

### Recommendations Analysis

The following high-level analysis includes a breakdown of all 23 recommendations presented in the Project Summary Report. The proposed strategy recommendations presented in the report are listed in the first column of the charts below. The second column highlights the initial response from Administration regarding how each recommendation might be implemented.

Recommendations are divided into three charts, based on when they can be reasonably implemented: short-term (approximately 1 year), medium-term (1-2 years) and longer-term (2-5 years).

Administration supports all the proposed strategy recommendations. In some cases, Administration has proposed alternative actions to the recommendation to meet the intent of the recommendation more effectively or appropriately and to account for any limitations the City may have to implement in terms of authority or resources.

#### Short Term Implementation (1 year)

Recommendation as stated in the Project Summary Report	Response from Administration
<p>1. Improve awareness, transparency and access to available City-owned land and properties. One way of achieving this might be to designate sites specifically for Indigenous providers.</p>	<p><u>Current State:</u> Existing City Policy C437A, City Land Assets for Non-Profit Affordable Housing, is in alignment with this recommendation.</p> <p><u>Planned Actions:</u> Administration will develop and implement a process to improve awareness of Policy C437A. Administration will also investigate the feasibility of designating sites specifically for Indigenous housing providers.</p>
<p>2. The City advocate for improving access to existing funding and creating additional funding from other levels of government, including working with Indigenous governments, Indigenous housing providers or other Indigenous-led organizations to advocate for more housing resources for Indigenous-led developments</p>	<p><u>Current State:</u> The City has been active and will continue to support ongoing advocacy efforts with all levels of government for additional capital and operating funding to support Indigenous-led housing providers in Edmonton.</p> <p><u>Planned Actions:</u> The City will seek joint advocacy opportunities with other</p>

<p>from other orders of government.</p>	<p>municipalities and First Nations, both within the region and with other major cities across Canada. In the short-term, additional focus will be placed on opportunities to support our Indigenous housing partners in accessing and leveraging available funding through existing government funded programs.</p> <p>Some of these funding programs, with further details still to be announced, are further described below.</p> <p>The Federal Government through the Canada Mortgage and Housing Corporation (CMHC) recently announced \$724.1 million to expand supports for Indigenous women, children and 2SLGBTQIA+ people escaping gender-based violence, that will support transitional homes (in addition to shelters) across Canada. Indigenous Services Canada will invest \$304.1 million over five years and \$96.6 million annually to support the operational costs of new shelters and transitional homes, and expand funding for culturally-relevant violence prevention activities. CMHC has also recently announced the development of an Urban, Rural and Northern Indigenous Housing Strategy.</p> <p>In addition, a \$1.5 billion expansion of the Rapid Housing Initiative was recently announced to build 6,000 affordable homes starting in 2022-23.</p> <p>The Provincial Government, through their 2022 Budget, has committed \$40 million over 3 years through their Indigenous housing capital program.</p>
<p>3. The City advocate for collaboration and coordination in the housing sector among other levels of government and other funding bodies.</p>	<p><u>Current State:</u> The City actively engages other orders of government on collaboration opportunities. Both orders of government have signaled interests in strengthening collaboration opportunities.</p>

	<p><u>Planned Actions:</u> The City will pursue further opportunities to work with the Government of Alberta, Canada Mortgage and Housing Corporation, Indigenous Services Canada and Indigenous-led community organizations to leverage relevant programs and funding opportunities to the maximum extent possible. In doing so, the City will investigate coordination opportunities to improve access to the programs and services available from all governments and funding bodies in the housing sector.</p>
<p>4. The City advocate for access to or the creation of rent subsidy programs targeting Indigenous tenants. Such subsidies could be either direct to tenant or a specific development that would then provide the rent subsidies to residents who required such assistance.</p>	<p>The City recognizes the important role of rent subsidy programs, and is supportive of efforts to better support and target Indigenous tenants.</p> <p><u>Current State:</u> There is currently a provincial rent subsidy called the Rent Supplement Program (formerly the Direct to Tenant Rent Supplement). Eligibility is focused on income which falls below certain income thresholds.</p> <p><u>Planned Actions:</u> The City will continue to advocate to the provincial government to investigate options to improve rent subsidy programs to target Indigenous tenants.</p> <p>While not typical of municipal funding programs, the City will also explore the feasibility of rent subsidy programs at the municipal and federal levels to complement the provincial programs.</p>
<p>5. The City express support for moving towards creating a national Urban Rural and Northern (URN) funding stream and centre.</p>	<p><u>Planned Actions:</u> Administration will work with the federal government and Canada Mortgage and Housing Corporation to understand how the City can play an effective role in supporting Indigenous groups in Edmonton to</p>

