

Date: Tuesday, May 28, 2024

**Report to:** Board of Directors

CityHousing Hamilton Corporation

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Manager, Strategy & Quality Improvement

CEO/Secretary Adam Sweedland

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Subject: Accessibility Update (Report #24017)

Report Type: Information

### Recommendation(s):

That Report #24017 Accessibility Report Update be **received** for information.

## **Executive Summary:**

At the November 28<sup>th</sup>, 2023, CityHousing Hamilton (CHH) Board meeting the Board of Directors received a presentation from the Advisory Committee for Persons with Disabilities (ACPD) with recommendations to improve accessibility at CHH buildings.

Report # Accessibility Report Update speaks to actions CHH has taken or is considering with respect to the recommendations.

# **Background and Additional Information:**

This report highlights what actions CHH has taken based on the ACPD Housing Group recommendations.



#### Recommendations:

1. CHH to create a department that focuses on accessibility.

#### Action:

In February 2024 CHH hired an Equity, Diversity and Inclusion (EDI) Specialist. This new position is responsible for developing an Inclusion, Diversity, Equity and Accessibility (IDEA) framework for tenants and staff. This will help to mitigate accessibility issues at properties and support tenants' individualized needs.

2. Tour CHH properties and list steps that need to be taken in a priority list to be addressed as labour and finances allow. This will ensure that money is allocated to improving accessibility.

#### Action:

CHH completes Annual Unit Inspections; the purpose is to visit each unit and inspect for any health, safety, or maintenance issues consistent with the landlord's obligation under subsection 20(1) or section 161 of the Residential Tenancy Act (RTA). During these inspections, tenants can discuss accessibility items and staff can outline next steps to addressing these individual requests.

CHH implemented a Duty to Accommodate policy in 2016. Tenants are accommodated based on their unique circumstances. To complement this policy, CHH has implemented a Unit Modification process which allows tenants to provide supporting medical documentation for accessible modifications based on individual needs e.g., grab bars, roll in shower, strobe lights etc. Once documentation is provided and approved, CHH works with approved contractors to complete modification work.

As part of its contractual commitment to CMHC through the Co-Investment Fund, CHH is obligated to improve the accessibility features for a minimum of 20% of its units. This can mean improvements to common areas, the addition of specific accessibility features (such as strobe light fire alarms or automatic door openers) and conversion of units (where possible) to meet barrier-free requirements. In addition, newly constructed housing includes an increase in accessible units and features to meet the needs of different household sizes.

3. Create a hotline/complaints system to provide necessary feedback as is required under the act.

# Action:



CHH has a complaint system in place which provides a variety of ways for tenants to have complaints addressed. Tenants can identify accessibility barriers or file complaints by:

email at <a href="mailton.ca">aoda@hamilton.ca</a>
complete the CHH complaints form on <a href="mailto:CHH's website;">CHH's website;</a>
submit paper form in person;
or speak directly to CHH staff.

Staff will reach out to tenants to collaboratively address solutions. CHH is currently developing a customer relations management system to streamline and support an improved complaint process. This technology enhancement will assist in tracking timely response, what action occurred and outcome. *Implementation time Q1 of 2025*.

4. Review the CityHousing website/application forms to ensure they are achieving full accessibility. This may require the development of testing protocols.

#### Action:

CHH's website is currently maintained by the City of Hamilton's communications department. This website aligns with the design and functionality of departments within the City of Hamilton (COH).

CHH is developing a strategic communications plan which will include a comprehensive review of its communication material (include the website) to ensure material is available in multiple formats to meet the accessibility needs of tenants. This will be included in the work led by CHH's EDI Specialist.

5. Review and modify the current system to request modifications in the home and serve as an intermediary between the tenant and the property manager.

#### Action:

Tenants can speak with their Property Manager or Tenant Support Worker to request individualized accommodations which may include home modifications. Once supporting documentation from medical professionals is obtained, CHH then organizes contractors to complete the work. Home modifications can include door closures, automatic door closures, wheelchair ramps, grab bars, fire alarm indicators for individuals with hearing loss, modifications to bathrooms and any other requests for modifications in the current unit.



Ontario's Human Rights Code requires landlords to accommodate the needs of tenants with disabilities to a reasonable point. Tenants can submit a complaint to CHH if they feel their accommodation has not been adequately met or addressed or can apply to the Human Rights Tribunal of Ontario.

6. Review any new construction or renovation plans to ensure they are addressing accessibility as well as trying to incorporate Universal Design, because it will save money over time.

#### Action:

The average age of a CHH property is 46 years. When these buildings were developed, they met building codes and regulations. As CHH replenishes or creates new developments, our design approach incorporates Universal Design and rigorous energy-based standards.

