

	Policy Type	Number	Title	Created	Revised
	Finance and Administration	FA P010	Internal Transfer Policy	August 2013	

## Policy Statement

It is the policy of Evangel Hall Residence to permit both rent-geared-to-income (RGI), and market rent tenants to transfer when appropriate units become available. Evangel Hall Residence will respond to all transfer requests in a fair, consistent and financially responsible manner.

## Purpose

The purpose of this policy is to:

1. allow Evangel Hall Residence tenants to move from one unit to another;
2. give priority to tenants who qualify as special priority, who are over-housed, or urgently need a different unit due to health or related grounds;
3. balance the needs of Evangel Hall Residence with the needs of people hoping to move into ehm housing for the first time; and
4. recognize ehm's limited financial and human resources.

## Scope

This policy applies to all ehm staff responsible for monitoring and facilitating the movement of tenants within the portfolio and to all tenants.

## Definitions

### ***Code-related***

A matter related to ehm's obligations under the *Human Rights Code, 1990*.

### ***Designated Staff***

The staff person(s) or department who has been designated to complete a particular action or requirement.

### ***Good standing***

A household that:

1. has not been given an eviction notice;
2. does not owe arrears or any other money to the non-profit (unless financial hardship has made this household a "priority move");
3. has paid its rent on time for the last six months;
4. has no history of damage to the unit, disturbing neighbours or harassing staff.

### ***Over-housed household***

An RGI household living in a unit which is larger than the largest unit for which they qualify under occupancy standards set by the City of Toronto (or the standards set out in Ontario Regulation 298/01).

### ***Priority moves***

Households that have an urgent need to move due to health concerns or significant change in financial or family circumstances. Examples of urgent needs include:

1. tenants needing to escape abuse but who have not lived with or been sponsored by the abuser and so do not qualify for special priority status, including tenants being threatened or harassed. The Residence Director will establish the level of documentation required to substantiate the abuse.
2. household members with a medical condition or permanent disability, and their current unit:
  - a. is inaccessible, or
  - b. substantially aggravates the condition, or prevents or substantially increases the cost of treatment(*Medical Confirmation for Internal Transfer* form required).
3. Financial hardship due to the loss of a partner, or a significant drop in income, that makes the market rent unaffordable (tenant requests move to unit with lower market rent).

### ***RGI***

The tenant's rent-geared-to-income subsidy.

### ***SHRA***

The *Social Housing Reform Act, 2000*

### ***Special Priority***

Status that is granted to a member of an applicant or tenant household, aged 16 years of age or older, who meets the criteria outlined in section 24 of Ontario Regulation 298/01.

### ***Evangel Hall Mission***

The organization whose board of directors has approved this policy.

### ***Under-housed households***

Households that have more than two household members per bedroom or who have opposite-sex household members, who are not spouses, sharing a bedroom.

## **Procedure**

### **Eligibility for Internal Transfer**

1. Any household in good standing may request a transfer after having lived in a unit for at least one year.
2. Households that are required to transfer because they are over-housed, have been granted special priority designation, or require Code-related accommodation are not required to meet

the non-profit's eligibility criteria. Staff may, at their discretion, waive ehm's eligibility criteria for priority transfers.

3. The SHRA also recognizes housing providers' limited financial and manpower capabilities. Each transfer will necessitate a redecoration/repair of the originally vacated unit and an additional redecoration/repair of the unit subsequently vacated by the tenant who transferred. Aside from special priority, over-housed or Code-related transfers, the number of transfers can be capped in the event that ehm is unable to complete the necessary repairs due to financial or human resource limitations.

### **Request for Internal Transfer (RGI)**

1. A household requesting an internal transfer must complete an *Internal Transfer Request* form and submit it to the management office.
2. A household that is applying for a transfer as a special priority household or as a result of a Code-protected disability must inform the Residence Director that they are seeking this status.