	<p>access funding streams for an Urban, Rural, and Northern Indigenous Housing Strategy.</p>
<p>6. The City advocate for better Residential Tenancies legislation that addresses security of home (for tenants security of home means a place where they feel secure and know that they will not lose their home as a result of economic eviction, renoviction, their cultural practices, lack of maintenance, change of building ownership).</p>	<p><u>Planned Actions:</u> Administration will leverage existing communication channels and relationships with the province to raise security of home concerns for potential legislative consideration.</p>
<p>7. The City lobby the province for a program that would enable low income Indigenous homeowners and tenants with lower incomes to maintain and adapt their homes.</p>	<p><u>Current State:</u> There is currently a provincial program called the Seniors Home Adaptation and Repair Program (SHARP) which allows seniors to use their home equity to cover repairs, adaptations and renovations to their primary residence.</p> <p><u>Planned Actions:</u> Administration will leverage communication channels and relationships with the province to address this issue, with an aim to create a similar program with a broader eligibility which includes Indigenous homeowners, regardless of age.</p>
<p>8. Explore potential innovative financing arrangements (such as social bonds, social enterprise). Such exploration could include looking at innovative arrangements, what it would take to implement these</p>	<p><u>Planned Actions:</u> Administration will explore financing arrangement options in various ways. For example, Administration will explore opportunities to work with the Edmonton Community Foundation to expand the Social Enterprise Fund (SEF)</p>

<p>arrangements and who might be responsible for such implementation.</p>	<p>provided to Indigenous peoples through its Black, Indigenous and People of Colour (BIPOC) Grants, which are focused on engaging, empowering, building capacity, and increasing awareness about the organizations' positive impact in the community.</p>
<p>9. Ensure the inclusion of the diversity of Indigenous cultures and identities. It is important to understand the importance of cultural understandings and the different ways that First Nations, Metis and Inuit see/understand housing. An effective collaborative process must include the diversity of Indigenous identities among the broader Indigenous community including those not represented by existing Indigenous governance bodies.</p>	<p><u>Planned Actions:</u> Administration will explore ways to ensure the participation of Indigenous perspectives in the design of municipal affordable housing programs and projects. Administration will build out an ongoing engagement process to ensure the inclusion of the diversity of Indigenous representatives, cultures and identities in various projects.</p>
<p>10. Collaborate with existing housing researchers and organizations to undertake further research in the area of Indigenous housing in Edmonton, for example:</p> <ul style="list-style-type: none"> <li>a. Systemic discrimination and access to rental properties.</li> <li>b. Research on whether construction cost pricing is increased for Indigenous projects.</li> </ul>	<p><u>Planned Actions:</u> Administration will integrate into its future research program a specific focus on Indigenous housing, which could be carried out in collaboration with organizations in Edmonton and housing researchers. An invitation will be extended to Canada Mortgage and Housing Corporation to request their participation in this work.</p>
<p>11. Create communication tools on:</p> <ul style="list-style-type: none"> <li>a. The City's affordable housing development and approval process.</li> <li>b. Existing resources/funding, available land &amp; properties (ex.</li> </ul>	<p><u>Planned Actions:</u> Administration will develop a communications plan, which will be designed in collaboration with Indigenous individuals and organizations. The communications plan will be focused on ensuring awareness of the following areas, using</p>