CHH is currently developing a socially sustainable 20-year long-term housing strategy for Hamilton that focuses on inclusivity, multigenerational living, mixed income housing, and community revitalization. CHH will engage tenants and stakeholders to ensure that Universal Design is incorporated in new construction and renovations.

7. Review each property's maintenance plans to ensure they are taking accessibility into full account.

#### Action:

CHH understands the importance of having an asset management plan that measures, analyzes replacement costs, age, condition, and overall quantity of assets. To address CHH's aging stock, we are developing a portfolio preventative maintenance and demand capital action plan and investing in technology solutions to enhance reporting and analysis to increase lifetime of assets. Additionally, with funds from CMHC (Canada Mortgage and Housing Corporation) CHH has earmarked work to improve accessibility within common spaces at properties.

8. Review accessibility training protocols and suggest improvements.

### Action:



CHH aligns with the City of Hamilton's training expectations. New hires must complete AODA related training including "Working Together- The Code and AODA" and "Accessibility Standards for Customer Service." Training explains how the Code and AODA guide the prevention and removal of barriers for people with disabilities.

The new CHH EDI Specialist is currently developing an Inclusive, Diversity, Equity and Accessibility (IDEA) framework for tenants and staff. The EDI Specialist is currently completing an environmental scan with staff on training protocols and suggestions to improve accessibility training. Tenant engagement will happen in Q4 of 2024 which will review current accessibility approaches and understand service gaps/opportunities.

9. Participate in Public Health's Extreme Heat Working Group as a representative of CityHousing and assist in updating the Community Heat Response Plan going forward.

#### Action:

Since February 2024 CHH has had two staff participating regularly in the Extreme Heat Working Group. Pertinent information from this working group is disseminated back to the organization.

10. Attend ACPD Housing Working Group meetings on a biannual basis to maintain regular communication channels.

#### Action:

The ACPD Housing Group over the last two years has collaborated with the Manager of Strategy and Quality Improvement at CHH and with City of Hamilton's Manager Diversity & Inclusion. CHH will continue to attend ACPD Housing Working Group meetings. Our mutual goals are to support the removal of barriers for people with disabilities.

# **Background and Additional Information:**

CHH believes the best way to achieve accessibility for tenants within units and properties is to have honest and inclusive dialogue to find solutions that work for both sides. Our goal is to work together in an environment where our policies and practices promote integration and full participation. CHH will continue to collaborate with the ACPD Housing Group, and tenants with lived experience to improve quality of life for individuals with accessibility needs.



CHH would like to acknowledge the ACPD Housing Group for the work they have done to develop these well-thought-out recommendations. The ACPD Housing Group spent the last two years learning how the Accessibility for Ontarians with Disabilities Act (AODA) affected housing and shared recommendations to CHH on how to improve accessibility.

### Consultation:

City of Hamilton: Human Resources, Talent and Diversity: Jessica Bowen- Manager Diversity & Inclusion.

# Financial and Legal/Risk Considerations:

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) became law in 2005. The AODA helps obligated businesses and organizations to identify, remove, and prevent barriers for people with disabilities.

CHH contributes to Annual Reports that highlight CHH's strategies, initiatives, and activities to reaching accessibility and delivering exceptional and accessible services. The plan documents the progress made during the year and sets out the measures and deliverables proposed for future years. CHH strategies align with the City of Hamilton's compliance with the Accessibility for Ontarians with Disabilities Act (AODA), 2005 and the Integrated Accessibility Standards (Ontario Regulation 191/11).

## **Next Steps and Milestones:**

December 2025: Develop a multi-year accessibility plan which addresses strategies to prevent/remove barriers. Will be posted on the CHH website under our new Accessibility section.

# **Strategic Alignment: change**

This report supports the following 2023-2027 CityHousing Hamilton Strategic Priorities:

- EMPOWER TENANTS WITH THE SUPPORT AND SERVICES THEY NEED TO THRIVE: Foster equitable, diverse, and inclusive communities within CHH
- PRESERVE AND UPGRATE CHH'S CURRENT HOUSING STOCK: Provide timely and responsive maintenance to CHH's portfolio.
- DEVELOP NEW AND INCLUSIVE AFFORDABLE MIXED HOUSING WHILE
  BUILDING STRONG AND SUCCESSFUL MULTI-GENERATIONAL COMMUNITIES:



Develop a socially sustainable 20-year long-term housing strategy for Hamilton that focuses on inclusivity, multigenerational living, mixed income housing, and community revitalization

Supporting Presentations and Appendices: N/A

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