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April 20, 2023

The Honourable Ahmed Hussen
Minister of Housing and Diversity and Inclusion
180 Kent Street
Suite 1100
Ottawa, Ontario K1P 0B6

Dear Minister Hussen:

I am writing to you today on behalf of the Association of Municipalities of Ontario (AMO) about the housing priorities of Ontario and the potential of funding programs under the National Housing Strategy (NHS), including the Housing Accelerator Fund (HAF), to help meet the need.

Housing is a shared municipal-provincial funding and planning responsibility supported by the federal government. Investments in affordable housing supply, done in the most effective and efficient way, is an issue of deep concern to our members and the residents that our respective orders of government serve.

AMO has consistently and respectfully asked that the federal government continue the effort to increase investments under the NHS so that we can address the housing and homelessness crisis once and for all. Ensuring adequate housing for our most vulnerable and low-income residents is a moral and economic imperative.

While much progress has been achieved since the inception of the NHS, more is required with increased funding and a revised program design to ensure that those in greatest need are well served by federal programs. We did not see the investments that we were looking for in the recent 2023 budget to achieve this. Municipalities will only gain the ability to end homelessness and address the housing in Ontario with increased and targeted investments.

This includes continuing to escalate funding for the Rapid Housing Initiative, a critical program to quickly build community and supportive housing. A deeper subsidy and targeting of a new federal portable housing benefit for homeless people is being called for across the country. These tools and resources are essential to the shared federal and municipal goal of ending homelessness.

Lastly, Ontario experiences a higher degree of core housing needs comparatively to other provinces and territories. It is problematic that the NHS funding to the province does not reflect this reality. AMO continues to ask that allocations to Ontario be revised and increased, aligning with the outcomes sought by the federal government to reduce those in core housing need and be incorporated in the funding model.

On a related housing matter, AMO wanted to echo the concerns raised by the Federation of Canadian Municipalities (FCM) about the design of the HAF that, with tweaks, will make it even more successful.

AMO was pleased to see the program announced in March 2023 and that work is underway with the Canada Mortgage Housing Corporation (CMHC) to communicating out to potential applicants. However, municipal governments across Ontario are finding the application process to be strenuous, particularly in small and northern communities. In many cases, it has created unnecessary roadblocks that will prevent Ontario municipalities and communities from getting the support they need.

Generally speaking, the HAF program does not seem to reflect the unique structure of Ontario municipal governments and the important roles that the lower-, single-, and upper-tier municipal governments play along with municipal service boards.

Upper- and single-tier municipalities deliver transformative infrastructure needed to unlock housing supply, and single- and lower-tier municipalities in planning and permitting. As such, we are requesting that the program include regional governments and District Social Service Administration Boards (DSSABs) as eligible applicants. DSSABs are created under provincial legislation and are responsible for affordable community housing development and maintenance in northern Ontario. Without their involvement, the regional housing needs will not be met.

We also want to echo the FCM's recommendations, including:

- Extending the deadline for HAF submissions for both streams and/or allow for a rolling intake for municipalities that require more time to submit application requirements. While many municipalities may be ready, more time will allow for better collaboration and innovative solutions by leveraging partnerships that the current design does not allow time for.
- Making the requirement for large/urban municipalities to implement a minimum of 7 initiatives, and rural municipalities to implement a minimum of 5 as guidance, to a strict minimum requirement.
- Supporting scaling up and expanding existing initiatives currently underway by a municipality and not limiting to the implementation of new reforms.
- The creation of reporting and accountability outcomes that are streamlined, flexible and accessible to avoid placing undue burden on municipalities to ensure program success and best outcomes.

To enable conversations about how best to structure the HAF program and coordinate broader housing investments, AMO is recommending a re-convening of the Canada-Ontario-AMO-Toronto National Housing Trilateral Coordination Forum. It has been many years since the forum has met since being established with the Canada-Ontario bilateral agreement.

We thank you for your consideration and look forward to working with you to further our shared goals.

Yours sincerely,



Colin Best
President, AMO
Councillor, Region of Halton

cc: The Honourable Steve Clark, Minister of Municipal Affairs and Housing, Ontario
Kate Manson-Smith, Deputy Minister, Ministry of Municipal Affairs and Housing, Ontario
Udita Samuel, Ontario Regional Advisor, Office of the Prime Minister of Canada
Alan Ning, Advisor, Office of the Prime Minister of Canada
Chris Knipe, Regional Advisor for Ontario and Parliamentary Secretary Assistant, Office of the Minister of Housing and Diversity and Inclusion
Scott Pearce, First Vice-President and Acting President, Federation of Canadian Municipalities (FCM)
Karen Redman, Chair of Mayors and Regional Chairs of Ontario (MARCO)