<p>surplus schools) &amp; how to access them.</p> <ul style="list-style-type: none"> <li>c. Process for applying for funding</li> <li>d. Relevant Indigenous specific housing data.</li> <li>e. Create a listing of existing data and previous studies (with links).</li> <li>f. Public education on racism/discrimination/stereotyping in the housing sector including rental (landlords including non-profit landlords) and development (NIMBYism).</li> <li>g. Resources for residents to enable them to secure and retain their housing.</li> </ul>	<p>a variety of mediums (such as posting information online, dissemination of information both electronically and non-electronically):</p> <ul style="list-style-type: none"> <li>a. The City currently has a webpage on the development and approval process. This webpage will be reviewed to ensure the greatest degree of transparency, accessibility and ease of use for all users, including those with limited development experience.</li> <li>b. Policy C437A - City Land Assets for Non Profit Affordable Housing establishes the framework for non profit entities to access city land assets. Additional information will be posted online and disseminated in order to clearly outline and communicate this process.</li> <li>c. Additional information will be posted online and disseminated regarding the process to apply for funding.</li> <li>d. Administration is currently conducting a Housing Needs Assessment that includes consultation with Indigenous agencies and communities. Once completed, this will contain relevant Indigenous-specific housing data. The findings from this work will be published in both a report and as an online dashboard in the near future.</li> <li>e. Administration will explore ways to make existing data and studies more accessible.</li> <li>f. Administration will develop educational resources and link to existing educational tools on the rights of tenants and recourse options in the case of discrimination, racism and stereotyping.</li> </ul>
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	<p>g. Administration will develop training resources for residents on how to secure housing, in addition to resources for residents on how to maintain housing. Collaboration with community organizations who currently provide training on how to maintain housing would be a priority. Administration will also explore additional forms of support that would be beneficial to residents to help them maintain their housing.</p>
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## Medium Term Implementation (1-2 years)

Recommendation as stated in the Project Summary Report	Response from Administration
<p>12. Ensure access to programs for the exemption of property tax for Indigenous non-profit housing providers. Property taxes are potentially the largest component of the monthly operating costs. For example, the taxes on a property that is assessed at \$300,000 would be approximately \$230 per month so an exemption could provide a savings of \$2760.</p>	<p><u>Planned Actions:</u> The City will continue to advocate to the province to update legislation to ensure affordable housing providers, including Indigenous-led affordable housing providers, are clearly exempted from both municipal and provincial taxes.</p>
<p>13. The City work with the Province to ensure that the <i>Municipal Government Act</i> and Regulations include provisions for the exemption of Indigenous affordable housing from both municipal property tax and the education tax collected by the municipality on behalf of the province.</p>	<p><u>Planned Actions:</u> The City will continue to advocate the province to update legislation to ensure affordable housing providers, including Indigenous-led affordable housing providers, are clearly exempted from both municipal and provincial taxes.</p>
<p>14. Improve linkages between all relevant City departments that impact the development and delivery of community-based housing. One example of this could be collaboration between the housing and planning departments to expedite project approvals.</p>	<p><u>Current State:</u> There is currently a client liaison unit in the development services area that can work with any project proponent, including Indigenous affordable housing applicants, to ensure that the applications are processed as quickly as possible.</p> <p><u>Planned Actions:</u> Administration will continue to support proponents in navigating funding and project development processes as efficiently as possible.</p> <p>The Indigenous Housing Liaison position from recommendation 16 will also work to build capacity among Indigenous affordable housing applicants to ensure that complete and quality development applications are submitted, which can significantly</p>