### **Ranking on Internal Waiting List**

1. Ehm's internal waiting lists will be comprised of multiple subsidiary lists. Each subsidiary list will be ranked by priority relative to other lists and the households on each list will also be ranked:

#### **Internal Waiting Lists - RGI Households**

- a. The non-profit's internal waiting lists for RGI households will be ranked as follows. The households waiting on each list will be added to the list and ranked according to the criteria of each list.
  - i. **Households with Special Priority designation**
    - A. Special priority households will be ranked chronologically by the date they applied for special priority designation.
  - ii. **Over-housed households**
    - A. Over-housed households will be ranked chronologically by the date that they applied for an RGI subsidy.
    - B. The Residence Director will automatically add any over-housed households to the internal waiting list, and will advise the household in writing.
  - iii. **Priority Moves (See Definition)**
    - A. Priority applicants will be offered units in order of their application date for a transfer.
  - iv. **Under-housed households**
    - A. Under-housed households will be ranked chronologically in the order they applied for a larger unit.

- b. When notice is given for a unit, the first appropriately sized household on the highest ranked list will be offered the unit. The unit will be offered to each appropriately sized household on a list before being offered to appropriately sized households on the next, lower priority, waiting list.

**Internal Waiting List - Special Needs or Modified Units**

- a. Households requesting a transfer to a special needs or modified unit will be required to provide an *Internal Transfer Request* form.
- b. The appropriateness of the unit for the household's needs will be assessed prior to adding the household to the internal waiting list. If the unit and/or support services are deemed to be appropriate, the household will be added to the internal waiting list. If the unit / support services are inappropriate, the household shall be referred to the coordinated access centre. The tenant will be advised of the result of the assessment in writing.
- c. Households on the special needs or modified unit internal waiting list will be ranked chronologically by the date that the non-profit received a completed application form.
- d. Households requesting a transfer to a special needs or modified unit will be referred to the service manager, who will determine whether or not to grant such designation. The tenant will be advised of the result of the assessment in writing.

## Completing an Internal Transfer

1. Maintaining Eligibility for Internal Transfer
  - a. Households must meet the following criteria in order to maintain their eligibility for an internal transfer:
    - i. there are no arrears;
    - ii. no late payments within the last 6 months;
    - iii. no substantiated complaints from neighbours or staff; or complaints from neighbours or staff that resulted in a Land Tenant Board Notice being served to the household; and,
    - iv. no damage (beyond regular wear and tear) to the tenant's unit was found in a unit inspection.
  - b. Prior to showing the unit to the next household on the internal waiting lists, the Residence Director will assess whether or not the household continues to meet the criteria for an internal transfer.

## Offering a unit

1. The Residence Director will offer a vacant unit to households on the internal transfer list in the order they appear on the waiting list.
2. The Residence Director may exercise discretion in the decision to offer a vacant unit to anyone on the internal transfer list other than special priority, over-housed and other priority transfer requests if the resources are not available to prepare the units that are vacated in a given month without incurring vacancy loss.
3. A household will have 24 hours to decide whether to accept the unit.
4. A special priority or over-housed household that refuses three offers while on the internal transfer (and/or the centralized waiting list) will lose their eligibility for RGI assistance.
5. A household (other than a special priority or an over-housed household) that refuses three units will be removed from the internal waiting list.
6. Units may be offered "as is." ehm will ensure the unit meets ehm's maintenance and safety standards and that all electrical and plumbing fixtures are in good working order. However, the non-profit may choose not to paint the unit, do minor patching, or make decorative changes to the unit.
7. Once the internal transfer has been approved, the transferring tenant will be required to sign an *Internal Transfer Agreement* to confirm their responsibilities and the details of the move.

## Swaps

1. Staff will identify possible swaps of households on the non-profit's internal transfer list. Swaps will preferably be made between overhoused tenant households and under-housed tenant households on the internal transfer list. Swaps are a means to address households' occupancy needs and to achieve more effective utilization of the housing stock.
2. Swaps will be conditional on acceptance of the unit in the condition it is in at the time of the swap ("as is"). However, this condition does not preclude the non-profit doing maintenance that would be done in any event (leaking taps, repairs to electrical components, etc.). Both tenants involved in the Swap must sign an *As Is Agreement*.

## Review of Decisions

1. Households can request a review of the decision to declare the household over-housed (as required by provincial regulations). Households may also appeal a decision to:
  - a. refuse a transfer request, or
  - b. refuse to give other priority status.
2. The non-profit shall follow the process outlined in the *Internal Review Policy*.