forms state average monthly income is \$2,750, NOA line 23600 states \$32,000
  - **Tenant B** is in school full-time and working part-time. Declaration of income forms state average monthly income is \$1,200, NOA line 23600 states \$12,000
- 

# Scenario 10: TBNI Example

1) Send Annual Review package and request all documents

2) Cross reference declared income with NOA

## **Tenant A**

- NOA Line 23600: \$32,000
- Declared Income:  $\$2,750 \times 12 = \$33,000$
- Within the same ball-park therefore move forward with line 23600

## **Tenant B**

Confirm full-time school status and deem income to not be included





# Scenario 10: TBNI Example

**Tenant A:** NOA Line 23600 = \$32,000

$$\$32,000/12 = \$2,666.67$$

$$\$2,666.67 - \$150 \text{ (employment deduction)} = \$2,516.67$$

$$\$2,516.67 \times 30\% = 755 \text{ (rounded)}$$

$$\$755 + \$43 = \$798$$

**Monthly RGI Rent/ Housing Charge = \$798.00**



## Scenario 11: TBNi and ANI

- A couple living in a 1-bedroom unit, all utilities paid by the landlord
- Both tenant A & B are receiving a pension of \$20,400 (each) as per their NOA and declaration forms
- **Tenant B** has recently started a part-time job and listed \$600 as their average monthly income on their Declaration of income form



# Scenario 11: TBNI and ANI

1) Send Annual Review package and request all documents

2) Cross reference declared income with NOA

	Tenant A	Tenant B
Line 23600	\$20,400	\$20,400
Declaration Forms	$\$1,700 \times 12 = \$20,400$	$\$2,300 \times 12 = \$27,600$
	Within 'ball-park' = TBNI	Outside 'ball-park' = ANI

Housing Provider will send a missing information letter to Tenant B requesting 8-weeks of consecutive paystubs

# Scenario 11: TBNI and ANI

## Tenant B:

Add all paystubs and divide by the number of weeks

- $\$1300 / 8 = \$162.50$

Multiply average weekly income by 4.333 to determine monthly average income

- $162.50 \times 4.333 = \$704.11$

Add employment income and pension income (found on line 23600)

- $\$704.11 + \$1,700 = \$2,404.11$



# Scenario 11: TBNI and ANI

## Combine incomes from Tenant A & B

- $\$1,700 + \$2,404.11 = \$4,104.11$

$\$4,104.11 - \$150 \text{ (employment deduction)} = \$3,954.11$

$\$3,954.11 \times 30\% = \$1,186 \text{ (rounded)}$

$\$1,186 + \$30 = \$1,216$

**Monthly RGI Rent/ Housing Charge = \$1,216.00**



## Scenario 12: TBNI & Social Assistance

- Three people living in a 3-bedroom unit, tenant pays their own utilities therefore a utility allowance of \$126 is applied to their calculation
- **Tenant A** is in receipt of Ontario Works which lists all three residents on the drug card. Works part-time and has declared making \$500 per month.
- **Tenant B** is a 17 years old, in school full-time and works part-time
- **Occupant A** is a 14 years old child in school full-time



# Scenario 12: TBNI & Social Assistance

- 1) Send Annual Review package and request all documents
- 2) Cross reference declared income with NOA

## **Tenant B**

Confirm full-time school status and deem income to not be included

## **Occupant A**

Below 16 years old



# Scenario 12: TBNI & Social Assistance

## Tenant A

- NOA Line 23600: \$16,680
- Line 14500: \$10,680 (Social Assistance Line)
- Declared Income: OW 3 beneficiaries  
Employment \$500 x 12 = \$6,000

Housing Provider will subtract line 14500 from 23600 to confirm the non-benefit income (employment income) included in NOA

$$\$16,680 - \$10,680 = \$6,000$$

As declared income and non-benefit income included in NOA are the same Housing Provider can move forward with TBNI



# Scenario 12: TBNI & Social Assistance

## Tenant A

Confirmed information:

- In receipt of OW, 3 beneficiaries
  - Scale = \$226, Income Threshold = \$907
- Employment Income = \$500

Housing Provider compares the monthly income to the OW income threshold and since the income is below the threshold, move forward with a regular benefit unit calculation using OW rent scales

## Scenario 12: TBNI & Social Assistance

OW 3 beneficiaries	\$226
<u>Utility allowance</u>	<u>\$126</u>
Difference	\$100

As \$100 is below the new minimum rent, the rent/housing charge is increased to \$139

**Monthly RGI Rent/ Housing Charge = \$139.00**



## Scenario 13: Social Assistance & Student

- Single parent living in a 3 bedroom unit with 2 children (10 and 7 years old)
- Parent is in school full-time
- OW recipient

Is this household charged minimum rent or OW rent scale for 3 people?



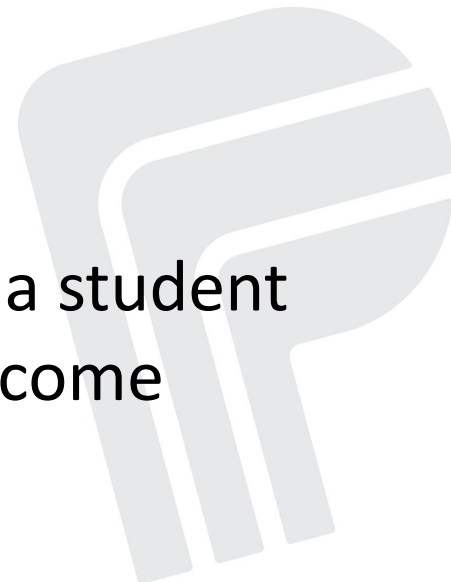
## Scenario 13: Social Assistance & Student

Is this household charged minimum rent or OW rent scale for 3 people?

Answer: OW rent scale for 3 people

Why?

Only employment income is exempt from a student calculation. OW is not employment income



# Scenario 14: Transition from ODSP to Pension

- Senior living in a 1 bedroom unit
- Stopped receiving ODSP February 2024
- Began receiving OAS/CPP/GAINS February 2024

**What method would we use to calculate?  
TBNI or ANI?**



# Scenario 14: Transition from ODSP to Pension

## ANI

- Line 23600 is not an accurate representation of the next 12-month period
- You would need to request:
  - Pension statements indicating monthly CPP, OAS and GAINS payments

If there is a doubled GAINS payment listed, make sure to back it out of the calculation



**QUESTIONS?**



# Resources

- Housing Services Act, 2011 - <https://www.ontario.ca/laws/statute/11h06>
  - O. Reg. 316/19 - [O. Reg. 316/11: Determination of Geared-to-Income Rent](#)
  - O. Reg. 367/11 - [O. Reg. 367/11: General](#)
- Housing in Peel (HIP) Policies - [Policies and procedures - Region of Peel](#)





# Resources

- Ontario Non-Profit Housing Association (ONPHA)  
<https://www.onpha.on.ca/>
- Co-operative Housing Federation of Canada(CHF)  
<https://chfcanada.coop/>
- Peel Halton Co-operative Federation of Canada PH  
CHF)  
<https://co-ophousingpeel-halton.coop/>