	improve processing times.
<p>15. Create an affordable housing stream in the development permitting/licensing process. An example is the City of Calgary's Customer Coordinator for Affordable Housing that is a single point of contact for all non-market housing applications and planning in queries. The Customer Coordinator can help a proponent determine the City resources that may be available to them and arrange an expedited timeline to efficiently move the non-market housing application through the approvals process.</p>	<p><u>Current State:</u> There is currently a client liaison unit in the development services area that can work with any project proponent, including Indigenous affordable housing applicants, to ensure that the applications are processed as quickly as possible.</p> <p><u>Planned Actions:</u> Administration will continue to support proponents in navigating funding and project development processes as efficiently as possible.</p> <p>The Indigenous Housing Liaison position from recommendation 16 will also work to build capacity among Indigenous affordable housing applicants to ensure that complete and quality development applications are submitted, which can significantly improve processing times.</p> <p>Administration will explore alternative models used to prioritize affordable housing in the development process.</p>
<p>16. Maintain the Indigenous Housing Liaison position created in 2019 to establish and maintain relationships with Indigenous housing providers, assist in building capacity and support in navigating funding and project development processes.</p>	<p><u>Planned Actions:</u> Administration will submit a request to fund an Indigenous Housing Liaison position permanently as part of its submissions for the 2023 - 2026 operating budget process for City Council consideration.</p>
<p>17. Undertake a housing needs assessment and ensure Indigenous specific data is available to ensure access to reliable and accurate data that helps to identify specific housing needs</p> <p>a. As part of the city's current housing needs assessment</p>	<p><u>Current State:</u> Administration is in the process of completing a housing needs assessment, which will be updated periodically.</p> <p>a. Indigenous housing needs are specifically explored within the housing needs assessment. Future needs assessments will update and identify Indigenous</p>

<p>process, ensure it identifies specific Indigenous housing needs. Any future needs assessment should update and identify Indigenous housing needs.</p> <p>b. Any assessment should include both qualitative and quantitative data</p>	<p>housing needs.</p> <p>b. The housing needs assessment incorporates a combination of qualitative and quantitative data. Future needs assessments will incorporate both quantitative and qualitative data.</p>
<p>18. The collection and use of Indigenous data should align with ethical guidelines found in OCAP®, Tri-Council Policy Statement and RCAP.</p>	<p><u>Planned Actions:</u> Future needs assessments conducted by Administration will align with the collection, use, and disclosure requirements of the <i>Freedom of Information and Protection of Privacy Act</i>, as per legislative requirements, but Administration will also explore how to best ensure collection, use, and disclosure of Indigenous data aligns with the ethical guidelines put forth in OCAP®, Tri-Council Policy Statement and RCAP wherever possible.</p> <p>OCAP refers to Ownership, Control, Access and Possession. OCAP asserts that First Nations have control over data collection processes, and that they own and control how this information can be used.</p> <p>The Tri Council Policy Statement is a joint policy of Canada’s three federal research agencies: the Canadian Institutes of Health Research (CIHR), the Natural Sciences and Engineering Research Council of Canada, and the Social Sciences and Humanities Research Council of Canada (SSHRC). The Policy expresses the Agencies’ continuing commitment to the people of Canada to promote the ethical conduct of research involving humans.</p> <p>The Royal Commission on Aboriginal</p>

	<p>Peoples sets out ethical guidelines for research to ensure that appropriate respect is given to the cultures, languages, knowledge and values of Aboriginal peoples, and to the standards used by Aboriginal peoples to legitimate knowledge.</p>
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**Longer Term Implementation (2-5 years)**

<b>Recommendation as stated in the Project Summary Report</b>	<b>Response from Administration</b>
<p>19. Create a rebate program for permit fees and utility hookup costs. Such a program could rebate the cost of development and building permit fees as well as the cost of the utility hookups. The City of Edmonton had a successful rebate program in the past which had a positive impact on reducing the overall capital cost of a development, hence enhancing affordability.</p>	<p><u>Current State:</u> The City is working with EPCOR Utilities to ensure utility requirements are appropriate at the development stage. This work will be beneficial to housing providers.</p> <p><u>Planned Actions:</u> Administration will further explore the benefit of a rebate program for utility costs and other development fees that may help reduce the overall capital cost of an affordable housing development.</p>
<p>20. Enable the development of working relationships with various sector actors such as government, industry and other developers/housing providers</p>	<p><u>Planned Actions:</u> Administration will play a convening and facilitator role to enable various sector actors to develop further relationships.</p>
<p>21. Creating opportunities for networking among the sector. This would involve the development of opportunities for the various actors who currently do not interact with each other on an informal and networking basis. It is this type of relational partnerships that can result in collaboration between parties. One of the participants commented that builders who wanted to work with Indigenous communities did not know</p>	<p><u>Planned Actions:</u> Administration will play a convening and facilitator role and/or support others in doing this to enable various sector actors to interact and improve connectedness within the sector.</p>

<p>where to make initial contacts to build relationships.</p>	
<p>22. Create a dedicated funding stream for Indigenous affordable housing that has continuous intake and includes funding for three components: initial development (pre-development); capital; and, operational. The funding program would also:</p> <ul style="list-style-type: none"> <li>a. Ensure Indigenous involvement in the design of funding programs including development of guidelines and approval process. This should include ongoing dialogue with Indigenous housing providers as the guidelines and approval processes are being developed prior to any program being rolled out.</li> <li>b. Ensure the incorporation of adequate capital reserve funding for ongoing replacement and maintenance costs.</li> <li>c. Allow for culturally appropriate supports in Indigenous affordable housing projects.</li> <li>d. Build into funding programs recognition of the limited capital for Indigenous non-profit housing provider impacts. Historically, funding programs did not necessarily require the proponent to put up any equity. The Current City of Edmonton Affordable Housing Investment Plan requires a proponent to provide 10% of the total development cost as unencumbered equity. Participants indicated that the equity requirement was a condition that they could not meet.</li> </ul>	<p><u>Planned Actions:</u> Administration will submit a funding request as part of its submissions for the 2023 - 2026 operating budget process for Council consideration, to create a dedicated funding stream for Indigenous-led affordable housing projects.</p> <ul style="list-style-type: none"> <li>a. Administration will explore ways to incorporate Indigenous involvement in the design of funding programs for affordable housing.</li> <li>b. Administration will continue to support ongoing advocacy efforts with all levels of government for operating funding to support Indigenous-led housing providers in Edmonton.</li> <li>c. Administration acknowledges the importance of culturally appropriate supports in Indigenous housing and will explore ways to help ensure that services and programs connected to affordable housing projects meet the cultural needs of the intended residents of Indigenous housing providers.</li> <li>d. Administration will review the Affordable Housing Investment Program to investigate ways to address the challenges of the equity requirements for Indigenous housing providers.</li> <li>e. Administration will consider all types of housing during the development of its Affordable Housing Investment Plan. Where it is not possible to include particular housing types, Administration will advocate to other orders of government</li> </ul>

<ul style="list-style-type: none"> <li>e. Ensure resources are available to develop housing along the entire housing continuum and takes a variety of physical forms/housing types which align with the need of Indigenous communities.</li> <li>f. Ensure housing development includes a range of onsite services, programs or resources which reflect Indigenous cultures and values and meet the needs of Indigenous residents/tenants</li> <li>g. Ensure accountability and transparency is built into programs and processes.</li> </ul>	<p>regarding filling those gaps. For example, the provincial government is primarily responsible for the funding of emergency shelters and the City does not typically fund shelters.</p> <ul style="list-style-type: none"> <li>f. Administration will explore ways to help ensure that services and programs connected to affordable housing projects meet the cultural needs of the intended residents of Indigenous housing providers.</li> <li>g. Administration will build on existing policies and guidelines to ensure that accountability and transparency are integrated into the design and development of the programs and services.</li> </ul>
<p>23. Facilitate the development of a new, inclusive and adequately resourced Indigenous-led and community-based association/body/organization that can represent the interests of Indigenous-led housing in Edmonton and provide supports in the areas of funding, policy, research and advocacy with the aim of increasing collaboration and coordination.</p> <ul style="list-style-type: none"> <li>a. To play a role in capacity building among Indigenous housing providers</li> <li>b. Encourage collaboration among Indigenous housing providers</li> <li>c. include positions to support the work of such an organization</li> <li>d. Engage with other Indigenous organizations</li> <li>e. To create relevant communication and public awareness tools</li> </ul>	<p><u>Planned Actions:</u> Administration will develop an engagement approach with Indigenous communities and organizations, and other levels of government, to explore the interest and process for the development of a new community-based organization.</p>

<p>f. To facilitate solutions to Indigenous housing needs, which could include dealing with racism within the rental market, identifying information and supports for households moving from First Nations communities to the City, as well as looking at how to create Indigenous led non-market housing and individual homeownership options for Indigenous households.</p> <p>g. provide opportunities for mentorship in the creation Indigenous housing</p>	
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